



RIDGE

Highways Proof of Evidence James Parker

Land North of Little Green Lane, Croxley Green
LPA Ref: 24/2073/OUT
Pins Ref: 6004972

July 2026

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1 Introduction

1.1 Qualifications and Experience

- 1.1.1 My name is James Parker. I am the former founding director of Hub Transport Planning Ltd, having established the company in 2006; Hub was acquired by Ridge and Partners LLP in May 2026, where I am now a Partner in the Transport Planning team in Birmingham.
- 1.1.2 I have an honours degree (BSc in Geography) from the University of Sheffield and a postgraduate degree (MSc in Transport Planning and Engineering) from the Institute for Transport Studies at the University of Leeds.
- 1.1.3 I am a member of the Chartered Institute of Logistics and Transport and a member of the Chartered Institute of Highways and Transportation.
- 1.1.4 I am responsible for managing a wide range of transport projects for both private and public sector clients across the UK. I have worked in the field of transport planning and traffic engineering for 28 years and my areas of expertise include transport assessments, transport accessibility and sustainability appraisals, traffic engineering, travel plans, and access feasibility studies.
- 1.1.5 I have represented a variety of both private and public sector clients throughout the planning process, including at Public Inquiries, Local Hearings and Examinations in Public.
- 1.1.6 Hub Transport Planning Ltd was originally instructed by Richborough in 2018 to provide highway and transport information to support their submissions to the local plan process; and then again in 2024 to support their subsequent planning application, in relation to their interests in the Land North of Little Green Lane, Croxley Green.
- 1.1.7 I am fully familiar with the Appeal site and the surrounding highway network.
- 1.1.8 The evidence I have prepared for the Appeal is true and I confirm that the opinions expressed are my true and professional opinions on the matters to which they refer.

1.2 Scope and Nature of Evidence

- 1.2.1 The Appeal was submitted by Richborough ('the Appellant') following the refusal of outline planning permission by Three Rivers District Council ('the Council') on 30th January 2026, for the following:

'Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for childrens social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian/cycleway accesses. A one form entry primary school (Use Class F1(a)) plus expansion land for a two form entry primary school, A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and café provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems, (Layout, scale, appearance and landscape as reserved matters).'
- 1.2.2 The application was reported to the Council's Planning Committee on 22nd January 2026 with a recommendation for approval.

- 1.2.3 However, the committee voted to refuse the application for three reasons.
- 1.2.4 There was no reason for refusal (RfR) relating to highway matters.
- 1.2.5 The Council's latest position statement in their letter dated 24th June 2026 is that they no longer oppose the grant of planning permission, subject to the imposition of appropriately worded conditions and section 106 obligations.
- 1.2.6 The Council's statement notes that two matters remain in issue in relation to the section 106 obligations, one of which is *"a contribution toward step-free access at Croxley Green tube station"*.
- 1.2.7 The Council also confirmed that they expect coordination between parties to discuss, agree and submit a Statement of Common Ground (SoCG) as set out within the CMC Note.
- 1.2.8 There is no objection to the proposed development from the Highway Authority, Hertfordshire County Council (HCC), subject to conditions and S106 payments.
- 1.2.9 The statutory consultee has no objection to the scheme, subject to the obligations set out above. I am advised that the views of the statutory consultee are to be given *"great"* or *"considerable weight"* and that departure from those views requires *"cogent and compelling reasons"*. (See, for example: Shadwell Estates Ltd v Breckland DC and Pigeon (Thetford) Ltd [2013] EWHC 12 (Admin) para. 72, confirmed in relation to highway authorities in Swainsthorpe Parish Council v Norfolk CC [2021] EWHC 1014 (Admin) at [67-70]).
- 1.2.10 There is also no objection from National Highways (NH) in relation to the impact of the development on the Strategic Highway Network (SRN), nor from Active Travel England (ATE).
- 1.2.11 Finally, Transport for London (TfL) has reviewed the application and provided a response requesting a financial contribution towards step-free access at Croxley Underground Station.
- 1.2.12 In respect of the Highways matters and to assist the Inquiry, my evidence sets out the assessment approach; in addition, my evidence considers the financial contribution requested by TfL in respect of the step-free access at Croxley Underground Station.
- 1.2.13 Notwithstanding the content of this proof, it should be noted that I reserve the right to respond to any new evidence on highways or sustainability submitted during the Appeal process.
- 1.2.14 Finally, my evidence concludes below that there are no sound transport or highways reasons why the proposed residential development should not be granted planning permission.

2 THE APPROACH TO ASSESSMENT

2.1 Assessment Chronology

2.1.1 The timeline for the assessment work undertaken to support the planning application is set out below:

- A pre-application site meeting with HCC (Mr Anthony Collier) was undertaken in the summer of 2024;
- A further pre-application meeting was attended in September 2024, following which a scoping report was prepared and submitted to HCC in October 2024;
- Transport Assessment (TA) and Travel Plan (TP) reports were submitted in early 2025, following which comments were received from HCC, TfL and ATE;
- Technical Note 2 (TN2) was prepared in August 2025 to address comments received by NH in respect of the impact of the proposed development on the SRN (CD Ref. 1.49);
- Technical Note 3 (TN3) was prepared in September 2025 to assess the level of trip demand by all modes of travel, in order to address comments raised by TfL in respect of the likely development impact on the transport network for which they are responsible (CD Ref. 1.48);
- An updated TA report was submitted in October 2025 to address the comments received to the TA report, which also incorporated an Active Travel Route Audit to address sustainable issues associated with the proposed development site (CD Ref. 1.32);
- A Transport Assessment Addendum (TAA) report was submitted in December 2025 to address further comments received from HCC as LHA (CD Ref. 1.53).

2.2 Pre-application Meetings and Scoping Report (Sept/Oct 2024)

2.2.1 The focus of the site meeting with Mr Collier was to deliver a site that active and sustainable travel friendly, with discussions relating to on-site walking and cycling provision, including 'Copenhagen' style priority for pedestrians and cyclists, active travel priority toward the Croxley Dane school, public transport improvements to serve the site (including connections to key facilities and transport interchanges), and Local Cycling Walking Infrastructure Plan (LCWIP) improvements.

2.2.2 In addition, it was agreed that consideration should be given to the residential routes towards the site, balancing traffic flows along them and ensuring safe passage for all users.

2.2.3 Highway network capacity assessments were requested at the Baldwins Lane junctions with Links Way and Durrants Drive, Baldwins Lane/A412 roundabout, and on the wider highway network at Sarratt Road and Loudwater Lane (with possible routing towards M25 Junction 18).

2.2.4 The subsequent scoping report set out the vision for the site, putting active and sustainable travel at the forefront, incorporating proposals for cycleway links and a new bus service to directly serve the site.

2.2.5 The scoping report also set out an extensive traffic data collection programme, with traffic counts subsequently undertaken at the following locations in June 2024:

- Little Green Lane/Durrants Drive;

- Little Green Lane/Links Way;
- Little Green Lane/Lincoln Drive;
- Little Green Lane/Norwich Way;
- Baldwins Lane/Links Way;
- A412 Watford Road/New Road;
- A412 Watford Road/Winton Drive;
- A412 Watford Road/Winton Approach;
- A412 Rickmansworth Road/Hagden Lane/Metropolitan Station Approach;
- Manor Way/Baldwins Lane/Repton Way;
- Durrants Drive/Baldwins Lane;
- Rickmansworth Road/Ascot Road; and
- Raven Close/Whippendell Road/Ascot Road.

2.2.6 In addition to the above, automatic traffic counts were also undertaken over a 7-day period in June 2024 at the following locations:

- Little Green Lane, midway between Norwich Way and Durrants Drive;
- Little Green Lane, northeast of Canterbury Way;
- Links Way;
- Canterbury Way;
- Durrants Drive;
- Lincoln Drive;
- Baldwins Lane, west of Lancing Way and east of Repton Way;
- The Green, south of Copthorne Road and north of Old Barn Lane;
- Aldenham Road, north of the A4008 Chalk Hill; and
- Lower High Street, north of the A4125 Eastbury Road.

2.2.7 In terms of modelling of the highway network, the vehicle trip rates submitted in the scoping report were agreed with HCC.

2.2.8 The scoping report set out that 1FE school, retail offering and country park would primarily serve only the site and immediate residential area and, ultimately, would not result in much external net traffic movements; particularly given the propensity for such uses to reduce the need to travel to/from the site. This point was accepted by HCC at a meeting in October 2024; however, subsequent tests on the SRN did include some external traffic generation for these elements of the proposed development site.

