

# The London Plan – Consultation draft replacement plan

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Sustrans response

November 2009

compiled by Greg King

**Sustrans is the UK's leading sustainable transport charity.**

- Our vision is a world in which people choose to travel in ways that benefit their health and the environment.
- Our mission is to work everyday on practical and imaginative solutions to the transport challenges affecting us all.

As a sustainable transport charity, our aim is to transform the UK's transport system and culture so that:

- the environmental impacts of transport, including its contribution to climate change and resource depletion, are significantly reduced
- people can choose more often to travel in ways that benefit their health
- people have access to essential local services without the need to use a car
- local streets and public spaces become places for people to enjoy.

In order to achieve this transformation, our objectives are:

- to make local environments safe and more attractive for walking and cycling
- to support and encourage individuals to make more sustainable and healthy travel choices, through motivational and information programmes
- to influence policy and practice by communicating the outcomes of our own work, and the benefits of sustainable and healthy travel, to a wide audience.

Sustrans is the charity behind the award winning National Cycle Network, Safe Routes to Schools, Bike It, TravelSmart, Active Travel, Connect2 and Liveable Neighbourhoods, all projects that are changing our world one mile at a time.

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# Introduction and summary of recommendations

Sustrans welcomes the opportunity to respond to the draft London Plan. Overall, Sustrans supports the direction for London that the draft plan sets.

In particular, Sustrans agrees with the Mayor's vision that over the years to 2031 – and beyond, London should:

*“excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21<sup>st</sup> century, particularly that of climate change.”*

In this response Sustrans highlights the policies in the draft replacement plan that it supports and believes are particularly important for tackling London's challenges.

Sustrans then puts forward a number of recommendations for the development of the final replacement plan. Sustrans believes that the recommended additions and amendments that it sets out are essential to ensure that the plan adequately fulfils the Mayor's goals for London.

A summary of Sustrans recommendations are as follows:

- **Inclusion of greenways in Policy 6.9 Cycling** - The development of greenways in London is now an established programme of work, carried out by Sustrans in partnership with Transport for London, the London Boroughs and many other agencies. The omission of greenways from the draft replacement plan is an inconsistency with the draft Mayor's Transport Strategy, which includes a proposal for, *“Enhanced cycle links to the Olympic Park by 2012 and the development of a wider network of Greenways across London...”*. Sustrans recommends that a specific reference to greenway development is made in replacement plan Policy 6.9 'Cycling', and is accompanied with an indicative map of the London greenways network.
- **Inclusive design principles must pertain to transport** - Sustrans fully supports the policy that, *“The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design”*. Sustrans recommends that it is specified in the replacement plan that 'development' includes transport infrastructure development, in order that street and highway schemes meet the needs of the whole of society.
- **Better streets through traffic reduction and reallocating road space** -Sustrans supports many of the measures set out in the draft replacement plan under the theme of 'Better Streets'. Traffic volume is a key determinant of public realm quality and Sustrans recommends that a policy on managing traffic volumes is included. The current omission of this is an inconsistency with the draft Mayor's Transport Strategy, which includes the proposal, *“Seeking to manage car access to residential areas, through physical or design measures, to create pleasant and safer walking environments”*. In addition Sustrans recommends the reallocation of road space from general traffic to facilitate sustainable and space efficient modes.
- **Firmer direction on traffic speeds** – Since reducing traffic speeds improves safety for all road users and increases the appeal and uptake of sustainable travel modes, Sustrans recommends that the transport strategy should promote the reduction of traffic speeds, and the expansion of 20mph speed limits, particularly in residential areas.

- **Alternatives to aviation expansion** - The South East of England has some of the world's most heavily trafficked skies and its residents suffer considerable aviation based noise and air pollution. Sustrans recommends that the replacement plan opposes additional airport runway capacity provision and promotes alternatives to air travel.
- **Car parking policy and car-free developments** - Since the availability of car parking is a major determinant of travel mode, Sustrans recommends that the London Plan should promote using car parking provision to influence travel mode and should promote car-free developments, where appropriate.

