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28/02/2022

Dear Sir/Madam,

Consultation on the Publication version of the Wandsworth Local Plan

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 do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL CD Planning (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 the publication version of the Wandsworth Local Plan. We welcome the positive changes that you have made to the Local Plan to take account of our response to the pre-publication (Reg. 18) version. This response provides an updated set of comments reflecting the changes made to the Local Plan.

The London Plan was published in March 2021 and now forms part of Wandsworth's Development Plan. Local Plan policies and site allocations should be developed in line with relevant London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

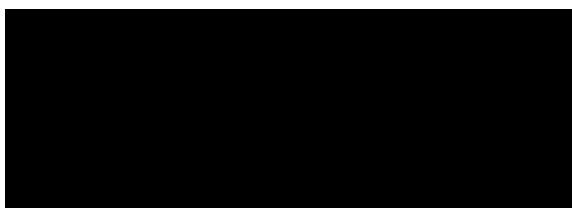
In this context we welcome application of Placemaking, Smart Growth and People First principles in developing the Area Strategies, in particular, the need to manage traffic and provide good public transport connectivity, support active travel and work towards the 15-minute neighbourhood. We welcome added references to the Vision Zero road safety objective. However, as stated previously, the Plan should include policies and measures to ensure that all development contributes towards achieving the mode split targets set in the Mayor's Transport Strategy and Wandsworth's Local Implementation Plan. The mode split target of 82 per cent of trips to be made by public transport or active travel by 2041 could be made more prominent by including it in policy LP49.

We welcome clarification that car free residential development will be required in areas of PTAL 4 or above, although it would be helpful to confirm that this extends to all parts of the Clapham Junction and Vauxhall, Nine Elms and Battersea Opportunity Areas to ensure conformity with London Plan T6.1. The new paragraph, suggesting that there may be amended parking standards for key workers is not considered to be evidence-based, and is not consistent with London Plan parking policies so should be removed.

We welcome the strong emphasis on applying the Healthy Streets Approach and the positive approach to encouraging active travel. We also welcome strong policies on safeguarding and retaining transport land including specific sites and support for improved bus services and infrastructure including waiting facilities and stands.

Our comments on specific modifications and suggestions for amendments or wording improvements are detailed in appendix A below. Alongside our response to the Reg. 18 consultation, updates have been provided which take into account changes to the Reg. 19 version of the Local Plan.

Yours faithfully,



Josephine Vos | Manager
London Plan and Planning Obligations team | City Planning

Email: 



Appendix A: Specific suggested edits and comments from TfL on the Draft Wandsworth Local Plan

Section		Track change/comment – Reg. 18	Reg. 19 update
Wandsworth	PM2	<p>TfL welcomes the strong support given in the accompanying text to the Wandsworth gyratory project and we look forward to continuing to work with the borough to secure its delivery. The date for implementation should be updated to 2025. To reinforce the importance of the gyratory to place-making, a general requirement for developments in the area to provide funding, land or complementary measures towards the project should be clearly stated in Policy PM2.</p> <p>A few sites in the sub-area are identified as being suitable for car free development which is welcomed. However, TfL would want to see car free development encouraged more widely. All sites in Wandsworth sub-area that have a PTAL of 4 or above should be car free and on all other sites parking should be minimised. For clarity, this approach should be included in policy PM2.</p> <p>We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p> <p>TfL would not want any new vehicle access or servicing from roads which forms part of the TLRN. Where possible existing access points direct from the TLRN should be rationalised or closed when sites are redeveloped.</p>	<p>We welcome confirmation that ‘Development in the area of the Wandsworth Gyratory will be required to provide funding, land or complementary measures to support the implementation and maximise the benefits of the project.’</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
WT1	TfL welcomes the reference to land being required for the Wandsworth gyratory scheme. In the uses section the wording should be corrected to read: ‘A section of the western and northern part of this site is required...’ The land in question should be excluded from any built form and secured at nil cost to TfL as part of any relevant planning permissions on the site.	The implementation date of the gyratory scheme should be updated to 2025 in paragraph 4.19. We welcome the amended wording in paragraph 4.20.
WT2	TfL welcomes the reference to land being required for the Wandsworth gyratory scheme and that this has been included in planning permission reference: 2012/5286. If any revised applications are submitted for the site, the land required for the gyratory should be secured at nil cost to TfL.	
WT4	TfL welcomes the reference to land being required for the Wandsworth gyratory scheme and that development should not prejudice its delivery. The land in question should be excluded from any built form and secured at nil cost to TfL as part of any relevant planning permissions on the site. Any access for vehicles and servicing should be from Smugglers Way. TfL welcomes the requirement for the site to be car free.	Paragraph 4.40 should state that vehicle access and servicing should be from Smugglers Way rather than Armoury Way.
WT3/ WT5/ WT6/ WT7	TfL would like to see a requirement for all of these sites to be car free.	
WT8	TfL would like to see a requirement for the site to be car free. TfL welcomes the requirement for contributions towards improved public transport. The design and location of the proposed pedestrian crossing of Swandon Way should be discussed with TfL at the earliest opportunity.	

