



GLA  
CITY HALL  
LONDON

2 March 2018

Dear Sir/Madam,

### **Draft London Plan – WSP RESPONSE**

This representation is made by WSP. WSP is one of the world's leading engineering professional services consulting firms. We are technical experts and strategic advisors including engineers, technicians, scientists, architects, planners, surveyors and environmental specialists, as well as other design, programme and construction management professionals. With 40,000 talented people in more than 500 offices across 40 countries, we engineer projects that will help societies grow for lifetimes to come. We have a significant coverage of a wide range of public and private sector projects across London.

WSP stands ready to support the Mayor in bringing forward the new policies as set out in the Draft London Plan. We welcome the broad direction of travel as highlighted in the Draft which sets out the strategy to 2041 and should be commended. In particular we welcome the strengthening of the relationship between transport infrastructure, funding and growth. This relationship is essential if London's future growth aspirations are to be realised. We fully appreciate that this is a marathon not a sprint!

### **General**

We note that the Draft is over 500 pages which appears to be very long for a strategic document. As a result in our comments we have kept in mind that the Plan must be a strategic document, and have identified some areas where it could be shortened.

We note the intention to update and produce a number of new SPG's to assist in implementing the policies. However we would strongly suggest a sharper focus on delivery in the Plan, as whilst it is useful to have clear policies, it is often the lack of available delivery mechanisms which undermines the pace of implementation.

We also note that much of the transport content and transport policies in the Draft are evidenced in the draft Mayors Transport Strategy, which we understand from TfL will be adopted in March 18. WSP provided representations in respect of the draft MTS which reflect some of our responses to this Draft. We also note the various evidence bases that are included in support of the plan (e.g. car parking, cycle parking and strategic assessment). We generally welcome the closer alignment between the MTS and London Plan, however it is unclear how much weight the MTS will have in determination of planning applications and preparation of Policy documents? As in the past in has barely been mentioned in the statutory planning process? The plan could be made shorter by greater cross-reference with the MTS.

Overall the Draft would benefit from some guidance on how policies should be balanced in different circumstances, as well as some clarity around the measurements and methodology, including a clearer set of targets.

As is often the case with strategic policy, the effectiveness is in how they are interpreted. If you take car parking as an example, what is acceptable to one borough is not acceptable to another. The plan should go further to address this and should provide the clear rationale for doing so.

### **Good Growth**

Good Growth forms the backbone of the Draft, which is set against application of 6 key Good Growth policies. The principle aims of these policies cannot be faulted, however there appears to be a lot of duplication and repetition with the core policy areas. Perhaps by consolidating them into a single list of priorities the Draft could be shortened considerably?

The challenge of delivering Good Growth is in defining what it means to different people in different places. The strategic definition of Good Growth does not articulate easily to the local level.

GG2 in particular is supported as this sets the context for integration of higher density development in areas well connected by transport and in Opportunity Areas, as these are of strategic importance in delivering London's housing and jobs. It also seeks to bring together public and private sector land. More should be done to ensure these sites come forward with greater emphasis on public/ private sector partnership. We would recommend specific guidance in this area.

### **SD1 Opportunity Areas**

The Draft sets a different geographic context for growth in homes and jobs than the adopted plan. There is a shift away from sub-regional planning towards a corridor based approach which strengthens the relationship between transport infrastructure and growth. There is a strong emphasis in the plan on the Elizabeth Line, Thameslink, Bakerloo Line Extension, Tram Extension and importantly Crossrail 2. The Draft goes on to say that bus and cycle routes will also be used to stimulate growth. This strategy would benefit from a clearer picture on how these transport projects will be funded and the specific mechanisms that are required to unlock them. Without this boroughs find it difficult to plan for growth at the local level. For example, we would recommend that the affordable housing targets are relaxed in favour of infrastructure provision if this unlocks significant housing and jobs growth. Another option could be to provide clearer objectives around how London will find the funding, and how this will be split across different infrastructure projects. We note the role of the National Infrastructure Commission in reviewing UK infrastructure.

