

London Living Streets response to draft Mayor's Transport Strategy (MTS)

Text in bold red indicates London Living Streets' Support for, Dissent from, Caveats, and Suggestions for the MTS to take on board.

Overarching statement from London Living Streets:

London Living Streets is the London campaigning arm of Living Streets which is the national charity for everyday walking. The London group aims to be a voice for people seeking to improve conditions for walking in the capital and is made up of the members of Living Streets borough groups across London and other individuals who are interested in these issues. We have based this consultation response on the draft MTS itself, a meeting in July at which we discussed these issues with Mike Keegan from TfL and a meeting in September at which we discussed these issues with the Walking & Cycling Commissioner Dr Will Norman. A draft response was then created and then circulated to members for comments. Where appropriate these have then been incorporated into this response.

As will be seen, **we are generally supportive of the policies and proposals set out in the draft Mayor's Transport Strategy, although there are several that we object to.** We particularly welcome the use of the 'Healthy Streets' approach as a framework for the MTS, and a 'driver' for change in the use and culture of London's streets.

We would like the opportunity to discuss our views with TfL, including specific elements such as our suggested measures to reduce private motor traffic capacity whose dominance of London's roads continues to be a significant barrier to the implementation of the pro-people policies that the MTS aspires to.

We would summarise our response as follows:

Chapter	Consultation Question
3. Healthy Streets and Healthy People	Q4. Proposal 1 (pp 48 & 49). The flagship Liveable Neighbourhoods agenda should be allocated more than the proposed £86 million over 5 years
	Proposal 2 (p 50). We support pedestrianisation of Oxford Street and Parliament Square; and of the Strand around Somerset House.
	Q5. Proposal 11 (pp 66 & 67). We object to motor cycles in bus lanes, for the reasons given on page 7 of our detailed response.
	Q8. Proposal 19 (p 83). Stronger proposals on congestion charging are needed with the emphasis placed on road user pricing. To meet the ambitious targets of the MTS and to create a context that supports active travel across London, proposals should be developed more quickly.
4. A good public transport experience	Q16. Proposal 67 (p 166). A systematic review of walking access to tube and rail stations is needed to support increased tube and rail travel.
	Proposal 73 (p 187). Taxis and PHVs should pay congestion charges, as private vehicles do.
5. New homes and jobs	Q19. Proposal 78 (p 202). We have developed a proposed Central London Walking Network.

	Proposal 88 (p 216). We oppose the Silvertown Tunnel.
	Proposal 90 (p 219). We oppose further crossings for motor vehicles of the river in East London.
6. Delivering the vision	Q22. Proposal 102 (p 269). We urge the Mayor to press boroughs for Workplace Parking Levies to fund elements of the strategy.
	We oppose seeking funds for on-road advertisements which by their nature distract drivers and increase danger.

Chapter 1: The Challenge

Q1 (p. 15)

We think that this chapter succinctly characterises the key challenges with respect to transport planning for Londoners, now and to 2041.

We support the recognition: of the key role of enabling walking and cycling in addressing London's physical inactivity epidemic, a dominant source of premature illness and death; of **the need for seamless interconnection of public transport services with active travel**; and **that car dominance and dependence must be reduced**, for a number of cogently outlined reasons.

We welcome the highlighting of road transport's (and particularly cars') contribution to air pollution in London.

We welcome the recognition of the asymmetry of risk posed by motor vehicles to people, with the MTS's highlighting of recent trends in road deaths and injuries in London **showing a relative shift in risk from drivers to pedestrians and cyclists**. We applaud and support the conclusion that: "... London's future must be planned around active and inter-connected lives". Achieving this will ensure that London truly becomes 'A City for All Londoners'.

Chapter 2: The Vision

Q2 (p37)

We strongly support the Mayor's overall vision. We recognise that the MTS is a very ambitious programme and that it will need to win acceptance from Londoners generally, as well as key stakeholders such as national and local government. This will take sustained effort and political leadership and commitment. **We accept the proposed target** (of 80% of trips by active travel / public transport by 2041) but **in our view the proposed time frame for removing diesel vehicles and for developing an integrated road user charging scheme is too long and these measures should be introduced far more quickly.**

We note also, with respect to the latter, that **the Mayor in his draft Environment Strategy, has recently called for the introduction of road user charging, and we welcome this.**

We further propose that the Mayor report publicly on MTS implementation annually, and include identification of barriers to progress that may emerge, in order that these can be quickly addressed.

Q3 (p 37)

Minimum 20 minutes of active travel for all Londoners: We warmly welcome

this aim and will do all we can to help achieve it well ahead of the timescale set.

Vision Zero targets: We welcome the Mayor's aim of reducing road danger from buses (by 2030) and elimination of all Londoners who are killed or seriously injured by 2041. However **we think that Vision Zero needs firming up re enforcement action and related issues such as the tackling the damage and intimidation that motor vehicles cause for people on foot and who are cycling.** For instance we think that TfL should use its (potentially very powerful) procurement/contracting powers to raise safety standards, including the use of ISA in taxis and the other fleets that TfL has oversight of (eg delivery vehicles, fleet vehicles and goods vehicles). We would point out that a strict duty of care exists in law in relation to pedestrians (in terms of their safety and health) as they are affected by the activities and the policies of TfL who control the roads, buses and cabs in London. Again this can help strengthen the proposals that TfL can make in relation to the introduction of Vision Zero policies and proposals.

We understand that a 'daughter' document setting out the Vision Zero Strategy to flesh out goals outlined in MTS is in preparation, and **London Living Streets will be pleased to assist in developing the document.**

A central element of these two aims should be to move to a 'default' 20mph speed limit for the whole of London which achieves high levels of compliance. **In our view, the draft MTS does not stress sufficiently the benefits of lower speed limits and 20mph limits in particular. Indeed, it is often on TLRN roads that the problem of too high a speed limit is encountered.** We think that the MTS needs to be more robust regarding reducing speed limits, and actual speeds, on its own TLRN roads and in locations where the 'place' function is high.

We further suggest that the final version of **the MTS needs to give more consideration to the particular needs of children** (especially children's independent mobility) in the way our city's streets are designed and managed. A small child's view of the road is often blocked by parked cars and other motor vehicles; and emerging evidence shows that younger children's spatial and cognitive perceptions differ from those of adults, especially with respect to their perception of vehicle speed. We think that, for the sake of London children alone, there is a very strong case for enforcing 20mph speed limit with average speed cameras and supporting it wholeheartedly with changes to road design that increase compliance with lower speed limit. The knowledge contained in the TfL 20mph Toolkit should also be disseminated to the borough especially when schemes are funded by TfL.

'Zero emission' buses and other motor vehicles: Whilst **we obviously support the aim of reducing emissions from all motor vehicles in London** (and London's entire transport system), we think that **the terms 'carbon-free transport' and 'zero emissions' are used rather loosely in the draft MTS.** They are not really accurate as they ignore substantial carbon embedded in vehicle manufacturing and non-tailpipe particulates, so need to be qualified more prominently in the final version of the MTS.

Target for 2041 reduced motor traffic: We strongly agree that motor traffic volumes need to be substantially reduced. We welcome the recognition that one aspect of car dependence is that many current car journeys are very short, could easily be made by other (healthy) modes, and create congestion for freight and bus traffic. Currently, London roads are generally self-regulating via the amount of 'pain' (congestion and delays) that drivers experience - and as our response indicates, do

not work efficiently for anyone. **We emphasise the need for 'lock-in' of mode shift in the changed design and management of London's streets**, in order to ensure that freed-up road capacity is not recaptured by motor traffic, and to sustain mode shift to active travel and public transport. We think that the MTS should refer to this point and have made some further suggestions under 'Additional comments' at the end of this submission.

To open Crossrail 2 by 2033: We support

Creation of London suburban metro by the late 2020s, via devolution of these services to Mayor: We support. We welcome the success of rail services under TfL's control, notably the London Overground, and agree that improved public transport such as this helps support active travel modes. As with Crossrail 2, this measure has significant potential to reduce car dependence across London.

