



London Living Streets Group
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Re: City For All Londoners Consultation

London Living Streets is a new group dedicated to making London one of the world's best cities for walking. We believe that the arrival of a new Mayor for London and his support for Healthy Streets means there has never been a better time to be campaigning for walking to be placed at the heart of how Londoners get around.

Introduction

London Living Streets supports the overall vision shown in *A City for All Londoners*.

We particularly **welcome the Healthy Streets approach** outlined in Part One for Central, Inner and Outer London, including **all of London's local town centres and high streets**. This proposes a "feet-first' approach; safe and accessible streets; iconic places free of traffic; vehicles that do remain are clean; and reduced motorised traffic volumes" (see figure 2, p. 31).

However, **we urge the Mayor to be bold to ensure his vision is implemented and London is fundamentally transformed** from what can currently be characterised as an unhealthy, vehicle-dominated city where over 60 pedestrians are killed on the roads annually and with illegal levels of air pollution and high levels of obesity (in particular amongst children) to **a safe, healthy city for people to walk and enjoy excellent car-free public spaces along with residential neighbourhoods that are not dominated by through traffic or parked cars**. This approach has the advantage of helping reduce social exclusion and furthering the aims of the *City for All Londoners* document since policies which prioritise walking, cycling and public transport will favour those who are less affluent.

We see key elements of the strategy in relation to people walking as being:

- 1. To create a high quality walking environment and public spaces – in fact a city for people;**
- 2. To reduce the danger to people from motor vehicles** as well as their impact and the intimidation they cause.
- 3. Liveable residential neighbourhoods** which promote people spending time outside their homes and encourage children to be more independent from a young age.



Detailed Response

We agree with the statement in *A City for All Londoners* that requirements and solutions in Central, Inner and Outer London will be different and recommend the following specific measures:

- **In Central London to create walking routes between key places with good crossings;** these should be developed with low traffic volumes. For example, the Mayor should implement Sir Terry Farrell's plan for the Nash Ramblas walking route idea between Regent's Park and St James' Park or encourage improved movement along the Thames Path at London Bridge with a broader cantilevered Paths out over the river as proposed by Team London Bridge.
- **Ensure historic squares are high quality car-free parts of the public realm.** In Central London, places such as Berkeley Square, Clerkenwell Green and Finsbury Square should cease to be roundabouts and car parks and become more like Fitzroy Square, Russell Square and Bedford Square. The work of LB Camden in improving its squares is exemplary.
- **Implement the Healthy Streets Approach which sets out what is required to make streets and areas safer, healthier, and more attractive locations for shopping, recreation and socialising.** This approach would include:
 - **Creation of wider pavements on selected streets where there are particularly large concentrations of pedestrians** such as near railway stations/selected shopping streets;
 - **A regime of street crossings which exceed minimum levels** in terms of frequency, waiting times and crossing times;
 - Adoption of planning policies which ensure new developments build in far more pedestrianisation and facilities to make newly areas more attractive to those on foot;
 - **In Inner and Outer London: ideas might include** removing the Bricklayers Arms and Bow flyovers; building the foot/cycling bridge between Rotherhithe and Canary Wharf; and
 - **Plans to increase levels of walking to school and children's outdoor play opportunities** such as closing roads near schools to through traffic in the morning and afternoons.

We note that improvements to walking infrastructure have had impressive effects. For example, Hungerford Bridge and the Millennium Bridge have helped the South Bank and the Thames Path become the success they are today. Future projects can have similar effects.

- **Reduce private motor vehicle traffic and redistribute road space to pedestrians, cyclists and public transport.** Motor traffic is both dangerous and intimidates pedestrians, who are less likely to walk where there is heavy traffic. In 2014, 1.25 million people entered Central London daily during the morning peak. Only 65,000 of these came by private car. But London's road space is to a great extent designed to cater for the privileged 5% of commuters. We recommend that the Mayor free up road space for pedestrians and others by taking whatever measures are necessary
- to significantly reduce the number of private cars commuters entering Central London as well as reducing traffic in Inner and Outer London.



Private motor traffic should

be reduced by the following measures:

- **Recognising a hierarchy of users which prioritises people walking or cycling**, in accordance with NICE guidance;
- **A London-wide road pricing scheme that more fairly reflects the impact of the use of private motor vehicle journeys**; this is particularly relevant as an increasing proportion of London households do not have a car; and in some boroughs the figure is less than one third.
- **A workplace parking levy**;
- Wider and more quickly introduced ULEZ/T charging zone with fewer exemptions for groups such as residents than are currently being proposed;
- **Changes to parking policies**, including fairer pricing for the use of the kerbside; measures could include: paying more fairly for residential on-street parking that clutters our streets and reduces the range of alternative uses for this space; emissions based-charging to encourage the adoption of lower emissions vehicles; reducing the number of paying parking spaces in key locations; and planning policies which reduce parking spaces at new developments. A proportion of income from residential parking permits and parking penalties in CPZs should be allocated for street enhancements such as greening, seating and clutter removal; and
- We urge the Mayor to spell out how he plans to reduce the growth in minicabs and motor vehicle movements associated with freight delivery and to provide more detail on plans for freight consolidation and last stage delivery modes of transport;
- Reversing the decision to build the Silvertown Tunnel.

