

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

85.1 Under the GLA Act, the Mayor has a statutory duty to improve the health of Londoners and reduce health inequalities.¹ Policy T5 Cycling is therefore justified and necessary to improve the health and quality of life of Londoners, reduce emissions from transport and ensure limited road space is used efficiently as London grows.

National Policy

85.2 The approach set out by Policy T5 is also consistent with, supported by and necessary under the 2012 National Planning Policy Framework (NPPF). The 2012 NPPF sets out the need for the transport system *'to be balanced in favour of sustainable transport modes...'*². Paragraph 35 specifies that the location and design of developments should help to achieve this by *'...giv[ing] priority to pedestrian and cycle movements'*³ (with the 2018 NPPF identifying cycle parking as an example of the supporting infrastructure needed to do so⁴). Policy T5 encourages sustainable travel by providing sufficient cycle parking at origins and destinations and supporting the delivery of a high-quality network of routes that connect them.

85.3 Section 8 of the 2012 NPPF outlines the need to promote healthy communities. By supporting higher levels of cycling, Policy T5 works towards this objective through increasing physical activity and improving air quality. Given that cycling is a virtually emission-free and highly space-efficient mode, Policy T5 also contributes to the objective of reducing greenhouse gas emissions and congestion, consistent with the 2012 NPPF.⁵

85.4 The 2012 NPPF also identifies the importance of creating inclusive communities.⁶ Alongside Policy T2 Healthy Streets, Policy T5 aims to create street environments that are less dominated by cars and are attractive and more amenable to active travel, engendering more inclusive spaces. Policy T5 A2 further supports inclusivity by catering for adapted cycles, which is consistent with the requirement to *'consider the needs of people with disabilities by all modes of transport'*⁷.

Sustainable Development

85.5 There has been continued growth in the levels of cycling in London in recent years (see Figure 85.1 below), with new development playing an important role in continuing and accelerating this trend. An increase in cycle trips is also central to both the Healthy Streets Approach and achieving the 80 per cent active, efficient and sustainable mode share target set in Policy T1 of the draft Plan. This is

¹ GLA Act 1999, Section 41(4b)

² NLP/GD/03: DCLG, National Planning Policy Framework (NPPF), March 2012, paragraph 29

³ NLP/GD/03: DCLG, NPPF 2012, paragraph 35

⁴ MHCLG, NPPF 2018, paragraph 104

⁵ NLP/GD/03: DCLG, NPPF 2012, paragraph 30

⁶ NLP/GD/03: DCLG, NPPF 2012, paragraph 69

⁷ NLP/GD/03: DCLG, NPPF 2012, paragraph 35

necessary to secure sustainable transport outcomes as London’s population grows to a forecast 10.8 million by 2041.

- 85.6 The Policy will ensure that sufficient convenient, safe and secure cycle parking is provided in new development across different use classes, taking into account both future and potential demand, the investment planned to make cycling safer and more attractive, and the 80 per cent mode share target.
- 85.7 The ability to securely park a cycle at both the origin and destination of a trip is vital for enabling people to choose cycling for daily and spontaneous travel. With limited opportunities for additional cycle parking on the highway network, and a historic lack of provision in existing development, it is essential that new developments provide adequate cycle parking facilities so that people cycling are able to park off-street at a range of locations. It would not be possible to achieve the higher levels of cycling required as London grows if sufficient cycle parking is not provided, particularly given the longevity of developments and the difficulties of retro-fitting provision. This approach strikes a reasonable balance between the policy ambition and the need to cater for future residents, workers and visitors, rather than just today’s Londoners.
- 85.8 Part A1 of the Policy also sets out a requirement for new development, where applicable, to support strategic cycle routes (via direct infrastructure delivery or planning obligations), which are set out in more detail in the MTS. Sufficient quantity and quality of routes and cycle parking – alongside complementary measures that address other barriers to cycling⁸ – are vitally important to delivering continued growth in cycling.
- 85.9 As London’s population grows, the implementation of Policy T5 would also help deliver and secure a range of economic, social and environmental benefits, including:
- lower levels of congestion, allowing people and goods to move around the city more reliably;
 - released public transport capacity, which is particularly important during periods of peak demand, allowing more people to access workplaces and supporting continued employment growth;
 - better access to public transport, delivered by enabling residents living outside station walking catchments to cycle to and from stations;
 - improved public health outcomes, delivered through increased physical activity, reducing health inequalities and reducing Londoners’ risk of physical and mental health conditions;

⁸ Further detail on the delivery of a holistic package of measures to increase levels of cycling are set out in TfL’s Cycling Action Plan (2018).

