



**Transport for London**  
City Planning  
5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

TfL Ref: LMBT/20/24

London Borough of Lambeth  
[localplan@lambeth.gov.uk](mailto:localplan@lambeth.gov.uk)

13/3/2020

Dear Sir/Madam,

**Re: Lambeth Draft Revised Local Plan and associated Proposed Changes to the Policies Map (January 2020)**

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Property to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment on Lambeth's Draft Revised Local Plan and associated Proposed Changes to the Policies Map (January 2020). As the council are aware, the draft London Plan is at an advanced stage in its adoption process the Intend to Publish version of the London Plan is now available on the [GLA website](#). We strongly support the close alignment of Lambeth's policies to those set out in the Intend to Publish version of the London Plan, and greatly appreciate the inclusion of many of our previous Regulation 18 comments in Lambeth's Draft Revised Local Plan.

In particular, we welcome the council's commitment to addressing the climate emergency, the housing crisis and other health and environmental challenges. We strongly support the council's focus on reducing car use and increasing walking, cycling and public transport use in achieving this. We also welcome references made to the application of the Healthy Streets Approach and Vision Zero strategy.

We strongly support Lambeth's car parking policies and welcome that these go beyond the minimum restraint that is required by the draft London Plan. Implementation of these standards will not only minimise the congestion, emissions and road danger created by new developments in Lambeth, but will also help the council meet its commitment to create an economically, socially and environmentally sustainable borough. We welcome the cycle parking requirements and the emphasis

on quality as well as quantity. We also welcome the requirement for development proposals to enable and contribute towards improvements to cycle access, including the delivery and improvement of local and strategic routes.

We welcome references made to the impact that Crossrail 2 will have on Lambeth's wider infrastructure capacity and the council's commitment to work with TfL to deliver 'metroisation'. The document's recognition of the important role of buses in providing strategic and orbital public transport connections across the borough is welcomed and will also improve the lives of those who require step free options. We strongly support the council's commitment to improving bus services through bus priority measures, enhancing key interchanges and providing more bus stations, stands and new services to improve local connectivity.

The policy recommendations in Lambeth's Places and Neighbourhoods section also broadly align with environmental aspirations to reduce traffic, support active travel and create greener streets. We do however have comments on specific areas in order to fully align them with ongoing work and wider policy commitments.

Our responses to the questions raised Lambeth's Draft Revised Local Plan are set out in more detail in the attached appendix.

We look forward to contributing further in the development of your Local Plan.

Yours faithfully,

**Josephine Vos**

**London Plan and Planning Obligations Manager | City Planning**

josephinevos@tfl.gov.uk



## Appendix: Specific suggested edits and comments from TfL on Lambeth’s Draft revised Local Plan (Reg 19)

Section	Page	Track change/comment
Duty to Co-operate	10	We strongly support Lambeth’s commitment to improve rail services in south London through ‘metroisation’. We also welcome the council’s support for improving existing and planned strategic bus corridors and cycle routes to improve orbital and radial journeys. However, we note that council supports the extension of the Tram network to Crystal Palace. TfL is not actively progressing this scheme as it is unlikely to be good value for money. We therefore would suggest the removal of this scheme from the list of transport infrastructure projects.
Transport	19	We note that there is not spare capacity on Thameslink services between London and Herne Hill during peak hours. Text in paragraph 2.40 could be amended to read: ‘During peak periods rail services in Lambeth are currently at or over capacity, particularly services from Clapham Junction to Waterloo and Herne Hill to Victoria and Blackfriars.’
Transport	20	We appreciate that a number of rail and tube stations in the borough lack step free access. Support for increasing step-free access at stations through developer contributions could be mentioned in this paragraph, in particular at key interchanges such as Waterloo where only the London Underground platforms are (partially) step free.
Transport	20	We appreciate that a number of rail services in Lambeth are currently at or over capacity as mentioned in paragraph 2.40. A reference to Crossrail 2 could be added here as a key transport investment that would relieve Clapham Junction to Waterloo trains, as well as the Victoria and Northern lines and the Network Rail/London Underground interchange at Vauxhall.

