

Living Streets is the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk.

Living Streets response to Consultation on Integrated Transport Block Funding

Introduction

We are the national charity that stands up for pedestrians. With our supporters we work to create safe, attractive and enjoyable streets, where people want to walk. We work with communities, professionals and politicians to make sure every community can enjoy vibrant streets and public spaces.

We started life in 1929 as the Pedestrians Association and have been the national voice for pedestrians throughout our history. In the early years, our campaigning led to the introduction of the driving test, pedestrian crossings and 30 mph speed limits. Since then our ambition has grown. Today we influence decision makers nationally and locally, run successful projects to encourage people to walk and provide specialist consultancy services to help reduce congestion and carbon emissions, improve public health, and make sure every community can enjoy the benefits of walking.

Response to the consultation questions:

Question 1 - Do you have any objections to the principle of updating the formula to reflect current transport priorities?

We agree with the principles of updating the formula to reflect the Department's current transport priorities such as its active travel ambition and the soon to be published door to door strategy.

Question 2 - Do you think IT Block funding should continue to be based solely on need?

We support the concept of adapting the IT Block funding to incorporate an element of improvement through the inclusion of trend data in the formula.

Question 3 - Do you have any comments on the proposed new formula to eliminate perverse incentives?

We are concerned that the inclusion of trend data through average journey times in option one could act as a disincentive to local authorities adopting 20mph limits as recommend in the Department's recently published Speed Limit Guidance¹. We are also concerned that infrastructure for pedestrians such as road crossings could be reduced and restricted as local authorities are driven to smoothing traffic flow to reduce vehicle journey times at the expense of pedestrian journey times and comfort.

Question 4 - Do you have any suggestions for trend data for any of the elements of the current formula?

No

¹ Setting local speed limits: Department for Transport circular 01/2013 - <https://www.gov.uk/government/publications/setting-local-speed-limits>

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Question 5 - Do you have any views on the proposed balance (75%:25%) between 'need' and 'improvement'?

No

Question 6 - Do you have any further comments on Option 1?

No

Question 7 - Should carbon be part of the IT Block formula?

Yes

Question 8 - Do you have any comments on the suggested data set for adding a carbon element to the formula? Are there further alternatives you would like to suggest?

We are pleased to see carbon included in the formulae. In particular, we note that the data is based on road transport emission figures for 2010. We believe this measure could act as a useful replacement for the congestion element as increased carbon production is closely linked with increased congestion. This approach would not only allow carbon to be included but would also remove the perverse incentive described in our response to question three.

Question 9 - Should economic growth be part of the IT Block formula?

A measure of economic growth could be useful but there are close similarities with the Objective one Area element.

Question 10 - Do you have any comments on the use of employee earnings for measuring economic growth? Are there further alternatives you would like to suggest?

The use of employee earnings for measuring economic growth is quite a binary measure and an increase in the measure could be attributable to a range of inputs separate to the IT Block funding. One measure we would put forward as an alternative measure which recently came out of the 2011 Census is the % of people who walk to work

Question 11 - Do you have any further comments on Option 2?

We are concerned that the inclusion of trend data through average journey times in option one could act as a disincentive to local authorities adopting 20mph limits as recommend in the Department's recently published Speed Limit Guidance². We are also concerned that infrastructure for pedestrians such as road crossings could be reduced and restricted as local authorities are driven to smoothing traffic flow to reduce vehicle journey times at the expense of pedestrian journey times and comfort.

² Setting local speed limits: Department for Transport circular 01/2013 - <https://www.gov.uk/government/publications/setting-local-speed-limits>

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Question 12 - Do you have any comments on Option 3?

We are concerned that the inclusion of trend data through average journey times in option one could act as a disincentive to local authorities adopting 20mph limits as recommend in the Department's recently published Speed Limit Guidance³. We are also concerned that infrastructure for pedestrians such as road crossings could be reduced and restricted as local authorities are driven to smoothing traffic flow to reduce vehicle journey times at the expense of pedestrian journey times and comfort.

Question 13 - Do you have any suggestions for how walking and cycling data might be included in the funding formula?

