

City Plan 2040 - Regulation 19 draft, TfL comments

Gavin McLaughlin [REDACTED]

Wed 6/5/2024 4:56 PM

To: Planning Policy Consultations <PlanningPolicyConsultations@cityoflondon.gov.uk>

Cc: [REDACTED]

📎 1 attachments (543 KB)

City Plan 2040 Reg 19 TfL response.pdf;

THIS IS AN EXTERNAL EMAIL

Dear City of London planning colleagues,

Thank you for giving Transport for London (TfL) the opportunity to comment on the City of London’s Regulation 19 Proposed Submission Draft Local Plan.

Please find attached our comments Letter.

We wish you all the best concluding the plan making process. Feel free to come back to me or my team via spatialplanning@tfl.gov.uk with any questions or clarifications.

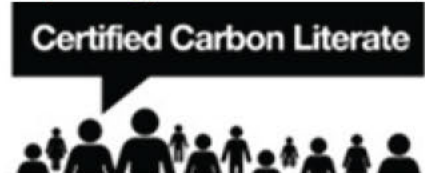
Best regards,

Gavin McLaughlin MSc; MA; MRTPI
Spatial Planning | City Planning

Construction Logistics Planning (CLP) - Advanced, CIHT/TfL-accredited course

PLEASE CONFIRM ALL MEETINGS BY CALENDAR

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process.



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City of London Corporation
LocalPlan@cityoflondon.gov.uk

4 June 2024

Dear Sir/Madam,

Re: City Plan 2036: Regulation 19 Proposed Submission Draft Consultation

Thank you for giving Transport for London (TfL) the opportunity to comment on the City of London's Regulation 19 Proposed Submission Draft Local Plan.

Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by Places for London to reflect TfL's interests as a landowner and potential developer.

Local plan policies and site allocations should be developed in line with relevant London Plan policy and support implementation of the Mayor's Transport Strategy (MTS).

In particular, it is important that local plans support the Healthy Streets Approach, Vision Zero and the overarching aim of enabling more people to travel by walking, cycling and public transport rather than by car. This is crucial to achieving sustainable growth, as in years to come more people and goods will need to travel on a relatively fixed road network.

The MTS and London Plan Policy T1 require all new development to support strategic sustainable and active mode shift including the Mayor's target for 95 per cent of central London journeys to be by walking, cycling and public transport by 2041.

We therefore welcome policies in the draft Local Plan which support shifting journeys including deliveries and servicing trips to sustainable modes, apply the Healthy Streets Approach through use of the TfL Pedestrian Comfort Guidance, and comply with London Plan car and cycle parking standards. We also welcome clear requirements for developer contributions toward active travel and public transport infrastructure where appropriate.

The Sustainable Transport, Walking and Cycling London Plan Guidance (LPG), published in November 2022 provides additional detail on the preparation of development plans to be in line with Chapter 10 of the London Plan. We suggest that you refer to this LPG in the final version of this plan. We welcome the inclusion of maps of planned improvements to the City's walking and cycling networks in the Plan, as recommended by the LPG.

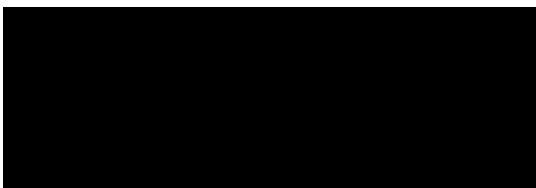
Overall, we appreciate the majority of our previous comments have been incorporated in this draft. We have further comments and suggestions included in Appendix A.

We would like to again highlight the exceptional usage of TfL's cycle hire scheme within the City of London. From 2021 to 2023, the City recorded the highest average daily usage per docking station of any local authority in London.

To further enhance this success, we suggest mapping existing TfL cycle hire and strengthening policy support in the plan for further expansion and support of our cycle hire network. This would significantly benefit the plan prior to adoption.

We look forward to continuing our work together in developing the local plan. We will continue work closely with GLA colleagues to help deliver integrated planning and make the case for continued investment in transport capacity and connectivity to unlock further development and support future growth in the City and across London.

