



Local Plans Sub (Planning and Transportation) Committee

Date: WEDNESDAY, 6 MARCH 2019
Time: 10.00 am
Venue: COMMITTEE ROOMS – GUILDHALL, EC2P 2EJ

Members: Christopher Hayward (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Randall Anderson
Mark Bostock
Deputy Keith Bottomley
Marianne Fredericks
Alderman Gregory Jones QC
Dhruv Patel OBE

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Lunch will be served in the Guildhall Club at 1.00pm
NB: Part of this meeting could be the subject of audio visual recording

John Barradell
Town Clerk and Chief Executive

AGENDA

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To agree the public minutes and summary of the meeting held on 9 October 2018.

For Decision
(Pages 1 - 10)

4. **UPDATE ON THE LOCAL PLAN CONSULTATION**

The Director of the Department of the Built Environment to be heard.

For Information

5. **TRANSPORT STRATEGY – UPDATE POST-CONSULTATION**

Report of the Director of the Department of the Built Environment.

For Decision
(Pages 11 - 122)

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITEE**

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

8. **EXCLUSION OF THE PUBLIC**

MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

9. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 9 October 2018.

For Decision
(Pages 123 - 124)

10. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

LOCAL PLANS SUB (PLANNING AND TRANSPORTATION) COMMITTEE

Tuesday, 9 October 2018

Minutes of the meeting of the Local Plans Sub (Planning and Transportation)
Committee held at Committee Rooms - Committee Rooms on Tuesday, 9 October
2018 at 2.00 pm

Present

Members:

Christopher Hayward (Chairman)
Deputy Alastair Moss (Deputy Chairman)
Randall Anderson
Mark Bostock
Marianne Fredericks
Dhruv Patel OBE

Officers:

Gemma Stokley	- Town Clerk's Department
Jennifer Ogunleye	- Media Officer
Adrian Roche	- Department of the Built Environment
John Harte	- Department of the Built Environment
Paul Beckett	- Department of the Built Environment
Lisa Russell	- Department of the Built Environment
Peter Shadbolt	- Department of the Built Environment
Iain Simmons	- Department of the Built Environment
Jonathan Blathwayt	- Department of the Built Environment
Bruce McVean	- Department of the Built Environment

1. APOLOGIES

Apologies for absence were received from Deputy Keith Bottomley.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AENDA

There were no declarations.

3. MINUTES

The public minutes and summary of the meeting held on 19 September 2018 were considered and approved as a correct record.

4. CITY OF LONDON LOCAL PLAN REVIEW: PROPOSED DRAFT PLAN

The Sub-Committee considered a report of the Director of the Built Environment drawing attention to the main changes that have been made to the draft policies within the new Local Plan since they were originally considered by Members and seeking approval for the draft Plan in its entirety to go forward to the Grand Committee for consideration later this month.

Members were informed that a key diagram setting out all of the areas referred to within the Plan spatially would accompany the draft submitted to Grand Committee.

The Director of Built Environment proceeded to talk Members through each of the substantive changes as follows:

- **Strengthening of Policy Wording across the Plan**
The Director of the Built Environment reported that the tone of the Plan had been strengthened where appropriate with references to 'should' changed to 'must' and 'could' to 'should' throughout.
- **Alignment with new Corporate Plan**
The draft vision and strategic objectives had been updated to dovetail more effectively with the Corporate Plan. A Member requested that Officers check that any figures quoted within the two Plans were consistent across these and various other relevant policies.
- **Noise and Light Pollution Policy**
Officers reported that, in response to comments previously made by the Sub-Committee, the Noise and Light Pollution Policy had been amended to cover both aspects adequately. In response to a Member who questioned if the Plan was clear enough in terms of what would be taken into account on daylight and sunlight, the Director of the Built Environment reported that this had been worked in to the design policies and highlighted that ideal daylight and sunlight conditions may not be practical in densely-developed city centre locations.
- **Protecting Social, Community and Sporting Facilities in situ**
The Director of Built Environment reported that a cascade approach was to be adopted whereby the start point would be to protect the existing use of such a facility before considering (and giving preference to) a similar use and then only considering alternative uses if this was not possible.

A Member questioned if social rent for some units could be taken in to account. Officers undertook to look further in to the affordability and cost implications of this and to look to reflect this aspiration in so far as possible going forward.
- **Collective Security Measures for Major Developments**
Officers highlighted that the suggested approach to security was a collaborative one with security features for individual buildings being a last approach.
- **On-Site Affordable Housing**
Officers highlighted that the policy emphasised the need for affordable housing to be provided on-site and only exceptionally off-site. This was in line with concerns raised previously by Members and was also

consistent with the message in both the National Planning Policy Framework and London Plan.

A Member referred to the discussion that had taken place around this at the last meeting of the Sub-Committee and the possibility of changing the relevant Supplementary Planning Document (SPD). Officers reported that they had discussed this matter further with colleagues in Community and Children's Services and any changes to the SPD would require public consultation. Members suggested that this process should be instigated sooner rather than later.

A Member requested that points 2. a. and b. of the Housing Policy be put in bold type.

- **Review of existing Residential Areas**

Maps of existing residential areas depicting housing units that were either completed or in the pipeline were tabled for discussion. Members asked that the number of units in each area be clearly highlighted within the map key and that the types of housing were also specified.

In response to questions, Officers highlighted that the 'pink' areas depicted existing residential clusters and that the 'blue' areas were suggestions of other areas which it might be suitable to include subject to the views of Members.

Members were firmly of the view that the areas in which residential development was encouraged should be clearly identified and kept to a minimum.

In response to further questions, the Director of the Built Environment confirmed that residential amenity was already protected within existing policies. The Deputy Chairman asked that it be made explicit that, whilst housing may be outside of these specified zones, residential amenity would still be safeguarded. Officers undertook to verify this.

- **Proposed Phasing Profile to the increase in Office Stock**

Officers reported that it would be made clear in the Policy that this was 'indicative' phasing. Members were informed that the increase of 750,000 square metres referred to for 2016-2021 was largely made up of schemes that were already in the pipeline.

- **Principal Shopping Centres**

Members were informed that the Policy had been amended to encourage more diversity in terms of the retail offer and unit sizes/frontage.

In response to a question, it was reported that an impact assessment would be necessary if several units were amalgamated above a certain floorspace.

- **Specialist Retail Uses and Markets**

Members were informed that these were now treated as separate issues and sub-divided into separate policies.

- **Pedestrian Routes through Buildings and Development Sites**

Officers reported that the Policy now clarified the need to seek to provide new pedestrian routes through buildings and development sites as well as protecting existing routes. This also 'reads across' well to the draft Transport Strategy.

The Deputy Chairman highlighted the need to link both this and the New Development Policy within the Plan. He referred to the point raised by a Member at Grand Committee earlier this week stating that any new development should look to enhance or at least consider how any building becomes part of the public realm. A Member spoke about the possibility of providing developers with a non-exclusive list of things that it was felt would benefit the City and would therefore be in their interests to include (for example, public viewing galleries). Another Member clarified that the point made at Grand Committee had been more specifically around the provision of more publicly accessible ground floor space by developers.

The Deputy Chairman added that consideration should also be given to the metrics of how an assessment impact of a new development might be undertaken and what the expectations around mitigation then were.

Officers undertook to look at how they might strengthen the Policy along these lines.

- **On-Site Servicing Provision**

Greater emphasis had been placed on the need for on-site servicing provision within development schemes.

Members suggested that paragraph 3 of the policy be amended to replace 'Developments should...' with 'Developments *must*'.

The Deputy Chairman spoke on paragraph 2 of the Policy and freight consolidation. He added that this was something that would be a huge change going forward and that developers could therefore be asked, in the interim, to produce Transport Management Plans with reference to this in recognition of the proposed shift towards this approach and to ensure that it remained a live issue. The Chairman concurred with this point and suggested that, going forward, there would be a presumption in favour of consolidation.

A Member suggested that paragraph 1 of the Policy be amended to read 'Applicants are required to consult with the City Corporation *and agree* all matters relating to servicing at an early design concept stage'. She went on to state that, where deliveries on site were necessary, there

should be strict conditions around these and this should be flagged with developers at the very outset.

- **Alignment with the draft Transport Strategy**

Language within the plan would be amended to remove reference to 'super blocks' and replace with reference to healthy planned street areas.

A Member went on to discuss outside spaces more generally, with reference to tables and chairs on public highways and drinking in the street which could prove costly in terms of cleansing and maintenance. She questioned how Officers could look to ensure that developers were not looking to utilise public highways for this purpose going forward. She referred to Westminster City Council who had a policy in terms of tables and chairs and required separate trading licences for these.

The Chairman reiterated this point and questioned how this might be tackled in design terms. He wanted to be clear that any widening of pavements, for example, was for safety purposes and should not be viewed as additional space for developers. The Director of the Built Environment stated that the Local Plan did not deal with public highways but that this led back to previous issues raised around pedestrian permeability. It was suggested that reference to these points might usefully be included within the policy on 'Advertisements'.

Another Member suggested that, if these kinds of issues could be predicted from the use of the Unit, developers could be asked to contribute financially to pavement improvements/cleansing going forward. Officers stated that further views could be sought around this at consultation.

- **Use of the River Thames**

Members were informed that there was now a stronger policy requirement for developers to consider the use of the River Thames for the movement of construction materials and waste and the servicing of development.

The Deputy Chairman suggested that this might be strengthened further still by suggesting that the River also be used more generally for deliveries and the like going forward.

- **Facilities for Public Cycle Parking**

Officers highlighted that paragraph 1 of the Cycle Parking policy had been amended to require developments to provide on-site cycle parking for both occupiers, visitors and, where feasible, the general public.

A Member stated that, in terms of future-proofing such provisions, developers needed to be aware that e-bikes required Wi-Fi signal access and so either Wi-Fi access needed to be improved in certain

areas or additional thought would need to be given to the placement of cycle parking in basements, for example.

Members requested that the wording 'where feasible' be removed from paragraph 1 to strengthen the requirements around public cycle parking.

- **Potential Public Facilities within Tall Buildings**

Members requested that 'must' replace 'should' in paragraph 4 of the Policy.

In response to questions, Officers stated that they were in discussion with the GLA to ensure that this Policy aligned with the London Plan around the need for more publicly accessible spaces.

- **Key Areas of Change**

Maps of the individual key areas were tabled at the meeting.

Pool of London

In response to a question around whether there would be more public toilets provided along the Riverside Walkway, Officers clarified that the onus would be on new developments to provide public access to toilets, water and defibrillators within buildings.

Aldgate and Tower

A Member asked that Portsoken also be included in this Key Area.

Smithfield and Barbican

A Member referred to the 'Smithfield and Barbican Key Area of Change' policy wording and highlighted sensitivity around the suggestion that pedestrian permeability and connectivity through the Barbican Estate might be anywhere other than the existing highwalks. Officers noted this viewpoint but suggested that, at planning stage, it would be their preference to keep options around permeability and connectivity open and to seek specific views around this at consultation.

A Member commented that they felt that Officers had produced a good contextual write up of each Key Area of Change. He went on to state that the area linking Liverpool Street and the Smithfield/Barbican Area would become increasingly important going forward with the introduction of Crossrail and the Cultural Mile, marking an important shift in City Policy, He was therefore keen that reference to this should feature throughout the relevant documents.

Members went on to raise questions around other aspects of the draft Plan. With regard to the 'Air Quality' policy, a Member questioned if it would be better to install the best available technology as opposed to being quite specific around 'biomass or biofuel boilers'.

With regard to the 'Pipe Subways' policy, a Member questioned what thought could be given to the future proofing of infrastructure such as this.

With reference to the 'Housing' policy a Member questioned whether there would be any circumstances whereby a proposal for a scheme offering 100% intermediate housing would be acceptable. Officers reported that this would be considered on a case by case basis and highlighted that there would be new Government requirements around this coming forward. It was generally accepted that if such a proposal were to meet priority need in the City, it would be acceptable despite the 70%/30% reference in paragraph 2.c.

A Member commented that he felt that any reference to area viability was lacking in the Plan. Officers confirmed that the whole Plan would be subject to viability assessment after consultation. The Member asked that this be referred to within the draft Plan.

Officers concluded by stating that the draft Plan would now be submitted to the Planning and Transportation Committee for approval later this month before going out for public consultation, the results of which would be reported to this Sub-Committee in Spring 2019.

RESOLVED – That, Members agree the proposed draft Local Plan set out at Appendix 1 and authorise the Director of the Built Environment to make further minor editorial changes and non-material additions to the draft Plan prior to its consideration by the Planning and Transportation Committee.

5. **DRAFT CITY OF LONDON TRANSPORT STRATEGY**

The Sub-Committee considered a report of the Director of the Built Environment detailing the draft City of London Transport Strategy.

The Chairman questioned the use of the word 'delight' within the visions, aims and outcomes text. Officers reported that this had been well received at initial consultation and it was therefore felt that this was appropriate. Officers reported that reference to 'super blocks' had also been removed from this document following initial comments received and to make it consistent with the Local Plan in this respect.

A Member commented that passing a resolution to shift from 20 to 15mph may prove challenging and he therefore asked for the justification behind this given that it was likely to be one of the Strategy's hottest topics. Officers reported that they wanted this document to make a difference. Evidence showed that the likelihood of fatal collisions was much diminished at 15 versus 20mph.

The Sub-Committee recognised that, whilst this shift would be perceived as radical and had not been adopted elsewhere in London to date, there was no reason that the City should not lead on this initiative, particularly when keeping in mind the Mayor of London's aspirations around 'Vision Zero'. Officers went on to highlight that the City was a totally unique area of London, particularly given the amount of pedestrian footfall in the square mile which was only set to increase in future years.

The Chairman praised the Strategy for being bold and innovative in an attempt to incite real change. In response to questions, Officers reported that, aside from the 15mph proposals, issues around pedestrian priority at certain times, a 50% reduction in peak time deliveries and cycling may also incite debate.

In response to questions, Officers reported that the proposals within the draft document largely aligned with or were slightly ahead of those within the Mayor of London's Transport Strategy. The Deputy Chairman added that there was also full alignment with TfL who liked what the City were doing in this area and seemed to be on board with the proposals.

With regard to commentary on step free access at underground stations, it was reported that the ambition was for all stations to be step free by 2044 which was in line with the Mayor's Strategy.

The Director of the Built Environment reported that this was the City's first Transport Strategy. It was Officers' and Members' genuine belief that it was an exciting, refreshing and useful document where the sum was a coherent, forward thinking plan intended to be greater than any of the individual issues within it. The Deputy Chairman added that, throughout the process of shaping this document, accessibility for all users of the space had been key and the draft Strategy was very inclusive in this regard.

RESOLVED – That, Members of the Local Plan Sub-Committee approve the draft Transport Strategy for final presentation to the Planning and Transportation Committee on 30 October 2018.

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions.

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

There were no additional, urgent items of business for consideration.

8. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item No.

Exempt Paragraph(s)

9-10

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9. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

There were no questions raised in the non-public session.

10. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB-COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

The Chairman informed the Sub-Committee about media interest around the draft Local Plan and Transport Strategy.

The meeting ended at 3.56 pm

Chairman

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Committee(s)	Dated:
Local Plans Sub (Planning &Transportation) Committee	6 March 2019
Subject: Transport Strategy – update post-consultation	Public
Report of: Carolyn Dwyer – Department of the Built Environment	For decision
Report author: Bruce McVean – Department of the Built Environment	

Summary

This report provides an update following consultation on the draft Transport Strategy. Almost 2,900 individual responses and 6,900 comments were received through the consultation website, with a further 70 submissions by email. Over 60 organisations also responded to the consultation.

The majority of respondents supported the draft proposals and no significant changes to the Transport Strategy are proposed. The response to concerns and suggestions raised during the consultation will be set out in the Phase 3 Engagement Report.

The engagement report is currently being completed, but Members are asked to approve the update to the ten key proposals (Appendix 3) and response to the key issues raised during the consultation:

- Concerns over congestion and air quality impacts of delivering the Strategy
- Concerns over access impacts of delivering the Strategy
- Requests to increase the pace of delivery
- The treatment of taxis in the Strategy
- The treatment of motorcycles and mopeds in the Strategy
- Suggested removal of the Cycle Superhighway on Upper and Lower Thames Street

Recommendation(s)

Members are asked to:

- Approve, subject to the incorporation of any comments, the response to the key issues outlined in paragraphs 18 to 47
- Approve, subject to the incorporation of any comments, the updates to the key proposals (shown as tracked changes in Appendix 3)

Main Report

Background

1. Over the last 12 months the City of London Corporation has developed and consulted on its first ever long-term Transport Strategy. The Transport Strategy is currently being finalised following consultation and is expected to be adopted in the Spring.
2. The Strategy sets out the City Corporation's approach to investing in and managing the City's streets over the next 25-years and aspirations for improved transport connections.
3. Delivering the Strategy will help facilitate the forecast growth of the City and accommodate the increased numbers of people travelling to and around the Square Mile. It will improve the experience of spending time on the City's streets with the aim of ensuring the Square Mile remains a healthy, attractive and easy place to live, work and visit
4. The Transport Strategy will be supported by a series of short-term and regularly updated delivery plans, including the City Corporation's Local Implementation Plan (LIP). The LIP is a statutory document that sets out how the City Corporation will deliver the Mayor of London's Transport Strategy.
5. The development of the Transport Strategy has been informed by extensive engagement with the public and organisations with an interest in transport in the Square Mile. The first phase of engagement, held in February and March 2018, included:
 - **City Streets survey:** Almost 2,000 people accessed this survey which included questions on perceptions of the City's streets, priorities for the use of streets and kerb-side space, and ideas and suggestions for future street and transport improvements.
 - **City Streets exhibition:** A supporting exhibition held at the City Centre on Basinghall Street.
 - **Stakeholder workshops:** 77 representatives from City businesses, transport user groups and other organisations with an interest in transport in the Square Mile attended workshops to share their views on the transport challenges and opportunities.
6. The key themes emerging from this first phase of engagement were that:
 - Motor traffic levels on the City's streets are too high
 - People walking in the Square Mile are not given enough priority or space
 - Conditions for cycling in the Square Mile need to be improved and made safer
 - More greenery and seating should be provided on streets and the quality of the public realm improved
 - Air quality in the Square Mile needs to be urgently improved

- There is potential to use streets more flexibly to accommodate the various demands on them at different times of the day
 - The City's streets are not accessible to all
 - The management of freight needs to be improved
7. A second phase of engagement, in June and July 2018, consulted on the proposed vision, aims and outcomes for this Strategy. Over 500 people and organisations responded to this consultation. The draft vision, aims and outcomes received high levels of support, with each being supported or supported with changes by between 77% and 92% of respondents.
 8. An independently recruited panel of City workers and residents also met three times during the development of the Strategy. This panel, which was facilitated by Populus, provided an opportunity to gain a deeper understanding of residents and workers' transport needs and concerns.
 9. A Strategy Board made up of City business representatives, representatives from the Greater London Authority and TfL, and transport experts, also met three times during the development of the Strategy. This Board provided advice and acted as a sounding board for emerging proposals.

