

## **The Mayor of London's and Transport for London's response to the draft National Model Design Code consultation (Question 15 of the NPPF consultation)**

**We would be grateful for your views on the National Model Design Code, in terms of a) the content of the guidance b) the application and use of the guidance c) the approach to community engagement.**

### **Summary**

The Mayor welcomes and supports a greater use of design codes to proactively plan for future development. The emphasis on design quality and placemaking to create sustainable places is strongly supported. The design-led approach to development is central to the London Plan 2021 and it encourages London Boroughs to prepare area-wide housing design codes to proactively increase housing provision on small sites and promote incremental development. As part of this approach, the GLA has already prepared and consulted on the Good Quality Homes for All Londoners guidance that overlaps with many of the issues identified in the National Model Design Code (NMDC) in a way that is specifically appropriate for London. This document provides guidance to boroughs on producing area design codes and provides example design codes for small sites and other key locations that are most appropriate.

The Mayor's consultation response is set out in detail under the heading on the content, application and approach to community engagement. Below is a summary of the key points made in this consultation:

- The Mayor welcomes the design coding process outlined in the guidance but has concerns about local authority capacity and resource to undertake such a resource intensive exercise. Further resources and training will be necessary to ensure that design codes are of the highest standard.
- The focus of a map-based coding plan is supported but further clarity should be provided on the expected coverage of design codes within a local authority area and their place within an LPA's planning framework.
- The detail provided in the Guidance Notes for Design Codes is welcome. However, it would be useful to provide further clarity and guidance on how design codes should be expressed in LPA documents and how these codes should be used by development management officers to assess development proposals. Without this, the effectiveness of design codes could be weakened with poorly written codes being produced and accessed.
- The focus on carrying out a baseline analysis and developing a design vision is strongly supported. However, there are questions around how design codes will work alongside other planning documents and the timing and sequencing in relation to these documents and the LPA's overall spatial strategy. If not considered holistically, there is risk that meaningful community engagement will not be possible and the design codes could be contradicted by existing policy.
- It would be useful to include a range of exemplar design codes to give additional clarity and understand what a good design code contains.

## **a) the content of the guidance**

### Design code process and role of the Local Plan

The Mayor welcomes the proposals to base design codes on a thorough analysis of the local area and develop an area wide design vision through an analysis, vision and code/guidance process. Re-establishing good principles of urban form such as well-proportioned streets, clear building lines, a hierarchy of routes, safe and active ground floors, and accessible open spaces is strongly supported. It is also welcomed that the guidance does not dictate any architectural style. Although reference to ideas of 'locally accepted' beauty may inadvertently result in discouraging modern architecture, which can be as well-designed and well-loved as traditional styles. The term 'beauty' should also be recognised as a subjective term. The NMDC highlights the importance of 'enclosure ratio', street sections and minimum privacy distances i.e. distances between buildings and the appropriate width of streets/spaces which is strongly supported.

The guidance should clearly recognise the importance and impact of local plan policies in the formulation of the vision at this stage. It is the role of the local plan to establish the vision and policy requirements for development across of the whole LPA, and area or site design codes need to help translate these into more detailed vision and design parameter for the development of an area. As the NMDC is currently drafted there could be a conflict between the role of the local plan and an area design code. The role of the Mayor of London and other strategic authorities should also be recognised in the NMDC. In London, the London Plan forms part of every LPA's development plan and thus it also informs the local vision for development and its policies will apply to development facilitated by design codes, this two-tier system should be recognised.

It is important to recognise that the character of places with significant potential for growth/change, like many Opportunity Areas (OAs) in London, are difficult to neatly capture and 'fix' for years in advance with everyone agreed. OAs, for example, are often very large (too large to use the 'development areas' in the NMDC) and may contain places that will be absolutely transformed in the future. The NMDC does acknowledge that design codes will be produced at different scales over time to steer development as required. However, it would be useful to set out the relationship between character studies/appraisals/guidance and the duration of Local Plan/supplementary guidance more clearly to ensure flexibility is possible where required.

### Structure of the document and use of case studies

The structure of the guidance, which is split across two documents, is at times difficult to follow. In particular, there is a lot of duplication and repetition across the two documents and a revised structure may be more appropriate. It is also not clear that section 3a and 3b work as intended as there is so much overlap between them.

