



**London Borough  
of Hounslow**

**Hounslow Local Plan 2020-2041**

**Statement of Common Ground**

**Between**

**London Borough of Hounslow**

**And**

**Transport for London (TfL)**

**Version no. 9**

**27/08/2025**

## 1. Introduction

- 1.1. This Statement of Common Ground (SoCG) has been prepared between the London Borough of Hounslow (LBH) and Transport for London (TfL). It seeks to inform the independent examination of the proposed submission version of the Hounslow Local Plan 2020-2041 and will be submitted to the Planning Inspector alongside the local plan and other supporting documents.
- 1.2. LBH adopted their Local Plan 2015-2030 Volumes 1 & 2 in 2015. As instructed by their Inspector at that time, LBH went on to undertake a partial review of the local plan focusing on 2 key growth areas: the Great West Corridor and Heathrow (known as the 'West of Borough') opportunity areas. Following extensive consultation, LBH submitted three development plan documents (DPDs, one for each area and an update to the Vol.2 Site Allocations DPD) for examination in December 2020, with examination hearing sessions taking place in November/December 2021. Following the hearing sessions, a number of procedural issues were identified which led LBH to withdraw these DPDs and pause work on a Focused Issues Review of the Local Plan Vol.1.
- 1.3. LBH undertook a Regulation 18 consultation between 1<sup>st</sup> November and 17<sup>th</sup> December 2023 focusing on a proposal to consolidate the emerging DPDs into a single Local Plan document, and to update emerging policies in line with relevant considerations. Following this, LBH prepared updates to key evidence base documents and developed the proposed submission version of the Hounslow Local Plan 2020-2041, undertaking a Regulation 19 consultation on the draft Local Plan between 6<sup>th</sup> September and 28<sup>th</sup> October 2024. LBH is now in the process of analysing and collating responses received and preparing any additional work required (including agreeing SoCG with relevant parties) prior to submission to the Secretary of State for examination.
- 1.4. TfL are the integrated transport authority in London and a prescribed body under the Town and Country Planning (Local Planning) (England) Regulations 2012. TfL have undertaken extensive engagement with LBH throughout the various stages of plan-production to this point. A full record of engagement to date is provided in section 2 below.
- 1.5. The SoCG sets out both parties' agreed positions in relation to strategic cross boundary matters identified during duty to cooperate meetings and as set out in TfL's Regulation 19 representation and subsequent correspondence.

## 2. Background

- 2.1. LBH and TfL have engaged with one another to discuss duty to cooperate matters during the preparation of the draft Hounslow Local Plan 2020-2041.
- 2.2. Prior to initiating the current draft of the Hounslow Local Plan, engagement took place on the now-withdrawn Local Plan Review for the Great West Corridor, West of Borough, and Site Allocations DPDs. This process resulted in the development of the [LB Hounslow Joint Statement of Common Ground](#).
- 2.3. More recently, the TfL has engaged with LBH on the production of the single Local Plan, now known as the Hounslow Local Plan 2020-2041.

2.4. LBH sent a Regulation 18 duty to cooperate meeting request on 20/10/2023 and a meeting was held on 22/11/2023. The key matters discussed are listed below:

- Providing GLA updates regarding The Planning for London programme and updates on several London Plan Guidance (LPG) documents.
- LBH Housing Strategy: LBH aims to align housing requirements with the London Plan, considering capacity-based approach post-10-year period.
- Employment Land Review: LBH updating the Employment Land Review (ELR) to adapt to post-Covid circumstances and ensure conformity with the London Plan.
- Tall Building Policy: LBH will review tall buildings policies in the borough, conducting a "sieving exercise" (as per Policy D9) to identify suitable locations using heat mapping.
- Metropolitan Open Land (MOL) and Green Belt (GB) Review: LBH to review the potential release of Metropolitan Open Land (MOL) and Green Belt (GB) at Bedfont, considering changes to the Southern Rail access to Heathrow (SRtH) and housing needs.
- Southern Rail access to Heathrow (SRtH) is delayed, which TfL suggests this needs to be addressed in the strategy.
- The Great West Corridor (GWC) relies on infrastructure to support growth, which TfL mentions may lead to potential scrutiny at the Examination in Public (EIP).
- TfL views the West London Orbital (WLO) project appears more viable than the Southall Shuttle, which faces uncertainty. Bus network enhancements and the Super Loop could be explored as alternatives.
- LBH evidence base is being reviewed, considering post-Covid impacts and potential changes to site allocations.
- LBH confirms active travel proposals may require further examination as they are now more advanced.
- LBH to appoint transport study consultants after the Regulation 18 consultation if necessary.
- National Highways will assess whether the evidence base has been refreshed, with ongoing Duty to Cooperate (DTC) engagement planned.

2.5. TfL agreed to meeting LBH for a Regulation 19 stage duty to cooperate meeting for the Hounslow Local Plan 2020-2041 on 01/10/2024. The key matters discussed are listed below:

- Transport Policies: LBH updated transport policies EC1 and EC2, focusing on climate change targets, Vision Zero, prioritising active travel and Healthy Streets, carbon reduction, air quality improvements, and the inclusion of SPDs to enhance infrastructure quality.
- Developer Considerations: TfL highlighted the need for additional land for the WLO project, discussed upcoming consultations on active travel routes, and addressed the potential inclusion of new routes in the transport strategy, while confirming that workplace parking levies are not being considered. LBH clarified that the current policy promotes WLO development without safeguarding land.
- Transport Infrastructure and Connectivity Maps: TfL acknowledged alignment on Southern Rail Access to Heathrow and emphasised the need for a clear aspirational active travel route map, with LBH noting recent updates to transport route maps.
- Car-Free Development and Site Allocations: Discussion centred on promoting car-free developments, the need for clearer policy wording on site allocations, and the importance of enhancing connectivity rather than just improving PTAL scores.

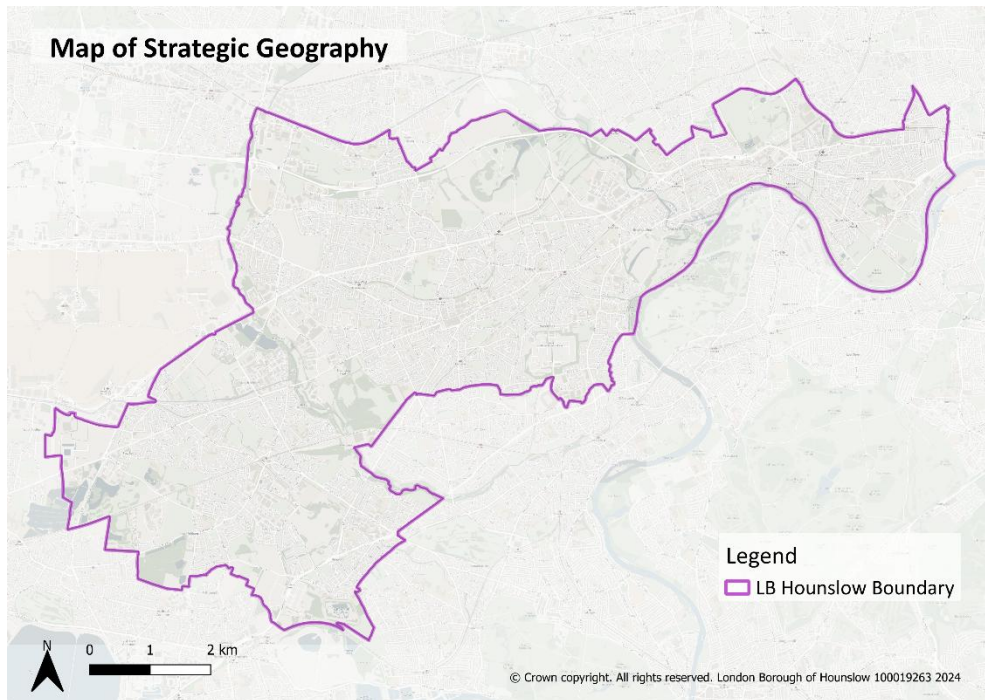
- Piccadilly Line Upgrade and Bus Infrastructure: TfL noted funding challenges for Phase Two of the Piccadilly Line upgrade, impacting Turnham Green, and emphasised improving bus access and infrastructure in Cranford and Heston for better connectivity to the Southall Elizabeth Line.
- Bus Garages and Alternative Sites: TfL called for clearer references to bus garages in site allocations, noted ambiguity around the Lampton bus depot status, and stressed the need for policies that ensure replacement strategies for essential facilities.

2.6. A representation was received from TfL at Regulation 19 stage.

2.7. A “follow up” meeting was requested by LBH to TfL on 27/01/2024. It was agreed between both LBH and TfL that the meeting was not needed at this stage.

2.8. This SoCG has been undertaken in order to demonstrate the cooperation between both parties, and to set out the agreements reached on the relevant strategic matters relating to the production of the proposed submission version of the Hounslow Local Plan 2020-2041.

### 3. Strategic Geography



**Figure 1:** Map of strategic geography

- 3.1. The map above (figure 1) describes the strategic geography considered for cooperation on strategic matters as part of this Statement of Common Ground. The area contains the administrative areas of LB Hounslow.

