



13th March 2020

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Dear Sir / Madam,

Consultation on the Pre-submission publication of the Draft Revised Lambeth Local Plan.

Thank you for providing the opportunity to comment on the Pre-submission publication of the Draft Revised Lambeth Local Plan.

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 landowner in the borough only and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London. Our colleagues in TfL Spatial Planning have provided a separate response to this consultation in respect of TfL-wide operational and land-use planning / transport policy matters as part of their statutory duties.

TfL CD has previously submitted representations on the Local Plan through the following consultations:

- Local Plan Partial Review, December 2017
- Draft Revised Local Plan, December 2018

TfL CD is a significant landowner in the borough and has identified a number of sites for residential-led, mixed use development which will make a significant contribution towards meeting borough and London-wide housing targets. In December 2018, we promoted the following sites for site allocations through the Local Plan consultation:

- Montford Place
- North Vauxhall
- Land at Christchurch Road and Streatham Hill
- Brixton Tramshed, Brixton Hill
- Stockwell Station

Further details of these sites are provided in Appendix 1.

Our representations in respect of the Pre-submission publication of the Draft Revised Lambeth Local Plan are set out below in accordance with your key topic headings and we make reference to the Councils 2019 Consultation Statement where necessary.

Spatial Vision and Strategic Objectives



TfL CD broadly supports the Spatial Vision set out for Lambeth and strategic objectives. We particularly support the boroughs commitment to delivering at least 13,350 additional dwellings over the next ten years, in line with the Draft London Plan housing targets (Table 4.1), and the contribution this will make to the Mayors target of 50% new housing to be affordable. TfL CD is committed to delivering 50% affordable housing (by habitable room) across its portfolio as instructed by the Mayor and look forward to working with Lambeth to achieve this on TfL owned sites. We also support the focus for growth within the Waterloo and Vauxhall Opportunity Areas. TfL CD has landholdings in both Opportunity Areas which we are seeking to optimise in line with the Intend to publish London Plan and National Planning Policy Framework 2019.

Section 4: Delivering the Vision and Objectives

Policy D1 Delivery and monitoring

TfL CD agrees with paragraph (a) which states that sustainable development and regeneration opportunities should be fully explored, including optimising the use of previously developed land. Draft London Plan Policy H1 stipulates that boroughs should proactively use brownfield registers to optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans.

Section 5: Housing

Policy H1 Maximising housing growth

TfL CD strongly supports Policy H1. We particularly agree with paragraph i) which states that the Council should work with relevant partners to optimise the potential for housing delivery on all suitable and available brownfield sites, in line with the Draft London Plan. However, we believe the policy should stipulate that sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary should be prioritised, in line with Draft London Plan Policy. TfL CD own a number of highly accessible brownfield sites within the borough and we look forward to working with the council to ensure they are fully optimised through residential-led development. We also support the design-led approach outlined in paragraph iii) which aligns with Draft London Plan Policy D3.

We 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, as noted in paragraph iv). 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.

Policy H2 Delivering affordable housing

TfL CD agrees with paragraph a) which states that the Council should seek to maximise the delivery of affordable housing in accordance with London Plan policy. TfL is committed to delivering at least 50% affordable housing across its development portfolio in London and looks forward to working with the borough to bring forward appropriate levels of affordable housing on sites in our ownership.

Policy H12 Build to Rent



In respect to draft Policy H12 Build to Rent, separate Regulation 19 draft Local Plan representations have been prepared on behalf of Connected Living London (CLL), the joint venture partnership between TfL and Grainger, plc (GPLC) which is seeking to bring forward Build to Rent development in the borough. As currently drafted, the policy is considered to be unsound. The content of these representations is fully supported by TfL CD and should be read in parallel with these representations, as well as the previous Regulation 18 draft Local Plan representations made by TfL CD.

Policy ED2 Affordable Workspace

In 2018 Local Plan representations, we raised concerns about the viability impact of affordable housing provision alongside affordable workspace. We note from the Councils Consultation statement 2019 the addition of the following wording:

'f) Proposals that do not provide the level of affordable workspace required by this policy will be required to submit viability information, which will be independently assessed. Where this assessment determines that a greater level of affordable workspace could viably be supported, a higher level of affordable workspace will be required. In addition, early and late viability reviews will be applied to all schemes that do not provide the level of affordable workspace required by the policy.'

