

# Response ID ANON-SXQU-PPZX-3

Submitted to **Richmond Local Implementation Plan Consultation**

Submitted on **2019-01-11 15:41:05**

## Introduction

## Your Details

### 1 In what capacity are you responding to this consultation?

I am a member of a local group or organisation (please specify below)

#### Other:

London Living Streets ( <https://londonlivingstreets.com/> )

### 2 What is your postcode?

#### Postcode:

SE17 3EQ

## Your Views - Objectives

### 3 To what extent do you support or oppose the objectives of the LIP?

Fully support

### 4 Please tell us the aspects of the Objectives section that you particularly like and why:

#### objectives - like:

We see much to commend in Richmond's LIP Objectives and have chosen to put our comments in this part of the response form, together with caveats and comments on how they might be strengthened.

We note that the headline 'mode shift' target given on p13 is 75% W/C/PT, from a baseline of 61%.

We commend the borough Objectives given on p 13-14, particularly the emphasis on \*encouraging and enabling\* active travel. Simply exhorting people to change their behaviour e.g. via messages such as 'leave your car at home' have proven ineffective at a population level.

We agree that, given the nature of Richmond, the borough's LIP needs a strong focus on improving public transport, especially in the west of the borough, in order to compete with driving. Measures to enhance 'active travel' access to public transport nodes (bus stops, stations) to enable easy and seamless door-to-door travel are therefore vital if LBRuT is to achieve its headline modeshift target. This underlines the importance also of maintenance of footways and cycling infrastructure, along with excellent provision of crossings and design of signalised crossings (e.g. with respect to width, wait time, time to cross) to prioritise walking and cycling. We note and welcome the reviews of signals referred to on p 19 as one of the measures to improve facilities for pedestrians.

#### Outcome 1: London's streets will be healthy and more Londoners will travel actively

We note that Figure 5 on p 16 shows a 'top potential connection' strategic cycling route linking Barnes with Putney and beyond to Wandsworth. This illustrates a general point namely that of the need to work with neighbouring boroughs to create networks which will maximise potential for uptake of active and sustainable travel.

We welcome the commitment on p 18 to use the Healthy Streets toolkit to assess new infrastructure schemes, and the adoption of London Cycle Design Standards for cycle route quality for new routes.

With respect to Richmond's cycling strategy, we would also highlight the excellent work in Waltham Forest Mini-Holland, which has nicely integrated on-street cycle storage for residents with greatly improved public realm, producing multiple benefits for residents.

We welcome and strongly endorse the commitment given on p 18 to introduce School Streets as a practical way to improve conditions for walking or cycling to school and to help reduce children's exposure to air pollution. Overall, however, we would also urge the borough also to plan for full-time interventions such as Low Traffic Neighbourhoods (<https://londonlivingstreets.com/low-traffic-liveable-neighbourhoods>) that deliver permanent change in the balance between people and vehicles.

#### Outcome 2: London's streets will be safe and secure

P 20-21 We greatly welcome LBRuT's initiative to introduce a borough-wide 20mph speed limit. This will be a vital tool in the challenging ambition to achieve Vision Zero targets and making the borough's streets more amenable to walking and cycling. We are pleased to see reference to London's Direct Vision Standard as another important element of this.

We feel that missing from the borough's Vision Zero approach is a focus on (what in the TfL Vision Zero Action Plan is referred to as) Safe Vehicles. We think therefore that the policies around Vision Zero should include the following:

a) a recognition of the impact that Low Traffic Neighbourhoods can have on casualties as a way of reducing road danger at source and  
b) in relation to Safe Vehicles, a greater list of actions to increase compliance with (lower) speed limits. As there are elements of new technology and in particular mandatory Intelligent Speed Adaption (ISA) which are starting to offer significant benefits in increasing compliance with lower speed limits, we would suggest that LBRuT incorporates the following into its policies for Safe Vehicles in relation to vehicles operating in the borough in the future (i.e. LBRuT sets a date (e.g. 2022) that, for all new vehicles from that time on in the following categories, mandatory ISA is a requirement):

- Adopting ISA in its own fleet procurement practices as part of its renewal programme;
- Ensuring ISA is a standard requirement for any service procured by the Council with a fleet requirement;
- Encouraging the uptake of ISA in other fleets which operate in the borough, such as hauliers, construction firms and coach operators – potentially this could be

as aspect of granting planning applications;

- Include ISA on any car club vehicles that aim to operate from a base within the borough.

