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6 September 2021

Dear Sir/Madam,

**Re: Merton Draft Local Plan – stage 3 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 3 consultation on Merton's Draft Local Plan.

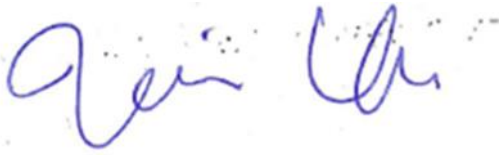
We previously commented on the stage 2a consultation. The London Plan 2021 has now been published and forms part of Merton's Development Plan, containing the most up-to-date policies.

We welcome changes to a number of policies and site allocations which have been made in response to previous representations. In particular we welcome changes to policies on car and cycle parking which better reflect the approach of the New London Plan. We would still like to see some changes to the wording in a few areas to ensure consistency of approach. We have set out a number of detailed 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**

**London Plan and Planning Obligations team | City Planning**

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Appendix A: Specific suggested edits and comments from TfL on the Draft Merton Local Plan stage 3

Section		Track change/comment
<b>Climate Change</b>		
2.1.7		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.
<b>Colliers Wood</b>		
CW1		We welcome inclusion of advice from TfL on access and servicing. The potential use of the site as a cycle hub would need further investigation. More clarity is needed on whether this is intended as part of a wider network of cycle/scooter hire docking stations across the borough, whether it should provide secure cycle parking or provide a hub for a dockless cycle hire or cycle share service. Each of these options may have different spatial requirements. TfL CD as owners of the site will respond more fully on this issue.
CW2		We welcome inclusion of advice from TfL on access and servicing and protection of London Underground infrastructure. The potential use of the site as a cycle hub would need further investigation. More clarity is needed on whether this is intended as part of a wider network of cycle/scooter hire docking stations across the borough, whether it should provide secure cycle parking or provide a hub for a dockless cycle hire or cycle share service. Each of these options may have different spatial requirements.
CW3		We welcome inclusion of advice from TfL on access and servicing and protection of London Underground

Section		Track change/comment
CW4		We welcome inclusion of advice from TfL on access and servicing. The potential use of the site as a cycle hub would need further investigation. More clarity is needed on whether this is intended as part of a wider network of cycle/scooter hire docking stations across the borough, whether it should provide secure cycle parking or provide a hub for a dockless cycle hire or cycle share service. Each of these options may have different spatial requirements. TfL CD as owners of the site will respond more fully on this issue.
CW5		We welcome inclusion of advice from TfL on access and servicing.
<b>Mitcham</b>		
M11		We welcome the commitment by Merton Council to consult with and seek advice from London Trams as well as the requirement for consultation by developers
M17		We welcome the requirement to protect the bus stop or to agree an appropriate relocation with TfL
M18		We welcome the requirement that any negative impacts on bus operations, including during construction, should be minimised and mitigation provided.
M112		We welcome confirmation that bus drivers' facilities must be retained and ideally enhanced as part of any redevelopment of the site and the recommendation that early discussions should take place with TfL London Buses
<b>Morden</b>		
5.1.25		We welcome updates to this paragraph which reflect the current status of the Sutton Link project and provide a more accurate description of the route

Section		Track change/comment
Mo4		We welcome the requirement to engage with TfL to secure suitable alternative bus stand and bus stop facilities. Replacement facilities should be designed and located to ensure there is no loss of capacity or operational efficiency. We also welcome the requirement for engagement with London Underground to ensure that operational assets are safeguarded and the inclusion of advice from TfL on access and servicing
Mo5		We welcome the inclusion of advice from TfL on access and servicing
Mo6		TfL welcomes application of the 'Agent of Change' principle to take account of the adjacent London Underground depot.
<b>Raynes Park</b>		
N6.1 6.1.14/6.1.15		We welcome the references to Crossrail 2, a commitment to collaborative working and the inclusion of advice on project status and safeguarding
RP3		We welcome the inclusion of advice from TfL on access and servicing (included twice in error)
RP4		We welcome the inclusion of advice from TfL on access and servicing (included twice in error)
RP7		As stated, the site is next to a proposed Crossrail 2 station and rail tracks proposed for upgrade by Crossrail 2. We welcome the requirement for engagement 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. We welcome the requirement for consultation and cooperation with the Crossrail 2 safeguarding team if plans for the site are brought forward.
<b>Wimbledon</b>		

