Publica comments

Page:	Policy GG2 Making the best use of land
Section:	1.2.5

While demand for residential building is very much an urgent policy issue, liveable and resilient neighbourhoods depend upon the diversity and density of land use. Both the creation of new neighbourhoods and the densification of existing areas will need to focus on promoting a mix of uses. Diversity of use enables areas to become real places rather than dormitory towns, transport-terminus areas only to be passed through, or office-dominated landscapes that lie empty on weekends. Land-use planning should focus on providing a genuine mix of uses in an area, and any masterplan should consider how to enable growth in an integrated way that maintains diversity and avoids siloed development in the future.

Creating intensively used neighbourhoods, with a diverse and genuine mix of uses and housing types which caters to a variety of types of people, is the most appropriate way to meet London's housing need without losing the character of the diverse neighbourhoods which make up the city.

Publica supports the careful integration of housing and infrastructure developments. The creation of new transport hubs can unlock new areas for the creation of liveable urban neighbourhoods, which bring work, amenities, and home closer together. However new developments should identify and provide the type of housing that is actually needed in the area, in terms of architectural style, size, tenure and genuine affordability.

It is important that neighbourhoods have a mix of uses that contributes to a local identity, rather than 'identikit' developments, dominated by residential uses, with a small branch of a major supermarket. Diversity of use enables areas to become real places rather than dormitory towns, transport-terminus areas only to be passed through, or office-dominated landscapes that lie empty on weekends. Land-use planning should focus on providing an appropriate and locally sustainable mix of uses in an area, and any masterplan should consider how to enable growth in an integrated way.

We welcome the prioritisation of commercial development in these key business areas, but suggest that this could be extended to cover specific areas of the West End. As London grows, the Central Activities Zone (CAZ) will be of critical importance. As part of our work developing a *Future for the Oxford Street District* (2017), in partnership with Gerald Eve and Volterra, we suggested that residential use should no longer be the priority use across the Oxford Street District and that commercial uses should be given priority in this area.

In this part of the CAZ, one of London's two international retail districts, there is a loss of vital commercial floorspace when it converts to residential use, and because it rarely reverts back to residential use, this represents a a permanent loss of floorspace.

While we recognise the decision by some boroughs including Westminster to use Article 4 directions to protect commercial floorspace in the CAZ, we would welcome the comittment to this at a higher, GLA level.

We welcome the focus on freight, which makes up an increasingly large proportion of motorised vehicles on London's roads. We recommend that the timing of deliveries, where possible, is not limited to new developments, but is expanded to existing neighbourhoods.

Discussions about the future of Oxford Street illustrate the relevance of this clearly; it has been debated whether or not the street should be closed to traffic 24 hours a day or only between 10am and 10pm, to allow servicing traffic to use the street outside of peak hours.

We would welcome the GLA taking action to further support boroughs, BIDs, Great Estates and other stakeholders to learn from best practice and innovate in waste, freight and servicing consolidation. This issue is vital to the creation of inviting streets for pedestrians and cyclists, not dominated by vehicles, a key aspect of the Mayor's Healthy Streets Agenda.

We support greater adaptability in buildings, encouraging sustainability and enabling them to better serve future populations with differing needs. However we would welcome efforts to increase the adaptability and flexibility of both internal and external spaces in existing buildings. Our 2017 report for the New West End Company, *A Future for the Oxford Street District*, proposed allowing buildings to incorporate the widest possible range of uses - including workspace, experiential retail, and culture - to animate the public realm and equip the district to thrive, despite changing shopping habits.

A key aspect of our findings was the importance of encouraging an increase of activity throughout the day, lengthening the hours during which the street remains animated into the evening and night time. Our work highlighted significant potential for the integration of secondary uses within existing locations, for example bars, cafés and events spaces within shops. This idea has already been piloted by Selfridges and other department stores, and would allow such locations to bridge the divide between daytime and night time uses.

Page:	Policy D1 London's form and characteristics
Section:	3.1.2

Publica welcomes the recognition of the importance of the relationship between quality of buildings and the public realm. While what goes on upper floors in most cities is typically for the benefit of the users, occupiers and owners of individual buildings, ground level activity is for the city. Animating the ground plane and creating a sense of civic identity is key in designing infrastructure to create better places to live and work.

