

## **Matter 6 – Transport and communications**

### **6.1 Strategic transport:**

*(i) Does policy T4 (public transport infrastructure) accord with national policy?*

Policy T4 accords with NPPF Chapter 9 Promoting sustainable transport:

- In accordance with NPPF para 103, policies Policy H1 (iii) and ED1 (a) seek to focus significant development in areas of good public transport accessibility.
- As required by the NPPF para 104, Policy T4 (a) identifies public transport projects which would widen transport choice and enable further development, while Policies T2 and T3 seek to enhance walking and cycling networks and supporting facilities such as cycle parking.
- As required by the NPPF paras 105 and 106, Policies T7 (a) and (b) set out maximum parking standards, which take into account the public transport accessibility levels and local car ownership levels (see Topic Paper 6 Parking Standards ([TP06](#))). The proposed parking standards are supported by TfL (see the statement of common ground with the Mayor, [SCG01](#)).
- NPPF para 108 is reflected in Policy T4 (d), which requires development proposals to mitigate for any significant impacts arising from the development on the public transport network, through contributions towards the provision of new and/or improved infrastructure. Policy T4 (e) requires developers to facilitate access to public transport, through improvements to walking and cycling links to public transport nodes.
- NPPF para 110 is reflected in the hierarchy of movement outlined in Policy T1 (c), which prioritises pedestrian and cycle movements. Policies T2, T7 and T8 also mirror NPPF para 110 by ensuring development delivers safe, direct, and attractive walking routes, parking provision for the disabled, and suitable servicing strategies.
- In line with NPPF para 111, paragraph 8.4 in the Plan states that, in accordance with Policy T4 of the [London Plan](#) ([SD03](#)), development proposals should submit a transport statement or transport assessment, and a travel plan.

Policy T4 also accords with the London Plan by referring to and reflecting London Plan Policy T3 Transport capacity, connectivity and safeguarding.

To address comments made by Transport for London (representation [R048](#)), the Council is proposing a potential change to Policy T4 (a) (xii) to be consistent with the London Plan regarding the potential extension of the Croydon Tramlink to Crystal Palace ([SD17a](#) - PC055). This has been agreed by TfL ([SCG01](#) – see Table 2, p34).

*(ii) Does the evidence point to the public transport modes in Lambeth having sufficient capacity to accommodate peak hour flows if the proposed development comes to fruition during the plan period?*

Improvements to strategic transport provision are required to meet expected future demand on the network. The key improvements that are needed and the key actions required to achieve them are outlined in Lambeth's Transport Strategy ([EB43](#) - Outcomes and Actions Plan, p14-29), and additional detail is included in the Transport Strategy Implementation Plan, or TSIP ([EB43a](#)).

The Plan supports the aims of Lambeth's Transport Strategy with regard to public transport capacity. Supporting text paragraphs 2.37 and 2.40 highlight that many rail and underground services currently operate at or over capacity in Lambeth, and Policy T4 (a) lists where capacity improvements are most needed. The Council is also proposing a change to address comments made by Transport for London ([R048](#)) regarding the need for the implementation of Crossrail 2 and 'metroisation' to meet future demand ([SD17a](#), PC008, and [SCG01](#) – see Table 2).

Policy within the Plan refers to the need for developers to contribute towards the provision of new additional public transport capacity proportionate to the projected number of additional trips arising from the development (Policy T4 (d), and supporting text paragraph 8.23). Policy T1 (f) also refers to the London Plan Policy T4. London Plan policies T4 (C) and (D) refer to the need to mitigate through the provision of, or contributions towards, additional public transport infrastructure.

*(iii) Are all the key linkage/connectivity issues satisfactorily addressed in the Plan?*

The quality and coverage of the transport network varies across the borough, with some areas, particularly in the south of the borough, having a lower level of service than those enjoyed by the north for example. Lambeth's Transport Strategy ([EB43](#)) sets out the strengths and weaknesses of Lambeth's transport network (see Figure 5, p10), and goes on to outline the key actions required to bring about the necessary changes (Outcomes and Actions Plan, p14-29).