Section	Track change/comment – Reg. 18	Reg. 19 update
WT9/ WT1 0	TfL welcomes the requirement that continued operation of the safeguarded wharf should not be prejudiced by development. TfL would also support a requirement for contributions to improve public transport and facilities for active travel.	
WT1 2/WT 13	TfL welcomes the requirement for modelling to assess the impact on the TLRN and the requirement for public transport improvements. The most effective means to limit impacts on the road network is to require car free development for any revised planning applications, and TfL would like to see this included in the site allocations.	
WT1 4/WT 15/W T17	TfL supports the requirement for all three sites to be car free. WT17 contains an operational bus garage. Although it does not provide services for the TfL network, it is still an operational transport use and so the provisions of T3 in the London Plan on safeguarding and retaining land in transport use would still apply. We welcome the requirement that continued operation of the safeguarded wharf should not be prejudiced by development.	
WT1 6	TfL supports the requirement that parts of the site may be required for highways and/or access improvements and that improvements to public transport would be required. As stated, there will need to be early engagement with TfL and account taken of the proposals for the gyratory. Improvements to walking and cycling access will be essential but the form these take should be flexible to take account of the proposed development and its relationship to other sites.	
WT1 8	TfL would like to see a requirement for the site to be car free.	
WT1 9	TfL would like to see a requirement for the site to be car free and welcomes the recommendation that on-site car parking should be removed.	

Section		Track change/comment – Reg. 18	Reg. 19 update
	WT2 0	TfL would like to see a requirement for the any additional development to be car free and for existing car parking on-site to be reduced.	
	WT2 1	TfL welcomes the suggestion that the number of access points should be rationalised and reduced. We would like to see a requirement for the site to be car free.	

Section		Track change/comment – Reg. 18	Reg. 19 update
Nine Elms	PM3	<p>TfL agrees with the statement in 5.11 that the area provides good potential for car free living. The presumption should be that all development will be car free and this should be clearly stated in policy PM3.</p> <p>TfL supports the Council’s intention to improve connectivity and permeability for pedestrians, cyclists and public transport users. We welcome the requirement for developments to contribute towards this objective including funding and/or infrastructure to help to deliver the Nine Elms Cycling Strategy and specific projects such as the Nine Elms Lane/Battersea Park Road scheme.</p> <p>The proposal for a Nine Elms – Pimlico bridge is subject to further discussion with Westminster City Council before it can be progressed. TfL can provide technical advice and support but there is no commitment or funding at the present time.</p> <p>Plans for improved connections between Battersea Park and Queenstown Road stations are welcomed. Although there are no current plans to provide an all-day London Overground service to Battersea Park station, passive provision should be considered in any redevelopment.</p> <p>We welcome the proposals for urban logistics hubs particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p> <p>The loss of a 24-hour coach facility on the New Covent Garden Market site has caused difficulties for operators coming to London with night stops. The limited daytime parking which remains is used by commuter coaches and private hire coaches (some of which could be working on behalf of scheduled coach operators). Any further reduction in parking for coaches must be carefully considered as it will potentially have a detrimental impact. There may be a need to protect existing facilities and consideration given to enhancing coach parking provision (see comments on sites NE6/NE7/NE8). This will require a strategy for the medium and long term.</p>	<p>References to the Northern line extension should be updated to reflect its opening in September 2021. Although references to car free development for site allocations have been removed, LP51 must include a requirement for car free development within Opportunity Areas including Vauxhall, Nine Elms and Battersea as well as areas of PTAL 4 and above to ensure conformity with London Plan Policy T6.1 (see comment under LP51 below).</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
NE1/ NE3/ NE5/ NE9/ NE11	TfL would like to see a requirement for these sites to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	
NE2	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	
NE4	TfL would like to see a requirement for this site to be car free. Existing parking on the site should be removed, thus making better use of land and encouraging mode shift.	

