

Statement of Common Ground Between

London Borough of Wandsworth and
Transport for London (TfL)

18 October 2022

1. Introduction

A Statement of Common Ground (SCG) is a written record of the progress made by strategic policy-making authorities during the process of planning for cross-boundary matters. This SCG has been prepared to demonstrate that Wandsworth's draft Local Plan is '*based on effective joint working on cross-boundary strategic matters*', in accordance with the requirements of paragraph 27 of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance chapter on Maintaining Effective Co-operation.

This SCG focuses on strategic cross-boundary matters being addressed and progress in cooperating to address them. It also forms part of the evidence demonstrating compliance with the 'duty to cooperate'. In the London context, most strategic issues beyond borough boundaries (e.g. housing targets, major growth areas, etc.) are largely addressed by the London Plan.

It seeks to provide clarification of the extent to which matters raised in Transport for London's (TfL)'s Regulation 19 representations have been addressed through ongoing collaboration. It also clarifies the extent to which matters raised by TfL are matters of general conformity or general comment.


Updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues. It therefore includes details on mechanisms for review and updating. It forms part of the evidence to demonstrate compliance with the 'duty to cooperate'. The document is intended to be 'live', updated as circumstances change, and agreement occurs on any outstanding issues.

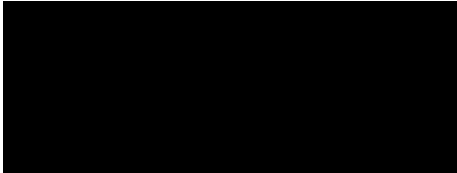
The Wandsworth Local Plan (Regulation 19) was submitted to the Secretary of State on 29 April 2022.

2. Parties Involved

This SCG has been prepared by Wandsworth Council in agreement with Transport for London. It principally addresses strategic transport policies to be addressed directly by collaboration with TfL. The Council is engaged with them on strategic matters on an on-going basis.

3. Signatories

Both parties consider that the amendments include below address some of the concerns raised by Transport for London in their Regulation 19 response to Wandsworth Local Plan but there remain a number of outstanding points of disagreement. Signed on Behalf of the London Borough of Wandsworth		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Spatial Planning and Design Team Manager		18/10/22

Signed on Behalf of Transport for London		
Name and Position	Signature	Date
Josephine Vos London Plan and Planning Obligations Manager TfL Planning		19/10/22

4. Strategic Geography

This section sets out the factual position regarding cross boundary matters.

Sitting in south-west London, Wandsworth is an inner London borough bordered by the London Boroughs of Lambeth, Merton and Richmond and the Royal Borough of Kingston Upon Thames and, across the River Thames, the London Borough of Hammersmith and Fulham, Westminster City Council and the Royal Borough of Kensington and Chelsea.