2.3 TA and TP Reports (Jan 2025)

- 2.3.1 The initial TA report set out the access proposals for the site, with vehicular and pedestrian/cycle access proposed from two locations, across Little Green Lane opposite Durrants Drive and opposite Links Way.
- 2.3.2 The site access drawings and proving layout were designed and tested to demonstrate that access was achievable by all required vehicles (including refuse and servicing).
- 2.3.3 Consideration was also given to the possibility for emergency access to potential sports pitches towards the north of the site via the metalled carriageway of Rousebarn Lane, but ultimately this proposal was dropped.
- 2.3.4 Pedestrian and cycle improvements were proposed to HCC and a meeting was held with HCC officers and engineers to discuss these; those discussions centred around the need to retain carriageway width on Durrants Drive to accommodate the proposed bus service, and the conflict with possible Copenhagen style active travel improvements on that street. Links Way was considered to be the more promising option with provision along the eastern side of the carriageway giving direct access to Croxley Danes school, however, ultimately the removal of trees and steepness of the internal layout from Links Way was not considered a favourable outcome.
- 2.3.5 In addition, ATE's subsequent comments on the application helped to inform the eventual agreed solution in terms of the active travel proposals; these also included the provision of Beryl Bike at the square on the development site, and active travel route audits towards Watford Station and Croxley Station.
- 2.3.6 In terms of the traffic impact and capacity assessment work, the TA report set out development traffic assignment based on the HCC COMET model, and capacity analysis for an agreed assessment year of 2030.
- 2.3.7 A number of consultation comments were provided by HCC, NH, ATE and TfL; comments were also received from the Parish Council.
- 2.3.8 The consultation comments covered various issues, including (but not limited to):
- On-street parking at the northern end of Durrants Drive and whether there was any opportunity to provide additional resident parking;
 - Consideration of raised table provision on Little Green Lane;
 - Further design considerations in respect of the proposed footway/cycleway provision across the local highway network;
 - Stage 1 Road Safety Audit (RSA) required for the proposed site access arrangements;
 - Amendments to the vehicle trip generation and a request from ATE for trip rates by mode;
 - Additional accident data and analysis;
 - HCC request for more parking to be provided on site;
 - Additional traffic modelling requested;
 - Higher mode shift target requested along with TRICS SAM monitoring;

- NH request for confirmation of traffic that would affect the SRN, including the local facilities on the site.

2.3.9 In respect of the comments received from Transport for London (TfL), they stated that they would seek a contribution from the development site towards step-free access (2 lifts) at Croyley Underground Station which, at the time of the request, was noted in press releases as potentially costing upwards of £10m.

2.3.10 I deal specifically with the TfL contribution request later in my evidence.

2.3.11 The consultation responses led to a comprehensive update and resubmission of the TA report, with revision E dated October 2025.

2.4 Technical Note 2 (Aug 2025)

2.4.1 Technical Note 2 (TN2) was prepared to address the consultation response from NH regarding the impact of the development site on the SRN.

2.4.2 The note was prepared following the initial request from NH to clarify the number of traffic movements that were forecast to impact M25 Junction 18 and M1 Junction 5.

2.4.3 The subsequent response from NH requested that a modelling exercise was undertaken at both junctions.

2.4.4 However, TN2 confirmed that the development traffic impact at the M1 junction, based robustly on observed traffic count data from 2023, was negligible, as shown in Table 1 below.

Table 1 – Development Site Traffic Impact at M1 Junction 5

Link	2023 Base Traffic	Dev Traffic	% Impact
AM PEAK HOUR			
M1 (N) Entry to Gyratory	1883	15	0.80%
M1 (S) Entry to Gyratory	1148	27	2.35%
M1 (N) Exit from Gyratory	1207	15	1.24%
M1 (S) Exit from Gyratory	1347	29	2.15%
Total Entry to Gyratory	6238	42	0.67%
PM PEAK HOUR			
M1 (N) Entry to Gyratory	1368	15	1.10%
M1 (S) Entry to Gyratory	1575	26	1.65%
M1 (N) Exit from Gyratory	1499	15	1.00%
M1 (S) Exit from Gyratory	1084	28	2.58%
Total Entry to Gyratory	5977	41	0.69%

- 2.4.5 It is clear from the data in Table 1 that the development traffic impact at M1 Junction 5 is negligible.
- 2.4.6 TN2 notes that the development site traffic would be unlikely to add more than one vehicle to the queue on the M1 (N) entry to the gyratory and no more than two vehicles to the queue on the M1 (S) entry to the gyratory, in either the AM or PM peak hours.
- 2.4.7 At M25 Junction 18, a similar exercise was undertaken utilising 2019 base traffic flows (the same as that for a nearby committed development application).
- 2.4.8 This confirmed that the development traffic impact at the M25 junction, based robustly on observed traffic count data from 2019, was minimal, as shown in Table 2 below.

Table 2 – Development Site Traffic Impact at M25 Junction 18

Link	2023 Base Traffic	Dev Traffic	% Impact
AM PEAK HOUR			
M25 (N) Off Slip	749	5	0.67%
M25 (S) Off Slip	440	34	7.73%
M25 (N) On Slip	1041	16	1.54%
M25 (S) On Slip	219	50	22.83%
PM PEAK HOUR			
M25 (N) Off Slip	667	5	0.75%
M25 (S) Off Slip	195	33	16.92%
M25 (N) On Slip	1041	15	1.44%
M25 (S) On Slip	234	49	20.94%

- 2.4.9 As shown in Table 2 above, the M25 (N) On Slip and Off Slip impacts are clearly negligible at less than 1% for the Off Slip impacts, and less than 2% for the On Slip impacts, in both peak hours.
- 2.4.10 The impacts on the M25 (S) On and Off Slip impacts only reach the levels shown because the baseline traffic flows using these slip roads are low by typical motorway standards.
- 2.4.11 The additional development traffic represents less than one vehicle per minute on average in either peak hour which will easily be accommodated on the slip roads to/from the M25 (S).
- 2.4.12 This position was subsequently accepted by NH.

2.5 Technical Note 3 (Sept 2025)

- 2.5.1 Technical Note 3 (TN3) was prepared to address the consultation response from TfL regarding the impact of the development site on their transport network; and with a view to assessing a fair and reasonable contribution towards the step-free access at Croxley Station that TfL had requested in their initial consultation response.

- 2.5.2 TN3 concludes that between 52 and 76 person trips might utilise Croxley Station (and Watford Station equally) during the peak hours.
- 2.5.3 Following submission of TN3 to HCC and TfL, a request was made by TfL for a financial contribution of £1,065,000 towards the delivery of step-free access at Croxley Underground Station.
- 2.5.4 I set out my response to this request later in my evidence.

2.6 Updated TA Report (Oct 2025)

- 2.6.1 The updated TA report provided a response to the consultation comments from HCC, ATE and TfL.
- 2.6.2 In respect to the site access junctions, these are set out in Section 4.0 of the updated TA report, but also provided (for ease of reference) within **Appendix H1** to my evidence.
- 2.6.3 The drawings have been subject to a Stage 1 RSA and updated following the recommendations set out within the safety audit.
- 2.6.4 Section 4.0 also sets out the Active Travel Audit undertaken and notes the LCWIP proposals too, all of which helped inform the agreed contributions as set out in the 'Planning Agreement and Infrastructure Statement of Common Ground' (SoCG) with HCC and Three Rivers District Council, dated 29th June 2026.
- 2.6.5 Under 'Transport Matters and Accessibility' the SoCG identifies a contribution of £1,955,000 towards the following items:
- Dedicated Bus Service (new half-hourly service between Watford and Rickmansworth, calling at Watford train station, Croxley train station and Watford Junction station);
 - Rousebarn Lane upgrade;
 - LCWIP contribution towards Watford and Three Rivers Route 2 improvements;
 - Beryl Bikes – expansion and docking station provision;
 - Travel Plan evaluation (HCC fee);
 - Travel vouchers and car-share scheme.
- 2.6.6 In respect of the bus service, it is worth highlighting that the proposed service has been comprehensively considered and planned by HCC in order to ensure that the service provided can fulfil the requirements of the development site.
- 2.6.7 HCC's officer, Robert Handbury has worked in the bus industry since 1989 and the majority of his career has been involved in network planning, both on behalf of bus operators (at Arriva Midlands) and now as part of HCC.
- 2.6.8 The consideration was a 30-minute service as the base position, with service 322 also considered as a possibility (for extension into the site), as it currently operates between Croxley Green and Watford. However, there was a requirement from the outset to serve Watford Metropolitan Station, as well as Watford Junction and Rickmansworth Rail Stations – to this end, serving the Metropolitan Station means that it would be unworkable to also serve the Hospital. It should also be noted that 322 operates via the Hospital already.

- 2.6.9 The costing of the service is based on Mr Handbury's extensive experience and is a conservative assessment that assumes top-end tender submissions from operators such as Arriva (rather than cheaper alternative options submitted by smaller operators).
- 2.6.10 In respect of the vehicle, it is expected to be a midi type bus of between 23 and 29 seats, in order to ensure that it is attractive, but isn't too big to be able to negotiate the residential estate roads.
- 2.6.11 Finally, in respect of longevity of the service, HCC consider the destinations to be attractive, and note that Watford is area of a significant future growth that will assist in the long-term future of public transport, for both the town and nearby districts.
- 2.6.12 In addition, a contribution of £1,568,538 is also agreed towards LCWIP scheme proposals locally, to incorporate an area-wide 20mph speed limit, inclusive of on-street cycling measures, bus stop upgrades/installation, and site access and vegetation clearance (to be secured vis S278 agreement).
- 2.6.13 The traffic capacity analysis undertaken is set out in Section 6.0 of the updated TA report and demonstrates that the impact of the proposed development site is minimal across much of the surrounding highway network.
- 2.6.14 Even where junctions are approaching or slightly exceeding practical capacity (an RFC of 0.85), it is clear from the results that the impact of the development traffic is far from reaching the 'severe' threshold as set out in paragraph 116 of the National Planning Policy Framework (NPPF, CD Ref. 7.27).

