

Response to Camden's Draft Transport Strategy

To Louise McBride and Sam Margolis

transport-strategy@camden.gov.uk

Executive Summary

In responding to Camden's consultation, we express our agreement with the vision, our support for the seven objectives and our acknowledgement of the value of the Draft Cycling Action Plan with the plans for a borough-wide cycle network.

As we go through the main document and the subsidiary documents, we make many suggestions, queries and observations. But we also make the case for changes in the Strategy that we believe would improve it.

We encourage Camden to:

- strengthen Objective 2 by making a plan to introduce modally filtered low-traffic neighbourhoods with a view to removing through motor traffic from all local roads, stage by stage, with targets.
 - and suggest that the presence of proposed cycle routes should be a criterion in prioritising the choice of low-traffic neighbourhoods;
- commit to conforming to LCDS and the avoidance of CLoS critical failures in all highway schemes rather than promising to include 'improvements' for cyclists;
- commit to introducing actual traffic reduction measures (i.e. filtering) as a default part of any Low Emission Neighbourhoods/Zones;
- commit to a radical change in the approach to construction projects so that no space for cycling or for walking will be lost during those projects;
- use a new approach to the enforcement of 20mph limits based on the removal of through traffic from local roads and the installation of protected cycle routes rather than traffic-calming measures in the remainder of the road network.

Our Response

This response to the consultation on Camden's Draft Transport Strategy is from Camden Cycling Campaign, the local borough group of London Cycling Campaign (LCC). We represent the interests of cyclists living or working in Camden and aim to expand the opportunities for all to cycle safely in the borough. We have discussed this consultation on CycleScape and at our committee meeting as well as attending the engagement session and studying the online material provided.

1. The Main Document

The foreword is very good.

Chapter 2

We have the following suggestions, queries and observations:

¶ 2.31: refers only to residents' travel mode share. But many cycle routes are used by commuters into and through Camden. Is this worth considering separately?

¶ 2.33: the particularly low cycling modal share in the north of the borough could be addressed by creating cycling hubs at tube and rail stations, with rental bikes, servicing and secure covered parking.

¶ 2.34: there has been criticism that PTAL does not recognise the difficulty in making non-radial trips. Is this justified and should there be a comment?

¶ 2.46: it is very clear that car use actively discriminates against the disabled, people on low incomes and people from BME groups – they tend not to drive but disproportionately suffer the consequences from people who do.

¶ 2.49: it is very concerning that annual reduction in car journeys ceased in 2012.

¶ 2.53: Car Clubs have been shown to be useful in reducing the number of parked cars. Clearly all car club vehicles must be electric.

¶ 2.54-2.56: when a driver changes to an electric vehicle, their car will be less polluting, but this will not encourage them to drive less. We have commented in detail on this issue in Section 4.

¶ 2.59: “Slight” casualty figures are considerably underreported. Is there any evidence to decide whether numbers have really increased or is it a reporting issue?

¶ 2.61: “85% of car driven trips in London driver only or just one passenger.” Can anything be done about this?

¶ 2.62: “The rise of delivery vans for internet shopping has also been shown to be inefficient, with most vans rarely even half full and many failed deliveries.” Can this be tackled under the Freight Action Plan?

The Vision

We agree that the vision as set out in Section 3.1 is a suitable vision for transport in Camden and that the Draft Transport Strategy reflects the key transport challenges and opportunities for the borough. We commend Camden on producing a challenging and visionary document.

The Objectives

We strongly agree with all of the seven objectives but we have some comments. In particular:

Investment Priorities for Objective 1: To transform our streets and places to enable an increase in walking and cycling

We are very supportive of the Draft Cycling Action Plan and the aim to deliver a high quality cycle network across the Borough.

¶ 3.9: Targets look good (ambitious even) but why is there no intermediate target for walking?

Liveable Neighbourhood schemes

Regarding the Liveable Neighbourhood schemes we note from Box 1 that IP1a and IP1b refer to Liveable Neighbourhoods in Kilburn and in Holborn. But IP1c: concerning the gyratory in Camden Town, proposes an area-wide ‘Liveable Neighbourhood’ and/or ‘Low Emission Neighbourhood’ scheme. We believe that a ‘Low Emission Neighbourhood’ would be a very inadequate solution for reasons explained in Section 4 of our response.