Draft Transport Strategy consultation

10. The draft Transport Strategy was approved for consultation by the Planning and Transportation Committee on 30 October.
11. Consultation ran from 10 November 2018 to 13 January 2019. The consultation was widely promoted, including through Ward newsletters, social media, the Transport Strategy and Active City Network mailing lists, flyers and the City of London website home page.
12. The main consultation activities were:
 - **Consultation website:** A bespoke consultation website allowed people and organisations to indicate their level of support for and comment on all proposals. To maximise the volume of feedback received and cater for all interest levels the website allowed users to tailor the level of detail and respond to by choosing one of the following options:
 - Ten 'key proposals' that are likely to be of most interest and will result in some of the most significant changes
 - Proposals grouped by topic or topics, e.g. transport mode
 - All proposals, organised by outcome
 - **Stakeholder briefings:** 47 representatives from stakeholder organisations attended briefing sessions at the Guildhall Art Gallery on 30 November.
 - **Drop-in sessions:** Eight public drop-in sessions were held over the consultation period in the City Corporation's libraries and in Guildhall reception.

13. Almost 2,900 individual responses and 6,900 comments were received through the consultation website, with a further 70 submissions by email. Over 60 organisations also responded to the consultation.
14. The response to concerns and suggestions raised during the consultation will be set out in the Phase 3 Engagement Report, which is currently being finalised.
15. The headline results from the consultation website are summarised below, with more details provided in Appendix 1:
 - Of all responses received through the website 77% were supportive of the proposal (65% support, 12% somewhat support)
 - Levels of support were similar for people who live in the City, work in the City, travel through the City, and visit the City for business or leisure. This contrasts with professional drivers, who tended not to support proposals
 - People who reported that their mobility is limited a little or a lot were less likely to support proposals. This may be due to concerns over access outlined below
 - 20 organisations used the website to respond to the consultation. The average score across all proposals for these organisational responses was 4.5 – on a scale of 1 (oppose) to 5 (support).
16. 43 organisations provided separate written responses to the consultation (see Appendix 1 for a full list). Of these 21 expressed overall general for the Transport Strategy as well commenting on individual proposals, including the Barbican Association, City Property Association, Landsec and St Paul's Cathedral School.
17. Only four organisations expressed general opposition – Alliance of British Drivers, Brewery Logistics Group, Road Haulage Association and Motorcycle Action Group.

Response to key issues

18. The high levels of support for the draft Transport Strategy proposals mean that no significant changes will be required. However, while the overall response to the draft Transport Strategy was positive there were several key issues raised that cut across proposals and require a comprehensive response.

Concerns over congestion and air quality impacts of delivering the Strategy

19. Concerns that Transport Strategy deliverables will lead to an increase in congestion and emissions were raised across a number of proposals, particularly those relating to:
 - Providing greater priority for people walking (Proposal 2)
 - Providing protected space for people cycling (Proposal 24)
 - Implementing a 15mph speed limit (Proposal 20)
20. No changes to the Strategy are proposed as a result of these concerns. It is recognised that reallocating space to walking, cycling and public realm will reduce capacity for motor vehicles. However, proposals to reallocate space from motor

vehicles need to be considered alongside proposals to reduce motor traffic and improve air quality. Collectively the Strategy proposals are not expected to increase congestion and will result in reduced emissions from motor vehicles.

21. The traffic and air quality impacts of individual interventions and projects, including the potential introduction of a 15mph speed limit, will also be assessed and addressed during project development.
22. Proposals 11 and 38 seek to reduce general motor traffic and the number of freight vehicles. These reductions will help prevent unreasonable impacts on remaining essential journeys as a result of reallocating street space. Several other proposals will also support efforts to reduce motor traffic, including support for improved public transport and cycling connections to the City.
23. The Strategy includes ambitious proposals to reduce emissions from motor vehicles. These will be in addition to improvements that will be delivered by the Ultra-Low Emission Zone from April 2019. The intended shift to more electric vehicles will mean that slower speeds do not result in increased emissions, and smoother flows at lower speeds should mean less impact from braking and accelerating.

Concerns over access impacts of delivering the Strategy

24. Approximately 80 people and a number of organisations, including the City of London Access Group, the Barbican Association, Royal Mail and the Brewery Logistics Group, raised concerns that measures to deliver pedestrian priority would adversely impact on access for people with disabilities and for deliveries.
25. The principle of pedestrian priority streets, as set out in Proposal 2, is to provide priority to people walking while still allowing access for essential vehicles, including delivery and servicing vehicles with a destination in the Square Mile. This approach recognises the need to maintain some access by motor vehicles to most addresses in the City.
26. Proposal 2 will be updated to make clearer the intention to maintain appropriate vehicle access and to highlight that access requirements will be assessed as part of the project development process. Vehicle access requirements will also be considered during the development of the City of London Street Accessibility Standard (COLSAS, Proposal 16).
27. The work to develop the COLSAS will explore how to best balance the varied access and transport needs of disabled people. Most disabled people do not have limited mobility or are able to walk short distances or use a wheelchair, mobility scooter or cycle. This group may benefit from access restrictions and reallocation of street space to walking and cycling, while those with such limited mobility that they require door-to-door transport and assistance might potentially disbenefit.

Requests to increase the pace of delivery

28. Requests to increase the pace of delivery were made across a range of proposals, particularly in relation to milestones for:
 - Delivering the cycle network (Proposal 24)

- Reducing motor traffic (Proposal 11)
 - Improving air quality (Proposal 29)
29. The milestones in the Transport Strategy reflect the relatively long-term nature of delivering significant changes to the City's street, including the requirement for extensive stakeholder engagement as projects are developed.
30. The Strategy will be updated to indicate that we will seek to deliver as quickly as possible and that milestones represent the latest date by which we expect proposals and projects to be fully delivered. We will also indicate the expected year of delivery for projects and proposals that are due to be delivered by 2022.
31. It is difficult to commit to faster timescales for proposals to proactively reduce motor traffic (Proposal 11) and introduce additional emissions related restrictions (Proposal 29) as these are largely dependent on actions by the Mayor of London and TfL. The milestone for delivering the second phase of the cycle network (Proposal 24), currently 2044, will be brought forward to 2035.

The treatment of taxis in the Strategy

32. Responses from taxi trade representatives along with some organisational and individual comments requested that taxis be treated the same as buses, particularly when any access restrictions are introduced. Comments also included suggestions that taxis should be exempt from measures to reduce motor traffic. The City of London Access Group and others highlighted the role of taxis in providing a fully accessible door-to-door service.
33. Comments were also received that suggested taxis should not be treated any differently to private cars and private hire vehicles, and that measures to actively reduce the number of taxis in the City should be introduced.
34. No changes to the Strategy are proposed in response to these comments, which are most relevant to Proposals 2, 11, and 12.
35. It is recognised that there will always be a need for taxis in the Square Mile, but it is not considered appropriate for taxis be exempt from consideration in terms of traffic reduction. Reductions in all types of motor traffic will be required to meet the Strategy's traffic reduction target, and taxis currently make up approximately 21% of motor vehicles on the Square Mile's streets.
36. The exemption of taxis from any future access restrictions is best addressed on a case-by-case basis during project development. This will include the consideration of accessibility requirements and take account of the fact that the Transport Strategy defines taxis being used by people with access needs as essential traffic.

The treatment of motorcycles and mopeds in the Strategy

37. The Motorcycle Action Group, Motorcycle Industry Association, British Motorcyclists Federation and almost 250 individuals suggested the Transport Strategy should seek to encourage greater use of motorcycles and mopeds. Suggestions included providing more free on-street parking and giving motorcycles and mopeds equal priority to cycles.

38. Respondents also suggested that motorcycles and mopeds should be exempt from future access restrictions and road user charges, including emissions related charges.
39. No changes to the Strategy are proposed in response to these comments, which are most relevant to Proposals 2, 11, 12, 14 and 29. However, further analysis on the current use and potential role for motorcycles and mopeds, both private and commercial, will be undertaken before implementing any proposals.
40. It is recognised that there is a role for motorcycles and mopeds for certain journeys where a non-motorised or public transport alternative is not available. In these instances, travelling by motorcycle or moped is likely to have a lower impact on congestion and air pollution than using a private car. However, motorcycles and mopeds do still emit NOx and particulate matter and contribute to noise pollution.
41. There is likely to be limited potential for modal shift to motorcycles and mopeds from private cars, taxis and private hire vehicles. Actively encouraging travel by motorcycles and mopeds may also result in some shift away from walking, cycling and public transport (93% of commuter travel).
42. The Transport Strategy currently takes a relatively neutral position on motorcycles and mopeds. It does not seek to further encourage or actively discourage their use beyond overall measures to reduce motor traffic. No changes to this approach are proposed, including maintaining existing proposals on reviewing the potential for reallocation of on-street parking to space for walking, cycling and public realm.
43. As with taxi access, exemptions from restrictions are best decided on a case-by-case basis during project development. Any exclusions to future road user or emissions-based charges will be considered during development of more detailed policy or future schemes.

Suggested removal of the Cycle Superhighway on Upper and Lower Thames Street

44. Over 500 people submitted template responses via the Unblock the Embankment website suggesting that the existing Cycle Superhighway on Upper and Lower Thames Street should be replaced by the Aldgate to Blackfriars route proposed in the Transport Strategy (Proposal 24). The template mirrored the formal Unblock the Embankment response. Members of the Unblock the Embankment campaign are the Licensed Taxi Drivers Association, Royal Jersey Laundry, Canary Wharf Group, the Confederation of Passenger Transport and the British Motorcycle Federation.
45. Proposal 24 outlines the proposed core cycle network for the Square Mile, which builds on the existing cycle network in central London and aims to create a network of safe, attractive, and accessible cycle routes across the City. It also allows the existing east-west Cycle Superhighway to continue to provide a relatively quick route through the City while reducing potential conflicts with the very high volumes of people walking in the Square Mile.
46. Proposal 24 was supported by 78% of people who responded through our consultation website. It was also supported fully by 12 organisations and in part by 6 more; including Federation of Small Businesses, City Property Association and

St Paul's Cathedral School. 1,500 people also submitted template responses prepared by the Square Mile Cycling campaign, which expressed support for an enhanced Aldgate to Blackfriars route in addition to the existing Cycle Superhighway.

47. No changes to Proposal 24 are proposed in response to the Unblock the Embankment request.

Responses and updates to key proposals

48. Levels of support for the key proposals are summarised in the table below, with further details provided in Appendix 1. These scores were generated through the consultation website, with respondents indicating their level support on a scale of 1 (oppose) to 5 (support).

Proposal	Score
Proposal 2: Put the needs of people walking first when designing and managing our streets	4.1
Proposal 11: Take a proactive approach to reducing motor traffic	3.9
Proposal 14: Make the best and most efficient use of the kerbside and car parks	3.9
Proposal 17: Keep pavements free of obstructions	4.0
Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero	4.0
Proposal 24: Apply a minimum cycling level of service to all streets	4.2
Proposal 29: Support and champion a central London Zero Emission Zone	4.1
Proposal 38: Reduce the number of freight vehicles in the Square Mile	4.4
Proposal 41: Reduce the impact of construction and streetworks	4.4
Proposal 43: Establish a Future Transport Programme	4.2

49. The major comments on and updates to the key proposal are summarised below. Further details are provided in Appendix 2 and Appendix 3.

Proposal 2: Put the needs of people walking first when designing and managing our streets

50. The average score for this proposal was 4.1 out of 5. Of those who provided comments, 355 people and 25 organisations supported the proposal and made no suggestions for changes, including the City Property Association, Cross River Partnership and the Barbican Association. 84 people and three organisations (Alliance of British Drivers, Brewery Logistics Group and Smithfield Market Tenants' Association) opposed the proposal without making any suggestions for change.
51. The majority of comments expressed support for the proposal because of the benefits it would bring, such as helping to alleviate crowded pavements, improve the Square Mile as a place to live and work, and help encourage people to walk. A number of comments supported the proposal but asked for it to be more ambitious in its pace of delivery or in the number of pedestrian priority streets.
52. The main areas of concern from individuals and organisations were the potential impact on vehicle access (particularly for disabled people who require the use of motor vehicles) and whether the proposal would increase congestion, which in turn would impact air quality.
53. The proposal will be updated to make clearer the intention to maintain appropriate vehicle access and to highlight that access requirements will be assessed as part of the project development process.

Proposal 11: Take a proactive approach to reducing motor traffic

54. The average score for this proposal was 3.9 out of 5. Of those who provided comments, 222 people and 19 organisations supported the proposal and made no suggestions for changes, including Transport for London, Sustrans and Centre for London. 42 people and the Alliance of British Drivers and Unblock the Embankment opposed the proposal without making any suggestions for change. The 500 template responses sent via the Unblock the Embankment website raised concerns about increased traffic on the A3211 as a result of implementing this proposal.
55. Respondents expressed support for the proposal because it would help to reduce air and noise pollution, make the City a more pleasant place and improve road safety. A significant number of people supported the proposal but requested it went further by either delivering at a faster pace, reducing the number of certain types of vehicle or removing on-street parking spaces.
56. A significant number of comments were received suggesting the proposal should seek to encourage greater use of motorcycles and mopeds. Concerns over the impact of the proposal on vehicle access were also raised.
57. Reflecting the requests for a more ambitious target, the aim of a 25% reduction in motor traffic by 2030 will be updated to a minimum aspiration. However, the rate at which traffic volumes are reduced is largely dependent on actions by the Mayor of London and Transport for London and it is difficult to commit faster timescales. As noted above, the proposal will not be updated to actively encourage travel by

powered two wheelers, but further analysis will be undertaken to understand their use and potential as part of proposal 14.

Proposal 14: Make the best and most efficient use of the kerbside and car parks

- 58. The average score for this proposal was 3.9 out of 5. Of those who provided comments, 148 people and 18 organisations supported the proposal and made no suggestions for changes, including Transport for London, Centre for London and Cross River Partnership. 45 people and four organisations opposed the proposal without making any suggestions for change, including the British Motorcyclists Federation and Motorcycle Action Group.
- 59. Respondents expressed support for the proposal because too much space is currently given to vehicles and on-street parking spaces is a poor use of public space. Some respondents supported the proposal but asked it to go further by removing more or all of on-street parking or to deliver the proposal faster.
- 60. A number of respondents opposed the proposal because of a specific measure. Most of the opposition was related to powered two wheelers; either regarding the potential reductions in on-street parking or the potential introduction of variable charging by size and emissions. A number of organisations also expressed opposition to the potential reduction in the maximum loading period for freight vehicles.
- 61. The proposal will be updated to make it clearer that no changes will be made to use of the kerbside without adequate assessment of current use and potential impact and engagement with users and stakeholders.

Proposal 17: Keep pavements free of obstructions

- 62. The average score for this proposal was 4.0 out of 5. Of those who provided comments, 156 people and 19 organisations supported the proposal and made no suggestions for changes, including Transport for London, Sustrans and the City of London Accessibility Group. 34 people opposed the proposal without making any suggestions for change.
- 63. Support for the proposal referred to provision of designated parking spaces for dockless cycles and removing A-boards and other street clutter.
- 64. A significant number of comments were concerned that proposals to manage outside drinking and seating would prevent people spending time outdoors and result in a 'sterile' environment. Other concerns included undermining dockless cycle schemes or the impact of removing A boards on small businesses.
- 65. No changes are proposed. In line with existing licensing policies this proposals seeks to manage rather than ban or unduly restrict outdoor drinking and seating. We recognise that eating and drinking outside, especially in summer months, is an important part of the City's culture. However in places this can result in access or safety issues due to pavement crowding.

Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

66. The average score for this proposal was 4.0 out of 5. Of those who provided comments, 156 people and 13 organisations supported the proposal and made no suggestions for changes, including Transport for London, City Property Association and Brake. 17 people opposed the proposal without making any suggestions for change, but 5 organisations opposed and suggested changes, including the Alliance of British Drivers, the Brewery Logistics Group and the Motorcycle Action Group.
67. Overall, proposal 20 received strong support from both individuals and organisations. Comments referred to supporting a 15mph speed limit, encouraging safer road user behaviours, need for strong enforcement of speed, vehicles and poor behaviours and Intelligent Speed Adaption (ISA).
68. Most comments from individuals and organisations opposing the proposal related to the 15mph speed limit – noting that this was too slow a speed and may result in increased congestion and vehicle emissions.
69. While we understand that there are concerns relating to the impact and suitability of a 15mph speed limit, safer speeds is a core component of the safe systems approach to reducing road danger. We do not expect the 15mph speed limit to have a significant impact on air quality or congestion, particularly as it will be delivered alongside measures to reduce vehicle numbers and emissions. All impacts of the limit, including increased journey times and specific impacts to motorcyclists will be considered as part of scheme development.

Proposal 24: Apply a minimum cycling level of service to all streets

70. The average score for this proposal was 4.2 out of 5. Of those who provided comments, 177 people and 11 organisations supported the proposal and made no suggestions for changes, including the City Property Association, London Living Streets, and Transport for London. 32 people and the Alliance of British Drivers and Motorcycle Action Group opposed the proposal without making any suggestions for change, including
71. Support for this proposal covered many themes, including the introduction of a minimum cycling level of service on all streets, improving safety for people cycling through the development of the core cycling network, enabling more non-standard cycling in the City, and supporting. There was also significant support for accelerating the delivery of the core cycling network.
72. Opposition to this proposal was focused on the reallocation of street space from vehicles to people cycling, perceived negative behaviours of people cycling, conflicts between street users arising from shared space and contraflow cycling lanes, the lack of inclusion of powered two wheelers in our plans, and general opposition towards more people cycling in the City.
73. Key changes to this proposal include accelerating the delivery of the core cycling network overall from 2044 to 2035 and delivery of our first new section of the core cycling network (Blackfriars to Bank Junction) from by 2025. Other minor changes have been made to the proposal for clarification or to points of detail.

Proposal 29: Support and champion a central London Zero Emission Zone

74. The average score for this proposal was 4.1 out of 5. Of those who provided comments, 275 people and 25 organisations supported the proposal and made no suggestions for changes, including Barbican Association, City Property Association, Living Streets and Transport for London. 56 people opposed the proposal without making any suggestions for change. The Motorcycle Action Group (MAG), Alliance of British Drivers (ABD), Smithfield Market Tenants' Association opposed the proposal and made suggestions for change.
75. There was a high level of support for this proposal with many people asking for it to go further than the two local Zero Emission Zones (ZEZ) proposed for the City Cluster and Barbican and Golden Lane.
76. Concerns expressed were predominantly around the need to manage implementation timescales for any ZEZ with a realistic approach to access issues for residents and restrictions that reflect the availability of zero emission capable vehicles, particularly for freight.
77. No changes are proposed as a result of consultation comments. The need to consider phasing for vehicle class/type and possible exemptions for certain users is reflected in the proposal and will be considered during the development of local ZEZs. Residents, businesses, the freight industry and other street users will be engaged as part of this process.

