Mayor’s Transport Strategy

About Living Streets

We are Living Streets, the UK charity for everyday walking. We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illnesses and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone. Our ambition is to enable people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking.

Summary

Living Streets strongly supports the Mayor’s vision for 80% of journeys to be made on foot, cycle or public transport by 2041. To make this happen we call on the mayor to:

- Urgently set out proposals to reform the current congestion charge this term and commit to developing the next generation of road user charging for the whole of greater London.
- Bring forward a London-wide reallocation of road space from cars to people walking and cycling
- Make 20 mph the default speed limit on all London’s roads
- Cancel the Silvertown tunnel and build no more new roads designed around motor vehicles
- Pedestrianise Oxford Street and Parliament Square
Consultation response

Chapter 1: The challenge
Question 1: To what extent do you agree or disagree with the aims set out in this chapter?

This chapter gives a good summary of the issues affecting London now and over the next 25 years.

Living Streets supports the key principle that projected increases in population do not need to generate additional private vehicle trips if London’s transport system is planned properly and walking and cycling is encouraged and enabled.

The assessment of the problems of motorised vehicles is supported, including the role of motorised vehicles in generating air pollution, their role in poor health and inactivity and the problem of taking up too much road space relative to the number of people carried.

We expect to see a focus on the health of children.

We support the assessment of London’s streets as being poorly designed for their current purposes, as places or for sustainable transport.

We believe the transport strategy should include a significant London-wide reallocation of road space from private vehicles to cycling and walking.

The road danger assessment is incomplete. Although the larger vehicles described are potentially dangerous, and collisions with them are more likely to result in death, lives are also endangered by smaller vehicles. ¹ This is especially the case in places where the design of streets is poor or speed limits have not been reduced to 20 mph.

We believe this assessment of road danger should be widened to cover all situations and vehicle types that cause pedestrians to be killed and seriously injured.

Chapter 2: The vision
Question 2: The Mayor’s vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80 per cent of Londoners’ trips will be made on foot, by cycle or using public transport. To what extent do you support or oppose this proposed vision and its central aim?

We support this aim and we support the ordering of transport modes used throughout the strategy.

However, considering the long timeframe, we would like to see the Mayor publish interim targets towards this aim to galvanise action.

Trips should be encouraged to be taken by the most sustainable transport mode possible with walking the top priority, followed by cycling and public transport. This prioritisation is essential because this strategy aim is not broken down by transport mode.

The assumption must be that trips should be completed by walking wherever this is possible.

We support the principle that the shift away from the use of the motor car will be vital to achieving this. We therefore support a significant programme of reallocation of road space away from motorised vehicles to walking and cycling to achieve this.

We support the specific aim to increase walking.

However, walking rates for primary school children in London at 46% are lower than the country as whole. As London is more dense and walkable than much of the rest of the country we expect to see a commitment to investigating and dealing with this disparity.

We expect to see a target to achieve the Cycling and Walking Investment Strategy aim of 55% primary school children walking to school and we expect to see London achieve this before the national target date of 2025.

We strongly support the Healthy Streets Approach as a way of delivering better streets for everyone in London.

Question 3: To support this vision, the strategy proposes to pursue the following further aims. To what extent do you agree or disagree with the aims set out in this chapter?

a) by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day

We support this ambitious aim and encourage the creation of a detailed plan to achieve this.

However, Living Streets, believe the current date of 2041 is not ambitious enough and that the Mayor should aim to achieve this by 2030. We have previously supported Public Health England and London Assembly Health Committee in calling for the equivalent target by 2030 (for 70% of Londoners reporting 2 x 10minutes of active travel on the previous day; the current figure is 34%).

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2 National Travel Survey

We expect this to include an ambition that all children who can walk to school will walk to school.

We expect to see a strategy for making older people more active.\(^4\)

Those who commute to work by car are the most difficult to encourage to shift modes.\(^5\)

We would also expect to see a strategy to encourage mode shift to active travel for Londoners who are dependent on motor cars and have very low levels of physical activity.