This additional wording supports the delivery of affordable workspace but fails to address the cumulative viability impact that is likely to occur when mixed-use schemes are required to deliver higher levels of affordable housing in addition to the requirement to deliver affordable workspace.

Policy ED3 Key Industrial and Business Areas (KIBAs)

TfL CD strongly supports intensification and co-location with residential and other uses within certain areas of KIBA's, specifically the KIBA at Montford Place. Co-location is an innovative land-use which can unlock underutilised brownfield land and encourage the most efficient use of land, in line with Draft London Plan Policy E7. TfL CD is currently working to bring our Montford Place site within the KIBA forward for mixed-use development including both residential and employment floor space so this policy is welcomed.

Policy ED13 (Visitor Attractions, leisure, arts and cultural uses)

TfL CD supports the main premise of this policy; to support visitor attractions and major leisure and cultural activities within the CAZ, Vauxhall and Waterloo London Plan Opportunity Areas and Brixton and Streatham major town centres.

Part (c) of the policy sets out that redevelopment of existing visitor attractions, leisure, arts and cultural uses will only be supported where the existing use is re-provided on site, or a replacement facility is provided elsewhere in the locality (underline is our emphasis). It also allows, in exceptional circumstances, for commuted payments for replacement leisure, arts or cultural uses elsewhere in the borough.

We believe this policy requirement could be interpreted in an overly narrow sense in respect to the type of use that is re-provided on site or elsewhere in the locality. For example, a site may be currently occupied by a gym in an open D2 use class. The policy, as interpreted in its narrow meaning, may seek a replacement gym use to be provided at the site rather than an open Class D2 use, which could then be occupied by a different leisure use should demand change. We also feel that there should be some provision for a change of use to alternative uses if demonstrated that re-providing the current use is an unviable proposition,



such as the policy provisions present when considering the loss of B1a offices under Policy ED14.

We therefore recommend that the policy wording is changed as follows:

*“Change of use or loss of existing visitor attractions, leisure, arts and cultural uses will not be permitted, **unless it is demonstrated that the site has no demand for the existing use.** Redevelopment for mixed use will only be supported where the existing Use **Class** is re-provided on site, or a replacement facility is provided elsewhere in the locality. In exceptional circumstances, commuted payments may be accepted for replacement leisure, arts or culture uses elsewhere in the borough.”*

The supporting text could set out the tests to demonstrate a lack of demand for a particular use, or it could be included in the policy wording.

We question whether the supporting text paragraph 6.93 should read section (d) of the policy, instead of section (c)?

Policy ED14 (Hotels and other visitor accommodation)

TfL CD supports the main premise of Policy E10; insofar as it is supportive of visitor accommodation in major and district town centres. TfL are also supportive of part (b) of the policy, in principle, which allows for visitor accommodation in Vauxhall. However, we consider it overly restrictive to seek to prevent additional visitor accommodation in predominantly residential neighbourhoods. The Vauxhall CAZ is characterised by a mix of uses albeit some areas undergoing change in the Opportunity Areas will have notable elements of residential accommodation. With robust operational management plans and servicing management plans, the impact of a hotel to nearby residential amenity can be handled in an appropriate manner. We therefore encourage the Council to relax this policy provision, though we expect the wording to be amended carefully to ensure that the impact on residential amenity can be adequately addressed.

We also consider part (b) (ii) overly restrictive with regards to the size of hotels outside of the Opportunity Area within the CAZ. The 100 room limit is considered overly restrictive as impact on nearby residential amenity from a 150 room hotel, if managed effectively, for example, can be wholly appropriate. We therefore encourage the Council to increase the room limit under this part of the policy to 150 rooms. This will likely result in more viable operations coming forward in such locations. The Council would retain the ability to resist them if they are not satisfied on their amenity impact or the impact it would have on the surrounding land use mix.

Part (j), which requires all new hotels to provide facilities for business visitors, including meeting rooms and workspaces is considered to place an overly onerous burden on small hotels. TfL CD believes this requirement is only appropriate on hotels over a certain size.