The target numbers are now embedded in the corridor/ project specific text in the policies. This seems to suggest that homes and jobs in these areas are only delivered with the infrastructure. What would be really useful to see moving forward is a broad split between growth which can happen in advance of the transport infrastructure set against the 'uplift' which is enabled by the projects. We also feel it would be useful to retain the table illustrating all of the opportunity areas and the growth targets (possibly by including these indicative 'uplifts').

### **D6 Optimising density**

This policy shifts the focus from intensification to optimisation, which was the term used in earlier versions of the London Plan. It seeks to use design factors to determine the criteria for optimisation, by replacing the density matrix. Part A states that development that does not optimise development will be refused. Whilst there are some weaknesses with the density matrix it at least provides a guide as to what is broadly acceptable. If it was to be reinstated we would suggest that it is supplemented by form of design coding which identified how higher densities could be acceptable and in what locations. Or indeed where the case for regeneration outweighed the harm to other policies.

Part A and B seek to make the link between density and future transport proposals. However we feel that without a clear level of commitment to funding these projects, or indeed more specific methodologies around

how development can be phased, this policy will be difficult to implement, as it requires application of a complex set of land use and land value assumptions. More certainty in this area is required, particularly in outer London where accessibility levels are more sensitive to changes (for example through supplementary guidance on bringing forward development which is dependent on transport infrastructure).

We would suggest that the plan includes more specific guidance and coding and a methodology to which boroughs and developers can work to. Within this guidance there should be an acceptance that densities must be higher in highly accessible areas close to transport links (or where a minimum density could be applied). Optimisation should connect to the policies on transport and housing by setting the context for the housing typologies and form of transport improvements. This could then connect to the policies on obligations, for example the methodologies on the proportion of investment necessary for transport and affordable housing.

### **Policy T1**

We welcome policy T1 which states that development proposals should support the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. We also support policy text which states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and to ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

We note that the mode share assumptions are broken down further in the draft Mayor's Transport Strategy by central, inner and outer London with the target decreasing slightly as you get further out. Whilst the objective should be placed on achieving this on a London wide level, we would ask how it is to be measured on a borough by borough or site by site level? Could more specific strategic targets be used? There is an emphasis here on developers, boroughs and TfL working much more closely to target design and investment strategies at a corridor or junction level.

### **T2 Healthy Streets**

We welcome the overall ambition in the plan to promote Healthy Streets. The approach is still relatively new and in development phase in terms of how it is to be assessed and implemented. An evaluation criteria for different scales of development or types of network would be welcomed, for example we understand TfL has appraised its own projects against Healthy Streets approach and it would be useful to share this learning with TfL. We note that TfL has published high level guidance on the approach to assessing Healthy Streets and this is to be developed further as part of an update to the TfL TA best practice guidance.

### **T3 Transport capacity, connectivity and safeguarding**

Part D of policy T3 states that in Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line. This is welcomed however we also believe that the policy should go further by providing a clear timescale for delivery and a clearer relationship between the number of homes and jobs which are linked to these schemes, and what is needed to deliver and fund them (please refer to our earlier comments on Growth Corridors and Opportunity Areas). This would provide greater certainty at the local plan and OA level. The Plan should also identify other rail network and station capacity and access improvements which could relieve congestion and unlock growth. There should be a greater emphasis in the plan on working in partnership with Network Rail, which is a critical stakeholder in bridging London's relationship with the wider Southeast and could apply equally to Policy SD2.

Part E discusses supporting capacity and connectivity and supporting and giving priority to buses. Again we understand the need to safeguard the bus network. However there is concern that the way TfL appraises the impact of development and the lack of flexibility which exists in the network, along with a lack of transparency about the cost of operating the network often undermines this policy. In addition we would like to see clearer plans for how TfL intends to invest in the bus network and how public and private sector can share the costs.

We note the reference to Demand Responsive Bus Services in the draft MTS and welcome further discussions on this.

We support the delivery of Crossrail 2 as this will help provide capacity relief on the network from the early 2030's. It will also stimulate growth in homes and jobs in a large part of London. We note that the government is reviewing the infrastructure needs for the UK and this involves appraisal of the Crossrail 2 project to ensure it gives value for money. Given the importance of the project it would be beneficial to include targets for funding, delivery and development 'uplift' to assist developers and boroughs in developing their plans, including a practical methodology on how development could be phased where there is uncertainty over investment in public transport (see also T4).

