



TfL ref: 18/4782

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[by email only]

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17 December 2018

Dear Sir/Madam,

Re: Merton Local Plan 2020 and Future Wimbledon Masterplan – combined response

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 TfL 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 Merton Local Plan 2020 and the Future Wimbledon Masterplan. We welcome and support proposals to increase density in Merton, with density optimised taking into account public transport connectivity and capacity, and access to town centre amenities and services. The step-change in connectivity facilitated by Crossrail 2 will help unlock significant growth potential in Wimbledon, and enable development to be delivered successfully at higher densities.

The draft London Plan was published in December 2017 and was open for public consultation until March 2018. Following the consultation, a revised draft was published in August 2018 showing Minor Suggested Changes made in response to consultation comments. The draft London Plan is a material consideration in assessing local policy and determining planning applications.

Merton Local Plan 2020

TfL supports Merton's vision to embed health and wellbeing into development. These strategic objectives promote creating streets that encourage walking, cycling and public transport, that balance the needs of all road users and support growth taking into account public transport accessibility, character and infrastructure.

We note that the Merton Local Plan 2020 does not include a separate transport section. This does not reflect the strategic importance of transport. We strongly recommend the inclusion of a transport section with clear policies.

The policies and supporting text should make specific reference to the Mayor's Vision Zero for road casualty reduction.

It is important that the borough's growth aspirations incorporate Mayoral policy objectives and reflect the Healthy Streets Approach in line with the draft London Plan and Mayor's Transport Strategy.

Proposals for new development should be supported by a Transport Assessment, developed using the latest TfL Best Practice Guidance. Applications should also be accompanied by a Travel Plan, Construction Logistics Plan, Delivery and Servicing Plan, and Parking Design and Management Plan in accordance with TfL guidance.

Future Wimbledon Masterplan

We broadly support the higher density development shown as part of the Masterplan. Future development should align with Policy GG2 in the draft London Plan which seeks to intensify the use of land and promote higher density development, particularly in areas well-connected by public transport.

The Masterplan identifies ten priorities to guide development in each of the Masterplan neighbourhoods. Of most relevance to TfL are:

- Greening Wimbledon
- Public Space
- Traffic Intervention
- Transport Interchange; and
- Development over the railway.

The Traffic Intervention priority highlights the requirement for further work to support traffic management and traffic reduction schemes. TfL should be involved in any transport study produced to support these schemes. Any proposals in the Future Wimbledon Masterplan which seek to alter the way general traffic currently accesses and travels through Wimbledon town centre should be modelled and assessed to fully understand local and wider transport network impacts. This should be undertaken before any preferred proposals for changing the operation of the local transport network are put forward. We therefore strongly support the use of an Opportunity Area Planning Framework (OAPF) to provide a more detailed policy framework for development in Wimbledon. TfL and Crossrail 2 should be engaged from an early stage when this is produced.

The Masterplan area is well connected by public transport, with a Public Transport Access Level (PTAL) of 5 to 6b. In accordance with the draft London Plan, all development in the Masterplan area should be car-free, excluding disabled persons parking and operational parking. A map showing the PTAL of the Masterplan area should be shown. All development will be expected to meet or exceed draft London Plan long-stay and short-stay cycling parking standards.

Wimbledon / Colliers Wood / South Wimbledon Opportunity Area

Opportunity Areas are expected to aspire to more ambitious mode share targets and to meet or exceed indicative guidelines for new homes and jobs as set out in the draft London Plan to fully realise their growth potential. The Merton Local Plan 2020 and Future Wimbledon Masterplan should set out how growth will be phased in order to maximise the benefits of major infrastructure improvements such as Crossrail 2 and the Sutton Link.

Crossrail 2

Crossrail 2 is a proposed new railway that will bring about transformational change along its corridor and across Merton, unlocking significant growth potential and improving public transport connectivity and capacity. Crossrail 2 needs a more explicit introduction in the Merton Local Plan 2020, ideally in a new chapter on transport. The Merton Local Plan 2020 should be clear that the scheme has three proposed stations in the borough at Wimbledon, Raynes Park and Motspur Park.

We recognise the need for a long term vision for the development of Wimbledon town centre, and support the opportunity that the Future Wimbledon Masterplan offers for a more planned and coordinated approach to growth and investment. A key objective of Crossrail 2 is to integrate new transport infrastructure into local areas and create high-quality places and support regeneration. We generally support the aim to improve the public realm in Wimbledon town centre. Consideration should be given to the phasing of public realm improvements near any future Crossrail 2 construction sites to minimise abortive investment.

