



## **Response to the Mayor's Draft Transport Strategy 2017**

### **About the London Cycling Campaign**

The London Cycling Campaign (LCC) represents the interests of those who cycle in the capital and those who want to. Member-led, we have 12,500 full members and another 30,000 supporters.

Our vision for London is a city where people of all ages and abilities can cycle safely and enjoyably, and we believe that making cycling the number one transport choice for everyday local journeys will generate immense quality of life, environmental, health and economic benefits for everyone.

We campaign for London's political leaders and decision-makers to remove the barriers that prevent people benefiting from the freedom and convenience that cycling brings, including by developing and proposing our own innovative solutions.

We also work in partnership with businesses, local authorities, community groups, schools and other institutions to directly promote cycling at the grass roots and across all London's communities.

## Executive Summary

LCC welcomes the opportunity to comment on the Mayor's Draft Transport Strategy (MTS).

Making London's transport system as effective as it can be is the primary formal responsibility of London's Mayor. Transport commands the lion's share of the Mayor's financial powers, staffing and the bulk of the institutional capacity at his disposal.

Given the challenges that the Mayor faces from a rapidly growing population, air pollution, congestion, inactivity, inequality and climate change, he has rightly decided that a radical new Mayor's Transport Strategy (MTS) is needed. The Mayor is sensibly seeking to make sure the MTS integrates properly and fully with all the other strategies being developed, culminating in a new, long term London Plan.

**The Mayor's main levers of power centre on transport, so it follows that an effective MTS will be crucial in ensuring that the new London Plan delivers the "City for all Londoners" to which the Mayor rightly aspires in his overall strategy for the capital.**

We recognise that policy goals for transport in London have to meet multiple objectives – from keeping London moving and reducing our city's environmental footprint to reducing inequality and improving public health: **LCC believes that unlocking the huge potential for cycling and walking as means of everyday (particularly local) travel will be critical to achieving these public policy goals.**

Further, the responsibility for doing so does not rest with the Mayor alone: **London's boroughs, which hold responsibility for 95% of London's road space, must also play their full part in achieving these objectives, within the framework and over-arching policies set by the Mayor and TfL.**

The MTS has been published at a time when the transportation of both people and goods is rapidly evolving, including as a result of disruptive technologies that are changing how people access cars – and indeed cycles. No-one can accurately predict the future effect of disruptive technologies. But we can describe what the long term future surface transport should look like, if it is to be efficient, environmentally and socially-equitable:

- Walking and cycling will be the principal mode for local and first/last stage journeys
- The model of car use will change from ownership to convenient and affordable access to shared services such as car clubs
- Dynamic road pricing and reallocation of road space and priority to cycling and clean buses will keep traffic flowing
- Owned and hired e-cycles will hugely extend the range of cycling journeys
- e-cargo bikes will dominate last mile deliveries within a consolidated freight system
- Planning, booking, and payments for multi-modal journeys will be made straightforward via consumers' smartphones, as will access to real-time data on current usage levels and pricing

None of this will happen without the Mayor setting a long term direction of travel. **We therefore welcome, and commend the Mayor's radicalism in setting a long term goal that 80% of surface transport journeys by 2041 should be by foot, cycle or public transport. We also support the Mayor in opening the door to dynamic road pricing and harnessing the most innovative technologies to create an affordable, clean, integrated and efficient transport system.**

A mass expansion of cycling will be critical to achieving the goals above – and one the most efficient and cost effective ways of doing so. And making our roads safe enough for people of all ages and abilities to enjoy cycling is at the heart of this. LCC's *Love London Go Dutch* campaign in 2012 was instrumental in winning and then defending a new approach to cycling safety from the previous Mayor, based on high quality, international standards of design; we recognise and welcome the fact that the current Mayor has made very important commitments to build and expand on that, including promising to meet the agenda of LCC's 2016 *Sign for Cycling* campaign by:

- Tripling the extent of protected space for cycling and completing the current Better Junctions programme
- Enabling every borough to access funding for a major walking and cycling scheme
- Taking the necessary steps towards making Direct Vision lorries the standard type on London's streets

We also recognise further steps the Mayor has already taken:

- Appointing London's first, full time Walking & Cycling Commissioner
- Creating a new £2.1 billion Liveable Neighbourhoods programme (over five years)
- Expanding the cycling component of the above to £770 million (over five years)
- Creating a new Direct Vision lorry standard and setting targets for taking the most dangerous lorries off London's streets.

However, it is obvious to say but important to stress that we are already a long way into the Mayor's second year in office. The extent of effort required in the last 2-3 years of the previous Mayor's term of office - i.e. to initiate the three Mini-Holland schemes and the new East-West and North-South Cycle Superhighways - illustrates how much time it takes to get major cycling schemes from the drawing board to the street.

Whilst LCC understands and appreciates the methodical and comprehensive way in which the Mayor is developing his multiple, cross-cutting strategies, we are consequently deeply concerned that the pace of change is too slow to achieve all the specific commitments in response to LCC's *Sign for Cycling* campaign and his manifesto promise to make London a "byword for cycling". Worse still, too many of the new road redevelopments currently coming through the system offer poor quality provision for cycling, leaving serious dangers unaddressed.

TfL's delivery of safe cycling infrastructure has been too slow since the Mayor's election despite the very welcome uplift in the five year cycling budget. Accordingly, **action must be taken immediately, and sustained throughout the remainder of this mayoralty, if London is to be put onto the correct trajectory to achieve the bold long term target set by the Mayor for 80% of all surface transport journeys to be made by "sustainable" modes by 2041. This action must include energetically pursuing the Cycle Superhighway, Quietway and Liveable Neighbourhood programmes during the remainder of this mayoralty - implementing them at the highest quality standards and ensuring boroughs are fully engaged and positive about these programmes and the strategy's direction.**

We therefore call on the Mayor, through his Cycling and Walking Commissioner, to ensure that TfL urgently publishes and pursues a **Cycling Delivery Plan that will guarantee all the Mayor's cycling commitments for this term of office are met.** This plan should in particular make clear how boroughs will be enabled and supported in making good their responsibilities towards enabling a large-scale shift to cycling.

In conclusion LCC underscores our support for the compelling vision for transport in London that the MTS describes and the Mayor and TfL's willingness to innovate, engage and take tough decisions to achieve it. **LCC stands ready to vigorously support the Mayor in expediting the delivery of the cycling commitments he has made for this term of office, to ensure their realisation occurs at the pace and level of quality required.**

*The remainder of this response includes both introductory remarks and sequential answers to the questions posed in the MTS. Where relevant we extend our comments to include issues that are not fully covered in the MTS.*

## 1. Introduction

As an organisation that has, from its outset, championed sustainable transport, LCC strongly supports the principles underlying the MTS namely:

*“The success of London’s future transport system relies upon reducing Londoners’ dependency on cars in favour of increased walking, cycling and public transport use” MTS page 17.*

We share the view that a shift away from the car will help improve air quality, encourage active travel and reduce road danger. The Mayor’s target of 80% of journeys to be made by walking, cycling or public transport by 2041 is an essential element of keeping London liveable as its population grows. Because the Mayor’s main levers of power centre on transport, it follows that an effective MTS will be crucial in ensuring that the new London Plan delivers the city for all Londoners to which the Mayor rightly aspires.

We strongly support the aim of eliminating all serious injuries on our roads. Fear of road danger is a primary reason for Londoners not to cycle or to limit their children’s walking and cycling. The principle of targeting road danger “at its source by ensuring the street environment incorporates safe speeds, safe people, safe street design and safe vehicles” (MTS p 62), and often described as a “systems” approach, is one that is recommended by the World Health Organisation, as well as the Department for Transport, and which has been successfully implemented in countries like Sweden and the Netherlands.

While LCC welcomes the Mayor’s vision, we think the MTS will be significantly strengthened by addressing the lack of interim targets across much of the document and by clarifying the quality standards that are to be required in the Healthy Streets and cycling programmes.

