



Jacqueline Christie
Programme Officer - EiP New Southwark Plan
160 Tooley Street
London
SE1 2QH

1 February 2021

Dear Jacqueline,

MATTER STATEMENT - MATTER 5

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 10 December 2020. The Trust submitted written representations to the modifications to the New Southwark Plan in October 2020 of the Plan regarding the draft policies on affordable workspace and office accommodation. Draft Policy P29 and Draft Policy P30 on office accommodation and affordable workspace is discussed under Matter 5 and the points raised in this Matter Statement relate to Issue 1.

MIQ 5.21 Is the requirement for a two year marketing period justified? Is it supported by evidence?

This question from the Inspector is in regard to Draft Policy P29 that covers office and business development within Southwark. Part 2 of the Draft Policy refers to the loss of employment floorspace, including office accommodation, only being allowed in exceptional circumstances, implementing a two year marketing requirement for applications that would result in a reduction in floorspace. The Trust considers that at present, the policy is not sufficiently flexible to address instances that may occur within the Plan period whereby office floorspace may be reduced or lost as part of healthcare transformation or the redevelopment of healthcare assets. In response to the Inspector's question, this is a situation whereby the two year marketing period would not be justified.

Where the loss of offices is proposed in relation to a healthcare project or healthcare provision, the requirement to provide such marketing evidence would be a significant constraint and may restrict public healthcare bodies in their ability to realise their estate plans. As a recognition of this, in the recent Lambeth Local Plan Examination in Public, this matter was discussed via the Examination and an amendment to the Borough's policy has been proposed and agreed with the Inspector to make it clear that offices that are ancillary to or integral to the operation of a hospital would not be subject to marketing requirements.

We therefore request that an amendment is made to the policy to make it clear that within the bracket of exceptional circumstances, the loss of office accommodation, where it is linked with a hospital or healthcare provider, would not trigger this marketing requirement.

MIQ 5.22 Is the policy overall justified, effective and consistent with national policy and the London Plan? Is it viable? Is it sufficiently flexible?

The requirement for the provision of affordable workspace should be proportionate to the type and nature of the development coming forward. In this regard, offices coming forward that are associated with or ancillary to hospital or healthcare facilities, should not be subject to the requirement for affordable workspace. The Trust is and will continue to evaluate its future development opportunities within the Borough to the benefit of both the local and wider community. There will be instances whereby the Trust is bringing forward significant new office developments, on and off its Hospital campus locations, where the floorspace will be ancillary to/associated with the hospital and/or used only for workers associated with the public healthcare sector.

Given the Trust's very nature as an organisation, as a not-for-profit public benefit corporation, any scheme coming forward would be, inherently, delivering a substantial public benefit given the nature of its exemplar work 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 primarily for the use of healthcare related professionals and would be managed fluidly with other hospital or healthcare buildings. The Trust may also give space to complementary operations, such as healthcare start-ups, organisations and businesses working in the sector. These are all interlinked and supporting to the purpose of providing world class healthcare in the Borough. The nature of these developments is not conducive to the requirements of Draft Policy P30 nor in the spirit of the type of developments that it is targeted at. The requirement for affordable workspace would present an unjustified burden on such developments.

Also in the recent Lambeth Local Plan Examination, we agreed an amendment to the Lambeth Local Plan to make it clear that their policy on affordable workspace would not apply to offices that are ancillary to or integral to the operation of a hospital. This was debated at Examination and has been agreed in a Statement of Common Ground. We request a similar exclusionary approach to be made clear in the policy wording and supporting text of Draft Policy P30 of the New Southwark Plan.

MIQ 5.26 How will eligibility for affordable workspace be considered and secured?

In previous representations, the Trust has made it clear that there may be circumstances where it, or other public healthcare body, could benefit from office space and should be considered an affordable workspace occupier. The Trust obviously largely operate out of their main campus sites, including Guy's Hospital, however it comprises a much wider organisation that includes a range of community and specialist healthcare teams. These teams often need to be located in other parts of the Borough in much smaller communities, and the take up of affordable workspace could be a significant opportunity for these working groups.

The Trust also work with a wide variety of partners, including health start-ups, organisations and businesses that are working within the healthcare sector to push forward the latest treatment methods, research projects and advances in clinical care. Having such organisations in close proximity to the Trust's sites, whereby clinical medicine is administered, is a key benefit and can more closely relate the latest research to the actual treatment of patients. Therefore, the Trust has a key priority in ensuring that such operations can continue and are able to locate within the

Borough. From this perspective, the importance of ensuring that these organisations and businesses can be considered for affordable workspace opportunities, especially those emerging around Guy's Hospital campus, is of the utmost importance.

Part 2(5) of Draft Policy P30 requires that a decision be made on the occupier of affordable workspace in liaison with 'the Council, local businesses, business associations and workspace providers'. The Trust request that this part of the policy is amended to includes consultation with 'relevant public sector stakeholders'. The inclusion of the Trust, when relevant, in these conversations could support either their own staff or the many organisations and businesses that the Trust work with, linked to the healthcare sector, to find appropriate space within the Borough. This would support the continuation of pioneering research and ultimately, the provision of healthcare to the population of Southwark. Furthermore, Part 2(3) of the policy makes reference to local demand, and the Trust are well placed to advise on such demand from a healthcare perspective. Therefore, the Trust considers this an important clarification to the policy to ensure that affordable workspace is considered and secured befittingly by Draft Policy P30.

MIQ 5.29 What would be considered exceptional circumstances to justify the provision of affordable retail or affordable cultural uses and is the policy sufficiently clear as to what these are?

The Trust considers that Draft Policy P30 could go further in its exploration of exceptional circumstances to the policy. We have covered above the matter of not requesting an allocation of affordable workspace if the offices are associated with a hospital or healthcare provider, in response to the need for flexibility. The Trust also recommends 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. The policy includes the requirement to have a named occupier and this would be a fair requirement to apply to the provision of a community facility in lieu of affordable workspace also.

We hope these representations are useful in the Inspector's consideration of modifications to Draft Policy P29 and P30 and we will be attending the Hearing Session on Tuesday 2 March 2021 where these will be discussed.

Yours faithfully,



Emily Taylor
Principal Planner



XX/xx