Within the Plan, Policy T4 (a) lists the key infrastructure capacity improvements that are needed at transport interchanges and to provide greater network coverage. This includes the Council's support for TfL's 'metroisation' proposals. As set out in Policy T4 (a) (iv) the 'metroisation' of rail services will contribute to meeting future demand in the borough.

As well as improvements to the public transport network, Lambeth aims to create the conditions to encourage a significant switch to walking and cycling, through the creation of a new Healthy Route Network (HRN) in Lambeth (see Transport Strategy [EB43](#), section 5.0). Lambeth proposes to implement the HRN over the lifetime of the Transport Strategy, and the outline programme for delivery is included in Appendix A of the TSIP ([EB43a](#)).

Some representations made comments about the public transport network in the borough, particularly regarding the need for changes to bus routes or bus stop

locations (Brixton Society [R066](#)). The Local Plan is not the appropriate place to contain this level of detail on bus routes and stops. Instead, the Lambeth Transport Strategy ([EB43](#)) sets out how the borough will work with TfL to deliver improvements for bus passengers in Lambeth and to improve bus connections in the south of the borough for example. Bus routes across the borough will also be reviewed as part of the TSIP ([EB43a](#)).

The deletion of para T4 (a) (vii), regarding support for new station stops on the Overground at Brixton and Loughborough Junction, also resulted in a number of representations. Investigations into the feasibility of providing these new station stops concluded there would be significant difficulties in delivering either and thus other projects are prioritised.

## **6.2 Sustainable transport:**

*(i) Should the Plan promote sustainable travel targets and how effectively can they be monitored?*

The London Plan includes the sustainable travel target of mode shift to 90% of journeys in inner London to be made on foot, cycle or public transport by 2041 (London Plan policy T1 Strategic approach to transport - Figure 10.1, p453). To clarify the relationship with the London Plan's strategic approach, the Council proposes to add the text "In accordance with London Plan Policy T1 ,..." to be beginning of Policy T1 (a) in the Plan. The policies in the Plan will enable Lambeth to achieve this London Plan target.

Annex 8 of the Plan includes at IND 16 the same modal share target as a performance indicator, although this currently shows the target as 85%. The Council proposes to amend this target to 90% to align with the London Plan. Progress against this target, measured using data from the London Travel Demand Survey provided by TfL, will be reported in the Authority Monitoring Report.

Lambeth's Transport Strategy ([EB43](#)) and TSIP ([EB43a](#)) sit within the overall framework provided by the Mayor's Transport Strategy (MTS), [EB102](#). In addition to the ambitious mode shift target, the MTS identifies seven additional key outcomes ([EB102](#), p306-308), and TfL provides regular updates to the boroughs to monitor progress. Lambeth's Local Implementation Plan ([EB44](#)) includes three additional measurable objectives with a target year of 2022, to complement the MTS outcomes (Table 19, p90, [EB44](#)).

*(ii) Are the cycling requirements for new developments in policy T3 (cycling), including 25% of cycling racks to be Sheffield stands, justified and realistic?*

Policy T3 (f) includes the requirement for 25% of the total cycle parking provision to be of the most accessible type, such as 'Sheffield' stands. The policy gives Sheffield stands as an example of an accessible type of cycle stand, so developers are free to propose alternative types. The policy is required to ensure that cycle parking is usable and of a high quality. 'Sheffield' type stands offer a simple, easy to use and robust cycle parking solution. A range of locking

positions are possible, allowing the user to secure the frame and both wheels. Section 8.2.5 of TfL's London Cycling Design Standards ([SD32](#)) uses Sheffield stands as an example of good practice.

