



Our ref: MERT/19/277  
Your ref: 19/P2387

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27<sup>th</sup> January 2020

Dear Tim

## **19/P2387; 265 Burlington Road, LB Merton – TfL’s updated comments**

This letter updates TfL’s position on the redevelopment of 265 Burlington Road, within the London Borough of Merton (LBM).

TfL set out its initial position within the Mayor’s Stage 1 report dated 9th September 2019 and a letter to the borough dated 10<sup>th</sup> September 2019. These highlighted that the application site has been identified as a proposed worksite for the future delivery of the Crossrail 2 scheme and required for the works associated with the West Barns Lane level crossing. The design proposals for the application site will need to accommodate this future bridge requirement. Further work required to demonstrate how the development contributes towards Healthy Streets and the Vision Zero approach. A financial contribution to improve pedestrian and cycle infrastructure should be secured. The impact on the highway network is still to be determined. The impact on the bus network is still to be determined. A contribution required to upgrade bus stops. Disabled persons parking, EVCP and cycle parking to be provided in accordance with draft London plan standards.

Since the Stage1 report and the initial comments to the borough, the applicant has provided additional information in an email dated 30<sup>th</sup> September 2019.

### *Crossrail 2*

It is disappointing that the response from the applicant fails to mention the Crossrail 2 requirement for the site. It is also disappointing that in a meeting between the GLA and applicant; the applicant has claimed that the Crossrail 2 requirements weren’t raised at the pre-application stage. Meetings were nevertheless held between the Crossrail 2 team and the applicant and London Borough of Merton where Crossrail 2’s requirements for this site were detailed but ultimately not resolved; the last being on 4th September 2019. It is therefore

reiterated that Crossrail 2 are of the view that the proposed redevelopment of this site and the creation of new residential and commercial floorspace would, in the event that powers to deliver Crossrail 2 are approved, be prejudicial to the future delivery of the railway.

### *Healthy Streets*

As the planning application was submitted after TfL formally launched their new guidance this should always have been a consideration, regardless of when the pre-application meeting was held. TfL are not debating that a detailed Walking and Cycling Environmental Review has been undertaken or that Healthy Streets was considered in this audit. The concern was that whilst the Street Improvement Strategy identified future improvements for street and public realm adjacent to the site, only minimal improvements were proposed to be implemented by the applicant. The report quite clearly states 'the proposals outside of the planning application boundary are indicative only and shall be delivered by others'. It was not made clear in the TA that the applicant was proposing to provide a substantial contribution to Merton to deliver all of the improvements identified. Which is why TfL recommended that the borough secures a financial contribution to improve pedestrian and cycle infrastructure in the surrounding area. TfL have now been advised that £150,000 has been secured towards this.

### *Vision Zero*

Given that the redevelopment of the site will result in an overall uplift in person trips within the vicinity of the site, including vehicle, pedestrian and cycle trips, it is disappointing that the applicant is unable to identify any measures which could be used to eliminate any of the identified accidents occurring in the future and contributing towards the Vision Zero approach.

### *Car Parking*

The applicant has now confirmed that disabled person parking and EVCP will be provided in accordance with draft London Plan standards and the draft Car Parking Management Plan (CPMP) should be updated to reflect this. It would be useful if these could be quantified and should be secured by condition. The applicant has also agreed to provide free car club membership for all new residents and this should be secured for three years.

### *Cycle Parking*

The applicant has now provided clarification that all of the 1 bedroom units are 2 person units. Therefore the draft London Plan cycle parking requirement is 1.5 spaces per 2 person 1 bedroom unit not 1 space per unit, which equates to 171 spaces not 114 spaces. In order to accord with the draft London Plan the total cycle parking requirement on site for both the residential and non-residential uses would be 871. Therefore the 830 spaces proposed would fall well short of these standards. The 'Intend to Publish' new draft London Plan has been submitted to Government and its worth noting that there are no

changes to the residential cycle parking standards; giving further weight to the requirement to provide cycle parking in line with draft London Plan standards.

Further information has now been provided on the access routes to the cycle parking stores, and as previously highlighted the ground floor Block F cycle parking and all of the cycle parking located on the first floor is only accessible via multiple doors, which is not convenient and would not meet the good design principles detailed in Chapter 8 of the London Cycling Design Standards (LCDS) Section 8.5.3 Residential Cycle Parking. TfL would recommend that the cycle store for Block F is accessed directly from outside, to resolve this problem. A proportion of short-stay visitor cycle parking is still shown in the long-stay cycle stores. As highlighted previously, this raises issues of security and would not be convenient for users. Short stay cycle parking should be located within 15 metres of the entrance to the destination. Further consideration is required concerning the layout of cycle parking.

#### *Bus Capacity*

As per TfL's recommendation, the applicant has uplifted their predicted bus trip trips to take account of rail passengers using the bus to access the rail stations. The development is now expected to generate 86 trips in the AM peak hour and a further 71 trips in the PM peak hour. Bus route 131 is already near capacity in the vicinity of the site. Therefore, based on the predicted uplift in bus trips and current bus capacity, TfL are seeking a bus contribution of £450,000 (£90,000 per annum for 5 years). The £90,000 p.a. would cover the cost of an extra journey in each peak period.

#### *Bus Infrastructure*

The bus stop accessibility audit identified 4 stops requiring an upgrade to be fully compliant as an accessible bus stop. TfL have looked at these stops in further detail and have identified that only 3 stops require improvements. The following identifies these stops and what improvements are required:

Stop B (9154) – Stop Name – Cavendish Road - This bus stop does not meet TfL required standards for accessibility and would require the bus cage road markings to be extended on the approach by 12m to protect buses pulling into the stop from potential parking obstructions. Bus shelter relocation & upgrade to improve passenger waiting environment and to allow for bus stop to be repositioned correctly on the Kassel Kerb Line to meet TfL standards for accessibility.

Stop C (9155) – Stop Name – Burlington Road / Shannon - This bus stop does not fully meet TfL standards for accessibility and would require the bus cage road markings to be extended on the approach by 4m to protect buses pulling into the stop from potential parking obstructions. Bus shelter would also benefit from being upgraded to improve passenger waiting environment.

Bus Stop E (27392) – Stop Name – West Barnes Level - This bus stop does not fully meet TfL standards for accessibility and would require the council lamp column with (VAS) sign to be relocated slightly by approximately 2-3m and the bus stop to be repositioned correctly on the Kassel kerb line to meet TfL standards for accessibility.

It is recommended that these improvements form part of the applicants s278 works with Merton.

#### *Highway Models*

TfL are currently reviewing the highway models and will provide a more detailed response concerning modelling once this is complete.

#### *Summary*

I trust this provides you with an understanding of TfL's current position on this application and we would welcome acknowledgement from you that these comments have been received and are being considered. Please do not hesitate to contact me if you have any queries. I look forward to discussing these with you and the applicant.

Yours sincerely,

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