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13 March 2020

Lambeth Planning  
PO Box 734  
Winchester  
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Dear Sir / Madam

**Lambeth Local Plan Review Regulation 19; Network Rail Consultation Response**

I write in respect of the above consultation on the review of the submission version of the Local Plan. Having considered the details of the consultation I can confirm that previous comments made in response to the consultation in 2018 still stand. Network Rail do not have new comments to make over and above this.

*Railway Arches*

It is noted that since that consultation, the Railway Arches have been sold to The Arch Company Properties LP ("The Arch Company"). Network Rail, as freeholder for the Arches supports the response to the Regulation 19 consultation made by The Arch Company.

*Key Industrial Business Area Designation: Knolly's Yard*

Within the initial Local Plan Review, London Borough of Lambeth identified the site as suitable for a KIBA. Representations were made by Network Rail and our Development Partner Ecoworld (formerly Be) demonstrating that not only were KIBA uses not viable on this site, but the access and surrounding road infrastructure were not compatible with KIBA uses. This was reiterated in the following consultation and is again noted here.

Thank you again for providing Network Rail with the opportunity to comment on this consultation. I trust that the comments above are clear, but if you require any further information or have any queries do not hesitate to contact me.

Yours sincerely

**Anna Woodward**  
Town Planner

**Attached:** Previous Network Rail response 17/12/2018



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17<sup>th</sup> December 2018

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Dear Sir / Madam

**Lambeth Transport Strategy and Lambeth Local Plan Review; Network Rail Consultation Response**

I write in respect of the above consultation on your review of your Local Plan. Having considered the details of the consultation I can confirm that Network Rail wishes to make the following comments.

**Lambeth Transport Strategy**

Network Rail acknowledges the projected growth in population and employment in Lambeth, particularly in Waterloo and Vauxhall, and clearly the rail infrastructure plays a key role in ensuring Good Growth.

The maintenance, enhancement and development of railway infrastructure is key to the success of Lambeth, particularly in providing people with access to their homes, work and leisure, and ensuring growth is good growth.

It is therefore surprising that there is not one reference to Network Rail in the draft Strategy. It is considered extremely important that Network Rail is referenced in the document, with information on our objectives and responsibilities.

London is the hub for the national network, with 75% of rail journeys starting or ending in London and the South East. 85% of Londoners use the rail network and 43% of all journeys into central London are either wholly or partly by rail.

As such it has a key role in meeting the objectives set out in the new Lambeth Transport Strategy and Lambeth Local Plan, and your growth strategies. Similarly, to the London Plan, the new Lambeth Transport Strategy needs to 'think big about infrastructure' and aim to develop a common strategic investment programme for the delivery of the necessary infrastructure requirements for the Borough. This is vital to the development and coordination of all of London's infrastructure needs.

## Transport in Lambeth (Challenges)

‘Need for radical overhaul of rail services in South London’

Network Rail recognise the inclusion of the above statement as one of Lambeth’s key challenges, our strategic plans for the railway (as indicated in our Route Studies covering South London) demonstrate the need for investment in capacity and capability to accommodate long-term growth. Network Rail, as the infrastructure manager, is a key partner to realising aspirations of TfL, Lambeth, the GLA, and central Government.

Network Rail are also the System Operator. South London’s rail routes serve the inner London Boroughs as well as outer London, and the wider South-East region. As such, aspirations and new investments in the railway should be assessed and considered with regard to this wider systemic context. Whilst we are happy to engage on facilitating new services or investments in infrastructure, proposals will need to be appraised objectively to the costs/ benefits to users of the whole rail system.

## Accessibility to the rail network

Network Rail is a long-term partner of the Government’s Access for All programme and has delivered significant volumes of accessibility investments nationally and within London. Network Rail, through its System Operator and Business Development teams, would welcome further engagement with Lambeth and TfL on accessibility.

## Devolution of rail services

As Network Rail is the Infrastructure Manager of the rail network in Great Britain, we do not currently hold an organisational view on whether rail service operations should be further devolved. The decision to devolve rail services lies with the Department for Transport.

## ‘Metroisation’

Network Rail recognises the need to plan and develop the rail network in South London, so that capacity and capability can be provided for long-term growth in demand both within the Capital and the wider South-East. System Operator, the division within Network Rail responsible for the long-term planning of the network and its services, is engaging with TfL on their aspirations for Metroisation and it is noted within their long-term planning documentation (please refer to Network Rail’s Kent Area Route Study, 2018, and the Sussex Area Route Study, 2015).