2.7 TA Addendum Report (Dec 2025)

- 2.7.1 A TA Addendum (TAA) report was prepared and submitted to HCC in December 2025 to address further consultation responses.
- 2.7.2 In particular, the TAA report highlights that the starting point was to look at fully segregated 'Copenhagen' style routes for pedestrians and cyclists as far as Croxley Danes School.
- 2.7.3 However, retrofitting such proposals did not prove possible.
- 2.7.4 As such, consideration was given to the provision of shared footway/cycleway provision through the residential estate to the south; however, consultation with ATE identified that they did not favour such schemes, although they acknowledged that HCC were content with a suitable shared footway/cycleway scheme and that they would not therefore object.
- 2.7.5 However, their preference was that an on-street cycling scheme should be considered.
- 2.7.6 The Stage 1 RSA undertaken on the shared footway/cycleway scheme identified potential issues and specifically recommended that an on-street cycling scheme should be considered.
- 2.7.7 Therefore, following further consultation with HCC it was agreed that an on-street cycling scheme should be considered.
- 2.7.8 In order to pursue this scheme HCC recommended that additional speed/traffic surveys should be undertaken through the residential estate to the south of the proposal scheme, and this is set out in detail in Section 3.0 of the TAA.
- 2.7.9 Sections 4.0 and 5.0 of the TAA subsequently set out the speed management proposals for the local area and how the eventual proposals would accord with relevant design guidance from LTN 1/20.

- 2.7.10 HCC accepted the outcome of this additional analysis and agreed the approach to provide an area-wide traffic-calming scheme with on-street cycle facilities.

2.8 National Planning Policy Framework (NPPF) Guidance

- 2.8.1 The relevant policies of the NPPF are set out at paragraphs 110, 115 and 116.
- 2.8.2 In accordance with paragraph 110 of the NPPF, the Appeal site will constitute sustainable development and offer a genuine choice of transport modes through the delivery of the agreed mitigation.
- 2.8.3 In accordance with paragraph 115 a) of the NPPF and taking into account the Appeal site location, the proposals deliver a sustainable transport vision for the development.
- 2.8.4 In accordance with paragraph 115 b), safe and suitable access can be provided for all users of the Appeal site.
- 2.8.5 In accordance with paragraph 115 d) of the NPPF, the impacts of the Appeal site can be effectively mitigated on the transport network.
- 2.8.6 In accordance with paragraph 116 of the NPPF, subject to the agreed contributions and mitigation proposals, the residual cumulative impacts of the Appeal site on the road network will not be severe, taking into account all reasonable future scenarios.
- 2.8.7 Finally, in accordance with paragraph 116 of the NPPF, the Appeal site will not have an unacceptable impact on highway safety.

3 TFL FINANCIAL CONTRIBUTION

3.1 TfL Consultation Responses and Correspondence

- 3.1.1 TfL has provided two consultation responses to the application for the proposed development site, both of which are attached at **Appendix H2** to my evidence.
- 3.1.2 The first consultation response in March 2025 stated that TfL would request a contribution towards the funding for step-free access at Croxley Underground station, as well as measures to improve active travel routes, cycle parking and bus links from the development site.
- 3.1.3 TfL supported the intention (at the time of the first response) to undertake the Active Travel Audit on the route to Croxley Station, and for bus connectivity to the station.
- 3.1.4 TfL also requested that the potential impacts of the proposed development on their services and infrastructure, including at Croxley Station, be considered, using approved TfL data sources.
- 3.1.5 The second consultation response in November 2025 stated that throughout the engagement process for the application, it has been consistently acknowledged that a financial contribution would be sought towards the step-free access at Croxley Station.
- 3.1.6 TfL stated that they accepted the Hub assessment data in respect of the potential impact of the development site on the station, which indicated that the trips generated by the development would represent an increase of 7.1% compared to existing usage.
- 3.1.7 Accordingly, TfL are seeking a financial contribution of £1,065,000 towards the delivery of the step-free access at Croxley Station.

3.2 Evidence for the Requested Contribution

- 3.2.1 During the course of the application, and following submission of the Appeal, the Appellant has been chasing TfL for confirmation in respect of the requested contribution amount.
- 3.2.2 The latest email correspondence through May, June and July is also included within **Appendix H2** to my evidence.
- 3.2.3 It is clear from the correspondence with TfL that they are yet to confirm how the step-free access costs for Croxley Station have been derived, and therefore also how the Appeal site contribution has been calculated.
- 3.2.4 At the time of the original request by TfL, Hub were requested to provide trip impact analysis in order to help determine an appropriate contribution towards the station improvements; at the time of undertaking that analysis, the step-free proposal for the station was subject to press articles with an expectation that it would be delivered in due course.
- 3.2.5 However, TfL are yet to provide a costing schedule for the scheme, from which an appropriate contribution can be derived.
- 3.2.6 In trying to seek some clarification in respect of the requested contribution, I have noted that a Freedom of Information (FOI) request was made to TfL on 17th June 2025 in respect of the Tube stations on TfL's 'Step-Free Access Consideration List'.
- 3.2.7 The FOI correspondence is provided as **Appendix H3** to my evidence.

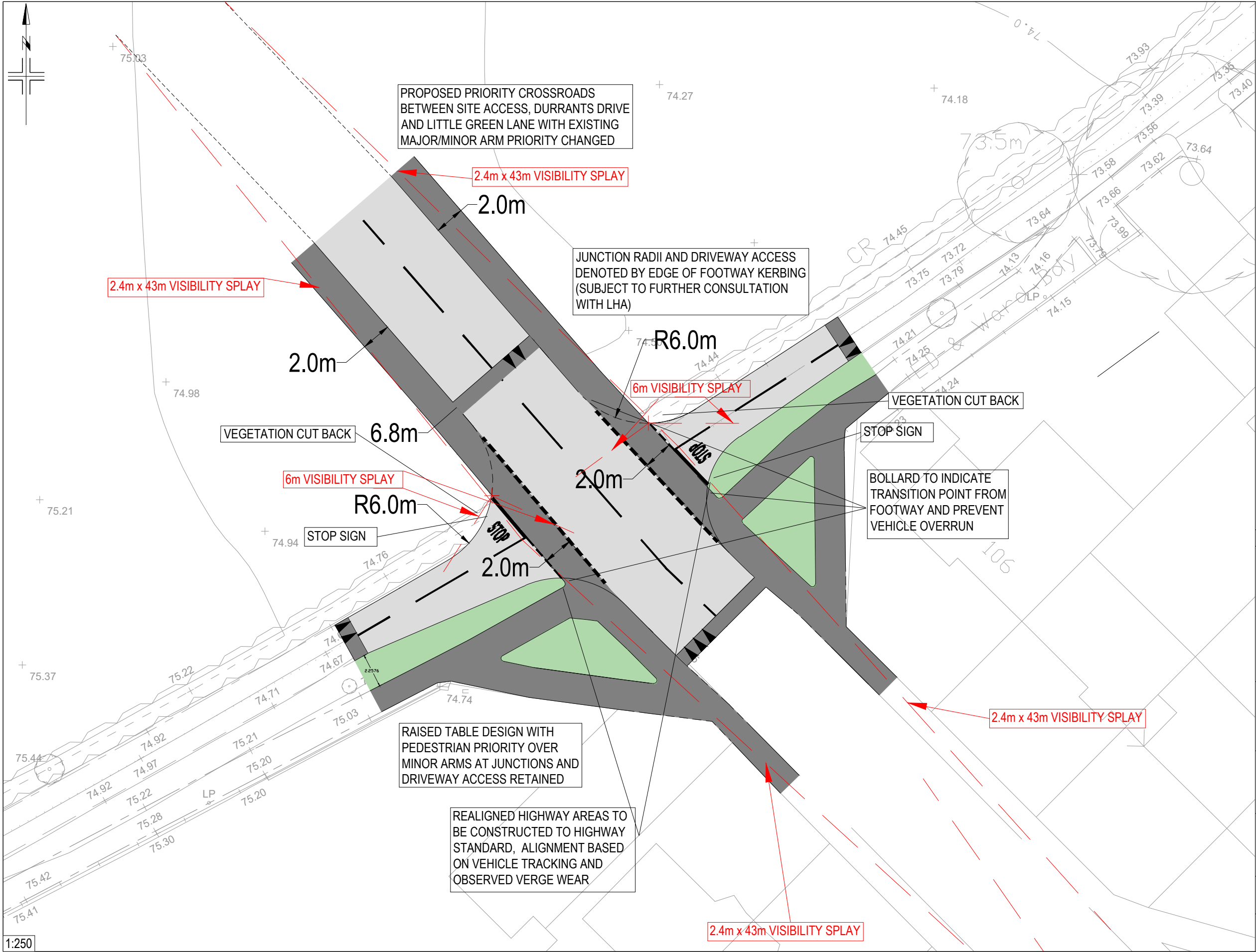
- 3.2.8 The FOI response from TfL provides a longlist of 30 stations that TfL state has been prioritised and will be shortlisted to 15 stations by October 2025.
- 3.2.9 However, it is important to note that the longlist of 30 stations does not include Croxley Underground Station.
- 3.2.10 Therefore, on the basis of this FOI request and the confirmation from TfL that the shortlist would be finalised by October 2025, it isn't clear at this time how TfL are able to justify their request for the step-free access contribution to Croxley Station.
- 3.2.11 The Appellant is still seeking clarification from TfL in respect of this request and is hopeful that it can be clarified fully during the course of the Appeal process.

