

Integrated Transport Strategy:

Living Streets' response to the call for ideas

February 2025

Introduction

1. We are Living Streets, the UK charity for everyday walking. Our mission is to achieve a better walking environment and to inspire people of all generations, backgrounds, and disabilities, to enjoy the benefits of walking and wheeling.
2. Our campaigning led to the UK's first zebra crossings and speed limits. Now our campaigns and local projects deliver real change to overcome barriers to walking, and our ground-breaking initiatives such as the world's biggest Walk to School campaign enabling millions of people to walk. When walking is prioritised, we create better places to live and work.

Summary

Living Streets welcomes this opportunity to respond to the Government's call for ideas. We support the proposal for an integrated transport strategy as a basis for meeting wider economic, social and environmental outcomes (e.g. reducing greenhouse gas emissions), and, as a means of delivering better value for money. In our view:

- A joined up transport network is one that enables people to walk or wheel from one mode of transport to another, affordably, confidently and conveniently through every stage of their journey. This is supported by appropriate infrastructure in well planned places.
- Data can be used to improve the transport network, for example, by setting appropriate targets, measuring progress and to identify where to prioritise spending (e.g. to achieve zero road deaths). While information technology (e.g. Mobility As A Service) has a lot of promise, travel information should be publicly accessible to everyone without having to use a smartphone.
- The use of trenchless technology is long overdue – to put utilities under our streets without the constant need to keep digging up our pavements and the carriageway. This would improve the long term maintenance of our road transport network.
- Investment in the transport network should be assessed (validated) against its contribution to the vision set by the integrated transport strategy and wider public policy goals. This requires roads spending to be re-balanced towards better infrastructure (and services) walking, cycling and public transport.

- An integrated transport strategy requires a clear vision of what it seeks to achieve (e.g. greater choice and traffic reduction), together with measurable targets and funding at a time when costs are rising. This requires rebalancing how funds are distributed: towards active and sustainable modes of transport; repairing and renewing existing infrastructure; equitable transport costs, and; creating a safe transport system.

1. In your opinion, how could the transport network be more joined up?

A joined-up transport network is one which:

- Recognises that every journey begins and ends with walking and prioritises improvements to walking and cycling networks (e.g. to bus and railway stations and interchanges) to enable greater uptake of public transport.
- Provides integrated timetabling, ticketing and information.
- Enables the integration of shared transport (e.g. car or bikeshare), community transport, schools transport and taxis with public transport planning to enable seamless journeys without the need to rely on private transport – including access to air and sea transport.
- Provides of mobility hubs – places that bring together active, public and shared modes of transport – to facilitate interchange between modes, including shared transport options (see question 2).

Transport planning must be integrated with land use planning. Housing targets have driven car-dependency in rural and semi-rural areas; this is the wrong place for development. Housing need must be matched with intelligent consideration of how people will travel day to day. There is a need for a transparent data-led test that local authorities, developers, the public and public inquiry inspectors can all use to identify whether a proposed development site or an actual development is likely to support reduced car dependence or worsen it. The Government should consider how the Department for Transport's [Connectivity Tool](#) could be further developed to support this aim.

Subnational Transport Bodies (STBs) are helping local transport authorities to set evidence-based Quantifiable Carbon Reduction (QCR) targets in their Local Transport Plans (LTPs)ⁱ. They could also support local planning authorities (or unitary authorities) to coordinate where new homes should be built, to support sustainable transport objectives.

Higher density development, alongside proximity to jobs, services and amenities by active and sustainable transport has to be *planned for*. It should determine the location and quantity of new homes. For example, residential housing densities of more than 40 dwellings per hectare can cut driving by a factor of threeⁱⁱ. However, developer contributions are often expected to pay for active, affordable, green, locally distinct, and sustainable places. There is a risk that in some areas revenues raised will be insufficient to provide these 'nice to haves' (because developments fail to meet viability thresholds or land values are too low etc.) and infrastructure that supports active and sustainable travel will remain out of reach for the people who need it most.