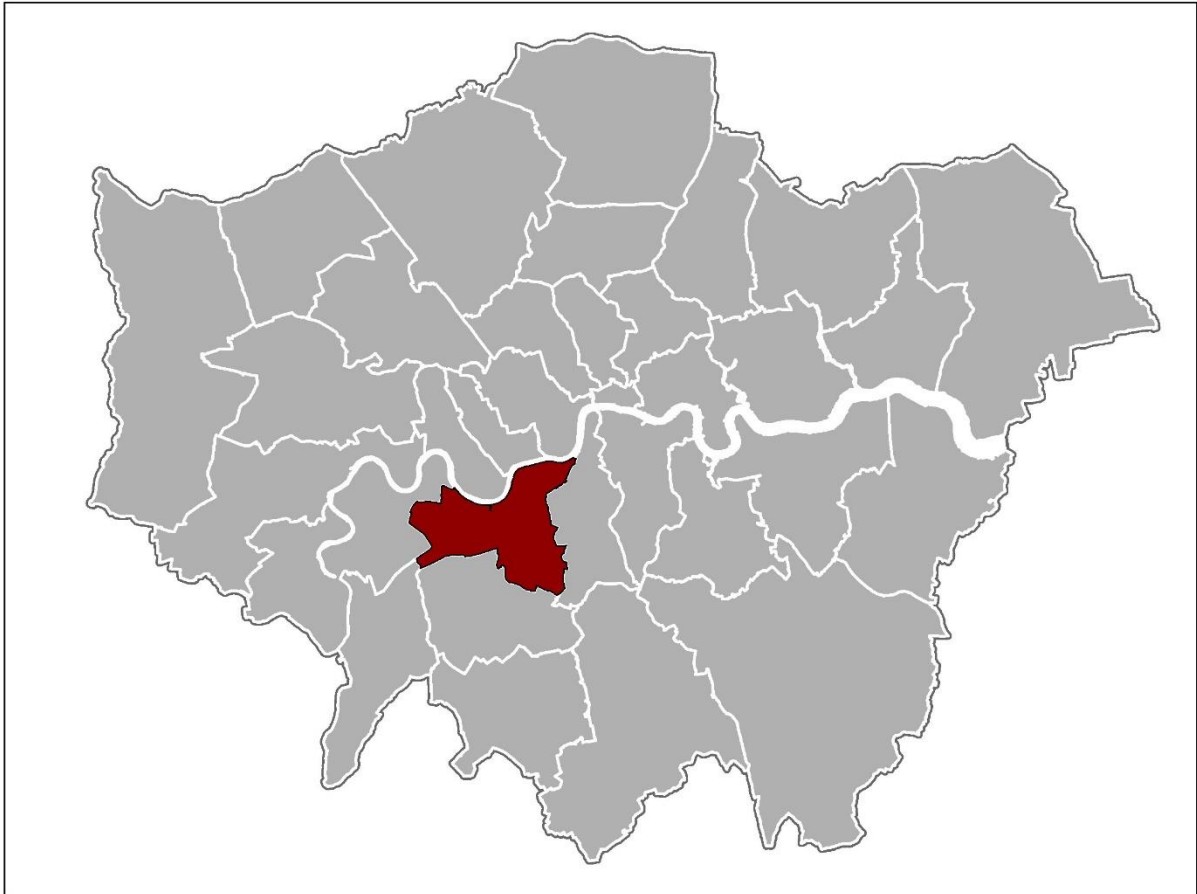
Transport for London (TfL) is the integrated transport authority responsible for the implementation of the Mayor's Transport Strategy (2018). The Strategy uses the 'Healthy Streets Approach', making health and personal experience the priority in planning the city. The Healthy Streets Approach is applied to the whole transport system to help create:

- Healthy streets and healthy people
- A good public transport experience
- New homes and jobs

The boroughs are required to work with TfL to support the implementation of the Mayor's Transport Strategy.

TfL runs the day-to-day operation of the city's public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams). Network Rail own, operate and develop London's rail infrastructure (to become Great British Railways from 2023).

The area shown in the map below has been identified as the strategic planning area for the purposes of the SCG.



The London Plan

The London Plan is the spatial development strategy for London, produced by the GLA on behalf of the Mayor of London. It was formally published on the 2 March 2021, and now forms part of London Borough Wandsworth's (LBW) Development Plan and contains the most up-to-date policies.

Every London borough local plan must be in **general conformity** with the published London Plan, and the GLA determines whether this has been achieved, or not, and in the case of the latter, where differences exist. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans. In a London context, collaboration on many strategic issues – such as the distribution of housing, identification of major growth areas, strategic infrastructure etc – are largely addressed through the London Plan, and the formal and informal arrangements that exist between boroughs to enable this to happen.