Section	Track change/comment – Reg. 18	Reg. 19 update
NE6/ NE7/ NE8	<p>TfL strongly supports the requirement to retain and protect Battersea bus garage. The site is operated by Abellio and has a capacity of 245 vehicles, which provide TfL bus services. It is in an ideal location on designated Strategic Industrial Land and, as it is not surrounded by residential development, there are no issues relating to the unsocial operating hours. The garage has good access to strategic roads which is vital for the operation of a reliable and cost-effective bus network and public transport, which supports staff to get to and from work. The garage is a significant employer in the area. For every one bus, generally three to four people are employed including bus drivers, engineers, cleaners and garage staff. The garage is required now and in the foreseeable future. If surrounding sites are redeveloped, our strong preference would be for it to stay where it is. If it were to be moved, it would need to be in the immediate vicinity. If the site were to be redeveloped or relocated, capacity must be maintained or increased. On top of additional capacity for future growth, the move to a zero-emission bus fleet means that capacity will be lost on site. As such, we would expect current capacity plus an additional 20 per cent capacity for growth, and to accommodate the electrification of the fleet.</p> <p>Any proposals affecting the bus depot, such as mixed-use redevelopment incorporating bus garage facilities or finding alternative sites will need to ensure that capacity, operational efficiency and flexibility are maintained and enhanced, and that continuity of operation is secured.</p> <p>Battersea bus garage also provides parking facilities for National Express coaches between scheduled services. Some of these coaches have been displaced by the closure of the 24-hour facility at New Covent Garden Market. Layover facilities for coaches continue to be required and London Plan policy T3 should be followed if any changes are proposed.</p> <p>We welcome support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal or along Queenstown Road.</p>	<p>We reiterate our support for the requirement to retain and protect Battersea bus garage.</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
NE10	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	
NE12	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	
NE13	TfL would like to see a requirement for this site to be car free. We welcome the support for enhanced bus journey times especially on Battersea Park Road-Nine Elms Lane and Queenstown Road corridors, and the requirement for developments to provide road space and financial contributions towards delivery of the Nine Elms Corridor proposal.	

Section		Track change/comment – Reg. 18	Reg. 19 update
Clapham Junction	PM4	<p>As an Opportunity Area, all residential and office development should be car free. This should be clearly expressed in policy PM4 and emphasised in all site allocations within the Opportunity Area.</p> <p>We welcome the commitment to work with Network Rail and TfL to deliver improvements in and around Clapham Junction station, and the intention to improve connectivity and permeability for pedestrians and cyclists and provide additional cycle parking.</p> <p>We also welcome the references in individual site allocations to Crossrail safeguarding and works sites. The plan on Page 119 refers to the Safeguarded Crossrail 2 area which should clarify that this is the 2015 Direction. However, the Area of Surface Interest is not shown on the plan. It is more clearly shown in the plan on page 120. In new Directions expected later this year, it is anticipated that the areas for Crossrail 2 Safeguarding will change. Sites CJ3 and CJ4 appear to be have been transposed on both plans.</p> <p>We welcome the intention to reduce the impact of through traffic in and around the town centre through traffic management, to create more space for pedestrians and better waiting areas for bus passengers, and the requirement for development proposals to contribute towards connectivity and public realm improvements.</p> <p>We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.</p>	<p>Although references to car free development for site allocations have been removed, LP5I must include a requirement for car free development within Opportunity Areas including Clapham Junction as well as areas of PTAL 4 and above to ensure conformity with London Plan Policy T6.1 (see comment under LP5I below). We welcome changes to the plans to amend references to Crossrail safeguarding.</p>

Section		Track change/comment – Reg. 18	Reg. 19 update
	CJ1	Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free. We welcome the intention to seek public transport contributions to improve infrastructure and services.	
	CJ2	Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free. TfL welcomes references to Crossrail 2. A project update is provided above. TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options. We welcome the intention to work with Network Rail and TfL to secure suitable stopping facilities for buses and taxis, bus standing facilities and adequate cycle parking close to the station entrance.	

