

Appendix 4 – Further Matter Statement – Main Matter 16 (Active Travel and Healthy Streets) (Policies S10 and AT1 to AT3)

The CPA sets out below a response to a question set out in the Inspector’s Issues and Questions in respect of Main Matter 16 (Active Travel and Healthy Streets) (Policies S10 and AT1 to AT3).

Inspector’s Issue/Question: Are the policies relating to Active Travel and Healthy Streets justified by appropriate available evidence, having regard to national guidance, and local context, and are they in ‘general conformity’ with the London Plan?

CPA Response: Policy AT3(1) is not supported by any specific evidence on cycle parking requirements and adopts the cycle parking standards set out within the London Plan (2021). The London Plan standards have been established from a 2017 TfL study which considered cycle parking demand on a London-wide basis (albeit making a distinction for some boroughs which the study recommended adopted higher cycle standards).

In December 2024, the CPA published a report entitled ‘[Cycling and the City](#)’ which provides a detailed analysis of commuting patterns in the City to help inform future cycle parking requirements in office development. This report was not available at the time of submission of the CPA’s Regulation 19 representations (June 2024) but its findings provide relevant evidence to the Inspector’s consideration of Policy AT3(1) and has therefore been included as an Appendix to this Matter Statement (Appendix 5(a)).

The *Cycling and the City* report provides clear evidence that an alternative approach to cycle parking standards as set out within the London Plan (2021) is needed for the City of London and further justifies the case for changes to be made to Policy AT3(1). To summarise:

1. Cycle parking policy for City of London offices should be updated to reflect a target cycle mode share of circa 11%, rather than the existing 19% target. This would more accurately reflect the detailed review, survey and analysis contained within the *Cycling and the City* report. TfL recognised commutes of 10km and under as potentially cyclable and this distance should be used to inform an achievable cycle mode share in the City of London.
2. Cycle standards referred to in Policy AT3(1) should be based on Net Internal Area (NIA), not Gross External Area (GEA). With GEA, plant space and even the area required for cycle parking itself generates a requirement for further cycle parking, because cycle parking space is captured within the GEA measure of a building. Cycle parking provision should be correlated to the actual occupational density of buildings, and NIA is the appropriate metric for this. NIA is the area usually occupied by office workers and is a more robust indicator of the number of employees using a building.

In addition, the cycle parking standards within the City of London should also be based on a more plausible occupational density assumption. The London Plan’s occupational density assumption is 1 employee per 12sqm GEA (equivalent to 1 employee per 8sqm NIA). The *Cycling and the City* report substantiates why the density that should be applied in the City of London is 1 employee per 15sqm NIA. This represents a considered balance between the current British Council of Offices standard of 1 employee per 12.5sqm and the results of the report survey which demonstrated an average occupational density of 1 employee per 21 sqm NIA.

3. Policy should give more emphasis to the size and functional operation of facilities, rather than setting policy that focusses purely on the quantum of cycle parking. Greater flexibility on cycle parking types should be encouraged, as well as consideration for evolving requirements such as e-bike storage and charging, enhanced arrival experience and cycle promotion plans.

4. It is recommended that monitoring regimes are put in place, secured through Cycle Promotion Plans, which would enable cycle parking usage to be reviewed annually. This could allow meanwhile uses to occupy vacant spaces and provide meaningful uses and if cycle parking demand was to increase then the building owner would be obliged to provide additional storage with associated facilities. It is recommended that office cycle parking policy is updated to allow cycle parking volumes to be phased in with demand, governed by annual monitoring and secured through cycle promotion plans.

In respect of points (1) and (2) above, based on an occupancy of 1:15sqm NIA, an 11% cycling mode share would equate to a cycle parking standard of 1 cycle parking space per 136 sqm NIA.