We note that where targets are set, for example in the Vision Zero chapter, these will require a range of other measures and targets to be in place before they are achieved. To cite a key example from the cycling field: the Mayor has already made a public commitment (to LCC) to triple the amount of protected cycle track during his first term and allocated the financial resources to achieve this. Meeting this target, which is not referenced in the draft MTS, will both help the long term target of a modal switch from car use (from 34% to 20% by 2041) and help reduce cycling collisions.

Similarly the Mayor’s stated aim to reduce health inequality and improve children’s health through more safe spaces and safe walking and cycling routes to school will not be achieved without delivering a specified and defined safe routes programme.

We note that existing targets, such as the reduced target of 1.5 million cycling journeys per day<sup>1</sup> by 2026 are not referred to in the MTS, and nor are relevant documents such as the London Cycle Design Standards 2014.

Clarity on interim targets and quality standards will assist boroughs, developers and businesses with planning both in the short and long term. Workplaces and schools in the vicinity of protected cycle routes will, for example, need provide greater amounts of cycle storage facilities as well as reviewing their travel plans.

**The MTS must include interim targets across the entire document with clear pathways outlined for reaching both such interim targets and the 2041 aspirations.**

## 2. Making London a City for All Londoners: the Critical Role of Cycling

The London Cycling Campaign believes that unlocking the huge potential for cycling and walking as a means of everyday (particularly local) travel will be critical to achieving the goal of a safer, cleaner, healthier and more prosperous city.

We recognise that policy goals for transport in London have to meet multiple objectives, including:

- Keeping London’s rapidly growing population moving

<sup>1</sup> <https://www.london.gov.uk/press-releases/mayoral/mayor-secures-record-investment-in-cycling>

- Making travelling in London safe and pleasant
- Making London's communities and places better and more attractive locations
- Ensuring affordable and convenient travel options are available to all
- Improving the health of Londoners
- Reducing pollution and carbon emissions
- Servicing London's business needs

As is recognised in the MTS and as LCC has long argued, cycling plays a role in meeting each of these objectives.

We note the role of London's boroughs which, with responsibility for 95% of London's road space, must also play their full part in achieving these objectives.

**The Mayor must ensure that the boroughs are fully supportive of his cycling and walking programmes, notably Healthy Streets and Liveable Neighbourhoods.**

### 3. Making Access to Cycling a Public Health Priority

The problems and costs of inactivity are well documented in TfL's Healthy Streets publications. The benefits of increased walking and cycling are also covered. Those who regularly cycle enjoy a fitness level of someone 5 to 10 years younger according to a large study in Birmingham<sup>2</sup>. A more recent study in the BMJ estimates that cycle commuters have a 40% lower risk in all-cause mortality<sup>3</sup>.

Health inequalities disadvantage poorer Londoners whose life expectancies are consequently lower. People on lower incomes are less likely to own cars and may have limited funds to spend on public transport – until cycling infrastructure is improved they also do not feel able to cycle.

Surveys for TfL consistently show that a quarter or more of Londoners would like to cycle or cycle more. In some boroughs the proportion of people cycling to work, as a main mode, already exceeds 14% (Hackney).

We welcome the MTS advice to Boroughs to develop Liveable Neighbourhoods that encourage people to walk or cycle in their locality. To gain modal share, cycling and walking must be made easy, convenient and safe.

## 4. Chapter One: the Challenge

### Question 1

As noted above, we share the view that *"London's streets should be for active travel and social interaction but too often they are places for cars not people"* (MTS page 10). We agree that we need attractive alternatives that will enable more Londoners to reduce their dependency on cars and that road danger must be reduced.

### Road pricing

The successful adoption of dynamic road pricing is not mentioned among the challenges in Chapter 1. Given the capital's population growth and limited road space there is no alternative to a wider and smarter road pricing system than the current Congestion Charge Zone (CCZ). Even if the Mayor's first term commitments do not include road pricing, the process of technology selection and forward planning is a challenge that must be explicit in the MTS and not simply *'give consideration to'* as in proposal 19.

### Child inactivity

A challenge that is not recognised in the opening chapter and only mentioned briefly in the rest of the document is the inactivity that threatens the health of London's children. Given the long term perspective of

<sup>2</sup>Tuxworth, W., Nevill, A. White, C. and Jenkins, C. (1986). Health, fitness, physical activity and morbidity of middle-aged factory workers, British Journal of Industrial Medicine, 43, pp 733-75

<sup>3</sup><http://www.bmj.com/content/357/bmj.j1456>

the MTS, specific consideration must be given to actions and measures that would significantly reduce the use of motor vehicles for the school run (we provide further comment below) and encourage walking and cycling to school.

## 5. Chapter Two: The Vision

### *Question 2*

We strongly support the vision of reduced car dependency and a target of 80% of journeys to be made on foot, cycle or public transport. While the long term target is welcome, the Mayor must provide interim targets for sustainable modes to enable boroughs, developers and businesses to plan ahead.

The last London Plan included a 5% modal share target for cycling by 2026. This was subsequently reduced by TfL to a 1.5 million daily journey target (which equates to 5% at present but will not equate to 5% in 2030 when the population is larger). While such a reduced target may be easier to achieve, it will not meet the transport needs of the increased population.

**The 5% cycling mode share target must be reinstated and a longer term target of 10% adopted. By 2050 London should have the highest cycling modal share of any European “mega city”.**

Given that more than 10% of Londoners already cycle once a week or more this is an achievable target.

We note that the London-wide growth in cycling recorded by TfL (from 300,000 to 670,000 journey stages per day) has not been evenly distributed. In some outer London boroughs in particular the growth has been much lower than in inner London.

**The Mayor must ensure that growth potential of cycling is fully realised across the capital by utilising the Liveable Neighbourhoods programme and developing the cycle network to cover the whole city.**

### *Question 3*

**We strongly support the 2041 targets for active travel, road danger reduction, motor traffic reduction (including freight at peak times), improved accessibility and improved public transport. However, we would like to see interim targets provided and more specifics of the measures and the standards to be followed.**

We note, in particular, that active travel of 20 minutes a day must be facilitated by high grade cycle infrastructure as well as road danger reduction for both walking and cycling. This is particularly relevant in the case of children who are currently not permitted, either by their parents or their school, to walk or cycle to school. We note that the two rare opportunities for children to cycle in safety on London's roads: the London Freecycle and Hackney's Bike around the borough event (capped at a 1000 children), are both exceedingly popular with children and their parents (30% of Freecycle participants surveyed described it as “a day out with the children”).

We strongly support reduced road danger targets and again note the need to implement high quality cycling facilities to achieve this aim.

It is unlikely that traffic volumes will reduce to the target levels unless dynamic road pricing is introduced and new measures to reduce the growth of motor vehicle journeys (including freight, private hire vehicle movements, internet deliveries etc.) are taken.

**Accessibility of the transport system must include accessibility of cycling infrastructure, including both routes and parking, by people with disabilities and this must be recognised in the MTS, as it already is in the London Cycle Design Standards (LCDS) 2014.**

## 6. Chapter Three: Healthy Streets and Healthy People

We begin by making recommendations in response to this chapter as a whole, then respond to selected individual proposals.

### Mobility as a new conceptual framework

There is a growing realisation that it is time to think less about individual modes of transport per se, and focus instead on providing solutions for Londoners which facilitate safer, more affordable, cleaner, more convenient door-to-door movement of people and goods. Moreover, Transport for London is likely to be at the heart of this: TfL has long played the role of provider of integrated bus, tube, train, and more recently boat and cycle services; it now has the additional role of promoting “Healthy Streets”, at the centre of which is promoting walking, cycling and cleaner bus journeys, and reducing private motor traffic and air pollution.

