

London Borough of Lewisham – Local Development Framework Core Strategy

Sustrans response

1st April 2010

compiled by Greg King

Sustrans is the UK's leading sustainable transport charity.

- Our vision is a world in which people choose to travel in ways that benefit their health and the environment.
- Our mission is to work everyday on practical and imaginative solutions to the transport challenges affecting us all.

As a sustainable transport charity, our aim is to transform the UK's transport system and culture so that:

- the environmental impacts of transport, including its contribution to climate change and resource depletion, are significantly reduced
- people can choose more often to travel in ways that benefit their health
- people have access to essential local services without the need to use a car
- local streets and public spaces become places for people to enjoy.

In order to achieve this transformation, our objectives are:

- to make local environments safe and more attractive for walking and cycling
- to support and encourage individuals to make more sustainable and healthy travel choices, through motivational and information programmes
- to influence policy and practice by communicating the outcomes of our own work, and the benefits of sustainable and healthy travel, to a wide audience.

Sustrans is the charity behind the award winning National Cycle Network, Safe Routes to Schools, Bike It, TravelSmart, Active Travel, Connect2 and Liveable Neighbourhoods, all projects that are changing our world one mile at a time.

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Introduction

Sustrans welcomes the opportunity to respond to the consultation on Lewisham's Core Strategy Proposed Submission Version.

This document sets out Sustrans' recommended priorities for spatial planning in London. It initially puts forward the case for increasing provision for walking and cycling, based on the economic, quality of life and environmental benefits. It then sets out the initiatives that Sustrans advocates to deliver improved conditions for walking and cycling.

Finally, Sustrans makes a number of comments and recommendations in relation to developing greenways in Lewisham specifically.

Sustrans' submission focuses on how local planning policy can be directed to facilitate a greater uptake of sustainable travel modes. As such, it is likely that there will be some cross-over with borough transport policy and accordingly Sustrans will also participate in consultation on the development of Lewisham's Local Implementation Plan later in 2010.

The case for sustainable transport

This section sets out some of the key reasons to facilitate and encourage a greater uptake of the most sustainable modes of travel - walking and cycling. It describes, in general terms, the economic case, the quality of life case, and the environmental case for seeking to facilitate walking and cycling in local plans.

The economic case

There is now a large body of evidence which makes the economic case for facilitating and encouraging walking and cycling. This is based on the economic benefits that higher levels of walking and cycling can bring in terms of road congestion relief, improving retail vitality, improving productivity, reducing costs associated with treating obesity and related conditions, and tourism revenue.

In 'Valuing the benefits of Cycling' (2007), a report for Cycling England, SQW reported that encouraging more cycling can have a positive impact on congestion, particularly in congested urban areas¹. Since cycling requires several times less road space than motor vehicles, an increase in cycling, where this replaces car journeys, can free-up road capacity.

Investing in infrastructure to promote walking and cycling represents good value for money compared to investment in other transport schemes. Economic analysis of three Links to School schemes by Sustrans' Research and Monitoring Unit (2007), using the Government's own methods of assessing the economic benefits of transport schemes, showed that the benefit-to-cost ratios ranged from 15:1 to 38:1. This represents around ten times better value than traditional, motor traffic focused transport schemes².

Encouraging higher levels of walking and cycling can improve workplace productivity since healthier employees are known to have reduced absenteeism³, lower turnover rates⁴, improved morale⁵ and lower healthcare costs⁶.

Research has found that improving pedestrian environments and restraining motor traffic can improve retail vitality and contribute to regenerating high streets and shopping areas, since shoppers are known to place a high priority on the environmental quality⁷. A study undertaken by Sustrans indicated that for local shopping streets, walking is often the primary mode of customer travel and that people on foot tend to visit more shops. The research also found that shopkeepers frequently underestimate the proportion of their customers that arrive on foot or by bike and significantly overestimate the importance of car-borne trade⁸.

Facilitating leisure cycling and walking can also bring economic benefits through tourism revenue. Recent research by the University of Central Lancashire into the benefits of the National Cycle Network in northeast England showed that where there are high quality routes, cycle tourism can add millions of pounds to a regional economy and support hundreds of jobs⁹. In outer London particularly, where there is potential for developing extensive greenways networks, increased leisure walking and cycling could be a welcome addition to economic activity.