Policy ED15 Employment and training

TfL CD supports this policy in principle, however we believe that whilst a minimum of 25% all jobs created by the development (in both the construction phase and for the first two years of end-use occupation of the development) is a worthwhile policy aspiration, it is likely to be difficult to achieve.

The unemployment rates in Lambeth and Greater London is currently 5.3% and 4.6% respectively. These low unemployment rates could make it difficult for new development to



achieve the 25% target. London's workforce is highly mobile and it is common for workers to be employed outside of the local authority in which they live. With regard to the construction sector, the Annual Population Survey (July 2018 to June 2019) shows that approximately 7000 Lambeth residents work in the skilled trade / construction sector. However, according to the Business Register and Employment Survey there are only approximately 5000 construction jobs in the Borough. This suggests that most Lambeth residents in the construction sector are employed outside of the Borough.

Whilst it is likely that some workers would prefer to work locally, it may be difficult to recruit them if they are already employed elsewhere. There is currently an acute shortage of construction workers in London which is being further exacerbated by Brexit negotiations. While labour supply in the Borough for the construction sector is high, construction workers often have little control over the location of their workplace. It is doubtful that construction workers who are currently employed outside the Borough would choose to relocate their job to Lambeth if it required a change of employer. The benefit of an easier commute is likely to be temporary and would probably be outweighed by the risk of changing to a new employer. A similar dynamic is likely to be found in other sectors of the economy.

In addition, Lambeth's Investment and Opportunity Strategy identifies that there are severe skills shortages in the construction industry across the capital that construction companies building in Lambeth are unable to recruit.

The Council's response in the Consultation Report December 2019 to our previous comment on this policy was:

'The council wishes that development benefits local residents. There is already sufficient flexibility in criteria iii) to take into account site specific circumstances when determining qualifying applications, for instance if it's not realistic to seek 25 per cent local employment.'

Again, we would reiterate that this is a worthwhile policy aspiration. However, it is unclear where the 25% requirement comes from and given the points raised above 25% is a high bar to set and is not in line with paragraph 16 of the NPPF 2019 which states that plans should be prepared positively, in a way that is aspirational but deliverable.

Section 8: Transport and communications

Policy T1 Sustainable travel

TfL CD supports paragraph a) which outlines the Council's commitment to promoting a sustainable pattern of development across the borough, maximising trips made by sustainable modes and reducing dependence on the private car. This policy is in line with TfL CD objectives and the Mayors Transport Strategy.

Section 10: Quality of the built environment

Policy Q7 Urban design: new development

We note the addition of the following wording to paragraph 10.27 supporting text of Policy Q7:

'Generally the greatest height within any development should be to the street frontages with subordination in scale and height at the rear in response to the character and constraints of the context.'



TfL CD considers this wording as potentially restrictive to development. It is overly prescriptive and could mean that development sites are not optimised to their full capacity. Draft London Plan Policy D3 Optimising site capacity through the design-led approach stipulates that a range of design options should be considered to determine the most appropriate form of development that responds to a site's context and capacity for growth. As currently drafted, Policy Q7 applies a 'blanket' approach to site design by assuming all sites will benefit from height at street frontage, therefore conflicting with Draft London Plan Policy D3. Draft London Plan Policy D4 Delivering Good Design reiterates that potential design options for an area, site or development proposal should be explored. We suggest that this wording is removed and replaced with words to the effect of:

'Developers should follow the design-led approach, as outline in Draft London Plan Policy D3, to ensure sites are optimised to their full capacity and development responds appropriately to a site's context and capacity for growth.'

Policy Q26 Tall buildings

TfL CD broadly supports Policy Q26, which aligns with Draft London Plan Policy D8 Tall Buildings.

Section 11: Places and Neighbourhoods

Policy PN1: Waterloo and Southbank

TfL CD is supportive of this policy's provisions in principle. Part (e) of the policy promotes and supports development and uses of an appropriate height (in accordance with Local Plan Policy Q26 and Annex 11). Upon review of draft Policy Q26 and Annex 11, we note a typo in Annex 11 in respect to the height deemed appropriate in principle at Waterloo Roundabout. This should read 130m AOD, not 30m AOD as currently drafted. This change is necessary if Annex 11 is to align with Annex 1: Evidence Base on this matter, Draft London Plan Policies H1 Increasing Housing Supply, D3 Optimising site capacity through a design-led approach and D8 Tall Buildings.