Better transport accessibility, including reduction in time disadvantage by 2041: We welcome the Mayor's aim to greatly improve the accessibility of London's transport system by 2041, and note that this will require concerted actions by a diverse range of players, involving a wide variety of changes to current policy and practice. We think that the proposed timescale of step-free access to tube and rail stations should be accelerated. A test of the overall accessibility of London's transport system will be its effect on the health and wellbeing of London's children, as noted above.

As can be seen from the above responses, we broadly agree with the aims set out in this Chapter.

Chapter 3: Healthy Streets and Healthy People

We very much welcome the Healthy Streets Approach which it is proposed will underpin the Mayor's Transport Strategy.

We heartily agree with the introductory statements to Chapter 3 (p. 39), noting **the huge potential impact of a shift to designing streets for people, on Londoners' health and quality of life.**

We strongly agree that improving the experience of moving around by active travel modes and being on London's streets, via **the Healthy Streets Approach**, **represents a 'win-win' for all Londoners.**

We are excited by the huge potential for mode shift from car use to active travel and are pleased to see the Mayor's recognition that this will require a holistic approach to streets and the wider street networks, prioritising active travel modes (p. 40).

We think that the Focus on: Health Benefits of Active Travel (p. 42-45), including the summary statistics on physical activity associated with different travel modes, together with the substantial morbidity risk reduction of several major NCDs, is a very convincing and valuable element of the MTS.

We set out our comments under each of the MTS's three sections in this Chapter as follows:

a) Active, inclusive and safe travel (p. 46-)

We agree that, hitherto, walking has been a largely unrecognised and undervalued mode of transport. We welcome the Mayor's recognition of this.

We acknowledge that the MTS is a very ambitious programme. This leads us to suggest that more focus will be needed, in order to ensure that it is delivered, on the city's culture - and particularly on the (currently toxic) roads culture (see p. 47) that forms such a barrier to active travel.

We strongly support Policy 1. We support Policy 1's associated **Proposals (1-8).**

1) Street environments that encourage walking and cycling (p. 47-55)

Proposal 1. Support. **We very much welcome the Liveable Neighbourhoods scheme although we have some concerns about the relatively small size (£85.9M over five years) currently allocated** to it. This suggests that 'thinking smarter' about streets will be the driving criterion for success of Liveable Neighbourhoods schemes. We especially welcome the Mayor's commitment to ensure that "... any scheme being undertaken on London's streets for any reason improves conditions for walking and cycling". (Proposal 1(e)).

Proposal 2. Support. **We have long advocated for the transformation of Oxford Street and Parliament Square**, and we urge the Mayor to proceed with these schemes. **We also suggest the Strand in the area around Somerset House** as a candidate for pedestrianisation and the removal of bus movements to the Aldwych to the north is proposed to allow complete pedestrianisation of this increasingly attractive and walking friendly area (with Kings moving into Bush House). **We offer as a practical contribution to making the Central London boroughs more walking-friendly our Central London Walking Network proposal** (see attached document) which has been discussed with both the GLA and TfL. More generally the example of the success of the closure of The Mall on a Sunday should lead London to be bold about regular closures of the places that are aimed at leisure uses and high footfall. London lags behind other UK cities in the number of streets that have been pedestrianised. The usage of motor vehicle of the Royal Parks is an anomaly that should be addressed and, as well as reducing vehicle speeds to a maximum of 20mph, consideration should be given to their removal in particular in those situated in Central London.

Proposal 3. Support. **A high-quality, dense, inclusive cycle network** will be essential if the MTS is to achieve substantial mode shift away from private motorised transport to active travel.

Proposal 4. Support. Although recreational walking is not our primary focus, **we welcome the Mayor's commitment to "protect, improve and promote the Walk London network and create new leisure walking routes"**. Clearly, routes designed with recreational walking in mind, as well as being a positive feature in themselves, can provide useful and pleasant sections of routes for local everyday (utility) walking. Excellent, well maintained 'on the ground' wayfinding and mapping are both essential to support such routes.

'Focus on: Walking and Cycling and the Healthy Streets Approach', p. 54-55.

We think that this presents an attractive outline vision of how London's high streets and town centres could be greatly improved for people. With respect to 1. 'Making streets easier to cross...' (which links to lower traffic speeds, see 8. 'Reducing speed

limits to 20mph...'), **we wish to highlight some suggestions we have for pedestrian crossings, as follows:**

- **in Outer London especially, essential crossings are still sometimes non-existent.** This presents obvious barriers to children walking to school, and people reaching destinations on foot generally. We suggest a thorough review of intelligence and other information available to TfL and boroughs to identify such gaps in provision and prioritise for action.

- **Operation of signal controlled crossings.** **We ask the Mayor and TfL to facilitate the project on 'wait time' at standalone signalised crossings led by Dr Mike Grahn under the auspices of London Living Streets.** This exploratory project has great potential to better improve the functioning of crossings for pedestrians and also motorists. Another key aspect of signalised crossings is the time to cross for pedestrians. We note recent research showing the inadequacy of currently assumed walking speed used to set the crossing period.

We further propose that TfL develop a London Design Standard for an ideal walking-friendly high street (typically with buses along it and with shops on both sides). This would be applicable to high streets, town centres and shopping streets across London. Elements we would like to see covered in such a design standard would include: **width, pedestrian crossings and a clear preference for direct, single stage (rather than multi-stage) pedestrian crossings, Copenhagen crossings of side roads, far shorter waiting times for pedestrian particularly when there a significant time elapse since pedestrians were permitted to cross on a green man, good walking conditions in the hinterland, street furniture and planting, air pollution monitors, seating, mini-parklets** e.g. as in Tooley Street and Brenda Puech's pop-up parklet in Hackney / Tower Hamlets, together with an enforced 20mph 'default' speed limit.

We welcome the significant reallocation of space to active travel illustrated; this will do much to enhance the comfort and safety of all users and minimise potential for conflict.

2) Making it easy to get around on foot or by bike (p. 56-57)

Proposal 5. Support. Walking- and cycling-specific wayfinding, such as Legible London, which we have long championed, is relatively inexpensive and is extremely helpful, especially to visitors to a locality. **We propose that,** in addition to the measures in Proposal 5 a), that **the Mayor commits to ensure that all TLRN and borough roads are adequately provided with street nameplates, including at all arms of junctions on all streets,** to ensure instant legibility for pedestrians and cyclists. In some cases, street nameplates could be funded by developers via Section 106 and CIL monies.

We welcome TfL's transparent approach to open data, as a way to tap into London's tech community and to help people plan journeys and move around London's street network, via online navigation tools.

Proposal 6. Support. TfL's cycle hire scheme has been a very welcome recent addition to London's sustainable transport mix. **We would like to see the scheme expanded geographically, to enable more Londoners to benefit directly.** We also think that **expanding the cycle hire scheme to include e-bikes would be helpful in widening access to the cycle hire scheme** (especially in hilly areas) to

a bigger range of people, including some disabled people, and in light of the ageing population referred to on page 13 of the MTS. **We think that the 'default' presumption of future cycle hire docking stations should be to locate them on the carriageway.** In other words, assume that they will be located on the carriageway, design for this, and only place on the footway if there is an overriding reason for doing so. This would support reallocation of road space to active travel modes, in line with the MTS.

O-bikes and other similar schemes 1. We see these as potentially very positive. 2. They demonstrate unmet demand for cycling and help address some major barriers such as lack of provision for residential bike storage. 3. They should prompt TfL and boroughs to increase cycle parking and reallocate on-carriageway car parking space to cycle parking.

3) Promoting walking and cycling for all Londoners (p. 58)

Proposal 7. Support. We agree that promotional work, in association with improved environments for walking and cycling, will be helpful in supporting mode shift and helping reduce health inequalities. We particularly welcome the statements on p. 58 spelling out the links between the physical activity needs of children and the street environment, and the 'Healthy Routes' concept for schools and workplaces.

