



Date: 14/10/20

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Dear Sir / Madam,

RE: LB Lambeth Local Plan Examination

Thank you for providing the opportunity to comment on the LB Lambeth Local Plan Examination.

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

Matter 3 – Housing

Question 3.1 (i)

Does the Plan address the Government's prioritisation of the delivery of new homes, as expressed in paragraph 59 of the Framework, or is the Plan cautious in its housing delivery?

TfL CD generally consider that the Lambeth Local Plan addresses the Government's prioritisation of the delivery of new homes, as expressed in paragraph 59 of the National Planning Policy Framework.

Question 3.1 (iii) and (v)

v) In terms of housing provision and site allocations, what is the relationship between this



Plan and the Site Allocations Plan which the Council intends to prepare in the near future?

TfL CD support the development of a Site Allocations Development Plan Document to provide detailed policy for key sites, based on a design-led assessment of capacity and to include additional suitable sites. As a landholder of a number of sites within the borough which have the potential for significant residential-led development, we welcome the opportunity to work with the borough to ensure the site allocations accurately reflect the sites capacity and align with our development aspirations, ultimately to increase planning certainty and accelerate delivery across the borough.

Question 3.2 (i)

Is policy H2 (delivering affordable housing) justified and effective?

TfL CD are committed to the delivery of 50% affordable housing across its development portfolio throughout London in line with the London Plan.

Question 3.10

Is policy H12 too onerous in relation to London Plan policy H11?

Yes. This view is supported by our previous representations. The Intend to Publish London Plan formally establishes that the BTR sector has distinct economics to the build-for-sale sector and, that in order for BTR development to be viable and deliverable, affordable housing planning policies should be applied differently. This is firmly in line with the NPPF and PPG, and is the principal matter dealt with in Intend to Publish London Plan Policy H11.

The Intend to Publish London Plan makes clear that Discounted Market Rent (DMR) is an intermediate product and Lambeth should note the Mayor's preference that DMR be set at London Living Rent levels as set out in Intend to Publish London Plan Policy H11A. The requirement to provide a 70% proportion of affordable housing as low-cost rent and deliver it in a separate building is not supported by evidence which clearly demonstrates that this approach is viable and is one which would enable the delivery of good quality Build to Rent housing schemes from coming forward over the



plan period.

While this issue has not been raised by the Mayor as one of non-conformity with Intend to Publish London Plan Policy H11, the proposed approach is one which creates such a burden as to dissuade any prospective Build to Rent providers from delivering good quality housing in the borough. The significant benefits to Lambeth residents of BTR development that would otherwise be realised will be lost. This will include reducing the likelihood of the Borough achieving the minimum housing targets set by the draft London Plan.

Concluding Remarks

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

Yours faithfully,

Chris Ridout

Assistant Planner, Transport for London Commercial Development