Friends of the Earth

Camden Friends of the Earth

Answer to the consultation on Camden's Transport Strategy [CTS]

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We are writing to welcome and support the draft Camden Transport Strategy. We are especially pleased to read that walking, cycling and public transport are at the heart of Camden's strategy (5.2 p69). It is also good to read that Camden has elaborated a hierarchy of modes (5.23 p73), putting buses and deliveries before taxis, and keeping private cars and parking at last. That's a very good starting point. However, we noticed a range of issues in the document which we would like to see addressed.

Air Quality

On improving air quality (3.50 p46) a detailed breakdown of road emissions per vehicle type would be helpful to support a statement made later on in the CTS (5.28 p73) about the "disproportionate impact of taxis on air quality". Our own analysis of London Atmospheric Emissions Inventory (LAEI) shows that in 2008, **taxis accounted for 16% of PM2.5 emissions from road traffic in Camden**. Looking at Bloomsbury, Holborn and St Pancras, the figure rises to **30%.**

The word "clean" is used between brackets (5.189 p100) to qualify vehicles using alternative technologies. We suggest using another word (e.g. zero tailpipe emission) since any kind of motor-vehicle has a considerable environmental impact throughout their life cycle (construction, fuel production and vehicle recycling). Even in the best case scenario, when fuel is derived from waste or from renewable energy sources, manufacturing a vehicle is a heavy industrial process. According to the 2006 Life Cycle Assessment of Vehicle Fuels and Technologies, one could say that the purchase of a new vehicle releases as much CO2 as driving 25,000 km with an old car. That's assuming a manufacturing and retail footprint of 5t CO2 compared to driving an existing

car emitting 200g CO2/km (well to wheel). Alternative authors would estimate the carbon footprint of the industrial process at a much higher level: 7.2 t CO2 per £10,000 spent (source: *How Bad Are Bananas? The Carbon Footprint of Everything* by Mike Berners-Lee quoted in *Guardian* in sept. 2010).
We would not support the council insinuate that motor vehicles can become clean and everyone can carry on with their life-styles. That's a message we expect to hear from conservative Councils only.

Still concerning air quality, we believe the CTS should make it clear that the estimated 3000 premature death (3.49 p46) are related to particulate matter (PM) only. The total death toll related to poor air quality is likely to be higher. Such figures should be better explained because they support action towards reducing emissions from transport. They are the foundations of a progressive policy and should be shared with the public. We are looking forward to discovering how many Londoners are suffering from chronic disease directly related to pollution. Finally, on a more financial perspective, how many work-days are lost because of this plague?

However, we must here warn the Council **against the temptation to smooth up traffic flows** across the road network:

- The statement that emissions can be reduced when average speeds are higher (3.55 p48) is a populist myth, as explained in the comments on the SEA scoping report, sent by Camden Friends of the Earth on 8 Sept. 2010. The myth is broken by the natural increase in traffic flows which occurs when average speeds are rising. Consequently, smoothing up traffic flows not only worsen pollution, but also worsen the traditional range of problems associated with motor vehicles: accidents, obesity, etc.
- The support to the pedestrian countdown (5.89 p84) is also a dangerous strategy. We have evidence that TfL is using this technique in order to allocate more "green light time" to traffic against pedestrian movements. This would consequently offer more capacity for traffic volumes to increase, and would further sever communities living along busy roads. This would also further reduce attractiveness and accessibility of streets as explained in 3.94 p59.

Traffic figures
We are surprised to see that the level of road traffic is not amongst the proposed set of performance indicators (E6.1). Instead, the CTS suggests measuring the resident's share of car trips, which is far from enough to monitor all the traffic Camden residents are suffering from: motorised visitors, white vans, deliveries, taxis, etc. What gets measured gets managed. In that case, little will be achieved in reducing traffic levels in Camden. We wonder why the traditional four Camden **screenline counts** (2.72 p27) are not mentioned. They have been a key measure of success for the Council since 2001. Are they being cut?
We are also surprised to read (3.104 p61) that road transport is responsible for 15% of CO2 emissions in Camden. This seems to contradict the figures given in the sustainability plan, where transport is said to represent 10% of Camden territorial CO2 emissions (source DECC). Unless some clarification is given, the Council risks loosing some credit.

Cycling

We do not share the belief that dedicated lanes are the best solution for cyclists (5.129 p89). Such a solution is expensive, often unfriendly to pedestrians, following over-engineered segregation principles. It also makes the general public believe that there is no space for cyclists on the narrow London road network. Debate during the last Green Summit has shown that members of the public do not believe in (or support) a rising cycling trend because they do not see where to fit cycle lanes.

