

## **The draft London Plan and Mayor's Transport Strategy – response from Campaign for Better Transport**

### **An integrated response**

Campaign for Better Transport has long believed in the integration of spatial and transport planning. We welcome the fact that the draft London Plan and Mayor's Transport Strategy have been published together and this is a response to both.

### **Summary**

The draft Plan has several of the policies needed to create the right spatial framework for transport in London. It seeks to reduce the need to travel; endorses a polycentric pattern of development, and supports local centres and amenities accessible on foot and by bicycle. Given the central importance of the principle of reducing the need to travel, which is acknowledged in the draft Plan, more should be said about how the principle is to be implemented.

Neither the draft Plan nor the Strategy shows how transport will contribute to the achievement of London's CO<sub>2</sub> reduction target. Both Plan and Strategy appear to be in favour of sustainable transport modes but this is compromised by the absence of policies to tackle traffic volumes and speed. Without these neither sustainable transport nor environmental objectives can be achieved without policies to tackle traffic volumes and speed.

Not only are such policies absent but the draft Plan and Strategy contain policies that favour and encourage car use. Parking standards have been relaxed, traffic reduction targets have been removed, policies now support increases in road capacity and new road schemes and there is a proposal for abolishing the Western Extension of the Congestion Charge Zone (WEZ) thus increasing traffic in central and inner London

The Transport Strategy does contain a policy that endorses road user charging, a means by which London-wide traffic reduction might be realised and the revenues for transport hugely increased, but the Mayor has said he has no intention of using it.

The failure to tackle car use makes the draft Strategy unviable. At least it is ingenuous about its own shortcomings. It shows that there will be a large gap between CO<sub>2</sub> reduction targets and projected emissions from transport and that congestion on the road network will increase substantially.

## The draft London plan

### Reducing the need to travel

The Strategic Approach, set out in **Policy 6.1** seeks to encourage patterns of development that reduce the need to travel and promote a shift to public transport, walking and cycling (the 'sustainable modes').

We agree with the general approach adopted in the draft Plan which supports a 'hub and spoke' transport pattern focussed on town centres and rejects the case for a self-contained, high-speed, orbital public transport system linking certain outer London centres. The draft Plan is right to endorse a polycentric pattern of development with higher density development and the provision of amenities focused at over 200 outer London town centres (**Policies 2.7** and **2.15** for example). It is also right to provide, in **Policy 4.7**, strong encouragement for retail, commercial and leisure development to be located in town centre sites, or failing that, on the edge of centres and to resist 'inappropriate' out of centre development.

We also welcome the requirement in **Policy 2.15** that boroughs should identify local neighbourhoods where goods and services needed on a day-to-day basis can be accessed on foot. This policy should also encourage local authorities to support existing local shops if they are under threat (for example by providing National Non-Domestic Rate relief).

The policies which seek to reinforce London's neighbourhoods and communities, to support convenience shopping in local and neighbourhood centres and to identify and make good areas underserved with local shopping and services accessible on foot, by bicycle and public transport are also very welcome as is the policy in favour of e-tailing. (**Policies 4.8, 4.9 and 7.1**).

However, in view of its importance the principle of reducing the need to travel should not merely be endorsed among a number of other objectives as it is in draft Policy 6.1. It should clearly be stated how the principle of reducing the need to travel is to be implemented, for instance by:

- Creating high density development capable of supporting a range of local services and amenities
- Locating high density development in town and local centres and at transport hubs
- Improving the provision of local shops and other services and amenities (and resisting their closure)
- Promoting greater proximity of jobs and housing and more local workforces
- Making it less necessary to travel for work and other purposes by, for example, homeworking, teleconferencing, setting up workstations at outer London transport hubs, encouraging e-tailing.

The benefits of reducing car use through spatial planning is shown in inner London where, in many areas, a dense development pattern exists, amenities are near at hand and only 27% of journeys are made by car. This pattern could be replicated in and immediately around many town and local centres in outer London while leaving the spacious character of residential areas unchanged.