It would be useful to include a range of exemplar design codes to give additional clarity and understand of what a good design code contains. These examples should illustrate what design codes look like when combining all the key issues rather than

just showing them dealt with separately, as in the current version of the NMDC and guidance. The pilot case studies over the coming months could be used for this purpose providing they cover a range of built form scales and area sizes.

### Area types and tall buildings

The Mayor supports the guidance's approach to a coding plan and the division of a locality into a series of area types. The description of the area types sometime list heights and sometimes density. It would be better to reference height in all. The use of dwellings per hectare is a poor indication of the built form in existing urban areas (e.g. a single house could be one dwelling or subdivided into 4 dwellings). Therefore, if density is to be used to describe an area type, another measure of density should be used such as site coverage ratio/plot ratio and floor area ratio (FAR) as these provide a more meaningful measure of density/pattern of development.

The description of the 'high-rise city' area type states that it would be an area where there could be no limit on building heights. However, it is extremely unlikely for there to be the case that unlimited height is possible. For instance, environmental/heritage/land use issues tend to arise as building heights increase which in turn can help to set height parameters. Therefore, it is suggested that the text referring to 'no limit' on building height for this area type be removed.

While it is understood that these area types are just examples for illustrative purposes, for a large city like London, further 'urban' area types are considered to be necessary to capture the full range of urban area types. An example could be another 'urban' category between town/city centre and 'high rise' city which encompasses urban typologies such as mansion blocks and medium-rise flatted development. One difference between this area type and the town/city centre area type would be that it has less of a focus on mixed uses.

### Viability and deliverability considerations

There is no mention of viability and deliverability within the NMDC and the impact that these parameters have on development. The guidance should recognise that design codes can have significant impact on land values and therefore the viability of development. By failing to account for viability and deliverability, design codes could be 'trumped' by viability arguments, and/or impact on the deliverability of development. Low viability can ultimately affect the detailing and quality of finishes resulting in a poor-quality design. National policy should recognise that when developing design codes, LPAs should identify optimum forms of development for the relevant area in terms of design and deliverability. For instance, tall buildings may not be appropriate in lower value areas where high construction costs can impact on the deliverability. Design codes should optimise the capacity of sites in a way that best delivers the objectives of the development plan, in terms of good design, addressing housing needs and ensuring that development is deliverable.

### Accessibility

While the NMDC acknowledges that accessibility needs to be designed in from the start, as a 'golden thread' running through the scheme, there are still a number of

concerns relating to how design codes will be illustrated in an accessible way for all as well as ensuring that the design codes themselves consider their impact on those with disabilities. Further detailed comments on accessibility are included in Appendix A.

## Movement

The Mayor strongly supports the prominence given to movement in the design guidance. Perhaps the most fundamental aspect of sustainability is the integration of transport and land use planning which enables well designed places at densities that support a vibrant and attractive mix of uses, including opportunities for employment.

Nevertheless, the NMDC does not adequately respond to the context and challenges faced by large and dense urban areas such as London. To cater for growth, large cities must ensure new development minimises travel by car and enables densities which support the provision of public transport and other significant sustainable transport infrastructure. This can only be achieved through explicit support for prioritising people walking, cycling and taking public transport over those driving, otherwise policymakers can point to national guidance which states that streets should be convenient and attractive for people driving to justify maintaining the status quo, which prioritises vehicles over people (including the significant opportunity loss of parked vehicles).

The recently published DfT evidence base for the Transport Decarbonisation Plan highlights the importance of parking reductions to changing travel behaviours and, as such, national guidance should not be agnostic about car parking, especially in urban areas. Explicit support for car free development and cycle infrastructure integral to highway design is needed within this page alongside support for maximum parking standards, ideally with complementary changes to the NPPF. Further detailed comments on movement are included in Appendix B.

## Nature and Resources

The Mayor welcomes the inclusion of the energy hierarchy and energy efficiency standards. However, it is unclear how the proposed changes in the Future Homes Standards and Future Buildings Standards interact with and are reflected in design codes. Some uncertainty remains on the extent to which LPAs will be able to apply local standards and requirements to ensure that there are no reductions from current standards, such as those applied through the London Plan 2021, in the transition to zero carbon development.

