



## **Lewisham Living Streets response to the public consultation on Lewisham's Draft Local Implementation Plan November 2018**

Lewisham Living Streets is a statutory consultee appearing in Appendix A – Statutory consultees document for the Transport Strategy and Local Implementation Plan 2019 – 2041 October 2018 Draft

Lewisham Living Streets is a local group under the aegis of Living Streets the charity. Living Streets is the main charity for pedestrians, founded in 1929 in response to high pedestrian 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).

Lewisham Living Streets works 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.

### **3. Do you think we have captured the borough's key transport challenges and opportunities?**

Lewisham Living Streets do think that the borough's key transport challenges and opportunities have been captured.

### **4. Are there any additional challenges and opportunities that should be included?**

#### Challenges

- The levels of airborne pollutants, road dangers and rat running caused by private motor traffic is particularly high in Lewisham as a result of its location as an inner London borough and the historical legacy of inter-connected networks of residential streets.
- Increasing use of private motor vehicles for short journeys.
- The growth of electric motor vehicles that will continue to produce unacceptable levels of airborne pollutants (especially particulate matter within the borough) and not address issues of road safety.
- The expected increasing numbers of electric motor vehicles will need to be charged by owners but current technology and the lack of private off-street parking is putting pressure on the Council to provide kerbside charging points. This will produce conflicts both between vehicle owners/users wishing to use the finite resource of charging points and a conflict

between the amenity and safety of pedestrians with the convenience and utility of owners/users of electric motor vehicles.

- Electric Vehicle Charging Point obstruction and trip hazards to pedestrians, particularly to those with limited mobility &/or vision are likely to become significant unless provision is carefully planned.

### Opportunities

- 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.
- Low private motor-vehicle ownership in the Borough provides the opportunity to make a popular shift in resources towards public transport, walking and cycling.

### Comments on the challenges and opportunities section:

- The power of Lewisham to act in relation to public transport infrastructure and the Transport for London road network (LTRN) is limited. The focus of Lewisham council's activities should be on what it can do on its own road network.
- Lewisham Living Streets together with 20's Plenty was instrumental in the introduction of the 20mph speed limit to the borough but work needs to be taken in terms of calming measures and education as well as liaison with the police to enable active legal enforcement.
- Lewisham also has a number of good policies regarding footway parking but we have found that clear footways are often inadequate or insufficient for the location where guidelines have been ignored. The recent case, *Ali v LB Newham* underlined the necessity for local authorities to follow national guidelines. Lewisham Living Streets would like LB Lewisham to use its own Parking Policy document and take the opportunity to end pavement parking where the remaining footway is less than a clear 1.8 metres wide as a start\*, enforce compliance by fining vehicles parked outside marked areas and move towards the total elimination of pavement parking in the Borough. (\*noting that guidance given in *The Manual for Streets* (DfT2007) and *Inclusive Mobility* (DfT2005) is greater than this and *Healthy Streets Check* (TfL2017) and *iWalk* (Bristol University & Borough) together suggest the need for wider minimum clear footways.)
- 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.
- The funding of low traffic neighbourhoods should be focussed on the amelioration of the main roads that will take some additional traffic through;
  - footway widening,
  - the steadying of traffic flows and increased road safety through the use of single lane traffic,
  - effective planting of trees and shrubs on and around main roads to reduce the effects of noise and toxic air pollution
- Electric vehicle charging at the roadside is opposed by Lewisham Living Streets unless it is ensured that:
  - obstructions and trip hazards for pedestrians are not introduced
  - the footway is only used where more than minimum clear footway (as discussed above) is left available for pedestrians (this includes associated apparatus such as transformer/distribution hubs or high voltage transformers)

- Footways or footpaths that are shared with cyclists are frightening for vulnerable pedestrians (children, those unable to move quickly and those with vision impairment) and should be removed in the Borough. The inclusion of such schemes and perceived road danger has led to widespread use of footways or footpaths by cyclists in the Borough.

## 5. How important do you consider each of these objectives to be?

1. Travel by sustainable modes will be the most pleasant, reliable and attractive option for those travelling to, from and within Lewisham
2. Lewisham's streets will be safe, secure and accessible to all
3. Lewisham's streets will be healthy, clean and green with less motor traffic
4. Lewisham's transport network will support new development whilst providing for existing demand

Lewisham Living Streets support the first three objectives

## 6. Do you support the overall detailed three-year indicative programme of investment (2019/20 to 2021/22)?

**AND**

## 7. Do you support the individual projects within the programme?

Lewisham 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 the Borough.

Lewisham Living Streets believes that decreasing private vehicle journeys must be directly balanced with improving public transport (safety, frequency, accessibility, distribution and cost). Attempting to reduce traffic flow by increasing costs can be counterproductive as many motorists can charge this against tax whilst increasing a sense of entitlement and excluding the less well off. Public transport needs to be sufficiently attractive that it is hard to refuse – noting that LB Lewisham has limited influence here.

Lewisham Living Streets supports the concept of a fully integrated transport system both within and connected to London but recognises that this is a long-term ambition.

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 2040. Nearly a third of all journeys in Lewisham are currently made on foot (with public transport being a little more than a third and cycling just 1.5%). Lewisham Living Streets believe that low traffic neighbourhoods are the best way to increase these journeys providing better opportunity and experience for people to walk and cycle. LB Lewisham 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.

Lewisham Living Streets would like to see the following TfL borough funding 2019 to 2022 rolled into a single fund.