**TfL is uniquely well-placed to take on the responsibility to ensure Londoner’s door-to-door mobility needs are met and to harness the potential of new technologies and new private sector providers to do so in an efficient, socially-equitable and environmentally sustainable way.**

No-one can accurately predict the future effect of disruptive technologies; but we can describe what the long term future of efficient, environmentally and socially-equitable mobility should look like in general terms, particularly regarding surface transport:

- Walking and cycling will be the principle mode for local and first/last stage journeys
- Car ownership will be replaced by convenient and affordable access to (on demand) vehicles, e.g. via car clubs
- Dynamic road pricing and reallocation of road space and priority to cycling and clean buses will keep traffic flowing
- Owned and hired e-cycles will hugely extend the range and diversity of cycleable journeys
- e-cargo bikes will dominate last mile deliveries within a consolidated freight system
- Planning, booking, and payments for multi-modal journeys will be made straightforward via consumers’ smartphones, as will access to real-time data on current usage levels and pricing

**While the Mayor’s new Transport Strategy sets out his vision for the long term future of mobility it does not describe his pathway for achieving it nor provide interim targets.**

### Maintaining the momentum of cycling programmes

LCC’s *Love London Go Dutch* campaign was instrumental in winning, and then defending, a new approach to cycling safety from the last mayor, based on continental approaches; we recognise and welcome the fact that the current Mayor has made very important commitments to build and expand on that. This includes promising to meet the terms of LCC’s 2016 Sign for Cycling campaign:

- Tripling the extent of protected space for cycling and completing the current Better Junctions programme
- Enabling every borough to access funding for a major walking and cycling scheme
- Taking the necessary steps towards making Direct Vision lorries the standard type on London’s streets

We also recognise further steps the Mayor has already taken:

- Appointing London’s first, full time Walking & Cycling Commissioner
- Creating a new £2.1 billion Healthy Streets programme (over five years)
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It is obvious to say, but important to stress, that we are already a long way into the Mayor’s first term in office. The extent of effort required in the last 2-3 years of the previous Mayor’s term of office to initiate the three

Mini-Holland schemes and the new East-West and North-South Cycle Superhighways illustrates that work on the cycling element of the MTS must be accelerated.

**A requirement to meet the Mayor's commitment to triple the extent of protected space for cycling in his first term must be incorporated in the MTS. If the cycling element of the MTS is to be a success then cross-organisational leadership, drive and capacity must be maintained within TfL to recapture the rate of delivery seen at the peak of the last mayoral programme and ensure the cycling budget is fully and effectively spent.**

## **We need a strategic cycle network**

We share the view expressed in MTS that:

*"London needs a strategic cycle network across the whole city because making cycling attractive is dependent upon making it easy to do wherever people live, and wherever they are travelling to"* MTS page 40.

One of the key measures for success in the medium-long term will be the creation of a network of direct and high-quality cycle routes across London. In particular these must connect residential area with transport hubs, shopping and employment districts and other centres of activity and amenity along key desire lines.

**The creation of a dense, high quality network has been fundamental to the success that the Netherlands and other countries and cities have had in achieving mass levels of cycling. The same must be done in London.**

We share the view that every (Proposal 3 aspires to 70% by 2041) Londoner should have access to a high quality cycle route within 400 metres of their home.

Progress towards this goal has been hampered by concerted attacks on some routes by a variety of interests ranged against improvements in road conditions. If the Mayor wants to achieve mass levels of cycling, it's vital that London deals more effectively with "bikelash" going forward.

The keys to this are:

- A robust evidence base that is communicated clearly from the outset – including pre-scheme measurement, post-scheme auditing and better use of data to identify schemes, locate them and justify them clearly to residents and other stakeholders.
- The use of approaches such as "Healthy Streets" to engage with and provide benefits for the widest possible range of Londoners
- A high, minimum quality threshold for TfL funding of borough level schemes (based on LCDS and the Cycling Level of Service (CLoS) measure)
- Clearer communication with boroughs so that the necessary skills are in place and that schemes are appropriately resourced, politically championed and form part of an holistic transport strategy.

**Mayor should rapidly establish a unit for cycling best practice at TfL. This will bring together the collective experience and skills of cycling experts within TfL, the boroughs, NGOs and elsewhere to mentor and provide support and critical oversight on major schemes. This should extend beyond current infrastructure round tables to draw in engagement, communication, political and other skills from a broad range of experts.**

Mass cycle use will only arise through prioritising cycling in space and time, entailing hard choices. It will require bold, unambiguous and persuasive communication by the Mayor to bring public opinion behind this.

## **Prioritising key routes**

TfL has created a "Strategic Cycling Analysis" map using data collated from London Travel Demand Surveys, the Census and other sources. As stated above, we view the fulfilment of the promise of this map as vital to enabling cycling to grow rapidly towards a mainstream transport mode.



The cycle network must provide direct, convenient routes along desire lines and must be of high-quality without breaks or weak links in order to enable mass cycling (see below). The Mayor has repeatedly promised to make the “hard choices” on road space allocation. The time has come to put that promise into action.

LCC requires schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.

As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in a neighbourhood. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, and transport hubs considered from the outset.

Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which promote cycling meet TfL’s “Healthy Streets” checklist. A healthy street is one where people choose to cycle.

LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all “Critical Fails” eliminated.

Only 3% of TfL’s core cycle network features tracks. The proportion of cycle tracks across London’s road network as a whole is exceptionally small . . . Unless there is significant reallocation of road space towards cycling, walking and buses - throughout London - then motor vehicles will continue to dominate the city, and opportunities to enable many more people to cycle and walk will be missed.

We suggest the Mayor concentrates both on creating routes that either are already heavily cycled (>1,000 cycle movements a day, for instance) and/or where TfL’s data demonstrates highest latent demand for a route.

The creation of a network that will, by its nature, cross borough lines and switch between borough and TfL-controlled roads means developing a set of tools to ensure consistency of approach, ensuring boroughs improve their approach and expertise to truly embrace cycling and walking, and setting a quality bar for funding.

We note that the detailed version (published by TfL on-line) of the Strategic Routes map on pages 52-53 of MTS does not prioritise for action existing but low-grade cycle infrastructure such as CS7. This must be addressed in a revised edition. We note that very high numbers of cyclists use some low-grade routes and their safety must not be ignored.

**LCC recommends a minimum score of 70% on TfL’s Healthy Streets Check, with no “critical issues” as a condition for highways schemes to access TfL funding. The Strategic Cycling Analysis priority list must take into consideration existing cycle routes that have low-grade infrastructure.**

## Providing Protected Space for cycling

We note that, with the exception of the illustration on pages 54-55, protected space for cycling is not highlighted in the MTS.

Fear of death or injury is the main barrier to more people cycling, or cycling more. The Mayor must therefore not just focus on reducing road danger, but on enhancing the subjective experience of cycling. This can only be done by substantially taming and/or reducing interactions between motor vehicles and cycling.

LCC advocates an approach to reducing danger based on the copious experience of the Dutch, and therefore based on the principles in their “CROW” manual. TfL’s LCDS and CLOS assessment already features standards for “protected space” similar to those recommended in CROW and advocated by LCC.

**Motor vehicles and cycles should be physically separated on all streets with more than 2,000 PCUs (passenger car units) of motor vehicle movements daily, and/or where speeds are above 20mph (including bus lanes)**

We note that the most recent DfT guidance on cycle infrastructure provides a lower maximum level for motor traffic before protected space for cycling must be provided (5,000 vehicles per day [VPD]) than the 2014 edition of the London Cycle Design Standards (LCDS) which sets the “critical issue” mark at 1,000 vehicles per hour (equivalent to 10,000 Vehicles Per Day/VPD).

**The 5,000 VPD maximum for roads without protected space for cycling must be introduced to the online edition of LCDS, and we advocate the Dutch standard of 2,000 PCUs per day on major cycle routes. Boroughs must be advised that all traffic schemes must meet the LCDS 2014 (and subsequent revisions) standards.**

High motor traffic levels are likely to occur most frequently on main roads and major routes, but many cycling journeys will involve use of local roads. In such situations, e.g. residential areas, the necessary levels of cycling safety will be achieved by addressing the volumes and speeds of motor traffic itself – elimination of through-traffic being a key tool in improving conditions.

We note and welcome the principle in Proposal 8:

*“to promote one-off, regular and trial closures of streets to some or all motorised traffic so that Londoners can see their streets differently”* MTS page 58

Through traffic invariably blights neighbourhoods and creates a hazard for those walking and cycling. Where such traffic has been eliminated such as in parts of Waltham Forest, Hackney and Ealing, there is clear evidence that residents appreciate changes.

