

# Richmond Local Plan Examination in Public Transport for London (Spatial Planning) – Matter 19 Written Statement

## Reducing the need to travel and improving the choices for more sustainable travel (Policies 47 – 48)

Are the reducing the need to travel and improving the choices for more sustainable travel policy requirements justified by appropriate available evidence, having regard to national guidance, and local context, and meeting the requirements of the London Plan?

Do the policies provide clear direction as to how a decision maker should react to a development proposal?

TfL is satisfied that subject to the proposed modifications that have been agreed with TfL, policies 47 and 48 are consistent with London Plan transport policies. Further detail is provided in the TfL Statement of Common Ground.

Is it clear how the need for any financial contributions would be triggered, calculated and spent? Is this justified by specific local evidence?

TfL is concerned that the wording of Policy 47 part B could unintentionally make it more difficult to secure mitigation for transport impacts in PTAL 4-6 areas. Contributions may be required to provide transport capacity or access improvements (e.g. bus capacity or step free access at stations) even where the development is in a PTAL 4 – 6 location. We therefore recommend that the wording of Policy 47 part B should be clarified as follows: *‘Propose major developments (see Table 23.1 for a definition) in areas that either already have a Public Transport Accessibility Level of 4-6 or if not mitigate the impact of their development on the existing passenger transport network in accordance with Para. 110d of the National Planning Policy Framework (NPPF).’*

**Policy 47 - Are the Transport Impact Assessment thresholds contained in Table 23.1 justified by local evidence?**

TfL guidance states that Transport Assessments should be prepared for all developments of strategic importance legally referable to the Mayor. Transport Assessments can also be required for non-referable applications in London. National guidance from 2007 is still used by TfL to decide when Transport Assessments and Transport Statements are needed for different types and sizes of development. Allowing for recent changes in use classes the thresholds in table 23.1 are broadly consistent with the national guidance.

<https://content.tfl.gov.uk/thresholds-for-transport-assessments.pdf>

**Policy 48 (I and J) Are requirements for car club spaces or financial contributions in lieu fully justified by local evidence? Are the proposals informed by effective engagement with car club providers?**

The London Plan provides in principle support for car clubs where they provide an alternative to car ownership and states that ‘...to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking.’ It further notes that ‘Car clubs count towards the maximum parking permitted because they share many of the negative impacts of privately-owned cars. However, in some areas, car club spaces can help support lower parking provision and car-lite lifestyles by enabling multiple households to make infrequent trips by car.’ TfL has made representations on this point which are set out in the Statement of Common Ground.

**Policy 48 (K and L) Is there clarity regarding the movement of passengers and freight via the river?**

N/A