



Lambeth Council
Planning Policy
PO Box 734, Winchester
SO23 5DG

29 March 2021

Dear Sir/Madam,

**Proposed Main Modifications to the Draft Revised Lambeth Local Plan (DRLLP) –
Representations on behalf of GSTT**

We write on behalf of our client, Guy's and St Thomas' NHS Foundation Trust ("the Trust"), in response to the Proposed Main Modifications to the Draft Revised Lambeth Local Plan in consideration to the actions arising from the examination Hearings held between October-November 2020.

We submitted written representations to the Regulation 19 publication of the Plan on behalf of the Trust in March 2020, for consideration as part of the Examination. After reviewing the Inspectors' publication of the Matters, Issues and Questions, we submitted further representations in relation to Matter 4.3 (affordable workspace) and Matter 8 (tall buildings), which formed the basis of our discussions at the hearing session held on 3 November 2020 with regards to Matter 4. Furthermore, we have been in discussions directly with the Council to agree a Statement of Common Ground ("SoCG").

The Trust is responsible for providing a variety of healthcare facilities within the London Borough of Lambeth including, of course, St Thomas' Hospital. It is a major employer and healthcare provider for the Lambeth community and seeks to ensure that the planning policy framework within which it operates supports the provision of healthcare and enhancement of its services as it continues to provide much needed acute and specialist healthcare services to the population.

Areas of support in relation to Matters 4 and 8

Following a review of the proposed main modifications and reflecting our ongoing engagement with the Council, we are very pleased to see the amended wording to Policy ED2 under Paragraph 6.14 (MM43), which now includes the provision that in regard to the requirement for affordable workspace provision, applications for the redevelopment and extension of existing offices will not include office floor space that is ancillary to, or integral to, the operation of a hospital or other healthcare facility. This is reflective of the discussions we have had during the Examination process and as per agreed within the SoCG.

The Trust also supports the modifications to the supporting text to Policy ED1 (MM34), which now specifies that offices that are ancillary to, or integral to, the operation of a hospital would not be subject to the marketing requirements of the policy when considering the loss of existing office floorspace. We understand this is largely in response to discussions that have been had between the Council and King's Hospital on the Denmark Hill Campus.

In addition, and in relation to our representations submitted on Matter 8, we note part b of Policy Q26 has been modified (M133) to recognise that identified site allocations are exempt from there being a no presumption in favour of tall building development, as also discussed and agreed with the Council through the SoCG. This reflects the need to consider public benefits when reviewing the case for tall buildings to ensure this is not lost through undue limitations in Borough-wide policy, which is strongly supported by the Trust. The Trust will continue engagement with the Council with regards to the allocation of St Thomas' Hospital, as part of the consultation process for the forthcoming Site Allocations DPD, which would allow the site to be considered under its own merits in relation to tall buildings.

Areas for further consideration

Within our representations dated 13 March 2020 and 9 October 2020, and as discussed at the Hearing session held on 3 November 2020, we proposed an amendment to Policy ED2 to provide the necessary flexibility to allow for the provision of alternative uses, such as social infrastructure, in place of affordable workspace. In addition, through discussions with the Council, we were unable to agree this through the SoCG and, therefore, had highlighted this as an area of disagreement.

We note that the Policy has not been modified in light of this. The Trust maintains the view that the provision of alternative uses, in exceptional circumstances, in place of affordable workspace, would be a beneficial addition to the policy as this recognises the public benefit that the provision of social infrastructure, or other facilities, has, while also appreciating the impact providing this infrastructure has on the viability of a scheme that comes forward. Introducing this flexibility is important in facilitating healthcare providers, such as the Trust, in being able to deliver vital healthcare infrastructure as part of new office development, particularly where it would be unviable for developers to provide both affordable workspace and social infrastructure. In addition, the Inspector had appeared supportive of this during the Hearing session and had seen the merit in amending the policy in this way. Therefore, we ask that this is reconsidered to ensure the policy can meet healthcare needs in the future.

Conclusion

We hope these representations are useful in the Inspector's consideration of the modifications and would like to reiterate the Trusts' support for the proposed modifications to Policies ED1, ED2 and Q26.

Yours faithfully



Emily Taylor
Principal Planner