**Traffic speed and volume reductions must be applied to residential areas to create “cells” of low motor traffic neighbourhoods. An ambitious target must be set for the proportion of London’s neighbourhoods to benefit in this way as part of Liveable Neighbourhoods and other initiatives.**

Low-traffic neighbourhoods have advantages beyond making cycling safer: there is evidence they reduce motor vehicle traffic overall without overly congesting main roads, increase walking and, importantly, increase community interaction and cohesion as well. Proactive action to reduce traffic is also needed to combat the rise of “rat running” facilitated by a new generation of wayfinding apps and potentially the development of “autonomous” vehicles.

## Safe junctions

As well as separating those cycling from motor vehicles on main roads, it is vital the role of junctions is considered too: most collisions happen at or near a junction. Every junction on every key cycling route must be made safer and to feel safer. This requires the separation of cycling movements from conflicting motor traffic turning movements in time and/or space.

High-quality junction design, matching that in the Netherlands, remains rare in London. Too many junctions retain lower-quality approaches and designed-in risks – with the result being both fatalities and injuries for those cycling, and junctions that remain a significant barrier to most people cycling.

LCC supports British Cycling’s “Turning the Corner” approach and other efforts to persuade the DfT to permit innovation and change to occur. We want to see the best in European junction design to be adapted for British streets, which will require the DfT to allow more innovative approaches to be trialled and for changes in UK law to be championed. These changes would enable junction designs that would benefit everyone – making simpler, safer junction designs available in a far wider range of locations, and potentially cutting congestion too, as well as allowing for innovative designs such as “all green scramble” junctions to be tested in the UK.

**The Mayor must seek out, embrace and champion innovative ways forward on junction design and lobby Parliament, the Government and DfT to adopt British Cycling’s “Turning the Corner” recommendations and to allow trials of innovative designs, adapted from European approaches, to move forward.**

The Mayor has already pledged to finish the TfL “Better Junctions” programme in one term. This should be done with clear safety thresholds in place.

**Junction redesigns should achieve a minimum TfL Cycling Level of Service Junction Assessment Tool score of 70% with no “critical issues” and/or the equivalent in TfL’s Healthy Streets Check when fully implemented.**

The “Better Junctions” programme must continue to identify junctions by the risk they pose to vulnerable road users, adding further junctions to the programme progressively.

### **The Healthy Streets approach: illustration on pages 54 and 55 of MTS**

We note and welcome the list and illustration of 16 elements of a ‘Healthy Street.’ This is one of few references to:

- ‘protected space’ for cycling,
- use of filters to retain cycle access to streets, and
- ensuring that access to cycle routes is provided for people with disabilities.

The status of the guidance on these pages is not provided. Boroughs must be made aware that Healthy Street schemes that do not adopt the illustrated measures where relevant will not be funded.

**MTS must provide explicit guidance to TfL and the boroughs that the street design elements illustrated on pages 54-55 are to be adopted in all relevant traffic and public space schemes.**

## **Walking and cycling environment: policy 1 and proposals 1 – 8**

### **Question 4**

We strongly support the MTS principles quoted below which we believe are essential for the capital’s future health and prosperity:

*“a) Enabling active, inclusive and safe travel, by providing accessible, well-designed space for walking and cycling, the healthiest means of moving around London’s streets.*

*b) Using street space more efficiently – reducing traffic levels through better managed freight and fewer private car trips.*

*c) Improving air quality and the environment, and ensuring London’s transport system is resilient to the impacts of severe weather and climate change” MTS page 39*

**As noted above, we would like to see interim targets and programme pathways identified for the measures proposed in this chapter. Policy 1 and proposals 1-8 only include one target date: 2041. LCC shares the view that all Londoners should have the opportunity to do at least 20 minutes of active travel per day (Policy 1) and that all Londoners (rather than just 70%) should have access to a high-quality cycle route within 400 metres (Proposal3) of their home, but we need a defined pathway to achieve both long term targets and interim targets that the Mayor, TfL and boroughs can work towards.**

We strongly support the principle in Policy 4

*“The Mayor, through TfL and the boroughs, will prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic” MTS page 71.*

## Cycling and walking to school or college: proposal 7

We strongly agree with proposal 7 but want to see it strengthened through concrete proposals and reference made to quality standards.

*“The Mayor, through TfL and the boroughs, will work with schools, employers and community and user groups to promote walking and cycling, whether for the whole journey or part of the journey”* MTS page 58 (our underlining)

This quote is from the Mayor’s draft Health Inequalities Strategy

*“Through the London Plan, the Mayor wants to ensure that London’s schools are healthy places for all children and young people to learn, in terms of their design and location. For example, entrances to new schools will be safer and healthier if they are located away from busy roads and have traffic calming in place. He also wants safe walking and cycling routes to school. This will encourage children to be more physically active and reduce their exposure to poor air quality.”* page 40

As TfL notes, child obesity is high and rising. While cycling levels have more than doubled in London over the past 13 years (from less than 300,000 trips per day to more than 670,000) this is not the case with children cycling to school. Cycling to school has remained low at less than 2% of journeys despite the provision of Bikeability cycle training in a large proportion of London schools. Fear of death or injury is the key barrier deterring parents, and school authorities, from permitting children to cycle to school, as they do in Holland<sup>4</sup>. The consequence is that a significant proportion of traffic congestion in the mornings is attributable to the school run.

Thus one of the key wins for the Mayor on Liveable Neighbourhoods should be changing the “school (car) run” to an active travel opportunity. In Holland more than 40% of school journeys are by bicycle; as noted above, in London it is less than 2%. The Government has stated that one fifth of peak traffic is from the school run. This contributes to London’s illegal air pollution and its irreversible, lifelong health impacts on children – 360 primary schools in London are in air pollution hotspots.

**The MTS must place cycling to school at the heart of the Liveable Neighbourhoods programme. The MTS must specify the use of quality standards such as the London Cycle Design Standards 2014 (and subsequent revisions) in designing Liveable Neighbourhood schemes.**

More generally, boroughs must be directed to review the travel plans for all schools with the intention of resolving any barriers to active travel. It is often the case that low cost measures can facilitate a large number of active journeys, such as using retractable, or folding, bollards to restrict motor traffic near schools during peak times (e.g. Camden’s “School Streets” programme).

**Provision of sufficient safe cycle parking for staff and pupils at all schools, alongside travel plans that encourage walking and cycling, is essential.**

## Public sector active travel: proposal 7

We re-state Proposal 7 with a different emphasis:

*“The Mayor, through TfL and the boroughs, will work with schools, employers and community and user groups to promote walking and cycling, whether for the whole journey or part of the journey”* MTS page 58 (our underlining)

<sup>4</sup>Nearly half of children surveyed by Sustrans in 2010 wanted to cycle to school but only 4% were allowed to. The biggest concern of adults when it comes to children walking and cycling to school is traffic danger. <https://www.sustrans.org.uk/what-you-can-do/children-and-families/school-run-cycling-and-walking-school>

It is often forgotten that in some boroughs the public sector (including the NHS) can account for a quarter of employment. Boroughs, TfL and the NHS must be encouraged to lead by example in facilitating and encouraging active travel by staff, and visitors, to their sites. It is notable that case studies of good provision of secure cycle parking, safe routes, lockers, washing facilities etc. are invariably drawn from the private sector.

**The MTS should encourage the promotion of cycling to public sector workers and service users, particularly in the local authority and health sectors, supporting a number of exemplar initiatives.**

It sends confusing messages for so many public health sites to have so little public cycle parking and so much car parking. The Mayor must work with Primary Care Trusts, the NHS and other stakeholders to encourage hospitals, GP surgeries and other health centres to embrace the Healthy Streets programme, create healthier places and communicate to users the benefits of activity, cycling and walking from a health perspective. Improved access to health sector sites by public transport, walking and cycling must be prioritised.

### **Cycle hire: proposal 6**

We share the view that cycle hire (whether docked or dockless) must be integrated into London's public transport system.

This requires increased integration of cycle hire with other modes, allowing for both cycle hire to be incorporated into season tickets, and to update the TfL journey planner so that bike-stages or interchanges can be shown as part of a multi-stage journey.

