



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

Main Matter 16: Active Travel and Healthy Streets

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?

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

The NPPF and London Plan are clear in setting policies and guidance to ensure that development should make the most effective use of land to facilitate trips by active and sustainable modes. The majority of movements in the City are by active travel and the street environment is predominantly geared towards pedestrians, with over 750,000 walked and wheeled journeys a day, as identified in paragraph 10.7.1. The policies in the City Plan S10, AT1, AT2, and AT3 support the future aspirations of active travel in the Square Mile, working alongside the priorities of the City’s Transport Strategy (ED-INF2).

Paragraph 108 of the NPPF (2023 version) makes clear that transport issues should be considered from the earliest stages of plan-making. With regards to active travel, it states that opportunities to promote walking, cycling and public transport use should be identified and pursued (c) and patterns of movement, streets, parking and other transport considerations as integral to the design of schemes to contribute to making high quality places (e) should be considered.

CP policies S10, AT1, AT2, and AT3 seek to improve the quality and permeability of the City’s streets, in ways that enhance inclusion and accessibility, to put the needs of people walking and wheeling first. For example, the CP directly responds to this part of the NPPF with policy S10 stating: *“The City Corporation will work with partners to improve the quality and permeability of the City’s streets and spaces in ways that enhance inclusion and accessibility, put the needs of people walking and wheeling first when designing and managing our streets, and enable more people to choose to cycle in the City”*. The six parts to the policy each have different mechanisms for achieving this, including through applying the Healthy Streets Approach (1), improving conditions (2), expanding the cycle network (3), increasing pedestrian priority (4), improving access routes around stations (5) and implementing enhancements to safety (6). As the City is a predominantly pedestrian environment, and one in which we are expecting increased footfall from higher numbers of office workers and visitors, Policies S10 and AT1 require schemes to contribute to enhanced pedestrian movement and permeability. CP Policy S10 (1) looks to improve the City’s streets and spaces by applying the Healthy Streets Approach in development proposals and improvements to the public realm. AT1(8) follows the strategic direction of S10 by stating that *“the creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant”*. CP policy S10 (4) states that the City’s streets and spaces will be enhanced by: *“implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City’s Transport Strategy”*. The Transport Strategy (ED-INF2) states that new pedestrian priority streets will be introduced across the Square Mile, with opportunities identified within Healthy Streets Plans. . Additionally, CP policy AT2 states that: *“all major development must promote and encourage active travel through making*

appropriate provision for people who walk, wheel and cycle by ensuring suitable access between the development site and pedestrian and cycle routes". Paragraph 10.9.2 of the CP states that Healthy Streets Plans will identify smaller measures and network enhancements for cycling.

Paragraph 110 of the NPPF also sets out some requirements for planning policies, including supporting an appropriate mix of uses (a), be aligned with other strategies (b), and provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (d). Figures 10 and 11 of the CP meet the requirement of NPPF paragraph 110 (b) through identifying proposed walking and cycling improvements from the City's Transport Strategy on page 37 and 78 (ED-INF2).

The London Plan is key strategic guidance for London setting out clear expectations and goals for active travel and healthy streets across its policies T2, T4 and T5. The policies in the CP support and build on the policies in the London Plan. City Plan 2040 is aligned with the London Plan and TfL guidance. The City Plan supports the Healthy Streets Approach, Vision Zero and the aim to enable more people to travel by walking, cycling and public transport rather than by car. LP policy T1(A1) requires new development to support the Mayor's target for 95% of central London journeys to be by walking, cycling and public transport by 2041. CP policy S10 (2) aims to improve conditions for safe, convenient, comfortable, inclusive and accessible walking, wheeling and cycling. By improving the quality, permeability of City streets and spaces to enhance inclusion and accessibility it can help to enable more people to choose to walk and cycle. Paragraph 10.1.0 of the CP states that in the Square Mile, over 90% of commuter travel to the City is by public transport, walking or cycling.

