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[by email only]

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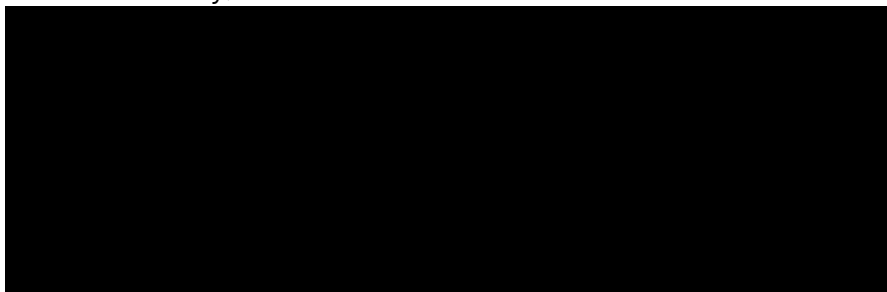
Wandsworth Local Plan Main Modifications

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Transport Trading Limited Properties 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 proposed Main Modifications to Wandsworth Local Plan. Although we would like the Local Plan to have gone further in a few areas, the amendments made to transport policies and site allocations are positive, and subject to some minor amendments, will ensure overall consistency with London Plan transport policies. We welcome changes to a number of site allocations that no longer require re-provision of car parking.

We have set out a number of detailed comments on the following pages which we hope are helpful. We look forward to continuing to work together to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth.

Yours Sincerely,



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

Reference	Section	Comment
MM93	CJ5, Winstanley / York Road Regeneration Area	We welcome the insertion of a new paragraph in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'Public Transport - Development may need to improve York Road in terms of public transport as well as provide and maintain facilities for sustainable travel include bus standing and turning on site.'</i>
MM101	PUT1, Wereldhave site, 56-66 Putney High Street	We welcome the amended wording of paragraph 7.18 in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'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.'</i>
MM110	TO3, 50 – 56 Tooting High Street, Tooting,	We welcome the amended wording of paragraph 8.34 in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'8.34 Access – The parking and access to the west should be <u>redeveloped</u> retained with public realm enhancements provided for pedestrians.'</i>
MM111	TO3, 50 – 56 Tooting High Street, Tooting,	We welcome the amended wording of paragraph 8.35 in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'Parking – Servicing should take place directly from the Garratt Lane frontage subject to the constraints of the bus bays.</i>
MM140	OUT3, Springfield Hospital, Burntwood Lane / Glenburnie Road,	We welcome the insertion of a new paragraph in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below. <i>'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.'</i>

Reference	Section	Comment
MM143	OUT5, Bridge Lane Medical Group Practice, 20 Bridge Ln, Battersea, London	<p>We welcome the insertion of a new paragraph in response to TfL's Reg. 19 representation and consistent with the Statement of Common Ground with TfL as set out below.</p> <p><i>'Development Consideration 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.'</i></p>
MM238	LP51 Parking, Servicing and Car Free Development	<p>Although we would have preferred wording that better reflected the approach of the London Plan, we welcome amended wording which was agreed verbally at the EiP Hearing in order to address TfL's Reg. 19 representation and written submission on matter 19 regarding the London Plan requirement for car free development in Opportunity Areas as set out in part 2 below. However, the wording should make it clear that car free development will be required where the PTAL is 4 or higher OR in an Opportunity Area to ensure consistency with the London Plan. As drafted it could be read that both conditions 1 and 2 need to be fulfilled which would be contrary to the London Plan. The word OR should be inserted after clause 1 to ensure soundness.</p> <p><i>'D. Car-free development will be required where:</i></p> <ol style="list-style-type: none"> <i>1. The PTAL is 4 or higher. OR</i> <i>2. <u>In an Opportunity Area, unless specific circumstances can be demonstrated where the provision of parking can be justified.</u></i> <i>3. A Transport Assessment can demonstrate that through a combination of walking, cycling, public transport, car club parking, travel plans and other relevant measures that further private car parking is not required. A Transport Assessment shall demonstrate how reductions in the need to travel can be achieved. A Transport Assessment will not be required if the development meets London Plan Parking Standards.</i> <i>4. The appropriate minimum number of disability friendly parking spaces are provided in accordance with the London Plan and any subsequent amendments.'</i>

Reference	Section	Comment
MM239	LP5I Parking, Servicing and Car Free Development	<p>We note amended wording to LP5I E which is consistent with changes to LP5I D.</p> <p><i>'Low car development will be required where:</i></p> <ol style="list-style-type: none"> <i>1. The PTAL is 3.</i> <i>2. A Transport Assessment can demonstrate that through a combination of walking, cycling, public transport, car club parking, travel plans and other relevant measures minimal car parking is all that is required. A Transport Assessment shall demonstrate how reductions in the need to travel can be achieved. A Transport Assessment will not be required if the development meets London Plan Parking Standards.</i> <i>3. The appropriate minimum number of disability friendly parking spaces are provided in accordance with the London Plan and any subsequent amendments.'</i>
MM240	LP5I Parking, Servicing and Car Free Development	<p>Although we would have preferred the paragraph about parking for key workers, inserted at the Regulation 19 stage, to be deleted entirely, we welcome the amended wording in paragraph 20.36. The modification addresses TfL's main concerns that the prioritisation of key workers should only apply to the allocation of car parking where it is provided within the standards and does not support any exceptions from the London Plan parking standards. This position was set out in the TfL Statement of Common Ground and in our written submission on matter 19 where we confirmed that paragraph 20.36 as amended below would no longer conflict with London Plan parking policies</p> <p><u>'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 LP5 I , 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. 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>

Reference	Section	Comment
MM241	LP52 Public Transport and Infrastructure	We welcome amended wording in policy LP52 A.1c ' <i>consultation has been undertaken with operators, owners and stakeholders including TfL.</i> '
MM242	LP52 Public Transport and Infrastructure	<p>We welcome additional wording in policy LP52 after part A.1c '<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 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>We also welcome the separation of part B from the references to Thames and Wandle riversides '<i>B. Development will be expected to meet all Healthy Street objectives (see Policy LP49 (Sustainable Transport)).</i>'</p>