

Statement of Common Ground between London Borough of Lambeth and Mayor of London (SCG01)

21 May 2020

Context

This is a statement of common ground between the London Borough of Lambeth and the Mayor of London to support the examination of the Draft Revised Lambeth Local Plan Proposed Submission Version (DRLLP PSV) January 2020 and associated Proposed Changes to the Policies Map (PCPM) January 2020.

Lambeth published the DRLLP PSV and PCPM under Regulation 19 of the Town and Country Planning (Local Plans) (England) Regulations 2012 between 31 January and 13 March 2020.

In accordance with Section 24(4)(a) of the Planning and Compulsory Purchase Act 2004 and Regulation 21 of the 2012 Regulations, on 31 January 2020 Lambeth requested the opinion in writing of the Mayor of London as to the general conformity of the DRLLP PSV and PCPM with the Mayor's London Plan, which is the spatial development strategy for London.

The Mayor provided his written statement of general conformity with the London Plan on 13 March 2020 (R054). This states that overall the Mayor consider that Lambeth's Regulation 19 Draft Local Plan is in general conformity with the London Plan, but sets out a number of comments on different aspects of policy, including detailed comments from Transport for London (R048).

The Mayor's statement notes that, following publication of the Intend to Publish version of the new London Plan on 17 December 2019, the Mayor had received the response from the Secretary of State to his Intend to Publish London Plan (received 13 March 2020) and was considering his response.

The Mayor subsequently wrote to the Secretary of State on 24 April 2020 stating he wished to initiate discussions about amendments to the modifications set out in the direction in order to be able to publish the London Plan as quickly as possible.

Lambeth's response to the Mayor's comments

Lambeth has considered in detail each of the Mayor's comments on the DRLLP PSV and associated PCPM, including those from Transport for London. This has also involved considering the implications for Lambeth's plan of the Secretary of State's direction on the Intend of Publish London Plan.

Lambeth's response to each of the comments is set out in Table 1 and Table 2 at Appendix 1. Some changes to the wording of the DRLLP PSV are proposed (shown in **brown**), also included in Appendix 1.

Mayor's response to Lambeth

Following continued constructive and collaborative working with Lambeth, proposed amendments have been made to the draft Local Plan which bring it more closely in line with the emerging London Plan and the current London Plan. Many of the comments and suggestions in the Mayor's response to Lambeth's Regulation 19 consultation have been positively addressed, are welcomed and have been clearly set out in Table 1.

Waste

The Mayor welcomes the recent collaborative working on this matter and the positive policy commitment from Lambeth to contribute towards the Mayor's ambition that London be self-sufficient in its management of waste and to provide the capacity to meet its waste apportionment targets as now set out in draft Policy EN7. He also welcomes that Lambeth will encourage the intensification of capacity on existing sites, where appropriate. The amendments proposed by Lambeth provide clarity on the monitoring of waste management capacity and the actions to be taken should that monitoring indicate that the apportionment is unlikely to be met, which is strongly supported.

GLA officers note the borough's current shortfall in its capacity to meet its apportionment targets and are happy to continue working constructively with Lambeth to help monitor and seek solutions to meeting apportionment should capacity not come forward during the life of the plan.

Gypsies and Travellers

The Mayor will confirm his position regarding Gypsies and Travellers following discussions with the Secretary of State regarding his Directions.

Industry

The Mayor strongly welcomes Lambeth's proposed approach that aims to achieve a sufficient supply of land and premises in Lambeth to meet current and future demands for industrial and related functions, based on the Mayor's strategic evidence, Lambeth's industrial land audit and Lambeth's location in the Central Services Area where industrial functions provide essential services to the Central Activities Area (CAZ).

London depends on a wide range of industrial, logistics and related uses that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. A sufficient supply of industrial capacity is essential for good growth.

The Mayor considers that Lambeth's proposed amendments are essential to address part of his concerns regarding how the Lambeth will achieve meeting its waste apportionment capacity from 2021.

The Mayor considers the revised policy and text are more aligned with the emerging London Plan and its evidence and are welcomed.

It should be noted that the Mayor is in continuing discussions with the Secretary of State regarding the Directions to the London Plan.

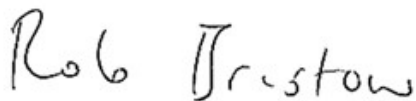
Transport for London's response to Lambeth

The Mayor and TfL warmly welcome Lambeth's approach to transport, and the council's willingness to take on board most of the comments set out in the appendix below. Lambeth's approach to car parking is particularly supported and is critical to making growth in Lambeth sustainable and minimising the congestion, emissions, road danger and health impacts generated by new development in the borough.

Statement of agreement

LB Lambeth and the Mayor agree that the position set out in Tables 1 and 2 at Appendix 1 of this statement provide an appropriate response to the Mayor's comments in his statement of 13 March 2020. Lambeth will therefore put forward the proposed changes to wording during the examination of the DRLLP PSV.

Signed for London Borough of Lambeth by:



Rob Bristow

Director Planning Transport and Sustainability

London Borough of Lambeth

Date: 21 May 2020

Signed for the Mayor of London by:



Debbie Jackson

Director – Built Environment

Greater London Authority

Date: 21 May 2020

Appendix 1

This appendix includes two tables:

Table 1 – LB Lambeth response to the Mayor’s comments on the DRLLP PSV and PCPM dated 13 March 2020 (all comments other than those from Transport for London)

Table 1 is followed by proposed changes to policy wording arising from the response set out in Table 1.

Table 2 – LB Lambeth response to Transport for London’s comments on the DRLLP PSV dated 13 March 2020

Proposed changes to policy wording arising from the response set out in Table 2 are shown within the table.

Table 1 – LB Lambeth response to the Mayor’s comments on the DRLLP PSV and PCPM dated 13 March 2020 (all comments other than those from Transport for London)

Table 1 is followed by proposed changes to policy wording arising from the response set out in Table 1.

Item	Mayor’s comment	Lambeth response	Proposed change
Myr1	General Contextually, the draft Local Plan should set out clearly on maps, its relationship with the Opportunity Areas (OAs) that lie within the borough’s boundaries, including Vauxhall, Nine Elms and Battersea (VNEB) and the Waterloo OAs, establishing the precise extent of each.	The two Opportunity Areas are clearly identified on the maps associated with the place-specific policies PN1 Waterloo and PN2 Vauxhall (see pages 337 and 362 of the DRLLP PSV), as well as being shown as growth areas on the key diagram. The precise extent of the Opportunity Area is also defined on the existing Local Plan Policies Map, which is not proposed to be changed in this respect (and is therefore not mentioned in the Proposed Changes to the Policies Map document).	No change.
Myr2	The draft Local Plan should also reflect the borough’s intention to contribute towards the delivery of the indicative targets for 18,500 new homes and 18,500 new jobs for the VNEB OA and for 1,500 new homes and 6,000 new jobs for the Waterloo OA as set out in Table 2.1 of the Intend to Publish London Plan.	The indicative targets in DLP ItP Table 2.1 for new homes and new jobs in the two OAs in Lambeth are clearly referenced in paragraphs 11.1 and 11.18 (Waterloo and Vauxhall respectively).	No change.
Myr3	Lambeth’s geographical relationship with the Central Activities Zone (CAZ) means that it is located in the Central Services Area and the draft Local Plan should note this and establish what this means in terms of the borough’s overarching spatial strategy.	Noted. A reference will be added.	See proposed amended wording for Policy ED3 and supporting text below, showing proposed changes to wording in red.

Item	Mayor's comment	Lambeth response	Proposed change
Myr4	As currently drafted the Mayor has concerns over the approach to planning for waste capacity in the borough and how this will be achieved. Greater detail on this matter is provided later in this letter.	<p>Lambeth's proposed approach to planning for waste and addressing the Draft London Plan waste apportionment was fully set out in the Draft Revised Lambeth Local Plan consulted on under Regulation 18 between October and December 2018. The supporting evidence base was also published for comment at that time. Lambeth notes that the Mayor did not make any comment at all about Lambeth's proposed approach to waste in his response consultation on the Draft Revised Lambeth Local Plan under Regulation 18 in December 2018. Lambeth therefore concluded that the Mayor was happy with the proposed approach and did not seek to discuss this issue further with the Mayor's team prior to proceeding to Regulation 19 pre-submission publication.</p> <p>That said, Lambeth has considered the Mayor's comments at this stage and the response is set out below (in response to the more detailed points raised under waste).</p>	See below under more detailed response to points about waste.
Myr5	<p>Housing</p> <p>Lambeth sets out its housing target up to 2029 which is in accordance with the Intend to Publish London Plan, but should note that beyond that period if a target is required it should be based on the 2017 Strategic Land Availability Assessment (SHLAA) findings, local evidence of housing capacity and by rolling forward the borough's small housing sites figure in accordance with paragraph 4.1.12 of the Intend to Publish London Plan.</p>	Noted. A reference will be added.	See proposed amended wording for paragraph 3.3 below, showing proposed changes to wording in red.

Item	Mayor's comment	Lambeth response	Proposed change
Myr6	<p>Affordable Housing</p> <p>Lambeth's proposed approach towards off-site and cash-in-lieu contributions to affordable housing are set out clearly at paragraphs 5.22-5.25 and reinforces paragraphs 4.4.9 and 4.4.10 of the Intend to Publish London Plan and is welcomed by the Mayor. However, Lambeth should note that residential planning proposals which include off-site affordable housing and cash-in-lieu contributions for affordable housing are only suitable for the Viability Tested Route as set out at paragraphs 2.9 and 2.62 of the Mayor's Affordable Housing and Viability Supplementary Planning Guidance. Lambeth should therefore amend paragraph 5.28 of the draft Local Plan in accordance with the Intend to Publish London Plan and the Mayor's Affordable Housing and Viability SPG.</p>	<p>In the Mayor's response to consultation on the Draft Revised Local Plan at Regulation 18 (December 2018), he stated:</p> <p><i>"in order to facilitate the delivery of small sites, Part C of Draft New London Plan Policy H6 states that where it is agreed by the borough, small housing developments (schemes providing up to 25 homes) may follow the Fast Track Route where they meet the relevant threshold level off-site or as an in-lieu payment. Lambeth should note the differences in approach to the provision of off-site and in lieu contributions towards affordable housing as they relate to major, minor and small housing development."</i></p> <p>The deletion of text from Draft London Plan policy H5C and paragraphs 4.6.8A and 4.6.8B in the Intend to Publish version (December 2019) has changed this position. Paragraphs 5.20, 5.21 and 5.28 of the DRLLP PSV therefore need to be amended.</p> <p>However, Lambeth wishes to continue to allow for a Fast Track approach to applications involving 10-25 units that are able to provide the threshold level of affordable housing as a PIL, because this is considered to be a more effective and deliverable approach to securing affordable housing in this size of scheme. In Lambeth's view, subject to the amendments to DRLLP PSV wording proposed, this local approach would still</p>	<p>See proposed amendments to paragraphs 5.20, 5.21 and 5.28 below, with changes to wording shown in red.</p>

Item	Mayor's comment	Lambeth response	Proposed change
		be in general conformity with the Intend to Publish London Plan.	
Myr7	Draft Local Plan Policy H2a)ii) should also be amended so that it clearly follows the Mayor's Threshold Approach to affordable housing. As currently drafted paragraph 5.20 states that proposals of 25 dwellings or more must provide affordable housing on-site which was in line with the Mayor's previous small sites policy. However, the draft policy should be amended so that it applies to all proposals of 10 or more dwellings bringing it in line with the Intend to Publish London Plan.	As above. This affects both paragraphs 5.20 and 5.21 of the DRLLP PSV, which therefore need to be amended.	See proposed amendments to paragraphs 5.20 and 5.21 below, with changes to wording shown in red.
Myr8	Paragraph 5.26 of the draft Local Plan suggests that there is flexibility in the tenure mix for proposals that exceed the 35% affordable housing threshold. For clarification, this paragraph should be amended to make it clear that there is only flexibility on the additional affordable housing which exceeds the 35% threshold and Lambeth should recognise the Mayor's preference for Social Rent and London Affordable Rent.	In Lambeth's view, paragraph 5.26 as drafted already makes this clear. It states "If the level of affordable housing provided exceeds the threshold level, there is scope for flexibility in the tenure of the affordable units provided <i>above</i> the threshold provided these homes are genuinely affordable as defined in London Plan policy H6...."(emphasis added). However, further clarification will be added in response to the Mayor's comment.	See proposed amendments to paragraphs 5.20 to 5.26 below, with changes to wording shown in red.
Myr10	Office development The Intend to Publish London Plan in Policy E1C and D directs new office development to the Central Activities Zone (CAZ) and the borough's town centres, taking into account the Town Centre Network office guidelines set out in Table A1.1 of the Intend to Publish London Plan and Figure A1.4 in Annex 1. Lambeth should seek to amend draft Local Plan Policy ED1b) of the draft Local Plan to bring it in line with the Intend to Publish London Plan.	There has been no change in this aspect of policy between the Draft Revised Lambeth Local Plan consulted on under Regulation 18 and the DRLLP PSV published at Regulation 19. The Mayor did not raise this point in his response to consultation on the Draft Revised Lambeth Local Plan under Regulation 18 in December 2018, and Draft London Plan policy E1 was not changed in the Intend to Publish version. Lambeth therefore did not seek to discuss this policy with the Mayor or amend the approach prior to Regulation 19.	See revised version of DRLLP PSV policy ED1 below showing proposed changes to wording in red.

