

15 July 2022

Greater Cambridge Shared Planning Service  
Cambridge City Council  
PO Box 700  
Cambridge  
CB1 0JH

Dear Sir / Madam,

## **A new road classification for Cambridge: Greater Cambridge Partnership Consultation 2022 Response on behalf of Barclays Nominees (George Yard) Ltd c/o Abrdn**

We write on behalf of our client, Barclays Nominees (George Yard) Ltd, C/O Abrdn ('the Client'), which is the owner and manager of the Lion Yard Shopping Centre located in central Cambridge. This response relates to the Greater Cambridge Partnership ('GCP') consultation regarding 'A new road classification for Cambridge'. The consultation period ends on 18 July 2022.

Lion Yard is a modern covered shopping centre located in central Cambridge. It is bounded by St. Andrews Street on its eastern boundary, Corn Exchange Street on its western Boundary, Petty Cury on its northern boundary, and the Grand Arcade Shopping Centre adjoining its southern boundary. Lion Yard is a key shopping destination within Cambridgeshire and forms an important national and regional hub, which attracts a significant footfall from residents, students and tourists. The Client represents the interest of the commercial viability and success of the Lion Yard Shopping Centre.

The Client is currently actively investing into Cambridge City centre and is due to start works on several planning permissions which seek to significantly improve the shopping centre, the surrounding public realm and setting of the historic core. These include:

Application Number	Description of Development	Planning Status
22/1538/FUL	Change of use of retail units (Class E) facing onto St Andrews Church within Lion Yard to create a new food and beverage quarter (Class E/Sui Generis); provision of new roof terrace looking over St Andrews Church, improvements to the public realm, provision of plant, cycle parking and associated alterations to the shopping centre façade.	Approved – June 2022
20/03779/S73	Variation of condition 2 (Approved plans) of planning permission 18/0829/FUL dated 18 October 2019 for the change of use of St George House and Lion House from office (Class B1) to hotel (Class C1); relocation of nightclub (Sui Generis) in St George House to basement service yard in Lion Yard shopping centre (Class A1); relocation of the substation within the basement; associated alterations to the buildings including new windows,	Approved – November 2020

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	new entrance to the nightclub from the shopping centre, new goods lift for the hotel and cycle parking		
18/0829/FUL	Change of use of St George House and Lion House from office (Class B1) to hotel (Class C1); relocation of nightclub (Sui Generis) in St George House to basement service yard in Lion Yard shopping centre (Class A1); relocation of the substation within the basement; associated alterations to the buildings including new windows, new entrance to the nightclub from the shopping centre, new goods lift for the hotel and cycle parking	Approved October 2019	–
18/0830/FUL	Demolition and redevelopment of the existing retail kiosk units (Class A1) to the south of St Andrews Church, to create a new food and beverage quarter (Class A3/A4); change of use of retail units (Class A1) facing onto St Andrews Church within Lion Yard to create a new food and beverage quarter (Class A3/A4); provision of new roof terrace looking over St Andrews Church, improvements to the public realm, provision of plant, cycle parking and associated alterations to the shopping centre facade	Approved – March 2019	

Table 1 – Recent Planning Permissions at Lion Yard

The Client has also submitted representations to previous transport policy consultations such as Making Space for People Interim Consultation (2019), jointly with other major town centre landlords.

**A new road classification for Cambridge: Consultation 2022**



Figure 1. Indicative Road Classification

The GCP is currently undertaking a review of the existing road network user hierarchy in Greater Cambridge, which was last updated in the 1980s. The review of road classifications in Cambridge form part of GCP's wider City Access project, which seeks to explore how people move around the city and encourages greater use of public transport and active travel rather than the private car. Through a reclassification of the central road network, GCP aim to reduce traffic on local roads and streets by restricting vehicular access to a few tiered roadways, limiting them to Primary Distributer Roads, Secondary Distributer Roads and Area Access Roads.

The consultation document presents an indicative road classification within Figure 1 (shown above), this map demonstrates how the road classification could alter the road network in central Cambridge. The location of Lion Yard Shopping Centre is shown with a red star.

As shown in Figure 1, roads in central Cambridge are proposed to predominantly become Local Access streets and Civic streets. Several roads in the centre of Cambridge will be reclassified as Civic streets (shown in yellow), these streets would grant priority to walking and cycling, restricting motor vehicle access except to provide access for local residents, those with limited mobility and for deliveries/servicing. It is proposed that that any motor vehicle access will only be permitted at certain times of the day (outside peak times) and that buses would not normally be allowed.