Policy PN2: Vauxhall

We do not wish to raise any comments to this draft policy at this stage.

Site 13: Site 13: Plot bounded by 7-93 Wandsworth Road, Parry Street, Bondway including the bus station SW8 (Vauxhall Island Site)

TfL CD generally supports this site allocation for *'Town-centre-led mixed-use development centred on Bondway and the existing bus station. Retail and other town-centre uses on the ground floor and above to form a new high street onto Bondway, with active non-retail uses on the Wandsworth Road frontage and residential on the upper floors.'*

We welcome the opportunity to work with the borough to redevelop Vauxhall Bus Station, contributing to the wider objective to create a new Vauxhall town centre. We suggest that the site allocation clearly states that in order for development on this site to be brought forward and the bus station to undergo redevelopment, the Vauxhall Gyratory requires significant reconfiguration.

It should also be noted that such reconfiguration will unlock a new TfL site to the north of the interchange, Vauxhall North (See appendix 1). This site presents a significant potential development opportunity, in line with the objectives of the Nine Elms Vauxhall (NEV)



Opportunity area. As such, we request that this site is allocated for residential-led mixed-use development, to come forward alongside the Vauxhall town centre regeneration.

Kennington / Oval

TfL CD strongly supports paragraph 11.118 which states *'The Oval gasworks and other land in the vicinity are to be transformed into a vibrant mixed-use area. There is potential for industrial intensification and colocation with residential on the TfL owned land in the KIBA at Montford Place.'* TfL CD is currently working to bring this site forward for mixed-use development including both residential and employment floor space.

We trust that we have provided sufficient information for the Council to be able to consider our representations in respect of the Pre-submission publication of the Draft Revised Lambeth Local Plan. However, if you require any additional information, please do not hesitate to contact me.

Yours sincerely,

Lucy Wakelin

Assistant Planner, Transport for London | Commercial Development





Appendix 1: Additional site allocations



<p>Montford Place</p>	<p>Draft Local Plan allocation: Allocated within Key Industrial and Business Area as suitable for a co-location of industrial and business uses.</p> <p>Proposed uses: Residential-led mixed-use development (B1C uses with residential development).</p> <p>TfL CD is currently working to bring this site forward for mixed-use development including both residential and employment floor space. This is a highly accessible site with an excellent PTAL rating which should be optimised in line with Draft London Plan Policy and the National Planning Policy Framework.</p>
<p>North Vauxhall</p>	<p>Proposed uses: Mixed-use development</p> <p>This is a new site which will be unlocked through the Vauxhall Gyratory reconfiguration. It has the potential for significant residential-led mixed-use development which will contribute to the creation of a new Vauxhall town centre.</p>
<p>Land at Christchurch Road and Streatham Hill</p>	<p>Proposed uses: Community-led residential development (100% affordable) with publicly accessible open space</p> <p>TfL CD considers that this site should come forward as a wholly affordable housing scheme led by the community, whilst also providing accessible open space to the benefit of residents and the wider local community.</p> <p>The site is adjacent to the eastern side of Streatham Hill Road and the southern side of Christchurch road. The site is currently vacant and has no public access. Previous site uses comprise residential development as a continuation of the housing line along</p>