- improved air quality and reduced carbon emissions, delivered through a shift away from more polluting modes, reducing the impact of new development on the environment, health and health inequalities;
- improved productivity for London businesses through reduced absenteeism,⁹ and economic benefits for local businesses through reducing traffic dominance and improving quality of place in high streets and town centres; and
- a more equitable transport network, giving more Londoners the confidence to choose cycling as an option for their daily journeys and enjoy the benefits of cycling as a healthy, low cost transport option. Changing the balance between use of motorised vehicles and cycles also has the potential to make walking more attractive as streets become more welcoming.

In particular:

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?

85.10 As identified above, Policy T5 will help to deliver strategic priorities in relation to sustainable development, such as encouraging active travel, improving health outcomes, improving air quality and reducing road congestion.

85.11 The provision of safe and attractive routes and sufficient cycle parking is a strategic issue for the London Plan, as an absence of cycling infrastructure in one borough can prevent trips being cycled from other boroughs. Without adequate infrastructure, some trips that could otherwise be cycled may be driven instead, which uses road space less efficiently, is more polluting, and potentially constrains new development by increasing road congestion, which, at a strategic level, cannot be feasibly mitigated.

85.12 The lack of cycling infrastructure also denies Londoners potential opportunities to improve their health through cycling. The Mayor's Transport Strategy (MTS) sets out how people in all parts of London – not just those in areas with higher existing levels of cycling – can meet the minimum recommended levels of physical activity through incorporating 20 minutes of active travel into their daily routine. Enabling more people to cycle is a key part of this, as cycling can cater for a wider range of trips than walking alone.

85.13 It is therefore necessary to ensure at a strategic level that new development provides sufficient cycle parking (for existing and future levels of cycling) and, where relevant, support the development of strategic cycling routes. The Policy

⁹ Employees who are physically active take 27 per cent fewer sick days than their colleagues - National Institute for Health and Care Excellence, 2012

sets out in appropriate detail what is required of new development to adequately support growth in cycling to meet London’s strategic priorities, as set out above.

- 85.14 The Policy requires cycle parking provision to be of sufficient quality to ensure it is fully used, with Part A2 requiring adherence to the London Cycling Design Standards. Provision that is difficult to access, inadequately spaced-out or insufficiently secure is not likely to be fully utilised. Parts B and C of the Policy require alternative means of providing sufficient cycle parking to be considered and secured where necessary, thus ensuring that the choice to cycle is not restricted by site-specific constraints.
- 85.15 The lack of cycling infrastructure at one end of a trip can prevent people cycling it. Setting out strategic requirements through the London Plan, rather than through local plans or neighbourhood plans, ensures a base level of consistency across boroughs, which is critical for the achievement of the sustainable transport outcomes and the 80 per cent mode share target set in the draft Plan. However, this does not reduce the role of local and neighbourhood plans to identify and plan for local routes and infrastructure.

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

- 85.16 Table 10.2 sets out the level of cycle parking provision for new development, taking into account different levels of cycle parking demand based on use class, potential length of stay, and propensity and potential to cycle in different parts of London. The standards ensure that all new development provides an appropriate level of cycle parking, both at origin and destination, and are necessary to support sustainable transport outcomes.
- 85.17 The standards for residential long-stay cycle parking aim to enable the majority of people living in a new development in London to own a cycle and store it at home. This approach prevents insufficient provision from forcing residents who might have otherwise cycled some of their trips to rely on other modes.
- 85.18 It is important to note that there is potential for increased levels of cycling across all areas of London, including areas in outer London. Even in locations where existing cycle levels are currently low, there are many short distance trips currently undertaken by car that could easily be made by cycling instead if the road conditions, as well as cycle parking, were suitable. Two thirds of car trips made by London residents are 5km or shorter and could be cycled within 20 minutes.¹⁰ The Mayor, through TfL, will continue to work to ensure that conditions for cycling are improved across all boroughs.
- 85.19 Cycle mode share is higher for commuting than for any other journey purpose, which has particular benefits for the city as a whole, compared to driving during the highest levels of congestion or using public transport when demand is at its peak.

¹⁰ Transport for London, Healthy Streets for London, February 2017

Cycle parking for employment uses is therefore important and supports cycling as a means of commuting.

