



Guy's and St Thomas'  
NHS Foundation Trust

Planning Policy Team  
London Borough of Lambeth  
PO Box 734  
Winchester  
SO23 5DG

200 Great Dover Street  
London  
SE1 4YB

T 0207 188 7188

[www.guysandstthomas.nhs.uk](http://www.guysandstthomas.nhs.uk)

13<sup>th</sup> March 2020

Dear Sir/Madam,

**DRAFT REVISED LAMBETH LOCAL PLAN  
PROPOSED SUBMISSION VERSION JANUARY 2020**

**REPRESENTATIONS ON BEHALF OF GUYS & ST. THOMAS NHS FOUNDATION TRUST  
ST. THOMAS HOSPITAL, WESTMINSTER BRIDGE ROAD, LONDON SE1 7EH**

Please find below representations on behalf of Guy's & St. Thomas NHS Foundation Trust (the Trust) in relation to the Proposed Submission Version January 2020 of the Draft Revised Lambeth Local Plan.

Overall, the Trust is pleased with the high-level support for the principle of the hospital expansion that is expressed in the Draft Plan and for the response to the previous representations submitted in 2018. There are a number of potential areas of concern identified below and we would be grateful if these could be reconsidered in the final draft to assist the future hospital expansion proposals and particularly to support the planned expansion of the Evelina London, the merger with the Royal Brompton & Harefield NHS Foundation Trust and the overarching Westminster Bridge Campus MedTech Cluster aspirations.

Representations

**Policy S1 Safeguarding existing social infrastructure**

The Hospital campus has a number of D1 (Health Centre / Education), and C2 (Hospital) use classes on site, which the Trust classifies as hospital buildings without full understanding of the nuances. It would be beneficial in terms of operational flexibility if such use classes could change between one another without requiring a change of use application, or being considered as a loss of social infrastructure, or the whole hospital site be classified as C2 (Hospital) like other Central London hospitals. Similarly, any loss of B1(a) space for healthcare related purposes should not be resisted under this policy.

**Policy S2 New or improved social infrastructure**

The Trust would be keen to be formally consulted on proposals in the Borough that could trigger additional service requirements at St Thomas' Hospital, or in our Community Health premises, such as residential schemes over 25 dwellings and commercial uses classes over 1,000sqm. This would allow the impact on the Trust's services to be quantified and relevant CIL funds to be allocated to the Trust to help address such issues.

**Policy Q19 Westminster Heritage Site**

Due to the location of the hospital, enhancing facilities to respond to healthcare requirements of the public will need careful management to avoid unacceptable harm to the World Heritage Site. The redevelopment of the campus would have significant public benefits that would be lost if the hospital could not justify required expansion. Accordingly, it is requested that reference can be made to the demonstration of Public Benefits of approving a proposal as a material consideration when assessing Trust applications against this policy.

**Policy Q26 Tall Buildings**

In order for the hospital to respond to existing and emerging healthcare requirements it will be necessary for taller buildings than currently exist to be proposed. Hospital and med-tech research buildings typically have relatively high floor-to-floor heights compared to other uses, which makes them taller in comparison. The Trust will seek to incorporate basement space wherever feasible, but it is likely that elements of major proposals will exceed the suggested height of 45m being what is defined as a tall building.

In order to support the Trust's plans it would be beneficial the following could be considered:

1. Raise this height from 45m to 60m on this campus for what constitutes a tall building, or
2. Directly designate any or all of the existing Gassiot House, St. Thomas' House, vacant space outside of A+E and vacant space outside Lambeth Wing, or

3. Reference that a Public Benefits Case can be a material justification for exceeding the 45m in a non-designated tall building area



### **Affordable Workspace**

We note that the Council are also consulting on the Affordable Workspace SPD and we will be submitting representations to this document. We request that this letter is read alongside any representations to the SPD once submitted.