Historically, transport and travel infrastructure took the form of grand civic gestures. These feats of engineering, such as Kingsway's underground tramway and Bazalgette's embankments, were not hidden away. Instead they were celebrated with grand public spaces that were intended to inspire the public with a sense of citizenship and civic identity. Transport, movement and the public realm were in this way closely tied together. We would support an approach which considered the civic impact of new developments, whether buildings or infrastructure.

Page:	Policy D1 London's form and characteristics
Section:	3.1.6

Publica supports the principle that states that people should choose to walk and cycle, and understands that the design of streets will be important to this.

Car free places, and places where they are limited can not only have immediate benefits for the public realm such as improving air quality, and providing increased safety for pedestrians and cyclists, but, if created sensitively, they also have the potential to provide new public and civic spaces for the city. London's streets are a key mixing place for everyone, and when not dominated by cars, could also serve as a real asset to the city, providing health and social benefits.

Page:	Policy D2 Delivering good design
Section:	3.2.2

Support - We strongly welcome the recognition that an understanding of the existing character and context of areas should be key to the development of masterplans and development. It is fundamental to the design of public space and sustainable neighbourhoods, and is the first key recommendation of Publica's *Vital Neighbourhoods* study on housing renewal, to be launched in May 2018. We found that it is crucial to undertake a site survey and engage local stakeholders to develop a detailed understanding of local conditions, assets and challenges before even considering undertaking housing renewal. Our findings show that it is not enough to view housing solely as a physical asset; instead, housing must be considered in relation to those people who live in it, i.e. their existing communities, and the particular ways in which they make use of and inhabit it.

Page:	Policy D4 Housing quality and standards
Section:	3.4.8

We welcome the support for tenure integration, and particularly the tenure-blind approach to design, which might support more cohesive neighbourhoods.

While, tenure integration should be maximised within individual development, its distribution should also be carefully considered across the whole city. This will ensure that a range of housing tenure developments are included in all neighbourhoods across the city to avoid marginalisation of, for example, social housing/affordable housing developments.

Page:	Policy D4 Housing quality and standards
Section:	3.4.9

We agree with the Mayor's concern over the social impact of gated developments, and support the promotion of the principles of good urban design in the creation of new places, particularly new streets.

Page:	Policy D6 Optimising housing density
Section:	3.6.3

The prioritisation of new residential and commercial development in areas which are accessible by walking, cycling, and public transport is welcome, and can enable Londoners to use active travel to access the area. We also support keeping car parking to a minimum, particularly in areas where public transport is readily available.

However it is important that this is practiced with care, in order to ensure that areas around transport hubs are able to retain character and liveability, rather than being dominated by hyperdense development which overshadows and is disconnected from its surroundings in form, scale and use.

Page:	Policy D6 Optimising housing density
Section:	3.6.6

We strongly support the use of masterplans and strategic frameworks. The development of a principle-led masterplan or brief which is widely shared from the outset is of critical importance to creating sustainable places and neighbourhoods.

Page:	Policy D7 Public realm
Section:	3.7.1

We support the recognition of the importance of streets to London's public realm. We also welcome the use of the Healthy Streets approach; as eighty per cent of London's public spaces are streets, they represent crucial sites to improve public health.

We also welcome the expansion to a more holistic sense of the public realm, for which design standards and expectations should be as high as any other new public space or street. We would also support further articulation of how the Mayor's aspirations for improving the public realm will be implemented throughout the structures of the GLA, to make London an international leader.

Page:	Policy D7 Public realm
Section:	3.7.2

We welcome the Mayor's acknowledgment of the public realm's impact on quality of life, and the commitment to improving the quality of public realm and its and relationship to the built environment. We support the growth of new and more intense uses, and highlight the importance of ensuring a true diversity of uses, throughout the day and night, that is representative of Londoners.

Page:	Policy D7 Public realm
Section:	3.7.3

We strongly support this approach which recognises streets as public space, particularly in cases of increased densification.

Page:	Policy D7 Public realm
Section:	3.7.7

Alongside physical signage and wayfinding, intuitive wayfinding can be enabled within the city, through maintaining clear sightlines between popular destinations and orientation points, and ensuring key buildings and spaces are clearly visible from their approaches. Intuitive wayfinding also particularly benefits visitors to London.

Page:	Policy D7 Public realm
Section:	3.7.8

We support this more holistic approach to the public realm which goes beyond site boundaries, to consider the relationship between development and adjacent spaces. Good public space is a real asset but relatively fragile - without proper consideration the elements that make it a success can easily be lost.