Item	Mayor's comment	Lambeth response	Proposed change
		Nevertheless, in response to the Mayor's comment at Regulation 19, Lambeth will amend the wording of DRLLP PSV policy ED1.	
Myr11	<p>Industrial Land</p> <p>Lambeth is a 'retain capacity' borough, as set out in Table 6.2 of the Intend to Publish London Plan and its reflection in the draft Local Plan is welcomed by the Mayor. However, emphasis should be provided regarding Lambeth's location within the central services area (CSA) and what this means in terms of serving the functioning of the CAZ.</p>	Noted, this reference will be added.	See revised version of DRLLP PSV policy ED3 and supporting text below, showing proposed changes to wording in red.
Myr12	Due to its location within the CSA, Lambeth's policy should be more focussed on prioritising B2 and B8 uses over and above B1(c) uses so that it is in accordance with paragraph 6.4.10 of the Intend to Publish London Plan. This includes 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions.	<p>The Secretary of State's direction to the Mayor issued on 13 March 2020 directs deletion of paragraph 6.4.10 from the Draft London Plan ItP. However, it replaces it by a new paragraph 6.4.7 that replicates the same wording about the Central Service Area.</p> <p>There is no reference to prioritisation of B2 and B8 uses over and above B1(c) uses in the Draft London Plan. In practice prioritisation of B2 and B8 over B1(c) uses would be difficult to achieve, because (given the definition of industrial uses in Draft London Plan ItP policy E4) there would be no policy basis for refusing a proposal for B1(c) in a KIBA that was otherwise acceptable.</p> <p>We have nevertheless sought to emphasise in the proposed revised supporting text to DRLLP PSV the implications for Lambeth's location in the CSA and the particular types of industrial use this will require.</p>	See revised version of DRLLP PSV policy ED3 and supporting text below, showing proposed changes to wording in red.

Item	Mayor's comment	Lambeth response	Proposed change
Myr13	<p>The Mayor welcomes and supports Lambeth's clear intention to resist new office development proposals in the borough's LSIS at paragraph 6.30 of the draft Local Plan. The approach could allow for the relocation of existing office developments to the borough's town centres in accordance with the Mayor's office guidelines set out in Table A1.1 of the Intend to Publish London Plan and in accordance with Policy E1 of the Intend to Publish London Plan.</p>	<p>Noted.</p> <p>Lambeth also notes Draft London Plan ItP policy E1E, which states that existing viable office floor-space capacity in locations outside the areas identified in Part C should be retained, supported by borough Article 4 directions to remove permitted development rights where appropriate.</p>	<p>No change.</p>
Myr14	<p>Lambeth's strategic approach towards the management of its industrial land is set out more clearly in its Review of Key Industrial Business Areas (KIBAs) (December 2019) than it currently is in the draft Local Plan. The findings of this evidence and the elements which Lambeth are intending to implement as part of their strategy should be incorporated clearly in the Local Plan itself and should preferably be set out clearly in a policy. The Review of the borough's KIBAs recommends the de-designation of one KIBA at Freemans and the designation of four new ones (currently non-designated industrial sites) at Acre Lane, Belinda Road, Knolly's Yard and Parade Mews. There are also plans for the partial de-designation of seven designated industrial sites (Clapham Park Hill, Hackford Walk, Montford Place – Beefeater/Oval Gasworks, Park Hall Trading Estate, Stannary Street, West Norwood Commercial Area and Wandsworth Road) and the expansion of two others (Clapham North Industrial Estate and Durham Street/Oval Way). This consolidation of industrial land within Lambeth would result in the overall loss of 0.69ha of</p>	<p>Noted. Clarification will be added.</p>	<p>See revised version of DRLLP PSV policy ED3 and supporting text below, showing proposed changes to wording in red.</p>

Item	Mayor's comment	Lambeth response	Proposed change
	designated industrial land. The two new proposed KIBAs are already in industrial use and therefore the result of this strategy would be a net loss of 3.21ha of industrial land.		
Myr15	As the borough is a 'retain capacity' one and should therefore apply the principle of 'no net loss' of industrial floor-space capacity, the Mayor would encourage Lambeth to set out the ability of the borough's remaining industrial land to accommodate greater amounts of industrial floor-space capacity in accordance with paragraph 6.4.10 of the Intend to Publish London Plan.	This comment has been superseded by the Secretary of State's direction to the Mayor issued on 13 March 2020.	No change.
Myr16	With regards to Table 4 of the Policies Map it is unclear if the intensification of these KIBAs is expected to deliver additional industrial capacity or simply to allow co-location with residential development.	As stated in the table, the approach to industrial intensification and co-location will follow Draft London Plan policy E7B. This is also stated in the supporting text to DRLLP PSV policy ED3 (as proposed to be amended - see above and attached).	No change.
Myr17	<p>Waste</p> <p>The overall approach to how waste needs will be met would benefit from further clarification in both the policy and supporting text, particularly in relation to the overall proposed approach to net self-sufficiency and how this will be achieved, both in terms of waste imports and exports and how this relates to the waste management capacity gap that has been identified.</p>	<p>Exports from and imports into Lambeth are not a measure of Lambeth's net self-sufficiency.</p> <p>Net self-sufficiency means providing enough waste management capacity to manage the <u>equivalent</u> of the waste need in Lambeth, while recognising that some imports and exports will continue. Lambeth's waste need is set out in para 9.65 of DRLLP PSV Policy EN7.</p> <p>Net self-sufficiency by 2026 is a London-wide target (set out in Draft London Plan ItP Policy S18) and Lambeth will contribute to this by planning to meet its apportionment target and planning for identified waste needs. (This point is discussed further below.)</p>	See revised EN7 and supporting text below - new policy clause ia) added after i) and new para 9.81 referencing monitoring indicators for waste

Item	Mayor's comment	Lambeth response	Proposed change
		<p>9.8.12 states that in order to meet the Mayor's policy commitment of net self-sufficiency by 2026 there needs to be a reduction in exports or an increase in imports in the lead up to 2026. Lambeth's Waste Evidence Base (Table 3.3) shows that during 2013-2017 73%-93% of waste exported from Lambeth was received at facilities elsewhere in London. If excavation waste is removed from the exports, because it does not form part of the net self-sufficiency target, this rises to 87%-97% of waste exported from Lambeth being received at facilities elsewhere in London. The Waste Evidence Base will be updated to incorporate this information.</p> <p>Inclusion of DRLLP PSV monitoring indicator IND26 will result in annual monitoring and reporting of waste exports and their destinations so Lambeth's continuing contribution to London's target of net self-sufficiency will be known. A reference to the monitoring indicators for waste can be added to the supporting text.</p>	
Myr18	<p>Lambeth's waste evidence highlights gaps in capacity to manage apportioned waste and all other waste streams over the plan period, amounting to an overall shortfall in the ability to manage 136,631 tonnes of waste by 2036. According to the evidence this equates to an additional requirement for 2.3ha of land in order to meet identified need over the plan period. The evidence establishes a waste capacity deficit from 2021, for 119,638 tonnes across all waste streams, or an equivalent need for 2ha of land.</p> <p>Lambeth's draft Local Plan policy should clearly set out the borough's commitment to being net-self-</p>	<p>The Land-take required to meet Lambeth's waste capacity gap is indicative only because the footprint for each type of technology and waste stream is different. Capacity is the key measurement.</p> <p>The target for net self-sufficiency by 2026 applies to all waste streams except excavation waste. This is a London-wide target (set out in Draft London Plan ItP Policy SI8) and Lambeth will contribute to this by meeting its apportionment target and planning for identified waste needs. However, while the Draft London Plan ItP requires development plans to identify sufficient capacity and land to meet apportionment</p>	<p>See revised EN7 and supporting text below - new policy clause ia) added after i) and clarification to table showing land take.</p>

Item	Mayor's comment	Lambeth response	Proposed change
	sufficient by 2026 and that the borough will meet its waste apportionment as set out in Table 9.2 of the Intend to Publish London Plan. This amounts to 143,000 tonnes up to 2021 and 152,000 tonnes by 2041.	targets, the Draft London Plan ItP 'encourages' rather than requires Boroughs to identify suitable additional capacity for waste, including those waste streams not apportioned by the Draft London Plan ItP, where practicable. Lambeth's DRLLP PSV has done this and will monitor capacity for CD&E waste. However, the Draft London Plan ItP does not require individual Boroughs to be net self-sufficient because the potential for Boroughs to bring forward waste capacity varies considerably. For example, it would be impossible for Westminster to be net self-sufficient.	
Myr19	The draft Local Plan states that existing waste facilities can help towards managing the boroughs waste. In order to facilitate this, draft Local Plan policy EN7 should encourage the intensification of existing sites to help meet the capacity gap. It would be useful to know how much of the capacity gap could be met through the intensification of existing waste sites.	Most of the sites within Lambeth are operating at a typical throughput for the type of facility and waste stream. There are potential opportunities to intensify waste sites in Lambeth. These include the site at Windsor Grove, the Powerday site and the Vale Street site, subject to planning permission. The Waste Evidence Base will be updated to incorporate this information.	See revisions to EN7 a) iii) and para 9.67 below.
Myr20	Lambeth has identified broad designated industrial areas (some of its KIBAs) where future waste facilities could come forward over the plan period to meet waste needs but individual sites have not been allocated for this purpose. The delivery of waste capacity is therefore reliant on appropriate sites within KIBAs becoming available and then coming forward for waste use over and above other industrial and storage uses. Given the urgency for capacity in the short-term there are concerns about the extent to which the current policy approach can deliver the capacity needed to address the identified capacity gap.	Draft London Plan ItP policy S18 says: "Development Plans should allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2". In Lambeth, as in most other waste planning authority areas, no individual waste sites were put forward by operators during the plan-making process (in response to a call for sites). Discussions with operators make clear that their preference is for as much flexibility as possible in the identification of land for waste management use, rather than allocation of specific sites	Additional wording to 9.69 – see revised wording below.

