



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 4 – Economic Development, Retail and Town Centre Uses**

**Question 4.3 (i)**

*Is policy ED2, which seeks to promote affordable workspaces, sufficiently responsive to sensitive viability considerations, or are there soundness issues with its application, for example in relation to applications for redevelopment and refurbishment of office space?*

TfL CD have previously raised concerns regarding the cumulative viability impact that is likely to occur when mixed-use schemes are required to deliver affordable workspace in addition to other requirements such as affordable housing and community infrastructure levy. Many of TfL's schemes already have high infrastructure costs associated with safeguarding our operational requirements and so additional costs are likely to significantly impact on what can be delivered.



## Question 4.8 (ii)

*What is the justification for the limit of 100 rooms within parts of Vauxhall which lie outside the Opportunity Area?*

TfL CD consider the 100-room limit to be overly restrictive and would encourage Lambeth Council to increase the room limit to 150 rooms. Whilst Lambeth Council would retain the ability to resist larger operations if they are not satisfied with their amenity impact or the impact upon the surrounding land use mix, if managed effectively through measures such as operational management and servicing management plans, a 150-room hotel may be wholly appropriate.

## Question 4.9

*Policy E15 seeks to maximise local employment opportunities through a number of measures, including a requirement for a minimum of 25% of all jobs created by a development proposal (in both the construction phase and for the first two years of end-use occupation of the development) to be secured for local residents. Is this policy justified, is it in accord with the London Plan and national policy and is it enforceable, i.e. effective?*

The Council responded in their consultation statement May 2020 to concerns raised at the Regulation 19 stage that this policy was considered too onerous. The Council noted that this “approach has already worked effectively in a number of approved developments” but it is hard to understand the significance of this as a justification as a number of developments could be 2 developments which may not be that representative. In the TfL CD Regulation 19 Local Plan representations we also queried where this 25% requirement had come from but there was no response to this query. Given the points raised in the TfL CD Regulation 19 comments we still consider this policy does not accord with paragraph 16 of the National Planning Policy Framework which states that plans should “*be prepared positively, in a way that is aspirational but deliverable*”.

## 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**