Section		Track change/comment
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		We welcome the reference to Crossrail 2 and the commitment to collaborative working
Wi2		We support the requirement to protect and enhance publicly available cycle parking provision
Wi3		We welcome reference to TfL's involvement in master planning work and potential infrastructure requirements relating to the amended use of the golf course site as well as the requirement for a comprehensive travel plan covering all landholdings and the Wimbledon Championships
Wi5		We welcome the requirement for engagement with TfL London Buses to ensure that any redevelopment does not prejudice access to or the operational efficiency of the adjacent bus interchange.
Wi7		We welcome the requirement for engagement with London Underground Infrastructure Protection and Network Rail regarding any works or development proposals that may impact on rail infrastructure. As noted, the site falls within Crossrail 2 safeguarding limits.
Wi16		We welcome the requirement for 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.
<b>Health and Wellbeing</b>		
HW10.1h 10.1.19 HW10.2aii	Health and Wellbeing	TfL welcomes the intention to improve the public realm in accordance with the Healthy Streets Approach and to apply the Healthy Streets Approach as part of development proposals

Section		Track change/comment
<b>Places and Spaces</b>		
D12.2b, v and q	Urban Design	We welcome the emphasis on facilitating walking, cycling and use of public transport, the application of the Healthy Streets Approach as well as 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.
D12.3s	Ensuring high quality design for all developments	We support the requirement for well-designed cycle parking in accordance with London Plan minimum standards and TfL's London Cycle Design Standards
<b>Economy and Town Centres</b>		
13.3 9e		We welcome the modified wording of criterion e to better reflect London Plan and Local Plan transport policies by prioritising access by active travel and public transport, providing adequate high quality cycle parking and minimising car parking in accordance with London Plan standards
<b>Green and Blue Infrastructure</b>		
15.10.39		We support the requirement for Construction Logistics Plans, but they should address strategic as well as local traffic impacts.
<b>Transport and Urban Mobility</b>		

Section		Track change/comment
T16.1 16.1.2	Sustainable Travel	<p>We support the emphasis on active travel and public transport and welcome clarification that Vision Zero refers to the Mayor’s target for road safety</p> <p>We welcome the added reference in section 16.1.2 to the 2041 target of 73% of all trips being undertaken on foot, by cycle or on public transport</p>
T16.2	Prioritising Active Travel Choices	<p>TfL broadly welcomes the positive approach of this policy.</p> <p>We support the application of the Healthy Streets Approach to development proposals (part a)</p> <p>To expand on part c, 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> <p>We welcome the reference to higher level minimum requirements for cycle parking. However, to better reflect the London Plan, part d of the policy should be amended as follows: ‘Ensure that cycle parking meets <b>or exceeds</b> London Plan (higher level minimum requirements) and London Cycle Design Standards...’.</p>
17.2.6		<p>Please also refer to guidance in TfL’s Streets Toolkit which includes Streetscape Guidance and London Cycling Design Standards (which includes guidance on all aspects of cycle infrastructure)</p>
T16.3 17.3.6–17.3.10	Managing the transport impacts of development	<p>We welcome clarification of the role of Construction Logistics Plans in part e and the additional requirement for Delivery and Servicing Plans in part g. However, it would be useful to provide encouragement for greater use of rail or water freight where appropriate.</p>



Section		Track change/comment
T16.4	Parking and Low Emissions Vehicles	<p>We welcome amended wording which better reflects London Plan policy T6. In particular we support the requirement to only provide the minimum level of car parking taking into account PTAL and London Plan parking standards and the much stronger support for car free development (part a). We also support a clearer policy on permit free development in CPZs (part b) and enhanced parking controls where necessary (part c). We also welcome the revised approach to car clubs (part e) and reference to TfL's forthcoming Parking Design and Management Plan guidance in part g.</p> <p>Although there have been some minor changes to ensure consistency with policy T6 of the London Plan, the wording of part d should be further amended to read: 'Disabled <b>persons</b>' parking should be provided in accordance with London Plan standards and should meet design guidelines, be accommodated within the development site <b>where possible</b> and be provided with electric vehicle charge points.' As acknowledged in paragraph 17.4.7 at some constrained sites it may not be possible to provide all of the required level of disabled persons' parking within the site itself. 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>
T16.5 17.5.7	Supporting Transport Infrastructure	<p>We welcome revised wording of this policy including changes to part a to ensure consistency with policy T3 in the London Plan. We also welcome the addition of a reference and link to Crossrail 2 safeguarding in paragraph 17.5.7.</p>