

London Cycling Campaign – response to the Further Alterations to the London Plan

January 2014

The London Cycling Campaign (LCC) has more than 12,000 members, and 40,000 supporters, and has been the voice of cycling in London for more than thirty years. We welcome the opportunity to comment on the further alterations to the London Plan (FALP).

Vision for Cycling

LCC welcomes the inclusion of the Mayor's Vision for Cycling in the London Plan programme but this aspect of the Plan must be strengthened to highlight the importance of delivery and project completion. LCC lobbied strongly for the adoption of continental standards for cycling infrastructure in London and we are pleased that these will be implemented. We are concerned however the the word 'completed' has been deleted from the section relating to Cycle Superhighways (page 217 Policy 6.9). A key issue, raised by both LCC and the London Assembly, in relation to cycle infrastructure is the matter of delivery. Cycle users, and potential cycle users, have been disappointed by the abandonment of the both the London Cycle Network and the LCN+ before completion - this must not happen with the Mayor's current programmes and a schedule for completion of the cycle Superhighways, Quietways, Mini-Hollands and Better Junctions must be provided as an appendix to the Plan.

The Plan makes repeated reference to the London Cycle Design Standards (LCDS) which are currently being revised and will likely be adopted in their new form before the London Plan is approved. It must be made clear to Boroughs that the revised version of the LCDS must be followed as soon as it is available and that officers should follow new TfL guidance on cycle infrastructure design, through contact with the TfL design team, in the interim. Recourse to the old LCDS (2005) standards, without consulting TfL, may undermine road safety.

Cycle parking standards

LCC welcomes proposals to strengthen the cycling parking standards in the London Plan – such changes are well overdue and this point was highlighted in all of LCC's previous responses to both original London Plan (2010) and its subsequent alterations. We note that the current proposals, while an improvement on the previous inadequate standards, fail to meet the recommendations of the SKM consultancy report (Nov 2013 – download provided as evidence for the FALP 2014), carried out for TfL as part of the evidence collection for the latest alterations to the London Plan.

TfL has stated that its proposed recommendations were diluted because "there are some practical/cost considerations in delivery and we sought to strike a balance" without providing any further detail. This is not a satisfactory argument. **We strongly advise that the full SKM recommendations are followed and any inconsistencies in the proposals are addressed.** We note that the SKM recommendations are likely to underestimate demand because the figures cited, in that report, for cycling to work do not discount the number of people who are unemployed or work from home – allowing for this factor the percentages of workers cycling to their workplace is approximately third higher e.g. 15.3% in Hackney rather than 9.2%.

Increase in car parking spaces in new developments

LCC objects to the proposed increase in car parking provision, through higher permitted levels of parking in new developments, which runs contrary to Mayoral aspirations to reduce car use and car dependency. Encouraging car ownership and car use by offering a significant additional number of car parking spaces in new developments will increase congestion on the roads, add to pollution levels and have a negative impact on the health of London residents. Greater car use will also undermine the Mayor's efforts to encourage walking and cycling.

River Crossings

LCC has previously objected to the proposed boost to motor traffic through the creation of two additional motor vehicle crossings across the river Thames at Silvertown and at Woolwich. We support additional crossings for sustainable transport modes rather than for private motor traffic.

Specific comments

Page	Item	LCC Comment
202	Cycling projects	<ul style="list-style-type: none"> • Mini-Hollands programme has started but is marked as starting in 2017. • Cycle superhubs at rail stations will not be complete by 2016 • We would welcome the completion of all 30 junctions by 2016
209	Policy 6.4 d	Add underlined text: Providing new river crossings <u>for sustainable transport modes.</u>
217	Policy 6.9 Cycling A.a	Reintroduce the word <u>complete</u> in the commitment to deliver Cycle Superhighways in the format 'which will include <u>the completed Cycle Superhighways.</u> ' And provide, as an appendix, a timetable for the <u>Mayor's major cycling programmes notably Cycle Superhighways, Quietways, Mini-Hollands, and Better Junctions</u>
217	Policy 6.9 Cycling B.c	We support the draft Sustrans addition to c. 'contribute positively to an integrated cycle network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable <u>designed in accordance with, and to best practice outlined in, London Cycling Design Standards 2014 (or subsequent revisions).</u> ' (recommended addition underlined)
219	Map 6.2	While LCC would like twelve, continental standard, Cycle Superhighways to be complete by 2015 this is unlikely to happen. This error highlights the issue of delivery of the Mayor's cycling programme. As noted above, we strongly recommend that the Mayor provide, as an appendix to the London Plan , a timetable for the his major cycling programmes_ notably Cycle superhighways, Quietways, Mini-Hollands and Better Junctions
220	6.35 , 6.35a Cycle parking	We strongly support this addition. We recommend that the reference to the London Cycle Design Standards in all instances refers to the 2014 revised version which should be approved by the Mayor before the London Plan is approved. This will provide

