

**From:** [Rowland, Michelle](#)  
**To:** [Rowland, Michelle](#)  
**Subject:** FW: Re Mayor's response to City of London's Local Plan Regulation 19 consultation  
**Date:** 22 August 2024 11:03:10  
**Attachments:** [FINAL Col Mayors response Local Plan Reg 19 2.pdf](#)

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R0292

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**From:** Hassan Ahmed [REDACTED]  
**Sent:** Tuesday, August 20, 2024 3:35 PM  
**To:** McNicol, Rob [REDACTED]  
**Cc:** Victoria Thompson [REDACTED]  
**Subject:** Re Mayor's response to City of London's Local Plan Regulation 19 consultation

THIS IS AN EXTERNAL EMAIL

Dear Rob

Please find attached the Mayor's response to City of London's Local Plan Regulation 19 consultation and in response to your formal request for the Mayor's opinion on the general conformity of your draft Plan with the London Plan on 9<sup>th</sup> July 2024.

Please do not hesitate to get in touch to discuss the issues in the letter and to work on a Statement of Common Ground as you mentioned when we last spoke.

Regards

**Hassan Ahmed**

**Team Leader, London Plan and Strategic Planning Team**

GREATER LONDON AUTHORITY

Union Street, London SE1 0LL

[REDACTED]  
My pronouns are he/him

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# GREATER LONDON AUTHORITY

**Rob McNicol**

Assistant Director (planning policy and strategy)  
Environment Department  
City of London  
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EC2V 7HH  
By email: [REDACTED]

[localplan@cityoflondon.gov.uk](mailto:localplan@cityoflondon.gov.uk)

**Department: Planning**

Our reference: LDF07/LDD05/LP03/HA01

Date: 20 August 2024

Dear Rob,

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local  
Development) (England) Regulations 2012**

**Re: Public Consultation Regulation 19 - City Plan 2040**

Thank you for consulting the Mayor of London on the City of London (CoL) Corporation's proposed submission draft City Plan 2040 (Regulation 19). CoL officers formally requested the Mayor's opinion on the general conformity of the draft City Plan with the LP2021 on 9<sup>th</sup> July 2024 under section 24(4)(a) of the Planning & Compulsory Purchase Act 2004. As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below. Transport for London (TfL) have also provided comments, which I endorse, and which are attached at Annex 1.

The Mayor provided comments on the earlier City Plan 2036 (Regulation 18) consultation on 27 February 2019 (Ref:LDF07/LDD05/LP01/HA01) and the proposed submission draft City Plan 2036 (first Regulation 19) consultation on 10 May 2021 (Ref:LDF07/LDD05/LP02/HA01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is more closely aligned with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous responses. The LP2021 was formally published on the 2 March 2021, and now forms part of CoL's Development Plan and contains the most up-to-date policies.

## **General**

In his previous response, the Mayor raised a general conformity objection in relation to the proposed approach to tall buildings, making it clear that, as written, the draft Plan was not consistent with Policy D9 of the LP2021. The Mayor is pleased that in this version of the draft City Plan those particular concerns have now been addressed.

We have however highlighted an issue of concern relating to the eastern edge of the cluster which is set out in the Tall buildings and heritage section. Whilst this does not raise general conformity issues, we believe it is important that it is addressed.

The draft City Plan has a strong focus on creating a healthy and inclusive city which strongly reflects the Mayor's good growth objectives, especially GG1 building strong and inclusive communities and GG3 creating a healthy city. These shared objectives are noted and welcomed.

The strategic approach hinges on CoL's location in the Central Activities Zone and its status as a nationally important location for globally oriented financial business services. The Mayor recognises the unique and important role of the CoL and its strategic contribution to the economy, culture and the identity of the capital and supports its promotion and enhancement.

## **Housing**

Policy SD5 part B of the LP2021 is clear that residential development is not appropriate in defined parts of the CoL and these areas should be identified in the borough's Development Plan and states that offices and other CAZ strategic functions should be given greater weight relative to new residential development. Policy HS1 of the draft Plan reflects that approach which is noted and welcomed.