#### 4. Strategic Matters and Record of Agreement

- 4.1. Through ongoing duty to cooperate engagement between LBH and [Transport for London], the following key strategic matters have been identified:
- **Matter 1: Strategic Transport Infrastructure Planning**
  - **Matter 2: TfLs detailed comments submitted as part of the Regulation 19 Consultation.**
- 4.2. These matters are set out in more detail below, with a description of the relevant background to the matter in question and a record of agreement provided (with any agreed modifications set out in the table at Appendix A below).
- 4.3. **Matter 1: Strategic Transport Infrastructure Planning**

##### *Background*

- 4.3.1. TfL have been consulted on the policy preparation and strategic policies in the emerging Hounslow Local Plan (including Chapter 10: Enhancing Connectivity) which have been prepared in line with the findings of the Strategic Transport Impact Assessment and are consistent with both the NPPF and London Plan. LB Hounslow will continue to liaise and consult TfL in preparing the Local Plan.

##### *Record of Agreement*

- 4.3.2. TfL will continue to work with LB Hounslow to identify the necessary interventions that would enable any strategic public transport based schemes to be delivered and operate effectively, in order to ensure that they are well integrated with the wider network and do not result in unacceptable impacts to either stations or rail services.
- 4.3.3. LB Hounslow and TfL will continue to work together to ensure that policies and projects relating to Gunnersbury Station are implemented in order to improve accessibility and to accommodate growth within the area.
- 4.3.4. LB Hounslow, other West London local planning authorities and Transport for London will continue to work together to develop the case for the West London Orbital and identify the steps necessary to implement the project. Both parties agree to propose a further modification to Policy EC1 C to include an additional clause referencing the need for policy protection to safeguard land that has, in collaboration with TfL, been identified to deliver the West London Orbital (see Appendix A).
- 4.3.5. TfL and LB Hounslow will continue to work together, where necessary, on any future schemes that improve active travel along the Great West Road corridor.
- 4.3.6. TfL and LB Hounslow will continue to work together to ensure policies and projects relating to Hounslow West Station Step-Free access are implemented in order to improve accessibility and to accommodate growth within the area.
- 4.3.7. TfL and LB Hounslow will continue to work together to ensure that the planned upgrades to the Piccadilly Line (currently unfunded) are delivered.

### ***Outstanding Matters***

4.3.8. There are no outstanding issues relating to this matter at this time.

#### **4.4. Matter 2: TfL Regulation 19 detailed comments**

##### ***Background***

4.4.1. In 2024 LBH prepared updates to key evidence base documents and developed the proposed submission version of the Hounslow Local Plan 2020-2041, undertaking a Regulation 19 consultation on the draft Local Plan between 6<sup>th</sup> September and 28<sup>th</sup> October 2024. TfL submitted their representation to this Regulation 19 consultation by email on 21<sup>st</sup> October 2024.

##### ***Record of Agreement***

4.4.2. LBH are grateful to receive TfL's representation to the Regulation 19 Consultation.

4.4.3. Within the Regulation 19 representation, TfL welcome the policies and site allocations in the emerging Local Plan which aim to rebalance the transport system towards walking and wheeling, cycling and public transport, promote car free or low car developments and apply a Healthy Streets Approach to deliver liveable neighbourhoods.

4.4.4. TfL welcome the broad support for public transport and active travel improvements.

4.4.5. TfL welcome the specific support within the emerging Local Plan for West London Orbital, including the intention to secure transport improvements as mitigation for development impacts.

4.4.6. TfL have provided detailed comments on a number of Policies and Site Allocations as part of their representation which includes suggested modifications and observations on omissions. LB Hounslow have responded to each of these comments in detail in Appendix A.

4.4.7. LBH agree to present modifications set out in Appendix A to the inspector as part of the examination process.

##### ***Outstanding Matters***

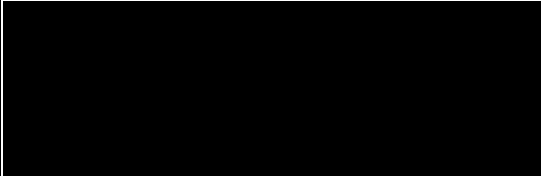
4.4.8. Many of the modifications suggested by TfL through their Regulation 19 representation have been agreed with and will be presented to the Inspector. However, in some instances, the proposed modifications that have been suggested by TfL are not agreed with and LBH will not be including these in the Table of Modifications. These can be seen in detail in Appendix B below but are specifically in regards to Site 80 – 34 Staines Road, Site 107 – Sainsburys Chiswick and Site 117 – Treaty Centre, Site 103 West Middlesex Hospital, Policy TC2 clause G, Policy CC2 clause U, and Policy EC2 clause M.

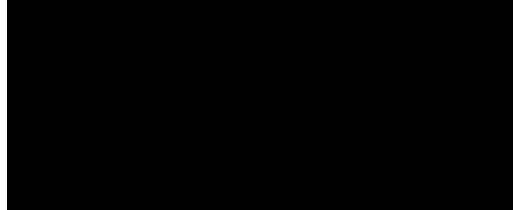
## 5. Governance Arrangements

- 5.1. It is agreed that informal discussions will occur between both parties on the strategic matters referred to in this Statement of Common Ground in the form of officer level meetings at least once every quarter through the LBH/TfL transport/planning quarterly liaison meeting.
- 5.2. It is agreed that this Statement of Common Ground will be reviewed by both parties at a joint duty to cooperate meeting which will be held on an annual basis.

## 6. Signed confirmation

- 6.1. The contents of this Statement of Common Ground are agreed for the purposes of the examination of the proposed submission version of the LB Hounslow Local Plan 2020-2041.

<b>Signed on behalf of LB Hounslow</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
<b>Vincent Lacovara Director of Planning and Buildings</b>		<b>27/08/2025</b>

<b>Signed on behalf of TfL</b>		
<b>Name and position</b>	<b>Signature</b>	<b>Date</b>
<b>Josephine Vos London Plan and Planning Obligations Manager</b>		<b>19/08/2025</b>

## APPENDIX A: Table of Agreed Modifications and Positions

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
Objective 8 – Enhancing Connectivity	Part C should be amended as follows: ‘To reduce unnecessary car travel, reduce congestion, improve air quality and health and well-being through the delivery of targeted <del>highway</del> improvements to <b>create Healthy Streets</b> , electric vehicle infrastructure, better car-sharing options, <b>car free development in well-connected locations</b> and limiting <b>the amount of</b> car-parking <del>elsewhere</del> . <del>Offers</del> .	<b>Comments noted. The Plan is supportive of a Healthy Streets approach, with Healthy Streets embedded in numerous policies across the Plan. It is not considered that the proposed modification addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</b>	N/A
Figure SS1 – Spatial Strategy for Ten Districts	This is potentially confusing in only showing three proposed public transport connections. It does not include West London Orbital which is a priority for Hounslow and TfL but it does show a Western Heathrow to Elizabeth line link which is entirely outside the borough and is not mentioned in any Local Plan policies. The indicative route shown for Southern Rail Access to Heathrow could also provide for greater flexibility. The indicative public transport connections in figure SS1 need to be amended to include West London Orbital to ensure consistency with Policy EC1 and Figure EC1.2.	<b>Comments noted, Whereas the proposed modification does not address either soundness or legality, it is considered that by modifying Figure SS1 as suggested, there will be greater clarity and a clearer link between Policy EC1, Figure EC1.2 and Figure SS1. As such, Figure SS1 will be modified to include WLO.</b>	<b>Modification to be displayed in Figure SS1 and explained in Mapping modification table.</b>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
P1 – Great West Corridor	<p>While we are supportive in principle of measures that improve active travel along the Great West Road corridor, we would need to work closely with the borough on any proposed improvements so that any impacts on TfL’s role as highway authority are considered from the outset.</p> <p>We welcome the inclusion of part O, although this should be strengthened to read ‘Requiring development in this area to be <b>car free or</b> close to car-free in order to promote active and sustainable travel.’</p>	<p><b>Comments and support noted. The need for a continued working relationship between TfL and LBH will be required to deliver transport infrastructure and this has been recognised as a key strategic matter that will need to be met in an ongoing duty to cooperate in Matter 1, above.</b></p> <p><b>Comments on Part O noted. LBH agree that car free should be the starting point for development in the GWC where possible and for clarity have proposed a modification to the Policy to reflect this.</b></p>	<p>‘Requiring development in this area to be <b>car free or as</b> close to car-free <b>as possible</b> in order to promote active and sustainable travel.’</p>
P1a – Great West Corridor West	<p>While we are supportive in principle of measures that improve active travel along the Great West Road corridor, we would need to work closely with the borough on any proposed improvements so that any impacts on TfL’s role as highway authority are considered from the outset.</p> <p>It may be helpful to include a reference to West London Orbital using similar wording to the other two sections of the GWC.</p>	<p><b>Comments and support noted. The need for a continued working relationship between TfL and LBH will be required to deliver transport infrastructure, including to improve active travel measures along the Great West Road, and this has been recognised as a key strategic matter that will need to be met in an ongoing duty to cooperate in Matter 1, above.</b></p> <p><b>It is not considered that the proposed modification to include reference to WLO addresses either a matter of soundness or legality and therefore</b></p>	<p>N/A</p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
		will not be suggested as a proposed modification in this instance.	
P1b – Great West Corridor Central	<p>While we are supportive in principle of measures that improve active travel along the Great West Road corridor, we would need to work closely with the borough on any proposed improvements so that any impacts on TfL’s role as highway authority are considered from the outset.</p> <p>Although we welcome support for the West London Orbital in part G the wording should be amended as follows: ‘Supporting the delivery of the West London Orbital line <del>which would serve connection to</del> Brentford Station in order to <del>increase the PTAL</del> improve the connectivity of the River Brent Quarter and the London Gateway area.</p>	<p><b>Comments and support noted. The need for a continued working relationship between TfL and LBH will be required to deliver transport infrastructure and this has been recognised as a key strategic matter that will need to be met in an ongoing duty to cooperate in Matter 1, above.</b></p> <p><b>Whereas the proposed modification to Part G does not address either the soundness or legality of the Plan, it does provide greater clarity and as such in this instance, is agreed with as a minor modification.</b></p>	Supporting the delivery of the West London Orbital line <b>which would serve connection to</b> Brentford Station in order to <del>increase the PTAL</del> <b>improve the connectivity</b> of the River Brent Quarter and the London Gateway area.
Chiswick	<p>We note the inclusion in part Di of ‘More frequent Piccadilly line stops at Turnham Green’. This would be dependent on completion of phase 2 of the Piccadilly line upgrade which includes new fleet and signalling. It should be noted that phase 2 is currently unfunded.</p> <p>Although we welcome support for West London Orbital in part Diii the wording should be amended as follows: ‘New West London Orbital rail link from Hounslow <del>station</del> to Hendon/West Hampstead via <del>the proposed west London transport</del></p>	<p><b>Whereas the proposed modification to Part Di does not address either the soundness or legality of the Plan, it does provide greater clarity and as such in this instance, is agreed with as a minor modification.</b></p>	New West London Orbital rail link from Hounslow <b>station</b> to Hendon/West Hampstead via <del>the proposed west London transport interchange at</del> Old Oak Common (links to <del>Crossrail</del> Elizabeth <del>L</del> ine and High Speed 2)

