

# Merton Local Plan Examination in Public

## Transport for London (Spatial Planning) –

### Matter 9 Written Statement

**3. Is the overall approach to transport and the related policies in the Plan accepted and supported by Transport for London?**

Yes – TfL has agreed a Statement of Common Ground that confirms we support the overall approach to transport and related policies. The Plan is informed by the Mayor's targets for mode share (73% of residents' daily trips in Merton by sustainable modes by 2041) and supports the Healthy Streets Approach and Vision Zero objective for road safety. Both parties have agreed that Merton's Local Plan is consistent with the approach to transport as set out in the Mayor's Transport Strategy and the London Plan.

#### **Specific Policies:**

**8. Are the Council's proposed modifications to Policy T16.2. necessary to make the plan sound and, if so, would they be effective in doing so?**

London Plan Policy T5 A (2) states that 'Developments should provide cycle parking at least in accordance with the minimum standards.' As such, TfL recommended in its Reg. 19 response that, for clarity, part D of Policy T16.2 should be amended to read: 'Ensure that cycle parking meets or exceeds London Plan (higher level minimum requirements) and London Cycle Design Standards...'. We therefore welcome the reference to meeting or exceeding London Plan minimum standards in MM16.2 because this wording allows for provision higher than the minimum specified where this is appropriate.

However, we do not support the proposed replacement of a specific reference to London Cycle Design Standards (LCDS) with a general requirement for cycle parking to be 'well designed' by MM16.2. This dilutes the requirement to deliver high quality cycle and parking and, as such, suggest that the original reference to LCDS is reinstated. To ensure soundness, the first sentence of part D should read: *'Provide secure, covered and well-designed cycle parking facilities that meet or exceed London Plan standards (higher level minimum requirements) and comply with London Cycle Design Standards.'*

**9. Again, in terms of Policy T16.2, what is the justification for cycle parking facilities that ‘meet or exceed’ London Plan Standards, and is that wording sufficiently clear and unambiguous?**

As stated above in answer to 8, the amended wording of Policy T16.2 (d) proposed by MM16.2 in relation to meeting or exceeding London Plan standards is justified, because this allows for provision higher than the minimum specified standard. The wording further clarifies that ‘meet or exceed’ refers to the higher level minimum requirements for cycle parking and so it is clear and unambiguous and follows a recommendation from TfL. The amended wording should ensure that at all times minimum standards are met although they can be exceeded where appropriate or desired. This avoids a common misconception that minimum standards should be treated as absolute standards which should not be exceeded, even where it is justified by an expectation of higher existing or future demand for cycle parking.

**10. Are the Council’s proposed modifications to Policy T16.3 necessary to make the plan sound and, if so, would it be effective in doing so? Is the threshold for those developments requiring a Travel Plan or a Delivery and Servicing Plan, sufficiently clear and consistent with national policy?**

TfL would prefer the wording of Policy T16.3 to either retain reference to TfL guidance or state ‘in accordance with the London Plan’ when setting out the requirements of, and thresholds for Transport Assessments, Travel Plans, Delivery and Servicing Plans and Construction Logistics Plan. The London Plan has been judged to be consistent with national policy and so this would ensure soundness of the policy requirements.

**13. Are the Council’s proposed modifications to Policy T16.4 necessary to make the plan sound and, if so, would it be effective in doing so? Is it clear what is meant by “good” public transport in terms of the PTALs contemplated?**

TfL supports the proposed modifications to Paragraph 16.4.2 which provide greater clarity and explain what is considered to be ‘good’ public transport in the context of the London Plan approach to car-free development. As stated, in outer London, the London Plan requires car-free residential development in

PTAL 5 – 6 and Major and Metropolitan town centres and encourages car-free development in other well connected locations.

**15. Is it clear what the London Plan standards relating to electric vehicle charging are?**

London Plan minimum standards for electric vehicle charging are set out in Policy T6 (G), and for specific land uses in Policies T6.1 (C), T6.2 (F), T6.3 (F) and T6.4 (C).

**16. Are Policy T16.4 and paragraph 16.4.4 effective and justified insofar as the requirements for ‘permit free’ developments are concerned?**

Yes. To ensure that developments are genuinely car free, and that residents without on-site car parking are unable to park on street (and are made aware of this restriction when purchasing or renting a property in the development), it is necessary for residents to be ineligible for parking permits. The proposed amendment to wording of Policy T16.4 (b) helps to clarify what is meant by development that is permit free.

**17. Should paragraph 16.4.3’s references to financial contributions relating to development in Controlled Parking Zones be included in Policy T16.4 itself (per paragraphs 34 and 58 of the Framework); and is the requirement justified?**

The requirement for financial contributions towards parking surveys and the introduction and/or enhancement of parking controls is justified as a means to ensure that residents of car free development or with restricted car parking are not able to park on street, as these would negate the benefits of car free and car lite development.