4 SUMMARY AND CONCLUSION

- 4.1.1 My evidence has set out the approach to the assessment of the site and demonstrated the comprehensive work that has been undertaken in order to address all requests from HCC, NH, ATE and TfL, in respect of the Appeal site on Land North of Little Lane, Croxley Green.
- 4.1.2 There is no objection to the proposed development from the Local Planning Authority, or from HCC, as Local Highway Authority, who agree that safe and suitable access can be provided to the Appeal site, and that the development offers a genuine choice for all modes of travel.
- 4.1.3 In respect of the traffic impacts and modelling, the proposal has been assessed in line with the requirements of the highway authority and NH and proposes mitigation where required to address the highway network impacts; the mitigation has been agreed with HCC as highway authority.
- 4.1.4 The Appeal site is within a comfortable walking and cycling distance of local facilities within Croxley Green and also provides sustainable and active travel connections to Rickmansworth and Watford.
- 4.1.5 The Appeal site will also provide a contribution of more than £3.5m towards active travel, traffic-calming and a new bus service that will connect the site to Watford and local train stations, including Croxley Underground Station.
- 4.1.6 The bus service and infrastructure proposals are aligned with national and local guidance and, as such I conclude that the Appeal site is sustainable in respect of access to services and facilities.
- 4.1.7 I therefore conclude that, from a transport and highways perspective, there is no reason why planning consent should not be given to the proposed development scheme.

Appendix H1

Access Drawings



- 1. THIS DRAWING IS NOT TO BE SCALED FOR CONSTRUCTION PURPOSES.
- 2. THE CONTRACTOR SHALL CHECK ALL DIMENSIONS AND LEVELS ON SITE.

E	UPDATED FOLLOWING RSA	01.08.25	NB	GM
D	UPDATED FOLLOWING LHA COMMENTS	09.06.25	BHB	GM
C	UPDATED FOLLOWING CLIENT COMMENTS	14.01.25	BHB	GM
B	UPDATED FOLLOWING CLIENT COMMENTS	10.01.25	BHB	GM
A	UPDATED FOLLOWING LHA COMMENTS	07.01.25	BHB	GM

REV	DESCRIPTION	DATE	BY	AUTH
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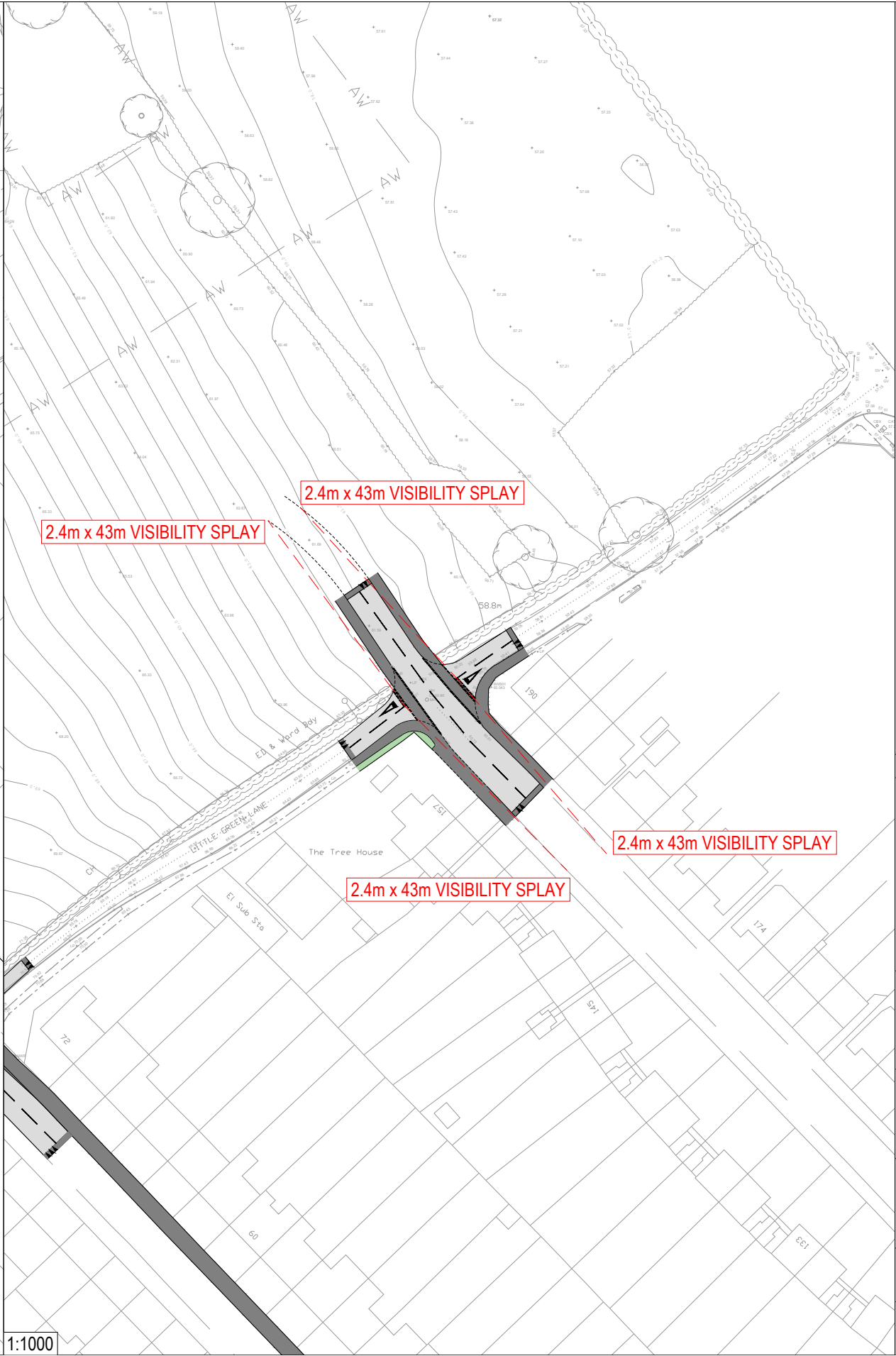
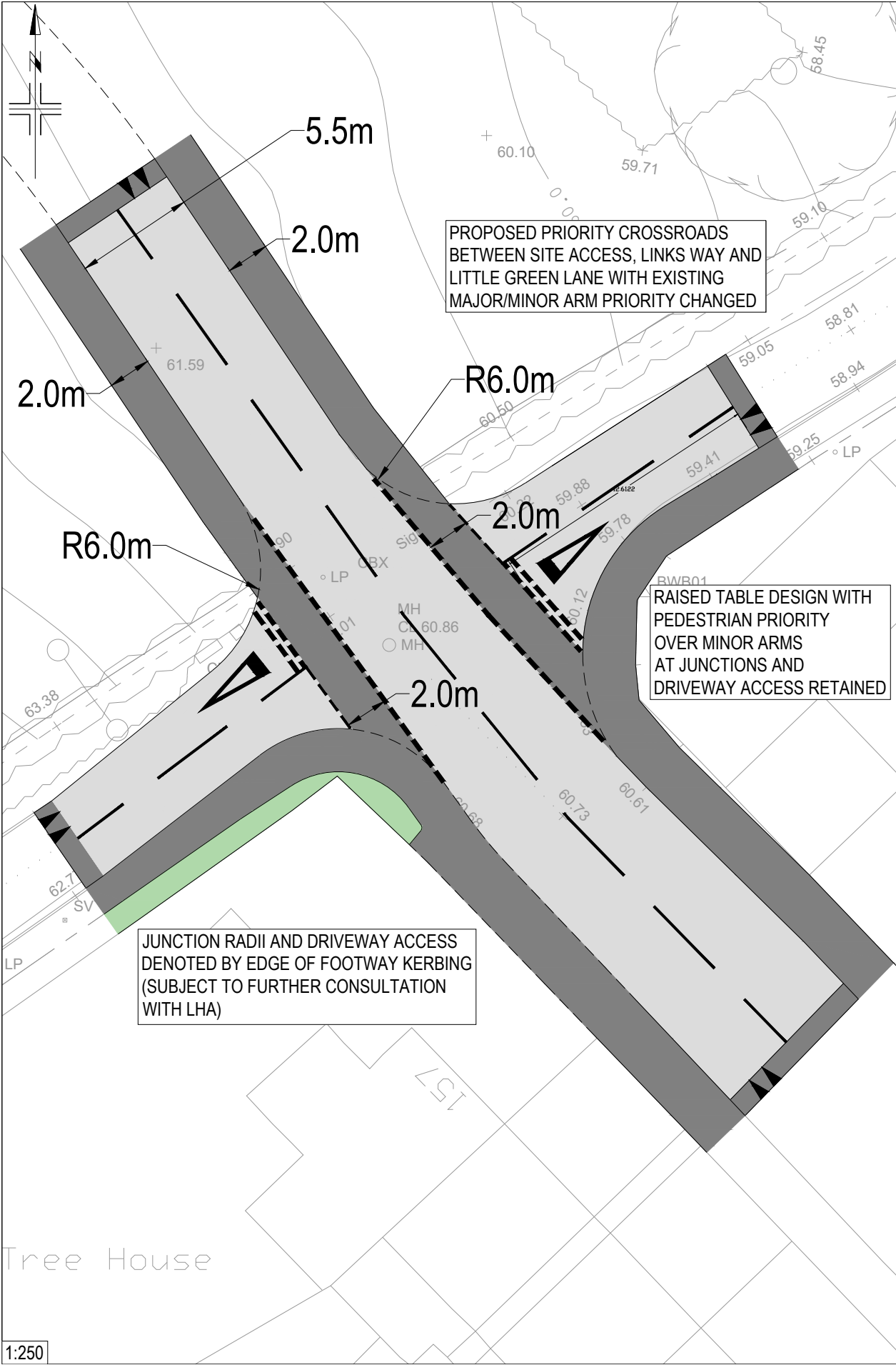
CLIENT
RICHBOROUGH

PROJECT
LITTLE GREEN LANE
CROXLEY GREEN

TITLE
PROPOSED SITE ACCESS
DURRANTS DRIVE

DRAWN	AUTHORISED	SCALE	SHEET SIZE	DATE
NB	GM	AS SHOWN	A3	09.06.25

PROJECT NO.	DRAWING NO.	REV
T24544	001	E



1. THIS DRAWING IS NOT TO BE SCALED FOR CONSTRUCTION PURPOSES.
2. THE CONTRACTOR SHALL CHECK ALL DIMENSIONS AND LEVELS ON SITE.