Proposal 8. Support. We see this as an essential element of much-needed culture change across our city. In our experience, boroughs are often reluctant to trial closures of streets to some or all motorised through-traffic, in spite of the existence of **the Experimental Traffic Order mechanism**, and so **we propose that TfL work with London's boroughs to encourage them to make much more use of this measure.** We see both temporary and permanent street 'closures' (or, 'openings', from people's perspective) as essentially public health interventions. Our impression however is that the MTS over-focuses on 'one-off' street closures and we have a concern that these are insufficient to demonstrate to the public the benefits of closing some streets to motor traffic. **We suggest therefore that the MTS needs to firm up its proposals around street closures.** Could TfL provide guidance to boroughs on consultation procedures i.e. how to incorporate trial closures and gather evidence from them?

Focus on: Buses and the Healthy Streets Approach, p. 60-61

We welcome the acknowledgement that public transport and active travel are complementary and agree that London's buses play an important role in delivering the Healthy Streets Approach. **We urge the Mayor to continue and accelerate TfL's work on improving bus safety and on 'cleaning up' London's bus fleet.** Given the clear synergy between active travel and buses, we have made a number of suggestions to enhance journeys undertaken multimodally. We would emphasise that every aspect of multi-modal transport needs to be carefully considered, and made as easy, safe, informative, accessible and pleasant as possible, in order to achieve mode shift from private motor vehicles.

We strongly support Policy 2, 'Vision Zero to tackle road danger'. We particularly welcome the statement on p. 60 that "Vision Zero means that road danger will be targeted at its source...". In our view this is exactly the right approach. **For more information, we have set out our views on Vision Zero in the attached in a 20's Plenty and London Living Streets 'Vision Zero' policy statement** (attached) and again this has been discussed with both the GLA and TfL.

Proposal 9. Support. We look forward to working with TfL on all elements of this, including Proposal 9 c) on the Direct Vision Standard for HGVs, given that lorries are disproportionately dangerous to people walking and cycling in London.

Proposal 9 d) We wish to see a far greater emphasis on the role of the Police in enforcement at the very least in tackling the 5,000 injuries/year resulting from 'hit and runs' in London which is a statistic that is totally unacceptable.

Proposal 10. Support. We look forward to seeing the forthcoming Vision Zero programme and to working with TfL and others in supporting its implementation. Annual progress reports will be extremely helpful in monitoring progress and ensuring the best targeting of resources.

'Focus on: Motorcycling Safety' and Proposal 11, p. 66-67

Whilst we share the Mayor's concerns about the safety of people using motorcycles, **we do not support Proposal 11 c), regarding the reallocation of road space (bus lanes) to motorcycles. Our views and counter-proposals are as follows:**

Currently, 12 boroughs allow motorbikes to use bus lanes on borough roads; 21 do not. **In our view, allowing motorbikes to use bus lanes is not compatible with the Healthy Streets perspective,** which prioritises human health and quality of life. **Nor is it compatible with the MTS priority to improve the reliability and quality of Londoners' public transport experience when travelling by bus** (see, MTS Chapter 4).

We therefore propose that the MTS should commit to using what points of leverage TfL has to discourage boroughs from allowing motorbikes into bus lanes. If motorcycles are permitted to use bus lanes more generally the quid-pro-quo should be compliance with the speed limit. It is unacceptable that in lieu of segregated cycle lanes, people who are cycling are encouraged to use bus lanes and now they are expected to share this with motorcycles which regularly exceed the speed limit to an enormous extent.

More generally the contra-arguments to legitimising PTW use of bus lanes are:

- Rising proportion of motorcyclist involvement in the numbers of pedestrian who are killed and seriously injured in London
- No convincing evidence bus lanes improve motorcyclists' safety
- Evidence of motorcyclists speeding in bus lanes
- Bus lanes are generally nearside lanes therefore strongly affect pedestrians
- Healthy Streets - one dimension refers to noise. Incompatible with motorbikes in bus lanes
- Motorbikes reduce opportunities/generally make it harder for pedestrians to cross road
- A particular problem for children, disabled and elderly people in part arising from nature of motorbikes (slim front profile makes them harder to see and judge approach speed, high power-to-weight ratio contributes to higher speed)
- Motorbikes problematic for cyclists (affect perception of safety); opposed by LCC
- Allowing motorbikes into bus lanes is reallocating road space to private motor vehicles – contrary to the general thrust of the draft MTS

'Focus on: Improving personal safety and security', p. 68-89

Policy 3. Support this and associated Proposals 12, 13 and 14

With respect to **Proposal 14**, whilst it is of course impossible to wholly guarantee London's safety, we think that the current threat posed by planned use of motor vehicles as weapons could be reduced by a much greater emphasis by TfL and boroughs on restricting motor vehicle access to and speeds in streets and public places.

b) Making more efficient use of the street network (p. 70-)

We strongly support Policy 4 (re prioritising space-efficient modes). We would like to see a clear re-statement, for the avoidance of doubt, of the hierarchy of modes in the final MTS. We think that the measures outlined in **Proposals 15-17** will be useful in reducing congestion and improving the efficiency of London's streets. **We suggest that more Londoners could be enabled to 'give up their cars' per Proposal 17 if on-street secure cycle storage were much more widely available, access to cargo-bikes improved, and cycle carriage on trains** (e.g. to allow families to easily and sustainably get out of London for leisure cycling) were significantly enhanced.

'Focus on: Opportunity to reduce car use', p. 76-77. We agree with the conclusion that non-car (or, perhaps a better term, 'car free') travel options need to be made more attractive, in order to reduce car use.

Given the evidence presented in MTS p. 75-82 and elsewhere, **we think that the Congestion Charge and other charging schemes need to be reviewed more urgently than is implied in Proposal 18**, if the MTS is to be successful. We urge the Mayor to strengthen **Proposal 19**, re next generation road user charging systems. **Road user charging is the one policy that can have instant impact on mode shift.** (We therefore welcome the support for road pricing given in the Mayor's Environment Strategy). **We think that the early introduction of workplace parking levy schemes is also required.**

Proposal 20. Support but with two concerns. One is **whether there will be sufficient LIP funding from TfL for boroughs to invest in schemes, such as traffic reduction strategies**, needed to deliver the radical transformation the MTS aims for - given that, in recent years, LIP funding has been either frozen or falling. Secondly, **we are uncertain whether it is realistic to think that boroughs can engage in traffic reduction strategies on a borough-specific basis.**

Proposal 21. Support, although please see comments below.

We are not clear how (some) London boroughs will be brought on board with respect to Proposals 20 and 21, although the suggestion is that TfL will 'work with the willing' and make best use of LIP funding (highlighting the need for 'tight' conditions attached to such funding). This however has the potential to increase inequalities. Some of the boroughs where walking conditions are most badly affected by traffic may be reluctant to change their - palpably unsuccessful - approach.

'Focus on: Borough Traffic Reduction Strategies', p. 84-85

We broadly support the approach outlined here, albeit with the caveats

mentioned above, including the recognition that realistic and convenient (motor-free) travel options need to be available to enable people (and freight) to move around London. Clearly, LIP guidance will be key, and the implementation of LIP-funded schemes will need to be carefully monitored. We very much welcome the reference on p. 85 to 'filtered permeability' and the rationale for this measure. **We think that TfL needs to do more to help borough decision-makers and the general public to better understand the concept of filtered permeability and how it could be more widely applied.** There are lessons to be learned from Waltham Forest where the difficulties of the original Walthamstow Village scheme were largely avoided in the subsequent Blackhorse Lane scheme.

c) Improving air quality and the environment (p. 86-)

Policy 5. Support with some caveats – see our comments below under individual proposals.

Proposal 22. Support; however we would wish to see the timetable for implementation accelerated.

Proposal 23. Support. We agree that mode shift to bus use in Inner and Outer London should not be permitted to have unintended consequences with respect to air quality in London.

Proposal 24. Support. We particularly welcome the reference to “additional emergency measures to reduce or restrict vehicle use...”. It is not acceptable to continue to expect people using active travel and public transport modes to curtail their activities while allowing other people to contribute to air pollution via driving during episodes of poor air quality.

