



Response to the Mayor's London Plan 2017

About the London Cycling Campaign

The London Cycling Campaign (LCC) represents the interests of those who cycle in the capital and those who want to. Member-led, we have 12,500 full members and another 30,000 supporters.

Our vision for London is a city where people of all ages and abilities can cycle safely and enjoyably, and we believe that making cycling the number one transport choice for everyday local journeys will generate immense quality of life, environmental, health and economic benefits for everyone.

We campaign for London's political leaders and decision-makers to remove the barriers that prevent people benefiting from the freedom and convenience that cycling brings, including by developing and proposing our own innovative solutions.

We also work in partnership with businesses, local authorities, community groups, schools and other institutions to directly promote cycling at the grass roots and across all London's communities.

LCC welcomes the opportunity to comment on the Mayor's London Plan.

Overall Response

The draft London Plan and the draft Mayor's Transport Strategy (MTS) both include the headline target that 80% of all personal trips will be made by public

transport, cycling and walking (PTW&C) by 2041 instead of the current 62%. The London Cycling Campaign (LCC) warmly welcomes and strongly endorses this target. Indeed, given that the London Plan predicts that London's population will grow beyond 10.5 million by 2041 – equivalent to adding the current populations of both Birmingham and Manchester - mass mode shift to PTW&C is essential to stop London grinding to a halt. It is also essential to ensure that all those businesses and residents in the new, higher density mixed developments that the Plan is sensibly intended to promote have access to affordable and convenient transport. Moreover the importance of minimising car use to reduce air pollution, carbon emissions and inactivity-related ill-health cannot be overstated.

However, whilst strongly endorsing the cross-referencing of the 2041 mode shift target in the London Plan and MTS, LCC does have two high level concerns. The first is regarding road pricing. LCC has always argued that high quality cycling infrastructure, and traffic volume and speed reduction, are inseparable requirements for releasing the suppressed potential for cycling: therefore, as well as increased use of physical measures to reduce motor vehicle movements (e.g. in residential areas), the deployment of emerging digital technology to create smart road pricing is an absolute necessity. We would consequently like to see a commitment to *trailing, refining and rolling out smart road pricing across London specified in the London Plan* (and would like to see the reference to such pricing that is already contained in the MTS *improved to echo this*). Doing so would send an important signal to the market that boroughs and developers should favour projects that build-in options to avoid car use, e.g. via the provision of on-site, on-demand cycle and vehicle hire.

The second concern is about policy integration: LCC warmly welcomed the vision originally set out by the Mayor in A City for All Londoners, and we recognise that this vision set the context for the subsequent development of the London Plan and sectoral mayoral strategies (such as Transport, Environment and the Economy). However, to ensure that the targets and high level policies across all of these individual strategies are not just coherent and mutually-reinforcing (as intended) but are also *clearly communicated as an integrated whole*, LCC would like to see the main strands across the Plan and all draft mayoral strategies woven together into a single Strategic Plan for London. We recognise that enormous effort has been put into achieving consistency across the individual strategies; but a unified Strategic Plan for

London would provide a robust and compelling statement of how the full policy architecture will achieve the sustainable development of London, or “good growth” as the Mayor puts it, which is at the apex of his vision. Narrowly, but importantly, this would in particular make clearer the interplay between PTW&C and housing policies so as to create the new, world-leading, area-wide, design-led mixed developments that are so urgently needed.

Cycling Mode Share

A scenario presented in the evidence base accompanying the (draft) Mayor’s Transport Strategy postulates a cycling mode share of 15% within the 80% overall target for PTW&C. This is an approximate projection of the current average rate of cycling growth (~6% per annum) through to 2041.

If a 15% modal share for cycling were achieved, it would contribute substantially to the headline 80% ‘mode share’ target in the London Plan and would help resolve health, congestion and air quality issues identified in the London Plan.

While housing is, as often emphasised by Mayor Sadiq Khan, a key issue in the Plan, the document recognises that developments, whether of homes or workplaces, need to cut rather than boost car use:

“As the population grows, a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use. Implementing the [reduced] parking [for cars] standards in this Plan is therefore an essential measure to support the delivery of new housing across the city”¹

“A shift from car use to more space-efficient travel also provides the only [our emphasis] long-term solution to the road congestion challenges that threaten London’s status as an efficient, well-functioning globally-competitive city.”²

LCC shares and fully endorses this view – it is something we have argued and championed for many years.