The complexity of the rail network in South London means that passengers from suburban stations may have choice of services to multiple London terminals, albeit at lower frequencies to each. Whilst we welcome in principle the aim to increase frequency and capacity on these networks, proposals and planning for new services and interventions must be appraised on an individual basis noting that Metroisation may present disbenefits to certain groups of passengers over others. As such, further development of the concept should explore and understand trade-offs within the context of the wider rail system.

## Lambeth’s Priority Actions

Network Rail, through its System Operator and Business Development teams, would welcome further discussion with Lambeth in relation to the following rail infrastructure opportunities identified within the Transport Strategy’s Priority Actions; a new Streatham Common Interchange, Overground Interchange at Loughborough Jn and refurbishment of Brixton Station.

In relation to Lambeth’s aspirations for additional services from Chapham High Street and Wandsworth Road, these stations are situated on the South London Line and the approach to Victoria of the Chatham Mainline. The challenge here is to consider new services or stops within the wider social and physical geography served by this rail route. Any proposals need

to objectively assess costs / benefits to stopping additional services within a complex and busy section of the network. Network Rail would welcome further engagement with Lambeth on this.

The new Lambeth Transport Strategy and Local Plan should support the aims of the direction of new draft London Plan. Indeed, the successful future development of London's railway will be crucial to deliver the existing London Plan commitments, as well as those discussed in your evidence base documents that will inform your new Plan. The document should acknowledge the need to improve the linkages and partnerships with the regions and sub -regions, enhance the economic development of both inner and outer London and further develop the capital's opportunity and intensification areas, specifically including the focus in and around stations. The document must make clear that investment in transport infrastructure is inextricably linked to unlocking new growth opportunities in London.

## **Lambeth Local Plan Review**

### **Transport**

This consultation response has already provided feedback covering several points raised within Policy T4 Public transport infrastructure. Please see further comments below which provide additional details in response to points raised within Policy T4 and the wider Draft Revised Local Plan:

- Policy PN3 Brixton, Part g) - As explained earlier within this consultation response, when considering additional stops, the challenge here is to consider new services or stops within the wider social and physical geography served by this rail route. Any proposals need to objectively assess costs / benefits to stopping additional services within a complex and busy section of the network. Network Rail would welcome further engagement with Lambeth on this.
- D. Providing essential infrastructure (8) - Network Rail welcome recognition from Lambeth to work in partnership to increase public transport capacity and accessibility.
- 8.25 - It is important to consider these rail networks regionally and that they serve multiple markets. Any changes to service would need to be objectively assessed through costs / benefits to all users of the whole rail system.
- Site 16 (Brixton Central) - Network Rail would welcome engagement on development opportunities at Brixton Central. The station is one of Network Rail's priorities for pedestrian capacity interventions. Network Rail are eager to discuss the plans and proposals for a new station entrance and pedestrian links to inform productive development.
- 11.101 - Additional stops at Clapham High Street for Victoria bound services would face challenges to implement. The station is on a busy and mixed-use approach to Victoria, which is a critical location for City-wide and South-East regional rail capacity and performance. Any service change here or alteration of the timetable would have to be considered objectively in terms of the benefits / costs of all rail users. Please note that the Crossrail 2 proposal, although serving stations further South-west, has a core aim to relieve pressure on the Northern Line.
- Paragraph 2.37 - Please note that Southern & Thameslink are business units of the same franchise.
- Paragraph 11.95 (Streatham Hill and Streatham Common stations) - Network Rail, alongside Southern / GTR, welcome engagement with Lambeth on the subject of accessibility at Streatham Hill and Common stations.

- 11.171 (new Overground Station in Loughborough Junction) - Engagement with Network Rail is critical to gauging feasibility of a new station at this location. The new station would be proposed on the busy and mixed-use South London Line, a number of physical and timetable-based constraints would need to be considered as part of any future analysis.
- Policy PN7 West Norwood v) Tulse Hill Station - Network Rail welcome engagement with Lambeth on aspirations to refurbish the station. Network Rail's Route Business Development and Southern/ GTR should be contacted in order to begin discussion on Tulse Hill Station.