Healthy Neighbourhoods	£2,044k
Local Pedestrian Improvements	£300k
Local Cycling Improvements	£750k
Road Danger Reduction	£380k
Air Quality and Noise	£280k

Safer and Active Travel	£981k
	=====
Total	£4,735k

Whilst the direct expenditure on cycling improvements is welcome, direct pedestrian improvement is significantly disproportionately low and needs considerable increase.

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

- footway widening by removing carriageway space
- the steadying of traffic flows and increased road safety through the use of single lane traffic, and visual countermeasures
- effective planting of trees and shrubs on and around main roads to reduce the effects of noise and toxic air pollution

Lewisham 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 “Healthy Neighbourhoods” in the draft London Borough (LB) of Lewisham 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.

## **8. Would you like to see a Healthy Neighbourhoods Programme implemented in your area?**

Lewisham Living Streets would like to see the Healthy Neighbourhoods Programme implemented as quickly as possible across the whole Borough 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.

## **9. Do you support the goals of the Vision for Rail?**

Lewisham Living Streets support the goals outlined but would like to see more emphasis on the removal of obstacles for people to use public transport. Many other Londoners enjoy the opportunity to “turn up and go” at railway stations managed by Transport for London. Travel from our rail stations in Lewisham is often restricted by lack of level access to and between platforms and also the requirement to “book in advance” wheelchair facilities for entering the trains themselves.

## **10. To what extent do you support the following schemes outlined in the vision?**

The “metroisation” of rail services will inevitably lead to the need for passengers to change trains during their journeys more often than they do now. Notwithstanding the issues of fair access for passengers who take longer to change train services, the overall impact is likely to reduce the attractiveness of rail travel, particularly for mobility impaired passengers.

## **11. Do you think there are any objectives or schemes missing from Lewisham's Vision for Rail?**

No comment.

## **12. Do you support the other schemes listed in the longer term Delivery Plan (p80 - 82)**

- • More low emission bus corridors
- • LEZ - tightening of standards
- • The Lewisham Spine – A21 Healthy Streets Corridor
- • A2 New Cross Road / Amersham Gyratory removal
- • Bakerloo Line Extension
- • Lewisham Station & Interchange
- • New Cross to Lewisham Overground Extension
- • Ringway Corridor (Southend Lane and Whitefoot Lane) Improvements
- • Lewisham Town Centre
- • Catford Regeneration Masterplan
- • New Bermondsey Station
- • Brockley Station Interchange
- • Metroisation
- • New or improved bus services in the south of the borough

Many of the schemes listed do not impact on pedestrian issues. Lewisham Living Streets would like to see emphasis within all the schemes on the delivery of cleaner air, better opportunity and experience for walking and meeting in streets and equity in access to the streets and public transport.

Whilst Lewisham Living Streets supports any public transport improvements, necessary for the formula of 'less drivers because of better transport' – it remains to be seen which scheme becomes a realistic in the mid future and awaits details before commenting is possible.

## **13. Do you consider the targets to be sufficiently ambitious yet realistic?**

Lewisham Living Streets would like to see more target years filling the gap between 2021 and 2041 in relation to targets for walking. Whilst long term planning is sensible, some targets are not acceptable if included such as 100% disabled access for all public transport.

Reducing vehicle traffic is a vital component of the London Mayor's Transport Strategy but the schemes in the LB Lewisham three-year plan may sadly not have the impact on vehicle traffic of a reduction from 766 to 747 million kilometres. The longer term target of a reduction to 635 million kilometres is based on the introduction of improved public transport over which the Council has little control and weak influence. With much vehicle traffic in Lewisham simply passing through the Borough these targets tend to seem beyond the Council's remit.

These concerns are repeated for targets on vehicle ownership. These targets may be distorted by changes in use models for private vehicles through taxi/car club schemes that simply shift ownership rather than reduce vehicle numbers or use.

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 road wear and the re-suspension of road dust caused by heavier electric vehicles on local roads.

#### **14. Do you have any other comments about the LIP?**

Many existing earlier and planned schemes have failed to take into account vulnerable pedestrians, particularly those who are young or who are mobility impaired for a wide variety of reasons (whether permanent or temporary). Lewisham Living Streets would like to work alongside members and officers at LB Lewisham to ensure that schemes adequately meet the needs of all local pedestrians, not just to minimum standards but to the fullest measure that can be reasonably attained. We would like a key place in the formulation of schemes to ensure that all pedestrian issues are fully addressed. Local stakeholders and the consulted public should be considered as valuable resources also in the earliest planning stages.

Current focus on KSI data omits a substantial part of the experiences and anticipations of pedestrians, particularly those with factors that affect their mobility or confidence in accessing the public realm. Whilst KSI data is important, it is also important to be aware of the impact of 'lesser' injuries that are not classified as 'serious' but nevertheless may take significant time for recovery which can also be long term. Such injuries are less liable to be reported, or otherwise appear in statistics, particularly if the person responsible for the collision is unknown. Importantly this undermines efforts to make walking attractive, safe and secure and widens the impression that the streets are generally unsafe for those with the most vulnerabilities.

Lewisham Living Streets believes that steps should be taken to decrease the levels of parents (or carers) driving children to schools (which normally use catchment criteria that demands locality). This might be helped with timed barriers and parking prohibition. This should be in conjunction with general enforcement of existing regulations against engine idling (a problem also characterised by parents waiting to pick up children in the afternoon). Idling produces high levels of pollutants, is illegal and a problem in the borough that needs addressing in terms of education followed by enforcement.