Encouraging more regular walking and cycling can be a key measure in addressing the significant public cost associated with obesity and other conditions linked to inactivity and sedentary lifestyles. The 2007 report, *Tackling Obesities: Future choices*, describes the condition as having reached epidemic levels in the UK¹⁰. In London, more than one fifth of children are classified as obese, with 50 percent of Londoners defined as 'inactive'. NHS London estimates that this inactivity costs £105 million per year¹¹.

The quality of life case

As well as a public economic cost, obesity obviously has a serious personal quality of life cost. It can be a cause of social isolation and depression and is linked to a range of other health problems such as type II diabetes, heart disease, stroke and many forms of cancer.

Whilst the causes of the obesity epidemic are multiple and complex, it is known that physical inactivity is the primary contributor and that the most effective way to tackle obesity is through helping people to walk or cycle more as part of their daily or regular routines¹².

Increasing the walkability/cyclability of the built environment was one of the top five policy responses to obesity in the 2007 Foresight report, and echoed guidance from the National Institute for Health and Clinical Excellence (NICE) about promoting and creating built or natural environments that encourage and support physical activity¹³.

The Chief Medical Officer has said that *"for most people, the easiest and most acceptable forms of physical activity are those that can be incorporated into everyday life"*¹⁴. Walking and cycling for local journeys are accessible and affordable ways for inactive people to incorporate physical activity into their daily routine. Evidence from London suggests that active travel is responsible for significantly more physical activity than other initiatives (such as provision of leisure services) and has a particular strength in terms of overcoming health inequality¹⁵.

Targeted measures to encourage a shift from motorised travel to walking and cycling can also address areas of London which suffer from poor air quality and high levels of traffic noise, both of which can have a detrimental impact on the health of Londoners.

The 2007 Foresight report cites synergies between obesity policy and climate change goals, namely measures to reduce traffic congestion and increase cycling¹⁶. The most significant cause of London's poor air quality is petrol and diesel exhaust fumes from road transport¹⁷, so a lower carbon transport will also improve air quality.

London's green spaces play an important role in both physical and mental wellbeing, as places for physical activity, relaxation and contact with nature¹⁸. Improving access to parks and green spaces can therefore make a valuable contribution to public health.

There is growing body of evidence of the impact of transport policy on social and community wellbeing as well as individuals health. Parents, worried about the threat from traffic, are less inclined to allow their children to play outdoors. Roads with high traffic volumes or speeds deter walking and cycling and frequently create barriers to movement, particularly for the elderly, the young or those with mobility impairments. Speeding traffic and anti-social parking are repeatedly cited as major concerns and fewer people actively present in their streets correlates to increasing fear of crime, especially among more vulnerable people¹⁹.

Numerous studies have shown that lower motor traffic levels are associated with significantly higher levels of social interaction²⁰, and that in urban areas that are conducive to walking, cycling and outdoor play, people are more likely to know their neighbours, participate politically, trust others and be socially engaged. By prioritising walking and cycling over private car use within urban areas, transport policy can make a vital contribution to social cohesion, neighbourhood revitalisation and community well-being.

The environmental case

London is responsible for eight per cent of UK carbon dioxide emissions, producing 44 million tonnes of CO₂ each year, with a substantial proportion of this (22 per cent) coming from road transport²¹. Unless action is taken, London's overall emissions are projected to increase substantially, by 15 per cent to 51 million tonnes by 2025²².

Swift and decisive action to reduce greenhouse gas emissions globally is now needed to prevent catastrophic climate change²³. The urgency of reducing emissions, including putting in place low and zero carbon transport solutions, is informed by the ever-increasing scientific literature on climate change, and the moral imperative of adopting a precautionary approach, considering the potential impacts of untrammelled climate change.

Whilst many of the severest impacts of climate change will be felt first and hardest in developing countries, London is acutely vulnerable to the dangers of climate change, particularly in the medium and longer term. This is anticipated to include an increasing risk of flooding – both tidal and fluvial, droughts and more frequent, severe and damaging heatwaves²⁴.

Walking and Cycling are obviously carbon neutral forms of transport and a shift to these modes from car travel can contribute to delivery of carbon dioxide emission reduction targets.

