



DP4577

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Planning, Policy and Strategy
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Dear Sir or Madam,

**REPRESENTATIONS TO THE DRAFT REVISED LAMBETH LOCAL PLAN
PROPOSED SUBMISSION VERSION (REG. 19) (JANUARY 2020)**

SUBMITTED ON BEHALF OF HB REAVIS UK LIMITED

These representations to the Draft Revised Lambeth Local Plan are submitted on behalf of our client HB Reavis UK Limited (“HB Reavis”). HB Reavis is an international workspace provider operating in the United Kingdom, Germany, Slovakia, Poland, Czech Republic, and Hungary.

In 2017 HB Reavis acquired the Elizabeth House site at Waterloo. In October 2019, Lambeth’s Planning Applications Committee resolved to grant planning permission (subject to s106) for HB Reavis’ major commercial office scheme on the site, which will also deliver significant public realm improvements and works to alleviate capacity constraints at Waterloo Station. On the 9th March 2020, the Mayor issued his Stage 2 decision, allowing Lambeth to proceed to grant planning permission.

In accordance with the requirements of the NPPF (2019), HB Reavis continues to support Lambeth’s Local Plan review to ensure that changing circumstances affecting the borough are taken into account, along with any relevant changes in national policy.

On behalf of HB Reavis, DP9 submitted representations to the previous consultation version (Reg. 18) of the Draft Revised Local Plan (October 2018). We have reviewed the Council’s response to these representations within the Consultation Report. Accordingly, we wish to comment again on the draft policies below.

We are also submitting further representations to the Council’s Draft CIL Charging Schedule. Both sets of representations should be considered by the Council together.



Policy ED1 Offices (B1a)

HB Reavis continues to support draft Policy ED1 which supports proposals for large offices (greater than 1,000m² GEA) within the Central Activities Zone, the Vauxhall and Waterloo London Plan Opportunity Areas, plus major town centres. Aligned to this, HB Reavis also support the Plan's guiding spatial approach that seeks a focus for growth and development on Waterloo (supporting the London Plan Opportunity Areas) and support for tall buildings in appropriate locations to deliver regeneration and economic benefits.

We note that supporting large offices in these locations will support the achievement of the Strategic Objectives such as those set out within Section 3 of the Plan, including the provision of approximately 160,000m² GIA net additional office floorspace within the borough.

Policy ED2 Affordable Workspace

HB Reavis have worked positively with the Council to find a solution for Elizabeth House that addresses the draft policy requirement, whilst not compromising the overall scheme viability. This has been achieved through making available a package of discounted memberships to a managed workspace facility, equivalent to the value of the policy requirement.

Accordingly, we welcome the Council's response to this work, and our previous representations, through the insertion of additional supporting policy text at 6.20 which states that affordable workspace may be provided in the form of discounted memberships giving access to a range of spaces rather than discounted rents on a defined percentage of floorspace.

Policy ED7 Town Centres

HB Reavis notes from the Council's consultation report that it is no longer proposes to designate the Waterloo Metropolitan Town Centre. Rather, it proposes to expand the Waterloo CAZ retail cluster and to identify the Lower Marsh/ The Cut/ Leake Street Special Policy Area. The Council states this will protect the specialist character of these areas and that proposals for further retail development within the wider CAZ retail closure would need to demonstrate that they would complement and not undermine the special character.

We note that policy states that new retail development will still be acceptable elsewhere within the CAZ without the need for a sequential test, provided any impact on the identified CAZ retail clusters and Lower Marsh/The Cut/Leake Street Special Policy Area is carefully considered first. This approach was the basis on which the current Elizabeth House application was considered, therefore we consider the policy change is still compatible with the Elizabeth House proposals and the scale of retail proposed.



Policy T2 Walking

HB Reavis continues to support draft Policy T2 which aims to promote, and prioritise, walking through support for public realm enhancements and an improved environment for pedestrians. HB Reavis supports policy text at Part D which provides that pedestrian routes should normally be provided at street level, and that opportunities to replace existing subways and footbridges with safe routes at street level will be sought.

