



Greenwich Living Streets are a statutory consultee to the Third Local Implementation Plan 2019 Public Consultation. This is our response to the specific questions asked in the online consultation which we hope you find useful in giving a pedestrian perspective to the local implementation of the London Mayor's Transport Strategy 2018.

Greenwich Living Streets is a newly founded group under the aegis of Living Streets the charity. Living Streets is the main charity for pedestrians, founded in 1929 in response to high pedestrians casualties. Living Streets wants a nation where walking is the natural choice for everyday local journeys. Our mission is to achieve a better walking environment and inspire, encourage and enable people to walk more. This naturally applies to any pedestrian, particularly those with difficulties that affect mobility (such as physical, perception or sensory disability).

Living Streets, in co-operation with 20's Plenty have been instrumental in the introduction of 20mph into many parts of Greater London (and is an ongoing process of introduction elsewhere) but there are only specific 20mph zones in the Royal Borough of Greenwich (RB Greenwich)

Greenwich Living Streets will be working with professionals, politicians and other public realm stakeholders and campaign with our supporters to improve streets and public spaces to create safe, attractive and enjoyable places to walk, meet and relax.

Question 1 Do you think the borough vision, objectives and priorities capture the borough's key transport challenges and opportunities ?

We support the vision, objectives and priorities outlined in the consultation document. However, we do not think that the programme of investment and long term delivery plan properly match the LIP priorities (particularly in relation to the *Healthier* or *Greener* Greenwich transport objectives)

Question 2 Are there any additional challenges and opportunities that should be included?

The key challenges identified and listed in the Plan generally relate to large infrastructure challenges rather than behavioural change that can be brought about through smaller (and cheaper) initiatives.

The following **challenges** also need to be addressed by RB Greenwich

- The levels of airborne pollutants, highway dangers and rat running caused by private motor traffic is particularly high in the borough as a result of its location as an inner London borough and the historical legacy of inter-connected networks of residential streets.
- The increasing use of private motor vehicles for short journeys.
- Highway danger and pollution levels that are limiting the growth of active travel.
- The growth of electric motor vehicles that may produce unacceptable levels of airborne pollutants (especially particulate matter within the borough) and also not address issues of highway safety. This is notwithstanding that these vehicles may produce less toxic pollutants at point of use.
- A large proportion of motor traffic is passing-through (using the A2, A20, A205, A206, A207 and Blackwall Tunnel) rather than beginning or ending its journey within the borough. This presents challenges in dealing with TfL and neighbouring boroughs. A new road tunnel ('Silvertown') to increase road capacity near Blackwall Tunnel will greatly increase pollution levels and road danger in Greenwich. Capacity building schemes simply facilitate increasing traffic levels.
- The provision of additional transport infrastructure to accommodate a fast growing population.

We think that there are easy-win **opportunities** to increase the share of trips made by active travel and public transport in the borough.

- Small increases in the additional numbers of journeys made as pedestrians will have the largest positive impact on the number of journeys made by public transport or active travel and at the lowest cost to the borough. Greenwich Living Streets can assist the borough to create simple schemes that boost the opportunities and experience of pedestrians.
- The borough should, as a matter of urgency, introduce a speed limit of no more than 20mph on all the highways that it controls (in particular those that do not have footways and press TfL to do the same on their network in the borough. We welcome the introduction of 20mph limits on many highways in the borough but recommend a 20mph limit as the default throughout the borough and the use of the TfL *20mph Toolkit* to ensure high levels of compliance with this limit. Currently more than half of the largest 40 urban authorities in the UK have a policy of setting 20mph as the default for all their streets.

If a pedestrian is struck by a vehicle at 20mph they have a 97% chance of survival. Just 10mph faster it drops to 92%. With 20 mph limits the walking experience is more pleasant, less noisy and felt by pedestrians to be safer. These are the conditions that will increase the share of journeys made by pedestrians and help the borough meet the targets that have been set.

