

Draft New London Plan 2017

Sustrans' submission to the Greater London Authority

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Summary

Sustrans broadly supports the new London Plan, given the long-term policy direction it proposes in facing the immediate challenges to Londoners' health and quality of life while reducing greenhouse gas emissions. Population growth increases pressures on infrastructure but also presents an opportunity to improve quality of life and reduce environmental impact by shifting the way Londoners travel. Accordingly:

- We support the continued approach of the plan to focus denser, urban mixed-use development around existing and planned public transport, walking and cycling – serving to reduce the need for a car.
- We believe there is scope to improve Opportunity Area policy to ensure better outcomes for walking and cycling.
- We strongly support the Healthy Streets Approach and the way it is embedded throughout the plan. This should deliver streets and public spaces in new development that support and enable walking and cycling.
- We support the positive increase in cycle parking standards to ensure new buildings and spaces provide infrastructure to enable cycling.
- We support the concomitant car parking maxima that provide for car-free and car-lite developments in places that have good accessibility to town centres and public transport.

Together, the linked approach to transport and planning policy provides a positive framework to manage London's growth and maximise the opportunities that come with it, supporting positive trends in declining car-use and ownership and the goals of the Mayor's Transport Strategy to use transport to improve Londoners' health and environment.

Background

The role of walking and cycling in London's sustainable development

London's projected growth over the coming decades requires continued and accelerated change in the way Londoners travel. London's population is growing while its streets, roads and public spaces are not. To these ends, the London Plan must help facilitate:

- a more efficient and effective use of the finite space available for the movement of people and goods;
- a healthier, more active transport system;
- a less environmentally damaging transport system – one that no longer contributes toward illegal and lethal levels of air pollution and unnecessary greenhouse gas emissions.

There is already major opportunity to shift journeys away from car use. Two-thirds of the trips Londoners make every day are shorter than 5 kilometres, journeys that could be cycled in under 20 minutes.¹ The way London develops – determined by the London plan - can help to shift journeys away from private car use.

Streets that prioritise walking and cycling (active travel) are not only more efficient at moving people; they are the primary way to improve Londoners health and quality of life. 20 minutes of active travel a day is one of the main ways people can stay healthy and prevent ill-health. Regular active travel reduces the risk of many chronic conditions, including coronary heart disease, stroke, type 2 diabetes, cancer, obesity, mental health problems and musculoskeletal conditions. Preventing these through active travel leads to longer and better lives for all.

The most effective way for the Mayor to improve Londoners' health, keep the city's transport system moving and reduce contribution toward climate change and air pollution is, therefore, to enable and encourage a much greater share of trips by active travel. This is done both through Transport for London and borough investment, but also through the London Plan; by shaping the way London develops, specifying the type of development and how the public realm should be designed through the London Plan.

Shaping the way Londoners travel

Patterns of land-use and development determine how long people have to travel from their homes to reach work, education or the services they rely on for daily life. Consequently, this determines how likely they are to choose walking, cycling or public transport over the car.

Mixed-use, denser development that is closer to public transport and town-centres, supports car-free lifestyles and helps to achieve a more sustainable city. Development that provides high-quality, convenient cycle parking for short and long-stay users as well as streets on which cycling or walking are safe, attractive and convenient and linking into a London-wide network of routes are critical to generating shift to active modes. Public transport also supports car-free and active lifestyles; the short walk or cycle to a station or bus stop, for instance, contributing time toward the aim of all Londoners to achieve the two ten minute periods of active travel each day.

Creating and redesigning new streets and public spaces

The development and regeneration of London also presents a major opportunity to design streets and public spaces anew and retrofit our existing street network to prioritise walking and cycling, a key mechanism to overcome people's safety concerns, reduce road danger and instigate mode shift.

The scale of London's street network means that borough and Transport for London investment alone will not deliver the shift to cycling and walking required. For example, London has 31 kilometres of segregated cycle lane for a population of approximately 8 million people. Denmark's capital, Copenhagen, has a network of 370 kilometres of segregated cycle lane serving a quarter of London's population. Accordingly, it achieves one of the highest mode shares for cycling of any city in the world. London should be moving toward this quantum of provision over the course of the plan and the London Plan should clearly require new development to contribute toward this aim (reflected in Mayor's Transport Strategy Proposal 3).

With the right policies and supporting mechanisms, the new London Plan could transform the health of Londoners for the better, improve the environment and manage the growth in demand for transport sustainably. Sustrans believes this new Draft London Plan goes a long way toward achieving these outcomes.