Proposal 25. Support. We welcome the acknowledgement in the preceding statements on page 90 of the potential of 'Liveable Neighbourhoods' to reduce air pollution at source.

Proposal 26. Support, with qualification. Diesel vehicles are injuring the health of all Londoners including pedestrians, and so reducing pollution caused by such vehicles is an urgent priority for London Living Streets. A key issue for London Living Streets is how a diesel scrappage scheme is designed. **We support the idea of a scheme which is designed to reduce emissions by favouring non-polluting (or low-polluting) modes of transport.** For example we would wish to see other measures incorporated to incentivise non-polluting/low-pollution modes such as direct support for cargo bikes, vouchers for use on public transport. In other words we would like to see any such scrappage scheme to be taken as an opportunity for a fundamental radical shift in how people move around London, in line with the Healthy Streets Approach.

More generally we believe that the time has come for consideration of financial incentives to be given to people to walk or cycle. Verification could occur through phone usage data and there should be consideration for discounts from people's Oyster card (or debit credit card equivalent) or straight financial incentives. The sums that are cited in the draft MTS as to the impact of people walking and cycling and taking public transport and the link to economic and physical wellbeing mean that incentives for active travel would pay back with interest if a pan-London and holistic approach were taken to encouraging change in travel patterns from car use to active travel.

Policy 6 (p. 92-). **Support a move to zero carbon by 2050.**

We strongly agree that climate change and air pollution are inherently linked and therefore need to be considered together. Our overall approach is to seek a significant reduction in the number of motor vehicles across London, as part of an industrial-scale shift to walking, cycling and public transport. We welcome the Mayor's acknowledgement that London is failing to meet the WHO-recommended maximum safe level of PM_{2.5} particles, underlining the need for further action.

Proposal 27. Support.

Proposal 28. Support.

Proposal 29. Support.

Proposal 30. Support – we agree that public bodies should lead by example.

Proposal 31. Support.

Proposal 32. Support, with the caveat that charging and refuelling installations should not be permitted to reallocate space from pedestrian infrastructure e.g. footways.

Proposal 33. Support.

Proposal 34. Support. We note that this measure does not include road wear, a source of particulate air pollution. We strongly agree with the supporting statement on p. 99 that the first step to reducing PMs from motorised road traffic will be to achieve substantial mode shift to walking, cycling and public transport, and to more efficient delivery and servicing.

'Focus on: Reducing emissions from non-road transport services', p. 100-103

Proposal 35. Support. We think that this is incompatible with development of Silvertown Tunnel which facilitates movement by private motor vehicle.

Proposal 36. Support.

Proposal 37. Support.

Proposal 38. Support.

Proposal 39. Support.

Proposal 40. Support. We welcome this kind of evidence-based approach to policy and practice.

The Figure 14 on page 103 is a useful reminder of the scale of the ambition of the MTS and the effort that will be needed to decarbonise surface transport in London by 2050.

'Focus on: Natural and built environment and climate change resilience', p. 104-109

We strongly support Policy 7. Historically, some parts of London have been relatively poorly provided with green infrastructure and identifying gaps could help direct efforts in addressing this. Green infrastructure includes street trees and small scale planting on streets. **We think that informal community organised street planting (guerrilla gardening) should be actively encouraged.**

Proposal 41. Support. We would like the final version of the MTS to give some consideration to the varieties of trees selected for street tree provision, to include edible fruit trees on quieter streets. **We strongly agree that increased provision of street trees and other green infrastructure has multiple benefits for London** including the city's ecology and biodiversity.

Whilst we support Proposal 42, we think that there needs to be much more emphasis across London on not creating impermeable surfaces in the first place. We propose that a fund is created for boroughs to bid for hardstanding to be re-converted to front gardens and for associated pavement crossovers to be reinstated to continuous footways. This would cumulatively have the effect of making walking along some residential streets more attractive and comfortable (and safer), as well as enhancing biodiversity and reducing flood risk.

Proposal 43. Support.

Policy 8. Support. It seems unwise to us that the “equivalent of two-and-a-half Hyde Parks” (p. 106) is permitted to be paved over every year. **The conversion of front gardens to hardstanding and footway crossovers is an example of where external costs of motor vehicle storage are currently being borne by London's public transport infrastructure, as well as by pedestrians.**

We note that active travel modes – walking and cycling – are generally the most resilient, as evidenced by Londoners' behaviour during transport crises and flooding events.

Proposal 44. Support.

Proposal 45. Support, with the caveat that it does not compromise the safety or amenity of walking and cycling (the most resilient modes, as noted above).

'Focus on: Transport noise and vibration', p. 110-111

Proposal 46. Support. Under 'b) **Minimising the noise impacts of vehicular traffic** on streets...' we note that **some London bus engines (eg the 176!) are noticeably noisy.** This reduces the pleasantness of the street environment and needs to be addressed. We also note that the wish to allow motorcycles into bus lanes (See Proposal 11 c)) is likely to frustrate the stated aim of this Proposal.

Proposal 47. Support.

Consultation Questions on Chapter 3 - Healthy Streets and Healthy People (p. 112-113)

Q4 (p. 112)

We think that these plans would achieve a much improved environment for walking and cycling. We have made some further suggestions which we think would strengthen them.

Q5

We think that these plans with the exception of Proposal 11 c) will go some way to reduce road danger and improve personal safety and security. **We propose the 20's Plenty and London Living Streets agreed position on Vision Zero for consideration owing to its practical focus on measures that can deliver the significant reductions in casualties that are required.** We understand that a Vision Zero strategy will be produced by TfL shortly and we hope that this will give more detail and timing on measures proposed.

Q6

We agree that the plans would help ensure that crime (as defined in this context) and the fear of crime remain low on London's streets and transport system, although we highlight the apparent conflict between Proposal 13 and Proposal 11 c). We also think that Proposal 14 should have a stronger focus on minimising loss of amenity to people using active travel modes and that more consideration should be given to removing motor vehicles from people-rich localities.

Q7

We agree that these plans would tackle congestion and improve the efficiency of London's streets.

Q8 (p. 113)

We agree in broad terms with the proposed approach to road user charges but we think that, having clearly set out the urgent case for change, **the Mayor needs to be bolder in proceeding with road user charging in terms of its physical extent** (it should cover the whole of London), the time that is covered (it should be operational 24/7) **and the costs itself** (which should support modal share policies and contribute to the external costs of motor vehicle travel which are overlooked currently).

Q9

Whilst agreeing that motor traffic reduction is essential (hence the key role of an integrated system of road user charging) **we are not certain that these plans will be sufficiently strong to achieve such change.**

Q10

We agree that these proposals are positive but we think that the timescale for implementation needs to be accelerated and that care needs to be taken to ensure that there are no unintended adverse consequences for active travel modes.

Q11

We agree that these plans will be helpful but have suggested some ways in which they could be further strengthened.

Chapter 4: A good public transport experience

We welcome the recognition in the MTS of the importance of an easy to use and accessible public transport system, as a way to provide options for travel which don't rely on the use of a car (MTS, p. 115). This will be a crucial element of achieving the proposed reduction in car use (and associated increase in walking and cycling) across London. We particularly welcome the Mayor's emphasis on a 'whole journey approach' (p. 117), where public transport improvements are complemented by Healthy Streets improvements (p. 117-118). The recognition that "The healthy, sustainable choice must be the easiest option every time, particularly at places where people change between transport modes" (p. 119) is most welcome. **We therefore strongly support Policy 9**, and its supporting **Proposal 48**. **We offer further Proposals for consideration** which in our view would enhance the attractiveness of the 'whole journey experience', as follows:

- **The development and London-wide application of London Design Standards for Walking, parallel to the London Cycling Design Standards (LCDS)**. The wide range of 'gateways' to and from public transport could benefit from the application of proposed design standards for walking.

- **Walking policies complementary to bus policies to facilitate the forecast increase in bus patronage, including pedestrian crossings at bus stops**. The general approach should include locating bus stops nearer to the tube and rail stations that they serve. This would facilitate access for example at stations such as Earlsfield where the southbound bus stop requires negotiation of a signalised junction in order to access the station.