Section	Track change/comment – Reg. 18	Reg. 19 update
CJ3	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free. TfL welcomes references to Crossrail 2 works sites. A project update is provided above. TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options. The requirement for engagement should be with TfL rather than the bus operator because services are provided by a range of operators under contract to TfL, which is responsible for all bus infrastructure. We would want to ensure that any redevelopment proposals enhance bus passenger and standing facilities, improve operational efficiency and provide for future expansion.</p>	<p>We welcome the references to engagement with TfL.</p>
CJ4	<p>Taking account of the high PTAL and town centre location within the Clapham Junction Opportunity Area, any redevelopment of this site should be car free. TfL welcomes references to Crossrail 2 works sites. However, it is not clear what is meant by the site being within a '200 metre buffer'. A project update is provided above. TfL has continued to work with Network Rail, the London Borough of Wandsworth and the Winstanley and York Road Regeneration team to develop proposals for Crossrail 2 that are compatible with future potential regeneration options.</p>	<p>We welcome changes to the Crossrail 2 references.</p>

Section		Track change/comment – Reg. 18	Reg. 19 update
	CJ5	Those parts of the site that fall within the Opportunity Area or have a high PTAL should be car free. Bus standing and turning facilities should be retained and improved as part of any redevelopment and contributions provided towards implementation of the York Road Corridor Study.	We would welcome specific reference to retention of bus standing and turning and implementing the York Road Corridor Study.
Putney	PM5	Given the high PTAL, opportunities for active travel and its designation as an Air Quality Focus Area, all residential and office development should be car free. This should be clearly expressed in policy PM5 and emphasised in all site allocations. We welcome the proposals for urban logistics hubs, particularly where they minimise vehicle use for last mile deliveries. However, electric vans will not reduce congestion and so encouragement should be given to the use of alternatives such as cargo bikes where possible.	We welcome the support for repurposing of Putney Exchange car park for meanwhile leisure, retail, creative and cultural uses. We also welcome proposals to improve access for pedestrians and cyclists including at crossings and to prioritise buses over other motor vehicles to enhance bus journey times. We encourage early dialogue with TfL to discuss potential measures affecting Upper Richmond Road which forms part of the TLRN and measures that are designed to provide greater bus priority. Any proposals affecting the taxi rank should be discussed with TfL Taxis and Private Hire.

Section		Track change/comment – Reg. 18	Reg. 19 update
	PUT1	<p>TfL welcomes the proposal for the site to provide much needed bus terminating and standing facilities (which should include drivers’ facilities as part of any redevelopment). Early dialogue with TfL is advised to ensure that any provision meets operational needs.</p> <p>However, the suggested provision of car parking is not justified because the area is already congested, with high levels of pollutants generated by traffic. Parking would take up additional, valuable development space and there are other parking alternatives nearby. Any development should be car free to take advantage of the high PTAL and the opportunities for active travel. In this context, local cycle route improvements would be welcomed.</p>	<p>We reiterate support for providing bus terminating and standing including drivers’ facilities and concern that car parking is not justified in an area with high PTAL</p>
	PUT2 /PUT 3/ PUT4 /PUT 5/ PUT6	<p>Any development on these sites should be car free and existing parking should not be replaced to take advantage of the high PTAL and the opportunities for active travel.</p>	<p>We reiterate the point about existing parking not being replaced as part of any redevelopment to ensure conformity with London Plan Policy T6L</p>

Section		Track change/comment – Reg. 18	Reg. 19 update
Tooting	PM6	<p>Given the high PTAL, opportunities for active travel and its designation as an Air Quality Focus Area, all residential and office development should be car free. This should be clearly expressed in policy PM6 and emphasised in all site allocations.</p> <p>TfL welcomes measures to improve bus speeds and bus standing facilities as well as improvements to Cycle Superhighway 7 and other cycle lanes.</p> <p>Widened pavements and traffic management measures to reduce the dominance of cars and improve opportunities for active travel are also welcomed.</p>	<p>We reiterate our support for bus standing facilities, improvements to infrastructure for cyclists and widened pavements.</p>
	TO1	<p>TfL welcomes the proposal for contributions towards bus service improvements and the requirement to provide much needed bus terminating and standing facilities (which should include drivers’ facilities as part of any redevelopment). Early dialogue with TfL is advised to ensure that any provision meets operational needs.</p> <p>However, the suggested provision of car parking is not justified because the area is already congested, with high levels of pollutants generated by traffic. Parking would take up additional, valuable development space and there are other parking alternatives nearby. Any development should be car free to take advantage of the high PTAL and the opportunities for active travel. In this context, local cycle route improvements would be welcomed.</p>	<p>We reiterate our support for contributions towards bus service improvements and provision of bus terminating and standing including drivers’ facilities. We welcome removal of the suggested provision of car parking.</p>
	TO2	<p>Any development should be car free and the re-provision of hospital car parking should be limited to operational needs and Blue Badge car parking.</p>	<p>We welcome revised wording which encourages active travel and public transport and stating that car parking must achieve a balance between meeting essential needs and promoting modal shift away from the car.</p>