The inclusion of neighbourhood energy issues and embodied energy are also welcome, however the term 'embodied carbon' is often used to refer only to the carbon in the materials. Therefore, it is suggested that the definition of Whole Life-Cycle Carbon (WLC) as set out in the London Plan 2021 encompasses the whole lifetime of the materials and their extraction/construction and end of life in a more holistic way. It is also recommended that the term 'low energy network' is replaced with 'low carbon energy network' for clarity.

In addition, it is suggested that the green infrastructure paragraph (in the nature section in 3a) could reference the Urban Greening Factor (UGF), as described in the London Plan 2021, as a way to set standards for the quality and quantity of urban greening required in a new development. Under the N.3.i Biodiversity Net Gain (within the guidance notes for design codes document), the guidance states that design codes will be expected to reflect the minimum 10% net increase in biodiversity compared to the situation prior to development. This approach may be overly simplistic and may underdeliver on improvements to biodiversity for urban areas like London, particularly where the existing biodiversity baseline is low. It is therefore suggested that in practice, the Urban Greening Factor (UGF) tool will provide the most suitable framework for delivering improvements to green infrastructure and better outcomes for biodiversity gain. The inclusion of street tree design principles is also supported.

The Mayor questions why green infrastructure and play space have been combined a number of times within the guidance (such as in section N.1.ii of the guidance notes)? While there are obviously strong links with parks, playing pitches and other play spaces, at smaller scales and in the case of formal sports or play provision this will not always be predominantly green or 'open'. The London Plan 2021 policies and guidance for instance, do encourage multifunctional green infrastructure that can be part of play space, but notes clearly that the needs for green infrastructure/open space and play space are distinct issues that are required to be addressed separately. Lastly, paragraph 66 notes that standards related to sustainability *could* be incorporated into a code or covered in other policies. It is suggested that sustainability *should* be integrated into codes as this will give these aspects more weight and clarity.

## **b) the application and use of the guidance**

### Local authority resource and training

The 'Who is Responsible?' section on page 90 is a good comprehensive list of who should be involved in the production of design codes. Nevertheless, this raises the fundamental question about how the production and management of design codes will be adequately funded and resourced by local authorities. Producing design codes will be very resource intensive, especially where extensive public engagement and consultation will be required to meaningfully inform their development. These design codes will require intensive planning and resource management from experienced practitioners in order to be effective and it is not clear how local authorities will be able to deliver on these processes. At the level of the neighbourhood or even the whole local authority, this would require vast resource.

Since 2014, the Mayor of London has surveyed London boroughs every two years, to see what place shaping capacity they have. The results have helped the GLA to develop new programmes to support boroughs, such as Public Practice, and is crucial to the delivery of the Good Growth by Design programme. The key findings highlight that capacity is stretched with the average place shaping team 19% smaller

than in 2014<sup>1</sup>. Findings also showed that capacity was not evenly spread across London and within teams and that expertise within place shaping teams were weighted towards the fee-earning planning application processing staff, rather than those making plans or bringing in specialist skills.

For local authority staff with no experience of producing design codes, assessing an application against a design code will be a barrier to implementation. Training will be necessary and local authority officers would need to be upskilled in producing and assessing design codes. It is therefore essential that additional funding and resources is allocated so that design codes can be produced and managed to a high standard. Without clarity on where this additional resource will come from, it is likely that policy/design code 'vacuums' could appear. This could lead to poorly managed or produced design codes and the permitting of poorly designed schemes if there are inadequate design codes in place.

### Prioritising areas for design codes

Finding the right sites for development is a critical first step in delivering well-designed places and it will be important, to some degree, for local authorities to prioritise areas for design codes. It would therefore be useful for the guidance to clarify how LPA's should prioritise different areas for design codes if it is not possible to create a coding plan for the entire local authority area. Should areas with site allocations or areas undergoing significant change be prioritised in these cases? This could ensure areas with the most pressing need are covered by a design code as opposed to neighbourhoods that can self-fund a design code or with the most political influence. Clarity should be provided on the expected coverage of design codes within a local authority area. The NMDC also suggests that developers or neighbourhood groups may use the document to develop their own codes at a 'locally determined' level of detail. There is scope for a lot of confusion here, potentially leading to the creation of a comprehensive but superficial set of codes or alternatively a patchy application on selected sites by various parties. In London for instance, areas with an adopted Neighbourhood Plan tend to be more affluent. There is a concern that in the future, this could also be reflected by the coverage of design codes.