The Kilburn LN should focus on ‘hinterland’ first, not Kilburn High Road. The Holborn and Camden gyratory removal are desirable but not if they compromise potential for protected cycle routes.

Also, regarding the Liveable Neighbourhood schemes, we note from Table 4.1 that all of those listed in Box 1 are to be scheduled in 2019-2022. We would like to see some ideas of further Investment Priorities for the remainder of the period up to 2041.

Policy 1a – It is good to see hierarchy as stated.

Policies 1b-1g – Good to see removal of barriers, re-prioritisation of carriageway space etc.

Measures 1a-1h all look good.

Objective 2. To reduce car ownership and use, and motor traffic levels in Camden

This objective refers to the need to remove through motor traffic from residential streets in Policy 2b and Measure 2j which refer to developing a rolling programme of traffic restrictions and trials, both timed and permanent, to deter inessential car use and traffic 'rat running' in particular on our residential streets.

Low traffic neighbourhoods / modal filtering

We are concerned that there appear to be no specific plans for introducing any new low traffic neighbourhoods with full-time filtering, although Camden already has well-established examples of such neighbourhoods in Primrose Hill, in West Kentish Town and in the Argyle Square area.

We encourage Camden to strengthen this objective with a plan to remove through motor traffic from all local roads, generally in the context of modally filtered cells, stage by stage, with targets. City of London's Draft Transport Strategy proposes *Increasing the number of pedestrianised or pedestrian priority streets from 25 kilometres at present, to 35 kilometres by 2030. By 2044, at least 55 kilometres will be pedestrian priority, equating to half of all streets (by length)*¹.

CPZs

We support the plan to review the size and hours of CPZs and approve the associated Measures 2a, 2b, 2d.

As mentioned in our Section 2, we approve the Measure 2g, proposing the monitoring of temporary road closures. We also support Measure 2m: to develop a Freight Action Plan.

Objective 3: To deliver a sustainable transport system and streets that are accessible and inclusive for all.

Inclusivity of provision. We especially like the following:

Policy 3a – make our streets accessible and inclusive to people from all walks of life, age and abilities.

Measure 3b regarding cycling infrastructure that is accessible and inclusive for all ages, abilities and types of bicycle and Measure 3c about the removal of obstructive street furniture.

We are very wary of Measure 3m which suggests the delivery of shared space schemes – where cyclists share space with pedestrians. For example the Prince of Wales scheme, suggested the use of shared space at two points where it was proposed that cycles could bypass the signal when turning left. In this case, we would prefer to see a distinct cycle track with an an informal zebra marking to show where pedestrians should cross.

Objective 4: To substantially reduce all road traffic casualties in Camden and progress towards zero Killed and Seriously Injured casualties

We believe that it is essential to have actual enforcement of 20mph speed limits, not just signs and Speedwatch programs. We return to this issue in our Section 3.

Objective 5: To reduce and mitigate the impact of transport-based emissions and noise in Camden.

Electric Vehicle charge points should not be placed where they impede footways or would prevent later introduction of dedicated cycle tracks (Policy 5e). We return to this issue in our Section 4.

Objective 6: To deliver an efficient, well-maintained highways network and kerb-side space that prioritises the sustainable movement of goods and people

While ¶ 3.47 makes a very good statement on how private motor traffic, including taxis and PHVs, make the most inefficient use of limited carriageway space, ¶ 3.48 is weak in saying that limited carriageway and kerbside space therefore needs to be reallocated to other modes *where feasible*.

¹City of London Draft Transport Strategy, November 2018, Key Targets, Table 2, page 107.

We Like Policy 6c and Measure 6c which propose the provision of alternative footways and cycle lanes during works.

The 'where feasible' is redundant in Measure 6j(iv) which mentions investigating opportunities, with BIDS, for last mile deliveries by cycle freight, including the use of e-bikes and implementing dedicated cargo-bike loading and unloading space where feasible.