Section		Track change/comment – Reg. 18	Reg. 19 update
	TO3	Any development should be car free and existing parking removed. Care will need to be taken with access to minimise the impact on bus stops/stands.	We reiterate our previous comment. Existing parking should not be re-provided as part of any redevelopment to ensure conformity with London Plan Policy T6L
Roehampton	PM7	TfL welcomes the proposals to encourage a modal shift to walking and cycling, including the creation of new pedestrian and cycle connections. TfL also welcomes proposals to improve bus stops by relocating them in the main carriageway	We are concerned that the wording of C6 has been altered and no longer refers to relocating bus stops in the main carriageway. We would support a reversion to the original Reg. 18 wording.
	RO1	TfL welcomes proposals for any redevelopment to contribute towards improved walking and cycling facilities, enhanced bus services and bus supporting facilities including stops, stands and drivers’ facilities. Any relocation of the bus turnaround must ensure that it provides for improved operational efficiency and maximises flexibility. Advice should be sought from TfL on this issue.	We welcome the reference to bus service enhancements to Barnes and Putney stations. We note the new requirement to relocate the bus stands on Danebury Avenue adjacent to Downshire Field. Any relocation will need to be discussed and agreed with TfL London Buses and should provide sufficient space and drivers’ facilities.
	RO3	Any development should be car free and the re-provision of hospital car parking should be limited to operational needs and Blue Badge car parking.	We welcome revised wording which encourages active travel and public transport and stating that car parking must achieve a balance between meeting essential needs and promoting modal shift away from the car.

Section		Track change/comment – Reg. 18	Reg. 19 update
Balham	PM8	<p>Given the high PTAL and opportunities for active travel, all residential and office development should be car free. This should be clearly expressed in policy PM6 and emphasised in all site allocations.</p> <p>TfL welcomes measures to improve bus speeds and bus passenger waiting facilities as well as improvements to Cycle Superhighway 7 and other cycle lanes.</p> <p>TfL welcomes the requirement for development proposals to the eastern end of the town centre to reduce the dominance of existing surface car parking. However, this should go further by stating that car parking should be reduced (including removal of any surplus or under-used spaces).</p>	<p>We reiterate our support for specific measures and the scope to reduce car parking.</p>
	BA1	<p>Any redevelopment of the site should be car free. The opportunity should be taken to reduce the amount of public parking on site to maximise the developable area and to take into account the site's town centre location, high PTAL and opportunities for active travel.</p>	<p>We reiterate our point that car parking should be reduced as part of any redevelopment to ensure compliance with London Plan Policy T6L.</p>
Wandsworth's Riverside	PM9	<p>All developments with a PTAL of 4 or above should be car free and this should be clearly expressed in policy PM9 and emphasised in all relevant site allocations.</p> <p>We welcome the support for river transport for both passengers and freight, and improved walking and cycling routes along the riverside and connections to the surrounding area.</p>	
	RIV1	<p>The opportunity should be taken as part of the redevelopment to remove any surplus or underused parking spaces.</p>	<p>We welcome the statement that parking should not increase but this could go further and encourage the removal of any surplus or underused spaces.</p>

Section		Track change/comment – Reg. 18	Reg. 19 update
	RIVI 2/OU T4	The opportunity should be taken as part of the redevelopment to remove any surplus or underused parking spaces.	We reiterate our point that overall car parking should not be re-provided at previous levels to ensure compliance with London Plan Policy T6L.
Sites outside designa ted sub- areas	OUT 3	We welcome the requirement for improved bus, pedestrian and cycle links and supporting bus facilities	We would welcome wording which encourages active travel and public transport and stating that car parking must achieve a balance between meeting essential needs and promoting modal shift away from the car in line with other healthcare sites such as TO2 and RO3.
	OUT 3	Any redevelopment of this site should take the opportunity to reduce car parking and ensure that it does not exceed London Plan maximum standards.	We note that this site no longer forms part of the allocations.
	OUT 4	The introduction of new uses should be car free, and the opportunity taken to reduce any existing parking to cater for operational use and Blue Badge holders only.	We note that this site no longer forms part of the allocations.
	OUT 5	The introduction of new uses should be car free, and the opportunity taken to reduce any existing parking to cater for operational use and Blue Badge holders only.	The wording appears to support expansion of parking and it would be useful to revise wording in line with other healthcare sites such as TO2, RO3 and OUT3.