Proposal 38: Reduce the number of freight vehicles in the Square Mile

78. The average score for this proposal was 4.4 out of 5. Of those who provided comments, 129 people and 15 organisations supported the proposal and made no suggestions for changes. 34 people and the Alliance of British Drivers, La Fromagerie and the Smithfield Market Tenant's Association opposed the proposal without making any suggestions for change. The 500 template responses sent via the Unblock the Embankment website raised concerns about increased traffic on the A3211 as a result of implementing this proposal.
79. Proposal 38 received very strong support from individuals and good support from organisations, including supportive responses from the City Property Association, Landsec and the Chancery Lane Association.
80. Opposition to this proposal was predominantly from organisations concerned that that not all types of delivery are suitable for retiming or consolidation.
81. The proposal will be updated to clarify that the proposed actions do not uniformly apply to all types of deliveries.

Proposal 41: Reduce the impact of construction and streetworks

82. The average score for this proposal was 4.4 out of 5. Of those who provided comments, 223 people and 25 organisations supported the proposal and made no suggestions for changes, including Federation of Small Businesses, Living Streets, City of London Access Group. 6 people and none of the organisations opposed the proposal without making any suggestions for change.

83. Comments included request for higher penalties for overrunning works and for better notification of diversion routes, including for people walking, cycling and using buses.
84. Commenters also expressed highlighted the need to protect residents. Some comments were made regarding the hierarchy for traffic management plans, particularly with respect to taxis and freight, which have been addressed in changes to the proposal.

Proposal 43: Establish a Future Transport Programme

85. The average score for this proposal was 4.2 out of 5. Of those who provided comments, 67 people and 17 organisations supported the proposal and made no suggestions for changes, including the Society of Motor Manufacturers and Traders, Barbican Association and Tideway, 23 people and the Brewery Logistics Group opposed the proposal without making any suggestions for change.
86. Support for this proposal was broadly related to our proactive approach to planning for and incorporating emerging transport technologies and innovations into the Strategy and the approach we have taken to vet those technologies and innovations, including our list of requirements.
87. Opposition to this proposal was focused on the role of Connected and Autonomous Vehicles (CAVs) and technology more widely in the City and an overall scepticism about whether the City can proactively plan for and integrate innovation into the Strategy.
88. Key changes to this proposal include adding an additional requirement for transport innovators to ensure that needs of disabled people are accommodated for in emerging technologies and for a Future Transport Action Plan to be published in 2020. Other minor changes were made to strengthen the delivery of the programme more generally.

Corporate and Strategic Implications

89. The delivery of the Transport Strategy will support the delivery of the Corporate Plan outcomes 1, 3, 5, 8, 9, 11 and 12. It also indirectly supports the delivery of Corporate Plan outcomes 2 and 4. The relationships between Transport Strategy and Corporate Plan outcomes are mapped in Appendix 4.
90. It will help the City contribute to a flourishing society by:
- Making streets safer and reducing the number of traffic related deaths and serious injuries.
 - Enabling people to walk and cycle and reducing the negative health impacts of transport.
 - Ensuring streets are accessible to all and provide an attractive space for the City's diverse community to come together.

91. A thriving economy will be supported by:

- Enabling the City to continue to grow and accommodating the associated increase in demand for our limited street space.
- Improving the quality of streets and transport connections to help attract talent and investment.
- Helping create a smarter City, that supports and enables innovative transport technology and other mobility solutions.

92. The Strategy will help shape outstanding environments by:

- Advocating for improved local, national and international transport connections.
- Reducing motor traffic levels to enable space to be reallocated to walking, cycling, greenery and public spaces.
- Improving air quality and reducing noise from motor traffic.
- Ensuring streets are well maintained and resilient to natural and man-made threats

Financial implications

93. Delivery of the Transport Strategy will primarily be funded through developer contributions (S106, S278 and CIL) and the On-Street Parking Reserve (OSPR). Funding will also be provided by Transport for London, including the City Corporation's annual LIP allocation.

94. A prioritisation exercise for transport and public realm projects that will be delivered over the next 10 years is currently underway and due to complete in March. This includes capital projects emerging from the Transport Strategy, some of which are already programmed. This exercise will ensure alignment of resources to meet both Corporate Plan and Transport Strategy outcomes. It is being conducted in discussion with the Chamberlain and with support from Corporate Strategy.

95. A costed Delivery Plan outlining the projects that will be delivered or initiated in the first three years of the Strategy will be published alongside the adopted Transport Strategy. The Delivery Plan will include a funding strategy and be updated on an annual basis.

Public sector equality duty

96. Land Use Consultants have been appointed to undertake an independent Integrated Impact Assessment (IIA) for the Transport Strategy. The IIA includes an Equalities and Inclusion Assessment. The assessment of the draft Transport Strategy found that overall the proposals will have positive effects in relation to equality and inclusion.

97. The IIA will be updated to take account of any changes to the final Strategy. The IIA is not expected to change significantly as there will be no substantive changes to the proposals.

98. Equalities and Inclusion Assessments will be undertaken for all relevant delivery projects.

Conclusion

99. The City of London Transport Strategy represents a radical and ambitious approach to tackling the transport challenges and opportunities facing the Square Mile. The delivery of the Transport Strategy will help support the City's growth and ensure the Square Mile remains an attractive place to work, live, learn and visit.

100. The consultation on the draft Transport Strategy indicated a high level of support for proposals from both individuals and organisations. As a result, no significant changes will be made prior to seeking Member approval for adoption.

101. We are now moving at pace to finalise the consultation report and remaining updates to the Transport Strategy, with the aim of seeking adoption in the Spring. This will allow the first delivery projects to be initiated early in the new financial year.

Appendices

Appendix 1: Summary scores from consultation website

Appendix 2: Comment summaries and responses

Appendix 3: Changes to Transport Strategy key proposals

Appendix 4: Corporate Plan outcome mapping

Background Papers

Draft Transport Strategy <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/draft-transport-strategy.pdf>

Phase 1 Engagement report <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/transport-strategy-phase-1-engagement-report.pdf>

Phase 2 Engagement report <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/transport-strategy-phase-two-engagement-report.pdf>

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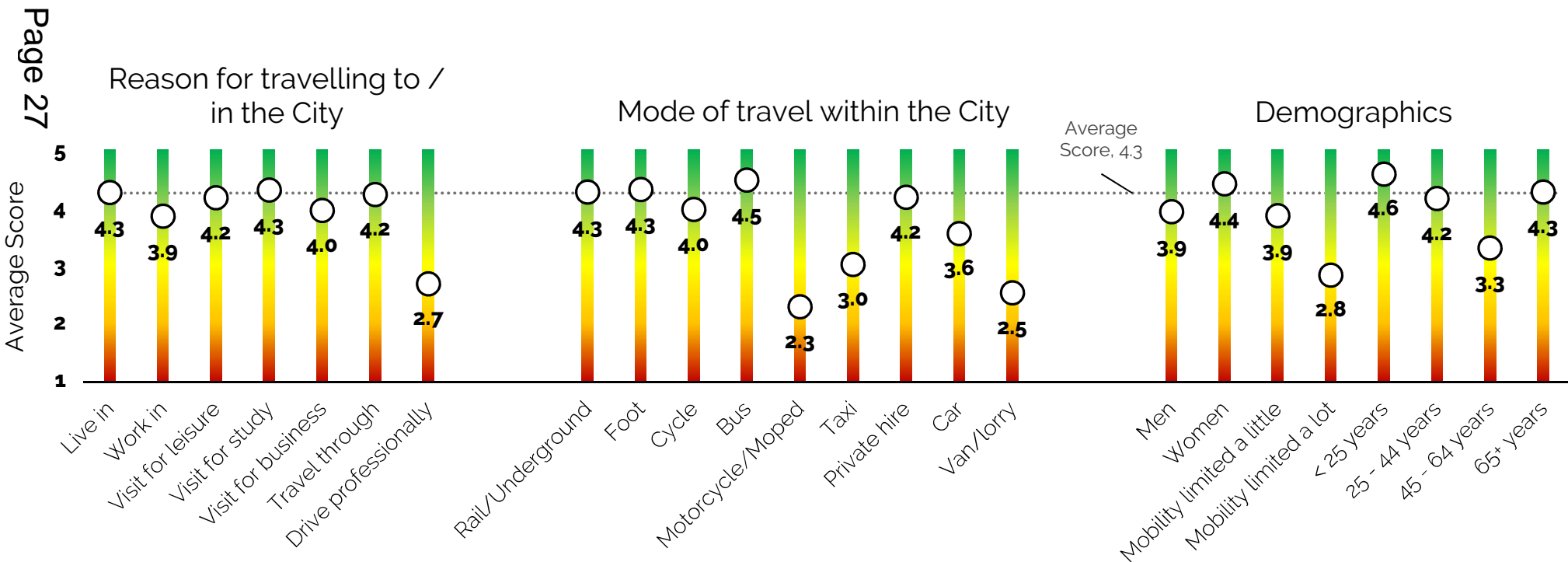
E: bruce.mcvean@cityoflondon.gov.uk

Appendix 1: Summary scores from consultation website and list of organisations providing written responses

Consultation Summary

28,805 scores recieved from 2,888 respondents

4.3 Average

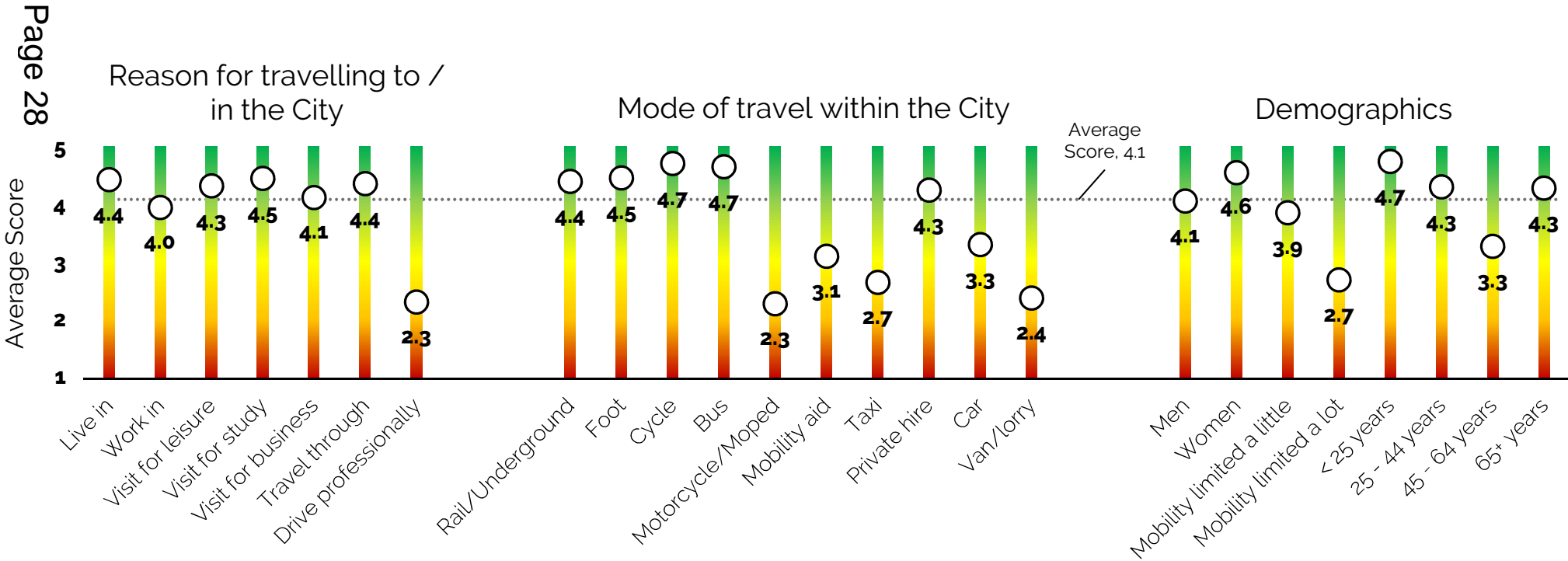


Proposal 2

Put the needs of people walking first when designing and managing our streets.