Item	Mayor's comment	Lambeth response	Proposed change
	<p>Lambeth could set out a policy basis, hierarchy or other mechanism to prioritise waste uses on the most suitable KIBAs that could potentially come forward for waste use.</p>	<p>that may not be available to them or meet their needs (potentially resulting in the blighting of sites). For these reasons, Lambeth has not proposed the allocation of individual sites for waste use, other than those already in waste use. However, areas suitable for waste facilities have been identified and this approach is therefore in line with Draft London Plan ItP policy SI8.</p> <p>The NPPW states "Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams." By identifying industrial areas suitable for waste facilities, Lambeth is creating sufficient opportunities to meet the borough's waste needs, so the approach is also consistent with national planning policy.</p> <p>While Lambeth has a responsibility to plan for and create opportunities for new waste capacity, it cannot build sufficient new capacity itself. Lambeth, as with every other London Borough, is relying on the market to bring forward waste capacity. The Waste Evidence Base assesses the ability of waste facilities to compete with other industrial uses and the amount of KIBA land which could come forward over the plan period (paras 5.10-5.17). This concludes that Lambeth has a reasonable prospect of delivering the facilities required to meet identified waste management need.</p> <p>Most waste uses mainly fall under the B use classes (mainly B2). It is not clear how Lambeth could, or if they should, prioritise some B uses over others on industrial</p>	

Item	Mayor's comment	Lambeth response	Proposed change
		<p>land. It is also not clear how a hierarchy of uses for Lambeth's KIBAs would bring forward waste uses if the market does not want to build them. It is not clear what other options the GLA has in mind to deliver the capacity needed to address the identified capacity gap. It is not clear why the GLA are questioning this approach to waste planning in Lambeth's Local Plan when the same approach is being taken by the vast majority of other London Boroughs.</p>	
Myr21	<p>Consistent with Intend to Publish London Plan Policy SI8B, ongoing collaboration to explore formal cross borough waste planning and apportionment pooling arrangements is encouraged. My officers will continue to work with Lambeth to ensure net self-sufficiency by 2026. Lambeth should monitor its waste capacity and if additional capacity does not come forward, Lambeth should produce a formal waste plan as soon as possible and, as a minimum before its next Local Plan review.</p>	<p>Lambeth's attempts to pursue joint working arrangements across the Western Riverside area are detailed in the Waste Evidence Base (1.10-1.23). In brief, the OPDC has resisted joint waste planning between the five Western Riverside waste planning authorities, including pooling of apportionment. Lambeth, along with Kensington & Chelsea and Wandsworth, has asked the GLA for help with the OPDC, a Mayoral Development Corporation, to enable joint waste planning across the area, but unfortunately no help has been forthcoming. Therefore joint waste planning in the Western Riverside area is not possible at this time.</p> <p>IND24 monitors New waste capacity (tonnes) by management type (recycling/composting, recovery, transfer and disposal) and type of wastes handled (HIC and CD&E).</p> <p>It is not clear what a "formal waste plan" would achieve that the waste evidence base and waste policy does not. Both meet all the criteria and requirements for waste planning.</p>	<p>Additional paragraph referencing monitoring indicators for waste – see revised wording below.</p>

Item	Mayor's comment	Lambeth response	Proposed change
Myr22	<p>Knolly's Yard</p> <p>The Mayor continues to support the designation of Knolly's Yard as LSIS and his earlier comments made in response to the Regulation 18 consultation remain relevant. This includes the point that due to the site's peculiarities he believes it should be included in the Local Plan as a site specific allocation which would highlight the requirements and priorities for delivering the site in a sustainable manner and one which aligns with the Intend to Publish London Plan.</p>	<p>Support noted. This site will be included in the forthcoming Site Allocations Development Plan Document.</p>	<p>No change</p>
Myr23	<p>Site 10 – 8 Albert Embankment</p> <p>It is noted that planning permission has now been granted (subject to S106) on this site which includes residential development and 10,766sqm of employment floor-space. If part of the site is to remain a KIBA, the site allocation should aim to deliver industrial floor-space. If the resulting development does not deliver industrial floor-space, the KIBA designation on this site should be removed.</p>	<p>Potential changes to the policy position for this site will only be considered if/when the intention to grant for the proposed development (which is still subject to a Secretary of State holding direction) becomes a full consent <u>and</u> this has been built out. This would need to take place through the forthcoming Site Allocations DPD and/or a future review of the Lambeth Local Plan.</p>	<p>No change</p>

Proposed changes to wording in the DRLLP PSV January 2020 – changes shown in red using underline for additions and strike-through for deletions.

Paragraph 3.3

Spatial Strategy

- 3.2 The Local Plan sets out the spatial strategy for Lambeth for a fifteen year period between ~~2015 and 2030~~ 2020 and 2035.
- 3.3 The new London Plan (~~July 2011~~) requires at least ~~41,950~~ 13,350 additional dwellings in Lambeth over the period ~~2011-24~~ 2019/20 to 2028/29, with an annual target of at least ~~4,195~~ 1,335 net additional dwellings per annum (dpa). These targets are derived from an assessment of housing sites within the borough, carried out as part of the London-wide Strategic Housing Land Availability Assessment (SHLAA 2017) / ~~Housing Capacity Study (2009)~~. The London Plan requires boroughs to roll forward the annualised average, until this is replaced by a new London Plan target. Lambeth's target over the 15-year Local Plan period is therefore ~~17,925~~ homes. This target increased as part of the London Plan Further Alterations published in 2015 and is a minimum target that boroughs are required to exceed. This will be addressed through an early review of the Lambeth Local Plan. The housing trajectory for this ten year period is included in Annex 13, along with the indicative housing requirement figures for the five designated neighbourhood planning areas in Lambeth (or the part of those cross-border areas that fall within Lambeth). If a target is required beyond the ten year period 2019/20 to 2028/29, it will be based on the 2017 SHLAA findings, local evidence of housing capacity and by rolling forward the borough's small housing sites figure in accordance with paragraph 4.1.12 of the London Plan.

Paragraphs 5.20 to 5.28

- 5.20 To be eligible for the Fast Track Route as set out in the London Plan, applications proposing 10 or more than 25 units (gross) must meet all of the following criteria:
- i) meet and exceed the relevant threshold level of affordable housing on site without public subsidy (subject to paragraph 5.28 below);
 - ii) be consistent with Lambeth's tenure split policy (H2(b)) up to the required threshold (although in accordance with London Plan policy H6B, the Fast Track Route is also available to applicants that elect to provide low cost rented homes in place of intermediate homes, provided the relevant threshold level is reached);
 - iii) meet other relevant policy requirements and obligations to the satisfaction of Lambeth (and the Mayor where relevant): this includes policies and obligations where relevant relating to dwelling size mix and housing standards; residential amenity space and children's play space; provision of employment floorspace and affordable workspace; town centre uses; mitigation of any visitor impacts; employment and training; provision of social infrastructure; transport and parking; air quality; open space and urban greening; zero and low carbon; sustainable design and construction; flood risk; sustainable drainage; sustainable waste management; and design; and
 - iv) demonstrate they have taken account of the strategic 50 per cent target in London Plan policy H4 and have sought grant where required to increase the level of affordable housing beyond 35 per cent.
- 5.21 Affordable housing is required on site in schemes providing more than 25 10 units (gross) and this is an essential requirement to be eligible for the Fast Track Route. Mixed-tenure developments are essential to provide the homes needed in Lambeth while creating mixed and balanced communities. In exceptional cases, where it can be demonstrated robustly and to the satisfaction of the council that this is not feasible in terms of site configuration and layout and the policies in the development plan, it may be provided off-site. Examples of circumstances in which off-site provision may be considered include where, having secured an alternative site, it would be possible to:
- secure a more mixed and balanced community

- secure a significantly higher level of provision than would otherwise be secured through on-site development
 - address priority needs more effectively, especially for affordable family housing tenure and house type
- 5.22 Consideration will only be given to off-site provision where an alternative site has been identified and it can be delivered as part of the application process through a planning obligation. In the interests of ensuring successful mixed and sustainable neighbourhoods, and in particular the promotion of community cohesion and social diversity, the site identified for off-site provision should be located in the borough, as near as practicable to the principal site and no further than one mile. It should be supported by appropriate social, physical and green infrastructure. Applications will be required to demonstrate that the design, layout and location of both sites will enable the developments to be embedded within the wider community. The off-site provision should be deliverable prior to the on-site market housing being completed.
- 5.23 Where off-site provision is proposed the percentages of affordable housing set out in Local Plan policy H2(a) shall be applied to the total of the on-site housing provision and the off-site housing provision. Further detail regarding calculating off-site provision is set out in the Mayor's Affordable Housing and Viability SPG 2017.
- 5.24 Where it is demonstrated to the satisfaction of the council that neither on-site nor off-site provision is appropriate, a payment in lieu may be accepted. This will be calculated on the basis of the approach set out in the Mayor's Affordable Housing and Viability SPG 2017 and the calculation of the proportion of affordable housing this would achieve should be based on land values within one mile of the application site. Contributions will be ring-fenced to secure additional affordable housing either on identified sites elsewhere in Lambeth or as part of an agreed programme for the provision of affordable housing in Lambeth.
- 5.25 Viability alone is insufficient justification for off-site affordable housing provision or a cash in lieu payment.
- 5.26 If the level of affordable housing provided exceeds the threshold level, there is scope for flexibility in the tenure of the **those** affordable units provided above the threshold **level**, provided these homes are genuinely affordable as defined in London Plan policy H6. These schemes can follow the Fast Track Route provided all other eligibility requirements are met.

- 5.27 For developments that provide 75 per cent or more affordable housing, it may be possible to consider a variation from the normal 70:30 tenure split for all of the affordable housing in the scheme. This will be considered on a case by case basis, having regard to the housing need met by the scheme and the level of public subsidy involved. The council will require all schemes proposing this approach to be viability tested, to ensure the level of genuinely affordable housing is maximised in every case.
- 5.28 The council acknowledges that schemes providing between 10 and 25 units (gross) may find it difficult to provide on-site affordable housing given the small numbers of units involved and difficulties in some cases in finding registered providers of affordable housing willing to manage them. In these cases, where a difficulty of this nature has been demonstrated to the satisfaction of the council (through evidence of contact made with registered providers), the council will consider proposals to ~~Where schemes proposing between 10 and 25 units (gross) provide the threshold level of affordable housing as an in lieu payment under the Fast Track route. (and are therefore eligible to follow the Fast Track route), the~~ . The value of an in lieu payment should be based on the relevant threshold as a percentage of on-site units. The payment in lieu should be calculated through two appraisals – one with the level of affordable housing required by policy and the other with 100 per cent market housing: the payment in lieu will equate to the difference between the two residual values. Applicants should use the methodology set out in Annex 10, making use of the online calculator provided on the council’s website.

Policy ED1 (a) and (b)

Policy ED1 ~~Large offices (greater than 1000m²)~~ Offices (B1a)

a). Proposals for large offices (greater than 1,000m² or more gross external area) will be supported in the Central Activities Zone, Vauxhall and Waterloo London Plan Opportunity Areas and Brixton and Streatham major town centres. Elsewhere, large office development will be supported ~~only~~ where the scale of the proposal is appropriate to its location and the PTAL level is 4 or above and subject to the sequential test in section 7 of the NPPF.

b). Proposals for smaller offices (up to 1,000m² gross external area) will be supported in the Central Activities Zone, Opportunity Areas and all town centres all locations, subject to other plan policies relating to the existing use of the land, environment, transport and design. Proposals for smaller offices outside of town centres will be subject to the sequential test in section 7 of the NPPF and other plan policies.

Policy ED3 Key Industrial and Business Areas (KIBAs)

- (a) Development in KIBAs will be permitted only for ~~business~~, industrial, storage and waste management uses, including green industries and other compatible industrial and commercial uses (excluding large scale retail) ~~ancillary to, or providing for, the needs of the KIBA, other than where clause (c) below applies.~~
- (b) The intensification of industrial uses in Use Classes B1b, B1c, B2 and B8 and industrial *sui generis* uses is encouraged in KIBAs, in accordance with London Plan policy E7 section A. Development proposals of this type should have regard to operational requirements (including servicing) and mitigate impacts on the transport network where necessary.
- (c) Areas of KIBA land with potential for both intensification and co-location with residential and other uses (in accordance with London Plan policy E7 sections B and D E) are shown on the Policies Map. To be eligible for the Fast Track Route, a 50 per cent affordable housing threshold will apply to proposals of this nature if there is a net loss of industrial floorspace capacity, in accordance with London Plan policy H6.

