

**MF3 – Examination of Draft Revised Lambeth Local Plan 2020-2035**

**Matter 4 – Economic Development, Retail and Town Centre Uses**

**4.1 Building a strong, competitive economy**

**Statement by Savills on behalf of Guy's and St Thomas' Charity (R053)**

## Introduction

- 1 This statement has been prepared by Savills on behalf of Guy's and St Thomas' Charity which owns a 5.4 acre site in the Waterloo area referred to as the Royal Street site. We have submitted representations to earlier drafts of the plan, most recently to the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 (reference R053).
- 2 Whilst the Charity supports the principle of the provision of affordable workspace, concerns remain over the lack of flexibility in the Council's approach to securing affordable workspace on major schemes. Representations made on behalf of the Charity and its development partner Stanhope have not resulted in changes to policy ED2 as currently worded in Draft Revised Local Plan.
- 3 As currently drafted, we remain of the view that policy ED2 fails to meet the test of soundness by proposing an unjustified and ineffective approach to the provision of affordable workspace on major schemes.
- 4 Our more detailed considerations are set out below and seek to answer the following Inspector's Matters, Issues and Questions:

### 4.1 Building a strong, competitive economy

- (ii) *Is the Plan flexible enough to encourage new and innovative forms of workspace in response to a fast-changing industrial context?*

## Part c

- 5 In response to question (ii), we consider that the rigidity of the forms of affordable workspace required does not allow sufficient flexibility for local need to be effectively met on all schemes across the borough, and that the policy should make provision for the Council to take a more flexible approach where there is demonstrated local need in site specific circumstance, in line with the draft London Plan.
- 6 The Government's introduction of the new use Class E means a range of other high street uses including retail, restaurant, leisure and community facilities now fall within the same use class as office (formerly B1a). Further, it is now possible to move between these uses without seeking planning permission, a measure intended to enable flexibility and the repurposing of town centres and high streets. We consider that the policy should allow for the provision of alternative forms of affordable workspace within the wider Class E to both support office uses and reflect the new flexibility in the planning use class order.
- 7 A more flexible approach would align with Policy E3 of the London Plan (Intend to Publish Version) which states that the intention of affordable workspace is to secure space below market rents for social, cultural or economic development purposes, such as rehearsal space. We consider that these purposes are not always captured within traditional office space. Further, we do not consider that the evidence base sufficiently considers these alternative uses or local need for these types of spaces, and that the policy is too narrow in this regard.

- 8 Part C of the policy sets out three ways in which affordable workspace can be made available. It is considered that the approaches are restrictive and flexibility should be included for a combination of the suggested approaches or alternative approaches to be agreed with the LPA, particularly as these will have to be defined at the time of planning permission being granted, but may not be delivered for some years and new products, arrangements, approaches may emerge as affordable workspace is relatively in its infancy. At the time of delivery, a better approach may be the best solution or the site and so a mechanism to allow for this should be considered.