- 85.20 It is essential that new office developments adequately support high levels of commuting by cycle as London’s workforce continues to grow. Other destinations must also provide sufficient cycle parking provision in order to enable higher levels of cycling, including short-stay cycle parking at retail uses. Analysis suggests that higher standards of provision are required for growth in areas where cycling levels are already higher. Analysis also suggests that shopping trips, especially those to town centres, are disproportionately represented among those that could potentially be cycled but are not currently.¹¹ This is reflected in higher minimum cycle parking standards, represented in Figure 10.2 of the draft Plan.
- 85.21 Further evidence supporting the standards in Table 10.2 is set out in both the Cycle Parking Standards supporting evidence report¹², published in 2013 as part of the Further Alterations to the London Plan (FALP), and the Cycle Parking evidence paper,¹³ published in December 2017 as part of changes to the cycle parking standards made since FALP.
- c) Should the Plan allow local plans and neighbourhood plans to apply the minimum cycle parking standards flexibly to take account of local evidence?**
- 85.22 As described above, Policy T5 Cycling is required to address strategic priorities in London, and any flexibility applied in local or neighbourhood plans should be within this context.
- 85.23 The standards set in Policy T5 take into consideration local factors. For retail and offices uses, the higher minimum standards (set out in Table 10.2) required in specified areas are based on evidence of existing and potential cycling levels in different boroughs and town centres.¹⁴
- 85.24 The setting of a strategic minimum level of provision in the draft Plan does not preclude local authorities from having the flexibility to apply higher local cycle parking standards through development plans. This will be supported by the Mayor where there is local evidence suggesting higher levels of cycling should be planned for.
- 85.25 It would be inappropriate for standards lower than Table 10.2 of the draft Plan to be applied through local plans or neighbourhood plans. This would result in inconsistent and inadequate base levels of cycle parking provision across different areas of London and potentially deter residents of other boroughs or neighbourhoods from making trips by cycle to those areas with lower provision.

¹¹ NLP/TR/010: Transport for London, Analysis of Cycling Potential 2016: Policy Analysis Report, March 2017

¹² SKM Colin Buchanan, Cycle Parking Standards: Evidence Report, November 2013

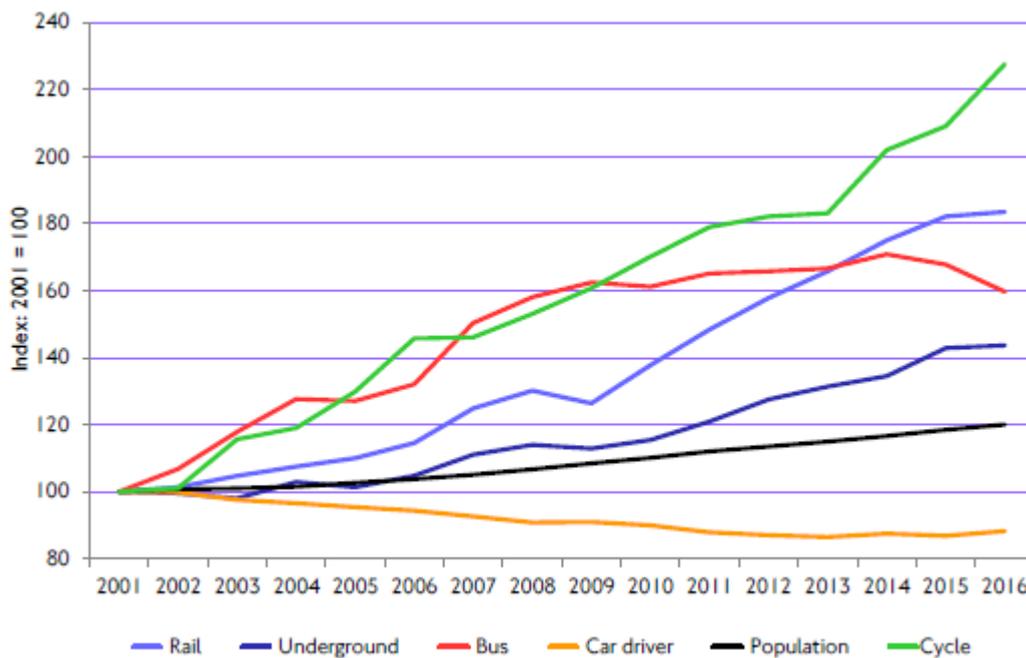
¹³ NLP/TR/004: Transport for London, Cycle Parking, December 2017

¹⁴ NLP/TR/004: Transport for London, Cycle Parking, December 2017

85.26 Where evidence shows that certain areas currently have relatively low levels of cycling¹⁵, this is likely to be due in part to insufficient quantity and quality of cycling infrastructure, which should be addressed over the Plan period through Local Implementation Plans, transport strategies and the implementation of Policy T5. This will enable cycling opportunities, which can contribute to improved health and wellbeing, in all parts of London. Responding to currently lower levels of cycling by providing less cycle parking – particularly for residential uses – risks permanently ‘locking in’ a historical approach to travel and street design (as well as potentially requiring expensive and logistically challenging ‘retro-fit’ options), preventing future increases in cycling levels and ultimately reducing sustainable travel choices as London grows.

Figure 85.1

Figure 2.5 Growth in journey stages on selected modes, 2001 to 2016.



Source: TfL City Planning, Strategic Analysis.

Source: *Travel in London Report 10*¹⁶.

¹⁵ The London Travel Demand Survey conducted by Transport for London provides borough level data about mode share and the volume and purpose of trips in London.

¹⁶ NLP/TR/005: Transport for London, *Travel in London Report 10*, 2017, page 31