Living Streets response to the Draft London Plan

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About Living Streets

We are Living Streets, the UK charity for everyday walking. We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illnesses and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone. Our ambition is to enable people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking

Summary

- Living Streets broadly support the draft new London Plan and strongly support the embedding and linking of transport, health and environment policy.

- We strongly support the Healthy Streets approach as a way of delivering better streets for everyone in London.

- We strongly support the 'good growth' vision that will focus new development in areas with good existing or planned public transport, walking and cycling accessibility.

- We support 'car-free' parking standards in areas of London with high levels of public transport access.

- We are strongly opposed to additional highway capacity as part of the plan at Silvertown, Gallions and Belvedere and expect to see infrastructure that enables active travel

Consultation response

Chapter 1: Planning London's Future (Good Growth Policies)

Policy GG1 Building strong and inclusive communities

We support policy GG1 and strongly support "C. ensure that streets and public spaces are planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging and community ownership, and where communities can develop and flourish."

Policy GG2 Making the best use of land

We support policy GG2 and strongly support 1.2.3 "They are places where local amenities are within walking and cycling distance, and public transport options are available for longer trips, supporting good health, allowing strong communities to develop, and boosting the success of local businesses".

Encouraging intensification of density and not sprawl helps create walkable neighbourhoods where more journeys, and stages of journeys, are possible on foot.

We also strongly support "E. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth".

Policy GG3 Creating a healthy city

We support policy GG3 and strongly support the following:

- "A ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities"

- "B promote more active and healthy lifestyles for all Londoners and enable them to make healthy choices"

- "C use the Healthy Streets Approach to prioritise health in all planning decisions".

Policy GG5 Growing a good economy

We support policy GG3 and strongly support "G maximise London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity". We support new development that allows trips between home, work, school and shops to be completed on foot.

Policy GG6 Increasing efficiency and resilience

We support policy GG6 and the plan to make London a zero carbon city by 2050. To achieve this target, significant mode shift to walking and cycling must be encouraged and enabled.

Chapter 2: Spatial Development Patterns

Policy SD1 Opportunity Areas

We strongly support "2.1.10 The Mayor's Transport Strategy seeks to ensure that dedicated public transport and walking and cycling provision are at the heart of planning for Opportunity Areas. It sets out that the Mayor will support growth in Opportunity Areas through transport investment and planning, and sets ambitious mode share targets".

Policy SD4 The Central Activities Zone (CAZ)

We support "H. The attractiveness of the CAZ to residents, visitors and businesses should be enhanced through public realm improvements and the reduction of traffic dominance, as part of the Healthy Streets Approach (see Policy T2 Healthy Streets)".

Policy SD6 Town centres

We support the following:

"3. the structure for delivering sustainable access by walking, cycling and public transport to a competitive range of services and activities"

"6. a key mechanism for building sustainable, healthy, walkable neighbourhoods with the Healthy Streets Approach embedded in their development and management"

"C. The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport. Residential-only schemes in town centres may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and the diverse range of uses required to make a town centre vibrant and viable".

Policy SD7 Town centre network

We support "F. Local and neighbourhood centres should focus on providing convenient and attractive access by walking and cycling to local goods and services needed on a day-to-day basis".

Policy SD8 Town centres: development principles and Development Plan Documents

We support policy SD8.

Policy SD9 Town centres: Local partnerships and implementation

We strongly support the requirement for town centre strategies that include Healthy Streets, transport strategy, highways management and air quality.

Chapter 3: Design

Policy D1 London's form and characteristics

We support policy D1 and strongly support "8. encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area".

Policy D2 Delivering good design

We strong support the requirement for boroughs to evaluate transport networks, including walking and cycling networks, in preparing Development Plans and Area Based Strategies.

Policy D3 Inclusive design

We support policy D3, the Inclusive Design policy.

Policy D6 Optimising housing density

We support the requirement that consideration be given to sites' connectivity by walking and cycling when determining the optimum density and urge Transport for London / GLA to develop a tool to support this process.

Policy D7 Public realm

We support the policy statement setting out the requirements of the design of the public realm. We support the definition of the public realm and strongly support the link to Healthy Streets approach.

Chapter 4: Housing

Policy H1 Increasing housing supply

We support "boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary". We support new development located a short walk from public transport stations and stops.

Chapter 5: Social Infrastructure

Policy S1 Developing London's social infrastructure

We support "E. New facilities should be easily accessible by public transport, cycling and walking".

