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1 February 2021

Dear Sir/Madam,

Re: Merton Draft Local Plan – stage 2a consultation

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 do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by 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 as part of the stage 2a consultation on Merton's Draft Local Plan.

The Mayor first published his draft new London Plan for consultation on 1st December 2017. Following examination, the Panel's report, including recommendations, was issued to the Mayor on 8 October 2019 and the Intend to Publish version of the London Plan was published on the 17 December 2019. The Mayor has formally approved a new London Plan; the Publication London Plan, which has been prepared to address the Secretary of State's directions of the 13 March 2020 and 10 December 2020 in his response to the Intend to Publish Plan. The Publication London Plan and its evidence base are now material considerations and have significant weight. Publication of the final version of the new London Plan is anticipated before the end of the financial year, at which point it will form part of Merton's Development Plan and contain the most up-to-date policies.

The approach of the Local Plan should be developed in line with relevant draft 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, 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.

We welcome the broad approach of the Draft Local Plan where it addresses these issues. TfL generally supports the policies set out in the transport chapter of the Merton Local Plan 2020, and in particular strongly welcomes the proposed approach to cycle parking and car parking. We have set out a number of comments and proposed changes on the following pages which we hope are helpful.

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.

Please do not hesitate to contact me should you have any queries or clarifications about these comments.

Yours faithfully,

Josephine Vos | Manager
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Appendix A: Specific suggested edits and comments from TfL on the Draft Merton Local Plan stage 2a

Section		Track change/comment
Colliers Wood		
CW1		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.
CW2		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24. As noted, it is within the consultation zone for the Northern line tunnels and so London Underground Infrastructure Protection should be fully consulted regarding any sub surface works.
CW3		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24. As noted, it is within the consultation zone for the Northern line tunnels and so London Underground Infrastructure Protection should be fully consulted regarding any sub surface works.
CW4		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24. As noted, it is within the consultation zone for the Northern Line tunnels and so London Underground Infrastructure Protection should be fully consulted regarding any sub surface works.
CW5		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.
Mitcham		
M11		As noted, the site is adjacent to tram tracks and, as such, consultation will be required with London Trams.

Section		Track change/comment
MI8		As noted, the site is adjacent to the London Road bus lane. Any negative impacts on bus operations, including during construction, should be minimised and mitigation provided.
MI12		The site provides bus drivers' facilities which must be retained and ideally enhanced as part of any redevelopment of the site. The site is close to the London Road bus lane. Any negative impacts on bus operations including during construction should be minimised and mitigation provided.
Morden		
3.3.26		<p>This paragraph needs to be updated to reflect the current status of the Sutton Link project: <i>'Work on the Sutton Link project was paused in July 2020 as it has not proved possible to identify the funding needed to deliver the scheme. If circumstances change and new funding opportunities emerge then the case for taking the scheme forward will be reviewed.'</i></p> <p>The extension of the tram network should be referred to as between Merton and Sutton, and the preferred route would not go via Morden town centre, so this should be removed.</p> <p>The second part of the paragraph should be reworded to state that the preferred route runs close to the Morden Regeneration Zone (i.e. at the Central Road roundabout). It could then state that the council will continue to work with TfL to explore how best the route between the regeneration zone/town centre and the proposed tram route could be enhanced to provide a good link between the town centre and the tram network towards Sutton.</p>
Mo4		We welcome the requirement for suitable alternative bus stand facilities which should be designed and located to ensure there is no loss of capacity or operational efficiency. The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.
Mo5		The site is close to the A24 which forms part of the TLRN. No new access or servicing should take place from the A24.

Section		Track change/comment
Mo6		TfL welcomes application of the 'Agent of Change' principle to take account of the adjacent London Underground depot.
Raynes Park		
N3.4/3.4.14		<p>TfL welcomes the references to Crossrail 2 and the commitment to collaborative working. Please note the Crossrail 2 project update which is available on the Crossrail 2 website and states that:</p> <p>'The funding agreement with the Government of 31 October 2020 includes a commitment by TfL in relation to Crossrail 2 that TfL "prioritises safeguarding activity and brings an orderly end to consultancy work as soon as possible. DfT will support such safeguarding activity for this project as required." We will work to help the Secretary of State refresh the safeguarding directions in order to safeguard the scheme's latest proposed route from future developments. We are in discussion with DfT on the likely timetable for this work. We will also continue to work with stakeholders whose developments are affected by the safeguarding so that we can continue to protect the route until such time as the railway can be progressed. Given TfL's current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London's growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right'.</p>
RP3		The site is close to the A3 which forms part of the TLRN. No new access or servicing should take place from the A3.
RP4		The site is close to the A3 which forms part of the TLRN. No new access or servicing should take place from the A3.