Transport planning must also be integrated with other Government missions for economic growth, health, tackling barriers to opportunity, safer streets, net zero. Reducing car-dependence and supporting a wider range of active, clean, healthy and affordable transport options supports them all.

2. How could data be used to improve the transport network?

Setting targets and prioritising investment

Data (e.g. the National Travel Survey) should be used to set ambitious targets and to measure progress, for example, towards a shift to active and sustainable modes of transport. Data could also be used to prioritise investment – for example:

- Using road safety statistics (numbers of people killed or seriously injured (KSI)) to direct spending where it is needed to create a Safe Systems (see more in response to question 5).
- Using the Department for Transport's connectivity tool to identify the best locations for mobility hubs.

Data and mobility as a service (MAAS)

Smartphones and the sharing of mobile data are key to the development of Mobility As A Service (MAAS) platforms, offering scope to integrate timetables, ticketing and wayfinding across all modes. In practice the ability of MAAS platforms to use data to offer wider choice and encourage active and sustainable modes of transport is limited by data compatibility across service providers and depends on external factors, such as the availability of public transport, its cost, the predictability of journey times (i.e. the ability to reliably plan your journey) and congestion (which affects journey reliability or propensity to walk or cycle). Information should be accessible without having to use a smartphone (e.g. providing all bus or rail users real time audio or visual information on services and delays). This is important from an equity perspective; many people have difficulty navigating everything online.

3. How could technology be used to improve the transport network?

Trenchless technology

A pedestrian is most likely to encounter new technology in the form of micromobility and wheeled drone delivery robotsⁱⁱⁱ. Alongside the rapid spread of electric vehicles and their charging infrastructure and the surveillance of 'street hubs'^{iv}, these provide new challenges for people walking. At street level, an integrated transport strategy must address increasing competition for footway space – alongside existing demands from signs and advertising, utility works and furniture, vehicles parked on pavements and people scooting or cycling on the footway. Opportunities to innovate include the use of 'trenchless technology'^v – the use of subsurface methods, materials and equipment to instal new or replace existing underground infrastructure with minimal disruption to surface traffic, business, and other activities. This would avoid the constant digging up of footway and carriageway by utilities companies which reduces the lifespan of their surfaces. Trenchless technology has been available for decades and would be more expensive for utility companies, but it would create savings in the long term. Instead, the cost of poor quality reinstatements, repeated maintenance, failing infrastructure and pedestrian falls is footed by the taxpayer. It's estimated that pedestrian falls could cost up to £0.5 billion annually in health and social care costs (see question 5).

Micromobility

Living Streets supports the idea of micromobility as a means of reducing the number of short trips by car (reducing people's carbon footprint) and increasing access to public transport. However, the reality creates many challenges for pedestrians. The most obvious problem is that rented e-bikes and

e-scooters cause an obstruction when they are dumped on our pavements. E-scooters are relatively new on our roads, but like e-bikes (and bicycles) they are fast, silent and can be dangerous when used on pavements. Government must now legislate for their construction (e.g. maximum power of 250W and maximum speed of 12.5mph as in London e-scooter trials) and use – including enforcement against scooter use on pavements.

Autonomous vehicles

The development of autonomous vehicles (AVs) raises critical ethical, moral and practical questions around how AVs are programmed to behave when exposed to pedestrians on the street, and who or what is responsible for road behaviour when something goes wrong. Human error is predictable (this is the premise of Vision Zero). It can only be reduced when/where humans are removed from the equation. Interaction of AVs with vehicles, pedestrians, cyclists etc that are not AV will continue to be unpredictable. For this reason, AVs should not be permitted on public roads until a high degree of safety can be guaranteed, without relying on human intervention at critical moments. Automated vehicles could be limited to specific infrastructures (e.g. guided busways) and speeds until safe operation can be guaranteed. Technology should not be introduced at the expense of pedestrian or cyclist freedom to use the highway safely and conveniently.

