

Draft Further Alterations to the London Plan 2014

Sustrans submission to the Greater London Authority

April 2014

Contents

Chapter two: London's Places	2
Chapter three: London's People	3
Chapter four: London's Economy	3
Chapter five: London's Response to Climate Change	4
Chapter six: London's Transport	4
Chapter seven: London's Living Spaces and Places	9
Chapter eight: Implementation, Monitoring and Review	9
Contact Details.....	9

Summary

Sustrans welcome the opportunity to comment on proposed further alterations to the London Plan. As a sustainable transport charity, we see that spatial planning make a significant contribution to our vision in which 60 per cent of journeys under five miles are made by foot or by bicycle.

Sustrans is a leading UK charity enabling people to travel by foot, bike or public transport for more of the journeys we make every day. We work with families, communities, policy-makers and partner organisations so that people are able to choose healthier, cleaner and cheaper journeys, with better places and spaces to move through and live in.

Chapter 6: London's Transport

Sustrans welcome the inclusion of information on the Mayor's Vision for Cycling, its projects and new guidance around the London Cycle Design standards throughout chapter 6, particularly around policy 6.9. It must be made clear to boroughs and developers consultants that the design standards are currently being updated and that the latest revised version must be adhered to.

Sustrans welcomes the improved revisions to the Cycle Parking standards, but question why the recommendations of extensive evidence gathering have not been included.

We support new river crossings for sustainable transport modes (6.4).

Sustrans are particularly concerned over relaxations to parking standards as a result of changes to Policy 2.8, 6.13 and Table 6.2 Parking for Residential Development. We request a seminar on this topic as part of the examination in public and are happy to provide a further briefing on our opposition.

Specific Comments

Chapter two: London's Places

Realising the benefits of 2012

POLICY 2.4 THE 2012 GAMES AND THEIR LEGACY

Policy 2.4 C c: recommend explicit reference to paragraphs 6.35, 6.35a and 6.38.

Sustrans welcomes the obligation placed on new development within the London Legacy Developer Corporation's control to contribute to the delivery of transport infrastructure (particularly walking and cycling). However it should go further to ensure that cycling and walking is actively catered for throughout the site by making explicit reference to paragraphs 6.35, 6.35a and 6.38, all of which highlight the methodology for increasing walking and cycling.

Outer London

POLICY 2.8 OUTER LONDON: TRANSPORT

Policy 2.8 A h: recommend rejecting added clause: 'and guidance which reflects greater dependence on the private car'.

Sustrans strongly objects to its inclusion on the grounds that this is both defeatist for such a long-view policy document and that it will actively counter many of the Mayor's objectives and ambitions. It will also erode recent gains in reducing private car-use in outer London. Across London car use is declining at a faster rate than elsewhere in the UK. This is especially true for young people. From the 1995/7 to the 2005/7 there has been a drop in the amount of average annual car mileage of 2,246. ⁱ

Specifically, providing infrastructure to facilitate driving runs counter to the intentions of Policy 2.8 A e, f, g and i. Further, the results of this change will contravene a number of the Mayor's objectives regarding deprivation, health inequalities, air pollution and climate change, as captured in Policy 1.1 B b and objectives 1, 2, 5 and 6 (p. 32) and KPI 13 (p. 294).

Paragraph 2.36: recommend the rejecting added text for the reasons outlined above.

Strategic industrial locations

Paragraph 2.85: we note the inclusion of text around the release of industrial land. This seems to imply displacement of employment from within the catchment of public transport nodes. Further, the protection of these locations allows for supply chains to concentrate and cluster. With the release of this land to provide housing there is a risk that it will break up localised supply chains – as was experienced at the Olympic site ⁱⁱ – and lead to more and further journeys by light-goods vehicles (work related travel) and private-cars (driving to and from the place of work). In these instances, the transport assessments cited in Policy 6.3 would therefore need to also understand the development's transport impact on activities displaced from a previous land-use.