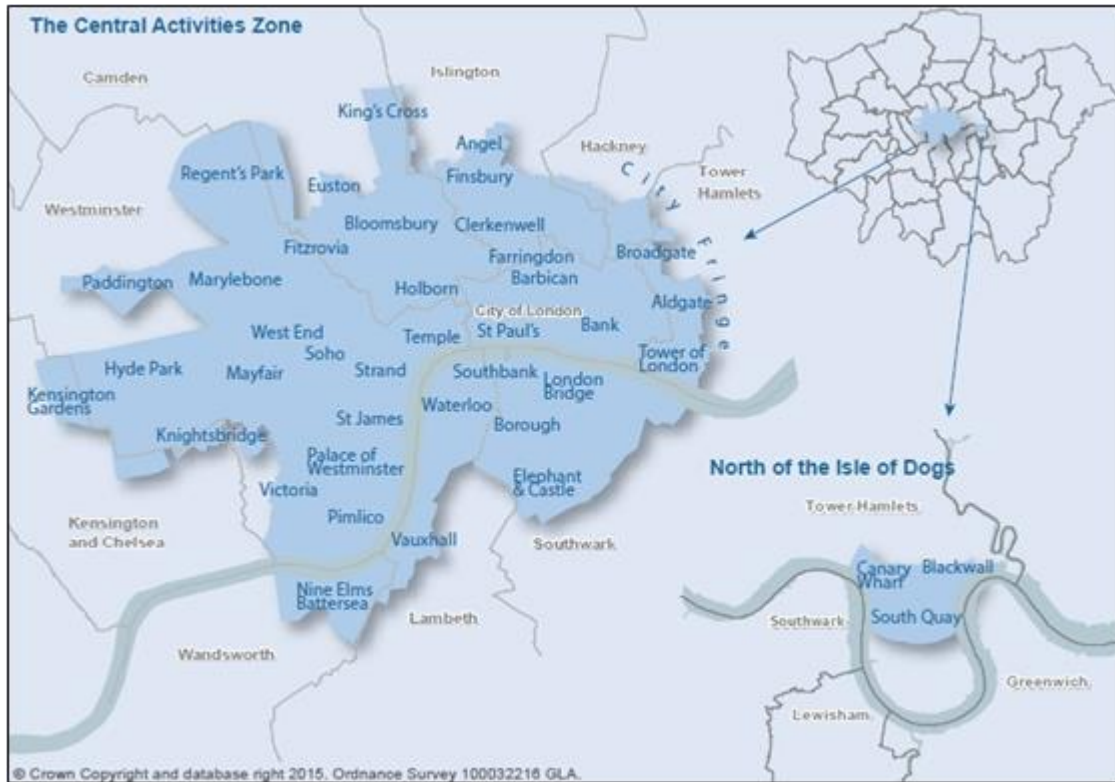
Mayor's Transport Strategy

The Mayor's Transport Strategy sets out his plans to transform London's streets, improve public transport and create opportunities for new homes and jobs. To achieve this, the Mayor wants to encourage more people to walk, cycle and use public transport. The current strategy was published in March 2018, and uses the Healthy Streets Approach to prioritise improved streets and street networks that encourage walking, cycling and greater public transport usage, deliver a good public transport experience and to unlock opportunities for growth in new areas.

Shared Planning Matters

Central Activities Zone

The London Plan identifies a large area of central London as the Central Activities Zone (CAZ), recognising its contribution to the country’s economy and the concentration of businesses, services and other activities taking place within it. The London Plan protects this area in recognition of the agglomeration that results in exceptional productivity and national benefits, which warrants a different or tailored approach to the application of national policy to address its distinct circumstances.



Within Wandsworth, the CAZ area encompasses the Vauxhall, Nine Elms and Battersea Opportunity Area (VNEB OA). The aims and objectives for the CAZ, as expressed in the London Plan, are interpreted within Local Plans by constituent boroughs to ensure conformity with the London Plan.

Opportunity Areas

The London Plan identifies areas that will see the most significant change as Opportunity Areas (OAs). Many OAs are already seeing significant development and have the potential to deliver a substantial amount of the new homes and jobs. There are two Opportunity Areas within Wandsworth, one of which is existing (VNEB), and the other, Clapham Junction OA, is newly designated in the London Plan 2021.

The VNEB OA crosses the border between Wandsworth and Lambeth. The London Plan states that it has the potential to deliver greater levels of housing alongside employment than the other CAZ Opportunity Areas. In these areas, offices and other CAZ strategic functions may be given equal weight relative to new residential development.

The Clapham Junction Opportunity Area has been identified to capitalise on both the longer term objectives which would be brought about through the planned Crossrail 2 route through Clapham Junction railway station, and shorter term objectives including the improvements to the station interchange and nearby mixed use development and regeneration opportunities which would allow for a co-ordinated approach for future development.

Town and Local Centres

The London Plan identifies a hierarchy of the city's larger town centres, recognising the different size, draw and function of them. The Wandsworth Local Plan identifies five town centres – Wandsworth Town, Putney, Balham, Clapham Junction and Tooting – and beneath this it also identifies local centres and important local parades within the borough. (The London Plan identifies Battersea Power Station as a future CAZ retail cluster).

Transport

Main roads that cross Wandsworth and link with surrounding boroughs include:

London Distributor Roads:

- A216 (Mitcham Lane) (Lambeth – Wandsworth – Merton)
- A3036 (Lavender Hill/ Wandsworth Road) (Lambeth – Wandsworth)

TfL Road Networks:

- A214 (Tooting Bec Road) (Lambeth – Wandsworth)
- A24 (Balham Hill) (Lambeth – Wandsworth – Merton)
- A205 (The Avenue) (Lambeth – Wandsworth – Richmond)
- A3 (Long Road) (Lambeth – Wandsworth – Kingston)
- A3205 (Nine Elms Lane) (Lambeth – Wandsworth)
- A217 (London Road) (Merton – Wandsworth – Hammersmith and Fulham)
- A218 (Durnsford Road) (Merton – Wandsworth)
- A219 (Wimbledon Park Side / Putney High Street) (Merton – Wandsworth – Hammersmith and Fulham)
- A3220 (Battersea Bridge Road) (Kensington and Chelsea – Wandsworth)
- A3216 (Chelsea Bridge Road) (Kensington and Chelsea – Wandsworth)

