

# Response to the London Borough of Hackney's Draft Parking Enforcement Plan (PEP)

## London Cycling Campaign in Hackney



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# Table of Contents

I. INTRODUCTION	4
II. PRELIMINARY REMARKS	4
III. GENERAL REMARKS	5
(1) What kind of parking?	5
Recommendation	5
(2) Definitions	5
(3) Hierarchy of preferred cycle parking solutions	6
(4) Non-car modes	6
(5) Demand for cycle parking	7
Assessing demand	7
Information provided by the PEP	7
(6) Local deliveries by pedal cycle	7
Recommendations	7
IV. SUMMARY OF OBJECTIONS	8
(1) Motorcycle Parking (Sections 10.7 and draft policy NCM3)	8
(2) PS2	8
(3) PP3	8
V. DETAILED COMMENTS	9
(1) Foreword	9
(2) Section 1.2	9
(3) Section 1.3	9
(4) Section 2.8	9
(5) Section 2.10 S2	9
(6) Section 2.12 P1	9
(7) Section 4.29	9
(8) Section 4.30	9
(9) Table 4.1	9
(10) Section 5.0	10
(i) Controlled zones vs. restricted zones	10
(ii) Type of CPZ	10
(iii) Benefits of RPPSs	10
(11) Section 6.30	11
(12) Section 9	11
(i) Comments on Parking and Enforcement Plan advice contained in the Mayor's Local Implementation Plan (LIP) Guidance (Appendix E)	11
Aims of parking controls (Section 2 of Appendix E in the LIP guidance):	11
Parking control measures and activities (Section 3 of Appendix in the LIP guidance):	11
Section 5 of Appendix in the LIP guidance:	11
Parking and Enforcement Plans (Section 7 of Appendix in the LIP guidance):	12
Section 8 of Appendix in the LIP guidance:	12
(ii) Decriminalisation of parking enforcement	13
(iii) Enforcement of cycle facilities	13
(iv) Status of cycle facilities	13

(13) Section 9.2	13
(14) Section 9.10	13
(15) Section 10	13
Recommendation	13
(16) Section 10.7	14
(17) Section 11.7	14
(18) Section 13.5	14
(19) Section 13.10	14
(i) Preferential options to car clubs	14
(ii) Parking for car clubs?	15
(20) Section 13.11	15
(21) Section 13.12	15
(22) Section 13.14	15
 VI. COMMENTS ON DRAFT POLICIES	 15
(1) PS1	15
(2) PS2	15
(3) CPZ2	16
(4) PP3	16
(5) PP5	16
(6) Recommendation to include a policy E5	16
(7) NCM1+2	16
(8) NCM3	16
(9) ND1	16

## ***I. INTRODUCTION***

**The London Cycling Campaign is the largest urban cycling organisation in the world, with over 9,000 members, and the London Cycling Campaign in Hackney (LCCiH) is its largest local borough group with more than 800 members.**

Thousands more cycle in Hackney every day. Levels of cycling in Hackney are the highest in London (6.83% of working residents commute to work by pedal cycle), and the 70% growth in cycling in Hackney from 1991 to 2001 is the highest in the UK.

Following efficient campaigning by the London Cycling Campaign, the introduction of the Congestion Charge and other measures, cycling has increased even further. It is estimated that cycling increased by 60% between 2000 and 2004.

## ***II. PRELIMINARY REMARKS***

We welcome the opportunity to respond to this important consultation and commend LB Hackney for taking the initiative of preparing a Parking Enforcement Plan (PEP) so quickly after the introduction of the Mayor of London's Local Implementation Plan Guidance.

The draft Plan properly addresses the importance of cycle usage in the context of overall road vehicle usage and parking policy in Hackney. Cllr. Crowe's foreword on page six of the draft notes the legal obligation under the Road Traffic Reduction Act 1997 to reduce motor traffic and its impact on health and safety and to promote alternative to private car travel where possible. The combined impact of a growing population, comparatively low car ownership rates and congestion charging provide an ideal environment for the promotion of cycle use for short trips within LBH and in journeys to other inner London boroughs.