A transport system that is more efficient and less dependent on fossil fuels is less exposed to rises and volatility in global oil prices. In this respect a shift to sustainable modes of travel makes the local transport system - and thus local economies – more energy secure and resilient.

Key measures to deliver sustainable transport

This section sets out the key ways in which Sustrans believes the local planning policy should seek to make transport more sustainable and facilitate an uptake of walking and cycling.

Reducing the need to travel

Sustrans believes that a key role of spatial planning policy is seeking to reduce people's need to travel, especially by car. Integrating transport and land use planning and shaping the pattern of development to influence the location, scale, density, design and mix of land uses is hugely important. Reducing the need to travel and the length of journeys will be beneficial individually and collectively, by tackling congestion and overcrowding and reducing the impact of travel on people's lives.

Particularly over the longer term, as London's population is set to grow, perhaps the best option - environmentally and economically - is simply to reduce the need for people to travel longer distances.

By using spatial planning policy to influence development locally and reduce journey lengths, the most sustainable modes of travel - walking and cycling - become viable for more local journeys.

Developing a good quality network of greenways

Greenways are safe, quiet routes which connect residential areas to parks and green spaces and interlink with other route networks. They are for use by pedestrians, cyclists, wheelchair users and others who feel vulnerable on or near busy roads, for recreational or practical journeys.

Cycling is still a minority activity in the capital, with most Londoners never getting on a bike²⁵. The most significant deterrent to cycling is fear of traffic; over two-thirds of Londoners do not think that cycling is a safe way to travel around London²⁶. Despite this, research also shows that for a large proportion of non-cyclists, cycling does have an appeal from an environmental, health and enjoyment point of view. About 90 percent of Londoners think that it is healthy and good for the environment and over three-quarters agree that cycling is enjoyable²⁷. Because greenways respond to both people's concerns about the safety of cycling in traffic and the positive perceptions of cycling as a healthy, fun activity they are key in facilitating a greater uptake of cycling. In Outer London particularly, where levels of cycling are currently low, but where there is a wealth of green spaces, greenways could play a central role in encouraging new people onto their bikes.

Greenways not only improve conditions for cycling but generally improve accessible linkages between green infrastructure and the wider public realm, which is beneficial to all, including pedestrians and people with limited mobility.

The development of greenways in London is now an established programme of work, carried out by Sustrans in partnership with Transport for London, the London Boroughs and many other agencies. To date, greenway networks have been identified across almost all London boroughs for development and promotion over the coming years. These networks have undergone consultation with thousands of groups and individuals and their delivery has been prioritised by managing authorities.

Developing greenways is recognised as a London Mayoral priority for encouraging cycling in the capital:

"The Mayor, through TfL, and working with the boroughs and other stakeholders, will deliver improvements to cycling infrastructure and training to support the cycling revolution, including:...

c) Enhanced cycle links to the Olympic Park by 2012 and the development of a wider network of Greenways across London..." (Proposal No. 53 of the draft Mayor's Transport Strategy)

NOTE: the final section of this submission includes specific recommendations for greenways developments in the area.

Better streets through traffic reduction and reallocating road space

A key determinant of the quality of the built environment and the appeal of an urban area for active travel is the level of traffic. Guidance, including Manual for Streets (DfT, 2007) and the London Cycling Design Standards (TfL, 2005), promotes traffic volume reduction measures as the first priority in seeking to facilitate more walking and cycling.

As noted above, there is a growing body of evidence of the impact of transport and planning policy on social and community well-being as well as individuals health. Numerous studies have shown that lower motor traffic levels are associated with significantly higher levels of social interaction²⁸, and that in urban areas that are conducive to walking, cycling and outdoor play, people are more likely to know their neighbours, participate politically, trust others and be socially engaged.

To reduce motorised traffic volumes in specific locations, particularly residential areas and on strategic active travel routes, Sustrans advocates 'filtered permeability'. This promotes the use of modal traffic gates and 'point-no-entries' in appropriate locations to limit permeability for private motorised traffic and thereby reduce traffic levels in target areas, whilst allowing full permeability to active travel modes.