#### **T4 Assessing and mitigating transport impacts**

The constitution of this policy remains broadly as is set out in the adopted London Plan. Part A discusses the phasing of development to integrate with current and planned transport infrastructure. Part D then goes on to say that planning permission may be contingent upon provision of public transport improvements or active travel infrastructure (e.g. use of Grampian conditions). As highlighted in earlier comments in respect of Policy D6, without a clear level of commitment to funding these projects, or indeed more specific methodologies around how development can be phased, as this requires application of a complex set of land use and land value assumptions.

We will be discussing further elements of the assessment criteria and TA Best practice guidance directly with TfL to ensure that there is clear guidance on how the key parts of this policy are to be implemented. In particular we note the different travel patterns and use of Apps' to plan journeys.

These mobile and 'Open Data' sources should become more widely used in assessing the impact of development and managing future impacts on the network. The Draft lack a real emphasis on a rapidly changing environment.

#### **T5 Cycling**

We welcome the strategy to encourage more cycling across London as this will contribute hugely to the health and wellbeing of London and will reduce congestion. Table 10.2 illustrates areas with higher parking standards, but the Draft does not illustrate clearly what those higher standards are? Can this be clarified?

We have previously questioned why parking standards are calculated using GEA and not NIA. The use of GEA tends to generate an artificial requirement as much of the space within the buildings is not useable office space. We would request that this is investigated further to avoid more onerous standards being set?

We have some concerns about the cycle parking standards being sought, particularly for major office development in central London. In some cases basement excavation can be constrained by underground conditions and utilities, with the cost of excavation often being prohibitive making schemes unviable. We request that the plan recognises that in these exceptional circumstances there may be a case to relax the cycle parking standards.

In addition the cycle parking standards for student accommodation seem to be particularly onerous. Our experiences of monitoring of cycling use by student shows that there is not the level of demand to reflect the standards. Equally in some locations it is unviable to excavate expensive basements to provide cycle parking, or to use ground or upper floors to provide the necessary cycle parking.

There is an assumption in the Draft that in circumstances where cycle parking cannot be provided on site, that developers should liaise with local authorities in respect of public space and highway. Whilst this may be possible in some cases it would be onerous to expect some developers to enter into such agreements to provide or maintain cycle parking. Equally it is unlikely that owners would wish to leave their personal bicycles in public areas.

It is our opinion, which is demonstrated in the take up of use that foldable bicycles can provide a more deliverable and cost effective answer to these land use challenges. Therefore we would strongly advocate the contribution of foldable bicycles as a means to achieving mode shift targets and we would like to request that an amendment is made to the policy which recognises that foldable bikes can make a significant contribution towards achieving the cycle parking standard.

Furthermore we would expect the popularity of dockless bikes to increase in the coming years, particularly in areas where TfL's own cycle hire scheme is not in operation. The plan must take account of these kinds of changes in use and changing travel habits. We appreciate more work is required on regulation and management, but the policy and research should refer to these changes.

Overall the method of assessment, for example use of TRICS and other data is not representative of cycle use. Whilst cycle demand is rising there is not necessarily a close enough relationship between the amount of cycle parking requested and the level or types of demand. Often the standards lead to a scenario where there is an expectation that 40-50% of trips will be made by cycle, but the conventional methods of assessment using TRICS only demonstrate 2-5%, resulting in substantial adjustments being required. We hope to see TfL bring forward some changes to help address this.

## **T6 Parking**

The general approach to reducing parking, particularly in high PTAL areas, Opportunity Areas and town centres is generally welcomed. As this will ultimately lead to improvements in air quality and the health and wellbeing of London. The aspiration to achieve the 80% mode split for non car modes will only be achieved by greater investment in public transport services, particularly local services in outer London.

Part A states that parking should be restricted in line with existing and planned transport infrastructure. Part B goes on to state that car free development should be the starting point for these locations. We reiterate our earlier comments about more certainty on funding and timing certainty of planned infrastructure and how this effects land use and land valuation (more guidance and methodology of assessment is necessary).

