

Sustainable Transport, Walking and Cycling London Plan Guidance

Consultation summary report

October 2022

Copyright

Greater London Authority

October 2022

For more information about this document, please contact:

The London Plan Team, GLA Planning

Greater London Authority

City Hall

Kamal Chunchie Way

London E16 1ZE

www.london.gov.uk

Tel 020 7983 4000

Email planningsupport@london.gov.uk

Other formats

If you require this document in a more accessible format, please get in touch via our [https://www.london.gov.uk/contact-us-formonline form](https://www.london.gov.uk/contact-us-formonline-form) and tell us which format you need.

<https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance>

Table of contents

1.	Introduction	4
2.	Who took part?.....	4
3.	Consultation feedback and GLA response.....	5
4.	Other themes raised during engagement.....	15
5.	Equality impacts.....	15
6.	Next steps and monitoring	16

1. Introduction

Between 30 September and 20 December 2021, the GLA carried out a consultation on the Mayor's draft Sustainable Transport, Walking and Cycling London Plan guidance (LPG). This LPG has been put together to provide guidance on London Plan Policy T3, 'Transport Capacity, Connectivity and Safeguarding'. It also supports delivery of T2 'Healthy Streets' and T1 'Strategic Approach to Transport', which indirectly delivers against a range of other London Plan policies, e.g. Policy SI 1 'Improving Air Quality'.

Due to the Covid-19 pandemic, the consultation was held entirely online, with a dedicated consultation portal page hosted on the GLA's consultation platform and a webpage on the GLA's website. This gave Londoners the opportunity to comment through an online form as well as by email, and a postal address was also provided. In addition, four online events were held through the consultation period for Londoners and stakeholders to learn more about the document and ask questions.

In total, there were 43 responses to the consultation. This document provides a summary of these consultation responses received. The Mayor would like to thank everyone who took part for engaging with the guidance.

2. Who took part?

Through the consultation period there were 215 attendees to virtual events; 2,151 page views; and 43 consultation responses (33 sent through the dedicated consultation survey, and 10 sent directly via email). The information around who took part is taken from information submitted alongside consultation responses. Other than information around the number of attendees and views, there is no detailed background data available about virtual event attendees and page views. Therefore, the data around who took part represents a small sample of those we engaged with; it may not reflect the true breadth of engagement.

Respondents were asked whether they were responding as an individual; and, if not, what type of organisation they represented. The respondent types are broken down in the table below:

Respondent type	Number	Percentage
Individual	14	33%
Business	6	14%
Campaign group	8	19%
Community group	4	9%
Government body or agency	4	9%

Respondent type	Number	Percentage
London borough	7	16%
Total	43	100%



Responses were received from three organisations that referred to representing a protected characteristic group. These were Hackney-based Disability BackUp; Mums for Lungs; and the Guide Dogs for the Blind Association.

3. Consultation feedback and GLA response

As part of the consultation on the draft guidance, respondents who engaged with the document through the GLA's online consultation portal were asked to submit responses to specific questions. There were up to 31 responses to each of the questions that were included in the survey, with most respondents supporting the approach taken in the draft Sustainable Transport, Walking and Cycling LPG. This section provides an analysis of the responses received through the online consultation survey. Following this, section 4 sets out additional themes from direct consultation responses received during the consultation period.

Q1. DEVELOPMENT PROPOSALS: To what extent do you agree or disagree with the following sentence: The guidance provides helpful information on how to apply London Plan Policy T3 (transport capacity, connectivity and safeguarding) to development proposals.

This question was answered by 31 respondents, of whom 27 either somewhat or definitely agreed with the statement. Only one respondent disagreed, and three neither agreed nor disagreed.

Response	Number	Percentage
Definitely agree	10	32%
Somewhat agree	17	55%
Neither agree nor disagree	3	10%
Somewhat disagree	–	–
Definitely disagree	1	3%
Total	31	100%

Q2. GENERAL: We would like to know your views on the overall approach set out in the draft guidance. To what extent do you agree or disagree with the following sentence: The guidance clearly sets out tools for the protection and further development of London’s transport network to support London’s development and encourage improvement in networks supporting active travel choices for local plans and new development.

Most responses to this question were positive, with 16 respondents somewhat agreeing and seven definitely agreeing. Only one respondent definitely disagreed and three somewhat disagreed; four neither agreed nor disagreed.