Land around Wimbledon station has been identified and safeguarded in the Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015 (see Appendix D). Safeguarding is an established part of the planning system which protects the future possibility of a railway being built and ensures that anything built within the boundaries identified in the directions allows for the future construction of Crossrail 2. TfL will continue to work with Government to make the case for Crossrail 2.

Sutton Link

TfL supports the inclusion of references to the Sutton Link but would like to ensure that these include the possibility that it could be provided by tram or bus rapid transit. Please see Appendices for detailed comments relating to the Sutton Link.

We have set out a number of comments and proposed changes on the following pages which we hope are helpful. Appendix A provides detailed comments on the Merton Local Plan 2020 and Appendix B provides detailed comments on the Future Wimbledon Masterplan. We look forward to continuing our work together in drafting the final documents. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth in Merton and across London.

I trust that the above provides you with a better understanding of TfL's position on the Merton Local Plan 2020 and the Future Wimbledon Masterplan. Please do not hesitate to contact me should you have any queries or clarifications about these comments.

Yours faithfully,

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Appendix A: Specific suggested edits and comments from TfL on Merton Local Plan 2020

Section	Track change/comment
Throughout	All references to Crossrail 2 should spell out the scheme in its entirety and not use “CR2” or “Crossrail2”.
Key Diagram	Please amend text: “ London Underground Stations” “ London Trams Stops” “Northern E line U nderground” “District E line U nderground” “ London Trams L ine” “ Tram extension options-Proposed Sutton Link ” “Opportunity Areas P lanning F rameworks”
Vision and Strategic Objectives	Please identify Crossrail 2 in the Spatial Vision and supporting diagrams
Vision and Strategic Objectives	Please amend paragraphs 1.21, 1.26 and 1.28 to recognise that the expectation is that the opening year of Crossrail 2 will be during the mid-2030s, Our experience with the Elizabeth line shows that a significant amount of development as a result of the scheme has occurred in advance of its opening.
Strategic objective 1: Healthy Places	Please add extra bullet point: “ e. Using the Healthy Streets Approach to prioritise health in all planning decisions. ” This should be strengthened by including the Healthy Streets ‘wheel diagram’ (see Appendix C).
Strategic Objective 3: Housing	Please add extra bullet point: “ c. Ensuring that development makes the most efficient use of land and is designed at the optimum density, considering site context, connectivity by walking, cycling and public transport, and access to amenities and services. ”

Section	Track change/comment
Strategic Objective 5: Infrastructure	Please amend bullet point: “c. Developing improvements to the public highway that balance the needs of all road users using the Healthy Streets Approach ”. Please strengthen this by including the Healthy Streets ‘wheel diagram’ (see Appendix C).
Strategic Policy HW2.1	Please amend policy HW2.1 (i): “Ensuring that neighbourhoods are well designed and promote healthier living, active living and adopt active aging approaches. Streets should be designed using the Healthy Streets Approach to encourage active travel. ”
Policy N3.1 Colliers Wood	We support identification of Colliers Wood as a future potential District centre. In order to successfully classify Colliers Wood as a town centre, it is important that a strategy is implemented that commits to reducing reliance on car travel, creates public realm improvements, encourages walking, cycling and public transport use, and integrates Colliers Wood into the surrounding area.
Policy N3.1 (g)	Please amend text: “g. Supporting development which helps to optimises density housing potential and quality, traffic flow and the, improves the public realm and helps manage the movement of people and goods; ”
Policy N3.1 (h)	Please amend text: “h. Supporting improvements to the Wandle Trail and other transport infrastructure that will help to reduce manage road congestion and improve the public realm, particularly for pedestrians and cyclists;
Policy N3.2 paragraph 3.2.8	Please amend text: “The council will continue to campaign for increased rail services, particularly at Mitcham Eastfields, and will continue to support the Merton-Sutton Tram link. This would improve the destinations reachable from Mitcham via the existing London Trams network and provide interchange options to connect to stations down to Sutton. ”
Policy N3.3 Morden	We support optimising density in the Morden Regeneration Zone and the Wider Morden Town Centre Area. TfL should be consulted at the earliest stage for planning applications in this area to best assess any impact on TfL services.
Policy N3.3 (l)	This policy states that Merton would like to improve “connectivity between the Underground depot and Morden South Station” in order to support transport improvements. TfL requests clarity on this policy as the current wording is vague.