<p>Policy D4 Planning Obligations</p>	<p>67</p>	<p>We note that Policy D4 includes a long list of potential planning obligations, but does not identify key priorities. As the council are aware, the NPPG was amended last year and now clarifies that formulaic/tariff approaches to planning obligations should be set out in the Local Plan. We note that Lambeth's revised Local Plan now sets out additional calculations for employment and training, affordable workspace, development resulting in a loss of kerbside space, travel plan monitoring and controlled parking zones in Annex 10 of their Local Plan. However, we are concerned that an increasing number of obligations are subject to formulas, without any indication of priority.</p> <p>Policy DF 1(d) in the London Plan states that priority should firstly be applied to affordable housing and necessary public transport improvements before other contributions. We would therefore appreciate it if this could be reflected in Lambeth's Planning Obligations Policy to avoid challenges being made to other planning obligations that are not subject to a formula.</p>
<p>Policy ED8 Evening economy and food and drink uses</p>	<p>148</p>	<p>Drive through takeaways represent a poor use of land and impact negatively on walk, cycle and public transport through increased congestion and road safety issues. We strongly support that proposals for drive-through takeaways will not be permitted and that redevelopment of existing sites will be supported.</p>

Policy T1 Sustainable Travel	191/192	<p>We support the policy overall and strongly welcome the reference to the application of London Plan Policy T2 Healthy Streets and Policy T4 assessing and mitigating transport impacts (noting that the addition of the latter appears to have replaced draft Lambeth policy T6).</p> <p>We welcome the intention of Lambeth’s road user hierarchy set out in part c. However, we would urge the council to consider some additional nuance around the role of cycling and buses. The two modes need to be considered together to maximise sustainable mode share overall and the benefits each mode offers. There are sections of the road network in Lambeth where buses play a key role in providing transport capacity, as well as greater accessibility, and this needs to be considered alongside expanding access to cycling. In particular, buses play a key role in making London accessible, both in terms of cost of travel and for people who are less able to walk long distances or use stairs and escalators.</p> <p>We also welcome the additional policy requirement for all developments to reduce danger to help meet the Mayor’s Vision Zero ambition. Reference to this policy could also be made in Policy T2 Walking and Policy T3 Cycling in either the main policy section or supporting text, in addition to referring to Lambeth’s Healthy Route Plan.</p>
Policy T2 Walking/T3 Cycling	197/200	We strongly support the walking and cycling policies and welcome the alignment with the approach of the draft London Plan to promote and enable walking and cycling within the borough.
Policy T3 Cycling	200	<p>Policy T3 (h) could be improved by adding text at the beginning of the policy to read:  ‘Uptake of cycle hire business accounts should be encouraged for occupiers of commercial developments as part of the travel plan measures.’</p> <p>Policy T3 (e) refers to pool bikes being provided where appropriate. This policy should define what ‘pool bikes’ are in the policy itself or additional supporting text. These should be provided in addition to the cycle parking requirements for new developments and not in lieu of the minimum parking spaces required.</p>