2356 Responses

4.1 Average

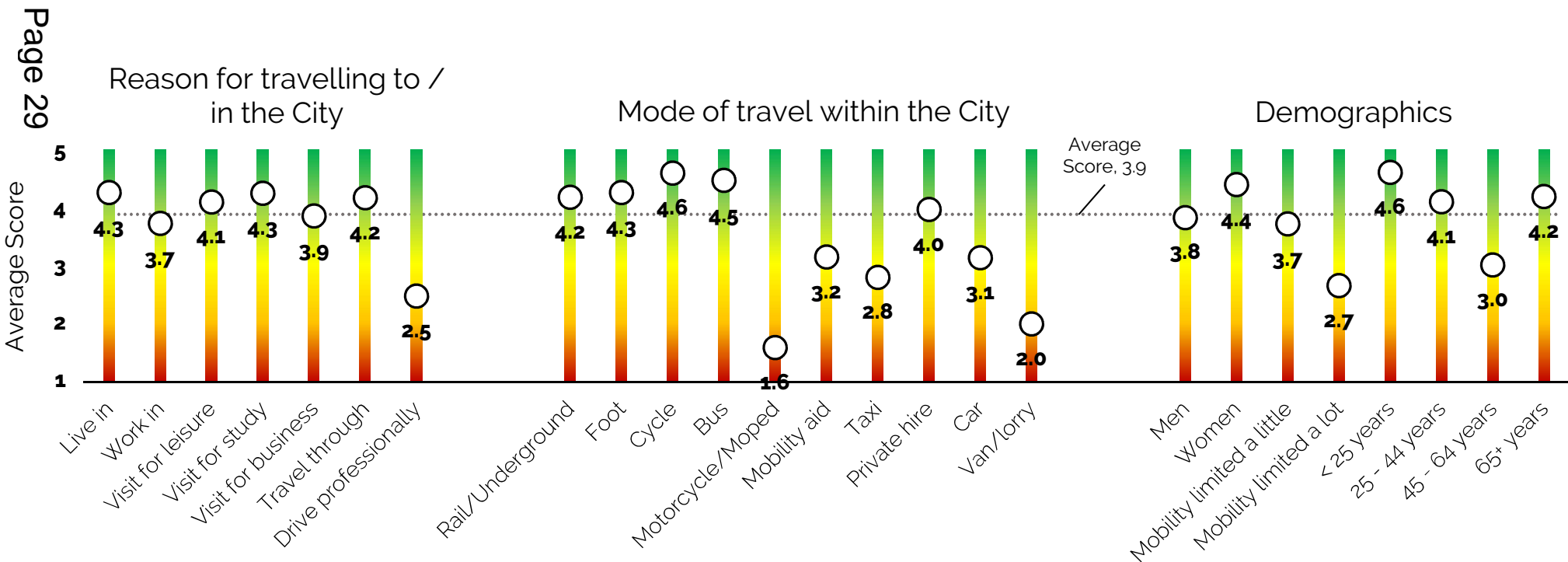


Proposal 11

Take a proactive approach to reducing motor traffic

2257 Responses

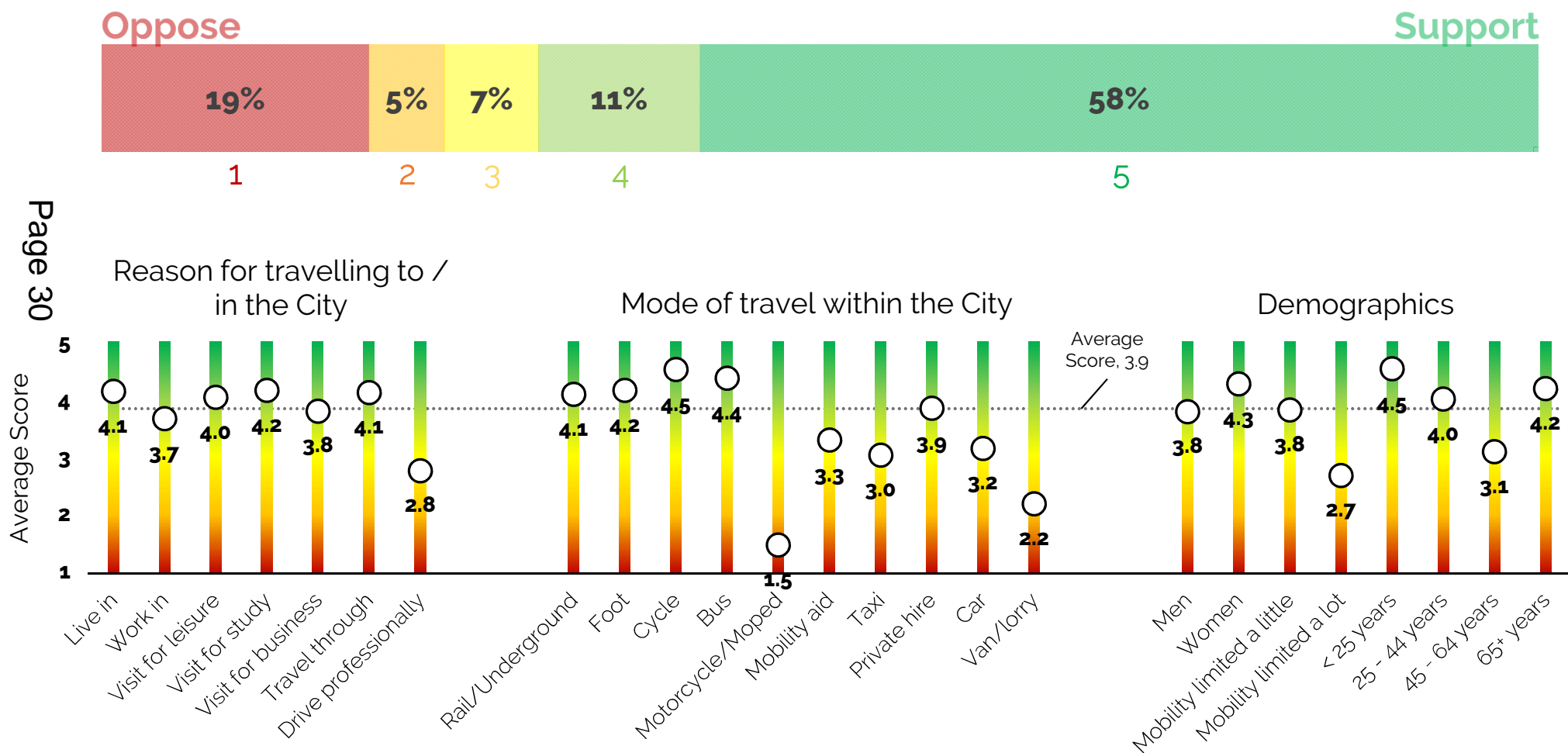
3.9 Average



Proposal 14 Make the best and most efficient use of the kerbside and car parks

2026 Responses

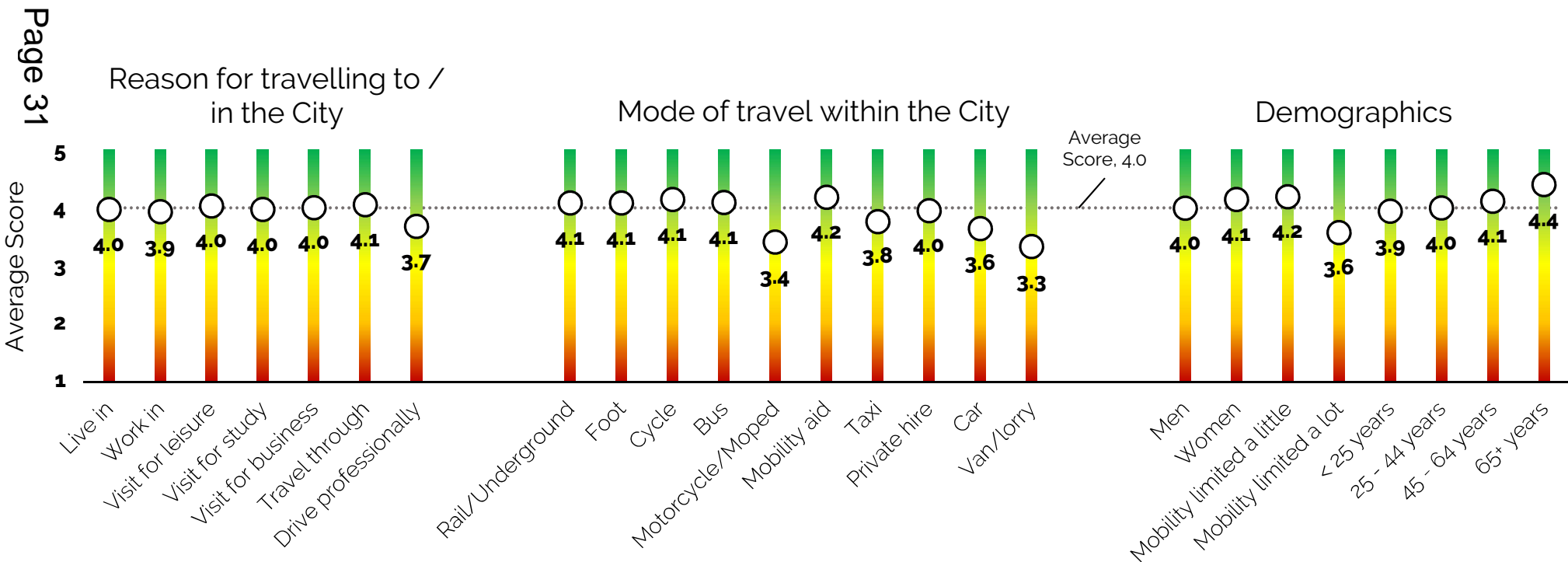
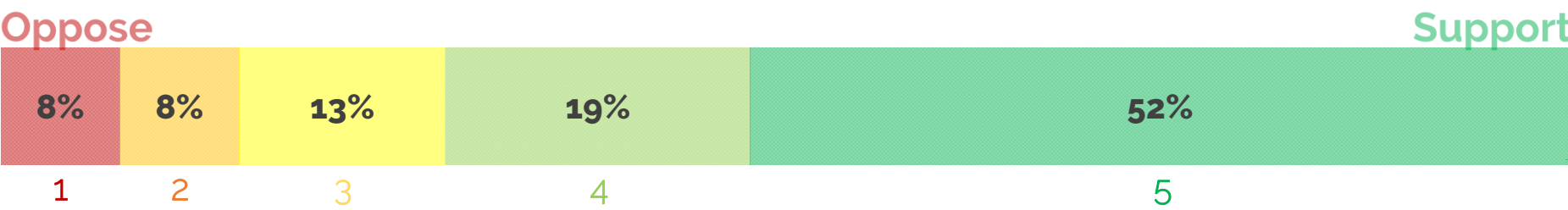
3.9 Average



Proposal 17

Keep pavements free of obstructions

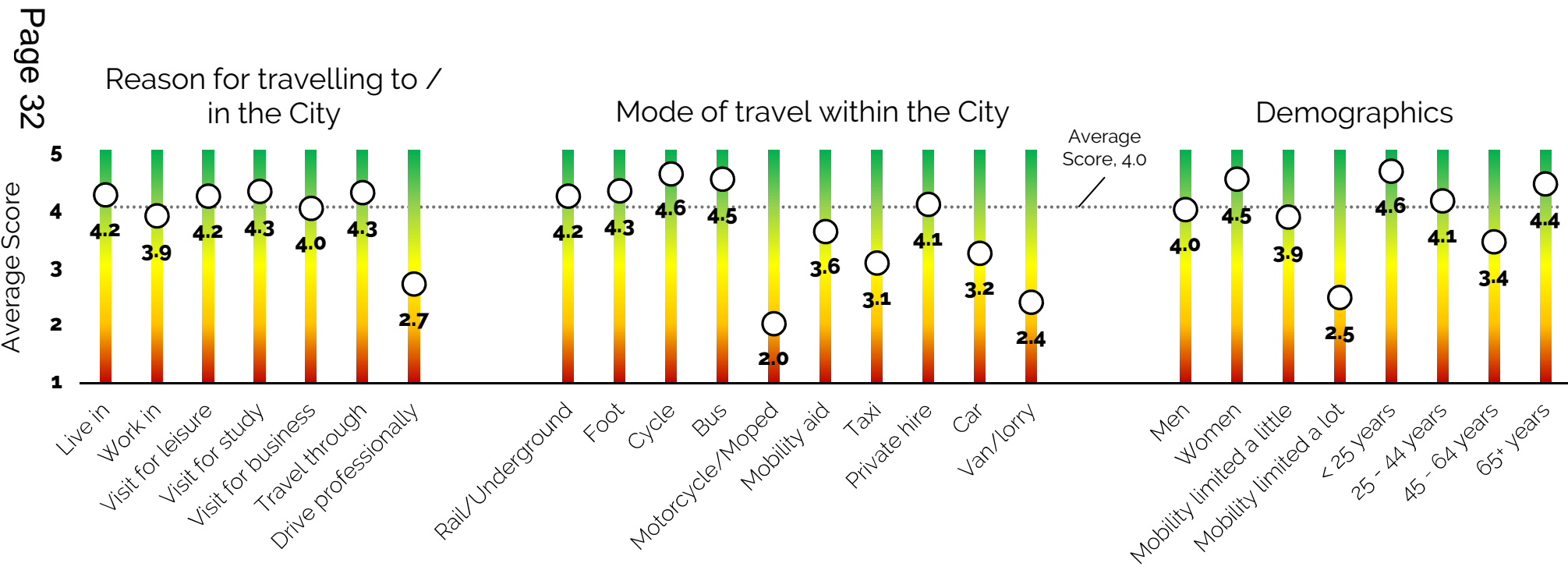
1960 Responses
4.0 Average



Proposal 20 Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

2012 Responses

4.0 Average

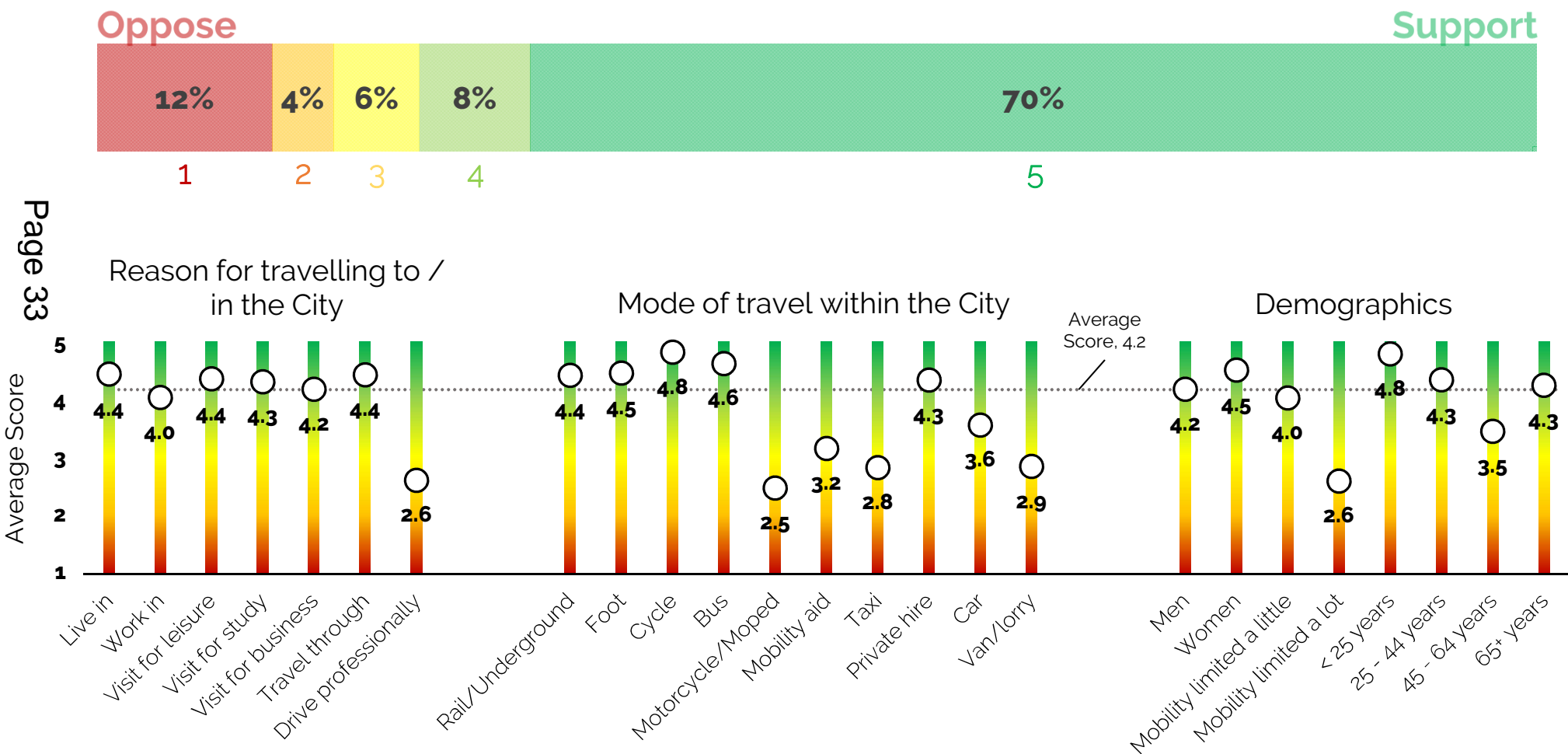


Proposal 24

Apply a minimum cycling level of service to all streets

2015 Responses

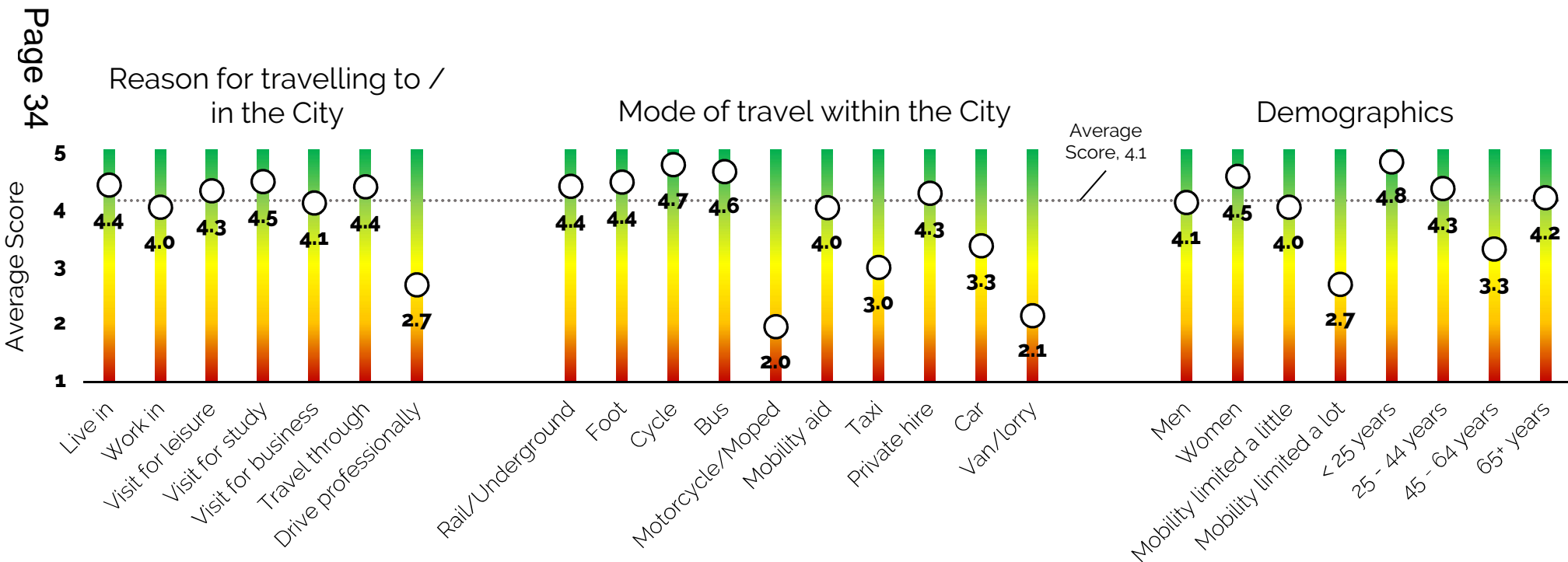
4.2 Average



Proposal 29 Support and champion a central London Zero Emission Zone

2016 Responses

4.1 Average

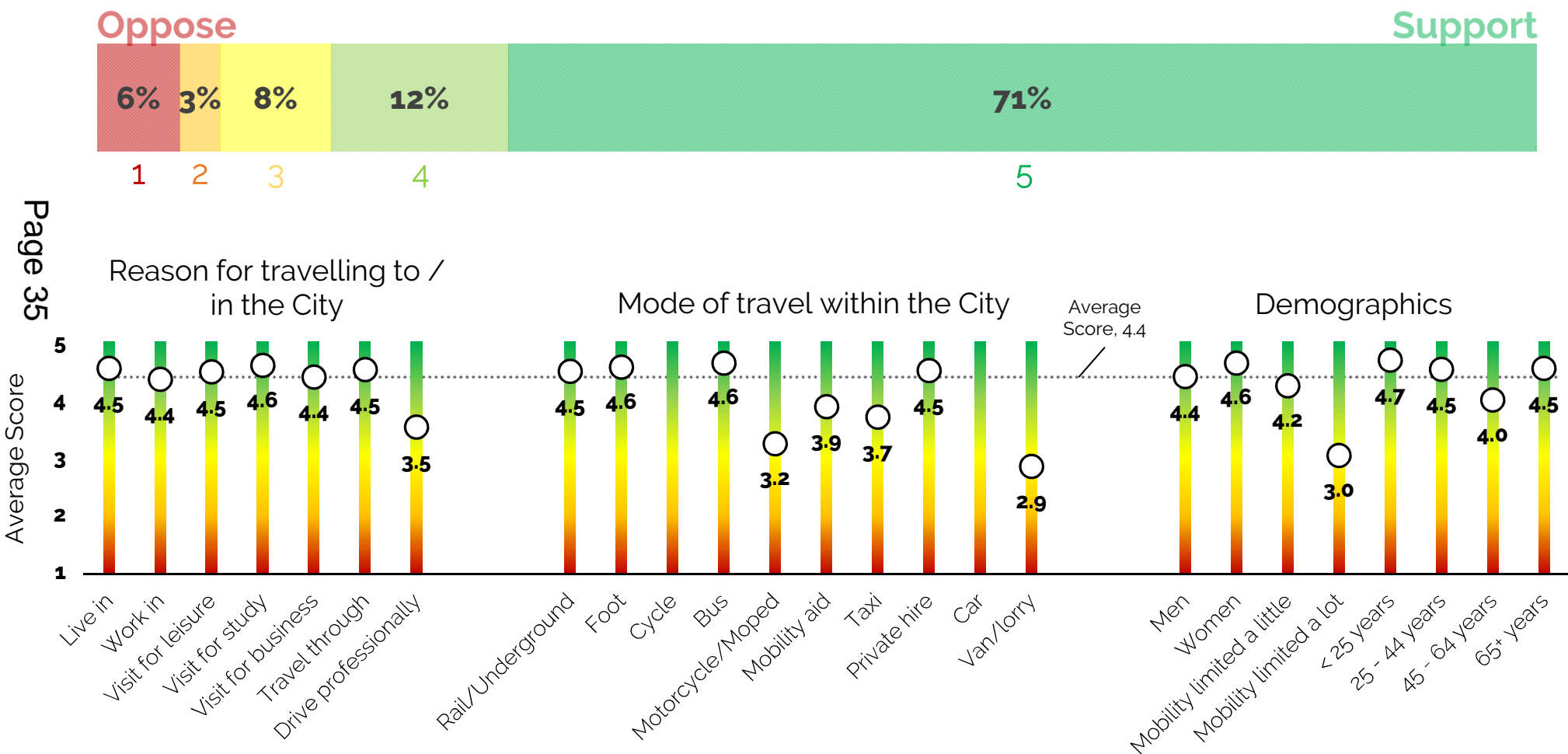


Proposal 38

Reduce the number of freight vehicles in the Square Mile

1932 Responses

4.4 Average



Proposal 41

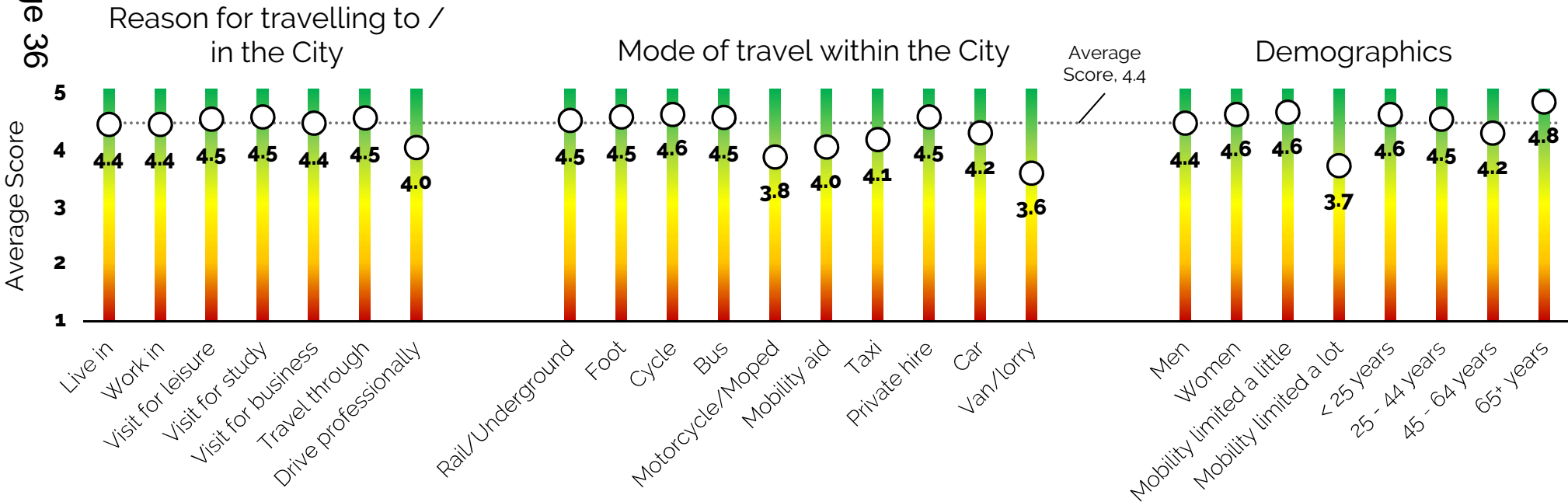
Reduce the impact of construction and streetworks