Section	Track change/comment
Policy N3.3 paragraph 2.3.36	Please amend text: “TfL is currently working to develop a direct, high capacity transport link towards an extension of the existing London Trams network between Wimbledon and Sutton, via Morden, known as the Sutton Link. This could be provided by a tram or by bus rapid transit. A consultation will begin at the end of October was held in 2018 with three potential route options for a new link, with one passing along the eastern edge of the Morden Regeneration Zone. The council will continue to work with TfL and Sutton Council to explore these route options and the potential for a Morden interchange between the tram Sutton Link and London Underground. ”
Policy N3.3	Please amend text: “ create healthier streets with better use the Healthy Streets Approach to improve connectivity and permeability for pedestrians and cyclists;” Please amend text: “reduce traffic dominance, and improve walking, cycling and vehicle links public transport into and around the town centre;”
Policy N3.4 Raynes Park	Crossrail 2 is generally supportive of Policy N3.4. New infrastructure works required at Raynes Park station will offer the opportunity to enhance Policy N3.4 through providing opportunities for public realm improvements and investment.
Policy N3.6 paragraph 3.6.13	We generally support policy N3.6 and its ambitions to promote and strengthen its role as a town centre. As identified in paragraph 3.6.13, Crossrail 2 will be ‘a key driver of change in Wimbledon’. We agree that Crossrail 2 will ‘open up new opportunities for creating new public space around the station and improving links across the railway lines’ however there are wider opportunities that exist and should be mentioned. We suggest the addition of the following text to the end of paragraph 3.6.13: “ Options currently being considered for Crossrail 2 could provide the ability to deliver improvements at Wimbledon station which can improve connectivity across the railways, enable Over Site Development, and offer opportunities for wider reorganisation of all modes of transport. ”
Policy N3.7 (i)	Please amend text: “i. Seek improvements to the transport accessibility to and within the area, including supporting the Sutton Link project which is consulting from October 2018 on the provision of a tram or bus rapid transit link with route options connecting Wimbledon, South Wimbledon or Colliers Wood with Sutton Town Centre. ”

Section	Track change/comment
Policy O8.4 (h)	<p>Please amend text: “h. Expect proposals for new and replacement trees, hedges and landscape features to consist of where possible appropriate native species to the UK but accepting that in future proofing the natural environment against climate change non-native trees and plants must also be considered;”</p> <p>Please add the following as supporting text: “With longer, hotter, drier summers and milder winters with more intense periods of rain we must also look to future proofing our natural environment and consider more non-native trees and plants which will cope with these more extreme conditions. This is particularly pertinent to urban areas where more extremes of climate change can be experienced.”</p>
Site Mo4 Morden Regeneration Zone	<p>Please amend text: “Sutton Link – potential tram extension this scheme is being developed to provide a direct, high capacity transport link (provided by tram or bus rapid transit) with one of the proposed options running between South Wimbledon and Sutton along the eastern edge of the site.”</p>
Sites RP3 Burlington Road, Tesco, RP4 Bushey Road and RP8 West Barnes Library	<p>Site allocations RP3, RP4 and RP8 are all located outside the Limits of Safeguarding for Crossrail 2 as set out in the 2015 Safeguarding Directions. In the event that powers to deliver Crossrail 2 are approved then these sites or parts of these sites, have been identified as land that could be required to deliver and/or construct Crossrail 2. We therefore suggest that Merton continue to engage with Crossrail 2 around how these sites could be required and, if they are, could be brought back into use and appropriately phased in order to maximise the overall benefits.</p>

Section	Track change/comment
Site RP7 Rainbow Industrial Estate	<p>To accommodate Crossrail 2, new infrastructure will be required at Raynes Park Station, which is likely to involve lengthening of platforms to accommodate the new and longer Crossrail 2 trains. As a result, additional land outside of the railway boundary may be required. Site RP7 has not been safeguarded for Crossrail 2 (and/or by the DfT) under the 2015 Safeguarding Directions. However, in the event that powers to deliver Crossrail 2 are approved this site has been identified as land that may be required as part of a worksite necessary to deliver the Crossrail 2 scheme. Site allocation RP7 could therefore compromise options for delivery that the Crossrail 2 project is able to take forward. With this considered, we suggest amending text on page 172 to as follows:</p> <p>“The site is adjacent to a Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2, however the site has not been safeguarded by Crossrail 2 under the 2015 Safeguarding Directions. If this land is required to accommodate the scheme, and safeguarded at a later date, this may cause delay to delivery of the whole site development although could offer longer term redevelopment opportunities in the latter part or outside of the plan period.”</p>