Figure 2. Bus routes and pedestrian /cycling priority

This consultation also proposes an updated bus route map which will introduce pedestrian and cycling priority streets where personal vehicle and bus access will be restricted, except via a zero-emission shuttle bus which will provide city centre access for those with mobility issues. This is shown below in Figure 2, with Lion Yard again shown as a red star. As shown in Figure 2, there is no motor vehicle access or available public bus access to the central area of Cambridge or to Lion Yard Shopping Centre.

## Response to the new road classification for Cambridge

The Client supports the ambitions and objectives of GCP's wider City Access project, in particular the need to alleviate major pressures on the local economy caused by congestion and pollution. The ambition to deliver a new bus network and an enhancement to the cycling and walking routes whilst also creating high quality public spaces are all recognised as beneficial proposals to improve the urban environment in central Cambridge.

After a review of the indicative proposals for the new road categorisation, proposed bus routes and pedestrian / cycle priority streets, the Client considers the changes to be overbearing and misaligned with objectives to support the retail environment within central Cambridge. The restrictions on motor vehicles as currently proposed are perceived as severe and carry significant detrimental impacts on the viability of both Cambridge City Centre and the Lion Yard Shopping Centre.

Concerns regarding the vitality and viability of the city centre and retail core of Cambridge, through proposed changes to the highway network, were shared during the 2019 Making Space for People Interim Consultation, where the Client responded in a shared letter with USS. This has been reattached to this letter in Appendix 1 for completeness. It is our client's belief that these remain valid concerns and have not been addressed through this or any subsequent consultation, presenting a real risk to Cambridge City Centre's vitality and viability.

These areas of concern are:

- Updated baseline data and modelling must be undertaken and made public before any decisions are made which could cause potentially unhospitable conditions for city centre retailers and landlords.
- There is little to no analysis on the commercial impact of these proposals.
- Plans which will support and fund alternative modes of travel should be brought forward before any pedestrianisation is implemented in the city centre.
- Further consideration should be given to movements and the customer experience of those who travel to Cambridge, from neighbouring towns and settlements for both their comparison and convenience shopping.
- Balance should be sought so that pedestrian prioritisation can occur without detriment to business services or place undue financial burden on existing businesses, through elaborate servicing arrangements via the agent of change principle.
- A road hierarchy which does not differ between motor vehicles and service vehicles or support the importance of service and delivery vehicles in a successful city, is unsustainable.

- The strategies that are being developed place too much emphasis on pedestrians and cyclists to the detriment of other road users who help make Cambridge City a successful commercial hub, regionally and nationally.

The remainder of this letter will explore potential issues with the current indicative proposals and the direct impact they will carry for Lion Yard. The Client offers alternative approaches for achieving the ambitions and objectives of the City Access Project. This representation will also seek further clarifications on the details of the proposals put forwards within the consultation document.

## **Impacts on Cambridge and the Lion Yard Shopping Centre**

The proposed new road classifications will carry several negative impacts on the vitality and viability of Cambridge City Centre. These issues need to be carefully considered and reflected within any emerging road classifications.

### Traffic Displacement

The restriction of motor vehicle transport within the city centre will lead to increased levels of vehicle congestion on periphery roads to the city centre. As motor vehicles will be restricted from driving or parking in the city centre areas road users will be forced to increasingly use Area Access streets or, Primary and Secondary distributor roads around Cambridge to navigate the city. This will impact Cambridge by allowing city centre congestion to spill out into the whole of Cambridge, significantly reducing the mobility of the wider area and those travelling from outside of Cambridge.

If traffic is displaced to periphery roads there is no guarantee that the active travel will be able to thrive within the city centre, as the surrounding roads become more dangerous due to the increased traffic. This may serve to limit the number of people who feel safe to walk or cycle into the city centre, as there will become a series of congested and busy roads that serve as barriers to access the city centre.

Furthermore, the traffic displacement to periphery roads may have the unwanted impact of reducing the reliability and user uptake of the public bus network. Many of Cambridge's key periphery roads which serve the city centre are single-laned, meaning it is not possible to implement a bus lane, some of these roads include; Queens Road, the A1134, the A603, Chesterton Road and Maids Causeway. Increased congestion along these roads from traffic displacement will decrease the reliability and efficiency of the bus network, this would directly contradict the objectives of GCP's Making Connections project which seeks to improve public transport and promote active travel.