CoL's housing target as set out in Table 4.1 of the LP2021 is for the delivery of 1,460 new homes between 2019 and 2029 and that figure incorporates a small site housing target for the delivery of 740 new homes. This should be clearly articulated in the draft Plan and should ideally, be set out within policy. The draft Plan should take into account that the LP2021 housing target period starts in 2019 and ends in 2029. As currently written, it isn't clear what level of housing delivery has taken place from 2019 until the start of the City Plan housing period. If there has been under delivery in that time, to be in general conformity with the LP2021, the shortfall should be added to the remaining years of the housing target period up to 2029. Paragraph 4.1.12 of the draft Plan gives an indication that on average there has been the delivery of 175 dwellings a year, however this needs to be more specifically linked to the LP2021 housing period for the Mayor to be assured that the target can be met within that time.

Post-2029, CoL intends to rely on the housing requirement identified by the national standard method up to 2040 which would result in 102 new homes a year. While LP2021 paragraph 4.1.11 sets out the approach for boroughs to apply, it should be noted that planning at the national level is going through a period of review which is likely to have implications that CoL should take into account.

## **Gypsies and Travellers**

A London-wide Gypsy and Traveller Accommodation Needs Assessment is currently being completed and this is reflected and welcomed in the draft Plan. As such, CoL should allow for some flexibility if the findings result in a level of identified need in the area.

## **Older persons housing**

Policy HS7 of the draft Plan identifies a need for 86 additional dwellings for older persons between 2023 and 2040 as evidenced by the CoL Strategic Housing Market Assessment 2023. This is noted and welcomed, and reflects the guidance set out in LP2021 Policy H13 A1.

## **Affordable housing**

Policy S3 part 2 reflects the Mayor's thresholds for affordable housing but treats them as targets which is not the intention of Policy H5 of the LP2021. The draft Plan uses language such as "...ensuring the delivery of a minimum of 50% affordable housing on public sector land". Although this is supplemented by part 3 of the policy which states that viability assessments will be required for any proposals not meeting the requirements, the language used could be clearer by avoiding the term '...ensuring a minimum...' which carries the implication of a target and could be misleading.

## **Offices**

CoL are proposing to deliver at least 1.2m sqm of office space over the Plan period. It is intended to deliver this in a stepped approach resulting in 900,000 sqm during 2021-2031 and 300,000 sqm for the remaining period up to 2040.

It is noted that demand is based on the middle of three growth projections which is aligned with GLA 2022-based long term employment projections for the CoL.

## **Safeguarded Wharves**

Walbrook Wharf is a safeguarded wharf under the Safeguarded Wharves Review 2018-2021 and, as such, is protected by Safeguarding Directions issued by the Secretary of State. It is noted that the draft Plan intends to continue to safeguard the wharf as a river and waste transfer site which is welcomed.

## **Tall buildings and heritage**

Policy S12 defines tall buildings as those which are over 75m above Ordnance Datum (AOD) and this is consistent with the requirement of LP2021 Policy D9A. Areas that may be suitable for tall buildings are identified on the policies map and in Figure 14. In addition, 'maximum permissible' tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and are included in Figure 15. In the Mayor's earlier Regulation 19 response, he raised a general conformity objection setting out that detailed 3D modelling should be used to assess potential impacts of tall buildings on heritage assets and in particular the potential impacts of tall buildings in the City Cluster on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS). The earlier version did not identify suitable areas for tall buildings but did the inverse, and nor did it set out appropriate tall building heights. This version of the draft Plan now sets out clearly

defined areas that may be suitable for tall buildings at Fleet Valley and the City Cluster. The draft Plan now also sets out height parameters within the identified tall building locations and these are referred to as the 'jelly mould', with the same terminology used in this letter.

The Mayor welcomes the addition of tall building parameters. This allows stakeholders and decision-makers to make informed decisions about tall buildings within the CoL, including in accordance with LP2021 Policy D9. By identifying clearly defined areas considered suitable for tall buildings, a comprehensive assessment of the potential impacts of the approach can now be evaluated. We consider therefore that the approach now meets the requirements of Policy D9.

However, the Mayor does not yet understand how it meets the requirements of parts A and D of Policy HC2 in relation to the ToL WHS or how it is consistent with Policies HC1 and HC4. Given this, while the Mayor is of the view that the draft Plan is in general conformity with the LP2021, he has concerns regarding the potential impacts of the approach on the ToL WHS which he has asked GLA officers to work with the CoL to help resolve.

Policy HC2 of the LP2021 makes it clear that boroughs that are neighbours to authorities with WHSs are expected to include in policies in their Development Plans that conserve, promote, actively protect and interpret the OUV of WHSs. In part D the Policy sets out that up-to-date World Heritage Site Management Plans should be used to inform the plan-making process.