Modal shift

As the Mayor has recognised, the target of 80% non-car travel by 2041 is an essential element of keeping London moving: if motoring grows in line with

¹ London Plan p 421

² London Plan p 402

population growth (from 8.7 million residents today to a predicted 10.5 million in 2041) then the capital faces ‘gridlock.’

So, quite aside from the health benefits of cycling to the population (currently only 34% of Londoners report getting the NHS-recommended 20 minutes of brisk walking or cycling per day), and the gains in air quality from a switch from cars to cycles (collectively road transport, including freight, accounts for 50% of NOx pollutants according to TfL), we need the switch away from more motoring to stay in business.

As support from more than 180 employers for the East-West Cycle Superhighway shows³, businesses are well aware of the need for a better cycling environment. To be attractive to businesses and their workers, a modern city can no longer be a concrete jungle intertwined with high-speed roads; instead it needs a people-friendly environment with good public transport links, attractive public spaces and a network of high-grade cycle routes.

The same TfL ‘scenario’ that considers a 15% cycling mode share estimates such a shift to cycling in mode share would result in a 13% reduction in congestion – and a reduction of 1.2 million car journeys per day (more than a third of the 3 million the Mayor wants to see). And while reaching 15% may seem a radical change for London, it’s still well below Amsterdam (35%) or Copenhagen (30%) and comparable to cycling mode shares in Tokyo (16%) and Munich (14%).

Developments and road schemes

LCC strongly supports references in the London Plan to promoting and designing for PTW&C rather than cars in all new developments. We note that this includes developments for housing, transport hubs, sports facilities, health centres and offices.

However, to ensure borough developments and road infrastructure schemes meet the expectations of the London Plan the language used in the Plan policies needs to be significantly strengthened.

The reduction in motor traffic of 10-15% by 2041 proposed in the MTS⁴ is not an option for the London Plan, but a necessity to “keep London moving,

³ <https://cyclingworks.wordpress.com/>

⁴ MTS p21

working and growing” to use a phrase from the Mayor’s [Healthy Streets](#) document. Indeed, we also note that the previous London Plan included a 5% modal share for cycling by 2026 (which is consistent with a growth rate that rises to 15% by 2041) and also built it in to TfL business plans.

While the Plan does not provide much detail regarding planned cycle infrastructure we trust this will be fleshed out in TfL business plans and other documents. The MTS contains a target that 70% of London homes must be within 400 metres of a high-quality cycle route by 2041: the Dutch experience confirms that this density of routes is required to enable mainstream participation in active travel.

While the ambitions of the London Plan and its sister document, the MTS, are very welcome, the realisation of them will require the full weight of the Mayor’s authority, and clarity of language in the London Plan, to ensure that all local authorities, and TfL, engage accordingly in the planning process.

Failure to deliver on transport will undermine progress on housing, sustainability, air quality and health outcomes.

Car-free developments

As TfL and academics often point out, the primary cause of congestion is the excessive number of cars on the road, many of which are making journeys that are either unnecessary or could easily be made by other modes.

Limits on car parking are one way of reducing demand for road space and LCC welcomes the plan to make new developments in central and much of inner London car-free and to limit parking provisions elsewhere.

We note that in Tokyo, a city of 9 million people, you cannot purchase a car unless you have a parking permit for it. The modal share of cycling in Tokyo is 16%, roughly the same as in the 2041 scenario for London examined in the MTS.

In Amsterdam, car parking charges are very high and it can take several years to secure a resident’s parking permit in some parts of town. In central Amsterdam half of all journeys are made by bike – an outcome that is welcomed by both the government and population.

Cycle parking

While cycle parking may not grab headlines, its proliferation is essential if we are to see the 45% increase in cycling, over the next five years, targeted in the TfL business plan. LCC welcomes the increases in proposed parking standards for new developments in the London Plan⁵. We strongly support the proposed increase in provision for new, central office developments and smaller flats.

For existing premises, however, whether homes, workplaces or shops, we note that neither the London Plan nor MTS make specific proposals. Under previous Mayor Boris Johnson, around 20,000 on-street bike spaces were installed per year. It's evidently not enough (Hackney has a 5,000 person waiting list for on-street cycle "hangars"), especially if cycling grows at the 2016 rate of 8.8% per annum.

The London Plan and MTS must provide strong guidance to highway authorities to increase both public cycle parking provision (on shopping streets and at key destinations such as stations), as well as secure (locked) cycle parking compounds (hangars and lockers) on streets and estates, and encourage far more secure or CCTV-covered and weather-proofed cycle parking at major train and bus interchanges also. This will be essential to sustain the planned growth in cycle use contained in both the London Plan and MTS.