## Key elements of the draft replacement plan that Sustrans supports

Sustrans agrees with many the Mayor's ambitions for London. Many of the policies and proposals in the draft replacement plan set out key principles in making London more sustainable. This section highlights these.

### The commitment to public health

Sustrans supports the focus on public health set out in the draft London Plan, as expressed in Policy 3.2:

*"The Mayor will take account of the potential impact of development proposals on health inequalities within London. The Mayor will work in partnership with the NHS in London, the London Health Commission and the London boroughs to reduce health inequalities and improve the health of all Londoners."* (Policy 3.2)

Sustrans fully supports the intention to improve public health through improving access to green spaces and encouraging walking and cycling, as expressed in the plan text:

*"It [the London Plan]..aims to..improve access to green and open spaces and leisure facilities (including using the planning system to secure new provision), support safe and sustainable transport systems (including walking and cycling), reduce road traffic casualties, create places for children to play and ensure there is a good array of local services."* (page 64)

In addition, Sustrans supports the intention to minimise the negative health impacts caused by air and noise pollution in London, particularly that caused by transport, as expressed in Policy 7.14 and 7.15:

*"A The Mayor will work with strategic partners to ensure that the spatial, climate change, transport and design policies of this plan support implementation of his Air Quality Strategy to achieve reductions in pollutant emissions and public exposure to pollution."* (Policy 7.14)

*“Boroughs and others with relevant responsibilities should have policies to:  
a. reduce the adverse impact of noise through the distribution of noise-making and noise-sensitive uses, and in highway management and transport policies...” (Policy 7.15)*

## Reducing the contribution to climate change

Sustrans supports the Mayor’s reaffirmation of his commitment to the 2025 carbon dioxide emission reduction target, as expressed in Policy 5.1.

*“The Mayor seeks to achieve an overall reduction in London’s carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. It is expected that regional agencies, London boroughs and other organisations will contribute to meeting this strategic reduction target, and the GLA will monitor progress towards its achievement annually.” (Policy 5.1)*

## Reducing the need to travel

Sustrans fully supports the Mayor’s ambition to reduce the need for Londoners to travel, as expressed in Policy 6.1:

*“The Mayor will work with all relevant partners to encourage the closer integration of transport and development by:  
a encouraging patterns of development that reduce the need to travel, especially by car – boroughs should use the standards set out in Table 6.1 to set maximum car parking standards in DPDs  
b seeking to improve the capacity and accessibility of public transport, walking and cycling, particularly in areas of greatest demand..  
g supporting measures that encourage shifts to more sustainable modes and appropriate demand management  
i promoting walking by ensuring an improved urban realm.” (Policy 6.1)*

Sustrans agrees that integrating transport and land use planning and shaping the pattern of development to influence the location, scale, density, design and mix of land uses is hugely important. Reducing the need to travel and the length of journeys will be beneficial individually and collectively, by tackling congestion and overcrowding and reducing the impact of travel on people’s lives. Particularly over the longer term, as London’s population is set to grow, perhaps the best option - environmentally and economically – is simply to reduce the need for people to travel longer distances.

## Focus on cycling

Sustrans supports the focus on developing cycling in London, including the reaffirmation of the long-term cycle growth target, as expressed in Policy 6.9:

*“The Mayor will work with all relevant partners to bring about a significant increase in cycling in London, so that it accounts for at least 5 per cent of modal share by 2026” (Policy 6.9)*

Sustrans agrees that the benefits gained from higher levels of cycling – including congestion reduction, reduced greenhouse gas emissions, improved air quality and public health – warrant cycling being singled-out as a priority in the London Plan.