Policy T3 Cycling	200/201	<p>We support policies that will ensure good quality cycle parking. In that regard, we welcome the requirement for at least 25 per cent of the total cycle parking provision to be of the most accessible type, such as ‘Sheffield’ stands and, within this, 5 per cent to be designed and clearly designated for larger and adapted cycles in all developments. This will enable a wider range of people to cycle and will enable cycle to be used for a range of different journey purposes.</p> <p>Similarly, we welcome Policy T3 (g) which sets the requirements for all developments to have at least one charge point to allow for recharging of electric cycles, with a charge point provided for a minimum of 1 in 10 cycle parking spaces. This policy could be further developed to prioritise/ensure an appropriate mix across stand types, particularly for larger/cargo cycles which may be more likely to require electric assistance.</p>
Policy T3 Cycling	200	<p>We strongly support that Development proposals will be expected to enable and contribute towards improvements to cycle access, including the delivery and improvement of local and strategic routes and links. The council may wish to consider specifying the conditions under which developer contributions will be expected to be made to the cycle networks within Lambeth, for example by defining a catchment around strategic routes as LB Richmond-upon-Thames have done in their recent draft Transport SPD.</p> <p>We also strongly support the requirement for land and/or finance developer contributions towards the delivery of new cycle hire docking locations and other public facilities ancillary to cycling, such as cycle pumps/servicing facilities.</p> <p>A number of developments in Lambeth have also secured free membership for Cycle Hire schemes through S106 agreements. We therefore support the policy requirement for a minimum of three years free membership of the Cycle Hire scheme for each dwelling regardless of tenure, to be provided in new residential developments. For the sake of clarity, cycle hire caters for a different market/model of cycle usage to personal cycle ownership, and so cycle hire access should be provided in addition to and not in lieu of the minimum cycle parking requirements as set out in Policy T5 in the draft London Plan.</p>

Policy T3 Cycling	201/202	Supporting text in paragraph 8.18 could be improved by requiring cycle parking provision to be located near active frontages, in addition to being near entrances in prominent locations. Reference could also be made for cycle parking facilities to be made in line with the requirements set out in the London Cycle Design Standards (LCDS), though we do note that this reference is made in Policy Q13 for cycle storage.
Policy T4	203	We welcome Lambeth's commitment in Policy T4 a(v), (b) and (c) to improve bus services in Lambeth, including supporting bus priority measures, new services to improve local connectivity to the Vauxhall Nine Elms Battersea Opportunity Area, and a long Albert Embankment, improved bus provision at key interchanges at Waterloo, Vauxhall and Brixton and proposals to improve and provide more bus stations and stands.
Policy T4 Public Transport Infrastructure	203	<p>We support the removal of 'new stations stops on the London Overground network at Brixton and Loughborough Junction' from the list of public transport infrastructure, as it has been proved very hard to define a sufficient business case for them.</p> <p>The need to improve rail services in the borough can best be met through TfL's 'metroisation' proposals and we welcome that Lambeth's Local Plan supports this.</p> <p>As previously mentioned, TfL is not actively progressing the development of the extension of the Tram network to Crystal Palace as it is unlikely to offer good value for money. We therefore would suggest the removal of this scheme from the list of transport infrastructure projects.</p>
Policy T4 Public Transport Infrastructure	203 / 205	<p>We welcome reference to the delivery of Crossrail 2, which will improve public transport capacity in Lambeth despite not directly serving stations in the borough. However, the supporting text in paragraph 8.25 could be improved to accentuate the benefit that Crossrail 2 will bring to the borough, such as by freeing up significant capacity into Waterloo.</p> <p>Text could be amended to read: 'Although there are no planned stations in the borough, Crossrail 2 will have a <b>beneficial transformational</b> impact on public transport capacity in Lambeth...'</p>