**Cycle hire must be integrated into public transport provision. The Mayor and boroughs must ensure that any new cycle hire systems do not undermine the level of provision of cycle parking for personal cycle use.**

## **Reducing road danger: policy 2 and proposals 9 – 11**

### **Question 5**

We strongly agree with the target of eliminating all deaths and serious injuries on the roads by 2041 (Policy 2) and the principles behind Vision Zero. We also strongly support the principles in Proposals 9 – 10 but want to see them strengthened through the addition of clear pathways to achieving the targets on page 62, including an added target for cycling (see below).

Fear of road danger is a primary reason for Londoners not to cycle or to limit their children's walking and cycling. The principle of targeting road danger *"at its source by ensuring the street environment incorporates safe speeds, safe people, safe street design and safe vehicles"* (MTS p62), and often described as a 'safe system' approach, is one that is recommended by the World Health Organisation, as well as the Department for Transport, and which has been successfully implemented in countries like Sweden and the Netherlands.

While such approaches have been adopted in some boroughs, notably Road Danger Reduction in Lambeth, the policy is far from common across London. Boroughs must be advised of the advantages of adopting Vision Zero and the potential gains in terms of reduced collisions.

**We support the targets for road death reductions on p62 but want to see specific, interim targets for reducing rates (per kilometre travelled) of fatalities and serious injuries for people cycling leading to 2041.**

### **Safer lorries and buses: proposal 9c**

Given the forecast increase in London's population and the planned, and essential, increases in cycling and walking, interaction between HGVs and vulnerable road users will grow and must be made as safe as possible. Some fifty percent of all cycling fatalities involve collisions with lorries, despite the fact that lorries account for

less than 5% of road miles in the capital; lorries also account for a disproportionate number of pedestrian deaths and serious injuries.

The new MTS must incorporate the full-scale adoption of new safer lorry designs that the Mayor has committed to making the norm on London streets. This programme ties closely into the Mayor's commitment to a Vision Zero approach to road danger reduction.

The TfL definition of a new (star rated) "Direct Vision" standard for HGVs needs to become part of every operator's and developer's assessment of their Work Related Road Risk(WRRR) programme.

We note that the best practice safety standards for the freight and construction industries (FORS -the Fleet Operators Recognition Scheme and CLOCS – the Construction Logistics and Community Safety standard) are not mentioned in the MTS. Both these industry led standards contribute to safety on our roads and have been adopted and implemented by a large number of companies and organisations. Nonetheless borough uptake of CLOCS remains slow and must be accelerated.

**MTS must make reference to both FORS and CLOCS. Boroughs must be advised that all developments must meet Work Related Road Risk (WRRR) standards set through the Construction Logistics and Community Safety (CLOCS) industry-led organisation and that all contracts, as a minimum, must match the lorry star rating standard set for TfL contracts.**

We share the view zero-rated lorries must not be used on urban streets after 2020, but we believe the Mayor's ambition for 2024 must be greater:

**For all GLA family contracts, the minimum Direct Vision standard to be specified by 2020 should be five stars.**

More lorry-cyclist collisions occur during the morning peak than at any other time. Lorry movements also contribute to congestion. Limiting lorry movements at peak times would minimise conflict between vulnerable road users help reduce congestion. Boroughs must be encouraged to promote "early doors" schemes, such as those in Southwark, enabling vehicles to arrive early and wait in holding areas by agreement with residents.

**The Mayor must work with industry to reorganise lorry movements to reduce the numbers of lorries on the roads at peak times, particularly in areas with high cycling and/or pedestrian flows.**

We welcome Proposal (9c) to develop a new safety standard for buses. In addition to design and technology measures, the standard should include driver training comparable to Safer Urban Driving for the HGV sector.

We note that buses can set the standard for other road users, whether it's observing speed limits or ASL bike boxes. ISA (intelligent speed adaptation) and video cameras are useful tools to achieve this. The successful CLOCS scheme for HGVs needs to be adapted for the bus and coach sector. We note and support the use of ISA and automatic braking systems on buses

**A Certificate of Professional Competence (CPC) training module similar to Safer Urban Driving (SUD) must become the norm for bus drivers. Intelligent Speed Adaptation(ISA) systems must become standard on London buses. An adapted version of the CLOCS standard must be made available for the bus sector**

## **Policing and road traffic crime**

We note that the MTS only makes a brief reference to enforcement and policing. LCC and other organisations made the following recommendations to the London Assembly enquiry on road traffic crime. This is a summary of proposals – for full details please see the LCC et al response to the enquiry.

1. **Treat road crime as crime and include in crime statistics.**
2. **Adopt a harm reduction approach** with the focus on reducing danger posed to vulnerable road users (pedestrians, cyclists and powered two-wheelers).

3. **Produce annual reviews.** Total traffic law enforcement efforts (court prosecutions, Fixed Penalty Notices (FPNs), National Driver Offender Retraining Scheme (NDORS), identification of hit and run offenders) should be reported by borough.
4. **Commission research into:**
  - a. The effectiveness of traffic law enforcement,
  - b. Hit and run (failing to stop/report) collisions,
  - c. Outliers among boroughs in the collision data.
5. **Speeding.** Making use of robust data, set out a strategy of enforcement that makes use of speed cameras, police enforcement, engineering changes and community road watch to move towards compliance with speed limits across London.
6. **Driving offence review.** Request that the Government includes the definitions and charging standards, as well as the sentences, for bad driving offences in its review of road traffic offences and penalties.
7. **Increase transparency and accountability of the police in collision investigation.** This should include the outcome of collision investigations.
8. **Conduct surveys on the level of confidence for road crash victims.**
9. **Establish a working group** with police, victims and campaigners, to promote community confidence in the police and wider justice system.
10. **Ensure road crash victims are treated as victims of crime,** unless the contrary is proven.
11. **Include victims of road traffic crime in victims of crime statistics.**

### **Motorcycle safety: Proposal 11**

While we welcome measures to improve motorcyclist safety, we disagree with proposal 11c which recommends motorcycle access to all borough bus lanes to avoid 'confusion'.

In the absence of a comprehensive and safe cycle network in London, bus lanes provide a refuge for cycling from busier and higher-risk, mixed motor traffic lanes. Some, such as those on bridges and popular cycle routes (e.g. Kennington Park Road, Holloway Road and CS7) are used by very high numbers of cyclists at peak times.

Use of shared bus lanes by motorcyclists, sometimes at speeds exceeding the speed limit, as well as taxis, can intimidate cycle users. Access to bus lanes enables motorcyclists to travel at higher speeds and, if implemented on borough roads which attract high cycling volumes, could prove a deterrent to cycling growth.

Increasing access to bus lanes for both motorcycles and taxis will mean far more bus lanes will exceed the 2,000 PCU limit LCC sets before requiring physically separate cycling tracks and will therefore reduce the safety and comfort of using bus lanes for cycling.

**We disagree with Proposal 11c and suggest retaining bus lanes for buses and cycles only unless the road has protected cycle lanes or tracks.**

### **Improving personal safety: policy 3 and proposals 12 -14**

#### **Question 6**

We agree that crime and fear of crime in London must be reduced.

We note that this section of MTS does not mention cycle theft although it does refer to motorcycle theft.

#### **Cycle theft**

Four out of ten people say the prospect of cycle theft discourages them from cycling. The hard work and cost involved in encouraging cycling is quickly undone when an owner's cycle is stolen. Around a quarter of people stop cycling after a theft. This contributes to "churn" in cycling (the TfL attitudes to cycling survey notes that 30% of riders in any given year are new to cycling and that 7% of existing cyclists "lapse" each year).

The Police are reporting a sharp growth in cycle theft and we understand the Police Cycle Task Force, once 30 strong, has been effectively disbanded. This may lead to higher levels of theft.

Police campaigns to tackle theft have resulted in year on year decreases of up to ten percent. Programmes such as cycle marking and registration can help make cycles more traceable and investigation of online stolen cycle sales can deter the use of websites such as Gumtree to sell stolen goods. New cycle users must be made aware of quality locks and locking techniques.

