

MI 4. Transport and infrastructure

T1 Strategic transport

Q14.1 Is policy T1 justified, effective and consistent with national policy and the London Plan?

Answer: Yes, the policy approach in T1 is consistent with the London Plan policy T1 and T3 as it

- facilitates the delivery of Mayor's strategic target of 80 per cent of all trips to be made by foot, cycle or public transport by 2041,
- requires developments to protect and enhance the strategic transport network,
- facilitates and safeguards the schemes in Table 10.1 of the London Plan, including the DLR extension to Beckton Riverside and Thamesmead, and future improvements to Stratford station.

T2 Local transport

Q14.2 Is policy T2 justified, effective and consistent with national policy and the London Plan? In particular:

a) The requirement in part 2 for all major developments to provide or contribute to wayfinding, publicly accessible cycle hire provision and car clubs.

Answer: Yes, the requirement for all major developments to either provide or contribute toward Healthy Streets, proportionate to the scale of the development is justified, specifically to improve wayfinding, and publicly accessible cycle hire provision.

Since the draft Plan adopts a car-free policy, the requirement for car clubs should only apply to existing parking spaces in the local area so that additional vehicles are not introduced. Should the provision for car club bays be deemed appropriate and justifiable, developer s106 contributions should still prioritise improvements to active and sustainable travel over free car clubs memberships to future residents.

b) Whether the policy will be effective in meeting the needs of people with disabilities, including through the inter-connection of services.

Answer: Yes, part 1 of the policy is effective in meeting the needs of the whole community, including people with disabilities, as it emphasises on network of well connected neighbourhoods which implies inter-connection of services through walking, cycling and public transport. Adequate blue badge parking is required in car-free areas in line with London Plan policy T6E. In addition, the specific emphasis of the policy on safe, healthy, and attractive neighbourhoods is in line with Mayor's Healthy Streets Approach.

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T3 Transport behaviour change

Q14.3 Is policy T3 justified, effective and consistent with national policy and the London Plan? In particular:

a) The requirement in part 1 for all new development to be car free (apart from the stated exceptions).

Answer: Yes, policy T3 is justified, effective and consistent with the London Plan in creating a car-free policy for all new development, apart from stated exceptions, which includes car/mobility scooter parking for people with disabilities and necessary employment and operational parking as justified. Since most of the new development in the local plan will be in places that are (or planned to be) well-connected by public transport, the car free policy is consistent with London Plan policy T6B which states:

‘Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy’.

b) The statement in part 2 that development that proposes a drive-through will not be supported.

Answer: Developments that propose drive-throughs inherently encourage car-use and can be detrimental to the vitality and vibrancy of town centres and high streets. Additionally, they fail to make the best use of land, which is a key objective of the London Plan. Part 2 of the policy that does not support developments that propose drive-throughs is consistent with the local plan vision and the London Plan policies to reduce car use and make best use of land.

c) The requirement in part 4 (f) for all major employment development to include facilities for washing and changing.

Answer: Yes, the requirement in part 4 (f) is justified and consistent with the London Plan and enables more people to take up cycling. For major employment development which either has floor space of 1,000 square metres or more, or which is 1 hectare or more, it is reasonable to expect provision of facilities of showering and changing when the expected cycling distances to workplaces can be lengthy. This is in line with the London Plan Policy T5 Cycling, paragraph 10.5.7 which states: ‘In places of employment, supporting facilities are recommended, including changing rooms, maintenance facilities, lockers (at least two per three long-stay spaces are recommended) and shower facilities (at least one per ten long-stay spaces is recommended). Accessible facilities for disabled cyclists should also be provided’.

d) The requirement in part 6 (a) for any new development that includes parking to provide EVCP on residential spaces.

Answer: The requirement in part 6 (a) is in line with the 2021 update of Building Regulations, requirement S1, regulation 44D which states for residential buildings that ‘associated parking must have access to electric vehicle charge points’.

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e) The requirement in part 6 (c) for major developments with zero parking on site to provide contributions towards EVCPs in other parts of the borough.