Supporting text

~~6.28 The London Plan places Lambeth in the 'retain' category for managing industrial floorspace capacity. This means Lambeth should seek to intensify capacity following the principle of no net loss across designated Locally Significant Industrial Sites. KIBAs are Lambeth's Locally Significant Industrial Sites, as defined in the London Plan 2011 and, represent in accordance with London Plan policy E4, are a vital part of the local economy representing the borough's strategic reservoirs supply of land for industry, logistics and services to support London's economic function. This includes light and general industry including emerging industrial-related sectors; storage and logistics/distribution including 'last mile' distribution close to central London, wholesale, consolidation centres and collection points business and waste management uses use; utilities infrastructure; some rail and bus infrastructure; flexible (B1c / B2 / B8) hybrid spaces to accommodate services that support the wider London economy and population; low-cost industrial and related space for micro, small and medium-sized enterprises (including many in the creative, cultural and digital industries and other sectors such as food-making and distribution); and research and development of industrial and related products and processes (Use Class B1b). They KIBAs are listed in Annex 4 and will be are identified on the Local Plan Policies Map. The KIBA approach is supported by the Mayor's SPG on Land for Industry and Transport 2012, which identifies Lambeth as a borough which falls into the category 'restricted transfer of industrial land', where boroughs are~~

~~encouraged to adopt a more restrictive approach to the transfer of industrial uses to other uses. Some changes have been made to the KIBA boundaries in the Core Strategy 2011; in addition, one KIBA has been de-designated and two new ones have been designated. These changes are set out in 'Proposed changes to the Proposals Map – November 2013'.~~

~~6.29 'Business, industrial and storage' uses include all uses in the B use class (B1, B2 and B8). The level of industrial floorspace capacity lost in Lambeth in recent years means that any scope for intensification within KIBAs must be prioritised for industrial floorspace capacity, rather than to allow space for non-industrial uses. Only three KIBAs, or parts of KIBAs, are identified on the Policies Map as having potential for industrial intensification and co-location with other uses, based on particular circumstances affecting those locations. See the KIBA Review 2019 for further information. The approach to industrial intensification and co-location in these locations must follow the approach set out in the London Plan.~~

6.28. KIBAs are Lambeth's Locally Significant Industrial Sites (LSIS) and are listed in Annex 4 and shown on the Policies Map. In accordance with London Plan policy E4, Lambeth's KIBAs are a vital part of the local economy representing the borough's strategic supply of land for industry, logistics and services to support London's economic function and the Central Activities Zone in particular. The London Plan places Lambeth within the Central Services Area (CSA). CSA status requires a particular focus on sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions, to service the functioning of the Central Activities Zone. Waste management and recycling are also particularly important uses in KIBAs given the requirement to meet the London Plan waste apportionment (see Local Plan policy EN7).

6.29. Lambeth undertook a review of its KIBAs to inform the partial review of the Lambeth Local Plan 2015 in the context of the Mayor's evidence on industrial land and capacity in the revised London Plan (Lambeth Review of KIBAs 2019, updated 2020). This study included an analysis of occupancy and development activity in the existing KIBAs in Lambeth and assessed whether any changes were needed to current designations, as well as considering potential for intensification. It also assessed potential for designation of additional land as KIBA. The assessment was carried out in parallel with Lambeth's input to the London Strategic Housing Land Availability Assessment (SHLAA) 2017. It also took account of comments in response to public consultation on the Draft Revised Lambeth Local Plan in 2018, and of the parallel assessment of waste management capacity in the borough

(Waste Evidence Base updated 2020). Overall, the study presents a strong picture, finding very high levels of occupancy and industrial/business related development activity in the majority of existing KIBAs in Lambeth. However, changes to the boundaries of nine existing KIBA are proposed in the study as a result of changing circumstances, as is one full de-designation. Four new KIBAs are proposed but the result is an overall net loss of designated industrial land.

6.29a The level of industrial floor-space capacity lost in Lambeth in recent years, in combination with these boundary changes, means that any scope for intensification within KIBAs must be prioritised for industrial floor-space capacity, rather than to allow space for non-industrial uses. Lambeth does not need to rely on KIBA land to meet and exceed its London Plan housing target. KIBA land must be prioritised instead to meet the requirements of Lambeth's CSA location and the London Plan waste apportionment. Industrial intensification appropriate within the KIBAs includes intensification for light and general industry including emerging industrial-related sectors; storage and logistics/distribution including 'last mile' distribution close to central London, wholesale, consolidation centres and collection points business and waste management uses; utilities infrastructure; some rail and bus infrastructure; flexible (B1c / B2 / B8) hybrid spaces to accommodate services that support the wider London economy and population; low-cost industrial and related space for micro, small and medium-sized enterprises (including many in the creative, cultural and digital industries and other sectors such as food-making and distribution); and research and development of industrial and related products and processes (Use Class B1b). New B2 and B8 uses are particularly encouraged. The approach to industrial intensification should follow that set out in the London Plan and the guidance in the Mayor's Industrial Intensification Primer.

6.29b Given the position explained above, only three KIBAs or parts of KIBAs are identified on the Policies Map as having potential for industrial intensification and co-location with other uses, based on particular circumstances affecting those locations. See the Review of KIBAs for further information. For sites in KIBAs with potential for industrial intensification and co-location, the appropriate amount of industrial floor-space to be re-provided will be assessed as the existing quantum of floor-space and/or actively used yardspace, or 65 per cent plot ratio (defined as total proposed industrial floor-space divided by total proposed site area), whichever is greater for the site in question; unless a site specific policy in the Site Allocations DPD specifies an alternative approach. This is based on the methodology in the Mayor's evidence on London Industrial Land Demand (CAG October 2017).

6.30 Some KIBAs include existing B1a office space, usually in the form of small business units and/or as part of a permission for flexible B1 space. These

business units are important to the Lambeth economy and in some cases are protected by an Article 4 direction removing permitted development rights for change of use from B1a office to C3 residential. However, going forward any potential for intensification within KIBAs should be for industrial uses that meet the definition in London Plan policy E4. Proposals for intensification in KIBAs that affect existing B1a floor-space should therefore ensure that the uplift in floor-space is provided in the form of space that falls within that London Plan definition. Proposals for additional B1a office floor-space in KIBAs will not generally be permitted. Proposals for flexible B1 floor-space, where the intention is to include the option for B1a office space as part of the mix, would not be acceptable in these locations.

6.31 In some cases, uses such as small-scale cafés and gyms intended primarily to serve the needs of those working in and visiting the KIBA, may be considered appropriate. Proposals for café, restaurant or D class uses that would, by virtue of their use, location or configuration, attract significant numbers of customers with no connection to the KIBA will not be permitted.

6.32 The council's approach to waste management uses is set out in Local Plan policy EN7. The approach to land in existing use for transport or support functions is set out in Local Plan policy T4.

6.33 'Green industries' refer to businesses which contribute to achieving a low carbon economy such as environmental goods and services. Examples include recycling; refurbishing and repair; production and distribution of renewable energy technologies; and facilities that enhance the recovery of materials and resources from waste streams (resource recovery or 'upcycling').

~~'Other compatible industrial and commercial uses ancillary to, or providing for, the needs of the KIBA' includes non-B class uses usually associated with industrial areas such as builders' yards, haulage, employment training, bus garages and telecommunications.~~

6.34 Applications for employment-training uses within a KIBA should be accompanied by supporting information setting out the nature of the activity proposed and how it would be ancillary to, or provide for, the needs of the KIBA. Office-based language schools and business colleges are not considered to meet this definition and can attract large numbers of students into industrial areas, potentially jeopardising the future viability of the KIBA. They are more appropriately located in town centres where there is usually a choice of suitable premises and a higher level of public transport accessibility.

6.35 In relation to sections (b and c) of the policy, London Plan policy D13 relating to the Agent of Change principle will also apply.

6.36 ~~In the case of the Southbank House and Newport Street KIBA which falls within the Vauxhall Nine Elms Battersea London Plan Opportunity Area, KIBA policy takes priority over other policies in the plan.~~

Policy EN7 Sustainable waste management

a) In accordance with London Plan policies SI7, SI8 and SI9, the ~~The~~ council will contribute to the sustainable management of waste in Lambeth by:

- i) supporting circular economy principles and the approach to drive driving waste management up the waste hierarchy in accordance with national and regional policy and targets, and in particular the efficient use of resources, the reuse of materials and resources, composting and the recovery of energy from materials;
- New** Contributing to the Mayor's target for London's waste capacity and net self-sufficiency by identifying sufficient capacity and land to meet Lambeth's identified waste needs, including the borough's apportionment target.
- ii) supporting delivery of the Western Riverside Waste Authority's statutory Waste Management Strategy and implementing its own Lambeth Sustainable Waste Management Strategy;
- iii) safeguarding existing waste transfer and management sites for waste management use ~~unless~~ and encouraging the intensification of capacity on existing sites where appropriate. ~~The loss of a waste site for other uses will only be supported where appropriate compensatory provision is made~~ capacity is provided in appropriate locations elsewhere in the borough. Compensatory provision should be at or above the same level of the waste hierarchy of that which is lost and normally meet or exceed the maximum achievable throughput of that the site over the last five years ~~could have achieved~~;
- iv) ~~supporting~~ identifying additional sites/areas for waste management in Key Industrial and Business Areas and other appropriate locations to provide additional capacity to meet, over the plan period, the borough's waste apportionment set out in the London Plan and any other identified waste management needs;
- v) supporting the provision of an adequate supply of land for the operational delivery of the waste collection service, including depots and waste transfer sites;

vi) co-operating with the local waste planning authorities that receive waste from Lambeth to address any issues associated with this during the plan period.

b) Proposals for new and improved waste management facilities will be assessed against the criteria in London Plan policy 5.17 SI8 and national waste planning policy.

c) On-site waste management facilities should be incorporated into all major development proposals unless it is demonstrated that provision is not feasible ~~viable~~ or the location renders the site unsuitable for such facilities. d

~~d) Major development sites should~~ All developments will be expected to recycle construction, excavation and demolition and excavation (CD&E) (GED) waste on-site wherever practicable. For all development, 95 per cent of construction and demolition CED waste should be minimised through reuse and recycling — within London as far as possible reused, recycled or recovered and 95 per cent of excavation waste should be put to beneficial use. Disposal of CD&E-GED waste in landfill should only take place in exceptional circumstances, where it has been demonstrated that alternative, more sustainable fates are not feasible.

Supporting text

9.63 Lambeth has a number of different roles and responsibilities related to waste. Lambeth is responsible for collecting and disposing of household waste, and both of these services are outsourced. Lambeth also arranges for the collection of some business waste in the borough. Lambeth also has a planning responsibility to ensure there is sufficient waste management capacity to meet the borough's identified waste needs. This is achieved through Local Plan policy EN7.

9.64 ~~In line with its London-wide strategy for waste, the London Plan requires every London borough to manage as much as possible of its future waste locally, with the objective of becoming self-sufficient by 2031. Lambeth supports this objective for all waste streams. The London Plan projects that, by 2031, Lambeth will be producing 342,000 tonnes of municipal and commercial/industrial waste every year. It requires Lambeth to manage 313,000 tonnes of this each year within its boundaries by that time. The Mayor's Environment Strategy and London Plan set out ambitious targets for reducing waste, increasing re-use and recycling, reducing waste going to landfill, and supporting the circular economy. Lambeth will promote these objectives by planning to meet its identified waste management needs, working with the Western Riverside Waste Authority (WRWA) and London Waste and Recycling Board (LWARB) to increase household and business~~

reuse and recycling rates, encouraging facilities that operate higher up the waste hierarchy and assessing applications for new development against key circular economy principles.

- 9.65 Lambeth is required to plan for the management needs of waste generated in the borough, contributing towards the target of net self-sufficiency in London by 2026. There are seven waste streams, including household waste, business waste and construction waste. The London Plan apportions an amount of household and business waste that Lambeth needs to manage and the Waste Technical Paper estimates how much waste will be generated from the other waste streams. A summary of the amount of waste Lambeth needs to plan for is set out in the table below.

Identified waste management need (tonnes)

	<u>2021</u>	<u>2026</u>	<u>2031</u>	<u>2036</u>
<u>Apportioned waste (household and business)</u>	<u>143,000</u>	<u>145,000</u>	<u>147,000</u>	<u>150,000</u>
<u>Construction, demolition and excavation waste</u>	<u>78,938</u>	<u>82,244</u>	<u>85,575</u>	<u>88,931</u>
<u>All other waste streams</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

- 9.66 Lambeth is one of four London boroughs (along with Wandsworth, Hammersmith & Fulham and Kensington & Chelsea) for which the Western Riverside Waste Authority (WRWA) is the statutory waste disposal authority for the municipal household waste collected by its constituent councils. A thirty year Waste Management Service Agreement (WMSA) was established between WRWA and Cory Environmental Ltd to dispose of WRWA waste, commencing in October 2002 and ending in 2032. Lambeth's household waste is managed outside of the borough, with recyclables going to a Materials Recovery Facility in Wandsworth and residual ('black bag') waste transported down river to Bexley energy recovery facility. Lambeth will continue to support the delivery of the WRWA's Waste Management Strategy and implement its own Lambeth Sustainable Waste Management Strategy. Lambeth will also work with the WRWA to deliver the Mayor's municipal waste management policies and proposals set out in his Environment Strategy, including the 50% LACW recycling target.