# Sustrans recommendations for the replacement London Plan

As set out in the previous section Sustrans fully supports many of the Mayor's ambitions for London. Sustrans believes that in order for these and other ambitions to be fulfilled, elements of the plan need to be taken further or amended.

These recommendations and others are set out in this section.

## Inclusion of greenways

Sustrans believes that greenways should be included as an element in Policy 6.9 'Cycling'. The development of greenways in London is now an established programme of work, carried out by Sustrans in partnership with Transport for London, the London Boroughs and many other agencies. To date, greenway networks have been identified across almost all London boroughs for development and promotion over the coming years. These networks have undergone consultation with thousands of groups and individuals and their delivery has been prioritised by managing authorities.

The omission of greenways from the draft replacement plan is an inconsistency with the draft Mayor's Transport Strategy. Greenways feature in the draft Mayor's Transport Strategy under the 'cycling revolution' theme and the development of greenways in London is included in Proposal No. 53:

*"The Mayor, through TfL, and working with the boroughs and other stakeholders, will deliver improvements to cycling infrastructure and training to support the cycling revolution, including:...*  
c) Enhanced cycle links to the Olympic Park by 2012 and the development of a wider network of Greenways across London..." (Proposal No. 53 of the draft Mayor's Transport Strategy)

Sustrans believes that the development of a good quality greenways network across London is particularly important for delivering the Mayor's ambition for a cycling revolution. Cycling is still a minority activity in the capital, with most Londoners never getting on a bike<sup>1</sup>. The most significant deterrent to cycling is fear of traffic; over two-thirds of Londoners do not think that cycling is a safe way to travel around London<sup>2</sup>. Despite this, research also shows that for a large proportion of non-cyclists, cycling does have an appeal from an environmental, health and enjoyment point of view. About 90 percent of Londoners think that it is healthy and good for the environment and over three-quarters agree that cycling is enjoyable<sup>3</sup>. Because greenways respond to both peoples' concerns about the safety of cycling in traffic and the positive perceptions of cycling as a healthy, fun activity they are key in facilitating a greater uptake of cycling. In Outer London particularly, where levels of cycling are currently low, but where there is a wealth of green spaces, greenways could play a central role in encouraging new people onto their bikes.

As well as featuring in the draft Mayor's Transport Strategy, greenway development is consistent with other policies in the draft replacement plan, as set out below:

- Greenways contribute directly to the ambitions set out in Policy 2.18, 'Strategic network of open spaces', in particular the intention that development proposals should:

*"encourage the linkage of green infrastructure to the wider public realm to improve accessibility for all and develop new links, including Green Corridors and Green Chains and the innovative use of street trees" (Policy 2.18).*

- The development of greenways across London is consistent with the intention to address health inequalities (London Plan Policy 3.2). In particular, greenway development ties in with the following statements:

*“It [the London Plan]..aims to..improve access to green and open spaces and leisure facilities (including using the planning system to secure new provision), support safe and sustainable transport systems (including walking and cycling), reduce road traffic casualties, create places for children to play and ensure there is a good array of local services.” (page 64)*

*“The Mayor will support the delivery of new and improved facilities for sport, walking, cycling, play and other forms of physical activities, including maximising opportunities associated with the 2012 Games and their legacy”. (page 64)*

- Greenways encourage people to walk and cycle more and so the policy is consistent with draft London Plan Policy 6.1 ‘Integrating Transport and Development, in particular the statement that:

*“The Mayor will...encourage the closer integration of transport and development by:.. g. supporting measures that encourage shifts to more sustainable modes and appropriate demand management” (Policy 6.1).*

Annual user monitoring on the National Cycle Network consistently shows that greenways encourage uptake of cycling and that many walk and cycle trips replace car journeys. Monitoring on a newly upgraded section of the Thames Cycle Route in 2008 found that almost a quarter of cyclists were new or returning to cycling and that 16 percent started using the route more often since it was upgraded<sup>4</sup>.

