



Statement of Common Ground Between

**London Borough of Richmond upon Thames and
Transport for London (TfL)**

Planning

28 February 2024

Contents

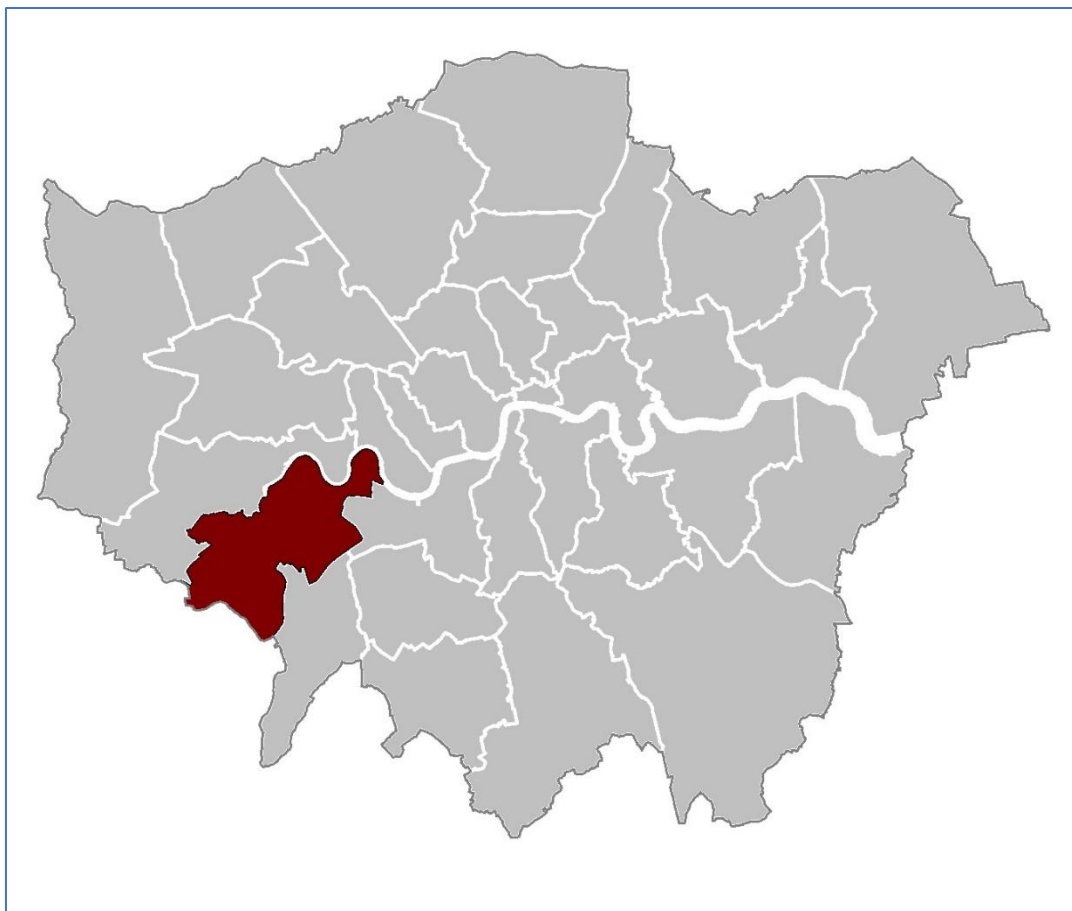
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1. Introduction

- 1.1 Transport for London (TfL), in their representation dated 22 July to the Publication Local Plan consultation, made a number of comments. This Statement of Common Ground (SoCG) sets out the areas of agreement between the London Borough of Richmond upon Thames and Transport for London and the areas where agreement has not been reached on key strategic matters. Where appropriate it proposes resulting modifications to the Publication Local Plan as submitted for independent examination in public, put forward for consideration during the Examination. These modifications are acceptable to and have been agreed by both parties where indicated, and updates to this document will be agreed as matters progress and agreement is reached on any outstanding issues.

