

Transport for London – Written Statement on London Legacy Development Corporation (LLDC) Local Plan

LLDC Local Plan Examination
9 August 2019

We broadly support LLDC's Local Plan policies, which are aligned with TfL's goals, aspirations and relevant current and draft London Plan policy. We welcome the inclusion of text amendments to parts of the text in response to the comments we sent as part of LLDC's Local Plan Regulation 19 consultation. LLDC's revised Local Plan will not only embed the Healthy Streets Approach into local policy, but will also enable active travel and public transport to become the primary way to travel, capitalising on the opportunities provided by Stratford station.

Please find below additional further comments in relation to Matters 7.1 strategic transport, 7.2 promoting sustainable transport and Matter 13.1 (specifically in relation to vehicle access/parking).

Matter 7.1: Strategic transport

Is Objective 4 (securing the infrastructure to support growth and convergence); strategic policy SP4 (planning for and securing infrastructure to support growth and convergence); and policy T1 (strategic transport improvements), justified, effective and consistent with national policy as expressed in section 9 (promoting sustainable transport) of the Framework, and the relevant sections of the London Plan?

(i) Are the major schemes outlined in policy T1 realistic, i.e. either programmed or likely to be implemented within the plan period, or are they aspirational?

The schemes in policy T1 appear to be an appropriate mixture of those likely to be implemented during the plan period and more aspirational schemes.

At present, Stratford station is operating close to capacity during peak periods, particularly in the key interchange routes via the subways. This has led to a requirement for operational control systems and additional station staff. We have analysed a number of future demand scenarios and have found that by 2031, the south ticket hall and western and central subways will be too small to meet the long term level of demand. A range of interventions have been identified in the short, medium and long term, including new entrances and a new overbridge at the western end of the station. These would redirect some passenger flows, allowing the pinch points of entrances, subways and staircases to reach an acceptable level of crowding for typical demand patterns. Further feasibility work is now underway to investigate these options further and to identify appropriate methods of delivery and funding. As such, we welcome inclusion of upgrades to Stratford station in policy T1.

Improved connections to airports will be delivered through the delivery of the Elizabeth line, which will provide a direct connection to Heathrow Airport. Improved access to London City

Airport could be delivered through future DLR upgrades and potentially bus enhancements. Policy T.1 refers to the final route alignment potentially benefiting the area, which appears to be referring to a possible eastern extension of Crossrail 2. However, this is unlikely to be delivered by 3036 and thus should be regarded as aspirational. While improvements to the strategic road network may also be possible within the plan period, these need to reflect the needs of all modes, not just general traffic, and support the aims of the Mayor's Transport Strategy in general. In particular, increases in road capacity would not alleviate congestion if traffic is induced, vehicle dominance increased and conditions for walking, cycling and public transport worsened.

Further schemes that could support growth in the area are identified in Policy T3 and Table 10.1 (Indicative list of transport schemes) in the draft London Plan.

(ii) Does the evidence point to the DLR and/or other public transport modes having sufficient capacity to accommodate peak hour flows if the proposed development comes to fruition during the plan period?

Strategic Policy SP.4 sets out, particularly through SP.4 paragraph 1 and sections 7.3 and 7.5, how LLDC will work with partners to secure delivery of strategic transport projects. The MTS sets out current and future conditions on the rail and bus network.

The Elizabeth line will increase rail capacity at Stratford by 10 per cent and provide direct connections and reduced journey times to a number of locations to the west of Stratford, as well as relieving demand on the Jubilee line. On the Jubilee line itself, the Jubilee line Optimisation (JLO) project will increase capacity from 30 to 32 trains per hour in the central area, using the existing train fleet. We are delivering significant investment in the District and Hammersmith & City lines, which serve the southern part of LLDC, as part of the 4 Lines Modernisation (4LM) Programme to 2023. This will deliver re-signalling throughout the subsurface network, replacing expired assets and enabling the full utilisation of the new train fleet which is already in operation. Passengers will benefit from automatic train operation, faster run times, better reliability and increased frequencies.

On the DLR, Proposal 69 of the MTS sets out the long-term goal of increasing capacity by 120 per cent and improving frequencies across the network by the 2041 so that the capability for supporting growth can be maximised. In order to meet this target, we have recently announced a contract for 43 brand new walkthrough DLR trains,^[1] which will allow us to increase capacity across the DLR, including the Lewisham branch. The Government has also announced funding through its Housing Infrastructure Fund^[2] for an additional 14 DLR trains in last year's autumn statement. These trains will start coming into service from 2023. Once all of the trains are in place, we will be able to increase capacity on the DLR by 67 per cent overall. This includes an additional 65 per cent capacity on DLR services to Stratford via Bow Church (delivered by replacing the current short trains with full-length trains with a new walkthrough layout). Services to Stratford International via West Ham will increase in capacity by more than 4 times, as a result of both a tripling of train frequencies and replacement of short trains with full length ones.