Key comments

Our views as to what was required of the new plan were set out in Sustrans (2017) *Laying the Foundations for a Healthier London*.² Consequently, regarding the new London Plan:

- **We strongly support the incorporation of the Healthy Streets Approach throughout the plan** – this will support a strategic, network and local level approach to prioritising healthy, active travel through the design and management of roads, streets and public spaces.
- **We support much of the transport chapter, particularly the new approaches to both cycle and car parking** while also retaining the strong link to the London Cycle Design Standards, where appropriate. Specific comments on the standards are set out later in this submission.
- **We welcome the 'good growth' vision and supporting policies** that will focus new development in areas with good existing or planned public transport, walking and cycling accessibility (Policy GG1); that plan for transport around the Mayor's Strategic Aim of 80 percent of journeys to be by sustainable means by 2041 (Policy GG2); that make public health a material consideration in the plan making and decision making process (Policy GG3); and for achieving a zero-carbon city by 2050 (Policy GG6).
- We welcome an approach to spatial development that seeks to maximise development on significant clusters of brownfield land where there is committed public transport investment and or existing/planned town centre services; and restricting growth in the greenbelt and metropolitan open land. Making Londoners travel much more sustainably will be helped by the densification and intensification of land-use. The specific policies advocating mode shift in Opportunity Areas, the Central London Activities Zone (CAZ) and Town Centres are welcome, while we have specific comments on the wording and mechanisms.
- **We welcome the Design chapter's focus on reducing the dominance of vehicles**, both moving and stationary, and designing a public realm that facilitates active travel.

We are concerned, however, that:

- The Opportunity Areas policy (SD1) wording is too vague, failing to specify for which transport modes the targets should be 'ambitious' and failing to specify a mechanism to achieve these targets;
- The tools or guidance to determine existing and planned walking and cycling accessibility and connectivity are lacking, which could lead to an inconsistency of interpretation across different planning authorities;
- The cycle parking standards (T5), while raised compared to the previous Plan, largely follow from a 2013 evidence report; the provided evidence report largely reconsiders four specific changes from the previous plan, it does not reconsider the baseline demand for cycle parking in each land-use;
- The residential car parking maxima (Table 10.3) for areas in Outer London of PTAL 2, O – 1 are above the current average levels of car ownership for these areas and thus this standard would allow for a growth in car ownership, against the strategic aims of the Mayor's Transport Strategy to reduce car trips by 3 million a day.

Improving Londoners' health and quality of life, while undergoing major population growth is a challenge for London but also an opportunity. The new London plan is critical in anticipating and managing that growth sustainability. To achieve a sustainable transport system, it should favour dense, mixed-use development to reduce distances between homes, services and jobs. Design guidance and supporting policies should make walking and cycling on streets and the public realm safe, convenient and attractive. Together, this will make walking and cycling the more likely choice of transport for these short journeys, helping to keep London moving, improve Londoners' health and create vibrant spaces for communities. In line with these principles, we welcome the new London Plan and strongly support many of the policies and new approaches within it. Our detailed comments follow.

Detailed Comments

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

Paragraph / Policy Ref	Comment	Suggested wording OR proposed change(s)
Policy GG1 - Building strong and inclusive communities	Sustrans strongly supports Policy GG1 C and E for their emphasis on people’s ease-of-use of streets and public space in the design and master planning of development, specifically, to “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.” and; “Ensure that new buildings and the spaces they create are designed to reinforce or enhance the legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements”.	
1.2.3 and 1.2.4	Sustrans supports the approach to ‘making the best use of land’ for the reasons identified in paragraph 1.2.3. As evidenced by Londoners’ travel patterns, denser, mixed-use development typically enables short journeys to be made by foot or by bike, making healthier journeys and using limited space efficiently while also reducing car dependency. ³	
Policy GG2 - Making the best use of land	<p>A. We welcome the inclusion of public transport, walking and cycling connectivity in consideration over the intensification of land use, but note that the intensification of land-use also represents an opportunity to improve active and sustainable transport connectivity through planning.</p> <p>D. We welcome the commitment to protect open spaces and promote the creation of new green spaces and infrastructure</p> <p>E. We strongly support the policy to “plan for good local walking, cycling and public transport connections to support a strategic target of 80 percent of all journeys using sustainable travel...”</p>	

<p>Policy GG3 - Creating a Healthy City</p>	<p>We strongly support the inclusion of health in the strategic Good Growth policies of the plan. In particular, the approach identified in A, B, C and D and those which embed the Healthy Streets Approach into planning decisions.</p>	
<p>Policy GG5 - Growing a good economy</p>	<p>G – Sustrans welcomes the plan’s explicit recognition of the role of public transport, walking and cycling infrastructure in supporting agglomeration and economic activity. At a strategic level, growing London’s economy depends on the city’s ability to move people between where they live and where they work. With finite road space, this can only be achieved by shifting travel toward more space efficient means. Similarly, at a local level improving infrastructure to support more space-efficient modes of travel can, first, improve the vibrancy of places by reducing the dominance of traffic and, second, increase the people movement capacity of a street, increasing footfall and catchment areas for local shopping parades.</p>	
<p>Policy GG6 - Increasing efficiency and resilience</p>	<p>Sustrans welcomes the focus on a zero carbon city by 2050, through a low carbon circular economy. Active travel has a critical role to play in reducing transport emissions.</p>	

Chapter 2: Spatial Development Patterns

Chapter Overview comments

Guided by Greater London Authority planners, Opportunity Areas should be exemplary for the Healthy Streets they deliver. Through the framework development process, Healthy Streets Strategies should be developed that plan the walking and cycling networks for the area. The Battersea Nine Elms Cycling Strategy has led to the proposals for dramatically enhanced streets on that site, funded through local planning obligations.

