

DRAFT NEW LONDON PLAN

London Property Alliance
Respondent Number: 2730
Transport Cycling – Matter M85

M85 – Is Policy T5 justified and consistent with national policy, and would it be effective in helping to helping to achieve sustainable development?

1. As drafted Policy T5 is not fully justified and some aspects of it would not be effective. This particularly relates to the application of the proposed standards – especially for short-stay visitor parking – in smaller developments.

a) Are all of the requirements of Policy T5 necessary to address the strategic priorities of London, or do they extend to detailed matters that would be more appropriately dealt with through local plans or neighbourhood plans?
2. The proposed cycle parking standards extend to matters more appropriately dealt with in local plans. The Alliance **does not** object to the substantial increase in cycle parking standards to be applied to large new developments and supports continued modal shift in favour of cycling.
3. However the proposed standards are too detailed and too inflexible. This is exacerbated by the Mayor's Suggested Changes to Policy T5, especially to Part F. There is no strategic need to go into the level of detail proposed by Policy T5 in a strategic document; the Policy clearly sets a strategic direction to substantially increase cycle parking provision. Additional detail is unnecessary.
4. The requirements to provide 1 cycle parking space per 75 sqm of office development will require a significant space provision and will be difficult to achieve particularly on smaller development schemes, or those that envisage refurbishment and extension, rather than comprehensive redevelopment. In addition, taller buildings on smaller footprints often struggle to accommodate significant levels of bicycle parking at below ground levels. This should be acknowledged in the policy, with flexibility allowed for such schemes. In particular, these standards should be applied to net additional floorspace, not to existing buildings. It would not be in keeping with Good Growth principles to prevent the re-use, or extension, refurbishment and refurbishment of existing buildings because challenging cycle parking standards, targeted at new developments, cannot be achieved.
5. In this vein, the reference to 'all development proposals' should be amended in Part F. It is not practical for cycle parking requirements to be triggered whenever 'development' is proposed. Part F should be clarified so that it is clear cycle parking standards are triggered where there is an **increase** in floorspace that exceeds the size thresholds. This would prevent changes of use being prevented by cycle parking standards that are impractical to accommodate when there is no physical change proposed.

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6. The Alliance is concerned that the proposed approach to short-stay cycle parking is not always appropriate for the CAZ. Within much of the CAZ there is exceptional pressure upon the public realm to accommodate growing volumes of foot traffic. Considerable resources are being spent to remove unnecessary clutter and expand footways to accommodate this, to ensure that pedestrian movement is prioritised.
7. Whilst visitor cycle parking may be of some use in more suburban locations with less public transport accessibility, within the CAZ most trips are by public transport and started and completed on foot. In particular, visitor trips to retail and leisure destinations, such as Oxford Street, will generally be on foot.
8. Suggested response: We suggest that Policy T5 is amended as follows:

- a. With additional paragraphs to state:

“These standards should be applied flexibly to smaller scale development, particularly to changes of use or refurbishment / minor extension proposals where limited or no physical works are proposed.

Lower levels of short stay cycle parking will be acceptable within the Central Activities Zone where creation of additional on-street cycle parking would add to either visual cluster or pedestrian congestion.”

- b. The MSC to Part F should be reversed and the paragraph worded as follows:

“A minimum of two short-stay and two long-stay cycle parking spaces must be provided for all land uses in all locations with the exception of Class C3, C4 and Class A uses where the net additional overall floorspace created does not exceed the threshold specified in Table 10.2”

b) Are the minimum cycle parking standards set out in Table 10.2 justified?

See above.

c) Should the Plan allow local plans and neighbourhood plans to apply the minimum cycle parking standards flexibly to take account of local evidence?

9. The Alliance would support this approach; the detailed application of cycle parking standards should be considered at a local level.