



Date: 22/03/2021

By email: localplan@lambeth.gov.uk

Dear Sir / Madam,

RE: DRAFT REVISED LAMBETH LOCAL PLAN 2020 MAIN MODIFICATIONS

Thank you for providing the opportunity to comment on the Draft Revised Lambeth Local Plan 2020 Main Modifications.

Please note that our representations below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a significant landowner in the borough only and are separate from any representations that may be made by TfL in its statutory planning role and / or as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL CD have engaged through the Local Plan preparation process and have submitted the following representations:

- Lambeth Local Plan Partial Review (December 2017)
- Draft Revised Lambeth Local Plan (December 2018)
- Pre-Submission Publication of the Draft Revised Lambeth Local Plan (March 2020)
- Response to MIQs (Matter 2,3,4,8 and 9) (October 2020)

MM38

TfL CD have previously raised concerns regarding the cumulative viability impact that is likely to occur when mixed-use schemes are required to deliver affordable workspace in addition to other requirements such as affordable housing and community infrastructure levy. Many of TfL's schemes already have high abnormal costs associated with requirements for new infrastructure and safeguarding our operational requirements and so additional costs are likely to significantly impact on what can be delivered. Policy DFI of the London Plan states that "*applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements*" as opposed to the provision of affordable workspace.

MM95

It is noted that Policy ED15 (b) (i) has been amended to refer to the 25% figure being a target rather than a minimum and it is considered this wording is more acceptable.

Minor Changes

The schedule also covers minor changes, but it does not appear that a factual error that TfL CD have raised in our previous representations has been taken into account. In Annex 11, with respect to the height deemed appropriate in principle at Waterloo Roundabout (Location W3), it should read 130m AOD, not 30m AOD as currently drafted.



Concluding Remarks

We hope that these representations are helpful but if you need any further information or would like to discuss any of the issues raised in our representations, please do not hesitate to contact me. We look forward to being kept up to date with your programme going forwards.

Yours faithfully,

Chris Ridout

Assistant Planner, Transport for London Commercial Development