



Transport for London Commercial Development – Written Statement on Main Matter

I: Duty to Cooperate and other legal requirements

Recently TfL has set up a dedicated commercial property company, Transport Trading Limited Properties Limited (TTLP), to deliver housing in high demand areas and provide an increased revenue stream, and also to manage its commercial estate and undertake other development projects. Although TTLP will be driving development forward for TfL in Waltham Forest and elsewhere in London, we submit our responses in the name of TfL CD in order to be consistent with our previous representations, our SoCG with the Council and to avoid confusion. TfL CD can be considered interchangeable with TTLP for the purposes of our responses to the Inspectors' matters.

1.4 Is it reasonable/realistic to assume that the following measures will contribute to a reduction in AADT as set out in the AQS2:

- Redevelopment of sites generating significant traffic movements
- Car free development (Policy 68)
- Active and sustainable Travel (Policies 62 & 63)

Would a net reduction in vehicle movements be achieved if the sites anticipated for the development of uses that would generate less vehicular traffic (compared with existing uses), do not come forward as anticipated?

TTLP have previously promoted through various Local Plan consultations the following sites:

- Highams Park Station Car Park
- Leytonstone Station
- 67 – 73 Guildford Road
- Land at Whipps Cross
- Chingford Station Car Park

Development at Highams Park Station Car Park, Leytonstone Station and Chingford Station Car park in particular would contribute to AADT by providing car free development, supporting active and sustainable travel, and reducing significant traffic movements. The allocation of these sites could help to mitigate any potential losses to reduction in AADT should other anticipated sites not come forward as expected.

However, in the Consultation Reports there do not appear to be any mention of, or response to, our promotion of these sites. The above sites do not appear to have been assessed in the Sustainability Appraisal and only Highams Park Station Car Park has been included in the Brownfield Land Register.

In addition, Chingford Station Car Park and bus terminal was included as a site allocation in the 2020 draft Local Plan site allocation consultation, however, this was subsequently removed. The Habitats Regulations Assessment Report (November 2021) noted that this site has been removed because the developable area was deemed to be too small for the site to be allocated. The policy team also clarified that on closer review of the site boundary there is very little of the site that does not fall within TfL's operational usage. It was clarified through our Regulation 19 response that development on the site would likely involve retention of operational uses on the ground floor with residential above. This type of co-location is something that we are doing on a number of operational sites across London using high quality and sensitive design. As such, the site allocation for this site should be reinstated.

Yours sincerely,

Name: David Dawkins
Title: Apprentice Property Surveyor
TTL Properties Limited, Transport for London

CC. TTLP Property Consultation
Name, Title, Organisation