Strategic network of green infrastructure

POLICY 2.18 GREEN INFRASTRUCTURE: THE MULTIFUNCTIONAL NETWORK OF GREEN SPACES

Policy 2.18 C: Sustrans is concerned that the removal of 'meet' and its replacement with 'help address' is a watering down of commitments to improve areas deficient of regional or metropolitan parks. Green spaces are vital in tackling London's health outcomes, particularly for enabling Londoners to engage in physical activity. TfL's recent action plan

on *improving the health of Londoners* demonstrates just how important physical activity is to reducing health risks and the cost of care. ⁱⁱⁱ Many of London's green spaces provide traffic-free environments wherein families feel confident and comfortable to cycling, to achieve healthier lifestyles (increased physical activity).

Case Study

Over the past year and a half Sustrans has been delivering cycle training and activities to encourage cycling with school pupils and their parents. Traffic and road danger remains a major deterrent. This is backed up by numerous studies^{iv}. Green spaces provide somewhere to learn, to practice and to enjoy cycling and thus play a vital role in meeting the Mayor's Transport Strategy (MTS) targets for cycling and reducing health inequalities.

Policy 2.18 F a: Sustrans welcomes the expectation that boroughs take a strategic approach to create, protect, enhance and manage their green infrastructure.

Paragraph 2.88: Similarly to the previous comment, we note and welcome the extended description of green infrastructure. We support the additional link drawn between the beneficial outcomes of green infrastructure and stated policies of the plan.

Chapter three: London's People

Improving health and addressing health inequalities

POLICY 3.2 IMPROVING HEALTH AND ADDRESSING HEALTH INEQUALITIES

Policy 3.2 C: Sustrans is concerned at the addition of wording 'for example'. We consider that this removes the obligation to complete a Health Impact Assessment (HIA). Without formally and systematically accounting for the health impact, through an HIA, developments that have negative impacts may be approved. Sustrans recommends rejecting this change.

Paragraph 3.8: alterations to this paragraph have evidently been made to clarify the role of HIAs in policy 3.2 C. The obvious question that needs answering is, how will we know 'a development or plan is anticipated to have significant implications for people's health and wellbeing' without first conducting a HIA? And how, without an HIA, will this decision be reached transparently? However, we support the highlighted role of borough's public health teams in understanding the likely impact of a development.

Paragraph 3.19: akin to our comments on paragraph 2.85 we note the same expectations on the release of industrial land for housing around transport nodes and again point toward the implications for employment related journeys.

Chapter four: London's Economy

Paragraph 4.2: includes the addition of 'development, growth and investment'. It is assumed this is referring to economic growth, but there is need of more specificity. Does the addition refer to sustainable development as defined in the Glossary (p. 351), and thus what kind of growth would this require and how will this be measured

Economic Context

POLICY 4.1 DEVELOPING LONDON'S ECONOMY

Policy 4.1 A a2: Sustrans supports the added commitment to maximise the benefits from new infrastructure to secure sustainable growth and development. However this requires clarification. While Sustainable Development is defined in the glossary, we note that there is no definition of 'sustainable growth' or 'growth' to guide interpretation of this statement.

Paragraph 4.4A: While Sustrans recognises the benefits of new infrastructure it is equally important to maintain and improve existing infrastructure. It should read: 'investment to

improve existing or create new infrastructure is critical to securing sustainable growth...’ We also note that the health-economic and environmental benefits of infrastructure go unmentioned in the final sentence of paragraph 4.4A. This should be rectified.

Chapter five: London’s Response to Climate Change

Though dealt with in the following chapter, Transport makes a significant contribution to carbon emissions. The omission of any reference to sustainable transport (walking and cycling) in this section should be amended given that a goal of the MTS is “Reducing transport’s contribution to climate change, and improving its resilience.”

Chapter six: London’s Transport

Connecting London

POLICY 6.4 ENHANCING LONDON’S TRANSPORT CONNECTIVITY

Policy 6.4 B d: the addition of a line on providing new river crossings is concerning for its lack of clarity. While it follows a commitment to improve public transport we feel the term is somewhat ambiguous. It must clarify for which transport mode(s) new river crossings will be provided. Suggest adding ‘for sustainable transport modes’.