Yours faithfully



Josephine Vos
London Plan and Planning Obligations Manager | City Planning
Email: [REDACTED]

Transport for London



Appendix A: Specific suggested edits and comments
Note: The page numbers correlate to those included within the document, not the PDF page numbering.

Section	Page	Previous Comments	New page number (in PDF doc)	Reg 19 Final Comments
Strategic Policy S1 (Healthy and Inclusive City)	28-29	We appreciate the addition of "public realm improvements" to section 12 of this policy. It would be helpful if this policy referenced the Healthy Streets approach, as a methodology for developers to assess the quality and healthiness of proposed public realm. This would tie in with section 2 where the design of buildings and public realm in relation to health is referenced.	16 - 17	We appreciate the addition of public realm improvements to the section. Healthy Streets is mentioned extensively, including the Healthy Streets indicators diagram from the MTS at Figure 8 and references to implementation of neighbourhood Healthy Streets Plan at pages 156, 166, and 174.
Strategic Policy S2: Safe and Secure City	46	There is no mention in this policy of transport safety. The City should use this policy to promote increased safety on the City's roads and public transport network, particularly for people walking and cycling. We strongly advise that this policy references the Mayor's Vision Zero, which aims to eliminate deaths and serious injuries on London's streets by 2041.	38	The policy has taken in to account our previous recommendations with specific reference to Vision Zero in Section 3 under reasons for policy: 'Ensuring a safe and secure City requires close cooperation between the City Corporation, neighbouring boroughs... the Mayor of London taking into account the Mayor's Vision Zero Action Plan to eliminate deaths and injuries on city streets'.
Policy SA3 (Designing in Security)	47, 49	The approach taken, to minimise the impact of counter-terrorism measures on public realm and pedestrian permeability, is supported. While this is positive, the policy could go further in suggesting that engaging street furniture and the use of trees,	43	Our previous response outlined the need for the policy to reference counter-terrorism measures can include street furniture and plants. This has been addressed; the new policy states at Part 3 that 'where non-integrated HVM is shown to be

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		planters and benches could help reduce the impact of Hostile Vehicle Mitigation (HVM) measures.		necessary, consideration should be given to the use of trees, planters and benches to reduce its visual impact.'
Policy CV4 (Hotels)	90	It is pleasing to see that walking, cycling and public transport modes are being promoted in respect of hotel development, in paragraph 5.3.21. This policy could go further in advocating infrastructure for operational electric vehicles at hotel developments. However, it should also be noted that pick-up/drop-off facilities for taxis, coaches and service deliveries should be limited to operational needs only in line with London Plan policy T6.4.	103	We welcome the policy that pick-up/drop-off facilities for taxis, coaches and service deliveries should be limited to operational needs only in line with London Plan policy.
Strategic Policy S8 (Design)	102-103	There is a positive focus around pedestrians in Policy S8. However, this should not be to the detriment of other active travel modes including cycling. Section 2 of the policy should be clearer in the level of prioritisation for pedestrians versus cyclists, as these different modes often require separation within public space. Relatedly, segregated cycle routes should be more strongly promoted within the City of London and more explicitly in this policy document. The current lack of segregated routes in the area needs	123	We welcome that our previous recommendation to prioritise both walking and cycling has been addressed in point 10 of Sustainable Design. We welcome that TfL Cycleways will be prioritised in the network of existing and new cycle routes as mentioned on pg 174 and Figure 11 (pg 175).

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		<p>addressing, as many of the City's current cycle routes are poorly segregated and signed. We would like to see a commitment from the City of London to back TfL Cycleway schemes, and use of the New TfL cycle route quality criteria to create and sign new cycle routes, including within new development sites as they come forward, and at and along adjacent junctions and streets beyond individual site boundaries.</p> <p>Additionally, streets are not just places of movement, but places where people want to spend time and engage in various activities. As previously requested, it would be helpful to reference the Healthy Streets Approach here so that developers holistically consider the need for increased active travel, as well as providing a quality public realm where people are encouraged to stop, rest and socialise. This could be included under the 'Experience' sub-heading.</p>		
Policy DE2 (Design Quality)	107-108	<p>The reference to enhancing pedestrian permeability is positive. However, this policy could go further to state the need for new developments to consider all forms of active travel, and to promote travelling by public transport. New development should particularly consider the</p>	132	<p>We appreciate that the transport comments we previously made when this policy was called 'New Development' have been addressed in other relevant parts of the plan.</p>