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<del>interchange at</del> Old Oak Common (links to <del>Crossrail</del> Elizabeth <del>L</del> line and High Speed 2)'		
Brentford	Although we welcome support for West London Orbital in part F the wording should be amended as follows: 'Promoting the provision of public transport improvements for Brentford, including links to the Elizabeth line at Southall via a new station along the Golden Mile, <del>and the new West London Orbital rail link</del> from Hounslow station to Hendon/West Hampstead via <del>the proposed West London Orbital transport interchange at</del> Old Oak Common (links to Elizabeth line and High Speed 2)'	<b>Whereas the proposed modification to Part F does not address either the soundness or legality of the Plan, it does provide greater clarity and as such in this instance, is agreed with as a minor modification</b>	'Promoting the provision of public transport improvements for Brentford, including links to the Elizabeth line at Southall via a new station along the Golden Mile, <b>and the new West London Orbital rail link</b> from Hounslow station to Hendon/West Hampstead via <del>the proposed West London Orbital transport interchange at</del> Old Oak Common (links to Elizabeth line and High Speed 2)'
Osterley and Spring Grove	Although we welcome support for West London Orbital in part F the wording should be amended as follows: 'Securing improved public transport provision through <del>a the</del> new <b>West London Orbital</b> rail link from Hounslow station to Hendon/West Hampstead via <del>the proposed west London transport interchange at</del> Old Oak Common (links to the Elizabeth <del>L</del> line and High Speed 2)	<b>Whereas the proposed modification to Part F does not address either the soundness or legality of the Plan, it does provide greater clarity and as such in this instance, is agreed with as a minor modification.</b>	'Securing improved public transport provision through <del>a the</del> new <b>West London Orbital</b> rail link from Hounslow station to Hendon/West Hampstead via <del>the proposed west London transport interchange at</del> Old Oak Common (links to the Elizabeth <del>L</del> line and High Speed 2)
Isleworth	It may be helpful to include a reference to West London Orbital using similar wording to Chiswick, Brentford and Osterley and Spring Grove.	<b>Comments noted. The proposed modification does not impact the legality or soundness of the plan, and in this instance, will not be taken forward as a proposed modification.</b>	N/A

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
Hounslow	It may be helpful to include a reference to West London Orbital using similar wording to Chiswick, Brentford and Osterley and Spring Grove.	<b>Comments noted. The proposed modification does not impact the legality or soundness of the plan, and in this instance, will not be taken forward as a proposed modification.</b>	N/A
P2 – West of the Borough	While we are supportive in principle of measures that improve active travel along the Great West Road corridor, we would need to work closely with the borough on any proposed improvements so that any impacts on TfL’s role as highway authority are considered from the outset.	<b>Comments and support noted. The need for a continued working relationship between TfL and LBH will be required to deliver transport infrastructure and this has been recognised as a key strategic matter that will need to be met in an ongoing duty to cooperate in Matter 1, above.</b>	N/A
Cranford and Heston	We note the commitment in part B to ‘Working with TfL to improve and increase the bus services from Cranford and Heston to Heathrow, key destinations in the rest of the borough and neighbouring boroughs such as Hillingdon and Ealing’. We would welcome opportunities to secure external funding towards bus service improvements to mitigate the impact of new developments and as part of improved surface access proposals at Heathrow.	<b>Comments and support noted. The need for a continued working relationship between TfL and LBH will be required to deliver transport infrastructure and this has been recognised as a key strategic matter that will need to be met in an ongoing duty to cooperate in Matter 1, above.</b>	N/A
P2a – Cranford and Heston Neighbourhoods	We note part G which should be amended as follows to recognise the fact that TfL is the highway authority for the named roads: ‘Delivering a high-quality public realm with active frontages and/or elevations that	<b>Comments noted. Whereas the proposed modification to Part G does not address either the soundness or legality of the Plan, it does provide greater clarity and as such in this</b>	<u>Part G</u> ‘Delivering a high-quality public realm with active frontages and/or elevations that relate positively to Cranford