The draft contains many good initiatives aimed at making Hackney's transportation profile more sustainable. However, we are concerned that certain draft suggestions do not go far enough and that there are a number of notable omissions, such as enforcement of cycle facilities (e.g. vehicles blocking cycling lanes). Additionally, we object to a number of draft policies, on the grounds outlined below.

We note that the PEP also needs to take into account the supplementary policies and targets of the **London Cycling Action Plan (LCAP)**, which is part of the Mayor's Transport Strategy.

We would also like to review the Appendices, which are not included in the consultation draft, for further informed comment.

### **III. GENERAL REMARKS**

#### **(1) What kind of parking?**

Following initial discussion of plan priorities and objectives and a hierarchy of parking needs (Table 2.1), the draft Plan appears to use 'parking' to refer to car parking only. There should, however, *in each instance* be a clear distinction of which type of parking is being addressed, and if all types of parking are being addressed, inclusive language should be used.

This is an important point and not just a semantic one, with a strong impact on the overall quality of the Plan. In line with the overall prioritisation of motor traffic noted as a problem in section 4.10 and elsewhere, the wording of a report can often cloud judgment and influence its conclusions. If, however, it is consistently acknowledged that car parking is just one of a variety of kinds of parking, the report has a much better chance of aiming for the right policies.

#### **Recommendation**

The PEP should contribute actively towards making Hackney London's first Cycling Borough.

#### **(2) Definitions**

Full legal definitions of the different types of vehicle likely to require parking spaces in Hackney should be included. This is especially important if Hackney's transport profile is to change over the coming years and to allow new, innovative transport solutions to take their place. Therefore, 'cycle' or 'bicycle' should be changed to 'pedal cycle' throughout. This is because not all human-powered vehicles are two-wheeled. This is recognised in law. The relevant definition is:

"pedal cycle" means a unicycle, bicycle, tricycle, or cycle having four or more wheels, not being in any case mechanically propelled unless it is an electrically assisted pedal cycle of such class as is to be treated as not being a motor vehicle for the purposes of the 1984 Act. (Statutory Instrument 1994 No. 1519: The Traffic Signs Regulations and General Directions 1994. In Part 1, Section 1 (Preliminary), Item 4 (Interpretation general))

It might be added to this definition that there is a wide variety of types of pedal cycle: e.g., the familiar two-wheeled safety bicycle in all its variations, with chain, shaft, or belt transmission systems, partly electrically assisted or not, but also recumbent cycles, unicycles or three- and four-wheeled vehicles, many of which are 'workbikes' used for the delivery of goods and services and are set to play an increasing role in London's future sustainable transport profile.

It is therefore very important that the PEP recognise the increasing emergence of non-two-wheeled pedal cycles as human-powered modes of transport, as many cycles require parking provision quite different from 'traditional' bicycle parking. A note must be made of the widely varying dimensions of pedal cycles, which can be up to 1.5m wide, and their resulting different parking needs.

It must be noted that especially (adaptive) cycles used by disabled people will often be wider types, and cycle parking must therefore be provided that permits secure storage of such cycles.

#### **(3) Hierarchy of preferred cycle parking solutions**

We note that section 10.5 assigns priority to on-footway cycle parking, with on-

carriageway parking noted as a secondary option. This is, in our view, not the best order of priorities. As noted in the report, many of Hackney's footways are already very congested and preference should be given to cycle parking that does not contribute to this.

We therefore suggest that on-carriageway cycle parking should be the preferred solution, and that P11 (2.14, p.19) should include an explicit recommendation and preference in favour of on-carriageway cycle parking wherever possible, in order to further discourage car parking and to prevent footway clutter.