We recommend that this plan includes working with partners with expertise in these areas to encourage active travel. For children walking to school, Living Streets run a successful behaviour change programme in some London schools. This must be rolled out to all schools in Greater London to achieve this aim for younger people.\(^6\)

b) for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041

We support the adoption of Vision Zero principles. The evidence is clear that 20 mph speed limit policy reduces speeds and reduced the number of collisions that result in death.\(^7\) We also welcome the target and interim targets to reduce the number of people killed and seriously injured on London’s streets.

We expect to see a detailed plan to achieve Vision Zero. It must include the adoption of 20 mph speed limits as the default on all London streets as soon as possible.

We expect the Mayor of London to use his advantageous position as leader of Transport for London as well as the Metropolitan Police Service to ensure that 20 mph zones and pavement parking bans are enforced, prioritised in police planning and allocated adequate resources.

c) for all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London’s entire transport system to be zero emission by 2050

We support steps to reducing air pollution in London. In addition to encouraging cleaner vehicles the number of motor vehicle trips must be reduced, including by electric cars. Braking systems are responsible for particulate matter air pollution and are not restricted to diesel/petrol vehicles. Energy, which will not necessarily be clean energy is produced when vehicles are manufactured and when the energy they consume is produced.

d) by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public

\(^4\) https://www.livingstreets.org.uk/what-we-do/projects/walking-with-older-people
\(^5\) https://travelbehaviour.com/outputs-commuting-wellbeing/
\(^6\) https://www.livingstreets.org.uk/what-we-do/projects/wow
We support the reduction in traffic volumes. This must be accompanied by a London-wide comprehensive reallocation of road space from motor vehicles to people on foot and cycling.

e) to open Crossrail 2 by 2033

We support the delivery of Crossrail 2. Encouraging more trips by public transport will increase the number of walking stages taken overall. However, the development of Crossrail 2 must be accompanied by high quality public realm improvements around stations that enable walking stages for onward journeys.

f) to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor

We support the delivery of a suburban metro. Transport for London has a proven record of encouraging more trips by London Overground when routes are taken over. By increasing the number of public transport trips, the number of walking stages taken also increases. However, existing stations managed by train operating companies often have poor accessibility and low quality public realm. Walking conditions are often poor and disabling for the most vulnerable users attempting to access stations. The delivery of a suburban metro must be accompanied by high quality public realm improvements around stations that enable walking stages for onward journeys.

g) to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared with the full network

All Transport for London stations should be accessible.

We expect to see all London Underground stations on the pedestrianised Oxford Street to have step-free accessibility to ensure this new public space is accessible to all.

h) to apply the principles of good growth

We support the principle of good growth and encourage this to be present in transport and spatial planning strategies. The Healthy Streets indicators should be applied planning policies to ensure new developments are being designed towards the same aims the transport strategy.

We expect to see a commitment to all new trips generated in London to be made by walking where possible and then by cycling and public transport.
Chapter 3: Healthy Street and healthy people

Question 4: Policy 1 and proposals 1-8 set out the Mayor’s draft plans for improving walking and cycling environments (see pages 46 to 58). To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.

We support policy 1.

We support the proposals to create Liveable Neighbourhoods and Healthy Routes and to remove street clutter.

We encourage the use of community street audits, identifying problematic design and street furniture to make spaces fit for walking and accessible to all.\(^8\)

We support the proposal to transform major public spaces in Central London.

We expect to see Oxford Street and Parliament Square pedestrianised.

We support improvement of the Walk London network and encourage its development as a network for utility walking, connecting people with works, school, shopping and leisure. We support improvements to wayfinding through roll out of Legible London.

We expect to see high quality onward journey wayfinding at all Underground, Overground and other rail stations.

We support working with community and other groups to encourage walking.