### Opportunity areas and Intensification Areas

In spite of policies to promote public transport, walking and cycling, large amounts of car parking have often been approved in major development proposals for example at White City, Stratford City, on the Greenwich Peninsular and very recently at Brent Cross. The new draft London Plan also seeks to promote sustainable modes and a switch from car use. In **Policy 2.13 Opportunity Areas and Intensification Areas** under Planning Decisions it should be added that development proposals should:

- Be designed to reduce car dependency both within the development and in the surrounding area
- Take advantage of the opportunity provided by new, higher density development, and underused rail lines where these exist, to provide new rail based public transport to one or more development sites.

## **Town Centres**

Under **Policy 2.15 Town Centres** a requirement should be added that the Mayor and the Boroughs should: ensure that new development proposals do not pose a threat to the vitality and well-being of smaller and neighbourhood centres which can easily be reached on foot or by bicycle from the surrounding residential area.

## **Climate change mitigation**

**Policy 5.1** sets out the Mayor's strategic goal of achieving an overall 60% reduction in London's carbon dioxide emissions from 1990 levels by 2025. It should say, as should the Transport Strategy (it is a major weakness that it does not, see below), that transport will contribute the same percentage reduction. Ground-based transport accounts for 22% of London's carbon emissions and should be explicitly included in the reduction target.

## **Connecting London**

In **Policy 6.4 Enhancing London's transport connectivity** the final point k 'providing new river crossings' should only be included if qualified with words such as

'where these could not increase overall traffic levels and travel by car'.

The opportunity to base the development of east London on higher densities and public transport rather than road infrastructure should not be squandered. Campaign for Better Transport's report 'Masterplanning Checklist for Sustainable Transport in New Development', sets out the principles of development with reduced car dependency providing numerous good practice examples.<sup>1</sup>

## **Cycling**

**Policy 6.9 Cycling** sets a target of increasing cycling to 5% of journeys by 2026. Despite the Mayor's interest in cycling, the target is un-ambitious. Cycling accounts for 20-30% or more of journeys in several mainland European cities. We agree with the London Cycling Campaign that the target should be 20% by 2025. The cycling policy should also recognise the investment already made in the London Cycle Network + and other cycling infrastructure and build on this.

## **Abandoning traffic reduction targets**

**Policy 6.11 Smoothing traffic flow and tackling congestion** has replaced policy 3C.17 'Tackling congestion and reducing traffic' in the previous London Plan. (Though zero or reduced traffic growth is still a target for a Key Performance Indicator in Table 8.1, this does not have the legal status of a policy). There is no longer a policy to meet traffic reduction targets. Hence the failure of the draft Transport Strategy to reduce carbon emissions from transport or to reduce congestion – see below. The absence of traffic reduction targets will also frustrate the achievement of aims to improve air quality or reduce noise as well as several objectives of Policy 6.11 including improving the quality of pedestrian and cycling routes and public transport and smoothing traffic flow itself.

The central argument of our submission is that challenging targets for traffic reduction should be reinstated in the London Plan and in the Mayor's Transport Strategy.

## **Lower environmental standards for new road projects**

**Policy 6.12** sets out much weaker requirements for new roads than its predecessor Policy 3C.16. It is now proposed that new road schemes should merely have to 'take into account', amongst other things, how a net benefit to London's environment can be provided and conditions for pedestrians, cyclists and others can be improved. Under the previous policy all road schemes 'should' provide a net benefit to London's environment

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<sup>1</sup> 'Masterplanning Checklist for Sustainable Transport in New Development', Campaign for Better Transport 2008. [http://www.bettertransport.org.uk/system/files/Masterplanning\\_Checklist\\_2008.pdf](http://www.bettertransport.org.uk/system/files/Masterplanning_Checklist_2008.pdf)

and improve conditions for pedestrians, cyclists and others. A reason for changing the policy on new road schemes is no doubt to prepare the policy ground for new road crossings of the river which would allow significant increases to road capacity and car-based infrastructure in East London.

The environmental and other standards for new roads should not be relaxed but made more stringent by using the following wording:

- Proposals for new roads must demonstrate how they
- will benefit London's environment in particular by reducing carbon emissions, noise and air pollution
  - improve conditions for pedestrians and cyclists and safety for all
  - not increase traffic levels.