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		needs for cyclists, to reduce the barriers to cycling in line with Policy T5 of the London Plan, by for example providing adequate cycle parking for all cycle types and providing cyclist facilities (e.g. showers and lockers).		
Policy/ DE3 (Public realm)	111-112	The approach towards pedestrian permeability is supported; providing accessible, quality and legible walking routes. Whilst it is already mentioned in paragraph 6.3.16, it may be beneficial to refer to TfL's Pedestrian Comfort guidance within this policy, to better embed the approach. We are pleased that paragraph 6.1.36. has been changed in response to our previous feedback, to state that TfL's Legible London signage is the adopted system for wayfinding.	123	Although this policy has not taken on board our specific previous recommendations, the plan clearly embeds the PCL and Legible London approaches elsewhere and no further changes are needed.
Strategic Policy S9 (Transport and Servicing)	122	The changes to this policy since the regulation 18 version have been made in line with our previous feedback and are strongly supported. In particular, we are pleased to see the mention of safeguarding strategic infrastructure projects in section 1, and reference to foot and bicycle deliveries in section 4.	150	As previously advised, we would recommend that in part h of part 4, requirement of cycle promotion plans is removed as Travel Plans should play a key role to support active travel in new developments. Use of cycling promotion plans along with Travel Plans creates confusion that Travel Plans do not promote and support cycling.

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		<p>We appreciate the paragraphs following this policy, stating that the City of London will work with TfL to review bus routing and frequency, as well as prioritising investment in accessibility improvements to Underground and DLR stations. This is supported, and we look forward to continuing our working partnership on these projects.</p> <p>Cycling Promotion Plans (incorporated within Travel Plans)</p> <p>Section 4 of the policy refers to Cycling Promotion Plans (as well as Policy VT1, section 3, and paragraph 6.1.18.). As mentioned in our response to the City of London's Planning Obligations SPD (dated 10 December 2020), TfL is not supportive of the requirement for Cycling Promotion Plans. Whilst it is pleasing to see an emphasis placed on the importance of encouraging people to cycle, we do not believe this plan is necessary in addition to Travel Plans, which should include information on all active travel modes, including cycling. Requiring a separate plan to deal with cycling suggests that the purpose of travel plans are to deal with the</p>		

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		<p>vehicular impacts of development, which is minimal in the City of London context due to the high PTAL throughout, causing very few not to travel by walking or public transport.</p> <p>Rather, we suggest developers are encouraged to provide a Travel Plan with an active travel focus, which should include cycling promotion strategies. This will allow broader consideration of all active travel modes, including walking, running, wheelchair use, and potentially scooting (depending on the outcome of forthcoming trials).</p>		
<p>Figure 7: Proposed Street Hierarchy</p>	124	<p>The 'London Access' streets in figure 13 do not fully reflect the Transport for London Road Network (TLRN), as the A10/A1213/A3 corridor (Bishopsgate, Gracechurch Street and King William Street) is not presented as such on the map. Currently, this road is classified as 'City Access', and therefore paragraph 6.2.9. wrongly asserts that these are managed by the City Corporation.</p> <p>Therefore, we suggest that the map's road classifications are changed to reflect the A10 being 'London Access'; or that the definitions for both 'London Access' and 'City Access' roads are</p>	153	<p>As requested previously, the London Access streets layer has been explained and clarified further at Table 1 and Paragraph 10.1.2 on page 152 to reflect the TLRN with TfL as highway authority as the A10/A1213/A3 corridor (Bishopsgate, Gracechurch Street and King William Street) and it is now presented as such on the map on the following page, albeit with a bespoke 'London Access' definition.</p> <p>Again, we would prefer that the map's road classifications and associated definition and explanation are simply changed to reflect the A10's</p>