Beginners appreciate the feeling of safety provided by some form of separation, and we would be delighted to see some new routes being planned. However, other cyclists are mostly looking for streets where traffic levels are lower and vehicles keep moderate speeds. Safety benefits from traffic calming could be equal to or higher than benefits from cycle lanes/tracks. We suggest that Camden promotes traffic calming, naked and shared streets at this stage of the CTS, showing that cyclists do not necessarily demand a dedicated stripe of the precious public space.

The CTS mentions the need for **two-way bicycle traffic** (5.132 p90). We fully support this policy. Over-engineered one-way systems are encouraging drivers to speed up and pay little attention to potential dangers. To our answer to the draft CTS, we attach a very appropriate column that Stephen Bayley wrote in *The Times* in April 2010: *End one-way streets – that's the way forward.*

We consider there is a gap in the CTS regarding residential cycle parking (5.112 p87). We understand the high cost of a public intervention in this field. However, while engaging with businesses, the Council could propose a brainstorming on the issue. Would the private sector be willing to trade some of their storage space / accommodate residents bicycles in empty basement car parks / welcome cycle stands in front of 24/7 corner shops?

Accessibility

We would like Camden to acknowledge that the London **bus network is poorly accessible** compared to European standards. In physical terms, this is due to bus stop and platform design (as stated in 3.94 p59) as well as driver behaviour and training (not mentioned in the CTS). In physchological terms, we would attract your attention on the excruciating beep announcing the arrival of a wheelchair user. Addressing the accessibility of buses is more important than it seems. As long as taxi drivers can claim they are the only door-to-door accessible form of public transport, both the Council and the Mayor will have difficulties imposing new constraints on them.

Noise

We would also appreciate to see Camden acknowledge the excessive amount of noise generated by **emergency vehicles** (3.58 p48 or 5.55 p77). The present situation, where alarms seem to be louder than anywhere else in Europe, is having a disproportionate impact on the

health of residents and possibly deterring people from enjoying a pleasant walk. Would the Council rely less on mathematical models, and more on real-life noise data collection, the burden of emergency vehicles would be far more obvious. It is appalling to read about the noise allegedly caused by speed humps when emergency vehicles are ignored. Does this reflect a political focus drifting away from the most deprived areas of the Borough, Somer's Town for instance? We encourage the Council to correct this omission and to urgently engage with appropriate stakeholders.
In particular, we wonder whether the Council is engaging with emergency services on the rising concept of filtered permeability whereby a street is blocked to through-traffic but remains a convenient shortcut to pedestrians and cyclists. Would the Council publicise a willingness to further implement this concept, emergency services would understand the need to invest in bicycles rather than in new sports cars. We are pleased to see police forces and first aid NHS staff already on bicycles. They beat any other mode of transport when their intervention is required in parks and pedestrianised areas, within congested districts.

Shall we support cleaner vehicles?
We are pleased that the CTS recognises the limits of cleaner vehicles (5.37 p74). Also, the Council should review its transport policies and consider whether **subsidies to cleaner vehicles** are delivering value for money. Considering their devastating impact on obesity, casualties and congestion, amongst a list of other externalities, shall we support these technologies with taxpayers' money?

Obesity
We would like to see the obesity issue mentioned in paragraph 3.2 (p35).
We invite the Council's political and technical staff to read *The Energy Glut* from Ian Roberts, professor of public health at the London School of Hygiene and Tropical Medecine. The book explains why the transport system is making people obese, more than anything else.
Professor Philip James, chairman of the International Obesity Task Force, also believes that obesity is not going to be fixed by a healthier diet. He estimates that obesity would cost the NHS £20 billion per annum by 2025. [timesonline.co.uk] [express.co.uk]
Considering the gravity of this issue, and knowing that deprived populations are the most badly hit, we believe the CTS should put more emphasis on obesity and its causes within the transport system.

Traffic calming
With respect to traffic calming [Policies 3.1 3.2 and 3.4 pp 104-108], the CTS is excessively timid in its orientations. The Council will "explore" the "possibility" of taking long-awaited measures such as 20-zones. Many reasons are mentioned in order to delay the wide scale roll out of traffic calming measures: their cost, their acceptability, their noise, etc. On the field however, we noticed numerous successful examples of traffic calming measures across the borough, from simple speed humps to filtered permeability, raised tables, 20 zones, etc.

Camden should simply accelerate the changes in street-scape, based on this successful experience. A blanket 20mph limit is the way forward. In practical terms, this could begin with some signage, but needs to be supported by **physical traffic calming**.

We would like the CTS to emphasize that physical constraints such a speed tables not only improve the crossing conditions for all pedestrians but also are the only self-enforced solution to prevent all vehicles from speeding and terrorizing communities. 20mph signs and speeding tickets have little impact on the most aggressive drivers and the police doesn't seem to care much about it. Speed tables should be mentioned in 6.35 p163.