Response	Number	Percentage
Definitely agree	7	22%
Somewhat agree	16	52%
Neither agree nor disagree	4	13%
Somewhat disagree	3	10%
Definitely disagree	1	3%
Total	31	100%

Q3. SAFEGUARDING LAND FOR TRANSPORT INFRASTRUCTURE: To what extent do you agree or disagree with the following sentence: The definition of safeguarding in the guidance is clear and sets out an approach that can easily be applied.

Only one respondent disagreed with this sentence. The majority agreed, with 23 either definitely or somewhat agreeing. Seven respondents neither agreed nor disagreed.

Response	Number	Percentage
Definitely agree	8	26%
Somewhat agree	15	48%
Neither agree nor disagree	7	23%
Somewhat disagree	–	–
Definitely disagree	1	3%
Total	31	100%

Q4. SAFEGUARDING LAND FOR TRANSPORT INFRASTRUCTURE: Please tell us if you have any comments on the approach to safeguarding in this guidance.

There were 15 responses to this question, with most respondents supportive of the safeguarding of land. Respondents suggested the following:

- Safeguarding of land for transport infrastructure should be considered at all scales, with interim uses also considered; walking, cycling and public transport prioritised over other uses; and requirements included for the enhancement of this infrastructure.
- Mobility hubs should be considered within this guidance.
- The challenges that are faced around climate change should be addressed in this document.

GLA response

Policy T3 of the London Plan and the Sustainable Transport, Walking and Cycling London Plan guidance can be applicable **at any scale** where it would be appropriate to safeguard land or buildings to support existing and future transport requirements. The guidance sets out that both local planning authorities (LPAs) (through their plan-making powers) and new developments should **ensure that appropriate land is safeguarded to support the networks and capacity within their areas**. In certain cases, such as in relation to route alignments for cycle networks or additional local connections for walking, these might be small areas of land; or, in meeting the needs of larger pieces of transport infrastructure, such as servicing buses, they may be much larger. Through the safeguarding of land and the protection of existing infrastructure, this guidance provides the opportunity for enhancement. Specific requirements for enhancement are outside the scope of this document, which is focused on safeguarding.

The Sustainable Transport, Walking and Cycling London Plan guidance is focused on providing further guidance on policy set out in London Plan policy T3 around safeguarding land for transport. This document provides guidance to support local planning authorities in identifying the need for safeguarding land for transport as part of their statutory plan making, this **does not exclude the potential for safeguarding land for mobility hubs**.

This guidance supports the Mayor's target for 80 per cent of journeys in London to be made through walking, cycling and on public transport (set out in London Plan Policy T1). This target is a **key component of the city's approach to tackling climate change**. It does this by providing further supporting information on London Plan safeguarding policy; and giving LPAs and developers further clarity and tools to ensure that there is the appropriate land to further develop London's public transport and active travel infrastructure.

This guidance also **supports the delivery of other policies in the London Plan, most notably T2 Healthy Streets and T1 Strategic Approach to Transport** as well as supporting wider policy objections (e.g. SI 1 Improving Air Quality). The link with these policies has been made clearer.

Q5. WALKING AND CYCLING: To what extent do you agree or disagree with the following sentence: The guidance sets out clear requirements for development plans and planning applications on how to improve walking routes.

Sixteen respondents somewhat agreed with the sentence, and eight definitely agreed. Three respondents definitely disagreed, and four neither agreed nor disagreed.

Response	Number	Percentage
Definitely agree	8	26%
Somewhat agree	16	51%
Neither agree nor disagree	4	13%
Somewhat disagree	–	–
Definitely disagree	3	10%
Total	31	100%

Q6. WALKING AND CYCLING: To what extent do you agree or disagree with the following sentence: The guidance sets out clear requirements for

development plans and planning applications on how to improve cycling infrastructure.

Fourteen respondents somewhat agreed with the sentence, with eight definitely agreeing. Three respondents definitely disagreed and four neither agreed nor disagreed.

Response	Number	Percentage
Definitely agree	8	27%
Somewhat agree	14	47%
Neither agree nor disagree	4	13%
Somewhat disagree	1	3%
Definitely disagree	3	10%
Total	30	100%

Q7. WALKING AND CYCLING: Please tell us if you have any comments on the approach to walking and cycling in this guidance.

There were 23 responses to this question, which were broadly supportive of the need to safeguard land for walking and cycling. Respondents suggested the following:

- The guidance does not reflect areas of conflict, or potential safety concerns among different users of public transport and modes of active travel, as well as private vehicles, in areas where they must share the same infrastructure.
- There should be encouragement to open existing infrastructure that is not currently in use, such as towpaths.
- The guidance should emphasise the importance of accessibility and inclusion.
- There were concerns around the requirements for and design of cycle parking.

