

## London Cycling Campaign

30 January 2017

### Southwark Air Quality Strategy and Plan

[https://consultations.southwark.gov.uk/housing-community-services-department-community-engagement-team/air-quality-strategy-action-plan/consult\\_view/](https://consultations.southwark.gov.uk/housing-community-services-department-community-engagement-team/air-quality-strategy-action-plan/consult_view/)

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. The LCC welcomes the opportunity to comment on plans. The response is in support of the response from Southwark Cyclists, the borough group, and was developed with input from the co-chairs of LCC's Infrastructure Review Group.

LCC is a member of the **Healthy Air Campaign**, a coalition of household-name health, environment and transport organisations co-ordinated by Client Earth, that campaigns to clean up London and the UK's air.

London's air quality not only continues to breach EU legal limits, it's much worse than the standards called for by the World Health Organisation. Almost 10,000 Londoners die prematurely every year as a result of air pollution. Almost a quarter of primary schools are sited in areas that breach the legal limit for nitrogen dioxide (NO<sub>2</sub>). Doctors report that children spending their early years in parts of the city are suffering serious, long term or permanent impacts to their health and development. London's dirty air also costs the economy £3.7 billion. It's an unacceptable situation.

LCC generally supports Southwark's strategic aims of:

- Management of Air Quality
- Reduce Emissions from Buildings
- Public Health and Awareness
- Cleaner Transport
- Reducing Carbon Emissions
- Regulation & Enforcement
- Support the GLA Air Quality Aims
- Support Public Health

However the current Strategy and Plan does not go far enough. Given that motor vehicles are a major source of pollutants, the promotion of shift to active travel (cycling and walking) must be given greater priority and be one of Southwark's Strategic Aims. Creating an environment where cycling is a choice for any Londoner, who wants to ride the streets conveniently and without fear, is critical to improving air quality.

Key actions to achieve this are:

- Creation/completion of 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 an area. This network will include both physically-protected cycle tracks on main roads with

safer junction designs that separate those who cycle from turning motor vehicles etc. It will also likely include quieter routes along streets or through areas that feature low traffic volumes and speeds. 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.

- The planned cycling and walking networks should be developed based on demand/potential for both modes and new planning applications should be required to be compatible with this.
- Quality of 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. And all Highways work should be designed both to accommodate growth in cycling and not to increase motor traffic. 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 while minimising impact on air quality, walking, cycling, then public transport are key.
- 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.
- Reducing parking, waiting and loading areas, and road capacity and through routes will encourage modal shift and create more space for cycling and walking infrastructure.
- As well as encouraging modal shift for private motor vehicle use, commercial motor vehicle movements should be reduced wherever possible. And wherever possible, companies should be encouraged to operate outside of peak hours to reduce congestion. For instance, occupiers of large commercial buildings should be required to only accept deliveries outside peak periods (including potentially at night); medium-sized commercial buildings should be required to provide off-street servicing areas and the feasibility of shared service areas for smaller businesses should be considered; enforcement against illegal waiting, loading, idling etc. should be maximised; consolidation should be encouraged (including by cooperating with neighbouring boroughs to create consolidation centres); personal/internet deliveries to offices should be discouraged in the borough, with consolidation alternatives ("click and collect" etc.) encouraged; "last mile" alternatives to commercial motor vehicles should be explored and encouraged (cargo bike, river freight etc.).
- New residential developments should be 'no car' as a default. And Section 106 and CIL funding from new developments 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.
- Requirements for cycle parking in developments should be increased above London Plan (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 where appropriate should also be implemented. And incentives such as rate rebates should be considered for businesses that achieve high levels of cycling by employees and/or suppliers.

- More public cycle parking is required across Southwark also – and Southwark should plan for this.
- Southwark should set ambitious and measurable targets that it then strives to achieve (and can be held to account on) for all major commitments within the plan – with deadlines etc. attached. As examples, these targets should include: a percentage reduction in the children driven to school and correlated increase in the percentage that walk or cycle to school; a percentage decrease in council staff parking and car use; and also a percentage decrease in all-borough car parking spaces and car use/“modal share”.