^[1] <https://tfl.gov.uk/info-for/media/press-releases/2019/june/-contract-awarded-to-replace-oldest-dlr-trains>

^[2] <https://www.gov.uk/government/publications/housing-infrastructure-fund>

The MTS sets out the current strategy for bus network development, which is to redistribute resources to reflect changing patterns of demand, and demand for buses is expected to increase in outer London and areas where there is less comprehensive rail coverage. We will continue to secure contributions from new developments to enhance the bus network and have recently undertaken a consultation on proposals for changes to the bus network to support the opening of the Elizabeth line and the regeneration of Stratford town centre and the Queen Elizabeth Olympic Park. We will be seeking additional bus depot capacity across London to support the bus network.

Potential improvements to Stratford station are outlined above, while public transport capacity can also be complemented by improvements to cycling infrastructure, such as through a proposed extension of Quietway 6 or the planned £25m investment in significant improvements on Montfichet Road and Westfield Avenue.

Beyond our committed investment in the TfL Business Plan, which runs to 2024, we will review investment requirements and consider asset replacement and upgrade priorities and options, potentially including on the Central and Jubilee lines serving Stratford in the longer-term. Overall, crowding is expected to reduce in the short-term, particularly with the opening of the Elizabeth line, but is likely to start rising again by the 2030s, with higher pressure on key stations, without further investment. Phased interventions in network and station capacity are needed to meet the forecast demand to support consented and proposed additional jobs, homes and patterns of travel. We will also seek to secure, via appropriate mechanisms, contributions to make developments acceptable in planning terms and in line with the delivery of transport improvements. We will continue to review capacity requirements for the area on an ongoing basis, including through the annual publication of a revised TfL Business Plan, setting out five-year priorities for capital investment. As growth occurs across different parts of the city, we will identify priorities for investment and respond to changing conditions as appropriate.

(iii) Are all the key linkage/connectivity issues addressed in the Plan?

The evidence base reference documents have identified a wide range of potential interventions to address the severance issues in the LLDC area. We would welcome amended maps and plans that reflect our representations and suggestions.

Matter 7.2: Promoting sustainable transport

7.2: Are policies T2 (transport improvements); T3 (supporting transport schemes); T4 (promoting sustainable transport choices); T5 (street network); T6 (facilitating local connectivity); T7 (transport assessments and travel plans); T8 (parking); T9 (planning for pedestrians and cyclists); and T10 (using waterways for transport), justified, effective and consistent with national policy and the relevant policies in the London Plan? In particular:

Policies T.2-T.10 in LLDC's draft Local Plan are justified, effective and consistent with national policy and relevant policies in both the adopted and draft the London Plan, and will help to deliver good growth across the LLDC area. Policies promoting sustainable transport are in line with the requirement in the National Planning Policy Framework (NPPF) to protect and exploit opportunities for use of sustainable modes. This is also consistent with Policies 3.2, 6.2 – 6.15 and 7.2 in the adopted London Plan, which enable an efficient and effective transport system through the integration of transport and development, connecting London and ensuring better streets to actively encourage more walking and cycling, while also making better use of the Thames. This is further supported by Policies T1-T6, S115 and S116 in the draft London Plan: enabling mode shift to walking, cycling and public transport; applying the Healthy Streets Approach in the design of new development; ensuring sufficient transport capacity and connectivity to support London's growth; ensuring a consistent approach to assessing and mitigating the impacts of developments and promoting the use of waterways within the Legacy Corporation area.

The NPPF also sets out that maximum parking standards are acceptable where there is justification for 'managing the local road network' and 'optimising the density of development in city and town centres and other locations that are well served by public transport'. Both of these are necessary in LLDC: London has some of the highest levels of congestion and housing need in in the UK, as well as the most extensive public transport network. The NPPF also sets out the need for the planning system to deliver a sufficient supply of homes, promote healthy and safe communities and make the most effective use of land, all of which maximum residential parking standards contribute to, and for which are necessary. Applying parking restraint – both through Policy T.8 in LLDC's Local Plan and the maximum parking standards in the draft London Plan – is therefore essential to increase housing delivery and manage congestion on the road network.

(i) Can these policies cope with the estimated impacts of pedestrian and transport impacts which will be generated by large events, for example in relation to the capacity at Stratford Station?

We welcome LLDC Policy T7 requiring referable planning applications to submit a Transport Assessment. This is necessary to ensure the potential effects of proposals are properly assessed and can be mitigated.

For large events, the role of Local Plan policies and licensing will need to reach an appropriate balance between event calendar attendance and management, event concurrences, transport network (public transport and local highway) capacity, station capacities, event finish times and inter-dependencies between different surface modes and with rail modes. Decisions on planning applications can use Transport Assessments to determine whether the proposed mitigation would make development proposals for large-scale event venues acceptable in planning terms.