Overground rail lines that cross the border between Wandsworth and surrounding boroughs:

- Vauxhall – Queenstown Road (South Western) (Lambeth)
- Streatham Hill – Balham (Southern) (Lambeth)
- Streatham Common – Balham (Southern) (Lambeth)
- Imperial Wharf – Clapham Junction – Wandsworth Road (London Overground) (Hammersmith and Fulham – Wandsworth – Lambeth)
- Earlsfield – Wimbledon (South Western) (Merton)
- Putney – Barnes (South Western) (Richmond)
- Victoria – Battersea Park (Southern) (Westminster)
- Wimbledon loop (Central London – Streatham (Lambeth) – Tooting (Wandsworth) – Haydon's Road, Wimbledon, South Merton, Morden South (Merton) – Sutton)

Underground rail lines that cross border between Wandsworth and surrounding boroughs::

- Northern Line (Lambeth, Merton)
- District Line (Hammersmith and Fulham and Merton)

The Wandsworth Local Plan advocates support for the main ongoing infrastructure projects in the borough, including the Thames Tideway Tunnel and Crossrail 2. Wandsworth is committed to working on these projects with Transport for London and neighbouring boroughs. Two new bridges

have been proposed for the Thames, these being the Nine Elms to Pimlico bridge (Wandsworth to Westminster) and the Cremorne (Diamond Jubilee) Bridge (Wandsworth to Hammersmith and Fulham). The Thames Tideway project is due for completion in 2024/2025.

For Crossrail 2, the Plan recognises that the project may not come forward in the original planned timescale (having been put on hold in November 2020), and therefore incorporates a 'fallback' option, that major development sites – particularly in Clapham Junction – would still be suitable for redevelopment even without this infrastructure, albeit on a likely reduced scale. Tooting is Wandsworth Council's preferred location for a station on the Crossrail 2 project. This would necessitate the comprehensive redevelopment of Tooting town centre (in particular the area around the current station). The Area Strategy for Tooting emphasises the protection of the area, including the retention (or reprovision) of the markets.

The Local Plan area strategy for Nine Elms promotes the development of the Nine Elms Pimlico Bridge, with the Kirtling Street area of Nine Elms identified as the preferred landing site on the south bank. The bridge would connect the community in Pimlico with the new developments in Nine Elms and create new opportunities for active travel.

Wandsworth and **Hammersmith and Fulham / Kensington and Chelsea** are coordinating efforts on the respective riverside activities through LIP, CIL and TfL funding packages, which includes the Cremorne Bridge. Wandsworth and Richmond have discussed some specific proposals/plans close to the boundary between the authorities, including Crossrail 2 and potential to improve links between Roehampton and Barnes Station.

Green infrastructure

Wandsworth contains some significant areas of Metropolitan Open Land that form part of the city-wide network of open spaces. This resource includes all of the major commons and parks, including Clapham Common, Lambeth and Streatham Cemeteries, Wandsworth Park and Wandsworth Common. Wandsworth also contains significant historic parks and gardens, including Springfield Hospital and part of Wimbledon Park.

River Thames

The Thames runs along the northern boundary of Wandsworth. There are river services on the Thames for both passengers and freight, and Wandsworth has five protected wharves (Cringle Dock, Pier Wharf, Middle Wharf, Smuggler's Way Wharf, Kirtling Wharf).

Transport for London submitted a number of representations to the Publication Local Plan Consultation (January 2022). This Statement of Common Ground seeks to establish areas of agreement between the London Borough of Wandsworth and Transport for London and proposes minor changes to the Submission Local Plan prior to public examination. This Inspector is asked to consider these changes. The Statement also identifies those areas where further discussion and agreement may be required during the examination itself.

Text proposed to be inserted in *italicised and underlined*

Text proposed to be removed in ~~strikethrough~~

SoCG ref #	Reps from Transport for London	Response ref #	Prop. Main Mod #	Para/ Policy no.	Council Response	Proposed Modification	Agreed?
	General						
1	<p>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 prepublication (Reg. 18) version. This response provides an updated set of comments reflecting the changes made to the Local Plan.</p> <p>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,</p>	588	PPAM/088 PPMM/123	General Comment	<p>The Regulation 19 Version of the Local Plan has been developed to be in general conformity with the London Plan. The Council's detailed transport policies and proposals are set out in its statutory Third Local Implementation Plan (LIP) which align with the Mayor of London's Transport Strategy and should be read with the Local Plan as part of a holistic understanding of how the transport environment in Wandsworth will evolve. The Local Plan supports the Healthy Streets Approach and Vision Zero and makes reference to them in the Reg 19 draft of the Local Plan.</p> <p>It is considered that the introduction to the Sustainable Transport chapter could</p>	<p>Amend wording in paragraph 20.7 as follows:</p> <p>'20.7 Development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. <i><u>They will need to demonstrate how they are helping achieve the LIP and Mayoral target of a shift away from car travel so that 82% of trips are on foot, cycle or public transport by 2041.</u></i>'</p> <p>Amend wording in paragraph 20.36 as follows:</p>	Area of disagreement