POLICY 6.9 CYCLING

Strategic

Policy 6.9 A a: Sustrans welcomes the reaffirmed commitment of the Mayor to deliver a network of cycle routes across London and supports this statement as a clear indication to boroughs, developers and investors as to the strategic value of cycling to London’s transport mix.

Policy 6.9 A c: further update: “fund the transformation of three outer London borough town centres, Enfield, Kingston and Waltham Forest, into cycle friendly ‘mini-Hollands’.”

Planning Decisions

Sustrans strongly supports the inclusion of the word ‘convenient’ with regard to cycle parking. However we recommend the addition of a further clause to the text, which states that parking facilities are provided according to best practice identified in the London Cycling Design Standards (or subsequent revisions). The supplementary *Cycle Parking Standards: Evidence Report* highlights how poor quality cycle parking provision in residential developments has led to their underuse. Of those surveyed, 20 per cent indicated there was designated parking provided that they did not use. Furthermore, 78 per cent stored their bikes in their homes or garages (49%), or on their balconies or in gardens (29%). The evidence stresses the need for good quality cycle parking in new developments, a provision that the planning process can best provide for. ^v In the Netherlands, where cycling accounts for up to a third of all journeys, experience has demonstrated that planning and building regulations must set the standard for cycle parking. A relaxation of building regulations in 2003 led to sub-standard provision. As a result, the building regulations were reinstated in 2012. ^{vi}

Policy 6.9 B c: Sustrans welcomes the added wording that places an expectation on developments to ‘contribute positively’ to an integrated cycling network for London. We are concerned however that this wording is somewhat weak. Our recommendation is that the wording be revised to read, “integrate into a cycling network for London by providing infrastructure (both on and off highway) that is safe, comfortable, attractive, coherent, direct and adaptable, designed in accordance with, and to best practice outlined in, London Cycling Design Standards (or subsequent revisions).”

Policy 6.9 B d: Sustrans strongly supports the alterations to this policy as a more explicit method by which policy 6.9 B c can be implemented in the near-term, specifically by relating to the projects being delivered as part of the Mayor’s Vision for Cycling in London.^{vii}

Policy 6.9 B e: we support the inclusion of text added here. However it seems intuitive that any mention of planning obligations should be cross referenced with Policy 8.2.

Policy 6.9 C a: the inclusion of the expectation that DPDs should facilitate the completion of specific cycle route projects is strongly supported.

Policy 6.9 C b: changes to this policy are welcomed. Sustrans recommends that this reflect the Mayor’s plans for a ‘cycling revolution’. We urge the changing of the final clause, from “in areas of high usage or operational stress” to “in areas of high cycling potential, local demand, high usage or operational stress.” Through this approach, the Mayor’s Cycle hire scheme will play a continued role in unlocking suppressed demand for cycling.

Policy 6.9 C c: given the extensive alterations to this policy and the surrounding paragraphs, Sustrans strongly urges Policy 6.9 C c to be revised to reflect the level of expectation for future cycle route quality in London. We recommend the addition of the clause, “designed in accordance with, and to best practice outlined in, London Cycling Design Standards (or subsequent revisions).”

Policy 6.9 C d: noting the previous constrictive language and framing of the problem “where local circumstances allow”, we welcome and strongly support the more positive and active phrasing proposed by these alterations.

Paragraph 6.33: Sustrans supports the greater detail added to this paragraph. We would like to see more of a justification for increasing this mode of transport by demonstrating what more cycling means for the city. For instance, it is a more efficient use of road space that provides door-to-door personal travel. It has the potential to meet over 20 per cent of London’s transport mix.^{viii} Its additional benefits include reduced air pollution,^{ix} reduced operational-stress on public transport^x and improved public health outcomes across the population.^{xi}

Paragraph 6.34: as an indication to planners, developers and investors that cycling is of strategic value, we are pleased to see the inclusion of a paragraph describing the projects arising from the *Mayor’s Vision for Cycling in London*. We suggest the removed text – describing the extent of the Mayor’s cycle hire scheme and that boroughs may continue to identify sites for cycle hire and implement cycle parking – simply needs updating. Cycle hire continues to play an important role as does cycle parking installed by the boroughs.