Taking the speed problem seriously, we are asking the Council to set up an additional **dedicated target**. It wouldn't consider average speed but instead look at the top end of the distribution e.g. the 90th percentile. This is really what matters for cyclists and pedestrian to feel safe in their neighbourhoods. The design of an affordable meaningful data collection strategy would be challenging but we would be ready to help.

Finally, we believe that road space should be further re-allocated to public transport, cycling and walking. Pedestrianisation of space has been very rare in London, although usually successful. This principle should be listed along with other techniques in order to achieve Objective 5.

Parking

The draft CTS looks rather superficial on parking issues, although parking is believed to be one of the most powerful keys to better manage the whole transport system. The emissions based system seems to be diverting attention towards cleaner vehicles, away from fundamental problems caused by car travel. The CTS doesn't quite consider parking charges as a way to deter car ownership. Consequently, the predicted number of car clubs bays remains very modest with 330 bays by 2020.

Also, we consider that free on-street parking over the weekends is an incentive for many residents and visitors to use their cars. As a consequence, Camden residents never really enjoy a drop in traffic levels. Air and noise pollution are noticeable 7 days a week.

We believe that Camden should look into the real market value (p139) of parking bays and potentially **adjust to higher charges**. Why providing a subsidy to car ownership, which wastes acres of the surface of the Borough and contributes to obesity and numerous other costs to the society?

Finally, considering the great public transport system in Camden, and considering its cost, we fully support a **workplace parking levy**. However, in order to make the scheme acceptable by the general public, the CTS should lay strong foundations for the scheme. This would help prevent a public backlash, often observed when parking conditions are amended.

Immediate focus

To finish with, we would like to repeat our key concerns:

1. Camden must implement a blanket 20mph speed limit on Borough roads, self enforced by a steadily growing number of speed tables and raised crossings (amongst other traffic calming tools)
2. The Council should explicitly stop supporting populist myths such as the "clean car for

all" and the "lower emissions from smoother traffic flows". Lifestyles *have* to change, step by step, towards alternative modes of travel and vibrant local neighbourhoods.

3. The strategy should plan for a legitimate steep increase in residential parking charges and for a workplace parking levy.

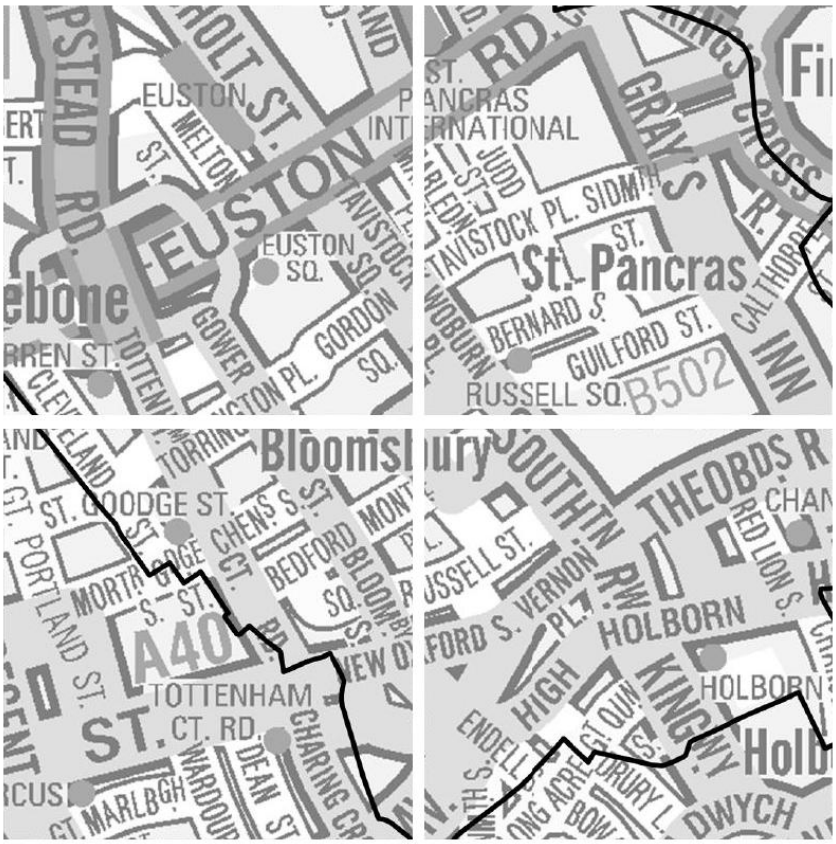
We look forward to hearing from you on how Camden Council are evaluating and following up all suggestions, and how we may best help Camden develop and implement the new transport strategy.