Proven behavioural change programmes like the Living Streets WOW initiative should be rolled out to all schools in Greater London to have an immediate impact and get more children walking to school.\(^9\)

We support cycling improvements, in particular segregated cycle lanes, and this is beneficial to walking safety and perception of safety.

We support the temporary closure of streets to allow their use as places and to help consider how they could be used differently.

Question 5: Policy 2 and proposals 9-11 set out the Mayor’s draft plans to reduce road danger and improve personal safety and security (see pages 62 to 67). To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security? Please also describe any other measures you think should be included.

We support the adoption of Vision Zero principles. The evidence is clear that 20 mph speed limit policy reduces speeds and reduced the number of collisions that result in death.\(^10\)

\(^8\) https://www.livingstreets.org.uk/what-we-do/projects/community-street-audits
\(^9\) https://www.livingstreets.org.uk/what-we-do/projects/wow
We expect to see a detailed plan to achieve Vision Zero. It must include the adoption of 20 mph speed limits as the default on all London streets as soon as possible.

We support proposals to introduce road danger reduction measures at places that pose greatest risk to vulnerable road users.

We expect the Mayor of London to use his advantageous position as leader of Transport for London as well as the Metropolitan Police Service to ensure that 20 mph zones and pavement parking bans are enforced, prioritised in police planning and allocated adequate resources.

Question 6: Policy 3 and proposals 12-14 set out the Mayor’s draft plans to ensure that crime and the fear of crime remain low on London’s streets and transport system (see pages 68 to 69). To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London’s streets and transport system? Please also describe any other measures you think should be included.

We support policy 3 to reduce crime and fear of crime. We support proposals to ‘design out crime’ through proper lighting and removing places for crime to take place.  

Question 7: Policy 4 and proposals 15-17 set out the Mayor’s draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78). To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets? Please also describe any other measures you think should be included.

We support policy 4. We support a programme to reduce inefficient vehicle use, by mode shift from private vehicles and by encouraging innovative consolidated delivery practices. These have already been trialled in the West End and should be expanded to anywhere they could bring benefit.

Question 8: Proposals 18 and 19 set out the Mayor’s proposed approach to road user charging (see pages 81 to 83). To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.

We support road user charging. London faces critical congestion and air pollution problems now, with illegal levels of air pollution.

We fear the transport strategy risks being unable to deliver on its aims through a lack of commitment to developing the next generation of road user charging for the whole of greater London.

We expect to see comprehensive road pricing brought forward as soon as possible, with differential pricing for the most polluting vehicles.

And the Mayor must urgently set out proposals to reform the current congestion charge this term under proposal 18. This should include: a review of the exemptions of the current CCharge; the effect of price increases; and operating a charge over extended weekday hours and or at weekends.

We expect to see the ULEZ scheme rolled out faster, covering more of London and using a more stringent standard.

The Blackwall tunnel should be tolled immediately, to control demand, rather than after the construction of the expensive and unnecessary Silvertown tunnel.

**Question 9:** Proposals 20 and 21 set out the Mayor’s proposed approach to localised traffic reduction strategies (see page 83). To what extent do you agree or disagree with this approach? Please also describe any other measures you think should be included.

We support proposals 20 and 21 to reduce traffic through local strategies.

**Question 10:** Policies 5 and 6 and proposals 22-40 set out the Mayor’s draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103). To what extent do you agree or disagree that these plans would help London become a zero carbon city? Please also describe any other measures you think should be included.

We support policies 5 and 6 to make London’s air pollution levels compliant with legal limits as soon as possible. However, there is no safe level of air pollution.

We expect to see measures to continue to reduce air pollution once compliance has been reached.

**Question 11:** Policies 7 and 8 and proposals 41-47 set out the Mayor’s draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111). To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

We support policies 7 and 8.
Chapter 4: A good public transport experience

Question 12: Policy 9 and proposal 48 set out the Mayor’s draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling. To what extent do you agree or disagree that these plans would provide an attractive whole-journey experience? Please also describe any other measures you think should be included.