1847 Responses

4.4 Average



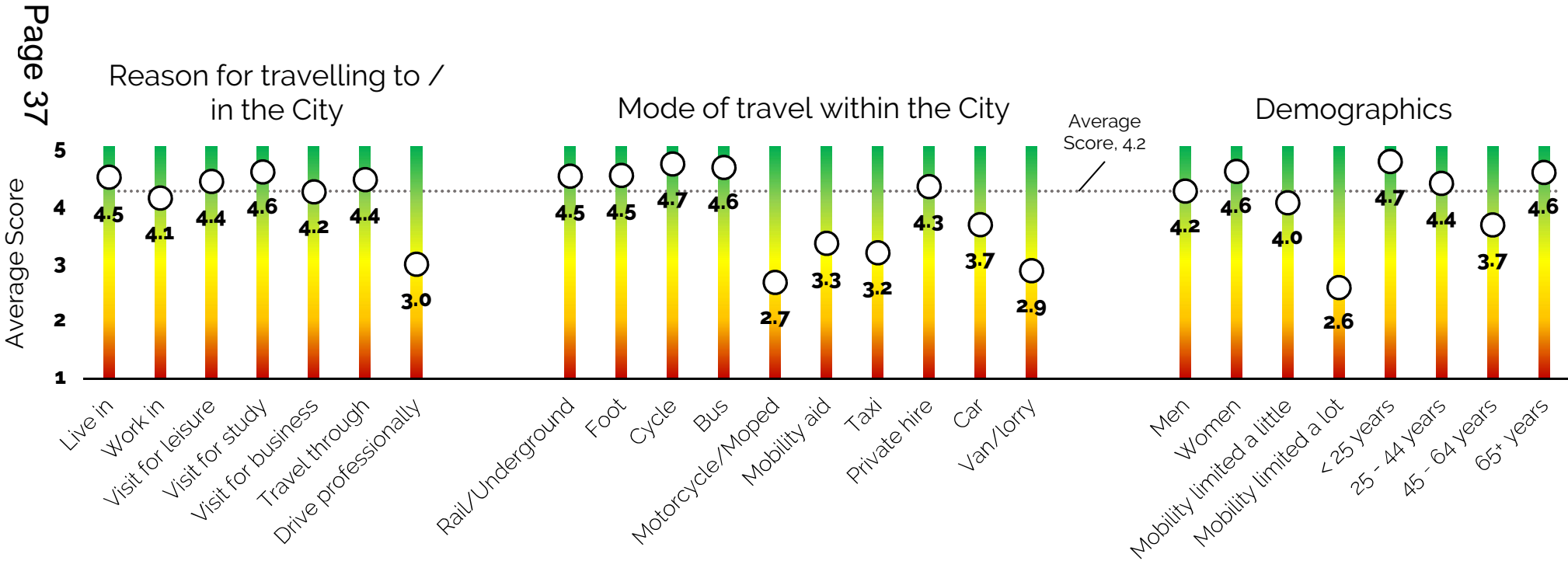
Page 36



Proposal 43

Establish a Future Transport Programme

2198 Responses
4.2 Average



Organisations providing written responses

Alliance of British Drivers	Licensed Taxi Driver's Association
ARUP/DP9 on behalf of British Land	Living Streets'
Barbican Association	London Cycling Campaign
Bike Taxi Limited	London Living Streets'
Brake	MCIA
Brewery Logistics Group	Port of London Authority
British Motorcyclists Federation	Port of Tilbury
Chancery Lane Association	Rail future
City Property Association	RMT London Taxi Branch
City Property Association NextGen Steering Group	Road Haulage Association
Citymapper	Royal Mail
COLAG	Salix Finance
Confederation of Passenger Transport	Society of Motor Manufacturers and Traders
Federation of Small Businesses	St Paul's Cathedral School
Freight Transport Association	Stop Killing Cyclists
FTC 2050	SYSTRA Ltd's
Gett UK	The Heron, Moor Lane Residents Committee
Greater London MAG	Tideway
Historic England	Unblock the Embankment
IAM RoadSmart	UPS
John Lewis	Transport for London
Landsec	

Appendix 2: Comment summaries and responses

Proposal 2: Put the needs of people walking first when designing and managing our streets

General expressions of support

355 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Barbican Association
- Bike Taxi Ltd
- Ramblers (both Blackheath and Inner London groups)
- Brake
- Centre for London
- Chancery Lane Association
- City Property Association
- City Property Association Next Generation Steering Group
- City of London Access Group
- Cross River Partnership
- FXpansion Audio UK
- La Fromagerie
- Living Streets (London and Westminster groups)
- London Tourist Coach Operators Association
- Railfuture
- Roadpeace
- Salix Finance
- SKC
- Saint Paul's Cathedral School
- Ten4 Design
- The Aldgate Partnership
- The Heron, Moor Lane Residents Committee
- The Tin Ltd
- Wheels for Wellbeing

Some respondents expressed support for specific measures, including pedestrian priority, diagonal crossings, pedestrianised routes, pavement widening and shorter waits at pedestrian crossings. Other respondents expressed support for the proposal because it would:

- Help alleviate crowded pavements
- Support good health for workers and economic outcomes for businesses
- Focus on a human-centred approach to transport infrastructure
- Improve the Square Mile as a place to live, work or both
- Help to reduce pollution
- Help to encourage people to walk or walk more
- Reflect the needs of the majority of users of the City's streets.

General expressions of opposition

84 people and the **Alliance of British Drivers, Brewery Logistics Group** and **Smithfield Market Tenants' Association** expressed opposition for this proposal. These organisations stated that all road users should be considered equally and people walking should not be prioritised over other street users.

Some respondents highlighted particular reasons for opposing the proposal including:

- People walking already have sufficient space
- Improving conditions for people walking and providing them with greater priority is not necessary
- People walking should not be prioritised over other street users or to the extent that all other transport users are excluded
- Motor vehicles should be prioritised

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
Concerns over vehicle access and impacts (180 comments)	<p>Comments in this group raised concerns regarding possible negative impacts of delivering the proposal. Nearly half of comments (80) raised concerns that the delivery of the proposal would reduce vehicle access for certain people, specific modes or to buildings.</p> <p>Of these comments, 33 raised concerns about access for disabled people who need to travel by motor vehicle. The Barbican Association, City of London Access Group and Gett UK were also concerned or wanted assurance that the proposal would not negatively impact on disabled people who need to travel by motor vehicle. The reminder (47), also raised concerns regarding the needs of or providing access for/to the following;</p> <ul style="list-style-type: none"> • Emergency vehicles 	<p>We recognise the concerns about vehicle access, and in particular, access needs of disabled people and deliveries. As set out in the Strategy, the principle of pedestrian priority streets is to provide greater priority to people walking while, in most instances, still allowing access for vehicles. The proposal will be updated to make this clearer.</p> <p>We note the concerns that the proposal could negatively impact traffic dispersion, congestion or pollution. As set out in the proposal it is accepted that delivering priority to people walking we may result in delays or reduced capacity for other street users. Impacts will be assessed and mitigated as far as possible during project development.</p>

	<ul style="list-style-type: none"> • Delivery and servicing vehicles (also stated by the Brewery Logistics Group and John Lewis) • Buses • To developments • Taxis (also stated by Gett UK) • Motorcycles and mopeds (also stated by Motorcycle Action Group) • Cycles, including cycle couriers and cargo cycles (also stated by Bike Taxi Ltd) • All vehicles/non-walking modes <p>The London Tourist Coach Operators Association requested consideration of the needs of coaches and the people they carry.</p> <p>67 comments raised concerns pedestrian priority streets or improvements to pedestrian crossings would result in:</p> <ul style="list-style-type: none"> • Traffic dispersion • Congestion or delay to other road users (also stated by Flit Technologies Ltd and Gett UK) • Pollution as a result of congestion • Negative impacts on local businesses • Poor cycle behaviour 	<p>Other proposals will lead to a reduction in traffic and improvements in air quality including Proposal 11 (reducing levels of motor traffic) and Proposals 29 – 33 (reducing emissions from road transport).</p>
<p>Support the proposal but request that it go further (44 comments)</p>	<p>13 comments asked for the proposal to be delivered faster, 8 comments asked for the proposal to be more ambitious and 11 asked for it to be delivered faster and to be more ambitious. Ten comments specifically requested for more pedestrian priority streets or pedestrianised streets, or for most or all of the City to be pedestrian priority or pedestrianised.</p>	<p>We note the requests for greater pace and ambition. We expect a number of schemes to be implemented far before the 2030 milestone date and have updated the proposal to provide more details of project timescales.</p>

	<p>London Living Streets and St Paul's Cathedral School also requested quicker implementation of pedestrian priority streets.</p> <p>Living Streets suggested setting a target for improving pedestrian crossings and listing the streets planned to be pedestrianised and made pedestrian priority. They also requested a timeframe for pavement widening. London Living Streets suggested working with Transport for London to ensure crossings are single stage rather than staggered, and that the minimum crossing speed should be based on a walking speed of 0.6m/sec.</p>	<p>Further details of projects that will be delivered over the next three years will be set out in the Delivery Plan that will be published alongside the final Strategy.</p> <p>We note the request to aim for lower maximum walking speeds and will review the target as implementation of the Strategy progresses.</p>
<p>Additional measures to be considered (45 comments)</p>	<p>This group includes comments with specific measures requested to be added to the proposal.</p> <p>15 comments were received asking for the behaviour of street users to be addressed. This included people walking while distracted and people jumping red lights when cycling.</p> <p>19 people requested that people walking and cycling are separated on pedestrian priority streets. There were also six comments requesting enforcement of pedestrian priority streets or pedestrianised areas.</p> <p>Five comments were received requesting that the measures are timed changes only, for example not to be applied at evening or weekends or outside of peak times.</p> <p>A small number of comments (3) requested that the proposal is applied at specific locations within the Square Mile, for</p>	<p>Similar comments people's behaviour have also been received in response to Proposal 20 and are addressed below.</p> <p>On pedestrianised streets, the use of cycles will be decided on a case by case basis, to ensure people walking and cycling feel safe and comfortable. The design of pedestrianised streets and the space for people walking and cycling will be addressed during project development and will reflect the features and characteristics of each street.</p> <p>The proposal sets out an approach to timing pedestrian priority in those instances when further access restrictions are required. The need for timed restrictions will be addressed on a case-by-case basis during project development.</p>

	<p>example, to pedestrianise Beech Street, or apply the measures at the most dangerous locations.</p> <p>British Land requested a pedestrian priority in the immediately area south of Liverpool Street station. London Living Streets requested specific proposals for key walking routes at Ludgate Circus, Old Broad Street and within the Culture Mile area. Saint Paul's Cathedral School requested the implementation of pedestrianised and pedestrian priority streets around St Paul's.</p>	<p>All comments on changes to specific locations have been noted and will inform the delivery of the Strategy.</p>
Concern on achieving the proposal	<p>Brewery Logistics Group and the City Property Association raised concerns on whether the achievability of a Pedestrian Comfort Level of B+. The City Property Association suggests the B+ target to be an aspirational minimum as opposed to a strict requirement for all future developments.</p>	<p>The Pedestrian Comfort Level of B+ is the recommended minimum level by Transport for London. Reducing crowding will be key to delivering Vision Zero and improving the experience of walking in the Square Mile. The target will be retained, with exceptions agreed on a case-by-case basis.</p>
Suggestions to deliver the proposal (10 comments)	<p>10 people provided suggested measures to support the delivery the proposal. These included;</p> <ul style="list-style-type: none"> • Building more highwalks • Working with businesses to encourage flexible working to alleviate pressure on the streets at peak times • Working with neighbouring boroughs to make the proposal even more effective • Change to the design and look of the street to make other street users feel like a guest, for examples cobbles to slow down the speed of people cycling and replacing tarmac in the carriageway with pavement materials • Improving the quality of the pavements as well as the quantity, including removing street furniture (also stated by Chancery Lane Association) 	<p>Measures related to the City's high walks are addressed in proposal 4.</p> <p>We will be working with businesses and neighbouring boroughs as key stakeholders of the Strategy to support and help deliver the proposal. This is set out in the delivery chapter of the Strategy.</p> <p>As set out in the proposal, changes to the design and look of the streets will be a key component of pedestrian priority streets and making improvements to the key walking routes. Improving the quality of the pavements is covered in Proposal 16 and reducing street clutter in Proposal 17.</p>

Proposal 11: Take a proactive approach to reducing motor traffic

General expressions of support

222 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- AWT Investments
- Bike Taxi Ltd
- Inner London Ramblers
- Brake
- Centre for London
- Cross River Partnership
- FXpansion Audio UK
- Lancefield Street Residents
- Living Streets
- London Tourist Coach Operators Association
- Railfuture
- Ramblers Inner London Area
- Sustrans
- SYSTRA Ltd
- Ten4 Design Ltd
- The Heron, Moor Lane Residents Committee
- The Tin Ltd
- Transport for London
- Wheels for Wellbeing

Some respondents expressed support for specific measures, including an updated road user charging regime, reducing the number of private hire vehicles, reducing the number of private cars, the reduction in parking for vehicles and reducing through traffic.

Other respondents expressed support for the proposal because it would:

- Help to reduce air and noise pollution
- Help to alleviate overcrowding on pavements by reallocating space
- Improve road safety
- Encourage people to walk or cycle
- Make the City a more pleasant place
- Improve people's health and help people to be more active

The following organisations expressed their support for the proposal but with some exceptions that are addressed in the table below:

- The **Licensed Taxi Driver Association**, with the exception of proposals to work with businesses to reduce the use of taxis
- **Gett UK**, but disagree with the aim of reducing all types of motor traffic
- **RMT London Taxi Drivers**, with the exception that taxis should be treated the same as buses

General expressions of opposition

42 people and the **Alliance of British Drivers** and **Unblock the Embankment** expressed their opposition for this proposal (in full or in part) but made no specific suggestions or requests for changes.

Some respondents expressed opposition to specific measures or highlighted particular reasons for opposing the proposal, including changes to parking provision on street, opposing any charge or tax on motorists or that the proposal is not necessary.

The **Alliance of British Drivers** expressed their opposition to this proposal on the basis that reallocation of street space to provide space for people walking and cycling is ‘unjustifiable on any rational or cost/benefit analysis’.

The campaign group **Unblock the Embankment** opposes the proposal on the basis that it will result in increased traffic on the A3211 (Victoria Embankment and Upper and Lower Thames Streets). 500 template emails were received via the Unblock the Embankment website. The template mirrors the Unblock the Embankment response and concern that delivering this proposal will lead to increased congestion on the A3211.

The **City of London Access Group** raised concerns that a new charging regime would place an economic barrier on those for whom access to the Square Mile is only possible via a private car or private hire vehicle and that access restrictions would reduce accessibility.

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
Encourage the use of powered two wheelers (247 comments)	<p>Comments in this group asked that the proposal should seek to encourage the use of powered two wheelers to reduce congestion and pollution.</p> <p>The Motorcycle Industry Association suggested powered two wheelers should be listed as essential traffic.</p>	<p>We recognise that there is a positive role for powered two wheelers for certain journeys where a non-motorised or public transport alternative is not available. In these instances, travelling by powered two-wheeler is likely to have a lower impact on congestion and pollution than using a private car. However, there is limited potential for modal shift to</p>

	<p>The Motorcycle Action Group stated that a modal shift to powered two wheelers would help reduce the use of private cars and private hire vehicles.</p>	<p>powered two-wheeler form private cars, taxis and private hire vehicles. Actively encouraging travel by powered two wheelers may also result in some shift away from walking, cycling and public transport (93% of commuter travel).</p> <p>As a result, we will not be actively encouraging travel by powered two wheelers but will undertake further analysis to understand their use and potential, both private and commercial, before implanting any proposals that might discourage their use or negatively impact on current users.</p>
<p>In support of the proposal but request for it to go further (147 comments)</p>	<p>Comments in this group expressed support for the proposal but also requested for the proposal to go further or be more ambitious.</p> <p>Almost half of comments (73) in this group asked for a faster pace of delivery, a more ambitious target, or both.</p> <p>St Paul's Cathedral School requested a 25% reduction in motor traffic by 2030, SKC requested a more ambitious target of 40% by 2030 and the Cross River Partnership highlighted the need for the proposal to be as ambitious as possible. The City Property Association proposed that the Strategy include a target for reductions in traffic beyond 2044, with the use of any private vehicles within the City of London gradually phased out.</p> <p>55 comments included requests to reduce particular types of vehicle. The majority of comments asked for the number of taxis in the Square Mile to be reduced. A small number of these asked for a complete ban of taxis in the City. A1X Limited</p>	<p>Reflecting the requests for a more ambitious target, the aim of a 25% reduction in motor traffic by 2030 will be updated to a minimum aspiration. However, the rate at which traffic volumes are reduced is largely dependent on actions by the Mayor of London and Transport for London and it is difficult to commit faster timescales.</p> <p>We note the requests to reduce or remove taxis, private hire vehicles and private cars as far as possible. Reductions in all types of motor traffic will be required to meet the traffic reduction target. The potential for reduction in traffic beyond the proposed targets will be considered when the Transport Strategy is reviewed and updated in 2024.</p> <p>We note the requests for a reduction or elimination of on-street parking, introduce a workplace parking levy and reduce obstructions by stationary vehicles. These</p>