P 21 The objective of minimising the effects of level crossings on people walking and cycling is welcome. A common scenario is for people to have to wait in amongst traffic fumes. As well as the footbridge at White Hart Lane, we wonder if there may be scope for improving conditions for people walking and cycling at level crossings passing through the borough in other ways.

We welcome the inclusion of community intelligence with reference to 'near misses', an often ignored deterrent to cycling and walking. We agree that casualty statistics alone are a poor measure of road danger since they fail to capture people's perception of safety, and actual safety, when using streets in the borough and indeed London-wide.

Outcome 3: Streets will be used more efficiently, and have less traffic

Rising car ownership is rightly recognised in the LIP as a barrier to active travel. Moving traffic creates noise, pollution, severance and danger, while kerbside car parking prevents social, environmental and community-orientated use of kerbsides e.g. for parklets. We welcome the honest acknowledgement in the LIP that car ownership is a particular challenge with respect to the borough's ability to improve people's health and quality of life and more broadly to implement the Mayor's Transport Strategy.

We suggest that, in order to address this, more emphasis on car clubs is needed, and note that the neighbouring borough of Wandsworth has achieved relatively high uptake in car club membership. Similarly, we think that the LIP could place more emphasis on zero/low emission vehicles for personal and also for business use, such as electric-assist cargo bikes. This would have implications for public provision for electric bike charging points.

P 24 We question the rationale for having free parking permits free for the least polluting motor vehicles. These still take up kerbside space and create negative externalities for other citizens in Richmond. We suggest that a review of the council's parking policy, taking into account the opportunity cost of allowing kerbside space to be occupied by cars (which spend most of their time parked), is needed, in order to deliver Outcome 3.

P 24-25 We think that albeit with some good elements the objectives listed here could benefit from strengthening. We agree that filtered permeability is an important tool to use in making more efficient, lower traffic streets. Additionally we would suggest that the borough review parking charges, promote and enable freight and servicing mode shift away from the current model of over-powered, polluting four-wheeled vehicles to walking and cycle freight. We also note the potential for enabling cars to be switched to e-bikes.

Outcome 4: London's streets will be clean and green

We strongly agree with the emphasis on reducing the number of vehicles in order to improve air quality in the borough. We support the introduction of a diesel car parking surcharge.

We note and very much welcome the qualification of the objective to increase electric car-charging points "with a focus on minimising the impact on space on pavements for pedestrians" (p 26).

We think that in reviewing car parking, the council should set a target for an annual percentage decrease in on-street parking of motor vehicles, however powered. Over time, this would act as a steady disincentive to owning a car. The public space thus freed up could be reallocated as mentioned above, to community and environmentally sustainable uses, such as parklets and on-street secure residential bicycle storage.

Outcome 5: The public transport network will meet the needs of a growing London

P 26 We note that public transport trips originating in the borough have remained more or less static since 2011; a worrying statistic that should be read in the context of population growth. The narrative here suggests a history of under-investment and an urgent need for more support for (not just investment in) local public transport. We agree that increasing the hours of operation of bus lanes, would be a useful step in making bus travel more reliable and attractive (p 27), and we note the inclusion of a reference to this under Outcome 7.

We support the objectives given on p 29. Wider use of real-time public transport information would also encourage the use of public transport. For example, display screens with bus Countdown information could be located in public places such as GP practice waiting rooms, cafes near bus stops etc. at low cost.