There is a pressing need for local transport improvements across London to unlock suppressed walking and cycling potential. Less than one percent of London's road network features cycling infrastructure of sufficient quality and it is our view that opportunities to improve local streets, public space and supporting transport infrastructure must be maximised through the Opportunity Area process. We feel that there is a gap between strategic targets (SD1 A 8 and B 7) and specific local projects identified in the supporting text (for example, 2.1.16 and 2.1.45). **The chapter should include a policy statement indicating that all streets and public spaces within the scope of Opportunity Areas should be assessed for cycling and walking improvements**, following best-practice guidance contained within the London Cycle Design Standards and Healthy Streets Check.

Specific Comments

Paragraph/ Policy Ref	Comment	Suggested wording OR proposed change(s)
Opportunity Areas		
SD1 A 8	<p>Sustrans strongly supports the ambition for Opportunity Areas (OAs) to facilitate ambitious transport mode share targets to ensure that the opportunities to improve infrastructure through development are harnessed and London moves towards a low carbon, zero emission, and healthy transport system. However, the current wording lacks clarity as to which modes of transport should have ambitions targets. Therefore we consider the need to specify active and sustainable transport, in line with the Mayor’s Transport Strategy (MTS).</p>	<p>SD1 A 8) “ensure that development facilitates progress toward ambitious sustainable and active transport mode share targets”</p> <p>Supporting paragraph explains that OAs should develop ambitious mode share targets for sustainable and active travel relative to the equivalent existing mode shares of the surrounding area, taking into account timeframes for development, underlying trends and strategic MTS targets.</p> <p>OAPFs and other area-based strategies should produce supporting Healthy Streets and Transport Strategies setting out how they will achieve mode share targets.</p>
SD1 B 7	<p>We support the requirement of boroughs to include ambitious mode share targets for OAs in their development plans and approach to decisions. New development should deliver much higher mode shares for walking, cycling and public transport use relative to the surrounding area, particularly considering the likely public transport accessibility and restricted parking standards alongside the large-scale opportunities presented by OAs to redesign streets and public space.</p>	
2.1.5 & 2.1.10	<p>We welcome further clarity provided in these explanatory paragraphs.</p>	

2.1.16 – 2.1.45	We welcome the identification of walking and cycling improvements to these OAs, including: <ul style="list-style-type: none"> • New Cross Road (A2) • Access to Lea Valley Regional Park • Thames River Crossings • Severance caused by river Lea, DLR lines and A12 	We feel there is a gap between the strategic and local; that all streets within the scope of OAs should be assessed for cycling and walking improvement with a view to fund and carry out appropriate works.
2.1.66	Euston: excluding future growth and suppressed demand, there is significant existing demand that requires a substantial increase in cycle parking close to Euston Station, in addition to improvements to the surrounding environment.	“Scope exists to reconfigure Euston Square Gardens and the bus station to enhance this space and improve transport facilities, including: <ul style="list-style-type: none"> • Improved cycle and pedestrian connectivity and access, • a substantial increase in cycle parking, • new public space, and; • improved bus interchange.” Additionally, we believe there is significant scope to reimagine the role of Euston Road through its redevelopment.
The Central Activities Zone		
SD4 D	We welcome air quality positive approach, however, note that this must be minimum requirement for the Central Activities Zone (CAZ) And welcome supporting paragraph 2.4.8	“practical measures should be taken to improve air quality, using an air quality positive approach where possible ”
SD4 H	Strongly support the role of Healthy Streets Approach in enhancing the attractiveness of the CAZ	
Town Centres		
SD6 A 3 & 6	Strongly welcome the role of Town Centres in facilitating and improving the accessibility, attractiveness and convenience of walking and cycling.	
SD6 C	We welcome the consideration given to walking and cycling distances in the consideration of new housing in town centres.	
SD7 F	Support the focus of providing convenient and attractive access by walking and cycling to local and neighbourhood centres.	

2.7.4	We welcome walking and cycling as criteria by which town centres may be reclassified	
SD8 A1 & 2	Sustrans strongly supports the town centre development principles that firmly resist out-of-centre development (associated with increased car dependency and community severance) (Policy SD8 A 1); and the focus of development on sites that can be integrated into existing centres, walking and cycling networks and public transport to facilitate further shift away from car use and improve Londoners health, air quality and environment.	
SD8 B4 & 5	We welcome the focus for boroughs to identify sites by capitalising on the availability of services within walking and cycling distances and current and future public transport provision.	
SD8 C 3	We welcome the requirement for the provision of business delivery collection points to facilitate the consolidation of goods helping to reduce motor-vehicle traffic.	
SD9 A	Sustrans strongly supports the requirement for town centre strategies, including Healthy Streets, transport strategy, highways management and air quality.	

Chapter 3: Design

Specific comments

Paragraph / Policy Ref	Comment	Suggested wording and proposed change(s)
D1 A – London’s form and characteristics	Welcome the factors 1 – 10 that should guide the initial evaluation of development sites, particularly those that support active travel, including connectivity and land-use patterns, an inclusive environment, safe and secure environments, active frontages, green and open space, and reducing freight and servicing. We strongly support the inclusion of A8, which identifies how design should encourage and facilitate active travel.	
3.1.6	Welcome indication that design and layout should reduce the dominance of cars and provide permeability to support active travel.	
D2 A 4 & 5 – Collaboration in the wider South-East	Strongly support the requirement for boroughs to evaluate transport networks, particularly walking and cycling networks, in preparing Development Plans and Area Based Strategies.	
D3 A 2 – Growth Locations in the wider south-east and beyond	Support the Inclusive Design policy and note the increasing role of, and therefore, the need to design for, non-standard cycles in providing inclusive mobility, as highlighted in paragraph 3.3.1	
3.3.4	Welcome the instruction against high and low-level obstructions in the public realm.	
Optimising Housing Density		
D6 A 2	We support the requirement that consideration is 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.	
D6 B 2 & 3	We welcome the requirement to plan improvements to infrastructure capacity and accounting for the role of active travel (2) in supporting densities; and (3) that infrastructure capacity improvements, including walking and cycling networks, should be developed and phased accordingly.	

