

Tell us who you are

Ref: R080

Title

Miss

First name

Hannah

Surname

Willcock

Email address

hannah.willcock@dp9.co.uk

Agent's details

Are you an agent?

Yes

No

Title

Miss

First name

Hannah

Last name

Willcock

Job title (optional)

Organisation

DP9 LTD

Address

100 Pall Mall, London

Postcode

SW1Y 5NQ

Contact number

07841783300

Email address (optional)

Representors details

Title

Mr

First name

Stephen

Last name

Black

Organisation

, MEC London Property 3

Your representation

Please complete this set of questions for each representation you wish to make.

To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

PN1

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not effective

Please refer to supporting Cover Letter

Complies with the Duty to co-operate

- Yes
- No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

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- No - I do not wish to participate at the oral examination
- Yes - I do wish to participate at the oral examination

Your representation(s) will still be considered by the independent Planning Inspector by way of written representations.

Your representation 2

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

To which part of the Draft Revised Lambeth Local Plan Proposed Submission Version January 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

ed1

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

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(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

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Your representation 3

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- Yes
- No

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- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

ED2

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

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(optional)

Sound

- Yes
- No

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Please state why it is not justified

Please refer to cover letter

Complies with the Duty to co-operate

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- No

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Your representation 4

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- Yes
- No

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- Policy number
- Policies Map - map and/or table number

Please state policy number

ed13

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

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(optional)

Sound

- Yes
- No

If you wish to support the soundness of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Complies with the Duty to co-operate

- Yes
- No

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(optional)

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Your representation 5

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- Yes
- No

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- Policies Map - map and/or table number

Please state policy number

Site Allocation 9

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

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(optional)

Sound

- Yes
- No

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Please state why it is not effective

Please refer to cover letter

Complies with the Duty to co-operate

- Yes
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Your representation 6

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

- Yes
- No

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- Policy number
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Please state policy number

ED15

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

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(optional)

Sound

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- No

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Please state why it is not justified

Refer to cover letter

Complies with the Duty to co-operate

- Yes
- No

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Your representation 7

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

Yes

No

Require further notification

Please tick relevant boxes if you require notification of any of the following to the address stated previously in personal/agent details

(optional)

- That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination
- The publication of the inspector's recommendations following the independent examination
- The adoption of the Revised Lambeth Local Plan and Policies Map.

Review your answers

Review your answers

Before submitting your form you can review all of the answers you have given so far by clicking on the link below.

[Open a read only view of the answers you have given \(this will open in a new window\)](#)

Declaration

By submitting this claim you are agreeing to the following declaration. To view this declaration please click on the link below

I declare that the information I have provided on this form is accurate

Now submit your form using the submit button below.

DP5389/HWM/HRW

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London Borough of Lambeth
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Brixton
London
SW2 1RW

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London SW1Y 5NQ

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www.dp9.co.uk

13 March 2020

Dear Sir / Madam,

REPRESENTATIONS TO THE DRAFT REVISED LAMBETH LOCAL PLAN SUBMISSION VERSION JANUARY 2020

We write on behalf of our client, MEC London Property 3 (General Partner) Limited (MEC), to submit representations to the Draft Revised Lambeth Local Plan 2020 and its supporting evidence base.

In November 2019, MEC purchased the site known as the 'London Television Centre' (LTVC), 60-72 Upper Ground from ITV PLC who owned and occupied the building before deeming it surplus to requirement and relocating their operations elsewhere in London. MEC is being advised by Mitsubishi Estate London Limited (MEL) a subsidiary of Mitsubishi Estate, one of Japan's largest listed property companies, and CO—RE, a central London development specialist. MEL have extensive experience of development in London over the past 30 years having delivered Paternoster Square, Bow Bells House, 8 Finsbury Circus and are currently under construction at 8 Bishopsgate. CO—RE specialise in large scale, complex office and mixed-use developments having recently delivered One Fen Court and LSQ London, Leicester Square and are currently on-site at 20 Ropemaker Street. MEL and CO—RE are currently in discussions with LB Lambeth regarding the redevelopment of this site for commercial development.

It is within this context that we welcome the opportunity to make representations on the Draft Revised Lambeth Local Plan and we look forward to continued engagement throughout the Local Plan process.

This letter outlines a number of key comments and observations which we would like to record on the draft of the Lambeth Local Plan.

MEC is supportive of the overarching ambitions set out in policy D1, specifically encouraging and supporting sustainable development that enhances the local distinctiveness of neighbourhoods, specifically:

- The growth and development within the borough through the regeneration of the Waterloo



and South Bank area;

- The centre-specific approach to managing the mix of uses in town centres; and
- Supporting various initiatives such as neighbourhood plans, town centre partnerships, Business Improvement Districts, similar business networks and business-led and other neighbourhood management schemes in order to promote centres, assist in attracting inward investment, and co-ordinate and manage improvements to the public realm.

MEC welcome Lambeth's approach to sustainable development set out in part A of draft policy D2 which states that *"when considering planning proposals, the council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in Lambeth."*

Policy PN1 Waterloo and South Bank

MEC is supportive of the overarching objectives to enhance and support Waterloo and South Bank's role as key player in the central London and Lambeth economy, including its role as a pre-eminent international, domestic and local tourist, leisure, retail and entertainment area, as well as a major location for offices, creative and digital industries, healthcare, MedTech and life sciences businesses and higher education.