Our suggested hierarchy of levels of service for cycle provision is therefore as follows:

- Cycle parking located in the carriageway where practicable. A sample drawing is located at: [http://www.hackney-cyclists.org.uk/parking/on\\_street\\_x.jpg](http://www.hackney-cyclists.org.uk/parking/on_street_x.jpg).
- Cycle parking replacing guard railing on the footway.
- Cycle parking on the footway, located out of the way of pedestrians.

We suggest that the PEP adopt this hierarchy.

The PEP should also actively explore possibilities to replace guard railings with cycle parking wherever possible. Guard railing on footways is an anti-pedestrian measure that encourages higher vehicle speeds, de-prioritises pedestrian movements, and damages the vitality of shopping areas by this de-prioritisation. Replacing it with cycle parking stands still maintains a form of pedestrian deflection, discouraging pedestrians from crossing the carriageway at points where this might be deemed unsafe under traditional road safety thinking, but at the same time introduces the possibility of informal crossing, reduces vehicle speeds, and provides a useful service. As noted, footway cycle parking would be our second preference under most circumstances, but our hierarchy of preferred solutions is flexible enough to allow for all three possibilities as outlined above.

#### ***(4) Non-car modes***

Cycling should not be addressed together with the other non-car modes. Instead, a clear distinction needs to be drawn between motorised transport and pedal cycling when it comes to parking.

Moreover, the section on cycle parking should be located before the sections on motor vehicle parking, in order to maintain consistency with the road user priorities in Table 2.1 and to show the priority that cycle parking must receive under the sustainability criteria of the ODPM's Sustainable Communities Programme, the Mayor of London's Transport Strategy (MTS) and London Plan, and the Sustainability Theme of Hackney's own Community Strategy. Above all, the PEP should seek to make a contribution to sustainability by discouraging motor vehicle journeys in Hackney as much as possible.

#### ***(5) Demand for cycle parking***

##### **Assessing demand**

Demand for cycle parking can be inferred from street observations. Cycles locked to street furniture provide a reliable measure of unsatisfied demand. It is also worth considering surveys as some people would not use cycling at all as a mode unless they had secure parking at a destination.

LB Hackney should consider amending existing regulations to remove discarded cycles from cycle stands.

Supply of parking places for disabled people should include disabled cyclists

using three and four wheel cycles (see also under heading (2)).

### **Information provided by the PEP**

Details need to be added for pedal cycle parking facilities, especially in town centre and housing estate locations. These should comprise public secure and insecure off- and on-street cycle parking, as well as cycle parking at larger businesses and housing developments.

This has been forgotten in the PEP guidance to Local Authorities in Appendix E of the Mayor's Local Implementation Strategy Guidance (2004), but should be included in Hackney's PEP owing to the importance of cycle traffic here. Please see our comments on section 9 below for information on a current study of cycle parking. The officer contact in Hackney is Olu Soyoye, the walking and cycling officer.

### **(6) Local deliveries by pedal cycle**

It is very important that the PEP contain explicit recommendations for local deliveries to be carried out by pedal cycle. It is a well-known problem, for instance, that pizza delivery businesses park their delivery mopeds or scooters illegally, e.g., on the footway. Robust encouragement to use suitable pedal cycles for this type of delivery would help Hackney's transport profile immensely. P4 (2.12, p. 18) should reflect this aspiration.

### **Recommendations**

- Car parking revenue could be used to set up an incentives scheme for local businesses to use pedal cycles. The emphasis here is on 'local', and deliveries from, e.g., pizza delivery services are rarely over long distances.
- We also note from section 6.38 that 48 Doctor's Permits were issued in 2002/03. Such revenue could be used to explore possibilities together with health providers to set up incentive schemes for healthcare workers to use pedal cycles for making house calls and other local journeys. The Hackney Primary Care Trust is very supportive of cycling, for instance in its support for the excellent Bicycle Users' Group at St Leonard's Hospital. Given that such a large number of people working in Hackney are employed in the health sector, a programme of reducing private car use should be targeted at them in collaboration with healthcare providers.