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	<p>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.</p> <p>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.</p> <p>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</p>				<p>reiterate the Mayor's modal share shift targets to ensure consistency with the rest of the Local Plan introduction chapters which establish goals where relevant.</p> <p>The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free. The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas to also require car-free development but considers that further analysis will need to be done to review whether this is appropriate for Wandsworth. We will investigate the PTAL ratings for the Opportunity Areas and if there are any sites below car-free threshold within the Opportunity Areas then it is the Council's position that such sites may benefit from residential car parking.</p> <p>The Council acknowledge that the provision of parking spaces for key workers is an important issue. The wording of paragraph 20.36 is proposed to be amended to clarify the Council's position in support of key worker parking provision. Parking permits for</p>	<p>20.36 The Council supports the provision of car parking spaces for key workers within new developments. The Mayor of London is currently producing a list of key workers which Wandsworth will use to provide guidance on the distribution of car parking spaces that are created for key workers. Additionally, Car Parking Zone policies will be amended to allow key workers who require use of a vehicle greater access to parking permits. <u>Within the parameters of Policy LP51 and where parking is to be provided at new housing developments, the Council will prioritise key workers in the allocation of car parking spaces. The Mayor of London has produced a list of key workers (contained within the Housing Policy Practice Note, 'Allocating intermediate homes to London's key workers', December 2021), and this will provide a basis for the definition of key workers.</u></p> <p><u>The Council's priority is to help those key workers on lower incomes, with a place of work away from their own home, to travel to work where public</u></p>	

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	<p>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.</p> <p>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.</p> <p>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.</p>				key workers was a temporary measure during the lockdown, and there is no current priority provision for key workers within CPZ.	<u>transport options are more limited. This support, therefore, is more likely to be appropriate where developments are providing affordable housing in locations with poor PTAL ratings.</u>	
2	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.'	588	NA	PM2	Support noted.	No change considered necessary.	Agreed

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3	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.	588	PPAM/009	WT1	The date of implementation of the Wandsworth Gyrotory project was not updated after the Regulation 18 Consultation due to an administrative error and it is proposed that it could be amended.	Amend wording in paragraph 4.19 as follows: '4.19 ... This recognises that parts of these properties will be required to implement the TfL scheme – programmed to be implemented by 2025 <u>4</u> , <u>subject to approvals</u> - and will be acquired by TfL.'	Agreed
4	Paragraph 4.40 should state that vehicle access and servicing should be from Smugglers Way rather than Armoury Way.	588	NA	WT4	The Council does not consider there to be sufficient reason to remove the flexibility as to which road vehicular access and servicing comes onto the Gasholder Cluster from and considers that paragraph 4.40 should remain unchanged.	No change considered necessary as it is considered flexibility is appropriate in this regard as the site is in early stages of development. Final access arrangements will be considered at the application stage.	Area of disagreement
5	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).	588	PPAM/018	PM3	The completion date for the Northern Line extension was not updated after the Regulation 18 Consultation due to an administrative error and it is proposed that it could be amended. The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free. The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas	Amend wording in paragraph 5.3 as follows: '5.3 ...The VNEB OA has been the focus for considerable new development since the adoption of the OAPF in 2012, and this is expected to continue with an intense construction period in the years immediately following the opening of the Northern Line Extension in Autumn 2021 .	Area of disagreement.