Answer: This requirement is in line with the overarching goal of transitioning to a fully electric fleet of vehicles in London and will further help improve London's air quality and move towards decarbonisation. However, such contributions should not come at the cost of improvements to sustainable and active travel. The Council may want to reference a wider EVCP strategy for the borough or London, towards which these contributions could be used. More information on the Mayor's EV Infrastructure Strategy can be found here - [Electric Vehicle Infrastructure | London City Hall](#).

f) The thresholds for transport assessments in part 7 and Table 15 having regard to national planning guidance¹

Answer: We consider the thresholds for transport assessments in part 7, Table 15 are generally reasonable and in line with the principles set out in Depart for Transport guidance: 'Local planning authorities must make a judgement as to whether a development proposal would generate significant amounts of movement on a case by case basis (ie significance may be a lower threshold where road capacity is already stretched or a higher threshold for a development in an area of high public transport accessibility). '

However, we suggest that intermediate thresholds for Transport Statements (which are mentioned in T3.7) are also added to provide clarity on what is required to support the planning applications and streamline the process.

T4 Servicing and development

Q4.4 Is policy T4 justified, effective and consistent with national policy and the London Plan? In particular:

a) The requirement in part 4 for all development to be designed to enable and encourage servicing using sustainable means, such as using zero emission vehicles and/or cargo bikes.

Answer: The requirement in part 4 is in line with the London Plan Policy T7A which states: 'Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road'. The delivery and servicing trips are on the rise and will continue to increase in the future, therefore it is important that local plan policy requires development to 'enable and encourage sustainable freight'.

b) The requirement in part 5 for developments that service and/or deliver to other locations to ensure that these journeys are undertaken by zero emission vehicles or cargo bikes for 'last mile' journeys.

¹ PPG ID:42-013-20140306.

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Answer: Part 5 of the policy is in line with London Plan Policy T7A as quoted above and paragraph 6.4.7 which focuses on sustainable last mile distribution and logistics: 'All boroughs in the Central Services Area should recognise the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/ logistics.'

T5 Airport

Q14.5 Is policy T5 justified, effective and consistent with national policy and the London Plan? In particular, will it be effective in supporting the operation of London City Airport and its contribution to the wider economy whilst having due regard to social and environmental factors?

Answer: Yes, policy T5 is justified, effective and consistent with the London Plan Policy T8 which 'supports the role of the airports serving London in enhancing the city's spatial growth, particularly within Opportunity Areas well connected to the airports by public transport and which can accommodate significant numbers of new homes and jobs'. Policy T8B requires that any environmental and health impacts are acknowledged and mitigated, particularly related to noise, air quality and climate change.

In our Statement of Common Ground (SoCG) with Newham, we agreed the following modification to policy T5.4 to remove any mention of new Elizabeth line station at the airport. This is because an additional station would likely lead to increased operating costs for TfL without generating further benefits, and potentially disbenefit existing passengers.

'T5.4 The Sustainable Transport Strategy indicates that the Council does not require an Elizabeth line station at the airport to facilitate the levels of growth in the Royal Docks. ~~—however the Council would support a privately funded station to improve access to the airport site'.~~

Policy BFN4 Developer contributions and infrastructure delivery

Q14.6 Is policy BFN4 justified, consistent with national policy and the London Plan, and will it be effective in helping to coordinate the provision of essential new and improved infrastructure with development? In particular:

a) The prioritisation in part 3 of affordable and family housing; local access to employment and training; and then delivery of required infrastructure?

Answer: Part 3 of the local plan policy BFN4 is not consistent with the London Plan Policy DF1 D which states: 'When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:

- 1) recognise the role large sites can play in delivering necessary health and education infrastructure; and

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2) recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth’.

As stated in the SoCG, we do not consider that the flexibilities provided by the policy BFN4 implementation text are sufficient to ensure soundness and consistency with the London Plan, and we recommend that more specific changes as suggested in our Regulation 19 response are made to the policy to prioritise funding of transport infrastructure to align with London Plan policy DF1 D.

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