- 9.67 Lambeth has a number of sites currently used for waste management but these do not have the capacity to manage this quantity of waste. Sites currently in waste management or transfer use in the borough are identified in the Waste Evidence Base ~~2019~~ 2013. These existing sites are safeguarded by the policy. Only waste at waste transfer sites sorted for recycling or composting counts towards meeting the borough's apportionment target. The shortfall in capacity equates to around 136,600 tonnes by 2036 ~~2.8 hectares by 2031~~. Lambeth already has a number of waste facilities which can help towards managing its waste and, where appropriate, the intensification of these sites is encouraged. Existing waste sites are safeguarded for waste uses and are identified in Lambeth's Policies Map and the Waste Evidence Base. Redevelopment of safeguarded waste sites for other uses will only be supported if compensatory waste capacity is provided elsewhere within the borough or if waste capacity is re-provided on-site with suitable mitigation measures to ensure any new development does not impact on the ability of the waste operation to function, in line with the agent of change principle. This is to ensure Lambeth is able to continue meeting its waste needs. Once delivery of compensatory waste capacity has been demonstrated to the satisfaction of the council, an existing waste site can be released for other uses. The maximum throughput achieved on the site over the last five years can be identified through the Environment Agency's Waste Data Interrogators. Where this information is not available, for example if a waste site has been vacant for a number of years, the potential capacity of the site should be calculated using an appropriate and evidenced throughput per hectare.
- 9.68 The difference between existing capacity and the amount of waste Lambeth needs to manage is the 'capacity gap'. Further information is set out in the Waste Evidence Base. A summary of the capacity gap (in tonnes) is set out in the table below along with a reasonable assumption of how much land is needed to bridge the gap.

Capacity gap (tonnes) and ~~indicative equivalent~~ land take (hectares)

	<u>2021</u>	<u>2026</u>	<u>2031</u>	<u>2036</u>
<u>Capacity gap for apportioned waste</u>	<u>87,700</u>	<u>89,700</u>	<u>91,700</u>	<u>94,700</u>
<u>Capacity gap for CD&E waste</u>	<u>31,938</u>	<u>35,244</u>	<u>38,575</u>	<u>41,931</u>
<u>Capacity gap for other waste streams</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Total</u>	<u>119,638</u>	<u>124,944</u>	<u>130,275</u>	<u>136,631</u>
<u>Equivalent Indicative land take</u>	<u>2.0ha</u>	<u>2.1ha</u>	<u>2.2ha</u>	<u>2.3ha</u>

- 9.69 The council has undertaken an assessment of locations and sites suitable for additional waste management facilities in the borough. This is set out in the Waste Evidence Base ~~2013~~ 2019. This identifies the borough's designated Key Industrial and Business Areas (KIBAs) as particularly appropriate for new

waste management uses. Waste management and recycling facilities are one of the priority uses for Lambeth's industrial land (see Policy ED3). KIBAs represent Lambeth's main stock of safeguarded industrial land. The benefits of directing new waste facilities towards KIBAs includes co-location with other industrial uses. This helps to reduce the risk of waste facilities being located next to more sensitive development, such as residential. KIBAs have already been assessed for their suitability for industrial uses and are safeguarded for these uses. KIBAs also tend to have access which is wide enough for larger vehicles and are well-connected to main road networks.

- 9.70 Not all types of waste facility are appropriate in Lambeth due to their impact on the dense urban environment. The broad types of facility which are suitable in each KIBA can be found in the Lambeth Waste Evidence Base 2019 locations in which these uses are particularly encouraged. The policy for KIBAs is set out in Local Plan policy ED3 ED4, which makes clear that they are appropriate for green industries including waste management. This includes facilities that may be aimed at moving waste materials up the waste hierarchy (repair and refurbishment workshops resource recovery or 'upcycling'). KIBAs are specifically safeguarded for B class and related sui generis uses and no other uses are allowed in them other compatible industrial uses. Knolly's Yard, Waterworks Road and part of Montford Place KIBAs also have potential for industrial intensification and co-location with residential development. Waste management uses are typically B class or sui generis. The total area of Lambeth's KIBAs (including new KIBAs) is approximately 47 45 hectares of which an estimated 40 hectares is potentially suitable for waste uses. Lambeth needs 2.3ha of land to meet its waste management needs to 2036. Land within the KIBAs is released through business churn and the Lambeth Waste Evidence Base demonstrates that enough land can come forward during the plan period to provide sufficient opportunities to meet this need.
- 9.71 No major waste facilities are expected to come forward in the borough in the period to 2034 2036 but there is scope for a number of smaller facilities to serve the needs of the commercial waste sector. Lambeth would particularly welcome new facilities that contribute towards the circular economy, meeting the Mayor's recycling targets, growth in this type of business in the borough both as a contribution to meeting sustainable waste management objectives and helping to develop and diversify the local economy and create jobs.
- 9.72 Although Lambeth is planning for its own waste, some waste will continue to be exported, for example household waste is exported to Wandsworth and Bexley and excavation waste could be exported to be used for beneficial purposes outside of London. It is expected that a small proportion of waste which cannot be reused, recycled, recovered or put to beneficial use will be

disposed of to landfill outside of London. Lambeth will continue to work with other waste planning authorities on imports and exports of waste through duty to co-operate and monitor any significant changes in patterns of waste movements.

- 9.73 The Western Riverside waste planning authorities work together on cross-boundary waste issues, but do not intend to plan for waste collectively. Lambeth is therefore planning for waste independently but will continue to work with Western Riverside authorities on cross-boundary waste issues.
- 9.74 ~~Lambeth will address the requirement to allocate additional sites and/or areas for waste to meet the London Plan waste apportionment, in a separate Waste DPD, the timetable for which is set out in the council's Local Development Scheme.~~
- 9.75 ~~The London Plan waste apportionments for Lambeth and many other London boroughs have reduced significantly in the Further Alterations to the London Plan (FALP), based on revised projected waste arisings. Lambeth is actively discussing potential to pool waste apportionments with other London boroughs in light of these proposed new apportionment figures, as it is expected that there will be significant surpluses in capacity in some parts of the capital. Lambeth expects that the area of additional land to be allocated for waste in Lambeth will reduce significantly from 2.8 hectares as a result of the new apportionment and these pooling discussions. Given this position, the allocation of additional sites and/or areas to meet any outstanding apportionment in Lambeth may be incorporated into the review of the Lambeth Local Plan rather than a separate Waste DPD. The timetable for the Local Plan early review is set out in the council's Local Development Scheme.~~
- 9.76 ~~In the meantime, Lambeth will monitor and manage the use of the 47 hectares of safeguarded KIBA land to ensure that at least 4 hectares remains available to allow for the allocation of sufficient land for waste in the early review. See performance indicator IND 23a in Annex 8.~~
- 9.77 All proposals for new or improved waste management facilities will be assessed against the criteria in London Plan policy SI8 5.17 (or its successor in any alterations to the London Plan) and in national waste planning policy. These criteria include: protection of water resources, land instability, visual intrusion, nature conservation, historic environment and built heritage, traffic and access, air emissions including dust, odours, vermin and birds, noise and vibration, litter and potential land use conflict.
- 9.78 On-site waste management facilities provide for the management of waste out of the waste stream on the site at which the waste arises. This is distinct from

facilities for on-site storage or collection of waste. Where on-site waste management facilities are not feasible, detailed justification will be required including explanation of the options that were considered and the reasons they were not pursued. Development proposals should be designed to enable future occupiers to segregate and store dry recyclables, food and residual wastes ready for collection to ~~facilitate~~ maximise recycling and recovery. ~~This should include provision for composting where feasible.~~ See also Local Plan policy Q12 Refuse/recycling storage.

9.79 The requirements of sections (c) and (d) of the policy should be addressed in the site waste management plan where this is required; or in a supporting statement that accompanies a planning application. The requirements of the policy will be secured through planning conditions.

9.80 See also Local Plan policy T8 Servicing in relation to delivery and servicing plans; and the London Plan Sustainable Design and Construction ~~sustainable design and construction~~ SPG.

9.81 Monitoring indicators IND24, IND25 and IND26 will report on new waste capacity, loss of waste sites and compensatory capacity, and waste exports. Where monitoring demonstrates that waste management capacity to meet the apportionment target is unlikely to be achieved by 2026, in line with the London Plan net self-sufficiency target, the council will work with the GLA to proactively engage with operators to encourage delivery of additional waste management capacity in the borough.

Table 2 – LB Lambeth response to Transport for London’s comments on the DRLLP PSV dated 13 March 2020

Proposed changes to policy wording arising from the response set out in Table 2 are shown in red within the table.

Item	TfL’s comment	Page	Lambeth response	Proposed change
TfL1	<p>Duty to co-operate</p> <p>We strongly support Lambeth’s commitment to improve rail services in south London through ‘metroisation’. We also welcome the council’s support for improving existing and planned strategic bus corridors and cycle routes to improve orbital and radial journeys. However, we note that council supports the extension of the Tram network to Crystal Palace. TfL is not actively progressing the development of the as it is unlikely to be good value for money. We therefore would suggest the removal of this scheme from the list of transport infrastructure projects.</p>	10	<p>Noted.</p> <p>We acknowledge that TfL is not actively pursuing the extension of the Tram network to Crystal Palace, but this remains an aspiration for the council and has been included at the request of the London Borough of Croydon.</p> <p>Reference amended to reflect a degree of uncertainty.</p>	<p>o the potential to extend <u>extension of the Croydon</u> Tramlink to Crystal Palace and Streatham</p>
TfL2	<p>Transport</p> <p>We note that there is not spare capacity on Thameslink services between London and Herne Hill during peak hours. Text in paragraph 2.40 could be amended to read: ‘During peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria and Blackfriars.’</p>	20	<p>Agreed – reference to Blackfriars added.</p>	<p>However, much of Lambeth’s public transport infrastructure <u>During peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria and Blackfriars</u> (Lambeth Transport Strategy Baseline Report 2017). Investment is needed to improve conditions for passengers, to provide full access to all stations and to enable the planned increases in resident and working population.</p>
TfL3	<p>Transport</p> <p>We appreciate that a number of rail and tube stations in the borough lack step free access. Support for increasing step-</p>	20	<p>Noted, but reference to developer contributions not</p>	<p>No change.</p>

	free access at stations through developer contributions could be mentioned in this paragraph, in particular at key interchanges such as Waterloo where only the London Underground platforms are (partially) step free.		appropriate in this section of the Plan.	
TfL4	<p>Transport</p> <p>We appreciate that a number of rail services in Lambeth are currently at or over capacity as mentioned in paragraph 2.40. A reference to Crossrail 2 could be added here as a key transport investment that would relieve Clapham Junction to Waterloo trains, as well as the Victoria and Northern lines and the Network Rail/London Underground interchange at Vauxhall.</p>	20	Agreed – reference to Crossrail 2 added.	<p><u>However, much of Lambeth’s public transport infrastructure</u> During peak periods rail services in Lambeth <u>are</u> is currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria <u>and Blackfriars</u> (Lambeth Transport Strategy Baseline Report 2017). Investment is needed to improve conditions for passengers, to provide full access to all stations and to enable the planned increases in resident and working population. <u>The implementation of Crossrail 2 and metroisation will be required to meet future demand.</u></p>
TfL5	<p>Planning Obligations</p> <p>We note that Policy D4 includes a long list of potential planning obligations, but does not identify key priorities. As the council are aware, the NPPG was amended last year and now clarifies that formulaic/tariff approaches to planning obligations should be set out in the Local Plan. We note that Lambeth’s revised Local Plan now sets out additional calculations for employment and training, affordable workspace, development resulting in a loss of kerbside space, travel plan monitoring and controlled parking zones in Annex 10 of their Local Plan. However, we are concerned that an increasing number of obligations are subject to formulas, without any indication of priority.</p>	67	Noted – cross reference to London Plan added for clarification.	<p><i>Add the following sentence to paragraph 4.18 of the supporting text to policy D4:</i></p> <p><u>In situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, the priorities set out in London Plan Policy DF1 D will apply.</u></p>