Policy T3 Cycling

HB Reavis supports draft Policy T3 which requires the provision of appropriate cycle storage facilities within new development, however we continue to believe that Policy T3 should also recognise that there are scenarios where providing cycle storage in accordance with the minimum standards contained within Policy T5 of the London Plan may be difficult to achieve, and that therefore a flexible approach being considered on a case by case basis is also warranted.

For example, due to the presence of four tube lines and other associated tube and railway infrastructure located beneath the Elizabeth House site, both the existing and proposed basement space is severely limited. Meeting the current draft London Plan standards is therefore likely to result in a reduction in the quality of the associated cycle storage facilities, such as showers, lockers etc. appropriate to the number of spaces provided.

In addition, there are sites where a flexible approach may also be warranted due to the public transport accessibility level, such as Elizabeth House which has an exceptional PTAL rating due to its location adjacent to Waterloo Station. Many train users ride folding bikes and therefore on such sites, we believe policy should recognise the popularity of folding cycle usage.

It is noted that supporting text to Draft London Plan Policy T5 recognises that an exception may be applied to the minimum standards, for office developments within the CAZ which are adjacent to rail termini. The supporting text states that this could be applied for up to 10 percent of long stay spaces, and where the full provision could not otherwise be provided.

Accordingly, HB Reavis maintains that draft Policy T3 should recognise the popularity of folding bikes and include an exception, in conformity with the London Plan, which has not been included.

Policy T4 Public Transport Infrastructure

HB Reavis continues to support draft Policy T4 which seeks better connectivity, quality and capacity in public transport, and the recognition that development should support and enable the identified projects, including improvements to capacity, access and



interchange at Waterloo rail and underground stations, and improvements to facilities and the provision of step free access at railway and underground stations.

The Plan recognises elsewhere that Waterloo station is the UK's busiest railway terminus and is a strategic transport hub and interchange, and that during peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo, and that investment is needed to improve conditions for passengers, to provide full access to stations and to enable the planning increases in resident and working population. The redevelopment of Elizabeth House is critical to achieving these strategic objectives.

Recognising these factors and the significant complexities of development adjacent to major public transport hubs and interchanges, HB Reavis supports draft policy text which states that proposals to improve or provide new public transport infrastructure and interchange facilities will be supported, subject to being acceptable in other ways.

It is noted that new policy text has been introduced referring to the requirement for development to support and enable improvements to the facilitation/ delivery of step-free access and interchange at Waterloo station. The Elizabeth House development is contributing to this objective, but the requirement presents another significant cumulative financial challenge for the scheme.

Therefore, we believe it is crucial the draft policy text at paragraph D which states that contributions from development towards public transport infrastructure should be proportionate to the projected number of additional trips arising from the development is retained. Additionally, we believe policy should recognise that the purpose of CIL is to fund this type of strategic infrastructure.

Policy T7 Parking

Draft Policy T7 seeks to promote a reduction in car ownership and private car trips. In relation to Elizabeth House, HB Reavis welcomes Part C of the policy text which states that the Council will apply the maximum non-residential parking standards contained within Policy T6.2 of the London Plan. The standards contained within Table 10.2 of the Draft London Plan provide that within the CAZ, development should be car free.

In response to our previous representations, HB Reavis also welcomes the removal of Part D of Policy T7 which previously stated that in Lambeth, non-residential disabled persons parking should be provided for 5 per cent of the workforce in all non-residential development proposals, including where no general parking is provided. We are now pleased to see that the Council will instead apply the maximum non-residential car parking standards set out in London Plan policy T6.5.

For Elizabeth House, the previous (now corrected) policy requirement – which we stated at the time was not in conformity with the London Plan – was used by the



Council as justification to require Elizabeth House to contribute towards step-free access to the London Underground at Waterloo. Now the draft policy has been corrected, the Council should consider carefully this interaction between policy T7 and policy T4 above.

As an additional way to address this interaction, we believe draft Policy T7 should include the potential for site specific solutions to be agreed in areas of high PTAL or for very large schemes adjacent to rail termini where disabled car parking is likely to be least required.

Policy T8 Servicing

HB Reavis continues to support draft Policy T8 and in particular policy text at Part G which states that the Council will apply London Plan Policy T7 in order to promote consolidation and distribution facilities that reduce servicing impacts including through the provision of shared delivery points with developments.

