London Cycling Campaign's response to the London Infrastructure Plan 2050 consultation October 2014



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 London Infrastructure Plan 2050 consultation.

We note and welcome the statement in the Plan that the Mayor wishes to see levels of cycling in London matching those in Amsterdam or Copenhagen (p 50 of Transport Supporting Paper (TSP)). Both Amsterdam and Copenhagen are the envy of other capitals because they already have cycling mode shares in excess of 30% of journeys. High cycling levels address both a city's transport needs and its residents' health requirements, despite requiring a relatively low level of investment in infrastructure.

The Mayor has previously stated that he sees no reason why London should not again, as at the start of the 20th century, have 20% of journeys made by cycling. Such a modal share for cycling is commensurate with the declared wish of a quarter or more of Londoners who say they wish to cycle or cycle more (Synovate survey for TfL 2009). As the Mayor recognises in his Vision for Cycling, to achieve such levels of cycling, both actual and perceived road danger has to be significantly reduced.

Achieving far higher levels of cycling in London can make a greater contribution to solving the transport challenges posed in the Plan than any other single measure.

Even the unambitious modal share target of 10% cycling by 2050 cited in the Plan (see below) would represent more than 3 million daily journeys. This considerable contribution to transport needs must be recognised and prioritised in a document that looks forward not to the immediate future but to 2050 when London may not only have a much higher population but also far greater health costs and higher pollution levels, both of which are addressed by increased cycling levels. If cycling is to be an integrated part of London's transport planning then it must be fully reflected in documents such as the London Infrastructure Plan, rather than left in a silo and subsequently overlooked.

Despite the assertion that the aspiration is to 30% plus levels of cycling as a proportion of journeys the quoted target for cycling modal share by 2050 (page 98 of Transport Supporting Paper) in the Plan is a conservative 'at least 10%' and the target for 'Dutch' quality cycle routes is 200kms or, roughly, one fifth of London's A-roads. This a very low level of ambition, on both counts, for a transport mode that has grown significantly in the past decade and which offers the prospect of sustainable, heathy and affordable transport that can account for a quarter of London's journeys.

A significant, but not cycling specific, element of the Plan is the recognition that Londoners must be able to play a greater role in in the betterment of their own city. Chapter 24 makes the case for devolution of fiscal powers to London. Other devolved powers could help implement the Mayor's Vision for Cycling. In this context LCC's AGM in 2014 passed the following motion in support of devolution of powers to the capital:

- 1) To seek, from the next Parliament, transfer of any relevant powers (e.g. control of the Royal Parks), that are required to fully deliver 'Space for Cycling', to London's own tiers of elected government.
- 2) Whilst seeking a supportive national government policy towards cycling, to maintain the primary onus for delivering 'Space for Cycling' on London's elected leaders.

Below are our more detailed comments on the transport element (Transport Supporting Paper) of the London Infrastructure Plan.

Growth Assumptions

The Plan appears to assume that a bigger London is a better London without providing evidence for this assumption. In terms of quality of life London does not rank in the top 20 of any of the major international surveys. It is self-evident that population growth, without increased employment, housing and improved living conditions, will not make London a better city. It has been previously suggested that cyclists in a city are like canaries in mine – their presence demonstrates healthy conditions.

The ambition for London must be for a better city, not just a bigger city. A city like Sao Paolo has a population of more than 11m and all its roads have six lanes yet motorists are restricted to driving on four out of five weekdays because of the extreme congestion, while sustainable modes like walking and cycling have been neglected. Cycling fatalities in Sao Paolo, despite low cycling levels, are three times higher than in London. As London grows we must ensure that it is sustainable growth that improves the quality of life for all in the capital and does not simply add to GDP.

Road Pricing

The Plan makes very little reference to road pricing even though it acknowledges its critical importance for the capital. Such an oversight may be driven by reluctance to be associated with measures that are unpopular with some drivers but it cannot be accepted in a document that aspires to be a transport blueprint for the next 35 years.