### **More relaxed parking standards**

Policy 6.1, the Strategic Approach mentioned above, requires boroughs to use the maximum parking standards set out in **Table 6.1** of the draft Plan. This is re-iterated in **Policy 6.13 Parking** which goes into more detail on parking policy.

It is suggested in Policy 6.13 section A and section E c that generous parking provision is necessary to promote new development or the regeneration of centres where there are 'issues of vitality and viability'. We do not accept that argument. Firstly a much better approach than relaxing parking standards in outer London is to create common, tighter standards both for outer London and the area outside London. Secondly there is considerable evidence, including research carried out by TfL, suggesting that a high quality public realm and shopping environment for pedestrians is more important than the ability of shoppers to drive past or park close to shops (see The Benefits of Town Centre Pedestrianisation and Public Realm Schemes, TfL 2002)

Parking standards ought to have been made more rigorous since the last London Plan to take account of the greater urgency of tackling climate change but they have either been carried over unchanged or made more permissive. Instead of being reduced, retail and residential parking standards are unchanged.

### **More parking in town centres**

Prompted by the Mayor's Commission for Outer London, Policy 6.13 Ec proposes to allow 'a more flexible approach to the provision of car parking' in town centres because it could help regeneration and vitality. As explained above, this is a contentious claim which should be rejected.

### **More parking in outer London developments**

Policy 6.13 Ed would allow outer London boroughs to apply more generous parking standards to B1 office developments, provided certain conditions are met, in order to compete with local authorities outside London to attract development. One of the conditions is a lack of public transport now and in future, but if this was the case the development would be at odds with Policy 6.1 A c and 6.3 B and should not be approved in any case.

The provision for more generous parking should be withdrawn and Table 6.1 amended accordingly.

### **Freight on Rail**

Increasing the proportion of freight carried by rail should be a strategic aim of the London Plan and should be included in **Policy 6.14 Freight** in order to remove some HGV traffic from London's roads.

### **Public realm**

**Policy 7.5 Public Realm** states that the public realm should be secure and accessible, incorporating the highest quality landscaping, furniture and surfaces. It fails to mention the impact of traffic which many consider to be the main factor influencing the quality of the public realm.

## **Air quality**

Similarly **Policy 7.14 Air Quality** fails to mention the effects of transport or high levels of road traffic in particular.

## **The Key Performance Indicators**

Monitoring the London Plan is to be based on a new set of 24 Key Performance Indicators (KPI) five of which relate to transport (**Table 8.1**). For four of these the Indicator is to “Achieve a reduced reliance on the private car and a more sustainable modal split for journeys” and for one of these the target is to achieve either zero traffic growth (Central and Inner London) or a reduced rate of growth. Given the need to also meet CO<sub>2</sub>, air quality, congestion and other objectives it is perverse that the London Plan does not set an overall and absolute traffic reduction objective, nor does the Transport Strategy contain the policies or proposals to achieve the traffic reduction required by the KPIs.

## **The draft Mayor’s Transport Strategy**

Many of the policies of the Transport Strategy are uncontroversial. For example **Policy No 1**: “The Mayor....will seek to develop London’s transport system in order to accommodate sustainable population and employment growth.”; **Policy 11** “The Mayor... will seek to reduce the need to travel, encourage use of more sustainable modes, less congesting modes of transport...; or **Policy 17**: “The Mayor...will promote healthy travel options such as walking and cycling.”

Many elements of the Strategy are very welcome. For example most of Transport for London’s investment programme has been retained, including Crossrail, Tube modernisation, the modernisation and expansion of London Overground and the expansion of the Docklands Light Railway. The draft Strategy supports improvements to London’s rail network many of which are underway. The recent transformation of the bus network is hailed as an achievement to be protected. There are plans to raise the levels of walking and cycling, to improve access to town centres and to strike a new balance between different users of our streets. We support these elements (though for more detailed comment on some of these areas see below).