	<p>requested removing as many taxis from the City as possible and London Living Streets suggested the use of 'sanctions' to reduce empty cab running and were concerned that the use of ride hailing apps would increase rather than reduce empty running of cabs.</p> <p>A small number of respondents requested a removal or ban of all private cars or non-essential traffic from the City (also requested by campaign group Stop Killing Cyclists). The Brewery Logistics Group suggested that car drivers should be penalised for bringing their cars into the City.</p> <p>A1X Limited requested removing as many private hire vehicles from the City as possible and FXpansion Audio UK request an extra licensing levy to be applied to private hire vehicles.</p> <p>14 comments requested a reduction in on-street parking or for it to be removed entirely. London Living Streets suggested that on-street parking should be reduced rather than no additional parking be provided.</p> <p>A small number of respondents asked for one of the following;</p> <ul style="list-style-type: none"> • Introduce a workplace parking levy • Introduce red route restrictions 24/7 or ban vehicles stopping on main roads • Prevent delivery vehicles parking illegally and retime freight deliveries <p>Road Peace requested urgent action against personal deliveries being made to the workplace.</p>	<p>requests are addressed along with other similar comments in the response to Proposal 14.</p> <p>Requests to retime freight deliveries and reduce personal deliveries are noted and these are addressed along with other similar comments in the response to Proposal 38 and 39.</p>
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<p>Concerns over impacts or delivery (36 comments)</p>	<p>Comments in this group raised concerns regarding the delivery of the proposal or potential impacts of the proposal.</p> <p>More than half of the comments (22) in this group were concerned that the delivery of the proposal would impact access by certain people, specific modes or to buildings. Of these, most of the comments (16) were concerned about maintaining access for disabled people.</p> <p>The organisation City of London Access Group raised the following concerns regarding accessibility:</p> <ul style="list-style-type: none"> • restricting access to the road network through a charging regime • assuming making use of a private car or private hire vehicle is a luxury or unhealthy transportation choice • restricting and reducing the free-flow of private hire vehicles within the City further <p>A small number of comments also raised concerns around providing access for commercial vehicles and for residents.</p> <p>The remaining comments (9) raised concerns on the proposals' impact on traffic displacement and traffic congestion, and pollution as a result of congestion. The Confederation of Passenger Transport raised a concern about the displacement of traffic from the City to radial routes. Unblock the Embankment opposed the proposal on the grounds that will result in increased traffic on Victoria Embankment and Upper and Lower Thames Streets. This view was echoed in the template responses generated via the Unblock the Embankment website</p>	<p>This proposal seeks to reduce general traffic to improve conditions for essential traffic, which includes taxis, private hire vehicles and private cars used by people with particular access needs. We will work closely with City of London Access Group to ensure the needs of disabled people are fully considered during the development of an updated road user charge.</p> <p>The measures in the proposal, in particular supporting an updated road user charge at a central London or London-wide level, will help reduce traffic beyond the City's boundary and are not expected to result in displaced traffic or increased congestion and pollution.</p>
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<p>Requests for specific considerations in developing the updated road user charge (20 comments)</p>	<p>Comments in this group asked for specific considerations of how the updated road user charge would operate.</p> <p>19 comments asked for the current or updated charge to include more types of vehicles than are included in the existing congestion charge. Respondents asked for private hire vehicles, taxis, hybrid vehicles and buses to be included in any current or future charging. Stop Killing Cyclists also requested taxis to be included in any road charging.</p> <p>The City Property Association commented that the City Corporation should be a front runner in establishing the next system, potentially ahead of TfL's programme.</p> <p>A number of organisations commented on modal concerns or requests regarding the current or future congestion charge:</p> <ul style="list-style-type: none"> • The Brewery Logistics Group opposed any increased road user charges for HGVs, while John Lewis and Tideway stated that the road user charge increases should not be directed to delivery vehicles. • The Licensed Taxi Driver Association supported the proposal with exception to discouraging businesses from utilising taxis, whilst RMT London Taxi Drivers supported the proposal with exception that taxis should be treated the same as buses. • Gett UK supported the proposal but disagreed it should be achieved by reducing all forms of motor traffic. • The Confederation of Passenger Transport requested that essential traffic, including coaches, are exempt by any charging regime. 	<p>We will engage with TfL to ensure any new road user charging includes (or excludes) the appropriate vehicles and journeys, to enable our traffic reduction targets to be achieved.</p> <p>We are committed to exploring an appropriate charging mechanism for the Square Mile if TfL's timescales do not support our traffic reduction targets. However, as stated in the proposal, the first preference is for a central London or London wide road user charging scheme managed by TfL, to avoid a patchwork approach and to help reduce traffic over a wider area.</p> <p>Any updated road user charging scheme implemented by TfL will be expected to replace the current congestion charge and potentially incorporate and not be an additional charge. We also expect it combine all existing emission charges in to the charge, rather than having several separate charges made on motorists for making the same journey.</p>
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	<ul style="list-style-type: none"> The Motorcycle Action Group and the Motorcycle Industry Association requested exemption for powered two wheelers from any charging regimes. <p>The Freight Transport Association strongly opposes any road user charging scheme being introduced on a borough by borough basis and the Federation of Small Businesses states concern over any acceleration in the development of the next generation of charging unless in full consultation with businesses.</p> <p>UPS and Society of Motor Manufacturers and Traders oppose additional road user charging on top of the congestion charge and ULEZ.</p>	
Additional measures or suggestions to deliver the proposal (11 comments)	<p>Comments in this group asked for additional measures or suggestions to deliver the proposal.</p> <p>Ten comments requested improving the affordability and quality of public transport so that more people are encouraged to or can travel by public transport. One comment suggested making bus travel in Central London free.</p> <p>The Aldgate Partnership requested working with neighbouring boroughs to ensure circling or idling taxis do not become a problem.</p>	<p>Having appropriate public transport provision is fundamental for commuters, residents and visitors travelling to the Square Mile. This measure is addressed along with other similar comments in the response to Proposal 47.</p> <p>Reducing circling taxis is a key measure in reducing the volume of traffic on City streets, and we will work with our neighbouring boroughs to address this.</p>
Reduce the scale of the proposal (8 comments)	<p>A small number of comments (4) stated that all the on-street parking is needed or that more parking is required.</p> <p>The remaining comments were opposing the reduction in buses as this would reduce the quality of bus services.</p>	<p>We note the request that on-street parking is needed and address this in the response to Proposal 14.</p> <p>We recognise the concern of reducing bus numbers impacting the quality of bus services. This is addressed along in the response to Proposal 49.</p>

Proposal 14: Make the best and most efficient use of the kerbside and car parks

General expressions of support

148 people and the organisations listed below expressed their support for this proposal (in full or in part) but made no specific suggestions of requests for changes.

- A1X Ltd
- AWT Investments Ltd
- Centre for London
- Cross River Partnership
- Flit Technologies Ltd
- FXpansion Audio UK Ltd
- Lancefield Street Residents
- London Tourist Coach Operators Association
- Rail Future
- Ramblers Inner London Area
- Road Peace
- SKC
- Ten4 Design
- The Aldgate Partnership
- The Heron, Moor Lane Residents Committee
- The Tin Ltd
- Transport for London
- Wheels for Wellbeing

Some respondents expressed support for specific measures including reallocating space to people walking, cycling and public space, more cycle parking, using the spare capacity in car parks for alternative uses, undertaking a kerbside review every five years, introducing variable charging for motorcycles, flexible use of spaces and reducing the number of parking spaces.

Other respondents highlighted particular reasons for supporting the proposal, including:

- too much space is currently given to vehicles and there are too many on-street parking spaces
- car parking on-street makes it more dangerous for people walking to cross the road and for people cycling
- there are too many delivery vehicles parked on the street, some of which park partially on the pavement
- providing parking spaces undermines the needs of the majority of users to provide convenience for a minority
- on-street space for parking is inefficient, a poor use of public space and an eyesore
- removing car parking spaces will encourage people to use alternative transport methods

In addition, the following organisations expressed their support for the proposal, but with minor exceptions that are addressed in the table below:

- Federation of Small Businesses, with exception to reducing the maximum loading period
- RMT London Taxi Drivers, but would not support any space for taxi ranks or rest bays to be reallocated

General expressions of opposition

45 people and the organisations listed below expressed their opposition for this proposal (in full or in part) but made no specific suggestions of requests for changes.

- British Motorcyclists Federation
- CIC
- Motorcycle Action Group
- Motorcycle Industry Association

Some respondents expressed opposition for specific measures including exploring the feasibility of reducing on-street motorcycle spaces and introducing variable parking charging.

Some respondents highlighted particular reasons for opposing the proposal, including:

- It is already difficult to find a parking space
- Parking near the destination reduces drive time and congestion
- Parking is already expensive
- Vehicles are a necessity of daily life
- It is biased to pedestrians
- Using public transport is not a viable option for everyone

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
<p>Oppose by doing less (138 comments)</p>	<p>Comments in this group requested for the proposal to do less for a specific measure.</p> <p>Over half of the comments (85) did not support a reduction in motorcycle parking. The Motorcycle Action Group and Motorcycle Industry Association opposed reallocating motorcycle parking to other uses.</p> <p>Approximately a quarter of comments (39) did not support a potential introduction of variable charge for motorcycle parking. The Barbican Association stated that larger motorbikes are starting to incorporate a number of innovations that would be beneficial in an urban environment and therefore suggest it is not wise to penalise them. Motorcycle Action Group and Motorcycle Industry Association also opposed the idea of variable parking charges.</p> <p>A small number of comments (12) requested the on-street car parking spaces to be retained whilst a further couple of respondents wanted cheaper or free car parking in the City.</p> <p>The Federation of Small Businesses and Freight Transport Association opposed reducing the maximum loading period, while the Road Haulage Association requested time restrictions for loading and unloading are sufficient for HGV's to unload. The City Property Association raised a concern that reducing the maximum loading period would create additional</p>	<p>We note all comments on motorcycle parking, car parking and reducing the maximum loading period for deliveries.</p> <p>The regular review of the management and use of the kerbside is essential to improve the efficiency of kerbside use and help to deliver other proposals within the Strategy.</p> <p>We recognise that further analysis is required to better understand the current use and potential role for powered two wheelers. We will undertake this research before implementing any part of the proposal that will impact powered two wheelers. In addition, all potential changes that will be considered (including introducing variable charging for motorcycles and reducing the maximum unloading time) will be fully researched and assessed, with engagement with the relevant industries, before any changes are confirmed or implemented. We will update the proposal to reflect this.</p>

	<p>challenges for delivery vehicles with consolidated loads for multiple buildings, whilst FTC 2050 stated that it could encourage drivers to spend more time circulating when carrying out multi-drop delivery operations. IAM RoadSmart stated that it is already in the interests of delivery drivers to minimise their time at the kerbside and the maximum time should allow reasonable time for the vast majority of deliveries to be completed. Tideway requests reducing maximum loading periods should be considered in the context of the purpose of the type of delivery or collection required.</p>	
<p>Encourage the use of powered two wheelers (110 comments)</p>	<p>Comments in this group asked that the proposal should seek to encourage the use of powered two wheelers to reduce congestion and pollution. These comments made no direct comments on the proposal, but stated their support for powered two wheelers.</p>	<p>We recognise that there is a positive role for powered two wheelers for certain journeys where a non-motorised or public transport alternative is not available. In these instances, travelling by powered two-wheeler is likely to have a lower impact on congestion and pollution than using a private car. However, there is limited potential for modal shift to powered two-wheeler from private cars, taxis and private hire vehicles. Actively encouraging travel by powered two wheelers may also result in some shift away from walking, cycling and public transport (93% of commuter travel). As a result, we will not be actively encouraging travel by powered two wheelers but will undertake further analysis to understand their use and potential, both private and commercial, before implanting any proposals that might discourage their use or negatively impact on current users.</p>

<p>Support but go further with the proposal (43 comments)</p>	<p>This group of comments stated their support for the proposal but requested for it to go further in its pace or ambition.</p> <p>More than half of the comments (22) asked for on-street parking to be phased out or completely removed. The campaign group Stop Killing Cyclists requested all private on-street car parking to be removed in a year. A further ten comments requested to reduce the number of vehicles in the City or ban them entirely.</p> <p>Six comments asked for the proposal to be delivered faster or to be more ambitious but with no specific requests. The remaining comments asked for one of the following;</p> <ul style="list-style-type: none"> • To increase parking charges • To introduce a workplace parking levy • To set a target for parking space reduction 	<p>The kerbside review will explore the potential to reallocate space from on-street car and motorcycle parking, however much of the current parking is heavily used by commercial vehicles. Throughout the lifetime of the Strategy the demand for on-street parking further may reduce as measures to reduce both private and commercial traffic are introduced. This may result in further opportunities to phase out or fully re-allocate the traditional parking bay. These opportunities will be considered in further reviews, which will be undertaken at least every five years.</p> <p>Parking charges and any potential targets will be considered as part of the review. A workplace parking levy is not included in the proposal as there are relatively limited amounts of workplace parking in the Square Mile.</p>
<p>Additional measures to include in the proposal (16 comments)</p>	<p>The following measures were also suggested by respondents and organisations.</p> <p>Half of the requests (12) received asked for those who stop, park or leave their vehicle either in a cycle lane, partially on the pavement or in an area that has an impact on traffic flow are penalised, banned from the City or are prevented from doing so.</p> <p>A small number of comments (4) requested for one of the following;</p> <ul style="list-style-type: none"> • Increase parking spaces for shared car clubs • Remove all street furniture • Remove cycle parking from pavements and relocate to the carriageway 	<p>Reducing obstruction on bus and cycle routes and the potential to reallocate car parking to cycle parking are already included in his proposal. Removing unnecessary street furniture is addressed in Proposal 17. The potential role of car clubs will be considered as part of our Future Transport Programme (Proposal 43).</p> <p>We note London Living Streets and RMT London Taxi Drivers suggestions, and will consider these in the kerbside review.</p> <p>Our approach to electric vehicle charging facilities, including avoiding placing charging points on pavements, is set out proposal 30.</p>

	<p>London Living Streets requested for single yellow lines to be replaced with double yellows on narrow streets.</p> <p>RMT London Taxi Drivers suggested providing rest bays for taxi drivers where there is spare capacity in car parks.</p> <p>Sustrans asked for a commitment to provide all electric charging facilities on carriageway and not on footways.</p>	
<p>Concerns on the impact of the proposal (8 comments)</p>	<p>This group of comments raised concerns on the impact of the proposal.</p> <p>Half of the comments (4) raised concerns for about vehicle access for disabled people. City of London Access Group sought clarification on the policy position with regard to disabled parking, and how the Strategy will impact the Red Badge Scheme and disabled parking provision.</p> <p>The Brewery Logistics Group requested that enough kerbside space is made available for distributors, whilst The Royal Mail raised a concern over the reduction in kerbside parking for their vehicles.</p> <p>The following concerns were also raised:</p> <ul style="list-style-type: none"> • introducing variable charging for motorcycles will be too complicated • measures in the proposal would cause illegal parking due to a lack of appropriate parking or unloading space • The Federation of Small Businesses sought clarification of how multi use spaces will be policed 	<p>The kerbside review will ensure there is adequate on-street provision of disabled bays and commercial parking. Any changes to other kerbside uses will be fully assessed on their impact on disabled and commercial parking, i.e. changes to on-street car parking or to single yellow lines.</p> <p>The nature of and charges and potential impacts of implementing any changes to parking and loading will be considered as part of the review. Further details of enforcement of multi-use bays will be provided as these proposals are developed.</p>

Proposal 17: Keep pavements free of obstructions

General expressions of support

156 people and the organisations listed below expressed their support for this proposal (in full or in part) but made no specific suggestions of requests for changes

- A1X Limited
- Alliance of British Drivers
- AWT Investments
- Barbican Association
- Bike Taxi Limited
- City of London Accessibility Group (COLAG)
- Flit Technologies Limited
- John Lewis Partnership
- London Tourist Coach Operators Association (LTCOA)
- Railfuture
- RMT Taxi Branch
- Roadpeace
- SKC
- Sustrans
- Transport for London

Some respondents expressed support for specific measures or highlighted particular reasons for supporting the proposal, including:

- Restrictions on A-boards and other street clutter
- Ensure pavements are not blocked outside pubs
- Designated parking areas for dockless cycles

While not explicitly addressed in this proposal, **LCC, LLS, QuarterOne, Roadpeace, Sustrans** and 22 people expressed their support for placing of charging units in the carriageway rather than the footway when installed on street.

The **Aldgate Partnership** and **Cross River Partnership** (CRP) expressed their support for one or more elements of the proposal but had concerns about one or more elements of the proposal, which are addressed in the table below:

General expressions of opposition

34 people expressed their opposition for this proposal (in full or in part) but made no specific suggestions or requests for changes.

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
<p>Concern and opposition in delivering a clear pavement policy (332 comments)</p>	<p>168 people highlighted concerns about measures to reduce the impact of drinking outside pubs. These included:</p> <ul style="list-style-type: none"> • Drinking outside pubs is part of the City's culture and character • Pubs are too small in the City for everyone to drink inside • People enjoy drinking outside in the summer • The City would feel sterile • The impact of barriers to indicate areas where drinking is allowed • Negative impact on business <p>Aldgate Partnership also raised concerns on restrictions to outdoor drinking in warmer months as it is beneficial to the look and feel of the City.</p> <p>106 people expressed a lack of support for removing or restricting use of outdoor seating. Specific concerns were that the proposal would:</p> <ul style="list-style-type: none"> • Negatively impacting the cultural offer and character of the City and make the Square Mile feel sterile • Remove seating that is needed by people with limited mobility who need regular places to sit and rest 	<p>In line with existing licensing policies this proposals seeks to manage rather than ban or unduly restrict outdoor drinking and seating. We recognise that eating and drinking outside, especially in summer months, is an important part of the City's culture. However in places this can result in access or safety issues due to pavement crowding.</p> <p>It is recognised that flexibility of dockless cycle hire is one of its key benefits to users, however designated parking areas for dockless cycles are considered necessary to prevent cycles obstructing pavements.</p> <p>While we understand and recognise the concerns of these commenters, restricting the use of A-boards is considered necessary to improving accessibility, especially in the context of expected growth in working population. We will engage with business groups to explore alternative means of promoting businesses that would be difficult to locate without additional signage.</p>

	<ul style="list-style-type: none"> • Stop people enjoying eating/drinking outside in summer • Have a negative impact on business <p>Whilst supportive of the proposal, LLS and CRP noted that seating is essential to people of limited mobility and for placemaking.</p> <p>32 people did not support designated parking areas for dockless cycles – as this would remove one of the key benefits of a dockless scheme – or left comments that were generally supportive of the use and benefits of dockless cycles.</p> <p>26 people were not supportive of our commitment to not permit A-boards and reduce other street clutter. Commenters were concerned that the proposal will negatively impact trade by making businesses, and particularly those not in areas of high footfall, less visible. The FSB and the Aldgate Partnership also raised concerns that businesses would no longer be as visible and that this may harm trade.</p>	
Support and go further/additional suggestions (15 comments)	<p>6 people suggested banning dockless cycles entirely based on the impact they have when left inappropriately on pavements.</p> <p>A further 6 people suggested that flat and level pavements should be considered as part of a clear pavement policy</p>	<p>As outlined in Proposal 28 we believe there is a role for well-managed dockless cycle hire that avoids bikes obstructing pavements.</p> <p>Flat and level pavements are essential to creating an accessible Square Mile and improvements will be delivered as part of walking improvements (Proposal 2) and identified through accessible street audits (Proposal 16).</p>

	A few people were supportive of widening pavements to better facilitate drinking outside pubs and outdoor seating whilst minimising impacts on accessibility.	Proposal 7 outlines our aspirations to provide a high quality public realm, include identifying opportunities to create new public spaces by reallocating carriageway.
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Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

General expressions of support

156 people and the organisations listed below expressed their support for this proposal (in full or in part) but made no specific suggestions of requests for changes

- Barbican Association
- Brake
- Chancery Lane Association
- City Property Association
- Cross River Partnership
- Flit Technologies Limited
- Port of Tilbury
- Railfuture
- Salix Finance
- St Pauls School
- Stop Killing Cyclists
- Systra
- Transport for London

Some respondents expressed support for specific measures or highlighted particular reasons for supporting the proposal, including:

- Safer road user behaviours
- Need for strong enforcement of speed, vehicles and behaviours
- 15mph
- Intelligent Speed Adaptation (ISA)

Conditional/specific support

The following organisations detailed support for specific elements for the proposal and/or conditions of support.