D	UPDATED FOLLOWING CLIENT COMMENTS	09.05.25	BHB	GM
C	UPDATED FOLLOWING CLIENT COMMENTS	14.01.25	BHB	GM
B	UPDATED FOLLOWING CLIENT COMMENTS	10.01.25	BHB	GM
A	UPDATED FOLLOWING LHA COMMENTS	07.01.25	BHB	GM

REV	DESCRIPTION	DATE	BY	AUTH
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hub
TRANSPORT PLANNING LTD

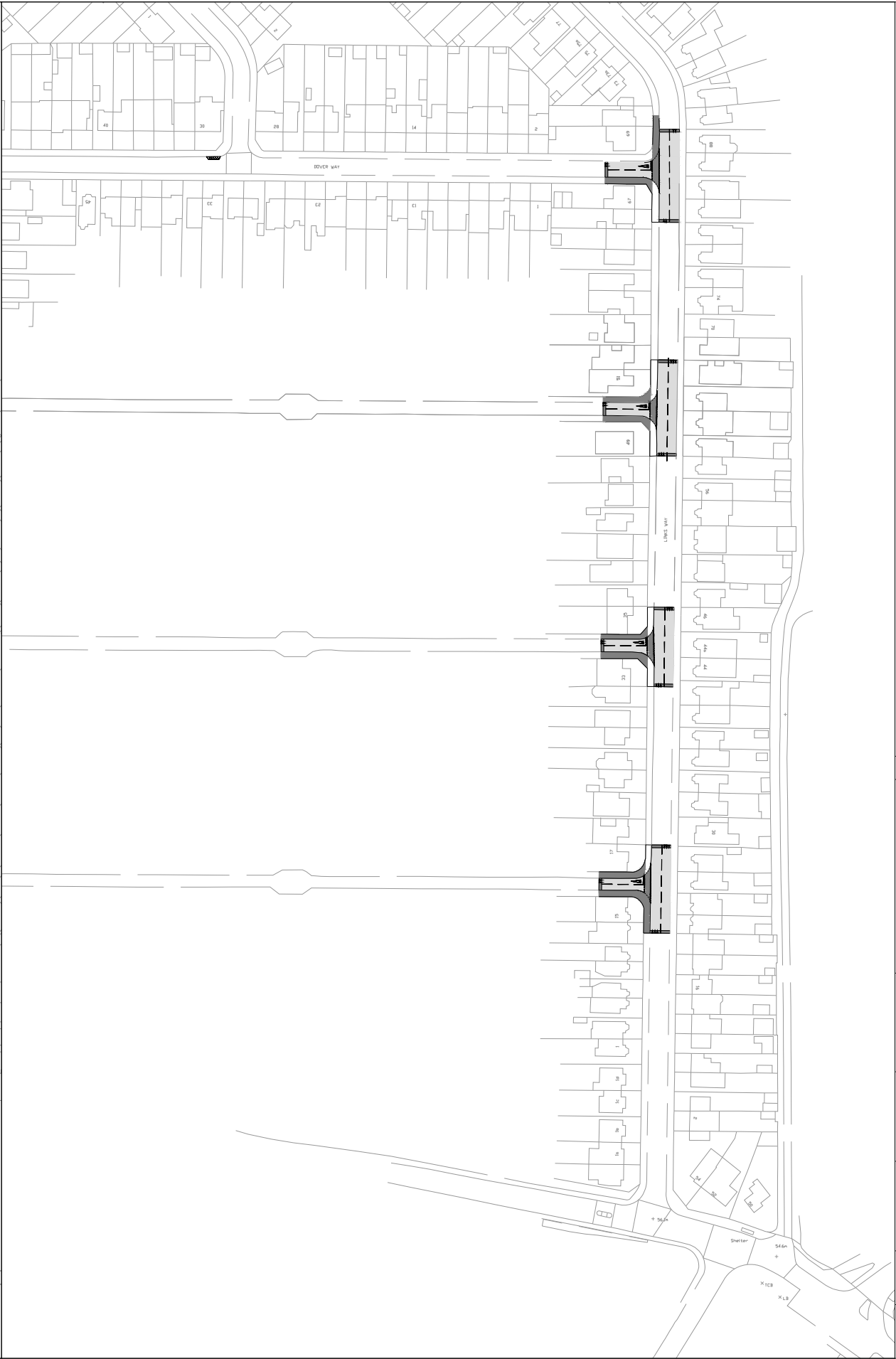
Hub Transport Planning Ltd
Floor 1B
4 Temple Row
Birmingham
B2 5HG
T : 0121 454 5530

CLIENT
RICHBOROUGH

PROJECT
**LITTLE GREEN LANE
CROXLEY GREEN**

TITLE
**PROPOSED SITE ACCESS
LINKS WAY**

DRAWN BHB	AUTHORISED GM	SCALE AS SHOWN	SHEET SIZE A3	DATE 17.12.24
PROJECT NO. T24544		DRAWING NO. 002		REV D



1. THIS DRAWING IS NOT TO BE SCALED FOR CONSTRUCTION PURPOSES.
2. THE CONTRACTOR SHALL CHECK ALL DIMENSIONS AND LEVELS ON SITE.

F	UPDATED PARKING DESIGN	23.10.25	NB	GM
E	UPDATED DESIGN	03.07.25	NB	GM
D	UPDATED FOLLOWING CLIENT COMMENTS	09.06.25	BHB	GM
C	UPDATED FOLLOWING CLIENT COMMENTS	14.01.25	BHB	GM
B	UPDATED FOLLOWING CLIENT COMMENTS	10.01.25	BHB	GM
A	UPDATED FOLLOWING LHA COMMENTS	07.01.25	BHB	GM

REV	DESCRIPTION	DATE	BY	AUTH
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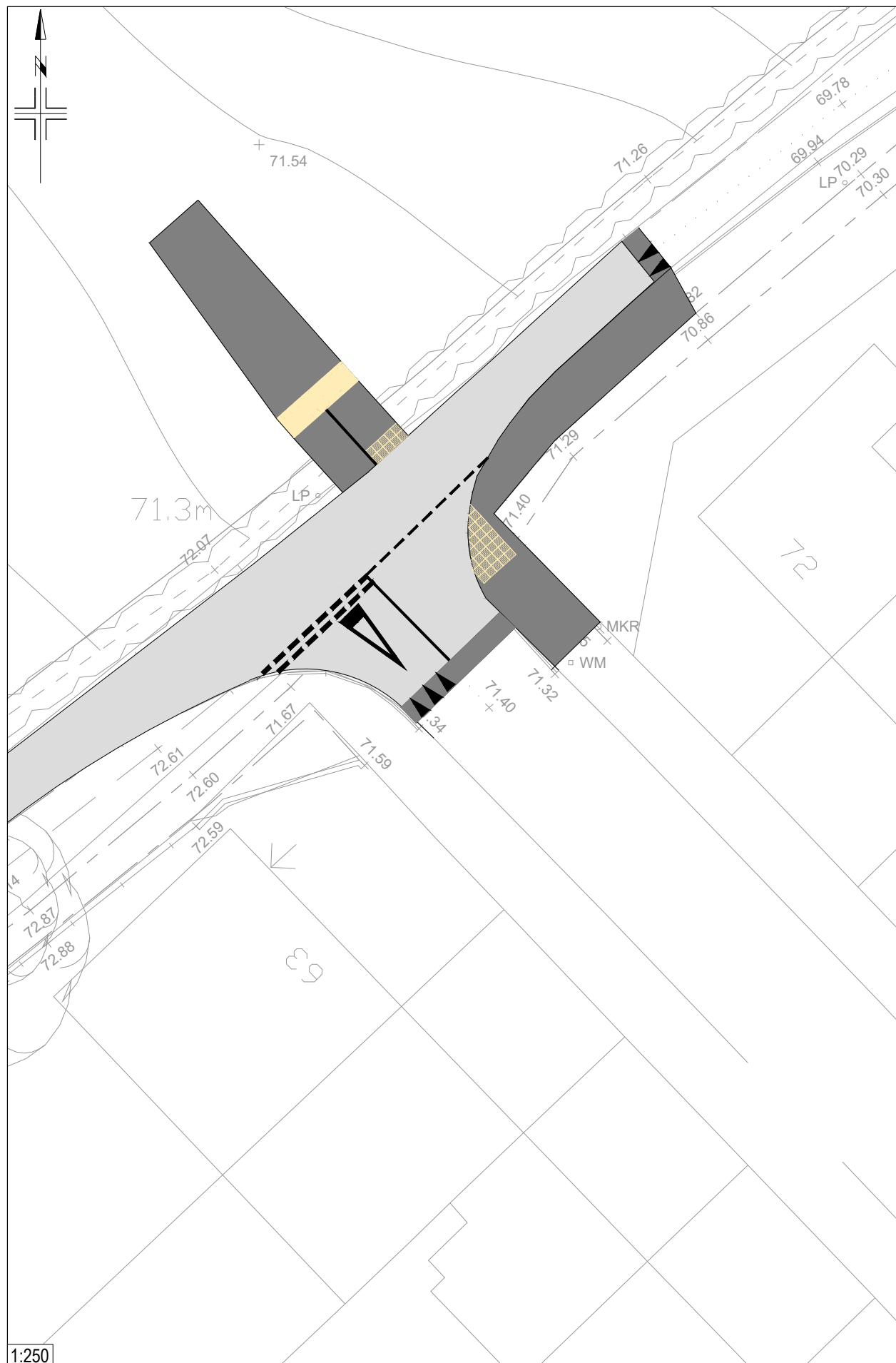
Hub Transport Planning Ltd
Floor 1B
4 Temple Row
Birmingham
B2 5HG
T : 0121 454 5530