### **(7) Supporting sustainable transport by de-engineering**

The PEP must contribute to ensuring that the signing of the regulations is proportionate to the streetscene. In many cases, a heavily engineered, signed, and marked street environment detracts from the character of the street as a place with functions other than the passage of traffic and storage of vehicles. Also, heavy marking increases vehicle speeds. Yellow lines are like go-faster stripes. They are unnecessary in many locations such as, for instance, the Narrowway through Hackney town centre which is limited to access for loading only. Consequently, anyone going there to park can be ticketed automatically as the entry signs say 'No waiting'.

Yellow lines etc. mark a street out as a motor road—we suggest moving toward a 'continental' system with signage at junctions (e.g. no stopping) advising of the restrictions ahead. There are already possibilities how this sort of measure can be implemented in this country. These initiatives should also be seen in conjunction with Hackney's forthcoming Streetscene and Public Realm guidance and its initiatives in reducing street clutter and disruption of the visual impression of streets in general.

## **IV. SUMMARY OF OBJECTIONS**

### ***(1) Motorcycle Parking (Sections 10.7 and draft policy NCM3)***

We object to this policy.

### ***(2) PS2***

We object to this draft policy for the reasons given in the detailed comments.

### ***(3) PP3***

We object to this draft policy for the reasons given in the detailed comments.

## **V. DETAILED COMMENTS**

In this section, we comment on points of concern throughout the draft and often suggest alterations to the text. We also explain further the context of and reasoning behind our objections, in the order of the relevant sections.

### **(1) Foreword**

Third paragraph from the end: replace 'reduce traffic' by 'reduce motor traffic' and 'traffic volumes' by 'motor traffic volumes'.

### **(2) Section 1.2**

A new bullet point should be added to the purposes of enforcement:

- assist safety & convenience of people cycling

### **(3) Section 1.3**

(Insert new bullet point vi) increasing the supply and standard (security and degree of weather protection) of parking for pedal cycles

### **(4) Section 2.8**

We suggest substituting 'non-motorised transportation' for 'pedestrian' in the discussion of priorities.

### **(5) Section 2.10 S2**

Add: ... 'such as cycling and walking.'

### **(6) Section 2.12 P1**

It needs to be made clear that this policy should refer back to the hierarchies of road users and vehicle types in Table 2.1 in its 'assessment of needs and priorities'. This is important in order to understand how the PEP is to achieve its strategic objectives, which cannot be understood without Table 2.1, through these policies. If such an addition is not made, it is not sufficiently clear that the PEP's priorities differ from the current dominance of modes of transport that have neither road user nor vehicle type priority in Table 2.1.

### **(7) Section 4.29**

This and all other relevant paragraphs should include an explicit recommendation for Hackney to adopt a car-free housing policy and to adopt planning guidance severely limiting all forms of off-street car parking. While it may be thought that off-street car parking provision eases car parking pressure, the reverse is actually the case, as increased car parking attracts more vehicles. Needless to say, a car parking space is an attractor or trip generator, and any additional car parking provision except for disabled parking generates superfluous car movements.

### **(8) Section 4.30**

This should state explicitly that the overall aim is to reduce the number of car parking spaces in line with the user and type of parking hierarchies in Table 2.1, as outlined above.

### **(9) Table 4.1**

The Plan should note that the Gillett Street car park will shortly close in favour of the Gillett Culture Square development, one of the Mayor of London's first ten spaces in

his '100 spaces for London' programme. See

[http://business.ground-level.org/stories/storyReader\\$9](http://business.ground-level.org/stories/storyReader$9)

This is good news, as the square will attract many more people to the area than the car park ever could have. The Council should also adopt a policy of not building any new car parks.

#### **(10) Section 5.0**

We note that the map accompanying this section is out of date in view of recent CPZ changes.