- Greenways contribute to the development of ‘An inclusive environment’ (draft London Plan policy 7.2), by providing an environment which is safe for vulnerable cyclists. As such, greenways are a form of cycling infrastructure development that, *“can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances”* (draft London Plan policy 7.2).

**Sustrans recommendation: The London Plan should reflect Proposal No. 53 of the draft Mayor’s Transport Strategy, by including specific references to developing greenways in London. This should include:**

- **Specific references within Policy 6.9 ‘Cycling’, including appropriate directives to deliver greenways under each sub-heading, ‘Strategic’, ‘Planning decisions’, and ‘LDF preparation’.**
- **A London Greenways map, to match and complement the route maps currently in the draft plan (Map 6.2 ‘Cycle Super Highways’ and Map 6.3 ‘Strategic Walking Routes’) [Sustrans has included a GIS table of the London greenways priority network with this submission for inclusion in the replacement plan]**

**In addition, Sustrans recommends that specific reference to greenways is made in Policy 2.8 ‘Green infrastructure: the network of open and natural spaces’, and Policy 3.2 ‘Addressing health inequalities’, to reflect the access and health contribution that greenways make.**

## Inclusive design principles must also pertain to transport

Sustrans fully supports the intention to develop inclusive environments in London, as expressed in Policy 7.2:

*“The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design”. (Policy 7.2)*

In particular, Sustrans supports, the statement that:

*“Development proposals should meet the highest standards of accessible and inclusive design and should demonstrate that they meet the principles of inclusive design so that developments:  
a. can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances...”. (Policy 7.2)*

Sustrans believes that within Policy 7.2 ‘An inclusive environment’ it should be clarified that ‘development’ includes transport infrastructure development. Looking at cycling specifically, it could be argued that much of the cycle infrastructure development in London to date has failed to achieve high standards of inclusive design, since the demographic profile of cyclists in London is highly unrepresentative of Londoners overall. Roughly twice as many cycle journeys are made by men than women<sup>5</sup>, and whilst levels of cycling rose significantly since 2000 among working-age people, the number of cycle trips made by children and young people declined between 2001 and 2006/07<sup>67</sup>. This is despite the fact that expenditure on cycle infrastructure development significantly increased in this period. Sustrans believes that it must be made explicit in this policy that inclusive design is needed in transport schemes as well as other developments.

**Sustrans recommendation: It should be clarified that principles set out in Policy 7.2 ‘An inclusive environment’ pertain to transport infrastructure development as well as other types of development.**

## Better streets through traffic reduction and reallocating road space

Sustrans supports many of the measures set out under the theme of ‘Better Streets’ (beginning on page 152), such as the inclusion of policies focused on cycling and walking. However, Sustrans believes that this section of the plan should include policies to reduce traffic speeds and volumes on London’s streets. The current omission of these is an inconsistency with the draft Mayor’s Transport Strategy.

The draft MTS sets out the Mayor’s ambitions to improve urban realm and improve walking and cycling conditions, including through managing traffic volumes in residential areas, in Proposal No.s 53 and 59:

*“The Mayor...will deliver improvements to cycling infrastructure and training to support the cycling revolution, including:...*

*g) Delivering road enhancements to make cycling easier and safer, including managing car access to residential areas, through physical or design measures, to create pleasant and safer cycling environments” (Proposal No.53 of the draft Mayor’s Transport Strategy)*

*“The Mayor...will improve the walking experience by enhancing the urban realm and taking focused action to ensure safe, comfortable and attractive walking conditions, including:...*

*g) Seeking to manage car access to residential areas, through physical or design measures, to create pleasant and safer walking environments” (Proposal No.59 of the draft Mayor’s Transport Strategy)*

Sustrans believes that these principles should also be reflected in the London Plan. A key determinant of the quality of the built environment and the appeal of an urban area for active travel is

the level of traffic. Guidance, including Manual for Streets (DfT, 2007) and the London Cycling Design Standards (TfL, 2005), promotes traffic volume reduction measures as the first priority in seeking to facilitate more walking and cycling.