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					to also require car-free development but considers that further analysis will need to be done to review whether this is appropriate for Wandsworth. We will investigate the PTAL ratings for the Opportunity Areas and if there are any sites below car-free threshold within the Opportunity Areas then it is the Council's position that such sites may benefit from residential car parking.	Amend wording in paragraph 5.74 as follows: 5.74 Active Travel - Contributions to upgrade pedestrian routes to/from Battersea Park Station and Queenstown Road Station and improve accessibility to the new Northern Line station at Battersea Power Station, currently expected to open in Autumn 2021 will be required.	
6	We reiterate our support for the requirement to retain and protect Battersea bus garage.	588	NA	NE6/ NE7/ NE8	The Battersea Bus Garage is characterised as an industrial zone and will be maintained and the existing uses explicitly protected in line with LP34 Managing Land for Industry and Distribution.	No change considered necessary	Agreed
7	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 Clapham Junction as well as areas of PTAL 4 and above to ensure conformity with London Plan Policy T6.1 (see comment under LP51 below). We welcome changes to the plans to amend references to Crossrail safeguarding.	588	NA	PM4	The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas to also require car-free development. The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free.	No change considered necessary	Area of disagreement.
8	We welcome the references to engagement with TfL.	588	NA	CJ3	Support noted.	No change considered necessary	Agreed

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9	We welcome changes to the Crossrail 2 references.	588	NA	CJ4	Support noted.	No change considered necessary	Agreed
10	We would welcome specific reference to retention of bus standing and turning and implementing the York Road Corridor Study.	588	PPMM/047	CJ5	Site Allocation CJ5 Winstanley / York Road Regeneration Area is considered sound but to improve consistency and include all necessary information regarding public transport it is considered that an additional paragraph could be included to extrapolate on the development considerations for the site allocation.	Include after paragraph 6.64 a new paragraph as follows: <i><u>'Public Transport - Improvements to York Road's public transport infrastructure may be required depending on the impact of development. The provision and maintenance of sustainable travel facilities such as bus standing and turning space on site could be required.'</u></i>	Agreed
11	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.	588	NA	PM5	Comment noted.	No change considered necessary	Agreed

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12	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	588	TBC	PUT1	Comment agreed.	Amend wording to paragraph 7.18 as follows: Parking - Consider provision of public car parking on the site with 2-hour limit and improve access to the site. Car club provision for residential/commercial use and surrounding area would be appropriate.	Agreed
13	We reiterate the point about existing parking not being replaced as part of any redevelopment to ensure conformity with London Plan Policy T6L	588	NA	PUT2 / PUT3/ PUT4/ PUT5/ PUT6	Site Allocations PUT2 /PUT3/ PUT4 /PUT5/ PUT6 do not set out any requirement for new or replacement car parking to be provided. Proposals for such development would need to be in conformity with the London Plan Policy T6L.	No change considered necessary	Agreed
14	We reiterate our support for bus standing facilities, improvements to infrastructure for cyclists and widened pavements.	588	NA	PM6	Support noted.	No change considered necessary.	Agreed
15	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.	588	NA	TO1	Support noted.	No change considered necessary.	Agreed
16	We welcome revised wording which encourages active travel and public transport and stating that car parking must achieve a	588	NA	TO2	Support noted.	No change considered necessary.	Agreed

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	balance between meeting essential needs and promoting modal shift away from the car.						
17	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	588	PPMM/053 PPMM/054	TO3	To remain consistent with Policy T6L of the London Plan the requirement for parking at site allocation TO3 could be removed.	Amend paragraph 8.34 and 8.35 as follows: 8.34 Access – The parking and access to the west should be <u>redeveloped</u> retained with public realm enhancements provided for pedestrians. 8.35 Parking – Servicing should take place directly from the Garratt Lane frontage subject to the constraints of the bus bays.	Agreed
18	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.	588	PPAM/050	PM7	Comment noted. Due to an administrative error this clause to PM7 C6 was removed and should be reinserted.	Amend wording to policy PM7 Roehampton and Alton Estate Regeneration Area C (6) as follows: '6. Measures to improve public transport facilities by relocating existing bus stops in lay-bys along Danebury Avenue <u>into the carriageway</u> , and by creating additional bus stops will be supported.'	Agreed
19	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	588	NA	RO1	Comments noted.	No change considered necessary.	Agreed

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	discussed and agreed with TfL London Buses and should provide sufficient space and drivers' facilities.						
20	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.	588	NA	RO3	Support noted.	No change considered necessary.	Agreed
21	We reiterate our support for specific measures and the scope to reduce car parking.	588	NA	PM8	Support noted.	No change considered necessary.	Agreed
22	We reiterate our point that car parking should be reduced as part of any redevelopment to ensure compliance with London Plan Policy T6L.	588	NA	BA1	Car parking at site allocation BA1 Sainsbury's Car Park will be reduced as part of any redevelopment to remain in line with London Plan Policy T6L which requires that any redevelopment should reflect the current approach to parking provision and not be re-provided at previous levels.	No change considered necessary.	Agreed
23	We welcome the statement that parking should not increase but this could go further and encourage the removal of any surplus or underused spaces	588	NA	RIV11	Comment noted.	No change considered necessary.	Agreed
24	We reiterate our point that overall car parking should not be re-provided at previous levels to ensure compliance with London Plan Policy T6L.	588	NA	RIV12/ OUT4	Due to the low PTAL of RIV11 and OUT4 the existing wording regarding parking is considered sufficient for both allocations and in conformity with London Plan Policy T6L.	No change considered necessary.	Agreed

