



Carmel Edwards
Programme Officer
Lambeth Local Plan Examination

9 October 2020

Dear Carmel,

Draft Revised Lambeth Local Plan Examination – Matter 8

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 tall buildings, which is covered under Matter 8 of the Inspector's MIQs.

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.

(vii) Is it appropriate for the policy to specify that a public benefits case can be a material justification in relation to proposals to breach the height limits in the table in paragraph 10.147?

The Trust support the consideration of public benefits when reviewing the case for tall buildings.

Whilst there is clearly a need to assess proposals against key factors such as heritage assets and local character, and design should respond to these factors, the consideration of public benefits would ensure that clear community benefits are not lost from the argument when making decisions over height and design. It would also ensure that the height limits given do not unduly limit officers from bringing forward development that could deliver substantial public benefit as a result of specific limits in the Plan.

The Council has identified locations for tall buildings in the Local Plan however the Plan must remain flexible to account for proposals that may come forward outside of these locations. The consideration of public benefits would be a helpful tool in assessing the overall benefit of developments that come forward outside of these pre-identified locations.

The Trust may need to expand vertically on its sites to enhance its services and adequately manage its estate needs, therefore the consideration of public benefit, especially with regards to more sensitive locations, would be a fair and balanced way of assessing proposals. It would allow sites that are constrained in terms of land capacity to continue to expand and have the consideration of the benefits of their use considered in the planning balance.



We hope these representations are useful in the Inspector's consideration of modifications to Draft Policy Q26.

Yours faithfully,

Emily Taylor
Principal Planner

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