CLIENT
RICHBOROUGH

PROJECT
**LITTLE GREEN LANE
CROXLEY GREEN**

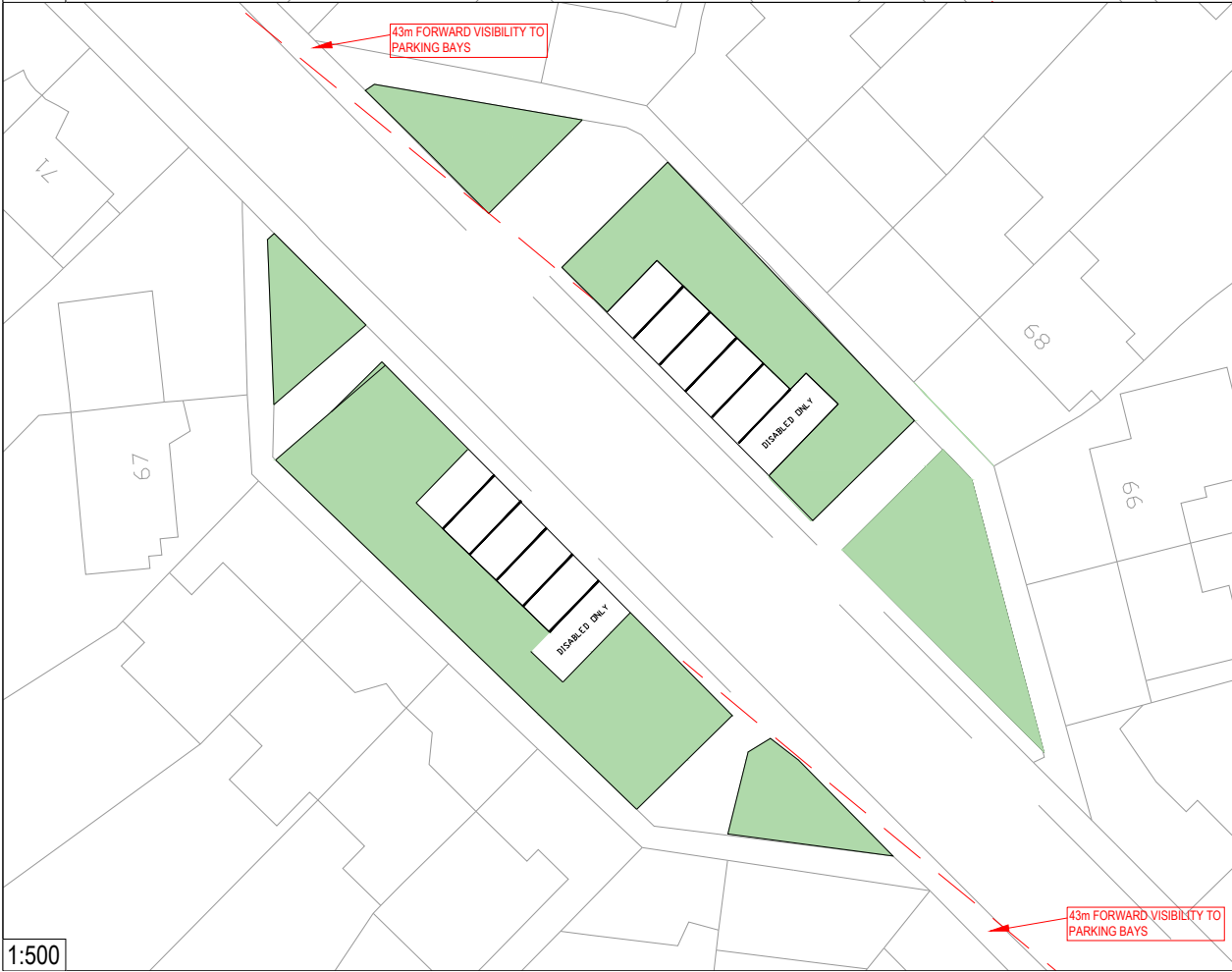
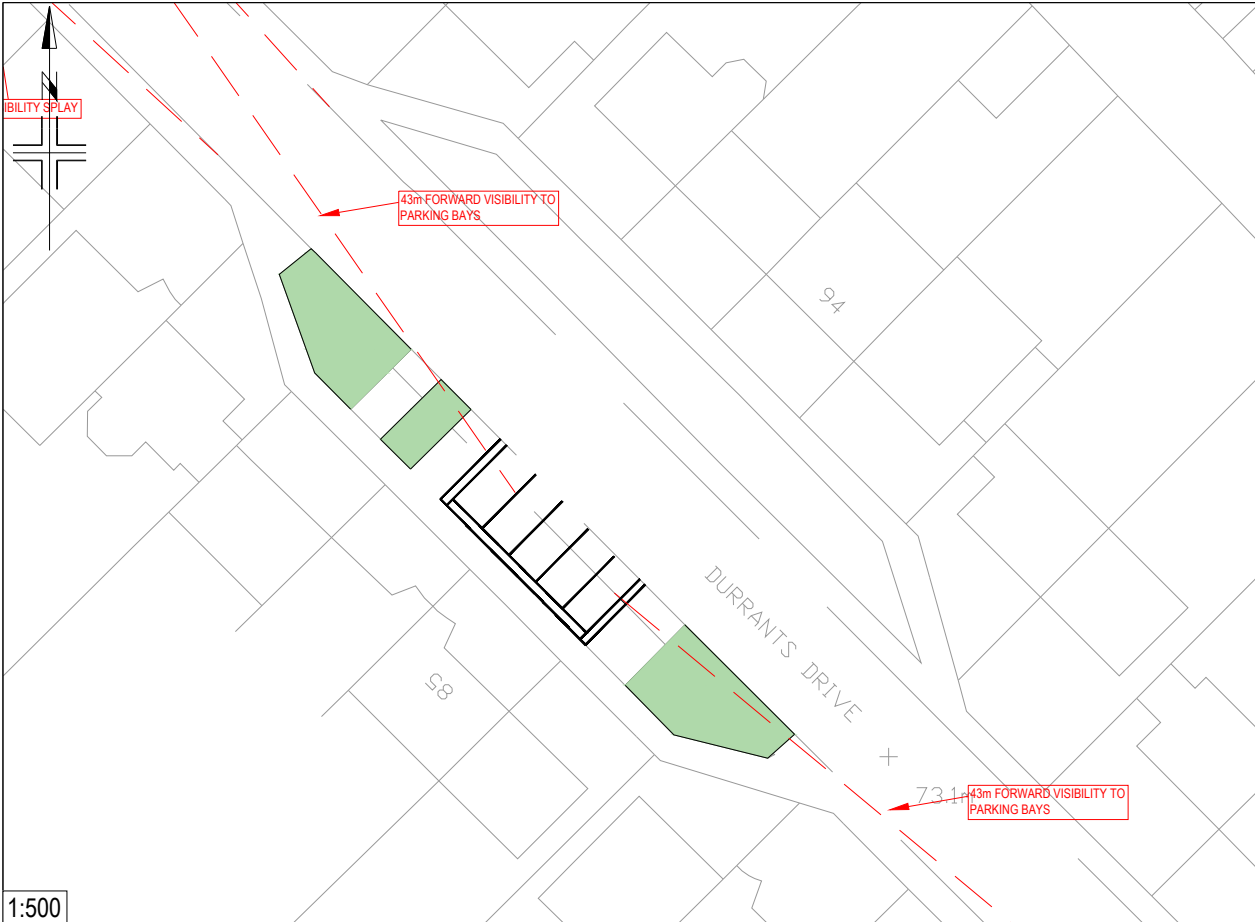
TITLE
**PROPOSED SITE ACCESS
SHARED FOOTWAY/CYCLEWAY**

DRAWN BHB	AUTHORISED GM	SCALE 1:2000	SHEET SIZE A3	DATE 17.12.24
PROJECT NO. T24544		DRAWING NO. 003		REV F



1. THIS DRAWING IS NOT TO BE SCALED FOR CONSTRUCTION PURPOSES.
2. THE CONTRACTOR SHALL CHECK ALL DIMENSIONS AND LEVELS ON SITE.

B	UPDATED DESIGN	23.10.25	NB	GM
A	UPDATED DESIGN	03.07.25	NB	GM
REV	DESCRIPTION	DATE	BY	AUTH
 Hub Transport Planning Ltd Floor 1B 4 Temple Row Birmingham B2 5HG T : 0121 454 5530				
CLIENT RICHBOROUGH				
PROJECT LITTLE GREEN LANE CROXLEY GREEN				
TITLE PROPOSED SITE ACCESS SHARED FOOTWAY/CYCLEWAY				
DRAWN BHB	AUTHORISED GM	SCALE AS SHOWN	SHEET SIZE A3	DATE 09.06.25
PROJECT NO. T24544		DRAWING NO. 004		REV B



1. THIS DRAWING IS NOT TO BE SCALED FOR CONSTRUCTION PURPOSES.
2. THE CONTRACTOR SHALL CHECK ALL DIMENSIONS AND LEVELS ON SITE.