There is a growing body of evidence of the impact of transport policy on social and community well-being as well as individuals health. Numerous studies have shown that lower motor traffic levels are associated with significantly higher levels of social interaction<sup>8</sup>, and that in urban areas that are conducive to walking, cycling and outdoor play, people are more likely to know their neighbours, participate politically, trust others and be socially engaged. By prioritising walking and cycling over private car use within urban areas, transport policy can make a vital contribution to social cohesion, neighbourhood revitalisation and community well-being.

**Sustrans recommendation: Under the ‘Better streets’ theme, a policy should be included to reduce traffic volumes in residential areas by managing access through physical or design measures.**

Sustrans believes that a key means of improving streets for walking and cycling, which should be reflected in the replacement plan is road space reallocation from general motor traffic to these modes.

Looking at cycling specifically, Sustrans believes that to provide a good quality cycling environment on busier distributor roads there is frequently no adequate alternative to providing dedicated cycling space. This usually requires the reallocation of road space from motorised vehicles.

A good example is the recent highway alterations on Blackfriars Bridge. The removal of a general traffic lane enabled the provision of good quality cycle lanes, which delivered significant safety improvements. Additionally, it allowed for the pavement to be widened, thus improving the pedestrian experience.

Road space re-allocation measures include: introducing traffic-free transport corridors for cycling and walking; introducing priority lanes for cyclists and public transport; pavement widening; intersection treatments to improve safety for cyclists, as well as pedestrians; parking restrictions and enforcement and raised crossings. Generally, these measures all aim to make access by sustainable and public transport choices simpler and more convenient than access by car.

This approach is supported by public health advocates. In 2007, the National Institute for Health and Clinical Excellence (NICE) issued guidance on physical activity and the environment which offered national evidence-based recommendations on how to improve the physical environment to encourage physical activity. This includes measures to re-allocate road space to active travel modes.

**Sustrans recommendation: The replacement plan should promote road space reallocation to sustainable modes where appropriate**

## Firmer direction on traffic speeds

In addition to traffic volumes, traffic speed is a key determinant of the appeal of an urban environment for walking and cycling. Reducing the speed of traffic is noted as the second priority for improving streets in both Manual for Streets (DfT, 2007) and the London Cycling Design Standards (2005).

Sustrans believes that the London Plan should reflect this principle by providing guidance on speed limits in London, including promoting the expansion of 20mph speed limits. Sustrans supports the recommendation of the London Assembly in the recent report, *Braking Point: 20mph Speed Limits in*

London, that funding should be made available to pilot borough-wide speed limit reductions on residential streets<sup>9</sup>.

A recent study into cycle safety found that the introduction of 20mph limits on residential roads could produce a 50% reduction in pedal cyclist killed and seriously injured casualties<sup>10</sup>. In addition to improving safety for all road users, lower traffic speeds is also a key measure in encouraging a greater uptake of active travel modes, particularly cycling<sup>11</sup>.

**Sustrans recommendation: The London Plan include a policy promoting the reduction of traffic speeds, and the expansion of 20mph zones, particularly in residential areas.**

## Alternatives to aviation expansion

Sustrans notes the Mayor's position on airport runway capacity, as expressed in the plan text:

*"The Mayor does not wish to prevent people from flying or undermine London's competitive position, and he does recognise the need for additional runway capacity in the south-east of England"*.  
(Connecting London, page 152)

Sustrans opposes the provision of additional airport capacity in the London area. The South East of England already has some of the world's most heavily trafficked skies and its residents already suffer considerable aviation based noise and air pollution. The UK generates more flights than any other European country. A fifth of all international air passengers worldwide are on flights that arrive or leave from UK airports. With reference to the Mayor's commitment to cut CO<sub>2</sub> emissions 60 percent by 2025, further increase in aviation capacity in the southeast is wholly inconsistent with the pressing need to reduce greenhouse gas emissions, and the increase in emissions from air travel would threaten to overwhelm the benefits derived from limitations of emissions in other areas.

