

## Lewisham Cyclists response to Lewisham Air Quality Action Plan.

05 September 2021

### About Lewisham Cyclists

Lewisham Cyclists (LC) are the local borough group of the London Cycling Campaign (LCC) with more than 2500 supporters of whom over 700 are fully paid-up members of LCC. We speak up on behalf of everyone who cycles or wants to cycle in the London Borough of Lewisham and its adjacent local parks; and we speak up for a greener, healthier, happier and better-connected capital.

### General comments on Lewisham Air Quality Action Plan 2022-2027

We welcome the publication of an updated Air Quality Action Plan and share with the council their goal to improve air quality in the borough and address the climate emergency. We appreciate the recent work the council have done in promoting walking and cycling, enforcing anti-idling, implementing school streets across the borough, and rolling out their first Low Traffic Neighbourhood.

Unfortunately, the lack of progress in safe cycling infrastructure, with only 300 metres of new segregated cycle lanes being built on council roads since 2016, pales in comparison with neighbouring boroughs. Lewisham is now well behind comparable Boroughs that have successfully enabled significant improvements in cycle lanes, traffic filters, contraflows and hangers, all of which are essential facilities to enable residents to make more sustainable active travel choices. We would also like the council to urgently address the long waiting list for secure parking space in cycle hangars. This is currently reflected in the Healthy Streets Scorecard, where [Lewisham is ranked as one of the worst boroughs in Inner London overall](#).

### Comments on the Lewisham Air Quality Priorities for 2022-2027

Priority 3 (“Expanding the Council’s Sustainable Transport Infrastructure”) says “LBL is prioritising the reduction of emissions from road traffic and to that end supports the necessary infrastructure required to support the uptake of ultra-low emission vehicles, and also to facilitate cycling, walking and the use of public transport”.

We believe the order is incorrect as the council should enable active travel (walking and cycling) as first priority, followed by sustainable public transport, and then ultra-low emissions / electric vehicles last when other means of transportation are not available or feasible. Although the

focus of this document is air quality, the council shouldn't forget broader issues caused by motor vehicles such as inactivity, congestion, and road safety as well as inequality. Various urban transport studies have conclusively shown that active travel investments are the best value investment, in terms of relatively modest cost, for significant benefits including physical and mental health, reducing congestion and pollution for a fraction of the costs associated with public transport and highways infrastructure.

Where the Council chooses to support the uptake of ultra-low emission vehicles we believe that it should be focusing much more on the prioritisation of smaller shared-use low emission vehicles. There is a clear need to reduce the number of vehicles parked across the borough thereby releasing essential road space for wider pavements and improved cycling infrastructure.

The document also states "consideration of non-obstruction of pedestrian pathways and pathways for wheelchairs will be considered during the design of electric vehicle charging points".

We would like to highlight that charging points have recently been installed on Lewisham pavements in locations where ample carriageway space was available, reducing the amount of space for pedestrians, wheelchair users and others with limited mobility.

## Comments on the Action Plan Table

[We urge the council to adopt the updated 2021 World Health Organisation Air Quality guidelines as recently set out.](#) We believe this is crucial in order for the council to meet a number of the stated aims as set out in both this draft plan and also the Council Climate Emergency Action Plan.

Emissions from developments and buildings #6: the K.P.I says "Numbers of proposals or projects where green infrastructure is used or enhanced to provide low exposure walking and cycling routes". There is no mention of secure cycle parking and adherence to the London or Local Plan (id 9.1 has a target for charging points). We believe new developments are an opportunity to create new walking and cycling routes or improve existing ones, but needs to be done as part of an integral plan to avoid a piecemeal or "tokenistic" approach.

Delivery servicing and freight: the document doesn't mention electric cargo bikes and we urge the Council to use their existing contracts and frameworks to enable zero emissions cargo bike operations from Logistics Providers currently providing services in neighbouring boroughs.

Lewisham Cyclists understands that some existing underutilized facilities within its own estate, or those of partners, could be adapted to allow logistics providers to set up last-mile Delivery Hubs for cargo bikes.

As an example of best practice [Waltham Forest](#) set up a [Zero Emission Delivery](#) service in 2016 with funding from the Mayor's Air Quality Fund. A similar service in Lewisham would not only enable sustainable and quick deliveries within Lewisham but also bring green jobs to our borough.

No specific provision has been made for parking of electric cargo bikes. Lewisham Cyclists are calling upon the council to use their existing contracts and frameworks to provide more on carriageway residential cycle parking for both regular cycles and cargo bikes. This should be funded through a number of different funding streams such as LIP, NCIL, S106 agreements, existing Highways Budget including income from parking revenues and also Capital spend. Another example of recent best practice has been [seen in Hackney, Islington and Tower Hamlets, who are rolling out a cargo bike hire schemes for their residents.](#)

Borough fleet actions: there is no mention of bicycles or cargo e-bikes. Incentives for the transition from motor vehicles to (electric) bikes could be established. Monitoring the mileage of the vehicles should also include the electric or low emission fleet so unnecessary trips are avoided.

Localised solutions (#18) mentions promotion of walking and cycling in the context of green spaces. We believe there is scope for more ambition to make green spaces safely accessible for walking and cycling with wider paths and better connectivity to existing infrastructure. Targets should be in line with those set out in the council's own Transport Strategy, Parks and Open Spaces Strategy and Borough Cycle Strategy.

We would also ask the council to deliver on its targets set out in Vision Zero by also reconsidering the decision to not pursue FORS Gold Accreditation (Table B1) for its own Council fleet operations. We believe that fleet operations should be following the best practice available in order to meet Vision Zero aims as set out in the Council's own Transport and Cycle Strategies.

Cleaner transport: infrastructure (#22.1 and #25): we call the council upon setting up specific targets that can be measured in terms of infrastructure built to LTN1/20 standards. . The target for #25.2, one cycling hangar per ward is extremely low considering the lengthy waiting list and lack of secure parking being one of the major factors preventing people from cycling. Again as a reference Waltham Forest included a target of installing 8 cycle hubs in their borough, next to stations.

We would also like the council to negotiate with TfL to bring the Santander Bike hire scheme to the Borough to provide active travel connectivity to new developments like Convoys Wharf, Deptford Timberyard, Lewisham Gateway, the Catford Masterplan and new developments along the A21 Corridor as detailed in the A21 Framework.

## Overall conclusions

To sum up, we appreciate the council's ambition to improve the air quality in the borough but we are concerned that it relies much too heavily on the electrification of private motor vehicles which brings unwanted concerns on sustainability, affordability, taxation, and parking while not resolving structural issues related to road safety, congestion, and inactivity.

We would demand the Council to re-prioritise active travel as the proven solution to improve air quality and bring other benefits, and leverage innovations such as electric (cargo) bikes aligning with the London Mayor and Transport for London policies to garner maximum support.