

neighbourhoodplanning@westminster.gov.uk

**Transport for London**  
City Planning  
5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

Phone 020 7222 5600  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

9 July 2020

Dear Sir/ Madam,

**Re: Soho'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 Soho's draft Neighbourhood Plan. Our role is to consider the strategic transport aspects of growth and development in the statutory context of the London Plan and on behalf of the Mayor of London. 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 Soho'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.

This means 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 would therefore be encouraged. We strongly support embedding the Mayor's Healthy Streets Approach in Soho's draft Neighbourhood Plan. This will demonstrate how streets can be further enhanced in order to create a healthier city, in which all people are included, can live well, and where inequalities are reduced.

We welcome the Neighbourhood Plan's promotion of sustainable and improved public realm which will help create a healthier and less vehicle-dominated Westminster. We also welcome the support and inclusion of Crossrail 2 into the draft Neighbourhood Plan. Comments on specific policies including changes made since the Reg. 14 response are as follows:

#### Policy 16 – Car Free Residential Developments

Given, that the whole of Soho has a Public Transport Access Level (PTAL) of 6b, the requirement that residential development should be car free except for disabled persons car parking and that occupants of new housing have no right to apply for a residents parking permit is strongly supported and consistent with transport and parking policies in the London Plan

Car-free developments in this part of London are especially important to reduce the impacts of growth and densification on streets, which are fundamental to moving people and goods as well as places in their own right. 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

TfL notes that there is still a reference to car clubs providing an alternative to car ownership in the accompanying text. However, the London Plan does not support their provision in the Central Activities Zone (CAZ) and TfL expressed reservations about the appropriateness of car clubs in a well-connected location such as Soho in the Reg. 14 response which is reproduced below:

In some circumstances, car clubs can provide an alternative to private car ownership. However, it should be noted that car clubs are not public transport and therefore do not contribute towards the Mayor's aim for mode shift to walking, cycling and public transport. We are concerned that this nuance is not reflected in policy. In an extremely well-connected borough like Westminster, where car ownership is low, car club provision risks offering more opportunities for car use by people who do not currently have access to a car than it does of reducing private ownership (unless paired with other measures such as reducing the overall supply of on-street private parking spaces). As such, the draft London Plan does not support their provision in the CAZ. There may be opportunities to use car clubs to make more efficient use of the kerbside and reduce parking stress, but only if they are paired with a reduction in the amount of kerbside space available to residents' private cars.

Policy 17 – We strongly support the future use of these two car park sites for micro-consolidation and any future plans should ensure that the highest priority is given to last mile deliveries by foot and cycle, with electric vehicles being used as a last resort. We welcome changes to the policy in response to our comments on the Reg. 14 Plan which cautioned against safeguarding of the car parks for a minimum five year period. As we previously stated, the continued use of these sites as car parks contributes to congestion, road danger and vehicle dominance, and encourages car use in a part of the city where it should be discouraged. If proposals for redevelopment into other uses come forward, they should be judged on their merits. Consideration can then be given to how proposals might include an element of micro-consolidation while also allowing other uses appropriate to Soho to form part of any redevelopment.

Policy 19 – We welcome changes to the reasoned justification in response to TfL’s Reg. 14 consultation feedback

Policy 27 – We welcome the references to the Healthy Streets Approach and Vision Zero Approach which have been added in response to TfL’s Reg. 14 consultation feedback

We trust that these comments are useful and can be taken into account when finalising the document.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]