We believe that much closer interaction between Camden's departments of transport and planning is needed to prevent the regular hijacking of footway, cycle tracks and parts of roads during construction projects. The Draft Transport Strategy fails to mention this in investment priorities and Policies under this objective.

Here are some current examples of disruption of cycle routes during construction:

- in Purchase Street during Edith Neville School construction;
- the hoarding by the junction of Royal College Street and Baynes Street is preventing the construction of a blended junction and creating danger by obstructing drivers' sight line of the cycle track.
- the site at LSHTM is an example of permitting development that will cause maximum disruption of a cycle route (Tavistock Place).

Further, new developments rarely release space into the public domain, in spite of their increased pressure on footways and cycle tracks (the Kings Cross development is a notable exception to this). Part of the transport strategy should include the need for new developments and re-developments to allocate additional space for cyclists and pedestrians. This requirement could also mitigate the construction impact because the space to be released could be used for loading and unloading during the construction phase. If this requirement makes a project not viable, the project should not be approved.

Objective 7. To ensure economic growth and regeneration is supported by, and supports, a sustainable transport network.

We strongly support the need for a workplace parking levy as a measure to reduce the use of motor vehicles. We therefore would like a stronger commitment than just "progression of next steps subject to that feasibility."

2. Draft Cycling Action Plan

We very much appreciate the Draft Cycling Action Plan which is aspirational as well as having a lot of specific actions and measurable targets. We particularly like the following:

- The recognition in ¶1.2 that increased cycle use must include all groups - including children, the elderly and people with disabilities. As Camden's protected cycling network grows, it should help people of all ages and abilities to get around. The needs of older cyclists and those with disabilities should be considered in the planning of cycle infrastructure.
- The target in ¶1.3 – Zero KSI by 2041
- And the reference in ¶1.5 to the sustainable movement of goods and people.

We have tended to concentrate on Infrastructure schemes but recognise the importance of the complementary supporting measures.

Table 1 relates the measures in the Cycling Action Plan to the objectives in the Transport Strategy. As we have said above, we very much approve of the way Objective 1 leads to the Cycling Action Plan and the design and implementation of a Borough-wide cycle network.

Modal filtering: We will now reiterate our concerns about Objective 2 in the context of the development of the borough-wide cycle network. Section 2.2 says: "This network will combine direct, improved routes²

² In a network context, the use of the work 'links' might make more sense than 'routes'

on the existing main road network with a complementary set of routes on quieter roads ...'. Section 2.8 recognises that cycling benefits will be achieved through measures primarily aimed at reducing traffic. As we know, for example with reference to the proposed route of Q3, some of the links (e.g. Fairhazel Gardens) are residential streets but are insufficiently quiet. To reiterate our statements above: the removal of through motor traffic from all local roads, generally in the context of modally filtered cells, stage by stage is an essential ingredient in achieving Objective 2.

We therefore suggest that being a link in the network would be an important criterion in selecting a street for modal filtering and that this should be considered in the context of a low-traffic neighbourhood.

¶2.2 (i) - We object to the weakening phrase "where funding and space permits", Likewise 2.2 (ii) – "where feasible".

Monitoring of the effect of temporary loss of Highway Space (Section 2.6): we have already seen benefits from this approach, e.g. where Pancras Road approaches Crowndale Road³. We therefore encourage Camden to apply this approach wherever possible.

Section 2.7: States a very important position that improvements will not be restricted to the network links and that improvements will include increasing cycle permeability (and we assume other Quick Wins such as dropped kerbs and the removal of barriers) as well as junction safety improvements. Of particular importance is the promise of 'improvements' in all highway schemes where we would like to see a statement of standards. That is, conditions should not just 'improve' but should remove all CLoS critical failures of that street or junction⁴. We are hopeful that the promise in Section 2.10 to use LCDS as standard "on any route, or specific piece of infrastructure" is intended to cover this point.

Supporting Measures: Cycle training and bike loan schemes

We particularly like the following:

¶3.2 – Training.