Section		Track change/comment
RP7		As stated, the site is next to a proposed Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2, although the site has not been safeguarded. Rather than stating that this may cause delay to delivery of the whole site, and taking account of the Crossrail 2 project update, we would prefer that there was a requirement for consultation and cooperation with the Crossrail 2 safeguarding team if plans for the site are brought forward.
RP8		As stated, the site is next to a proposed Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2 although the site has not been safeguarded. Rather than stating that this may cause delay to delivery of the whole site, and taking account of the Crossrail 2 project update, we would prefer that there was a requirement for consultation and cooperation with the Crossrail 2 safeguarding team if plans for the site are brought forward.
Wimbledon		
N3.6j		We welcome the intention to secure investment in Wimbledon station. This site is important for TfL operations including the District line and Tram as well as Crossrail 2 and so there will need to be extensive consultation with a number of different teams within TfL.
3.6.12/13		TfL welcomes the reference to Crossrail 2 and the commitment to collaborative working. Please note the Crossrail 2 project update set out above.
Wi5		The site is adjacent to the bus interchange. It is essential that any redevelopment of this site does not prejudice access to or the operational efficiency of the interchange.
Wi7		The site is adjacent to rail tracks used by the District line. London Underground Infrastructure Protection and Network Rail should be fully consulted regarding any works or development proposals that may impact on rail infrastructure. As noted, the site falls within Crossrail safeguarding limits. Please note the Crossrail 2 project update set out above.

Section		Track change/comment
W116		The site is adjacent to rail tracks which are used by national rail and District line services and will also form part of Crossrail 2. There will need to be wide consultation with Network Rail, TfL and Crossrail 2 to ensure that emerging development proposals protect transport infrastructure, are consistent with safeguarding and maximise the opportunities of this site.
Places and Spaces		
D5.2	Urban Design and the Public Realm	We welcome the emphasis on facilitating walking, cycling and use of public transport. However, this policy should also include reference to the application of the Healthy Streets Approach, the need to improve connectivity and to design and manage car parking so that it does not dominate the street or provide a barrier to safe and convenient movement on foot or by cycle.
Climate Change		
1.1.7		To achieve targets relating to climate change, the potential contribution of car free development to limiting transport emissions should be referred to in this paragraph.
Economy and Town Centres		
7.3 9e		The wording of criterion e should be modified to better reflect London Plan and Local Plan transport policies that require or encourage car free development. In this context, it is not appropriate to refer to the provision of 'adequate' car parking facilities. We suggest rewording as follows: 'Allow adequate safe vehicle access to and from the highway, provide high quality cycle parking in line with policy T6.6, minimise car parking in line with policy T6.8 adequate car parking facilities (both cycling and car parking) and prioritise access by active travel and public transport there should be links to modes of transport other than private vehicle'.
Blue and Green		

Section		Track change/comment
I.1.203		We support the requirement for Construction Logistics Plans, but they should address strategic as well as local traffic impacts.
Health and Wellbeing		
HW2.1i	Health and Wellbeing	TfL welcomes the intention to apply the Healthy Streets Approach.
Transport and Urban Mobility		
All references		<p>Please amend the following to ensure consistency with the wording used in the London Plan.</p> <ul style="list-style-type: none"> • Construction and Logistics Plans • Delivery and Service Servicing Plans • Replace vision zero with The Mayor’s Vision Zero target for road safety • Replace healthy streets assessment with Healthy Streets Assessment • Replace healthy streets approach with Healthy Streets Approach • Replace Parking Management and Servicing Plan with Parking Design and Management Plan • Replace references to Cycle Superhighway and Quietway with Cycleway • Replace references to Tramlink with London Trams
Map	Proposed Cycling Measures/Existing Cycling Facilities/ Route Maps	It would be helpful to have a single map (or area maps) that indicated existing and proposed cycling facilities as well as information shown on the walking and cycling route maps. The proposed cycling measures and routes should be references in transport chapter policies and form the basis for seeking development contributions.

