

## **M85 Written Statement from Just Space 2718**

### *Cycling*

#### **M85. Is Policy T5 justified and consistent with national policy, and would it be effective in helping to helping to achieve sustainable development?**

Policy T5 has a predominant focus on cycle parking and underrepresents other interventions and infrastructural features necessary to 'normalize' or 'mainstream' cycling as the mode of choice. Cycling is subsumed under the broad goals of Policy T2 Healthy Streets and Table 10.1 of transport schemes only offers very general indications of cost and timescale.

Interim, shorter-term goals are absent whereas national guidance for local cycling and walking 2017<sup>1</sup> expresses a need for improvements identified to be prioritized in phases.

#### **In particular:**

**a) Are all of the requirements of Policy T5 necessary to address the strategic priorities of London, or do they extend to detailed matters that would be more appropriately dealt with through local plans or neighbourhood plans?**

Policy T5 in clause A has two priorities for cycling: a network cycle routes with new routes and improved infrastructure; and the provision of appropriate levels of cycle parking that are fit for purpose, secure and well-located. Not only are these two aspects inadequately addressed in T5, but the policy also omits measures to address other important issues relating to promoting cycling within a context of shift of transport model to sustainable ones.

The policy fails to address spatial differences in central, inner and outer London which is evident in the Mayor's Transport Strategy. The draft new London Plan's Figure 10.2 somewhat arbitrarily highlights certain parts of London for higher minimum cycle parking standards (using existing data for justification). This neglects to acknowledge the potential of most outer London Boroughs to achieve higher rates of cycling. (Only some are mentioned in para10.5.2). This is in a sense contradictory to the Transport Strategy that states that two-thirds of the potential to encourage cycling lies in outer London. In this respect the Plan fails to synergise with the Transport Strategy.

The Healthy Streets approach in terms of cycling is not really articulated in Policy T5 by its focus on routes and parking and not on other aspects to cycling, some of which are raised in the London Cycling Design Standards (LCDS) - safety, directness, comfort, etc. (pp3-10). This document has more to say than simply the single

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<sup>1</sup> [Planning local cycling and walking networks: Technical guidance and tools to help local authorities plan cycling and walking infrastructure, Published 21 April 2017 Department for Transport](#)

reference on cycle space design and layout. Whilst the ‘start’ and ‘end’ points of cycling trips are important in planning for cycle parking, there are broader cycle infrastructure considerations and these require earlier planning and cross-borough collaborations, particularly since it is a London-wide network rather than segments that is to be delivered. There is a need for stronger language to ensure compliance with the LCDS .

That a Minor Modification now acknowledges adapted cycles for disabled persons is welcomed, greater dedication to improving “inclusiveness” and “equity” of cycling should have been demonstrated. Cycle routes should be inclusive to all cyclists of various physical condition, age groups, sex, race and ethnicity. It is evident that there is an unequal distribution of cycling take-up amongst population groups: the proportion of young and elderly cyclists, female cyclists are significantly lower compared to European counterparts, and overall there is a lower take-up by ethnic minorities and by persons with lower incomes<sup>2</sup>. Since the strategic priority of London is Good Growth, one that is inclusive growth and the GG Policies support and promote the creation of an inclusive London etc. (see the emphasis in the Further Minor Suggested Changes M9, for example) the general omission to remedy this is of concern. Consequently, to Just Space, Policy T5 is not addressing the strategic priorities of London.

On the provision of other cycling-related facilities, the recommendation for the installation of supporting facilities for staff in places of employment in para 10.5.7 is not emphatic enough – they should be required in order to help make cycling a desired mode of choice. With the ‘Cycle to Work Scheme’, October 2011, the Department for Transport<sup>3</sup> identified possible barriers to implementation which includes the lack of “suitable parking facilities or somewhere to shower and change” and a “lack of confidence on road/knowing the most appropriate routes”.

In order for cycling to be an effective strategy in achieving active travel and sustainable development the Transport chapter / Policy T5 needed to consider cycling in tandem with walking. This is the national approach (vide the Local Cycling and Walking Infrastructure Plans 2017<sup>4</sup> (LCWIP)). It cannot be assumed that there are no conflicts between cycling and walking strategies when in fact community

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<sup>2</sup> [The Planning for Cycling Document, Chartered Institution of Highways and Transportation](#) (p.4): “Bicycle mode shares in the UK tend to be lower for people from non-white ethnic backgrounds, particularly those from Bangladeshi, Chinese and black African backgrounds; and higher-income households generally cycle more than lower-income households”.

<sup>3</sup> [Cycle to work scheme implementation guidance for employers, 28 October 2011, Department for Transport](#)

<sup>4</sup> [Planning local cycling and walking networks: Technical guidance and tools to help local authorities plan cycling and walking infrastructure, Published 21 April 2017 Department for Transport](#)

groups repeatedly report their concerns around pedestrian safety and problematical walking facilities.

The LCWIP explains that planning for cycling is an iterative process, that implementation should be monitored and the plans periodically reviewed; that while a long-term approach is set out “ideally over a 10-year period”, “infrastructure improvement schemes should be broadly divided into 3 delivery periods: short-term (<3 years), medium-term (<5 years), long-term (typically >5 years)”. Furthermore, it envisaged that LCWIP should be “reviewed and updated ~4-5years to reflect progress made with implementation” (see p.11-12 of LCWIP). This language, particularly for the strategic target of 80% of trips by active travel by 2041, which does not have transitional time-based targets, is not reflected in the Transport chapter / Policy T5.

It is recommended that the Local Cycling and Walking Infrastructure Plans 2017 and its planning toolset be referenced to direct plan-makers.

**b) Are the minimum cycle parking standards set out in Table 10.2 justified?**

Commendable that Table 10.2 has been informed by a reasonably substantial body of research, but the standards have glossed over some key issues around the results of the background studies ([Cycle parking standards supporting evidence report](#) by SKM Colin Buchanan 2013). For example, on distinguishing between ‘long’ and ‘short’ stay, their demarcation and management, how ‘visitors’ are defined for ‘short stay’, particularly for A1 Class Uses, the differing levels of ‘quality’, such as parking site suitability (e.g. proximity, security) raised by Policy clauses B and C. More recently emerging is the potential tension between cycles that are individually owned and bikes for hire, particularly those that do not require dedicated ‘docking stations’.

Furthermore, Table 10.2 applying only to new development does not translate into a holistic framework to encourage cycling generally and, perhaps, could be said to exacerbate social inequality as those who can afford to live/work in newer places will have ready access to better facilities. Following on from the point made in answer to question a), that the equalities dimension around cycling is not addressed contrary to the strategic priorities of the Plan, it is not clear if the research underpinning the parking standards have been informed by considerations of inclusivity, diversity and equality of opportunity.

Cycle parking is not simply a one-off infrastructural strategy. If it is to serve its purpose, there needs to be regular re-assessment, particularly since the minimum parking standards are based on existing data (2013) which will be outdated eventually, if not already.

**c) Should the Plan allow local plans and neighbourhood plans to apply the minimum cycle parking standards flexibly to take account of local evidence?**

The role of local evidence is welcomed and clause AA is supported.