

## Camden Council

### Transport Strategy team - comments on a City for All Londoners 2016

#### Consultation Response: March 2017

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Camden welcomes and supports the Mayor's ambitions and vision outlined in the City for All Londoners document. Camden's aspirations align very well with the Mayor's, as documented in our own Camden Plan and Transport Strategy. In particular the Mayor's commitment to reduce inequality, tackle disadvantage and ensure that everyone benefits from the capital's opportunities and success is one that Camden fully endorses. The Mayor's objectives for transport similarly reflect Camden's aspirations to reduce traffic and make London a healthier, safer, cleaner and more attractive place to work, live, visit and do business. Camden's long-standing policies as well as experience in addressing all these challenges means that the borough has an excellent understanding of best practice and is leading the way in many areas. We look forward to working together with the Mayor, the GLA and TfL to help deliver our shared ambitions.

Camden particularly welcomes the focus on enabling more sustainable, active travel choices, and the Mayor's acknowledgement of their contribution to addressing multiple transport challenges, place making, enhancing people's quality of life and London's reputation as a world class city. We also support the Mayor's intention to focus growth around well-connected locations (current and planned) in order to improve accessibility, but also to minimise travel by car. Enabling different uses of the street at different times of the day is something that the Council favours and will be delivered as part of our innovative proposals for the West End Project (WEP). It is recognised that re-timing deliveries will need to be part of this approach to make the most efficient use of space.

We recognise that that the City for All Londoners does not include detailed measures and initiatives, focusing instead on broad objectives, however Camden has some comments which we hope will inform the development of the Mayor's Transport Strategy and help to ensure that the Mayor achieves his aspirations, as outlined below.

#### **General**

The document makes multiple references to the essential role that transport plays in enabling people's access to essential goods, services, opportunities and networks, as well as unlocking growth and supporting regeneration. However, London's current serious problems of deteriorating air quality, congestion and delays, and public transport overcrowding will also be exacerbated by growth, undermining the capital's economic viability unless urgent and bold action is taken. We therefore urge the Mayor to introduce a road user hierarchy to ensure that those transport modes which address these challenges are prioritised, as Camden has done by placing pedestrians, cyclists and public transport at the top of its road user hierarchy, and particularly to ensure that, in this environment of financial constraint, limited resources are focused on those measures that will deliver the greatest benefits. We also recognise that there are 'hard' decisions to be made regarding competing and growing demand for limited space and resources and that balancing these competing demands can be a significant challenge. A road user hierarchy is a useful tool which will help guide decision making and help to ensure the right outcome for London at particular locations.

Camden's experience is that there have been inconsistent messages from TfL with regard to prioritising different road users which have resulted in a trade-off in the different benefits that can be realised, sometimes to the detriment of some road users and achieving greater benefits. A road user hierarchy will also help to ensure a consistent message from TfL, and provide policy support to the London boroughs to help them deliver the Mayor's objectives.

### **Specific comments**

**Growth:** The quality of the public realm also plays an important role in unlocking growth and should be acknowledged; there is a wealth of evidence to demonstrate its role in supporting and sustaining business, revitalising town centres, boosting economic performance and supporting regeneration. Indeed, developers have gone on record to say that environmental enhancements of the public realm are a trigger for new development activity when they are delivered alongside public transport improvements; in particular, they are looking to Camden's West End Project to help realise the regeneration benefits of the new Crossrail services at Tottenham Court Road.

**Transport:** The Council notes the Mayor's intention to reduce traffic and car dependency, which we also welcome, however, there is no indication of how this will be achieved. While it is possible to restrict traffic on specific streets, such as through the proposed Healthy Streets initiative, there is a concern that this simply pushes it onto other streets, including on residential streets, and increases congestion and pollution elsewhere. This has been a barrier to getting support for some transport improvements, particularly for cycling, and will also not necessarily deliver modal shift away from car use.