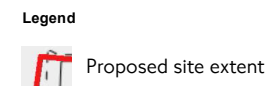
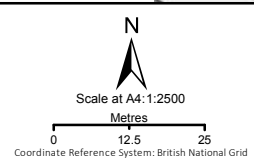
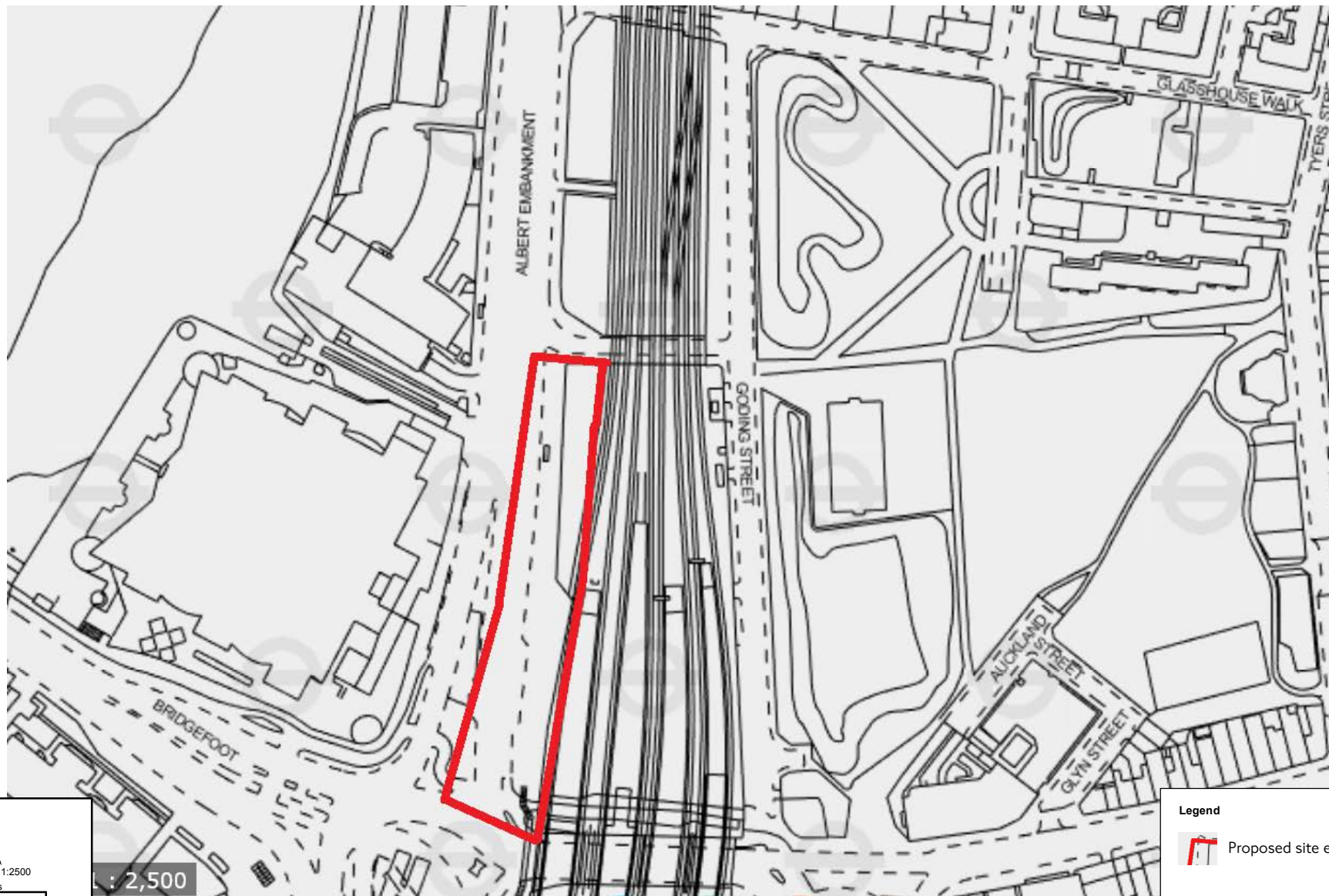
	<p>Streatham Hill, and post-war pre-fabricated residential bungalows The site contains five mature trees which have Tree Preservation Orders.</p>
Brixton Tramshed, Brixton Hill	<p>Proposed uses: Residential-led development</p> <p>TfL CD believes that a residential development could be developed on the Brixton Tramshed site incorporating the existing bus station uses. The site is currently a large bus station with potential for intensification of the station to co-locate it with residential development on the site. The development would be sensitive to the listed buildings and conservation area in close proximity to the site. The site has a PTAL of 6b making suitable for car free development in line with the Intend to publish London plan.</p>
Stockwell Station	<p>Proposed uses: Residential-led development</p> <p>Stockwell station presents a potential opportunity for redevelopment to provide residential development above the station and on adjoining land. The site has an excellent PTAL rating of 6b and it should be optimised in line with Intend to publish London Plan Policy and the National Planning Policy Framework 2019.</p>