We welcome the suggestion of including an additional element to take into account walking and cycling. However, walking and cycling are very different travel modes so each travel mode would need to be taken separately. In terms of walking we believe this can be included in the trend data section to encourage local authorities to increase the percentage of their population walking. This would also build on the recent rounds of Local Sustainable Transport Funding to support walking and cycling projects⁴.

Furthermore, we would recommend that this element is weighted at a higher level than congestion (if this element was retained in the formula) in order to support the road user hierarchy which puts the pedestrian at the top of the road hierarchy and motor transport at the bottom as outlined in the Department's publication *Manual for Streets*⁵.

We agree that local authorities with a higher prevalence of residents walking and cycling would receive a larger allocation of funding, however, this should not only be reflected in a needs element as this would merely provide passive support for local authorities to invest in walking infrastructure. Rather, an active approach needs to be taken which could see 25% based on a "needs" element and 75% on trend data in order to encourage local authorities to continue to support increases in the prevalence of residents walking.

Question 14 - Do you think the Department should base weightings on current transport priorities, rather than historic spend patterns?

Yes, we agree.

Question 15 - Which elements in the formula should be given the heaviest weighting?

We believe congestion should be removed from the weightings and replaced by a carbon measure instead or should be significantly downgraded. We would like to see a new walking and cycling element incorporated with the heaviest weighting to reflect the road user hierarchy which puts the pedestrian at the top of the road hierarchy and motor transport at the bottom as outlined

³ Setting local speed limits: Department for Transport circular 01/2013 - <https://www.gov.uk/government/publications/setting-local-speed-limits>

⁴ <https://www.gov.uk/government/publications/local-sustainable-transport-fund>

⁵ Manual for Streets – Department for Transport <https://www.gov.uk/government/publications/manual-for-streets>

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in the Department's publication *Manual for Streets*⁶. This approach would build on the impact of the Local Sustainable Transport Fund and support cross Government priorities such as school travel through increased numbers of children walking to school (Department for Transport) and increased number of people walking to reduce the health impacts of sedentary behaviour such as obesity, type 2 diabetes and heart disease (Department of Health).

Question 16 - The Department is not considering changes to the data sets used for four elements of the existing formula: Objective One Areas, public transport, accessibility and air quality. Do you agree with this approach?

We would suggest that the opportunity to reflect the % of people living within 15 minutes walk of a school or workplace as detailed in the transport accessibility data set⁷ should be investigated for inclusion. This would support local planning policy in ensuring local communities have local services and facilities such as GP surgeries, schools and bus stops within walking distance of new developments.

Question 17 - Do you have any comments on the two alternatives for the road safety element of the formula? Are there further alternatives you would like to suggest?

We would recommend a combination of need and trend data in order to ensure those local authorities with historically poor road safety records are supported but to also recognise where improvements in road safety have taken place.

Question 18 - Do you see any problems with the current measure for congestion? Do you have any comments on the suggested alternative? Are there further alternatives you would like to suggest?

We are concerned that the inclusion of trend data through average journey times in option one could act as a disincentive to local authorities adopting 20mph limits as recommend in the Department's recently published Speed Limit Guidance⁸. We are also concerned that infrastructure for pedestrians such as road crossings could be reduced and restricted as local authorities are driven to smoothing traffic flow to reduce vehicle journey times at the expense of pedestrian journey times and comfort.

Question 19 - The Government is keen for local authorities to provide more transparency around spending on small transport projects. Do you have any views on how this might be achieved?

The Government could support professional and third sector organisations to celebrate success through best practice websites and dissemination events.

⁶ Manual for Streets – Department for Transport <https://www.gov.uk/government/publications/manual-for-streets>

⁷ ACS04 - Travel time, destination and origin indicators to key sites and services, by local authority - <https://www.gov.uk/government/statistical-data-sets/acs04-travel-time-destination-and-origin-indicators-to-key-sites-and-services-by-local-authority>

⁸ Setting local speed limits: Department for Transport circular 01/2013 - <https://www.gov.uk/government/publications/setting-local-speed-limits>

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Question 20 - Do you have any other issues that you would like to raise about the calculation or distribution of the IT Block Funding?

No

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