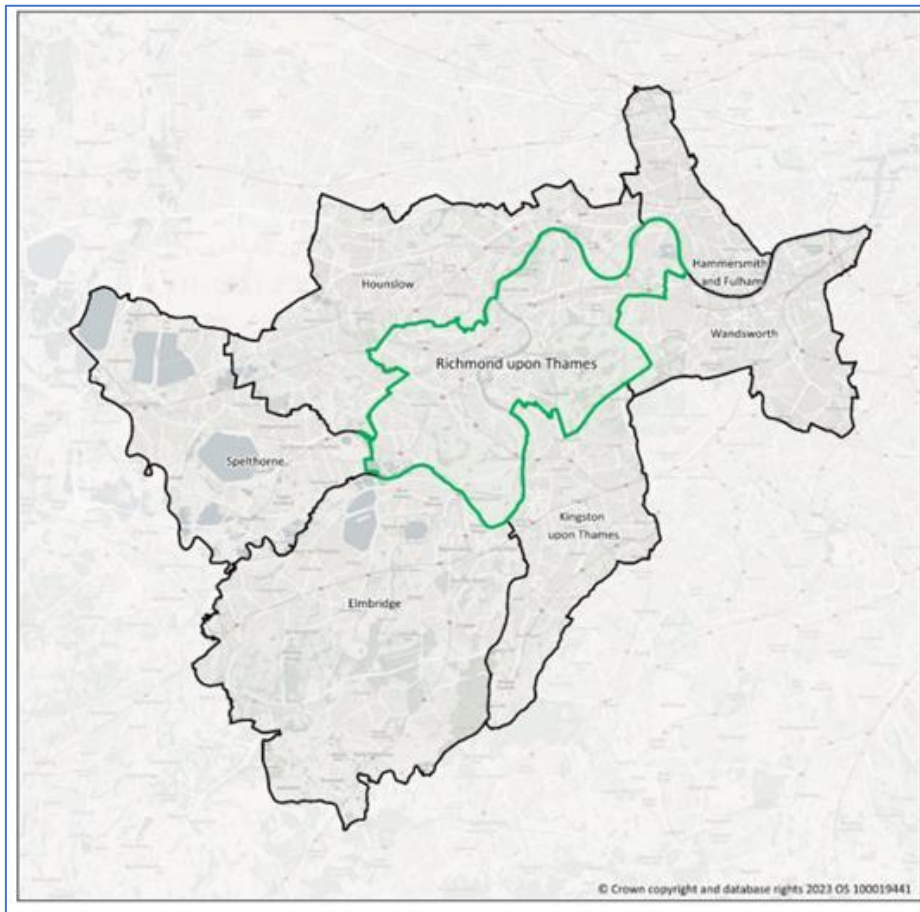
2. Strategic Context

- 2.1 Statements of Common Ground should be read in conjunction with the [Duty to Cooperate Statement \(January 2024\)](#) for the Richmond Local Plan which includes information on strategic matters and context, plan preparation to date and how the Council has cooperated with neighbouring boroughs and other bodies during the preparation of the Local Plan through engagement activities.
- 2.2 In terms of geographical context, Richmond upon Thames is an outer London borough sitting to the southwest of Greater London, one of 32 boroughs plus the Corporation of London (City).



- 2.3 Richmond upon Thames is the only London borough on both sides of the River Thames and is bordered by the **London Boroughs of Hounslow, Wandsworth, Hammersmith & Fulham** and

the **Royal Borough of Kingston upon Thames**. In addition, Richmond shares its boundaries with **Elmbridge** and **Spelthorne Borough Councils** which are within **Surrey County Council**.



- 2.4 Transport for London (TfL) is a transport operator and highway authority in the borough. TfL is the integrated transport authority responsible for the implementation of the [Mayor's Transport Strategy](#) (2018, revised in 2022); the overarching aim of the Strategy is to reduce Londoners' dependency on cars and to increase the active, efficient and sustainable (walking, cycling and public transport) mode share of trips in London to an ambitious 80% by 2041. There are 393 kilometres of public highway in the borough, including 13 kilometres of the Transport for London Road Network (TLRN). The A316 (Great Chertsey Road) and A205 (South Circular) are the two major trunk roads in the borough and are both part of the TLRN. TfL has responsibility for the day-to-day operation of significant parts of the public transport network (including London Buses, London Underground and Overground, Docklands Light Railway, TfL Rail and London Trams).
- 2.5 The London Plan is the spatial development strategy for London, produced by the GLA on behalf of the Mayor of London. It was formally published on the 2 March 2021, and now forms part of London Borough of Richmond upon Thames' Development Plan and contains the most up-to-date policies, including in relation to active travel and parking. Every London borough local plan must be in **general conformity** with the published London Plan, and the GLA determines whether this has been achieved, or not. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any other development plans and neighbourhood development plans.

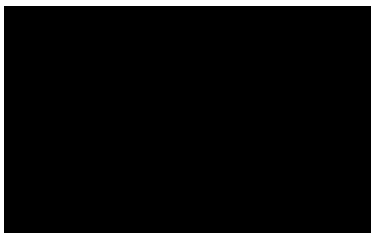
3. Parties Involved

- 3.1 This SoCG has been prepared by the London Borough of Richmond upon Thames in agreement with Transport for London. It addresses strategic spatial policies to be addressed directly by collaboration with Transport for London. The Council is engaged with them on strategic matters on an on-going basis.
- 3.2 Both parties are committed to ongoing liaison to fulfil the duty to cooperate, utilising the appropriate governance arrangements.

4. Signatories

- 4.1 London Borough of Richmond upon Thames agrees to matters referred to in this document which directly impact them.

Signed:



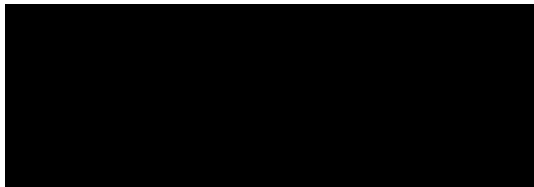
Name: Adam Hutchings

Position: Spatial Planning and Design Team Manager

Date: 28/02/2024

Transport for London agree to matters referred to in this document which directly impact them.

Signed:



Name: Josephine Vos

Position: London Plan and Planning Obligations Manager, TfL Spatial Planning

Date: 28/02/2024

5. Strategic Matters

- 5.1 Duty to Cooperate activities between the London Borough of Richmond upon Thames and TfL are recorded in the Council's Duty to Cooperate Statements – the [Duty to Cooperate Statement \(June 2023\)](#) was produced to accompany the Regulation 19 consultation and an [updated Duty to Cooperate Statement \(January 2024\)](#) records all the activities undertaken as part of the Publication (Regulation 19) stage and prior to submission of the Local Plan.
- 5.2 Matters not specifically addressed within this Statement of Common Ground are discussed within the above documents and both authorities agree that the above documents are an accurate record of their engagement activities and that there are no other unresolved issues.

