

6th April 2010

FREEPOST RRZZ TLHU GKZS
Planning Service
London Borough of Lewisham
5th Floor, Laurence House
1 Catford Road
London SE6 4RU

[By Email \(planning.policy@lewisham.gov.uk\)](mailto:planning.policy@lewisham.gov.uk)

Dear Sir,

LONDON BOROUGH OF LEWISHAM: CORE STRATEGY PROPOSED SUBMISSION

ON BEHALF OF WORKSPACE GROUP PLC

We act on behalf of Workspace Group, who owns Faircharm Studios, Deptford, SE8 3DX.

Workspace Group is a specialised property based business that provides office, studio and light industrial workspace for predominantly small and medium sized enterprises. Workspace provides good value, small unit employment accommodation for rent in London and the South East. Workspace manages 5.7 million sq ft of accommodation across 100 estates and has more than 4,000 tenants with much of this space being located within London. As such, Workspace provides a significant contribution to London's economy and has first hand experience of the changes in property market conditions.

Workspace has increased the range of units on offer and tenant diversity, whilst providing economies of scale in terms of management and marketing. The result is a substantial and diverse portfolio, able to meet the needs of London's dynamic small business community.

Workspace seeks to continue to provide good value small business units, in line with the key objectives of the London Plan. In order to do this, some of their premises will require regeneration and renewal to meet the modern and future needs of London's businesses. Such regeneration requires funding and Workspace proposes that if this is to be privately funded, a high-value economic driver will be necessary to enable redevelopment and ensure the overall viability of regeneration. The benefits of this are:

- The creation of modern business units, which can continue to be provided as good value rental accommodation;
- The more efficient use of urban land;
- The retention of the same, if not higher levels, of employment on existing sites;
- The provision of sustainable mixed-use development;

- The development of land to assist in meeting the targets and needs of the sub-region;
- Avoidance of reliance on public funding;
- The continued support of small and medium enterprises through the provision of modern, good value rental accommodation;
- The provision of affordable housing if a residential component is included in the scheme, infrastructure services, new business units, supported by higher value units.

Many commercial and industrial areas and properties will inevitably require upgrading to keep pace with the evolving needs of London's economy and without the incorporation of a higher value mixed-use, the land may become sterilised and potential regeneration benefits lost.

Spatial Policy 1: Lewisham Spatial Strategy

Workspace supports the identification of Deptford as a regeneration and growth area. However Workspace considers that the Spatial Strategy is unsound as it is not based on up to date housing supply evidence i.e. a Strategic Housing Land Availability Assessment and it is clear that the Council cannot meet an up to date five year housing supply.

It is noted that the Council's SHLAA is two years out of date and that the methodology used does not meet the Department for Communities and Local Government practice guidance titled 'Demonstrating a Five Year Supply of Deliverable Sites' (2007). Consequently more housing sites should be identified. Workspace considers that Faircharm Studios should be considered as a mixed-use development site that can assist in meeting the Council's housing requirements.

This guidance states the purpose of this document is to set out advice to Government Offices and the Planning Inspectorate in considering whether Local Planning Authorities are able to demonstrate a 5-year supply of specific sites which are deliverable in the terms of paragraph 54 of PPS3. This guidance states that there are three main stages to the SHLAA. These are:

- Identify the level of housing provision to be delivered over the following 5 years. Local Planning Authorities should use, where available, housing provision figures in adopted Development Plans, adjusted to reflect the level of housing that has already been delivered.
- Identify sites that have the potential to deliver housing during the following 5 years. Potential sites include those that are allocated for housing in the Development Plan, sites that have planning permission (outline or a full planning permission that has not been implemented) and specific, unallocated brownfield sites that have the potential to make a significant contribution to housing delivery during the 5 year period. Such unallocated brownfield sites would normally have been identified by the Local Planning Authority as being suitable for a housing use and have made sufficient progress through the planning process at the time of the assessment to be able to be considered deliverable in the terms of paragraph 54 of PPS3.
- Assess the deliverability of the identified potential sites. Paragraph 54 of PPS3 says that to be deliverable, sites should:

- Be available - the site is available now
- Be suitable - the site offers a suitable location for development now and would contribute to the creation of sustainable, mixed communities
- Be achievable - there is a reasonable prospect that housing will be delivered on the site within five years.