##### **(i) Controlled zones vs. restricted zones**

We recommend that LB Hackney implement *Restricted Zones*, rather than the current Controlled Zones, wherever possible. An example is the Restricted Zone in Leytonstone town centre implemented by Waltham Forest Council. For this type of zone, yellow lines would not be needed as parking is only permitted in marked bays, and car parking is prohibited throughout except where specifically marked, rather than permitted unless prohibited. However, in contrast to some Restricted zone, off-street car parking should be avoided.

##### **(ii) Type of CPZ**

As per current Council policy, however, we expect the vast majority of zones in the near future to be Controlled Zones. It was also our understanding that the Council does not support CPZs as such, but only a specific type of CPZ, namely Residents' Priority Parking Schemes (RPPSs) and the Plan should certainly reflect this. Standard' CPZs often see a maximisation of car parking, as for instance in Kensington and Chelsea, whether on- or off-street, in order to increase revenue. In line with Cllr Crowe's comments on revenue utilisation in the foreword, the Council should not possibly increase car parking provision in areas where revenue might be raised from non-residents, even if the revenue raised were to contribute to sustainability objectives. It is therefore very important that the PEP set in a policy context what type of CPZs is envisioned for the borough and this should include specific commitments to:

- only implement RPPSs;
- only implement RPPSs with a view to controlling the overall number of car parking spaces available, never to increase the existing level, and ideally to reduce it through necessary measures such as junction safety lining, the creation of passing points to help buses and prevent road rage incidents, and the facilitation of bus movements in general;
- and only implement RPPSs if a certain number of car parking spaces can be re-allocated to on-carriageway cycle parking spaces, especially in busy shopping areas and other places where cyclists may wish to go.

In summary, we support the Council's commitment to car parking enforcement and would note that RPPSs should not only be introduced in response to 'parking pressures'. They have many other well-known benefits, such as tremendous street scene improvements, etc.

##### **(iii) Benefits of RPPSs**

The report should certainly make a comprehensive note of the negative effect of car

parking on personal safety and security (especially children, and especially at junctions), street cleanliness, the difficulties caused by car parking for carrying out public works, the difficulty for the emergency services in reaching houses, the problems with traffic flow in heavily parked-up areas (especially for buses) and the resultant widespread introduction of unsafe and high-speed one-way streets, etc. It should include a clear recommendation that RPPSs can help alleviate these problems considerably, drawing on the wealth of national and international research available.

**(11) Section 6.30**

Acknowledgement is needed here that car parking needs of local businesses can be decreased or removed by increasing use of pedal cycles by customers. There is no evidence that motor traffic significantly benefits business as passing trade. On the contrary, cyclists have been shown to use local businesses and services much more than motorists, who often shop further away. Cyclists make more trips but tend to spend more locally, and the report therefore needs an explicit recommendation that most businesses benefit from increased cycle traffic.

**(12) Section 9**

**(i) Comments on Parking and Enforcement Plan advice contained in the Mayor’s Local Implementation Plan (LIP) Guidance (Appendix E)**

While the Mayor is much to be commended to introduce this guidance, there are a number of significant omissions relating to cycling. We set out our proposed additions to the section on enforcement as below. Note that we have not included specific comments as to how these might be included in Hackney’s PEP, as they would need to be inserted in a variety of sections, especially section 9, but also others. All points below are consistent with the Mayor’s Transport Strategy, and it is the decision of the local authority as to whether to include them in the PEP.

<p><b>Aims of parking controls (Section 2 of Appendix E in the LIP guidance):</b></p> <p>A new bullet point should be added:</p> <ul style="list-style-type: none"> <li>• assist safety &amp; convenience of people cycling</li> </ul>
<p><b>Parking control measures and activities (Section 3 of Appendix in the LIP guidance):</b></p> <p>The tenth bullet point would be better formulated as follows:</p> <ul style="list-style-type: none"> <li>• increasing the supply and standard (security and degree of weather protection) of parking for pedal cycles</li> </ul>
<p><b>Section 5 of Appendix in the LIP guidance:</b></p> <p>In the second bullet point, cycling should be added specifically rather than it just being part of ‘other [motor] traffic management measures’. Management does not imply growth but rather stopping or reducing growth and its negative effects, and it is therefore not clear enough to say that all modes of traffic should be managed in the same way.</p>

