

## **Kensington & Chelsea Local Implementation Plan (LIP)**

*14 December 2018*

<https://www.rbkc.gov.uk/parking-transport-and-streets/managing-traffic-and-transport/latest-draft-local-implementation-plan>

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

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

This response was developed with input from LCC's borough groups.

### **General comments on this scheme:**

This LIP is opposed.

While the principles, priorities and targets enshrined in the LIP and largely taken from the Mayor's Transport Strategy (MTS) are welcome, there is no concrete action proposed likely to help the borough achieve those. And indeed there is evidence of deep hostility to the Healthy Streets framework, to increasing walking and cycling and reducing motor traffic embedded in the LIP.

As such, this LIP can in no way help the council fulfil the aims of the MTS, nor is it likely to lead to improvements in walking, or cycling, or public transport in the borough.

### **Specific points on this scheme:**

- The LIP sets out six objectives consistent with the MTS - the first being to "encourage more trips by walking, cycling and public transport". The borough also highlights the top five concerns in responses to its 2018 Commonplace survey as being "cycling doesn't feel safe, pollution, speed of traffic, too much rat-running, congestion for cars".
- However, despite targets for reducing traffic volumes and car ownership in line with the MTS, there are no firm measures detailed to restrain private car use. There are no measures to address the concerns identified by the Commonplace survey or to enable walking and cycling.
- The only mention of protected space for cycling is to note that it (as well as pedestrian crossings) result in a loss of capacity for motor traffic. While recognising the lack of an east-west cycle route through the borough the extent of support for CS10 is to "study carefully TfL's developing designs and modelling of the impacts on the local road network". The strong implication here is that the council views loss of

capacity for motor traffic, and by association protected space for cycling and provisions for pedestrian crossings, negatively.

- On borough roads, cycling is only mentioned in relation to Quietway routes. However, in the absence of filtering traffic from residential roads such routes are unlikely to lead to an increase in cycling. The LIP rejects “large scale filtering” of roads since it “could lead to a less efficient use of the [main road] network”. Again, this implicitly not only suggests that the only efficiencies in the use of the network come from driving motor vehicles, but also that residential streets are an appropriate place for through motor traffic journeys.
- We welcome the associated consultation on the introduction of pilot 20mph areas (see separate LCC response), but this should be contrasted with the blanket 20mph limits implemented by most other inner London councils.

### **General points about infrastructure schemes:**

- LCC requires infrastructure 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 an area. 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.
- 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.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above.

- 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 issues” eliminated.