Section		Track change/comment
Map	Public Transport	The area maps appear to be overlapping. Either discrete area maps (linked to the neighbourhood chapters) or a single boroughwide map would be preferable. Routes for Tramlink should instead read 'London Trams'.
Map	Crossrail 2 safeguarding	It is not clear what is being shown by the thick black line as it does not appear to follow either the safeguarding or the rail lines in the background and therefore could be confusing. A map showing statutory safeguarding should be separate from an indicative route map which could be included on the public transport maps.
T6.4	Improving Travel Choices	<p>Although TfL welcomes the requirement for major sites to demonstrate how they contribute to Vision Zero, there is no explanation in either the policy itself or the justification that Vision Zero relates to the Mayor's 2041 target for road casualties. The wording appears immediately after a reference to the Council's carbon reduction objective of becoming net-zero carbon by 2050 which could lead to some confusion.</p> <p>We welcome the adoption of the Healthy Streets Approach and the requirement for developers to apply the Healthy Streets Approach using the TfL toolkit.</p> <p>It would be helpful if the policy also stated an aim of achieving the 2041 target of 73% of all trips on foot, by cycle or on public transport which is set out in the approved Merton Local Implementation Plan</p>
T6.5	Prioritising Walking	To better reflect the London Plan, Part b of the policy should be amended as follows: 'Contribute towards the delivery of liveable car free and low car neighbourhoods through better walking connections.' An accompanying map showing priority areas to improve walking connections would be helpful in securing contributions from development.

Section		Track change/comment
T6.6	Prioritising Cycling	<p>TfL broadly welcomes the positive approach of this policy.</p> <p>To better reflect the London Plan, part a of the policy should be amended as follows: ‘Ensure that cycle parking meets or exceeds London Plan (higher level minimum requirements) and London Cycle Design Standards...’.</p> <p>To clarify that part c refers to cycle hire, we suggest that the wording is modified to: ‘Major development should make provision for designated dock-less cycle vehicle-hire parking areas.’</p> <p>To expand on part d, it would be useful to set out the proposed cycle network, location of hubs and parking areas identifying any gaps that should be filled through contributions from development.</p>

Section		Track change/comment
T6.7	Managing Transport Impacts	<p>To ensure consistency with the London Plan and policy T6.8, part b should extend the areas where permit free development is promoted to include areas of PTAL 3-4 with a stronger requirement for permit free development in PTAL 5 – 6 (see comments below).</p> <p>To provide greater flexibility, the wording of part c could be amended to read: ‘Major development should be located around town centres or other areas with good connectivity by public transport or be able to demonstrate that planned and funded infrastructure or service improvements would improve connectivity to provide the necessary public transport access and capacity’ raise the accessibility level.</p> <p>Part g should clarify that Construction Logistics Plans would be required for developments that could impact on the Strategic Road Network.</p> <p>Development funding may be required to support bus services, although a requirement to support demand responsive bus services will only be required in exceptional circumstances. As such, we suggest part i is simplified to read: ‘Make provision and if necessary, provide funding towards for conventional and demand responsive bus services.’</p> <p>An additional requirement should be for the submission of Delivery and Servicing Plans. Again, this is particularly important for sites close to the Strategic Road Network.</p>

Section		Track change/comment
T6.8	Parking, Deliveries and Servicing	<p>To better reflect London Plan policy T6, the wording of part a should be clarified to read: ‘Development should only provide the level of car parking necessary minimise the amount of car parking, taking into consideration the sites accessibility by public transport (PTAL) in accordance with London Plan parking standards. In PTAL (levels 5 & 6) a presumption in favour of permit free development will apply. Elsewhere within a controlled parking zone or where a controlled parking zone can be created in areas of PTAL 3 or 4, the council will promote permit free development’</p> <p>The wording of part b should also be amended to read: ‘That Disabled parking for disabled car users is provided accommodated within the development and is all such parking spaces are accompanied by have an active electric vehicle charge point.’</p> <p>The wording of part e should be expanded to read: ‘Financial contributions will be sought for parking controls, including the introduction of new or extended controlled parking zones, where it is considered necessary to promote road safety and protect existing residential or business amenity.</p> <p>The wording of part k should provide more guidance on where delivery and collection facilities are appropriate because they can be significant generators of vehicle trips. We suggest that the wording is amended to read: ‘The Council will only support local distribution and collection facilities in locations where the traffic impact can be minimised and maximum use is made of alternatives such as cargo bikes, e bikes or low carbon vehicles providing they are appropriately located and support low carbon vehicle fleets.</p> <p>Two new clauses should be added to confirm that, ‘Delivery and Servicing Plans will be required in accordance with TfL guidance’, and that where parking is provided, ‘Parking Design and Management Plans will be required in accordance with forthcoming TfL guidance’, with links provided to the latest guidance. The justification should confirm that residential parking spaces should be leased rather than sold in line with policy T6.1 in the London Plan.</p> <p>It would also be helpful if the policy provided support for moving freight by rail, water and non-motorised transport as well as the use of consolidation facilities, including micro consolidation.</p>