Paragraph 6.34A: we support the inclusion of further information on the Mayor’s actions to improve cycle safety.

Paragraph 6.35: Sustrans strongly supports the alterations to paragraph 6.35. It adds further detail explaining how developments must contribute to creating a high quality environment for cycling both on and off highway. It should reference the guidance provided by the London Cycling Design Standards (or later revisions) as is included in 6.35a.

Paragraph 6.35a: the alteration distinguishing between two types of cycle parking, and their implicit type, is most welcome. We support this addition and that of the reference to the London Cycling Design Standards (or subsequent revisions). Furthermore, changes regarding cycling are significant enough to warrant mention of cycling in Policy 6.3 Assessing effects of development on transport capacity. Notably through 6.3 C: “Workplace and / or residential travel plans should be provided for planning applications exceeding the thresholds in, and produced in accordance with, the relevant TfL guidance. Transport assessments must consider both the strategic and local potential role for cycling.”

Paragraph 6.36: changes to this paragraph are supported as they provide greater flexibility. We recommend the addition of the line '(or subsequent revisions)' after mention of the London Cycling Design Standards. Sustrans is aware these standards are currently undergoing review to be adopted in summer 2014.

POLICY 6.10 WALKING

Overall it is felt the policies and guidance toward walking are much weaker than that of cycling and can benefit from much of the same language and guidance. Sustrans is also aware that TfL are producing best-practice design guidance for pedestrians. Mention of this document must be made to indicate its arrival to planners, developers and investors that a new standard of accessible, safe and convenient pedestrian environment is also expected.

Policy 6.10 C d: Alterations to this policy should go further. Developments provide the opportunity to greatly improve cycling amenity (as demonstrated by alterations to sections on cycling) and so they should, too, for walking. Sustrans strongly recommends the alteration is reworded to: "and that new developments actively improve pedestrian amenity as described in the forthcoming TfL pedestrian design guidance (or subsequent revisions)."

Paragraph 6.37: while minor alterations have been made to this paragraph, we note that the role of walking is somewhat underplayed. Walking is vital in creating viable alternatives to the private car as it is the link between stations, bus stops, cycle parking and the door-step.^{xii} Sustrans recommends the inclusion of text to this effect, "To this end, the quality and safety of London's pedestrian environment should be improved to make the experience of walking more pleasant. Through this, walking can play a greater role as a viable alternative to both the private car and short trips on public transport. Walking underpins the city's public transport system, as often the only mode for moving between platforms, bus stops, cycle parking, cycle hire and one's destination."

POLICY 6.11 SMOOTHING TRAFFIC FLOW AND TACKLING CONGESTION

Policy 6.11 A: it is unclear as to how DPDs and Local Implementation Plans are to implement the recommendations of the Roads Task Force report. Ultimately smoothing traffic flow and tackling congestion requires reducing the need to travel or promoting travel by more efficient means like walking cycling and public transport (i.e. mixed used development, transit oriented developments, car free developments). We recommend the inclusion of the aims of the roads task for report, as stated in alterations to paragraph 6.39, listed in order of priority. This would give clearer guidance to planners and developers and weighting to the text of policy 6.11 A.

Policy 6.11 B i: Sustrans supports alterations to include the London street-types framework. However the application of the framework in practice is as yet unclear.

Paragraph 6.39: we welcome and support alterations to this paragraph that see the removal of 'improving traffic journey time, reliability and predictability'. Too great a focus has been given to these measures in recent years at a cost to the wider appreciation of the needs of other road users whose value and importance is not captured by these three indicators. We support the inclusion of text on the developing Road Task Force work. This indicates how this work will be prioritised through its three aims and is a useful signal to planners, developers and investors of how London will change and develop over the coming years.