### Access to Cambridge City Centre

The new road classification proposes that unless an individual has diagnosed mobility constraints then they will have to access the city centre via means of active travel. However, this does not reflect the capabilities or the desires of all citizens within Cambridge. For instance, individuals may be unable to walk easily and unable to complete walks throughout town without accessible bus links in the city centre. Similarly, not everyone has access to a bicycle or the ability to ride one. By restricting central Cambridge to active travel, this may serve to restrict vulnerable individuals who rely on motor vehicle transport from visiting and supporting the city centre.

The increased difficulty in accessing the city centre may create a decrease in the footfall as individuals are put off visiting the area due to concerns relating to inaccessibility. This is particularly impactful for the city

centre high street, which has been struggling to recover to pre-covid levels due to decreasing desire for in-person shopping. Therefore, it remains important to undertake baseline data gathering and modelling to fully appreciate the impact Covid has had on travel patterns and access to Cambridge City Centre.

## Functionality of the Cambridge City Centre

The new road classifications for Cambridge, as proposed within Figure 1, seem incompatible with a thriving city centre as it limits the operational necessity of the roads which supports the local economy. The city centre uses within Cambridge rely heavily on the existing road network to ensure it can continue to function. For instance, the variety of uses from banks to restaurants to jewellers to technology outlets require a varied and unique degree of support from the road network. Primarily, this includes access for deliveries, to allow the movement of goods, both inwards and outwards.

This requires the coordination of several supply chains, resulting in several deliveries across the town centre with varied timings. For city centre units, to ensure their functionality it will typically be necessary to maintain current levels of road access.

The Client is concerned how the new road classifications would support the operational requirements of its tenants, particularly when considering deliveries. Motor vehicle trips which support the functionality of retail units within the town centre should be supported, as this will enable the city centre to continue its operation in a manner which is viable and supports a thriving Cambridge City Centre.

The indicative road classifications shown in Figure 1 would also inhibit growth and further development at Lion Yard, through restricting motor vehicle access and turning the surrounding roads into Civic Streets with pedestrian and cycling priority. Demonstrated through the proposals set out in table 1, the Client is investing significantly within the city centre to provide a new hotel, improved night-time economy uses, a new food and beverage quarter, improved business and office facilities, high quality retail floorspace and significantly improved public realm to enhance the historic cultural assets within the town centre. These proposals and investments have been made to help reinvigorate Cambridge City Centre with a suitable mix of uses which are based on detailed technical work underpinned by the level of service and accessibility provided by the existing road network. This includes the supply chain and logistics of the build phase as well as the end operational servicing requirements of future tenants. Without motor vehicle access, Lion Yard will lose its flexibility to cater for new retail tenants and deliver development which seeks to improve the city centre area.

## Safety concerns

Removing activity from the City Centre will significantly reduce the natural surveillance and potential safety in parts of the city centre if further investment into secured by design and CCTV is not also sought by the Council alongside these proposals.

The Client is proposing to bring forward improved leisure entertainment and night-time economy uses to the City Centre, which were fully supported by the Council at the application phase. This includes a flexible food and beverage unit and a nightclub within the ground floor and basement of the Lion Yard Shopping Centre. The Client is concerned that the indicative proposals of new road classifications have potential to raise safety concerns for visitors to Cambridge City Centre, particularly at night. Many people may feel vulnerable to criminal behaviours and harassment, especially when walking alone and/or at night through empty streets.

Without twinned investment into surveillance and safety within the city centre, individuals may feel as though they are putting themselves at risk by visiting the city centre, which could lead to reduction in visitors and a potential increase in criminal behaviour centred around Cambridge City Centre.

## Grand Arcade Car Park

Further concerns arise regarding the appropriateness of the proposed new road classifications when considering the Grand Arcade Car Park, which serves the city centre and the Lion Yard and Grand Arcade Shopping Centres by providing 953 car parking spaces (including 35 blue badge bays). Access to this car park is essential as it is the only major car park located within Cambridge City Centre, and through the number of spaces available it can provide a safe space for visitors to park their car, which subsequently supports the viability of the town centre. Under the indicative road classifications shown in Figure 1, access to the Grand Arcade Car Park will be severely restricted, with the only access point to enter and exit the car park being along Downing Street, which will be classed as a Local Access Street up to the car park entrance before becoming a Civic Street. The road closures demonstrated within Figure 1 will result in significant congestion and bottlenecks along Tennis Court Road, Trumpington Street and Downing Street, with the impacts likely spreading into the wider transport network in the south-west of Cambridge City Centre. To fully understand the impact this is likely to have, the Client urges the Council to make any baseline data and modelling available to be reviewed.