We support the use of the Healthy Streets approach to transport interchanges and encourage the use of high quality walking environment, wayfinding and segregated cycling facilities.

Question 13: Policies 10 and 11 and proposals 49 and 50 set out the Mayor’s draft plans to ensure public transport is affordable and to improve customer service. To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport? Please also describe any other measures you think should be included.

We support policies 10 and 11 to make fares affordable.

We expect that fares for very short journeys are not so low that they discourage walking.

Question 14: Policy 12 and proposals 51 and 52 set out the Mayor’s draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan. To what extent do you agree or disagree that these plans would improve accessibility of the transport system? Please also describe any other measures you think should be included.

We support policy 12. We expect to see all stations and services under the control of the mayor to be accessible to all Londoners.

Question 15: Policy 13 and proposals 53 and 54 set out the Mayor’s draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed. To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

We support policy 13.

We expect to see high quality walking routes between the homes of all Londoners and the nearest bus stop to make the network truly accessible.
Question 16: Policy 14 and proposals 55 to 67 set out the Mayor’s draft plans to improve rail services by improving journey times and tackling crowding. To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

We support policy 14. We support increasing the number of public transport trips, especially where this a modal shift from motor car journeys, as this will increase the total number of walking stages.

Question 17: Policies 15 to 18 and proposals 68 to 74 set out the Mayor’s draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully-inclusive and well-connected public transport system. The Mayor’s policy to support the growing night-time economy is also set out in this section. To what extent do you agree or disagree that these plans would deliver a well-connected public transport system? Please also describe any other measures you think should be included.

We support policies to encourage modal shift from private motor vehicles and expect walking to be the preferred mode where possible. We support proposals to make London safe to get around at night.
Chapter 5: New homes and jobs

Question 18: Policy 19 and proposals 75 to 77 set out the Mayor’s draft plans to ensure that new homes and jobs are delivered in line with the transport principles of ‘good growth’ (see pages 193 to 200). To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

We support the delivery of new housing using the good growth principles.

We expect to see homes built on the edge of London and as part of regeneration to have excellent walking facilities, including connections to shops, schools, workplaces, stations and bus stops.

We support proposal 76 for embedding active travel into new developments.

Question 19: Proposals 78 to 95 set out the Mayor's draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving existing public transport services, providing new river crossings, decked roads and transport infrastructure and building homes on TfL land (see pages 202 to 246). To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth? Please also describe any other measures you think should be included.

We support proposals to set a high mode share for developments within the central activities zone, opportunity areas and town centres.

We do not support any additional river crossings used by motor vehicles, including the Silvertown tunnel.

We support new crossings of the river designed for walking, cycling and public transport only.

Question 20: Policy 20 and proposal 96 set out the Mayor’s proposed position on the expansion of Heathrow Airport (see pages 248 to 249). To what extent do you agree or disagree with this position? Is there anything else that the Mayor should consider when finalising his position?

No response.
Chapter 6: Delivering the vision

Question 21: Policy 21 and proposals 97 to 101 set out the Mayor’s proposed approach to responding to changing technology, including new transport services, such connected and autonomous vehicles (see pages 258 to 262). To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

We support policy 21. As mode shift is achieved and new services emerge, road space must be reallocated from motor cars to people walking and cycling.

Question 22: Policy 22 and proposal 102 set out the Mayor’s proposed approach to ensuring that London’s transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269). To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

We are concerned that in the absence of an operational grant from government that maintenance of roads will be funded by public transport fares.

Comprehensive road user pricing must be brought forward as soon as possible to fund maintenance of roads in London.

Question 23: Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor’s approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283). To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

We support policies 23 and 24. As borough councils will be delivering many road improvement schemes we expect to see robust monitoring and evaluation.

Question 24: Are there any other comments you would like to make on the draft Mayor’s Transport Strategy?

No response.