The Mayor's concerns relate specifically to the part of the 'jelly mould' to the eastern edge where the massing of the cluster, in relation to the ToL, would have greatest impact. It is not clear how this as currently described, or the evidence to support it, demonstrates how LP2021 Policy HC2 would be met.

Policy HE3 and Policy S11 of the draft Plan largely reflect and repeat what is contained in LP2021 Policy HC2. It makes it a requirement that HIAs should be submitted along with planning applications that could affect the setting of the ToL and that development proposals within the Local Setting Area of the Tower of London should seek improvements to the public realm and connectivity. Other requirements include encouraging the enhancement and protection of pedestrian and cycle routes. We consider that the policy needs to do more to interpret the OUV of the ToL WHS and to consider impacts on its wider setting. Policy HE3 seems more focussed on the Local Setting of the WHS and does not address the potential impacts on the OUV. The setting of the WHS consists of its wider surroundings in which it is experienced and is recognised as fundamentally contributing to the appreciation of its OUV as set out in paragraph 7.2.3 of the LP2021.

The Strategic Views Impact Assessment<sup>1</sup> (SVIA) sets out in 3D, the proposed 'jelly mould' that is proposed to represent the 'shell' within which tall building development could be considered to be acceptable. Overall, the clarity and certainty this provides is welcomed and will serve as a useful tool. However, the Mayor questions whether the resulting jelly mould

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<sup>1</sup> <https://www.cityoflondon.gov.uk/services/planning/planning-policy/evidence-draft-city-plan-2040>

for the eastern edge of the cluster has been sufficiently informed by an interpretation of the OUV of the ToL WHS as required by Policy HC2.

Whilst the ToL HIA<sup>2</sup> (published as part of the evidence base) refers to the Tower of London World Heritage Site Management Plan 2016 and is clear about the potential threats to the OUV of the WHS, it seems to suggest that the 'jelly mould' was pre-determined rather than the HIA using the management plan to inform the CoL's proposed approach. This is despite a recognition that "The ability of the Tower to reflect its strategic siting and historic relationship to the City of London is vulnerable to proposals for development that do not respect its context and setting." There is little evidence setting out how these considerations have been taken into account when formulating the 'jelly mould' shape.

The analysis of the heritage impact of the 'jelly mould' set out in the HIA also suggests that the change to the setting would be very small because the proposed city cluster would not encroach any further towards the ToL. However, the figures included in the HIA show a significant increase in massing via the 'jelly mould' to the east of the permitted development at 100 Leadenhall Street. We are not clear how the analysis has assessed or demonstrated the heritage impact given it seems to rely on physical distance rather than the relationship of development at different heights and scale.

The GLA issued (January 2024) a Practice Note: Heritage Impact Assessments and the setting of heritage assets<sup>3</sup>. CoL officers should have regard to this as it provides advice on the preparation of such documents.

### **Air Quality**

The Mayor welcomes the proposed approach towards air quality and notes that Policy HL2 part 3 requires all development to be at least Air Quality Neutral which reflects the approach in LP2021 Policy SI 1.

CoL should also note Policy SD4D of the LP2021 clearly sets out that due to the dense nature of the CAZ, practical measures should be taken to improve air quality, using an air quality positive approach where possible and this should be incorporated into the draft Plan.

### **Public Toilets**

Draft Policy HL6 promotes the widespread distribution of public toilets making it a requirement of proposals for major leisure, retail and transport developments. The proposed approach reflects Policy S6 of the LP2021 and is welcomed.

### **Transport**

The Mayor notes the exceptional usage of TfL's cycle hire scheme within CoL. From 2021 to 2023, the City recorded the highest average daily usage per docking station of any local authority in London.

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<sup>2</sup> <https://www.cityoflondon.gov.uk/assets/Services-Environment/tower-of-london-heritage-impact-assessment.pdf>

<sup>3</sup> <https://www.london.gov.uk/sites/default/files/2024-01/Heritage%20Impact%20Practice%20Note%20%281%29.pdf>

To further enhance this success, TfL suggests mapping the existing TfL cycle hire and strengthening policy support in the plan for further expansion and support of TfL's cycle hire network. This could significantly benefit the plan prior to adoption.