### Impact on Development Management

The NMDC sets useful, sensible, and laudable principles for design. These already exist in large part in the London Plan 2021 and associated guidance but re-stating the importance of design in the NPPF and NMDC is supported. The section on identity and the key aspects of masterplans, buildings, and spaces is well considered and helpful. The emphasis on design quality in national planning policy strengthens the ability of LPAs to make planning decisions and contest appeals based on design quality.

Nevertheless, an opportunity for more progressive guidance that grapples with real issues of sustainability and inequality has perhaps been missed. For instance, there

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<sup>1</sup> The full survey findings are available at <https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/helping-london-local-authorities-deliver-good-growth>

is little mention of designing for future adaptability/flexibility/innovation. While the NMDC offers strong guidance for new developments, it does not say enough about the design quality and potential for design codes on retrofits/repurposing/refurbishing of buildings. It is not clear how design codes will be applied to these types of developments. Design codes could also be used by some LPAs as means of restricting height/density that is not justified by the local plan or area analysis.

While the guidance contains substantial detail on the different elements that will form part of a design code, there is a lack of detail on how design codes will be expressed and therefore assessed. In this respect, it is necessary for the guidance to include a section on the formalisation, implementation and management of design codes as this appears to be missing from the guidance. This is an area that is covered in the 'Preparing Design Codes: A Practice Manual' 2006 document, which details guidance on how design codes should be expressed and written. For instance, in the 2006 guidance, the document advises using the verbs 'to', 'will', 'shall' or 'must' for mandatory design code requirements and 'should', 'may' or 'can' for discretionary requirements. It would therefore be useful for the NMDC to detail how it intends for design codes to be expressed in local authority documents. This will also help ensure that local authorities strike the right balance between the elements of a design code that are mandatory and those that are discretionary or optional. This will be an important step to ensuring design codes set enough certainty and clarity while providing a degree of flexibility where necessary. Overly restrictive codes could for instance stifle innovation and lead to large parts of an LPA becoming uniform or 'standardised' and a tendency for pastiche architecture. Guidance should also be provided on when and what aspects of a design code could contain design options in order to get the best out of a design code.

### Impact of permitted development rights (PDR)

The Mayor supports the creation of mixed-use places that encourage sustainable development which is well connected to a range of services and shops. However, it is questioned how this would work alongside the permitted development rights that allow the automatic conversion of non-residential units into residential units? These permitted development rights could undermine the effectiveness of design codes that have a mix of uses. For instance, it appears feasible that an area could be design coded for a mix of uses, only for the non-residential uses to be converted into residential dwellings once a development is completed. In addition, the permitted development rights that allow the additional storeys to existing building could also conflict with and undermine the operation of a design code. In addition, the image on page 26, showing a range of uses that have been design coded for, requires amending. This is because these different uses cannot be separately coded for as they will all fall under the new use class E. It is misleading to show an image implying that these different uses can be coded for.

### **c) the approach to community engagement.**

The Mayor strongly supports the involvement of community groups from the outset with training provided and the use of multiple engagement methods to meet the different needs within communities. The approach set out in the guidance is a good practice approach and appears to sit at the heart of the process. There is emphasis on community members being involved at all stages right from the start and training for community groups on design codes which is supported. Nevertheless, the Mayor would welcome the section on community engagement to be presented at the start of the guidance, rather than at the end, to highlight its importance throughout the process, and for community engagement to be embedded throughout the process. When referring to the term 'hard to reach' groups, it is suggested that this be replaced with 'seldom heard' groups and it be emphasised that local authorities need to make their local engagement accessible and representative.