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25	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.	588	PPMM/062 PPAM/070 PPMM/063	OUT3/ OUT5	To ensure consistency with the other site allocation with healthcare uses, OUT3 and OUT5 could include reference to the inclusion of parking.	<p>Include after paragraph 13.14 a new paragraph as follows:</p> <p><u>'Parking - Measures to encourage active travel and the use of public transport will be strongly supported. Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and encouraging modal shift away from the private car.'</u></p> <p>Amend wording in paragraph 13.28 as follows:</p> <p>13.28 Development, including residential use with the re-provision and expansion of healthcare facilities and parking</p> <p>Include after map 13.5 new paragraphs as follows:</p> <p><u>'Development Consideration</u></p> <p><u>'Parking - Measures to encourage active travel and the use of public transport will be strongly supported. Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and</u></p>	Agreed

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						<i><u>encouraging modal shift away from the private car.'</u></i>	
26	We note that this site no longer forms part of the allocations.	588	NA	OUT 3	Comment noted.	No change considered necessary	Agreed
27	We note that this site no longer forms part of the allocations.	588	NA	OUT 4	Comment noted.	No change considered necessary	Agreed
28	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.	588	PPAM/070 PPMM/063	OUT 5	To ensure consistency with the other site allocation with healthcare uses, OUT5 could include reference to the inclusion of parking.	Amend wording in paragraph 13.28 as follows: 13.28 Development, including residential use with the re-provision and expansion of healthcare facilities and parking Include after map 13.5 new paragraphs as follows: <u>'Development Consideration</u> <u>Parking - Measures to encourage active travel and the use of public transport will be strongly supported.</u> <u>Car parking provision for healthcare uses should achieve a balance between meeting essential needs for patients, staff and visitors and encouraging modal shift away from the private car.</u>	Agreed

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29	We welcome the emphasis on providing high quality and safe access for pedestrians and cyclists.	588	NA	LP1	Support noted.	No change considered necessary.	Agreed
30	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.	588	NA	LP7	Policy LP7 (D) encourages replacement of parking and garages where these are no longer required. No further clarification is deemed necessary.	No change considered necessary.	Agreed
31	We reiterate the point about acknowledging the potential contribution of reduced car use to achieving the policy objectives	588	NA	LP14	Comment noted. The Local Plan is to be read holistically and reference to the benefits to air quality of reduced car use is set out in LP49 Sustainable Transport.	No change considered necessary	Agreed
32	We welcome the added reference to the Healthy Streets Approach	588	NA	LP15	Support noted.	No change considered necessary	Agreed
33	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. We welcome amended wording in 20.9 and the reference to Vision Zero in 20.17.	588	PPAM/088	LP51/ LP49	It is considered that the introduction to the Sustainable Transport chapter could reiterate the Mayor's modal share shift targets to ensure consistency with the rest of the Local Plan introduction chapters which establish goals where relevant.	Amend wording in paragraph 20.7 as follows: '20.7 Development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. <i><u>They will need to demonstrate how they are helping achieve the LIP and Mayoral target of a shift away from car travel so that 82% of trips are on foot, cycle or public transport by 2041.</u></i> '	Agreed

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33	We welcome reference to mitigation requirements.	588	NA	LP52/ LP50	Support noted.	No change considered necessary.	Agreed
34	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	588	PPMM/123 PPAM/089	LP53/ LP51	<p>LP51 A2 does require that development proposals demonstrate "that parking on site is the minimum necessary" which is considered sufficient.</p> <p>LP51 A2 refers to policy LP1 the Design-Led Approach as it sets out guidance for how developments should incorporate off street parking within a design-led approach where necessary.</p> <p>The Council acknowledge that the provision of parking spaces for key workers is an important issue. The wording of paragraph 20.36 is proposed to be amended to clarify the Council's position in support of key worker parking provision. Parking permits for key workers was a temporary measure during the lockdown, and there is no current priority provision for key workers within CPZ.</p> <p>The Council do not agree with TfL and the London Plan and assert that there may be areas within Wandsworth's Opportunity Areas which should not be designated as car-free. The Council acknowledges that the London Plan sets out a requirement for Opportunity Areas</p>	<p>Amend wording in paragraph 20.36 as follows:</p> <p>20.36 The Council supports the provision of car parking spaces for key workers within new developments. The Mayor of London is currently producing a list of key workers which Wandsworth will use to provide guidance on the distribution of car parking spaces that are created for key workers. Additionally, Car Parking Zone policies will be amended to allow key workers who require use of a vehicle greater access to parking permits. Within the parameters of Policy LP51 and where parking is to be provided at new housing developments, the Council will prioritise key workers in the allocation of car parking spaces. The Mayor of London has produced a list of key workers (contained within the Housing Policy Practice Note, 'Allocating intermediate homes to London's key workers', December</p>	Area of disagreement