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		amended to reflect the A10's TLRN status. It must be noted that this road is an important north-south connection in the City of London, particularly for bus services.		TLRN status. Though satisfactory on balance, the 'London Access' definition focuses on through traffic almost exclusively when the A10 is an important north-south connection to and from the City of London, particularly for bus services and cycling, and the east-west Lower and Upper Thames Street corridor is also a Cycleway and provides access to many key local City destinations.
Policy VT1 (The impacts of development on transport)	125-126	Section 1 of this policy should reference the Mayor's Vision Zero. We are pleased that safety is mentioned, however referencing Vision Zero policies would better embed highway safety associated with development. It is pleasing to see that Construction Logistics Plans have been included in section 4, for both major developments and refurbishments.	155 – 157	Following the recommendations in our previous response, this policy now mentions that development proposals must have positive impact on highway safety, which we welcome.
Policy VT3 (Vehicle Parking)	129-130	We wholly support the car-free approach taken by the City of London. It is pleasing that all off-street car parking facilities are required to have EV charging points, as stated in section 4. We would like to clarify whether this refers to active charging facilities only, or would passive charging facilities be policy-compliant? TfL would be supportive of all	161	The text in part 4 of Policy VT3 can be amended All off-street non-residential car parking facilities bays must be equipped with active electric vehicle charging points usable from the outset , to enable all vehicles used in the City to be electric and avoid any confusion regarding residential car parking.

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		spaces having active charging facilities, to enable all vehicles used in the City to be electric.		The relevant London Plan policy is expressed at T6 parts G and H; T6.1 (Residential) part C 'At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces'; T6.2 (Office) part F "Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces.;" and T6.4 (Hotel) part C "All operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles, including active charging points for all taxi spaces."
Policy VT4 (River transport)	130	TfL is supportive of proposals to increase the passenger and freight transport by river, in line with Policy SI 15 of the London Plan.	162	No Comment.

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<p>Strategic Policy S10: Active Travel and Healthy Streets</p>	<p>133-134</p>	<p>Changing the title of Strategic Policy S10 to include 'active travel' is supported as this encompasses a greater range of healthy, active modes such as running and scooting, which are becoming increasingly popular commuting modes.</p> <p>The second bullet point of this policy has been modified to request "nearly all property entrances" to be within 250m of the cycle network. The addition of the word 'nearly' seems to weaken the policy, making it unclear what level of cycle network access would be acceptable across the City. We would like clarification to understand the reasoning behind this modification. Is this part of the policy based on a calculation, and have the implications been fully understood, e.g. in relation to trip attractors and high-rise density? Whilst this point is made, we are supportive of the City's ambition to exceed TfL's strategic density for cycle routes in the authority.</p>	<p>164</p>	<p>We welcome the update to 'the 250m point' we previously raised. The policy is strong in strategic transport terms.</p> <p>We suggest an addition to S10 part 1 adding our cycle route criteria, as follows: 'Applying the Healthy Streets Approach and New cycle route Quality Criteria in development proposals and improvements to public realm'.</p> <p>Sections 10.7.0 to 10.7.3 ('Reason for the policy') seem very robust in relation to the Healthy Streets Approach and indicators and the MTS.</p>
<p>Policy AT 1: Pedestrian Movement, Permeability and Wayfinding</p>	<p>135-136</p>	<p>TfL is supportive of this policy, and the changes since the Regulation 18 stage. However, we suggest adding that "Minimum pavement widths</p>	<p>168-169</p>	<p>Our previous request to explicitly refer to the Pedestrian Comfort Guidance for London has been addressed, which we welcome.</p>