		significant improvements to the now outdated 2005 edition.
224	Policy 6.13 Parking C	The alteration proposed is an effective carte blanche for not applying the (much weaker than previously) standards set in table 6.2. We suggest replacing the words 'should be the basis for considering' with the words <u>must be applied to</u>
225	Policy 6.13 Parking E.d	This change again undermines the original text. We suggest <u>rejecting this change</u>
225	6.42	The large expanses of empty car parking spaces across London must be better utilized as the original London Plan suggests.
226	6.45	This addition again offers local authorities the opportunity to allow developments with higher car parking provision in the mistaken belief that this will be re-generative. The experience of Westfield Stratford is that footfall in shops is high despite a large proportion of car parking spaces remaining empty. We suggest <u>rejecting this addition.</u>
230	Table 6.2 Car Parking standards	This table proposes very significant increase in car parking provision (33%, 50% and 100% (less than 1 to 0-1)) in residential developments. This will encourage families to run two or more cars with consequent impacts on local congestion and pollution as well as discouraging cycling and walking. <u>We suggest rejecting this change</u>
232	Table 6.3 Cycle Parking minimum standards	<p>We welcome the decision to raise the cycle parking standards in new developments, a change that the LCC put forward in its responses to all previous iterations of the London Plan.</p> <p>We are, however, most concerned that the Mayor has chosen not to follow the recommendations of the extensive report by SKM that is provided as part of the London Plan evidence. That report specifies, for example, provision of one space per 75 sqm in the B1 office category as opposed to 1 per 90 in the TfL proposals. <u>We suggest the Mayor follows the recommendations in the SKM report including the proposed minimum of 2 spaces provision in almost all cases</u></p> <p>We do not think that this quote from the TfL document provides a satisfactory argument for rejecting the SKM recommendation:</p> <p>"While SKM proposed an even higher requirement in their report (1 per 75 sqm) which would provide for a c19% mode share (versus c16% proposed), there are some practical/cost considerations in delivery and we sought to strike a balance."</p> <p>Developers such as Argent have stated that they have had to upscale their cycle parking provision in developments to meet client's needs. Thus contrary to the non-specific TfL assumption about the practical/cost considerations – the outcome of higher standards and better provision may be more satisfied clients.</p> <p>We note that SKM mistakenly used lower figures for cycling to work from the 2011 census because they did not allow for people who are unemployed or work from home and do not therefore travel to work. Making such an allowance raises the proportion of workers</p>