## **Funding of Infrastructure**

The financing of railway infrastructure is vital, and whilst Network Rail is funded to provide all the necessary maintenance and improvements to its infrastructure, it is not funded to carry out enhancements and developments over and above what is required for the safe and efficient operation of the railway. It is therefore necessary to seek alternative funding sources, and we are calling on Lambeth to invest revenue from the planning system to improve London's railway. In this context, we would very much welcome the commitment in the new Lambeth Plan to support the Mayor's transport priorities and seek third party funding contributions to the railway. The intensification of development around stations must fund both mitigation and enhancement of the stations and supporting infrastructure.

The Plan should also specifically acknowledge the vital role played by Network Rail in increasing the capacity of London's railway and, particularly, re-developing many of its major stations to meet the needs of a growing population. Network Rail therefore recommends that a specific commitment to support the comprehensive redevelopment of London's stations be included in the new Plan, as well as an acknowledgement that financial support through the planning charges regime and commercial development is required to facilitate these station improvements.

## **Intensification of Development**

Network Rail welcome the Mayor's intent through his direction of travel document and the Draft London Plan to meet as much of the city's growth demands within London through higher density developments, which are situated in highly accessible locations, well served by existing or planned transport interchanges.

All stations within London provide an opportunity for sustainable development, including (but not limited to) residential intensification, providing Londoners and Lambeth residents with a clear opportunity to live close to public transport nodes. Whilst all stations provide this opportunity there are clearly a number in Lambeth where significant development can take place – creating both the homes that are needed whilst providing the significant funding required to contribute to the expansion of the rail network that is central to the continuing success of the capital as a world city. Such priority locations are clearly Waterloo, Vauxhall and Brixton, but also Streatham and Clapham where there now exists an opportunity for major high density development and station improvements.

However, as stated above, rail investment, such as transforming stations, can drive regeneration. But public funding can no longer be relied upon to provide this. Therefore, it is clear that there is a need to increasingly source funding from those people, authorities and businesses that directly benefit from better railways.

It is clear therefore that policies in relation to the delivery of housing, creation of employment, unlocking the potential of public land, and the optimisation of strategic development opportunities at key transport nodes will be vital to Lambeth's growth and the success of a new Lambeth Plan.

## Housing

As you are aware, Network Rail has recently announced plans to release land for the development of around 12,000 new homes as part of its contribution towards the Government's target to release land with the potential for 160,000 homes.

Nearly 200 sites across the country have been identified as suitable housing development opportunities for around 12,000 new homes. It is anticipated that land for around 5,000 of these homes will be delivered in London. The land-release programme is central to Network Rail's objectives to help respond to the nation's housing shortage.

The delivery of these sites is far from easy, and in order to realise full development potential Network Rail requires the assistance and support of your Authority and other organisations such as the Greater London Authority and Transport for London.

Many sites have difficult constraints and abnormal costs that are associated with developing on railway land or on/over railway assets, and it is therefore requested that the new Plan acknowledges both the potential that these sites can bring, but also the costs associated with delivering them. Therefore, it is requested that a flexible approach is adopted when considering the development of railway land and assets to recognise the constraints they possess.

Furthermore, it is important that the work that was carried out by the GLA and London Land Commission (LLC) in respect of the development of public land is not lost nor seen as finished. It is vitally important work continues with public bodies to assist in the delivery of the identified sites. A prime example of this is the site at Knolly's Yard, Tulse Hill. This is further discussed below.

Network Rail would welcome an opportunity to discuss the potential strategic opportunities further with you throughout the preparation of the new Plan and is happy to assist with the collation of relevant evidence and information to support your growth strategies and identified development opportunities.

### Detailed comments

#### Railway Arches

Network Rail owns and manages a significant number of railway arches within the borough of Lambeth, and has significantly invested in areas such as Brixton and Herne Hill. It is acknowledged that the railway arches, which form a spine running through the borough, provide a mixed contribution to the area. It is evident that the railway viaduct can act as both a visual and physical barrier to permeability. However, that said, the arches within the viaduct provide employment space for a wide variety of tenants throughout Lambeth.

Furthermore, in respect of railway arches within industrial areas, it is considered that provision should be allowed for flexibility in the use, providing that the proposed use does not impact negatively on the Industrial nature of the designated area. It is our experience that arches within industrial locations can provide complimentary alternative uses which can support the other businesses in the area.

Therefore, it is considered that the new Plan should include support to allow for a mix of uses which are suitable and appropriate to the specific locations, and should not be restrictive in terms of uses nor occupiers.

Network Rail is concerned that the draft Policy ED6 Railway Arches is currently too restrictive in relation to potential changes of use of arch units located outside of London Plan Opportunity Areas and major, district and local centres.