Crossings

Demand responsive technology can be used to improve the pedestrian experience at signalised crossings. Supported by a grant from UCL Engineering Exchange, London Living Streets campaigners worked with Transport for London (TfL) to improve how signalised crossings operate for the benefit of those on foot. A total of 36 LLS members and supporters spent 270 hours over 45 sessions interviewing a total of 3947 crossing users at 12 crossings. The crossings were selected by TfL network managers to be representative of London's crossings and to be capable of having the pedestrian wait time modified within the time-frame of the study. Wait time reductions of 30 seconds or more resulted in a statistically significant increase in the scores given by users.

Wayfinding

Network information and route planning should prioritise journeys by appropriate modes according to journey distances – i.e. give priority to walking routes for distances of under a mile and spotlight more sustainable journeys by public transport.

4. How, if at all, would you improve the ways decisions are made about the transport network?

The transport appraisal process should be reviewed to ensure that transport schemes and new developments are assessed against how they contribute to the objectives of the integrated transport strategy. Moving beyond 'predict and provide' means ensuring that transport schemes are also validated based on their contribution to wider public policy goals (e.g. reduction of carbon emissions and benefit to public health) to reflect a broader definition of value for money.

Re-valuing and 're-balancing' transport spending (see more in answer to question 5) towards walking and cycling would help to achieve the Government's mission of 'breaking down barriers to

opportunity'. It has been estimated that the most affluent 10% of the population receive almost four times as much public spending on their road transport needs as the poorest 10%^{vi}. This discriminates against the 20% of households in England (excluding London) who have no access to a car (or who for other reasons are unable to drive e.g. age, health or disability) and rely on walking, cycling or public transport instead^{vii}. Changing travel patterns show that fewer young people are choosing to drive, and car traffic growth has slowed in recent years^{viii ix x}. The proportion of car-free households and levels of transport inequality increase to nearly 50% in the lowest income quintile^{xi}. People living in deprived areas are either disproportionately affected by the cost of car dependence or by the impacts of having to live, work and walk next to busy, dangerous, noisy and polluted streets.

5. Any other comments?

A clear vision

The new Integrated Transport Strategy will need to set out a clear vision of what it is seeking to achieve (and how it links to related strategies e.g. the new Road Safety Strategy). This vision should be substantiated by clear and measurable objectives and targets – e.g. traffic reduction targets to meet WHO guidelines for clean air – to reduce the number of vehicles on our roads and/or increase the proportion of journeys by active and sustainable modes. The strategy should also set out how these objectives will be monitored, and, how they dovetail with the policies and objectives of the authorities responsible for delivery (e.g. local authorities, Subnational Transport Bodies, National Highways and Great British Rail).

Rebalanced spending

A report by Transport for Quality of Life (TfQL) found that achieving a 20% reduction in car-km by 2030 will require an 80% increase in rail passenger-km by then and a 120% increase in passenger-km by bus and trams / light rail^{xii}. Yet these increases would still leave public transport usage in Britain below the levels of those of other European city regions. Achieving these increases will require an annual average of £10bn of additional capital spending on public transport over the next 12 years, while annual operational spending will need to rise by around £19bn by 2030.

A National Audit Office report on active travel investment^{xiii} revealed evidence commissioned by DfT, showing that it would have required total spending of £7bn on active travel to come close to meeting the walking and cycling targets set in DfT's 2nd Cycling and Walking Investment Strategy (CWIS2)^{xiv}. Yet CWIS2 actually envisaged around £3.8bn of spending over 5 years, an amount that was later cut. It will now require even more than this to meet the Government's target to increase walking and cycling to 50% of urban trips by 2030. An IPPR report^{xv} for Cycling UK has called for over £2bn of *annual* spending on active travel, amounting to around 10% of total transport spending.

These sums could be raised partly by reducing spending on new road capacity that will not be needed in a future where motor traffic growth is halted and reversed. Building roads is hugely damaging to the climate and local environment (including air quality, noise, habitats, landscape etc), while failing to tackle congestion or provide the economic benefits that are often claimed (again, see the TQL report).

Further funding could be raised through road user charging and/or workplace parking levies, designed to tackle both the global (climate) and local (air quality etc) impacts of motor transport.