It is suggested that more guidance be provided on targeting engagement to reach particularly groups, who are usually under-represented in engagement and consultations. More guidance should be provided on the best methods to encompass the views of 'new' residents as well as the existing communities. This is particularly problematic in urban areas, where multiple overlapping communities exist, including 'new' as well as existing residents. The guidance should stress the need for a representative participant group when carrying out community engagement and consultation which may involve some outreach and training for specific groups of the local community. It is important that multiple methods of engagement are provided to meet the needs of different groups, recognising that particular groups, such as disabled people and people on low incomes are less likely to be online.

Sufficient resources are needed for meaningful engagement. A template training offer should be provided to support boroughs to develop community groups understanding, including of design codes and the planning system. This could be developed through a 'design champion' role in communities. It is key that resources, including funding, is available to support community groups meaningful engagement. The role of neighbourhood planning groups should be further explored and promoted.

All stakeholders involved in formulating design codes and developing and assessing planning applications should be trained on the requirements of the Equality Act 2010 and Public Sector Equality Duty. An Equality Impact Assessment template and guidance should be shared in relation to planning engagement and consultations. The needs of different groups, including for small scale plans, should be considered. An Equality Impact Assessment should be completed as part of the development of the design code and all planning applications.

Nevertheless, methods suggested in the community engagement section are supported and potentially enable some real deliberation and intelligent collective 'working out' of the code, alongside more general opinion-gathering and consultation. The document indicates an awareness that engagement means far more than consultation and the emphasis on designing the engagement method itself with participants, and on the need to evidence their opinions and support is also supported.



Good practice community engagement examples should be shared with boroughs and stakeholders. Templates for engagement and consultation exercises would be helpful to address resourcing issues and to support meaningful engagement. Accessible templates should be made available to support engagement. This could include easy read posters and leaflets and videos with sign language interpretation and captions. Useful resources on engagement could be shared, including guidance on collecting demographic information and analysing consultation responses. It should be made clear that feedback should be provided on what changed as result of people taking part ('You Said We Said').

### Sequencing and timing of design code work

There is a lack of detail on how design codes will relate to other consultations and engagements (such as the local plan etc.) that the LPA is required to do. Would the design code engagement for instance be a separate exercise, or would the expectation be that it forms part of/within other plan and policy productions as they come up for review?

Different engagement and/or consultation exercises (e.g. masterplanning for development sites and local plan consultation etc.) risks creating confusion and add significant time required to understand, which may discourage people from taking part. Information on the process needs to be made clear and accessible.

Therefore, more guidance should be included regarding when design codes should be consulted on and how the design coding process should work with/alongside the production of other planning documents. As highlighted in the GLA's consultation response to the Planning White Paper, the Mayor is concerned that the quality and efficacy of the codes will be compromised if they are prepared at the same time as preparing the local plan. This could impact the level of community engagement. It is therefore suggested, that it would be appropriate for the design coding process to follow on from the production of local plans and area-wide frameworks. The local plan and frameworks could therefore be used to focus and articulate the design vision as well as providing some of the site analysis work.

It is likely that there will be a degree of conflict-resolution/mediation between differences of opinion within the community. Providing the community is not just being consulted, but has some real agency, how does a genuinely representative community view of what good design is emerge? That will need to be achieved in an accountable, transparent and negotiated way much of the time. There are good techniques to mediate these unavoidable issues, but – again - they will take time and resource. And at the moment the document doesn't seem to really acknowledge that there may be strong differences of opinion within communities.

## Appendix A: Detailed accessibility comments

The importance of accessibility and understanding equality impacts should be further reflected throughout both documents. Accessibility should be considered throughout the development of design codes regardless of the context and scale of development. It should be reflected in the LPA vision statement, development site masterplan, guidance for area types, toolkit of housing tenures, baseline analysis and in the Homes and Building standards sections. The Public Sector Equality Duty (PSED), under Section 149 of the Equality Act 2010, requires decision makers to take into account equality impacts and mitigate for negative equality impacts on protected groups. Whilst it is positive to see the PSED referred to in the documents, equality impacts should be considered throughout the process, and key considerations/possible impacts should be demonstrated more clearly.

The documents should refer to disability using the social model approach, recognising temporary, invisible and fluctuating conditions, and the importance of quality design in creating accessible inclusive environments for disabled people. The location and size of street furniture can negatively impact older people, disabled people and people with prams/pushchairs and this should be clearly highlighted in the documents. The guidance should make it clear that visual map-based codes need accompanying text to support understanding and alt text for images is required in accordance with the Public Sector Accessibility Regulations 2018. A list of acronyms should be included in the document too.