Part b) of the Policy states that *'Change of use of railway arches from commercial B2, B8, B1 and appropriate sui generis uses will not be permitted.'* Network Rail considers that is a broad-brush approach and could restrict appropriate uses and investment coming forward within these locations.

Network Rail acknowledges points set out in part d) of the Policy, however, due consideration will need to be given so that they do not have a detrimental impact on the viability and feasibility of schemes.

#### Loughborough Junction Town Centre Extension

Network Rail confirms its support for the proposed extension to the Loughborough Junction Local Centre and Policy PN10 Loughborough Junction. It is considered that the proposed extension will support the principles of the draft Loughborough Junction Action Plan. Specifically the inclusion of Rathgar Road into the town centre will assist in providing additional and a unique space for additional town centre uses in a small cluster away from the main Coldharbour Lane centre. This will also support a new route through one of the arches to improve links from Loughborough Estate to the rail station.

In relation to Part g) i), Network Rail requests that greater flexibility is considered in terms of the amount of A class uses that could be facilitated within the Rathgar Road railway arches.

#### Waterloo

Waterloo Station is a key transport hub linking much of the south and south east of England with Central London. The station, which also includes Waterloo Underground Station, is the busiest by passenger numbers in the United Kingdom. Waterloo Station has recently undergone alterations as part of a desire to improve passenger facilities and amenities at the station. It is envisaged that further major works will be required in the future to address the operational needs of the network and the needs of the passengers.

Network Rail requests that a flexible approach is set out to development at the station as it may be necessary to make significant changes to the station in order to deliver the much needed capacity and interchange improvements.

Furthermore, Network Rail specifically requests that the new Plan acknowledges the need for Developers of sites near to Waterloo Station to contribute to both mitigation of any impacts as a result of their developments, but also to contribute to improvements to the station and interchange. This can be delivered through S106 Agreements and Community Infrastructure Levy, but must be supported by appropriate policy.

For example, the development opportunity offered by Elizabeth House is significant, but it is essential that the development acknowledges its impact and relationship with the station and therefore must respond accordingly through mitigation works and financial contributions. It is hoped to continue discussions on the site with you and the new Developer in order to ensure that any issues are properly considered and addressed.

#### Key Industrial Business Area Designation: Knolly's Yard

Within the initial Local Plan Review, LB Lambeth identified the site as suitable for a KIBA. Representations were made by Network Rail and our Development Partner Ecoworld (formerly Be) demonstrating that not only were KIBA uses not viable on this site, but the access and surrounding road infrastructure were not compatible with KIBA uses.

The Draft Revised Local Plan continues to propose this site as being suitable for KIBA uses notwithstanding the evidence that was put forward during the first round of consultation. Network Rail therefore further objects to KIBA uses on the site, and requests that the site is not designated as a KIBA, allowing an appropriate quantum and type of employment use to come forward which is appropriate for this site.

Network Rail's Development Partner Ecoworld have submitted a separate response to the Draft Revised Local Plan. Ecoworld's representation demonstrates that the KIBA designation (even with co-location) would be too restrictive for the site and would stop it from coming forward for development. Please refer to Ecoworld's consultation representation for further details in relation to the Knolly's Yard site, including; relevant London Plan Policies, the site and surrounding area, Viability, Land use criteria, Economic criteria and Demand based criteria.

Designation of this site as a KIBA would not accord with London Plan policies and guidance, and would not have the effect of protecting existing uses on the site and local jobs. The effect would be to sterilise the site and prevent important planning and community objectives being met, including the replacement of jobs on the site.

An opportunity to have a mixed-use on the site (something which KIBA designation would not support) would create the value required to unlock the site and meet objectives for creating new jobs in Tulse Hill, Lambeth; the delivery of a range of housing tenures (affordable rent and intermediate affordable housing, private rent) to meet acute needs in the Borough; and the environmental enhancement that this neglected, back land site so badly needs.

Whilst Network Rail does not view this site as being appropriate as a KIBA allocation, it would welcome the opportunity to work with Lambeth Council during its Local Plan Review, including identifying other sites that may potentially be suitable for long term industrial use.

Thank you again for providing Network Rail with the opportunity to comment on this consultation. I trust that the comments above are clear, but if you require any further information or have any queries do not hesitate to contact me.

Yours sincerely

**Elliot Stamp**  
Town Planner