This approach is supported by the Mayor of London in the draft Mayor's Transport Strategy (2009):

"The Mayor...will improve the walking experience by enhancing the urban realm and taking focused action to ensure safe, comfortable and attractive walking conditions, including:...
g) Seeking to manage car access to residential areas, through physical or design measures, to create pleasant and safer walking environments" (Proposal No.59 of the draft Mayor's Transport Strategy)

Whilst implementing measures to reduce traffic levels is a key policy for improving walking and cycling conditions on residential and retail streets, Sustrans believes that other policies are needed on arterial routes.

Looking at cycling specifically, Sustrans believes that to provide a good quality cycling environment on busier distributor roads there is frequently no adequate alternative to providing dedicated cycling space. This usually requires the reallocation of road space from motorised vehicles.

A good example is the recent highway alterations on Blackfriars Bridge. The removal of a general traffic lane enabled the provision of good quality cycle lanes, which delivered significant safety improvements. Additionally, it allowed for the pavement to be widened, thus improving the pedestrian experience.

Road space re-allocation measures include: introducing traffic-free transport corridors for cycling and walking; introducing priority lanes for cyclists and public transport; pavement widening; intersection treatments to improve safety for cyclists, as well as pedestrians; parking restrictions and enforcement and raised crossings. Generally, these measures all aim to make access by sustainable and public transport choices simpler and more convenient than access by car.

This approach is supported by public health advocates. In 2007, the National Institute for Health and Clinical Excellence (NICE) issued guidance on physical activity and the environment which offered

national evidence-based recommendations on how to improve the physical environment to encourage physical activity. This includes measures to re-allocate road space to active travel modes.

Expansion of 20mph speed limits

In addition to traffic volumes, traffic speed is a key determinant of the appeal of an urban environment for walking and cycling. Reducing the speed of traffic is noted as the second priority for improving streets in both *Manual for Streets* (DfT, 2007) and the *London Cycling Design Standards* (2005).

Sustrans believes that local planning and transport policy should reflect this principle by providing guidance on speed limit policy locally, including promoting the expansion of 20mph speed limits. Sustrans supports the recommendation of the London Assembly in the report, *Braking Point: 20mph Speed Limits in London*, that advocates borough-wide speed limit reductions on residential streets²⁹.

As well as increasing the appeal of walking and cycling³⁰, the wider introduction of 20mph speed limits on residential streets has a clear road safety benefit. A number of recent reports have shown the very significant role of traffic speed in the incidence and severity of road traffic collisions, particularly involving pedestrians and cyclists.

Recent analysis of cycle deaths in London found that virtually all fatal collisions occurred on roads with a speed limit of 30mph or higher³¹. The study also found that the introduction of 20mph limits on residential roads could produce a 50 percent reduction in pedal cyclist killed and seriously injured casualties³².

Further research, recently published by the *British Medical Journal*, found that the introduction of 20mph zones in London over the last two decades have significantly improved road safety for users of all modes. This is especially true for children and young people, with the number of 0 – 15 year olds being killed and seriously injured reducing by half in areas where the speed limit is reduced to 20mph³³.

Cycle parking and car parking policy

Whether or not people can safely store a bicycle at home and lock it securely at their destinations is a significant determinant of whether they cycle. Sustrans advocates provision of quality cycle parking at all key destinations and using the planning system to ensure cycle parking is provided in new developments. Sustrans recommends that for new housing developments, 2 secure cycle storage places should be provided for the first bedroom in each dwelling, following by 1 extra space per additional bedroom thereafter.

Another key way that spatial planning can influence transport modal choice is policy relating to car parking provision. As is set out in *Manual for Streets* (2007), “*The availability of car parking is a major determinant of travel mode*”. Accordingly, Sustrans believes that Local Development Frameworks should set out clearly the importance of car parking provision level in achieving objectives in relation to active travel, public health and congestion relief.

Whilst the appropriate level of car parking provision must be based on local circumstances, Sustrans believes that all developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit. Further to this, Sustrans believes that LDFs should promote, where appropriate, the provision of car-free developments.

‘Carfree development’, a design concept which originated in Germany and Austria in the early 1990s, incorporates a traffic-free residential environment which is designed around movement by non-car means.

There are now numerous neighbourhoods on mainland Europe, designed as car-free. They deliver economic benefits, by requiring less land for car parking and thereby allowing the construction of more dwellings for any given area. The lower levels of car trips associated with car-free developments contributes to congestion relief.