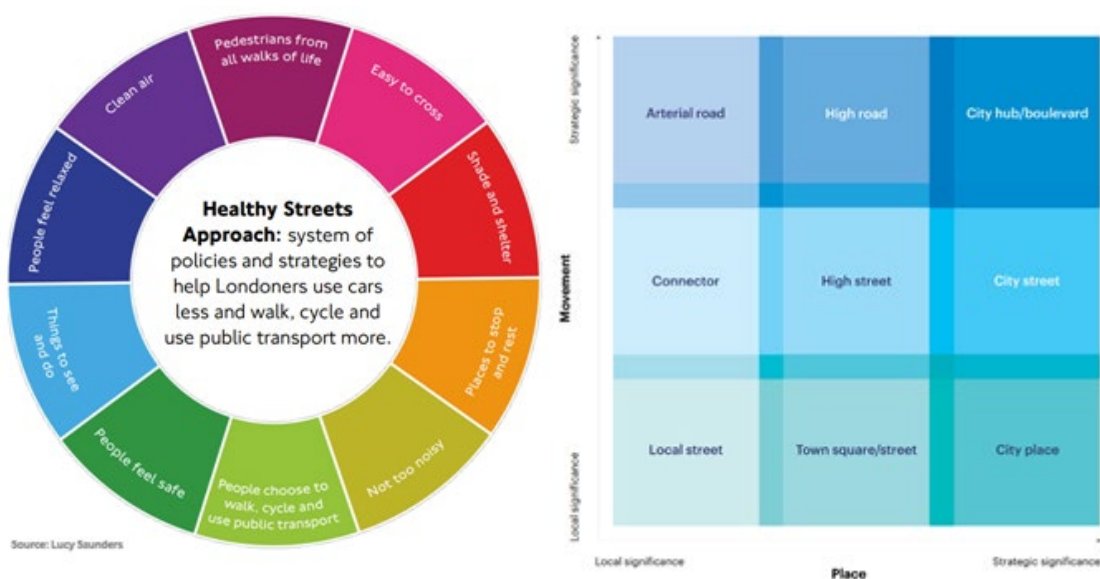
Within the NMDC guidance itself, consideration of play equipment for children with disabilities as well as dementia friendly design principles should be further advocated. In the Homes and Buildings section, it is key that local policy requires Category 2 or 3 levels of accessibility. A cap should be imposed on the amount of M4(1) accommodation proposed in an area, as highlighted in the Mayor's [response](#) to the recent MHCLG consultation on raising accessible standards for new homes. The requirement of 10% M4(3) and 90% M4(2) accessibility standards has been embedded in London's development industry. These targets should be introduced nationally to address the chronic shortage of accessible homes, address the needs of the ageing population and reduce costs to health or social care in the future, by enabling people to live independently for longer. Fire safety and emergency access should also be included in the table set out in Figure 2 (Design code coverage) to ensure that development proposals achieve the highest standards of fire safety. The specific needs of protected groups in relation to housing should be considered, and good practice examples should be referred to. For example, the importance of considering the needs of intergenerational families should be highlighted, with examples included such as Stamford Hill.

## Appendix B: Transport for London detailed comments

### M.1 Connected places

#### M1.i The Street Network

TfL strongly welcomes the promotion of streets that facilitate direct routes for people walking and cycling and which reduce walk distances through their design. This has the added benefit of improving accessibility to the public transport network, which can enable higher density development (e.g. through PTAL). The use of street hierarchies is also welcome, although flexibility in how these are developed is necessary to relate the Design Code to the local context. For example, London has various ways of considering streets which can operate in parallel, e.g. the Street types framework and the Healthy Streets Approach (Figure 1). The former enables designers to consider both the movement and place function of a street to categorise them into a hierarchy, whereas the latter applies to all streets and identifies where improvements can be made to make a street 'healthier', even where the place function is low and the movement function is high.