**The Mayor's new Transport Strategy must renew the guidance to borough Safer Neighbourhood police teams to address the problem of cycle theft and restore the Police Cycle Task Force.**

## **Personal safety**

As noted in previous Mayoral and TfL documents, personal safety must be a consideration in cycle route design with 24 hour access, including sufficient lighting being provided (other than in exceptional circumstances). We note and commend the previous Mayor's intervention to prevent the entire northern part of the Olympic Park, and its many walking and cycling routes, being closed to pedestrians and cycling in the evenings and at night.

## **Counter-terrorism: proposal 14**

It is vital that London's transport infrastructure is designed with counter-terrorism objectives in mind. But it's also vitally important that this approach does not negatively affect active travel modes or reduce the opportunities to improve matters for active travel modes – as has happened with recent responses to attacks on London's river bridges.

The Mayor must ensure responses to terrorism concerns are in proportion to the broadest understanding of "risk" and balance all concerns effectively. As an example, the current barriers on the bridges across the Thames discourage active travel and worsen collision risks for thousands who already cycle across these bridges daily, yet are likely to protect a very small number of Londoners from harm – there must, longer term, be a more balanced approach that ensures counter-terrorism concerns are effectively answered while improving conditions for those walking and cycling on the bridge, if necessary at some expense to those driving private motor vehicles.

We note that many of the counter-terrorism measures in place were installed on an emergency basis and have not been designed with consideration for cycle users. Just as the Mayor requires all traffic schemes to take account of walkers and people who cycle, so counter-terrorism infrastructure must be developed with all road users in mind. Terrorism must not be allowed to determine the transport choices of Londoners.

## **Making more efficient use of the street network: policy 4 and proposals 15 -17**

### **Question 7**

We strongly support Policy 4 to prioritise space efficient modes of transport. It is worth noting that cycles not only occupy less space on congested roads but are also more efficient to store. As noted in the table below – vehicles moving at speed occupy more space because of the 'shy space' – the buffer zone to other objects.

The MTS notes that cars, taxis and PHVs take up half the street space in London but account for just 13 percent of the distance travelled (MTS page 75).

We share the view that the growing freight sector in particular must be addressed and we welcome the seven measures in Proposal 15 while noting, as previously, that no targets or pathways for achieving these useful aims are provided.

We note that some companies, such as John Lewis, have already restricted personal deliveries to the workplace and it would be welcome if the entire, large, public sector were to follow this example. This would likely encourage extension of the network of collection points that could be accessed by all members of the public.



**Table 1**Typical Travel Space Requirements (Square Feet)

	Speed (mph)	Standing/Parked (square feet)	Travelling (square feet)
Pedestrian	3	5	20
Bicycle	10	20	50
Bus Passenger	30	20	75
Automobile	30	400	1,500
Automobile	60	400	5,000

*This table compares typical space requirements for different modes of travel.*

From Land Use Evaluation, TDM Encyclopedia <https://www.vtpi.org/tdm/tdm104.htm>

**The MTS must direct all Boroughs to set an example in reducing freight deliveries by restricting personal deliveries to the workplace and encourage the multiplication of local pick-up points.**

## Use of cycles for local deliveries

We note that while the MTS illustrates a delivery cycle and mentions the use of cargo bikes it does not include cargo bikes in the text of this chapter.

**The potential contribution of cycle freight and ebike cargo deliveries must be recognised in the MTS and included in proposals for last mile journeys. Potential pick up points for personal deliveries of online purchases, such as stations, shops and other locations must be provided with (reserved) short-term cycle parking near the collection point or access to the collection area.**

## eBikes

We note that the MTS makes little mention of ebikes. This segment of the cycle trade already dominates cycle sales in the Netherlands in terms of value and is of increasing importance in the UK.

The use of ebikes for delivery of heavier goods is a way of eliminating air pollution and also a way of reducing congestion caused by large vans both in movement and when double-parked in narrower roads.

eBikes are also an important way of enlarging the number of people who can travel by bike, notably those who find it difficult to pedal a conventional cycle. We note that in Holland ebikes are seen as a solution to suburban traffic congestion and wider cycle tracks have been introduced to enable ebike use on longer journeys.

In the Netherlands, it is already recognised that ebikes are invariably heavier than conventional cycles and are, on average, significantly more expensive. This requires level access to cycle parking and improved security (we note that this issue is highlighted in the section of the MTS on motorcycle parking).

**The MTS must specify the promotion of cargo bikes and ebikes for local deliveries. It must consider the infrastructure requirements for ebikes which are generally heavier and will require level access (especially if they are used by people with disabilities) and secure storage. Longer term it must also plan for long distance cycle routes from Outer London that could take advantage of improved ebike technology.**

## Car clubs

We support proposal 17 and suggest that car club bays could be integrated with cycle parking stand locations.

## **Congestion and road pricing: proposals 18-19**

### **Question 8**

We are concerned that this major element of London's future transport strategy does not have a clear pathway and timetable for assessment and delivery. While road pricing may be politically challenging, its development in London is an essential element of sustaining "good" growth.

Cycling is a success story. More than 670,000 journeys are now made daily by cycle – some 400,000 more than in 2001. The growth was triggered by congestion charging, and it has helped contain congestion as the population increases and the number of people working in and passing through central London increases. However, overall congestion levels are climbing, including from the rising number of private hire vehicles and light freight vehicles on the road. At the same time, road usage patterns are changing – with a rise in internet deliveries to workplaces, for instance, fuelled in part by a lack of control on use of delivery vans throughout London at any time of day. The notable case of Bond Street, where several dozen firms provided separate business waste collections until collective action to reduce them was taken, is an example that needs to be learned across the capital.

Since the original Congestion Charge Zone was introduced, more sophisticated charging systems have been developed with the option to charge by distance, time and individual vehicle. Several cities outside the UK have now introduced charging systems of various types.

We note that the MTS Proposal 19 refers to giving "consideration to the development of the next generation of road user charging systems." There is a danger that fear of political unpopularity could delay progress towards an efficient and effective road pricing model. This will have negative repercussions on congestion, air quality and health – all matters that are highlighted as priorities in MTS.

**The Mayor must create a clear pathway to using dynamic road charging across Greater London to reduce congestion, using the proceeds to invest in walking, cycling and public transport.**

## **Localised traffic reduction strategies: proposals 20-21**

### **Question 9**

We strongly support localised traffic reduction, including demand management. We particularly welcome promotion of alternatives to car travel (p 85) whether for personal or freight transport (see above).

The use of a workplace parking levy has proved effective in Nottingham and must be encouraged in London. While fewer companies than before offer employees free car parking spaces and fewer employees chose to use such spaces, we note that this has been identified as a staff benefit that is not currently taxable.

The growth in LGV traffic has been highlighted repeatedly by Deputy Mayor Val Shawcross, and reducing unnecessary freight movements is essential to freeing space for cycling and reducing both collisions and fear of collisions. Freight consolidation solutions are now well established, though still rarely implemented.

**The Mayor should work with businesses to exploit to maximum effect opportunities for logistics consolidation and the use of cargo ebikes for last mile deliveries; and encourage business to research and implement further innovations.**

## **Reducing emissions: policies 5 and 6 and proposals 22-40**

### **Question 10**

LCC strongly supports reductions in exhaust emissions and the generation of other pollutants by motor vehicle brakes and tyres. We have supported the Mayor's ULEZ proposals and look forward to their introduction across the whole of London.

Those cycling, like all Londoners, are subject to poor, and illegal, air quality caused by vehicle emissions. We welcome measures to reduce emissions mentioned in Policy 5 such as electrification, road charging, parking charges and levies, and responsible procurement.

London's illegal air pollution levels are causing the equivalent of over 9,000 early deaths per annum and irreversible, lifelong health impacts for thousands of London's children. The Mayor is right to take action to reduce vehicle pollutant emissions.

Around half of the particulate pollution from vehicles comes from sources such as braking debris and road wear, however. Reducing pollution therefore entails reducing the number of vehicles on the road as well as tailpipe measures. We recognise that the latter will incur costs to businesses and consumers; hence proceeds from pollution-charging should be directed towards making it safer to switch to walking and cycling, as well as on enhancing public transport alternatives.