As well as a road user hierarchy to guide decision making, the Mayor should therefore also review initiatives to restrict inessential car use to address potential impacts of traffic displacement. This potentially could include, for example, expansion of the congestion charge (including capturing the TLRN) or other road pricing mechanisms, and opportunities to reduce car ownership and parking (through the London Plan) such as car free and car capped developments: Camden's car free policies, which have been in place since 1998, have been very effective at managing car ownership and use, particularly in areas of high public transport accessibility levels (PTAL) which offer alternative travel choices. The borough is now moving towards car-free for all new developments for the whole borough as part of its new Local Plan which will need to be coupled with the hours of controlled parking. The innovative approach extends the traditional PTAL assessment to include accessibility to local services and opportunities, rather than focusing solely on accessibility to the public transport network. This includes, for example access to jobs, health and education facilities (ATOS), as well as the availability of a wider range of alternative transport choices such as cycling and car clubs, to determine the need for parking permits. On this basis, almost the whole of the borough has excellent or good accessibility.

The Mayor could also consider promoting a workplace parking levy for existing car parking opportunities as one way of helping to retro-fit car free, and which could generate funds to support transport schemes. However, the impact on small businesses would need to be understood.

The Council also welcomes continued support for the Central London Cycle Grid and Quietways programmes. However, to be successful, continued funding needs to be made available to the boroughs to implement the schemes on our roads. In this regard the Council advises that while Quietways are important to help encourage take up of cycling among less confident groups, high quality routes are still needed on main roads as these are often the most direct, meet cyclists' desire lines and destinations. Many main roads in London also function as high streets but suffer traffic dominance and high pollution levels which deter

visitors and undermine their viability; high quality cycle routes on main roads will help to improve the look and feel of the street while offering a highly visible alternative to car traffic which will help encourage modal shift.

Other than Healthy Streets, there is very little mention of walking, particularly for shorter trips. Walking has the potential to help people easily meet the required minimum physical activity levels for health and reduce both car trips and public transport overcrowding. There needs to be more promotion of walking for short trips as a viable alternative to using the underground or bus for those people who are able to do so. Data provided by the GLA (The Health Impacts of Cars, 2015) also shows that 15% of trips taken by car by London residents are under one kilometre (less than 0.6 of a mile). These are journeys that could easily be walked in under 12 minutes.

With regard to road safety, the Mayor demonstrates support for 20mph speed limits in residential areas. However, data shows that, in Camden, collisions are generally higher on main roads, including on the TLRN, and these streets should also benefit from slower speeds where appropriate. Since Camden and Islington led the way with their borough-wide 20mph speed limits, in 2012 and 2013, more London boroughs have introduced, or are considering, borough-wide limits, so many boroughs are already way ahead of current Mayoral thinking with regard to speed restrictions. If a Vision Zero is to be realised, the Mayor needs a bolder approach to speed restrictions, particularly extending them to main roads as well as continued support for speed limits on the TLRN where appropriate, and rolling out TLRN 20mph limits if the current trials prove to be successful.

Partnership working with the police will also be fundamental to a Vision Zero outcome, particularly reducing danger at source, with a focus on enforcing against dangerous driver behaviour. This includes involvement in initiatives such as Operation Close Pass (piloted in the Midlands and also implemented in Camden) where police on bicycles enforce against motorists driving too close, as well as Operation Safeway established as part of the current Road Safety Plan.

Road casualties are not always necessarily linked to speed, but are a result of high levels of pedestrians moving around in traffic dominated streets (for example on Kilburn High Road in Camden). Measures other than speed restrictions are necessary to reduce casualties. Evidence shows that reducing traffic volumes has a significant impact on casualties, and initiatives such as Healthy Streets and other traffic restrictions should therefore be considered on those streets with high footfall and casualties regardless of speed.

The *perception* of road danger can also be a strong deterrent to people walking and cycling, as well as using public space, particularly for older people. Again, this is usually the result of heavy traffic volumes and dominance which may not be dangerous in terms of casualty data, but is none-the-less frightening. Camden's work with older people's groups has demonstrated that, in many cases, older people and those with disabilities chose not to leave the house out of fear for their safety; this undermines their independence and isolates and excludes them from accessing essential goods and social networks. Addressing perceptions, particularly by reducing traffic volumes, and improving the public realm, are essential considerations for reducing inequality.