C	FORWARD VISIBILITY ADDED	23.10.25	NB	GM
B	FORWARD VISIBILITY ADDED	01.08.25	NB	GM
A	DESIGN REVISION	03.07.25	NB	GM

REV	DESCRIPTION	DATE	BY	AUTH
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Hub Transport Planning Ltd
Floor 1B
4 Temple Row
Birmingham
B2 5HG
T : 0121 454 5530

CLIENT
RICHBOROUGH

PROJECT
**LITTLE GREEN LANE
CROXLEY GREEN**

TITLE
POTENTIAL PARKING PROVISION

DRAWN NB	AUTHORISED GM	SCALE AS SHOWN	SHEET SIZE A3	DATE 09.06.25
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PROJECT NO. T24544	DRAWING NO. 005	REV C
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Appendix H2

TfL Consultation Responses and Correspondence

Consultee Comments for Planning Application

24/1367/PREAPP

Application Summary

Application Number: 24/1367/PREAPP

Address: Land Opposite Junction Of Links Way Little Green Lane Croxley Green Hertfordshire

Proposal: Proposed development for up to 600 new residential dwellings, including a 1FE Primary School (plus expansion land for 2FE), mixed use local centre including a medical centre, open and green space with associated infrastructure, all matters reserved except for vehicular access from Little Green Lane.

Case Officer: Claire Westwood

Consultee Details

Name: Richard Carr

Address: TfL Spatial Planning, 8th floor, 5 Endeavour Square, London E20 1JN

Email: Not Available

On Behalf Of: Transport For London NS

Comments

Thank you for consulting Transport for London (TfL) at the pre-application stage.

We would encourage the applicant to aim to maximise travel by sustainable modes including improved access to Croxley Underground station on the Metropolitan line. Station access improvements should include a funding contribution towards the potential provision of step-free access at the station as well as measures to improve active travel routes, cycle parking and bus links from the development site. We support the intention to carry out an active travel audit on the route to Croxley station to identify measures that may be required. If bus links are to be provided from the development to Croxley station, consideration will also need to be given to bus stopping and standing arrangements outside the station.

As part of the Transport Assessment we would expect the applicant to consider the potential impacts of the proposed development on TfL services and infrastructure including at Croxley station. A full station capacity assessment should be carried using approved TfL data sources.

We hope that these comments can be included in the pre-application advice to the applicant.

FAO Claire Westwood

24/2073/OUT- Land To North of Little Green Croxley Green, WD3 3SP

Thank you for consulting Transport for London (TfL) on this application. We provided initial comments in March 2025, and the applicant has since submitted further information. The following comments are based on that additional material.

Throughout the engagement process regarding the development proposals at this site, it has been consistently acknowledged that a financial contribution would be sought towards step-free access at Croxley Underground Station.

The applicant has considered the potential impacts of the proposed development on Croxley Underground Station. Whilst a full station capacity assessment, as requested, has not been undertaken, we are prepared to accept the data provided to date. This indicates that trips generated by the development would represent an increase of 7.1 percent compared to existing usage.

Accordingly, TfL seeks a financial contribution of £1,065,000 towards the delivery of step-free access at Croxley Underground Station.

James Parker

From: Evans, Christian <[REDACTED]>
Sent: 16 July 2026 15:38
To: Kayley Smith
Cc: nick.banks; James Parker; AustinFell, Cameron; owen.weaver
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

Follow Up Flag: Follow up
Flag Status: Flagged

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THINK: Be cautious before clicking on links or opening attachments.

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Hi Kayley

Would you be able to provide an update on this please?

Kind regards,

Christian Evans, MSc MRTPI | Senior Planner

Direct +44 (0) [REDACTED] | Mobile +44 [REDACTED] | [REDACTED]

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Registered Office: 101 Park Drive, Milton Park, Abingdon, Oxfordshire, England, OX14 4RY



From: Kayley Smith <[REDACTED]>
Sent: 25 June 2026 15:24
To: Evans, Christian <[REDACTED]>
Cc: nick.banks <[REDACTED]> James Parker <[REDACTED]> AustinFell, Cameron <[REDACTED]> owen.weaver <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

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Hello Christian,

Unfortunately we will not be able to provide any further information than the information sent on 23RD June until next week due to leave. We will ensure that these matters are progressed.

Kind Regards,

Kayley Smith (she/her/hers)

Principal Area Planner (West and Out of London)

Spatial Planning | Customer and Strategy

Transport for London | 5 Endeavour Square, 8th floor | Palestra, 11th floor

From: Evans, Christian <[REDACTED]>
Sent: 24 June 2026 13:07
To: Kayley Smith <[REDACTED]>
Cc: nick.banks <[REDACTED]> James Parker <[REDACTED]> AustinFell, Cameron <[REDACTED]> owen.weaver <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

Good afternoon Kayley

Thank you for coming back to us.

It is helpful to understand that the current figure is based on costings from TfL's Tier 1 delivery partner following the feasibility work undertaken to date. However, given the Inspector's deadline of 29 June for confirming the matters in dispute within the Section 106 agreement, we do need to understand the programme for TfL providing the supporting information and engaging meaningfully with the appellant team.

At present, we still do not have sufficient information to understand the scope of works assumed, the basis of the cost estimate, or how any contribution from this appeal scheme has been calculated and apportioned. Without that, it will be difficult for the parties to agree the obligation or narrow the point of dispute in a way that assists the Inspector.

Please could you therefore confirm:

1. When TfL expects to have its formal cost estimate available;
2. Whether the feasibility report, or relevant extracts from it, can be shared with the appellant team;
3. The scope of works assumed in the current estimate, including whether it relates solely to step-free access or includes wider station works;

We have also seen TfL's 2024 press release - [TfL confirms the next 12 Tube stations to be prioritised for step-free access, as work on improving accessibility of Underground network gathers pace](#) - identifying Croxley as one of the stations being prioritised for feasibility work on step-free access. On that basis, it would be particularly helpful to see the feasibility material that came of this process, even if the formal estimate is still being finalised.

Kind regards,

Christian Evans, MSc MRTPI | Senior Planner
Direct +44 (0) [REDACTED] | Mobile +44 [REDACTED] [REDACTED]
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Registered Office: 101 Park Drive, Milton Park, Abingdon, Oxfordshire, England, OX14 4RY



From: Kayley Smith <[REDACTED]>
Sent: 23 June 2026 23:22
To: Evans, Christian <[REDACTED]>
Cc: nick.banks <[REDACTED]> James Parker <[REDACTED]> AustinFell, Cameron

<[REDACTED]> owen.weaver <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments [Filed 24 Jun 2026 09:40]

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Hello all,

We are still confirming a formal cost estimate, but are very confident that the project will cost over £15m. This is based on costings from our tier 1 delivery partner who did the feasibility work for us and could continue it through to design and build if we are in a position to proceed.

Kind Regards,

Kayley Smith (she/her/hers)
Principal Area Planner (West and Out of London)
Spatial Planning | Customer and Strategy
Transport for London | 5 Endeavour Square, 8th floor | Palestra, 11th floor

From: Evans, Christian <[REDACTED]>
Sent: 23 June 2026 14:02
To: Kayley Smith <[REDACTED]>
Cc: nick.banks <[REDACTED]> James Parker <[REDACTED]> AustinFell, Cameron
<[REDACTED]> owen.weaver <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments
Importance: High

Hi Kayley

Further to Owen's emails below, I am conscious that this matter has now been outstanding for some time and that we are only a week away from the Inspector's 29 June deadline for confirming the matters in dispute within the Section 106 agreement.

At present, we do not have sufficient detail from TfL to understand how the circa £15m figure for step-free access at Croxley station has been calculated, or how the contribution sought from this appeal scheme has been apportioned. That information is needed urgently so that the parties can either agree the relevant obligation or, if agreement is not possible, clearly identify the point of dispute for the Inspector.

Please could you provide, as soon as possible, the basis for the £15m figure, including the scope of works assumed, any cost breakdown or supporting estimate, and the methodology TfL has applied in calculating the contribution expected from this development.

Given the Inspector's deadline, we would be grateful for a substantive response by return, or confirmation today of when this will be provided.

Kind regards

Christian Evans, MSc MRTPI | Senior Planner

Direct +44 (0) [REDACTED] | Mobile +44 [REDACTED] | [REDACTED]

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From: Owen Weaver <[REDACTED]>
Sent: 12 June 2026 12:20
To: 'Kayley Smith' <[REDACTED]>
Cc: nick.banks <[REDACTED]>, jparker <[REDACTED]>, AustinFell, Cameron <[REDACTED]>, Evans, Christian <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments [Filed 12 Jun 2026 12:39]

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Hi Kayley,

Please can you confirm that you will be providing us with some detail ahead of the 29th June deadline.

Kind regards,

Owen



From: Owen Weaver
Sent: 01 June 2026 16:39
To: 'Kayley Smith' <[REDACTED]>
Cc: Nick Banks <[REDACTED]>, James Parker <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

Hi Kayley,

Following on from our CMC, the inspector has given us a deadline to 29th June to confirm which matters are in dispute within the Section 106 agreement.

Would appreciate confirmation from yourself where the £15m figure for step-free access originated from, so that we can agree our Section 106 ahead of the inspectors deadline.

Owen

From: Owen Weaver
Sent: 29 May 2026 09:17
To: 'Kayley Smith' <[REDACTED]>

Cc: Nick Banks <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

Morning Kayley,

Have you had the opportunity to review the proposed contributions on our application?