- **Systematic review of walking access to tube and rail stations, to facilitate the forecast increase in tube and train travel**, beginning with an ideal standard. As a recent example of good practice on the approach to a rail station, we highlight pedestrian improvements on Station Rise at Tulse Hill station (widened footways, removal of car parking, planting of street trees).

- **Develop a London standard for an ideal walking friendly high street** (typically with buses along it and with shops on both sides), including width, surface quality, pedestrian crossings, Copenhagen crossings of side roads, good walking conditions in the hinterland, street furniture and planting, air pollution monitors, seating, mini-parklets (such as Brenda Puech's pop-up parklet in Hackney and as in Tooley Street), and of course, an enforced 20mph default limit.

- **Pedestrian-friendly bus stops: Seats, shelters and locations** (near junctions)

We agree with Policy 10 ((see a) **Improving affordability and customer service**, p. 121) that public transport fare levels need to be set to enable access to affordable travel for all Londoners. Perverse incentives which make the marginal cost of driving cheaper and which do not address the external costs imposed by driving need to be removed, in order to reduce Londoners' car dependence. **We strongly support Policy 11**; this is crucial in enabling and encouraging mode shift to active travel. We emphasise that, with respect to 'getting the basics right' (p. 122), **provision of Countdown at bus stops is essential in providing real-time bus information to the general public**. The value of bus Countdown is underlined and increased by the recent use of Countdown to provide up-to-date air quality information. We welcome the support for extending bus Countdown given in the recently published London Assembly report on London's bus network.

With respect to b) **Improving public transport accessibility** (p. 126-), **we welcome Policy 12** and supported the associated measures set out in Proposals 51 and 52. We suggest that the concept of 'step free access' to tubes and trains be extended from just to platforms to include step-free into/out of train carriages. In general terms, **we would like to see TfL's programme of step-free accessibility at tube and rail stations to be accelerated**, in order to make London's transport system navigable and accessible to all.

Re c) **Shaping and growing the bus network** (p. 133-), we have made some specific suggestions which we feel would strengthen **Policy 9**, to make London's bus network more convenient, safer and easier for pedestrians to use. We agree that "Good bus services are fundamental to achieving less reliance on the car and supporting London's sustainable growth" (p. 133) and **support Policy 13**. We strongly endorse the comment on page 133 of the MTS that walking, cycling and public transport are complementary modes, and we very much welcome the role of the Healthy Streets approach with respect to these modes of transport. **We support Proposals 53 and 54**, regarding taking the opportunity to review and reshape London's bus network, and to improve bus journey times and reliability. We emphasise that our general principle is that space (and time) should be reallocated from private motor traffic to walking, cycling and public transport.

d) Improving rail services and tackling crowding

We support Policy 14 and particularly highlight the potential (**Proposal 55**, p. 142) of supporting mode shift to walking and cycling for some journeys instead of (for example) travelling on crowded peak-time public transport services.

With respect to Crossrail 2 and the Elizabeth line, we emphasise that expensive new public transport infrastructure such as this needs to be optimised to enable seamless interchange with active travel modes and a supportive high quality public realm.

We agree that improving rail services in Inner and Outer London has a key role to play in enabling mode shift away from car use, e.g. as demonstrated by the London Overground (p. 155). Measures to achieve this form a practical way of supporting active travel (and other forms of public transport) and **we support** the associated Proposals including **Proposal 61** (p. 157), concerning devolution as a mechanism for improved integration.

We like the concept set out in Proposal 62 of 'mini-radial' hubs and links to town centres and improved orbital public transport connectivity. Proposals 63, 64, 65, 66 and 67 are also welcomed as ways to increase public transport capacity and hence to support mode shift from car-based travel.

With respect to '**Focus on: River Services**' (p. 176-177), **we very much welcome the Mayor's support for more freight on the River Thames**, particularly to reduce lorry traffic on London's roads. Lorries, and especially construction lorries, have proved to be disproportionately dangerous to pedestrians and cyclists in London, and practical measures to enable lorry movements to be reduced are therefore very welcome. **We therefore support Policy 15** and its associated **Proposals 68 and 69**. We note that (**Proposal 69**) the early implementation of river transport services to Barking Riverside would help 'build in' non-car-based travel for new residents from the outset.

We support Policy 16 since this will help reduce the volume of motor traffic being

driven into London.

With respect to '**Focus on: Public transport and the night-time economy**' (p. 184-185), **we support Policy 17** re developing London's public transport services in support. **We note however that currently Night Bus and late night bus services**, referred to on page 185 **are sometimes driven excessively fast when general traffic is light, increasing noise and road danger** to people travelling in the vicinity on foot or cycling. We think that TfL needs to do more to reduce **all** motor traffic speed (including buses) at night, especially at 'hot spots' in London's night-time economy, such as the West End. There are opportunities to track behaviour and enforce against speeding by buses far more rigorously through ibus data ahead of the introduction of mandatory ISA across the fleet from 2018 onwards.

Re: 'Focus on Taxis and Private Hire Vehicles' (p. 186-187), we note that taxis and PHVs occupy significant road space in central London (17% and 10% respectively, on an average weekday) and that they are an inefficient and growing use of highway space. **PHVs should be susceptible to the congestion charge just as ordinary motor vehicles. We agree that there is an urgent need to reduce the (growing) number of PHVs in London and support Proposal 73. We support Proposal 74** with the caveat that 'safe' needs to apply also to other people with whom the taxi or PHV is sharing streets and public spaces. Our overall view on **Policy 18** is that clearly **Londoners need a safe and accessible taxi and private hire service** and that, **although we recognise that taxis have a role, generally speaking they are inimical to pedestrians and they should therefore along with PHVs be de-prioritised as part of the MTS.**

We are surprised that the safety of 'other road users' is only referred to in the context of pedicabs in London (see page 187). Whilst regulation of pedicabs may be needed, the degree of regulation should be commensurate with the danger presented by pedicab operators to passengers and to other road users. We are also surprised at the MTS's highlighting of pedicabs as having a significant impact on congestion, particularly in the West End, given that traffic speeds in the West End are generally low and that 27% of road space is taken up by (polluting) taxis and PHVs. In our view, pedicabs are potentially a useful part of the solution to London's air pollution, and their use and development should be supported.

Consultation questions on Chapter 4 - A good public transport experience (p. 188-189)

Q12

We strongly agree that these plans would provide an attractive whole-journey experience and have made some of our own proposals to strengthen them.

Q13

We agree that these plans would do much to improve customer service and affordability of public transport.

Q14

We agree that these plans would improve the accessibility of the transport system. However we think that they could be strengthened further and have made some suggestions in the relevant section.

Q15

We agree that these plans would enhance bus travel across London. We

would reiterate our general principle that contested space (and time) should be reallocated from private motor traffic to walking, cycling and public transport.

Q16

We agree that this package of proposals would greatly improve rail services by improving journey times and tackling crowding.

Q17

We agree that broadly speaking these plans would deliver a well connected public transport system.

Chapter 5: New homes and jobs

We support the view that “Good growth means offering people across London the benefits of walking, cycling and public transport use that have been available in some parts of London for years” (p. 192). We support the transport principles of 'good growth' underpinning **Policy 19**.

a) Shaping the type of growth (p. 194-)

We welcome the Mayor's proposed approach to create high-density, mixed-use development around rail and tube stations in London, and agree that this has great potential for catalysing “the regeneration of town centres and neighbourhoods” (p. 196).

We therefore support Proposal 75. Further we agree with the importance of embedding active travel in new development (p. 198) and welcome the proposal that (the minimal) provision for car parking be designed to allow future alternative uses as car dependence decreases. **Whilst we strongly support Proposal 76, we think that this will need strong 'teeth' if it is to be robustly upheld and implemented**. What sanctions will be available to the Mayor and TfL to ensure compliance?