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p>relate positively to Cranford Neighbourhood Centre and removing traffic barriers and <del>initiating working with TfL to investigate the potential for Healthy Streets improvements traffic calming measure</del> to roads including the Great West Road (A4/ A30), Bath Road (A4), and Parkway (A312).'</p>	<p><b>instance, is agreed with as a minor modification.</b></p>	<p>Neighbourhood Centre and removing traffic barriers and <del>initiating working with TfL to investigate the potential for Healthy Streets improvements traffic calming measure</del> to roads including the Great West Road (A4/ A30), Bath Road (A4), and Parkway (A312).'</p>
<p>CC2 – Urban Design and Architecture</p>	<p>We note part O which should be amended as follows: ‘Create, connect and improve places and the public realm to ensure that they are easy and pleasant to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe <del>(and are perceived to be safe)</del> during the day and night, with a particular focus on walking and cycling <del>pedestrians and cyclists.</del>’</p> <p>We note part U which should be amended as follows: ‘Ensure buildings and spaces are designed to stand the test of time and are easily adaptable and resilient to social, economic, technological and climate change, and can accommodate movement, cycle parking and car parking <del>(including alternative uses for car parking)</del> in a safe and useable way.’</p> <p>We note part BB which should be amended as follows: ‘Make well-designed, high-quality provision for bicycles, and the acceptable storage of recycling and refuse, having regard to policies EQ7 and EC2, the Character, Sustainability and Design Codes</p>	<p><b>It is not considered that the proposed modifications to Part O addresses either a matter of soundness or legality but in this instance do reiterate safety when travelling and as such agree with the proposed modification as a minor modification.</b></p> <p><b>It is considered that the proposed modifications to Part BB, whereas not soundness or legality matters, do help to give additional clarity to the Policy Clause, and therefore the proposed modifications are agreed with as minor modifications.</b></p>	<p><b>Part O</b></p> <p>Create, connect and improve places and the public realm to ensure that they are easy and pleasant to get to and through, foster active lifestyles, are easy to understand and navigate and feel safe <del>(and are perceived to be safe)</del> during the day and night, with a particular focus on walking and cycling <del>pedestrians and cyclists.</del></p> <p><u>Part BB</u></p> <p>‘Make well-designed, high-quality provision for bicycles, and the acceptable storage of recycling and refuse, having regard to policies EQ7 and EC2, the Character, Sustainability and Design Codes SPD, <del>relevant London Plan Policy, London Cycling Design Standards</del> and any other relevant guidance. Enclosures should be robust, well ventilated and</p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	SPD, <del>London Plan Policy T5, London Cycling Design Standards</del> and any other relevant guidance. Enclosures should be robust, well ventilated and attractively integrated with the site and screened for privacy and security.'		attractively integrated with the site and screened for privacy and security.'
C12 – Education and School Places	We note part J which should be amended as follows: 'Demonstrate that a new or expanded education facility is accessible by a choice of sustainable modes of travel in accordance with the type of facility being proposed, and that any car parking proposed would be provided in accordance with <del>the standards set out in Policy T6 of the London Plan.</del> '	<b>Comments Noted. It is not considered that the proposed modifications to Part J addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</b>	N/A
C13 – Health Facilities and Healthy Places	We note part F, the first sentence of which should be amended as follows: 'Contribute to the health and wellbeing of the local community by incorporating Active Design <del>and Healthy Streets</del> Principles to create healthier places.'	<b>Comments Noted. The Plan is supportive and promotes a Healthy Streets approach, with Healthy Streets embedded in numerous policies across the Plan. It is not considered that the proposed modifications to Part O addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</b>	N/A
C15 – Places of Worship	We note part B(v) which should be amended as follows: <del>'There will be sufficient off-street car parking to accommodate the anticipated users of the place of worship at both normal and peak times of use, while</del>	<b>It is considered that, whilst including wording to state that Places of Worship will need to comply with the standards set out in the London Plan, the wording 'sufficient off street</b>	<del>'There will be sufficient off-street car parking to accommodate the anticipated users of the place of worship at both normal and peak times of use, while</del> <b>Car-free development should be the starting</b>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p>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') in accordance with <del>the standards set out in</del> Policy T6 of the London Plan.'</p>	<p>parking' allows some flexibility for those determining Places of Worship applications. At peak times, Places of Worship can attract high levels of car users, and Places of Worship as destinations need to be able to accommodate a sufficient number of these cars to help alleviate the impact of on street parking. As such, the Modification is not agreed with in this instance.</p>	<p>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') in accordance with <del>the standards set out in</del> Policy T6 of the London Plan.'</p>
<p>EC1 – Strategic Transport Connections</p>	<p>We note and welcome Part C with regard to the WLO and seek clarity that Part P regarding development contributions to the strategic transport network would include contributions to the WLO scheme. We note part G 'Supporting improved access to the Piccadilly line, including the introduction of a permanent stop at Turnham Green and improved links between the line and the Great West Corridor.' The introduction of a permanent stop at Turnham Green is dependent on completion of phase 2 of the Piccadilly line upgrade which includes new fleet and signalling. It should be noted that this is currently unfunded.</p>	<p><b>Support and comments noted. As is stated in Matter 1, LBH look forward to working further with TfL on implementing the WLO.</b></p> <p><b>The Plan is supportive and promotes a Healthy Streets approach, with Healthy Streets embedded in numerous policies across the Plan. It is not considered that the proposed modifications to Part L addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</b></p>	<p><b>(Insert new Clause after C):</b></p> <p><u><b>D. Supporting the delivery of the proposed West London Orbital line through measures such as, where appropriate, safeguarding future additional land which is identified in collaboration with Transport for London, and communicating this with relevant stakeholders.</b></u></p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	We note part L ‘Promoting improvements to the highways network to best facilitate sustainable modes by <b>adopting the Healthy Streets Approach</b> , including targeted junction improvements, targeted travel demand management, signal optimisation and bridge works.’		
Table EC1.1	<p>Under the heading of Piccadilly line upgrade we note the entry ‘Planned upgrade includes the provision of new rolling stock and signalling equipment, which will cut journey times by 19% and increase capacity by 24%’. It should be clarified that although phase 1 is being delivered (new trains replacing existing fleet) providing higher capacity and greater comfort. Further phases (new signalling and extra trains to take advantage of the new signalling) are currently unfunded.</p> <p>Under the heading of Improving orbital and Overground rail connections the entry should be amended as follows: ‘Promotion of a new passenger service between Hounslow station and Hendon/West Hampstead via Old Oak Common, calling at Isleworth, Syon Lane, Brentford and a new station at Lionel Road South serving the Kew Bridge area. This proposed scheme would provide a connection to <b>Crossrail the Elizabeth line and HS2 and could be completed by the early 2030s, providing</b></p>	<p><b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that by modifying the text as suggested, the Policy will be more clear and better reflect the linkages between the Elizabeth Line and HS2. As such, the proposed modification is agreed with a minor modification. This is also the case for the proposed modification in the “Improving surface level access to Heathrow Airport” Section.</b></p> <p><b>In regards to the suggested omission, LBH support and promote the development of the WLO in Policy EC1 and also in Site Allocations 28 and 90 which state that the delivery of WLO stations is a requirement for the delivery of the Sites.</b></p>	<p><u>Improving Orbital and Overground Rail Connections</u></p> <p>‘This proposed scheme would provide a connection to <b>Crossrail the Elizabeth line and HS2 could be completed by the early 2030s, providing improved transport capacity and connectivity to the strategic Old Oak Common area and is connected to the wider business case for High Speed Two, though the connection could be implemented earlier.</b>’</p> <p><u>Improving Surface Level Access to Heathrow Airport</u></p> <p>‘Proposed southern public transport improvements to Heathrow Airport, with services originating from <b>London Waterloo Clapham Junction</b> using the South West Railway network and serving stations within the borough.</p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p><del>improved transport capacity and connectivity to the strategic Old Oak Common area and is connected to the wider business case for High Speed Two, though the connection could be implemented earlier.</del></p> <p>Under the heading of improving Piccadilly line access, we note the entry ‘Promotion of Turnham Green station as a permanent stop on the Piccadilly line rather than the early morning and late evening timetable presently in place.’ The introduction of a permanent stop at Turnham Green is dependent on completion of phase 2 of the Piccadilly line upgrade which includes new fleet and signalling. It should be noted that phase 2 is currently unfunded.</p> <p>Under the heading improving surface level access to Heathrow Airport we note the entry ‘Proposed southern public transport improvements to Heathrow Airport, with services originating from London Waterloo using the South West Railway network and serving stations within the borough.’ We welcome the flexibility for an optimum route to be determined. However, to maximise flexibility we would recommend that reference is made to Clapham Junction rather than specifying London Waterloo.</p> <p>Omission – There should be policy protection for the route alignment and any</p>	<p><b>The support and promotion of active travel routes along with sustainable modes of transport is also supported and embedded throughout the Plan and should any scheme impact existing bus stations, bus stands, bus garages, active travel routes and operational rail sites, TfL would be consulted at application stage.</b></p> <p><b>LBH include requirements for active travel in a number of relevant allocations including retention of bus stations and garages where relevant.</b></p>	

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	supporting land required for future projects such as West London Orbital as well as existing operational transport infrastructure including bus stations, bus stands and bus garages, active travel routes and operational rail sites, allowing for future expansion needs eg to accommodate electrification of the bus fleet.		
Figure EC1.2	The map of strategic transport connections and improvements needs to be updated to better illustrate the West London Orbital rail link (eg remove spur to Kew Bridge station, add and label station locations). It would also be helpful if strategic cycleway improvements could be shown more clearly. The map should show the aspirational walking and cycling networks including strategic and cross boundary links and existing routes that need upgrading to meet new quality criteria from TfL. This can be used as the basis and justification for securing section 106 or CIL contributions in line with the Sustainable Transport, Walking and Cycling LPG.	<b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that by modifying Figure EC1.2 as suggested, there will be greater clarity and a clearer link between Policy EC1 and Figure EC1.2. As such, Figure EC1 will be modified to better illustrate WLO rail link and strategic cycleway improvements.</b>	<b>Modifications to be shown on Figure EC1.</b>
EC2 – Developing a sustainable transport network	Although we welcome part A it should be amended as follows: ‘Promoting ‘car-free’ or ‘low car’ development <del>where appropriate</del> , as well as car clubs and car sharing schemes <del>where appropriate</del> in line with London Plan Policy T6 and T6.1 – <del>T6.5.</del> ’	<b>Comments noted. It is considered that the modifications proposed do not address either soundness or legality. However, it is considered that by modifying some parts of Policy EC2 as suggested, there will be greater clarity.</b>	<u>Part A.</u>  ‘Promoting ‘car-free’ or ‘low car’ development <del>where appropriate</del> , as well as car clubs and car sharing schemes <del>where appropriate</del> in line with London Plan Policy T6 and T6.1 – <del>T6.5.</del> ’