**Figure 1: The Healthy Streets Approach and London Street family**

TfL suggest that both the guidance and NMDC recommend that local streets be designed for access rather than through traffic from the outset. This will avoid controversy and divisions between those wishing to travel actively and those wishing to drive; and will ensure that local streets remain local in an age where navigation systems treat them as thoroughfares that can avoid signaled junctions or congestion on primary streets.

## M1.ii Public transport

TfL also strongly welcome new development being in close proximity to public transport and consider this fundamental to the sustainability of growth. It should be clarified that access to public transport is measured by walking and cycling rather than by car, especially in urban areas. This avoids provision of car parking near public transport hubs, which would 'waste' valuable land that could be used to create vibrant, high density places.

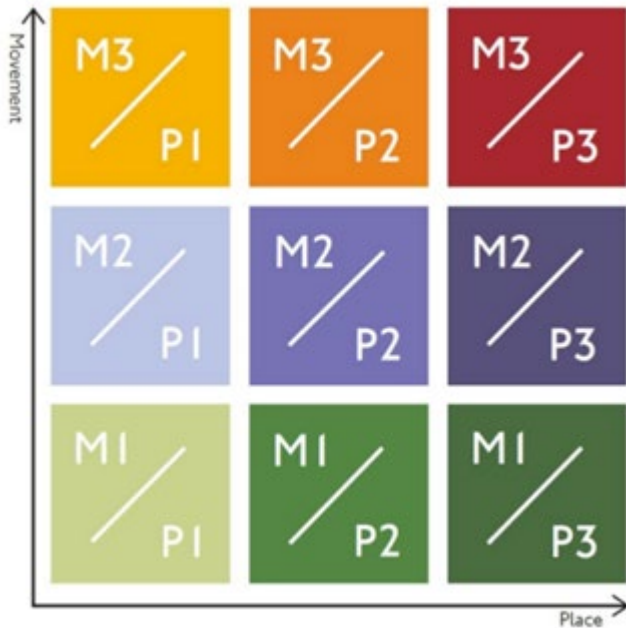
TfL recommend that the frequency of public transport services (both rail and bus) be a factor in determining how sustainable a development is, and what densities are permitted. This is reflected in London's accessibility measure (PTAL). Furthermore, it would be useful to consider cycle access to stations and stops so that planning access is integrated, e.g. identifying the need for additional cycle parking at stations as new development is proposed. This could be reflected in Figure 5 of the NMDC.

TfL also recommend that the bus and cycle networks be considered in parallel when planning new streets, as this will impact street width requirements should provision for bus priority and cycle lanes be required.

## M1.iii Street hierarchy

TfL welcome the use of a street hierarchy that provides some definition of the expected design of surrounding land use and public realm. Figure 28 in the NMDC emphasises the amount and type of traffic movement allowed to define whether a street is primary, high, secondary or local street. An equal emphasis on the 'place' function of a street should be included as streets make up 80 per cent of the public realm and are therefore fundamental to the experience of cities and towns. Some streets are primary for movement and also strategic destinations, hence a hierarchy that identifies both movement and place functionality of a street will provide more flexibility and recognise the multifunctional role of streets.

As illustrated in Figure 2, 'M3/P3' would be a primary street that facilitates significant movement, but is also significant as a place, and a design code could identify priorities in such situation to create a healthy street that allows for both. Creative design and clear prioritisation would be needed to address such situations in a sustainable manner. For instance, such a street would benefit from lower car use, while allowing sustainable freight, public transport and safe walking and cycling with places to rest and enjoy.



**Figure 2: A street hierarchy recognising movement and place**

## M.2 Active travel

### M2.i Walking and cycling routes

TfL strongly welcomes the prioritisation of active travel in the design code guidance, as well as the requirement for considering protected characteristics when planning and designing streets. Data from the London Travel Demand Survey shows that women and disabled Londoners are more likely to travel by foot or bus compared to men and non-disabled Londoners and, respectively, use these two modes most frequently. Data also shows that young children, older people and BAME Londoners are all more likely to suffer the consequences of road danger compared to other groups so, safety improvements and reducing the dominance of motorised vehicles on streets will disproportionately benefit these road users.<sup>2</sup>

TfL also welcomes the requirement for streets to be designed with inclusion in mind. It would be useful here to refer to the need for pavement parking to be considered explicitly non-inclusive and therefore designed out from the outset.