The Council has identified approximately 2,800 dwellings that do not have planning permission. In the planning appeal Asprey Homes Ltd at Former Blue Circle Sports Ground and adjoining land, Bromley Common, Bromley – (November 2007), the Planning Inspector concluded that the Council could not demonstrate that not all sites with planning permission will be delivered within the five year period and the Council could not demonstrate with certainty that the sites without planning permission would come forward. Lewisham Council's SHLAA does not provide any credible evidence to demonstrate that the sites in the SHLAA will come forward.

Furthermore it is considered that the Council's methodology has not taken account of the significant housing market changes since 2008 nor has it taken account of realistic build out rates as cited in 'Housing Markets and Planning Analysis Expert Panel - Factors Affecting Housing Build-out Rates: A report by Professor David Adams and Dr Chris Leishman'.

The Council should therefore consider more housing sites to meet its minimum London Plan housing requirement. Workspace considers that the Council should include Faircharm Studios as this site has the potential to contribute to the Council's housing and employment objectives.

Spatial Policy 2: Regeneration and Growth Areas

Workspace considers that Spatial Policy 2 is unsound as it has not been robustly assessed to take account of the areas full capacity potential. For the reasons cited in comments to Spatial Policy 1, Workspace considers that the Regeneration and Growth Areas have the capacity to deliver significantly more than the 14,975 new homes and 100,000 sq.m of new and reconfigured employment floorspace by 2026. Furthermore Workspace considers that significantly more homes can be delivered the Deptford, Deptford Creekside, New Cross/New Cross Gate area than the 2,300 additional new homes by 2016 and additional 8,325 new homes by 2026 as cited in the policy.

The Deptford, Deptford Creekside, New Cross/New Cross Gate area has good public transport accessibility, is strategically related and has an abundance of underused sites such as Faircharm Studios that could be redeveloped to increase employment and housing numbers. These sites have not been taken into consideration and as such this policy conflicts with PPS1 and PPS3 which seek the efficient use of land.

Workspace support the retention of creative industries in Lower Creekside, however it is not considered that the accommodation at this location meets the long-term requirements of the industry and there is a danger that if new accommodation is not introduced for this industry then this industry will relocate to another location outside the borough. As such this policy fails the Planning Inspectorate's Test (ix) of soundness which states that a policy needs to be reasonably flexible to enable it to deal with changing circumstances.

Core Strategy Policy 1: Housing Provision, Mix and Affordability

Workspace supports the principle of affordable housing provision in new developments for the purposes of securing local need and ensuring a mixed and sustainable community. However, such provision should be considered on a site-by-site basis, together with its viability and the regeneration benefits a scheme could provide.

Workspace considers that the affordable housing policy is unsound as it does not fully take account of the evidence within the affordable housing viability assessment. Workspace agrees that a maximum negotiation target be set however disagrees that the target should be 50%. The Council's affordable housing viability assessment states that in the current market conditions, it will be difficult to achieve the 50% requirement across all types of sites, throughout the three 'value areas' in the Borough. Consequently Workspace considers that this figure should be lowered to a more appropriate maximum figure such as 35%. This approach would accord with the emerging Replacement London Plan and PPS3 which states in paragraph 29 that affordable housing targets should take into account the risks to delivery. This policy fails the Planning Inspectorate's Test (ix) of soundness which states that a policy needs to be reasonably flexible to enable it to deal with changing circumstances.

Workspace considers it essential that affordable housing is delivered by a number of bodies and that the Council should not be reliant upon S106 agreements with developers. In order to meet the Council's own targets, a significant proportion of affordable housing will have to be come from sources such as RSLs, the Council and the HCA. This should be considered within the policy.

Workspace considers that any future proposed tenure mix should be indicative only and open to negotiation, whereby issues such as a scheme's viability and the economic and social benefits of regeneration are taken into consideration.

Workspace considers that Part 5 of this policy is unsound as it conflicts with PPS3 and could undermine housing delivery. It is unreasonable for the Council to expect 3-bedroom+ dwellings in all schemes for 10 dwellings or more. It is considered to be unsound as it does not reflect the current housing market and housing demand within the borough. Furthermore this policy contradicts the policy requirements of PPS3. Paragraph 23 of PPS3 states that developers should bring forward proposals for market housing which reflect demand and the profile of households requiring market housing, in order to sustain mixed communities. This policy fails the Planning Inspectorate's Test (ix) of soundness which states that a policy needs to be reasonably flexible to enable it to deal with changing circumstances.

