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**Ref: R015**

Planning Policy Team  
London Borough of Lambeth  
PO Box 734  
Winchester, S023 5DG

Sent by email to: [localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

11 March 2020

Dear Sir/Madam,

**DRAFT REVISED LAMBETH LOCAL PLAN - PROPOSED SUBMISSION  
VERSION JANUARY 2020**

Thank you for the opportunity to comment on Lambeth's Proposed Submission Draft Local Plan consultation. We refer to the signed Statement of Common Ground which sets out details of engagement on cross-boundary strategic matters. In summary, we consider that the draft revised Lambeth Local Plan is legally compliant and 'sound'; comments on specific aspects of the draft plan are provided below.

The London Borough of Bromley (LBB) shares a very limited (approximately 90m) boundary with Lambeth at Crystal Palace Parade, along the ridge of Crystal Palace. LBB supports the broad objectives of the Proposed Submission Local Plan and look forward to continuing to work with the Lambeth Council to ensure that the future implementation of this Local Plan has positive effects with regard to cross-borough matters. We would particularly welcome further engagement on the proposed Site Allocations DPD, specifically any sites which could have cross-boundary implications.

The reduction in the housing target from Lambeth's 2018 draft Local Plan, to reflect the London Plan 'Intend to Publish' document, is noted. The reduction was made in response to the Inspectors Panel recommendations and positively reflected significant concerns expressed by Bromley and other boroughs in respect of the unrealistic small site component of the housing target.

LBB welcomes Lambeth's commitment to protect existing Gypsy and Traveller provision in the Borough to meet existing and identified future need.

The expansion of Policy PN11 Upper Norwood to include Crystal Palace is welcomed, specifically the reference to the Strategic Outer London Development Centre (SOLDC) as suggested in Bromley's previous representations on the October 2018 Draft Revised Lambeth Local Plan. However the draft new London Plan has now replaced references to specific SOLDCs (identified in the 2016 London Plan)

with encouragement for Local Authorities to identify such designations, as Bromley has done. It is therefore requested that a further amendment is made to paragraph 11.152 to clarify that the Bromley Local Plan (2019), not the London Plan, identifies the SOLDC.

Bromley supports draft Policy PN11(d) which seeks to improve Crystal Palace Triangle traffic conditions through joint working with TfL and adjoining boroughs.

Lambeth proposes to adopt the draft new London Plan parking standards apart from in PTAL areas 1 and 2 where a lower maximum standard is proposed. We would be concerned if lower parking standards in Lambeth meant a potential increase in parking pressures in Bromley. However, given that the parts of Lambeth adjacent to and in close proximity to Bromley are high PTAL (predominantly 5 and 6a), it is less likely that there will be high instances of car ownership/usage in any development which did come forward in this area; this suggests that increases in parking pressure will not materialise.

I hope that the above comments are helpful. We look forward to further co-operation and engagement on this and other Lambeth planning policy documents. If you have any questions regarding any matters raised in this letter, please do not hesitate to contact me via the details above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B. Johnson', followed by a long horizontal line extending to the right.

Ben Johnson  
Head of Planning Policy and Strategy  
London Borough of Bromley