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p>Part C should be amended as follows: 'Preparing site specific development briefs where relevant, for strategic sites that include existing publicly accessible car parks, to ensure that <b>where justified public sufficient</b> car parking is retained to meet <b>essential</b> local needs.' This should be based on a vision-led approach rather than being based on 'predict and provide' and should normally result in an overall reduction in the quantum of car parking spaces.</p> <p>We welcome part D 'Using the standards established in the London Plan for car parking, cycle parking, motorcycle parking, coach parking, and electric vehicle charging (or as updated by alterations to the London Plan). The London Plan specifies the maximum number of car parking spaces that developments should provide, having regard to the type of development and public transport accessibility. The London Plan also specifies levels of cycle parking, however these are minimum standards and the council may seek a higher provision in certain circumstances.'</p> <p>We welcome part F 'Rebalancing the transport system towards walking and wheeling, cycling and public transport in order to achieve the London Plan strategic target of 71% of all journeys in Hounslow to</p>	<p><b>Minor modifications are therefore suggested.</b></p>	<p><u>Part C</u></p> <p>Preparing site specific development briefs where relevant, for strategic sites that include existing publicly accessible car parks, to ensure that <b>where justified public sufficient</b> car parking is retained to meet <b>essential</b> local needs.</p> <p><u>Part I</u></p> <p>'Developments should provide a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with the standards in the London Plan, <b>London Cycling Design Standards</b> and the WestTrans West London Cycle Parking Guidance and any subsequent guidance.'</p> <p><u>Part N</u></p> <p>'Prepare Travel Plans, Healthy Streets Checks and Assessments <del>and</del> Active Travel Zone assessments <b>and Parking Design and Management Plans</b> in accordance with latest guidance from Transport for London or any subsequently adopted guidance.'</p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p>be undertaken by sustainable modes of transport by 2041.'</p> <p>We welcome part G 'Applying a Healthy Streets approach to deliver liveable neighbourhoods, enhanced walking and wheeling and cycling routes and infrastructure that reduces traffic speed, promote safe streets and active travel in line with the London Plan.'</p> <p>The third sentence in part I should be amended as follows: 'Developments should provide a minimum number of cycle parking spaces and an appropriate maximum number of car parking spaces consistent with the standards in the London Plan, <b>London Cycling Design Standards</b> and the WestTrans West London Cycle Parking Guidance and any subsequent guidance.'</p> <p>Although we welcome part N this should be amended as follows: 'Prepare Travel Plans, Healthy Streets Checks and Assessments <del>and</del> Active Travel Zone assessments <b>and Parking Design and Management Plans</b> in accordance with latest guidance from Transport for London or any subsequently adopted guidance.'</p> <p>Omission – The policy should be accompanied by a map showing the aspirational walking and cycling networks including strategic and cross boundary links which should be used as the basis and</p>		<p><u>Omissions</u></p> <p>Aspirational Walking and cycling routes in figure EC1.2 will be added to.</p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p>justification for securing section 106 or CIL contributions in line with the Sustainable Transport, Walking and Cycling LPG. This could be achieved by adding in aspirational walking and cycling routes to figure EC1.2. Omission – There should be a positive policy towards the redevelopment of surplus car parking in line with London Plan Policies SD7 and H1.</p>		
<p>EC3 – Heathrow Airport</p>	<p>The policy is broadly aligned with Mayoral/TfL policy including the position on expansion and the need to improve sustainable surface access. It could be worded more clearly to set out the role of Heathrow Airport in initiating and funding sustainable surface access. In part C it should be ‘International Civil Aviation Organisation’ (ICAO) In part E it should be amended to refer to walking as well as cycle infrastructure as follows: ‘Promoting increased surface access provision to Heathrow Airport, by working with partners to improve public transport connections, walking and cycle infrastructure, and utilising the road network more efficiently.’ In part L it should be clarified that any additional trips arising from development should be via sustainable modes.</p>	<p><b>Support and comments noted. As is stated in Matter 1, LBH look forward to working further with TfL on implemented WLO.</b></p> <p><b>It is not considered that the proposed modifications to Part C or E addresses either a matter of soundness or legality however it is considered that by modifying some parts of Part C and E as suggested, there will be greater clarity. Minor modifications are therefore suggested.</b></p>	<p><b>Part C</b></p> <p><b>“<a href="#">International Civil Aviation Organisation (ICAO)</a>”</b></p> <p><b>Part E</b></p> <p>“Promoting increased surface access provision to Heathrow Airport, by working with partners to improve public transport connections, walking and cycle infrastructure, and utilising the road network more efficiently.”</p>
<p>IMP3 – Implementing</p>	<p>We note part N which should be amended as follows: ‘Mitigate the impacts of</p>	<p><b>Comments noted and modifications agreed with.</b></p>	<p>Mitigate the impacts of development on the <a href="#">transport highway</a> network,</p>

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and monitoring the Local Plan	development on the <del>highway</del> transport network, including through securing any necessary public transport or active travel infrastructure or service improvements to provide capacity or improved connectivity, or highways works in agreement with the appropriate highways authority.'		including through securing any necessary <u>public transport and active travel infrastructure, service improvements to provide capacity or improved accessibility and connectivity, and/or</u> highways works in agreement with the appropriate highways authority
Site allocations – movement and access	We welcome the requirement for most sites that 'Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport'. However, we have noted a few omissions to this below.	<b>Support noted.</b>	<b>N/A</b>
2 – Tesco, Osterley	We strongly support the requirement: 'The existing bus stops and stands are to be retained and enhanced for future bus service improvements and all necessary infrastructure for bus services is to be re-provided on Grant Way.'	<b>Support noted.</b>	<b>N/A</b>
5 – West Cross Campus	We strongly support the requirement 'Any proposal will be required to demonstrate that it will be adequately served by public transport and that it will contribute towards the delivery of the Golden Mile station and other public transport improvements until the station is secured.'	<b>Support noted.</b>	<b>N/A</b>
6 - BSS Brentford	We support: 'Development of the site must take into account the potential future delivery of the Golden Mile station adjacent to the west of the site'. Although this site has a lower capacity than site 5 (West Cross	<b>Support Noted.</b> <b>Policy EC1 and EC2 support/requires public transport improvements throughout the plan period.</b>	<b>N/A</b>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	Campus), similar wording should be adopted requiring (pro rata) contributions towards delivery of the station and other public transport improvements until the station is secured, particularly in view of the PTAL of the site.	<b>The proposed station is not located within the site boundary therefore any station specific requirements are not applicable to this site. However the Station is proposed within Site 5 which includes requirements for delivery of the new Golden Mile Station.</b>	
11 – Homebase, Syon Lane	We support: ‘Bus stop facilities are to be retained/relocated and enhanced’ and ‘Car parking is to be minimised with no more retail parking provided than is required for operational purposes and to ensure no adverse impact on the adjoining public highways.’ The Movement and Access section should be expanded to note that improved pedestrian and cycle routes across the site and over Syon Lane would provide better connection with the future WLO station just south of the site.	<b>Support Noted.</b>  <b>The Site Allocation already strongly promotes cycling and pedestrian connectivity both within the site and to adjoining areas. The Movement and Access section therefore will not be updated as it is not considered that the proposed modifications to Site 11 addresses either a matter of soundness or legality.</b>	N/A
27 - Kew Bridge Distribution Centre	In the Movement and Access section it should be stated that ‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport’ so that it is consistent with other site allocations.	<b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that the proposed additional text will help in giving further clarity and consistency. As such, wording will be suggested as a proposed minor modification.</b>	<b>‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport’</b> to be added to Movement and Access Statement.
28 – 27 Great West Road	We welcome the requirement that ‘Development must facilitate the delivery of the Lionel Road Station.’	<b>Support and comments noted.</b>	N/A

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	<p>We note in the Movement and Access section that development should be designed to accommodate vehicular access from both Lionel Road South and Great West Road. Care should be taken when designing access arrangements to ensure that they do not negatively impact on the new public square area, WLO station safeguarding area, access to the station or the proposed Clean Air Route around the site, and that impacts on Great West Road are minimised.</p>		
29 – EMC Tower	<p>The Movement and Access section should be expanded to note that improved pedestrian and cycle routes across the site and over the Great West Road would provide better connection with the future Lionel Road WLO station just south of the site.</p>	<p><b>Comments noted.</b></p> <p><b>The Site Allocation already strongly promotes cycling and pedestrian connectivity both within the site and to adjoining areas including crossing facilities for the GWR and better integration to surrounding areas to the south of the site. The Movement and Access section therefore will not be updated as it is not considered that the proposed modifications to Site 29 addresses either a matter of soundness or legality.</b></p>	N/A
33 – Esso Filling Station, Chiswick Roundabout	<p>We support the requirement that ‘Vehicular access to the site should be from Chiswick High Road (A205), with the number of</p>	<p><b>Support noted.</b></p>	N/A

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	access reduced and consideration given to how this can be best delivered given the highly sensitive position of the development site on the Chiswick Roundabout.'		
34 - Former NatWest Bank site, Chiswick	We support the requirement that: 'Access to the site is severely constrained due to presence of Red Routes around the site. Vehicular access must be appropriately located on Larch Drive, be designed to take into account the likely level of traffic generation and safety on the adjoining roads and must not have a significant impact on traffic flow on the surrounding road network'. Although new and improved pedestrian and cycle crossings on the A4 and A406 are supported in principle, they will need to consider the constraints imposed by the location and issues of safety which may preclude some options. Crossings should be designed to consider the access needs of other sites such as site 35.	<b>Support Noted.</b>	<b>N/A</b>
35 – B&Q, Chiswick	We support the requirement that: 'Access to the site is severely constrained due to presence of Red Routes around the site. Vehicular access must be appropriately located, be designed to take into account the likely level of traffic generation and safety on the adjoining roads and must not have a significant impact on traffic flow on the surrounding road network'. Although	<b>Support Noted.</b>	<b>N/A</b>