If motor vehicle traffic in the city centre is restricted this could also render the Grand Arcade Car Park unviable, as cars are unable to access the space due to road closures and severe congestion on the roads which remain open. This would lead to a situation where there are no available parking options within immediate proximity to the city centre and would threaten the long-term viability of the retail core, as it would see a substantial decline in revenue through lost car parking fees and lower footfall.

## Disputed benefits of road closures in Cambridge

Mill Road, Cambridge provides an empirical example of a road closure to motor vehicles within Cambridge, and the subsequent issues and concerns which have led to the re-opening of the road section. The Mill Road Gate Experimental Traffic Order was discussed at the Highways and Transport Committee meeting on 27 July 2021, a year after it was closed. During the road closure, Cambridgeshire County Council held a consultation to gain local views on the closure, 577 respondents were recorded, of these respondents, 51% (293) objected to the Mill Road closure.

From the objections made there were a broad range of valid issues raised by local stakeholders, these included; business, impact on surrounding areas, safety, walking and cycling, difficulty of making deliveries, accessibilities and equalities, air quality and noise. Of note, 87.6% of businesses indicated they were suffering because of the bridge closure and raised concerns relating to increases in congestion and journey time within the local road network.

As evidenced through the highly controversial empirical example at Mill Road it is necessary to properly analyse the outcome and impact of road closures, which should then inform the reclassification of the road network. Considering this case-study, the currently proposed road classifications should be revisited and tested to ensure they minimise issues for Cambridge.

## **Alternative Options**

The Client supports the need to foster active travel across Cambridge but seeks a separate approach to the ones indicatively proposed within Figure 1 and Figure 2.

As set out in this letter and in previous consultation responses, a balance should be sought so that pedestrian prioritisation can occur without detriment to business services or place undue financial burden on existing businesses, through elaborate servicing arrangements through the agent of change principle.

A digitally enabled solution which is part of a comprehensive package of works, based on collaboration with city centre stakeholders, sound data and modelling would be a preferred approach. The Client would be happy to work with the Council to ensure that business as usual can occur in the city centre so that the proposals for significant investment can continue and that existing and future tenants are provided with certainty that their servicing requirements can be met without compromise.

## Further Clarifications

- *How will exception to the restrictions be enforced and how will the exceptions be determined?*
- *Who will benefit from the restrictions?*
- *What is the proposed logistics and operations of seeking of consolidating deliveries to ensure they are carried out as a single delivery?*
- *How will it be possible to deliver new development in the city centre without access?*
- *Has GCP considered all the issues outlined above?*
- *Is there any evidence that indicative proposals will support the viability of the high-street and shopping centres?*
- *What will happen to the uses of the various multi-storey car parks in Central Cambridge?*

## Summary

Thank you for the opportunity to comment on the new road classifications for Cambridge. In summary, the Client welcomes the review of the road classifications and supports Cambridge's aspirations to improve the road network and increase active travel within Cambridge.

However, as set out in this letter, the Client seeks significant alterations to the proposed indicative road classifications to reflect the abovementioned range of issues which are relevant to both Cambridge City Centre and Lion Yard Shopping Centre. These issues include:

- Traffic Displacement;
- Access to Cambridge City Centre;
- Functionality of the Cambridge City Centre;
- Safety concerns;
- Grand Arcade Car Park; and
- Disputed benefits of road closures in Cambridge.

We look forward to receiving confirmation of receipt of these representations and request to be kept informed on progress of the next stage of the plan process. Should you wish to discuss any of the matters above, please do not hesitate to contact Josh Dickinson (jkdickinson@deloitte.co.uk / +44 20 7007 4551).