Section		Track change/comment
T6.8	Justification	<p>The justification refers to the potential for car clubs. Car clubs may play a role in reducing car dependency, but only if they are paired with measures to reduce private car ownership, rather than effectively widening access to car use. The London Plan counts car clubs towards the maximum parking standards for this reason. The borough's policy on car clubs should be consistent with London Plan policy T6.</p> <p>As stated, TfL supports the intention to promote permit free development but we recommend changing the wording of the following paragraph: 'Where a residential or commercial development is situated within a controlled parking zone with connectivity by public transport of PTAL 3 or above, the council will promote permit free development secured via a legal obligation or unilateral undertaking. Permit free development will also be considered directly alongside busy public transport corridors, which fall below this PTAL level on a case-by-case basis where funded improvements to active travel or public transport are put in place to improve connectivity. raise the PTAL level.</p> <p>The following paragraph could be deleted as it largely repeats the same message. Outside town centres and along some transport corridors the level of public transport provision can fall away sharply as walk distances increase just beyond the measurement distances used for PTAL calculations. Where public transport services and facilities are increased to raise the PTAL level, permit free development will be considered by the council.</p>

Section		Track change/comment
T6.9	Supporting Transport Infrastructure	<p>To ensure consistency with policy T3 in the London Plan and taking account of TfL’s wide-ranging responsibilities for transport, we request that part a (iii) is redrafted as follows: ‘Strategic transport authorities including TfL and any other relevant transport providers or operators are satisfied that the proposed development and/or alternative facilities will enable existing transport operations to be maintained and expanded if necessary’ This is particularly important in the case of bus garages which may be owned and operated by third parties, although they play an essential role in maintaining the TfL bus network. Reference should be made to policy T3 in the London Plan and Table 10.1 which lists strategic transport projects.</p> <p>In part b it should be noted that statutory safeguarding is in place for Crossrail 2.</p> <p>In part d TfL welcomes the support given to infrastructure to decarbonise bus operations.</p>

Section		Track change/comment
T6.9	Crossrail 2	<p>The latest project update is available on the Crossrail 2 website and states that:</p> <p>‘The funding agreement with the Government of 31 October 2020 includes a commitment by TfL in relation to Crossrail 2 that TfL “prioritises safeguarding activity and brings an orderly end to consultancy work as soon as possible. DfT will support such safeguarding activity for this project as required.” We will work to help the Secretary of State refresh the safeguarding directions in order to safeguard the scheme’s latest proposed route from future developments. We are in discussion with DfT on the likely timetable for this work. We will also continue to work with stakeholders whose developments are affected by the safeguarding so that we can continue to protect the route until such time as the railway can be progressed. Given TfL’s current finances and the lack of a viable funding package for the scheme at the moment, we are not in a position to confirm when our work on seeking consent can restart. Crossrail 2 will still be needed in future to support London’s growth and we have clearly demonstrated the case for the scheme. The project has been put in good order, ready to be restarted when the time is right.’</p> <p>Land within the borough has been identified and safeguarded in the Crossrail 2 Safeguarding Directions confirmed by the Secretary of State in March 2015. We are awaiting further updates to these Safeguarding Directions. Within Raynes Park, some of the site allocations potentially conflict with the sites needed to deliver Crossrail 2; however, none of the sites south of Wimbledon Town Centre or the onward connection onto the South West Main Line is formally safeguarded. Proposals for Crossrail 2 envisage an onward connection south of Wimbledon onto the South West Main Line corridor. This will require some additional new track between Wimbledon and New Malden. Both Raynes Park and New Malden stations would also require work to accommodate both the new infrastructure and to help speed up interchanges between services. This is likely to involve the lengthening of platforms to accommodate longer Crossrail 2 trains.</p>

Section		Track change/comment
T6.9	Sutton Link	<p>The preferred route to Colliers Wood is correctly identified.</p> <p>A potential tram extension South Wimbledon to Sutton is also mentioned but the wording is unclear; the policy ‘requires that proposals to demonstrate could be accommodated’. We assume this should state that it requires that proposals to demonstrate that the tram extension to South Wimbledon could be accommodated. It would be better to refer to a branch of the tram network to serve South Wimbledon rather than referring to South Wimbledon to Sutton. This is because should the tram go to Sutton, the preferred route would be to Colliers Wood, not South Wimbledon.</p> <p>On a minor point, the document should refer to Phipps Bridge, not Phillips Bridge tram stop.</p>
Policies Map		
	General	<p>The status of the individual maps is unclear. It is assumed that some of the elements will be included in a definitive policies map and that others will be used to support policies in the topic and area-based chapters. The text should therefore refer directly to the relevant maps and explain the notation and status of the information presented within them.</p>
Appendices		
TN10		TfL welcomes the reference to Sutton Link.
TN12		Existing Wimbledon to Croydon corridor—this should refer to tram stop enhancements rather than station enhancements and, as above, Phipps Bridge rather than Phillips Bridge.
TN13		Morden Road tram spur to South Wimbledon—TfL supports the inclusion of this, which is described accurately.