Paragraph 6.39A: Sustrans is concerned at the proposed removal of text to the effect of 'reduce traffic levels' in the opening sentence. Reducing traffic is a key component of improving air quality (reflected in changes to Policy 8.2), road congestion and increasing sustainable transport use in London. On air quality alone, 4,300 premature deaths are linked to air pollution each year; the burden can also be represented as a 6 month loss of life expectancy from birth for each Londoner. Pollution from road traffic, and particularly from diesel fumes, is the most significant cause of London's poor air quality. 86 per cent

and 87 per cent of the worst areas in the country for nitrous oxide (NO₂) and particulate matter (PM₁₀), respectively, are in London.

POLICY 6.13 PARKING

Policy 6.13 C: In conjunction with Policy 2.8, this represents a significant relaxation of parking standards at a time when Londoners, particularly the young are driving much less. Further, this policy change undermines the original text and its stated aims. This would allow parking guidance to go unused even in areas of high PTAL score, discouraging public transport use. Along with the London Cycling Campaign, we suggest replacing the words ‘should be the basis for considering’ with the words ‘must be applied to’. We request a seminar on this topic as part of the examination in public.

Paragraph 6.43: Sustrans would like to see greater expectation of the use of the ATOS (access to opportunities and services) tool by boroughs to help develop a clearer sense of a developments transport need and impact. Recommend: “At a neighbourhood level, boroughs should use the ATOS tool in order to better understand what services are accessible in a local catchment area, by both walking and cycling.”

Table 6.2 Car parking standards

PARKING FOR RESIDENTIAL DEVELOPMENT

This table proposes very significant increase in car parking provision (33%, 50% and 100% (less than 1 to 0-1)) in residential developments. There is substantial risk this will encourage households to use two or more cars with consequent impacts on local congestion and pollution, while also discouraging cycling and walking. TfL analysis found 54 per cent of potentially cyclable trips were located around metropolitan town centres in outer London. With the risks outlined above in mind, we strongly oppose this change and request further justification of these changes.

TABLE 6.3 CYCLE PARKING MINIMUM STANDARDS

Sustrans welcomes improvement in these standards since the previous version. However, we are unsure as to why the recommendations of the SKM Colin Buchanan *Cycle Parking Standards: Evidence Report*^{xiii} (the evidence report) have not been included? The evidence report clearly points to a demand for improved quality and quantity of cycle parking across the city. Coupled with the infrastructure measures of the kind identified in the £913m Mayor’s Vision for Cycling, it is clear that cycle parking has a major role in facilitating an increase in cycling toward the 5 per cent target. Security is a major barrier to both increasing and maintaining cycling. Key findings from TfL’s most recent Attitudes to Cycling survey (2012) included:

- 40 per cent report security concerns prevent them cycling more often
- 22 per cent of victims cycle less after a theft
- 29 per cent – nearly a third of victims – stop cycling all together after a theft

Cycle parking standards will have a crucial long-term role in supporting the Mayor’s aims for cycling.

Across all land-uses using area based standards (e.g. 1 per 200sqm), there must at the least be at least a minimum requirement (e.g. minimum 2 spaces) as recommended in the evidence report. This is especially true given the negotiable nature of the standards when read in conjunction with paragraph 6A.13.

Land Use	Sustrans’ comment
B1 business offices	The FALP proposal equates to a c16% mode share. The evidence summary points toward parking standards that reflect c19% mode