Part I states that any development which is reprovided should be reprovided in accordance with the parking standards and not the existing use. We can see some problems arising in this approach for some land uses, and the same issues arise if they are in locations to be served by planned (but uncommitted transport improvements). This would represent a substantial reduction for food superstores for example, which would fundamentally change their

We note that car club and motorcycle parking spaces should be incorporated into the overall car parking provision and ratio. In general we would like to see more work done on car sharing and on future transport such as Mobility as a Service (MaaS), and Connected Autonomous Vehicles (CAV) and how these new forms of technology can be planned to cater for changing demands. We request reference is made to safeguarding land and investigating the benefit of these new demand response services in planning areas and sites.

As highlighted earlier, the difficulties with parking policy arise in the implementation at borough level, with different boroughs having different requirements. Developers would welcome more certainty and agreement between TfL, GLA and the borough at an early stage on the expected level of car parking. There should be an expectation in the Plan that this agreement can be reached.

### **T6.1 Residential parking**

We reiterate the comments made above.

Part B requests that parking spaces within communal car parking facilities should be leased and not sold. We would request some further research and guidance around implementation of this policy.

Part G states that residential development should provide a minimum of 3% of spaces should be for disabled persons, with up to 10% of spaces safeguarded for future demand should this arise. This does not seem



realistic as the level of parking will be set upon grant of permission and it will be difficult to provide further parking later. We would also argue that car free development should be genuinely car free, particularly where sites are fully accessible by DDA compliant public transport. We completely support the need to provide a level of disabled persons parking in new development. However our research shows that take up has historically fallen well below the required standards and just leads to spaces being provided and never used or used by non Blue Badge holders. We therefore suggest an amendment to the policy which states that the level of Blue Badge parking will be set based on a combination of factors including location, level of overall parking and evidence of demand.

### **T7 Freight and servicing**

We fully support the emphasis on freight and servicing in the Draft. We note the emphasis placed in the Draft MTS to seek to reduce traffic flows in the peak hours and consolidate and retime deliveries. It is noted that there are a complex range of issues to be resolved which go well beyond planning policy and relate to business operations, patterns of supply and demand and the responsibility of individuals. The Draft refers to TfL's useful suite of guidance on this matter. We do feel that as with much of the Draft there could be more appreciation of technology, innovation and smart consulting in solving some of these challenges.

### **T9 Funding transport infrastructure through planning**

We note the viability study which has been prepared alongside the Draft, and whilst we have not reviewed this in any great detail it does raise a number of questions and challenges which London must face if the level of growth is to be realised. The funding of major transport infrastructure such as those identified in Table 10.1 should be prioritised for delivery as this will assist in the pace and scale of delivery. As noted throughout our comments more certainty is required around the levels of funding available so that development can be shaped to reflect this.

We note that the Draft, as with the adopted Plan places equal weight to affordable housing and transport infrastructure. This is welcomed in principle but would benefit from further guidance on how and in what circumstances a prioritisation of one against the other will be made. At present the system means that there is often a lack of clarity and certainty until near the end of the process where funding should be prioritised with all parties seeking to secure the best outcome rather than working towards a clear set of objectives.

We note the Mayor will charge the Mayoral Community Infrastructure Levy (MCIL) to secure funding towards transport infrastructure of strategic importance such as Crossrail 2, and potentially other strategic transport infrastructure. We welcomes inclusion of Paragraph 10.9.3 which states that other transport infrastructure and improvements to public realm will be necessary to support London's growth. We would request that a reasonable balance is struck in seeking contributions where development contributes to such strategic benefits.

In conclusion we feel that some changes could be made to the overall emphasis of the Draft, and it could be made more punchy in terms of specific delivery and funding mechanisms. We also ask for greater flexibility where specific site constraints exist. Overall there is a lack of specific supplementary guidance which could really augment some of these policies and give clearer guidance to developers and councils.

We would be happy to discuss the contents of this letter with you further. Please get in touch with us at this office.

Yours sincerely WSP

T+ 44 (0)20 31169093

M+ 44 (0)7818 511634

WSP House, 70 Chancery Lane, London WC2A 1AF