**Parking and Enforcement Plans (Section 7 of Appendix in the LIP guidance):**

Under 'Supply of parking' it should be added that the PEP should also contain:

- Details of the number of public secure and insecure off- and on-street cycle parking spaces

(Hackney's PEP can be assisted in providing this information by a current study being carried out by TPI consultants (Adam Bows); contact [olu.soyoye@hackney.gov.uk](mailto:olu.soyoye@hackney.gov.uk) for more information. Additionally, a few years ago Transport Management Solutions carried out a study on on-street cycle parking demand in Hackney. Contact [tamsol@aol.com](mailto:tamsol@aol.com) or [trevor@hackney-cyclists.org.uk](mailto:trevor@hackney-cyclists.org.uk) for more information.)

- Details of cycle parking at larger businesses and housing developments.

(As we recognise that it could be a big task to have details of all parking, it would be highly recommended that in order to include useful information in the PEP, it would be best to focus on the largest demand locations.)

Under 'Demand for parking' it should be added that

- Cycles locked to street furniture are a reliable measure of unsatisfied demand. Surveys should be carried out to determine the extent of this demand and take into account that some people would not consider using cycling at all as a mode of transport unless they had secure parking at their destination.

Under 'Compliance with existing regulations': add a new bullet point:

- Strategy to remove discarded cycles from cycle stands

(Abandoned or vandalised cycles are often unsightly and those which their owners intend to repair are rarely left about for long.)

**Section 8 of Appendix in the LIP guidance:**

In the note that parking places for disabled people should be supplied it should be added that it must include disabled cyclists using three and four wheel cycles.

**(ii) Decriminalisation of parking enforcement**

The London Local Authority and TfL Act decriminalised parking enforcement, with TfL and London boroughs sharing responsibility. This is a significant opportunity. Police enforcement of illegal parking was largely non-existent or ineffective owing to the staff time required for its enforcement as a criminal offence, and the lack of proper traffic police in London. The local authority can now undertake this task with a very different and much more efficient approach.

**(iii) Enforcement of cycle facilities**

It should be noted that cycle facilities, where they are enforceable, are among the most frequently abused parts of the road:

- Parking in mandatory cycle lanes is illegal during the hours of their operation.
- Of especial importance is enforcement of the frequent parking across cycle gaps

at mode filters (road closures that permit access by pedal cycle).

- Enforcement resources should also be directed at the abuse of these and other cycle facilities by motorcyclists.
- Illegal parking often blocks dropped kerb or raised table crossings either for pedestrians or cyclists, and offending vehicles should be ticketed and in some cases removed from such crossings.

Enforcement of such facilities should therefore be prioritised along with enforcement of bus lanes. This would address MTS 4G.Po2, which calls for balanced use of street space, and is especially important in view of the high priority pedal cycles receive in Hackney's road user hierarchy, also adopted in the PEP. Additionally, where illegal car parking restricts access at junctions, cyclists are often put at risk.

#### **(iv) Status of cycle facilities**

The PEP should recommend changing advisory cycle lanes to mandatory wherever possible. This is to ensure that cycle facilities receive better legal protection. Advisory cycle lanes are often misunderstood, and parking in them is not illegal. This causes problems for cyclists who often find themselves stuck behind parked cars and forced to cycle around them when there is often not enough room left between the outside of the parked car and moving vehicles.

#### **(13) Section 9.2**

The definition of vulnerable road users should be amended as follows: ' ... such as school children, other pedestrians and cyclists'.

#### **(14) Section 9.10**

We suggest amending 9.10 to address parking in cycle lanes: '... Illegal parking on zigzags, double yellow lines, cycle lanes and footways can cause a serious road safety hazard.'