However, the draft Strategy is seriously flawed. It is trying to have it both ways. It claims to promote sustainable transport and work towards environmental improvements but at the same time is unwilling to tackle the volume, or the speed, of motor traffic. We have noted that the draft London Plan will abandon the policy of traffic reduction, reduce the environmental requirements for new roads and create more relaxed parking standards. The draft Transport Strategy proposes to add a number of policies and proposals which would also increase motor traffic and fail to optimise the alternatives. As a result the Strategy cannot achieve many of the goals it sets itself.

Our response will firstly set out our main concerns with the draft Strategy.

### **Increasing the capacity of the road network**

**Policy 2**, in favour of ‘sustainable capacity enhancements’ in rail and coach services, also supports increasing the capacity of ‘the strategic road network serving London’. It is unclear whether this refers to roads outside London, within London or both. In any case the effect would be to funnel more car traffic towards London or generate traffic within it, hindering the achievement of sustainable transport and environmental objectives. The words “and the strategic road network serving London” should be removed.

### **Planning for new roads and river crossings**

More relaxed criteria for new roads have been carried over from Policy 6.12 of the draft London Plan into **Proposal 34** of the draft Transport Strategy (we have suggested in our comments on the London Plan how we think these criteria should be changed). At least part of the purpose is to create a sympathetic policy framework for new road crossings of the river. **Proposal 39** endorses new river crossings including a road

link at Silvertown to supplement the Blackwall tunnel, a road crossing at Gallions Reach (at the site of the rejected Thames Gateway Bridge), and additional capacity at the M25 Dartford crossing.

The Strategy's endorsement of new road crossings should be withdrawn. The proposal for a new ferry at Gallions reach should also be opposed as it would create demand for a future road crossing. We would be likely to support policy and proposals for new walking, cycling and public transport crossings of the river.

### **Smoothing traffic flow and creating capacity for cars**

Clarification is still needed on smoothing traffic flow, a policy to which the Mayor attaches considerable importance. In the figure on page 17 smoothing traffic flow is cited as one of the means of providing 'significant additions to capacity in London'. We are aware however that at least one paper elsewhere (eg 'Developing a Smoothing Traffic Flow Strategy' on TfL's smoothing traffic flow discussion website) has said that the purpose is not to increase capacity. The confusion is not removed by **Proposal 30** which approves measures to smooth traffic flow or by Proposal 101 in the section on reducing transport's contribution to climate change which also endorses measures to smooth traffic flow.

We support the principle of smoothing traffic flow provided that provision for cyclists, pedestrians and people with disabilities is genuinely protected and improved. Where measures are intended to make journeys more reliable and not to increase capacity we would not object to them. However the obvious means of smoothing traffic flow is to reduce motor traffic volume (by road user charging for example), to control parking and to prioritise the most efficient modes (in space and energy terms) in the use of scarce road space. Measures to achieve this should be included in Proposal 30.

We note that 20 mph speed limits have been shown to reduce stop/start driving conditions and to reduce carbon emissions from traffic. The Mayor and TfL should indicate strong support for 20 mph limits in Proposal 101.

### **Dismantling the Western Extension of the Congestion Charge Zone**

**Proposal 127** states the Mayor's intention, subject to consultation, of removing the Western Extension after putting in place unspecified measures to mitigate 'negative impacts'. TfL has estimated that this will increase traffic in the WEZ by 30,000 cars on a weekday and it is difficult to see how negative impacts can be avoided. The air quality consequences may be particularly serious. The loss of income to TfL would also be difficult to justify at a time when bus and tube passengers are being required to pay more to help make good a shortfall in TfL's budget.

The proposal should be withdrawn.

### **Opposing road user charging**

**Proposal 129** says that the Mayor may consider road user charging if other measures to meet the Strategy's objectives are deemed insufficient. But the Proposal, and the Strategy itself, are undermined by the Mayor's statements in the GLA that he has no intention of introducing it. It is worth asking what the point is of having a proposal for a measure which the Mayor has no intention of using and to how many other proposals in the draft strategy this applies.