D6 C	We welcome the retention of the principle that public transport accessibility and density remain linked, and to require management plans when densities exceed certain thresholds according to PTAL scores. This is required to continue to reduce car dependency and ensure new development does not increase car use.	
3.6.3 – 3.6.6 inclusive	We support the approach outlined in these paragraphs and would welcome the identification of financial contributions and joint working with TfL as a mechanism for the delivery of Healthy Streets Approach and improvements to active travel infrastructure.	3.6.5 ... Opportunities to improve these connections to support higher density development and the potential to improve them, through joint working with TfL or financial contributions , should be identified.
D7 – Public Realm	Sustrans welcomes the policy statement setting out the requirements of the design of the public realm	
3.7.3 - 3.7.4	Welcome the definition of the public realm and strongly support the link to Healthy Streets Approach	
D8 C 2 d and e – Tall Buildings	Welcome the requirement for the development proposal to demonstrate that there is capacity in the area and transport network for the quantum of development.	

Chapter 4: Housing

Specific comments

Paragraph / Policy Ref	Comment	Suggested wording and proposed change(s)
H1 B 3 – Increasing Housing Supply	We welcome the requirement of boroughs to identify sites for housing delivery according to public transport capacity (a) and to capitalise on the trend of, and target for, reduced car use, by redevelopment car parks and low-density retail parks.	
Figure 4.3 – Proximity to Town Centres	Welcome the proximity to town centres and London Underground stations by walking distance as guidance for policy H1 B	

Chapter 5: Social Infrastructure

Specific comments

Paragraph/ Policy Ref	Comment	Suggested wording and proposed change(s)
S1 E – Developing London’s social infrastructure	Sustrans supports the identification of accessibility by public transport, cycling and walking in the planning and determination of social infrastructure development.	
5.1.8	We strongly support the application of the Healthy Streets Approach in explaining access requirements for social infrastructure.	
S3 - B 2 & 4 Education and childcare facilities	We support the requirement for education and childcare facilities to be accessible locations and link to existing footpath and cycle networks	
S4 – Play and Informal Recreation	We welcome the requirement for development proposals to increase opportunities for informal recreation and independent mobility, a key element of which will be through the improvement of streets and public realm, by providing low-traffic spaces and elsewhere reducing the dominance of motor-traffic, as identified in paragraphs 5.4.2 and 5.4.3	
S6 – Public Toilets	We support the inclusion of a policy for public toilets for their role in enabling a diverse range of people to spend time outside, supporting longer periods of time spent walking and cycling.	

Chapter 6: Economy

Specific comments

Paragraph/ Policy Ref	Comment	Suggested wording and proposed change(s)
E1 C & D – Offices	Sustrans strongly supports the policy of requiring office development to be supported by walking, cycling and public transport connectivity and capacity both in (C) central London and (D) inner and outer London; We also strongly support (D3) the requirement to take steps toward greater transport sustainability in existing urban business parks.	
6.1.4	We strongly support the requirement for office growth in Outer London to be supported by improvements to walking, cycling and public transport connectivity and capacity, however, it is not clear how capacity is defined with reference to cycle routes; this should reference the London Cycle Design Standards and/or Healthy Streets Approach.	
Land for Industry, logistics and services to support London's economic function		
E4 A 5	We welcome the provision for land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure, to reduce traffic in London and particularly Heavy Goods Vehicle traffic for the danger it poses people walking and cycling.	
E4 E	We welcome the provision for planning authorities to consider how well a site is connected by walking, cycling and public transport before releasing industrial land for other land-uses and the concomitant transport demands they will place on the area.	
6.7.5	We welcome further clarification of the potential negative impacts of substituting industrial land with land in other regions or boroughs, particularly the geographical spreading of supply chains, increasing vehicle miles and commute lengths, with consequences for congestion, air pollution and traffic levels.	
Locally Significant Industrial Sites		

E9 B 4 & 9	We welcome the support for convenience retail to reduce the need to travel beyond local and neighbourhood centres. We also welcome the encouragement for the redevelopment of out of centre retail and leisure uses to realise the full potential for reducing car use and dependency, and improve access by sustainable modes of travel.	
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Chapter 7: Heritage and Culture