	<p>Policy DF 1(d) in the London Plan states that priority should firstly be applied to affordable housing and necessary public transport improvements before other contributions. We would therefore appreciate it if this could be reflected in Lambeth's Planning Obligations Policy to avoid challenges being made to other planning obligations that are not subject to a formula.</p>			
TfL6	<p>Policy T1 Sustainable Travel</p> <p>We support the policy overall and strongly welcome the reference to the application of London Plan Policy T2 Healthy Streets and Policy T4 assessing and mitigating transport impacts (noting that the addition of the latter appears to have replaced draft Lambeth policy T6).</p> <p>We welcome the intention of Lambeth's road user hierarchy set out in part c. However, we would urge the council to consider some additional nuance around the role of cycling and buses. The two modes need to be considered together to maximise sustainable mode share overall and the benefits each mode offers. There are sections of the road network in Lambeth where buses play a key role in providing transport capacity, as well as greater accessibility, and this needs to be considered alongside expanding access to cycling. In particular, buses play a key role in making London accessible, both in terms of cost of travel and for people who are less able to walk long distances or use stairs and escalators.</p> <p>We also welcome the additional policy requirement for all developments to reduce danger to help meet the Mayor's Vision Zero ambition. Reference to this policy could also be made in Policy T2 Walking and Policy T3 Cycling in either the</p>	191-192	<p>The Plan recognises the importance of buses as the primary mode of public transport in Lambeth, but the needs of buses and cycling need to be considered separately, albeit within the overarching Healthy Streets approach. The Road User Hierarchy reflects both the need to prioritise vulnerable road users and to promote active travel modes.</p> <p>Agreed.</p> <p>Reference to Vision Zero added to T2 and T3.</p>	<p>No change</p> <p>T2 (c) In considering development proposals that are likely to generate an increase in the number of walking trips, Lambeth will seek to secure <u>Development proposals should deliver an</u></p>

	<p>main policy section or supporting text, in addition to referring to Lambeth’s Healthy Route Plan.</p>		<p>improved environment for pedestrians, appropriate to the scale and nature of <u>the proposal each development</u>, with particular regard to <u>their</u> accessibility, safety, convenience and directness of movements, including <u>footway widening</u>, provision of new routes and desire lines, and enhancement of existing routes <u>with reference to the Lambeth Healthy Routes Plan</u>. <u>All development should reduce road danger, to help deliver ‘Vision Zero’ in the borough</u>. Major development proposals should identify key routes and destinations and assess existing and predicted pedestrian flows to, <u>through</u> and from the site. They should provide safe, direct, and attractive routes that accommodate these flows and will be expected to provide improvements that will encourage additional walking trips, <u>including, where appropriate, Legible London signage instead of trips by car</u>. <u>Development proposals should facilitate the improvement of footways to minimum standards where these are not currently met, including through the provision of land for adoption as highway, and enable footway widening where increased footfall is expected</u>. <u>Reductions in footway space should normally be maintained and where possible increased will not be permitted</u>.</p> <p>T3 (h) Development proposals will be expected to <u>enable and contribute towards improvements to cycle access, including the delivery and improvement of local and strategic routes and links, as identified in</u></p>
--	--	--	---

				<p>the Lambeth Healthy Routes Plan <u>All development should reduce road danger, to help deliver ‘Vision Zero’ in the borough.</u> cycle routes, where appropriate, to ensure that new development has exceptional links to cycle routes and key destinations within the borough and beyond. In appropriate locations, developers will be required to contribute land and/or finance towards the delivery of new cycle hire docking locations and other public facilities ancillary to cycling, such as cycle pumps/servicing facilities. A minimum of three years free membership of the Cycle Hire scheme for each dwelling regardless of tenure, should be provided in new residential developments.</p>
TfL7	<p>T3 Cycling Policy T3 (h) could be improved by adding text at the beginning of the policy to read:</p> <p>‘Uptake of cycle hire business accounts should be encouraged for occupiers of commercial developments as part of the travel plan measures.’</p>	201	Agreed – added to end of policy statement.	<p>(h) Development proposals will be expected to <u>enable and contribute towards improvements to cycle access, including the delivery and improvement of local and strategic routes and links, as identified in the Lambeth Healthy Routes Plan</u> cycle routes, where appropriate, to ensure that new development has exceptional links to cycle routes and key destinations within the borough and beyond. In appropriate locations, developers will be required to contribute land and/or finance towards the delivery of new cycle hire docking locations and other public facilities ancillary to cycling, such as cycle pumps/servicing facilities. A minimum of three years free membership of the Cycle Hire scheme for each dwelling regardless of tenure, should be provided in new residential developments. <u>Uptake of cycle hire business accounts should be encouraged for</u></p>

	<p>Policy T3 (e) refers to pool bikes being provided where appropriate. This policy should define what 'pool bikes' are in the policy itself or additional supporting text. These should be provided in addition to the cycle parking requirements for new developments and not in lieu of the minimum parking spaces required.</p>		<p>Agreed. Added to policy and clarified in supporting text</p>	<p><u>occupiers of commercial developments through the travel plan process.</u></p> <p>(e) In considering development proposals that would generate additional trips, Lambeth The council will require the provision of appropriate secure and covered cycle parking facilities in accordance with the minimum standards set out in the London Plan policy T5 and with Local Plan policy Q13 and will expect these standards to be exceeded. When designing building layouts sufficient space should be allocated at the outset to meet these requirements. Development proposals for non-residential employment and education uses will should include provision of showers, changing facilities, drying rooms and lockers for cyclists appropriate to the number of cycle parking spaces provided. Where appropriate, pool bikes should also be provided. <u>, in addition to the cycle parking required to meet the minimum standards.</u></p> <p><u>8.20 Pools bikes are a bank of shared cycles available for use free of charge for a defined period.</u></p>
TfL8	<p>We support policies that will ensure the good quality cycle parking. In that regard, we welcome the requirement for at least 25 per cent of the total cycle parking provision to be of the most accessible type, such as 'Sheffield' stands and, within this, 5 per cent to be designed and clearly designated for larger and adapted cycles in all developments. This will enable a wider range of people to cycle and will enable cycle to be used for a range of different journey purposes.</p>	200, 201	Noted	No change

	<p>Similarly, we welcome Policy T3 (g) which sets the requirements for all developments to have at least one charge point to allow for recharging of electric cycles, with a charge point provided for a minimum of 1 in 10 cycle parking spaces. This policy could be further developed to prioritise/ensure an appropriate mix across stand types, particularly for larger/cargo cycles which may be more likely to require electric assistance.</p>		<p>Agreed</p>	<p>T3 (g) <u>In all developments at least one charge point should be provided to allow for re-charging of electric cycles and a charge point should be provided for a minimum of 1 in 10 cycle parking spaces. Charge points should be accessible to all cycle stand types, particularly those intended to accommodate larger/cargo cycles which may be more likely to require electric assistance.</u></p>
TfL9	<p>We strongly support that Development proposals will be expected to enable and contribute towards improvements to cycle access, including the delivery and improvement of local and strategic routes and links. The council may wish to consider specifying the conditions under which developer contributions will be expected to be made to the cycle networks within Lambeth, for example by defining a catchment around strategic routes as LB Richmond-upon-Thames have done in their recent draft Transport SPD.</p> <p>We also strongly support the requirement for land and/or finance developer contributions towards the delivery of new cycle hire docking locations and other public facilities ancillary to cycling, such as cycle pumps/servicing facilities. A number of developments in Lambeth have also secured free membership for Cycle Hire schemes through S106 agreements. We therefore support the policy requirement for a minimum of three years free membership of the Cycle</p>	200	<p>Noted. The preferred approach to consider each development on a case by case basis, taking into account specific factors e.g. type and volume of trips expected and need to ensure these can be made in a safe, sustainable and inclusive way. We will give consideration to bringing forward further guidance in this area.</p> <p>Noted.</p>	<p>No change.</p>

	<p>Hire scheme for each dwelling regardless of tenure, to be provided in new residential developments.</p> <p>For the sake of clarity, cycle hire caters for a different market/model of cycle usage to personal cycle ownership, and so cycle hire access should be provided in addition to and not in lieu of the minimum cycle parking requirements as set out in Policy T5 in the draft London Plan.</p>		<p>Agreed – add to supporting text.</p>	<p><u>8.19 Contributions of land and/or finance towards delivery of new cycle hire stations will be sought both within and adjacent to the London Cycle Hire Scheme operating area and in areas where the council is promoting complementary cycle hire schemes. Cycle hire caters for a different market/model of cycle usage to personal cycle ownership, and so cycle hire access should be provided in addition to and not in lieu of the minimum cycle parking requirements.</u></p>
TfL10	<p>Supporting text in paragraph 8.18 could be improved by requiring cycle parking provision to be located near active frontages, in addition to being near entrances in prominent locations. Reference could also be made for cycle parking facilities to be made in line with the requirements set out in the London Cycle Design Standards (LCDS), though we do note that this reference is made in Policy Q13 for cycle storage.</p>	201, 202	<p>Agreed – supporting text amended.</p>	<p>8.18 Lambeth will seek the provision of convenient and secure bicycle cycle parking facilities particularly at key locations such as shopping areas, employment areas and transport interchanges, but also throughout residential areas. Staff and residents' cycle parking spaces should be off-street, covered, <u>well-lit</u> and secure. Visitors are usually better provided for by providing parking near entrances <u>and active frontages</u> in prominent, convenient locations. The requirements for cycle storage are set out in design <u>Local Plan</u> policy Q13, <u>and developers should also refer to the London Cycling Design Standards (LCDS)</u>. Residents' cycle parking should normally be within the curtilage of the dwelling or, where this is not possible, in a secure, covered area where only a few (usually a maximum of 10) have access. In appropriate locations, developers will be required to contribute land and/or finance towards the delivery of new cycle</p>

				hire docking stations, where a specific need has been identified by the council in discussion with Transport for London (TfL).
TfL11	<p>Policy T4 Public Transport Infrastructure</p> <p>We support the removal of ‘new stations stops on the London Overground network at Brixton and Loughborough Junction’ from the list of public transport infrastructure, as it has been proved very hard to define a sufficient business case for them.</p> <p>The need to improve rail services in the borough can best be met through TfL’s ‘metroisation’ proposals and we welcome that Lambeth’s Local Plan supports this.</p> <p>As previously mentioned, TfL is not actively progressing the development of the extension of the Tram network to Crystal Palace as it is unlikely to offer good value for money. We therefore would suggest the removal of this scheme from the list of transport infrastructure projects.</p>	203	<p>Noted.</p> <p>Noted.</p> <p>We acknowledge that TfL is not actively pursuing the extension of the Tram network to Crystal Palace, but this remains an aspiration for the council and has been included at the request of the London Borough of Croydon.</p> <p>Reference amended to reflect a degree of uncertainty.</p>	<p>xii) potential extension of the Croydon Tramlink to Crystal Palace and Streatham;</p>
TfL12	<p>We welcome reference to the delivery of Crossrail 2, which will improve public transport capacity in Lambeth despite not directly serving stations in the borough. However, the supporting text in paragraph 8.25 could be improved to accentuate the benefit that Crossrail 2 will bring to the</p>	205	<p>Noted.</p> <p>We acknowledge that Crossrail 2 will provide a significant benefit to Lambeth.</p>	<p><u>8.25</u> <u>Although there are no planned stations in the borough, Crossrail 2 will have a significant beneficial impact on public transport capacity in Lambeth, by relieving rail services between</u></p>

