

# Wandsworth Local Plan Examination in Public Transport for London (Spatial Planning) – Matter 19 Written Statement

- Are the requirements of the Sustainable Transport policies justified by appropriate available evidence, having regard to national guidance, and local context, and meeting the requirements of the London Plan?

TfL has outstanding objections to aspects of the approach to parking set out in Policy LP5I and accompanying text, which are not consistent with the London Plan, and potentially raise issues of conformity.

## Car free development

Part A2 of the Policy states that *‘Development will be supported where... off street residential car parking is provided and does not exceed the maximum requirements set out in the London Plan with reference to Table 10.3 and any subsequent amendments, and it can be demonstrated that parking on site is the minimum necessary.’* This is supported.

Although Part D1 sets out that car free development will be required where the PTAL is 4 or higher, it does not mention that London Plan Policy T6.1 and Table 10.3 also require car free development in all inner London Opportunity Areas and in Major and Metropolitan Town Centres, and London Plan Policy T6A states that *‘car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport’*. TfL has made representations on this point.

Initially, Council officers stated that the proposed clarification was unnecessary because all sites in Opportunity Areas and Town Centres in Wandsworth would have a PTAL of 4 or higher. However, in negotiations with TfL to agree a Statement of Common Ground, the Council has now stated a position of opposing car free development in Opportunity Areas for sites that have a PTAL below 4, despite recognition that this would be out of step with adopted London Plan policies.

No evidence nor justification has been provided for deviating from London Plan policy, apart from a response in the Statement of Common Ground stating *‘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.’* This suggests a clear divergence from the adopted London Plan. It should be noted that boroughs with similar geographies to Wandsworth have more restrictive parking policies that either align with the London Plan or go further still in restricting parking.

The Council’s reasoning not only lacks an evidence base but is also inconsistent with Part A2 of the Policy which requires London Plan parking standards to be adopted. There is potential for an unhelpful precedent to be set, regarding parking in inner London Opportunity Areas, if Wandsworth adopts a policy that permits parking provision. This would undermine the delivery of housing and result in growth that has impacts on existing residents which cannot be mitigated, e.g. through increases in traffic and congestion as well as a plethora of aspects of quality of life, including: the introduction of more road danger undermining the safety of people walking and cycling, delays to public transport, worsening the environment through greater emissions and noise, as well as reducing the attractiveness of Wandsworth’s places and high streets.

This policy is also likely to jeopardise delivery of the Mayor’s targets for mode shift which are predicated on reducing car parking at new developments. This is because all evidence shows that car ownership is a key determinant of travel behaviours, with Londoners without access to a car at home making 90 per cent of their trips by sustainable modes. Inner London Opportunity Areas present opportunities for car-free development because they are planned around existing or improving sustainable transport networks and are designated as sustainable locations for intensification or higher density development. Vauxhall Nine Elms Battersea forms part of the Central Activities Zone (CAZ) and Clapham Junction is one of the most well connected rail stations in the country. A high proportion of potential development sites in Wandsworth are

located in Opportunity Areas or town centres, as evidenced by the site allocations.

We therefore request that, to ensure soundness, Part D1 of Policy LP51 should be amended to read ‘Car free development will be required where the PTAL is 4 or higher, **or the site is in a Major or Metropolitan Town Centre or falls within the Opportunity Areas at Clapham Junction or Vauxhall, Nine Elms, Battersea.**’ Alternatively, it could simply state that ‘**Car free development is required in the locations specified in Table 10.3 of the London Plan.**’ This would be consistent with Part A2 of Policy LP51.

### **Parking for key workers**

TfL had also objected to the insertion of wording in paragraph 20.36 that states: ‘*The Council supports the provision of car parking spaces for key workers within new developments.*’ This was a late addition to the local plan, having been inserted at Regulation 19 stage without a clear justification or underpinning evidence. As drafted, the new paragraph conflicted directly with Policy LP51 and London Plan parking policies which aim to restrain parking at new developments.