The policy seeks to ensure that people with disabilities and those less able to use two-tier stand types are not excluded from using the facilities provided. The inclusion of a minimum proportion of cycle stands designated for larger and adapted cycles is also intended to mirror car parking standards, which require a minimum proportion of spaces to be designated and designed for disabled car users (London Plan Policies T6.1 and T6.5).

However, recognising the need for some flexibility, the Council has proposed a potential change of wording in Policy T3(f) to address representations made by HB Reavis ([R060](#)) and Hondo ([R076](#)), to reduce the percentage of cycle parking spaces which should be designed and clearly designated for larger and adapted cycles, from 10 to 5%, and to allow the provision of folding bikes with storage to be considered where a high level of cycle-rail trips are expected (see [SD17a](#), PC048)

The provision of the above levels of Sheffield stands, and stands designated for larger and adapted cycles, is considered realistic and deliverable since it has already been agreed on a number of recent applications. The following are examples of recent planning consents where these levels of cycle parking have been secured:

- 19/01304/FUL: 8 Albert Embankment (resolution to grant December 2019, subject to Secretary of State call-in). Mixed use development including buildings of up to 26 storeys, comprising the re-provision of fire station, new London Fire Brigade museum, up to 443 residential units, a 200 bed hotel, and commercial uses including office and retail
- 19/04592/FUL: 30 - 34 Old Paradise Street, SE11 6AX (resolution to grant July 2020, subject to S106). 6 storey building to provide light industrial use (B1c) and flexible B1a/b/c us..
- 20/01264/RG3: 200-262 Hydethorpe Road And Bound By Thornton Road, SW12.(Granted June 2020) Part 4, part 5 storey building comprising 14 residential units
- 20/01265/RG3: Land Formerly Patmos Lodge 53 Elliott Road (Granted July 2020) Two four storey blocks and five two storey houses to provide 31 residential units

Representations were received from interested parties (including ROK Planning for Unite Students ([R046](#))), relating to the cycle parking requirements of Policies T3 Cycling and Q13 Cycle Storage. In particular, objections were raised to the cycle parking standards for students, which require 0.75 spaces per bedroom (London Plan, Table 10.2, p471). However, the proposed student cycle parking standard follows the new London Plan standard and there is no justification for deviating from the London Plan and setting a different student cycle parking standard in Lambeth. Furthermore, it is noted that the standard is lower than the standard for a studio or 1 bed / 1 person dwelling, which requires 1 space per unit. Lastly, noting the popularity of cycle hire bikes amongst this

demographic, additional wording has already been included in Policies T3 (e) and H7 (viii) of the submitted Plan promoting the provision of pool bikes in these settings.

Representations were also made (including from the HBF [R023](#)) relating to the requirements of Policy T3 (g) and (h), regarding the need for electric cycle charging points and the provision of cycle hire membership for future residents. The objections related to the cost of these requirements and their impact on the viability of the scheme. However, in the case of charge points for electric bikes, this requirement does not need to be very costly to a developer, since most electric cycle battery packs can be charged using a standard electrical socket rather than a specific electric bike charging station. Regarding the cycle hire membership requirement, this is not expected to be a significant cost to the developer.

*(iii) Should the Plan require travel plans as a way of securing sustainable transport and monitoring obligations secured and collecting data on actual demand?*

The Plan mirrors the London Plan in requiring Travel Plans to be submitted in accordance with Transport for London guidance (London Plan Policy T4 (B); Local Plan Policy T1 (f) and supporting paragraphs 8.4 and 8.5).

Supporting paragraph 8.7 of the Plan goes on to state that Travel Plans should also include arrangements for the monitoring of travel patterns. Suitable Travel Plan monitoring fees, as set out in Annex 10 of the Plan, are used to ensure the Council has the funds to engage in the ongoing monitoring of these Travel Plans, including liaising with Travel Plan coordinators, and reviewing the results of travel surveys for example. The Council employs a dedicated Sustainable Travel & Monitoring Officer who fulfils this role. Monitoring fees are secured via planning obligations, as described in supporting paragraph 8.8 of the Plan.