Road user charging is a proven, successful and internationally acclaimed means of reducing motor traffic. Moreover London-wide road user charging offers the prospect of creating substantial revenues to meet London's transport needs. We note that Proposal 129 also states that the Mayor may consider other pricing incentives such as parking charges to manage demand and we strongly support it.

### **Making public transport more expensive**

We are concerned that under **Proposal 119** passengers may be required to pay too great a share of transport investment costs and that fare levels will discourage public transport travel and encourage travel by car.

Other concerns about Proposal 119 and the policy position described in the Fares and Ticketing section include that:

- There is no evidence of a coherent strategy to use fares to regulate demand for public transport in a manner that would complement other measures to influence travel demand. Such a strategy would require policy on how concessionary rates, travelcards, PAYG and zones might shape public transport demand (particularly as the economy grows again and demand and overcrowding at certain times and on certain routes increases)
- There is no recognition of the particular role that the bus plays in outer London or the need to increase public transport use in outer London from its current low base
- The wording of Proposal 119 that 'The Mayor will ensure that fares provide an appropriate and necessary level of financial contribution towards the cost of providing public transport services' is uninformative and unhelpful. Apart from the suggestion that passengers will be expected to pay for a larger part of the cost of public transport, it remains unclear what Mayoral policy is proposed.

We support the Mayor's intention to create a fully integrated fare collection system that covers TfL and National Rail services which is set out in **Proposal 121**.

### **Cutting expenditure on accessible public transport**

**Proposal 40**, to improve the physical accessibility of the transport system, is belied by cuts on expenditure on this item in TfL's Business Plan. This is a major weakness of the draft Strategy. It points again to the need to protect TfL revenues by not making costly concessions to the motorist, for instance by abolishing the WEZ, and to develop new income streams such as road user charging or levies on parking.

Expenditure on improving physical accessibility should be maintained and the Business Plan made consistent with the Transport Strategy. This should be stated in Proposal 40.

### **Cutting bus services**

**Proposals 23-25**, to maintain and develop London's bus services, are misleading in the same way. They suggest cautious expansion of bus services where they deliver value for money but the Business Plan contains cuts in support for bus services. Once again the Proposals should be followed through by the Business Plan.

In general the Strategy does not have enough to say about buses. It neglects the role and potential for the bus in outer London. Proposals should be more detailed and cover such matters as the need for more bus priority and for priority measures which are not suspended in the evenings and weekends when delays in bus services are common. More attention should be given to interchange between buses and buses and rail services.

We do not see the justification for removal of Bendybuses when resources are limited and their replacement often involves putting more vehicles on the road. We agree with the argument that bus tickets and Oyster bus fares should be valid over more than one bus journey over a 90 minute period.

We do not support the development of the new Routemaster at the current time and consider that its development costs would be better spent elsewhere. This section of Proposal 25 relating to the New Bus for London should be deleted.

### Weak planning for future public transport growth

Figures 19-22 of the Strategy show that, despite Tube and rail capacity increases, overcrowding on some parts of the network will be worse in 2031. Some proposals for future increases in public transport capacity, a further upgrade of the Northern Line and a southern extension of the Bakerloo Line for example, are unfunded and appear to have been included in the Strategy with little prior discussion. The Strategy lacks specific proposals for planning the expansion of the public transport network after the completion of the current investment programme. This planning work should be underway now. The Strategy also lacks proposals for substantial new tram or other light rail projects, placing London in a disadvantaged position compared to other major cities.

It would be worth taking a fresh look at the many options that exist between buses and heavy rail or underground (some of which of course already operate in London) to cater for corridors where there is more demand than buses can cope with but the cost of conventional rail systems would be prohibitive. There are other options being used in other cities, such as bus-based rapid transit and various forms of light rail, including some that are appreciably cheaper than Croydon. We would be pleased to take part in a seminar or other event to examine the potential for these intermediate solutions. The Strategy should state that the case for these options will be investigated.

### Planning for car traffic growth

Our central problem with the Transport Strategy is that the net effect of its policies is likely to be an increase in traffic and a considerable lowering of modal split objectives. This is clear from a comparison of the modal split forecast in Figure 1 of the Strategy and that envisaged in Transport 2025 published by TfL in 2006.