		<p>arriving on bike by up to a third.</p> <p>We also note that the floor space per person in offices is continuing to fall. At LCC for example we have 10 sqm of gross floor area per FTE staff member and work station capacity for additional staff. The SKM report uses lower density levels to gauge parking need and future higher densities may require an upward revision to the number of parking spaces.</p> <p>In the case of LCC almost all staff use bikes to arrive at work, which might be expected, but we would also point to the Guardian newspaper in King's Cross where 25% of staff arrive by bicycle (in part because of the excellent cycle parking and shower facilities) and Gumtree/eBay in Richmond where a third of staff arrive by cycle.</p> <p>In an unpublished LCC survey of 45 businesses in central London more than 40% stated that all parking stands available were often full. Of the 130 employees who responded to a parallel survey more than 60% said stands were filled to a level of more than 80% and 18% said they exceeded capacity.</p> <p>As the evidence from such examples, and the SKM report, shows the demand for cycle parking is continuing to grow. It will be further boosted by the Mayor's £913m investment in improving road conditions for cycle users.</p> <p>Setting cycle parking levels lower than the recommendations of the SKM report on the basis of so called 'balance' could lead to under-provision over the period of the London Plan's timespan and undermine cycling growth.</p>
232	C3-C4 Dwellings	<p>We note and welcome the proposal to increase the amount of cycle parking provided in residential developments but suggest that the <u>allocations for larger homes be raised as well</u>, notably where parking is within the curtilage of a single family house. (exception for units of less than 45 sq m now excluded)</p> <p>Families that cycle invariably have at least one bicycle per family member including children. Where communal parking is provided for residents this should be arranged in small clusters, shared by named individuals with clear management of the secure area. The proposed FALP text should additionally state that <u>cycle parking areas should allow easy access and cater for cyclists who use adapted cycles</u>. (included in revision draft)</p> <p>The alternative to adequate residential cycle parking is street parking. Leaving cycles overnight in the street encourages theft and leads a quarter of victims of bike theft to stop cycling (TfL Chain Reaction 2004) and two thirds of victims to cycle less. The police say</p>

		that London already has 22,000 reported thefts per year and that three times that number may go un-reported. Decreasing the number of cyclists per year by 20,000 (a quarter of victims) due to theft and insufficient cycle parking provision undermines the Mayor's targets for cycling growth.
232	D1 Places of education	Omission of the SKM proposal for a minimum of two short stay spaces is a significant error. It is common for several parents at a time to be dropping off children at nurseries and reception classes. Even the two spaces (one stand) is insufficient given that most child carrying bikes do not fit well at two per stand – <u>4 spaces should be the minimum</u> . Integrating short stay cycle parking outside nurseries/schools with railings/street furniture should be suggested as an option.
232	D1 Other	Neither the SKM nor TfL standards require minimum provision in this category. Bearing in mind the 'get out clause' on page 233 allowing developers to negotiate (in)adequate provision with local authorities <u>there must be a minimum in this category</u> . Some dental and doctor's surgeries for example have a small staff but a continuing stream of patients. (dental surgery provision for visitors increased to 1 per 3 staff)
232	D2 Sports	Both the TfL and SKM proposals would be quite inadequate for levels of existing demand at some London swimming pools. <u>Provision of short stay parking in this category is best expressed in terms of a percentage (we suggest 25%) of the maximum number of admissions</u> . At the Hackney Lido up to 100 bicycles are parked at peak times (2013) for a maximum pool capacity of 350.
232	Stations	Absence of clear standards for rail station risks developments, such as London Bridge, providing inadequate levels of cycle parking at inconvenient locations. <u>As a minimum requirement of the London Plan all station developments must formally agree cycle parking provision, as well as access and signage with Transport for London and the local authority before planning permission is granted</u> . The comparison of cycle parking at London mainline stations with that in the Netherlands is striking with Dutch stations such as Rotterdam, Utrecht and Amsterdam offering 7000 cycle parking spaces each compared to 2000 in total at all of London's main stations. We note that Network Rail sought to minimize the amount of cycle parking to be provided at London Bridge by referring to old TfL guidance while acknowledging that new guidance had been provided.

Preventing poor implementation

The standards, as currently drafted, do not specify the required area that needs to be allocated for cycle parking with the result that developers can allocate insufficient space for the required number of cycles. We advise that the area to be provided per cycle space (one square metre) be included in the standards. Where developers are providing two-tier stands

(which are more costly) they can make the case for providing less space than required to the planning authority.

As we noted in our response to the London Plan 2010 Table 6.9 must be revised to specify space provided for bike stands to prevent very low grade provision. Add "A minimum area of one square metre must be provided for each cycle space."

Paris approach to standards

We note that in Paris defining provision in terms of cycle spaces per unit of gross or net floor space has been dropped in favour of requiring that 2.5% of a building's area be allocated for cycle parking. This prevents developers allocating insufficient space for the required number of cycle stands.