- Confederation of Passenger Transport (CPT)
- Federation of Small Businesses (FSB)
- Freight Transport Association (FTA)
- John Lewis Partnership
- London Cycling Campaign (LCC)
- London Living Streets (LLS)
- London Tourist Coach Operators Association (LTCOA)
- London Taxi Drivers Association (LTDA)
- Smithfield Market Tennent's' Association
- The Heron Residents, 5 Moor Lane

General expressions of opposition

17 people and the organisations listed below expressed their opposition for this proposal (in full or in part) but made no specific suggestions or requests for changes.

- Alliance of British Drivers (ABD)
- Brewery Logistics Group (BLG)
- La Fromagerie
- Motorcycle Action Group (MAG)
- Smithfield Market Tenants' Association (SMTA)

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
Opposition or Concern to specific measures (291 comments)	<p>291 people and several organisations did not support a 15mph speed limit on City streets, reasons included:</p> <ul style="list-style-type: none"> • 15mph is too slow • 20mph hasn't reduced casualties • People do not drive at 20mph so why will they drive at 15mph? • 15mph is too slow to ride a motorcycle at safely • Air quality will worsen • Congestion will worsen • Cyclists ride faster than 15mph • Variable speed limits will confuse drivers across central London <p>Organisational responses included the ABD, IAM Roadsmart and SMTA expressed opposition on grounds that it would not improve safety and there is no evidence basis. The BLG and FSB and La Fromagerie</p>	<p>Whilst we understand that there are concerns relating to the impact and suitability of a 15mph speed limit, safer speeds is a core component of the safe systems approach to reducing road danger.</p> <p>We do not expect the 15mph speed limit to have a significant impact on air quality or congestion as it will be delivered alongside measures to reduce vehicle numbers and emissions. All impacts of the limit, including increased journey times and specific impacts to motorcyclists will be considered as part of scheme development.</p> <p>A new lower speed limit would be delivered across the Square Mile rather than specific streets and specific times. The City is becoming an increasingly 24hr destination and we must protect all road users at all times.</p>

	<p>are concerned that it would increase vehicle requirements for making deliveries. Both the CPT and LTCOA identified longer journey times for coach passengers as a concern. John Lewis Partnership and the MAG did not support 15mph as differing speeds limits in different authorities would be too difficult for drivers</p> <p>Tideway supported the proposals but asked for mandated HGV driver breaks to be considered in slowing speeds, whilst recognising the impact was likely to be minimal.</p> <p>34 people and La Fromagerie expressed concern that the proposals will make air quality worse because:</p> <ul style="list-style-type: none"> • 15mph is not the optimum speed for combustion engines • Redesigning junctions to give priority away from motor vehicles will increase idling <p>29 people suggested that Vision Zero was not achievable as streets are dangerous by their nature and people will always make mistakes. MAG also felt that Vision Zero is not achievable.</p> <p>18 people and the ABD and BLG did not support the proposal as it would worsen congestion in the Square Mile.</p> <p>The LTDA did not support ISA as they see it as unnecessary in reducing road danger due to the strong</p>	<p>Adoption of Vision Zero is necessary to ensure that the City is an enjoyable place to live, work or visit. We do recognise that achieving this will be challenging but do not believe it is acceptable or inevitable that people are killed or seriously injured on our streets.</p> <p>Whilst there may be upgraded safety features in the newest taxis it does not improve safety for those walking, cycling or riding who may be involved in a collision with a taxi. Whilst these safety features are welcome, we believe they are complimentary to ISA rather than an alternative for it.</p> <p>We note the request from the RMT London Taxi Branch.</p> <p>Whilst we agree with the CPT that coaches are subject to strict safety regulations, an accreditation scheme, similar to FORS for freight, will assist in delivering Vision Zero.</p> <p>We will therefore not make any changes to this proposal to reflect these comments.</p>
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	<p>safety record of taxis, citing only 2 serious injuries involving taxis in all of London in 2017. They also highlighted the advancement in airbag technology within the newest Taxi model as a reason that it would not be required. The BLG stated that ISA would create more emissions and congestion. The RMT London Taxi Branch, whilst not unsupportive of ISA, requested that we engage with TfL when developing any proposals.</p> <p>The CPT also requested that we did not pursue FORS for coaches as coaches are already subject to strict safety requirements.</p>	
<p>Improve the behaviour of street users. (183 comments)</p>	<p>183 people raised issues regarding poor behaviour of people cycling (104 comments), walking (55 comments) and driving (34 comments) and the need to better manage and police these behaviours.</p> <p>104 people commented on poor behaviour by people cycling, including:</p> <ul style="list-style-type: none"> • Running red lights or crossing junctions on pedestrian green signals • Riding on pavements • Parking inappropriately • Not giving way to people walking • Cycling aggressively or acting in an antisocial way, especially in shared spaces like Queen Street • Endangering themselves or other street users <p>The comments both directly and indirectly identified changing these behaviours as key to reducing casualties, particularly death and serious injuries</p>	<p>This proposal sets out plans for the delivery of our Safer Systems approach, of which seeking to improve street user behaviour is a core component. Raising awareness of good street user behaviour amongst all road users is an important aspect to reducing collisions caused by anti-social behaviour on our street network. We will deliver a series of targeted behaviour change campaigns through our Road Danger Reduction Action Plan which will include targeting the poor behaviours noted in these comments.</p> <p>These schemes campaigns and enforcement activities will serve to improve the behaviour of those who use City streets and complement other schemes relating to safer speeds, streets and vehicles.</p> <p>We will include TfL's request to incorporate their vehicle enforcement programmes into our text but make no further changes to the proposal.</p>

	<p>sustained to people walking. We received an additional 115 comments relating to poor cyclist behaviour in responses to proposal 24.</p> <p>55 comments related to poor behaviour by people walking, including:</p> <ul style="list-style-type: none"> • Distractions such as looking at phones when walking or listening to music • Stepping into the carriageway • Crossing on red lights <p>We received 15 additional comments in response to proposal 2, principally relating to improving the behaviour of those walking and/or removing distractions.</p> <p>34 people commented on poor driver behaviour, including:</p> <ul style="list-style-type: none"> • Need for more driver training and accreditation schemes, especially for professional drivers • Running red lights • Close passing cyclists • Accelerating aggressively at junctions • Distractions in vehicle, such as GPS systems <p>COLAG and John Lewis Partnership wanted to ensure that all safer behaviour schemes and campaigns applied to all road users.</p>	
Support and go further (100 comments)	We received 100 comments which wished for proposal 20 to go further. These comments were predominantly associated with more emphasis on improving behaviour	Comments relating to safer behaviours are addressed above.

	<p>as outlined above, including better education and training.</p> <p>The Heron, Moor Lane Residents' Committee requested that a 5mph speed limit be introduced around their building and LLS requested considering a 10mph speed limit at key locations, such as on Bishopsgate outside Liverpool Street station.</p> <p>We received 36 comments requesting that we deliver the proposed measures faster, specifically related to 15mph and the delivery of safer streets.</p> <p>Sustrans also strongly supported proposal 20 and requested that Healthy Streets checks should be used for all proposed schemes and any which score 0 in any criteria do not progress</p>	<p>We note the ambition of The Heron, Moor Lane Residents' Committee and LLS but do not propose speed limits below 15mph at this time. Monitoring of the 15mph speed limit if implemented will inform any future review of speed limits</p> <p>We will seek to deliver changes as quickly as possible but believe the dates for delivery are appropriate as there is significant work required to develop and deliver significant changes.</p> <p>As set out in Proposal 1, Healthy Streets Checks will be used for all appropriate schemes.</p>
Other organisational responses	<p>COLAG support was conditional on the look and feel of streets not being adversely impacted.</p> <p>The FTA requested that the safer vehicles section be broadened to consider other accreditation schemes and standards beyond FORS as there is concern that this is becoming a monopoly.</p> <p>LCC suggested including these standards in our own procurement regulations.</p> <p>Roadpeace strongly supported proposal 20 but requested that we change terminology from 'casualties' to 'reported casualties to reflect that actual numbers may be higher.</p>	<p>We will consider the design of streets during project development and do not expect the delivery of this proposal adversely affect the look and feel of the Square Mile.</p> <p>The proposed standards are already reflected in our procurement practices, We will continue to review and improve our procurement codes to reflect best practice.</p> <p>We will update the strategy to introduce 'reported casualties' rather than 'casualties' and include the potential to use other suitable accreditation schemes and standards.</p>

Proposal 24: Apply a minimum cycling level of service to all streets

General expressions of support

177 people and the organisations listed below expressed their support for this proposal (in full or in part) but made no specific suggestions of requests for changes:

- A1X Limited
- Bike Taxi Limited
- Brake
- City Property Association
- London Living Streets
- QuarterOne
- RailFuture
- Roadpeace
- St Paul's Cathedral School
- Transport for London
- Wheels for Wellbeing

Some respondents expressed support for specific measures or highlighted particular reasons for supporting the proposal, including:

- Our minimum cycling levels of service and the associated reduction in traffic volumes
- Improving safety for cyclists
- Enabling more non-standard cycling in the City
- Using temporary infrastructure and trials to accelerate the delivery of the network
- Enabling people of all ages and abilities to cycle, including disabled people
- Improved wayfinding
- Improving the look and feel of cycling in the City to be more inclusive of those wishing to cycle but currently do not

89 people and the following organisations expressed their support for one or more elements of the proposal but had concerns, recommendations, or needed clarification regarding other elements of the proposal, which are covered in the table below:

- **COLAG** was supportive of the inclusion of accessible and adaptive cycles
- The **Confederation of Public Transport** was supportive of providing safer environments for cyclists and accepted the need to reallocate space to cyclists for this
- The **Federation of Small Businesses** supported in principle our traffic reduction efforts
- **IAM Roadsmart** was supportive of encouraging more people to cycle in the City

- The **London Tourist Coach Operators** broadly supportive of the entire proposal
- The **London Taxi Drivers Association** were supportive of designated, segregated space for cycling
- **Stop Killing Cyclists** was supportive of the retention of all Cycle Superhighways

General expressions of opposition

34 people and the organisations listed below expressed their opposition for this proposal (in full or in part) but made no specific suggestions of requests for changes.

- The **Alliance of British Drivers** opposed keeping vehicle volumes below certain levels and did not believe there should be a hierarchy of transport mode provision
- **Greater London MAG** did not support contraflow lanes and had general concerns around empty cycling infrastructure

Some respondents highlighted particular reasons for opposing the proposal including;

- Cycling is not a mode we should support or encourage
- People shouldn't be forced into cycling
- There is already enough cycling provision
- People cycling are all affluent young white males and prioritising them over pedestrians is unethical
- People cycling are the most dangerous road users

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
Requests to go further in designing and delivering the Core Cycle Network	<p>Accelerate the delivery of the Core Cycling Network</p> <p>We received 100 comments from people who felt that our timescales of 2030 and 2044 were unambitious and urged the City Corporation to adopt earlier target dates for the completion of Phase 1 and 2 of the cycling network.</p>	The Transport Strategy currently aims to have five sections of the core cycle network by 2030, and states that we will explore the potential to use temporary measures and interventions to accelerate the pace of delivery wherever possible.

	<p>More ambitious delivery dates were also requested by CPA NextGen, Salix Finance, SkKC Stop Killing Cyclists and Systra</p> <p>In addition, over 1500 people used a Square Mile Cycling template response to request, in addition to the existing network (including the CSH on Upper and Lower Thames Street), that:</p> <ul style="list-style-type: none"> • an east-west protected cycle route from Aldgate to Blackfriars via Bank Junction take priority when delivering the Core Cycle Network • we adopt a more ambitious timescale for delivering the Core Cycle Network <p>We received 5 comments and 517 template email responses via the Unblock the Embankment website suggesting that the existing protected cycleway Cycle Superhighway on Upper and Lower Thames Street should be replaced by the Aldgate to Blackfriars route proposed in the Transport Strategy in Proposal 24. The template mirrored the formal Unblock the Embankment response.</p> <p>Request for more ambitious traffic reduction levels or standards</p> <p>We received 26 comments encouraging the City go further in reducing traffic. In addition, some commenters called for traffic reduction not just on Core Cycle Network streets but on all streets across the City. Commenters stressed the benefits of reducing traffic, which included:</p>	<p>Recognising people's concerns around pace we will make a change to Proposal 24 to modify the delivery of the Core Cycling Network. Phase 1 will be split into Phase 1a and 1b, with sections of the Phase 1a network will be delivered by 2025 and Phase 1b delivered by 2030. We will also make a change to Proposal 24 to modify the final delivery target date of Phase 2 to 2035.</p> <p>This proposal outlines the proposed core cycle network for the Square Mile, which builds on existing strategic cycling network connections in central London and aims to create a network of safe, attractive, and accessible cycle routes across the City. It also allows the existing protected cycleway along the Embankment to continue to provide a relatively quick route for the more than 10,000 people cycling through the City each day that use the route while reducing potential conflicts with the significant volumes of people walking on our streets. Given the high levels of general support for our proposal we do not intend to make any changes to Proposal 24 in response to the Unblock the Embankment request.</p> <p>Transport for London recently released its Cycling Action Plan which includes guidance stating that the design of new cycle routes should only mix people cycling with motorised traffic where there are fewer than 500 motor vehicles per hour at peak times, and preferably fewer than 200. We believe our target of 150 vehicles per hour is suitably ambitious. Therefore, we do not intend to make any changes to the strategy in response to these comments.</p>
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	<ul style="list-style-type: none"> • Less pollution at street level, improving the respiratory health of people cycling • Safer streets and lower risk of injury • A more pleasant cycling environment overall <p>In addition, the London Cycling Campaign called for a lower maximum traffic volume level in the future in line with the Dutch CROW standard, and that this be applied to Local Access Streets as well as the core cycle network.</p> <p>A small number of comments and the London Cycle Campaign called for the use of the LCDS as a minimum standard when designing our cycle network. The Federation of Small Businesses wanted to understand how we will monitor, manage, and enforce our cycling minimum levels of service.</p> <p>Request for more segregation We received 29 comments stating that building protected cycle lanes for people cycling should be prioritised either generally or over the traffic reduction measures detailed in our proposal.</p> <p>The London Cycling Campaign encouraged us to pursue full segregation as our long-term ambition for the core cycle network. They also noted that our minimum widths are likely to need review in the future as cycling volumes change. Salix Finance also stated that we</p>	<p>We will make a change to Proposal 24 to add that We will learn from and incorporate any best practice and standards, such as the London Cycling Design Standard and Dutch 'CROW', when designing and delivering cycling infrastructure improvements in the City.</p> <p>We believe that protected cycling facilities will help make the Square Mile a safer, more attractive and more accessible place to cycle. We also recognise the concerns that people have regarding more cycle lanes in the City and their impacts on other street users. We believe our current approach attempts to balance the needs of people cycling with other street users while recognising that many streets are simply too narrow for protected cycling facilities. Therefore, we do not intend to make any changes to the strategy in response to these comments.</p> <p>This proposal supports cycle logistics and the use of cycles as mobility aids by ensuring that all parts of this network are designed to be accessible to non-standard cycles, such as cargo cycles or adapted cycles. Proposal 25 also sets out our plans for improving and increasing the amount of cycle parking in the City, which includes assessing requirements for parking that can accommodate cargo cycles and adapted cycles. Therefore, we do not intend to make any changes to the strategy in response to these comments.</p> <p>We will make a change to Proposal 24 to clarify that additional measures to support the delivery of the core</p>
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	<p>should seek to deliver both an increase in cycle lanes in the City alongside a reduction in traffic volumes.</p> <p>Additional requests for improving the Core Cycle Network We received 23 comments from people who stressed that we should recognise the needs of people using non-standard cycles are different to those of standard cycles and that other measures may be needed to support them, such as kerbside cargo cycle loading bays and secure parking. Lancefield Residents noted that road surfaces should be maintained and that some speed bumps are issues for cargo bikes. IAM Roadsmart recommended that the Strategy includes plans to review the layout of its cycle reservoir approach lanes to produce a safer design.</p> <p>We also received 10 comments supporting improved wayfinding for people cycling in the City, and specifically for more signage at eye level and road markings.</p>	<p>cycle network will include enhanced cycle wayfinding and signage, including signage at eye</p>
Requests to go further in setting and monitoring our cycling growth target	<p>We received a few comments stating that our cycling growth targets were unambitious. London Cycling Campaign, Salix Finance, and Sustrans encouraged the City to set more ambitious cycling growth targets. Roadpeace also urged the City to produce annual or biannual cycle data reports.</p>	<p>We believe our goal to double our current levels of cycling are suitably ambitious given our historic growth and the fact that significant investment on routes to the Square Mile is necessary to encourage more people to choose to cycle.</p>
Concerns and oppositions to the cycle network design and delivery	<p>Opposition to and concerns regarding more people cycling and more cycling infrastructure in the City We received 36 comments in opposition to more protected cycling infrastructure in the City, with many comments related to opposing improving cycling conditions more generally or concerns around:</p>	<p>We believe that protected cycling facilities will help make the Square Mile a safer, more attractive and more accessible place to cycle. We also recognise the concerns that people have regarding more cycle lanes in the City and their impacts on other street users. We</p>