Yours sincerely

*Deloitte LLP.*

Deloitte LLP

Appendix 1: Making Space for People Interim Consultation (Representations on behalf of Universities Superannuation Scheme & Aberdeen Standard Investments)

14 October 2019

Greater Cambridge Shared Planning Policy Team  
Cambridge City Council  
PO Box 700  
Cambridge  
CB1 0JH

Dear Sir/Madam

**Making Space for People Interim Consultation  
Representations on behalf of Universities Superannuation Scheme & Aberdeen Standard  
Investments**

Universities Superannuation Scheme (USS) and Aberdeen Standard Investments (ASI) are major long term investors in Cambridge for the long term. Grand Arcade and Lion Yard being respectively their largest assets, alongside significant landholdings held by USS at Clifton Road and Trumpington. USS and ASI, therefore, are committed to supporting the city centre and making it a great place to live, work and enjoy.

Cambridge has seen unprecedented growth and its success inevitably mean there are many challenges affecting everything from transport to housing and the environment. USS and ASI welcome initiatives and opportunities which will help define the future success of the city centre but this must be for all of its users.

Our client has a number of concerns that they would like to raise and would welcome the opportunity to discuss these with the Council further.

**Methodology**

If the SPD is to be a material consideration, it should reflect the strategic principles of the adopted Local Plan. Notwithstanding this, we are mindful that the Council has commenced a Local Plan review and it would be helpful to understand how the SPD will align with that. We consider the Local Plan is already out of date and urge the Council to consider carefully how the SPD will respond to the needs of a growing population providing public transport alternatives and innovative ways of servicing and supporting deliveries.

As we explained in our reps to the Grafton Masterplan SPD (November 2017), our client also continues to express concern about the reliance on the Cambridge City Council baseline studies, such as the Retail Report which is out of date, but underpins the retail needs of the city. We raised concerns at the time that the strategy employed was ambitious in light of the changing face of retail which indicated that retailers were reviewing their real estate portfolios. This continues to be a very volatile area and one where significant change is occurring. It is important, therefore, that any future guidance does not hinder the ability of the retail and leisure sector to operate effectively as it is those uses which contribute significantly to the vitality and viability of the City Centre.

Technology and data should also underpin the methodology for preparation of the SPD. Page 10 of the Baseline Report identifies the significant strength that Cambridge has in technology yet none of this has been used to underpin the SPD strategy. There is no reference to Smart Cambridge, established in 2015 by the Greater Cambridge Partnership, where initiatives could be used to leverage technology investment to improve the performance of everything from transport to how a city reduces CO2 emissions. The Cambridge & Peterborough Independent Economic Review (CPIER) also references digital technology to enable more effective use of current transport resources. This is not analysed in any way in the reports.

## **Transport access**

The ambition for a 24% reduction in traffic levels referenced in the consultation report at paragraph 1.1.6 is welcomed but this will be a significant challenge without substantial planning and investment in alternative modes of transport and routes. This also needs to evolve with the Local Transport Plan and the Cambridge & Peterborough Combined Authority Interim Mayoral Transport Strategy.

The consultation report and Baseline Report are not supported by sufficient empirical evidence as to how the city centre functions and how people access it. Although there are references to survey work, this does not extend to analysing where people come in from further afield. We note the reliance on the 2017 ANPR movement surveys which are already 2 years old.

On review of the documents, there also appears to be a bias towards pedestrianisation and cyclists already within the City as opposed to those coming in. Provision of alternative means of access should be a precursor to any pedestrianisation. This includes extending the capacity of park and rides and improving their efficiency, together with other public transport initiatives. Smaller initiatives, such as rearranging traffic lights and widening pavements, can also make a significant difference without the need to remove buses, service vehicles etc.

Any proposed tunnelling for the metro is many years away and it is important that the focus is on what can be achieved in the short term. However, punitive measures, such as the Congestion Charge need to be properly linked to investment in suitable public transport.

## **Analysis of other cities**

The report references changes achieved in other cities. We would question whether parallels can be drawn with the cities listed. Nantes, for example, has a population of 600,000 compared to Cambridge of 129,000. It is also France's 6th largest city whereas Cambridge is the UK's 54th. Nantes, as a result of its size, will benefit from better access, particularly as it has a regional high speed train link to Paris and Bordeaux. Its scale probably means that it is the beneficiary of more significant funding.

We would suggest that Cambridge's success in growth and inward investment, its substantial student population (32% of population versus Nantes 9%), heritage and planning constraints, means it is unique in how it can manage change. These components mean it is vital to understand how those that come to the city as tourists or those that shop, or indeed students use it. Using data to define the current demographic base and how that might change is essential to understanding what the future needs of the City are. There is limited reference in the report to the demographic changes which are taking place and how this can be innovatively addressed to meet those needs. There is a need to increase accessibility, through sustainable means for all users, not hinder it.

