
Maida Hill Neighbourhood Plan submission - TfL comments

From Richard Carr <[REDACTED]>

Date Thu 28/11/2024 15:34

To Neighbourhood, Planning: WCC <neighbourhoodplanning@westminster.gov.uk>

Cc Richard Carr <[REDACTED]>; Monika Jain <[REDACTED]>; Josephine Vos <[REDACTED]>; Clare Seiler <[REDACTED]>

Caution: This email originated from outside of the organisation. Do not click links, open attachments or reply, unless you recognise the sender's email address and know the content is safe.

Thank you for consulting Transport for London (TfL) and providing us with the opportunity to submit late comments. We apologise for the delay and hope that these comments can still be taken into account when the Neighbourhood Plan is finalised. The following response has been prepared by officers in TfL Spatial Planning reflecting TfL's statutory role as the strategic transport authority for London. It is separate from any response submitted by Places for London in their capacity as a landowner and potential developer.

We welcome the opportunity to comment on the draft Maida Hill Neighbourhood Plan. We commend you on some of the innovative approaches put forward in the Plan to improve the public realm, reduce vehicle domination and prioritise active and healthy travel. We welcome some of the positive changes made in response to our Regulation 14 representation although there are a couple of instances where we recommend alternative wording to better reflect our comments.

We set out our responses to specific policies and projects below:

Policy MHLN2: Design principles for designated centres

We welcome Part 2 of the Policy which states that 'Proposals for development should, wherever possible, contribute to wider public realm improvements and supporting initiatives that improve the quality of the pedestrian environment, including opportunities to rationalise parking and delivery areas, introducing more green space and providing opportunities for outdoor seating and dining.'

Project MHi: Delivery and parking strategy

We welcome Part 2 of the Policy which states that 'As well as tackling issues of improved enforcement action on illegal parking, this should also explore opportunities to rationalise parking and delivery areas, and open up new areas of publicly useable space, greenery and outdoor seating (which may potentially include the adaptation of underused parking bays for alternative uses)...'

Policy MHD4: Safer places by design

We welcome changes to the wording in response to our Regulation 14 representation so that Part 2 now reads 'Development, including public spaces, should be designed such that it is safe to use, and perceived to be safe to use, by all members of the community throughout the day, including during hours of darkness.'

Project MHk: Public realm projects

We welcome proposals to improve the public realm at the listed locations. We welcome changes to the wording in response to our Regulation 14 representation so that Part 2 now reads 'Where public realm projects are taken forward, the Forum is keen for these to follow the Healthy Streets approach to design, and

embed the Vision Zero objective for road safety. Such projects should support improvements for active travel, whilst also taking account of bus operations and supporting infrastructure.'

Project MHn: Pocket Parks and Parklets

We welcome proposals for pocket parks and parklets that involve the rationalisation of existing road space, including the remodelling of road junctions and/or the replacement of parking bays

Project MHo: Raingardens and street tree planting

We welcome proposals for greening streets and exploring how existing road space might be rationalised to introduce 'raingardens' and Sustainable Drainage Systems (SuDS) into the streets

Policy MHS1: Active and healthy travel

We welcome the positive approach to supporting active and healthy travel set out in this policy. In part 4 we welcome the addition of a reference to London Plan standards but recommend that it is reworded as follows 'Proposals for commercial, leisure and community uses shall ~~be in line with London Plan standards (or future updates to these)~~, support and enable active travel through inclusion of safe, secure, dry and convenient cycle parking **in line with London Plan standards (or future updates to these)** and changing facilities where appropriate.'

Project MHq: Active, Healthy and Liveable neighbourhoods

We welcome proposals for new and or improved walking and cycling routes in principle although we have not studied the feasibility of specific measures/locations identified in Part 1a, b or c. In part 3 we welcome the additional wording in response to our Regulation 14 representation to clarify the current approach to the use of e scooters.

Project MHR: Garden streets, Homezones and Play Streets

We welcome the intention to explore opportunities for these concepts including pilot projects and or temporary street closures for specific events

Policy MHS2: Mobility hubs

We note that electric vehicle (EV) charging points for cars are listed as one of the elements of mobility hubs in MHS2 Part 1. Care needs to be taken that the inclusion of charging points does not result in the mobility hub being dominated by vehicles. Any provision of EV charging should result in overall reduction of parking spaces in the area rather than being additional spaces for car charging. It is important that mobility hubs are designed and located to avoid obstruction to movement on foot, cycle or buses. We welcome wording in paragraph 9.19 which states 'Where such hubs are to be provided, they should be designed to avoid conflict between users of different transport modes. Where any technology or cabling associated with e-vehicles or similar is incorporated, it should not cause obstruction or hindrance to pedestrian movement.'

We recommend that MHS2 Part 3 is expanded to read 'Where EV charging points are provided, cables must be directed away from the pavement so as not to cause hindrance to pedestrians. **The location and design of EV charging points should minimise impacts on people walking and cycling.**'

We note that MHS2 Part 5 reads 'Proposals that include improvements to existing docking points and bus stops / stands to act as a mobility hub will be supported.' This appears to be in response to our Regulation 14 representation but unfortunately our intention was not made clear. The point being made was that existing bus stands need to be protected when changes to kerbside uses are proposed. We do not support the creation of mobility hubs being based around bus stands because the stands are designed for operational purposes and there would be potential conflicts if facilities for cycling or electric vehicle infrastructure were introduced. To avoid this we strongly recommend the wording is altered as follows: 'Proposals ~~that include improvements to existing docking points and~~ **for mobility hubs should avoid any impact on existing** bus stops / stands ~~to act as a mobility hub will be supported.~~' Support for improvements to existing docking points should already be covered by MHS2 Part 1a and the addition of paragraph 9.15 which reflects TfL's Regulation 14 representation and is welcomed.

Policy MHS3: Car free development

We note that Part 1 states that 'Based upon the location of and public transport accessibility levels in Maida Hill, proposals for all development should seek to be car free, except where required for disabled persons'. We recommend that this is more clearly expressed to ensure that it is consistent with the London Plan and Westminster City Plan. This can be achieved by removing the words 'seek to' as shown 'Based upon the location of and public transport accessibility levels in Maida Hill, proposals for all development should ~~seek to~~ be car free, except where required for disabled persons.' We welcome Part 2 'Proposals that incorporate active travel measures and provision of mobility hubs will be supported.'

We hope that these comments are helpful and can be incorporated in the final version of the Neighbourhood Plan. I will be leaving TfL so please send any future communication to

TfL Spatial Planning SpatialPlanning@tfl.gov.uk

Best wishes
Richard Carr

Richard Carr | Principal Planner - Spatial Planning (He/Him/His)
TfL Planning, Transport for London
E: [REDACTED]

I work part time and so there may be a short delay in responding to emails

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process

For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

This message has been scanned for malware by Forcepoint. www.forcepoint.com