## **Waste**

Policy S16 of the draft Plan sets out CoL's proposed approach to the management of its waste. The supporting text makes it clear that CoL cannot meet its waste arisings within its area and therefore relies on its agreement with London Borough of Bexley and its participation with the South-East London Joint Waste Planning Group (SELJWP).

The Waste Topic Paper that has been published as part of the Local Plan evidence base refers to the latest update to the group's technical paper, but it would be beneficial if this document were to be published alongside CoL's evidence base.

The latest Waste Technical Paper for the SELJWP is clear that Bexley is able to meet CoL's London Plan waste apportionment target, but it recognises that some of CoL's waste will continue to be exported outside of London. Movements of waste outside of London are limited to streams for construction, demolition and excavation (C,D & E) waste which doesn't make up CoL's London Plan apportionment target.

However, construction and demolition waste forms part of the Mayor's target that London should be self-sufficient in the management of its waste by 2026 as set out in LP2021 Policy S18. More information about waste movements to waste authorities outside of London is therefore considered necessary as it could risk the Mayor's ability to meet that target. We suggest that CoL monitor this rigorously and share that data with the GLA on a regular basis. This will enable GLA to monitor net movements of waste into and out of the capital.

## **Viability**

Policy PC1 provides some clarity with respect to CoL's proposed approach to viability assessments is noted. However, it should also take into account that for those development proposals where viability may be called into question the correct approach is set out in Policy DF1 of the LP2021. Part D of that policy makes it clear that when setting policies in Development Plans it should be clear that where it is demonstrated that planning obligations cannot viably be supported, priority should firstly be applied to affordable housing and necessary public transport improvements. In light of this the policy should be amended accordingly.



### **Next steps**

I hope these comments positively inform the ongoing preparation of CoL's Local Plan. GLA officers are keen to continue working with you to address the issues identified in this letter and to ensure it aligns more closely with the LP2021 as well as delivering the CoL's objectives. If you have any specific questions regarding the comments in this letter, please do not hesitate to contact Hassan Ahmed on [REDACTED]  
[REDACTED]

Yours sincerely,

[REDACTED]

Lucinda Turner

### **Assistant Director of Planning**

Cc: Unmesh Desai, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG



## Annex 1 – Transport for London Response

Transport for London  
City Planning  
5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

10/04/2024

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.

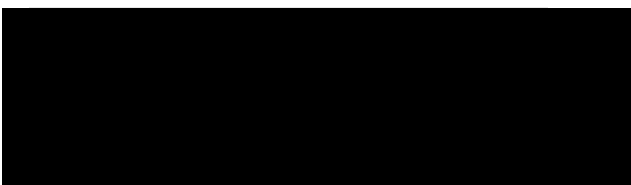
Overall, we appreciate the majority of our previous comments have been incorporated in this draft. We have further comments and suggestions included in Appendix A.


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

A large black rectangular redaction box covering the signature area.

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



## 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 <a href="#">PDF doc</a> )	Reg 19 Final Comments
<b>Strategic Policy S1 (Healthy and Inclusive City)</b>	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.
<b>Strategic Policy S2: Safe and Secure City</b>	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’.
<b>Policy SA3 (Designing in Security)</b>	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	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

Section	Page	Previous Comments	New page number (in <a href="#">PDF doc</a> )	Reg 19 Final Comments
		that engaging street furniture and the use of trees, planters and benches could help reduce the impact of Hostile Vehicle Mitigation (HVM) measures.		that 'where non-integrated HVM is shown to be necessary, consideration should be given to the use of trees, planters and benches to reduce its visual impact.'
<b>Policy CV4 (Hotels)</b>	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.
<b>Strategic Policy S8 (Design)</b>	102-103	<p>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.</p> <p>Relatedly, segregated cycle routes should be more strongly promoted within the City of London and more explicitly in this policy document. The</p>	123	<p>We welcome that our previous recommendation to prioritise both walking and cycling has been addressed in point 10 of Sustainable Design.</p> <p>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).</p>

Section	Page	Previous Comments	New page number (in <a href="#">PDF doc</a> )	Reg 19 Final Comments
		<p>current lack of segregated routes in the area needs 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>		
<b>Policy DE2 (Design Quality)</b>	107-108	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	132	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.

Section	Page	Previous Comments	New page number (in <a href="#">PDF doc</a> )	Reg 19 Final Comments
		development should particularly consider the 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).		
<b>Policy DE3 (Public realm)</b>	111-112	<p>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.</p> <p>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.</p>	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.
<b>Strategic Policy S9 (Transport and Servicing)</b>	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.