Key Strategic Matters

- 5.3 Transport infrastructure has previously been identified as a strategic and cross-boundary issue with TfL, the GLA and a number of neighbouring boroughs including Kingston and the Surrey districts, agreeing the need for continued liaison. Overall, the approach set out in the draft Plan is considered in line with the London Plan, with emphasis on Living Locally and walking/cycling for short journeys and the Healthy Streets approach.
- 5.4 During discussions, it has been highlighted that modelling/strategic transport assessment would be useful to tie existing work with strategic sites (e.g., Stag Brewery, Kew Retail Park). Although it was noted in discussions with the GLA that this is not related to any conformity issue it was raised by a number of respondents and other Duty to Cooperate bodies. TfL have also raised the need to ensure the Site Allocations in the Plan are consistent with the policies in terms of the approach to parking.
- 5.4 Following on from the Regulation 19 comments raised, including through Duty to Cooperate, there was progress on the Council's preparation of a series of draft background topic papers to draw together information particularly in areas where comments have been raised. The papers were shared with the relevant Duty to Cooperate bodies, to request any feedback particularly if there was missing or insufficient detail. The Council shared a draft of the Transport and Housing Delivery Background Topic Papers with Transport for London on 28 November 2023. The Transport Paper sets out the Council's assessment that, as per previous Local Plans, development will have no strategic impact on transport or highways outside the borough and there is nothing unconventional about the policies and site allocations within the emerging Local Plan. The paper brings together some additional information, drawing on the baseline conditions and broader context, including other measures, and using modelling of trip generation forecasts.
- 5.5 TfL responded on 14 December with suggested amendments on the Transport Background Topic Paper as well as some technical points. The comments received have informed this Statement of Common Ground, and an updated Transport Background Topic Paper was submitted with the Local Plan.
- 5.6 It is expected that some issues raised at the Regulation 19 stage are likely to remain issues for consideration during the Local Plan Examination.

6. Table of representations, Council's response and progress towards addressing strategic cross-boundary issues

Text proposed to be **inserted** shown by underlining in blue highlight. Text proposed to be **removed** highlighted in ~~strikethrough~~.

The following table details the matters raised by Transport for London (TfL) as representations to the Regulation 19 Richmond Local Plan (Publication Plan), and the status of those representations. As documented in the Duty to Cooperate Statement (January 2024) and noted below, the Council has drawn together information in a series of background topic papers. Draft papers on Transport and Housing Delivery were shared with Duty to Cooperate bodies including TfL and the further comments received are detailed below.

The table seeks to provide clarification and clarity to the extent to which matters raised by TfL are resolved or remain unresolved. The table therefore represents the current agreed position in respect of the agreements and differences between the Council and TfL.

Section / Policy	Rep No.	Transport for London Representation	Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
General	11	<p><i>Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Transport Trading Limited Properties (TTLP) – formerly TfL Commercial Development, to reflect TfL's interests as a landowner and potential developer.</i></p> <p>Thank you for giving Transport for London (TfL) the opportunity to comment on Richmond's draft local plan. As you are aware, the London Plan 2021 was published in March 2021 and now forms part of Richmond's development plan.</p> <p>We previously responded to the Regulation 18 consultation and are pleased to note that a number of our points have been addressed and so we set out updated comments to reflect these changes in the appendix below. [See comments in this schedule in relation to place-based strategies, site allocations and policies].</p> <p>As previously stated we strongly welcome your aspirations to implement the 20 minute neighbourhood concept, reduce the need to travel and improve the choices for more sustainable travel. In particular, we welcome the ambitions set out in the draft local plan to: decrease car use and achieve mode split targets and implement the Healthy Streets Approach. We are pleased to see the plan's recognition of the importance of active travel and public transport. However, it would be helpful if reference could also be made to achieving the Mayor's Vision Zero ambition for road safety. We note from the consultation statement that you do not believe this is a planning issue. However, a clear ambition provides a justification for requiring road safety measures as part of development proposals and associated highways improvements.</p> <p>We commend you for adopting London Plan parking standards and the encouragement of car free development. This positive approach was not always reflected in site allocations which referred to car parking requirements or needs in the Regulation 18 draft. We therefore welcome amended wording and additional references to London Plan standards although there are still a few instances where we recommend further amendments to ensure consistency with the London Plan.</p> <p>We welcome your intention to seek contributions towards active travel improvements and enhanced public transport capacity and infrastructure. We also welcome the safeguarding of transport land, and we support the extension of this safeguarding to existing transport infrastructure as well as future schemes.</p> <p>In our Regulation 18 consultation response, we recommended that you consider the potential need for a borough-wide strategic transport assessment which would look at the cumulative impact of major site allocations and the expected background growth in travel. We note from the consultation statement that you do not see a need for a strategic transport assessment but have instead referred to pre application advice and use of TfL and national modelling tools in order to take into account cumulative impacts as part of the transport assessment process. We understand that you intend to draw together information that already exists on the likely transport impact of the Local Plan, into a background paper. We welcome this approach and look forward to reviewing the draft background paper.</p> <p>Our updated responses to specific points in the draft local plan are set out in the attached appendix. [See comments in this schedule in relation to place-based strategies, site allocations and policies].</p> <p>We look forward to continuing to work together in drafting the final document and are committed to continuing to work closely with the GLA to deliver integrated planning and make</p>	<p>Comments noted.</p> <p>Note support for the 20 minute neighbourhood and focus on active travel and public transport.</p> <p>The Council's response to a comment on the Regulation 18 Plan (comment 46) was that measures to achieve Vision Zero, such as lowering traffic speeds and targeting road danger reduction, are largely outside of the remit of the Local Plan and therefore it was not considered necessary to reference. It is noted however there is an overlap with designing safe streets, and an Additional Modification to paragraph 4.8 could be considered to reference the Mayor's Vision Zero Strategy.</p> <p>Suggested modification:</p> <p>To add reference to the Mayor's Vision Zero Strategy for road safety, as measures may form part of development proposals and associated highways improvements, and clarify the London Plan reference:</p> <p>4.8 The 'living locally' concept relies on inclusive and attractive high streets and public spaces, promoting and encouraging walking, cycling and accessibility for all; this complements the Mayor's Healthy Streets approach as set out in <u>TP2 Policy T2</u> of the London Plan. <u>It should also reflect the Mayor's Vision Zero which seeks to reduce road danger and create a safer transport environment for all.</u></p> <p>A draft of the Transport and Housing Delivery Background Topic Papers were shared with TfL on 28 November 2023.</p>	<p>Strategic traffic/highway impact on other authorities' networks, Table 4 - Estimated impact of development related motor traffic on neighbouring authority highway networks</p>	<p>Agreed in relation to proposed modification to add reference to Vision Zero Strategy.</p> <p>TfL responded with suggested amendments and technical points on the Transport Background Topic Paper on 14 December 2023.</p> <p>In summary these cover:</p> <ul style="list-style-type: none"> • Support use of the Motion dashboard. Recommend use of the Planning Forecasts as the default demand scenario. • Seek confirmation of a number of data sources and outputs. • It would be useful to see local future flows on the highways and public transport network to pick up through trips and hotspots/congestion. • Acknowledge there may be localised impacts on public transport or the highway network for which the Council and TfL will seek appropriate site-specific mitigation. • Reduction in car ownership levels is reliant upon restrictions on car parking with development in line with London Plan/Local Plan parking standards and this should be made clear. • The impact of other transport interventions such as ULEZ or parking management is not evidenced and should not be referenced. • Substantial additional resources would be required to reinstate public transport services, and new development would need to contribute to costs. • Localised increases in walking and cycling generated by development may need consideration, such as capacity at signal crossings, addressing safety concerns. • In conclusion feel the impact of non-development related impacts are not evidenced, and should make it clear the cumulative impact of development has been assessed. <p>An updated Transport Background Topic Paper is submitted, informed by these comments and those from other Duty to Cooperate bodies, with the Local Plan. Wording has been amended and additional clarification has been added to the paper, although it is considered reasonable to expect other non-development transport interventions to have a greater impact on traffic volumes.</p> <p>Agreed that the Transport Background Topic Paper provides useful context and at a boroughwide level the cumulative impact of development proposed in the Plan on trip generation is limited.</p> <p>On-going in relation to continued assessment of transport impacts, as it is expected to be a matter discussed at Examination including with other respondents.</p>