London Plan Policy T2 (B) states that development plans should promote and demonstrate the application of the Mayor's Healthy Streets Approach (B), and should identify opportunities to improve the balance of space given to people to dwell, walk, cycle and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant (2). CP Policy S10 part 1 directly responds by stating that the City's streets and spaces will be enhanced by applying the Healthy Streets Approach in development proposals and the public realm. Paragraph 10.7.0 of the CP also states that the Healthy Streets Approach provides a framework for the City of London's Transport Strategy, which places improving people's health and their experience of using streets at the heart of transport decision making. Paragraph 10.7.2 states that the Healthy Streets Approach has been embedded into the CP to inform strategic decision making and project prioritisation.

Policy T4 (E) of the LP states that the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health should be taken into account and mitigated. As recognised within paragraph 10.9.0, most of the workers in the City journey into work via public transport, completing their journeys on foot. Therefore, CP Policy AT1(11) requests major development proposals to model the pedestrian flow impacts of new development.

LP policy T5(A2) states that development plans should secure the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. The LP states that developments should provide cycle parking at least in accordance with the minimum standards set in table 10.2 and Figure 10.3 of the London Plan. CP policy AT3(1) is aligned with the London Plan, requiring developments to provide on-site cycle parking for occupiers and visitors, complying with

London Plan standards, and encouraged to provide facilities for public cycle parking. Paragraph 10.10.1 states that the CP requires a robust justification for failure to comply with London Plan standards. The Corporation is aware of some of the highlighted concerns of under-utilisation of space provided in accordance with this standard as provided in representations, and is open to discussion at the hearing sessions on how these City-specific circumstances in office buildings could be reflected. Discussions are ongoing with TfL regarding a potential change to the Plan to respond to these issues, and a Statement of Common Ground will cover this point.

Are the policies relating to Active Travel and Healthy Streets positively prepared ‘in a way that is aspirational but deliverable’?

The policies in the CP relating to Active Travel and Healthy Streets are positively prepared in a way that is aspirational but deliverable. The active travel and healthy streets aspirations of the policies in the City Plan are aligned with the aspirations of the Transport Strategy (ED-INF2). Page 18 of the Transport Strategy states: *“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”*. The shared aspirations of the City Plan and Transport Strategy ensures that the deliverability of the policies is supported across the Corporation through the collaboration of multiple teams. For example, in summer 2023 engagement on the City Plan and Transport Strategy was shared to highlight the coordinated approach to policy and strategy in the Square Mile.

Through the alignment of the CP and Transport Strategy (ED-INF2), the aspirations of the CP policies and delivery of projects are shared goals. The Transport Strategy (ED-INF2) is split into aspirational Outcomes and specific Proposals which achieve those Outcomes. ‘Outcome 1: The Square Mile’s streets are great places to walk, wheel and spend time’ has the aspiration to make the experience of walking and wheeling on the City’s streets a more enjoyable and rewarding experience, and a great way to travel and to discover all that the City has to offer. The aspirations of the CP and Transport Strategy (ED-INF2) are shared, so the deliverability is shared too. CP policy AT1(9) seeks to improve wayfinding through new development and public realm improvements, including through opportunities to update, enhance and add to the network of Legible London signs. Both the CP policy AT1 and Transport Strategy (ED-INF2) under Proposal 6 want to update and maintain Legible London maps and directional signs across the Square Mile. Paragraph 10.8.6 of the CP states that financial contributions secured through s106 planning obligations will be used to ensure development contributes to improvements in the wider public realm. Paragraph 10.8.6 states that developers will be required to meet the cost of updates to the Legible London map database which are required as a result of development, and to fund the provision of new Legible London stands, where necessary (CP, 10.8.6). Through the development approvals process, the Planning Obligations team secure income for Legible London from planning applications, such as 120 Fleet Street, 108 Fetter Lane, 101 Moorgate, and 2-3 Finsbury Avenue, while the Transport team determines the locations for the stands. The City of London Planning and Transport teams share aspirations and collaborate on the delivery.