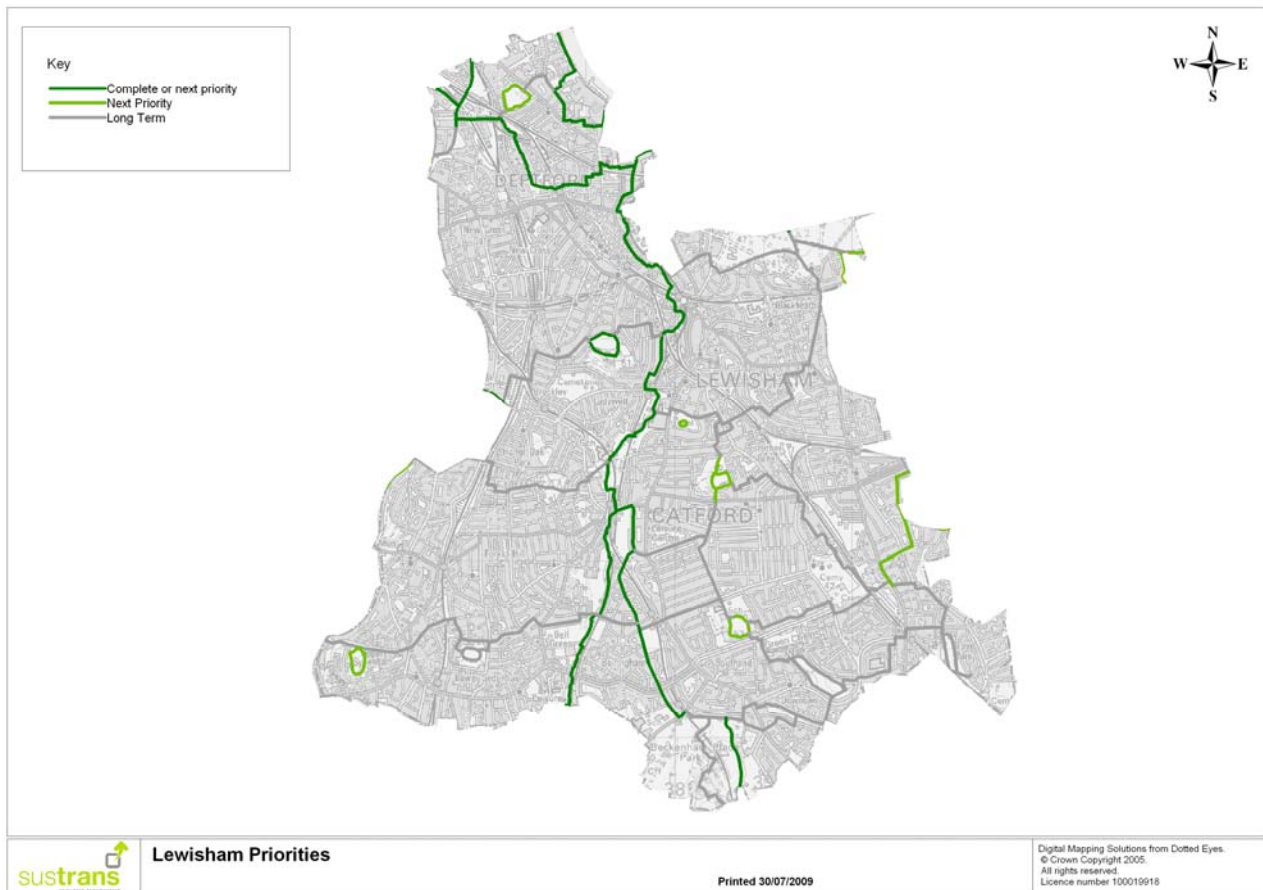
Given the low levels of car ownership in London, relative to the rest of the UK, the high levels of public transport accessibility, as well as the improving provision of cycle infrastructure, Sustrans believes that car-free developments should be promoted in the capital.

Recommendations for local greenway developments

Sustrans has been working in partnership with LB Lewisham since 2008/9 to develop a network of greenways walking and cycling routes in the borough, a full definition of greenways is given on page 7 of this response. The priority links on the network have been identified, a map of which is included below.