Appendix B: Specific suggested edits and comments from TfL on Future Wimbledon Masterplan

Page	Track change/comment
40	Please add text below the subsection on Crossrail 2: “Proposed Sutton Link Further improves connectivity by providing a tram or bus rapid transit link between Wimbledon and Sutton town centre.”
53	Please amend text: “The tram has transformed travel opportunities in the area and provides the potential for further growth in homes and jobs. The proposal to extend the tram to Sutton Town Centre, proposed Sutton Link would improve connectivity between Wimbledon, Sutton town centre and potentially beyond to the proposed Cancer Hub, would improving public transport accessibility to the town centre and St Helier Hospital, and supporting the delivery of at least 10,000 new homes. Depending on the final option this could be direct or via interchange from the existing Wimbledon tram at Morden Road or Belgrave Walk. Options are being consulted on with the aim of submitting an application for planning consent in 2020.”
54	Please amend text: “The masterplan is not wholly reliant dependent on Crossrail 2, but the vision set out in the document could only be fully realised through improvements to Wimbledon Station and the wider transport network. but sets out a vision for how Crossrail 2 could integrate with the town centre and deliver new infrastructure, vital to support growth. Options currently being considered for Crossrail 2 could provide the opportunity to increase transport capacity, provide a catalyst for significant inward investment and provide new development sites.” Crossrail 2 could bring transformational opportunities to Wimbledon. While the vision is not wholly dependent upon planned transport infrastructure (such as Crossrail 2) coming forward, it can only be fully realised through improvements to Wimbledon station and the wider transport network. This amendment provides clarity and further detail on exactly what opportunities Crossrail 2 can bring to Wimbledon town centre.
66	TfL recommends that the priorities reference promoting active travel, public transport and the Vision Zero approach to eradicating deaths and serious injuries from roads.
68	The priorities of greening Wimbledon to improve the environmental quality of streets and quality public spaces both follow the Healthy Streets Approach. Although TfL would recommend that a direct reference is made to the Mayor’s Healthy Streets Approach. We suggest reinforcing this through use of the Healthy Streets ‘wheel diagram’ (see Appendix C).



Appendix C: Healthy Streets Wheel



Source: Lucy Saunders

Appendix D: Crossrail 2 safeguarding in Wimbledon





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28 January 2019

Dear Sir/Madam,

Re: Merton Local Plan 2020 – transport chapter – addendum to Transport for London response dated 17 December 2018

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 TfL Property to reflect TfL's interests as a landowner and potential developer.

Thank you for giving TfL the opportunity to comment on the transport chapter of the Merton Local Plan 2020. The comments presented in this letter refer only to the transport chapter of the Merton Local Plan 2020, which was not presented as part of the original online consultation material. For TfL's response to the rest of the draft local plan, please see our previous letter dated 17 December 2018.

We have set out a number of comments and proposed changes on the following pages which we hope are helpful. TfL generally supports the policies set out in the transport chapter of the Merton Local Plan 2020, and in particular welcomes the proposed approach to cycle parking and car parking. We also welcome Strategic Policy T6.4, which aligns with the Healthy Streets Approach set out in the Mayor's Transport Strategy. TfL will be happy to help in implementing this policy and we look forward to working together on it.

Appendix A provides detailed comments on the transport chapter. We encourage using the Healthy Streets diagram (Appendix C) to further support the policies set out in the Merton Local Plan 2020.

Proposals for new development should be supported by a Transport Assessment, developed using the latest TfL Best Practice Guidance. We have recently updated our approach to Transport Assessments to reflect the Healthy Streets Approach, and are planning to similarly update Travel Plans, Delivery and Servicing Plans and TfL preapplication services to better reflect Vision Zero and the Healthy Streets Approach.

We welcome the identification of Crossrail 2 in the supporting text of Policy T6.8 and suggest that Crossrail 2 needs a more explicit introduction in this chapter. This introduction should highlight the potential transformational opportunities that the scheme could bring to the borough both during and beyond the local plan period. Through significant improvements to transport capacity and connectivity, there is opportunity to unlock development and plan for significant growth and intensification in Merton.

We look forward to continuing our work together in drafting the final documents. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth in Merton and across London.

