

## **Examination of the Draft Lambeth Local Plan 2020-2035**

### **Matter 6 – Transport and Communication**

#### **6.2 Sustainable transport**

##### **ii) Are the cycling requirements for new developments in T3 (cycling) justified and realistic?**

Part g) – has not been justified in terms of cost. The policy requires that 1 in 10 cycle spaces should provide electrical charging. This will cost £1,070 per charging point.

Part h) requires that the applicant provides a minimum of three years free membership of a cycle hire scheme for each dwelling. The cost of this has not been assessed. Nor does it meet the tests for planning obligations.

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

The Lambeth Local Plan's policy on parking is unsound as it is contrary to the Secretary of State's directed changes to the Draft London Plan (13 March 2020).

The Secretary of State's directed changes to the Mayor's 'Intend to Publish' version of the Draft London Plan has changed the parking standards for London.

The Lambeth Local Plan policy T7 specifies that in PTAL 2 up to 0.25 spaces of car-parking space can be provided per unit. In PTAL 1 up to 0.5 spaces per unit can be provided. The Secretary of State has changed this to:

Inner London PTAL 0-1 – up to 0.75 spaces per dwelling

Inner London PTAL 2 - up to 0.5 spaces per dwelling

The Lambeth Local Plan will need to be changed accordingly.

#### **Car club membership**

We refer to our representations. In summary, the provisions in part iv) relating to providing car club membership for all residents in new residential developments has not been costed and fails the tests for planning obligations (NPPF, paragraph 56).

#### **Electrical vehicle charging points**

Part v) of the policy requires compliance with the Draft London Plan policy T6.1 on residential parking.

Draft London Plan policy T6.1 Residential Parking requires at part c) that all residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should provide active charging facilities, with passive provision for remaining spaces.

The cost of this has not been assessed within the Lambeth viability assessment. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7 October 2019) has assessed that the cost of this is £976

EVCP per charging point. Persimmon Homes has assessed the cost to be £500 per house plus £10k for cabling for 16amp charging (3.6kw). This is a slow overnight charge.

Nor have we been able to detect any engagement with the main energy suppliers to determine whether there is capacity in the network to enable this. New sub-station infrastructure may be necessary, and the cost of this is considerable.

Furthermore, as we have discussed in our representations, there are considerable practical difficulties in providing charging points in apartment schemes. This is because if residents do not run cars, let alone electric cars, they would be forced to pay for the electricity consumed by electric car owners as this cannot be apportioned to the electric car owner. It would be patently unfair on residents who do not run cars to pay for the electricity of those that do.

For these reasons, the policy requirement for electrical vehicle charging points fails the fair and reasonable test for planning obligations.

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