HB Reavis therefore, as requested, welcomes the introduction of new policy text which supports off-site consolidation for larger developments, or where access to the site is constrained, to be considered. In addressing our previous comments, we also welcome the new policy text which states that 24-hour servicing operations should be considered.

HB Reavis considers that policy text should require servicing strategies to be considered on a case by case basis, recognising that significant consolidation of deliveries can be achieved without a traditional consolidation centre, through both common procurement strategies and local procurement strategies.

Policy ED15 Employment and Training

The draft policy states that a minimum of 25% of all jobs created by the development (in both the construction phase and for the first two years of end-use occupation of the development) should be secured for local residents.

Whilst HB Reavis supports the principle and objective of policy ED15, we maintain our previously expressed concerns (repeated by others) that in relation to very large office developments such as that proposed at Elizabeth House, the Council's proposed target may not be realistic to achieve. This is because end-use office jobs are less likely to be newly created than retail or restaurant jobs.

In terms of construction jobs, whilst we believe the 25% target is also not realistic given the specific technical skills and experience required for most construction roles, HB Reavis is actively committed to an active and creative partnership with Lambeth to creating tangible employment and skills benefits for the Borough, as allowed for within ED 15.



It is noted that new draft policy text states that, if the developer makes all reasonable endeavours to meet the obligations required, and demonstrates to the satisfaction of the Council that there are circumstances specific to the scheme that mean either direct provision is not operationally feasible, or that an alternative means of delivery would result in a more effective outcome, then the council may consider a financial contribution in lieu.

However, the payment in lieu approach does not directly engage with the point made that in specific circumstances, such as provision of large office schemes where a very high proportion of end-use jobs created will be office roles, it is very likely that most of these employers will be relocating their existing office from elsewhere and bringing an existing workforce, rather than setting up a new business and creating 100% new jobs.

HB Reavis therefore maintains that in the case of very large office developments, draft Policy ED15 should recognise that a more tailored, flexible approach to meeting the Council's employment and training objectives may be necessary in order to be realistically achievable, rather than introducing a payment in lieu approach.

Additionally, we believe the Council should carefully consider and justify whether it believes the 25% policy requirement is realistic when considered cumulatively alongside draft policy ED2 which requires affordable workspace to be provided based on a percentage of floor area. In Waterloo, the percentage of floor area required to be provided as affordable workspace is 10%. We do not believe it is realistic to expect that 35% of jobs in a major office scheme such as Elizabeth House (circa 3,000 jobs) to be occupied exclusively by Lambeth residents.

Policy Q6 Urban Design: Public Realm

HB Reavis continues to support Policy Q6 which provides support for development which enhances the public realm, the setting of and spaces between buildings, and the removal of redundant or unsightly street furniture/ clutter.

Section 11: Waterloo and South Bank

Text at paragraph 11.12 recognises Waterloo's location within the Central Activities Zone and its identification as an Opportunity Area. As requested HB Reavis welcomes the inclusion of new policy text which makes reference to the indicative number of new jobs identified within the draft London Plan for the Waterloo OA, alongside the number of new homes, given that the area is identified as one of Lambeth's key economic growth areas.

Annexe 11: Waterloo Tall Buildings Map

As requested HB Reavis welcomes the deletion of maximum heights within the Waterloo tall buildings map. The map is now labelled as "Waterloo locations



appropriate for tall buildings” with heights stated as “general building heights”. HB Reavis welcomes the inclusion within policy Q26 of new policy text that provides a range of criteria where proposals for tall buildings will be supported, where they are in the locations identified as appropriate for tall buildings in Annex 11, such as when design excellence is achieved.

In summary, HB Reavis considers that overall, the Draft Revised Lambeth Local Plan Submission Version has been positively prepared and we believe the changes made in response to our earlier representations make the plan more effective and justified. We request that further consideration is given to our latest comments within this letter as we believe they would make the Plan even more effective.

We respectfully request that our representations are considered and we would be pleased to discuss the issues raised further with officers. Should you require any further information, please contact Joseph Daniels or Jonathan Smith of this office.

Yours sincerely

DP9 LTD