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[by email only]

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3 August 2020

Dear Sir/ Madam,

Re: Fitzrovia West's Neighbourhood Plan 2019 to 2034 – Reg. 16 consultation

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).

Thank you for giving TfL the opportunity to comment on Fitzrovia West's draft Neighbourhood Plan 2019 to 2034. We have previously commented on the draft Neighbourhood Plan and our Reg. 14 response is enclosed for information.

The draft London Plan has now been through its Examination in Public (EiP), and the 'Intend to Publish' version was issued in December 2019. The draft Plan is a material consideration in assessing local policy, and given its advanced stage in the adoption process, we will have regard to it when assessing and responding to local planning policy consultations, including Fitzrovia West's draft Neighbourhood Plan.

Neighbourhood Plan policies should be developed in line with relevant draft London Plan policy and TfL's aims as set out in the Mayor's Transport Strategy (MTS). In particular, the Neighbourhood Plan should explicitly refer to the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network. In this context we welcome the additional references to the Healthy Streets Approach which have been made in response to TfL's previous comments.

New development needs to be planned around space-efficient modes of transport. This approach is fundamental to making the best use of land to increase housing delivery. Policies that prioritise walking, cycling and using public transport in the location and design of new development and associated public realm are therefore supported.

Comments on specific policies including changes made since the Reg. 14 response are as follows:

We welcome the Neighbourhood Plan's promotion of sustainable and improved public realm which will help create a healthier and less vehicle-dominated Westminster. However, as stated in our previous response we would welcome the support and inclusion of Crossrail 2 into the draft Neighbourhood Plan.

We also strongly encourage reflecting the Mayor of London's Vision Zero approach to eliminating all deaths and serious injuries on the road network by 2041 in the Plan's Vision Statement. It is neither inevitable nor acceptable that anyone should be killed or seriously injured when travelling in London, and embedding the Vision Zero action plan into local policy will reduce road danger for everyone and create safe streets for walking and cycling.

Given, that the whole of the area of West Fitzrovia has a Public Transport Access Level (PTAL) of 6b, we especially welcome and support Policy PR2 (g) in this plan which states that off-street car parking should not be provided except for disabled persons as set out in higher tier plans. This is an improvement on the previous wording of MD2 (g) and removes any inconsistencies. However, it would be helpful if this could go further in stating that residents of new development should be excluded from eligibility for residents' parking permits. This approach would be in line with the Soho Neighbourhood Development Plan and would help to meet the objective of reducing pressure on on-street parking.

We welcome the change made to Policy GS2 – 3(d) in response to TfL's previous comments which recognises that reductions in parking may help to achieve the Plan's wider objectives of improving public realm and introducing new, more productive uses.

Car-free development in this part of London is required to reduce the impacts of growth and densification on streets, which are fundamental in moving people and goods. This approach reflects the borough's connectivity by public transport and access to local jobs and services, which are among the highest of any part of London, and indeed any city in the world.

In policy T2 we would reiterate previous comments that mention should also be made of other measures such as off-street deliveries and out of hours servicing in order to reduce the impact of freight vehicles in the area. The use of all types of active and sustainable freight, including but not necessarily restricted to walking freight and cycle freight such as cargo cycles should also be referenced in this policy.

We look forward to continuing our work together in supporting implementation of Neighbourhood Plan policies. We are committed to continuing to work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock development and support future growth in West Fitzrovia and across London more widely.

I trust that the above provides you with a better understanding of TfL's position on Fitzrovia West's draft Neighbourhood Plan. Please do not hesitate to contact me should you have any queries or clarifications about these comments.

Yours faithfully,

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