
Thank you for consulting Transport for London (TfL). We have the following comments to make on the draft Character Study and Small Sites Toolkit

Small Sites Toolkit

7.1.2 – In considering noise and vibration effects from transport, reference should be made to the application of the ‘Agent of Change’ principle which places a duty on the developer to ensure that adequate protection is provided from noise, vibration and pollution as a result of neighbouring transport infrastructure or services

7.1.3 – We welcome reference to the Healthy Streets for London guide although this should be titled ‘Healthy Streets toolkit’. As well as the TfL Walking Action Plan, reference should also be made to the TfL Cycling Action Plan

5.1.28/5.1.32 – TfL welcomes the reference to London Plan minimum cycle parking requirements and London Cycling Design Standards. However it would be helpful to clearly separate advice on bicycle parking and bicycle storage in these two paragraphs from the guidance on bin stores and refuse collection. Although there is an illustration of an integrated bike and bin store this may not always be appropriate, particularly in larger developments and it is important that the issues of cycle parking location and access are considered separately.

5.1.34 – 5.1.39 – We would like a much stronger emphasis to be placed on encouraging car free development on small sites which often have good access to shops and services as well as public transport. This could be achieved by placing paragraph 5.1.39 at the start of this section. In paragraph 5.1.38 PTALs refer to Public Transport Access Levels and should be used to determine whether car parking is provided at all because in PTALs 5 – 6 and town centres, sites should be car free. TfL will be producing Parking Design and Management Guidance to support London Plan policies on parking.

Character Study

There are a number of references to on street car parking in parades and corridors being important to retail trade. However, evidence shows that people who arrive on foot, cycle or public transport are much more important in terms of retail spend, frequency and duration of visit than car drivers and contribute more to the local economy. Encouragement could be given to alternative use of on street car parking spaces to create more cycle parking, widened pavements, parklets, space for outdoor dining or public realm improvements. This is likely to be more successful in encouraging more footfall and greater retail spend than retaining car parking, particularly where parking activity obstructs easy movement, exacerbates congestion or degrades the environment. We would also urge the study to encourage the conversion of surplus off street parking spaces to more productive uses including residential or mixed use development as well as enhancements to the public realm and the creation of more amenity space.

We hope that these comments are helpful in finalising the documents

Best wishes