Road pricing

The missing element in the transport chapter of the London Plan is road pricing. We note the reference stating that "*existing schemes [to be] reviewed*" in 2018-20 and "*next generation charging (subject to further assessment)*" planned for 2022-41 (both in Table 10.1 page 407). However the rest of the document does not address what must surely be an essential element of any long term plan to cut car use.

The arrival of the congestion charging zone reduced car journeys in central London by around 20% (car journeys have risen back to previous levels since), and saw a one third increase in cycle journeys into the central area. With a few exceptions, such as on some streets in the City of London, the short term gain in road space was not reallocated to more efficient and more sustainable modes like PTW&C.

⁵ Most of the increases proposed in 2018 were initially proposed by the consultant's report submitted as evidence submitted with the Further Alterations to the London Plan in 2014.

If the Mayor wants to achieve his target of 80% of journeys by PTW&C then the potential of road pricing to free up the necessary space for other modes must be exploited. Without the additional space gained through a dynamic road pricing scheme, improved performance in public transport and greater safety for walking and cycling will not be achieved and modal shift will be constrained. Fewer motor vehicles on the roads could improve road safety and enable more Healthy Streets schemes to be implemented.

We note that although car use fell in London over the decade to 2015, it rose 1.6% in 2016, helped by economic growth. Dynamic road pricing – which varies the price to use roads according to variables such as time of day, location and vehicle emissions - would likely reverse that upturn and lay a base for realising the London Plan ambitions.

We call for the London Plan to include a commitment to *trailing, refining and rolling out smart road pricing across the capital.*

Summary

The new London Plan explicitly seeks to reduce car use. Instead of trying to ‘balance’ the needs of all road users it recognises a hierarchy where active travel and public transport are prioritised over motoring because it’s the ‘best use of land’ as well as healthier and cleaner. LCC has long championed this common sense approach.

The 25 year Plan does propose to limit car parking growth but it doesn’t move forward on road pricing in the short term. Charging would free up road space which could then be used more efficiently, notably for sustainable transport modes (which are strongly supported in the Plan). It also encourages people to look for alternatives to motoring.

High grade cycle infrastructure can deliver high cycling volumes, as seen in Holland and on our own Superhighways, but it is often constrained by a reluctance to re-allocate road space. The political will, at both city-wide and local level, to deliver has to go beyond the words of the London Plan and translate into on-street outcomes.

Detailed comments (suggested additions in italics)

Page	Item	LCC comment
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<p>0.0.10 How to use the document p4</p>	<p>Mayoral Development Corporations</p>	<p>It is vital that the Mayor ensures that Plan policies, such as the growth of sustainable transport, are implemented by the Mayoral Development Corporations (MDCs). The failings of the London Legacy Development Corporation (LLDC), and its predecessors, to provide satisfactory cycling infrastructure was specifically identified in the Mayor's Vision for Cycling of 2013 (pages 28 and 29) . Unlike local authorities, MDCs are not subject to an electoral process or regular oversight from residents. Planning applications issued by MDCs can be hard to access and examine.</p>
<p>Policy GG2 Making the best use of land p15</p>	<p>B + E</p>	<p>Add: design led-led approach <i>that further promotes active travel</i></p> <p>We strongly support item E. We trust 'those involved in planning and development' who must implement this point includes both local authorities and MDCs.</p>
<p>Policy GG4 Delivering the homes Londoners need p19</p>	<p>C</p>	<p>Add: good quality homes that meet high standards of design and provide for identified needs, including for specialist housing <i>and active travel</i></p>
<p>Policy GG5 Growing a good economy p21</p>	<p>G</p>	<p>Add: to support agglomeration, <i>active travel</i> and economic activity</p>
<p>Policy SD1 Opportunity Areas p28,29</p>	<p>A + B</p>	<p>Add to items 8A and 7B – ambitious modal share targets <i>that significantly exceed those of surrounding areas</i></p> <p>We note that with appropriate planning, opportunity areas can match or exceed</p>