In principle, MEC welcome the aspiration to support the growth of the area's role as a business district by encouraging office development that provides a range of unit sizes, can be subdivided to encourage flexible use and co-working and workspace suitable for small and medium enterprises and creative and digital industries.

The principles set out in part F of policy PN1 are supported, which aims to promote the *"expansion of creative, arts and cultural activities throughout Waterloo and enhancing the South Bank in its role as an international cultural and leisure centre and a London tourist destination through supporting the development of arts and cultural facilities, associated and supporting uses."*

One of MEC's key priorities for the redevelopment of the 'LTVc' site is to provide high quality, permeable, safe and accessible public realm that is durable, well designed and maintained to reinforce Waterloo's status as a world class place and are therefore supportive of the principles set out in PN1 part g.

Draft Site Allocation 9

In relation to the draft site allocation 9, we ask that the allocation is updated to reflect the new ownership that excludes the adjacent Princes Wharf and removes reference to the Garden Bridge.

We note that the preferred uses in the allocation refer to a mix of uses including residential. Whilst we understand this provides flexibility for potential uses on the site, we query whether this needs to be updated to reflect the changes to regional policy. Whilst the current London Plan policy 2.11 (A) states that proposals to increase office floorspace in the CAZ should include housing, the Mayor's CAZ SPG and Policy SD5 of the draft London Plan identifies that offices and other CAZ strategic functions should be given greater weight relative to new residential use in the Waterloo Opportunity Area. We believe the site allocation should be updated to reflect this and outline that the preferred mix of uses are not a mandatory requirement. A development with no residential would still make effective use of the



LTVC site and would meet the strategic aims for this site. A predominantly office development with ground floor active frontage is considered to be appropriate for this highly accessible site within the CAZ.

Policy ED1 Offices (B1a)

Draft Policy ED1 (Offices B1a) supports large offices (greater than 1,000 sqm GEA) in the CAZ and in Waterloo Opportunity Area, with smaller offices (up to 1,000 sqm GEA) supported in all locations. The redevelopment of offices for a mix of uses will also be supported where the quantity of the original B1 floorspace is replaced or increased as part of the development or elsewhere in the vicinity in Lambeth and incorporate existing businesses where possible. The requirement to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises is acknowledged. However, MEC do not wish this to be prescriptive in the event a major occupier wishes to acquire the majority of the office space for their own benefit.

Policy ED2 (Affordable Workspace)

MEC is supportive of the principle of affordable workspace. Affordable workspace often provides good conditions for start-ups and small businesses. Some employment sites may not be appropriate for small businesses and are more suitable for buildings with larger floorplates for larger businesses.

Within policy ED2, In Waterloo/Southbank developments proposing at least 1000sqm (GIA) gross B1a office floorspace should provide 10 per cent of that floorspace at 50 per cent of market rents for a period of 15 years. Affordable workspace requirements should be assessed on an individual site basis and therefore a blanket requirement for all sites to provide affordable workspace is not considered appropriate. Paragraph 6.14 of the supporting text states that “ *the policy will apply to all applications involving 1,000sqm or more gross B1a office floorspace (GIA) in the areas of Lambeth identified in part (a) the policy. This includes applications for the redevelopment and extension of existing offices. The policy will also apply to planning applications that involve refurbishment of existing office space where this would result in an increase in the quality and rental value of the space.*” The 10% requirement for low cost / affordable workspace is too prescriptive and should only be sought on the net additional uplift of employment floorspace.

Part f) of the policy states that “ *proposals that do not provide the level of affordable workspace required by this policy will be required to submit viability information, which will be independently assessed. Where this assessment determines that a greater level of affordable workspace could viably be supported, a higher level of affordable workspace will be required. In addition, early and late viability reviews will be applied to all schemes that do not provide the level of affordable workspace required by the policy.*” Whilst we agree with the principle that any affordable workspace proposed under the policy requirement should be subject to viability, it does have the potential to present a significant bar to the development of new and enhanced office floorspace in the area. The subject to viability caveat implies the submission of evidence to the Council to demonstrate the ability to provide affordable workspace at the reduced levels sought. This has the potential to add time and cost to the planning process and the timeframes for the review of information should be agreed between the parties at an early stage.

Policy ED13 (Visitor attractions, leisure, arts and cultural uses)



MEC welcomes the principles set out in policy ED13 which promotes, safeguards and improve leisure, recreation, arts and cultural facilities in the borough where they meet local and wider needs, especially in the Central Activities Zone and Waterloo.

Policy EN4 (Sustainable Design and Construction)

One of MEC aspirations for the proposed development of the LTVC site is to provide a high-quality sustainable development and therefore welcome Lambeth's aspirations to ensure that all development, including construction of the public realm, highways and other physical infrastructure, will be required to meet high standards of sustainable design and construction feasible, relating to the scale, nature and form of the proposal.

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 MEC supports the principle and objective of policy ED15, we are concerned that in relation to very large office developments such as that proposed at ITV, the Council's proposed target may not be realistic to achieve. This is because office jobs are less likely to be newly created than retail or restaurant jobs.

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-user jobs created will be office occupiers, 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.

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.

We trust that our representations will be fully considered and taken into account as the preparation of the Lambeth Local Plan continues. If you require any clarification on any matters, or wish to discuss our representations further, please do not hesitate to contact Hannah Willcock or Hugh Morgan of this office.

Yours Faithfully,



DP9 Ltd

DP9 Ltd.