

MM

ExD	HDC	HSS	NPD	HoE	Policy	Design	Times
DC		Received RBKC Planning			Reg	PIO	
Enf		09 DEC 2009			LLC	Appeals	
Str Dev		N&N	Obj	Supp	No Obj	Rev	Other

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-applies to ① CV18
② CA7

Dear Sir

Representation on the Proposed Submission Core Strategy the Royal Borough of Kensington and Chelsea with a Focus on North Kensington

This 'representation' is made on the grounds that the policies set out in the Borough's Core Strategy formulated to increase the use of cycling as a means of transport are not 'justified'. There is 'robust and credible evidence' that journeys by bicycle will only increase if they are safe*. The details of the policies chosen indicate that the 'most appropriate strategy' has not been adopted and that there are 'reasonable alternatives'. [PPS 12] 1/170

The Core Strategy policies to reduce car use by residents, and increase journeys by foot and bicycle, are based on a desire to reduce congestion and street parking and improve air quality. The policies and initiatives contained in the Core Strategy do not address the fundamental issue of the need for safe cycle routes in order to bring about the desired increase in bicycle journeys. The plans incorporated in the Core Strategy do not address cycle routes: most existing cycle paths are not shown on the maps, future cycle paths are not linked into a coherent pattern, and through-paths on new developments are not mentioned.

There has been no 'joined up' thinking about continuous cycle routes!

A north south cycle path

1.1 The chain of development down the western edge of the Borough from the towpath on the grand union canal in Kensal, to Lots Road and the Thames Path in the south, provide a magnificent planning opportunity for a north/south safe cycle route.

1.2 The three major development areas of Kensal, Warwick Road and Earls Court, with the redesign of the Latimer streets and the proposed pedestrian/cycle route south from Brompton Cemetery to the Thames, make such an idea more than feasible. Between the development sites there is railway land, the quiet roads of the St Quentin estate, and Hansard Mews and an existing contra-flow cycle route up Elsham Road in Holland Ward.

1.3 The pupils of the two new Academies located on or near this route in Latimer and the Lots Road area would benefit from a north/south safe route.



1.4.1 The London Mayor's proposed 'hub' of cycle routes from outer London Boroughs to the centre of London, are likely to be west-east routes, and will not greatly assist cyclists travelling north or south *within* the Borough. East-west routes would however help through-cyclists. They would also contribute to the reduction of particulates, and improve air quality by encouraging non-resident through-travellers out of their cars and on to bikes.

1.4.2 The only west-east continuous cycle path proposed is Westway (Chapter 8). There are no proposals for west-east routes between Westway and the Thames. Improved pedestrian links are addressed in most places and strategic sites, but not cycle links. An example is Notting Hill Gate (Chapter 16), a key location on an important east-west route. The Core Strategy proposes narrowed vehicle lanes and widened pavements for pedestrians, but no cycle path. A few hundred yards to the east of Notting Hill Gate are the dedicated cycle paths of Hyde Park which lead to central London, but there is no recognition of the need to connect to this major cycle route, or make cycling through Notting Hill Gate safer.

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Linked cycle routes

2.1 Where specific cycle routes are shown on maps, they are not linked to other cycle routes. For example the South Kensington map (Ch 12) shows Imperial College Road is to be improved as a pedestrian and cycle route, but there is no vision to link it via the wide thoroughfare of Queens Gate to the cycling routes within Hyde Park. A safe north-south cycle route on the east of the Borough would greatly assist students at the many educational establishments in this area.

2.2 Maps of 'places' and 'strategic sites' do not show the existing dedicated cycle paths, indicating that practical steps to make cycling an attractive option have been overlooked. For example the map of Kensington High Street which now has a central reservation bike park, does not show the north-south Holland Walk cycle path that connects the High Street to Ladbroke Grove.

2.3.1 Maps of some areas are not consistent with the text of the Core Strategy in relation to cycling. This makes the overall picture confusing, and suggests that cycle routes were initially seen as a minor planning issue. An example is the pedestrian and cycling improvements in the south of the Borough covered in Chapters 17 and 18.

2.3.2 The Fulham Road (West) map in Chapter 17 shows an improved *pedestrian* route through and south of Brompton Cemetery annotated as a 'pedestrian & cycle link from cemetery to Thames'. This is not consistent with the adjacent area map of Lots Road and World's End in Chapter 18 which shows only pedestrian routes to and along the Thames, and no cycle routes. However, 'the number of new pedestrian and cycle links established in and to Brompton Cemetery' is an output indicator for the purposes of monitoring

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Chapter 17. Further, the Vision statement, CV 17, says that "Pedestrian and Cycle routes to the north and south will be improved." The related map shows a 'North-South cycle link' across Fulham Road although what it links to is unclear.

2.3.3 The amended policy at CV 18 now includes a specific reference to cycling and pedestrian routes over the Thames at Cremorne Bridge. But, the proposed bridge over the Chelsea Creek is pedestrian only. At 18.3.11 it says there will be pedestrian and cycling links along and across the Thames, but then a very general commitment to 'support enhanced pedestrian, cyclist and bus links in the area'. So there are fragments of good intent but no coherent picture of a pattern of cycle routes.

①
CV18

A reasonable alternative

3.1 Improved public transport has been the dominant policy option to get people out of their cars. Policies to reduce street parking and deny parking permits to residents of new developments have crowded out new strategies to encourage cycling. The cycling issue has been dealt with by emphasis on bike stands and showers in offices [CT1].

3.2 A better alternative would be practical wider planning solutions such as dedicated cycle paths and safe routes to encourage bike use by residents and through-travellers. In some chapters the cycling option has been completely overlooked. An example is the major housing development at Earls Court (Chapter 10). There is mention of pedestrian movement at 10.3.3, but none of cycling. The Policy statement CA7n refers to improved pedestrian links – no mention of cycling links.

②
CA7

If this objection goes to the Planning Inspector, I do want to make it clear that I have been very impressed with the way this Strategy has evolved as a result of input from residents: many of my previous submission have been taken on board. I apologise for the fact that I did not spot the north-south cycle route opportunity before. Had I done so, I would have raised it at an earlier stage.

Yours sincerely

B M M Vincent-Emery (Ms)

* Injuries to cyclists in Britain are disproportionately high compared with those to drivers and passengers in cars. From 1999 to 2004, 35,000 cyclists were injured severely enough to be admitted to hospital in England, compared with 71,000 occupants in cars. A third of the injuries to adult cyclists, and a fifth of those to child cyclists, involved collisions with a vehicles. Source: recent Paper on Injuries to cyclists in Britain by University of Surrey researchers published in the Journal of Injury Prevention and reported by The Independent Newspaper 3.12.09.