



LONDON BOROUGH OF WANDSWORTH
LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC
WRITTEN STATEMENT

MAIN MATTER 19:
SUSTAINABLE TRANSPORT
(POLICIES LP49 - LP52)

THURSDAY 24 NOVEMBER 2022

Abbreviations

DfT - Department for Transport

LIP - Local Implementation Plan

LP – The London Plan

NPPF – National Planning Policy Framework

NR - National Rail

OA - Opportunity Area

PTAL - Public Transport Accessibility Level

TfL - Transport for London

WLP – Wandsworth Local Plan

Are the requirements of the Sustainable Transport policies justified by appropriate available evidence, having regard to national guidance, local context, and the London Plan?

The requirements of the policies in Chapter 20 ‘Sustainable Transport’ are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

The primary sources of evidence are as follows:

- [The Potential for Urban Logistics Hubs in Central London](#) (SD-038)
- [Wandsworth Environment and Sustainability Strategy](#) and [Action Plan](#) (SD-056)
- [Local Implementation Plan](#) (SD-058)
- [Corporate Business Plan 2021](#) (SD-059)
- [Mayor’s Transport Strategy](#)
- [Healthy Streets for London](#)
- [Vision Zero Action Plan](#)

The Transport policies of the Plan are in accordance, and support the implementation of, the Council’s detailed transport policies and proposals which are set out in its statutory Third Local Implementation Plan (LIP) (SD-058) of the Mayor of London’s Transport Strategy. The Local Plan, together with the LIP, provides a holistic understanding of how the transport environment in Wandsworth will evolve.

NPPF paragraph 105 sets out that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. NPPF Paragraph 106(a) also requires Local Plans to support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

Locating new developments in areas which reduce the need to travel is central to the Plan’s objectives and its spatial strategy as is the creation of an enhanced transport environment with a focus on providing alternatives to private vehicles. To achieve this the Plan supports

the delivery of sustainable travel initiatives and projects in the borough to encourage walking, cycling, the use of public transport and initiatives such as car sharing. The focus on sustainable travel also supports the Council's aims to reduce carbon emissions from transport, improve air quality, support active lifestyles and create a transport network which supports a mobile, affordable low-carbon future and ensure that the transport network operates safely and efficiently to meet the needs of all users.

Relevant objectives in the Plan include to:

- Reduce and mitigate environmental impacts including from pollution (such as air, noise, light, odour, fumes, water and soil) and secure improvements in air quality
- Reduce the need to travel by ensuring centres provide a full range of facilities and amenities and support employment, reinforced by digital infrastructure that enables home working or local business hubs that allow people to work close to where they live.
- Support development proposals which contribute to a safe, green, accessible and integrated transport system and which contribute to the efficient operation of London's overall transport system, with improved access by foot, bicycle or public transport to and from surrounding areas, particularly central London.

To ensure that forthcoming development meets these objectives as well as being in accordance with the NPPF, Policy LP49 Sustainable Transport sets out that proposals will need to reduce the need to travel and promote safe, sustainable and accessible transport solutions for all users, which minimise the impacts of development including congestion, air pollution and carbon dioxide emissions, and maximise opportunities for health benefits and providing access for all to services, facilities and employment.

The Healthy Street Objectives have been incorporated into the policy to support improvements in public health and development proposals will need to ensure they create spaces that encourage the efficient movement of pedestrians and cyclists over private cars. This should be achieved in the form of the provision of active travel infrastructure such as clear and well-designed cycle lanes, cycle parking infrastructure, and improvements to the main pedestrian thoroughfares. New forms of active travel infrastructure should be connected to the wider active transport network in the borough and London. Design of infrastructure should also take account of current TfL and DfT guidance. This policy, which is in general conformity with London Plan Policy T2 Healthy Streets, provides a list of criteria which will require developments to be people focused and meet the Healthy Streets objectives which put human health and well-being at the centre of transport planning, especially by providing for active travel and multi-destination trips.

The requirement to create safer and more sustainable transport environments supports the Council's Active Wandsworth Strategy which highlights some of the many benefits of sustainable transport, along with the important role it plays in helping Wandsworth function as a place to live, play, and work. In addition, TfL's Vision Zero Action Plan provides useful guidance for applicants as to how developments can create a safer transport environment and help eradicate deaths and serious injuries on London's roads.

NPPF paragraph 106(c) expects that planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development. Paragraph 106 (e) sets out that planning policies should provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.

The Council supports the protection of land and creation of large-scale transport facilities. The Plan, through Policy LP52, supports the principle of further extending the Northern Line to Clapham Junction and the routing of Crossrail 2 through Clapham Junction, Tooting and other regeneration areas of the borough, potentially connecting north-east London and Hertfordshire to south-west London and Surrey. This is in general conformity with London Plan Policy T1 Strategic Approach to Transport which designates Crossrail 2 as a strategic infrastructure priority and which is articulated in the Plan through Policy LP52 and the Clapham Junction Opportunity Area and Urban Heart Masterplan.

