

By email only

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Dear Sir/Madam,

Lambeth Local Plan proposed modifications – January 2021

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (Property) to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on the proposed modifications to Lambeth Local Plan.

The Mayor first published his draft new London Plan for consultation on 1 December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Publication London Plan was then prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The final version of the new London Plan was published on 2 March 2021, and now forms part of Lambeth's Development Plan.

Local Plan policies should be developed in line with relevant draft London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

Our comments on specific modifications and suggestions for amendments or wording improvements are detailed below. We look forward to working with the Council to finalise the Local Plan as it moves towards adoption.

Yours faithfully,

Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

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Appendix A: Specific comments on Lambeth Local Plan proposed modifications

Reference	Track change/comment
PC006	We reiterate the point made in response to the Local Plan that TfL is not actively progressing the extension of the Tram network to Crystal Palace as it is unlikely to be good value for money. The amended wording could have been explicit that there is no commitment to progress the project, but we accept the proposed change which is in accordance with the Statement of Common Ground agreed between Lambeth and the GLA.
PC008	We welcome the additional reference to Blackfriars and the reference to Crossrail 2 and metroisation being required to meet future demand.
PC013	We welcome clarification included within this paragraph setting out the approach to planning obligations.
PC046	We welcome the addition of a reference to Vision Zero in policy T2.
PC047	Although we do not support the proposed change to allow pool cycles to replace part of the required cycle parking in student accommodation, we welcome confirmation that this exception would only apply to student accommodation and that pool bikes would be additional to cycle parking requirements in all other developments. It would be helpful for accompanying text to explain how the balance between the two will be decided and how many pool cycles will be provided in relation to student bed spaces. Any pool cycles would need to be freely available at all times to ensure students have ongoing, ad hoc access to them. Demand would also need to be continuously monitored and any shortfall in provision made up.
PC048	We do not agree that providing folding bikes with storage offers a suitable alternative to cycle parking because they will not offer access to cycle use for future residents. However, provision of folding bikes is welcomed where it is an addition to the normal cycle parking requirements. It is not clear how it would be determined whether there would be a high level of cycle-rail trips from a particular development as simple proximity to rail stations would not provide an accurate guide.

Reference		Track change/comment
PC049		We welcome the addition of a reference to Vision Zero and cycle hire business accounts in policy T3.
PC216		Although TfL does not agree that pool cycles can substitute for required cycle parking, it is recognised that they can be a useful additional service. To achieve the benefits suggested for pool cycles they should be additional to cycle parking, freely available to use at all times and at no cost to the users. Demand for pool cycles would need to be continuously monitored and any shortfall in provision made up.
PC052		We welcome the changes to paragraph 8.18 including the reference to London Cycling Design Standards.
PC053		We welcome the clarification that cycle hire caters for a different market and that it should not be provided as a replacement for cycle parking.
PC054		We welcome clarification that pool cycles should be available free of charge for a defined period.
PC055		We reiterate the point made in response to the Local Plan that TfL is not actively progressing the extension of the Tram network to Crystal Palace as it is unlikely to be good value for money. The amended wording could have been explicit that there is no commitment to progress the project, but we accept the proposed change which is in accordance with the Statement of Common Ground agreed between Lambeth and the GLA.
PC056		We welcome the minor wording change.
PC057		We welcome the clarification of policy T7 which requires permit free development in PTAL 4 to 6 in addition to locations within an existing or planned CPZ.
PC058		We welcome the minor wording change.
PC060		We welcome clarification of what is intended by referring to very good or good public transport access but we would suggest that use of subjective terms such as good or very good is inappropriate because they will depend on the spatial context and it is better to simply refer to the PTAL in numerical terms. References in this paragraph and elsewhere, should distinguish public transport access from accessibility, which often refers to physical or step free accessibility.

Reference		Track change/comment
PC061		We welcome the additional references to clarify the approach to providing parking for disabled persons in paragraph 8.36.
PC063		Although we welcome clarification that car clubs are particularly relevant in areas less well served by public transport, the wording could be clearer that in areas that are well served by public transport, car clubs may not be appropriate because they can encourage additional vehicle trips. For this reason, the London Plan states that car clubs are not appropriate in the Central Activities Zone.
PC065		We welcome the addition of a reference to the Fleet Operator Recognition Scheme in policy T8.
PC066		We welcome the encouragement of servicing by cycle and other non-motor vehicular modes in policy T8.
PC067		We welcome the reference to minimum Direct Vision Standards in paragraph 8.46.
PC069		We welcome clarification about the role of taxis in paragraph 8.47.
PC082		We welcome the reference to London Cycling Design Standards.
PC083		We welcome clarification of when on road cycle stores are acceptable.
PC084		We welcome clarification that all cycle storage should be at least compliant with the minimum standards set out in the London Plan.
PC092		We welcome the replacement of 'car trips' by 'motor vehicle trips.'
PC099		We welcome the updated completion dates for the Northern line extension.
PC109		We note the proposed change in wording that refers to the Oval to Streatham Cycleway as 'expected'. Although not yet designated formally as a Cycleway, temporary changes to the A23 between Oval and Streatham will be implemented to improve conditions for cyclists, pedestrians and public transport users.

Reference		Track change/comment
PC112		Although the wording has been modified to refer to the potential re-introduction of two-way working, we had originally requested that reference to two-way working be removed completely to allow for other options that may be more effective. However, we accept the proposed change which is in accordance with the Statement of Common Ground agreed between Lambeth and the GLA.
PC114		We note the proposed change in wording that refers to the Oval to Streatham Cycleway as 'expected'. Although not yet designated formally as a Cycleway, temporary changes to the A23 between Oval and Streatham will be implemented to improve conditions for cyclists, pedestrians and public transport users.
PC119		We welcome the additional sentence that refers to exploring the potential for expansion of cycle hire to be funded through developer contributions.
PC128		We reiterate the point made in response to the Local Plan that TfL is not actively progressing the extension of the Tram network to Crystal Palace as it is unlikely to be good value for money. The amended wording could have been explicit that there is no commitment to progress the project, but we accept the proposed change which is in accordance with the Statement of Common Ground agreed between Lambeth and the GLA.
PC132		We welcome the correction to the glossary to define PTAL as Public Transport Access Level.