Page:	Policy D7 Public realm
Section:	3.7.9

Publica welcomes the commitment to the development and publishing of a Public London Charter. We recognise that the question of London's public space, in terms of its scope, and relationship to the public and private sector, the good growth agenda, and investment in our civic identity and amenity for all, is an important conversation. This discussion should also consider how we use the 80 per cent of our public realm that is made up of streets or roads, how we optimise new infrastructural investment, and how we celebrate and access the rivers. We look forward to engaging in this work through Lucy Musgrave's MDA position on the steering group.

Page:	Policy D7 Public realm
Section:	3.7.10

We welcome the consideration of lighting as a key aspect of the public realm, and the need to balance safety with aesthetics and light pollution. We would also support further measures to protect and enhance the unique character of areas at night. Places with unique characters during the day can feel homogenous at night without consideration of their lit character.

Lighting can be used to affirm the importance of an area, such as part of the CAZ The sensitive use of lighting can also help ensure the recognition of specific identities of cultural quarters, both within and outside the CAZ. Covent Garden, where under Westminster City Council's Theatreland policies, 'Showtime' lighting provides additional lighting for an hour before the start of evening shows, is a great example of the use of lighting to create atmosphere. It also reinforces the centrality of theatre and performance to the identity of the area; this theme importantly spans throughout the day, with buskers and street performers during the day time giving way to plays, ballets, concerts, and operas in the surrounding venues at night. Drama is effectively created through this intensification of lighting, but its temporary nature is also appropriate to the area's residential use and the historic, gas-lit character of the streetscape.

The lit character of London's neighbourhoods should also reflect their identity during the day, to ensure that visitors are able to continue to experience the character of an area throughout the evening and night time. Brightly lit neon signs at night, for example, reflect Soho's character as a centre for cabaret and the creative industries, with hints at its seedier past.

Page:	Policy D7 Public realm
Section:	3.7.11

We strongly support the provision of free drinking water, and suggest that it should be integral to all new substantial public spaces. Good examples can be found in other countries - Australian cities are advanced in this process.

Page:	Policy D7 Public realm
Section:	3.7.12

We support the use of temporary and meanwhile uses where development is underway, and highlighted in *A Future for the Oxford Street District* (2017) that this can play an important role in animating the public realm. We suggest that these uses should be designed and delivered in clear relation to what the local area needs, and in consultation with local residents and businesses.

As well as showcasing smaller businesses in a relatively affordable way, pop-ups and meanwhile uses can also be a way of introducing activity at different times of day, without the risks of introducing a new use class permanently. This could be a useful tool in sustainably moving towards a 24-hour city.

Page:	Policy D12 Agent of Change
Section:	3.12.2

We strongly support the use of the Agent of Change principle as a tool to ensure that the rich cultural and creative life for which London is so unique and well-known can be sustained in the future. London's role as a cultural and creative city is vital to its future success.

Page:	Policy H1 Increasing housing supply
Section:	4.1.1

We welcome the Mayor's commitment to tackling the housing crisis in London. Although we support increasing the numbers of homes available to all Londoners, we would highlight the importance of ensuring that the right types of homes are being delivered that respond to the housing need of the local area. We also emphasise that the urgency of the need should not be an excuse for poor design and build quality, and that every effort should be made to ensure that new developments provide sustainable neighbourhoods, offering useful amenity and enabling a broad mix of Londoners to live together.

Page:	Policy H2 Small sites
Section:	4.2.1

We support the increased role for small sites which might be seen as an opportunity for innovation, particularly for smaller architectural practices and property developers; building on the success of the London Borough of Croydon's Brick by Brick programme. Smaller sites can also contribute positively to a fine-grained streetscape, as well as much-needed housing and civic amenity.

Page:	Policy H2 Small sites
Section:	4.2.10

We welcome the support for community-led, small projects to help meet housing need. As part of our work on *Vital Neighbourhoods*, we investigated Kalkbreite housing cooperative in Zurich, and found that the use of community-led design, a cooperative ownership model, and a purposively selected mix of tenants contribute to its success as a development.

Page:	Policy H5 Delivering affordable housing
Section:	4.5.5

Publica supports the Mayor's commitment to the provision of genuinely affordable homes, and understands that a broad mix of tenures is important to ensure that London can continue to be home to a diverse mix of people, and remain a vibrant city, with active and well-used streets.

We welcome the commitment to integrating affordable housing into new developments, as this can avoid spatial stratification of the city according to income.

