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Dear Steve

Central Ealing Neighbourhood Plan Submission to Ealing Council, TfL comments

Thank you for consulting Transport for London (TfL) on the draft Central Ealing Neighbourhood Plan. Please note that these comments represent an officer level view from TfL Borough Planning relating to operational, spatial planning and strategic transport policy matters and are made entirely on a "without prejudice" basis. Comments relating to TfL's commercial property interests as landowner and potential developer are being provided separately.

The response should not be taken to represent an indication of any subsequent Mayoral decision in relation to this Plan nor upon planning applications arising from the Plan. These comments also do not necessarily represent the views of the Greater London Authority. .

There are a number of operational assets included in the plan area including Ealing Broadway Underground station as well as TfL bus stops and stands, including those on Haven Green. In addition, the A4020 Uxbridge Road, which is part of the Strategic Road Network (SRN), passes through this area. TfL has an oversight role over the SRN.

TfL previously responded to an earlier draft of the Neighbourhood Plan in April 2016 and raised serious concerns about policies and recommended actions relating to Haven Green. These do not appear to have been taken into account in the revised draft and so TfL must raise formal objections to policy HBE4 (ii) and associated text which seeks designation of Haven Green as Local Green Space as well as Recommended Action 6 (b) which seeks removal of bus and cycle infrastructure from Haven Green. Formal objection is also raised to Recommended Action 7 which seeks to create a replacement transport interchange facility on the BBC car park – a proposal which has previously been rejected as impractical in the Ealing Broadway Interchange study. Further comments are provided below.

Policy HBE4 (ii) – Public Open Space

The proposed designation of Haven Green as Local Green Space is inappropriate and could make future management of this area more difficult. The road across Haven Green which includes bus stops and stands has never formed part of the common land. The site is already covered by a Public Open Space designation which is more suitable to its function. (please see also objection to Recommended Action 6 (b))

Recommendation Action 6 – (B) - P49

TfL cannot support the proposal to remove and re-site bus stops and stands from their existing location at Haven Green, this is contrary to London Plan policy 6.2 'Providing public transport capacity'; which requires the safeguarding of land for transport use. TfL considers that the bus stops and the interchange that they allow with Ealing Broadway station are an essential part of the transport infrastructure in Central Ealing and there is no plan to relocate them. The Ealing Broadway interchange study previously undertaken examined a

very extensive range of options and selected a scheme which strikes the best balance between infrastructure needs and environmental quality. This scheme is costed, funded and in the process of implementation.

TfL does not support the removal of all cycle parking spaces from the Haven Green area. Provision of good quality cycle parking facilities at key destinations is vital to support cycling journeys to such destinations and make cycling a more attractive proposition. TfL considers that the existing cycle parking facilities support those cycling to Ealing Station for utility purposes but also those are cycling to the area for leisure purposes. Furthermore, the Mayor is committed to increase cycle parking and has a desire for a desire for a mini-Holland in all boroughs; therefore the proposed removal of the cycling facilities from the current location as this would be contrary to London Plan policy 6.9 'Cycling'. TfL also likes to point out that there is a need for bus provision in outer London to reduce car use and dependency, and there is a positive link between cycling and public transport use in relations to air quality as well as public health, reducing health inequalities and congestion. Therefore, TfL considers the proposal would do the opposite, which would result in an overall adverse impact to the local environment, in terms of congestion and air quality.

Recommendation Action 7 – Ealing Broadway Interchange – P53

As stated above, TfL cannot support the removal and relocation of existing bus stops and bus stands away from Haven Green and has no intention to do so. The proposal to relocate bus stops and bus stands onto the BBC car park appears to be unworkable for a variety of reasons and therefore would be undeliverable. The recommended action should be removed from the Plan unless it can be demonstrated to TfL and Ealing Council that the proposals can be delivered and would provide benefits for transport interchange with Ealing Broadway and bus operations.

TfL also cannot support moving cycle parking unless the new location is more convenient, attractive, functional, well overlooked and secure and provides better interchange with Ealing Broadway. TfL supports the provision of additional cycle parking at other locations across the area. However, cycle parking at Haven Green should remain in order to cater for those cycling to the site for leisure or utility purposes.