It is widely recognised that in order to adequately reduce greenhouse gas emissions from aviation, there must be constraint of the number of flights. As the Mayor's Climate Change Action Plan points out, *"there are no significant, available or emerging alternatives to existing airframe/engine design or fuel source"*, and, *"Lead times for research and development are particularly long in the aviation industry (often several decades) given technological complexity and safety concerns"*.<sup>12</sup>

Since dramatic changes in aeroplane technology are unlikely to be available in the short to medium term, there is a need to reduce demand for air travel. Sustrans believes that the replacement plan should oppose airport expansion and that different set of principles must be defined in relation to aviation, focused on reducing the number of flights to and from airports in the southeast (particularly short-haul) and promoting the alternatives.

**Sustrans recommendation: The London Plan should state oppose additional airport runway capacity provision in London and the southeast of England.**

## Car parking policy and car-free developments

Sustrans believes that the guidance on car parking in the draft replacement plan should be amended to set clearer direction on car parking policy.

As is set out in Manual for Streets (200), *"The availability of car parking is a major determinant of travel mode"*. Accordingly, Sustrans believes that section 6.1 of the replacement plan ('Car parking standards') should set out more clearly the importance of car parking provision in achieving the Mayor's objectives in relation to the cycling revolution, public health and congestion relief.

The draft Mayor's Transport Strategy recognises the role of car parking in achieving transport behaviour change: "*The Mayor... may consider managing the demand for travel through pricing incentives (such as parking charges or other charging regimes) in order to meet the overall objectives of the transport strategy...*" (Proposal No.129 of the draft Mayor's Transport Strategy). Sustrans believes that that it would be appropriate for the draft London plan to highlight the role of parking availability, as well as pricing, in managing travel demand.

Sustrans supports the inclusion of the note about residential parking that, "*All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit*". Further to this, Sustrans believes that the replacement plan should promote, where appropriate, the provision of car-free developments.

'Carfree development', a design concept which originated in Germany and Austria in the early 1990s, incorporates a traffic-free residential environment which is designed around movement by non-car means.

There are now numerous neighbourhoods on mainland Europe, designed as car-free. They deliver economic benefits, by requiring less land for car parking and thereby allowing the construction of more dwellings for any given area. The lower levels of car trips associated with car-free developments contributes to congestion relief.

Given the low levels of car ownership in London, relative to the rest of the UK, the high levels of public transport accessibility, as well as the improving provision of cycle infrastructure, Sustrans believes that car-free developments should be promoted in the capital.

**Sustrans recommendation: The London Plan should promote using car parking provision to influence travel mode and should promote car-free developments.**

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<sup>1</sup> Cycling in London, Transport for London, October 2008.

<sup>2</sup> Cycling in London, Transport for London, October 2008.

<sup>3</sup> London Travel Report 2007, Transport for London, 2008.

<sup>4</sup> The National Cycle Network Route User Monitoring Report To end of 2008, Sustran, June 2009.

<sup>5</sup> Travel in London, Transport for London, 2009

<sup>6</sup> London Travel Report 2007, Transport for London, 2008

<sup>7</sup> London Travel Report 2006, Transport for London, 2007

<sup>8</sup> including, Livable Streets, Donald Appleyard, University of California Press, 1981

<sup>9</sup> Breaking point: 20mph speed limits in London, London Assembly, April 2009.

<sup>10</sup> Analysis of police collision files for pedal cyclist fatalities in London, 2001 – 2006.

<sup>11</sup> London Cycling Design Standards, Transport for London, 2005.

<sup>12</sup> Action Today to Protect Tomorrow: The Mayor's Climate Change Action Plan, Mayor of London, Feb 2007.