Section / Policy	Rep No.	Transport for London Representation			Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?					
		the case for continued investment in transport capacity and connectivity to enable Good Growth in Richmond and across London.										
Places	79	<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>All Site Allocations</td> <td>Not applicable</td> <td>We note that you have added in some useful context on transport/highways for all sites which we welcome. However, we recommend that you state the PTAL as a numeric score and remove any subjective grading such as 'poor, average or good'. The London Plan no longer uses subjective grading. How a PTAL is valued depends on the context – in a suburban area a site with a PTAL of 3 may be regarded differently to the same score for a site in Richmond or Twickenham town centres. It may also depend on the proposed uses.</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	All Site Allocations	Not applicable	We note that you have added in some useful context on transport/highways for all sites which we welcome. However, we recommend that you state the PTAL as a numeric score and remove any subjective grading such as 'poor, average or good'. The London Plan no longer uses subjective grading. How a PTAL is valued depends on the context – in a suburban area a site with a PTAL of 3 may be regarded differently to the same score for a site in Richmond or Twickenham town centres. It may also depend on the proposed uses.		Comments noted. Officers are conscious that not everyone, such as the average lay person, would be familiar with the PTAL grading system, and thus the subjective grading detail within the Site Allocations text remains a helpful detail, noting too that PTAL scoring is still used by the GLA and within the London Plan, which itself is a grading system, i.e. 0 is 'worst' and 6b is 'best'. It would be expected that the particular highways, transport and access circumstances of each site would be considered in more detail at full planning stage, and that the PTAL reference, as currently worded, does not preclude consideration of individual site circumstances in relation to a proposed development.	n/a	<p>On-going in relation to reference to PTAL scoring. TfL preference is to remove subjective wording such as 'poor, average or good' because PTAL scores are widely used in planning decisions without any further wording. If useful an explanatory note or glossary could be used to explain that a score of 0 is lowest and 6b is highest.</p> <p>The Council and TfL consider the glossary could be further expanded: Suggested modification: Public Transport Accessibility Levels (PTAL) – A measure of the relative accessibility of buildings and uses by to the public transport network. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density. This provides an overall access index which can be allocated to nine access levels between 0 and 6b. The higher the PTAL score (between zero to six), the better the accessibility. TfL has made pre-calculated PTALs available on WebCAT, its web-based connectivity assessment toolkit (www.tfl.gov.uk/WebCAT).</p>
Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19										
All Site Allocations	Not applicable	We note that you have added in some useful context on transport/highways for all sites which we welcome. However, we recommend that you state the PTAL as a numeric score and remove any subjective grading such as 'poor, average or good'. The London Plan no longer uses subjective grading. How a PTAL is valued depends on the context – in a suburban area a site with a PTAL of 3 may be regarded differently to the same score for a site in Richmond or Twickenham town centres. It may also depend on the proposed uses.										
Site Allocation 1: Hampton Square, Hampton	120	<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 1: Hampton Square Hampton</td> <td>The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.</td> <td>Although we welcome the reference to car parking provision in line with London Plan standards, the use of the word 'retain' could be misinterpreted as requiring the existing level of provision. London Plan Policy T6 part B states that 'Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').' Part L states that 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.' Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: 'retain-minimise car parking provision in line with current London Plan standards.'</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 1: Hampton Square Hampton	The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.	Although we welcome the reference to car parking provision in line with London Plan standards, the use of the word 'retain' could be misinterpreted as requiring the existing level of provision. London Plan Policy T6 part B states that 'Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').' Part L states that 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.' Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: ' retain -minimise car parking provision in line with current London Plan standards.'		The Council's response to the respondent's comment on the Regulation 18 Plan (comment 288) was that the amendment to include reference to adherence to London Plan parking provision standards was considered sufficient to ensure that developers do not seek to maximise parking beyond this, and that it was not considered reasonable to insist on minimisation of parking provision to below London Plan requirements given the low PTAL and lack of CPZ, and as the Site Allocation also seeks any scheme to encourage active travel.	n/a	<p>On-going in relation to London Plan parking standards in Site Allocation 1. TfL preference is to remove the word 'retain' even if the word 'minimise' is not adopted instead.</p>
Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19										
Site Allocation 1: Hampton Square Hampton	The requirement to retain adequate car parking to meet the needs of the community centre and new uses should be modified by stating that car parking should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards.	Although we welcome the reference to car parking provision in line with London Plan standards, the use of the word 'retain' could be misinterpreted as requiring the existing level of provision. London Plan Policy T6 part B states that 'Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite').' Part L states that 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.' Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: ' retain -minimise car parking provision in line with current London Plan standards.'										
Site Allocation 4: Car Park for Sainsburys, Uxbridge Road, Hampton	128	<table border="1"> <thead> <tr> <th>Section</th> <th>Track change/comment – Reg. 18</th> <th>Updated track/change comment – Reg. 19</th> </tr> </thead> <tbody> <tr> <td>Site Allocation 5 [now Site Allocation 4]: Car park for</td> <td>Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.</td> <td>We welcome the additional requirement that bus stop S should be retained. Although we welcome the reference to London Plan standards to be consistent with London Plan Policy T6</td> </tr> </tbody> </table>	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Site Allocation 5 [now Site Allocation 4]: Car park for	Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.	We welcome the additional requirement that bus stop S should be retained. Although we welcome the reference to London Plan standards to be consistent with London Plan Policy T6		<p>Support noted.</p> <p>An Additional Modification could be considered to ensure consistency with the London Plan.</p> <p>Suggested modification: Amend the reference to parking in the vision to ensure consistency with London Plan Policy T6:</p>	n/a	<p>Agreed in relation to reference to London Plan parking standards in Site Allocation 4.</p>
Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19										
Site Allocation 5 [now Site Allocation 4]: Car park for	Bus services in both directions serve a bus stop on this site that is alongside the existing store. The site allocation should make it clear that the bus stop must be retained in any redevelopment.	We welcome the additional requirement that bus stop S should be retained. Although we welcome the reference to London Plan standards to be consistent with London Plan Policy T6										