- Most improvements to public transport will also boost pedestrian journey numbers.
- Much of the borough is well placed, through location in inner London and the layout of the road and rail network, to create a series of low traffic neighbourhoods that are protected from motorised through-traffic and encourage walking and cycling. The introduction of low traffic neighbourhoods as outlined in the London Living Streets and London Cycling Campaign documents <https://londonlivingstreets.files.wordpress.com/2018/09/lcc021-low-traffic-neighbourhoods-intro-v8.pdf> and <https://londonlivingstreets.files.wordpress.com/2018/09/lcc021-low-traffic-neighbourhoods-detail-v9.pdf> should be adopted.
- Low private motor-vehicle ownership in the borough provides the opportunity to make a popular shift in resources towards public transport, walking and cycling.
- The removal of shared footway schemes and enforcement of existing "cycling on the footway" legislation would encourage many more pedestrian journeys. Footways that are shared with cyclists are frightening for all and dangerous for vulnerable pedestrians (children, those unable

to move quickly and those with vision impairment). The inclusion of such schemes and perceived highway danger has aided and encouraged widespread unchecked illegal use of footways by cyclists in the borough although it is recognised that this has been exacerbated by low levels of enforcement.

Question 3 Do you support the overall detailed three-year indicative programme of investment (2019-2020 to 2020-2022)?

And,

Question 4 Which individual packages of measures within the programme do you support?

Greenwich Living Streets support the shift in expenditure towards active travel but would like to see more expenditure that would result in fewer private motor vehicles and fewer private vehicle journeys made through RB Greenwich.

The London Mayor's aim is that travel by foot, cycle and public transport is increased by 29% (or 0.7% per year) to reach 80% of all journeys by 2041. Nearly 30% of all journeys in Greenwich are currently made on foot (with public transport having similar levels and cycling just 1.7%). We believe that low traffic neighbourhoods are the best way to increase these journeys providing better opportunity and experience for people to walk and cycle. Greenwich is able to fund projects that encourage walking and cycling local journeys and journeys made to public transport and should prioritise its expenditure and expertise where it can have most impact.

- We would like to see the following indicative programme of investment 2019 to 2022 rolled into a single fund together with funds from other related initiatives.

Primary cycling routes	£1,950k
Healthy walking routes	£600k
Modal filters	£300k
	=====
Total	£2,850k

This single fund should mostly be spent on creating low traffic neighbourhoods across the whole borough with emphasis placed on improving main highways by:

- footway widening, gained through carriageway narrowing
- the steadying of traffic flows and increased highway safety through the use of single lane traffic, and various traffic calming methods
- effective planting of trees and shrubs on and around main highways to reduce the effects of noise and toxic air pollution
- effective planting of trees need to extend along streets in residential areas generally and all pedestrian routes to places of interest, such as transport nodes, shopping, leisure, sports, green open spaces and schools. This to begin, with the long term target of all highways (underground services and overall widths permitting).

This single fund could also call on other TfL funded schemes within the programme budgets in relation to reducing highway danger (infrastructure and behavioural), traffic reduction, emissions reduction and the Liveable Neighbourhood bid.

Low traffic neighbourhoods are cheap and effective. They reduce traffic, encourage ordinary cycling and walking by making them safer, reduce anxiety and re-create less polluted neighbourhoods.

Greenwich Living Streets would like to see borough-wide initiatives to encourage walking and cycling rather than the more expensive and less effective specific-site projects. We support the creation of quiet traffic areas through the introduction of modal filters in the draft Greenwich Local Implementation Plan and urge that the London Living Streets and London Cycling Campaign documents

<https://londonlivingstreets.files.wordpress.com/2018/09/lcc021-low-traffic-neighbourhoods-intro-v8.pdf> and <https://londonlivingstreets.files.wordpress.com/2018/09/lcc021-low-traffic-neighbourhoods-detail-v9.pdf> should be adopted.