Public support for the principle of road user charging has increased greatly since 2007,^{xvi} with even higher levels of public support achieved (62% or higher) if the funding is used to improve public transport and tackle air quality and climate impacts. However road user charging needs to be fair. The Commons Transport Committee^{xvii} and Green Alliance^{xviii} have called for a commission to assess how these objectives can be achieved.

Focus on repair and renewal

Spending must be focused on the maintenance and renewal of existing infrastructure – instead of building expensive new roads. A YouGov poll commissioned by Living Streets found that 48% of adults over 65 would walk more if pavements were better maintained, meaning that a lack of investment in footway maintenance contributes to physical inactivity and social isolation. Poorly maintained footways also cause pedestrian falls; older people are more severely injured and impacted by falls outdoors (e.g. loss of fitness and independence). Living Streets' report on pedestrian slips, trips and falls (2023^{xix}) found that ongoing health and social care costs for the NHS and local authorities could be as much as £0.5billion annually. These figures show a clear case for investment in pavement infrastructure to prevent future costs to the taxpayer.

Between 2019-2021, a comprehensive assessment of the nation's footways was carried out by Gaist on behalf of the Department of Transport (DfT). They estimated an average total cost 'of all maintenance operations that would need to be carried out to either address poor condition on a footway or to preserve the footway in its current condition and prevent further deterioration' in England (excluding London) of £1.695bn. Our research suggests that this investment would be returned within the length of a parliament.

Rebalancing transport user costs

Between 2011 and 2023, bus fares rose by 76% and rail fares by 50%, while petrol costs went up by just 23%^{xx}. Already by 2020, the policy had resulted in 5% extra motor traffic^{xxi}, and hence an extra 5 million tonnes of CO₂ emissions and 15,000 tonnes of NOx emissions, together with £250m lost income from reduced bus patronage and £75 from lost rail patronage. It has now cost the Exchequer over £100bn^{xxii}, with the lowest income groups being hardest hit by the resulting cuts to services. With fuel duty revenues set to dwindle anyway as petrol and diesel vehicles are replaced by electric vehicles, there is a growing fiscal case - as well as an environmental and equity case - for introducing a fair form of road user charging to replace it, in ways that also achieve climate, air quality and other goals.

Urban logistics

Action is needed to reduce the number of large lorries to operate on urban streets. Urban logistics hubs^{xxiii} or urban consolidation centres^{xxiv} can enable larger lorries to transfer their goods onto smaller urban vehicles for the 'last mile' (e.g. the use of cargo bikes). Recent research by the Active Travel Academy^{xxv} commissioned by the charity Possible, found that cargo bikes made urban deliveries around 60% faster than vans (delivering 10 parcels per hour, compared with 6 per hour for vans), as well as reducing congestion, road danger, air pollution and greenhouse gas emissions.

Improving safety

The promised road safety strategy should adopt the principles of 'road danger reduction'^{xxvi} (eliminating road danger at source) and of 'vision zero'^{xxvii} (eliminating all road deaths and serious injuries). The latter involves taking a systematic approach to reducing the sources of danger) set out in the 'safe systems' approach^{xxviii}. Key elements of a safe system are:

- *Safe road and path networks*: people of all ages and abilities should feel able and confident to walk or wheel (or cycle). That means (a) safe pavements with even surfaces, free of pavement parking and other obstructions (b) safe cycle networks consisting of roads where motor traffic volumes and speeds are low enough to allow people of all ages and permit safe sharing with motor vehicles, or separate cycle lanes and tracks (c) safe junctions and crossings, and (d) local restrictions on through traffic, including traffic filters and school streets^{xxix}.
- *Safe road users*: (a) Awareness campaigns, e.g. to boost understanding of recent Highway Code changes^{xxx} thereby tackling road users and behaviours which cause the greatest risk to others (rather than the victims); backed by (b) a review of road traffic offences and penalties^{xxxi}, with a greater emphasis on driving bans, in order to strengthen public protection.
- *Safe vehicles*: initiatives such as the uptake of direct vision lorries, following the model pursued in London^{xxxii}.
- *Safe speeds*: 20mph to be the default for built-up streets, with most rural single-carriageways being reduced to no more than 40mph. With necessary enforcement to ensure compliance.
- *Safe post-crash response*: better data on the legal system's responses to road collisions, better support for road crash victims.