As described above, we have identified a range of interventions for Stratford station and are carrying out feasibility work is underway to investigate these options further. For the areas on routes between event venues and transport hubs, the permanent design of these areas and Event Management Plans or Frameworks will need to address the ease of use for implementing temporary measures (such as of barriers and crowd management and marshalling) and the impact of any road or off-highway closures on all users.

(ii) Should there be a presumption in favour of car-free developments in areas with a high PTAL, in line with the Draft London Plan?

The draft London Plan and Mayor's Transport Strategy (MTS) sets out the importance of good growth and increased densities across London alongside reducing vehicle dominance and enabling more active travel and public transport use. Greater parking provision is closely associated with higher levels of car ownership and use^[1] and parking policy is one of the most effective levers (of which there are few) to influence travel behaviour and manage demand for car travel.

We therefore strongly welcome the application of the draft London Plan car parking standards at the start of T8. LLDC's support for car-free development through this policy is crucial for reducing the dominance of vehicles on London's streets and supporting the increased delivery of housing, office and other development in well connected, sustainable locations. This is particularly important given Stratford's role as a potential satellite area of London's Central Activities Zone (CAZ) and the new jobs that would be associated performing that role. Car parking reduces the amount of growth that can be accommodated, both by physically taking up space and by generating traffic impacts, thereby reducing how much development potential can be realised. Ultimately, this would undermine the contribution LLDC could make to London's economic growth and housing need and impact on its place and environmental quality.

We would just like to clarify - given the phrasing of the question above - that all residential developments in inner London Opportunity Areas are required to be car-free, as are office developments across inner London. There are some variations by use classes - for example, the London Plan standards for retail and leisure uses within LLDC are related to PTAL. Our support for the policy is based on the understanding that this is the approach proposed, fully reflecting the draft London Plan but it would be helpful to clarify the wording of the policy to be clear about its relation to the different use classes.

(iii) Should the Plan set modal shift targets to promote sustainable transport?

We support the principle of the revised Local Plan providing, through engagement with TfL, a mode share target for the LLDC area, prioritising the allocation of space to active, efficient and sustainable modes. This will help achieve the Mayor's strategic mode share target for 80 per cent of all journeys in London to be made by walking, cycling and public transport by 2041. The mode share achieved will vary across different parts of London, with inner London expected to reach 90 per cent. Individual boroughs, including Hackney, Newham and Waltham Forest, will seek to achieve mode share that reflect their circumstance, which LLDC

^[1]Residential Car Parking (2017) Transport for London:
https://www.london.gov.uk/sites/default/files/london_plan_evidence_base_-_residential_car_parking.pdf

can support. As such, a target for LLDC should reflect the area's potential to achieve a considerably higher mode share than the London-wide target. This is particularly important given the location and characteristics of the Olympics Legacy SPG area, Lower Lea Valley OA and Stratford town centre (currently classified as a Metropolitan Town Centre, but has been identified by the draft London Plan as a potential International Town Centre) that shares the hyper-connectivity of the CAZ and has the potential to function as a CAZ satellite in the future. We therefore welcome further engagement on this matter.

(iv) Are parking and access issues in the centres properly addressed in the Plan?

We strongly support the parking policies outlined in Policy T8 of LLDC's Local Plan as described above.

Matter 13.1: vehicular access and parking within sub-area 4 (Bromley-by-Bow, Pudding Mill, Sugar House and Mill Meads)

13.1: Do policies 4.1 (a potential District Centre); 4.2 (bringing forward new connections to serve new development) and 4.3 (station improvements), together with Site Allocations SA4.1 (Bromley-by-Bow); SA4.2 (Sugar House Lane); SA4.3 (Pudding Mill); SA4.4 (Three Mills); and SA 4.5 (Bow Goods Yard (Bow East and West)), justified, effective and consistent with national policy and the relevant policies in the London Plan

(iv) Safe and acceptable vehicular access and parking considerations

SA4.5 Bow Goods Yards (Bow East and West) refers to the potential for intensification of rail uses and the possibility of long-term opportunities for an element of land release, subject to a number of conditions. We suggest that the following is added to these conditions:

Strategic and local need for freight capacity over the plan period are considered in the forthcoming masterplan, particularly in relation to opportunities to increase rail freight in support of mode shift from road vehicles

Increasing the volume of freight handled by rail rather than road is supported by the Mayor's Transport Strategy, the Mayor's Freight Action Plan and both the adopted and draft London Plans. As well as potentially enabling the release of land, intensification could alternatively/also enable greater levels of rail freight to be handled by the site (providing existing or planned passenger services are not adversely affected), supporting freight movements to be made by rail instead of road, helping to reduce traffic, emissions and road danger.