Section / Policy	Rep No.	Transport for London Representation			Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
		Sainsbury's, Uxbridge Road, Hampton	The statement that parking is expected to be re-provided for the adjacent food store should be modified by stating that car parking should be minimised as part of any redevelopment consistent with stated objectives to reduce car dominance and should not exceed maximum parking standards. London Plan Policy T6 states that 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London'. We note that the existing petrol filling station is expected to be retained or re-provided. London Plan Policy T6 states that 'New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities'.	we recommend that the wording is amended to read 'Parking provision to London Plan standards is expected to be provided including re-provision for the adjacent supermarket in line with current London Plan standards. ' We welcome the requirement for rapid charging hubs and/or hydrogen fuelling facilities at the retained petrol station.	Parking provision to London Plan standards is expected to be provided including re-provision for the adjacent supermarket in line with London Plan standards.		
Site Allocation 12: The Stoop (Harlequins Rugby Football Club), Twickenham	197	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Comments noted.	n/a	Agreed.
		Site Allocation 12: The Stoop Twickenham	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	We note the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.			
Site Allocation 13: Twickenham Stadium, Twickenham	201	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted. An Additional Modification could be considered, to ensure consistency with the London Plan. Suggested modification: Amend the reference to parking in the vision to ensure consistency with London Plan Policy T6: There is a need to retain Parking provision particularly for coaches, servicing facilities and space for spectators and related services, should be in line with London Plan standards and should include coach parking and servicing facilities.	n/a	Agreed in relation to reference to London Plan parking standards in Site Allocation 13.
		Site Allocation 13: Twickenham Stadium, Twickenham	The allocation states that there is a need to retain sufficient parking, particularly for coaches. This should be rephrased to make it clear that although coach parking should be provided, car parking for employees or spectators should be minimised as part of any redevelopment, consistent with stated objectives to reduce car dominance. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	We welcome amendments to the wording which removes the word 'sufficient' and refers to London Plan parking standards. However, to ensure consistency with London Plan Policy T6 the wording should be amended to read: ' There is a need to retain Parking provision particularly for coaches, servicing facilities and space for spectators and related services, should be in line with London Plan standards and should include coach parking and servicing facilities. ' We welcome the reference to close working with TfL to ensure development does not lead to unacceptable impacts on the local road network.			
Site Allocation 15: Station Yard, Twickenham	206	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.