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	<p>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. 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. 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</p>				<p>to also require car-free development but considers that further analysis will need to be done to review whether this is appropriate for Wandsworth. We will investigate the PTAL ratings for the Opportunity Areas and if there are any sites below car-free threshold within the Opportunity Areas then it is the Council's position that such sites may benefit from residential car parking.</p> <p>It is considered that LP51 could clarify that parts D and E are for residential car parking and an amendment could be made to clarify this.</p> <p>LP51 Parking, Servicing and Car Free Development A (8) sets out that office parking should follow the London Plan which requires it to be car-free. This does not need to be duplicated in the supporting text.</p>	<p><u>2021), and this will provide a basis for the definition of key workers.</u></p> <p><u>The Council's priority is to help those key workers on lower incomes, with a place of work away from their own home, to travel to work where public transport options are more limited. This support, therefore, is more likely to be appropriate where developments are providing affordable housing in locations with poor PTAL ratings.</u></p> <p>Amend wording in policy LP51 as follows:</p> <p>'D. Car-free <u>residential</u> development will be required where:</p> <p>...</p> <p>E. Low car <u>residential</u> development will be required where:'</p>	

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	reference to London Plan Policy T7 in paragraph 20.29.						
35	<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. <u>To avoid confusion, it would be better to refer to Wandsworth Gyratory specifically.</u> Support for highway improvement schemes that increase capacity for general traffic would be contrary to the MTS and London Plan. We note that reference to a further extension of the Northern line beyond Battersea to Clapham Junction has been removed.</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>	588	PPAM/090 PPMM/124 PPAM/091	LP54	<p>LP52 is considered sound but greater clarity could be added to ensure that the removal of the Wandsworth Gyratory is recognised as the particular highway improvement scheme the Council aims to support. There have also been several administrative errors which led to the deletion of two paragraphs (A2 and A3) from LP52 which it is considered could be reinserted as minor amendments. This could also necessitate a small reshuffling of paragraphs to ensure it reads coherently.</p> <p>LP52 A (1) is considered sound but it could be clarified that TfL are a specific stakeholders who should be contacted.</p>	<p>Amend wording in policy LP52 as follows:</p> <p>'A. The Council will promote major transport infrastructure schemes including Crossrail 2, Clapham Junction expansion, the Northern Line Extension to Battersea, improved rail links between South London and Heathrow, suburban rail services, highway improvement schemes <u>the removal of the Wandsworth Gyratory</u>, and new pedestrian and cyclist bridges to be delivered by other parties including Government, TfL, public transport companies and private developers.'</p> <p>Include wording in policy LP52 after part A(1)(c) as follows:</p> <p><u>2. Land will be safeguarded for future transport functions where necessary. New and additional land for transport functions and infrastructure will be sought to address deficiencies in provision and/or to accommodate expected</u></p>	Agreed

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						<p><u>future demand. Financial contributions to public transport improvements and other transport infrastructure can be made in lieu of provision in special circumstance.</u></p> <p><u>3. The Thames and Wandle riversides will be protected as they are key routes for walking and cycling in Wandsworth but also important natural resources. It will be expected of development on riverside routes that:</u></p> <p>B. Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)) and:</p> <p>a. provision is made for riverside walks and access at least six metres wide (Thames) or at least three metres wide (Wandle), and appropriate to the scale of development, along the entire river frontage except for safety, operational or nature conservation reasons;</p> <p>b. any new accesses linking the riverside walk to the surrounding area are at least three metres wide;</p>	

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						<p>c. riverside walks should where possible allow for provision of cycling, ensuring pedestrian safety; and</p> <p>d. the Environment Agency has been consulted for all developments adjacent to a watercourse.</p> <p><u><i>B. Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)).</i></u></p> <p>Amend wording in policy LP52 A(1)(c) as follows</p> <p>'consultation has been undertaken with operators, owners and stakeholders <u><i>including TfL.</i></u>'</p>	