Policy T7 Parking	211	<p>We strongly support Lambeth’s Local Plan Parking Policy, which is in line with those set out in Policy T6 of the London Plan for PTAL 3-6 and sets lower maximum standards in parts of PTAL 1 and PTAL 2 within the borough. While access to public transport is poorer at lower PTAL, it must be noted that PTAL is a relative, not an absolute scale. These parts of inner London still have good access to public transport and local services, which is reflected in car ownership levels that are similar to some well-connected areas in outer London. As such, these lower maximums are entirely appropriate.</p> <p>We also strongly support the borough’s expectation for car-free development. This will support the delivery the new homes that Londoners need while minimising the additional congestion, emissions and road danger generated by new developments. It will also enable the council to achieve their economic, social and environmental objectives set out in their Local Plan.</p>
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Policy T7 Parking	211	<p>We would welcome some clarity on the requirement to ‘avoid reliance on the public highway for parking needs’. As neither the London Plan nor the Lambeth Local Plan set minimum standards, we are not sure what parking ‘need’ is being referred to, if the policy is regarding general (i.e. not disabled persons) parking.</p> <p>However, in the case of residential disabled persons parking, there may be instances where, for example, identifying on-street spaces that could potentially be converted if demand were to arise, could make a better use of safeguarding limited space on constrained sites for this possible demand. We would encourage a more flexible approach if this is the current intention, within the council’s (welcomed) intention to manage demand for parking and allow more efficient use of kerbside. We believe it is reasonable to extend this approach to prioritising disabled persons parking over general parking.</p> <p>We appreciate the challenge of managing on-street parking stress, and welcome the council’s recognition that this necessitates adequate parking controls. If there are areas of particularly high stress that make accommodating growth more difficult, the council may wish to consider the example of Brighton and Hove council, who have capped the total number of permits issued in central CPZs, operating a waiting list for new residents. Lowering such a cap over time could also enable the council’s aim of allocating more space to efficient uses without requiring any individual to give up their existing access to on-street parking.</p>
Policy T7 Parking	211/212	<p>We note the council’s stated support for car clubs. Car clubs may have a role to play in supporting growth, particularly where they can help support parking provision below that set out in maximum standards. However, it is also important that car clubs are a genuine replacement for private ownership, and not creating new car trips in addition to those being made by people who already own their own vehicle. We would welcome a clearer link being established between the introduction of car clubs and measures to discourage or limit private ownership, such as the reallocation of on-street parking spaces or restricting the creation of new parking permits. In the context of new residential development specifically, as PTAL 4-6 should be car-free, we only support the introduction of new car club spaces in lieu of private parking in areas of PTAL 3 or lower within the borough.</p>

Policy T7 Parking	212	We support the principle of permit-free development as established by the policy, although there appears to be a potential inconsistency in the current policy wording. The policy appears to require permit-free where 'the development falls within an existing or planned controlled parking zone' (or the development involves the redevelopment of existing dwellings). However, paragraph 8.37 defines car-free development as both not providing on-site parking and being permit-free, and the policy applies the draft London Plan requirement for car-free at PTAL 4-6. We support this definition and would suggest that permit-free is required for all car-free residential development, with CPZs expanded as necessary to support this (in line with the borough's plans to consult on new CPZs and review existing CPZs).
Policy T7 Parking	212	Supporting text in paragraph 8.35 could be clarified by specifying where car-free development will be expected and reduce the scope for subjective inconsistency. Text could be amended to read: 'Lambeth will expect car-free development in most areas, with no general parking at all in <del>well-connected areas with excellent, very good or good public transport accessibility</del> (including those of PTAL 4,5 and 6) and limited parking elsewhere.' Please also note that PTAL refers to 'Public Transport Accessibility Levels', to distinguish it from physical/step-free accessibility.

Policy T8 Servicing	216	Text in Policy T8 (f) could be amended to read: 'Developers and their contractors will be expected to adhere to the Construction Logistics and Community Safety (CLOCS) standard, <b>and be registered through the Fleet Operator Recognition Scheme (FORS) or equivalent</b> '
Policy T8 Servicing	217	We strongly support the application of London Plan Policy T7 to promote sustainable freight and servicing. We also support measures to reduce negative impacts of freight and servicing vehicles, such as the promotion of off-peak deliveries, consolidation and distribution facilities, zero emission vehicles and active freight for last mile deliveries. However, text in Policy T9(i) could be improved to emphasise the use of active non-vehicular modes to read: 'Zero emission vehicles should be used for servicing wherever possible and consolidated deliveries are expected to be of this type. <b>Servicing by cycle and other non-vehicular modes should be used wherever possible.</b> Any on-street loading bay required for a development should be supplied with an electric vehicle rapid charge point to allow zero emissions vehicles to operate from the bay.'
Policy T8 Servicing	218	Supporting text in paragraph 8.46 could be improved by referring to the Direct Vision Standards (DVS). We understand that one star is the minimum from October 2020, but there is an opportunity to go further and require a DVS minimum of 2 stars for all new developments in Lambeth, reflecting the council's commitment to reducing road danger within the borough.