Twenty percent of the UK's carbon emissions are from transport, of which over half comes from cars. At the same time around two thirds of car journeys made by Londoners could be cycled in around 20 minutes. Hence, whilst not overstating the impact of switching away from shorter/low load car journeys to cycling, it is clear that it will bring significant reductions in London's carbon emissions which brings an added imperative to do so.

**MTS must set a robust and ambitious target for a zero emissions, zero carbon transport system. LCC suggests that, subject to the rate of electricity grid decarbonisation, an aspiration to do so earlier than the zero emissions target date of 2050 should be set.**

We note the timeline for improved air quality on pages 94-95 and would like to see a similar timeline for the delivery of the Mayor's cycling programme.

## **Protecting the natural and built environment: policies 7-8 and proposals 41-47**

### **Question 11**

We note that Policy 8 and proposal 44 refer to providing resilience for the transport network in cases of severe weather. This must include cycle infrastructure where adverse weather events, such as ice and snow, can be a significant hazard. In Holland cycle tracks are de-iced as a priority.

**Cycle infrastructure must be included in the MTS section on severe weather contingencies.**

### **Noise reduction**

We note that all cycles whether for personal use, or for freight, or indeed ebikes, are essentially silent.

**Proposal 46 item b) should mention pedal cycles as an example of a silent vehicle.**

## **7. Chapter Four: Public Transport**

### **A good public transport experience**

#### **Question 12**

We strongly support an improved 'whole journey' experience on public transport.

Very poor cycle parking provision at stations in London was ridiculed by former transport minister Lord Adonis. While improvements have been made at some stations, there is still a severe shortage of secure cycle parking at most central stations and a large number of smaller stations. Hazardous cycle access to stations is also a deterrent to people who wish to make use of integrated transport.

In Holland, 40% of trips to stations are made by bicycle. In the UK it is less than 3%. The growth in cycle-rail journeys is stifled by the lack of secure cycle parking at popular destinations: it is a particular deterrent to those who would happily exchange a comparatively lengthy car trip to the station for a journey by ebike.

Where good secure parking is provided (e.g. Paddington), it is rapidly filled. The promise of major cycling hubs at stations like Waterloo must be realised and the Mayor must work with rail companies to achieve this. We note that talks about high grade cycle hubs at central London stations date back more than a decade without yet having been fully realised.

**The MTS should specify that high volume secure cycle hubs will be installed at all major rail stations, in quantities to exceed current demand and meet, as a minimum, the pace of cycling growth. TfL in partnership with Network Rail should assess all rail stations for safe cycle access and provide improved routes as part of the Liveable Neighbourhoods programme.**

## **Mobility for the disabled: policy 12 and proposals 51 -52**

### **Question 14**

We note the attention paid to accessibility to public transport in Proposal 52. The same principles must apply to road schemes.

For some, the bicycle is an essential mobility aid<sup>5</sup> – including those with mental health conditions that deter them from using public transport. LCC has expressed the needs of disabled cyclists in response to previous consultations and is pleased the Mayor has responded positively. Change on the ground however remains rare.

**The Mayor's Transport Strategy must ensure that all infrastructure - whether cycle routes or other facilities such as secure cycle parking - caters for the widest possible range of users, including families, cargo carriers and people with disabilities.**

Boroughs must be advised to require that all developments make provision for “all ages, all abilities” cycling from the outset – including designing all elements of the cycling experience with adapted cycles, cargo bikes, trikes, hand-cycles and so on in mind.

## **Bus network: policy 13 and proposals 53 -54**

### **Question 15**

We note the proposal to make greater provision for bus priority lanes, junctions and signals. Such programmes must not undermine the Mayor's commitment to create a strategic cycle network that enables all Londoner to live within 400 metres of a high quality cycle route. Active travel is both highly efficient in space terms and offers evident benefits in terms of air quality and public health.

**Plans for the transport network must be considered in a holistic way, providing for a mix of sustainable modes, with the strategic cycling network and walking routes given priority along with the bus network. Bus priority measures must not undermine existing and future cycle routes.**

## **Improving rail services: policy 14 and proposals 55-67**

### **Question 16**

We note that the Mayor seeks greater control (through devolution) of the rail and tram network (Proposal 61). If this is granted there will be a need for further integration of transport modes which requires good design of

<sup>5</sup><http://wheelsforwellbeing.org.uk/wp-content/uploads/2017/04/WFWB-Report.pdf>

rolling stock. South West trains, for example, adapted its suburban rolling stock to provide easier access for pedal cycles and a more secure 'flexible space' for storage. This continues to be used to good effect.

**The MTS should specify that devolution of the rail network should be accompanied not only by better integration with London's transport system but also its cycle network including cycle-friendly rolling stock design and provision for cycle carriage, integrated ticketing and sufficient cycle parking.**

## River services and PHVs: policies 15-18 and proposals 68-74

### Question 17

We share the view that the growth in number of private hire vehicles and the mileage covered by circulating vehicles without passengers (whether PHV or taxi) to meet distribution algorithms contributes to congestion and pollution. Constraints on the overall number of PHVs set by the Mayor would help reduce congestion and pollution.

We share the view voiced by part of the pedicab industry that it requires regulation that enables it to continue to offer an affordable service while ensuring the safety and security of passengers.

## 8. Chapter Five: New Homes and Jobs

### 'Good growth': policy 19 and proposals 75 -77

#### Question 18

We share the view that "good growth" must improve the opportunity for people walk and cycle. We agree that *"all new developments should comprise streets and places where people choose to walk and cycle."* MTS page 198

Cycling and walking are the most affordable transport modes. Helping Londoners switch from driving and public transport use to cycling for suitable journeys will save them money, with the proportionate benefit being greatest for those on low incomes. In Holland, cycle use is evenly spread across all income groups and evenly divided between men and women. Making cycling safe and attractive can achieve the same in London.

In this context, "attractiveness" includes better options to securely store cycles – especially true of many of London's Victorian terraces and council estates – and indeed the option to access cycles conveniently and locally on a pay-per-use (or other charging) basis.

We strongly support car free developments and improved provision for walking and cycling ( including both secure cycle parking for occupiers and visitors, and safe and inviting cycle routes) to enable active travel .

We note that adding cycling to the PTAL (Public Transport Access Level) significantly (page 197) enhances the accessibility of developments. What the MTS does not do however, is utilise this data to further model the potential for reduced traffic congestion around any development. The inclusion of such additional information would permit densification of developments that are car-free and easily cycle-accessible.<sup>6</sup>

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<sup>6</sup>CTAL is an innovative means of indicating where and how areas of London would increase their effective PTAL (Public Transport Access Level) value through utilising cycling as a feeder mode. In other words, and as explained in the Strategic Cycling Analysis (p40), the existing PTAL value is calculated by using walking as a feeder mode, and CTAL is the equivalent when utilising cycling as a feeder, or access mode. However, CTAL does not measure the access to cycle infrastructure in an area.

For example, PTAL depends on the distance from a given point to the nearest public transport stop, and service frequency at that stops. An equivalent for cycling would entail measuring the distance from an origin point to an unbroken cycle network meeting a given Cycling Level of Service (CLoS) or Bikeability level.

**The MTS must provide guidance to Boroughs on the use of the enhanced PTAL (with inclusion of cycling) to demonstrate reduced congestion, subject to improved cycle storage and access as well as demonstrating high-quality cycle routes to/from the nearest public transport interchanges, through “Section 106” and Community Infrastructure Levy (CIL) agreements, as grounds for increased densification of development.**

## Cycle parking

Even if cycling is made as safe as possible, London’s chronic lack of secure and convenient cycle parking will continue to impede reaching the daily trip target of 1.5 million journeys by 2024. We note that the previous Mayor set a target of 20,000 new cycle parking spaces in public areas per annum. This rate of delivery has still been insufficient to meet demand at most central locations. We note also that some developments seek to minimise the space allocated to cycle parking by reducing its quality of access in terms of either spacing or location – this can affect people with adaptive or larger cycles in particular.

We share the view (page 199) that the cycle parking standards in the London Plan need to be raised in line with anticipated demand. They also need to be more prescriptive in terms of quality. These standards must include visitor parking, secure parking for residents and/or office premises, and parking for staff and customers of ground-floor businesses, amenities etc.