The CPA therefore suggests the following amendments to Policy AT3(1) (changes shown in red/tracked changes):

“Policy AT3: Cycle Parking

1. Developments must provide on-site cycle parking for occupiers and visitors, complying with London Plan standards, **aside from long stay cycle parking for office developments which should provide 1 cycle parking space per 136 sqm NIA. Developments, and** will be encouraged to provide facilities for public cycle parking.
2. All long stay on site cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.
3. Developments that include ground floor retail and take-away food outlets should provide appropriate off-street storage for cargo bikes and hand carts.
4. Cycling facilities should be **well designed for end users**, conveniently located, easily accessible, safe and secure. **Consideration should be given to a range of cycle parking type provision.**
5. Opportunities to provide space for dockless parking should be explored where development would create or have an impact on existing public realm.
6. **The use of Cycle Promotion Plans will be encouraged and the use of unutilised space for appropriate meanwhile uses will be acceptable in principle where cycle parking demand is demonstrated to not meet cycle parking standard requirements.”**

We would suggest the following amendments to the Policy supporting text:

“10.10.4 The Mayor’s Transport Strategy seeks to ensure that on-street cycle facilities cater for the wide range of cycles used by disabled people. **All cycling facilities should be well-designed for end users, giving careful consideration to the appropriate size and functional operation of spaces. Consideration should be given to a range of cycle parking provision.**

10.10.5 This policy applies to the cycle parking provided within new developments. The City Corporation’s Transport Strategy addresses public cycle parking. Developers are encouraged to provide additional public cycle parking facilities within the curtilage of their developments. The Transport Strategy aims to ensure that operators of dockless cycle and scooter hire schemes require users to leave cycles and scooters in designated parking locations.

10.10.6 Where appropriate, Cycle Promotion Plans will be secured via section 106 legal agreement which should enable cycle parking usage within buildings to be monitored and reviewed annually. Where there is evidenced under-utilised space appropriate meanwhile uses will be acceptable, subject to the consideration of other relevant planning policies. Where cycle parking requirements do increase (to a maximum of the number required by policy), developments will be obliged to provide the required cycle parking space and associated facilities.”

These changes would still enable Policy AT3(1) to be in ‘general conformity’ with the strategic policies of the London Plan. Arguably, for some strategic policies, the changes suggested by the CPA would make Policy AT3(1) more aligned with the London Plan’s strategic policies. This is detailed as follows:

1. London Plan Policy GG2 seeks to create “successful sustainable mixed-use places that make the best use of land”. As demonstrated in the *Cycling and the City* report, in many instances cycle parking space within the City of London is vacant and is not making the best use of land. Updating standards for the City of London so that space could be better utilised would better align Policy AT3(1) with Policy GG2.
2. London Plan Policy GG2 (part G) states that those involved in planning and development must “plan for good local walking, cycling and public transport connections”. Policy GG3 requires active and healthy lives for all Londoners to be promoted. Policy GG5 (Part G) requires London’s cycling network to be used to the fullest to support agglomeration and economic activity. The changes suggested by the CPA would still ensure that office developments within the City of London provide cycle parking facilities. These would just be more proportionate in relation to actual demand, allowing any residual space to be better utilised.
3. London Plan Policy GG6 requires those involved in planning and development to seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050 (Part A) and Policy GG5 (Part H) states that the benefits of a transition to a low carbon circular economy should be recognised and promoted. As demonstrated in the *Cycling and the City* report, the high volumes of vacant cycle parking in policy compliant City of London buildings are leading to unnecessarily high levels of embodied carbon in new buildings. Providing the correct levels of cycle parking in new buildings would reduce embodied carbon and therefore, the changes suggested would better align with the strategic aims of Policy GG6.
4. London Plan Policy GG5 aims to conserve and enhance London’s global economic competitiveness. Providing facilities within buildings which are utilised will be more beneficial for economic success.

For the reasons set out above, it is considered that it is appropriate for there to be a distinct local approach applied for the City of London cycling standards, notwithstanding that the requirements within London Plan Policy T5 are set as a minimum. The changes set out would be more reflective of appropriate up-to-date evidence and would better align with the strategic policies of the London Plan.

It should also be noted that the London Plan is currently in the process of being reviewed and we expect that a high-level document setting out a direction of travel for the Plan will be published next month, with adoption of the new Plan currently scheduled for 2027. As part of this process, we understand that TfL will be reviewing cycling and car parking standards for the evidence base (planned for autumn 2025). We would hope that any review of the standards will take into consideration the points raised within this Statement and our *Cycling and the City* report.

Inspector’s Issue/Question: Are the policies relating to Active Travel and Healthy Streets positively prepared ‘in a way that is aspirational but deliverable’?

CPA Response: No additional comments.

Inspector's Issue/Question: Do the policies provide clear direction as to how a decision maker should react to a development proposal?

CPA Response: No additional comments.

Appendix 4a – Cycling and the City Report, City Property Association (December 2024)