The Council also aims to establish improved rail links between South London and Heathrow, improve suburban rail services, remove the Wandsworth Gyratory, and help build new pedestrian and cyclist bridges to be delivered by other parties including Government, TfL, public transport companies and private developers.

Ensuring that existing land used for sustainable transport functions is protected is an important function of the Plan and the Council aims to maximise the existing sustainable transport infrastructure wherever possible. To achieve this and to ensure further strategic transport infrastructure is delivered in line with the NPPF Policy LP52 sets out criteria against which to assess development proposals when they involve land which is used for sustainable transport functions.

NPPF paragraph 107 establishes that if setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Parking and servicing are important pieces of the transport environment in Wandsworth and the WLP appropriately aligns with the NPPF. There must be sufficient parking and servicing in Wandsworth to ensure that essential needs are met but beyond that, they should be restricted. In order for Wandsworth to promote sustainable transport the amount of parking and servicing should be as efficient and lean as possible otherwise valuable land that could be used for better uses will be lost.

As an Inner London Borough, Wandsworth is required to be in general conformity with the London Plan’s parking policies. LP51 Parking, Servicing and Car Free Development is in general conformity with London Plan T6. The matter of ‘general conformity’ with London Plan Policy T6.1 is explored further in the Council’s Hearing Statement in relation to Main Matter 1.

Policy LP51 also requires that the design and location of cycle parking in Wandsworth should also be in line with London Cycling Design Standards to ensure it is fully accessible, convenient and secure.

NPPF paragraph 113 sets out that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

To ensure that the road network in Wandsworth can run smoothly and that congestion is kept to a minimum it is important that any new proposal does not add undue additional strain. Policy LP50 Transport and Development sets out that developments which will generate a large volume of trips should be focused in areas with high Public Transport

Accessibility Levels (PTALs) to help create the most sustainable transport environment. All proposals which generate a large volume of trips will be required to demonstrate how they meet the requirements set out in policy LP50. The Policy identifies when by a transport assessment, a transport statement or a travel plan will be required. This is in general conformity with London Plan Policy T4 Assessing and Mitigating Transport Impacts.

NPPF paragraph 106(b) sets out that planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned. The Council's engagement with such bodies is set out in its Hearing Statement in response to Main Matter 1.

LP49 (Sustainable Transport) - Is there clarity regarding the movement of freight via the river?

LP49 Sustainable Transport is considered to be sound as it does not prevent the increased use of the river for passenger and freight transport. In addition Policy LP50 Transport and Development Part E recognises the important role of the River Thames as a major transport route for freight and construction. Nevertheless, for the sake of clarity, the Council has suggested a proposed Main Modification in WBC-010 (Reference PPMM/116).

LP52 (Public Transport and Infrastructure) - Is greater clarity required regarding the Council's position relating to the Wandsworth gyratory system?

LP52 is considered to be sound. The Council's position in relation to the Wandsworth Gyratory is articulated in further detail in Chapter 4: Area Strategy for Wandsworth Town (and in response to Main Matter 3).

Do policies LP49 – LP52 provide clear direction as to how a decision maker should react to a development proposal?

The Council consider that Policies LP49 to LP52 are in accordance with Paragraph 16 of the NPPF, which requires that they are '*clearly written and unambiguous,*' and drafted in such a manner that it is '*evident how a decision maker should react to development proposals.*' Policies are positively worded unless local evidence suggests an alternative approach, and – where appropriate – set out the requirements for decision makers using a criteria-based approach. The threshold to which a policy applies are clearly set out. The justification for each policy and how it will be applied is clearly set out with the relevant support text.

The policies are clearly linked to the relevant environmental, social and economic objectives of the Local Plan, as set out in Chapter 2. These objectives, support the achievement of the Local Plan’s vision and form the basis of its spatial strategy. The Council has assessed the clarity and intent of the policies using the Planning Advisory Service Soundness Self-Assessment Checklist (SD-015), and in particular Q44 which asks ‘Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?’

Following the public consultation on the Pre-Publication (Regulation 18) Local Plan, changes were made to Policies LP49 to LP52, including to expressly address matters of clarity. The Council’s detailed responses and the outcome of the representations submitted with respect to the Local Plan are set out in the Council’s Statement of Consultation Regulation 18, Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Comments (SD-004), with those specific to policies LP49 to LP52 from pages 472 to 482.

The Publication (Regulation 19) Local Plan (SD-001) has been submitted to the Secretary of State for Examination. However, the Council has reviewed the representations received and have set out detailed comments within the Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council’s Responses (WBC-007 and WBC-008). The responses identify, where considered appropriate, a small number of specific changes to the wording of policies and the supporting text for the sake of clarity. These are set out within the Schedules of Proposed Main and Additional Modifications Suggested by the Council (WBC-010 References PPMM/116 - PPMM/119 and WBC-011 References PPAM/088 - PPAM/091), respectively.