		<p>cycling levels in Hackney or Hammersmith.</p> <p>We also note that the LLDC sought to compare its modal targets to those of Newham rather than those of neighbouring wards in Hackney and Tower Hamlets which showed much higher levels of commuter cycling.</p> <p>In Dutch new towns such as Houten and Utrecht planning successfully maximises cycle trips to achieve a modal share above the already high Dutch average of 25%.</p>
<p>Policy SD4 The Central Activities Zone (CAZ) p66</p>	H	<p>Add: public realm improvements, <i>including high quality cycling infrastructure</i>, and the reduction of traffic dominance</p>
<p>Policy SD5 Offices, other strategic functions and residential development in the CAZ p75</p>	J (additional)	<p>Add item J: <i>Office developments must meet or exceed the cycle parking standards in Plan table 10.2 and provide safe access to main cycle routes</i></p>
<p>Policy SD6 Town centres p78,79</p>	K (additional)	<p>Add item K: <i>High quality cycle infrastructure to key destinations in town centres, and between proximal town centres should be provided</i></p>
<p>Policy SD7 Town centre network p81</p>	H (additional)	<p>Add item H: <i>All town centres , including International, Metropolitan, Major and District, must provide high quality access by walking and cycling to reduce motor traffic dominance</i></p> <p>We note the comment on p85 which states that town centres dominated by retail parks and large format stores are “heavily reliant on the car.” Provision of high grade walking and cycling routes as well as better public transport reduces</p>

		car dependency. Stratford City, with good public transport and some provision for cycling, is less reliant on cars than anticipated and the Westfield shopping centre located there is in the process of converting car parking space to shops.
Policy SD9 Town centres: Local partnerships and implementation p86	4 C) and D), 5	Add to 4 c): public transport and <i>walking and cycling</i> accessibility and capacity Add to 4 d): planned for or potential public transport <i>and walking and cycling</i> improvements Add to 5 : and future public transport <i>and walking and cycling</i> provision Add example e): <i>Delivering a high quality protected or off-road cycle route</i>
Policy SD10 Strategic and local regeneration p92	B	Add: spatial inequalities and the environmental, <i>active travel</i> , economic
Policy D1 London's form and characteristics p98	8)	Replace: encourage and facilitate by <i>provide for increased</i> active travel
Policy D2 Delivering good design p102	A 5), H	Add A 5): transport networks (particularly walking and cycling networks (<i>existing and planned</i>) We note the historic example of a TfL/Islington 'cycle route implementation plan' next to the new Arsenal football stadium which failed to consider either the stadium users or the developer's s106 obligations Add H: regarding the quality of design and <i>the construction logistics and management agreement</i>

		We note that not all local authorities currently seek to secure conditions that would ensure that construction logistics and management plans are required and adhere to best practice for “work-related road risk”
Policy D3 Inclusive design p106	A 4)	Add: <i>consider the needs of people who use adapted cycles</i> (those used by people with disabilities)
Policy D4 Housing quality and standards p109	Add H	Add: <i>Dwellings should provide cycle parking in line with London Plan Table 10.2</i>
Policy D5 Accessible housing p115	A	Add: <i>3) accessible housing should be designed with convenient parking provision for adapted cycles/wheelchairs and reserved for this purpose</i> See Plan page 115 bullet three: “sufficient level, secure and convenient externally accessible storage is provided for cycles, deliveries, and other bulky items”.
Policy D6 Optimising housing density p112	A 2), B 2)	Add A 2): <i>by walking and cycling (existing and planned routes meeting LCDS standards)</i> Add B 2): <i>through encouraging active travel (by providing suitable infrastructure)</i> should be taken into account. See item 3.6.4 on page 120 “In certain circumstances, development will be contingent on the future provision of public transport, walking and cycling infrastructure.”
Policy D7 Public realm p122	D, L	Replace D (last line): “particular focus” with <i>prioritised</i> Add L: <i>as well as sufficient cycle parking in the carriageway</i>

Policy D8 Tall buildings p126	C 2) g)	Add: adjoining buildings. <i>Building construction must follow best practice as defined in the Construction Logistics and Community Safety (CLOCS) standards</i>
Figure 4.2 - Public Transport Access Levels P151		Add: equivalent map of enhanced Public Transport Access Levels (PTAL) to show cycling distances as illustrated in MTS p197. We note that currently a PTAL level of 2 can, for example, include a walking distance of 5 minutes to a bus stop plus 8 minutes to a rail station with services running at 10 minute intervals. Given the availability of live train and bus times on smartphones PTAL levels may not fully reflect more timely real-life accessibility. Crowding, on the other hand, is not considered in PTALs.
Policy S1 Developing London's social infrastructure p202	E	Add: by public transport, <i>high quality cycling routes</i> and walking
Policy S2 Health and social care facilities p204	C	Add: Add: by public transport, <i>high quality cycling routes</i> and walking
Policy S3 Education and childcare facilities p208	B 2), 3), 4)	Add B 2): and access by walking and <i>high quality cycling routes</i> Add B 3): at entrances, <i>and restrictions on vehicle access at school drop off and pick up times</i> Add B 4): link to existing <i>and planned</i> footpath <i>and high quality cycle networks</i> to create ... We note statement at 5.3.10 p211" All children should be able to travel to

