

From:
To: [Future Merton](#)
Cc:
Subject: Merton Local Plan Main Modifications - TfL response
Date: 21 March 2024 10:22:27
Attachments: [Merton Local Plan Main Modifications - TfL response FINAL.pdf](#)

Thank you for consulting Transport for London (TfL) on the proposed main modifications. The attached response has been prepared by TfL Spatial Planning and is also included as an appendix to the response sent by GLA.

Best wishes

Principal Planner - Spatial Planning (He/Him/His)
TfL Planning, Transport for London

I work part time and so there may be a short delay in responding to emails

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22 March 2024

Merton Local Plan Proposed Main Modifications

Thank you for consulting Transport for London (TfL). The following response has been prepared by officers in TfL Spatial Planning reflecting TfL's statutory role as the strategic transport authority. It is separate from any response submitted by Places for London in their capacity as a landowner and potential developer.

We welcome a number of the proposed changes which reflect our representations and support sustainable travel within Merton. Having reviewed the schedule of main modifications we have the following comments and observations:

MM74 (5.1.23) / MM87 (Site Allocation M4) – We welcome clarification that where appropriate development proposals may be required to make financial contributions towards the delivery of bus stand and bus stop facilities, in the form of planning obligations.

MM108 / 109 (Wimbledon Policy N9.1) – We support the proposed confirmation that improvements to public transport should be secured and the addition of a new part that reads 'Creating a more pleasant environment for shopping and leisure activities by reducing traffic dominance and managing delivery and servicing needs in a safe, efficient and sustainable way, including through exploring the use of freight consolidation and last mile delivery solutions.' This could be improved further by adding reference to the use of cargo bikes in the last sentence.

MM180 (Below 11.5.6) – We support the inclusion of transport and access criteria when considering the most appropriate sites for student accommodation proposals.

MM222 (12.3.6) – We welcome clarification that ‘TfL’s London Cycle Design Standards provides guidance for the design of dedicated cycle infrastructure.’

MM315 (New paragraph) – We support inclusion of the new paragraph to address Merton’s air quality by encouraging sustainable travel and working with partners including TfL.

MM323 (T16.1 part e) – We note the proposed changes and welcome the added reference to reducing traffic dominance.

MM325 (Policy T16.2 part d) – We note the proposed changes so that it now reads ‘Provide secure, covered cycle parking facilities that meet London Plan minimum standards (higher level requirements) and are designed to a high standard, having regard to the London Cycle Design Standards. Facilities should include provision for charging of electric cycles and a minimum of 5% of cycle spaces should accommodate users of non-standard cycles.’

MM327 (17.2.3) – We support addition of the statement that ‘TfL research indicates that a significant number of existing short car journeys in Merton could potentially be made by walking or cycling.’

MM328 (17.2.4) – We support the additions to this paragraph so that it now reads ‘It is, however, recognised that cycle and pedestrian provision in Merton is not of adequate standard in all areas and that significant barriers still exist to cycle and pedestrian journeys, particularly through the severance created by busy roads. We will work with Transport for London, developers and other partners to make further improvements over the plan period with the aim of providing comprehensive cycling and walking networks that enable active travel choices to be made. In order to contribute to the aim set out in the Government’s decarbonising transport strategy, to deliver a world class cycling and walking network in England by 2040, Merton will produce cycling and walking strategies in 2023 which will set out more detailed proposals for cycle and pedestrian route development over the plan period.’ However the date for production of the cycling and walking strategies will need to be updated.

MM329 (17.2.5) – We support the substantial additions to this paragraph so that it now reads ‘Development proposals must demonstrate through their Transport Assessment or Statement that sites are accessible by walking and cycling in accordance with TfL’s Healthy Streets Approach. An Active Travel Zone (ATZ) assessment should be conducted in accordance with TfL guidance which assesses and identifies opportunities to integrate with and improve cycling and walking networks. ATZ assessments should particularly consider opportunities

to improve cycle routes identified on the indicative cycle network map which shows cycling desire lines and potential routes that could form part of a future comprehensive cycle network to be delivered by the end of the plan period. Some sections of the network already have existing high quality cycle facilities in place and routes on the quieter roads will require minimal intervention. However, some routes will require significant intervention or further improvement to achieve the standard required. Developers should refer to Merton's and TfL's latest cycle route network maps and transport/ cycling strategies for further information on existing and planned routes and seek to consult at an early stage to discuss any requirements in relation to the cycle or pedestrian networks.'