Section / Policy	Rep No.	Transport for London Representation			Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
		Site Allocation 15: Station Yard, Twickenham	We welcome the reference to bus stands. However, the requirement that bus stands should be retained, redeveloped or re-sited in a suitable location needs to be clarified. If bus stands are redeveloped or re-provided this should only be with the agreement of TfL and standing capacity (as well as drivers' facilities) must be maintained and enhanced.	In relation to the retention of the bus stands we welcome the addition of references to adequate standing capacity and drivers' facilities.			
Site Allocation 17: Twickenham Riverside and Water Lane/King Street	212	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		Site Allocation 18 [now Site Allocation 17]: Twickenham Riverside and Water Lane/ King Street	We welcome the suggestion that <i>'There should be a comprehensive approach to servicing and delivery, along with exploring the opportunity to improve the environment of the Embankment through a reduction in car parking.'</i> This could be more directly worded to state that any redevelopment would be expected to remove car parking on the Embankment.	We welcome the clarification that <i>'Given the high PTAL, a reduction in car parking is sought to improve the environment of the Embankment.'</i>			
Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham	216	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		Site Allocation 19: Fulwell Bus Garage, Wellington Road, Twickenham	N/A	We note the new site allocation for Fulwell Bus Garage and support the requirement to retain the bus garage use on the site.			
Site Allocation 25: Richmond Station, Richmond	248	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		Site Allocation 24 [now Site Allocation 25]: Richmond Station, Richmond	We welcome the stated aim of a comprehensive approach including transport interchange improvements. We would expect to be closely involved in both the development of the SPD and early discussions about potential redevelopment plans. It would be helpful to make this expectation clear in the site allocation.	We welcome the reference to a partnership approach with Network Rail and TfL.			
Site Allocation 29: Homebase, Manor Road, North Sheen	260	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		Site Allocation 28 [now Site Allocation 29]: Homebase, Manor Road, East Sheen	We welcome the requirement for the retention of the existing bus terminus. It would be helpful to clarify that this comprises both bus standing and drivers' facilities, and that they should be retained and enhanced in any redevelopment in consultation with TfL. The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with	In relation to the retention of the bus terminus we welcome the addition of references to adequate standing capacity and drivers' facilities. We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network			

Section / Policy	Rep No.	Transport for London Representation			Council's Response (including any proposed modifications)	Background Paper ref	Common Ground Agreed?
			TfL to assess potential impacts on the TLRN.				
Site Allocation 30: Sainsburys, Lower Richmond Road, Richmond	265	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support for amendments made in response to Regulation 18 comments noted. Comments regarding car parking noted. The Council's response to this issue raised on the Regulation 18 Plan (comment 614) was that while there is an aim to reduce car dependency, car-parking provision would be assessed on a case by case basis and as stated in line with London Plan standards. <i>Note comments on this issue were also raised on behalf of Sainsburys Supermarkets Ltd – who support the requirement to provide adequate car parking in line with London Plan standards, but raise the need to provide adequate servicing areas and operational land as well. The Council considers such matters of servicing would be appropriately dealt with at full planning application stage.</i>	n/a	On-going in relation to reference to parking provision in Site Allocation 30, and this is expected to be discussed with other respondents. TfL preference is to remove the word re-provided in connection with car parking because this is misleading so that it reads '...associated car parking provision is expected to be in line with London Plan standards' This would be consistent with the representation on behalf of Sainsburys
		Site Allocation 29 [now Site Allocation 30]: Sainsbury's, Lower Richmond Road, Richmond	The site is adjacent to the Transport for London Road Network (TLRN). Early engagement should take place with TfL to assess potential impacts on the TLRN.	The first point of the vision now states that 'Any redevelopment proposal will be required to retain and/or re-provide the existing retail floorspace; associated car parking provision is expected to be re-provided in line with London Plan standards.' Although we welcome the reference to London Plan standards, the London Plan requires retail development in PTAL 5 to be car free and so an expectation that associated car parking should be re-provided is inappropriate., particularly in light of London Plan Policy T6 which states that 'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy.' The London Plan standard of car free development should be made clearer in the wording. We welcome the reference to engagement with TfL to ensure development does not lead to unacceptable impacts on the local road network			
Site Allocation 31: Kew Retail Park, Bessant Drive, Kew	276	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	An Additional Modification can be considered to reflect the accurate PTAL rating. Support for amendments made in response to Regulation 18 consultation comment noted. Suggested modification: Add to first bullet point of 'Transport/Highways' box in 'Context' section: PTAL 0-2 'worst to poor'	n/a	Although TfL welcomes the more accurate PTAL score of 0-2 the subjective wording 'worst to poor' should be removed from the modification. On-going in relation to description of PTAL, see also response to comment 79 above.
		Site Allocation 30 [now Site Allocation 31]: Kew Retail Park, Bessant Drive, Kew	The site is adjacent to the Transport for London Road Network (TLRN). We therefore welcome the statement that 'The applicant is strongly advised to seek pre-application transport and highway safety advice from Borough and TfL Officers before writing their transport assessment.'	The PTAL for a large part of the site is 2 including the main access points and frontage, so we would expect this to be used as the baseline rather than the stated PTAL of 0 which is influenced by the lack of access to the rear of the site. We welcome confirmation that 'Car parking provision is expected to be in line with London Plan standards'			
Place-based Strategy for Mortlake & East Sheen	287	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	No comments.	n/a	n/a
		Place Based Strategy for Mortlake and East Sheen Other Initiatives	We note the reference to a potential cycle route between Mortlake and East Sheen in TfL's Cycling Action Plan. This is indicative and more work will be required to determine the actual alignment of any cycle route.				
Site Allocation 35: Stag Brewery, Lower Richmond Road, Mortlake	293	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	The Council's response to TfL's comment on the Regulation 18 Plan (comment 649) set out the link to the SPD on the site although noted the uncertainty around wider bus services in the area since Hammersmith Bridge was closed for repairs and the possible options, suggesting no amendments to the Site Allocation	n/a	On-going in relation to the Avondale Road bus station. TfL maintains its position that the more flexible wording regarding bus standing should be adopted because the Avondale Road bus station is a separate issue.
		Site Allocation 34 [now Site Allocation 35]	We note the statement that 'The Council will expect the developer to work together with relevant partners, including Transport for	We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and			