No comment

Chapter 8: Green Infrastructure and Natural Environment

Specific comments

Paragraph/ Policy Ref	Comment	Suggested wording and proposed change(s)
G1 – Green Infrastructure	Sustrans broadly welcomes the commitment to green and open spaces and green infrastructure and the approach outlined in C, particularly, to use green infrastructure to address environmental and social challenges.	
G2 – London’s Green Belt	We welcome the protection of the Greenbelt as a means to prevent ‘sprawling’, car-dependent development patterns. We particularly support A 2 to enhance greenbelt space and improve Londoners’ access to it by walking and cycling.	
G3 – Metropolitan Open Land	We welcome the requirements to work with partners to enhance the quality and accessibility of Metropolitan Open Land including improved walking and cycling infrastructure as a key means of accessing the benefits of green space.	
G4 – Local green and open space	We strongly support the policy to make new areas of green space accessible, particularly in areas of deficiency (B). Walking and cycling infrastructure will be vital to improve access in areas of deficiency.	
Table 8.1 – Public open space categorisation	Sustrans welcomes the inclusion of pocket parks and Linear Open Spaces in the categorisation of public open spaces, recognising the significant value that ‘Greenways’, canal towpaths and other green routes through the city provide.	
G5 A – Urban greening	We welcome the approach set out for major development proposals to contribute to the greening of London. Such measures are important means to provide shade and shelter, mitigating temperature extremes to enhance the experience of walking.	
8.6.3	We welcome the clarifying policy that developments should seek to enhance and positively improve the nature conservation value of green corridors	

G7 – Trees and woodlands	We support the approach to tree and woodland management. Trees provide a range of valuable benefits that support walking and cycling journeys in weather and help to reduce pollution.	
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Chapter 9: Sustainable Infrastructure

Specific comments

Paragraph / Policy Ref	Comment	Suggested wording and proposed change(s)
SI1 – Improving Air Quality	Sustrans strongly supports policies to reduce air pollution and improve air quality, with a focus on reducing the exposure of vulnerable people.	
9.1.3	For large-scale developments, we welcome the aim to be Air Quality Positive and consider that this should be a <u>requirement</u> of Opportunity Areas to help reach legal limits as soon as possible, as identified in the Mayor's Transport Strategy.	
SI2 – Minimising Greenhouse Gas Emissions	We are concerned that there is no reference to the contribution to greenhouse gas emissions from transport, particularly given the thread of Healthy Streets Approach throughout the document. This policy should cross-reference the Transport policies to demonstrate the important role that parking restriction and traffic reduction has in delivering these policy outcomes.	Cross-reference Transport Policies
9.10.3	We welcome attempts to minimise the movements of aggregates by road, given the relative dangers from heavy goods vehicles.	
SI15 C – Water Transport	Support to increase freight transported by river for benefits it may have for road danger reduction as set out in 9.15.4.	
Waterways – use and enjoyment		
SI16 G	We welcome the requirement for development proposals along waterways to explore opportunities to provide inclusive access infrastructure.	
SI16 H	Support the requirement of development proposals to improve and expand the Thames Path (including National Cycle Routes 1 and 4) and towpaths, and provide better linkages to the transport network ensuring that these paths will be public spaces, accessible to all.	H Development proposals should improve and expand the Thames Path (including National Cycle Network Routes 1 and 4) and the towpaths and provide better

		<p>linkages to the transport network. This will require collaboration with relevant partners including the London boroughs, the PLA and the Canal and River Trust, the Environment Agency and Natural England, as well as landowner, developer and community representatives. These paths will be public and not private spaces.</p>
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Chapter 10: Transport

Chapter Overview comments

If planned poorly, London's growth threatens the viability and sustainability of the transport system – the streets, public spaces and supporting infrastructure that enables active travel, as well as traditional public transport provision. An overreliance on cars and unmitigated use of vehicles for goods and servicing would increase congestion, air pollution and physical inactivity, threatening London's economy, attractiveness and Londoners' health and quality of life.

Planned well, London's growth presents an opportunity to develop sustainability:

- Density and intensification supporting shorter journeys that can be walked or cycled; and improve the viability and efficiency of public transport.
- Investment from development and regeneration improving London's streets so as to overcome safety concerns and bring about a further shift to walking and cycling.
- New and renovated buildings and public spaces providing supporting infrastructure, such as cycle parking, shade, shelter and points of rest.
- The transition of land-uses associated with car use (for example, car parks) toward other uses.

Accordingly, through its policies and supporting planning mechanisms (such as guidance, assessments and local plans), the London Plan should encourage a major modal shift toward sustainable travel. This process is already underway, however recent trends of increased car use are concerning.⁴ The new London plan presents the opportunity to use planning and development control to accelerate this trend away from car use further and achieve the goals of the Mayor's Transport Strategy.

- We welcome the Strategic Approach supporting the Mayor's aim to shift journeys to walking, cycling and public transport (T1);
- We strongly support the inclusion and wording of the Healthy Streets policy (T2);
- We welcome and support the new more nuanced spatial approach to higher cycle parking where demand exceeds existing standards (T5);
- We strongly support the inclusion of policies in favour of car-free and car-lite development (T6);
- We welcome proposed mechanisms to assess and fund improvements to walking and cycling networks through new development directly, or indirectly, through planning obligations (T4, T5 and T9).

Detailed comments are given in the table below.