The wording included at Regulation 19 stage referred to a list of key workers which was, at the time, being prepared by the Mayor of London in connection with the allocation of intermediate housing. Now that this has been published, modifications are proposed by the Council in the TfL Statement of Common Ground.

The amended paragraph now refers to the Mayor of London’s list of key workers (contained within the Housing Policy Practice Note, ‘Allocating intermediate homes to London’s key workers’, December 2021), and states that this will provide a basis for the definition of key workers. However, the list of key workers in the Housing Policy Practice Note, was not intended to relate to car parking and was produced for the sole purpose of allocating intermediate homes as the title of the note makes clear.

The definition of key workers is drawn widely so that 30.1 per cent of Wandsworth’s resident working population are classified as key workers (Figure 1 of the Note). This includes large numbers of workers who would normally be

expected to travel by public transport, such as: national and local government administrative workers, chartered accountants, and finance officers.

Although TfL is open to considering an evidence-based policy regarding the allocation of parking in new developments, this should be in the context of the maximum standards set out in the London Plan, including the fact that some new developments will be car free. Given how little of the housing supply in London is new developments, there is ample existing parking in London to cater for people who need to own a car. This approach was tested at the London Plan examination and found sound. What is more, car free development is the norm in large parts of inner London, irrespective of PTAL, and this approach has been found sound throughout other local plan examinations.

As drafted at Reg. 19, paragraph 20.36 was open-ended and could lead to an over-provision of car parking, thus undermining the operation of Part A2 of Policy LP51 and London Plan Policy T6. However, in the TfL Statement of Common Ground, Wandsworth Council has agreed to amended wording of paragraph 20.36. This would confirm that the prioritisation of parking for key workers would only apply within the parameters of Policy LP51 and where parking is to be provided at new housing developments. Subject to this amended wording, TfL is satisfied that paragraph 20.36 no longer conflicts with London Plan parking policies.

**• LP52 (Public Transport and Infrastructure) - Is greater clarity required regarding the Council's position relating to the Wandsworth gyratory system?**

Although it is for the Council to set out their position, TfL can provide an update which reflects the latest status of the project following the recent TfL funding settlement with the Department for Transport.

The Wandsworth Town Centre scheme will remove the one-way gyratory, replacing it with a two-way road layout. TfL continues to work with Wandsworth Council in drafting a robust business case to deliver an excellent case for change to the Department for Transport (DfT) to secure essential funding. Through the work on the business case, TfL has identified the need for further modelling work to optimise benefits for all road users, and to fulfil the requirements of the DfT's Major Roads Network (MRN) programme. Once

funding has been secured from the DfT MRN programme, TfL will take forward a further engagement with the public. The target date for submission of the business case is later this financial year.

TfL will continue to work with Wandsworth Council to ensure that Healthy Streets improvements are delivered, as development sites in Wandsworth town centre come forward.

- **Do policies LP49 to LP52 provide a clear direction as to how a decision maker should react to a development proposal?**

As stated above, there are inconsistencies both within Local Plan Policy LP51 (Parking) and with the parking policies in the London Plan (which forms part of the Development Plan). These inconsistencies could result in confusion for the decision maker.

When considering a residential development proposal in PTAL 3 in an Opportunity Area or a Major or Metropolitan Town Centre, the London Plan would require car free development. However, the Local Plan is ambiguous on this point, and in their responses to TfL Wandsworth officers have stated that sites below PTAL 4 may benefit from car parking which, it is acknowledged, would be contrary to the London Plan.

For clarity, consistency and soundness, Part D1 of Policy LP51 should be amended to read **‘Car free development will be required where the PTAL is 4 or higher, or the site is in a Major or Metropolitan Town Centre or falls within the Opportunity Areas at Clapham Junction or Vauxhall, Nine Elms, Battersea.’** Alternatively, it could simply state that **‘Car free development is required in the locations specified in Table 10.3 of the London Plan.’** This would be consistent with Part A2 of Policy LP51.