## **What will make Central Cambridge a great place to be in?**

The emphasis of the document appears to be to make it a better City Centre for pedestrians. This creates easy wins, but should not be to the detriment of being able to service and deliver goods. Paragraph 2.4.1 of the consultation report suggests removing the dominance of cars, delivery vehicles and buses. Without those modes of transport, we are unclear how the existing city centre would function. There will be challenges with

servicing, and access by bus and taxi, if a balance with pedestrians is not struck properly. It also only works if investment in public transport is integrated with other strategies, such as for servicing.

In addition, new growth areas in the City must be supported by public transport otherwise it will just exacerbate existing problems.

### **Have we got the 'street user hierarchy' right?**

We do not consider it appropriate to have a hierarchy of street users. All have different demands but are necessary for a successful city. The SPD should differentiate between motor vehicles and service vehicles and support the importance of service and delivery vehicles in a successful city centre.

### **Do you agree with our Vision for the kind of place Central Cambridge could be?**

We would suggest the latter part of the vision strapline '*Central Cambridge should be a healthy, vibrant and engaging place that is accessible, well run and welcoming to residents and visitors alike*' should be amended to read '*all that use it*'.

With a growing population and a booming economy which is powered by ambition and innovation, the vision should be to harness that growth and build a city for the future. Cambridge is a place filled with opportunity and ideas and this should be captured in a more proactive innovative way. Any vision should also be underpinned by data to support decisions on what the future of the City Centre will look like.

### **Have we identified the right aims and objectives for the project?**

We support the core aims and objectives of the consultation report but consider that they could be more dynamic and innovative, with reference to our comments above.

At a more granular level, the movement and space focused strategies are not realistic where they relate to removing the dominance of cars, delivery vehicles and buses from the streets. There is no reference to the commercial impact on the core City Centre if this approach is followed. These strategies run counter to the economic strategies on page 31 of the report. By restricting access further, ambitions to support growth in a wider range of uses, local businesses and encourage more cultural activities will not be achievable. Furthermore, restricting access further will exacerbate the inability to enter and cross the City by alternative means of transport.

We would question what the reference to "beyond typical retail functions" means in S14 and this reflects our earlier comments about the structural changes happening with retail and fully understanding the longer term implications for the City arising from this. Similarly, the reference in S15 to 'café culture' does not reflect recognition of the issues this market also faces.

### **Do the strategies cover the right themes?**

The strategies place too much emphasis on pedestrians and cyclists to the detriment of other users who help to make the City work. There is no reference to connecting in with the wider City. The use of technology to help address some of the challenges is not explored.

### **Statement of Consultation**

The statement refers to consultations with "people living, working and studying in Cambridge". However, there is no reference to engagement with landowners or employers.

### **Baseline Report**

Notwithstanding our comments above, we have reviewed the Baseline Report and make further observations below.

- Chapter 2 notes that the City has lost ground to other European cities in rankings. The pressures facing the City in respect of access to affordable housing and the cost of living will play a part in this change.
- The need for a successful evening economy is referenced throughout the document. However, this relies on a successful transport system which should be a priority first before restricting existing modes of transport.
- One of the key findings of the report was that stakeholders are frustrated by current conditions. However, there is a lack of evidence of this in either the main document or Baseline Report. We would question whether the stakeholders included landowners and employers.
- The reference to electric modes of transport is limited at a time when this is increasingly part of the discussion about its merits in reducing carbon emissions and improving air quality and the infrastructure needed to support it.
- The reference to the preparation of a city centre delivery and servicing strategy is welcomed.
- There only one section (Section 6.3) devoted to the City's future. There is no reference here to how technology can help with planning this.
- The "Change Means Choice" approach on page 98 appears to suggest that it is a simple choice to prioritise sustainable modes of transport when in reality this choice has significant implications on the way the City functions.

## Summary

In summary, the general aspirations of the Making Spaces for People consultation are supported. However, we have a number of reservations and concerns about the underlying strategy proposed for the SPD and the methodology employed.

If you have any queries or require further information in regard to these comments, please do not hesitate to contact me. In the meantime, I would be grateful if you could confirm receipt of this letter.

Yours faithfully



**Caroline McDade**  
Deloitte LLP