



**City of London Corporation**  
**City Plan 2040 — Examination in Public**  
**Matters Statement**

**Main Matter 15: Transport and**  
**Servicing**

**Are the requirements for Transport and Servicing justified by appropriate available evidence, having regard to national policy and guidance, local context, and are they in ‘general conformity’ with the London Plan?**

The policies on Transport and Servicing are justified by appropriate evidence, having regard to national guidance and local context and they are in general conformity with the London Plan. The Transport and Servicing policies have been prepared in context of the London Plan and Mayor’s Transport Strategy.

Paragraph 108 (B) of the NPPF (2023 version) states that in plan-making, *“opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, should be realised, for example in relation to the scale, location or density of development that can be accommodated”*. Paragraph 10.1.0 of the CP highlights that over 90% of commuter travel to the City is by public transport, walking or cycling. Less than 5% of City workers drive to work. The policies of the CP are written in the context of the transport environment of the Square Mile and considers that the journeys to, from and within the City are predominantly by active and sustainable travel.

Paragraph 110 (C) of the NPPF states: *“planning policies should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development”*. LP Policy T3(B1) states that Development Plans should safeguard existing land and buildings used for public transport, active travel or related support functions. CP Policy S9(1) directly responds to these requirements by stating that *“the City’s transport infrastructure will be maintained and improved by safeguarding land where necessary as shown on the Policies Map, to enable the delivery of increased public transport capacity. Proposals which are contrary to the safeguarding of strategic infrastructure projects will be refused”*. For example, on Policies Map B (LD2) there are two safeguarded areas for strategic transport: Crossrail Safeguarding Area and Bank Station Northern Line Upgrade Safeguarding Area. Both the Crossrail Safeguarding Area and Bank Station Northern Line Upgrade Safeguarding Area have been in place to enable upgrades to existing and new public transport services.

Paragraph 111 parts A, B and C of the NPPF state that if plans are setting local parking standards for residential and non-residential development, policies should take into account the accessibility of the development, the type, mix and use of the development and the availability of and opportunities for public transport. LP policy T6(B) states that car-free development should be the starting point for all development in places that are well-connected by public transport. LP policy T6(E) states that appropriate disabled persons parking for Blue Badges holders should be provided. CP policy VT3(1) therefore confirms that development in the City should be car-free except for designated Blue Badge spaces. Paragraph 10.4.0 of the City Plan states that the City has excellent public transport accessibility and all development should therefore be car-free (except for designated Blue Badge spaces) unless it can be demonstrated that there are exceptional circumstances which justify limited car parking, in line with London Plan standards.

The London Plan and Mayor of London’s Transport Strategy set out clear expectations and goals for transport and servicing across LP policies T6, T7 and MTS policy 14. The policies in the CP support, reiterate and build on the policies in the LP and MTS. For example, LP policy T6(I) states that adequate provision should be made for efficient deliveries and servicing and emergency access. The

CP directly responds to this requirement in the LP by ensuring that it responds to the City’s local context. CP policy VT2(3) states that development should be designed to provide for on-site servicing bays within buildings, wherever practicable. To support efficient delivery, policy VT2 (3) requires that on site servicing areas should be of a sufficient size and design to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Paragraph 10.3.0 of the CP states that the low numbers of private motor vehicles in the City mean that delivery and service vehicles have a relatively greater impact on traffic congestion and air quality, especially in areas of high-density development and narrow streets. Efficient off-street servicing and delivery arrangements are vital to keep the City’s traffic moving and thereby avoid air pollution caused by stationary traffic.

LP policy T7(G) states that Construction Logistics Plans and Delivery and Servicing Plans will be required and should be delivered in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. CP policy S9(4H) is aligned with the LP, requiring developers to demonstrate through Construction Logistics Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development. Paragraph 10.2.8 of the CP states that a full Construction Logistics Plan (CLP) will be required by condition with outline details required at the application stage. A CLP should comply with the measures set out in the City Corporation’s Code of Practice for Deconstruction and Construction Sites and with TfL’s online guidance.

LP policy T7(I) states that in large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans. CP policy VT2(2) states that major commercial development must provide for freight consolidation and use technological and procurement solutions that enable efficient servicing and deliveries to sites. Paragraph 10.3.7 of the City Plan states that Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m<sup>2</sup> and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational deliveries and servicing. For smaller development, the CP encourages DSPs and they may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements.

In policy 14 of the Mayor of London’s Transport Strategy 2018, it states: *“the Mayor of London, through TfL and boroughs, and working with stakeholders, will seek to enhance London’s streets and public transport network to enable disabled and older people to more easily travel spontaneously and independently, making the transport system navigable and accessible to all and reducing the additional journey time that disabled and older users can experience”*. The CP directly responds to this requirement in CP policy S9(3), through promoting further improvements to public transport capacity and step-free access at existing mainline, London Underground stations, Docklands Light Railway (DLR) stations and river piers.

City Plan 2040 is aligned with the London Plan and TfL guidance. The policies of the City Plan align with the London Plan in seeking to reduce vehicular traffic, promote sustainable freight, enhance public transport and minimise road danger and congestion.

## **Are the policies relating to Transport and Servicing positively prepared ‘in a way that is aspirational but deliverable’?**

The policies in the CP relating to Transport and Servicing are positively prepared in a way that is aspirational but deliverable. The transport and servicing aspirations of the policies in the City Plan are aligned with the aspirations of the City Corporation’s Transport Strategy (ED-INF2). Page 18 of the Transport Strategy states that: *‘Transport plays a key role in enabling and accommodating development, and the way the City grows affects demand for travel and public space. Reflecting this interrelationship, relevant policies and proposals in the City Plan 2040 and this Strategy are aligned’*. This ensures that the deliverability of the policies is supported across the Corporation through the collaboration of multiple teams. For example, the Transport and Planning teams collaborated on engagement for the Transport Strategy and City Plan during the summer of 2023 sharing outcomes.

