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17 March 2025

Dear Sir/Madam,

**Re: Proposed Main Modifications to the Local Plan**

*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.*

Thank you for giving Transport for London (TfL) the opportunity to comment on the proposed main modifications to the Local Plan. As you are aware, the London Plan 2021 was published in March 2021 and now forms part of Richmond's development plan.

We previously agreed a statement of common ground (SOCG) and are pleased to note that a number of our points have been addressed, there are a small number of issues outstanding which we regard as not in line with the 2021 London Plan. The appendix contains specific suggested edits and updated comments from TfL on the Proposed Main modifications of Richmond's draft Local Plan

Our updated responses to specific points in the draft local plan are set out in the attached appendix. We look forward to continuing to work together and are committed to continuing to work closely with the GLA to deliver integrated planning and make the case for continued investment in transport capacity and connectivity to enable Good Growth in Richmond and across London.

Yours faithfully,



Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning


Email: 



## Appendix: Specific suggested edits and updated comments from TfL on the Proposed Main modifications of Richmond's draft Local Plan

Section	Track change/comment – Reg. 18	Updated track change/comment – Reg. 19	Statement of common ground conclusion	Updated TfL response
Site Allocation I: 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 <i>'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').'</i> Part L states that <i>'Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous</i>	<b>On-going</b> in relation to London Plan parking standards in Site Allocation I. TfL preference is to remove the word 'retain' even if the word 'minimise' is not adopted instead.	TfL maintains that wording should be changed to use the word 'minimise'. To ensure the site allocation isn't misinterpreted as requiring the existing level of provision, the use of the word 'retain' should be changed to 'minimise'.

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		<i>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.’</i> Therefore, to be consistent with London Plan Policy T6 the site allocation should be amended as follows: ‘ <b>retain</b> <b>minimise</b> car parking provision in line with <b>current</b> London Plan standards.’		
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	<b>On-going</b> 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	London Plan policy 10.6.4 states that ‘ <i>When calculating general parking provision within the relevant standards, the starting point for discussions should be the highest existing or planned PTAL at the site, although consideration should be given to local circumstances and the</i>

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		<p>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 <i>'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.'</i> 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</p>	<p>reads '...associated car parking provision is expected to be in line with London Plan standards'</p> <p>This would be consistent with the representation on behalf of Sainsburys</p>	<p><i>quality of public transport provision, as well as conditions for walking and cycling.'</i> As shown in the map below, this site includes a PTAL 5 grid with coordinates Easting: 519071, Northing: 175650. In the context of Car Parking this site should therefore be treated as PTAL 5.</p>  <p>The London Plan required retail development in PTAL 5 to be car free and so an expectation that associated car parking should be re-provided is inappropriate. The word</p>

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				're-provided' should be removed as this could be misleading. Instead it should read '...associated car parking provision is expected to be in line with London Plan standards'.
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'	<b>On-going</b> Although TfL welcomes the more accurate PTAL score of 0-2 the subjective wording 'worst to poor' should be removed from the modification.	TfL still maintains that subjective wording 'worst to poor' should be removed from the modification.
Site Allocation 35: Stag Brewery, Lower Richmond	We note the statement that <i>'The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that</i>	We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus	<b>On-going</b> in relation to the Avondale Road bus station. TfL maintains its position that the more flexible wording regarding bus standing should be adopted	We reiterate our previous comments that the proposed bus standing within the Stag Brewery site should be regarded as additional to, and independent of, the bus

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Road, Mortlake	<p><i>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></p> <p>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</p>	<p>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.'</p>	<p>because the Avondale Road bus station is a separate issue.</p>	<p>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.'</p> <p>TfL would also like to note that bus standing/turning area within the site was to allow for future route</p>

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	stops and turning facility at Avondale Road.			extensions, not to replace Avondale Road bus station. In the original planning permission, the feasibility of extending bus route 209 to the Stag Brewery site was investigated, allowing for the closure of Avondale Road bus station, but this was deemed unviable. Areas of the development which were proposed for bus standing/turnaround facility safeguarding were disregarded by Richmond council and that land now forms part of a community park in the latest planning application.