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24 July 2023

Dear Sir/Madam,

Re: Richmond Regulation 19 draft 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 also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Transport Trading Limited Properties (TTLP) – formerly TfL Commercial Development, to reflect TfL's interests as a landowner and potential developer.

Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's draft local plan. As you are aware, the London Plan 2021 was published in March 2021 and now forms part of Richmond's development plan.

We previously responded to the Regulation 18 consultation and are pleased to note that a number of our points have been addressed and so we set out updated comments to reflect these changes in the appendix below.

As previously stated we strongly welcome your aspirations to implement the 20 minute neighbourhood concept, reduce the need to travel and improve the choices for more sustainable travel. In particular, we welcome the ambitions set out in the draft local plan to: decrease car use and achieve mode split targets and implement the Healthy Streets Approach. We are pleased to see the plan's recognition of the importance of active travel and public transport. However, it would be helpful if reference could also be made to achieving the Mayor's Vision Zero ambition for road safety. We note from the consultation statement that you do not believe this is a planning issue. However, a clear ambition provides a justification for requiring road safety measures as part of development proposals and associated highways improvements.

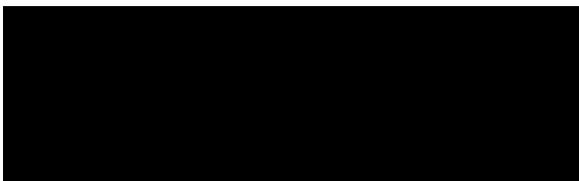
We commend you for adopting London Plan parking standards and the encouragement of car free development. This positive approach was not always reflected in site allocations which referred to car parking requirements or needs in the Regulation 18 draft. We therefore welcome amended wording and additional references to London Plan standards although there are still a few instances where we recommend further amendments to ensure consistency with the London Plan.

We welcome your intention to seek contributions towards active travel improvements and enhanced public transport capacity and infrastructure. We also welcome the safeguarding of transport land, and we support the extension of this safeguarding to existing transport infrastructure as well as future schemes.

In our Regulation 18 consultation response, we recommended that you consider the potential need for a borough-wide strategic transport assessment which would look at the cumulative impact of major site allocations and the expected background growth in travel. We note from the consultation statement that you do not see a need for a strategic transport assessment but have instead referred to pre application advice and use of TfL and national modelling tools in order to take into account cumulative impacts as part of the transport assessment process. We understand that you intend to draw together information that already exists on the likely transport impact of the Local Plan, into a background paper. We welcome this approach and look forward to reviewing the draft background paper.

Our updated responses to specific points in the draft local plan are set out in the attached appendix. We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Richmond and across London.

Yours faithfully,



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Appendix: Specific suggested edits and updated comments from TfL on the Richmond Reg. 19 draft local plan

Section	Track change/comment – Reg. 18	Updated track change/comment – Reg. 19
All Site Allocations	Not applicable	<p>We note that you have added in some useful context on transport/highways for all sites which we welcome. However, we recommend that you state the PTAL as a numeric score and remove any subjective grading such as ‘poor, average or good’. The London Plan no longer uses subjective grading. How a PTAL is valued depends on the context – in a suburban area a site with a PTAL of 3 may be regarded differently to the same score for a site in Richmond or Twickenham town centres. It may also depend on the proposed uses.</p>
Site Allocation 1: Hampton Square Hampton	<p>The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.</p>	<p>Although we welcome the reference to car parking provision in line with London Plan standards, the use of the word ‘retain’ could be misinterpreted as requiring the existing level of provision. London Plan Policy T6 part B states that ‘<i>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, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’).</i>’ Part L states that ‘<i>Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.</i>’ Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: ‘retain minimise car parking</p>

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<p>Site Allocation 5: Car park for Sainsburys, Uxbridge Road, Hampton</p>	<p>Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.</p> <p>The statement that parking is expected to be re-provided for the adjacent food store should be modified by stating that car parking should be minimised as part of any redevelopment consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards. London Plan Policy T6 states that <i>‘Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London’</i>.</p> <p>We note that the existing petrol filling station is expected to be retained or re-provided. London Plan Policy T6 states that <i>‘New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities’</i>.</p>	<p>provision in line with current London Plan standards.’</p> <p>We welcome the additional requirement that bus stop S should be retained.</p> <p>Although we welcome the reference to London Plan standards to be consistent with London Plan Policy T6 we recommend that the wording is amended to read ‘Parking provision to London Plan standards is expected to be provided including reprovision for the adjacent supermarket in line with current London Plan standards.’</p> <p>We welcome the requirement for rapid charging hubs and/or hydrogen fuelling facilities at the retained petrol station.</p>
<p>Site Allocation 12: The Stoop Twickenham</p>	<p>The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</p>	<p>We note the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.</p>
<p>Site Allocation 13: Twickenham Stadium, Twickenham</p>	<p>The allocation states that there is a need to retain sufficient parking, particularly for coaches. This should be rephrased to make it clear that although coach parking should be provided, car parking for employees or spectators should be minimised</p>	<p>We welcome amendments to the wording which removes the word ‘sufficient’ and refers to London Plan parking standards. However, to ensure consistency with London Plan Policy T6 the wording should be amended to read: ‘There is a need to</p>