Section		Track change/comment – Reg. 18	Reg. 19 update
Urban Design	LP1	<p>TfL welcomes the encouragement of active travel and improved permeability. A useful cross reference could be made to the Healthy Streets Approach.</p> <p>Point 9 should state that ground floor design should give priority to providing high quality and safe access for people on foot and cycle rather than vehicle access.</p> <p>In line with Policy T6 in the London Plan, Parking Design and Management Plans should be required where parking is provided. The Mayor will be issuing guidance on this shortly.</p>	<p>We welcome the emphasis on providing high quality and safe access for pedestrians and cyclists.</p>
	LP7		<p>In part D there should be greater encouragement given to residential development which involves the replacement of parking or garages consistent with Policy H1 of the London Plan.</p>
Tackling Climate Change	LP14	<p>The contribution of reduced car use to improving air and noise pollution should be mentioned. Providing zero or limited car parking at new developments can help to manage and mitigate the impacts of new development.</p> <p>TfL welcomes the application of the Agent of Change principle, which is relevant to development adjacent to, or linked with, transport infrastructure.</p>	<p>We reiterate the point about acknowledging the potential contribution of reduced car use to achieving the policy objectives.</p>
Providing for Wandsworth's People	LP15	<p>TfL welcomes the emphasis on reducing car dependency, although specific measures to achieve this should be identified and set out.</p> <p>The policy and supporting text should reference the application of the Healthy Streets Approach as a practical measure to improve health and wellbeing as well as quality of place.</p>	<p>We welcome the added reference to the Healthy Streets Approach.</p>

Section		Track change/comment – Reg. 18	Reg. 19 update
Building a Strong Econo my	LP43	TfL welcomes the protection given to safeguarded wharves, which provide important infrastructure to support the transport of goods along the river. Given the presence of the wharves, the use of river transport for construction (including removal of waste) and bulk deliveries should be secured through planning conditions or obligations for larger sites, or areas with clusters of sites, where cooperation and consolidation may be possible (e.g. Wandsworth and Nine Elms).	
	LP50	LP50 provides support for meanwhile uses which could be relevant for sites that are safeguarded for major transport projects such as Crossrail 2.	