¶3.3 – Cycle loans including e-bikes

We would strongly encourage Camden to follow the lead of Lambeth in offering adapted loan bikes and training to people with disabilities under their Try Before You Bike scheme⁵.

¶3.4 – e-cargo bikes.

The Borough-wide cycle network

We are very pleased to see concrete proposals for a borough-wide cycle network in Appendix C and D and plans for its implementation in Appendix A. Section 2.1 states: "The network has been developed in a way which reflects links across our Borough boundaries, to ensure onward route connections" but we believe that it needs a few more cross borough links e.g.

- For a route from Camden Town to Islington Town Hall via Agar Grove and Brandon Road.
- From Granary Square eastbound e.g. Handyside Street to Copenhagen Street.
- From Great Queen Street via Remnant Street and further east via Lincoln's Inn Fields.
- In the area to the south of the West End Project, the new link via Endell Street provides a route to Waterloo Bridge, but we need another route e.g. via Monmouth Street to Trafalgar Square.
- In the middle of the north of the borough, we need a main road route, e.g. on Heath Street and North End Way.

We are very concerned about the plans for Fitzjohns Avenue which is a primary link in the proposed borough-wide cycle network. See our comments below on the Draft Electric Vehicle Charging Points Action Plan Section 3.13.

³ One lane was closed by bollards for a time which proved that the space was not needed for motor traffic

⁴ A current consultation on changes at the junction of Heath Street and East Heath Road is a case in point

⁵ See <https://www.peddlemywheels.com/adapted-bikes>,

Implementation schedule Appendix A

All good – especially plans and maintaining cycle provision during construction

Targets : Appendix B

We think that having targets is very important and have some suggestions:

General points:

Since the Draft Transport Strategy e.g. Figure 5.2 and Table 5.2 provides an intermediate target at 2031, we would like to see intermediate targets in the Draft Cycling Action Plan

Camden should not feel the need to be constrained by the targets in the MTS, e.g.

- for cycle modal share, doubling the share by 2024-5 seems reasonably ambitious, but doubling again by 2041 rather unambitious when there will be an entire new generation of potential cyclists;
- for cycling to school 12% by 2041 seems unambitious;
- for cycling to work 15% by 2041 seems unambitious.

The long-term targets need to be reviewed regularly.

Specific points:

Cycle flows: 2% increase in cycle flows per annum both on screen lines and on automatic cycle counters is an ambitious target. We welcome the commitment to install additional counters – one is particularly needed in Tavistock Place.

Cycling to work: 10% by 2024/25 seems sufficiently ambitious.

Residents within 400m of cycle network: we are a bit mystified by 0% now. But the interim and long term targets look very good.

Secure cycle parking: we are also puzzled by n/a now because there 30ish bike hangars are already installed in Camden

3. Draft Road Safety Action Plan

Specific points:

- Sn 2.2. The categorisation of (3 years) KSIs by node, link and cell as a criterion for prioritisation of work packages looks very useful.
- Sn 2.9: 20 mph. We are concerned that the four stage enforcement schedule may not be the best approach to reducing speeding. For all local roads, we suggest that the removal of through traffic is the best approach and that this should, wherever possible, be done in the context of a Low Traffic Neighbourhood. For the TLRN, the SRN and the distributor roads we suggest that the installation of protected cycle routes should be regarded as a solution.
Stage 4. In the worst case when traffic calming measures are used, care is needed with horizontal speed measures (e.g. kerb build outs and pedestrian refuges) in the presence of cyclists. In general, we do not want more pedestrian refuges – they are not beneficial for pedestrians and remove space for cycling. Speed cushions are also mentioned - these should not be used on any carriageway used by cycles because they cause all vehicles including cycles to move out of line, leading to collisions.
- Sn 2.12. Removing parking from within 10m of junctions is good. But “wherever feasible” is not good enough. We suggest that cycle parking could be provided in this space.
- Section 3.8. CMPs and CLOCS. See our comments above on Objective 6.
- We can't find any reference to Direct Vision lorries. Surely there should be.