The Transport Strategy is split into Outcomes, which take an aspirational approach, and specific Proposals which achieve those Outcomes. *‘Outcome 10: The Square Mile benefits from better transport connections’* states that public transport will remain the main way that people travel to the Square Mile and continued investment will ensure that the City remains one of the most well-connected business districts in the world. Proposal 42: *‘Support and champion improve connections in the Square Mile from Greater London and the surrounding region’* states that the City Corporation will work with the Mayor of London, TfL, Government, local authorities neighbouring the City and other related partners to improve regional connectivity to the Square Mile, including through supporting improvements to street level interchange between Fenchurch Street and Tower Hill, Tower Gateway and Aldgate stations, including wayfinding, as a longer-term aspiration. CP policy S9(2) is aligned with Proposal 42 in aiming to implement improvements to street-level interchange between Fenchurch Street and Tower Hill and Tower Gateway stations and working with partners to explore the feasibility of a direct interchange route in the longer-term. In paragraph 10.1.6 of the CP, it states that the City Corporation will work with TfL to prioritise investment and accessibility improvements to underground and DLR stations and will seek to identify opportunities to introduce step-free access as part of new developments and major refurbishments. The aspirations of enhanced public transport in the Square Mile are deliverable through working with TfL and other partners.

A clear golden thread is contained through the CP, connecting policies across chapters on similar topics. For example, in the Temple, the Thames Policy Area and the Key Areas of Change Chapter 14, S17 Thames Policy Area (3) looks to promote “the use of the River Thames and its environs for transport and navigation, particularly through retaining Blackfriars Pier, and access to Tower Pier, and encouraging the reinstatement of Swan Lane Pier and the use of these facilities for river transport”. In the Transport and Servicing chapter, policy VT4(2) supports improvements to piers and other river-based transport infrastructure to enable an increase in passenger and freight transport by river, alongside opportunities for new river-based transport. Increased use of the river has the potential to support more sustainable transportation. The policies in Chapter 14 aid in the deliverability of the aims of the transport policies through specifically naming Blackfriars Pier, Tower Pier and Swan Lane Pier. These policies have been written to be aspirational and supportive of any opportunities that may arise for river-based transport.

CP policy VT2(2) states: *“Developments must minimise the need for freight trips and seek to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis. Major commercial development must provide for freight consolidation and use technological and procurement solutions that enable efficient servicing and deliveries to sites”*. Paragraph 10.3.1 of the CP states that retiming of deliveries and collections outside peak periods can reduce congestion, as can consolidation onto fewer vehicles or different types of vehicles. Reducing freight vehicles on the City’s streets can have positive impacts for congestion, air quality and improve the pedestrian and cyclist experience. The aspirations for the policy are able to be delivered through a Delivery and Servicing Plan, as set out in paragraph 10.3.7, which is secured through a s106 planning obligation. For example, 22 Bishopsgate has been undergoing consolidated deliveries and collections as secured through a s106 planning obligation. Data provided by 22 Bishopsgate shows a 96% conversion rate of deliveries, meaning for every 100 vehicles processed at a consolidation centre, only 4 vehicles come into 22 Bishopsgate. This reduction in vehicles as a result of consolidation achieves the aspirations of CP policy VT2(2).

## **Do the policies give clear direction as to how a decision maker should react to a development proposal?**

The policies in the CP are clearly defined and unambiguous and it is evident how a decision maker should react to development proposals. The policies in the CP are aligned with the NPPF which requires plans to contain policies that are clearly written and unambiguous (paragraph 16). As well as the policies being clearly structured and worded, they have been drafted such that they are clearly linked with the relevant environmental, social and economic objectives of the CP and overarching strategic policy.

Policies S9, VT1, VT2, VT3, VT4 and VT5 are positively worded. The policies are split into the policy text, 'reason for the policy' and 'how the policy works'. These three distinct sections for policies provide background and clarity to decision makers and stakeholders on how to interpret the policies.

CP policy S9 is a strategic policy which sets out the approach to transport and servicing, including the direction to the non-strategic policies in the chapter of VT1, VT2, VT3, VT4 and VT5.

Strategic Policy S9 states how the City's "transport infrastructure will be maintained and improved by safeguarding land where necessary, as shown on the Policies Map, to enable the delivery of increased public transport capacity. Proposals which are contrary to the safeguarding of strategic infrastructure projects will be refused". Paragraph 10.1.0 provides guidance that the City Corporation will use its planning powers, alongside its role as a transport authority, and in partnership with TfL to help secure improvements for public transport, for instance by safeguarding land from other forms of development where necessary.

Policy VT1 (4) defines clear numeric thresholds of floorspace for decision makers for when Transport Assessments and Travel Plans are required from developments for offices, residential, retail, hotel, health, transport infrastructure and mixed use land uses. Paragraph 10.2.0 outlines how development has the potential to create significant changes in transport patterns and demands that must be addressed at an early stage of the design process. Any adverse impacts that are identified must be minimised and mitigated through appropriate design and/or management measures. Paragraph 10.2.0 highlights the different roles of Transport Assessments and Travel Plans. Transport Assessments are required to assess the potential impacts of development, while Travel Plans are required to maximise the use of active transport modes and public transport. Paragraph 10.2.5 outlines when planning applications meet the relevant thresholds, a robust transport assessment is required, and an initial highways design general arrangement plan (at 1:200 scale) should be submitted, highlighting the highways works that would form part of a Section 278 Agreement.