

London Cycling Campaign

19 December 2016

City Plan 2036

<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-policy/Pages/Local-Plan-Review.aspx>

This consultation response is on behalf of the London Cycling Campaign, the capital's leading cycling organisation with more than 12,000 members and 40,000 supporters, many of whom live in, work in or pass through the City of London. The LCC welcomes the opportunity to comment on this plan. The response was developed with input from our borough group, the City of London Cycling Campaign, and the co-chairs of LCC's Infrastructure Review Group.

Question 6.4 What actions could the City Corporation take to reduce congestion in the City?

Rather than aiming just to reduce congestion in the City the aim should be to transform the City into a healthier, cleaner and happier place to work and live. This will benefit residents and employees and will encourage businesses to remain in or relocate to the City. It will enable London to remain competitive with other European financial centres which are already implementing scalable and sustainable transport policies.

Active travel modes (cycling and walking) are key components to achieving this. Creating an environment where cycling is a choice for any Londoner, who wants to ride the streets conveniently and without fear, should be a very high priority.

Key actions to achieve this are to:

- Create a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic to/from all key destinations and residential areas in the borough and beyond. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Ensure separation from high volumes and/or speeds is via protected space for cycling, or volumes and speeds reduced to low levels (below 2,000 PCUs daily). And quality on all Highways work (not just cycling schemes) should be assessed via TfL's London Cycling Design Standards (LCDS), with an aim for a Cycling Level of Service (CLOS) rating of 70 or above, with all "Critical Fails" eliminated.
- Ensure all Highways work is 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.
- Make "Direct Vision" lorries, with minimal "blind spots" the standard HGV type used in the City, including implementing a more aggressive timeline for the City than is being proposed by the Mayor for London overall. And building on the example of the City's street and

highway maintenance supply contracts, by requiring all lorries/contractors in your supply chain and under control via development orders to be Direct Vision and CLOCs and FORS-accredited.

Question 6.5 Should occupiers of large developments be required to only accept deliveries outside peak periods, including at night-time? Should medium-sized buildings be required to provide off-street servicing areas?

Occupiers of large developments should generally be required to only accept deliveries outside peak periods, including at night-time.

Medium-sized buildings should be required to provide off-street servicing areas and consideration should be given to the feasibility of creating shared service areas for smaller businesses.

There should also be greater vigilance to prevent vehicles, e.g. delivery and private hire vehicles, causing congestion by waiting illegally outside offices during daytimes (and where restricted evenings also).

Question 6.6 Should we promote consolidation centres, even though this may require the use of land outside the City and over which the Local Plan has no jurisdiction?

Consolidation centres should be promoted and the City of London should cooperate with neighbouring boroughs to achieve this. Consideration should be given to reducing the growing numbers of personal deliveries being made by LGV etc. to workers in the City.

Innovative approaches to solving this and other freight and delivery issues should be considered and developed, including encouraging “last mile” deliveries by cargo bike, moving goods by river and/or canal and rewarding businesses who achieve more efficient servicing and delivery arrangements.

Question 6.7 How can we reduce the impact of motor vehicle traffic on air quality? What measures could reduce exposure to pollution? Should we encourage alternative modes of travel, including electric vehicles, providing appropriate electric charging infrastructure without causing street clutter?

While electric vehicles can play a part in improving air quality, in particular for public transport vehicles, they can't reduce congestion or improve health outcomes on inactivity. The focus should primarily be on achieving a shift from motor vehicles to other, more efficient and healthy, travel modes i.e. cycling and walking or public transport. 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 (to the public purse, including avoiding costs associated with pollution) according to a DfT study.

Reducing overall motor vehicle traffic capacity may not decrease congestion but will free up space for less polluting modes, encourage modal shift and reduce pollution in itself.

Question 6.8 How can more open space and pedestrian routes be created in and around large developments? How can we create more space for pedestrians? Should certain streets in areas of high congestion be pedestrianised or time limited, or should certain types of vehicles be restricted in those areas?

Section 106 and CIL funding should be used to improve conditions for cycling and walking. Planning for new developments should consider and prioritise space for cycling and walking within the development.

In general, reducing parking, waiting and loading areas, and road capacity and through routes will encourage model shift and create more space for cycling and walking infrastructure.

The City should have a network plan for cycling and walking based on demand/potential for both modes and new planning applications should be required to be compatible with this.

Yes, on certain streets in areas of high congestion motor vehicle traffic should be removed some or all of the time (although the default should be to continue to enable cycling). As well as this, restrictions to certain types of vehicles should be considered to restrict their route choice.

The City has shown it is willing to implement bold and high profile schemes to remove through motor vehicle traffic from streets – it should continue the work it has started, such as at Bank junction in prioritising people over vehicles across the area.

Question 6.9 Should the requirements for cycling parking in developments be increased, remain the same or be decreased? Should large developments be required to provide off-street public cycle parking spaces?

Requirements for cycle parking in developments should be increased (consideration for cycle parking should include residents, workers, visitors to both ground floor and upper floor businesses, and include provision for a wide range of cycles e.g. handcycles, cargo bikes). Requirements for showers and changing facilities should also be implemented. And in addition to these measures, which can be seen as a tax for businesses, incentives such as rate rebates should be considered for businesses that achieve high levels of cycling by employees or suppliers.

More public cycle parking is required across the City also – and the City should plan for this.