Camden Cycling Campaign
15th February 2019

Response to Camden's Draft Clean Air Action Plan 2019-2022

To: Harold Garner, Strategic Lead - Sustainability, Air Quality & Energy, Camden
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This response to the consultation on Camden's Draft Clean Air Action Plan 2019-2022 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 as well as studying the online material provided.

Introduction

As mentioned above, our main aim is to increase the number of people who cycle and to provide a better cycling experience for those that already do so. Therefore it is beyond our remit to deal with all of the seven themes in the consultation:

1. Reducing emissions from buildings
2. Cutting construction emissions
3. Reducing transport emissions
4. Supporting communities and schools
5. Reducing emissions from delivery, servicing and freight
6. Public health and awareness raising
7. Lobbying

We will concentrate mainly on 3 and 4 and then go on make a few suggestions for 2, 5 and 6.

Reducing transport emissions (#3)

With transport emissions being responsible for ~50% of Camden's NO2 and PM10 emissions, and resuspension caused by motor traffic another 21%, this theme is clearly very important. We note that on page 36, the relevant headline action is: "Improving walking and cycling infrastructure". It is also self-evident that more cycling means less pollution and less congestion – the latter having a reputation for adding to pollution. Camden's Draft Transport Strategy 2.31-2.32 notes that:

> Only 8% of journeys between 2 and 5 kilometres made by Camden residents are cycled (the majority up to 2km are walked). This tails off to 5% of journeys of 5-10 km.
>
> TfL analysis shows that Camden, along with two other central London Boroughs (Lambeth and Westminster) have the greatest overall levels of cycling potential across the capital. It is estimated that approximately 600,000 trips per day could be cycled in Camden. Over 200,000 of these would be by residents, of which only 20,000 residents' trips are currently being made by bike.

When considered from the point of view of air pollution (rather than the fitness of Camden residents), all of the 600,000 trips per day are relevant. Our question is: "Can actions in the Clean Air Action Plan be used to add strength and extra funding to those already proposed in the Draft Transport Strategy?" We can see three ways in which this could be very effective in replacing motor-vehicle journeys by cycle journeys.

1. The Draft Cycling Action Plan which accompanies the Draft Transport Strategy is strong in proposing a borough-wide cycle network with targets for the percentage of residents within 400m of the cycle network set at 48% by 2021 and 93% by 2041. We suggest adding ambitious medium-term targets for 2022, 2026 and so forth.
2. People will usually be able to use local roads to access the nearest link in the cycle network. The Draft Transport Strategy's Objective 2 refers to the need to remove through motor traffic from residential streets, but apart from plans to bid for Liveable Neighbourhood schemes, there is insufficient commitment to make all local residential roads into Healthy Streets by means of modal filtering. This would not only encourage cycling but also improve the air quality.

3. Camden's Draft Transport Policy (paragraph 3.15) notes that:

> The availability and type of parking spaces, the size of CPZs and hours of control, as well as charging levels can all help to address inessential vehicle use.

We want to decrease the amount of driving so as to make roads safer for cycling and walking. Any such reduction will also improve air quality. Allowing uncontrolled parking at weekends will make it less safe for parents to cycle with their children.

Headline actions from the CAAP – reducing transport emissions

In the Table of Actions (page 42 on) we suggest the addition of the following:

- Set targets to use modal filtering to remove through motor traffic from all local streets[1]; the reduction in the number of car journeys would not only improve air quality on these mostly residential streets but produce streets where people will want to walk or cycle rather than drive.
- Support further ambitious targets for the percentage of residents within 400m of the cycle network for 2022, 2026 and so forth.
- Increase the hours of operation of CPZs, with a presumption of whole-day operation 7 days/week; and plan a targeted reduction in the number of parking spaces.

We strongly support the following actions in the table (our suggestions are in italic):

No 32. Aim to keep cycle routes open (if safety is not an issue) when road closures are planned.

> *This should be strengthened to say that there would be a presumption to keep cycle access through all works, not just those on cycle routes, except in very limited circumstances, and that this would be mandatory on cycle network routes.*

No 33. Assess the feasibility of removing parking spaces near junctions to improve visibility and safety; placing cycle storage or other green measures that don't impair pedestrian or driver visibility.

No 35. Continue to provide additional bicycle parking in the borough; especially in areas frequented by the public such as business improvement districts.

