

**London Cycling Campaign response to Southwark Our Healthy Streets Dulwich (phase 3) consultation**

27 March 2020

<https://consultations.southwark.gov.uk/environment-leisure/our-healthy-streets-dulwich-phase-3/>

**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:**

- These proposals are supported. They will enable more people to cycle and walk in the area and are a vital step in reducing through motor traffic, motor traffic dominance and unnecessary motor traffic journeys in the area.
- We fully support the more detailed response from our borough group, Southwark Cyclists.

**Specific comments on this scheme:**

- There is a risk that this scheme does not, as currently designed, fully eliminate through motor traffic from the residential and other non-distributor roads in the area. Further consideration should be given to any remaining through routes, potentially including Dulwich Park in area B, as well as what happens outside operating hours on Townley Road. Areas A and C should as much as possible see strong reductions in through motor traffic throughout also.
- The further proposed restrictions in this context are also supported – particularly restricting private, through motor traffic on Dulwich Village itself.

**General points about “low traffic neighbourhoods”:**

- The area is currently blighted by “through” motor traffic using primarily residential streets to avoid the main road network, creating significant barriers to walking and cycling and enabling far too many unnecessary car journeys, with resulting negative effects including noise and air pollution, inactivity, climate-changing emissions, collisions and injuries.

- “Low Traffic Neighbourhood” (LTN) schemes, most notably elsewhere in London, demonstrate that removing or strongly restricting through motor traffic from primarily residential neighbourhoods has major benefits for walking and cycling, and in many cases public transport, activity levels, pollution, community cohesion, business vitality etc.
- These schemes reduce overall motor vehicle movements across an area, including the main roads, and encourage “mode shift”. And this tends to happen without significant negative impacts to existing main roads and the broader transport network in the medium to long term.
- As such, and alongside main road schemes (such as cycle tracks or other “road diets”), these schemes are a vital step towards enabling active travel and reducing the dominance of the motor car in the borough and across London. It is important the council remains firm on these plans and the principles behind them, and delivers benefits for the broader community, rather than listening to any vocal minority (often car owners) that emerges during the engagement and consultation process.
- It is also important that the council monitors any adverse impacts and mitigates them or adds to the scheme as rapidly as possible. Progress towards improving main roads and residential streets in London is never perfect and rarely holistic. It is vital then that councils, rather than reducing rate of progress on schemes on this basis, increases the rate of progress. To do this requires accepting schemes are often controversial and always imperfect, and despite this moving forward those schemes that are significantly progressive in removing overall motor traffic volumes and/or significantly increasing walking and cycling mode share rapidly.
- For this reason, monitoring, both before and after implementation, of air quality, motor traffic volumes and speeds, cycling and walking volumes and potentially even footfall and retail vacancy rates of nearby shops on nearby main roads and residential streets this scheme could impact, would be desirable, up to several years after the introduction of the scheme, sporadically. This would enable the borough and other London, and UK, transport bodies, councillors and officers etc. to build up a valuable evidence base on the results of introducing LTNs, and enable the borough to build schemes to mitigate any adverse impacts as well as reassure residents and shopkeepers of the benefits medium and long-term.
- Physically, modal filters should be constructed so as to provide 1.5m gaps from building line to building line. This width ensures smaller cars cannot circumvent the filter, but that a wide range of cycles can pass through comfortably. Physical filtering is generally (but not in every circumstance) preferable to ANPR camera enforcement (which can see continued non-compliance by some), width restrictions (which reduce speed, and volume, but to a more limited extent) and use of one-ways (which can see increased motor vehicle speeds and are not as beneficial overall, generally).
- Further detail on “low traffic neighbourhoods” is available here: <https://lcc.org.uk/pages/low-traffic-neighbourhoods>

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

- The Mayor's Transport Strategy relies on a growth in cycle trips to keep London moving. This means infrastructure schemes must 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 and enable all ages and abilities to cycle, 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. Above 2,000 Passenger Car Unit (PCUs) motor vehicle movements per day, or 20mph motor traffic speeds, cycling should be physically separated from motor traffic.