Specific comments

Paragraph / Policy Ref	Comment	Suggested wording and proposed change(s)
T1 – Strategic Approach	<p>Sustrans strongly supports the strategic approach, setting out how development plans and proposals should support (a) the delivery of the Mayor’s strategic target for 80 percent of all trips in London to be made by foot, cycle or public transport by 2041; and (B) the transport schemes set out in table 10.1, with the express exception of:</p> <ul style="list-style-type: none"> • Silvertown Tunnel • River crossings at Gallions Reach and/or Belvedere 	
10.1.1 – 10.1.5	<p>We welcome the positive supporting text in highlighting the need to reduce car dependency, make the most efficient use of finite street and road space and rebalancing the transport system towards walking, cycling and public transport.</p>	
T2 – Healthy Streets	<p>Sustrans strongly supports the inclusion of Healthy Streets as policy T2, for the priority this gives to walking, cycling and public transport and the mechanisms included in this policy to ensure that development delivers improved streets, walking and cycling networks.</p> <p>A - We welcome an approach that would see patterns of land use that reduce the need to travel by car, and facilitate shorter trips by walking or cycling.</p> <p>B – We strongly support the requirement for development plans to (1) promote and demonstrate the application of the Healthy Streets Approach and concomitant reduction in car dominance, ownership and use; and (2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle and travel on public transport. We are concerned</p>	

	<p>that a lack of definition of ‘essential vehicles’ leads to ambiguity and confusion.</p> <p>C – We strongly support the requirement for new and improved walking, cycling and public transport networks to be planned at an early stage in Opportunity Areas and other growth areas and incorporating the Healthy Streets Indicators as a mechanism to track delivery against this requirement and ensure quality in street design for sustainable modes.</p> <p>D – We strongly support the requirement for development proposals to: (1) demonstrate improvements against the Healthy Streets Indicators as a mechanism to track delivery and ensure quality in street design for sustainable modes; (2) reduce the dominance of vehicles both moving and stationary; and (3) be permeable by foot and cycle and connect to local walking and cycling networks and public transport.</p>	
10.2.4	Sustrans welcomes the description of the Healthy streets Approach and supporting aims and policies.	
10.2.8	We are concerned that this paragraph is particularly passive and makes no ask of development plans, or development decisions to reduce road danger toward the Vision Zero aim.	Explain how the Mayor expects development and the opportunities presented by London’s growth to contribute toward vision zero.
T3 – Transport Capacity	We welcome the approach outlined in policy T3 Transport capacity, connectivity and safeguarding; particularly that development plans develop effective policies and projects to support the sustainable development of London. We welcome safeguarding of the Walk London Network and Thames Path, including the provision to improve its alignment with the Thames. We believe the National Cycle Network Routes should be safeguarded. Sustrans is conducting a national review of the National Cycle Network and would	B 3) safeguarding the Walk London Network, the National Cycle Network and protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames.

	welcome engagement with Transport for London, the Greater London Authority in this process.	
Table 10.1	Sustrans broadly supports the transport schemes set out in table 10.1, with the express exception of: <ul style="list-style-type: none"> • Silvertown Tunnel • River crossings at Gallions Reach and/or Belvedere 	
T4 – Assessing and mitigating transport impacts	<p>Sustrans supports policy T4:</p> <p>A – Development Plans and development proposals should be integrated with current and planned transport access, capacity and connectivity, particularly for walking and cycling networks and the public realm.</p> <p>B – We welcome the additional detail regarding transport assessments, particularly the consideration of impact on walking and the cycle network. We strongly support embedding the Healthy Streets Approach in transport assessments.</p> <p>C – We support the appropriate mitigation of impacts identified in the transport assessment for walking and cycling through either direct provision of highway improvements or financial contributions</p> <p>D – It is critical that existing or planned active travel and public transport capacity is available to absorb any growth in demand as a result of development. Planning permissions, therefore, should be contingent on the provision of necessary public transport or active travel infrastructure.</p> <p>E – We strongly support the requirement for development to consider and mitigate the transport effects on public health and the supporting explanatory paragraph (10.4.3). However, we are concerned this does not have an enforcement mechanism.</p>	<p>B - The National Cycle Network should be included for consideration by Development Plans and development proposals in transport assessments.</p> <p>“E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be identified through the transport assessment process and mitigated in line with Policy T4 C and the Healthy Streets Approach.”</p>

<p>T5 – Cycling</p>	<p>Sustrans strongly supports Policy T5 Cycling.</p> <p>A – We support the requirement for Development Plans and development proposals to help remove barriers to cycling and create a healthy environment in which people choose to cycle. We support the inclusions of the London Cycle Design Standards into cycle parking policy (2) and believe this should apply to the policy (T5 A) in full. The use of such standards across all cycling infrastructure is critical. Evidence presented at the previous alterations to the London Plan demonstrated how poorly designed cycle parking was underused, despite high demand for cycle parking facilities.⁵</p> <p>We support B, C and particularly the pro-active approach to cycle parking standards identified in D, E and F.</p>	<p>A “Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle, in accordance with the guidance contained in the London Cycling Design Standards. This will be achieved through...”</p> <p>Include an indicative map of the Strategic Cycling Network according to current plans and the Strategic Cycling Analysis.</p>
<p>Table 10.2 – Minimum Cycle Parking Standards</p>	<p>Sustrans strongly support the inclusion of minimum Cycle Parking Standards within the plan. Cycle Parking is critical infrastructure. Not only does it support existing cycle demand (over 700,000 journeys a day) and a rapidly growing mode of transport into the future (8.8 percent growth between 2015 and 2016 alone) it helps to unlock suppressed demand. People will not cycle if they cannot be confident of a parking space at their destination, nor will they own a cycle if storage at home is a challenge. Secure storage is also important for sustaining those who already cycle; TfL’s 2012 Attitudes to Cycling survey found that 29 percent stop cycling altogether after a cycle theft.⁶ Secure and convenient cycle parking at home and at destinations is vital to support growth in cycling, in line with current trends and the aims of the Mayor’s Transport Strategy.</p>	