Outcome 6: Public transport will be safe, affordable and accessible to all

We support these objectives. In order to strengthen them, we suggest a review of all bus stops in the borough, with a view to improving ease of interchange between bus and walking and cycling.

Outcome 7: Journeys by public transport will be pleasant, fast and reliable

We strongly agree with the importance of ensuring easy access to and interchange with stations and we support the other objectives listed on p 31.

Outcome 8: Active, efficient and sustainable travel will be the best option in new developments

We note that potential for growth is relatively limited. We emphasise the need for all new developments to be easily accessible via active travel and/or public transport. Other boroughs have a policy of not issuing resident parking permits as part of the planning requirements for new-builds, and this represents a good way to reduce car dependence and 'build in' healthy behaviour among new residents from the outset. Construction management plans should be used to minimise disruption to existing active travel networks, and risk of harm to the general public e.g. from construction lorries.

Outcome 9: Transport investment will unlock the delivery of new homes and jobs

The long time horizon with respect to the arrival of Crossrail 2 underlies the importance of multiple, disseminated, short and medium term measures to help deliver the MTS in the borough.

## **5 Please tell us the aspects of the Objectives section that you particularly dislike and why:**

### **objectives - dislike:**

Please see comments in section 4, above.

## **Your Views - Delivery Plan**

## **6 To what extent do you support or oppose the delivery plan?**

Tend to support

## **7 Please tell us the aspects of the Delivery Plan section that you particularly like and why:**

### **delivery plan - like:**

We see much to commend in Richmond's LIP Delivery Plan which is presented in p 36-63, and have chosen to put our comments in this part of the response form, together with caveats and comments on how they might be strengthened.

We note and agree with the comment about the strong overlaps and linkages between programmes in the Delivery Plan. This underlines the multiple benefits of successfully implementing the MTS in Richmond.

We understand that funding constraints necessitate prioritisation of projects and agree that the emphasis should be on high quality schemes. We note that filtered permeability is a low-cost intervention which can be achieved at scale and speed e.g. creating mode filters via use of bollards and planters to create Low Traffic Neighbourhoods. Please see our briefings jointly produced with the London Cycling Campaign, at <https://londonlivingstreets.com/low-traffic-liveable-neighbourhoods/>

We strongly support the introduction of a borough-wide 20mph speed limit and welcome the recognition of wider benefits that this could have. We suggest (p 37) that enforcement could be strengthened by the adoption of policies to address the 'safe vehicles' element of Vision Zero. What opportunities is the borough taking to encourage take-up of Intelligent Speed Adaptation (ISA) among its own vehicles, the contractor fleets that the borough works with, and car club vehicles? Planning to include these in future contracts for new vehicles can start to encourage compliance both among these vehicles and those that will be travelling behind them. We also think that there should be greater recognition in the final LIP of the road danger reduction benefits of creating Low Traffic Neighbourhoods referred to above, alongside the other advantages of removing rat-running traffic from residential streets.

While electric vehicle charging points have a role to play in reducing air pollution, they are not a panacea. We draw your attention to London Living Streets policy on EV charging points, i.e. preferred locations are off-street e.g. in car parks, followed by use of pavement build-outs, with installation on (wide) pavements as the option of last resort. For a measured 360 degree consideration of Evs (particularly cars) in urban areas, please see our Vice-Chair's blog post at <https://londonlivingstreets.com/2018/10/19/are-electric-vehicles-a-threat-to-cities-conference-report/>

With respect to sources of funding (p 41), we think that there is scope for the borough to generate more revenue from parking revenue. We support the roll-out of CPZs to generate income to support active travel and healthy streets projects.

### Long-Term interventions to 2041, p 43

We welcome the focus in Table ST03 on improved facilities for walking and cycling.

We strongly support the proposed area-wide interventions based on East Sheen town centre, including the implementation of a 20mph speed limit on this section of the South Circular.

We welcome measures to improve Richmond town centre using a Healthy Streets approach.