#### **(15) Section 10**

We welcome the reference to LCC web-site, as the LCC is the source of best practice advice on all aspects of cycle parking and should be consulted frequently in case of questions. Note that the source of the census data is actually a report by John Parkin of the Bolton Institute of Technology, which can be downloaded here:

<http://www.hfcyclists.org.uk/Parkin.pdf>

Full reference:

Parkin, J. (2003) Comparisons of cycle use for the journey to work from the '81, '91 and 2001 censuses. *Traffic engineering and control*. September Vol 44 No 8, pp299-302.

Much more robust acknowledgement of the role of cycling in Hackney is needed in the section relating to cycling.

#### **Recommendation**

The PEP should contribute actively towards making Hackney London's first Cycling Borough.

**It should be noted that the LCC has prepared guidance on cycle parking and storage, which is in the process of being adopted as part of the DfT's**

## **forthcoming Cycle-Friendly Infrastructure 2.**

### **(16) Section 10.7**

We **object** to this section and the associated policy NCM3. The Council should NOT introduce more parking facilities for powered two-wheelers, whose use should be discouraged by limiting and reducing the supply of parking. Motorcycling is the road traffic mode with the worst KSI rate and is highly polluting, and should therefore be discouraged as a mode of transport by the Council.

### **(17) Section 11.7**

We note that the Council's targets for motor traffic reduction should be considerably more ambitious than set out in the Road Traffic Reduction Act owing to the cycle-friendly nature of the borough. See comments on section 10.

### **(18) Section 13.5**

We very much welcome the initiative to reduce the number of car journeys to the Congestion Charging Zone boundary.

### **(19) Section 13.10**

#### **(i) Preferential options to car clubs**

With the exception of the brief reference to Travel Plans, this section appears to talk almost exclusively about car-based initiatives such as Car Clubs. While we cautiously welcome car clubs over exclusive private car ownership, we take the view that this section is in need of comprehensive revision in order to make explicit mention of use of the pedal cycle and to reduce the emphasis on car clubs. It should be made clear that Car Clubs are below cycling in the Council's preferred order of solutions. This section also needs to note the wide range of initiatives undertaken by Transport for London, Hackney Council, the London Cycling Campaign, Sustrans, and other bodies, in order to promote use of the pedal cycle. Examples of such initiatives include:

- The London Cycle Network Plus, which is the current investment programme for the London Cycle Network, a comprehensive network of cycle routes (. The PEP should include a clear policy to ensure enforcement of car parking on these routes and of mandatory cycle facilities in general.
- The National Cycle Network, which is being built by Sustrans and partners.
- The HomeBikePark project, which is a partnership between the London Cycling Campaign in Hackney and Hackney Council delivered through the Transport Sub-Partnership (TSP). See [www.hackney-cyclists.org.uk/parking/](http://www.hackney-cyclists.org.uk/parking/).
- On-street cycle parking initiatives, some delivered with significant input from the LCC in Hackney.
- The possibility of renewed projects such as CycleActive, a project in the year 2000 in which Hackney GPs prescribed cycle training and cycling as exercise (see <http://www.trevor.uklinux.net/cycleactive/www/who.htm>).
- School cycle training, set to be included in the Government's next White Paper, and pioneered in Hackney by STA Bikes at Sir Thomas Abney Primary School and now thirteen other primary schools constituted as the SuperNova organisation.

There are many more such initiatives, too many to list here, and this section must include comprehensive reference of such initiatives, as they all contribute

significantly to Hackney's UK-leading rate of increase in cycling, and therefore contribute more and more to reducing the need for car parking, at the same time of course increasing the need for cycle parking.

### **(ii) Parking for car clubs?**

We hope that this section, when it mentions the need 'that accessible parking, including on-street parking, is made available to service users' refers to a re-allocation of existing parking, ideally coupled with an overall reduction of car parking spaces. It would make no sense to introduce *additional* parking for car clubs, as they are meant to reduce the number of overall parking spaces needed.