As an element of embedding active travel in new development, **we welcome the Mayor's commitments to embed efficient freight and servicing arrangements (Proposal 77)**.

b) Shaping the city (p. 200-)

We welcome the acknowledgement in the MTS of **the critical importance of “.... radically improving conditions for walking and cycling, supporting higher densities.”** (p. 200).

We heartily endorse the statement that “... **the vitality of Central London depends on a good public realm and a healthy and clean environment,** including measures to reduce traffic dominance, improve air quality and deliver far better provision for walking and cycling.” (p. 201). In our view this is long overdue. **We have developed a proposal for a Central London Walking Network which is strongly in accordance with this statement.**

We welcome the reference in the MTS to town centres (p. 201) and the proposed approach to their development as outlined on Page 201, and similarly for Opportunity Areas (p. 202). We therefore support **Proposal 78**. We note in particular the Mayor's expectation that development in the Central Activities Zone, in and around town centres and Opportunity Areas will be subject to planning

frameworks that "... set mode share targets that are significantly more ambitious than elsewhere in London and will require boroughs and other stakeholders to demonstrate how development plans will contribute to mode shift away from car use towards walking, cycling and public transport." **It is important that legacy schemes from the previous administration for such areas - including Opportunity Areas - that are 'in the pipeline' should be reviewed in the light of the policies in this draft MTS and make use of this Healthy Streets approach.** Recently consulted schemes such as Nine Elms Lane, if not reviewed, will embed poor quality environments for **people** for decades.

We welcome the Mayor's commitment to ensuring that suburban land use development is not car-dependent and that it creates a public realm that encourages and enables more walking and cycling (p. 203).

We support Proposals 79 and 80 with respect to creating healthy new places, in association with opportunities for new or improved rail links. **We support Proposal 81** for an 'exemplar' high-density, mixed-use development in the Old Kent Road Opportunity Area, in conjunction with the Bakerloo line extension to Lewisham and beyond.

We support further proposals for rail extensions to facilitate truly sustainable development (**Proposals 82, 83**) and for new rail stations (**Proposal 84**).

We recognise the role of improved bus services in rapidly, and relatively inexpensively, supporting development especially in areas with low PTALs and **we support Proposals 85, 86 and 87**. **However we do not support the proposed construction of Silvertown Tunnel and we therefore oppose Proposal 88.**

We strongly support Proposal 89 for new walking, cycling and public transport river crossings and note that London is lagging behind exemplar liveable cities world-wide (such as Copenhagen) which have already developed numerous new 'active travel' bridges to address gaps and desire lines in the active travel network.

We do not support Proposal 90 (p. 219) on much the same grounds as our opposition to **Proposal 88**. As transport planners will be aware, there is a robust evidence base demonstrating that more road capacity generates more motor traffic - with concomitant road danger, severance and air pollution. Such an outcome is clearly inconsistent with the stated aims of the MTS, including its target of a 33% reduction in the number of car/taxi/PHV daily trips by 2041 (Figure 2, MTS).

Under Proposal 90, what is the technical definition of 'sensitive receptors'? (para f) refers).

We emphasise that road bridges or tunnels in outer east London are incompatible with the general thrust of the MTS, reflect outdated 20th century motor-centric thinking, and are unsustainable. We suggest therefore that it makes more sense to 'park' such proposals, to allow the weakness of the case for currently planned road infrastructure (Silvertown Tunnel, Lower Thames Crossing) to become more apparent, and in the light of planned public transport and other improvements in the area alongside the Mayor's air quality interventions.

We support Proposal 91, with the caveat that future potential for active travel connections of any land so released needs to be protected and enhanced.

We support Proposal 92 and see this as an approach which could greatly help deliver vibrant, healthy and sustainable neighbourhoods.

With respect to **Proposal 93** (possible 'decking over' of the A13 at Barking), **we welcome the Mayor's acknowledgement (p. 221) that large roads and other transport infrastructure can divide communities, create air pollution hotspots and involve substantial land take.** This has clearly been the case for the A13 at Barking. We are supportive of Proposal 93, subject to substantial restriction on the scale of provision of transport capacity. The Mayor's projection of fewer car, taxi and PHV journeys should mean a reduction in motor traffic capacity of London's roads. On average, the motor traffic capacity of London's roads should therefore be reduced by 33%. We look forward to seeing and commenting on the resulting feasibility report on the potential local community benefits of decking over at Barking.

We welcome the explicit reference in the MTS on page 223 **of the requirement to embed "... sustainable travel patterns from the start through good design and place-making"**, alongside the acknowledgement that, to achieve its full potential, **"Crossrail 2 will need to be complemented by a network of streets that enable and encourage walking and cycling..."** (p. 223). The reference to the necessity of tackling barriers to East-West movement via active travel, and the role of active travel modes in supporting local economies, is very welcome. We also welcome the Mayor's acknowledgement of the importance of the 'lived experience' of journeys undertaken by walking and cycling in determining people's travel behaviour.

We support the approach set out on page 225 and Figure 46 **towards Crossrail 2 in SW London.**

We welcome the approach outlined on page 229 and Figure 47 **for Inner East London and the Isle of Dogs**, particularly the support for practical measures to enable and encourage new and existing residents to walk or cycle for short and medium-length journeys – **a key such measure being the Rotherhithe-Canary Wharf walking and cycling bridge.** We concur with the statement on page 229 that, "... to optimise its potential to change travel behaviour and encourage more active forms of travel, any [active travel] crossing will need to be supported by improvements to the surrounding walking and cycling networks..." We also welcome the Mayor's acceptance that high quality active travel infrastructure can directly change people's attitudes to walking and cycling.

We strongly encourage the Mayor and TfL to explore maximising the potential of walking and cycling in association with public transport upgrades to ensure the sustainable development of Outer East London and the Thames corridor (p. 233 and Figure 48). We applaud the statement that: "It is essential that the Healthy Streets Approach is applied to any regeneration activity, to support a shift away from the car..." (p. 233).

We support the Mayor's aim for Old Oak and Park Royal Opportunity Area, where the community has been heavily divided by a number of generations of transport infrastructure, to create "... a new street network using the Healthy Streets Approach to make walking and cycling the first choice across the area." (p. 237).

We would add here that proactive management of the developing and changing walking and cycling network here – and indeed throughout London – not just the road network – will be required in order to minimise adverse effects of construction works associated with development. Active travel modes are highly sensitive to route

disruption e.g. resulting in increased distance and road danger, and therefore it is especially important that they are consistently given the highest priority during construction works. **We welcome the further statement** on page 237 that **“High-quality walking and cycling facilities, and limits on car parking are essential to encourage mode shift away from cars.”** London Living Streets looks forward to working with TfL to consider a complementary package of transport investment during the development of this Opportunity Area (p. 237).

We welcome TfL's proposed approach for an improved environment for walking, cycling and public transport and 'strategic hubs' as a key element of better coordinated land use and transport planning **in south London** (p. 240-244 and Figure 50).

We welcome the approach to land use planning set out in **Proposal 94** and Figure 51 (see p. 244-247) and look forward to reviewing the forthcoming London Plan. Our main concern here, which will be set out in more detail in our response to Chapter 6, is the monitoring and delivery of the (welcome) principles set out under this proposal. For example, we are not sure how ambitious targets for mode shares for walking, cycling and public transport (see p. 244) will be assessed and monitored, and how Opportunity Area Planning Frameworks and their delivery will be adjusted if active travel mode shares are not achieved.

Consultation questions on Chapter 5 - New homes and jobs

Q18

We agree that the Policy and Proposals outlined would achieve this.

Q19

We think that some of these proposals are likely to be effective in 'ensuring that transport is used to support and direct good growth'. **However we oppose Proposals 88 (Silvertown tunnel) and 90 (further road crossings in east London)**, both of which are inconsistent with the transport principles of good growth set out on p. 193.

Chapter 6: Delivering the Vision

We agree with the supporting statement in paragraph 1 on page 255 that a more populous and better London fundamentally means “reducing Londoners' dependency on cars in favour of walking, cycling and public transport use”. **Many of London Living Streets' members expressed anxieties focus on perceived and potential barriers to delivery of the Mayor's Transport Strategy, particularly at borough level.** These barriers will need to be addressed if the ambitious programme set out in the Mayor's Transport Strategy is to be achieved.