We welcome the LIP's recognition that severance in various forms across the borough is an issue and the acknowledge of unmet demand for active travel across the Thames at Teddington Lock. We would be pleased to support the mooted 'active travel' bridge across the Thames connecting Ham and Twickenham in any way that we can.

### Three-year programme - supporting commentary

We welcome the statement on p 47 that the three-year programme is driven by the introduction of the borough-wide 20mph speed limit and that this will "spearhead a new approach to strategic transport planning in the borough, with more focus on Healthy Streets and reducing vehicle dominance in residential areas."

In relation to public/political aspects of risk assessment (Table ST05, also ST06 for the annual programme), we welcome the outward looking approach to the local community e.g. mitigating risk by "Encourage the public to nominate their local area for improvements, and encourage community-led design".

### Annual programme of schemes and initiatives (p 51 et seq.)

We agree with the evidence-led approach outlined in pages 51-2 to better understand how to support mode shift in higher car use areas of the borough, as a foundation for developing infrastructure schemes.

### Monitoring delivery

In relation to Table ST07, Overarching mode-share aim and outcome indicators, it would be useful to have more interim targets. This table, under Outcome 2, gives a target of 26 KSIs by 2022. We note that there were 77 recorded KSIs in Richmond in 2017, which underlines the challenge in achieving the underlying reduction in road danger.

### Appendix 1: Summary of annual spending submission to TfL

We highlight and very much welcome the proposed introduction of a School Street in Winchester Road to support active travel and reduce air pollution around St Stephen's Primary School in Twickenham.

## **8 Please tell us the aspects of the Delivery Plan section that you particularly dislike and why:**

### **delivery plan - dislike:**

Please see comments in response to section 7, above.

## **Final Comments**

## **9 If you have any final comments you would like to make about the Local Implementation Plan please tell us using the space below:**

**final comments:**

Comments on local context, challenges and opportunities etc. (p 1 -12)

We like the inclusion of a map of street types in the borough at Figure 2, as a good basis for conversations about Richmond's streets and roads network.

P 10 - claims a high quality public realm in town centres - while this is true to an extent, we think all of the borough's town centres would be greatly improved if they were made much less car dominated than at present. As well as improving Healthy Streets ratings, this would have benefits to the local economy ( see <https://tfl.gov.uk/corporate/publications-and-reports/economic-benefits-of-walking-and-cycling>).

P 10 - we note the statements regarding car ownership levels being high and continuing to increase.

P 10 – we are pleased to see that community severance is recognised as an issue, especially for some groups in the population.

The borough's culture of strong civic engagement provides a good base for early (and ongoing) engagement with groups to create better streets for people, with many co-benefits.

We agree with the conclusion that there is massive potential for mode shift to walking and cycling across the borough.

We support the comments made on p12 about [the need for] high quality cycling routes and the centrality of infrastructure in providing residents and visitors with the choice to cycle.

**Overall comments**

Overall, in terms of how the LIP could be strengthened, we think that there needs to be more focus on car restraint, both in terms of policies and practices around ownership and access to streets. Enabling walking, cycling and public transport will require sometimes difficult decisions. However the prize of healthy streets and healthy people is one worth having and will make LBRuT an even better borough in the longer term, as well as helping tackle the long term inequalities between areas of the borough such as the differences in daily activity cited in Figure 6.

We think that the borough's strong tradition of civic engagement will provide a strong base to 'change the conversation' around who, and what, the borough's streets are for.

**10 In relation to this consultation, is there anything we have not considered that may have a negative impact on you or the local community?**

No

**If yes, please tell us by using the space below::**

**About You**

**11 Are you:**

Male

**12 What was your age last birthday?**

55-64

**13 Do you consider yourself to have a disability?**

No

**14 How would you describe your ethnic group?**

White

**other:**

**15 Please indicate your sexual orientation:**

Heterosexual / straight

**Self-describe:**

**16 Do you belong to a religion or faith group?**

Prefer not to say

**Other religion:**