Policy S3 Education and childcare facilities

We support "2. locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling

3. locate entrances and playgrounds away from busy roads, with traffic calming at entrances

4. link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to encourage walking and cycling"

Policy S4 Play and informal recreation

We support policy S4. We strongly support 5.4.2 and 5.4.3.

Policy S6 Public toilets

We support policy S6.

Chapter 6: Economy

Policy E1 Offices

We strongly support "D. The diverse office markets in outer and inner London (outside the CAZ and NIOD) should be consolidated and - where viable - extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity"

Policy E4 Land for industry, logistics and services to support London's economic function

We strongly support "E. Any release of industrial capacity in line with part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure"

Chapter 7: Heritage and Culture

No response

Chapter 8: Green Infrastructure and Natural Environment

Policy G3 Metropolitan Open Land

We support policy G3.

Policy G4 Local green and open space

We strongly support the public open space categorisation including pocket parks and linear spaces.

Policy G5 Urban greening

We support policy G5.

Policy G7 Trees and woodlands

We support policy G7.

Chapter 9: Sustainable Infrastructure

Policy SI1 Improving air quality

We strongly support policy SI1.

Policy SI2 Minimising greenhouse gas emissions

This policy should cross-reference Chapter 10: Transport policies to demonstrate the important role that parking restriction and traffic reduction has in delivering these policy outcomes.

Policy SI6 Digital connectivity infrastructure

Chapter 10: Transport

Policy T1 Strategic approach to transport

We support policy T1.

We do not support and strongly oppose the inclusion in table 10.1 of Silvertown tunnel and further road river crossings at Gallions Reach and Belvedere.

Policy T2 Healthy Streets

We strongly support the Healthy Streets Approach as a way of delivering better streets for everyone in London.

We strongly support the Healthy Streets indicators being applied to new developments to ensure they are being designed to support this policy.

Policy T3 Transport capacity, connectivity and safeguarding

We support policy T3.

We strongly support safeguarding of the Walk London Network and Thames Path.

Policy T4 Assessing and mitigating transport impacts

We support policy T4.

We strongly support embedding the Healthy Streets Approach in transport assessments.

Policy T5 Cycling

We strongly support policy T5. Provision of adequate good quality cycle storage is essential to ensure the footway remains free of obstructions. Space for cycle storage should, in the first instance, be allocated from road space, rather than the footway. Where cycle storage is located on the footway it must not obstruct key walking routes along the footway, especially those used by vulnerable pedestrians.

Policy T6 Car parking

We support policy T6 and strongly support "A. Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. B. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite')."

Policy T6.1 Residential parking

We support policy T6.1 and strongly support car free residential parking standards in the Central Activities Zone and other centres where we would expect to see journeys completed on foot.

Policy T6.2 Office parking

We support policy T6.2 and strongly support car free office parking standards in the Central Activities Zone and Inner London where we would expect to see journeys completed on foot.

We strongly support "D - recognising the major negative impacts that would accompany more generous standards in Outer London and the requirement for suitable justification".

Policy T6.3 Retail parking

We support policy T6.3 and strongly support car free retail parking standards in the Central Activities Zone and all areas of PTAL 5-6 where we would expect to see journeys completed on foot.

Policy T7 Freight and servicing

We support policy T7, and we would expect it to include TfL's 'Direct Vision Standard' and reference the developing Star Rating scheme and HGV Safety Standard Permit Scheme.

Policy T9 Funding transport infrastructure through planning

We support policy T9. We support a significant programme of reallocation of road space away from motorised vehicles to walking and cycling. Significant investment will be required to achieve this and we support the commitment to explore land value capture mechanisms.

Chapter 11: Funding the London Plan

Infrastructure - 11.1.33

We strongly support the commitment to explore new ways of charging for London's roads. We expect to see comprehensive road pricing brought forward as soon as possible, with differential pricing for the most polluting vehicles.

Chapter 12: Monitoring

Table 12.1 – Key Performance Indicators and Measures

We strongly support the following proposed KPIs and measures:

- Transport - Modal share - Increasing mode share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041.

- Health - Londoners engaging in active travel - Positive trend in provision of cycle parking (based on a rolling average) to support the target of all Londoners doing two ten-minute periods of active travel a day by 2041.

- Air Quality - Positive trend in approved referable development applications demonstrating that they meet at least air quality neutral standard for emissions (based on a rolling average).

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Steve Chambers
Policy and Research Coordinator
Living Streets