The objectives of Core Strategy Objective 9 are welcome, in particular 5.13a – ‘provides for a system of walking and cycling routes and strong links to town centres and public open space, including the Waterlink Way.’ This is in essence the aim of the greenways network in the borough, and Sustrans feels it would be appropriate to give specific reference given to this project. The borough’s greenways network forms part of a pan London network of routes, linking into neighbouring boroughs, and can also therefore assist with meeting the following objective – ‘improve integration, accessibility and connectivity within the borough and the London sub-region.’

The priority links on the Greenways network are the Waterlink Way and National Cycle Network Route 4 (The Thames Cycle Route). It is therefore very welcome to see reference to the Waterlink Way in the document. Convoys Wharf remains a major missing link on Route 4, and the redevelopment of the site to include a path along ‘the river front or as near as practicable given the protected wharf area’ is strongly supported.



¹ Valuing the Benefits of Cycling, SQW for Cycling England, May 2007.

² Economic Appraisal of Walking and Cycling Routes, Sustrans, October 2006.

³ Relationship between frequency of aerobic activity and illness related absenteeism.. Journal of Occupational Medicine, 2001.

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- ⁴ Relationship of employee turnover to exercise adherence in a corporate fitness program, *Journal of Occupational Medicine*, 1987,
- ⁵ Physical activity and work performance: Results from the national worker fitness test 2000 in the Netherlands, *Medecine and Science in Sports and Exercise*, 34, 2002.
- ⁶ The relationship between modifiable health risk factors and health care expenditure: An analysis of the multi-employer HERO health risk and cost database, *Journal of Occupational and Environmental Medicine*, 40, 1998.
- ⁷ Traffic Restraint and Retail Vitality, *Sustrans*, 2003.
- ⁸ Shoppers and how they travel, *Sustrans*, 2006.
- ⁹ The Economic Impact of Cycle Tourism in North East England – Executive Summary, University of Central Lancashire, 2007.
- ¹⁰ Foresight, *Tackling Obesities: Future Choices*, Government Office for Science, 2007.
- ¹¹ Mayor and Sports Commissioner outline bright future for sport in London (press release), Mayor of London, April 2009.
- ¹² Adrian Davis, presentation at Smart Moves Conference, London, April 2009.
- ¹³ Promoting and creating built or natural environments that encourage and support physical activity, National Institute for Clinical Excellence, 2007.
- ¹⁴ At least five a week: Evidence on the impact of physical activity and its relationship to health – A report from the Chief Medical Officer, Department of Health, 2004.
- ¹⁵ Reducing Health Inequalities – issues for London and priorities for action, Mayor of London, 2007.
- ¹⁶ Tackling Obesities: Future Choices – Summary of Key Messages, Foresight, Government Office for Science, October 2007.
- ¹⁷ The Mayor's Air Quality Strategy, Mayor of London, September 2002.
- ¹⁸ Improving Londoners Access to Nature, Mayor of London, February 2008.
- ¹⁹ The British Crime Survey 2003/04, Home Office, 2004.
- ²⁰ including, *Livable Streets*, Donald Appleyard, University of California Press, 1981
- ²¹ The Mayor's Climate Change Action Plan, Mayor of London, February 2007.
- ²² The Mayor's Climate Change Action Plan, Mayor of London, February 2007.
- ²³ *Climate Change 2007 – Synthesis Report*, Inter-Governmental Panel on Climate Change, 2007.
- ²⁴ The London Climate Change Adaptation Strategy, Mayor of London, August 2008.
- ²⁵ *Cycling in London*, Transport for London, October 2008.
- ²⁶ *Cycling in London*, Transport for London, October 2008.
- ²⁷ *London Travel Report 2007*, Transport for London, 2008.
- ²⁸ including, *Livable Streets*, Donald Appleyard, University of California Press, 1981
- ²⁹ *Breaking point: 20mph speed limits in London*, London Assembly, April 2009.
- ³⁰ *London Cycling Design Standards*, Transport for London, 2005.
- ³¹ Analysis of police collision files for pedal cyclist fatalities in London, 2001 – 2006.
- ³² Analysis of police collision files for pedal cyclist fatalities in London, 2001 – 2006.
- ³³ Effect of 20 mph traffic speed zones on road injuries in London, 1986-2006: controlled interrupted time series analysis, Grundy et al, *British Medical Journal*, Sep 2009.