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		<p>should accord to TfL's Pedestrian Comfort guidance" in addition to section 2.</p> <p>To reinforce the ambition for safer pedestrian environments, we strongly recommend stating that development proposals must conform to Vision Zero policies.</p> <p>We are pleased that a list of proposed walking improvements are included in paragraph 6.3.13, which includes TfL schemes. The Fleet Street/Ludgate Circus and Monument improvements are part of TfL's Safer Junctions programme, which should therefore be referenced in this section.</p> <p>It is positive to see reference to Pedestrian Comfort Levels in 6.3.16, which helps to promote positive, spacious development of the pedestrian environment. This section could reference TfL's guidance document, which can be found here: http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf.</p>		<p>Our previous emphasis of specific Safer Junctions is not explicitly referenced but our involvement in certain improvements and highway authority over certain routes is well reflected. The annotation of Monument Junction at Figure 1.1 on page 175 clearly signals the need for major improvements there to ensure cyclist safety.</p> <p>The list of highway improvements due to be delivered by 2030 at page 170 includes routes north-south from Blackfriars Bridge to Farringdon via Ludgate Circus and London Bridge to Liverpool Street via Bishopsgate including Monument Junction as 'in partnership with TfL', which is welcome.</p> <p>Whilst we acknowledge the likelihood of improvements to routes east-west from Farringdon to Aldgate via Smithfield and the Barbican and Fleet Street to Aldgate via Bank and the City Cluster, including Ludgate Circus by 2030 through developer funded highway works and some modest signals, footway and crossing</p>

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				<p>improvements, addition to the reference to partnership with TfL in improving Fleet Street to Aldgate, as we currently have no major scheme planned or strategic highway upgrade funding allocated for the corridor, we also request language referring to 'use of City Corporation funding and section 278 works' or similar.</p> <p>We are aware of a significant highway capacity modelling study led by City Corporation transport officers currently investigating the potential for cycle lanes, crossing improvements and footway widening along the London Wall east-west corridor, yet this is not mentioned at page 179, only at the cycle improvements map Figure 11. This may be because it does not originate explicitly from the City Transport Strategy. However, that corridor also links functionally with the emerging Rotunda junction and London Wall West redevelopment proposals. We would therefore support it being added to the policy supporting text if possible.</p>

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Figure 10: Proposed walking improvements 2019-2030	137		171	<p>The detailed explanation of how PCLs (Pedestrian Comfort Levels) work at page 172 with guidance on expected minimum requirements in the City is strongly encouraged.</p> <p>The annotations to Figure 10 on page 171 showing emerging 'Proposed improvements to the TfL road network' are very welcome and the aspirational 2019-2030 timescale is appropriate and acceptable.</p>
Policy AT2: Active Travel including Cycling	138	<p>As raised in our previous response, we request that the wording "in accordance with the London Cycling Design Standards (LCDS)" is added to the second bullet point:</p> <p>It is pleasing that details of cycle network expansion have been provided in figure 17. However, TfL is keen to see a greater commitment towards promoting and enabling the delivery of TfL Cycleways in the plan. The provision of quality, segregated cycle paths in the City of London is patchy and requires improvement, something which TfL is keen to develop. We recommend that need to develop TfL Cycleways, and the City of</p>	173	<p>Although this policy still makes no explicit reference to Cycleways, the earlier strategic policy requirement in the plan targeting for new development to be within 250m of high quality cycle routes is sufficient to address the definitional point previously made.</p> <p>Our previous comments on TfL cycle hire have not been satisfactorily addressed.</p> <p>We request the supporting text at Paragraph 10.9.1 on page 174 currently stating 'TfL Cycleways... will be prioritised' is updated to state: "TfL Cycleways and the TfL cycle hire scheme... will be</p>

