



Planning

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Dear *Mayor*

New London Plan – draft for public consultation

Thank you for providing us the opportunity to comment on your draft New London Plan, published for public consultation on 1 December 2017.

We have worked closely with your Deputy Mayor for Planning, Regeneration and Skills, the wider Mayoral team and colleagues at the GLA to develop the Plan. This has sought to emphasise the important role of efficient, active and sustainable transport in supporting all six of the Plan's overarching objectives. Overall, we welcome the ambition of the Plan, and the policies it contains. Alongside your Transport Strategy, these policies will ensure that growth is delivered with sustainable transport outcomes, helping meet the target of an 80% overall sustainable transport mode share by 2041.

Given the scale of London's forecast growth over the next twenty years, we support the Plan in putting transport and land use integration at its heart. We support the requirements for all new development to make the most effective use of land, encouraging space-efficient, active travel and promoting new development in accessible and well connected areas of London such as around stations and town centres. This approach is central to increasing densities in a sustainable way across the capital. In this respect, we also support the clear linkage that the draft Plan makes between higher levels of connectivity, higher development densities, and lower levels of car parking provision.

Much of London's future growth will be concentrated in Opportunity Areas, many of which will depend on significant transport investment, such as the Bakerloo line extension, Crossrail 2 and other rail upgrades and extensions.

The draft Plan contains policies which are supportive of such interventions, including in relation to the protection of land for transport infrastructure, stressing the need for funding from development and highlighting the importance of the timely delivery of growth in line with transport improvements. Beyond the Opportunity Areas, a significant amount of growth will occur in suburban outer London, where a number of interventions on the transport network will be needed, including buses and walking and cycling infrastructure, to ensure that growth does not depend on the car.

Essential for the delivery of such growth will be embedding the Healthy Streets Approach in new developments and planning frameworks, helping facilitate shorter, regular trips by walking and cycling. We very much welcome the draft Plan establishing clear requirements for developers and local authorities to embed the Healthy Streets Approach at a strategic, network and street level, with this holistic approach being vital to reducing congestion and emissions, improving air quality and tackling the inactivity crisis. The approach set out in the Plan puts people and their health at the centre of our decision making, helping everyone to walk, cycle and use public transport more, and to use cars less. Improving how we plan for freight and servicing in new development is also central to achieving the vision for Healthy Streets, and the draft policies supporting a more efficient freight network are therefore vital.

We have worked closely with the GLA to develop the new standards for cycle and car parking that are contained in the draft Plan. The approach to cycle parking caters for areas of London where greater provision is needed to cater for forecast and potential growth in cycling at certain land-uses. This will ensure that the infrastructure required to support expected future demand for cycling in new development is delivered at the outset, having regard to your ambitions to increase levels of cycling. Restricting car parking in new development is also vital to achieving the aims of your Transport Strategy, with car parking policy playing a fundamental role in shaping the type of growth that happens in London as well as the travel patterns of residents and users. We recognise that the approach is - necessarily - ambitious, but the policies and associated standards contained in the Plan are spatially specific, having regard to the availability of alternatives in different parts of London, and will be vital in helping to reduce the dominance of vehicles on our streets and support higher density development in sustainable locations.

The draft Plan identifies the need for significant investment to deliver the infrastructure necessary to support growth. Beyond the important role played by existing mechanisms such as the Community Infrastructure Levy, we continue to work closely with the GLA and central government in considering the role that greater fiscal devolution to London could play in reducing the transport infrastructure funding gap, in line with the recommendations of the London Finance Commission.

The draft Plan also accords priority being given to public transport alongside affordable housing in the negotiation of planning obligations, and this is strongly supported, and must be maintained if we are to be able to support good growth.

The draft London Plan sets an ambitious and exciting spatial strategy for growth, and contains policies which are vital to enable the delivery of your Transport Strategy. We look forward to continuing to work closely with you and your team at City Hall in supporting the London Plan over the course of its development, examination and through to adoption.

Yours sincerely



Mike Brown MVO