	<p>borough, such as by freeing up significant capacity into Waterloo.</p> <p>Text could be amended to read: ‘Although there are no planned stations in the borough, Crossrail 2 will have a beneficial transformational impact on public transport capacity in Lambeth...’</p>		Supporting text amended.	<p><u>Clapham Junction, Vauxhall and Waterloo, interchange with underground services at Vauxhall, the Jubilee line at Waterloo and the Victoria and Northern lines through the borough.</u></p>
TfL13	<p>Policy T7 Parking</p> <p>We would welcome some clarity on the requirement to ‘avoid reliance on the public highway for parking needs’. As neither the London Plan nor the Lambeth Local Plan set minimum standards, we are not sure what parking ‘need’ is being referred to, if the policy is regarding general (i.e. not disabled persons) parking.</p> <p>However, in the case of residential disabled persons parking, there may be instances where, for example, identifying on-street spaces that could potentially be converted if demand were to arise, could make a better use of safeguarding limited space on constrained sites for this possible demand. We would encourage a more flexible approach if this is the current intention, within the council’s (welcomed) intention to manage demand for parking and allow more efficient use of kerbside. We believe it is reasonable to extend this</p>	211	<p>Agreed.</p> <p>Reference changed to requirement, rather than need.</p> <p>Noted. The preferred approach is to consider each site on a case by case basis, taking into account specific factors including highway capacity.</p> <p>Supporting text amended to clarify that minimum requirements at the outset</p>	<p>(d) (iii)</p> <p>avoid reliance on the public highway for parking needs, to meet the parking requirements of development, including in relation to parking for people with disabilities, motorcycle and coach parking. <u>Where evidence is presented that it is not possible to accommodate parking requirements within the site the council will seek planning obligations in the form of a commuted sum, considering both the cost of implementation and maintenance of any parking bay and infrastructure for electric or other Ultra-Low Emission vehicles, as well as the opportunity cost of lost kerbside space, for example in terms of parking revenues. The approach to calculating commuted sums is set out in Annex 10.</u></p> <p>8.36 <u>Non-residential parking for people with disabilities should be provided in line with London Plan standards, which require at least one bay, and state that ‘adequate provision’ should be made for people with disabilities. The appropriate level of parking for people with disabilities will depend on local factors including the nature of the development, site constraints, and existing</u></p>

	<p>approach to prioritising disabled persons parking over general parking.</p> <p>We appreciate the challenge of managing on-street parking stress, and welcome the council’s recognition that this necessitates adequate parking controls. If there are areas of particularly high stress that make accommodating growth more difficult, the council may wish to consider the example of Brighton and Hove council, who have capped the total number of permits issued in central CPZs, operating a waiting list for new residents. Lowering such a cap over time could also enable the council’s aim of allocating more space to efficient uses without requiring any individual to give up their existing access to on-street parking.</p>		<p>should, wherever possible, be met within the site, but that a more flexible approach can be taken to meeting future demand. Lambeth will to discuss approaches to implementation with TfL as appropriate on a case by case basis.</p> <p>Noted.</p> <p>This is not considered to be a matter for the Local Plan and will be addressed through other policies.</p>	<p><u>provision. The availability of step-free access to public transport is also a relevant consideration, and where appropriate the developer will be expected to facilitate improvements to this.</u></p> <p><u>Wherever possible, the minimum initial requirement for parking for people with disabilities should be provided on-site in order to ensure convenient access and effective allocation of spaces to users of the development. A more flexible approach may be considered in meeting future demand over and above the initial requirement, subject to highway constraints.</u></p> <p>No change.</p>
TfL14	<p>We note the council’s stated support for car clubs. Car clubs may have a role to play in supporting growth, particularly where they can help support parking provision below that set out in maximum standards. However, it is also important that car clubs are a genuine replacement for private ownership, and not creating new car trips in addition to</p>	211-212	<p>We acknowledge the need to link car club policy to wider management of parking and this will be addressed by the council’s forthcoming Kerbside Strategy, rather than in the</p>	<p>8.39 ‘Car clubs’ and ‘pool car schemes’ are shared pools of cars available locally for short term hire and are a <u>convenient</u> cheap alternative to car ownership. They allow for occasional car use but discourage unnecessary car journeys. There is now good coverage across Lambeth of car club bays and</p>

	<p>those being made by people who already own their own vehicle. We would welcome a clearer link being established between the introduction of car clubs and measures to discourage or limit private ownership, such as the reallocation of on-street parking spaces or restricting the creation of new parking permits. In the context of new residential development specifically, as PTAL 4-6 should be car-free, we only support the introduction of new car club spaces in lieu of private parking in areas of PTAL 3 or lower within the borough.</p>	<p>Local Plan. The Kerbside Strategy forms part of the Transport Strategy Implementation Plan which is referenced in the Local Plan.</p> <p>The preferred approach is to consider each site on a case by case basis, taking into account specific factors including highway capacity and the local travel context. We consider that the need for occasional car use is not restricted solely to low PTAL areas.</p> <p>Supporting text amended to reflect the particular needs of low PTAL area.</p>	<p>the council is aiming for a car club bay within 400m of each other to ensure convenient provision for all Lambeth residents. Car club spaces will be required where appropriate, preferably <u>with public access on-street</u> to allow <u>general public use</u>. <u>The provision of car clubs is particularly relevant in areas less well served by public transport</u>. <u>All car club spaces, including on-street bays, should be supplied with an electric vehicle charging point to allow zero emissions vehicles to operate from the bay</u>. Provision of car club membership will be required for all residents from first occupation of a development scheme. Car clubs and pool car schemes will also be promoted as an alternative to car parking and individual car ownership in employment areas for use by businesses and workers. Planning obligations will be used to secure such contributions.</p>
TfL15	<p>We support the principle of permit-free development as established by the policy, although there appears to be a potential inconsistency in the current policy wording. The policy appears to require permit-free where ‘the development falls within an existing or planned controlled parking zone’ (or the development involves the redevelopment of existing dwellings). However, paragraph 8.37 defines car-free development as both not providing on-site parking and being permit-free, and the policy applies the draft London Plan requirement for car-free at PTAL 4-6. We support this definition and would suggest that permit-free is required for all car-free residential development, with CPZs expanded as necessary to support this (in line with the</p>	<p>211</p> <p>Agreed.</p> <p>Amend policy to state that all PTAL 4-6 should be permit free.</p> <p>Broader CPZ policy will be addressed by the council’s forthcoming Kerbside Strategy, rather than in the Local Plan. The Kerbside Strategy forms part of the Transport Strategy Implementation Plan which is referenced in the Local Plan.</p>	<p>(d) (ii) <u>be permit free where the development has a PTAL of 4-6 and/or where the development falls within an existing or planned controlled parking zone.</u></p>

	borough's plans to consult on new CPZs and review existing CPZs).			
TfL16	<p>Supporting text in paragraph 8.35 could be clarified by specifying where car-free development will be expected and reduce the scope for subjective inconsistency. Text could be amended to read:</p> <p>'Lambeth will expect car-free development in most areas, with no general parking at all in well-connected areas with excellent, very good or good public transport accessibility (including those of PTAL 4,5 and 6) and limited parking elsewhere.'</p> <p>Please also note that PTAL refers to 'Public Transport Accessibility Levels', to distinguish it from physical/step-free accessibility.</p>	213	<p>Agreed.</p> <p>Add reference to PTAL in supporting text.</p>	<p>8.35</p> <p>Lambeth will expect car-free development in <u>most areas, with no general parking at all in areas with excellent, very good or good public transport accessibility (PTAL 4,5 and 6) and limited aim to maximise parking elsewhere.</u> <u>Lambeth's standards in areas with lower access to public transport reflect already low levels of car ownership in such areas, as well as projected modal shift to sustainable modes and the need to accommodate growth while decreasing car usage.</u> Refer to '<u>Lambeth Car Parking Standards Supplementary Information</u>' paper for more details. Public transport accessibility is assessed using Transport for London's Public Transport Accessibility Levels (PTAL), <u>which measures access to public transport.</u></p>
TfL17	<p>Policy T8 servicing</p> <p>Text in Policy T8 (f) could be amended to read:</p> <p>'Developers and their contractors will be expected to adhere to the Construction Logistics and Community Safety (CLOCS) standard, and be registered through the Fleet Operator Recognition Scheme) (FORS) or equivalent'</p>	216	<p>Agreed.</p> <p>Reference to FORS added.</p>	<p>(f) Developers and their contractors will be <u>expected to adhere to the Construction Logistics and Community Safety (CLOCS) standard and be registered through the Fleet Operator Recognition Scheme (FORS) or equivalent.</u> <u>They will be and</u> required to demonstrate in a construction logistics plan that they have considered the impacts of other construction activities in the vicinity of the site and where appropriate have co-ordinated construction activities with the developers and/or contractors of adjoining sites.</p>
TfL18	We strongly support the application of London Plan Policy T7 to promote sustainable freight and servicing. We also	217	Agreed.	(i)

	<p>support measures to reduce negative impacts of freight and servicing vehicles, such as the promotion of off-peak deliveries, consolidation and distribution facilities, zero emission vehicles and active freight for last mile deliveries. However, text in Policy T9(i) could be improved to emphasise the use of active non-vehicular modes to read:</p> <p>‘Zero emission vehicles should be used for servicing wherever possible and consolidated deliveries are expected to be of this type. Servicing by cycle and other non-vehicular modes should be used wherever possible. Any on-street loading bay required for a development should be supplied with an electric vehicle rapid charge point to allow zero emissions vehicles to operate from the bay.’</p>		Reference to active non-motor vehicular modes added.	<p><u>Zero emissions vehicles should be used for servicing wherever possible and consolidated deliveries are expected to be of this type. Servicing by cycle and other non-motor vehicular modes should be used wherever possible. Any on-street loading bay required for a development should be supplied with an electric vehicle rapid charge point to allow zero emissions vehicles to operate from the bay.</u></p>
TfL19	<p>Supporting text in paragraph 8.46 could be improved by referring to the Direct Vision Standards (DVS). We understand that one star is the minimum from October 2020, but there is an opportunity to go further and require a DVS minimum of 2 stars for all new developments in Lambeth, reflecting the council’s commitment to reducing road danger within the borough.</p>	218	<p>Agreed</p> <p>Reference to DVS added.</p>	<p>8.46 Cycle safety measures should be included in construction logistics plans for new developments, particularly to provide safe routes for cyclists during the construction period. <u>Construction vehicles should meet or exceed minimum Direct Vision Standards, and construction vehicles should be being fitted with cycle safety equipment, including side bars, blind spot mirrors and detection equipment to reduce the risk of collisions on the borough’s roads. See also policy Q12 in relation to refuse/recycling storage.</u></p>
TfL20	<p>Policy T9 Minicabs, taxis, private hire vehicle and ride hail services</p> <p>It should be noted that minicabs, taxis and private hire vehicles are not considered to be sustainable travel modes, as the council have reflected in their modal hierarchy. However, while Policy T9 is caveated, the tone could be read</p>	219	<p>Noted</p> <p>The current wording reflects the consistent style and</p>	<p>8.47 Minicabs, taxis and private hire vehicles are part of the transport system and aid the overall aim of seeking a lesser dependence on car ownership. <u>While not considered to be sustainable travel modes,</u> tThey provide an important service for people with mobility difficulties and should be</p>

	<p>as promoting these modes in their own right alongside public transport and active travel. Text in Policy T9 (a) could be amended to adopt a more balanced tone, such as the following:</p> <p>‘Proposals for minicab and private hire vehicle offices and taxi ranks will be supported considered where appropriate in town centres and other areas where they will meet a demonstrable transport need and where they demonstrate through a transport assessment that their operation would not adversely impact on traffic congestion, local parking supply, capacity or need, pedestrian movement or road safety.’</p> <p>It should also be noted that minicabs, taxis and PHVs are not included in the Mayor’s aim for 80 per cent of trips to be made by sustainable modes so any increase in their use will potentially undermine the achievement of the London-wide aim, but also Lambeth’s local aim.</p>		<p>approach of development plan text.</p> <p>It is acknowledged, that this mode should have a lesser priority when compared to sustainable modes and this is reflected in the council’s road user hierarchy. To further reflect this, supporting text has been amended.</p>	<p>part of ensuring safe transport options are available late at night. Interchange between public transport and taxis and minicabs is important; however, proposals for such facilities must not compromise safety, traffic congestion and residential amenity. Designated taxi ranks should be part of the transport network in town centres and other locations where there is a busy late night economy. Provision should be made in major schemes and within taxi ranks to set down passengers and for pre-booked pickups by private hire vehicles (PHV).</p>
TfL21	<p>Policy Q13 Cycle Storage</p> <p>We note that Policy Q13 b i) states that a reduction in unit numbers may be sought at small-scale flat conversions to accommodate suitable cycle storage provision, while part v) states the council will consider ‘loss’ of converting an on-street car parking bay where there is no viable alternative. However, it is not clear whether reducing unit numbers is a ‘viable alternative’ or whether this unit numbers may only be reduced after it has been demonstrated that cycle parking cannot be accommodated on-street. We would support the latter, as to do otherwise would prioritise maintaining parking over delivering additional new homes. There may also be scope to cater for existing residents without access to safe and convenient cycle parking in the vicinity when on-street cycle parking hangars are delivered. Furthermore, a</p>	284	<p>Noted.</p> <p>Policy amended to remove reference to viability. This policy is intended to cover small sites where it is not physically possible to provide on-site parking. We do not wish to construct a policy that allows larger developments to avoid providing cycle parking on-site.</p>	<p>b) v) consider the <u>removal</u> loss of an on-street parking bay in favour of an on-road cycle store to be shared between residents where it can be show <u>shown</u> that there is no other <u>practical</u> viable alternative <u>due to site constraints</u>. <u>The cost, including the opportunity cost of kerbside space, is to be borne by the development.</u></p>