We also share the view that car-free and car-lite developments are essential to reduce congestion across the capital. Short-term gains for developers from sales of spaces may, in the medium term, help generate unacceptable levels of congestion.

**The London Plan must guarantee that, through the planning process, sufficient secure, convenient and high quality cycle parking is included in all new developments (for visitors as well as occupiers) and is also retro-fitted to existing developments wherever planning policy or specific incentives can secure this. The Mayor must set a target for cycle parking installation above that of previous administrations and must incentivise boroughs to improve the level and quality of parking where there is existing and anticipated demand.**

## Sustainable freight delivery: proposal 77

We note that this proposal is the first to mention cargo bikes explicitly and it does so in the context of new developments. While this is welcome, we would like to see proposals that promote the use of cargo bikes and cargo ebikes across the capital for all last mile deliveries (see ebike section above).

We note that cargo bike hire programmes are running in Camden and Waltham Forest. These can enable individuals, on a housing estate for example, to make use of a cargo bike for shopping trips. They are also being trialled with businesses to establish alternative delivery and servicing approaches.

**The potential of cycle freight and ebike cargo deliveries should be recognised in the MTS and included in proposals for last mile journeys, as well as in the context of new developments.**

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Development and permitted land use intensity is thus affected by the limits of CTAL and the absence of a cycling-journey equivalent to PTAL. In current planning processes the maximum permitted land use intensity is linked to the local PTAL, and redevelopment at higher intensity land uses is contingent upon CIL or S106 contributions being used to increase the PTAL, or otherwise mitigate the development’s increased transport intensity. The MTS does not suggest how increased cycling infrastructure provision might be quantitatively incorporated into the planning process, for example how a targeted investment in the local and strategic cycle network could justify greater land use intensity.

## Supporting good growth by transport improvements

### Question 19: proposals 78 -95

We share the view (Proposal 78) that local development plans must contribute to mode shift away from car use to walking, cycling and public transport.

We note that because cycling is so effective and has such a high cost: benefit ratio, accurately valuing cycling will lower the financial cost of mitigation that will be needed to make a development viable. It also means that the value of cycling is addressed as a benefit, not a cost.

### Silvertown tunnel: Proposal 88

While LCC supports cross-river public transport, walking and cycling projects, we have consistently opposed road-building projects that will generate additional motor traffic and congestion on both sides of the Thames. As we noted in our previous consultation responses, the implementation of road-pricing or tolling, on a trial basis, for the Blackwall and Rotherhithe tunnels, has not been tried and its potential impacts are unknown. Tolling could reduce demand to a level that eliminates the need for a third tunnel bore at Blackwall. Demand for the tunnels is also likely to be reduced by provision of improved public transport crossings and cycling and walking bridges.

The Silvertown tunnel is a very costly project which will be unlikely to recover its capital cost unless additional motor transport use is encouraged by lower tolls – the consequent growth in motor traffic would undermine the declared principles of the MTS.

**The MTS should not support new road building, such as the Silvertown tunnel, that will lead to greater levels of motor traffic in the capital. All new public transport schemes must take cycling into consideration by providing secure cycle storage at stations and cycle carriage at off-peak times on rail-based transport.**

### Walking, cycling and public transport crossings: proposal 89

LCC welcomes additional public transport, walking and cycling river crossings. To secure best value such crossings must integrate with a coherent, safe and comfortable cycle network across the capital.

We note that the Emirates cable-car crossing, on the north side, does not provide adequate links for safe cycling. For example Silvertown Way, a rare case of what is effectively a three-lane road, is a hazardous design for all road users.

**New cycling and walking crossings are welcome and must integrate with the proposed cycling network.**

### Airport links: policy 95

**Improvements in surface links to airports must include cycle routes; all rolling stock used on new rail services must allow for all day carriage of pedal cycles destined for air travel (as on Gatwick Express and Eurostar).**

## 9. Chapter Six: Delivering the Vision

### New transport services: policy 21 and proposals 97 -101

#### Question 21

LCC shares the view (Policy 21) that new transport services must not encourage more car journeys. By making cycling conditions similar to those in Holland and by making those cycle and ebike trips attractive mode shift will be encouraged.

**We share the view that, as in Amsterdam and Tokyo, car use can be constrained through management of car parking and related charges.**

We note the arrival of autonomous vehicles in London and recognise that the vehicle technology development may be outstripping the development of suitable infrastructure, security measures and legislation.

**The advent of autonomous vehicles must not be allowed to contribute to greater traffic congestion and a further reduction in active travel. Autonomous vehicles, and trials thereof, must not take space from existing or future cycle routes.**

We share the view (p 265) that road user charging is an essential to deliver a fair and efficient funding system.

## **Borough implementation: Policies 23 -24**

### ***Question 23***

We strongly support the principle that boroughs must draft Local Implementation Plans that contain proposals for delivering the MTS.

**We note that the Healthy Streets approach is identified as a priority. This imperative would be strengthened by referring to the list of Healthy Streets measures listed on pages 54-55 and the quality standards contained in the Healthy Streets check and the London Cycle Design Standards.**

## **Devolution of powers**

In general LCC takes no position on the precise types of powers that could or should be devolved to the Mayor - and indeed to the boroughs. We do however support the general proposition that the Mayor of a city of 8 million people – soon to be 10 million people plus – should have a greater suite of powers across a greater range of competencies than is currently the case in London. It is unimaginable that the Mayors of cities like New York and Paris would be as tightly constrained in their scope for action as is the Mayor of London. If the capital is to be the world's leading megacity, growing in the "good" way that is rightly laid out by the Mayor and which will benefit everyone in the UK not just Londoners, then the necessary powers must be devolved to its governance. That includes more powers for the boroughs too, although a shake of up London's fragmented and inconsistent governance is also needed.

So far as transport in general and cycling in particular are concerned, LCC supports efforts to devolve more powers to enable the Mayor to invest in new infrastructure such as the ability to recapture some of the added land value that is created by such investment.

## **Mode share targets**

We note and welcome the changes in mode shares for travel in 2041. The move away from car use to sustainable modes is essential in a city with a growing population that is in danger of becoming more inactive and less healthy.

**We would like to see a further breakdown of the sustainable mode growth to assist highway authorities with planning of infrastructure along with interim targets. TfL should specify its cycling targets for each London borough in the light of the Strategic Cycling Analysis, Healthy Streets and Liveable Neighbourhoods programmes. Borough schemes should be assessed in the context of cycling targets.**

We note that TfL analysis has concluded that the highest potential for cycling growth is in outer London although in the past 17 years the greatest growth in cycle use has been recorded in inner and central London.



Some outer London boroughs have recorded little cycling growth and made little progress in improving conditions for cycling

**The Mayor must provide a pathway, with interim targets, for realising the potential for the growth of cycling in Outer London.**

## 10. Additional points

### **Making London's communities and places better and more attractive locations**

The new Liveable Neighbourhoods programme will be an evolution of the current Mini-Holland programme. Accordingly the lessons learnt from the three current Mini-Holland schemes must carry forward to all the new Liveable Neighbourhoods.

The experience of the three mini-Holland boroughs thus far has, we believe, been widely misrepresented and misunderstood. The experience in Waltham Forest, where the best data is available and schemes are most advanced at time of writing, is as follows.

- Effective community engagement from the very start, and continued through implementation, is critical; and it is most successful where the wide benefits to the neighbourhood are stressed rather than the goals for cycling per se.
- The most successful schemes thus far, and based on the model adopted to differing degrees by many European cities, has been a four-pronged approach where each element works in conjunction with the others:
  - i) Direct main road cycle tracks spreading up to 6-8km from key transport hubs/high density town centres;
  - ii) Low traffic volume and speed neighbourhoods bordering these routes;
  - iii) Increased crossings across main roads to facilitate pedestrian and cycling routes from one residential area to the next;
  - iv) Complementary measures including cycle hub parking at transport interchanges, cargo bike hire and bike loan, business engagement and promotion and cycle training etc.

**The Mayor must ensure that the appropriate briefing and directional documents are provided to borough councils so that the genuine lessons learned from the Mini-Holland schemes can be deployed to maximise the benefits of the new Liveable Neighbourhoods.**