**6.3 River transport:** *Is the encouragement in policy T5 (river transport) for companies in proximity to the Thames to consider using the river for the transport of construction materials and waste through the use of nearby safeguarded wharves in the neighbouring Borough of Wandsworth, justified and realistic? How is 'in proximity' defined and is the policy just aspirational?*

Policy T5 mirrors Policy SI 15 Water transport of the London Plan. London Plan policy SI 15 sections (C), (D) and (I) suggest that development should facilitate an increase in the amount of freight transported by river, including bulk materials during demolition and construction phases; and that boroughs should identify new locations for additional waterborne freight. The MTS ([EB102](#)) also includes a commitment to increasing the proportion of freight moved on London's waterways (Proposal 16 (b)). Action 10 of TfL's Freight and servicing action plan March 2019 ([SD33](#)) sets out how TfL seeks to protect, and promote freight by water, including through the use of a [Water Freight Toolkit](#) providing information to stakeholders and increasing awareness of opportunities for water freight.

Terminals on the River Thames within London currently handle more construction material aggregates than any other port in the UK. Growing demand, from increased consolidation at the Port of Tilbury and from construction and infrastructure projects, is expected to add two million tonnes to current levels on the Thames by 2041 (p88, TfL's Freight and servicing action plan March 2019 ([SD33](#))). The Thames Tideway Tunnel project is expected to transport more than 75 per cent of all the volume of material generated by the scheme by river. The Albert Embankment Foreshore construction site is within Lambeth and a huge number of HGV trips have been avoided within the borough through the use of river transport.

Para 8.29 of the Plan was added in response to representations made by the Port of London Authority at Regulation 18 consultation (see the consultation report [SD16a](#), ref 17/5, p176), which requested that future developments in proximity to the Thames should consider utilising the river for the transportation of construction materials and waste, particularly through the supply chain, including through the use of nearby safeguarded wharves in the neighbouring London Borough of Wandsworth.

'In proximity' to the Thames reflects London Plan Policy SI 15 (I), which says development proposals 'close to' navigable waterways should maximise water transport. The application of this policy will be subject to the local characteristics of the site and will be assessed on a case by case basis. Where there is deemed to be potential for river transport, it will be up to the applicant to demonstrate the feasibility, or otherwise, of this. Given there are no suitable wharves within Lambeth, in reality this would depend on the availability of appropriate road access to the wharves within the neighbouring borough of Wandsworth.

**6.4 *Parking: Is policy T7 (parking) justified and realistic, and is the requirement for electric vehicle charging points effective?***

The car parking standards set out in Policy T7 reflect those within the London Plan, except in the areas of the lowest PTAL where lower parking standards are proposed. These standards seek to minimise or provide zero car parking for all new development. This is considered appropriate in an inner London borough where levels of car ownership are low, and a good range of alternative means of travel are available. Transport for London support Lambeth's proposed approach to car parking (see [SCG01](#)) which will help to reduce car use in the borough and deliver the London Plan ([SD03](#)) target for mode shift to 90% of journeys in inner London to be made on foot, cycle or public transport ([SD03](#), Policy T1 Strategic approach to transport - Figure 10.1).

The Parking Standards Topic Paper ([TP06](#)) sets out further justification for the proposed reduced parking standards in areas of PTAL 1 and 2, concluding that parking provision should not exceed demand, in the context of the evidence of the trend towards declining household car ownership in Lambeth.

On the provision of electric vehicle charging points, policy T7 (d) (iii) and (v) of the Plan refers to the standards set out in London Plan, which require at least 20% of all residential parking spaces to have electric vehicle charging infrastructure (more for other uses – as per the London Plan). This standard



replicates that within the current London Plan 2016 (Policy 6.13 Parking (D)) and has therefore been delivered on many consented schemes. Electric vehicles are a relatively new but rapidly growing technology, and the provision of charging points through development future-proofs for the expected growth in demand. Electric vehicle ownership is expected to become the norm, particularly in the context of the national ban on the sale of new petrol and diesel vehicles which is expected by 2040 at the latest.

