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LCC response to City Hall consultation on London Plan

https://www.london.gov.uk/programmes-strategies/planning/london-plan/towards-new-london-plan-consultation

About LCC

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters, of whom more than 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

Introduction

The Mayor's 2017 London Plan made it clear that the strategic transport target was to increase the number of trips made by foot, cycle or public transport from 63% in 2017 to 80% by 2041. To quote the London Plan:

"An integrated strategic approach to transport is needed, with an ambitious aim to reduce Londoner's dependency on cars in favour of increased walking, cycling and public transport use. Without this shift away from car use… London cannot continue to grow sustainably."

The Plan further explained that this was essential to address congestion and to sustain "London's status as an efficient, well-functioning globally-competitive city." LCC shares this view and trusts that the Mayor and TfL will not waver in the determination to re-allocate road space to more efficient and healthier transport modes. We commend the Mayor on prioritising the future of the capital and its residents in the London Plan.

TfL will be keenly aware of the success of its cycling programmes in the face of a lacklustre national picture. As TfL has reported, cycling trips in London this century have risen from 300,000 per day to 1.33 million in 2023. This puts us on a trajectory to achieve a 10% modal share by 2041 (from a figure of circa 4.5% today).

All surveys of attitudes to cycling carried out in London and the UK this century indicate that at least 30% of the population wants to cycle or cycle more. In London a survey in 2021 found that "27% of Londoners already cycle and another 16% are actively considering taking up cycling (22% of non-cyclists)." A recent (2024) UK survey showed that 30% of people would be encouraged to cycle or cycle more by more cycle lanes.

These numbers are reinforced by the experience in cities which have high-grade cycle infrastructure (Amsterdam, Copenhagen and others) where, in similar weather conditions to London, a third or more of all trips are by cycle.

The barriers to cycling, or cycling more, cited by survey respondents are invariably the same: road danger and the absence of safe cycle routes and problems with cycle theft and storage. Where these barriers have been addressed in London, by protected Cycleways, Low Traffic Neighbourhoods, School Streets and secure cycle parking, cycling levels have increased markedly. In the borough of Hackney 15% of people cycle to work according to the national 2021 census; cycle and scooter counts at some schools in Low Traffic Neighbourhoods show a three-fold increase in active travel to those schools.

London survey data shows that almost half of households have access to a cycle. But at the same time a quarter of people say they don't have a secure place to store their cycle.

We emphasise that the Mayoral targets for active travel are for 2041 and beyond, and what we build now, whether it is Cycleways or safer junctions or cycle parking facilities at home and at work, must serve Londoners in decades to come and must be considered in the London Plan.

This response focuses on the aspects of the London Plan that relate to cycling; however we commend the representations made to TfL by other organisations supportive of active travel and the environment.

Local Planning Guidance

We note the publication of the Sustainable Transport, Walking and Cycling LPG in November 2022 that sought to progress the Mayor's transport targets by instructing boroughs to both identify safe cycling networks within their borders and to safeguard the land that would be needed to deliver such networks (a broad outline of the networks is provided in the TfL Strategic Cycling Analysis).

We are disappointed that most boroughs have not yet progressed this helpful and constructive guidance. The recent round of Local Implementation Plan allocations did not require presentation of a local cycle network despite the recent LPG and the Mayor's Transport Strategy effectively demanding delivery of such a network.

Key recommendation 1: The new London Plan must be explicit in requiring boroughs to comply with the LPG and satisfy TfL that they have designated, consulted and safeguarded a satisfactory strategic cycle network and local links on their highways.

Road pricing

The current Mayor has taken significant, and welcome, steps to reduce the volume of heavily polluting vehicles in London though the central and London-wide ULEZ requirements. Nonetheless he has ruled out 'smart' or 'pay per mile' road pricing, the most efficient and effective way to reduce unnecessary car journeys, for the period of the current mayoralty. Indeed, London's current congestion charge is under consultation to not only increase its charge but thereafter align increases in the charge to increases in public transport pricing – which shows how the current model needs reform.