London Living Streets is happy to work with the Mayor and TfL to help the overall programme set out in the Mayor's Transport Strategy to be successfully implemented. We have in our earlier responses outlined or cited some specific proposals that we have developed, in support of the MTS's aims, and highlight (and attach the two most recent) relevant documents which demonstrate our constructive engagement with the Mayor and TfL in key walking- and pedestrian-relevant areas, as follows:

- *Liveable London – Time for a Transport Revolution* London Living Streets

Manifesto for Walking in London (January 2017)

- *Delivering Vision Zero in London: Proposals from 20s Plenty for Us, Living Streets and London Living Streets (February 2017)*
- *Central London Walking Network - Outline of Ideas (July 2017)*

a) Changing technology

We support Policy 21.

We note that smart phones are not (and are likely never to become) universal. **We think that there is therefore an ongoing need for further roll-out of bus Countdown to enable people to easily access real-time bus information while on the move (Proposal 97).** We note that the London Assembly concurs with this view.

We welcome the recognition on page 256 that whether a car is privately owned or shared makes no difference to the amount of street space that it occupies, and also of the risk that new technology (if not carefully managed) has of reversing mode shift. **We also note that the method of propulsion of a car - whether diesel, petrol or electric (or hybrid) - similarly does not affect the space it takes up on a street or the danger it presents to pedestrians and cyclists.**

We acknowledge that it is impossible to predict new technologies to 2041 and we agree with the proposed approach to respond to technological developments based on the principles set out in **Policy 21**. Whilst we understand the logic behind the reference to 'not reducing walking and cycling to and from stops and stations' we suggest that this be amended slightly to '... while not substantially reducing...'. This is because in our experience, people are sometimes discouraged from walking or cycling in combination with using public transport by locating stops inconveniently for interchanging between stops and stations. **People need to feel that they are being actively supported in choosing to travel by combining active travel with public transport, rather than (where they have a choice), driving.** The good choice for London needs to be made the easy choice for an individual.

We strongly support the statements concerning shared car and other low-occupancy services set out in MTS page 259, and the associated **Proposal 98**. Road user pricing is clearly key here. We highlight the recent emergence of 'pedal me' services, using app-based technology, which offer a sustainable 'on demand' transport service for small groups of individuals and/or some cargo loads. We think that this kind of service will become increasingly common as part of London's transport mix especially if London's cycling infrastructure is upgraded, and should be supported. **We wish the Mayor and TfL to go beyond the rather narrow (car-based) approach set out in Proposal 98 and to ensure that demand management measures evolve to incorporate people-based, health promoting uses of kerb space such as parklets, street trees, places to rest, cycle hangars etc.** In other words, **we would like to see acknowledgement here that there is wider competition for kerb space;** that kerb space is currently dominated by motor vehicles and that demand management is a useful tool to enable creative, social, healthy and sustainable uses of kerb space. We refer to the good work on this at a borough level with the Southwark Council Kerbside Policy and Lambeth's Equality Streets as

examples.

We support the proposed approach outlined in **Proposal 99** (p. 260), as a possible way to help reduce car dependence, especially in Outer London. As mentioned above, we suggest that TfL may further wish to explore and trial the potential of 'pedal me' type demand-responsive services as a possible complement to traditional public transport services, as a way to help reduce car use further.

With respect to connected and autonomous vehicles (p. 261-) **we endorse the guiding principles outlined**, in order to ensure that new technologies do not undermine the Healthy Streets Approach and therefore on this basis broadly support **Proposals 100 and 101**. **However we have a number of concerns about the 'direction of travel' of connected and autonomous vehicles to date beyond those recognised in the MTS:**

- A recent trial in London (Thames Path in LB Greenwich) of autonomous vehicles has removed (rare) off-road shared space from pedestrians and cyclists, and reallocated it to AVs, by annexing the cycle track for AV use and requiring cyclists and pedestrians to share the remaining space. This has reduced amenity for people walking and cycling where implemented. We await the outcome of research on the effects of this trial on active travellers' perception of safety and comfort.
- There is a danger (see last paragraph, p. 261: "... This technology could also improve how efficiently road space is used, such as through route choice that avoids congested areas...") that connected and autonomous vehicles could increase through traffic in residential areas.

We agree with comments in MTS on page 262 that emphasise other potential risks and **welcome the acknowledgement that walking, cycling or public transport will remain more space-efficient than connected and autonomous vehicles**. We note the further comments on page 262 about the nature of interactions between connected and autonomous vehicles and pedestrians, cyclists and conventional vehicles. Our concern is that the way in which these vehicles are allowed to operate in the public realm in London could potentially have a chilling effect on walking and cycling. We are concerned that there is no 100% guaranteed way in which connected and/or autonomous vehicles can be made secure from 'cyber-attack'.

b) Delivery, funding and powers

We support the recognition on page 265 of the need for road user charging (Policy 22 refers) in order to more fairly fund and deliver London's transport system. **We welcome the honest acknowledgement that "... motorists [are] paying too little, and in effect... subsidised by public transport fare payers."** In line with this, **we propose that the Mayor introduces and encourages London's boroughs to introduce a workplace parking levy**, with the funds raised in this way going largely to benefit the public realm, as a ring-fenced source of revenue for ongoing streetscape and public realm improvements.

With respect to funding the Mayor's Transport Strategy (p. 266), **we note with some concern the reference to 'advertising' as an example of a non-fare source of income**. **We believe that on-road advertising (electronic billboards) installed on TLRN in recent years represents a potential danger to pedestrians and cyclists**, given that its primary aim is to distract drivers. It further degrades the public realm, making it less attractive from an active travel perspective. We do not

think that such advertising is an ethical or acceptable source of TfL revenue and we think that it is incompatible with the Healthy Streets Approach which underpins the MTS.

We note the comment on page 267 that Healthy Streets schemes, by which we assume that what is meant are active travel or public realm schemes, although less expensive in capital terms, do not typically provide major revenue to TfL. (They do however generate benefits to local economies). We would add that nor do such schemes generate high maintenance costs to highway authorities, unlike motor traffic-oriented infrastructure such as the recent repair and refurbishment of the Albert Bridge (£7.2M) and of the Hammersmith flyover (£70M+), to give just two examples.

We acknowledge the need for the Mayor and TfL to fund the delivery of the MTS and support the approach outlined in **Proposal 102**, other than via on-street advertising that compromises active travellers safety or amenity.

We re-emphasise the urgent case for introducing road user charging in order to pay for London's roads more fairly.

Implementation plan, p. 270-

We note the generally low cost of measures set out in the Gantt chart (Figure 55) section on 'Healthy Streets and healthy people'. **We also note that some of the higher cost ('M', medium £100-£1bn) measures set out here are a direct result of motor traffic - in effect, another external cost of motor vehicle traffic - rather than inherent costs of better and safer streets and public realm.** For example:

Bus: Retrofit and procure cleaner buses
 Freight: Encourage more freight consolidation
 Streets: Deliver a London-wide cycle network
 Environment: Introduce ULEZ in central London

We recognise that some of the measures set out in Figure 55 will have co-benefits - for instance, successful delivery of Vision Zero will also reduce congestion, a high proportion of which directly results from road traffic crashes.

We welcome the commitment indicated in Figure 55 **to increase the number of street trees** through all three time periods of the MTS implementation plan, and suggest specification of species and of planting position, such as more on-carriageway planting, and using species which take account of climate change.

As noted earlier, **we think that LIP guidance (see page 275-283) will have a crucial role in enabling the delivery of the aims set out in this draft MTS (Policy 23 refers).** We support the three priorities that are required to be addressed by the London boroughs in their LIPs, particularly welcoming the reference to motor traffic reduction strategies (p. 275).

