

# Camden Cycling Campaign

21st March 2024

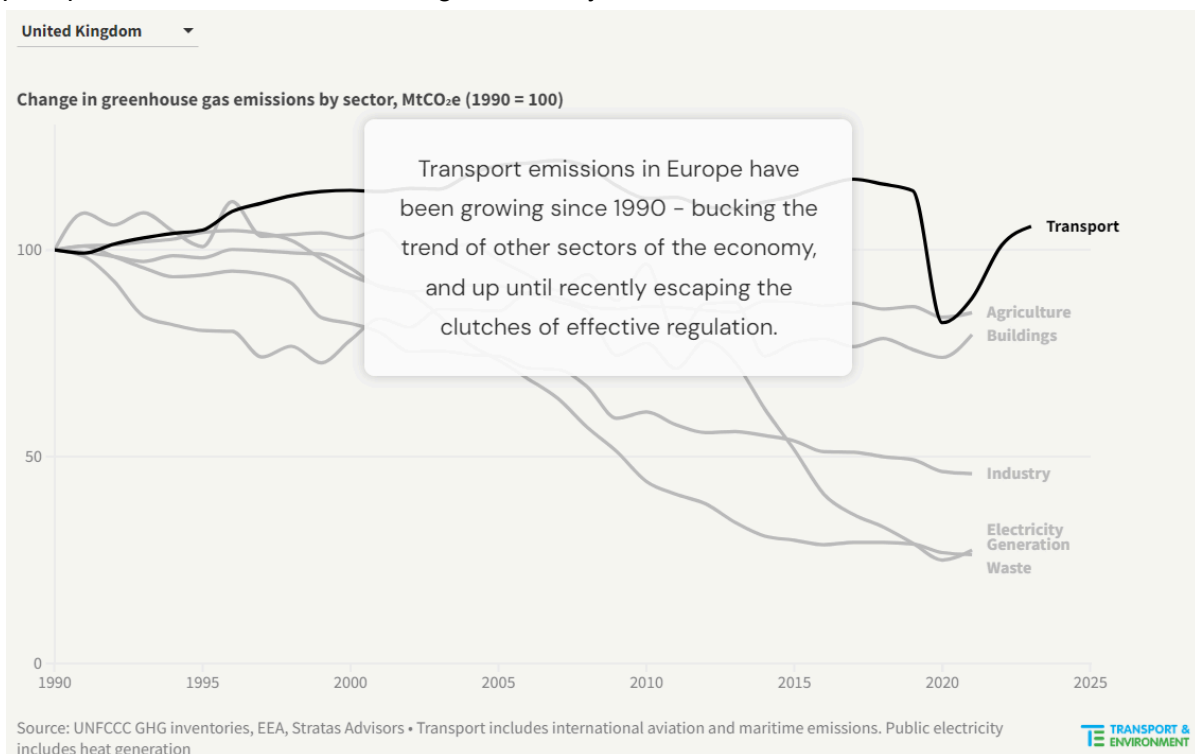
To: [safetravel@camden.gov.uk](mailto:safetravel@camden.gov.uk)

## Summary:

The Camden Freight and Servicing Action Plan (FSAP) outlines ways to address the challenges of air quality, congestion, and emissions from freight deliveries. Some positive points of the plan include reducing the number of motor vehicle freight movements, encouraging the use of cargo bikes and electric vehicles, and promoting deliveries during off-peak times. Overall, the plan aims to make freight and servicing in Camden more efficient, safe, and clean.

Camden Cycling Campaign supports Camden Transport Strategy Objective 7: To ensure economic growth and regeneration is supported by, and supports, a sustainable transport network.

The UK is off track to meet Netzero and the Transport sector greenhouse gas emissions post-pandemic are at the same high level they were in 1990:



<https://transport2024.transportenvironment.org/sot/index.html>

We welcome the statement made by Cllr Harrisson (Cabinet Member for A Sustainable Camden) *"We are committed to further increasing protected space on our main road network, and providing a borough-wide calmer 'secondary cycle route network' so that zero-carbon, non-polluting personal travel is an easy everyday option, not an act of bravery. We are also improving walking and wheeling connectivity throughout the borough. This will help Camden to meet carbon reduction targets."* in response to our Climate Safe Streets Campaign; <https://lcc.org.uk/campaigns/climate-safe-streets-camden/>

Camden Cycling Campaign supports the Targets of FSAP:

- 10% reduction in motor vehicle freight movements in central London by 2026.
- 100% of all new light and heavy goods vehicles driven in London are zero emissions by 2040.
- 0 killed or seriously injured casualties by 2041 (Vision Zero).

However, we question whether the actions proposed in the FSAP are adequate to achieve them. In the next sections below we have highlighted actions that should, we feel, be strengthened.