We note that the last London Plan did include "Road pricing – next generation charging" as an indicative transport scheme. While such schemes may be politically unpopular there is little question that the existing congestion charge zone (CCZ) has paid off in stemming congestion and is now accepted by all political parties as an essential element of transport planning in London.

Key recommendation 2: The new London Plan must include road pricing as a priority transport scheme to secure the smooth, efficient and sustainable running of transport in the capital.

Freight safety standards

We note the last London Plan stated that planning applications should adhere to TfL's guidance on Construction Logistics and Delivery Plans and it makes specific reference to the Construction Logistics and Community Safety (CLOCS) standard stating that this should be utilised to plan for and monitor site conditions. LCC's research in 2024 found that a third of boroughs did not appear to be fully following this guidance.

Key recommendation 3: The new London Plan must require boroughs to write conditions into their planning and procurement policies to ensure that all developments in their area are following the specified guidance on freight/construction safety.

Cycle Parking Standards

While the Mayor's London Plan has a time scale of 25 years, buildings in London are, generally, built to last at least 50 years and there are many that are already 150 years old. Given that the Mayor's target is to boost cycling significantly by 2041 and beyond, it is important that a lack of secure cycle parking does not constrain the very welcome trend of cycling growth. As noted above, the number of daily cycle trips in London this century has grown from less than 300,000 per day to more than 1.33 million. If barriers

to cycling, such as road danger and fear of theft, and lack of secure storage, are removed there is good reason to assume that the number of cycle trips will double from current levels by 2041.

The lack of cycle storage in London is evident across London. Cycles are kept on balconies in flats, attached to lampposts and other street furniture, kept in insecure sheds and gardens. The number of cycle 'hangars' offering more secure storage has increased significantly but a survey by Clean Cities in 2023 estimated that there were more than 60,000 people on a waiting list for a hangar space even though these are chargeable, sometimes at higher rates than car parking spaces. Hundreds of such hangars are commonly installed all the way along older streets of apartment blocks in Amsterdam.

In the absence of secure cycle storage at home, in the workplace and at rail stations, cycle theft is rife in London with the police estimating that some 70,000 cycles are stolen each year. A survey cited by the Mayor's Walking and Cycling Commissioner indicates that following a cycle theft 14% of people stop cycling and 24% cycle less. This undermines the valuable work of reducing road danger and encouraging cycle use.

The last London Plan set out cycle parking standards in terms of spaces to be provided for new developments but did not specify either the quality of the parking (and experience shows that hard to access, dysfunctional bike racks are not well used), the amount of space to be allocated per bike, or the location of such parking.

The result is that developers may have met requirements in terms of the number of racks provided but in some cases used hard-to-use racks (for example those requiring lifting cycles to a significant height; or removing cycle mudguards to use a rack; or clashing with neighbouring bikes) or used hard-to-access locations such as: up a flight of stairs, through hard to open doors; in an unsafe basement; in very large unguarded compounds; or in locations that are a distant walk from the home or destination.

We note that one of the prime attractions of motoring is that most cars are usually parked in front of the front door or in the basement of the housing block or in a garage adjoining the home. To make cycling equally attractive we need to make cycle access as easy as car access.

Key recommendation 4: London Plan guidance must address the quality and location of cycle parking as well as the quantity.

Office parking

Real estate agency Savills states that "Office buildings can include amenities that attract employees who may be inclined to bike to work, and by accommodating these people developers can encourage them into the office and draw more value to their buildings and communities."

Delivery of such facilities is variable both in terms of quantity and quality. This clearly determines their use now and over the life of the building. Contemporary buildings may not last as long as the Tower of London but are estimated to have working lives of 60 years. Thus while the London Plan, and its standards, may span a 25 year period, developers and their clients need to consider a much longer period.

In terms of quantity the British Council of Offices (BCO) currently advises providing cycle parking for ten percent of staff but we note that in Paris the required provision is for 15% of staff. The current London Plan quantity requirements for cycle parking in offices differs between high cycle parking zones (figure 10.2 in the London plan) and most of Outer London. The high parking zone broadly covers areas where cycling levels are known to be high – thus in Hackney, for example, 15% of people already cycle to work (based on 2021 census) and that is likely to rise.

