

1. CBT is an established pressure group campaigning for sustainable transport.
2. The broad thrust of these comments was agreed at a meeting of the CBT London group and subsequently refined in e-mail correspondence with participating members,
3. CBT London welcomes the new London Plan, with its emphasis on Good Growth, a healthy inclusive city and its determination to limit unsustainable modes of transport. Where we are critical, it is largely through concern that in places the plan needs to be more robust if its aims and objectives are to be met.
4. We welcome the policy of encouraging densification around major transport interchange points (policy GG2). However, for this to succeed, both the trains and buses, and the platforms at which the former arrive, must have sufficient capacity at peak times to accommodate increased use. This should be the primary focus of new infrastructure, rather than development potential of places further from zone 1, and often beyond the GLA boundary. We wish to see policies GG2 and T3 amended to address this point.
5. Good growth will not be achieved by a "predict and provide" approach to infrastructure. The Plan needs explicitly to state, as its predecessors have done, the aim of reducing the need to travel. By this we do not mean restricting choice, but rather enabling people to live closer to their place of work (which many of the housing and economy policies address; as does paragraph 10.1.1 in its reference to the integration of land and transport), and reducing distances travelled in other ways: new rail infrastructure providing direct links not currently available, improving orbital links to obviate the need to travel into and out of central London. We wish to see policies GG2 E and T3 strengthened in this way.
6. We consider that the omission of Air Quality from policy GG3 is an oversight and wish to see the policy amended by an additional clause H. This should be cross referenced with policy T2.
7. We strongly support policies SD6-SD10 inclusive on Town Centres. Not only are Town Centres good in themselves for raising the quality of life, their continued prosperity is key to delivering the aims of improving air quality and increasing the share of modally sustainable means of transport to 80%. If encouraging people to walk for 20 minutes a day is important, and it is, how much more should we incentivise those who are able to do so to carry their own shopping rather than ordering on line and promulgating an inexorable growth in white van deliveries alongside a decline in Town Centres. The Plan needs to include proposals for such incentives.
8. The car parking standards for outer London (policies T6.1, T6.2 and T6.3) seem unnecessarily generous and difficult to reconcile with the welcome objective of increasing to 80% the proportion of journeys to be made by sustainable modes of transport. In particular, we cannot envisage any circumstances in which the provision of more than one space per residential unit could be justified.
9. Level 5 CAVs (driverless cars) may or may not become commonplace in the lifetime of this plan. To guard against the possibility of such vehicles coming into use and undermining the modal shift to the most sustainable means, the Plan should address and confine the parking of such vehicles.
10. Conversely, the minimum cycle parking standards (Policy T5 and Table 10.2) are insufficient to drive "the ambitious aim to reduce Londoners' dependency on cars".
11. The healthy street should be devoid of unnecessary clutter, which impedes walking as a means of getting from A to B, and is of particular concern to several disability groups. The policy T2 of making the street a pleasant environment to visit needs to temper the enthusiasm for items of interest (Things to see and do) with an acknowledgement of the need to maintain clear lines of travel.
12. CBT London welcomes the Mayor's stance on Heathrow (policy T8D). We are opposed to any expansion of airport capacity in the south-east and believe that all journeys over land should be made by rail rather than air.

Andrew Bosj, Vice-Chair

I don't want to see more generous provision for CAVs (compared with non-autonomous cars) on the grounds that they might be for shared use. Andrew
x

-----Original Message-----

From: Chris Barker [REDACTED]
To: 'Andrew Bosi' [REDACTED] londonplan <londonplan@london.gov.uk>
CC: vreadhead [REDACTED]
Sent: Wed, 14 Feb 2018 9:58
Subject: RE: Response to the Draft London Plan from CBT London

Thanks Andrew. I will circulate it with the minutes. Maybe it's too late to comment but I don't understand your remark about having to confine the parking of AVs but I'm not sure how the London Plan could prepare for them.

Chris

From: Andrew Bosi [REDACTED]
Sent: 13 February 2018 20:10
To: londonplan@london.gov.uk
Cc: [REDACTED]
Subject: Response to the Draft London Plan from CBT London

I have pleasure in attaching our response. For the avoidance of doubt, we have no objection to our comments being made public.

Andrew Bosi,
Vice-Chair