As a result, it is right to require minimum cycle parking standards of new development, both as infrastructure supplied within buildings to support sustainable travel and supplied through the public realm or financial contributions to cater for increased demand and activity associated with new development and London's growth. Given the Mayor's Transport Strategy aims, and this background rate of growth, we would expect a standard proportionate to the potential identified in TfL's analysis of cycling potential, ensuring that new development provides parking for every potential journey by bike, to absorb future growth beyond the timeframes of the Transport Strategy and more closely aligned with the expected lifecycle of the building.

- We strongly support the new approach to define an area for higher cycle parking standards in Figure 10.2, where existing demand is greatest and would fail to cater for future growth.⁷
- We welcome the commitment of the Mayor to support boroughs to adopt higher cycle parking standards (10.5.3); the mayor should require higher parking standards in: (i) the CAZ, particularly for City of London and Westminster, given their strategic role as major destinations for a large concentrations of journeys in Greater London; (ii) Opportunity Areas, particularly given Policy SD1 A 8 and their role in achieving higher active and sustainable mode shares than surrounding areas, and (iii) existing mini-Holland boroughs. We welcome the Mayor's support for higher parking standards with an emphasis on those developing Liveable Neighbourhoods.

	<ul style="list-style-type: none"> • We give Specific comment on cycle parking standards (see, Comments on Table 10.2) below. 	
T6 – Car Parking	We strongly support the strategic approach and policies toward car parking, in particular, we support A, B, H and I.	
T6.1 – Residential Car Parking	We support the approach to residential car parking set out in Policy T6.1.	
Table 10.3 – Maximum residential parking standards	<p>We welcome the standards’ more nuanced approach to car parking, particularly one that recognises the need for stricter parking standards where public transport, town centres and the central activities zone are more accessible as well as the need to design in sustainable travel in Opportunity Areas.</p> <p>We are concerned that the proposed residential car parking maxima for Outer London PTAL 2, O – 1 are above the current average levels of car ownership in these areas and would, therefore, enable an increase in ownership and use against the background existing rates of ownership.</p>	PTAL 0 – 2: up to 1 space per unit
T6.2 – Office Parking	<p>We welcome the approach set out in T6.2.</p> <p>B - We are concerned the language is too weak regarding well connected office developments and those in opportunity areas, where “office developments are <u>encouraged</u> to be car-free”</p> <p>We particularly support clauses:</p> <p>D - recognising the major negative impacts that would accompany more generous standards in Outer London and the requirement for suitable justification; and</p> <p>E – Requiring a more nuanced approach to more generous standards by boroughs than simple borough-wide, which</p>	

	would fail to reflect the varying accessibility, density and trip generating characteristics of areas within the borough.	
T6.3 – Retail Parking	We welcome the approach to assessing existing parking provision for retail development. Assessments of similar existing public provision should take account of the charging or timing regime of nearby retail centres in order to avoid facilitating generous parking standards. We also support the approach to optimising the use of existing parking arrangements to make most efficient use of land. As Transport for London’s Analysis of Cycling potential demonstrates, “almost half of all potentially cyclable trips are made for shopping and leisure purposes.” ⁸	
10.6.15	We welcome the explanatory paragraph demonstrating the nature short, switchable retail trips that could be walked or cycled and the corresponding need to reduce car parking provision, support Healthy Streets and liveable neighbourhoods.	
T7 – Freight and Servicing	Freight and Servicing trips are of particular concern because of their association with road danger (for example, from Heavy Goods Vehicles) and air pollution (approximately 59 percent of nitrogen oxides emissions from road transport sources are a result of heavy commercial vehicles, including buses). We welcome an approach to freight and servicing trips that seeks to reduce them, overall, and optimise vehicle kilometres associated with these trips. As such we welcome, Policy T7 and clauses A, C, D, G, H in particular.	Clause I should include TfL’s ‘Direct Vision Standard’ and reference the developing Star Rating scheme and HGV Safety Standard Permit Scheme.
T9 – Funding transport infrastructure through planning	We welcome the approach set out in Policy T9. A - We consider that cycling infrastructure is of strategic importance to warrant MCIL funding income. Achieving the Mayor’s Transport Strategy and unlocking some the major	D The Mayor will work with Transport for London, Government and other stakeholders to develop a effective, efficient and fair approach to Land

	<p>potential identified by TfL will require significant investment in streets. We cannot see a way of increasing the rate of delivery without increasing funding for cycling. While there is a significant amount of new infrastructure to celebrate, we estimate that it accounts for less than 1 percent of London's street network by length. For example, we now have 31 kilometres of segregated cycle lane for a population of approximately 8 million people. Denmark's capital, Copenhagen, has a network of 370 kilometres of segregated cycle lane serving a quarter of London's population – it has some of the highest cycling rates of any city in the world. There is a long way to go in improving London's infrastructure.</p> <p>B – support</p> <p>C – We strongly support the instruction to consider planning obligations for the funding of the London-wide cycle networks, in line with the Healthy Streets Approach. While we welcome the commitment to explore land value capture mechanisms in chapter 11 (11.1.13), we believe such mechanism should play a critical role in funding transport infrastructure improvements. It is well understood that land value increases with improved transport infrastructure, particularly, connections to employment centres.⁹</p>	<p>Value Capture to help fund strategic transport infrastructure and address the funding gap.</p>
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Comments on Table 10.2 – Cycle Parking Standards

All cycle parking standards are supported unless otherwise stated in the table below.