The uptake of cycle parking is increased by: the provision of convenient cycle infrastructure on roads (and the Mayor is committed to increasing access to quality cycle routes for 70% of London households from the current 28% by 2041 – well within the lifetime of buildings set to be built under the London Plan); availability of cycles and cycle storage; incentives, including corporate participation in the national 'Cycle To Work' scheme (which enables purchase of a cycle from a salary before tax) and company specific incentives.

Fairly obviously, the number of people in any workplace is determined by the density of occupation – prime office space for a legal firm may allow 21 sq. metres (Net Internal Area, NIA) per person whereas a charity, call centre or a start-up may allow 8 sq. m, or less per person. We note that 8 Bishopsgate in the City of London was built in anticipation of a 1 to 8 sq. m ratio, as was 60 London Wall. BCO advises 12 sq. m per person but that depends on developer choice.

In practical terms, a building with NIA of 10,000 sq m could hold a work force of 476, 833 or 1250 people depending on the density of occupation. The number of cycle parking spaces allowing for 10 percent of staff cycling to work (as recommended by the BCO) would then vary from 47 to 125 – based on the current (2021) Hackney cycle to work figure of 15%, the range rises from 71 – 187.

LCC's experience as a tenant has been that cycle parking provision in the workplace is, currently, only just meeting demand. At refurbished premises, rented by LCC, in Bermondsey there was no secure cycle parking; at premises in Wapping secure cycle parking was provided for approximately 10% of workers and it was overflowing in summer months; at premises in Farringdon parking is provided for 8% of staff and it is full at peak times with heavier electric bikes, trikes and other larger cycles set against walls. We note that TfL's Cycling Parking Strategy advised that on-street cycle parking at stations should continuously provide 30% more spaces than peak demand to allow for growth in usage.

It is notable that Google, one of the world's most successful and forward-looking firms plans to provide cycle parking spaces for an estimated 15% of its workforce at its new UK HQ in King's Cross and it will ensure convenient access. Developers and planners should consider that future clients, following Google's example, may require higher levels of cycle parking provision than that recommended by the BCO.

We note that the assumption that cycle parking must be located in (costly to excavate) basements is not necessary. As some have commented, cycling, a sustainable mode of transport, merits 'celebration' and placement of indoor cycle racks at street level can be both convenient and an attractive element of the streetscape.

Key recommendation 5: The London Plan should look to the future and allow for at least 15% of office staff to park cycles, conveniently, securely and safely. Developers should provide data on the proposed density of occupation. Space provided per bike should be defined to prevent the installation of low-grade parking racks.

Location and quality

Both the quality and location of cycle parking must be such as to encourage rather than discourage its use.

The most recent guidance on the quality of provision is provided in the Bicycle Association's Standards for Cycle Parking 2021. The quantity of provision in that guide relates to the UK, rather than London where the growth in cycle use means provision needs to be higher.

We note in particular, that where two-tier parking is used, hydraulic assistance must be specified. Specifying narrower gaps between cycles than advised can lead to bikes getting tangled up.

We note that in Paris the cycle parking regulations for new buildings specify a given space of 1.5 sq. m per cycle (including circulation space) which enables developers to provide a mix of Sheffield stands (for adapted bikes, trikes, cargo bikes and e-bikes), as well as two-tier and vertical stands.

Key recommendation 6: Adherence to the Bicycle Association's Standards for Cycle Parking 2021 (and future iterations) as a minimum should be referenced in the London Plan.

Hire bike cycle parking

See below for planning requirements regarding hire bike parking used by office workers and others.

Sharing cycle parking

Given there is an undersupply of cycle parking in London as a whole, it would be welcome if new offices, or residential developments with a current oversupply were to sublet some of that parking to neighbouring offices or blocks. This was done formally at the large TfL-funded London Bridge cycle parking compound of which half was sublet to a local firm that had no cycle parking of its own. Modern card and fob entry systems enable firms to control access to such compounds. It is also evident that some public access (paid for and card/fob accessed) cycle parking compounds are used for overnight cycle storage by local residents who have no cycle storage of their own.