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		35]: Stag Brewery, Lower Richmond Road, Mortlake	<i>London, to ensure that where necessary improvements to sustainable modes of travel, including public transport facilities, are secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment.</i> Although we support the requirement for bus standing space within the development site, TfL does not support the closure of Avondale Road Bus station. The proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus stops and turning facility at Avondale Road.	independent of, the bus stops and standing facility at Avondale Road. To ensure consistency with London Plan Policy T3 the wording should be amended to remove reference to the Avondale Road bus station by replacing the current wording: 'The opportunity to relocate the bus stopping/turning facility from Avondale Road bus station to this site should be investigated, if appropriate, as part of a comprehensive redevelopment' with 'Additional bus standing space is likely to be required within the development site.'	necessary as there is flexibility for a design-led transport solution informed by liaison with TfL at full planning stage. Since then, planning applications refs. 22/0900/OUT and 22/0902/FUL have received resolution to grant permission from Richmond Planning Committee on 19/07/2023, subject to referral to the GLA and a legal agreement. TfL commented on the applications as a statutory consultee. TfL's revised comments to the application following the provision of further information advised that further detailed design details be agreed via further discussions, to be secured by either condition or S106 agreement, and overall support for the opportunity to deliver a bus driver facility to support the existing bus stands on Mortlake High Street. Applications are due to be reconsidered following amendments to the proposals to address fire safety. It is considered that the matters raised by TfL to the Regulation 19 Local Plan consultation can continue to be addressed at planning application stage, and no wording to the Site Allocation is necessary.		
Policy 15 Infill and Backland Development	381	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		Policy 15. Infill and Backland Development	In A2, we welcome encouraging the redevelopment of car park sites to provide housing, although it should be noted that in policy H1 of the London Plan there is no need to demonstrate that the parking is no longer needed. This is because parking is known to induce car travel so demand for it should not be described as arising from 'need'. As such, reductions in parking can deliver mode shift and reduce the dominance of vehicles in an area. To ensure consistency, this requirement should be deleted.	We welcome removal of the requirement to demonstrate that parking is no longer needed and its replacement with the condition that 'provided any net loss of parking is assessed in accordance with Policy 47 'Sustainable Travel Choices (Strategic Policy)' and Policy 48 'Vehicular Parking Standards, Cycle Parking, Servicing and Construction Logistics Management'			
Policy 47 Sustainable Travel Choices (Strategic Policy)	524	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Part B – wording of the policy does not preclude contributions towards public transport in higher PTAL areas. As set out in the response to the TfL comment on the Regulation 18 Plan (comment 1047), this will be assessed on a case-by-case basis in relation to proposals that come forward. As set out in the response to the TfL comment on the Regulation 18 Plan (comment 1047), on Part C – Active Travel Zone (ATZ) Assessment can be implemented through Healthy Streets.	n/a	On-going in relation to public transport contributions in higher PTAL areas and in relation to Active Travel Zone Assessments. TfL position is that the wording could make it more difficult to secure mitigation for transport capacity impacts in PTAL 4-6 areas even if this is not the intention. Suggest minor rewording 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). The reference to Active Travel Zone Assessments in the accompanying text would provide clarity on what is expected. Noting the Active Travel England and Transport for London Standing Advice Note , published October 2023 and due to be updated February 2024, the Council considers a reference in the supporting text could be considered during the course of the Examination.
		Policy 47. Sustainable Travel Choices	We support the potential requirement in part B to provide financial contributions towards increased capacity or improved infrastructure. However public transport capacity constraints may also apply in higher PTALs and so the wording should make it clearer that there is a potential requirement for contributions to public transport in all areas, regardless of PTAL. The level and type of mitigation will be informed by a multi-modal impact assessment. Part C could refer to implementing measures that are identified through an Active Travel Zone (ATZ) Assessment in line with the Healthy Streets Approach Part	We reiterate our comments on the need for public transport capacity constraints to be mitigated for developments in higher PTALs. A congested station may have a high PTAL but a contribution to increase station capacity would be both justified under NPPF and the London Plan and necessary for the development to go ahead. We also repeat our request for a reference to an Active Travel Zone Assessment either in part C or accompanying text. We welcome amended wording in part H which now requires safeguarding for transport schemes			