Please also see comments on site allocation CENP2 below

Recommended Action 8 – Traffic Signaling – P53

TfL requests that any review of the traffic flow and signal arrangement must ensure that no adverse impact would result to A4020 Broadway/ New Broadway as it forms part of the Strategic Road Network (SRN).

Recommended Action 9 – Electric Vehicle Charging Points – P53

TfL supports the principle to provide electric vehicle charging points (EVCP) in Central Ealing, it considers that the level of provision should exceed the suggested level.

Policy T1 – Sustainable Transport for London – P51

Ealing Broadway and Newhaven Green is one of the 187 identified Air Quality Focus Areas. TfL supports this policy in principle which ensures that the impact to road traffic would be kept to a minimum, and promotes use of walking, cycling and public transport as alternative sustainable modes of transport, which will help to improve air quality by reducing vehicle traffic and emission. As such, adequate mitigation in particular toward promoting modal shift to sustainable transport modes should be actively sought and secured by appropriate condition/ legal agreement if needed.

Policy T2 – Parking – P54

TfL considers that car parking should be restrained in light of the area's very good public transport access, this will also help to minimise car trips to the area. Parking provision, with the exception of blue badge parking should be provided based at the lower end of the scale

in line with current London Plan and Ealing's car parking standards, which accords to London Plan policy 6.13 Parking.

It will be important to ensure that cycle parking should also be attractive, convenient, accessible and secure.

Recommended Action 10 - i

TfL opposes provision of additional on-street 'Stop and shop' parking bays, given that there is existing on-street and off-street public parking already available in the vicinity. The provision of stop and shop on streets would attract further car trips to the area, contribute to congestion and is therefore not supported.

Policy T3 – Servicing – P56

TfL supports the principle to require developments to provide rear or basement servicing facilities. Inset loading bay should only be provided where it is considered safe to do so with limited operation hours supported by enforcement.

Recommended Action 11 –P56

TfL supports street improvement to make the street environment more attractive for pedestrians, which in turns help local businesses.

Objective 5.3.19- 5.3.20, Policy T4 – Cycle Paths – P56

TfL considers it is appropriate that provision of dedicated and segregated cycle paths into and through Central Ealing should be considered; and that infrastructure provided should be in accordance with guidance provided in the London Design Cycling Standards (LCDS). It would also be helpful to provide further detail on what improvements to the local environment may be required to support an increase in cycling. TfL recommends that a further reference is made to Cycling Level of Service (CLOs) Assessments (Chapter 2 in the LCDS). This assessment will help to provide a clear picture of the most important safety issues for cycling to/from sites and will inform potential improvements that could be made to provide safer access for cyclists.

Policy T5 – Public Transport – P58

TfL is pleased that proposals should be supported which will enhance public transport infrastructure in the vicinity of Ealing Broadway Station. Developments should be expected to provide a contribution toward improvements where appropriate, and this to be secured via s106 agreement or CIL.

Policy PR1 – Improving Public Realm – P59

TfL supports the principle of securing improvements from developments towards the public realm and pedestrian routes.

Policy PR3 – Improving Permeability – P59

TfL supports the principle of providing traffic free routes where appropriate, minimising clutter and maximising the opportunities for improving walking cycling permeability of the town centre and connectivity through the plan area.

Section 8 – Maps

It would be helpful if this section also includes a map showing strategic corridors for cycling in the area of the plan (existing key routes - categorised by type of provision - and potential new routes). Additionally, identification of cycling parking facilities across the area would be also useful.

Site allocation CENP2 – Land off Haven Green/ Springbridge Road

TfL considers that the proposal to use this area to accommodate bus stops and stands and cycle parking relocated from Haven Green would not be feasible, as the site would not provide sufficient space for buses to turn around and the existing structure cannot accommodate the expected weight and loading. TfL also wants to emphasise that the

current proposals which emerged from the Ealing Broadway interchange study and are being implemented are the preferred option. As such, TfL objects to this site allocation which should be deleted.

I hope this is of helpful and please do not hesitate to contact me if I can be of any further assistance.

Yours faithfully

PakLim Wong
Planner
Borough Planning, Transport for London

Copied:

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