		school by walking, cycling or public transport.”
Policy S4 Play and informal recreation p212	B 6)	<p>Add 6): <i>Must provide one cycle parking space for every eight peak time users</i></p> <p>We assume play areas are covered under class D2 in table 10.2. Some play areas are small but attract large numbers of visitors including scooter as well as cycle users.</p>
Policy S5 Sports and recreation facilities p214	A 3), B 1), B 5)	<p>Replace A 3): “encourage” with <i>provide</i></p> <p>Replace B 1): and link to high quality networks for walking and cycling</p> <p>Add B 5) <i>provide cycle parking spaces in line with table 10.2 p 417</i></p> <p>Note that for some sports facilities (e.g. swimming pools) the cycle parking levels recommended in table 10.2 are too low based on current usage.</p>
Policy E9 Retail, markets and hot food takeaways p256	B 10)	<p>Add 10): <i>work with retailers and businesses (including SMEs) to ensure adequate on- street, or within business curtilage, cycle parking is provided</i></p> <p>We note, with concern, that while major chains frequently provide cycle parking, or secure its installation by councils, this is not the case with smaller retailers who can lose business in consequence by not having cycle parking close by.</p>
Policy E10 Visitor infrastructure p261	A	<p>Add: and supporting infrastructure (<i>including high quality cycle routes</i>), particularly...</p> <p>See 6.10.1 p262 “measures to promote access by walking, cycling and public transport.”</p>

Policy HC5 Supporting London's culture and creative industries p287	C 5)	Add: integrate public transport, <i>high quality cycle infrastructure</i> , digital and other infrastructure
Policy HC6 Supporting the night-time economy p292	B	Add: 7) <i>provide cycle parking at popular destinations</i>
Policy G1 Green infrastructure p302	C	Add 3) <i>improve access to public green spaces by public transport, walking and cycling</i> We note the very significant opportunities for active travel that parks provide. Barriers to access, such as early closure in winter months, often force families and children to walk or cycle using hazardous and polluted main roads, or use cars.
Policy SI1 Improving air quality p320	A	Intro: replace all cases of should with <i>must</i> (this is a legal obligation) Add 7): <i>Development proposals must demonstrate how they will contribute to the Mayor's target of reducing car trips (which contribute to worse air quality) and increasing public transport, walking and cycling trips</i>
Policy SI8 Waste capacity and net waste self- sufficiency p347	D	Add 6): <i>provision of hard standing (stable and level surfaces) for all site delivery vehicles to eliminate on-road use of, more hazardous, off-road (N3G) vehicles</i> We note that the promotion of hard standing at landfill sites is an on-going programme at TfL and ties in with the

		Mayor's commitment to only allow the safest lorries to be used in London.
Policy SI10 Aggregates p356	D intro and 3)	Intro add: of aggregates <i>and reduce lorry movements</i> Add 3): <i>encourage a reduction in empty-load lorry movements</i> We note some developers use the same vehicles to deliver aggregate and remove landfill where this is practicable.
Policy SI16 Waterways – use and enjoyment p371	H	Add: not private spaces <i>and will permit shared use by walkers and people on cycles including those riding adapted cycles</i>
Policy T1 Strategic approach to transport p402	A	Add: should support <i>and facilitate</i>
Policy T2 Healthy Streets p403	B 2), D 3)	Replace B 2): “identify opportunities” with <i>identify and safeguard land</i> to improve the balance Add D 3): local walking and <i>high quality cycling</i>
Policy T3 Transport capacity, connectivity and safeguarding p406	B	Intro replace: “ensure the provision of” by <i>secure</i> Add B 2): in order to provide <i>both public and active</i> transport functions Add C: vital transport functions (<i>including cycle routes</i>) or prevent Add D: , river crossings, (word <i>and</i> deleted) an eastwards extension of the Elizabeth Line <i>and cycle network development</i> We note the expectation of a 45% increase in cycling by 2022/23 (see TfL 5 year Business Plan) and an expectation of a 6% modal share (see London Plan evidence base p 13 - it equates to more than 2.5 times current levels) and a