This policy and its evidence fail to understand the distinction between market need and market demand. The building industry will base its assumptions upon whether a development is feasible and viable based on market demand. This demand is generated by a variety factors not least access to mortgage lending, which in itself can impact upon the specific type of dwellings in demand. Workspace consequently considers that the housing mix should be determined on a site-by-site basis. It is important that the market housing mix is determined by the private sector so that residential schemes can respond to the market demands and site specifics at any given time, taking into account market signals.

Furthermore, the size of dwellings relates more to age and wealth than it does to the sizes of households. Households typically build up wealth through the course of a lifetime. Using a

lifecycle model, households may start with smaller housing but progress up a housing ladder over the course of a lifetime looking for larger properties when they have children and when they are able to afford to do so. As they age and children move away from home, many households choose to remain in their existing housing rather than downsize. There is therefore typically no direct relationship between dwelling size and household size in the private sector. The social sector is more regulated in that housing is allocated in relation to the housing size required, but it is still possible for households to under occupy larger housing.

It is apparent that housing and planning policies have little influence over who occupies housing, particularly in the private sector. Workspace considers that a flexible approach is required to provide the mix of market and affordable housing. Workspace considers that the dwelling mix should be considered on a site-by-site basis that takes into the local context.

Core Strategy Policy 4: Mixed Use Employment Locations

Workspace supports the principles of the development of the Mixed Use Employment Locations. Workspace however objects to the exclusion of Faircharm Studios from this designation. This policy is therefore unsound as the Council has failed to take account of the capacity of employment sites to deliver more housing and increase employment potential.

It is considered that the comments in the Council's Employment Land Review relating to Faircharm Studios do not take account the actual needs of creative industries, existing and future market conditions, and the ability of the site to increase employment potential through a residential/employment mixed—use development. PPS4 states that development policy should not restrict economic development. Workspace considers that the redevelopment of this site has the potential to significantly increase GVA in the borough and meet the Council's Core Strategy Objective 4: Economic activity and local businesses.

Core Strategy Policy 8: Sustainable design and construction and energy efficiency

Workspace considers that Core Policy 8 is unsound on the basis that significant changes to national policy result in this policy not being necessary.

There have been significant changes to the legislative and policy framework through the Climate Change Act, The Low Carbon Transition Plan and Renewable Energy Strategy, which demonstrate Government's increased ambitions on reducing carbon emissions and delivering renewable energy. The Climate Change Act 2008 introduced a statutory target of reducing carbon emissions by 80 percent below 1990 levels by 2050, with an interim target of 34% by 2020. These ambitions are in the process of being reflected in the national planning framework and through building regulations. The progressively demanding standards for CO2 emissions set through Building Regulations, together with the assessment of local opportunities for renewable and low carbon energy, will help drive greater use of decentralised energy. It is consequently considered that the requirement for a borough-wide decentralised policy is unnecessary and merely repeats national policy. It is considered that the current London Plan (2004 consolidated with changes) and the emerging draft London Plan (2009) if adopted will provide sufficient policy cover in interim period to 2013 when revisions to Part L of the building regulations will come into force.

It is considered that the fast moving Government policy has overtaken the Lewisham Core Strategy and consequently this Core Strategy policy is no longer required.

Furthermore Workspace considers that the on-site renewable target is unsound as it is considered that this policy is contrary to national planning policy set out in PPS1 and its climate change supplement and may stifle the regeneration and growth objectives for Lewisham.

PPS1 states that local planning authorities should ensure that development plans address potential impacts upon climate change including through policies which seek to reduce energy use and energy emissions and promote the development of renewable energy resources. The advice in PPS1 has been clarified and developed further through the publication of 'Planning and Climate Change' a supplement to PPS1. Under the heading 'Testing Local Requirements' paragraph 33 of the climate change supplement advises that any policy relating to local requirements for energy supply should ensure what is proposed is evidence based and viable having regard to overall costs of bring sites to the market. In the case of housing development it is stated that the policy approach should demonstrate that the proposed approach is consistent with securing the expected supply and pace of development shown in the housing trajectory required by PPS3 and does not inhibit the provision of affordable housing.

Core Strategy Policy 11: River and waterways network

Workspace supports the principle of preserving and enhancing the character of the Borough's rivers. Workspace considers that the regeneration of the river frontages must be a priority, particularly Creekside, as it is essential to improve the viability and setting of such locations.

Core Strategy Policy 15: High quality design for Lewisham

Workspace supports the design principles set out in the policy.