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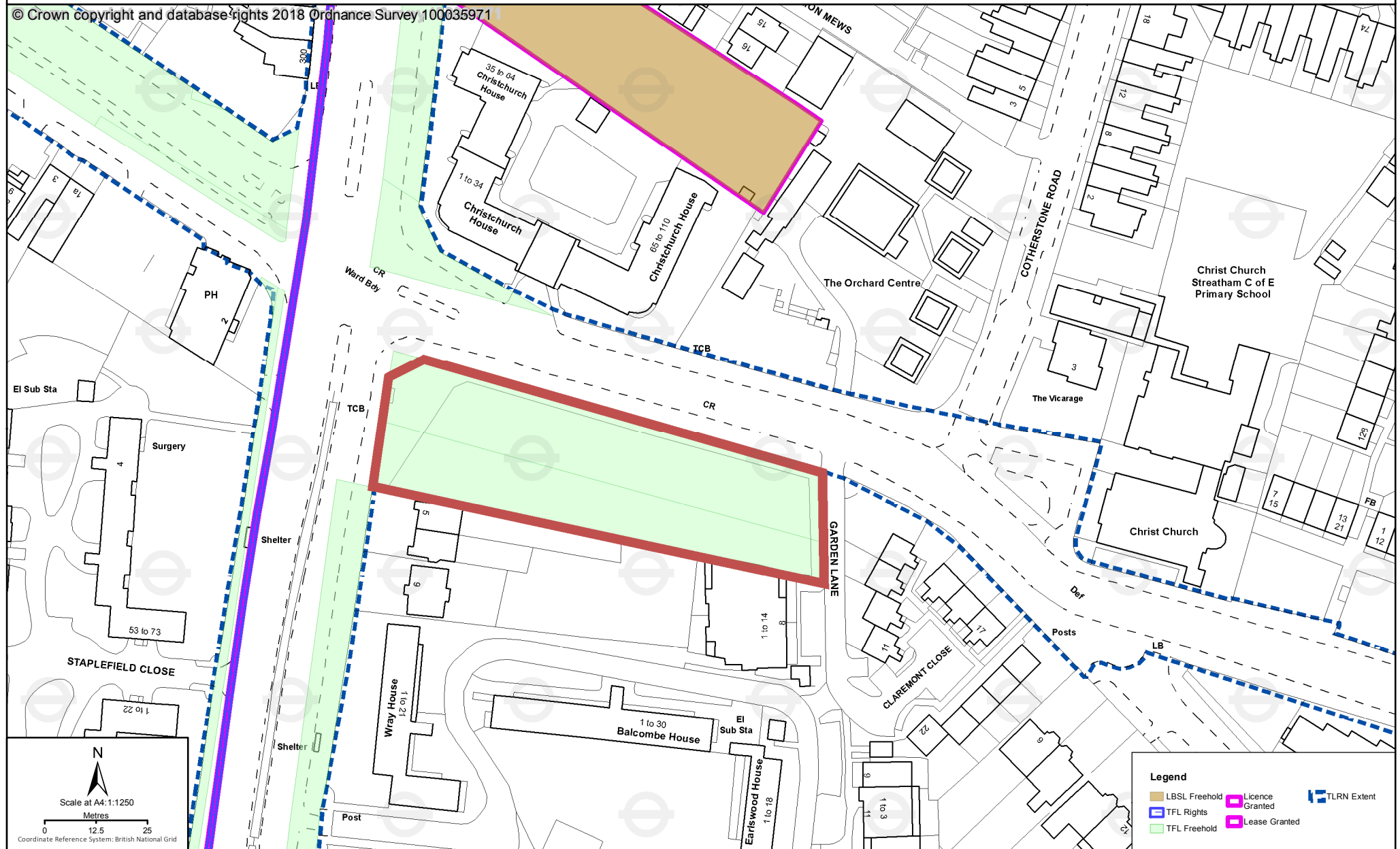
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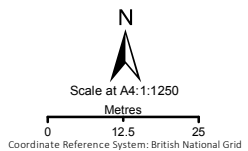