GLA response

Demand for different transport modes in London is influenced by several different factors, but pressures on public transport and active travel networks can lead to areas of conflict. London Plan policy T3 is focused on safeguarding land for transport, to support the continued development of London's transport networks. This document provides further clarity on this policy; and supports LPAs and developments in the process of identifying land and safeguarding it for future transport development that will continue to meet London's needs. Through the process of **safeguarding** and developing **additional transport and active travel capacity**, this guidance should **help in reducing the pressures on these networks and relieving areas of conflict** between different modes.

London Plan policy T3 and guidance includes detail around the safeguarding of **existing infrastructure**, all of which **is therefore safeguarded by this policy – regardless of whether it is currently in use**. Table 10.1 of the London Plan sets out a list of transport schemes. London Plan policy and guidance is supportive of the reopening of routes, with a range of supporting policy and documents, both existing and in development, that provide information around delivery including how improvements and enhancements to routes and networks can be made, including the London Cycling Design Standards developed by TfL.

The guidance is being **amended to include stronger wording around accessibility**, and to ensure that areas such as **step-free access** are included when identifying the amount of land required to safeguard for future transport infrastructure.

The London Plan sets out requirements in relation to cycle parking, with further information around design standards set out in the London Cycling Design Standards. The **purpose of this guidance is to provide further detail on policy T3** of the London Plan relating to the safeguarding of land for transport; design requirements are outside the scope of this document.

Q8. BUSES: To what extent do you agree or disagree with the following sentence: The guidance provides effective mechanisms to safeguard and support bus infrastructure.

Out of 31 respondents, nine neither agreed nor disagreed. The majority either somewhat agreed or definitely agreed; one respondent somewhat disagreed; and two respondents definitely disagreed.

Response	Number	Percentage
Definitely agree	6	19%
Somewhat agree	13	42%
Neither agree nor disagree	9	29%
Somewhat disagree	1	3%
Definitely disagree	2	7%
Total	31	100%

Q9. BUSES: Please tell us if you have any comments on the approach to buses in this guidance.

There were 13 responses to this question. Respondents suggested the following:

- EV charging is an important consideration when thinking about safeguarding, as buses are changing over to electric.
- There were concerns around accessibility in relation to both bus infrastructure and bus information.
- Buses are a popular form of transport, but there are concerns around routes being cut; buses coming into conflict with other forms of transport, such as cyclists; and the impact of heavy traffic on services.
- The safeguarding should be extended to all digital demand-responsive (DDRT, or on-demand) services; and more information should be included in relation to river bus services.

GLA response

The Mayor recognises the importance of EV charging, which is why he set up the EV Infrastructure Taskforce to tackle the challenges of delivering infrastructure. The Taskforce produced a delivery plan for charging infrastructure up to 2025. London has the largest fleet of electric buses of any European city, including routes such as the 63. The Sustainable Transport, Walking and Cycling guidance document sets out the approach that LPAs and developments should take to safeguarding land for current and future transport infrastructure needs. The **detailed requirements around EV charging are outside the scope of this document**. This guidance should be applied to reflect the land requirements of such infrastructure where it is necessary to support bus infrastructure development. TfL is currently in the process of developing an EV charging strategy, which will feed into the process of identifying land for safeguarding.

There is the opportunity to strengthen wording to reflect the need for safeguarded land to support greater accessibility of sustainable transport options, including public transport and buses. **Additional wording has been added to strengthen the importance of accessibility and safety** within the guidance document.

The guidance focuses on safeguarding land for transport needs, setting out how LPAs should identify land to serve current and future needs. The **continued safeguarding** of land to enable the further development of networks **should reduce the levels of conflict experienced by different transport users** and those who have chosen active travel modes. The **volume and frequency of services are outside the scope of this document**. The LPG sets out the need to plan for future growth and the impact that development will have on the bus network. It should be noted that whilst demand may fluctuate on the network, the process of development will impact on services as well as wider population pressures in the time that it might take a development to come forward.

The section on buses **includes requirements that should be applied to river bus services**. However, **DDRT services have not been included** within this document as they fall outside its scope.

Q10. RAIL AND TRAMS: To what extent do you agree or disagree with the following sentence: The guidance provides effective mechanisms to safeguard and support rail and tram infrastructure.