No 40. Re-prioritisation of road space; reducing parking at some destinations and/or restricting parking on congested high streets and A roads to improve bus journey times, cycling experience, and reduce emissions caused by congested traffic.

> *The space gained should be used for dedicated cycle infrastructure.*

No 41. To improve walking and cycling infrastructure through projects such as the proposed Prince of Wales Road and Camden Road cycle routes.

> *Set a target to complete the proposed borough-wide cycle network by an earlier date than currently planned.*

[1] Local Streets: those not on TLRN, SRN, or distributor roads. Figure 2.3: in Camden's Draft Transport Strategy

Supporting communities and schools (#4)

We are strong supporters of the three Healthy School Streets already in place. Although these provide a clean-air zone outside the school gate, we would like to know to what extent they reduce the school run (by car).

In the Table of Headline actions from the CAAP (page 45 on) we suggest the addition of:

- Prioritise an area-wide modal filtering scheme for each school that will enable children to walk or cycle to school on clean routes. This relates to Action point 54 which suggests designing clean routes but does not mention improving the roads on the route.

We have reservations concerning No 47 in the Table of Headline actions:

> Delivering a Neighbourhoods of the future project in the Fitzjohn's area in partnership with independent schools to encourage more sustainable forms of transport.
>
> This does include "Implement a minimum of 3 Healthy School Streets" but otherwise appears to consist only of providing charge points for electric vehicles. Bearing in mind that electric vehicles generate particulates by resuspension and brake and tyre wear, and that not all drivers will adopt their use, this seems very inadequate.
>
> These Healthy School Streets should be designed to have the widest possible impact on the school run, and should ideally create a substantial barrier to parents driving their children to a large number of NW3 schools. Resident exemptions might need to be used more comprehensively, to create a larger School Zone.
>
> If the measures result in the timed closure of a long section of Fitzjohns Avenue e.g. between Prince Arthur Road and Netherhall Gardens, this could be useful in the reduction of driving to school and encouraging people to cycle to school or to combine bus and walking.

We strongly support the following actions in the Table of Headline actions (page 45 on) :

> No 53. Continue to deliver Healthy School Streets in key pollution hotspot areas.
>
> *But we think only two per year is not sufficiently ambitious.*
>
> No 54. To develop bespoke clean air routes for individual schools in Camden highlighting clean routes to and from school as well as to relevant places such as libraries, community centres and parks.
>
> *These routes must be safe for cycling.*
> *See our point above about modally filtering the roads in the area containing the route.*
> *These routes are pointless and misleading if road changes are not made as well.*
> *Simply 'signposting' clean air routes to parents and children is patronising and wasteful.*
>
> No 57, 58. Idling penalties.
>
> No 65: Great Ormond Street Hospital to provide an air quality good practice toolkit for other NHS organisations.
>
> *We suggest that an area-wide modal filtering scheme[2] be applied to the surrounding roads.*

Health (#2)

We strongly support the following action in the Table of Actions (page 51 on) :

> No 49. Work with Public Health to develop a school superzones pilot that tackles health and air quality in the local area.

[2] Modal filters limit access by certain modes of transport while allowing others, e.g. people walking or cycling access everywhere

Reducing emissions from delivery, servicing and freight (#5)

We are very supportive of all attempts to use cargo bikes for the delivery of freight and have already had a meeting with Logistics at UCL about the use of cargo bikes in their freight consolidation scheme. We have also heard from a small organisation that delivers food from their kitchen on Tavistock Place to their other shop on Store Street using a freight bike.

These discussions have made us aware that access to high-quality cycle routes is a very important aspect of such schemes.

We strongly support the following actions in the Table of Actions (page 48 on):

No 72. Assess the feasibility of using cargo bikes in our own freight consolidation project.

We suggest adding: "Develop incentives for private companies to use cargo bikes" and "provide specialised parking/loading spaces for cargo bikes".

No 80. UCL to assess the feasibility of creating a logistics zone around the Bloomsbury area, consolidating deliveries and reducing vehicle emissions

Reducing Construction Emissions (#6)

We strongly support the following action in the Table of Actions (page 38 on):

No 12. Control construction lorry delivery times to reduce impact on local communities, congestion and air quality.

This is very important when construction sites are close to cycle routes. The procedures in place during the recent reconstruction of Commonwealth Hall in Cartwright Gardens are a good example.

Please acknowledge receipt of this response. We would be very happy to discuss any aspect of our comments; contact details are below.

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