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		<p>London's ambition to do so, is reflected directly within Policy AT2. Additionally, we recommend that the cycle network is improved in line with the Cycle Route Quality Criteria. Details and guidance of the criteria can be found here: https://tfl.gov.uk/corporate/publications-and-reports/cycling.</p> <p>We suggest that this policy, or elsewhere in the plan, refers to TfL's cycle hire scheme as a way to promote cycling within the City of London. It is disappointing that there is no mention to this scheme, especially considering how well it is used within the City of London, with 16 of the City's cycle hire docking stations being within the top 100 most used stations in London, out of a total of 800 stations. We suggest that a further bullet point is added to this policy, stating that developers should promote cycling by "engaging with the growing and well-used cycle hire network in the City of London, working proactively with TfL to enable its sustainable growth and management, including providing developer contributions where necessary".</p>		<p>prioritised."</p> <p>Additionally, the current network of TfL cycle hire docking stations should be added to the Figure 11 diagram as it includes 'Existing cycling links'. We also request inclusion of existing cycle hire hub storage facilities at Holborn Circus, Queen Street and Brushfield Street and a proposed new one at Liverpool Street interchange, where a major redevelopment is proposed. These facilitate our docking stations with staff deployed at busy times to receive and manage excess bikes to prevent disruption to cycle hire operations. This enables TfL to manage high demand in congested locations and maintain customer access to TfL cycle hire despite large numbers of arrivals and departures.</p> <p>The significant section 106 funding collected from new development in recent years, which is very welcome, remains unspent on TfL cycle hire network improvements and unallocated to specific geographic locations in the public realm on private land or within TfL or City Corporation public highway boundaries. As such, the emphasis on TfL</p>

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				<p>cycle hire, and support for it should be strengthened within the draft plan, especially considering the positive role TfL cycle hire can play in decluttering streets under pressure from dockless cycle hire pick up/drop off and parking. This will be aided by the imminent introduction to the TfL cycle hire bikes fleet of 1,400 new e-bikes likely to compete more effectively with alternative dockless cycle hire operators.</p>
<p>Policy AT3: Cycle Parking</p>	<p>140</p>	<p>We are pleased that the policy refers to the London Plan cycle standards, and that it promotes the provision of public cycle parking. Provision for public use should be conveniently located close to the entrances of buildings, whenever possible.</p> <p>We appreciate the reference to the London Cycle Design Standards (LCDS), following our previous feedback. However, section 2 appears to state that LCDS guidance only applies to long-stay cycle parking, which is not the case. We suggest revising the policy to reflect that both short-stay and long-stay cycle parking should be in accordance with the LCDS.</p>		<p>The reference in part 3 to off street storage for cargo bikes is welcome and is in line with the recently published TfL Cargo bike action plan. Where the draft plan states at part 5 that 'Opportunities to provide space for dockless parking should be explored where development would create or have an impact on existing public realm', we request that TfL cycle hire is added to the policy, the policy is strengthened to ensure provision rather than only opportunities being explored, and we would recommend you consider including the term 'micromobility' as well as 'dockless parking' to future-proof against potential</p>

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Chapter 7 (Key Areas of Change)	184+	<p>We are supportive of the proposals to prepare further guidance for particular Key Areas of Change, to support the delivery of the proposed vision. This will be an ideal opportunity to promote sensitive approaches to walking, cycling, highway safety and public realm. We would welcome further consultation with the City regarding these documents.</p> <p>Overall, we are pleased that this chapter considers how public transport connections can be encouraged and developed to support growth and developments across the City of London. We also appreciate that impacts of the forthcoming Elizabeth line have been considered in the relevant key areas (Strategic Policies S20, S25, and S26).</p>	243+	<p>changes to the legalisation and the popularity of e-scooters.</p> <p>The Key Areas of Change policies are broadly satisfactory and we have only the following comments:</p> <p>Strategic Policy S17 p. 246</p> <p>We strongly support the references to use of the river for transport, freight, construction and deconstruction materials and waste, whilst retaining Blackfriars, Swan Lane and Tower Piers and enhancing and maintaining access points from both land and water.</p> <p>S18, p. 250</p> <p>We remain committed to the Puddle Dock development proposal including ongoing strategic highway modelling and TfL pre-application engagement. Acceptable strategic highway capacity impacts must be robustly demonstrated.</p>

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				<p>S119 p. 254 We are open in principle to the possibility of new crossing points being created on Lower Thames Street. However, the exact locations shown schematically may be undeliverable and further highway analysis with TfL sign-off is required. Furthermore, all highway works must be delivered at no cost to TfL and with full TfL approval.</p> <p>S118-20 p. 255 We strongly support all references to enhancing the Riverside Walk, particularly policy S19 part 9 part A as it refers to 'a continuous publicly accessible walkway free of cars between London Bridge and Tower Bridge which is accessible to all.'</p> <p>S20 p. 260 Part 4 includes policy requirements and proposals to improve transport and pedestrian connections, all of which are supported in principle, including</p>