With regards to the Council's proposed approach to Affordable Workspace, set out in Draft Policy ED2, the Trust will be seeking to be recognised as a not-for-profit organisation on the Council's 'register of organisations that require non-managed affordable workspace', and welcome this opportunity to be recognised as such. A concern regarding the effectiveness of the Council's approach is how the policy will consider new developments promoted by organisations that should be eligible for affordable workspace themselves, as this is not made clear in policy. This is a potential gap in the Council's policy drafting and we seek for this to be clarified in any future drafts of Draft Policy ED2. Notwithstanding this, the requirement to provide affordable workspace would not be justified if applied to the Trust's own developments, regardless, given their status as a public sector organisation that, through any new development or expansion plan, would be delivering a substantial public benefit given the nature of their operations. The requirements set out in policy would present an unjustified burden on such development.

We request that the policy is amended to make it clear that office floorspace associated or ancillary to health facilities would form an exception to the policy requirements. We would also suggest a clarification in the policy to account for applications from organisations included on the Council's register.

### **Policy PN1 Waterloo and South Bank.**

Thank you for directly referencing support for the healthcare, MedTech and life sciences aspirations of the Trust. The reference to agreement of a high level masterplan for the development is acceptable as an informal process, but the Trust would not want to delay necessary enhancements to the campus until such time as a formal masterplan is developed and agreed.

A key ethos of the Trust's intentions is flexibility over the Local Plan period to respond to healthcare and life science innovation needs in a more agile way than has been possible previously. A formal masterplan process could delay and constrain this, whereas an informal process could help enable proposals in a timely manner.

The Trust would be interested in considering a site specific allocation, similar to Site 1 – Land north and south of and including 10 Royal Street, SE1 (Founders Place), for the main hospital campus to support the principle of development and provide flexibility outside of a formal masterplan for proposal to come forward in the subsequent Site Allocations Development Plan Document.

### **Policies Map 2020**

#### **Local Designated Views.**

It is noted that all local views have been deleted in order to form a subsequent Local Views SPD. The Trust would appreciate if the emerging views in the Local Views SPD do not add additional view assessment requirements to the campus to the detriment of hospital expansion and enhancement plans.

#### **Map 12 – Proposed new Westminster World Heritage Site zones.**

The Trust is concerned that Map 12 could restrict potential to redevelopment Gassiott House in the future. The Trust requests that the zone proposed as 'Immediate Setting of Westminster World Heritage Site is reduced to the area of the hospital campus directly adjacent to the River Thames, and not encroaching onto the St Thomas Hospital Garden and beyond. In order to provide the quantum of area necessary to support the required public benefits of the development it may be necessary to adjust the Hospital Garden and provide healthcare space beneath, particularly if the tall building restrictions noted above cannot be relaxed as suggested. The Trust is concerned that Map 12 as currently drawn could in future restrict ability to respond to healthcare requirements, and requests that it be redrawn to highlight the area immediately adjacent to the River only. Typical planning controls would restrict inappropriate development being approved in this area in any event.

#### **Infrastructure Delivery Plan 2020**

Thank you for recognising the Trust's campus aspirations as an important regional and sub-regional development, and promoting District Heating Network developments, for which the Trust also has ambitious plans. Despite being essential community infrastructure, the Trust does not receive Community Infrastructure Levy from applicable developments in the Borough to support healthcare service provision, despite businesses, residents and visitors benefiting from the service provided.

Accordingly, the Trust requests that St Thomas' Hospital and out community based properties be considered for Community Infrastructure Levy (CIL) Regulation 123 List under the Health Care Facilities designation, and that Trust schemes be considered for inclusion within the Borough-wide infrastructure schedule and for CIL funding. This would greatly assist the viable delivery of the Trust's aspirations, in addition to the assistance already provided by healthcare proposals being exempt from CIL.

Further support to the Trust could be provided by making all non D1 (Health Centre) / C2 (Hospital) use classes on the Hospital campus, for example A1 (Shops) / A3 (Food) ancillary use classes, expressly exempt from CIL.

### **Summary**

The Trust is generally supportive of the Draft Reviewed Lambeth Local Plan and would seek to work collaboratively with the Council on any of the points raised in these representations. We request that the above changes and principles are taken into account before any future adoption of the Draft Plan as part of the Examination process. We would like to reserve the right to appear at Examination on any of the points raised in this letter on behalf of the Trust.

Yours sincerely



**Alastair Gourlay**  
**Director of Essentia**  
**Guy's and St Thomas' NHS Foundation Trust**