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	new and improved pedestrian and cycle crossings on the A4 and A406 are supported in principle they will need to consider the constraints imposed by the location and issues of safety which may preclude some options. Crossings should be designed to consider the access needs of other sites such as site 34.		
36 – 110 Power Road	We support the requirement that: ‘Vehicular access to the site should be improved and development should seek ways to increase access to the site for pedestrians and cyclists through removal of parking along the site frontage and replacement with high quality footway and access for pedestrians and cyclists.’	<b>Support noted.</b>	<b>N/A</b>
37 – Gunnersbury Station Car Park	We support the requirement that: ‘Provision of step-free level access to the platforms and improved station capacity should be provided or at minimum facilitated’.	<b>Support noted.</b>	<b>N/A</b>
43 – Heathrow International Trading Estate	For consistency, please add in under site requirements: ‘The Site is adjacent to the A312 a major distributor road and TfL Red Route. Development should not adversely impact the transport network.’ We welcome the following requirement if it is amended as shown in red: ‘Access to the site should be maintained from Green Lane, with any proposed vehicular access to the A312 to be agreed with TfL. Access should <b>not increase road danger and</b> be designed	<b>Comments noted. Both proposed changes are considered to be necessary to give the Site Allocation greater clarity and consistency.</b>	<u>Movement and Access</u>  Access to the site should be maintained from Green Lane, with any proposed vehicular access to the A312 to be agreed with TfL. <b>Access should not increase road danger and</b> should be designed to minimise impact on active travel modes. Access should also contribute towards meeting the modal shift targets in the London

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	to minimise impact on active travel modes. Access should also contribute towards meeting the modal shift targets in the London <del>Transportation</del> Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'		<del>Transportation</del> Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'
44 – Central Park Trading Estate	We welcome the following requirement if it is amended as shown in red: 'Development should provide new and improved routes within and around the site for pedestrians and cyclists including links to public transport nodes and services, etc. Roads within the site should be designed to provide safe and legible walking and cycling access. Development should contribute towards improved public transport and <del>active travel accessibility</del> to reduce the need for employees to travel by car and should seek to increase the PTAL of the site. Development should be designed in accordance with Healthy Streets principles.'	<b>Comments noted.</b> <b>The Site Allocation already sufficiently promotes active travel within the Movement and Access section of the site allocation. The Site Allocation therefore will not be updated as it is not considered that the proposed modifications to Site 44 addresses either a matter of soundness or legality.</b>	N/A
45 – Land at Green Lane	We welcome the following requirement if it is amended as shown in red: 'Development should provide new and improved routes within and around the site for pedestrians	<b>Comments noted.</b> <b>LBH feel that the allocation already sufficiently promotes active travel within the Movement and Access</b>	N/A

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	and cyclists including links to public transport nodes and services, etc. Roads within the site should be designed to provide safe and legible walking and cycling access. Development should contribute towards improved public transport <b>and active travel accessibility</b> to reduce the need for employees to travel by car and should seek to increase the PTAL of the site. Development should be designed in accordance with Healthy Streets principles.'	<b>section of the site allocation. The Site Allocation therefore will not be updated as it is not considered that the proposed modifications to Site 45 addresses either a matter of soundness or legality.</b>	
46 – Ron Smith Recycling, Green Lane	We welcome the following requirement if it is amended as shown in red: 'Development should provide new and improved routes within and around the site for pedestrians and cyclists including links to public transport nodes and services, etc. Roads within the site should be designed to provide safe and legible walking and cycling access. Development should contribute towards improved public transport <b>and active travel accessibility</b> to reduce the need for employees to travel by car and should seek to increase the PTAL of the site. Development should be designed in accordance with Healthy Streets principles.'	<b>Comments noted. LBH feel that the allocation already sufficiently promotes active travel within the Movement and Access section of the site allocation. The Site Allocation therefore will not be updated as it is not considered that the proposed modifications to Site 45 addresses either a matter of soundness or legality.</b>	N/A
48 – Vacant land at Dick Turpin Way	We note the following requirement but request that it is amended as shown in red because any new vehicle access from Great West Road will not be supported by TfL: 'Appropriately designed vehicular access to	<b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that some proposed altered additional text will help in</b>	<u>Movement and Access</u> Appropriately designed vehicular access to the site should be <b>provided from the A30 Great South West Road or Faggs</b>

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	<p>the site should be from <del>the A30 Great South West Road</del> or Faggs Road. Vehicular access should be designed to minimise impact on active travel modes. Pedestrian and cycle access should be provided to the Great South West Road, Dick Turpin Way and Faggs Road. It should also contribute towards meeting the modal shift targets in the London <del>Transportation</del> Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'</p>	<p><b>giving further clarity to the Site Allocation and allow flexibility in determining the positioning of safest access location on to the site. As such, wording will be suggested as a proposed minor modification.</b></p>	<p><del>Road</del>. Vehicular access should be designed to minimise impact on active travel modes. Pedestrian and cycle access should be provided to the Great South West Road, Dick Turpin Way and Faggs Road. It should also contribute towards meeting the modal shift targets in the London <del>Transportation</del> Plan by providing safe and pedestrian friendly walking and cycling accesses and routes to and from nearby centres and public transport hubs, and rebalancing design in favour of pedestrians and cyclists to the site through features such as pavement width, separated routes, landscaping, lighting and other measures.'</p>
57 – Land at Hatton Fields	<p>We note the requirements that: 'Development is to contribute towards meeting the modal shift targets in the Mayor's Transport Plan by providing high quality safe walking and cycling accesses and routes to and from business units and nearby centres and public transport hubs, and ensuring that design prioritises pedestrians and cyclists through features such as wide footways, segregated cycle routes, landscaping, lighting and other measures, and should support public access to the adjacent local open space through</p>	<p><b>Comments noted.</b></p>	<p><b>N/A</b></p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	provision of cycle and walking routes.’ and that ‘Contributions towards enhanced public transport services will be required, linking the site to key destinations and transport hubs.’		
64 – MOD Feltham	We support the following requirement if it is amended as shown in red: ‘The layout should support the creation of legible streets, which follow the Healthy Streets approach, minimise the impacts of traffic generation on the surrounding streets, do not provide thorough routes across the site <b>for vehicles (apart from buses)</b> , and enhance wayfinding and the overall character of the urban form and which will allow the future extension of bus routes into the site.’ Roads designed to be used by buses will need to conform to relevant TfL guidance and discussions should take place with TfL at an early stage in masterplanning to ensure that the design of the site provides appropriate through routes for buses and suitable standing space within the site so that public transport and active travel connectivity is optimised. An additional requirement should make it clear that contributions will be required towards bus capacity and infrastructure to cater for increased demand and any additional costs incurred in serving the site.	<b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that the proposed additional text will help in giving further clarity to the Site Allocation. As such, wording will be suggested as a proposed minor modification.</b>	<u>Movement and Access</u>  ‘The layout should support the creation of legible streets, which follow the Healthy Streets approach, minimise the impacts of traffic generation on the surrounding streets, do not provide through routes across the site <b>for vehicles (apart from buses)</b> , and enhance wayfinding and the overall character of the urban form and which will allow the future extension of bus routes into the site.’

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67 – UPS House	We note the following requirement that: 'Appropriately designed vehicular access to the site should be from Forest Road, with an additional arm from the Browells Lane/Forest Road roundabout investigated, together with the potential for providing bus access through the site to the MOD Site.' Roads designed to be used by buses will need to conform to relevant TfL guidance and discussions should take place with TfL at an early stage in masterplanning to ensure that bus access through the site is appropriate and feasible and if so that the design of the site provides appropriate through routes for buses and suitable standing space within the site so that public transport and active travel connectivity is optimised.	<b>Comments noted.</b>	N/A
74 – Hounslow West Station	The site requirements should be amended (as shown in red) to delete the reference to short-term car parking provision because the site has a PTAL of up to 5 and a requirement for car parking to serve a local centre in this location would not be consistent with the London Plan. ' <del>Well-considered redevelopment of the site to create a mixed-use retail, leisure and residential development, and E((d-f)/F1/F2(c-d)) and appropriate level of short term car parking provision to serve the station and local centre.'</del>	<b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that the proposed additional text will help in giving further clarity to the Site Allocation. As such, wording will be suggested as a proposed minor modification.</b>	<u><b>Well-considered redevelopment of the site to create a mixed-use retail, leisure and residential development, and E((d-f)/F1/F2(c-d)) and appropriate level of short term car parking provision to serve the station and local centre.'</b></u>