Kind regards

Alexandre Santacreu, Susan Poupard & Jess Gold
Camden Friends of the Earth

Appendix 1. Share of taxi emissions amongst road emissions in 2008
(derived from LAEI 2008 by FoE Camden)

Pollutant	London	Camden	Bloomsbury Holborn St. Pancras
CO2	3%	7%	14%
PM10	6%	14%	27%
PM2.5	7%	16%	30%



Definition of the four grid cells (1 km2 each) used by Friends of the Earth to describe South Camden atmospheric emissions from the LAEI grid data.

Appendix 2. End one-way streets – that's the way forward

By Stephen Bayley, The Times, April 14, 2010

It is the end of the road for the detested one-way street. Transport for London, perhaps the biggest manager of one-way systems in the world, at last acknowledges a truth painfully proved by harrowed pedestrians, bruised bicyclists and infuriated drivers: one-way systems do not work. Cities have been wastefully sacrificed to the false gods of efficiency and rationality. Now we want our cities back.

After a consultation in 2006 Tottenham Court Road — and soon Piccadilly, Pall Mall, Gower Street and the notorious Wandsworth one-way system (a congealed eternity of hot metal and annoyed people) — will return to two-way traffic. So a ruinous experiment is under final notice after 50 years of fuming. A culture that thought speed a measure of success and volume a measure of prosperity is being driven down the off-ramp.

This is a powerful metaphor for the new, more liberal, reasonable, responsible, lightly governed future that we are told awaits us. Certainly the one-way past created absurdities we could do without.

What is more existentially exasperating than a No Entry sign? This graphic of universal urban frustration was standardised by the League of Nations in 1931 (the year that the same ineffectual busybodies merely tut-tutted about the Japanese invasion of Manchuria).

Roads are not natural; they are inventions. And sealed roads to carry heavy traffic are inventions as typical of the 19th century as the typewriter and the diesel engine. MacAdam created the information superhighway of Victoriana. One-way streets were the final, and now obsolete, refinement of the road as a communications medium. They remain as dread memorials to vanished concerns, alien values and hopeless, irrelevant targets.

The concept began with good intentions. Albemarle Street in Mayfair became uni-directional in 1808 when crowds attending Samuel Taylor Coleridge's lectures at the Royal Institution made traffic-planning necessary. But the modern theology of traffic management dates back only to 1963 when Colin Buchanan, a town planner, published his ruinously influential report Traffic in Towns.

Wheeled traffic has been successfully mingling in towns and cities since the Etruscans, but Professor Buchanan took great exception to the idea and intended, with great athletic earnestness, to separate people and cars, the better for us to prosper by accelerator. The official attitude to cars in 1963 was curiously similar to Victorian ideas about prostitution: a mixture of acceptance and disgust.

With a fixity of purpose perhaps inviting Freudian interpretations, Buchanan wanted flyovers, clearways and pedestrianisation. Out went the clutter of accumulated townscape. Towns were to be cleansed of intimacy, hazard and surprise. In came Mr and Mrs Citizen swooping at high speed along urban motorways in a bizarre dystopia where your Cortina "saloon" would drive you to a Ballardian destiny in a tower block (where unspeakable crimes might be perpetrated).

In towns, the false god of the one-way street was an agent of change that proved catastrophic. This, of course, was the very moment that other visionaries thought it wise to, quite literally, decimate the railway system in the interests of "economy". The M25 between Junctions 8 and 9 northbound on a Monday morning is their memorial. And the hell of Wandsworth, Vauxhall

Cross or Hammersmith is Buchanan's.

One-way systems are wrong because they are counterintuitive and seek to impose a spurious logic on human behaviour, something always at its most interesting when irrational. There is surely something very nasty in the concept and expression "gyratory". It suggests circles of Hell and invites the conjoined idea of futility and an endless quest for an impossible goal.

To enter any gyratory system — often survivable in a car, more precarious on a bike, but suicidal on foot — is to go on bargaining terms with urban aggression and the one-dimensional solutions of the traffic engineer. In pursuit of something that looks good on a graphic, but does not work on the ground, sinister gyratory systems generate millions of unnecessary miles and thousands of tons of pollution.

And people hate them. Best to reinstate the Darwinian struggle of the two-way street and re-create cities that respond to the cheerful anarchy of individual purpose, not a chilly master plan. This is a prospect pleasantly hinted at in a new exhibition. The architectural publisher and bike evangelist Peter Murray has created a series of enamel plaques mocking London's one-way system. Of Fitzrovia he says it "fails in its aspirations to speed the traffic, but succeeds in confusing cyclists and traffic alike".

One-way was designed to "reduce congestion". In true conformity with the Orwellian model, it did the opposite. One-way ? "Wrong way, go back" as the signs say on US freeways. I'm glad to say we are.