## Detailed Response:

CCC support many of the short-term actions, in particular:

- Develop an e-cargo training and support scheme for businesses.
- Increase the uptake of FORS and CLOCS.
- Strengthen requirements of, and compliance with Construction Management Plans (CMPs). Expand the conditioning of CMPs, compliance and monitoring.
- Promote the use of local services and trades and service sharing.
- Prioritise planning applications that enable the setting up of micro consolidation centres.
- Expand e-cargo bike sharing schemes in town centres across Camden and re-allocate parking space to them.
- Lobby Central Government to promote better safe driving standards.
- Deliver a new freight consolidation centre with expanded capacity.

We also support The Mayor's Freight and Servicing Action Plan (2019) target of reducing the number of lorries and vans entering central London (which includes the southern part of Camden) in the morning peak by 10% by 2026.

## Constructive Feedback:

The 'Regional Policy' section does not reference the [TfL Cargo Bike Action Plan](#). This is a key policy for unlocking the potential of Cargo bike freight servicing. Some key points of the Action Plan include:

- Behaviour change - By issuing messaging, advice and promotional material, we will provide consistent communication on the benefits of cargo bikes.
- Comfortable turning paths for cargo bikes, lane widths, gradients and physical barriers need to be factored into designs. Our London Cycling Design Standards considers these areas and should be consulted when planning cycle infrastructure.
- We will promote cargo bikes as a preferred mode for those planning Low Traffic Neighbourhoods and borough-led vehicle emissions-based schemes.
- We will further develop the demand model to help us better understand where in London demand for cargo bikes is likely to be highest.
- Micromobility hub - A dedicated area that provides storage space for micromobility vehicles and for handling and storing goods before they are transported. It could be used for one type, for example cargo bikes, or for a range of micromobility vehicles.

- We will continue to work with developers to identify opportunities for short stay parking facilities for cargo bikes.
- We are in the process of reviewing our Constructor's guide (Note: not yet published) to cargo bikes and expanding it to include guidance for other sectors beyond construction. This will be available later this year and advises on procuring and operating cargo bikes, loading and securing cargoes and suggests recommended levels of training for riders.

With consolidation hubs provided over the borough, typical cargo bike journeys will be 'last mile' and use a mix of protected cycle infrastructure and quiet roads (in LTNs) unavailable to other modes.

The standards described in the London Cycling Design Standards and the more recent LTN1/20 are intended to ensure that cycling infrastructure can accommodate all types of non-standard bikes including cargo bikes. It is therefore very important that these standards should be adhered to in building the Camden Cycling Network as well as the filters used in constructing LTNs.

Food delivery workers, Cycle couriers & Cargo delivery riders are overlooked and marginalised. Their needs and protection should be given due consideration in FSAP.

Precarious Employment:

- Zero-hours contracts: Many riders operate on zero-hours contracts, leaving them without guaranteed work and making financial planning difficult.
- Lack of benefits: Riders often lack access to essential benefits like sick pay, holiday pay, and pension contributions.
- Performance pressure: Companies put pressure on riders to make a certain number of deliveries, which can lead to unsafe practices and increase stress.
- Inconsistent income: Riders are often paid per delivery, so their income can fluctuate wildly depending on factors outside their control, such as weather or demand for deliveries.
- The practice of substituting riders, where riders who are not registered/trained are able to make deliveries by borrowing someone else's phone/app.
- Account Renting/Sharing: Underage individuals might use the accounts of older friends/relatives, or rent accounts from others to bypass age verification checks.

Safety Hazards:

- Inadequate infrastructure: Cycling infrastructure in the UK is often car-centric and can be inadequate for the needs of cargo bikes, putting riders at risk of accidents.
- Traffic dangers: Riders share the road with cars, trucks, and buses, increasing the risk of serious collisions.
- Illegal bikes: Bikes that travel too fast (>15.5mph), >200Watts or throttle operated.
- Long work hours: To make ends meet, many riders work long hours, increasing fatigue and the risk of accidents.

The Bicycle Association (UK) is developing a national standard for cargo bike rider training in the UK, alongside UK Codes of Conduct for operators and riders. The aim is to agree on a single national standard and code of conduct, to avoid regional or local duplication. Camden could contribute to these consultations:

<https://www.bicycleassociation.org.uk/download/draft-uk-cargo-bike-rider-and-operator-codes-of-conduct/>

<https://www.bicycleassociation.org.uk/download/draft-uk-cargo-bike-rider-training-standard/>

Steve Prowse, John Chamberlain, Jean Dollimore, George Coulouris  
Camden Cycling Campaign, 1 Estelle Road, London NW3 2JX