

**Statement of Common Ground (SoCG) between
City of London Corporation and Transport for London**

10/03/2025

Chapter 10 Transport

1. Purpose of the Statement of Common Ground

- 1.1. The purpose of this SoCG is to update the local plan Inspector/s and other parties in relation to matters raised within Regulation 20 representations. The topics covered in this SoCG are active travel, transport and servicing.
- 1.2. This SoCG has been prepared alongside hearing statements published on 6 March 2025. See Proposed Changes letter and document (LD26) for comments from TfL which are already considered. It highlights matters where agreement has been reached, and areas where agreement has not yet been reached but will be subject to further discussion at the local plan examination hearings.
- 1.3. This SoCG is in addition to any other matters statements to be produced during the course of the examination by either party.

2. Parties

- 2.1. The signatories to this SoCG are the City of London Corporation (City Corporation) and Transport for London.

3. Comments received at Regulation 19

- 3.1. Transport for London submitted their response to the Regulation 19 City Plan on 6 May 2024. This raised comments in relation to active travel, transport and servicing (Chapter 10).
- 3.2. Table 1 below includes the relevant reference number of the comments to which this SoCG relates, both parties agree this is a true record of the main matters subject to this SoCG.

Table 1- Representation references

Comment ID	Chapter	Summary	LD26	Section of SoCG
R0118/C001 1	Chapter 10 Transport	Support the policy in 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	New	Agree

		electric vehicle charging points for all spaces from the outset.		
R0118/C0008	Chapter 10 Transport	Addition to S10 part 1 to include New cycle route Quality Criteria	New	Disagree
R0118/C0001	Chapter 10 Transport	Revision to paragraph 10.8.2-10.8.3 to include language referring to funding of major schemes	New	Agree
R0118/C0013	Chapter 10 Transport	Revision of S24 part 9 to encourage existing businesses to reduce freight and vehicle movements and not protect residential amenity	New	Disagree
R0118/C0009	Chapter 10 Transport	Mapping of the TfL cycle hire and additional reference within the plan would be beneficial	LD26	Agree
R0118/C0007	Chapter 10 Transport	Include 'strategic transport improvements' in S26	Revised	Agree
R0118/C0003	Chapter 10 Transport	Reference to TfL cycle hire scheme	LD26	Agree

4. Matters on which parties agree

- 4.1. Both parties agree on the importance of policies in the City Plan to shift journeys, including deliveries and servicing trips, to sustainable modes, apply the Healthy Streets Approach through the use of TfL Pedestrian Comfort Guidance, and comply with the London Plan car parking standards.
- 4.2. Both parties agree on the clear requirements for developer contributions toward active travel and public transport infrastructure.
- 4.3. Both parties agree on the approach and inclusion of the Healthy Streets indicators diagram from the Mayor's Transport Strategy and the explanation making clear that the City of London Transport Strategy aligns with the MTS.
- 4.4. Both parties agree that the maps of planned improvements to the City's walking and cycling networks in the Map are welcome.
- 4.5. Both parties note the success of TfL cycle hire scheme within the square mile and agree that the plan can make additional reference to this. See proposed change to paragraph 10.9.1.

5. Agreed proposed changes (if any)

- 5.1. Table 2 below sets out the proposed changes which the City Corporation is putting forward to the examination which result from the matters as above (and other representations in some cases). See Proposed Changes letter and document (LD26).

Table 1 Proposed changes

Paragraph	Proposed change
10.9.1	TfL Cycleways and the TfL cycle hire scheme...will be prioritised.
S9 (4)(h)	Requiring developers to demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans
AT3 (2)	<u>In exceptional circumstances, if London Plan minimum long stay standards cannot be fully met for office development, a contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations. All long stay cycle parking must be secure, undercover and preferably enclosed, in accordance with the London Cycle Design Standards.</u>
10.10.1	<u>A robust justification for failure to comply with London Plan minimum long stay standards will be required. This will be considered on a case-by-case basis as part of pre-application discussions. A contribution towards improvements to cycle infrastructure in the City will be secured through s106 planning obligations proportionate to the under-provision.</u>
AT3 (5)	Opportunities to provide space for dockless parking and TfL cycle hire docks should be explored where development would create or have an impact on existing public realm.
S26	<u>Amendment to PC 103 and 104 (LD26)</u> (2) Prioritising affordable housing and necessary public transport improvements, aligned with London Plan policy DF1, when seeking planning obligations. (3) Requiring s106 planning obligations having regard to the impact of the obligation on the viability of development, for: Remove 2(b) and reorder b-g
VT3(4)	<u>All off-street non-residential car parking facilities bays must be equipped with active electric vehicle charging points usable from the outset'.</u>

6. Matters on which parties disagree

6.1 Table 3 below sets out matters which have not yet been agreed by the two parties.

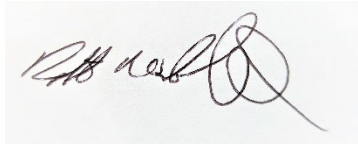
Table 2- Matters not agreed

Topic/matter	City of London Corporation	Transport for London
AT3 part 2- cycle parking	<p>The suggested addition to the policy provides flexibility to the policy for office tall buildings developments.</p> <p>In order to permit the provision of less cycling spaces in exceptional circumstances where a strong justification is provided, improvements to wider cycle infrastructure in the City would be secured</p>	Noted.

	through a s106 planning obligation commensurate to the under provision.	
Revision of S24 part 9 freight and vehicle movements	<p>The caveat in Part 9 does not discourage residents from reducing their freight and vehicle movements. The caveat seeks to protect residential amenity so it should not be removed.</p> <p>We are happy to remove the part which states ‘impacting the operation of businesses’ in order to support the shift to more sustainable modes of freight.</p>	Noted.
Addition to S10 part 1 to include New cycle route Quality Criteria	<p>The purpose of the policy is to encourage developments to consider the Healthy Streets Approach.</p> <p>The New Cycle Route Quality Criteria, and LTN 1/20, are both included in the Transport Strategy Proposal 22. The Transport Strategy and City Plan sit alongside each other so it is not considered necessary to include this reference.</p>	Agree that a repetition of various guidance is not needed in the local plan if the references to documents are included within the Transport Strategy.
Operational parking	<p>Policy VT2(3) makes clear that servicing areas must be equipped with electric vehicle fast charging points. While the use of electric freight vehicles is supported, there is a lack of certainty on the fire risk and safety from building control.</p> <p>To add additional clarity to the policy while safety is determined a change is proposed: Servicing areas should be equipped with electric vehicle fast charging points to support electric</p>	Noted.

	freight. As the plan period is to 2040, it is important that the Plan responds to present and future needs as they may change.	
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Signed on behalf of City of London Corporation:

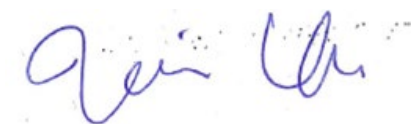


Rob McNicol

Assistant Director – Planning Policy & Strategy

City of London Corporation

Signed on behalf of the Transport for London



Josephine Vos

London Plan and Planning Obligations Manager

Transport for London