Residential Parking

LCC member experience is that residential cycle parking is either poorly located and insecure (in terms of both theft and personal safety) or well designed and secure but overfull. In an East London development that is less than ten years old, for example, 34 cycle parking spaces are provided, in a small secure compound, for 28 flats and all spaces are full with additional cycles leaning against walls. At another, older, development nearby a large underground parking facility is little used because of fears of theft and personal safety – instead bikes re kept on balconies.

National statistics show that 43% of people over the age of 5 have access to a cycle. Cycles, whether belonging to adults or children, require secure storage and it is welcome that the London Plan of 2017 advised that a cycle parking space should be provided for all new homes and two spaces should be provided for two-bedroom homes and above. It is vital, however, that such parking spaces are convenient and secure.

Good practice is demonstrated in an Olympic Park development which provides an alcove for two cycles in the hallway next to the front door.

Locating cycle parking in large unsafe basements deters usage. Compounds should not exceed 100 cycles (and preferably 50) so that established users are able to provide informal surveillance, and card/fob entry with camera oversight should be provided. As noted above, the Bicycle Association cycle standard should be followed.

We note that families that choose to cycle invariably provide a cycle per child or adult. So even in a two-bed home there may be four cycles plus any cycles that are used for specific purposes like a cargo bike for carrying smaller children or a sports or mountain bike for leisure use.

Hire bike parking

While it is clear that a proportion of the welcome growth in cycling stems from the use of the estimated 50,000 hire bikes in the capital, the lack of convenient and orderly parking for these vehicles has been widely commented on.

The rapid growth of dockless hire bikes came after the last iteration of the London Plan, so this was not considered in the parking guidance. What is clear is that shared hire bikes are routinely used for commuting and other journeys. Destinations such as employment zones, stations and large residential developments all generate cycle hire trips which require cycle parking provision.

Lime has estimated that provision of approximately 25 cycle parking 'corrals' are required per square kilometre. And TfL has itself produced high-quality initial data analysis that should be referenced on dockless hire parking bay provision densities by area.

While such parking can be designated by local highway authorities, the developers of new buildings could contribute to demand from their future tenants by providing space, within their curtilage, for shared hire cycles.

E-bike parking

We note the recent concern over e-bike battery fires in the UK and the negative impact this has had on e-bike sales. This is likely to be resolved by government action by the time the new London Plan is approved. Thus, the Plan must consider significant growth in e-bike use and related cycle parking. In much of Europe e-bikes account for more than 40% of bike sales with more than 2 million sold per annum in Germany compared to around 150,000 currently in the UK.

The All Party Parliamentary Group for Cycling and Walking recently published its report on e-bikes, and their safety, as well as on so called fake e-bikes and their use by gig-based delivery riders. Their recommendations include regulations governing online e-bike and battery sales and establishment of guidance for landlords on legitimate e-bikes.

Once these initial concerns are addressed it is likely that the UK, like the rest of Europe, will see a rapid increase in e-bike sales and use. The London Plan must therefore provide for access of such cycles to cycle parking zones, and in the case of larger offices, access to charging facilities.

e-bikes are heavier than conventional bikes and versions such as e-cargo bikes for loads and children, and adapted bikes for Disabled people can be both wider and longer than conventional bikes. Provision for such e-bikes must be provided in both residential and office accommodation. Wheels for Wellbeing, which represents Disabled cyclists, recommends allocating 10 percent of cycle parking for Disabled cyclists.

Conclusion

Given the above, the London Plan should consider higher levels of assumed cycling to work and ownership of cycles at homes, as well as update cycle form factors to provide additional space per cycle and for wider and larger cycles for both home and office

provision as well as on-street secure and other locational provision (amenities, transport interchanges etc.). Rather than look at some examples of underused cycle parking currently, the London Plan must continue to consider future demands for the foreseeable lifetime of the buildings being developed under the Plan.