Section		Track change/comment – Reg. 18	Reg. 19 update
Sustainable Transport	LP51/ LP49	<p>TfL broadly supports this policy including the emphasis on Healthy Streets, reducing car dominance and improving conditions for walking, cycling and public transport. It would be helpful to include a direct reference to the objective set out in the borough’s LIP reflecting Mayoral targets to achieve a shift away from car travel so that 82% of trips are on foot, cycle or public transport by 2041 and state that development proposals will be expected to contribute towards achieving the target. It would also be helpful to include a reference to Vision Zero, in the context of road safety.</p> <p>In 20.9 the definition of sustainable transport modes is too widely drawn because low and ultra-low emission vehicles and car sharing do not address issues of congestion, road danger, severance and making streets less attractive for walking, cycling and dwelling. The MTS makes clear that car-based modes (including taxis and private hire vehicles as well as those listed above) are <u>not</u> included in the mix of sustainable modes for the purposes of modal split targets and the text should be amended to reflect this.</p> <p>Map 21 – Cycling Routes is helpful in identifying gaps in the network. It would be useful to confirm that contributions from developments will be secured to extend and improve the network.</p>	<p>We reiterate the point that it would be helpful to include the target for mode shift and that development proposals should demonstrate how they are contributing towards achieving the target.</p> <p>We welcome amended wording in 20.9 and the reference to Vision Zero in 20.17.</p>
	LP52/ LP50	<p>TfL welcomes the requirement for major trip generating development to be located where there is sufficient public transport access and capacity. The policy should also refer to the importance of connectivity by active travel modes.</p> <p>Although it is referred to elsewhere, the policy wording could be more explicit about the need for mitigation in the form of planning obligations or CIL contributions to remedy any deficiencies in access, capacity or connectivity.</p>	<p>We welcome reference to mitigation requirements.</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
LP53/ LP51	<p>TfL welcomes the requirement to comply with London Plan standards for both cycle parking and car parking. We welcome the importance attached to the quality as well as the quantity of cycle parking in 20.29. This could usefully reference guidance on cycle parking in the London Cycling Design Standards</p> <p>However, it is not appropriate as suggested here to substitute cycle hire provision for adequate cycle parking. The two serve different markets because cycle hire is designed for short trips when a personal cycle is not available e.g. for visitors, one leg of a complex multi modal trip or for leisure cycling, and does not provide the flexibility or certainty for the regular user that guaranteed access to cycle parking at the home, workplace or shopping destination does provide. Any requirement for contributions towards cycle hire provision should be additional to meeting minimum cycle parking standards and not in lieu of it.</p> <p>The wording of part B should make clear that by referencing Table 10.3 of the London Plan, it is only covering residential car parking. Part C should clarify that maximum retail parking standards in Table 10.5 of the London Plan would be applied and the text in 20.25 should remove mention of retail and leisure car parking being considered favourably where PTAL is high because all retail developments in PTAL 5 and 6 should be car free. Similarly, the text later in the same paragraph that states developments should provide ‘adequate’ car parking must be removed.</p> <p>It should be noted that car clubs may play a role in reducing car dependency, but only if they are paired with measures to reduce private car ownership, rather than effectively widening access to car use. The London Plan counts car clubs towards the maximum parking standards for this reason and Policy T6.1 D makes it clear that they are not appropriate in the Central Activities Zone.</p> <p>TfL welcomes the requirement for electric vehicle charging points to be provided in line with London Plan requirements. In 20.31 caution should be exercised when encouraging rapid charging facilities at destinations such as retail developments because this risks encouraging additional car trips solely to visit the rapid charging points rather than using a charging facility at home.</p>	<p>We welcome the reference to London Cycling Design Standards in paragraph 20.29 and removal of the suggestion that cycle hire provision could substitute for cycle parking. However, we support contributions towards improved cycle hire provision where appropriate. We welcome clarification that A2 refers to residential parking although we suggest that ‘is provided’ could be omitted to allow for car free development. It is not clear why the final sentence of A2 refers to policy LP1 or what purpose this serves. We welcome clarification in A3 that London Plan retail parking standards would be applied. We welcome the amended wording in supporting paragraph 20.33 on retail parking. We have concerns about new paragraph 20.36 which states that ‘The Council supports the provision of car parking spaces for key workers within new developments...’ Reference is made to using the Mayor of London’s list of key workers. It should be stressed that the list of key workers (which has now been published) is purely to guide the allocation of intermediate housing and is not intended to be used to influence parking policies. We strongly recommend that this paragraph is deleted because such a wide definition of key workers would lead to exemptions and could undermine implementation of London Plan parking policies raising potential issues of conformity. We also have questions about what evidence is being used to underpin this policy.</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
	<p>In Parts I and J TfL welcomes the encouragement given to conversion of car parking to other uses, but in part I it should be extended from just residential conversions to all forms of development. In Part J it should be noted that there are underlying trends towards a reduction in retail trips, particularly by car and so looking into the future, the requirement for car parking is likely to decrease over time.</p> <p>In part K car free residential development should be required for PTAL 4 and above while all office development should be car free. The wording of 20.32 needs to be updated to reflect this car free requirement for all office developments. The additional requirement for public transport interchanges to be close by is superfluous and should be deleted. A single station, interchange or stop serving a range of destinations may result in a high PTAL and would provide an appropriate location for car free development. Similarly, it should not be a requirement for a Transport Assessment to have to demonstrate the case for car free development where this is compliant with the London Plan parking standards.</p> <p>In Part L TfL welcomes encouragement of low car development although this should apply only to residential development in PTAL 3 and appropriate locations in a lower PTAL (e.g. where connectivity is good, active travel opportunities are available or where public transport improvements are planned). As noted above car free (rather than just low car) development is required in PTAL 4.</p> <p>TfL welcomes the continued commitment to no additional parking permits being issued to occupiers of new housing. For existing occupiers being rehoused as part of estate redevelopments, parking permits should be limited to residents who already have parking permits or who own and park a car on the estate.</p>	<p>We welcome clarification that car free development is required in areas of PTAL 4 or above. However, to ensure conformity with London Plan policy T6, the requirement for car free residential development should be extended to all parts of the designated Opportunity Areas of Vauxhall Nine Elms Battersea (VNEB) and Clapham Junction. In our response to the Reg. 18 version we asked for this to be clarified for relevant sites in Vauxhall Nine Elms Battersea and Clapham Junction Opportunity Areas, but it should be included here in the policy wording to avoid confusion, particularly now that car free requirements have been removed from specific sites. The wording of paragraph 20.34 needs to reflect the car free requirement for offices on all sites. We welcome the removal of references to proximity to public transport and clarification that a TA does not need to demonstrate a case for car free development. We encourage you to support low car development in lower PTAL areas with good connectivity and active travel links. We welcome clarification regarding parking permits for existing occupiers.</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
	<p>We would like to see an additional commitment to extend CPZs or other parking controls where these are considered necessary to address potential concerns about on street parking pressures. Funding from development can be used to carry out surveys and implementation. The absence of a CPZ should not be used as a justification for providing additional car parking. This should be referenced in the text in 20.26 and in 20.33.</p> <p>In 20.27 we welcome the requirement for Delivery and Servicing Plans and Construction Logistics Plans. These should be updated to reference London Plan Policy T7 rather than the London Freight Plan. The Local Plan should also provide general encouragement to the development of facilities to promote the sustainable movement or transfer of freight and to ensure opportunities are taken to minimise freight impacts of development on the transport network.</p>	<p>We welcome the statement in paragraph 20.28 that the absence of a CPZ is not justification for providing additional car parking. We also welcome the reference to London Plan Policy T7 in paragraph 20.29.</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
LP54	<p>TfL welcomes the Council’s support for, and commitment to, the major transport infrastructure projects listed in part A, including the Northern line extension to Battersea and Crossrail 2. The Local Plan should take account of the following project update for Crossrail 2:</p> <p><i>‘The funding agreement with the Government of 31 October 2020 includes a commitment by relation to Crossrail 2 that TfL “prioritises safeguarding activity and brings an orderly end to consultancy work as soon as possible. DfT will support such safeguarding activity for this project required.”</i></p> <p><i>We will work to help the Secretary of State refresh the safeguarding directions in order to safeguard the scheme’s latest proposed route from future developments. We are in discussion with DfT on a likely timetable for this work. We will also continue to work with stakeholders whose developments are affected by the safeguarding so that we can continue to protect the route until such time as the railway can be progressed.</i></p> <p><i>Given TfL’s current finances and the lack of a viable funding package for the scheme at the moment we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will be needed in future to support London’s growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right.</i></p> <p>Crossrail 2 Safeguarding appears on various plans in the document and looks to reflect the 2015 Safeguarding Directions, including the route alignment and Areas of Surface Interest (AOSI) as set out in the plans accompanying the Direction. Where Crossrail 2 Safeguarding is mentioned it should be made clear that it is the Crossrail 2 2015 Directions and plans that are being referred to</p> <p>Paragraph 20.6 provides in principle support for a further extension of the Northern line beyond Battersea to Clapham Junction. There are no current plans for an extension beyond the planned terminus at Battersea Power Station and it does not feature in the list of strategic transport schemes in Table 10.1 of the London Plan. As such, it would be unlikely to go ahead within the Local Plan timeframe.</p>	<p>We note that a generic reference to highway improvement schemes has been added to the list of transport infrastructure projects supported by the borough. To avoid confusion, it would be better to refer to Wandsworth Gyratory specifically. Support for highway improvement schemes that increase capacity for general traffic would be contrary to the MTS and London Plan.</p> <p>We note that reference to a further extension of the Northern line beyond Battersea to Clapham Junction has been removed.</p>