- Is there any information about casualties of older people, e-bike users? Any need for training older people that continue cycling and possibly when they change to an e-bike or tricycle etc.
- Other e-bike specific policies, e.g. recognition of the need for more secure parking for them.

4. Draft Electric Vehicle Charging Points Action Plan

Specific points:

- Section 3.5. We support pedestrians' concern that EVCPs should not take up limited footway space and, with one reservation, back the council's resolve to deliver all new charge points in the carriageway as the default option to minimise their impacts. Our reservation is that we are concerned that this should not prevent the removal of parking space to provide space for cycling. We therefore request that on the borough-wide cycle network, other solutions be found. For example, consider Prince of Wales Road which is soon to have a westbound cycle track: in order to add the eastbound cycle track, the parking bays on the north side will need to be removed. In this case EVCPs should not be placed in the carriageway on the north side.
- Section 3.13 refers to creating a 'School Low Emission Neighbourhood' in Fitzjohns Avenue which suffers from an extremely serious school run. But the approach is blinkered in that it concentrates only on the reduction of (some sources of) air pollution by attempting to persuade drivers to change to electric vehicles which anyway produce particulates from tyres and brakes. This approach will do nothing to reduce car dominance in Fitzjohns Avenue, which is a primary link in the proposed borough-wide cycle network. Instead, Camden Council should be encouraging the use of active travel to the schools in the area. For example, Fitzjohns Avenue, could be made a Healthy School Street by banning motor vehicles at school arrival and departure times. We believe that it is essential that any Low Emission Neighbourhood should be strengthened by additional measures such as filtering that reduce the number of car journeys and that there should be monitored targets for reduction of car use.

5. Summary⁶

We are very supportive of this ambitious Transport Strategy and the associated Cycle and Road safety Action Plans. However we have the following important proposals for improvements:

- **Modal Filtering and Low Traffic Neighbourhoods**

We would like to see a set of targets associated with the development of true low traffic neighbourhoods in which the local roads are protected against rat runs (i.e. through journeys by motor vehicles). We believe that it would be useful if the choice of these areas could be related strongly to Liveable Neighbourhood bids and to the needs of the cycle network. For example the Kilburn LN should focus on 'hinterland' first, not Kilburn High Road and another Low Traffic Neighbourhood should include the route of Quietway 3.

- **Low Emission Neighbourhoods/Zones**

These appear to be areas in which drivers are encouraged to change to electric vehicles. We see this measure alone as inadequate in that it does nothing to reduce the dominance of motor vehicles or to encourage sustainable travel. For example, we reject a Low Emission Neighbourhood as a substitute for a Liveable Neighbourhood in Camden Town and as infrastructure for a link in the Cycle Network in Fitzjohns Avenue. We therefore suggest that the installation of EVCPs throughout a neighbourhood should be associated with measures to reduce motor traffic and increase active travel.

⁶ We have noticed minor formatting issues on pages 64, 73 and (more significantly) 75 (text overflowing boxes).

- The effects of construction projects

We believe that much closer interaction between Camden’s departments of transport and planning is needed to prevent the regular hijacking of footway, cycle tracks and parts of roads during construction projects.

- Improvements for cycling in all highway schemes

The Cycling Action Plan says that all highway schemes will include ‘improvements’ for cyclists. We want a commitment that they should conform to LCDS and that no new highway scheme should include any CLoS critical failures.

- Enforcement of 20mph limits

We believe that the four-stage process may be too uniform across the roads with different functions in the road hierarchy. For local roads we suggest that the best approach would be to remove through traffic, preferably as part of a Low Traffic Neighbourhood scheme. For the SRN and TLRN and distributor roads we suggest the installation of protected cycle routes. But if traffic-calming measures are used as a last resort, they should not affect the safety of cyclists (e.g. speed cushions) or the future installation of protected cycle routes (e.g. traffic refuges).