We have our case management conference with the inspector on Monday and would appreciate an update before then even if it's just to say that you are reviewing this.

Owen

From: Owen Weaver
Sent: 18 May 2026 13:56
To: 'Kayley Smith' <[REDACTED]>
Cc: Nick Banks <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

Hi Kayley,

Thanks for coming back to me.

Yes, I wanted to check as we are heading towards a public inquiry in August and we want to be sure that all our proposed contributions meet the CIL test.

Our transport consultants raised the question as we hadn't been provided details of the scheme for step-free access at Croxley Green station. If you are able to provide how the £15m was calculated, that could inform the proposed contribution that we are making towards TfL.

Happy to discuss.

Owen

From: Kayley Smith <[REDACTED]>
Sent: 18 May 2026 13:45
To: Owen Weaver <[REDACTED]>
Cc: Nick Banks <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

Hiya Owen,

This would be me. Can I confirm that it is you who is querying whether the request meets the tests?

Kind Regards,

Kayley Smith (she/her/hers)
Principal Area Planner (West and Out of London)
Spatial Planning | Customer and Strategy
Transport for London | 5 Endeavour Square, 8th floor | Palestra, 11th floor

From: Owen Weaver <[REDACTED]>
Sent: 13 May 2026 09:50
To: Kayley Smith <[REDACTED]>
Cc: Nick Banks <[REDACTED]>
Subject: RE: Croxley Green 24/2073/OUT TfL Comments

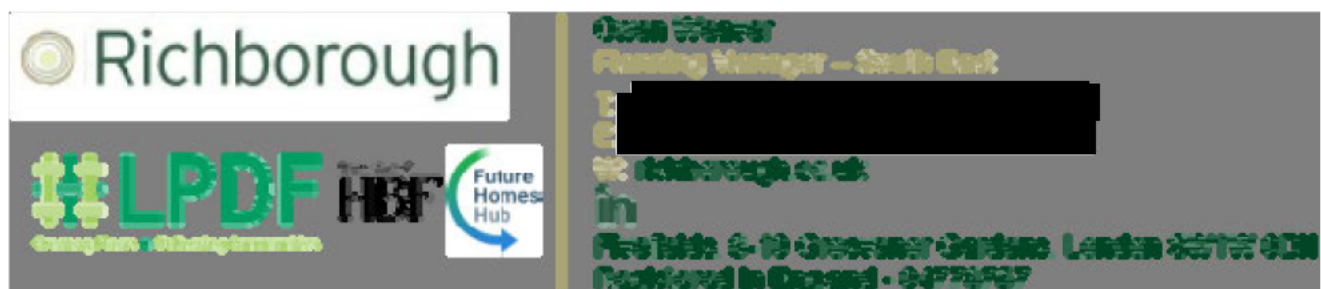
Hi Kayley,

The planning inspector has provided us with a deadline of 21st May to agree Section 106 contributions.

Please can you let me know who at TfL dealt with our application at Croxley Green?

We want to confirm that the circa £1m contribution to step-free access at Croxley Station would meet the legal tests under regulations.

Owen



From: Owen Weaver
Sent: 05 May 2026 10:19
To: Kayley Smith <[REDACTED]>
Cc: Nick Banks <[REDACTED]>
Subject: Croxley Green TfL Comments

Hi Kayley,

I hope you are well and had a nice bank holiday weekend!

You may recall towards the end of last year that we spoke about our application at Croxley Green to Three Rivers District Council under Reference 24/2073/OUT . See link to that application below - [24/2073/OUT | Outline Application: Development of up to 600 residential dwellings \(Use Class C3\(a\)\), construction of a 5-bedroom property for childrens social care and supported living \(Use Class C3\(b\)\). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school \(Use Class F1\(a\)\) \(plus expansion land for a two form entry primary school\). A mixed use local centre including provision for NHS health and social care services \(Use Class E\(e\)\), community building \(Use Class F2\), retail and cafe provision \(Use Class E\(a-c\)\), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. \(Layout, scale, appearance and landscape as reserved matters\). | Land To North Of Little Green Lane Croxley Green WD3 3SP](#)

The application has since been refused by Three Rivers planning committee and subsequently have submitted our appeal. Ahead of an inquiry, we wanted to confirm how the £15m step free access to Croxley Green station has been calculated by TfL.

The only commentary that we have from TfL via the case officer is below:

- *agree with the methodology presented using the census data. However, I think the rail and underground trips should be merged so the modal split would be 20 per cent rather than the 17 presented currently.*
- *Further evidence should be provided as to why it is considered that it will be a 50% exact split between the stations. From my analysis of the information submitted, the bus route would reach Croxley station first so it is likely that a higher percentage of trips would be via that station.*
- *The step free access scheme at Croxley is going to cost in the region of £15m. A contribution from this site will be sought once the above trip generation is finalised. The contribution would be commensurate with the size of this development.*

I've also attached the multi-modal split assessment that our transport consultants submitted and is referred to in the correspondence above.

When we spoke previously, you noted that you weren't dealing with this application but knew the colleague who was. Are you able to provide me with their contact details?

Kind regards,

Owen

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Appendix H3

TfL FOI Correspondence

FOI request detail

List of Tube Stations on TfL's Step-Free Access Consideration List

Request ID: FOI-0671-2526

Date published: 17 June 2025

You asked

I am writing to request the following information: 1. A full list of London Underground stations that are currently on Transport for London's secondary or "consideration" list for future step-free access upgrades. 2. For each station on this list, please include any available details, including: • The line(s) the station serves • Whether a feasibility study has been completed • Any projected cost estimates if available • Whether the station has been subject to third-party or borough funding offers 3. If such a list has been circulated internally or presented to the TfL Board, the Mayor of London, or GLA Assembly members, please provide a copy of that document (or documents), including any accompanying notes or appendices.

We answered

Our Ref: FOI-0671-2526

Thank you for your request received on 20 May 2025 asking for information about London Underground stations where we are considering step-free access.

Your request has been considered in accordance with the requirements of the Freedom of Information (FOI) Act and our information access policy. I can confirm that we hold some of the information you require. You asked for:



A full list of London Underground stations that are currently on Transport for London's secondary or "consideration" list for future step-free access upgrades.

2. For each station on this list, please include any available details, including:

- The line(s) the station serves
- Whether a feasibility study has been completed
- Any projected cost estimates if available
- Whether the station has been subject to third-party or borough funding offers

The Mayor set an ambitious target for 50 per cent of the London Underground network to be step-free by 2030. This aligns with the long-term goal set out in the Mayor's Transport Strategy to make the majority of the tube network step-free.

To support the Mayor's target we plan to expand the scope of our programme further, starting feasibility on a further 15 stations this financial year.

A longlist of 30 stations has been prioritised and will be shortlisted to 15 stations by October 2025. The list of 30 stations is outlined below with the additional information requested regarding previous feasibility studies. We currently do not have any cost estimates for stations, or any third-party funding secured at present.

Station	Line(s) served	Feasibility study (year completed)
Barkingside	Central	No
Becontree	District	No
Blackhorse Road	Victoria	No
Brent Cross	Northern	Yes (2015)
Canons Park	Jubilee	Yes (2017)
Chigwell	Central	Yes (2017 – draft only)
Dagenham East	District	No
East Putney	District	Yes (2019)
Edgware Road (C&D)	Circle, District, Hammersmith & City	Yes (2025)
Grange Hill	Central	Yes (2005 – pre-feasibility only)
Hatton Cross	Piccadilly	No
Hornchurch	District	No
Kentish Town	Northern	Yes (2006)
Moor Park	Metropolitan	No
Northwood Hills	Metropolitan	No
Plaistow	District, Hammersmith & City	Yes (2017)

Preston Road	Metropolitan	Yes (2017)
Putney Bridge	District	Yes (2017)
Queensbury	Jubilee	Yes (2017)
Rickmansworth	Metropolitan	Yes (2017)
Ruislip	Metropolitan, Piccadilly	Yes (2017)
Ruislip Manor	Metropolitan, Piccadilly	No
Snaresbrook	Central	Yes (2017)
South Harrow	Piccadilly	Yes (2017)
South Ruislip	Central	Yes (2005 – pre-feasibility only)
Theydon Bois	Central	Yes (2018)
Totteridge & Whetstone	Northern	Yes (2017 – draft only)
Upton Park	District, Hammersmith & City	Yes (2017 – draft only)
Willesden Green	Jubilee	Yes (2005)
Wood Green	Piccadilly	No

3. If such a list has been circulated internally or presented to the TfL Board, the Mayor of London, or GLA Assembly members, please provide a copy of that document (or documents), including any accompanying notes or appendices.

In accordance with the FOI Act, we are not obliged to supply the requested information as it is subject to a statutory exemption to the right of access to information under section 22 of the Act. In this instance the exemption has been applied as the information you have requested is intended for future publication. A document outlining the prioritisation process of the 30 stations will be released in coming months.

This exemption is subject to a public interest test, which requires us to assess whether the public interest in applying the exemption outweighs the public interest in disclosure. In this instance, it is considered that the public interest favours the publication of this information, in context and according to the pre-determined schedule, rather than in response to your request, to ensure the information is provided accurately and in an accessible manner.

If this is not the information you are looking for please do not hesitate to contact me.

Please see the attached information sheet for details of your right to appeal.

Yours sincerely

Gemma Jacob

Senior FOI Case Officer
FOI Case Management Team
General Counsel
Transport for London

[Back to top](#)

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