



Carmel Edwards
Programme Officer
Lambeth Local Plan Examination

9 October 2020

Dear Carmel,

Draft Revised Lambeth Local Plan Examination – Matter 4

We write on behalf of our client, Guy's and St Thomas' NHS Foundation Trust ("the Trust"), in response to the Inspector's Matters, Issues and Questions published on 14 September 2020. The Trust submitted written representations to the Regulation 19 publication of the Plan regarding the provision of affordable workspace, which is covered under Matter 4 of the Inspector's MIQs. The points raised in this Matter Statement are therefore in relation to Issue 4.3 on affordable workspace.

The Trust are responsible for providing a variety of healthcare facilities within the London Borough of Lambeth including, of course, St Thomas' Hospital. They are a major employer and healthcare provider for the Lambeth community and seek to ensure that the planning policy framework within which they operate 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.

(i) Is policy ED2, which seeks to promote affordable workspaces, sufficiently responsive to sensitive viability considerations, or are there soundness issues with its application, for example in relation to applications for redevelopment and refurbishment of office space?

We recognise that it is important that new office schemes in Lambeth are not restricted in coming forward by Draft Policy ED2 and that it is fit-for-purpose. The Inspector's consideration of viability is welcome and increasingly necessary as we move towards a post-COVID world.

One way in which the draft policy could ensure it is adequately flexible and future-proof is to introduce alternative uses into the exceptional circumstances clause in Part (e) of the policy. Currently, Part (e) accepts a payment in lieu in exceptional circumstances. We recommend that consideration is given to other alternatives to the provision of affordable workspace that would also represent a comparable contribution to the community, such as the provision of social infrastructure. This inclusion would represent an opportunity to secure the provision of community facilities, which would support healthcare providers such as the Trust in being able to deliver new healthcare infrastructure as part of new office developments, where appropriate. Similar to affordable workspace, there are viability implications for developers of including such facilities in their schemes and therefore it follows that a development that is providing social infrastructure such as a new health facility, could not also provide affordable workspace. Therefore, an

amendment to the policy on this basis would make it more responsive to viability consideration and allow for the recognition of other benefits within developments.

(iii) Is there a case for amending the policy to make it clear that office floorspace associated with or ancillary to health facilities would form an exception to the policy requirements?

We are pleased to see that the MIQ document includes a question on the application of the affordable workspace policy associated with the provision of health facilities, which was raised in the Trust's Regulation 19 representations. The Trust, as a non-for-profit public benefit corporation, consider that they would qualify as a 'End User' in line with Draft Policy ED2 and the Affordable Workspace Supplementary Planning Document.

The Trust is and will continue to evaluate it's future development opportunities within the Borough to the benefit of both the local and wider community. There will be instances whereby the Trust is binging forward significant new office developments, on and off its Hospital campus locations, where the floorspace will be ancillary to the hospital and/or used only for workers associated with the public healthcare sector.

Given the Trust's very nature as an organisation and therefore status as an End User, it's own developments should not be subject to the requirements for the provision of affordable workspace under Policy ED2.

Any scheme coming forward would be, inherently, delivering a substantial public benefit given the nature of its operations in healthcare and medical research. The provision of affordable workspace would have practical limitations and viability implications which restrict it from being a justified or effective approach if applied. New office developments, for example within the Hospital campus where the major schemes are likely to be located, would be constructed purely for the use of healthcare related professionals and would be managed fluidly with other hospital or healthcare buildings. This is not conducive to the approaches to providing affordable workspace that are set out in Draft Policy ED2 given the management and practicalities of introducing other users.

The requirements set out in Draft Policy ED2 would present an unjustified burden on such development given that the applicant would be not-for-profit and likely to be on the list as an 'End User'. We question whether this is a wider policy conception issue that applies to all other End Users and that this is a matter for the Inspector to consider. On the basis of the above, we consider there is a case for an amendment to the policy wording to make it clear that there are exceptional circumstances where it should not apply, such as when associated with or ancillary to health facilities.

We hope these representations are useful in the Inspector's consideration of modifications to Draft Policy ED2. We will be attending the Matter 4 Hearing Session to discuss any potential changes to the policy.

Yours faithfully,

Emily Taylor
Principal Planner
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