Section	Page	Previous Comments	New page number (in <a href="#">PDF doc</a> )	Reg 19 Final Comments
		<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><b>Cycling Promotion Plans (incorporated within Travel Plans)</b></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>		
<b>Figure 7: Proposed Street Hierarchy</b>	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</p>

Section	Page	Previous Comments	New page number (in <a href="#">PDF doc</a> )	Reg 19 Final Comments
		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.		A10's 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.
<b>Policy VT1 (The impacts of development on transport)</b>	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.
<b>Policy VT3 (Vehicle Parking)</b>	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 <b>non-residential</b> car parking <b>facilities bays</b> must be equipped with <b>active</b> electric vehicle charging points <b>usable from the outset</b> ', 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.		<p>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."</p> <p>Overall we would strongly support the policy simply defining all car parking, loading or taxi/private hire bays at all new non-residential development in the City as 'operational' in the context of the London Plan and therefore in need of active electric vehicle charging points for all spaces from the outset.</p>
<b>Policy VT4 (River transport)</b>	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.
<b>Strategic Policy</b>	133-	Changing the title of Strategic Policy S10 to	164	We welcome the update to 'the 250m point' we

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<b>S10: Active Travel and Healthy Streets</b>	134	<p>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 “<u>nearly</u> 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>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 <b>and New cycle route Quality Criteria</b> 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>
<b>Policy AT1: Pedestrian Movement, Permeability and Wayfinding</b>	135-136	TfL is supportive of this policy, and the changes since the Regulation 18 stage. However, we suggest adding that “Minimum pavement widths should accord to TfL's Pedestrian Comfort guidance” in addition to section 2.	168-169	<p>Our previous request to explicitly refer to the Pedestrian Comfort Guidance for London has been addressed, which we welcome.</p> <p>Our previous emphasis of specific Safer Junctions</p>

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		<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: <a href="http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf">http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf</a>.</p>		<p>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 11 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 improvements, addition to the reference to</p>

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				<p>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 '<b>use of City Corporation funding and section 278 works</b>' 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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				<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><b>Figure 10: Proposed walking improvements 2019-2030</b></p>	<p>137</p>		<p>171</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>
<p><b>Policy AT2: Active Travel including Cycling</b></p>	<p>138</p>	<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>	<p>173</p>	<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 <b>the TfL cycle hire</b></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: <a href="https://tfl.gov.uk/corporate/publications-and-reports/cycling">https://tfl.gov.uk/corporate/publications-and-reports/cycling</a>.</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><b>scheme</b>...will be 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 1400 new e-bikes likely to compete more effectively with alternative dockless cycle hire operators.</p>
<p><b>Policy AT3: Cycle Parking</b></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 changes to the legalisation and the popularity of e-</p>

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				scooters.
<b>Chapter 7 (Key Areas of Change)</b>	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>The Key Areas of Change policies are broadly satisfactory and we have only the following comments:</p> <p><b>Strategic Policy S17 p. 246</b> 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><b>S18, p. 250</b> 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 data-bbox="1424 432 2087 735"><b>S19 p. 254</b> 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 data-bbox="1424 858 2087 1086"><b>S18-20 p. 255</b> 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 data-bbox="1424 1171 2087 1319"><b>S20 p. 260</b> 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><b>S21 p. 264</b> 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><b>P. 265</b> 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/Servicing 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><b>S23 p. 276</b> 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> <p><b>S24 p. 281</b> 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>
<b>Strategic Policy S25 (Liverpool Street)</b>	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	This area policy S25 on Liverpool Street is broadly satisfactory except the following changes are requested:

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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"> <li>- Part 1 on accommodating increased footfall should be strengthened significantly with reference to PCLs</li> <li>- Part 3 on welcoming visitor experiences with improved wayfinding should explicitly refer to Legible London.</li> </ul>
<b>Strategic Policy S27 (Planning Obligations)</b>	221-222	<p>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.</p> <p>We are pleased to see that information on Mayoral CIL has been updated in 8.1.10, in line with our previous feedback.</p>	290	<p><b>'Strategic transport improvements'</b> 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 DF1 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 T<sub>1</sub>, T<sub>4</sub> and particularly T<sub>3</sub> 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>
<b>Definition of TfL</b>	243	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’.”		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.

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