	<p>reduction in on-street parking reduces vehicle dominance and is a significant part of delivering Healthy Streets that are more people focused (as opposed to being vehicle focused).</p> <p>Policy Q13 b(iv) sets out the circumstances in which the council will support cycle parking within a flat. However, it is not clear to what extent this approach is preferred to the others identified in the policy. The policy should also specify that any such storage space should be large enough to accommodate a full-sized bicycle.</p> <p>We strongly support Policy Q13 b(v) which states that developers should consider the loss of on –street parking bays to provide on-road cycle stores. We also strongly support Policy Q13 (c) which states that cycle storage needs to be being fully compliant with minimum standards set out in the London Plan and exceed these where a high demand for cycling is expected. However, we would also request that this policy refers to the LCDS, in addition to this policy.</p>		<p>Noted</p> <p>There is no preference between options iii) and iv). Both are considered suitable options for this type of development.</p> <p>Agreed.</p> <p>Reference to LCDS added to a).</p> <p>Minor amendment to c) for clarity.</p>	<p>No change.</p> <p>a) <u>Vii) Be fully compliant with the London Cycling Design Standards.</u></p> <p><u>c) All cycle storage should beBe fully compliant with the minimum standards set out in the London Plan and exceed these where a high demand for cycling is expected. When considering proposals for commercial development, appropriate levels of visitor cycle parking will be expected.</u></p>
TfL22	<p>Waterloo and South Bank – Transport and Public realm</p> <p>Policy PN1 is broadly in line with discussions that the council have had with TfL over a number of years, with development in this area contributing to greener, active and more sustainable travel.</p> <p>However, paragraph 11.12 states that ‘Waterloo is forecast to see an overall increase in car trips due to projected growth in the area.’ In practice, development in this area should be car-free and we do not expect it to have a</p>	334	<p>Agreed.</p> <p>Reference to vehicle trips added.</p>	<p>11.11 <u>The area has important road, cycling and walking connections across the river into Westminster, along the river westwards towards Vauxhall and Nine Elms and eastwards to Bankside and London Bridge. Although car ownership is relatively low, Waterloo is forecast to see an overall increase in car trips motor vehicle trips due to projected growth in the area. Measures are therefore required to address this, including traffic management measures to reduce traffic and</u></p>

	significant impact on traffic levels in this area. However, if this text is retained, 'car trips' should be changed to 'vehicle trips' to more accurately reflect the likely growth in servicing, taxi and PHV movements rather than car movements.			<u>increase walking and cycling, working towards the objective of 'car free Waterloo'.</u>
TfL23	Site 5 – Elizabeth House, York Road, SE1 A requirement for this site to provide step-free access to the Bakerloo (northbound) and Northern line platforms should be included. A new bullet point under Design Principles and Key development considerations should therefore be added to read: 'Facilitates step-free access improvements to Waterloo station'	345	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No change.
TfL24	Site 9 – ITV Centre and Gabriel's Wharf, Upper Ground SE1 Reference to the Garden Bridge should be removed in part (viii) in the Design principles and key development considerations section, as this scheme is no longer going ahead.	356	Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the forthcoming Site Allocations DPD.	No change.
TfL25	Vauxhall Please amend the opening date for the Northern line extension from 2020 to Autumn 2021 in Paragraph 11.18 and 11.31.	357 / 360 / 365	Agreed.	11.18 <u>a transformational step-change in public transport provision including the Northern Line Extension from Kennington to Battersea Power Station with a Lambeth station at Nine Elms to be open in Autumn 2021by 2020, supported by a comprehensive package of rail, bus, cycling, pedestrian and highway improvements around the Vauxhall transport interchange expected to be delivered by 2022;</u>

	<p>We would urge some caution with regards to the reference in Policy PN2 (i) to investigate whether the one-way system at Kennington Lane/Durham Street/Harleyford Road can be replaced with a two-way system, and to promote walking, cycling and public realm improvements on Albert Embankment and along the viaduct linking Vauxhall to Waterloo as part of the Low Line project. An option of changing the Durham St triangle to a two-way system was previously looked at as part of ongoing works at Vauxhall Cross, but was not well received during local consultation. If further work was to be carried out on this option, we would want to prevent any negative impacts on the design of the Vauxhall Cross scheme.</p>		<p>Noted.</p>	<p><u>11.31</u> <u>.... These initiatives, along with the opening of the Northern Line extension in Autumn 2021 2020, will help unlock a range of opportunities for the borough's residents and businesses that would not otherwise come forward.</u></p> <p><u>11.119</u> <u>.... In Autumn 2021 2020 the Northern Line extension spur from Kennington will open and will give direct access to the emerging CAZ retail cluster at Battersea....</u></p> <p>No change.</p>
TfL26	<p>Site 13: Vauxhall Island Site The boundary of Vauxhall Island Site is incorrect in the map for Site 13 as it includes the bus station area. This should be corrected to depict the correct site area as this might raise</p>	376	<p>Site allocations are not being amended as part of the Local Plan Review. These comments will be considered as part of the</p>	<p>No change.</p>

	issues that were previously addressed about the links between the bus station and developer.		forthcoming Site Allocations DPD.	
TfL27	<p>Brixton</p> <p>Policy PN3 (o) references that the council would like to improve connections between Brixton’s mainline and London Underground stations. We would welcome hearing more from the council to understand how these aspirations will be achieved, taking into account how increased demand may impact station and Victoria line capacity.</p> <p>Policy PN3 (p) states the council’s aspirations to reopen the rear entrance to Brixton London Underground station. However, we are not sure what entrance Lambeth are referring to. We would welcome clarity on this point and further discussion if the council wish to retain this aspiration.</p> <p>Numerous references are also made to a potential cycle lane between Atlantic Road and Electric Lane but this scheme has made limited progress to date and we would encourage the council to further engage with us on to discuss this scheme and its proposed location in more detail.</p> <p>Policy PN3 (r) references the delivery of the Streatham to Oval cycle way through the town centre. While we welcome</p>	390	<p>Noted.</p> <p>Noted. The entrance referred to is from Electric Lane. The Council would welcome further discussion with TfL about how this aspiration can be achieved.</p> <p>Noted. This is assumed to refer to the cycle hub proposals. The provision of additional and improved cycling infrastructure in the town centre remains a key objective for the council, in line with the opportunities created by the Brixton Liveable Neighbourhoods project. We welcome the opportunity for further discussions about how a cycle hub could be delivered in Brixton in line with PN3.</p> <p>Noted.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>(r) <u>Brixton Road – Brixton’s ‘high street’ has seen significant highway improvements: further</u></p>

	<p>the aspiration, as the council are aware, this is a large, complex scheme and is subject to approvals, so it may be beneficial to nuance the text here.</p> <p>The map for Site 16 should also position Brixton Underground Station on the south side of Atlantic Rd, closer to the A23.</p>		<p>This is the case with all major projects. Text amended.</p> <p>See above regarding site allocations.</p>	<p><u>expected</u> improvements include the delivery of the <u>Streatham to Oval cycle way through the town centre including safety improvements to key junctions, traffic management and air quality improvement measures, improved connections to surrounding areas;...</u></p> <p>No change.</p>
	<p>Stockwell</p> <p>Policy PN6(e) mentions introducing measures that will reduce the severance caused by Clapham Road in the area. We are keen to work with the council more widely to reduce road severance and to identify proposals in this area that can achieve this.</p>	423	Noted	No change.
TfL28	<p>West Norwood / Tulse Hill</p> <p>Policy PN7 (c) suggests that delivering two-way working will reduce traffic dominance caused by Tulse Hill gyratory. We are aware that this particular option is an aspiration of the borough, however we believe that other options to improve safety, cycling, walking and buses should also be considered, and we would like to work with the council to identify the most feasible and effective option. We therefore suggest that this policy focuses on the wider benefits that the scheme is aiming to deliver, rather than referring to 'two-way working' specifically.</p>	430	<p>Agreed.</p> <p>Policy amended.</p>	<p><u>(c)</u> <u>The council will work with stakeholders to promote improvements to public transport services to the area, including accessibility improvements to the rail stations and the wider objective to improve the reliability and frequency of rail services across the area. The council will work with TfL to reduce traffic dominance caused by Tulse Hill gyratory, including through the potential re-introduction of seeking to introduce two-way working, creating better, safer connections for walking and cycling and an improved environment.</u></p>
TfL29	<p>Kennington / Oval</p> <p>Please amend the opening date for the Northern line extension from 2020 to Autumn 2021 in Paragraph 11.19.</p>	437	Agreed.	<p><u>11.119</u> <u>.... In Autumn 2021 2020 the Northern Line extension spur from Kennington will open and will</u></p>

	<p>The Kennington/Oval section mentions that Lambeth will support TfL with the delivery of planned routes on the A23 linking to Brixton and the A202 linking to Camberwell as part of the potential alignment of CFR14. However, this scheme has yet to be confirmed, therefore the wording should reflect that these routes are supported, albeit 'potential'.</p>		<p>Noted.</p> <p>This is the case with all major projects. Text amended.</p>	<p>give direct access to the emerging CAZ retail cluster at Battersea....</p> <p>PN8 i) <u>implementing the council's Healthy Route Network in the area, including improvements to Cycleway 7 on the A3 corridor, Cycleway 5 on quieter streets and the direct link to Waterloo via Kennington Lane. The council will support TfL in the delivery of expected <u>planned</u> routes on the A23 linking to Brixton and the A202 linking Camberwell.</u></p>
	<p>Loughborough Junction – Transport and Public Realm We support the aspiration to improve walking and cycling links in the area and to improve the accessibility of this area. Text could be added at the end of paragraph 11.143 to read: 'Expansion of London Cycle Hire will be explored with TfL, to be funded by new developments in the form of developer contributions.'</p> <p>However, we urge greater caution around the promotion of the use of car clubs in this area (which is PTAL 5) unless they are more directly linked to measures that discourage private ownership, for example an overall reduction of on-street spaces alongside the introduction of a (smaller) number of car club spaces and permit restrictions for new residents.</p>	<p>448</p>	<p>This reference can be added to 11.143, but using "to be funded <i>through</i> developer contributions" (emphasis added) because funding may come from existing developer contributions (e.g. CIL) rather than just from new developments.</p> <p>Noted. See reference to car club policy above.</p>	<p>11.143 <u>Loughborough Junction has one of the lowest levels of car ownership in the country. Many residents walk and cycle to get around the area and use public transport to access other areas. The council's Healthy Route Network responds to this and identifies the need for improved walking and cycling links to adjacent areas. There is also an aspiration to open up additional routes through and around the railway viaducts to improve the permeability and accessibility of the area as part of an extension to the Low Line project. Expansion of London Cycle Hire will be explored with TfL, to be funded through developer contributions.</u></p> <p>No change.</p>

TfL30	<p>PN11 Upper Norwood / Crystal Palace</p> <p>As previously mentioned, TfL is not actively progressing the Tram extension to Upper Norwood/Crystal Palace as it is unlikely to be good value for money. Reference to a Tram extension should therefore be removed from the policy text and scheme map, as this scheme is unlikely to be developed.</p>	460	<p>Noted.</p> <p>We acknowledge that TfL is not actively pursuing the extension of the Tram network to Crystal Palace, but this remains an aspiration for the council and has been included at the request of the London Borough of Croydon.</p> <p>Reference amended to reflect a degree of uncertainty.</p>	<p>b) supporting the <u>potential</u> extension of the Tramlink to Crystal Palace and/or improvements to rail frequencies on the Beckenham Junction corridor to provide improved access for the area; Gipsy Hill station is only fully accessible to one platform and development should seek to enable step-free access to both platforms;</p>
-------	--	-----	---	---