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			H should refer to safeguarding existing transport infrastructure in addition to safeguarding transport schemes.	and infrastructure set out in the London Plan or the Council's Local Implementation Plan.			
Paragraph 23.1	533	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		23.1	We strongly welcome the borough's commitment to promoting sustainable travel, decreasing car use, and improving air quality. However, the commitment to decreasing car use could be made more prominent by referring to it in policies. As stated, <i>'Ensuring that walking, cycling and public transport are the natural choice for trips to and from new developments is vital if these goals are to be achieved.'</i> We also welcome confirmation that Local Plan policies should be read alongside those in the London Plan and the Mayor of London's Transport Strategy.	We welcome the inclusion of commitments to promote sustainable travel, decrease car use and improve air quality within Policy 47 itself.			
Paragraph 23.2	534	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		23.2	When referring to the Council's sustainable transport mode split targets, it is helpful to clarify that developments will need to demonstrate how they are contributing to achievement of those targets.	We welcome the addition of the final sentence confirming that 'Planning applicants proposing major developments will need to demonstrate how their proposals help meet these targets.'			
Paragraph 23.10	535	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		23.10	When referring to London Plan minimum standards for cycle parking, it is helpful to add that developments that exceed minimum cycle parking provision will be encouraged.	We welcome amended wording which now clarifies that 'Cycle parking should, at least, be provided in accordance with the minimum standards in the London Plan.'			
Paragraph 23.21	536	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Support noted.	n/a	Agreed.
		23.21	We welcome safeguarding of bus garage facilities, but it should be made clear that in all cases TfL agreement will be needed to confirm that any replacement facilities are fit for purpose and capable of being delivered, or that existing facilities are surplus to requirements. This will take into account the need for additional space to accommodate alternative fuel facilities.	We welcome amended wording which recognises TfL's role and states that 'The loss of existing bus garages will be resisted, to safeguard capacity for efficient and sustainable operation of the network, unless it is demonstrated, and confirmed by Transport for London, that it is operationally no longer needed or enhanced reprovision has been made as part of the redevelopment of the site or elsewhere in a convenient and accessible alternative'			
Policy 48 Vehicular Parking Standards, Cycle Parking,	540	Section	Track change/comment – Reg. 18	Updated track/change comment – Reg. 19	Note TfL guidance on Parking Design and Management Plans is due to be issued, but normally a reference would be added once it is published and the scope and	n/a	Agreed. TfL has made its position clear in its representation but accepts that the Council's view differs on these points. Draft London

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Servicing and Construction Logistics Management		Policy 48. Vehicular Parking standards, Cycle Parking, Servicing and Construction Logistics Management	<p>We strongly support the requirement to provide cycle and vehicle parking in line with London Plan policies and standards, including reference to London Cycling Design Standards. Where parking is provided, a Parking Design and Management Plan should be submitted with the application. In part F we welcome the encouragement of car free developments in PTAL 3 or above. In F5, where CPZs are not already in place it would be appropriate to encourage developments to provide funding towards implementation of a new or extended CPZ (or equivalent parking controls). In F8, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs. In part G, there may be a need to consider on street disabled persons' parking spaces on constrained sites that are otherwise suitable for car free development. We can provide advice on how this works in other boroughs if helpful. In part H, where there is physically no possibility of accommodating short stay cycle parking on site, on street provision may need to be considered as set out in paragraph 23.35. In part I, it may not be appropriate to require car club spaces to be provided in developments in areas of very good connectivity where alternatives to car use can provide for all travel needs. In part L, it is helpful to refer to TfL guidance on Delivery and Servicing Plans. In part M, to ensure consistency with London Plan and TfL, it would be helpful to refer to Construction Logistics Plans rather than Construction Traffic Management Plans.</p>	<p>TfL guidance on Parking Design and Management Plans is due to be issued for consultation and so a requirement should be added to the policy or accompanying text to require submission of a Parking Design and Management Plan where parking is provided.</p> <p>In F5 we welcome additional wording which states that 'In certain cases, where a development is forecast significant impact on on-street parking stress in an area, mitigation may be sought in the form of financial contributions towards the cost of reviewing and changing an existing CPZ or implementing a new one.</p> <p>We note that no changes have been made to F8</p> <p>We note that no changes have been made to part G</p> <p>In part H we welcome reference to provision of on street cycle parking where short stay cycle parking cannot be accommodated on site</p> <p>We note that no changes have been made to part I</p> <p>In part L we welcome the addition of a reference to TfL guidance</p> <p>In part M we welcome amended wording which now refers to Construction Logistics Plans</p>	<p>relevance of the guidance can then be referred to. An additional modification could be considered during the Examination process to add reference once it is published.</p> <p>Regarding not asking Developers of large sites in areas with a high PTAL to provide car club spaces, the Council's view (as set out in the response to the TfL comment on the Regulation 18 Plan (comment 1071)) is that we should allow residents to access car club vehicles, as they help reduce car ownership by providing people with the use of a car when, on the rare occasions they need one.</p> <p>Part G – noted, (as set out in the response to the TfL comment on the Regulation 18 Plan (comment 1071)) whilst the Council may consider provision of on-street disabled parking as part of a development, but only where there is absolutely no alternative to do so on site. Whilst this can be considered on a case-by-case basis, we do not want to encourage it in policy. There are significant constraints and costs associated with providing disabled parking spaces on-street, particularly in Richmond borough where on-street spaces can be scarce.</p> <p>Part I – (see above in relation to car clubs).</p> <p>Suggested modification: There is no proposed modification from the Council at this stage to add reference to guidance on Parking Design and Management Plans, but this could be added once the guidance is published by TfL.</p>		Plan Guidance on Parking Design and Management Plans is due to be issued for consultation in 2024.