Most respondents agreed with this sentence, with 12 somewhat agreeing and six definitely agreeing. Nine respondents neither agreed or disagreed with the sentence, and only two definitely disagreed.

Response	Number	Percentage
Definitely agree	6	21%
Somewhat agree	12	41%
Neither agree nor disagree	9	31%
Somewhat disagree	–	–
Definitely disagree	2	7%
Total	29	100%

Q11. RAIL AND TRAMS: Please tell us if you have any comments on the approach to rail and trams in this guidance.

This question received 10 responses. Respondents suggested the following:

- Rail and tram infrastructure needs to be closely linked or co-located with buses and active travel infrastructure.
- Enhancement and accessibility should be considered when deciding what land needs to be safeguarded.

GLA response

London Plan policy T1 sets out the need for a **strategic approach to transport**; and within the supporting text, sets out the **need for high-quality interchanges**. London Plan policy supports the co-location of different modes of transport and sets out the benefits of interchanges between different modes. The Healthy Streets Approach and guidance developed by TfL provides further supporting information and design guidance around how this can be achieved. This policy and guidance feeds into the approach that LPAs and developments should take as **rail and tram infrastructure needs to be closely linked or co-located with buses and active travel infrastructure**. This guidance supports the need for high-quality interchanges, by providing further detail as to how LPAs and developers should implement policy T3 of the London Plan and safeguard land for London's transport needs, covering both existing infrastructure and future requirements.

Following the consultation, further work is being undertaken to ensure that the guidance **reflects the need for accessibility** requirements to be considered when land is being safeguarded.

Q12. CAR PARKS AND OTHER SURPLUS TRANSPORT LAND: To what extent do you agree with or disagree with the following sentence: The guidance sets out clear requirements in relation to car parks and other surplus transport land.

Most respondents agreed with this sentence, with 13 somewhat agreeing and five definitely agreeing. Nine respondents neither agreed or disagreed with the sentence, and only two definitely disagreed.

Response	Number	Percentage
Definitely agree	5	17%
Somewhat agree	13	45%
Neither agree nor disagree	9	31%
Somewhat disagree	1	3.5%
Definitely disagree	1	3.5%
Total	29	100%

Q13. CAR PARKS AND OTHER SURPLUS TRANSPORT LAND: Please tell us if you have any comments on the approach to car parks and other surplus transport land in this guidance.

This question received 16 responses. Respondents suggested the following:

- Car usage and car parking should be reduced, and the sites converted to other uses including development of affordable housing and other infrastructure such as cycle parking.
- There is still a need for car parking. Those who choose to drive will continue to do so and find other, less suitable solutions to parking.
- Disabled parking bays continue to be important in supporting mobility.

GLA response

The guidance provides further detail and **clarity** in relation to **land that is currently used for parking that may be released for other uses**. This includes housing, especially where these sites have good access to public transport. The guidance

sets out how London Plan policy T3 relates to policies H1, 'Increasing housing supply', and H2, 'Small sites'.

Further guidance is being developed in relation to London Plan policy T6, 'Parking', and will provide further detail and clarity in due course.

Q14. GENERAL: Do you have any further comments to make on the guidance?

This question received 15 responses, with most respondents supportive of the guidance, especially in relation to the prioritisation of public transport and active travel within this document. Respondents suggested that the document needs to make more references to other guidance, such as design and accessibility guidance, and set out how it relates to other GLA and TfL documents.

Theme	Number	Percentage
Supportive of guidance and prioritisation of public transport and active travel.	7	47%
Reference to other guidance and relationship with other documents.	4	27%

GLA response

The scope of this guidance is focused on providing further supporting information around how to implement London Plan Policy T3, as well as London Plan Policies T1 and T2 with an emphasis on the requirements around safeguarding land for transport. There is the opportunity to include more references to related guidance and documents which provide further information on the design and delivery of sustainable transport and active travel infrastructure. Some design guidance relating to accessibility and space requirements may be relevant in helping to clarify how much land needs to be safeguarded for different types of transport and active travel infrastructure. It may also be helpful to include reference to the transport hierarchy to reflect the importance of safeguarding different types of travel infrastructure.

4. Other themes raised during engagement

In addition to the 33 responses received through the consultation portal, 10 were received directly during the consultation period via email. The responses set out above, in section 3, were generally supportive of the guidance and set out how important London's public transport and active travel networks are. These responses highlighted the need for increased emphasis on accessibility; they also demonstrate the continuing evolution of thinking about transport in London, with references to mobility hubs and integration of services. The responses received directly during the consultation period continue to reinforce these themes of safety, accessibility and integration, with two further themes identified and set out below:

- This document does nothing to prevent induced demand.
- This guidance should make more reference to other related documents and guidance for it to be easier for those using it to understand how this document fits within wider policy and guidance.