Support -

Publica has recently published a study on international best practice in housing renewal, *Vital Neighbourhoods: Lessons from International Housing Renewal*, in collaboration with Stanhope.

It is our hope that the recommendations in *Vital Neighbourhoods* can contribute meaningfully to delivering housing renewal in the UK. The findings from this research – based on evidence collected between summer 2016 and early 2017 – highlight examples of how renovation and redevelopment of existing housing stock has, when undertaken with a real commitment to ensuring the wellbeing of existing residents, design integrity, and high quality construction, provided quality homes quickly and efficiently, and helped to build community cohesion.

The report proposes a set of seven key recommendations for those considering or commencing housing renewal projects. Of particular importance are the first three key recommendations, which propose: the first task of any such project should be to develop a clear understanding of the site, its community and networks as well as its physical and spatial conditions; efforts to identify and meet the needs of existing residents should be undertaken before any new homes and residents are introduced; and existing residents should be engaged in the project processes as early as possible to help develop a sense of ownership and involvement.

Page:	Policy S1 Developing London's social infrastructure
Section:	S1

We welcome the Mayor's recognition of the value of social infrastructure in new developments, which was one of the key findings of our *Vital Neighbourhoods* study of housing renewal.

Social infrastructure should also be aimed at existing communities, and integrating new residents into existing communities. Plans should be developed in collaboration with residents, based on a review of their needs and existing social infrastructure. Phasing should consider the importance of social infrastructure to communities, and not leave neighbourhoods without social infrastructure. Neighbourhood plans are an excellent way to understand which facilities are valued as assets and work with resident priorities.

Page:	Policy S1 Developing London's social infrastructure
Section:	5.1.8

We support the location of social infrastructure facilities where they can be accessed by public transport, walking, or cycling. Social infrastructure should be part of a dense, liveable townscape that encourages people to travel to work and leisure without the use of cars.

We welcome the co-location of different services in the same facilities where appropriate. The success of social infrastructure will depend on the extent to which it is designed and delivered through long-term planning. Resilient social infrastructure would have the capacity and flexibility to accommodate several uses, and to inclusively adapt to the changing demands of the local community. It should extend the active hours of the day for the building; an example of this might be a facility which could offer crèche services during the morning, a lecture and refreshments for older people in the afternoon, and a film screening for teenagers in the evening.

Page:	Policy S4 Play and informal recreation
Section:	S4

Publica welcomes the recognition of the importance of play, accessibility, and independent mobility for children and young people. We suggest that, as with cycling infrastructure, public realm schemes should adopt an eight to eighty approach, which seeks to ensure that the public realm can be used independently by people aged eight to eighty, and in the case of play even younger.

High quality play spaces help to ensure that London remains a city that is accessible and liveable for families.

A wide range of play spaces are needed, which provide for children and young people of all ages - from incidental play to organised spaces. In areas of major simultaneous development schemes should be coordinated to provide larger and better quality play spaces, rather than many small and similar places. This is particularly important for teenagers - spaces for teenagers are typically harder to accommodate in high-density development because of noise and space considerations. Innovation in play space is required in high density schemes.

Page:	Policy S6 Public toilets
Section:	S6

Publica supports the provision of free publicly-accessible toilets as a key tool in making the public realm accessible to all.

Page: Policy HC5 Supporting London's culture and creative industries
Section: HC5

Publica welcomes the commitment to use the planning system to protect existing venues, cultural facilities and services, as integral parts of London's cultural infrastructure.

Publica also supports the provision of new cultural and creative venues, however our work has highlighted that the introduction of these should be considered in tandem with creative workspaces and studios, which are vital to the continued success of London's cultural sector. Artists, designers, musicians, and performers are key to the maintenance of a diverse and exciting cultural city, and ensuring that their workspace is protected, and providing new workspaces that are affordable, will also be crucial to ensuring that talented people in the creative industries remain in London, where they contribute so much to London's identity and economy.

Page: Policy HC5 Supporting London's culture and creative industries
Section: 7.5.6

We would support measures that could extend the day in cultural buildings, particularly if this would enable them to be used for reduced rent, or if access was targeted at particular groups who struggle to be represented elsewhere. We agree that they can help to stimulate vitality in the street, and would add that open businesses can also confer a sense of safety to the public realm at night.