The vision statement does not mention taxis and private hire vehicles (PHVs): taxis in particular disproportionately contribute to London's poor air quality. While there are plans to upgrade the fleet, it is estimated that, with the current standard for taxi replacement, it could

take more than a decade for the fleet to completely comply with ULEZ standards. On the other hand, providing rapid charge points to support improvements to the taxi fleet, as well as buses and commercial vehicles, will be a challenge in central London where available space - both public highway and private land - is at a premium. The Vision's section on housing refers to using TfL (or other public sector) land to provide essential affordable housing which Camden acknowledges is a priority, however, other appropriate uses, such as off-street rapid charge points and freight consolidation should also be considered.

Camden has a long-standing concern about taxis over-ranking, particularly around stations, and engine idling. Camden would like to see either a re-configuration of the ranks or taxi marshalling as standard, as well as greater powers to enforce against engine idling; this would help to ensure effective use of the ranks, reduce idling and improve air quality.

Camden's experience is that there is overprovision of taxis at some locations and at some times of the day, for example at main line stations and evidence shows that taxi use is generally very low at 2% mode share. More strategically, Camden also requests the Mayor to investigate options for better management of the taxi fleet. This should include a review of the demand for taxis, and planning and provision of services across the whole central sub-region, rather than looking at individual locations, and consideration of a cap on licences. Moreover, in the context of growing demand on the transport network, taxi services need to be realistic with regard to the physical constraints to providing more ranks.

We note that PHVs have increased significantly in London in recent years, in response to a more convenient 'on-demand' economy which is likely to continue. More effective management of this sector is also needed to mitigate its impacts, particularly congestion, demand for kerb-space and road safety, and should similarly include a cap on the number of licenses.

Coaches are also not mentioned in the document: tourism is growing, and the Mayor states his intention to increase the number of hotels in London, particularly in outer London. The Council acknowledges that London is a key tourist destination and tourism contributes significantly to London's economy, including in Camden. However there are also negative impacts of tourism which need to be managed. More hotels in outer London is an important step, however, the majority of coach trips are to key attractions in the centre. The size of coaches has increased in recent years, and the space needed to accommodate multiple, 15 metre long coaches in central London along with the impact on the wider street network should not be underestimated. Alternative travel options, particularly the river, should be promoted.

Coaches also impact on our residential streets, both as a result of routing through some sensitive areas, as well as using residential car parking for dropping off and picking up. While Camden accepts the importance of growth in the borough, its impacts on residents has been acute in recent years, and the impact of coaches on residents' amenity has been highlighted as a particular and growing concern. Disturbance from noise is another issue. We understand that London Councils is currently reviewing the London Lorry Control (LCC) scheme which looks at out-of-hours routings which Camden will contribute to, but coaches need to be part of the scheme. While the Mayor also wants to consider out-of-hours deliveries these need to be managed for similar reasons. Please note that this is the correct way to refer to overnight deliveries.

The vision does not mention the splitting of the northern line, a proposal for which has been in development for over a decade. It is estimated that a split offers an opportunity to significantly increase capacity on this line – up from 22 to 32 trains an hour in the peak. This proposal will require significant upgrades to Camden Town station to provide an interchange. A new station entrance is already being planned but it is unclear whether these proposals are part of the longer-term ambitions for the northern line or whether they are future-proofed for these changes. We therefore request an early discussion on the long-term plans for the northern line to understand how they fit with current planned works, how they will be delivered and the impacts on Camden.

Transport and the way we travel impact on every facet of daily life; realising the opportunities that transport brings while minimising its negative impacts underpin London's success and the potential for truly making it a city for all. A business as usual approach will not be sufficient to make the capital fit for the 21<sup>st</sup> century. A bold approach is needed to transform the city, and we are pleased that the Mayor is prepared to make hard decisions in the interests of all and the City's future. Camden has been at the forefront of transport innovation in London, and is recognised for its progressive approach, all of which have informed this response. We hope that the Mayor will consider Camden's input as a good starting point to achieving his vision, as well as continued partnership working going forward. We wish the Mayor every success in the coming years.