GLA response

The Sustainable Transport, Walking and Cycling London Plan guidance provides further detail around the application of policy T3 of the London Plan, as well as London Plan policies T1 and T2. This guidance forms part of a wider group of documents that fall under the London Plan, including the Mayor's Transport Strategy. When combined, these documents are aimed at delivering a modal shift target of 80 per cent of journeys in London to be made through active travel or by public transport by 2041. The scope of this document is to provide a guide around the safeguarding of land. The **topic of induced demand is outside the scope of this particular document.**

The feedback in relation to referencing other related documents within the guidance is being considered further, with a review of documents that may be relevant to support the appropriate safeguarding of land. This includes making reference to Local Traffic Note 1/20. This guidance does support the delivery of other policies in the London Plan, most notably T2 Healthy Streets, T1 Strategic Approach to Transport. Other policies are also relevant, e.g. SI 1 Improving Air Quality. The link with these policies has been made clearer.

5. Equality impacts

Respondents raised the following potential equality impacts arising in relation to the draft guidance:

- Walking, cycling and public transport must be prioritised over other vehicles to prevent exacerbating inequality.
- Older people, and those with reduced mobility who use micro-mobility aids, are impacted by the quality of walking routes, especially pavement surfaces, and the safety of these routes.

- Whilst safety is mentioned, the guidance does not explicitly relate to any specific groups – it does not cover, for instance, the specific requirements and needs that disabled users may have, or concerns for women using these networks.
- The need for wording that reflected transport and active travel networks being accessible for all was highlighted, especially ensuring that cycle infrastructure was accessible to all groups and supporting different groups to cycle more.

GLA response

The impacts of transport and private vehicle use are well documented, from health and wellbeing to socio-economic impacts. The London Plan and the Mayor's Transport Strategy, amongst other documents, support the delivery of a more **sustainable and equitable city**. As part of this, policy has been increasingly focused on improving **access to public transport and active travel modes**, supporting the Mayor's target of 80 per cent of all journeys in London being made through public transport and active travel by 2041. The sustainable transport hierarchy reinforces this; and supporting policy, such as the Healthy Streets Approach, is in place to ensure that public realm and active travel networks support and **encourage people to make more sustainable choices**.

The Sustainable Transport, Walking and Cycling guidance provides supporting information and detail around the application of London Plan policy T3, 'Transport capacity, connectivity and safeguarding'. **Therefore, the scope of this document is focused on safeguarding land for transport and active travel.** It does however also support the delivery of other policies in the London Plan, most notably T2, Healthy Streets and T1 Strategic Approach to Transport. The link with these policies has been made clearer. **Other policy, design and guidance documents, and further London Plan guidance, which is currently being developed, provide information around the design and quality requirements of places and infrastructure.** It is important that when identifying land to safeguard for transport that it is safe and accessible for all future users of this infrastructure. There is a range of policy and design guidance that sets out standards to ensure that from when the transport infrastructure is initially identified and through the process of design, the needs of all users are considered and integrated into the design.

6. Next steps and monitoring

The consultation took place in 2021, during the coronavirus pandemic, when there were varying restrictions in place over this period. It was therefore held online, with virtual meetings and different ways of responding publicised through the GLA's online platforms. Following the consultation and analysis of responses, the Sustainable Transport, Walking and Cycling London Plan guidance will be updated to reflect the points raised as part of this process. An updated document will then be approved by the Mayor, and it is expected that this document will be adopted in summer 2022.

Following the adoption of the London Plan in 2021, a consultation was undertaken on a new framework for the Annual Monitoring Report (AMR). The consultation has concluded, and the **new AMR framework has now been published**. Where data is held by the GLA, the KPIs will be reported against as soon as possible, from March 2023. Where possible KPIs will be reported on monthly. A number of the KPIs rely on data provided by external parties, many of which do not have the capability to provide data in real time as such they will be reported as soon as they become available. Monitoring of this guidance will fall under the monitoring of the London Plan policy T3, under which this guidance sits. There are some key indicators that will show the degree to which implementation of this guidance by local authorities and developments has been successful; whether there is the land available for the identified transport needs in the first instance; and where boroughs have put in place the requirements around mapping future infrastructure need and networks.