I trust that the above provides you with a better understanding of TfL's position on the transport chapter of the Merton Local Plan 2020. Please do not hesitate to contact me should you have any queries or clarifications about these comments.

Yours faithfully,

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Appendix A: Specific suggested edits and comments from TfL on the transport chapter of the Merton Local Plan 2020

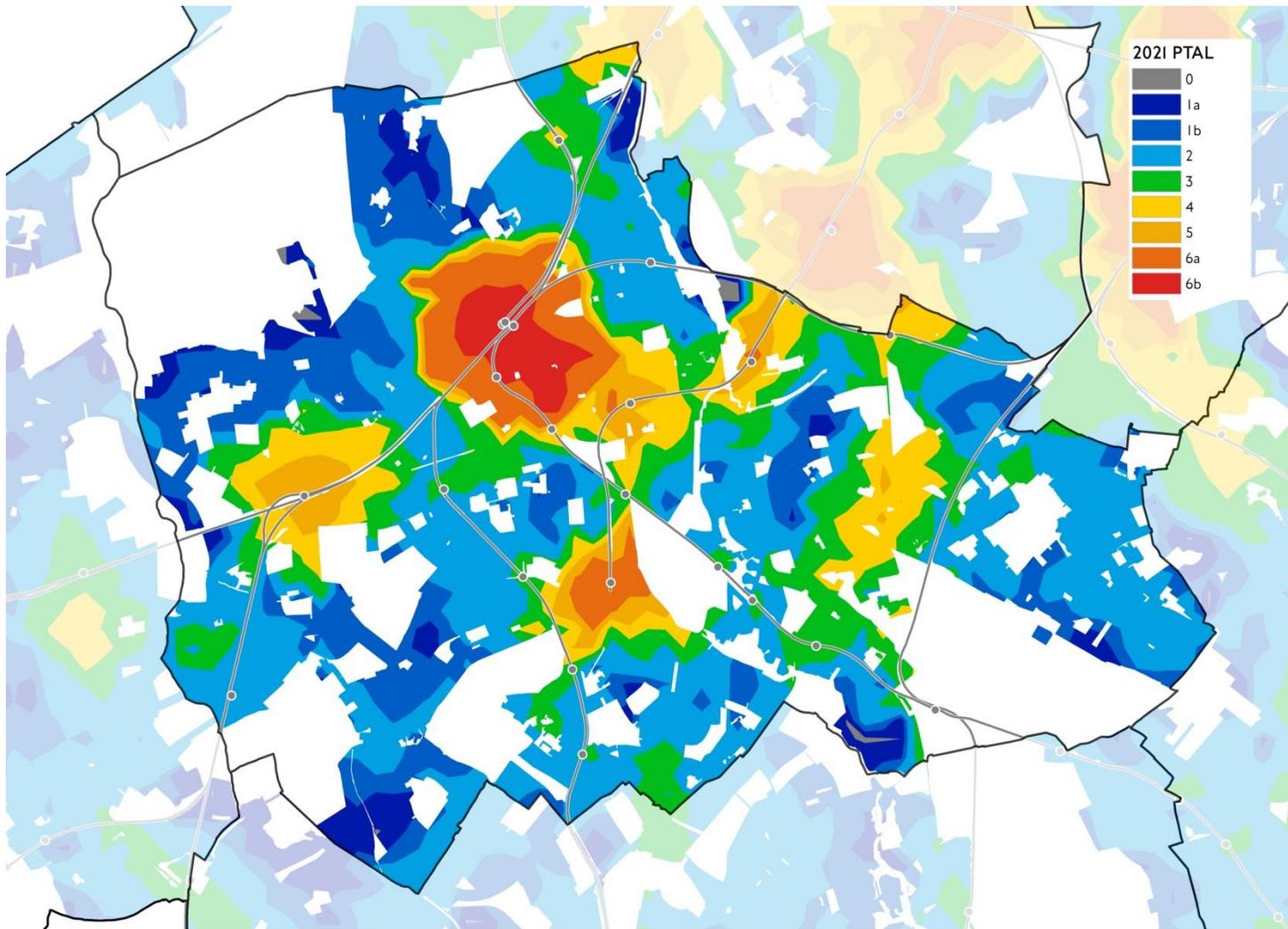
Section	Page	Track change/comment
Merton Transport connectivity diagram	6-13	Please amend text: “London Underground Stations” “London Trams Stops” “Northern Line Underground” “District Line Underground” “London Trams Line” “ Tram extension options Proposed Sutton Link” “Opportunity Areas Planning Frameworks ”
6.4.1	6-15	We welcome the recognition of the problems with streets dominated by car parking. Controlled Parking Zones can help manage demand for car parking. Fewer cars are parked on streets in CPZs, thereby protecting residents’ amenity. TfL can help with introducing and implementing CPZs.
Merton PTAL map	6-18	Please see Appendix B for a map of Public Transport Access Level (PTAL) in Merton. This map shows PTAL while excluding Green Belt, Metropolitan Open Land and other open space which is non-developable. This shows that PTAL can be thought of differently, for example that parks, golf courses and other open space generally are not necessarily able to have public transport running through them and enables planners to focus on improving access to public transport in more densely developed parts of the borough.
6.5.4	6-20	TfL strongly supports the proposals to convert parking spaces to cycle parking and green infrastructure. We also welcome the proposal that the Council will support mobility services and app-based sharing systems only when these do not undermine existing transport services.