MM330 (17.2.6) – We support the substantial additions to this paragraph so that it now reads 'Developments may be required to make financial contributions to cycling or walking schemes and/ or provide new routes across development sites. Any existing cycle or walking routes on or adjacent to development sites should be fully protected, including during construction phase, and opportunities should be sought to improve and upgrade routes as part of the development proposals. Development layouts must be designed to give priority to pedestrian and cycle movements, facilitate access to public transport networks and be designed in accordance with the Healthy Streets approach. New development should, where appropriate, seek to restrict traffic dominance by adopting the principles of low traffic neighbourhoods and filtered permeability into the site layouts and should integrate with and contribute towards any new or existing low traffic schemes on the surrounding street network. Proposals for gated developments that prevent public access through development sites by cyclists and pedestrians, will not be permitted. New and improved street layouts including pedestrian and cycle infrastructure must be provided to a high standard with regard to the latest best practice design guidance and requirements including DfT Cycle infrastructure design LTN 1/20, Manual for Streets and TfL Streets Toolkit, Streetscape Guidance, London Cycling Design Standards, TfL Healthy Streets Approach and Healthy streets check for designers.'

MM331 (Policy T16.3 part b) – We note the proposed changes to part b so that it now reads 'Demonstrate that any detrimental impact on road safety can be mitigated to an acceptable degree with regard to The Mayor's Vision Zero target for road safety.'

MM332 (Policy T16.3 part c) – We support the addition of the first sentence 'Demonstrate how trips generated by the development will be managed to maximise sustainable travel patterns and reduce reliance on vehicle trips.'

MM333 (Policy T16.3 part e) – We note clarification that 'Developments that will have an impact on the transport network during construction will be required to

develop a Construction Logistics Plan, informed by TfL's latest Construction Logistics Planning guidance.'

MM335 (T16.3 part g) – We note clarification that 'where a significant number of delivery trips are expected to be generated, develop a Delivery and Servicing Plan with regard to TfL's latest guidance.'

MM336 (17.3.5) – We support the additional statement that 'Developers should seek to engage with the Council and TfL at an early stage of the planning process to discuss the specific requirements for a travel plan which will be dependent on the type, scale, location and transport accessibility of the development.'

MM337 (17.3.6) – We support the additional statement that 'Proposals should also demonstrate that the transport impacts of the construction phase have been mitigated to maximise sustainability and reduce local air pollution, including through the use of rail or river (via The Thames) freight for significant developments where feasible.'

MM338 (Policy T16.4 part b) – We welcome clarification that PTAL 5-6 should be explicitly referenced so that it reads 'Development in areas with good public transport accessibility, including town centres and all locations with a PTAL rating of 5 to 6, will be expected to be car free.'

MM339 (Policy T16.4 part b) – We welcome clarification that future occupants of developments in controlled parking zones will be ineligible for on-street parking permits.

MM342 (Policy T16.4 part f) – We welcome clarification that car club spaces should be provided with electric vehicle charging infrastructure and should be included within the London Plan maximum parking standards.

MM343 (Policy T16.4 part g) – We welcome clarification regarding the requirement for Parking Design and Management Plans.

MM348 (new paragraph below 17.4.15) – We welcome confirmation that 'Parking spaces with provision for electric or other Ultra-Low Emission vehicles should be included within the maximum parking provision as set out in the London Plan and not in addition to it.'

We hope that these comments are helpful in finalising Merton Local Plan.

Yours faithfully

London Plan and Planning Obligations Manager