A clear golden thread is contained through the CP, connecting policies across chapters on similar topics. The aspirations of the CP are deliverable because planning applications are already securing

the improvements. For example, the planning application for 99 Bishopsgate proposed an increase of over 1,400 sqm of new public realm. The proposed development for 99 Bishopsgate creates a new route through the site opening up from Wormwood Street through to 55 Bishopsgate to the south, alongside wider links to Liverpool Street station. CP policies DE3 and AT2 share the aspirations of permeability and public realm. DE3(9) ensures that public realm schemes must have regard to the need to improve pedestrian amenity, ensuring that streets and walkways remain uncluttered and encourage walking, cycling and wheeling. Paragraph 9.4.0 of the City Plan states that most streets and public spaces accommodate a high level of pedestrian footfall and perform a variety of functions above and beyond accommodating the movement of people. CP Policy AT2 states that all major development must promote and encourage active travel through making appropriate provision for people who walk, wheel and cycle by ensuring that suitable access between the development site and pedestrian and cycle routes. The chapters and policies of the City Plan share aspirations to ensure deliverability.

CP policy AT1(3) states that development proposals should maintain, and where feasible, provide for an increase in pavement widths aligned with TfL Pedestrian Comfort guidance to ensure that pavements provide sufficient safety, comfort and convenience for the number of pedestrians. Paragraph 10.8.5 of the CP states that Pedestrian Comfort Levels are used to assess the level of crowding on a pavement or at a pedestrian crossing. The level of comfort, which is graded between A+ (most comfortable) and E (least comfortable), is based on the number of people walking and the space available, taking account of street furniture and other restrictions. The CP in paragraph 10.8.5 states that minimum pavement widths should accord to TfL's Pedestrian Comfort Guidance. The CP adds detail to the LP requirement to specifically state that all City pavements should have a minimum pedestrian comfort level of B+. Transport Assessments submitted in support of planning applications should assess the level of pedestrian comfort and should provide a clear justification if any pavements in the vicinity of the development would fail to achieve TfL standards. Planning approvals in the City are achieving the aspiration for increases in pedestrian comfort levels, for example at 55 Old Broad Street the pedestrian comfort level will increase from D to B+.

Do the policies provide 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, for example they are aligned with the Environmental objective that ensures development and infrastructure help transform the City's streets, creating attractive and accessible places to walk, wheel, cycle and spend time, and enabling sustainable transport and active travel.

Policies S10, AT1, AT2, and AT3 are positively worded requiring specific conditions to be met while encouraging additional improvements (eg. AT1 (7) encouraging public access on private land to enhance connectivity). 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 S10 is a strategic policy which sets out the approach to active travel and healthy streets, including the direction to the non-strategic policies in the chapter of AT1, AT2 and AT3.

CP strategic policy S10 (4) states: *“The City Corporation will work with partners to improve the quality and permeability of the City’s streets and spaces in ways that enhance inclusion and accessibility, put the needs of people walking and wheeling first when designing and managing our streets, and enable more people to choose to cycle in the City by: (4) Implementing improvements to key walking routes and increasing the number of pedestrian priority streets as part of the delivery of the City’s Transport Strategy”*. Strategic policy S10 provides direction for other policies in the chapter. For example, AT1 (8) states the creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into account the existing pattern of pedestrian routes and movement and connections to neighbouring areas and boroughs where relevant. AT1 complements the strategic direction of S10 for improved pedestrian movement and access through providing more specific detail such as considerations for new pedestrian rights of way.

CP policy AT2 states that all major development must promote and encourage active travel through making appropriate provision for people who walk, wheel and cycle by incorporating sufficient shower and changing facilities, and locker/storage to support walking and cycling in accordance with the London Cycling Design Standards. A growing number of people are choosing to cycle through and around the Square Mile, as identified in paragraph 10.9.1 of ‘Reason for the policy’. Paragraph 10.9.3 of the ‘How the Policy Works’ section identifies that lockers should be provided at a minimum ratio of 1 locker per 1 cycle parking space and showers should be provided at a minimum of 1 shower per 10 cycle parking spaces. The clear numerical thresholds provide clarity for applicants and decision makers.

CP Policy AT3 (4) states that cycling facilities should be conveniently located, easily accessible, safe and secure. In paragraph 10.10.0 of ‘Reason for the policy’, it states that there is need to encourage more people to cycle into the City and adopt active travel initiatives, to reduce congestion on City streets, deliver improvements in air quality, reduce carbon emissions and contribute to the wider health and wellbeing of City occupiers, residents and visitors. Sufficient cycle parking will be required to meet these needs. The ‘How the Policy Works’ section in paragraph 10.10.1 states that all on-site cycle parking must be secure, conveniently accessible and sheltered, in accordance with the London Cycling Design Standards.