		<p>London Plan evidence base modelling of a higher level, 15% modal share, as a potential element of the shift to much the London Plan long term target of 80% of journeys by PTW&C by 2041. While the latter level of cycling modal shift is possible (it's approximately a continuation of current growth levels) it will not occur unless boroughs see cycling infrastructure provision as a priority.</p>
<p>Table 10.1 - Indicative list of transport schemes p407</p>		<p>Add: <i>Cycle parking and cycle hub development</i> (see 10.3.2 on p 410)</p> <p>We note that the item "Cycle network development" covers a large number of major schemes that boroughs are, or will be, involved in. Previously these schemes were categorised as Superhighways, Quietways, Better Junctions etc. (as well as local schemes). Assuming these schemes are being brought together in the London Plan under one heading, it is essential that boroughs are aware that that is the case and that "Development plans and development proposals should support" (p 402) all of the schemes that were previously mentioned separately in earlier documents.</p> <p>Road pricing – we note the two references to road pricing which has to be an essential component of the Mayor's plan to reduce congestion and generate modal shift. We comment at greater length in our introduction.</p>
<p>Policy T5 Cycling p414</p>	<p>A 1), A 2), B, C, F, G</p>	<p>Add A 1): improved <i>high quality</i> infrastructure</p>

		<p>Add A 2): Design Standards (<i>and subsequent revisions</i>) Add B: town centre cycling parking, <i>at a close walking distance to the development</i>, is also acceptable Replace C: “propose” with <i>deliver</i> and replace “hangers” with <i>hangars</i> Delete F: <i>with the exception of Class C3-C4 uses and Class A uses where the size threshold specified in table 10.2 has not been met</i></p> <p>We do not understand why in the draft Plan an estate with 40 housing units, for example, requires 2 visitor parking spaces (i.e. minimum of one bike stand), whereas an estate with 39 units requires none. Similarly with smaller retail units (those below 100 sq. m.). We note that Policy T5 B allows for the developer to make an arrangement (for cycle parking on public land) with the local authority, if space is not available within the curtilage of the building.</p> <p>Add G (copied from paragraph 10.5.5): <i>Cycle parking and cycle parking areas should allow easy access and provide facilities for disabled cyclists. This could include identifying and reserving specific spaces which provide step-free cycle parking and opportunities for people using adapted cycles, as well as providing facilities for other non-standard cycles such as tricycles, cargo bicycles and bicycles with trailers, for both long-stay and short-stay parking</i></p>
Table 10.2 - Minimum cycle parking standards	A 1), A 2)-5), B 1)-8), D 1)-2)	Add A1, column 2: <i>or one space per 8 FTE staff whichever is the higher</i>

p415

Add A2, column 2: *or one space per 8 FTE staff whichever is the higher*

Add A2-A5, in column 2: *or one space per 8 FTE staff whichever is the higher*

Add B1, column 2: *or one space per 8 FTE staff whichever is the higher*

Add B2-B8, column 2: *or one space per 8 FTE staff whichever is the higher*

D 1): It is unclear what short stay parking is to be provided at nurseries (the requirement runs across both columns).

Experience in the boroughs of Hackney and Tower Hamlets shows that several carers often drop off children by cycle at the same time (at all types of nursery and child centre) and require short term cycle parking. We suggest short stay: *1 space per 15 students*

Primary schools often have carers dropping smaller children off by bike and walking them to their class areas, while leaving their bikes outside the school. One space per 100 students would only allow one carer per three classes to arrive by bike. We recommend short stay: *1 space per 15 students up to year 3*

Secondary school spaces need to consider other activities (non-school use of halls, pools, sport areas etc.) taking place at schools. If secure cycle parking on-site is not accessible to evening class users, additional spaces need to be provided on the 1 per 8 students basis

Add D 2) Sports short stay:

		<p><i>Swimming pools : 1 space per 30 sqm (GEA)</i></p> <p>Note: the Hackney Lido (50m pool) with a capacity of 350 swimmers generates demand of up to 100 cycle spaces.</p>
Fig 10.2 p418		<p>All areas granted Liveable Neighbourhood funding should be included in the higher minimum standards category</p>
Policy T7 Freight and servicing p430	J	<p>Add J (copied from paragraph 10.7.6): <i>Transport for London's guidance on Construction Logistics and Delivery and Servicing Plans should be adhered to when preparing planning applications. Plans should be developed in line with this guidance and adopt the latest standards around safety and environmental performance of vehicles</i></p>