We note the Mayor's adviser Matthew Pencharz has already made it clear that the current Mayor is supportive of using taxation to help remove the pollution caused by diesel engines. Pencharz told the *Daily Telegraph*: "Diesel has exacerbated greatly the air quality problem in London... We want a tax weighting on diesels. Over time it would retrospective". (*Daily Telegraph*, 21 May 2014)

The Plan's explicit reference to road pricing is in a short one page section (pages 55 and 56 of TSP) which states that:

'In principle, pricing offers the potential to tackle many of the issues identified by the RTF (Roads Task Force) including reducing congestion and pollution, helping better balance supply and demand on the road network and also potentially providing funding to support infrastructure investment.'

TfL states that it 'will help push the national debate' on this issue but offers no other commitment to progress a very obvious solution to congestion and funding problems over the next **35** years.

Without considering road pricing, despite its almost certain application at some point in the next three decades (and it can be applied in many sophisticated ways with modern technology), many of the Plan's other proposals are undermined. Building costly new tunnels and bridges, for example, could well be unnecessary if sophisticated road pricing systems are introduced. Similarly Plan predictions of growth in motor traffic in both inner and outer London may be incorrect if road pricing is introduced and there are improvements in public transport and walking and cycling conditions.

It is worth noting that both Tokyo (16% cycling mode share) and Amsterdam (36% cycling mode share) deter excessive motor vehicle use by either restrictions on car parking or by high costs for parking. Both cities score highly on quality of life measures. Road pricing can relate to both car use and roadside car storage.

As noted in the Plan road pricing is not only a way of limiting congestion but a means of raising revenue for improved infrastructure. In the section Diii on page 106 of the TSP reference is made to 'The case for implementing a different user charging system for road use is likely to increase during the period to 2050. This will be driven partly by an increasing need to allocate the available road space more efficiently as the population and demands outpace capacity, but also a need to find alternative sources of revenues as vehicle efficiencies and new fuel sources lead to declines in receipts from fuel duty and VED.'

Surely a statement of this significance must be fully addressed in the capital's infrastructure strategy for 2050.

Cycling targets and cycling infrastructure

Despite the initially declared aspiration to deliver Amsterdam or Copenhagen levels of cycling the Plan neither matches the targets set by those countries nor proposes to implement the infrastructure required to achieve such cycling levels.

The Dutch as well as the Danes achieved their high cycling levels over a period of 30 years and there is no reason to suppose that London cannot do the same with the right level of investment and sustained political will over a similar period. The growth in London cycling over the past decade has exceeded 80% in the city as whole and 180% on roads where TfL locates its counters. These figures were achieved with only limited infrastructure improvements and Mayor Ken Livingstone had to revise his earlier targets because they had been exceeded well before the deadline.

Setting a 10% modal share target for 2050 is unambitious and will not meet the capital's potential for cycle use nor make the necessary contribution to the population's transport and health needs. The Mayor currently has a 5% target for 2026 and, according to TfL, we are on track to meet that target. London's 2050 vision needs build on that target. The Plan does not provide any justification for the 10% figure.

The Plan refers to only two concrete implementation proposals on the cycling front despite the expectation of some 2.5 million additional journeys by cycle: – 200 kilometers of Dutch style cycle route and 'mini-Hollands' in half of the city's town centres. Given that the present Mayor aims to complete some 80km of cycle superhighway to continental standards by 2016 and implement three mini-Hollands over the same period, the proposals in the Plan represent a significant slow down in delivery.

If the Plan were to follow TfL guidance in the 2014 London Cycle Design Standards then Dutch grade cycle infrastructure would be required on all busy roads and at busy junctions – and there are more than 1000 kilometers of A-roads in the capital. Instead a figure of 200km is proposed – a third less than the length of separated routes provided in the much smaller city of Copenhagen (350km). The Plan does not give any reason for selecting the 200km figure.

The Plan does not mention cycle infrastructure such as the Mayor's Quietways, Greenways, cycle parking, and junction improvements. All these are vital to secure even the 10% cycling modal share the Plan envisages. By contrast a wide range of rail options are discussed.

As the Mayor's Vision for Cycling pointed out cycle journeys already account for more trips than the London Overground and DLR together. Assuming the total number of cycle trips exceeds 3m in 2050 this will be more than the number of bus journeys, tube journeys or rail journeys. The Plan must reflect this status and state how this transport mode will be catered for.