Section	Page	Track change/comment
Policy T6.6 c	6-22	Please amend text: “Development proposals will be expected to demonstrate their impact on the transport network through a Transport Assessment in accordance with TfL’s latest online guidance and adhere to Transport for London Guidance for Planning Applications.”
Policy T6.6 c	6-22	Please amend text: “[...] developers will also be expected to provide an outline Construction and Logistic Plan, in accordance with TfL’s latest online G guidance [...]”
Policy T6.6 f	6-23	Please amend text: “Development should ensure Travel Plans accompany all significant development in accordance with TfL’s latest online guid ance elines. ”
6.6.4	6-23	<p>Some locations in London that are PTAL 2 are within walking distance of local destinations, town centres, and other amenities and services. These areas should not be considered on the whole to be ‘poor’. Furthermore, in a city where cycling is commonplace, areas of PTAL 2 are not ‘poorly’ connected and can sometimes enable safer, more comfortable cycling on quieter roads, which enables access to amenities and enables development with low or no cars depending on context. Using the Healthy Streets Approach, TfL hopes to enable everyday cycling that improves local connectivity throughout London.</p> <p>We suggest adding reference to Time Mapping (TIM), which is available as part of WebCAT (Web-based Connectivity Assessment Toolkit). TIM shows travel times from a given location for different modes of transport and can act as a complement to PTAL for showing connectivity to various destinations.</p>

Section	Page	Track change/comment
Policy T6.7	6-25	<p>TfL strongly supports permit free development along transport corridors and in places that are better connected by public transport. We suggest considering introducing new/expanded CPZs to enable permit free development, rather than only considering permit free development where CPZs are already in place.</p> <p>We suggest that the implementation of more CPZs is linked to improving street environments, enabling existing residents to park in ways that are safer for all road users, and addressing the dominance of vehicles parked on the streets around the permit free development.</p> <p>We suggest amending Policy T6.7d to recognise the potential to consolidate retail and leisure parking to make better use of land and to release space for other development or for cycle parking and green infrastructure.</p>
6.7.3	6-26	TfL supports the requirement for developers to provide storage and collection solutions to accommodate deliveries at all times of the day and reduce missed deliveries.
6.7.5	6-26/27	TfL strongly supports the approach to car clubs as set out in section 6.7.5.
6.7.8	6-27	The approach to car parking set out in the draft London Plan is that car parking spaces in communal parking facilities should be leased to residents and not sold. Please amend section 6.7.8 to reflect this approach.
Policy T6.8 a	6-29	There appears to be inconsistency between a(i) and a(ii) – if a site no longer serves any operational need as set out in a(i), then there should be no need to ensure alternative provision as set out in a(ii). Could you please provide clarification on this?

Section	Page	Track change/comment
Future transport infrastructure improvements	6-32	<p>We welcome the identification of Crossrail 2 in this diagram. The diagram is ambiguous and suggests that there is a proposed Crossrail 2 station at Haydons Road – please amend the diagram to show that the scheme has proposed stations within Merton at Wimbledon, Raynes Park and Motspur Park only.</p> <p>Please amend text:</p> <p>“London Underground Stations”</p> <p>“London Trams Stops”</p> <p>“Northern Line Underground”</p> <p>“District Line Underground”</p> <p>“London Trams Line”</p> <p>“Fram extension to Sutton-Proposed Sutton Link”</p>

Appendix B: Public Transport Access Level (PTAL) map of Merton





Appendix C: Healthy Streets Wheel



Source: Lucy Saunders