	share, which is still below to the Mayor’s target of 20% for central London. The standard should be revised upward to reflect the recommendations of the evidence report.
C2 Student Accommodation	Strongly support the alterations.
C3-C4 dwellings (all	The evidence report states “Based on survey responses, the demand for existing residential cycle parking is currently lower than the total number of bicycles owned, as half of cyclists reported keeping their bicycle within their home and a further 30% within their garden, shed or balcony. This reflects a lack of good quality cycle parking at residential sites, where security is of primary importance. ... the current provision is so lacking it results in non-use. Additionally, in the Attitudes to Cycling report, 20% of respondents cited not using the parking provision available to them at home due to security concerns.” ^{xiv} High quality residential cycle parking is crucial to support the desired growth and encouragement of cycling, as outlined in previous comments and the quote above. Residential parking is lacking in quality, insecure or inconvenient and thus goes unused. We reject these changes and endorse the recommendations of the most recent cycle parking evidence report.
D1 nurseries / schools (primary secondary)	Of the primary and secondary schools Sustrans works with, the average mode share of 16.5 per cent equates to a parking standard of 1 space per 6 students. Not the proposed 1 per 8.
D1 universities and colleges	Universities experience some of the highest levels of cycling and thus student short-stay parking should be increased. In this regard we support the Just Space’s prior call for a standard of 1 per 4 FTE students, given the movements of students between campuses and buildings throughout the course of the day good quality short-stay spaces should be of greater priority.
Stations	On this point, we endorse comments submitted by the London Cycling Campaign: “Absence of clear standards for rail station risks developments, such as London Bridge, providing inadequate levels of cycle parking at inconvenient locations. As a minimum requirement of the London Plan all station developments must formally agree cycle parking provision, as well as access and signage with Transport for London and the local authority before planning permission is granted. The comparison of cycle parking at London mainline stations with that in the Netherlands is striking with Dutch stations such as Rotterdam, Utrecht and Amsterdam offering 7000 cycle parking spaces each compared to 2000 in total at all of London’s main stations. We note that Network Rail sought to minimize the amount of cycle parking to be provided at London Bridge by referring to old TfL guidance while acknowledging that new guidance had been provided.”

Paragraph 6A.13: we support the inclusion of additional cycle parking specifications but are concerned it will allow developments to negotiate their way out of providing good quality solutions.

Chapter seven: London's Living Spaces and Places

Place Shaping

POLICY 7.1 LIFETIME NEIGHBOURHOODS

Sustrans work with communities in London has demonstrated the importance of considering the principle of lifetime neighbourhoods. As such, we support the inclusion of text defining this concept (paragraph 7.4A) and its reference to in Policy 7.1 A.

Sustrans supports alterations to paragraphs 7.4, 7.6 and 7.6B.

Chapter eight: Implementation, Monitoring and Review

POLICY 8.2 PLANNING OBLIGATIONS

Policy 8.2 E: Sustrans welcomes the inclusion of air quality and social infrastructure in guiding the use of planning obligations, however we feel this is too weak considering the extent of the air quality problem in London. Suggest: "should take into account how they will tackle climate change and air quality, social infrastructure.

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ⁱ Le Vine, S and Jones, P. (2012) One the Move: Making sense of car and train travel trends in Britain

ⁱⁱ **Raco, M and Tunney, E.** (2010) *Visibilities and invisibilities in urban development: small business communities and the London Olympics 2012*, Urban Studies

ⁱⁱⁱ **TfL** (2014) Improving the health of Londoners: transport action plan

^{iv} London specific examples of this literature include: **TfL** (2012) Attitudes toward Cycling; **TfL** (2010) Analysis of cycling potential; **Aldred, R.** (2010) Cycling Cultures

^v **SKM Colin Buchanan** (2013) Cycle Parking Standards: Evidence Report

^{vi} **Bicycle Dutch** (11 July 2013) Parking your bike at home - available online at:

<https://bicycledutch.wordpress.com/2013/07/11/parking-your-bike-at-home/>

^{vii} **Mayor of London and TfL** (2013) Mayor's Vision for Cycling in London: an Olympic legacy for all Londoners

^{viii} **TfL** (2010) Analysis of Cycling Potential

^{ix} **TfL** (2014) Board Paper: Cycle Vision Portfolio - available online at:

<http://www.tfl.gov.uk/cdn/static/cms/documents/board-20140205-part-1-item06-cycling-vision-portfolio.pdf>

^x **TfL** (2014) Board Paper: Cycle Vision Portfolio - available online at:

<http://www.tfl.gov.uk/cdn/static/cms/documents/board-20140205-part-1-item06-cycling-vision-portfolio.pdf>

^{xi} **TfL** (2014) Improving the Health of Londoners: transport action plan

^{xii} **TfL** (2011) Central London Rail Termini: Analysing Passengers' onward Travel Patterns (p. 30)

^{xiii} **SKM Colin Buchanan** (2013) Cycle Parking Standards: Evidence Report

^{xiv} **SKM Colin Buchanan** (2013) Cycle Parking Standards: Evidence Report (p. 27)