Page: Policy HC5 Supporting London's culture and creative industries

Section: 7.5.8

By identifying Strategic Cultural Areas and Cultural Quarters, development of cultural activities can be focused and proactive. Prioritising these areas in the planning system can ensure that they are not threatened by competing interests. The designation and development of new Cultural Quarters is also supported where it can extend the hours of designated town centres, where night time activity is least likely to result in disturbances for local residents. New Cultural Quarters should reflect and enhance the existing character of the area, with daytime and night time uses complementing one another. For example, Publica has identified that an increase in Oxford Street's cultural and night time offer might complement that of neighbouring areas such as Soho and Covent Garden, potentially relieving some of the pressures on the West End Stress Area.

The unique character of each cultural quarter or cluster should be recognised and promoted. Extensive research and analysis is key to understanding the character of an area. Publica developed the City of London Cultural Hub Vision to acknowledge and enhance the unique identity of the Barbican and Golden Lane Area, and the central role that cultural uses play in defining the area's character.

Page: Policy HC5 Supporting London's culture and creative industries

Section: 7.5.10

We welcome the inclusion of Cultural Quarters as part of the planning for Opportunity Areas, Areas for Regeneration and other large areas for development, although we suggest that the existing character and needs of current residents should be a consideration when undertaking regeneration, as noted above. It is also important to see the creation of new cultural quarters as an opportunity to support smaller, local artists and organisations, rather than relying on outposts of large institutions. London is home to many established grassroots arts organisations, and these should been seen as equally important in the anchoring of new, large developments.

Page:	Policy HC5 Supporting London's culture and creative industries
Section:	7.5.12

A positive example of community led cultural facilities is The Albert, a 'meanwhile' arts space, developed as part of the renewal programme on the South Kilburn estate, which hosted community and cultural events for a year from September 2012, involving over 60 creative collaborations. The Bussey Building in Peckham is another case study for successful integration into neighbourhood and used by local communities as well as creative industries. It includes spaces for cultural consumption alongside those for cultural production, in addition to important neighbourhood amenity.

Page:	Policy HC6 Supporting the night-time economy
Section:	7.6.1

In many ways, the night time economy can be seen as a broad term, embracing not only entertainment and leisure, as implied by the term "nightlife", but other employment types that work at night, however it tends to focus exclusively on the transactional. It would be a very partial picture if London during the day were described by its economic activities alone, omitting its streets, monuments, and atmosphere. We believe that in fact, the focus of the Night Time Commission should be on the experience of London at night, encompassing a much broader scope, that considers all activity from 6pm to 6am, with consideration of how this interacts with the evening and early morning. This focus should include consideration of the intangible and experiential aspects of London, and can also be an opportunity for London to think carefully about its night time identity.

Page:	Policy HC6 Supporting the night-time economy
Section:	7.6.9

Publica finds the focus on inclusive and non-alcohol-based night life a positive step, and we welcome the effort to widen the offer available to Londoners and encourage a broader mix of uses.

Page:	Policy HC6 Supporting the night-time economy
Section:	7.6.10

Publica supports the Mayor's consideration of the public realm at night - this is a key issue affecting many people's enjoyment of the night time and should be a priority element of the move towards a 24-hour city. Whether people are using the public realm itself, or moving through it for work or leisure, it should be safe, accessible, and reflect the daytime character of the area.

A key barrier to London's night time public realm is safety, or the perception of safety.
Lengthening the animated hours of an area through the encouragement and introduction of new activities can increase safety through passive observation; by inviting people to dwell in the area later in the evening, those travelling through can be confident that there are 'eyes on the street' at night.

Active, lit frontages can contribute to a sense of improved safety and surveillance, but a public realm that continues to hold activity can best improve comfort and safety, as well as encouraging the use of active travel over taxis, private hire or public transport. Publica's work on Oxford Street has shown how critical this latter surveillance is in areas dominated by retail uses; currently, there are only two units open late at night between Marble Arch and Oxford Circus, which can give rise to a feeling of emptiness, darkness and insecurity. Animating the public realm and introducing evening and late night activities is an important strategy for the Oxford Street district, and could provide useful lessons for other cultural quarters and retail destinations.

Page:	Policy HC6 Supporting the night-time economy
Section:	7.6.11

We strongly support the growth of a wider range of activities taking place at night, although note that due to London's diverse mix of uses, there is a need to balance servicing and freight needs with other night time activities, such as bars and clubs. This is evident on Oxford Street, where the proposed pedestrianisation will create a new public realm, but may create difficulties for servicing shops and ensuring they are able to make deliveries as frequently as their customers require. This will require a joined up approach across a number of stakeholders, led by boroughs and the GLA, to avoid conflicts between different uses.