For further information please contact:

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ⁱ See [Carbon Assessment Playbook](#)

ⁱⁱ Friends of the Earth, Lisa Hopkinson and Lynn Sloman, Transport for Quality of Life (February 2019) Planning for less car use. <https://policy.friendsoftheearth.uk/insight/planning-less-car-use>

ⁱⁱⁱ See for example [Starship grocery delivery robots go live in Leeds today - with 20,000 people within radius and two Co-op stores taking part | Yorkshire Post](#)

^{iv} See for example [Street Hubs | BT Business](#)

^v See for example [History - UKSTI](#), established in 1993.

^{vi} Sustainable Development Commission (2011) Fairness in a car-dependent society <http://www.sd-commission.org.uk/pages/fairness-in-a-car-dependent-society.html>

^{vii} Department for Transport (2017) British Social Attitudes Survey 2017: Public attitudes towards transport. Table ATT0322 <https://www.gov.uk/government/statistical-data-sets/att03-attitudes-and-behaviour-towards-roads-and-road-travel>

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- viii Marsden, G. *et al.* (2018) All Change? The future of travel demand and the implications for policy and planning. First Report of the Commission on Travel Demand http://www.demand.ac.uk/wp-content/uploads/2018/04/FutureTravel_report_final.pdf
- ix Theo Leggett (6 January 2020) New car registrations at lowest level since 2013, BBC News <https://www.bbc.co.uk/news/business-50985412>
- x Roger Harrabin (18 July 2018) Are young people going cool on cars? BBC News <https://www.bbc.co.uk/news/science-environment-44849381>
- xi Department for Transport, 2018. Table NTS0703, National Travel Survey 2018: England <https://www.gov.uk/government/statistical-data-sets/nts07-car-ownership-and-access>
- xii See <https://www.transportforqualityoflife.com/reports/public-transport-fit-for-the-climate-emergency>
- xiii See [Active Travel in England - NAO report](#)
- xiv See [The second cycling and walking investment strategy \(CWIS2\) - GOV.UK](#)
- xv See [Stride and ride: England's path from laggard to leader in walking, wheeling, and cycling | IPPR](#)
- xvi See [Public support charging motorists to use roads, but want it to be done for the right reasons^{SEP} | Ipsos](#)
- xvii See [Is there a case for road pricing in the UK?](#)
- xviii See [Fair share transport tax.pdf](#)
- xix See Living Streets' forthcoming report 'Pedestrian Slips, Trips and Falls: An Evaluation of their Causes, Impact, Scale and Cost', publication date 1st March 2023.
- xx See [Carbon emissions from fuel duty freeze equivalent to putting extra 2m cars on the road | New Economics Foundation](#)
- xxi See [Greener Vision The Unintended Consequences Of Freezing Fuel Duty](#)
- xxii See [Any new fuel duty cut is another giveaway to the rich - Social Market Foundation.](#)
- xxiii See [Urban Logistics Hubs: Summary and Conclusions](#)
- xxiv See [Urban Consolidation Centers – Insights from a Design Thinking perspective - ScienceDirect](#)
- xxv See [The Promise of Low-Carbon Freight](#)
- xxvi See [Road Danger Reduction | Road Danger Reduction Forum](#)
- xxvii See [What is Vision Zero? | Vision Zero Network](#)
- xxviii See [Safe System - PACTS](#)
- xxix See [school streets toolkit.pdf](#)
- xxx See [Most drivers still don't know Highway Code changes one year on | Cycling UK](#)
- xxxi See [Why should the Government review road traffic offences in full? | Cycling UK](#)
- xxxii See [Transport for London DVS and PSS](#)