- We do not support the Liveable Neighbourhoods bid for Greenwich town centre in its current form and urge the council to look elsewhere in the borough where improvements to the streets environment would benefit more residents.
- We do not support all of the Traffic Reduction Package as neither the introduction of more CPZs or car clubs will have a significant on reducing traffic in the borough. The Traffic Reduction Package (£458k) includes measures that may facilitate a change of ownership models for private motor vehicles but not result in any reduction in traffic. Evidence shows that car clubs increase the number of car journeys made by those who currently do not own a car and have only a small positive impact on those that already have access to a private vehicle. We support the introduction of modal filters.
- We do not support the Reducing Emissions Package. Electric Vehicle Charging Points (EVCPs) on the footway is opposed unless it is ensured that:
 - trip hazards for pedestrians are not introduced (primarily EVCP cabling delivering power to vehicles). Pedestrians will also need to cross carriageways at appropriate intervals and in accordance with desire lines without hindrance by EVCP facilities.
 - the footway is only used where more than a minimum of 2.0 metres* is left for pedestrians (*as guided by Inclusive Mobility 2005 which also notes increased requirements for high demand locations and every case will need appropriate evaluation). Additionally, where the footway is already less than 2.0 metres, this should not be introduced on the adjacent carriageway either.
 - Associated infrastructure (e.g. distribution hubs/transformers) do not impact on footways or pedestrian safety.

We are concerned that electric vehicles (EVs) do little to reduce the toxic air caused by motor traffic and nothing to improve highway safety for pedestrians. Pollution levels caused by vehicle exhausts may be reduced but only local NOx levels will be positively affected. Overall NOx levels may not change with a shift to electric vehicles and harmful particulate matter levels may increase due to tyre, brake and carriageway wear and the re-suspension of road dust caused by heavier electric vehicles on local highways. It should also not be forgotten that EVs shift a certain level of pollution out of cities, but does not disappear – there is still an environmental cost as it there an impact due to battery recycling (even with today's level of technology).

Question 5 Do you support the other schemes listed in the longer term delivery plan?

Greenwich Living Streets wishes to see the logical expansion of ULEZ throughout Greater London/M25 and therefore throughout RB Greenwich entirely (including TfL routes). It does not make sense to have Low Emission targets in restricted areas of the borough only. [However, it makes no sense to enable entry of polluting vehicles owned by those who can afford it, charge it

against business expenses and tax or temporary visitors from who tolls will not be collected. Although not in the remit of RB Greenwich, note that ULEZ requires further tightening].

We support improvements to public transport so that residents are able to walk or cycle to bus stops and rail stations. We oppose the schemes that have the consequence of increasing motor highway traffic or air/noise pollution on our streets.

We are concerned that there is a plan to “investigate autonomous vehicles” as part of an apparent “longer term delivery plan” when permissions *already* appear to have been (&/or in the process of being granted) as reported in the local press (<https://www.newshopper.co.uk/news/17243726.greenwich-first-in-the-country-to-trial-self-driving-cars/>). We have yet to see evidence of safety, whether by cost reduction they will encourage some users to use these instead of public transport and other suggested benefits appear to be currently speculative.

Overall, the schemes outlined in question 5 are not detailed and require environmental impact assessments and may need to be challenged on a cost effectiveness basis. Schemes should primarily be judged against the first two objectives in the Third Local Implementation Plan of a healthier and greener Greenwich.

Question 6 Do you have any further comments about the LIP?

We welcome the recent improvements and provision of new cycling infrastructure. Greenwich Living Streets would like to see at least as great a focus placed on pedestrian welfare. The idea is not to dissuade motorists by negative enforcement but to make public transport use and walking sufficiently attractive to make driving the least attractive option for the majority of those making journeys. Above all, those with the greater mobility difficulties, whether caused by infirmity or other impairments such as that affecting cognition or sight can walk and use public transport entirely with appropriate safety and comfort.

Targets given in the plan a set a long way off (2041), have only a single milestone at 2021 or only provide vague wishes. We would like to see far more detail and accountability throughout the Plan.

Many existing and planned schemes have failed to take into account vulnerable pedestrians, particularly those who are young or who are unable to get around easily. Greenwich Living Streets would like to work alongside members and officers at RB Greenwich to ensure that schemes meet the needs of all local pedestrians. We would like to help in the formulation of schemes to ensure that all pedestrian issues are fully addressed.