Section	Track change/comment – Reg. 18	Reg. 19 update
	<p>The section on safeguarding and retention of transport land in part A 1 is welcomed, but the wording should more closely follow London Plan Policy T3. For clarity, it would be helpful to refer to TfL as well as other stakeholders. This includes bus garages and rail depots where TfL may not be the owner nor the operator.</p> <p>TfL also welcomes the intention to safeguard land for future transport functions. This should include both statutory safeguarding and transport projects or areas for expansion where there is a likelihood that land may be required within the Local Plan period. Land for freight uses, including transfer, interchange, consolidation and last mile deliveries may also need to be identified. Although financial contributions may be appropriate and justified, they should not be an alternative to the provision of land where this has been identified as necessary to implement a project.</p> <p>TfL welcomes the reference to the Healthy Streets Approach in part B but the bullet points 1 – 4 all seem to relate to provision of riverside walks mentioned under part A 3.</p>	<p>We reiterate comments about the need for the text on safeguarding to more closely follow London Plan Policy T3, and to refer to consultation with TfL. It is not clear why section A2 from the Reg. 18 version on safeguarding of land for future transport has been removed as this may jeopardise our ability to secure land needed for expansion of transport services. We also repeat comments about the relevance of bullet points 1 – 4 to part B. There appears to be something missing from the text on riverside routes, particularly now that part C has been removed.</p>