Lambeth's Transport Strategy commits to installing a minimum of 200 charge points in Lambeth by 2022 ([EB43](#), p27), of which 133 have so far been delivered ([EB43a](#), p9). Appendix C of the TSIP ([EB43a](#)) provides further detail on how the borough proposes to provide additional electric vehicle charging capacity up to 2025.

Representations were received (including from the HBF [R023](#)) relating to the requirements of Policy T7 (d) (iv) and (v), regarding the provision of Car Club membership for future residents and electric vehicle charging points. The objections related to the cost of these requirements and their impact on the viability of the scheme, and the technical feasibility of the charging point requirements.

Regarding the charging point requirement, the policy follows the new London Plan requirement and there is no justification for deviating from the London Plan and setting a different standard in Lambeth.

Regarding the requirement for Car Club membership, this would not necessarily be very costly to a developer. Developers are free to negotiate favourable membership rates, which if bought in bulk are likely to be less than advertised prices to private individuals. Furthermore, depending on the contract entered into, it is understood that in practice if membership is not taken up by an occupier the developer would not necessarily need to pay the operator for unused memberships.

Objectors also questioned why Car Club membership is required for all residents within a household. Modern households include shared accommodation for whom one Car Club membership may not be sufficient. A question was also raised over whether Car Club membership could potentially be required in perpetuity. The requirement does not specify a minimum (as per Cycle Hire membership, minimum three years membership, Policy T3 (h)) or maximum provision, and is therefore assessed on a case by case basis, but given the relative positions of cycles and cars in the hierarchy (Policy T1 (c)), a Car Club membership requirement would not in practice exceed the Cycle Hire membership requirement of three years.

The representations regarding the requirement for Car Club membership for '*all residents*' (Policy T7 (d)) highlight an inconsistency with Policy T3 (h) which only requires cycle hire membership for '*each dwelling*'. The Council therefore proposes to amend the wording of Policy T3 (h), from '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' to 'A minimum of three years free membership of the Cycle Hire scheme for *all residents* regardless of tenure, should be provided in new residential developments'.

**6.5 Servicing:** *Is policy T8 (servicing), to promote sustainable freight servicing, including through off-site consolidation, effective?*

Policy T8 reflects London Plan Policy T7 Deliveries, servicing and construction. The uptake of freight consolidation is growing across London; see the examples cited within Freight Consolidation Supplementary Evidence ([EB51](#), p21, p24). A number of organisations within the borough are already utilising freight consolidation, and as a growing industry, the infrastructure supporting freight consolidation is continually improving, and uptake is expected to increase.

Increased freight consolidation within the borough is therefore considered to be realistic and deliverable. Furthermore, freight consolidation and the use of planning obligations to secure caps on servicing trips has successfully been agreed on a number of recent applications, for example:

- 19/01304/FUL: 8 Albert Embankment (resolution to grant December 2019, subject to Secretary of State call-in). Mixed use development including buildings of up to 26 storeys, comprising the re-provision of fire station, new London Fire Brigade museum, up to 443 residential units, a 200 bed hotel, and commercial uses including office and retail
- 19/01477/EIAFUL: Elizabeth House, York Road, SE1 (resolution to grant October 2019, subject to S106) A new building ranging between 12 and 31 storeys (plus basements), to provide 146,170sqm office and 8,900sqm flexible floorspace
- 19/02643/OUT: Lambeth College Vauxhall Centre Belmore Street SW8 2JY (Granted June 2020). A new College facility, plus 15,000 sqm of College floorspace, up to 272 student bed spaces and up to 4,570 sqm of shared workspace