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	<p>as part of any redevelopment, consistent with stated objectives to reduce car dominance. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.</p>	<p>retain Parking provision particularly for coaches, servicing facilities and space for spectators and related services, should be in line with London Plan standards and should include coach parking and servicing facilities.</p> <p>We welcome the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.</p>
<p>Site Allocation 15: Station Yard, Twickenham</p>	<p>We welcome the reference to bus stands. However, the requirement that bus stands should be retained, redeveloped or re-sited in a suitable location needs to be clarified. If bus stands are redeveloped or re-provided this should only be with the agreement of TfL and standing capacity (as well as drivers' facilities) must be maintained and enhanced.</p>	<p>In relation to the retention of the bus stands we welcome the addition of references to adequate standing capacity and drivers' facilities.</p>
<p>Site Allocation 18: Twickenham Riverside and Water Lane/ King Street</p>	<p>We welcome the suggestion that <i>'There should be a comprehensive approach to servicing and delivery, along with exploring the opportunity to improve the environment of the Embankment through a reduction in car parking.'</i> This could be more directly worded to state that any redevelopment would be expected to remove car parking on the Embankment.</p>	<p>We welcome the clarification that 'Given the high PTAL, a reduction in car parking is sought to improve the environment of the Embankment.'</p>
<p>Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham</p>	<p>N/A</p>	<p>We note the new site allocation for Fulwell Bus Garage and support the requirement to retain the bus garage use on the site.</p>
<p>Site Allocation 24: Richmond Station, Richmond</p>	<p>We welcome the stated aim of a comprehensive approach including transport interchange improvements. We would expect to be closely involved in both the development of the SPD and early discussions about potential redevelopment</p>	<p>We welcome the reference to a partnership approach with Network Rail and TfL.</p>

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	plans. It would be helpful to make this expectation clear in the site allocation.	
Site Allocation 28: Homebase, Manor Road, East Sheen	We welcome the requirement for the retention of the existing bus terminus. It would be helpful to clarify that this comprises both bus standing and drivers' facilities, and that they should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	In relation to the retention of the bus terminus we welcome the addition of references to adequate standing capacity and drivers' facilities. We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network
Site Allocation 29: Sainsbury's, Lower Richmond Road, Richmond	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	The first point of the vision now states that 'Any redevelopment proposal will be required to retain and/or re-provide the existing retail floorspace; associated car parking provision is expected to be re-provided in line with London Plan standards.' Although we welcome the reference to London Plan standards, the London Plan requires retail development in PTAL 5 to be car free and so an expectation that associated car parking should be re-provided is inappropriate., particularly in light of London Plan Policy T6 which states that ' <i>Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.</i> ' The London Plan standard of car free development should be made clearer in the wording. We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network
Site Allocation 30: Kew Retail Park,	The site is adjacent to the Transport for London Road Network (TLRN). We therefore welcome the statement that	The PTAL for a large part of the site is 2 including the main access points and frontage, so we would expect this to be

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Bessant Drive, Kew	<i>'The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.'</i>	used as the baseline rather than the stated PTAL of 0 which is influenced by the lack of access to the rear of the site. We welcome confirmation that 'Car parking provision is expected to be in line with London Plan standards'
Place Based Strategy for Mortlake and East Sheen Other Initiatives	We note the reference to a potential cycle route between Mortlake and East Sheen in TfL's Cycling Action Plan. This is indicative and more work will be required to determine the actual alignment of any cycle route.	
Site Allocation 34: Stag Brewery, Lower Richmond Road, Mortlake	We note the statement that <i>'The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.'</i> Although we support the requirement for bus standing space within the development site, TfL does not support the closure of Avondale Road Bus station. The proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and turning facility at Avondale Road.	We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and standing facility at Avondale Road. To ensure consistency with London Plan Policy T3 the wording should be amended to remove reference to the Avondale Road bus station by replacing the current wording: 'The opportunity to relocate the bus stopping/turning facility from Avondale Road bus station to this site should be investigated, if appropriate, as part of a comprehensive redevelopment' with 'Additional bus standing space is likely to be required within the development site.'
Policy 15. Infill and Backland Development	In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to induce car travel so demand for it should not be described as arising from 'need'. As such,	We welcome removal of the requirement to demonstrate that parking is no longer needed and its replacement with the condition that 'provided any net loss of parking is assessed in accordance with Policy 47 'Sustainable Travel Choices (Strategic Policy)' and Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics

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	<p>reductions in parking can deliver mode shift and reduce the dominance of vehicles in an area. To ensure consistency, this requirement should be deleted.</p>	<p>Management'</p>
<p>Policy 47. Sustainable Travel Choices</p>	<p>We support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However public transport capacity constraints may also apply in higher PTALs and so the wording should make it clearer that there is a potential requirement for contributions to public transport in all areas, regardless of PTAL. The level and type of mitigation will be informed by a multi-modal impact assessment.</p> <p>Part C could refer to implementing measures that are identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach</p> <p>Part H should refer to safeguarding existing transport infrastructure in addition to safeguarding transport schemes.</p>	<p>We reiterate our comments on the need for public transport capacity constraints to be mitigated for developments in higher PTALs. A congested station may have a high PTAL but a contribution to increase station capacity would be both justified under NPPF and the London Plan and necessary for the development to go ahead.</p> <p>We also repeat our request for a reference to an Active Travel Zone Assessment either in part C or accompanying text.</p> <p>We welcome amended wording in part H which now requires safeguarding for transport schemes and infrastructure set out in the London Plan or the Council’s Local Implementation Plan.</p>
<p>23.1</p>	<p>We strongly welcome the borough’s commitment to promoting sustainable travel, decreasing car use, and improving air quality. However, the commitment to decreasing car use could be made more prominent by referring to it in policies. As stated, <i>‘Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved.’</i> We also welcome confirmation that Local Plan policies should be read alongside those in the London Plan and the Mayor of London’s Transport Strategy.</p>	<p>We welcome the inclusion of commitments to promote sustainable travel, decrease car use and improve air quality within Policy 47 itself.</p>

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23.2	When referring to the Council’s sustainable transport mode split targets, it is helpful to clarify that developments will need to demonstrate how they are contributing to achievement of those targets.	We welcome the addition of the final sentence confirming that ‘Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.’
23.10	When referring to London Plan minimum standards for cycle parking, it is helpful to add that developments that exceed minimum cycle parking provision will be encouraged.	We welcome amended wording which now clarifies that ‘Cycle parking should, at least, be provided in accordance with the minimum standards in the London Plan.’
23.21	We welcome safeguarding of bus garage facilities, but it should be made clear that in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities.	We welcome amended wording which recognises TfL’s role and states that ‘The loss of existing bus garages will be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, and confirmed by Transport for London, that it is operationally no longer needed or enhanced reprovision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative’
Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	<p>We strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application.</p> <p>In part F we welcome the encouragement of car free developments in PTAL 3 or above.</p> <p>In F5, where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent parking controls).</p> <p>In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good</p>	<p>TfL guidance on Parking Design and Management Plans is due to be issued for consultation and so a requirement should be added to the policy or accompanying text to require submission of a Parking Design and Management Plan where parking is provided.</p> <p>In F5 we welcome additional wording which states that ‘In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one.</p>

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	<p>connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part G, there may be a need to consider on street disabled persons’ parking spaces on constrained sites that are otherwise suitable for car free development. We can provide advice on how this works in other boroughs if helpful.</p> <p>In part H, where there is physically no possibility of accommodating short stay cycle parking on site, on street provision may need to be considered as set out in paragraph 23.35.</p> <p>In part I, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs.</p> <p>In part L, it is helpful to refer to TfL guidance on Delivery and Servicing Plans.</p> <p>In part M, to ensure consistency with London Plan and TfL, it would be helpful to refer to Construction Logistics Plans rather than Construction Traffic Management Plans.</p>	<p>We note that no changes have been made to F8</p> <p>We note that no changes have been made to part G</p> <p>In part H we welcome reference to provision of on street cycle parking where short stay cycle parking cannot be accommodated on site</p> <p>We note that no changes have been made to part I</p> <p>In part L we welcome the addition of a reference to TfL guidance</p> <p>In part M we welcome amended wording which now refers to Construction Logistics Plans</p>