Core Strategy Policy 18: The location and design of tall buildings

Workspace agrees with Part 2. It is considered that tall buildings should be considered across the borough particularly where they are essential for the delivery of regeneration schemes and where they will assist in enabling the delivery of modern economic floorspace within mixed-use developments. Workspace considers that tall buildings allow for the efficient use of land and provide excellent regeneration opportunities through the provision of mixed-use developments that include housing and employment floorspace.

Core Strategy Policy 20: Delivering educational achievements, healthcare provision and promoting healthy lifestyles

Workspace considers that this policy is unsound as the policy fails to take account of the linkages between education/training and employment.

Workspace considers that skills training and education provision and considers it important for the development of the local, regional and national economy. Such training is particularly important for the development and growth of small and medium sized enterprises which form the engine of economic growth at a local level and London-wide level.

Workspace has experienced an increasing demand for Class D floorspace in employment areas. Recent Government initiatives aimed at training and improving the skills of the workforce has increased demand for on-site training facilities within existing employment areas. These training initiatives often fall within Class D1 and are important for the development of the economy. It is important that these uses are not restricted and consequently should be encouraged at existing employment locations. It is therefore important that training facilities are provided close to major sources of employment to synergy between business and education. This approach is consistent with PPS4, which states that economic development includes that which provides employment opportunities, generates wealth and produces or generates an economic output or product.

Core Strategy Policy 21: Planning obligations

Workspace considers that a balanced approach should be taken when considering the value of the overall planning obligations package, thereby ensuring the viability and deliverability of the proposed development to meet strategic objectives. As such, Workspace considers that any S106 contributions should be applied on a site-by-site basis and adheres to the requirements of Circular 05/2005. Planning obligations must only be imposed when it can be demonstrated that they are needed to mitigate against the impact of the development.

Conclusion

I trust that the comments, made on behalf of Workspace, to the Core Strategy Proposed Submission document will be considered by the Council. However should you require clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,

Andrew Ransome MRTPI
Director

cc Ian Dubber – Workspace Group Plc

JD/JS/P4165
6 April 2010

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Dear Sir or Madam,

Lewisham Local Development Framework – Core Strategy Proposed Submission Version.

We write on behalf of our client (Workspace Group PLC) to make representations to the Lewisham Local Development Framework – Core Strategy: Proposed Submission Version (February 2010).

Workspace Group PLC is reviewing its property portfolio within Lewisham and actively pursuing the long term improvements of the Faircharm Estate within Creekside. Our client is keen to be involved in the formulation of LB Lewisham's Local Development Framework, particularly the Core Strategy, as a major investor in business space in Lewisham.

These comments follow on from those made to the Council's Core Strategy Option Report Consultation (February 2009) and a subsequent meeting with the Council in April 2009 to discuss the site and Workspace's aspirations for the site. It is disappointing that those comments and discussions have not manifested themselves within this Proposed Submission Version of the Core Strategy.

We have made individual comments using the Council's online consultation portal. However, given the scope of the comments our client wishes to make (and for the sake of clarity) we set out our principal representations below.

Regeneration of Business Space

Workspace's regeneration model is simple. Where the existing premises are no longer environmentally or physically viable, they will replace them with modern business space, offering flexible leases targeted specifically at small and medium enterprises (SMEs), which do not subject them to long term financial commitments. Given the relatively low open market rents for modern SME space across London, often the replacement/regeneration of the business space will only be viable/achievable via an integrated mixed-use development, which incorporates higher value uses such as residential and local retail, which can then act as an enabling development to subsidise the provision of the replacement business space. This model has been adopted to deliver the redevelopment of the Wandsworth Business Village within Wandsworth and will be pursued in the redevelopment/regeneration proposals for Creekside.

In summary, Workspace supports the adoption of a flexible policy approach towards the provision

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April 2010

of new and improved business/SME space within the Borough, reflecting their regeneration model. Specifically, Workspace are of the view that new policy must recognise that the renewal/regeneration/improvement of existing business space is only likely to be achievable/viable via an integrated mixed-use development, which incorporates higher value uses such as residential, retail etc which can act as an enabler for development.

With this in mind, our comments of the Core Strategy Proposed Submission Version are as follows:

Our client's site, Faircharm Estate is located within Creekside. Within the London Plan the Opportunity areas of Deptford Creek/Riverside and Lewisham- Catford- New Cross have been identified as a focus for new housing and jobs, with an indicative employment capacity of 4000 for Deptford Creek/Riverside and 3,500 for Lewisham- Catford- New Cross and 8,000 and 6000 minimum homes respectively between 2001 and 2026.