	2006 (from the draft Transport Strategy)	2031 (forecast in the draft Transport Strategy)	2025 (forecast in Transport 2025 published by TfL, Nov. 2006)
<b>Mode</b>	<b>Mode share</b>		
Cycling	2%	5%	5%
Walking	24%	25%	22%
Public Transport	32%	34%	41%
Private Motorised Transport	43%	37%	32% (car only)

Compared to Transport 2025, the mode share of private transport has been increased from 32% to 37% of journeys and the mode share of public transport reduced from 41% to 34% of journeys. The population and the economy of London are also forecast to grow, hence the failure of the Strategy to meet the target for reduction in CO<sub>2</sub> emissions or to tackle growth in traffic congestion (see below).

As noted above, traffic reduction has been abandoned as a policy of the London Plan. Without it the Transport Strategy does not offer a coherent approach to tackling CO<sub>2</sub> and other emissions, congestion and noise or to improving the public realm and conditions for walking and cycling.

### Failing to meet the CO<sub>2</sub> reduction target

The London Plan re-states, in Policy 5.1, the Mayoral target for a 60% reduction on 1990 levels in London's carbon dioxide emissions by 2025. Policy 24 of the draft Transport Strategy says only that the Mayor 'will take the necessary steps to deliver the required contribution from ground-based transport'. Ground transport, according to Fig.28 in the Strategy, accounts for a significant 22% of London's CO<sub>2</sub> emissions (of which cars and motorcycles account for 49% and road freight 23%).

The Strategy fails to ensure that transport meets the Mayor's CO<sub>2</sub> reduction target. Figure 58 forecasts a gap of 2 million tons of CO<sub>2</sub> between the target and the Transport Strategy outcome. Targets for traffic reduction should be reinstated to ensure the CO<sub>2</sub> target is met.



To fill the gap will require, according to paragraph 624 of the Transport Strategy more use of electric vehicles, securing mode shift or minimising emissions from ground-based aviation but the Strategy will achieve none of these to the necessary extent (mode shares fig. 1, EVs fig 58 and aviation fig 28).

### **Failing to tackle growing traffic congestion**

Figure 63, as GLA members have noted, shows the failure of the Strategy to tackle congestion. Even with a substantial public transport expansion programme, better management of the road network and an increase in cycling, an increase in congestion of 14% is forecast by 2031.

### **Failing to tackle air and noise pollution from traffic**

Abandoning road traffic reduction goals also hobbles efforts to reduce air and noise pollution.

Air quality is unlikely to meet European Union standards. Present traffic volumes exacerbated by the withdrawal of the 3<sup>rd</sup> phase of the Low Emission Zone and the removal of the Western Extension of the Congestion Charge Zone mean that it will remain unsatisfactory or deteriorate further. Many thousands of premature deaths occur annually as a result of poor air quality.

Traffic reduction must be part of Noise **Proposals 85-87**, Air Quality **Proposals 90-94**

### **Response on other proposals**

The rest of our response provides comments on the policies and proposals in the order and under the headings in which they occur in the draft Strategy.

**Policy 8** to improve connectivity, vitality and facilities for pedestrians and cyclists should apply to all town and local centres and not just metropolitan town centres.

**Policy 9**, which we support, is mainly a matter for the spatial development strategy but should include mention of restraining the provision of parking particularly in view of Policy 11.

**Policy 11.** We strongly support this policy in favour of reducing the need to travel and encouraging more sustainable transport and have made detailed comments on this matter in our response to the draft London Plan. Combinations of planning and transport measures can cut traffic volumes and speed and thereby make the city more liveable while supporting the economy. We must therefore plan for more walking and cycling rather than new roads. The traffic forecasts underpinning some arguments in the draft Transport Strategy are not inevitable.

**Policy 22** in favour of reduced severance, community safety, enhanced urban realm and improved access to jobs and services, whilst particularly necessary in deprived areas, should also apply elsewhere.