<p>Policy T9 Minicabs, taxis, private hire vehicle and ride hail services</p>	<p>219</p>	<p>It should be noted that minicabs, taxis and private hire vehicles are not considered to be sustainable travel modes, as the council have reflected in their modal hierarchy. However, while Policy T9 is caveated, the tone could be read as promoting these modes in their own right alongside public transport and active travel. Text in Policy T9 (a) could be amended to adopt a more balanced tone, such as the following:  ‘Proposals for minicab and private hire vehicle offices and taxi ranks will be <del>supported</del> <b>considered where appropriate</b> in town centres and other areas where they will meet a demonstrable transport need and where they demonstrate through a transport assessment that their operation would not adversely impact on traffic congestion, local parking supply, capacity or need, pedestrian movement or road safety.’</p> <p>It should also be noted that minicabs, taxis and PHVs are not included in the Mayor’s aim for 80 per cent of trips to be made by sustainable modes so any increase in their use will potentially undermine the achievement of the London-wide aim, but also Lambeth’s local aim.</p>
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<p>Policy Q13 Cycle Storage</p>	<p>284</p>	<p>We note that Policy Q13 b i) states that a reduction in unit numbers may be sought at small-scale flat conversions to accommodate suitable cycle storage provision, while part v) states the council will consider 'loss' of converting an on-street car parking bay where there is no viable alternative. However, it is not clear whether reducing unit numbers is a 'viable alternative' or whether this unit numbers may only be reduced after it has been demonstrated that cycle parking cannot be accommodated on-street. We would support the latter, as to do otherwise would prioritise maintaining parking over delivering additional new homes. There may also be scope to cater for existing residents without access to safe and convenient cycle parking in the vicinity when on-street cycle parking hangars are delivered. Furthermore, a reduction in on-street parking reduces vehicle dominance and is a significant part of delivering Healthy Streets that are more people focused (as opposed to being vehicle focused).</p> <p>Policy Q13 b(iv) sets out the circumstances in which the council will support cycle parking within a flat. However, it is not clear to what extent this approach is preferred to the others identified in the policy. The policy should also specify that any such storage space should be large enough to accommodate a full-sized bicycle.</p> <p>We strongly support Policy Q13 b(v) which states that developers should consider the loss of on – street parking bays to provide on-road cycle stores. We also strongly support Policy Q13 (c) which states that cycle storage needs to be being fully compliant with minimum standards set out in the London Plan and exceed these where a high demand for cycling is expected. However, we would also request that this policy refers to the LCDS, in addition to this policy.</p>
<p>Waterloo and South Bank – Transport and Public realm</p>	<p>334</p>	<p>Policy PNI is broadly in line with discussions that the council have had with TfL over a number of years, with development in this area contributing to greener, active and more sustainable travel.</p> <p>However, paragraph 11.12 states that 'Waterloo is forecast to see an overall increase in car trips due to projected growth in the area.' In practice, development in this area should be car-free and we do not expect it to have a significant impact on traffic levels in this area. However, if this text is retained, 'car trips' should be changed to 'vehicle trips' to more accurately reflect the likely growth in servicing, taxi and PHV movements rather than car movements.</p>

Site 5 – Elizabeth House, York Road, SE1	345	A requirement for this site to provide step-free access to the Bakerloo (northbound) and Northern line platforms should be included. A new bullet point under Design Principles and Key development considerations should therefore be added to read: <b>‘Facilitates step-free access improvements to Waterloo station’</b>
Site 9 – ITV Centre and Gabriel’s Wharf, Upper Ground SE1	356	Reference to the Garden Bridge should be removed in part (viii) in the Design principles and key development considerations section, as this scheme is no longer going ahead.
Vauxhall	357 / 360 / 365	Please amend the opening date for the Northern line extension from 2020 to Autumn 2021 in Paragraph 11.18 and 11.31.  We would urge some caution with regards to the reference in Policy PN2 (i) to investigate whether the one-way system at Kennington Lane/Durham Street/Harleyford Road can be replaced with a two-way system, and to promote walking, cycling and public realm improvements on Albert Embankment and along the viaduct linking Vauxhall to Waterloo as part of the Low Line project. An option of changing the Durham St triangle to a two-way system was previously looked at as part of ongoing works at Vauxhall Cross, but was not well received during local consultation. If further work was to be carried out on this option, we would want to prevent any negative impacts on the design of the Vauxhall Cross scheme.
Site 13: Vauxhall Island Site	376	The boundary of Vauxhall Island Site is incorrect in the map for Site 13 as it includes the bus station area. This should be corrected to depict the correct site area as this might raise issues that were previously addressed about the links between the bus station and developer.