The wording should therefore be clarified here to include an explicit recommendation against increasing the overall number of car parking spaces, and note that the introduction of car clubs will make fewer spaces necessary.

### **(20) Section 13.11**

This section should not only note that Car Clubs are good for large developments 'with a minimum of 100 residential units', but also that smaller-scale car clubs can function very well, as shown in numerous initiatives around the country.

The section also reads as if it only envisages new development to adopt car clubs, but they can, of course, be introduced anywhere and need not be limited to unified developments. Even just four families sharing one car are better than each running one.

Finally, the section should note not just that 'Car Club developments should be supported by reduced parking standards.' It must be made clear that this cannot refer to outdated planning guidance on minimum car parking requirements, as this is now no longer permissible in London. Instead, only maximum standards are allowed, and this includes the possibility of car-free housing. Therefore, this recommendation should read: 'Car Club developments should be supported by parking standards for car-free housing.'

### **(21) Section 13.12**

It is vital that it be clarified in this document how it relates to the emerging policies with respect to parking in the LDF. Our view is that the PEP should make an explicit recommendation that car parking provision should be limited as much as possible both on- and off-street and cycle parking maximised both on- and off-street. This section should also make clear which parts of the LDF are likely to be relevant. So far, only the Phase 1 documents have been begun, with some being consulted on.

### **(22) Section 13.14**

Car Clubs and car share are not sustainable as such—they are just slightly more sustainable than present car travel patterns. Again, more explicit reference must be made to their comparatively low place in the hierarchy behind measures to increase cycling.

## **VI. COMMENTS ON DRAFT POLICIES**

### **(1) PS1**

Here we recommend that the Council should eliminate footway car parking altogether.

### **(2) PS2**

As stressed above, the Council should *minimise* all off-street car parking facilities,

especially in its main town centres. Maximising off-street parking facilities there will encourage more car trips and add disproportionately to traffic congestion in the already congested centres. This would be completely counter-productive to town centre regeneration initiatives already underway.

All the available research demonstrates that car parking provision does not support local business much, as the users of sustainable modes use local shops and facilities far more than motorists, who travel further away.

If what is meant here is that use of the existing car parking facilities be maximised, this would still result in more car trips and obscure the need to reduce off-street car parking facilities considerably.

**We therefore object to this draft policy.**

**(3) CPZ2**

This policy should include a note that RPPSs (see above) contribute to strategic objectives other than easing parking pressure. In particular, the remit of the technical assessment needs to be explicitly extended to aspects such as street scene, crime, road danger reduction, and other beneficial effects of RPPSs.

**(4) PP3**

We object to PP3. Electric vehicles offer few benefits over petrol fuel-driven motor vehicles, and their use should not be encouraged. They are not sustainable; what makes them appear green is that the pollution they cause simply occurs where the energy that drives them is generated. Smaller motor vehicles, as electric vehicle today typically are, have also been shown to cause more congestion than larger vehicles, as they tend to hit the roads in greater numbers and queues made up of smaller units get moving more slowly than those made up of larger units. There is no evidence that electric vehicle contrivute markedly to an improvement in road safety.

**(5) PP5**

This should include a recommendation to shift business use to pedal cycles, and set out a business case for them (cheaper to run, gets around more quickly) etc.

**(6) Recommendation to include a policy E5**

‘Special enforcement should be directed at car parking obstructing the borough’s enforceable cycle facilities, such as mandatory cycle lanes’.

See also more detailed comments on section 9 above.

**(7) NCM1+2**

Note that ‘on-street cycle parking’ refers to both footway and carriageway parking, as the street consists of the footway and the carriageway. A distinction should therefore be made between the two types, with an emphasis on favouring on-carriageway cycle parking.

**(8) NCM3**

We **object** to this policy. As mentioned above, use of powered two-wheelers should be discouraged by the Council wherever possible.

**(9) ND1**

Note that the London Plan permits car-free housing.