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				<p>the draft policy affecting Aldgate bus station. Part 4 E on wayfinding and signage could explicitly reference PCL requirements and Legible London.</p> <p>S21 p. 264 We support part 12 which says pedestrian movement should be given priority through re-allocation of road space on key routes during daytime.</p> <p>P. 265 We also strongly support part 14 on balancing security requirements with high quality public realm that reflects the status of the area and part 15 on new public transport and innovative Freight/Service being required to enable area to accommodate the planned level of growth. This could explicitly mention securing financial contributions from new development to fund necessary infrastructure and supporting facilities and measures.</p>

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				<p>S23 p. 276</p> <p>Part 3 seems out of date given that the Museum of London development now has planning consent as mentioned in the supporting text. There is need for the City to co-ordinate a local public realm working group to ensure provision of new short stay cycle parking and wayfinding signage as mentioned elsewhere at p. 278 paragraph 14.8.5.</p>
Strategic Policy S25 (Liverpool Street)	217-218	We are pleased that the development of pedestrian routes within and around Liverpool Street station have been considered in respect of the forthcoming Elizabeth Line opening. TfL looks	283	<p>S24 p. 281</p> <p>The caveat of Part 9 stating 'whilst not adversely impacting the operation of businesses and the amenity of residents' weakens the policy when existing businesses and residents should also be reducing their freight and vehicular movements over time. This should be removed if possible. Part 10 is strongly supported.</p> <p>This area policy S25 on Liverpool Street is broadly satisfactory except the following changes are requested:</p>

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		forward to working with the City Corporation in enhancing the station and the surrounding transport environment.		<ul style="list-style-type: none"> - Part 1 on accommodating increased footfall should be strengthened significantly with reference to PCLs - Part 3 on welcoming visitor experiences with improved wayfinding should explicitly refer to Legible London.
Strategic Policy S27 (Planning Obligations)	221-222	As mentioned in the above letter, we wish to see bus capacity upgrades specified in this policy, in order to further support the development and smooth operation of the bus network. This is particularly important as additional bus capacity is not classed as 'infrastructure' and therefore not covered by local CIL. We do however recognise that contributions towards this would be subject to the three tests set out in Reg 122 of the CIL Regulations 2010 (as amended), as with other types of developer contribution. We are pleased to see that information on Mayoral CIL has been updated in 8.1.10, in line with our previous feedback.	290	<p>'Strategic transport improvements' should be added as its own sub-point to part 2 and listed as a priority alongside affordable housing for use of section 106, additionally and separately from part f which is currently insufficient to comply with London Plan DF1 parts A and D.</p> <p>This is necessary to ensure full compliance with London Plan policy DF-1 which prioritises strategic transport improvements alongside affordable housing with accompanying examples of step free access to stations, bus capacity and infrastructure, Healthy Streets and cycle network improvements. Clear conformity with T3 and policies T4 is also required.</p> <p>The current policy drafting may give the impression it excludes contributions to highway</p>

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				<p>works along the A10 and general LU, rail, bus and cycle network enhancements from the section 106 regime, which is not appropriate..</p> <p>We are also concerned about the policy as currently drafted in relation to London Plan policies T1, T4 and particularly T3 part E: Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed'.</p> <p>We suggest the policy text is updated to ensure strategic transport mitigation is supported and s106 contributions can be collected for it.</p>
Definition of TfL	243	<p>We suggest that the definition of TfL on page 243 is amended as follows: "The body, under the control of the Mayor of London*, responsible for strategic transport policy and the provision of public transport, including buses, the Underground, and the DLR. TfL is also Traffic and Highways Authority the Transport for London Road Network (TLRN) or 'red routes'."</p>		<p>This has been updated in line with our previous comments. We also acknowledge inclusion of the Healthy Streets indicators diagram from the Mayor's Transport Strategy at page 166 and the explanation making clear the City Transport Strategy aligns with the MTS, which is strongly supported.</p>