The spatial core strategy promotes Creekside as a suitable location for new homes, employment and training opportunities. However the MEL designations (mixed employment land) sites are restricted to seven sites, including Strategic Industrial Land (SIL), which is earmarked for protection in the London Plan and the adjacent Sun and Kent Wharf sites directly to the north of the Faircharm Estate.

It is considered a missed opportunity by the Council to exclude Creekside from the strategic MEL area allocated for Sun and Kent Wharfs to the immediate north.

There are several reasons for this:

1. the exclusion of Creekside from the potential to provide mixed use development, will significantly damage investment opportunities for this area, and subsequently inhibit the ability of this area to meet core policy aspirations of providing SME business space for local employment and provision for the creative industries over the lifetime of the Core Strategy, and beyond.
2. Using Faircharm Estate as a site specific example, the current business space at the site is at the end of its economic life. It is not economically viable to refurbish the existing buildings and therefore for the SME business space to remain market efficient and competitive, a complete redevelopment of the site is required. Workspace own and manage SME business space across the London and have a proven model of regenerating such Estates through the inclusions of mixed-use floorspace, to subsidise and improve business floorspace provision on sites, whilst keeping that provision affordable to a wide range of occupiers.
3. The Core Strategy relies on the Employment Land Survey 2008 (ELS) survey when allocating employment sites. Concern is raised that the ELS does not properly consider Faircharm Estate, the role it plays within Creekside and the state of the current buildings on the site.
4. Creekside is also identified as an area for creative industries. However without significant investments buildings will not be suitable to provide the best space for creative industries. Without a clear, viable strategy for investment it is unclear how the Estate, with ageing

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building stock, can attract these creative industries and support their growth and retention within the local area over the lifetime of the Core Strategy.

5. The current options for the core strategy, spatial policies, predominantly exclude LEL from the potential benefits of cross subsidisation and the higher value uses enabling lower value uses to be provided.

Our client's representations are summarised as follows:

- The allocation of Creekside as an LEL site is not supported, but should be within a wider MEL designation incorporating Creekside and Sun and Kent Wharfs.
- The ELS recognises that mixed use can assist with the deliverability of commercial space (Para 8.14) and that mixed use is often suitable for office/workspace uses (8.17). Therefore LEL designations should not be excluded via core strategy policy.

The benefits of mixed use development and cross subsidisation are cautiously embraced within the Core Strategy, however there appears to be an underlying assumption that to encourage mixed use on employment sites, will inevitably reduce the level of employment provision in the borough. This simply is not the case, the core objectives of the core strategy should be to facilitate development, meet local housing need and increase local employment and training opportunities in the Borough. Forthcoming DPD and Site allocations will provide policy criteria to ensure employment land/floorspace is protected, whilst enabling development as part of higher density and sustainable development opportunities.

We would be grateful for your confirmation that the above representations have been received and will be considered ahead of Submission of the Core Strategy to the Secretary of State.

Yours faithfully

Rolfe Judd Planning

PP -

Jan Donovan
Rolfe Judd Planning

cc. Ian Dubber Workspace Group PLC

06/04/10 14:40

Comments

Core Strategy - proposed submission version (19/02/10 to 06/04/10)

Comment by	Workspace Group PLC ()
Comment ID	4
Response Date	31/03/10 17:09
Consultation Point	6.22 Paragraph (View)
Status	Submitted
Submission Type	Web
Version	0.4

1. Do you consider the Core Strategy is legally compliant? . No

2. Do you consider the Core Strategy is Sound? The considerations in relation to the DPD being 'Sound' are explained in the Notes to be found in the Supporting Documents section of the Main consultation page for this document.

3. Do you consider the Core Strategy is unsound because it is not:

4. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The release of several areas from the Surrey Canal Road Strategic Industrial Land for Mixed Use redevelopment, notably Oxestalls Road, Surrey Canal Road, Grinstead Road and Arklow Road is contrary to the London Plan.

5. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at Question 3 above where this relates to soundness. YOU WILL NEED TO SAY WHY THIS CHANGE WILL MAKE THE DPD LEGALLY COMPLIANT OR SOUND. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Oxestalls Road, Surrey Canal Road, Grinstead Road and Arklow Road should be retained Strategic Industrial Land (SIL) to ensure the Strategy is in conformity with the London Plan. Alternative

employment sites within the Deptford Creek/Riverside Opportunity Area, such as Creekside, should be considered for mixed-use redevelopment to subsidise much-needed regeneration and improvements to the employment provision.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? . Yes, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is important the Inspector assesses the suitability of alternative employment sites in the area for mixed-use opportunities, including Creekside.