We support Policy 24 and would emphasise the need for much improved monitoring of LIPs than hitherto. A number of concerns (and associated suggestions for the current MTS) about boroughs' use of LIP funding to date have been expressed in discussion within London Living Streets and these are outlined below:

- **Concern expressed where boroughs have in the past frustrated the Mayor's**

public realm objectives. An example was highlighted of where TfL had provided LIP funding for pavement widening, but the borough had then sanctioned taxi ranks on the pavement. **London Living Streets' view is that the Mayor and TfL should not provide LIP funding for borough schemes that do not prioritise pedestrians.**

- Much of the success of the MTS is dependent on the boroughs. There is, therefore, the expectation that the boroughs will 'rise to the challenges' and focus on the mechanisms required for successful delivery. It is time to think 'health' rather than just 'transport', and to think long-term rather than short-term. **An issue with the LIP funding is that it engenders short-term thinking on a year-by-year, piecemeal approach.** Where is the longer-term vision from the boroughs; where is the aspiration?

- **In the past, boroughs have often justified inaction by hiding behind TfL's preoccupation with journey time reliability considerations (focused on private motorised modes).** The result has been a worsening pedestrian experience (delays in crossing roads, pavement width compromised etc.). Under this new MTS, will boroughs continue to be able to do this? **The final MTS needs to clarify this fundamental point.**

- **With respect to consultation processes by boroughs, some boroughs consult very narrowly, and therefore often get a negative result from those respondents in the immediate vicinity of a proposed scheme.** This approach ignores the wider public interest and neglects possible support for public realm and active travel schemes from the wider community. **We therefore suggest that TfL ought to provide clear guidance to boroughs regarding how to conduct transport scheme consultations in order to reduce one potential obstacle in realising the MTS goals.**

Proposal 103 will therefore need to incorporate robust procedures for monitoring of LIP delivery and outcomes by boroughs, to ensure that boroughs are using these public monies for the stated purposes in an effective and efficient way.

We welcome the headline aimed-for outcomes shown in Figure 56, of **80% of journeys by walking, cycling and public transport by 2041 and the 'other expected outcomes' set out in Figure 58.** However **we note the omission in Figure 58, p. 279 ('London's transport will be on track to be zero emission by 2050')** of any reference to road wear. **Road wear seems likely to become an increasingly significant contributor to air pollution in London,** with the trend (supported in the MTS) from ICE to electric vehicles. We further note that the **proposals set out in Chapter 3 to encourage motorcycles into bus lanes is inconsistent with the desired Healthy Streets outcome stated here that 'Streets will be greener and not too noisy'.**

With respect to Figure 58 on page 280-281, we reiterate our comments that, in order to maximise the benefit of improved bus journeys and optimise the links between public transport and new developments and transport investment, that excellent walking and cycling links and interchanges will be required to support such outcomes.

Policy 24 and Proposal 103. As indicated previously, we think that these will be **key elements** of the MTS. Given the fact that most streets in London are borough responsibilities, **Policy 24** will clearly be vital, and **we strongly support it; successful delivery of the MTS will require ongoing monitoring, appraisal**

and delivery, as set out in Figure 59. We agree that support and guidance from TfL to boroughs will be helpful, and essential, in many cases (**Proposal 103**).

A question that arises in relation to the implementation of the MTS is the status of the many street-related projects across London that have been developed before the change in thinking embodied in the Healthy Streets Approach and that are currently in development. For example: Five Ways, Croydon; Wandsworth town centre proposals; the latest City of Westminster scheme for Berkeley Square, and the Quietways programme as a whole. There is a risk that proposals which reflect the status quo, rather than the new direction of the MTS, could significantly undermine the delivery of the MTS and also risk reputational damage to the Healthy Streets Approach and the Mayor's stated objectives. **We therefore propose that schemes 'in the pipeline' are reviewed for compliance with expected transport mode share and health-related outcomes using the Healthy Streets check.**

Q21

We agree with the overall approach proposed here, with some suggestions for strengthening this and some caveats.

Q22

We broadly agree with the overall approach with the exception that it is unacceptable to us to seek to fund London's transport system by advertising which increases road danger and reduces the quality of the public realm, as suggested in Proposal 102.

Q23

We agree with the overall approach – and, given past experience, think that there needs to be more focus on assessing the quality of schemes and on monitoring of delivery.

Q. 24. **Additional comments from London Living Streets**

Achieving the proposed 33% reduction in the number of daily trips by cars, taxis and PHVs

Currently in London, our experience is that people often change their mode of travel as a result of frustration arising from dissatisfaction with the current mode, such as, for drivers, time spent in traffic jams. **A road pricing scheme in our view is essential in achieving the proposed 33% reduction in number of daily trips by cars, taxis and PHVs.** The effect would be to reduce pressure on highway space, at least in the short to medium term. However, as with the congestion charge, there is a danger that the freed-up road space will once again be taken up with motor traffic. In order to prevent this, **we think it is essential that freed-up road space is 'locked in' to more space-efficient, healthy modes. We therefore suggest a number of measures** complementary to road user charging that could be employed to reduce motor traffic capacity, such as: **bus lanes operating 24/7, an ambitious programme of substituting parklets for on-street car parking, tree planting (including in carriageway), filtered permeability of minor roads, protected cycle lanes.**

Changing London's roads culture (see MTS page 47)

We offer some comments and suggestions around changing the culture of how Londoners move around our streets.

1. **Does TfL need a different strapline?** 'Every journey matters' was developed at a time when TfL's policy was to smooth motor traffic flow. We wonder whether this strapline remains appropriate and whether a new strapline is needed to support the new Mayor's Transport Strategy and particularly to reflect the implications of the Healthy Streets Approach and the aim to create a healthier and happier London through people's travel choices.
2. **TfL's definition of 'journey'.** We wonder if a definition of 'journey' is needed to better encompass a 10 minute stroll e.g. to shops, as well as perhaps a new measure to incorporate time spent being (rather than necessarily moving much) in the public realm and experiencing healthy streets.
3. **Messages on movable electronic signs aimed at road users during streetworks and other disruption.** Typically, such signs warn drivers of delays ahead on particular routes and give advice such as allowing more time, or using a different route. **We suggest that all such signs also prompt drivers to consider using another mode**, and directing them to TfL's journey planner and perhaps even giving examples of relevant journey times by other modes.
4. **'Cul de sac' signs do not convey any information about permeability of streets by active travel modes.** Indeed they are designed simply to inform motorists about route choices, and are therefore inconsistent with a 'Healthy Streets Approach to London's street network. **Could TfL investigate how streets and other links which do not allow through-motor traffic but which do allow active travel modes are signposted in other countries and how best practice could be adopted in London?**

Adjusting maintenance spend on highways

We propose that maintenance funding be shifted to a significant degree from carriageways to footways, in order to reflect the Mayor's Transport Strategy's priorities. We think that this would do much to improve the quality of the walking experience across London. Presumably this could be done as part of the LIP funding process to boroughs, which would mean that the LIP funding model would need to be suitably adjusted to allow for this change in priorities.

London Assembly Health Committee recommendations for TfL

We note this Committee's conclusions in November 2016 (<https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/tfls-role-promoting-health-london>) and **we wish to bring to your attention its recommendations, which we support:**

“Key recommendations

- TfL should go further and faster in its ambitions to promote healthier transport.
- TfL should increase the resources available to deliver its health commitments.
- The Cycling and Walking Commissioner should champion public health across London.
- TfL should prioritise investment decisions which reduce health inequalities.

- TfL needs to communicate the health benefits and risks of its programmes to its customers more clearly.
- In time, TfL should look beyond healthy streets, to include other spaces, such as stations.”

- **The draft MTS does not raise the question of 'who' residential streets are primarily for.** It is however essential that this be explicitly addressed and that wider uses for childrens' play and along the lines of Dutch Woonerf or HomeZones.

Susie Morrow on behalf of London Living Streets

2nd October 2017

Attachments:

- *Delivering Vision Zero in London: Proposals from 20s Plenty for Us, Living Streets and London Living Streets* (February 2017)
- *Central London Walking Network - Outline of Ideas* (July 2017)