Increasing road space for motor cars does not reduce congestion

Despite the often repeated point that more road building is not the solution to congestion in urban contexts this solution, in the form of a tunneled ring road and several bridges, is retained in the Plan.

As far back as 1955 Lewis Mumford, the urban planning specialist wrote:

"People find it hard to believe that the cure for congestion is not more facilities for congestion."

"Most of the fancy cures that the experts have offered for New York's congestion are based on the innocent notion that the problem can be solved by increasing the capacity of the existing traffic routes, multiplying the number of ways of getting in and out of town, or providing more parking space for cars that should not have been lured into the city in the first place. Like the tailor's remedy for obesity, 'letting out the seams of the trousers and loosening the belt', this does nothing to curb the greedy appetite that [has] caused the fat to accumulate."

The recent publication 'Roads Were Not Built For Cars' by Carlton Reid (2014) provides a range of other useful observations:

"Built in 1976, the eight-mile South Korean multilane flyover was demolished in 2005, replaced with a country park and a bus route. What happened to the motorists and their cars? They dispersed, with no noticeable impact on congestion. Benefits have included the reduction of carcinogenic airborne particulate matter by 21 percent and lowering the city's summer temperature by 3.6 degrees Celsius."

In a city like London the first step to address congestion should be road pricing and roadspace reallocation to more efficient transport modes rather than road building.

Potential of Outer London

It is in Outer London that TfL and the Mayor appear to believe that car ownership and car use must inevitably grow (80,000 more trips – p 123 TSP) and public transport use will fall (by one percent). This, despite projects such as Crossrail 1 and 2, and the roll out of mini-Hollands.

TfL studies estimate that some two thirds of the potential growth in cycle journeys was in Outer London. Such growth is stymied by a range of barriers (as described in the Delivering the Benefits of Cycling to Outer London, TfL et al 2010) notably poor infrastructure. The mini-Holland programme is the first serious attempt to address the issues and lessons from that could transform active travel in many parts of Outer London.

Having identified the health benefits of active travel (p 49 TSP) and recognised that regression to more car journeys could mean a loss of 17,000 life years, while realising London's cycling and walking potential would add 62,000 life years, it is extraordinary that the Plan is anticipating, rather than countering, a growth in car use in Outer London.

If mini-Hollands prove successful, they must be rolled out to all town centres, not half of town centres. Similarly Dutch grade cycle highways and other cycling improvements not mentioned in the Plan must be rolled out to all of the capital, not simply 200 selected kilometres.

Integrated Transport

A visit to any London station and its packed cycle stands demonstrates the potential for integrated travel. This topic receives next to no attention in the Plan.

In Tokyo (population 13m /cycling mode share 16.5%) there are more than 2 million cycle parking spaces provided in the Greater Tokyo area most of which are at rail stations (City Cycling - Pucher et al 2012). Several thousand spaces at a single station is not unusual in either Tokyo or in Holland. In the Netherlands 40% of rail passengers arrive at stations by bike, in Tokyo 37% of bike journeys are to a railway station.

In London we have just over 2000 cycle parking spaces at all our major rail stations. If the Plan envisages 3m cycling journeys then a significant proportion of them will be to rail stations and adequate provision of secure, accessible cycle parking is critical to realising London's potential for integrated transport.

Planning for Cycling

The Plan aspires to a 30% modal share for cycling and declares a target of at least 10% by 2050. The first is a worthwhile and achievable aim. However, other than the two measures described above (mini-Hollands and 200km of highways), the authors of the Plan appear to assume that cycling will just happen.

Just as is the case with rail, air and motorised transport, cycling needs to be planned into a city's structure. Cycle routes, cycle parking, cycle friendly junctions, cycle hubs at stations, cycle hire will all have to be implemented on a Dutch or Danish scale if we are to achieve their cycling levels. All new developments must plan for high levels of cycling and all road and rail schemes must plan-in high levels of cycling.

Unless the important contribution of cycling to London 2050 is fully recognised and highlighted in the Plan, the prospect of achieving the targets envisaged will be significantly diminished.