Comment by	Workspace Group PLC ()
Comment ID	5
Response Date	31/03/10 17:21
Consultation Point	Table 3.2 Mixed Use Employment Locations (MELs) (View)
Status	Submitted
Submission Type	Web
Version	0.3

1. Do you consider the Core Strategy is legally compliant? . No

2. Do you consider the Core Strategy is Sound?
The considerations in relation to the DPD being 'Sound' are explained in the Notes to be found in the Supporting Documents section of the Main consultation page for this document.

3. Do you consider the Core Strategy is unsound because it is not:

4. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

The release of several areas of from the Surrey Canal Road Strategic Industrial Land for Mixed Use redevelopment, notably Oxestalls Road, Surrey Canal Road, Grinstead Road and Arklow Road is contrary to the London Plan.

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Oxestalls Road, Surrey Canal Road, Grinstead Road and Arklow Road should be retained Strategic Industrial Land (SIL) to ensure the Strategy is in conformity with the London Plan. Alternative

SOUND. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Re-word Paragraph 3 to read: 3. All new development comprising the creation of new dwellings will need to comply with the Code for Sustainable Homes, as set nationally. This will ensure the Core Strategy is consistent with national policy, and more importantly, deliverable.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? . No, I do not wish to participate at the oral examination

Comment by	Workspace Group PLC ()
Comment ID	7
Response Date	01/04/10 14:28
Consultation Point	Spatial Policy 2 Regeneration and Growth Areas (View)
Status	Submitted
Submission Type	Web
Version	0.3

1. Do you consider the Core Strategy is legally compliant? . Yes

2. Do you consider the Core Strategy is Sound? The considerations in relation to the DPD being 'Sound' are explained in the Notes to be found in the Supporting Documents section of the Main consultation page for this document. . No

3. Do you consider the Core Strategy is unsound because it is not: . (1) Justified
. (2) Effective

4. Please give details of why you consider the DPD is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the DPD, please also use this box to set out your comments.

Workspace PLC own and manage the Faircharm Estate (Lower Creekside). The site is recognised in the Employment Land Survey (Roger Tym) as a hub for the Creative Industries, however the ELS fails to assess the condition of the buildings currently or over the lifetime of the Core Strategy period to 2026. The existing business space at the Faircharm Estate is coming towards the end of its economic life, accordingly rents are cheaper than the market average and this is what has driven the creative industries to the area. However there is need for significant investment to secure the long-term future of the Estate and upgrade the business accomodation for existing tenants. Workspace has discussed the Estate with the Planning Policy Team, subsequent to representations to the Preferred Options (February 2009) and has demonstrated that the refurbishment of the Estate, in its current form, is not economically viable, without the introduction of a higher land value use or the site to act as enabling developement or raising rents, which existing tenants are likely to find unpalatable. Given the condition of the buildings, an opportunity to retain the existing creative industries hub on the site will be lost within the lifetime of the Core Strategy with the current policy approach and tenants will need to relocate (possibly outside the borough). Policy needs to reflect the realities of the site and permit mixed-use redevelopment, in line with the adjacent Kent and Sun Wharf site.

5. Please set out what change(s) you consider necessary to make the DPD legally compliant or sound, having regard to the test you have identified at Question 3 above where this relates to soundness. YOU WILL NEED TO SAY WHY THIS CHANGE WILL MAKE THE DPD LEGALLY COMPLIANT OR SOUND. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Creekside should be redesignated from a Local Employment Location (LEL) to a Mixed Use Employment Location (MEL) in line with the Kent and Sun Wharf site. Re-designation will enable employment accommodation on the Faircharm Estate to be upgraded and modernised to strengthen the area as a Creative Industries hub in the long-term and meet Core Strategy objectives. More importantly, a quantum of enabling development for higher use values, such as residential, would effectively cross-subsidise the employment space to enable existing and future tenants to flourish, in line with the existing rental structure.

6. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? Yes, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is important the Inspector considers the full evidence behind the proposed redesignation approach and why it would help deliver wide Core Strategy objectives. Workspace PLC are happy to re-submit appraisal evidence, if requested by the Inspector.