The redistribution of road space should take the following forms:

- **Pedestrianisation of key streets/places**, not only Oxford Street, but also Parliament Square (as promised in the Mayor's manifesto) and the Strand in front of King's College and St Mary le Strand;
- **Removal of gyratory systems throughout London**, for example at Holborn and Newington Green; and
- **Implementation of more high quality Quietways, and Mini-Hollands in Inner and Outer London.** The widespread introduction of Liveable Neighbourhoods. These can and should be designed to bring significant benefits for pedestrians as well as cyclists. London Living Streets will work with the London Cycling Campaign to ensure this is the case. TfL should not accept as Quietways the use of roads (or sections of roads) which exceed 2,000 motor vehicles per day unless those who cycle are segregated from vehicular traffic; and
- **Regular car-free days.**



- **Improve pedestrian safety.** In 2015, 66 pedestrians were killed in London and a further 664 were reported as seriously injured. We are extremely pleased that the Mayor is proposing to adopt a Vision Zero policy towards road danger in London. To be effective and to reduce road danger at source, this will include:
 - **Adoption of a default 20mph limit (with appropriate exceptions) within the north and south circular roads;** this would include appropriate sections of the TLRN that are highly used by pedestrians as well as motor vehicles (eg that part of the Edgware Road that sits in the City of Westminster).
 - **Rigorous enforcement of illegal and dangerous driver behaviour** including drivers using mobile phones, speeding (both excessive and inappropriate) and intimidation caused by drivers.
 - **Trials of average speed cameras on non-arterial road locations** in London and locations with 20mph and 30mph limits. The bridges across the Thames would appear to be ideal locations as they have just one entrance and exit for vehicles and are characterised by high vehicle speeds immediately adjacent to both pedestrians and those who cycle.
 - **High quality investigations of the causes of road crashes** and the steps needed to reduce their number and severity;
 - **Use of new vehicle technology to ensure adherence to the speed limit** and the extension of the principal of duty of care from mandating new buses to adhere to the speed limit (through the bus ISA) to all of the fleets that TfL oversees. As TfL is doing in relation to air quality, TfL should ensure that new vehicles that are part of the taxi and PHV and goods vehicles and HGVs are fitted with mandatory ISA; and
 - **Bring forward the implementation of his programme to improve HGVs safety.**

We also urge the Mayor:

- **To ensure that all of the London boroughs 'come to the party'** in creating a City for All Londoners. There are a number of examples of boroughs such as Camden and Waltham Forest that have boldly sought to prioritise the needs of those on foot and active travel more generally. There is a real need for all boroughs to be part of his agenda.
- **To encourage the Royal Parks** to improve conditions for pedestrians by reducing traffic levels and traffic speeds. The Mayor should use his influence to encourage trustees to have an interest in and knowledge sustainable transport and the benefits that resultant reduced air pollution can have for biodiversity in these green spaces. It appears incongruous for the parks to be surrounded by streets that have a 20mph speed limit (eg Regents Park and LB Camden) but for the speed limit to increase as vehicles enter the park itself.



- **To focus on town centres.** Extensive research by TfL shows that town centres and high streets are a major source of pedestrian danger and the Pedestrian Town Centre Pilots are a way of testing possible innovative approaches to reduce road danger and to make these locations more attractive to people on foot. We welcome the 'learning' approach adopted in the pedestrian town centre pilots and would like TfL and, where appropriate, boroughs to make full use of opportunities presented for instance by streetworks to gather data on potential for mode shift away from driving to active travel modes. We would like make use of this awareness of the significance of these town centre and high street locations and focus engineering and enforcement efforts to reduce road danger in these locations as a priority.

While supporting the thrust of the vision set out in a *City for All Londoners* we are concerned that two key issues are overlooked, namely:

- **Childhood Obesity:** a major public health problem for London is the epidemic of obesity and in particular amongst young people. We note that a number of valuable strategies are proposed to support younger people but this issue does not appear to feature. In the latest release (dated 3rd November 2016) of the National Child Measurement Programme for the 2015/16 school year in England¹, the combined proportion of Year 6 children who are overweight and obese is 34%. In London the average is 38% and in three boroughs (Barking & Dagenham, Greenwich and Newham) this figure is over 43%. This feels like an issue that requires some conscious focus as well as strategies that not only address issues around food consumption but also levels of activity and the role that our streets and transport system can play to increase activity in the daily lives of children and young people.
- **Policing & Crime.** We note the absence of strategies in the document in relation to policing and crime with respect to the illegal behaviours of vehicle drivers. Policing strategies tend to focus on property crime i.e. 'crimes' against cars such as vehicle theft and vandalism without addressing crimes by drivers such as speeding, hit and run incidents, driving illegally with no insurance or licence, driving distracted, drink driving and driving polluting vehicles – all of which seriously affect pedestrians. Further, we highlight the epidemic levels of 'hit and run' crashes in London, a significant cause of death, injury and intimidation of pedestrians and cyclists. We feel that the lack of reference to tackling driver behaviour is a significant omission in both the Policing & Crime consultation and in this document, and that Londoners should be given an opportunity to state their views on these critical criminal issues that affect them as pedestrians. Ensuring that policing of driver behaviour effectively addresses the issues we have outlined is essential if our streets, which form the majority of London's public realm, are to play their part in forming a city which is truly 'one for all Londoners'. Overall we do not feel that the aim of Vision Zero can be effective without genuine joint working between the GLA and the other key participants namely TfL in relation to engineering our roads and streets to be safer, the boroughs who control 95% of London's roads and the Metropolitan Police in their enforcement role.

¹ <http://digital.nhs.uk/pubs/ncmpeng1516>