Regarding LTNs, as stated above, there is a missed opportunity here to promote these as standard for new streets. This is important given the reliance of people driving on navigation systems that will undoubtedly seek to exploit new connectivity and undermine the notion of not having through traffic on local streets. This approach also benefits from avoiding the controversy associated with LTNs delivered once travel behaviours have become settled.

<sup>2</sup> <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf>.

## M2.ii Junctions and crossings

While TfL recognise the need to plan and design for all users, there is an inherent tension in creating streets that are 'convenient and attractive for all users'. For example, a street that is attractive to people walking and cycling will not include parked vehicles as these increase crossing distances, create barriers and potential dangers, and reduce the space available for dedicated cycle lanes and/or bus lanes. Likewise, a street that is attractive to people driving will have higher speed limits, with little traffic calming, a plethora of parking and priority over other modes at signalised junctions or roundabouts.

This guidance would be more useful if it were to more clearly acknowledge these tensions and point to the need to prioritise vulnerable road users and those using sustainable and space-efficient modes. This is particularly important in the context of cities where even in the suburbs car travel causes significant harm to journey times and quality of place through creating congestion.

## M.3 Parking and servicing

### M.3.i Car parking

In the NMDC, TfL welcome the reference to standards set in local plans, although these can be and are set at the London, or regional, level as well. Given the strategic nature of traffic generation and management, this must continue to be the case.

TfL also welcome references to car parking design, particularly reducing vehicle dominance on street. However, 'new provision should...' assumes development will provide car parking, which will often not be the case in London and elsewhere, particularly in 'town centres' and 'urban neighbourhoods'.

TfL welcome the acknowledgement of the impact car parking can have on a place, including how people travel to, from and through it. We welcome reference to local parking standards and the option of maximum standards. The NPPF should be amended to reflect this, as it currently discourages local authorities from introducing maximum standards, despite the significant beneficial effects on design this can have. For example, it is incredibly difficult to accommodate even one space per dwelling at moderate to high densities without significant design and/or cost implications. At 275 units per hectare, one space per dwelling would require roughly half a hectare of space to accommodate it (assuming 11 sqm per space plus 7 sqm for circulation). Even within a podium, parking can take up most of the ground floor at even lower densities if active frontages are also accommodated. Basements are an option but have design implications due to access ramps and significantly increased construction costs (particularly if more than one level is required to accommodate a high ratio and high density). This could impact build-quality decisions, reduce contributions to affordable housing and necessary infrastructure, or reduce the amount of cycling parking that is viable.

TfL do not necessarily agree that ‘well-considered parking is convenient... and attractive to use’. In a dense urban setting, it is necessary to prioritise the safety and convenience of those walking, cycling and taking public transport over how convenient it is to use car parking, such as where it is located relative to developments/the street. This is a necessary part of encouraging sustainable modes over car use and was reflected recently in evidence published by the Department for Transport.<sup>3</sup>

We do, however, welcome the distinction between unallocated and allocated parking, and the potential need for controlled parking zones. The diagram of ‘urban’ parking options for higher density areas visualise our previous point, whereby significant amounts of land/space is given over to storing vehicles (particularly the multi-storey example). Authorities in high-density areas need to be able to manage this proactively to ensure better design, and this is best done through maximum car parking standards, underlined by a restraint-based approach in policy.

### M.3.ii Cycle parking

TfL welcome reference to different types of cycle parking, i.e. short-stay for shoppers versus long-stay for residents. However, we are disappointed not to see the same level of detail afforded to cycle parking as to car parking, given how critical this space is for enabling sustainable travel. As well as the design of cycle parking areas themselves, more detail on how sites can be designed to accommodate the right levels of good-quality cycle parking should be provided. The London Cycling Design Standards contains details for the design of good quality cycle parking.<sup>4</sup>

We welcome reference to converting car parking to bike pods/cycle hangars, although these are most useful for existing homes, rather than new development which has the opportunity to design in cycle parking from the outset.

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<sup>3</sup> <https://www.gov.uk/government/publications/switching-to-sustainable-transport-a-rapid-evidence-assessment>.

<sup>4</sup> <https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit#on-this-page-2>.