6. Our responses to the Questionnaire

- | | |
|---|----------------|
| 4. The Vision we have set in the draft Strategy is above. Do you think this is a suitable Vision for transport in Camden? | Yes |
| 5. Does the draft Camden Transport Strategy sufficiently reflect the key transport challenges and opportunities for the borough? | Yes |
| 6. Objective 1: To transform our streets and places to enable an increase in walking and cycling. | Strongly Agree |
| 7. Objective 2: To reduce car ownership and use, and motor traffic levels in Camden | Strongly Agree |
| 8. Objective 3: To deliver a sustainable transport system and streets that are accessible and inclusive for all. | Strongly Agree |
| 9. Objective 4: To substantially reduce all road traffic casualties in Camden and progress towards zero Killed and Seriously Injured casualties | Strongly Agree |
| 10. Objective 5: To reduce and mitigate the impact of transport-based emissions and noise in Camden. | Strongly Agree |
| 11. Objective 6: To deliver an efficient, well maintained highways network and kerbside spaces that prioritises the sustainable movement of goods and people | Strongly Agree |
| 12. Objective 7: To ensure economic growth and regeneration is supported by, and supports, a sustainable transport network | Strongly Agree |
| 13. To what extent do you agree or disagree with the proposals for developing and implementing a borough-wide network of safe cycle routes to increase levels of cycling in the borough? (See Cycling Action Plan for details) | Strongly Agree |
| 14. To what extent do you agree or disagree with the proposal of reducing through-traffic on our residential streets, through the application of timed or permanent traffic restrictions? (See Objective 2 in Overview version and main version for details). | Strongly Agree |

15. Locations to invest significant levels of 'Local Implementation Plan' (LIP) funding, to deliver transformational highways improvement schemes, have been prioritised by the use of a matrix of indicators. These indicators relate back to our 7 objectives, and are Public Transport Accessibility Level (PTAL); Walking and cycling potential; Car ownership; Road traffic collisions; Air Quality; and Demographic data and levels of deprivation. To what extent do you agree or disagree with these indicators as the basis for LIP funding prioritisation? Strongly Agree

16. To what extent do you agree or disagree with the proposal to regularly review and amend parking charges, structures and availability in order to reduce car ownership, car use and traffic levels in the borough? Strongly Agree

17. To what extent do you agree or disagree with the principle of increasing the hours of control in, and reducing the size of, controlled parking zones (CPZs) to help reduce car use and traffic levels within the borough? Strongly Agree

18. To what extent do you agree or disagree with the principle of using parking policies to incentivise switching to lower emissions vehicles as part of measures to improve air quality in the borough, and contribute to reducing greenhouse gas emissions? Strongly Agree

19. Walking, cycling and buses are the most efficient users of limited kerbside and carriageway space. To what extent do you agree or disagree with the principle of reallocating road and kerb-side space away from motor vehicles in favour of these more efficient modes? Strongly Agree

20. The draft Strategy includes a Road Safety Action Plan with proposals to reduce the number of road traffic collisions in the borough. These include measures to ensure compliance with the 20mph speed limit, highways improvement schemes and proposals to restrict parking obstructions around junctions. Strongly Agree

21. We will be developing a Freight Action Plan, following this Strategy, building on the proposals set out in Chapter 3, Objective 6. In helping us develop that Plan, please use the space below to tell us how you think freight and servicing could be improved in the Borough?

We have read the suggestions in Measure 6, Part iv, which refer to the organisation via BIDs of 'last mile deliveries' by cycle freight.

- we suggest that there are many other organisations including hospitals, schools and universities that would benefit from receiving their deliveries by cycle freight.
- we also wonder whether there is possibility of integrating canal boat and cycle freight
- part v mentions a scheme to loan cargo bikes to businesses but we suggest that it is more likely that Cargo Services like 'Pedal Me' will be used. Incentives could be provided to encourage companies to use such services.

An essential part of any Freight Action Plan will deal with the safety aspects mentioned in the Draft Transport Strategy, including a policy of Work Related Road Risk (WRRR) – incorporating the Freight Operators Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS), working with stakeholders involved in delivering services in Camden to minimise road danger as part of their work related journeys

But what seems to be missing is a reference to Direct Vision lorries.

Jean Dollimore, John Chamberlain and George Coulouris
Camden Cycling Campaign
11 Grove Terrace, London NW5 1PH