Page:	Policy G1 Green infrastructure
Section:	8.1.1

Publica welcomes the commitment to improving London's network of green spaces, street trees, green roofs and other major assets towards a green infrastructure approach. We would go further, and suggest that an extensive green infrastructure network could be the next great civil engineering project for London, making the city a global leader, and contributing to the Mayor's aspiration for the creation of a National Park City.

Publica is currently engaged in an initial study for the development of a cultural strategy for the River Thames, and we strongly support the development of links between London's green and open spaces, and the city's waterways, themselves open spaces.

Page:	Policy G4 Local green and open space
Section:	8.4.4

Publica supports the proposals to enhance green and open spaces to provide benefits for Londoners, and we suggest that improvements should enhance the adaptability of spaces to varied uses and occupants, as well as incorporating green and blue infrastructure. This should be done by first examining how the space is currently used, and how it could better meet the needs of a variety of users.

Page:	Policy T1 Strategic approach to transport
Section:	T1

Publica supports the Mayor's vision to enable Londoners to make alternative transport choices to car travel by creating places where people are prioritised over vehicles and active travel choices are accessible and appealing. Public transport and active travel are expected to become increasingly important as cities densify, and seek to reduce their carbon impact. It is therefore important that public transport and active travel infrastructure is not just built to respond to current problems, but pre-empts and adapts to meet future challenges.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.1

Publica strongly supports the integration of land use and transport and the creation of clear, well-defined networks of routes that will enable travelling by bicycle to be seen as a viable journey option.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.3

Publica strongly supports efforts to better manage the way goods are delivered in London. Consolidation centres, micro-distribution centres, low and zero emission vehicles, and bicycles and cargo-bikes are all essential components in tackling the challenge of making freight more efficient. Collaboration with workplaces, retailers, developers, and BIDs will be crucial to this project, which is expected to become increasingly important as people come to expect ever greater speed and convenience from online retail.

Page:	Policy T1 Strategic approach to transport
Section:	10.1.4

Publica strongly supports the adaptation of the existing road space to the benefit of more efficient modes of transport. An example of how this can be done is through the allocation of existing carriageway space to segregated cycle lanes. This has been done to great effect on Blackfriars Bridge where the latest TfL data shows that the cycle lanes are 5 times more efficient at moving people than the standard traffic lane (TfL, 2018).

Page:	Policy T2 Healthy streets
Section:	T2

We support the integration of walking and cycling networks into new developments, in line with the Healthy Streets approach, and agree that these should be planned at the earliest stages. We would also welcome further detail on quantifiable targets for reducing car use, designation of areas for car-free development and more detailed enforceable standards for the creation of walking and cycling networks.

We support the delivery of further cycle routes, however all proposed routes must form part of a network of active travel routes throughout London. The Dutch Design Manual for Bicycle Traffic defines five key elements in creating a network: cohesion, directness, safety, comfort and attractiveness. These same factors are reflected in the London Cycling Design Standards and should form the basis for any works. There is, however, the need for consistency in their application across schemes and a joined up holistic strategy should guide delivery of schemes across London.

The adoption of an 'eight to 80' model of suitability would be beneficial in delivering a consistent standard of interventions across London. This would mean that all schemes provide an inclusive walking and cycling environment that is suitable to all users between the ages of eight and 80 years old.

Networks should be created that take in key routes to schools and areas designated as town centres, so that the concepts of walking or travelling by bicycle are instilled as viable transport options from an early age and active travel is built into the everyday routine.

The point at which to introduce different levels of public realm intervention would also benefit from a standardised approach. A matrix, that correlates place function and traffic volume could be developed in this regard based around one recommendation frequently made by the London Cycling Campaign (LCC), amongst others, and used in Holland, the adoption of the 2000pcu tipping point at which bicycle and motor vehicle traffic become segregated by time or space.

Publica welcomes the reallocation of space from uses such as on-street parking to cycle parking. We suggest that this could be strengthened by a mechanism through which local authorities can simply and efficiently reallocate on-street space from low volume (motor vehicle) to high volume (cycle) parking and a target quota based on TfL's data for journey potential.

Page:	Policy T5 Cycling
Section:	10.5.5

We strongly support improved provision of parking for disabled cyclists. It is crucial that parking provision take into account the special access and parking requirements of nonstandard bicycles such as cargo bikes, tricycles and handcycles in order to remove barriers to participation in active travel.