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	<p>The site includes off-highway bus stops, bus standing and turnaround facility. These bus facilities will need to be retained or re-provided as part of any redevelopment. We note that 'To ensure the safe operation of the railway, an appropriate level of TfL / LUL staff car parking spaces may be provided.' We recognise that there may be justification for operational parking at this site. As set out in the definition of operational parking in the London Plan glossary, this does not include parking for personal travel such as commuting. As the site is owned by London Underground and Places for London are developing proposals for a redevelopment, they will provide further comments on this site allocation separately.</p>		
90 – Inwood Business Park	<p>We welcome the identification of land at Inwood Business Park for the WLO as this would help deliver a bay platform to turn back trains should this be required. It could also help facilitate the delivery of step free access at the station, either as part of WLO or as a separate scheme. Our current preferred approach to turning trains back is a centre turnback siding to the west of the station and road bridge, as this can be delivered within the railway boundary and avoids the need for terminating trains to cross one of the tracks. Although the</p>	<b>Comments noted.</b>	<b>N/A</b>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p>wording differs slightly from that we previously suggested, we support the following: ‘Development proposals will be required to retain land to the north of Hounslow station to facilitate the West London Orbital Rail line which is proposed to terminate at Hounslow.’</p>		
<p>91 – Hounslow Bus Garage</p>	<p>The site allocation should make it clear that it includes the adjacent bus station as well as the bus garage and that both uses will be re-provided as part of the redevelopment proposals in line with London Plan Policy T3 and the Sustainable Transport, Walking and Cycling LPG.</p> <p>We note that: ‘the operation of the bus garage is not compromised by the position of and layout of the residential dwellings and amenity spaces and vice versa.’ We support the requirement that bus garage (and bus station) operations are not compromised. However, the agent of change principle should be applied to ensure that as part of any redevelopment, the residential dwellings are designed and laid out, and incorporate appropriate mitigation, to take account of the 24/7 requirements of an operational bus garage and the adjacent bus station. We recommend that the wording is altered to read: ‘<b>the operation of the bus garage and bus station are not compromised by the</b></p>	<p><b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that the proposed additional text will help in clarifying that both the bus station and bus garage are included and that both uses will be re-provided as part of the redevelopment. As such, some text is proposed as a minor modification.</b></p>	<p>The following text has been added to the site requirements:</p> <p><u>‘The operation of the bus garage and bus station should not be compromised by the position of, design and layout of the residential dwellings and amenity spaces. The agent of change principle will need to be applied to ensure that the rest of the development provides appropriate mitigation to address any impacts arising from the 24/7 operational needs of the bus garage and bus station.’</u></p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	<p>position of, design and layout of the residential dwellings and amenity spaces and that the agent of change principle is applied to ensure that the rest of the development provides appropriate mitigation to address any impacts arising from the 24/7 operational needs of the bus garage and bus station.'</p> <p>Due to TfL land and property interests in the site, Places for London will provide further comments on this site allocation separately.</p>		
92 - Upstage	<p>We note that the site is currently used by Metroline for bus servicing and is proposed for a mixed residential and industrial development without any requirement to replace the bus servicing facility. The site which is known as 'Lampton' is currently leased by one of our contracted bus operators, who operate up to 40 vehicles, alongside employing around 100 staff on site. Sites such as this, are vital to enable the bus network to operate efficiently and cost effectively. The Movement and Access section should make it clear that if this site were to come forward for development, TfL and the bus operator should be involved in early discussions to identify another site of this size within the immediate vicinity to help provide the same level of service in line with Policy T3 of the London Plan and the</p>	<p><b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that some proposed additional text will help in giving additional clarity.</b></p>	<p><b>The site requirements will be modified, with the addition of the following text.</b></p> <p><u><b>“For any development proposals that come forward, TfL and the bus operator should be involved in early discussions to identify alternative provision for the bus servicing facility to help provide the same level of service in line with Policy T3 of the London Plan and the Sustainable Transport, Walking and Cycling LPG”</b></u></p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	Sustainable Transport, Walking and Cycling LPG.		
98 – Osterley Station Car Park	<p>We note that the Movement and Access section includes: ‘Disabled car parking, parking for the station should be retained.’ This wording is unclear and it should be made clear that only disabled persons’ parking for users of the station should be retained. We recommend the wording is amended as shown: ‘<b>Disabled persons’ car parking, parking for station users should be retained.</b>’</p> <p>For consistency, please add in under site description: ‘The Site is adjacent to the A4 a major distributor road and TfL Red Route. Development should not adversely impact the transport network.’</p> <p>Due to TfL land and property interests in the site, Places for London will provide further comments on this site allocation separately.</p>	<p><b>Minor modification to improve clarity in Movement and Access Statement agreed with to give additional clarity.</b></p> <p><b>It is not considered that the proposed modification to the Site Description Section addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</b></p>	‘Disabled <b>persons</b> ’ car parking <b>and</b> parking for <del>the</del> station users should be retained’
100 – Osterley Park Hotel	<p>For consistency, please add in under site description: ‘The Site is adjacent to the A4 a major distributor road and TfL Red Route. Development should not adversely impact the transport network.’</p> <p>We note that: ‘Appropriate vehicular access is to be provided from Wood Lane and/or the A4 Great West Road.’ As part of the residential redevelopment, the opportunity should be taken to close the existing vehicle access from Great West Road which would</p>	<p><b>It is not considered that the proposed modifications to the Site Description addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</b></p> <p><b>It is considered that additional wording regarding access is useful in clarifying access to the site, and text has been suggested as a proposed modification.</b></p>	Movement and Access Section is to be updated to include ‘ <b>Appropriately designed vehicular access to the site is to be provided.</b> ’

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	not be appropriate for access to a residential site in this location and is likely to be opposed by TfL. We recommend the wording: 'Appropriate vehicular access is to be provided from Wood Lane and the existing access from A4 Great West Road closed.'		
102 – Victory Business Centre	For consistency, please add in under Movement and Access: 'Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport.'	<b>Comments noted. Whereas the proposed modification does not address either soundness or legality, it is considered that some proposed additional text will help in giving additional clarity.</b>	<b>Movement and Access section modified with the addition of the following text:</b>  ' <u>Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport.</u> '
116 – 1 Burlington Lane	For consistency, please add in under site description: 'The Site is adjacent to the junction of the A316 and A4 which are major distributor roads and TfL Red Routes. Development should not adversely impact the transport network.'	<b>Comment noted. It is not considered that the proposed modifications to the Site Description addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</b>	N/A
118 – Former GSK site	We note the following requirements in the Movement and Access section: 'Vehicle access needs to be redesigned to reduce impact on Boston Manor Road and the A4 Great West Road with priority given to pedestrians and cyclists but minimising the impact on traffic flow' and 'Development should facilitate the creation of a green and pedestrian/cycle-friendly boulevard on the	<b>Comments noted.</b>	N/A

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	Great West Road by improving the existing infrastructure including crossings over the Great West Road to better integrate the site into the town centre.' While we are supportive in principle of measures that improve active travel along the Great West Road corridor, we would need to work closely with the borough on any proposed improvements so that any impacts on TfL's role as highway authority are considered from the outset.		
123 – 1-83 High Street Hounslow	Given the site PTAL of 6a/6b and the location in Hounslow town centre the London Plan would require retail and residential development to be car free. There should be amendments to the movement and access section to reflect this as follows: 'Development should <b>seek to limit car parking on the site to the minimum necessary and any re-provided car parking should be clearly justified as public parking to serve the town centre as a whole. maintain an appropriate level of car parking to serve the town centre based on This should take account of</b> current levels of use of all town centre car parks and <b>targets for mode share expected levels of demand.</b> Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport. <b>Residential and retail</b>	<p><b>Minor modification partially agreed with as it provides greater clarity to the movement and access section of the site allocation. The commercial element of the site allocation will include uses that will require car parking provision.</b></p> <p><b>LBH note a small typo in the proposed modification text in the schedule document (S11) submitted alongside the draft Local Plan (i.e. should be 're-provided', not 'pre-provided') and will raise this at the appropriate time with the Inspectors.</b></p>	<p>"Development <b>should seek to limit car parking on the site to the minimum necessary and any re-provided parking should be clearly justified as public parking to serve the town centre as a whole. maintain an appropriate level of car parking to serve the town centre based on current levels of use of all town centre car parks and expected levels of demand.</b></p> <p>Residential development is to be car free except for provision of disabled <b>persons</b> parking and <b>necessary operational parking .</b></p>

Section / Policy / Paragraph	TfL Reg19 rep comments	LBH comments	Agreed modification if applicable
	development is to be car free except for provision of disabled <b>persons</b> parking.		

## APPENDIX B: Table of Outstanding Matters

Description of matter/s which remains outstanding	TfL comments	LBH comments	Agreed next steps
TC2 – Ensuring the future vitality of town centres	<p>We note part G which should be amended as follows: Ensuring that <b>high quality cycle parking and a limited amount of public car parking adequate car and cycle parking space</b> is maintained in each town centre, and that new development (<b>including sites that are redeveloped</b>) uses the standards established in the London Plan.'</p> <p><b>TfL second response</b> This proposed modification isn't a matter of conformity however for clarity, the wording should be changed to ensure the proposed plan is avoiding encouraging car parking provision wherever possible. This is especially considering the high level of connectivity in town centres, which would most likely require car-free development in line with the London Plan. This would bring the proposed plan in line with policies T6 A, T6.2 and T6.3 which strongly encourage developments in town centres to be</p>	<p>Comments noted. The Policy includes wording for 'adequate car and cycle parking spaces', to ensure that the vitality and viability of town centres in the Borough is safeguarded.</p> <p>It is not considered that the proposed modification addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</p> <p>As per LBH previous comments, the modifications do not address soundness, and as noted by TfL this is not a matter of conformity. However, minor modifications are suggested to provide greater clarity.</p>	<p>The parties agree to present this matter to the Inspector for their consideration as part of the examination process.</p>