### **Proposals to manage and enhance the transport system**

**Proposal 13** to encourage the provision of rail services that meet common standards and improve ambience, amenities and staff availability at stations, should also include station safety and security, access for pedestrians and cyclists and cycle parking at stations and provision for cycles on trains. TfL should support the use of station travel plans.

**Proposal 14.** We support the development of orbital rail services (not just the Overground) and improved interchange between orbital and radial services. Interchange between the rail network and other modes, including cycling particularly, needs urgent improvement.

## **Managing the road network**

It states, in paragraph 357, that ‘the overriding objective is to maximise the efficient use of a scarce resource’. This is an important matter and the Strategy should define what is meant by efficient. We believe that efficiency denotes the economical use of road space and energy and indicates the need to promote the most economical modes: walking, cycling and public transport.

**Proposal 30** also says that the Mayor will ‘maximise the efficiency of the road system’. We strongly support this objective. However the remainder of the Proposal does not say that the Mayor intends to use any of the available means to prioritise the most efficient modes: road user charging, parking controls, rationing road space and allocation of road space to bus priority and facilities for walking and cycling. Clearly the Mayor does not actually intend to maximise the efficiency of the road system at all. This must be corrected.

## **Proposals to encourage more walking and cycling**

We agree with the Mayor’s view that many more journeys should be made on foot and by bicycle and with the view expressed in paragraph 503 of the Transport Strategy that ‘reducing the rate of injury to cyclists is of paramount importance if the number of cyclists is to grow.’ The Strategy should state the Mayor and TfL’s support for two proven measures to increase road safety:

- Introduce 20 mph limits as the default limit on London’s streets and roads and back this up with support for the use of average speed cameras (this would also help smooth traffic flow)
- A change in the law to introduce a presumption of driver responsibility in collisions involving pedestrians or cyclists.

The aims to promote cycling in **Proposals 50–57** are unchallenging. The goal of a 5% modal share by 2026 compares badly with many European towns and cities where the share is already 20-30% or more. We believe the target should be 20% by 2025.

The potential for cycling in Outer London has been neglected and the principle of filtered permeability has been misconstrued in Proposal 53. Filtered permeability should be seen as a means of making travel on foot and by bicycle more convenient than car travel in order to encourage modal switch. These proposals should also include measures for the enforcement of cycle lanes and advance stop lines.

The **Proposals 58–61** on walking should: include an ambitious modal share target; endorse 20 mph speed limits and filtered permeability that gives walking an advantage over driving; and recognise the potential to increase walking in outer London.

## **Improving Road Safety**

The Strategy should include a statement of support for the development and implementation of Intelligent Speed Adaptation which is already being trialled in TfL vehicles.

We re-iterate that there should be proposals to support default 20 mph limits (ensuring that these cover all residential and shopping streets) and a presumption of responsibility for drivers involved in collisions with pedestrians and cyclists.

## **Better Streets**

We applaud the Mayor’s intention of ‘finding a new balance between the different users’ of our streets. But proposals for better streets which do not include measures to reduce traffic dominance (though this may be mentioned in the text) lack credibility. Traffic and parked vehicles are the most intrusive factor on most streets even those built more with a ‘place’ than a ‘movement’ function.

We are supportive of the concept of shared space provided the needs of different users are addressed.

**Proposal 83** should state the intention of removing the gyratories which blight some town centres and other areas and damage local vitality. Removing them would not just benefit cyclists as implied in the text.

The section on Proposals to improve London's environment should include expressions of support for various car-free initiatives including more car-free days, the design and approval of car-free development and making central London a car-free area.

### **Freight**

Road Freight accounts for 23% of London's ground-based carbon emissions and a substantial proportion of traffic and its other environmental impacts. A separate section setting out proposals for improving conditions for freight movements and reducing their number and environmental impact is a serious omission from the Transport Strategy.

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Campaign for Better Transport

Campaign for Better Transport is the leading transport NGO. Our compelling arguments and ideas have won us the support of national decision-makers and local activists, enabling us to secure transport policies and programmes that improve people's lives and reduce environmental impact.

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