Use Class		Long-stay	Short-stay
A1	Food retail	-	-
	Non-food retail	We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 200sqm	-
A2 – A5	Financial and professional services; cafes & restaurants; drinking establishments; takeaways	-	-
B1	Business Offices	We welcome the implementation of the 2013 FALP evidence report with a standard reflecting a 19 percent mode share for the area of higher cycle parking standards (figure 10.2). However, central London has shown the fastest growth, with flows over the central London cordon having grown by 244 percent between 2000 and 2016.	-
	Light industry and research and development	-	-
B2 – B8	General industrial, storage or distribution	-	-
C1	Hotels	We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 15 bedrooms.	-
C2	Hospitals	We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 4 FTE.	-
C2	Care homes / secure accommodation	We are concerned that the proposed standard is less than the evidence 2013 report of 1 per 3 FTE.	-

C3 – C4	Dwellings (all)	<p>We strongly support the change to include 1.5 spaces per 1 bedroom unit to reflect the increasing density of households in London, as set out in the evidence report and make owning a cycle an option for all residents of new developments.¹⁰</p> <p>Sustrans also supports the inclusion of Student Accommodation in the definition of dwellings (C3) for the purposes of cycle parking standards.</p>	-
D1	Nurseries	The 2013 Evidence Report recommended 1 space per 7 FTE staff and 1 space per 8 students	-
	Primary Schools / Secondary schools / sixth form colleges	As above	-
	Universities and Colleges	-	We consider that this standard should be 1 space per 4 FTE students; in many universities, there is an undersupply of short-stay parking and addressing this through the delivery of new short-stay parking should be reflected in the standards.
	Health Care, including dentists	-	Welcome the increase in Short-stay parking to reflect the land-use
	Other (e.g. Library, Church)	-	-
D2	Other (e.g. Cinema, bingo, etc.)	The 2013 Evidence Report recommended 1 space per 7 FTE	-
	Sports (e.g. sports hall, swimming, gymnasium, etc.)		-

Sui Generis	-
Stations	<p>The plan should define more clearly the criteria by which station cycle parking should be determined. For example, this could be according to:</p> <ul style="list-style-type: none"> • Station capacity and service frequency (existing or planned demand) • Cyclable journey stages in the surrounding area, according to the Analysis of Cycling potential (potential demand) • Quantum of expected future growth in line with the Mayor's Transport Strategy expected outcomes (future potential demand)

Chapter 11: Funding the London Plan

Paragraph / Policy Ref	Comment	Suggested wording and proposed change(s)
11.1.33	<p>We welcome the Mayor's commitment to trial a more flexible approach to pay for road use beyond the current VED regime. We believe this should account for use (kilometres), air pollution and greenhouse gas emissions, and weight (as a proxy for danger). We do not support the hypothecation of Vehicle Excise Duty for roads only. Given the range of external costs motor-vehicle use places on the environment and human health Government should retain the flexibility to allocate this revenue to other services, for example, supporting other, health positive, modes of transport.</p>	

Chapter 12: Monitoring

Paragraph / Policy Ref	Comment	Suggested wording and proposed change(s)
<p>Table 12.1 – Key Performance Indicators</p>	<p>We welcome the proposed KPIs for</p> <ul style="list-style-type: none"> • Transport – Modal Share: Increasing mode share for walking, cycling and public transport (excluding taxis) towards the target of 80 percent by 2041; this should be broken down to short, medium and long-term targets. • Health – Active Travel: Positive trend in the 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). 	

References

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- ¹ **Greater London Authority** (2017) Healthy Streets for London: prioritising walking, cycling and public transport to create a healthy city
 - ² **Sustrans** (2017) Laying the Foundations for a Healthier London
<https://www.sustrans.org.uk/report-laying-foundations-healthier-london>
 - ³ **Transport for London** (2017) Residential car parking: part of the London plan evidence base
 - ⁴ **Transport for London** (2017) Travel in London 10, p. 21
 - ⁵ **SKM Colin Buchanan** (2013) Cycle Parking Standards: Evidence Report
 - ⁶ **Transport for London** (2012) Attitudes toward Cycling
 - ⁷ **Transport for London** (2017) Cycle Parking: part of the London Plan Evidence Base
 - ⁸ **Transport for London** (2017) Analysis of Cycling Potential 2016, p. 17
 - ⁹ **Transport for London** (2017) Land Value Capture
https://www.london.gov.uk/sites/default/files/land_value_capture_report_transport_for_london.pdf
 - ¹⁰ **Transport for London** (2017) Cycle Parking: part of the London Plan Evidence Base

Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute.

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