	<p>car free. The councils response refers to vitality and viability of town centres. TfL argues here, and across other Local Plans across the city, that vitality and viability is not improved by car parking which takes away opportunities for improved public realm, other land use opportunities or improved sustainable mode space allocation.</p> <p>We also maintain the line '(including sites that are redeveloped)' should be included in the text. This would ensure that the policy is in line with T6L which reiterates that where redevelopment happens, car parking should come in line with current London Plan policy. This should be reiterated in the emerging plan to ensure redevelopment is in line with existing London Plan policy.</p>		
<p>EC2 – Developing a sustainable transport network</p>	<p>Part M should be amended as follows: 'Demonstrate that <b>sufficient where justified</b> public car parking remains or is re-provided in the area to serve <b>essential</b> local needs where there will be a reduction in off-street car parking and/or where parking cannot be accommodated on-site. This could include consideration of <b>parking controls</b>, available on-street car parking or involve the provision of an appropriate temporary facility. This should ensure that the development ultimately provides for <b>existing-essential</b> local needs.' <del>together with the resulting increase in demand arising from the development</del> This should be based on a vision-led approach rather than being based on 'predict and provide' and should normally result in an overall reduction in the quantum of car parking spaces.</p> <p><b>TfL Second response</b> Although not a matter of conformity, in Part M, wording such as providing 'sufficient' parking to meet the</p>	<p>As per LBH previous comments, the modifications to Part M do not address soundness or legal compliance, and we do not agree to present these as suggested modifications at this stage. However, this will be presented as a matter for further discussion through the examination process.</p>	<p>The parties agree to present this matter to the Inspector for their consideration as part of the examination process.</p>

	<p>‘resulting increase in demand’ leaves potential misinterpretation to suggest car parking shouldn’t be designated for only essential needs. Whilst we recognise there is potentially increasing demand for parking where there is growth, meeting this demand is not feasible considering the demand for space for housing and the pre-existing congestion on roads across London. We recognise this as the same issue in Part C, although we recognise that the wording of these two policies are different, with Part M referring more to public car parking provision.</p> <p>The change of wording would also bring the policy closer in line with London Plan policies in T6, particularly A, which sets out the basic concept that ‘car parking should be restricted’. Referring to parking controls also brings the policy closer to London Plan policy T6 C which states that boroughs should look to ‘implement these [parking] controls wherever necessary’.</p>		
Policy CC2, clause U	<p>TfL welcome amending Policy CC2 Part U, however we note an issue with the proposed modification in relation to the addition ‘(including car parking)’. TfL note it is potentially saying that car parks should be ‘adaptable’ however with the other wording of ‘stand the test of time’, this makes it sound like permanent car parking is being encouraged. If the wording in brackets above is removed then we are happy with Policy CC2.</p>	<p>LBH presented the following suggested modification in the Schedule of Suggested Modifications (S11):</p> <p><b>Part U</b>  ‘Ensure buildings and spaces <b>(including car parks)</b> are designed to stand the test of time and are easily adaptable and resilient to social, economic, technological and climate change, and can accommodate movement, cycle parking and car parking <b>(including</b></p>	<p>The parties agree to present this matter to the Inspector for their consideration as part of the examination process.</p>

		<p>alternative uses for car parking) in a safe and useable way.'</p> <p>We will now need to raise this matter with the Inspectors through the examination process.</p>	
<p>Site 80 – 34 Staines Road</p>	<p>The final sentence in the Movement should be deleted as follows: 'Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport- <del>Commercial car parking must be available for visitors to the town centre.</del>' The requirement for commercial car parking should be deleted because the London Plan requires retail development to be car free in areas of PTAL 6a and metropolitan town centres. London Plan Policy T6L also makes it clear that '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.' The site requirements should also be amended as follows: 'Redevelopment of the site to create a mixed-use retail and residential development, with a single large ground floor retail unit (A1) <del>and appropriate level of car parking provision.</del>'</p> <p>As a matter of conformity, we maintain that the originally proposed modification set out in our Regulation 19 response comments are necessary to bring the Plan in line with London Plan standards for commercial car parking which requires retail development to be car free in areas of PTAL 6a, the PTAL level of this site. Published evidence demonstrating need is required as part of the</p>	<p>Comment Noted. An appropriate level of car parking must be kept and made available to ensure the viability and vitality of the town centre isn't compromised. The viability of the commercial element is likely to require parking availability for costumers. As such, it is not considered that the proposed modifications to the Site Allocation addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification.</p>	<p>The parties agree to present this matter to the Inspector for their consideration as part of the examination process.</p>

	development of a local plan to justify deviation from the London Plan standards and policy such as this.		
103 – West Middlesex Hospital	<p>The first sentence of the Movement and Access section should be amended as follows: ‘The site is a functioning hospital with large amounts of parking and access routes on site, <del>these the hospital</del> uses must be supported and enhanced <b>with consideration given to the rationalisation of car parking</b>. Appropriately designed vehicular access to the site should be from Twickenham Road including appropriate emergency vehicular access.</p> <p>We support the following: ‘Access for pedestrians and cyclists is to be enhanced, with bus stops, stands and turning facilities provided to allow current bus services to continue and appropriate retention of land to allow for future capacity improvements to be accommodated.’</p> <p><b>TfL Second response</b> We appreciate the ongoing change of wording around uses. We would, however, still encourage including wording around rationalisation as suggested in the proposed modification. Car parking should be rationalised in line with London Plan Policy T6.3 B and C. Whilst this refers to retail parking, it is important to keep all sites consistent with the London Plan concept which requires ‘car parking [to] be kept to a minimum’ (10.6.19). This means when car parking is supported in all types of development, any car parking minimum set should be rationalised within the context of that development. We therefore maintain that wording should be changed to</p>	<p>Comments and Support noted.</p> <p>Whereas the proposed modification does not address either soundness or legality, it is considered that some proposed additional text will help in giving additional clarity. As such, suggested modifications have been agreed and presented in the submission document Schedule of Suggested Modifications (S11 – see modification HLP_SA103_0 2) to the ‘Movement and Access’ section. Any further suggested modifications around ‘rationalisation’ will need to be discussed through the examination process.</p>	<p>The parties agree to present this matter to the Inspector for their consideration as part of the examination process.</p>

	include a sentence around rationalisation such as in our initial response.		
Site 107 – Sainsburys Chiswick	<p>We note the second sentence of the movement and access section which states ‘Redevelopment should provide an appropriate level of car parking to support the retail use while seeking to facilitate increased cycling and pedestrian access and movement across the site in a way which creates a legible street pattern and which provides high quality pedestrian and cycle routes.’ Given the site PTAL of 4/5 and the location in Chiswick town centre the London Plan would require retail (re)development to be car free. The requirement that ‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport.’ is supported but it should be clarified that ‘an appropriate level of car parking’ is referring to disabled persons’ car parking and that there should be no general car parking for store staff or customers.</p> <p><b>TfL Second response</b> We maintain the proposed modification from our regulation 19 response which clarifies the reference to car parking. In conformance with London Plan Policy T6.2, this site is sufficiently connected to require retail (re)development to be car free. The site is PTAL 4 and within Chiswick town centre, it also has close proximity to Chiswick Park station. To ensure clarity and soundness of the emerging local plan, we strongly reiterate that wording should make clear this development would be expected to be car free. Where car parking is mentioned wording should be changed to ‘provide an appropriate level of disabled person’s parking’.</p>	<p>Comments noted.</p> <p>The site in question encompasses retail use with a Supermarket being retained as part of the allocation. An appropriate level of car parking for a supermarket in this location is considered suitable to ensure the supermarket remains viable. The proposed allocation includes wording for an ‘appropriate level of car parking provision to support the retail use’, which provides sufficient flexibility for some limited parking to support the retail use, should there be sufficient evidence to justify this at application stage. It is therefore not considered that the proposed modifications to the Site Description addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance.</p>	<p>The parties agree to present this matter to the Inspector for their consideration as part of the examination process.</p>

<p>Site 117 – Treaty Centre</p>	<p>Given the site PTAL of 6a/6b and the location in Hounslow town centre the London Plan would require retail and residential development to be car free. There should be amendments to the Movement and Access section to reflect this as follows:</p> <p><del>‘Development should seek to limit car parking on the site to the minimum necessary and any re-provided car parking should be clearly justified as public parking to serve the town centre as a whole. re-provide the car park for the site in an alternative location, maintaining an appropriate level of car parking to serve the town centre based on expected levels of demand. The level of town centre car parking must be agreed with the Council and ensure that the vitality and viability of the town centre is not adversely impacted. This should take account of current levels of use of all town centre car parks and targets for mode share...’</del></p> <p>‘Development is to conform to the maximum parking standards in the London Plan while maximising access by walking, cycling and public transport. Residential and retail development is to be car free except for provision of disabled persons parking.’</p>	<p>Comment noted.</p> <p>It is not considered that the proposed modifications to the Movement and Access section addresses either a matter of soundness or legality and therefore will not be suggested as a proposed modification in this instance. The site will have some commercial/retail space and it is considered that some parking is necessary for this use to protect the vitality and viability of the Town Centre.</p>	<p>The parties agree to present this matter to the Inspector for their consideration as part of the examination process.</p>
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