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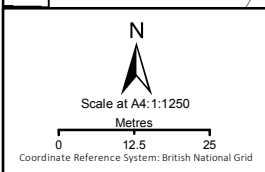
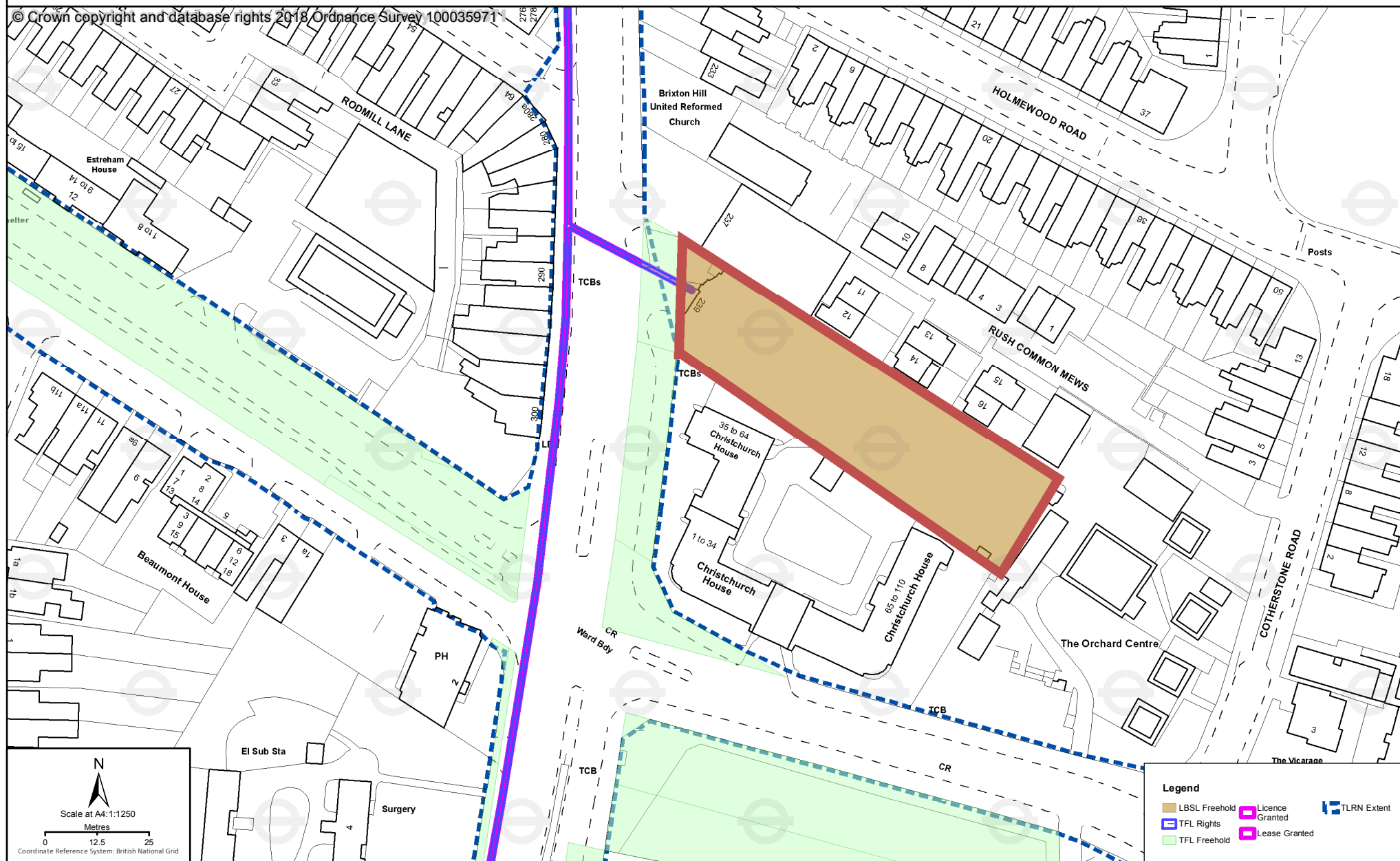
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