Brixton	390	<p>Policy PN3 (o) references that the council would like to improve connections between Brixton’s mainline and London Underground stations. We would welcome hearing more from the council to understand how these aspirations will be achieved, taking into account how increased demand may impact station and Victoria line capacity.</p> <p>Policy PN3 (p) states the council’s aspirations to reopen the rear entrance to Brixton London Underground station. However, we are not sure what entrance Lambeth are referring to. We would welcome clarity on this point and further discussion if the council wish to retain this aspiration.</p> <p>Numerous references are also made to a potential cycle lane between Atlantic Road and Electric Lane but this scheme has made limited progress to date and we would encourage the council to further engage with us on to discuss this scheme and its proposed location in more detail.</p> <p>Policy PN3 (r) references the delivery of the Streatham to Oval cycle way through the town centre. While we welcome the aspiration, as the council are aware, this is a large, complex scheme and is subject to approvals, so it may be beneficial to nuance the text here.</p> <p>The map for Site 16 should also position Brixton Underground Station on the south side of Atlantic Rd, closer to the A23.</p>
Clapham	417	<p>We welcome references made in Policy PN5(h) to the council working with TfL to reduce road danger on Clapham High Street and Wandsworth Road and improving the quality and safety of Cycleway 7, which are both scheme consideration.</p>
Stockwell	423	<p>Policy PN6 (e) mentions introducing measures that will reduce the severance caused by Clapham Road in the area. We are keen to work with the council more widely to reduce road severance and to identify proposals in this area that can achieve this.</p>

West Norwood/Tulse Hill	430	Policy PN7 (c) suggests that delivering two-way working will reduce traffic dominance caused by Tulse Hill gyratory. We are aware that this particular option is an aspiration of the borough, however we believe that other options to improve safety, cycling, walking and buses should also be considered, and we would like to work with the council to identify the most feasible and effective option. We therefore suggest that this policy focuses on the wider benefits that the scheme is aiming to deliver, rather than referring to 'two-way working' specifically.
Kennington / Oval	437	<p>Please amend the opening date for the Northern line extension from 2020 to Autumn 2021 in Paragraph 11.19.</p> <p>The Kennington/Oval section mentions that Lambeth will support TfL with the delivery of planned routes on the A23 linking to Brixton and the A202 linking to Camberwell as part of the potential alignment of CFR14. However, this scheme has yet to be confirmed, therefore the wording should reflect that these routes are supported, albeit 'potential'.</p>
Loughborough Junction – Transport and Public Realm	448	<p>We support the aspiration to improve walking and cycling links in the area and to improve the accessibility of this area. Text could be added at the end of paragraph 11.143 to read:  'Expansion of London Cycle Hire will be explored with TfL, to be funded by new developments in the form of developer contributions.'</p> <p>However, we urge greater caution around the promotion of the use of car clubs in this area (which is PTAL 5) unless they are more directly linked to measures that discourage private ownership, for example an overall reduction of on-street spaces alongside the introduction of a (smaller) number of car club spaces and permit restrictions for new residents.</p>
PN11 Upper Norwood / Crystal Palace	460	As previously mentioned, TfL is not actively progressing the Tram extension to Upper Norwood/Crystal Palace as it is unlikely to be good value for money. Reference to a Tram extension should therefore be removed from the policy text and scheme map, as this scheme is unlikely to be developed.