	<ul style="list-style-type: none"> • increased congestion and air pollution • negative impacts on businesses and taxis • Less safe streets and less pleasant street environment for people walking and motorists <p>We also received 39 comments regarding congestion concerns more generally.</p> <p>Greater London MAG was specifically opposed to more segregated cycle lanes. In addition, the Brewery Logistics Group expressed concerns about the congestion impacts of an expanded cycle network. Gett UK had concerns about the impacts of reallocating road space away from motor vehicles. John Lewis commented that a balance should be found that ensures that e/cargo bikes are encouraged but do not negatively contribute to congestion. The LTDA had concerns about the congestion impacts of reducing road capacity to accommodate cycle lanes and stressed that the new network should not result in a loss of taxi ranks.</p> <p>Some organisations also stressed that we should consider the merits of protected cycle facilities on each street independently, including the Brewery Logistics Group, Flit Technologies Limited, John Lewis, London Taxi Driver Association, RMT London, Unblock the Embankment.</p> <p>We received 22 comments from people who asked for further assurances that the needs of people walking will be prioritised above those of people cycling, especially when designing and delivering the Core Cycling</p>	<p>believe our current approach attempts to balance the needs of people cycling with other street users while recognising that many streets are simply too narrow for protected cycling facilities. Therefore, we do not intend to make any changes to the strategy in response to these comments.</p> <p>In addition, the Transport Strategy aims to make the City a great place to walk and spend time. Proposal 2 seeks to put the needs of people walking first when designing and maintaining our streets. This includes when designing and maintaining our core cycle network. Therefore, we do not intend to make any changes to the strategy in response to these comments.</p> <p>We recognise the need to improve the experience of people walking and cycling in shared spaces and reduce conflicts between modes. This proposal commits to reviewing all shared spaces and contraflow cycle lanes, and where necessary propose physical changes, campaigns, education, engagement and enforcement to improve interactions between people walking, cycling and driving.</p> <p>Work has already commenced on reviewing the shared space at Queen Street and we will continue to conduct these reviews at pace. Therefore, we do not intend to make any changes to the strategy in response to the comments.</p> <p>Transport for London recently released its Cycling Action Plan which includes guidance stating that the</p>
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	<p>Network. In addition, COLAG raised concerns or queries about the compatibility of our pedestrian priority policy and our core cycling network.</p> <p>We received 9 comments from people who felt that the introduction of infrastructure or priority for people cycling can mean motorcyclists have less room to filter, putting them at risk.</p> <p>Opposition to shared space/contraflow lanes We received 33 comments in opposition to shared space and contraflow lanes. These concerns were predominantly on the safety of these types of cycling facilities. Shared space on Queen Street was highlighted as a particularly challenging area.</p> <p>In addition, the Chancery Lane Association highlighted their concerns with the current contraflow cycle lane design at the southernmost end of Chancery Lane. Greater London MAG did not support contraflow lanes in the City.</p> <p>Concerns about traffic volume limits in our levels of service A small number of people were concerned about the practicality, feasibility, and impacts of our traffic volume limits in our cycling minimum levels of service.</p> <p>In addition, the Alliance of British Drivers opposed keeping vehicle volumes below certain levels. The Brewery Logistics Group had concerns around the traffic volume thresholds and its practicality, particularly</p>	<p>design of new cycle routes should only mix people cycling with motorised traffic where there are fewer than 500 motor vehicles per hour at peak times, and preferably fewer than 200. We believe our target of 150 vehicles per hour is practical, achievable, and necessary to deliver our ambition of making the City a safer, more attractive, and more accessible place to cycle. Therefore, we do not intend to make any changes to the strategy in response to the comments.</p>
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	<p>around enforcement. The Confederation of Passenger Transport questioned the need for a cycling minimum level of service when other street users do not have such minimums. IAM Roadsmart sought clarification on whether our traffic volume limits would include powered two wheelers. John Lewis stressed that we ensure that we do not restrict trade by introducing traffic limits.</p>	
<p>Concerns regarding the behaviours of some people who cycle</p>	<p>Concerns around poor cyclist behaviours and enforcement</p> <p>We received 115 comments regarding poor cycling behaviours, many of which included a request to improve the management and policing of these behaviours.</p> <p>In addition, we received 34 comments calling for the City to introduce measures to regulate cycling, including:</p> <ul style="list-style-type: none"> • A cycling registry • Mandatory cycling insurance • Enhanced cyclist testing and licensing <p>The Smithfield Market Tenant's Association and the CIC also called for cyclists to be registered, insured, and tested. The Heron Moor Lane Residents Committee also had concerns about the behaviours of people cycling and stressed that they believe cycling speeds should be no faster than walking pace.</p> <p>We received 3 comments in opposition to non-standard cycles using our streets. In addition, the Alliance of British Drivers were concerned about cargo cycle and electric cycle speeds and safety. Both the Brewery</p>	<p>Proposal 20 sets out plans for the delivery of our Safer Systems approach, of which seeking to improve street user behaviour is a core component. Raising awareness of good street user behaviour amongst all road users is the right approach to improving safety and reducing collisions and anti-social behaviour on our street network. We will deliver a series of targeted behaviour change campaigns through our Road Danger Reduction Action Plan which will include targeting the poor behaviours noted in these comments.</p> <p>We will continue to work closely with the City of London Police to ensure enforcement against dangerous behaviour from all road users is prioritised, and especially focused on those users which pose the greatest risk on our streets.</p>

	<p>Logistics Group and John Lewis were generally supportive of cargo cycles but had concerns about delays and impacts from using more cargo cycles.</p>	
<p>Other requests to change the proposal</p>	<p>Opposition to aggressive and inconsiderate motoring and improving training for minimising risk to people cycling</p> <p>We received 26 comments on aggressive motoring in the City, many of which included a request to improve training for people driving cars, taxis, and goods vehicles. Specific requests included:</p> <ul style="list-style-type: none"> • Improved training on cycling awareness, techniques like the Dutch Reach • More enforcement and policing against illegal and unsafe behaviours • Refresher training for older drivers <p>We also received 6 comments regarding vehicles obstructing cycle lanes and the need to improve enforcement of illegal kerbside activity.</p> <p>We received 31 unique comments calling for the proposal to encourage and prioritise the use of powered two wheelers to reduce congestion and pollution. These comments made no direct comments on the proposal but stated their support for powered two wheelers.</p>	<p>Proposal 14 in the strategy sets our plans for making the best and most efficient use of kerbside space. We propose identifying opportunities to reduce obstructions caused by vehicles loading or waiting to pick up passengers, particularly on bus and cycle routes and at peak travel times. Therefore, we do not intend to make any changes to the strategy in response to the comments.</p> <p>Comments related to vehicles obstructing cycle lanes have been responded to above in the section on Proposal 14.</p> <p>We recognise that there is a positive role for powered two wheelers for certain journeys where a non-motorised or public transport alternative is not available. In these instances, travelling by powered two-wheeler is likely to have a lower impact on congestion and pollution than using a private car. However, there is limited potential for modal shift to powered two-wheeler from private cars, taxis and private hire vehicles. Actively encouraging travel by powered two wheelers may also result in some shift away from walking, cycling and public transport (93% of commuter travel).</p> <p>As a result, we will not be actively encouraging travel by powered two wheelers but will undertake further analysis to understand their use and potential, both private and</p>

		commercial, before implanting any proposals that might discourage their use or negatively impact on current users.
Other organisational comments	<p>The Barbican Association stated that we should provide guidance to adult scooterists on our streets and pavements.</p> <p>Cross Regional Partnership recommended that the proposal consider alternative forms of transport like push trolleys and carts.</p> <p>The London Tourist Coach Operators stated that we should ensure impacts on coaches are taken into account when developing individual schemes.</p> <p>The MCIA supported allowing lightweight P2W on Cycle Superhighways at off-peak times.</p>	<p>We note all comments and suggestions.</p> <p>Additional guidance to adult scooterists will be included in future updates to our Road Danger Action Plan. Alternative forms of transport and coaches are considered more broadly throughout the strategy when relevant. We are not currently planning on allowing lightweight P2Ws on cycle lanes in the City.</p>

Proposal 29: Support and champion a central London Zero Emission Zone

General expressions of support

275 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- | | | |
|---------------------------------------|-----------------------------|--|
| • Railfuture | • City Property Association | • AWT Investments Limited |
| • Stop Killing Cyclists | • City Property Association | • Skc |
| • Brake | NextGen | • The Heron, 5 Moor Lane,
Residents Committee |
| • Bike Taxi Ltd | • Transport for London | • Wheels for Wellbeing |
| • Living Streets | • CIC | • Ramblers Inner London Area |
| • Port of Tilbury London Ltd | • Lancefield St residents | • Quarter One |
| • Systra | • Roadpeace | • Flit Technologies Limited |
| • SALIX | • Flit Technologies Limited | |
| • Barbican Association –
Residents | • A1X Limited | |
| | • TheTin Ltd | |

The following organisations expressed general support but also made suggestions or highlighted concerns which are addressed in the table below.

- **City of London Access Group (COLAG)** raised the issue that there is a very limited range of electric vehicles which meet the requirements for some disabled drivers and that there are currently no hybrid or electric vehicles available for people requiring wheelchair accessible vehicles.
- **St Paul's Cathedral School** would welcome inclusion of additional zero emission streets or zone around St Paul's Cathedral.
- **The London Taxi Driver Association (LTDA)** support the proposal but would like to see a temporary exemption for taxis while the trade transitions to zero emission capable taxis.
- **Stop Killing Cyclists, Brake and Bike Taxi Ltd**, noted that the introduction of Zero Emission Zones needs to be complemented by overall traffic reductions as zero emission capable vehicles still contribute to particulate matter produced by tyre and brake wear as well as congestion and road danger.
- **London Tourist Coach Operators Association (LTCOA)** expressed concern that zero emission coaches are still in their infancy with much of the technology either untested or not yet tested to an extent that proves its robustness. LTCOA would

welcome further discussion to explore the potential need for a compromise that minimises the impact on the coach industry while still supporting overall emission reductions.

- **Freight Transport Association, Royal Mail and Federation of Small Businesses** all expressed interest in the detail and a willingness to work with City of London Corporation to help deliver a workable ZEZ.

General expressions of opposition.

56 people expressed their opposition for this proposal (in full or in part) and made no specific suggestions or requests for changes. 5 people thought that the motivation proposals was for raising 'tax' through fines for non-compliant vehicles rather than genuinely for air quality improvements

The following organisations expressed general opposition but also made suggestions or highlighted concerns which are addressed in the table below.

- **Motorcycle Action Group (MAG)** oppose the introduction of ZEZ on the grounds of confusion and undemonstrated cost/benefit of introducing higher emission standards than those required by the wider 2019 ULEZ. They are also concerned that this is changing the targets, as they feel people will upgrade to meet ULEZ 2019 requirements and that to go further in a short space of time is unreasonable. MAG also suggested the transition to zero emission capable vehicles should be market led and that fines/upgrades of vehicles would have a greater impact on lower income groups.
- **Alliance of British Drivers (ABD)** contest the need for a ZEZ on the grounds that air pollution is not as damaging as the evidence suggests and that it is unnecessarily costly. ABD argued that diesel buses and HGVs are the biggest contributors to poor air quality and there is no effective alternative to them.
- **La Fromagerie** noted that no ZEC refrigerator vans are currently available.
- **Smithfield Market Tenants' Association** noted that no ZEC HGVs will be available within the next 5 years.

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
<p>Support the proposal but request that it go further (106 comments)</p>	<p>48 people suggested the local ZEZs should cover a wider area or that vehicles should be banned completely. St Paul's Cathedral School and a number of individual respondents asked for the area around St Paul's to be a ZEZ, highlighting the health impacts of air pollution on children.</p> <p>29 people thought the proposal for local ZEZ should be implemented earlier than 2022, citing poor air quality and health impacts as the reason for faster action.</p> <p>Tyre and brake wear 22 people as well as Stop Killing Cyclists, Brake and Bike Taxi Ltd highlighted the need to reduce particulate matter from tyre and brake wear alongside exhaust emissions.</p> <p>Whole-life emissions A few people also raised the point that whole life emissions of vehicle replacement should be factored in, noting that there are emissions at production stages, others noted that the availability of battery making materials could be a challenge in the future.</p> <p>Reduce non-vehicle emissions. 16 individuals and the following organisations expressed concern that we need to also be addressing emissions</p>	<p>The timescale proposed for 2022 implementation is considered appropriate given the need for engagement, challenges of implementation, vehicle availability and the need to consider access requirements.</p> <p>The proposal to introduce two local ZEZs, where covering areas of the Square Mile with the greatest concentrations of people working and living, is anticipated to deliver benefits from reduced vehicle pollution across the Square Mile, as the routes to ZEZs will have a greater proportion of ZEC vehicles. As we develop these zones, we will consider the possibility of other areas or extensions.</p> <p>We recognise the need to reduce particulate matter from tyre and brake wear. This will be in part addressed by proposals to proactively reduce the number of motor vehicles in the Square Mile. Proposals to encourage safe speeds and behaviours as part of Vision Zero will result in slower speeds and less aggressive braking should also reduce tyre/brake wear.</p> <p>Electric vehicles are for more efficient in fuel use/CO2 output than combustion engines. The wider need to reduce the use of fossil fuels is set out in the City of London Responsible Business Strategy and the City Corporation has agreed to a renewable energy policy for</p>

	<p>from fossil fuels at power stations, where these would still be the source of the power supply.</p> <p>A number of people raised the point of needing to deal with emissions associated with uses other than transport, including emissions from non-road mobile machinery (NRMM) used by the construction industry.</p>	<p>its own direct use. Measures to reduce emissions from NRMM are set out in the City of London Air Quality Strategy.</p>
<p>Potential exemptions and ZEC vehicle availability (95 comments)</p>	<p>Exemptions for residents and freight 31 people, mostly residents, and the Barbican Association, raised the need for exemptions for residents who may not be able to switch to fully electric vehicles by 2022 and still require vehicles for essential journeys. Respondents noted that residents only use vehicles infrequently and do not make a significant contribution to emissions. Residents also expressed concern about taxis access, particularly for disabled residents, and access restrictions on deliveries and servicing, such as plumbers and electricians.</p> <p>Exemptions for motorcycles and mopeds 40 people suggested that motorcycles and mopeds should be exempt from any restrictions as they are lower emission than other vehicles.</p> <p>Exemptions for taxis 3 people, the RMT and the LTDA suggested that taxis should be exempt from restrictions as they need to access all areas, are fully accessible and that the taxi trade is already transitioning to ZEC taxis. Some</p>	<p>We recognise the need to take account of the needs of residents and the availability of ZEC vehicles when developing and implementing ZEZs. The need to consider phasing for vehicle class/type and possible exemptions for certain users is reflected in the current drafting of this proposal and will be considered during the development of local ZEZs. Residents, businesses, the freight industry and other street users will be engaged as part of this process.</p>

	<p>respondents also suggested that those drivers who had invested in ZEC taxis should be given some priority within ZEZs such as dedicated ranks</p> <p>3 comments expressed an alternative view, suggesting that taxis should not be exempt for ZEZ restrictions, as older vehicles are particularly bad on vehicle emissions.</p> <p>Vehicle availability 18 people and range of organisations raised concerns about the availability of zero emission capable vehicles. The LTCOA noted that zero emission coaches are still in development. Freight Transport Association , Freight Traffic Control 2050 , Smithfield Market Tenants' Association and Thames Tideway and La Fromagerie expressed concern that there is still a very limited amount of choice for HGV and LGVs that will meet the requirements. SMMT and the Federation of Small Businesses suggested that introduction of ZEZ should be in line with commercial availability of vehicles. Royal Mail note that they would welcome early engagement on proposals so that service needs can be met effectively and avoid unintended consequences of additional vehicles being required.</p>	
Financial impacts on businesses and individuals (58 comments)	<p>The need for subsidies or price equality 29 people suggested that further subsidy is required to enable a shift to EVs, or that implementation of any further restrictions should be delayed until there is price equality for EVs.</p> <p>People on low incomes (27 comments)</p>	<p>Grants and financial incentives are available through the Office of Low Emission Vehicles and TfL. The market for small goods vehicles, taxis and private cars is becoming established and for some vehicle types purchase cost will soon be equal to equivalent petrol/diesel vehicles. (expected to be reached by 2020). The operating costs of electric vehicles are notably lower than those of petrol/diesel at present.</p>

	<p>27 people and MAG raised concerns that the need to upgrade vehicles or pay a fine for vehicles not meeting new requirements will unfairly impact on people on low incomes.</p> <p>Others commented that this proposal effectively allows preferential treatment for those who could afford to pay. Some people thought this should therefore mean a complete ban on vehicles not meeting the requirements rather than fines which allow people to 'pay to pollute'; others thought it should be managed by complete bans of all vehicles, not permitting EVs either.</p> <p>Let market lead; allow more time for transition to EVs</p> <p>2 people and MAG suggested that the transition to zero emission capable vehicles should be market led. A number of other respondents suggested that the implementation of ZEZ restrictions should be delayed due to the costs and availability of replacement vehicles. Motorcycle Action Group and the ABD do not support a ZEZ, London wide or local zones, particularly by 2022. Their view is that this should be allowed to happen with the market, and not accelerated. They do not see a valid case in cost/benefit terms of the cost to motorists against the health benefits.</p>	<p>Comments referring to the low-income groups were mostly relating to residents and will be addressed during the development of the ZEZ, for example through 'sunset' periods that provide time limited exemptions to residents.</p> <p>The mechanisms to manage access mean that it is likely to be necessary to impose fines on offending vehicles. Consideration of what level this should be at to reduce infringements to a minimum will be part of the full feasibility study prior to implementation.</p> <p>The Square Mile, as well as many other parts of London, is still in breach of air quality targets that should have been met by 2005 for PM10 and 2010 for NO2 (EU regulations). The market is not delivering new vehicles at a rate deemed necessary from a health perspective, recognised by UK, EU governments and World Health Organisation.</p> <p>The case in health terms has been made at a respected professional level internationally.</p>
EV charging infrastructure (34 comments)	<p>34 people stressed the need to provide EV charging infrastructure to support the introduction of Zero Emission Zones.</p>	<p>This is addressed in <i>Proposal 30, Install additional electric vehicle charging infrastructure.</i></p>

Proposals should target worst polluters (23 comments)	23 people commented that diesel buses, taxis and HGVs are the worst polluters and that the proposal should be concentrating on these, rather than a blanket approach for all vehicles.	Reductions in emissions from all types of vehicle will be required to meet air quality targets. TfL have set out a timetable for the transition to ultra-low and zero emission buses and taxis, which is being delivered through contract and licencing requirements. Currently there is a lack of alternative vehicles for HGVs but the Transport Strategy includes proposals to reduce the number of motorised freight vehicles in the Square Mile.
Relationship with central London ULEZ 2019 and neighbour boroughs. (5 comments)	<p>A small number of people and MAG questioned the need from restrictions that go beyond those being introduced as part of the central London ULEZ in April 2019.</p> <p>Brewery Logistics Group, Freight Traffic Control 2050, John Lewis Partnership and SMMT highlighted the need for a consistent approach between the City and neighbouring boroughs, or across London, when implementing any local ZEZ restrictions. TfL recommended that the City of London refers to forthcoming guidance when preparing its future proposals.</p>	<p>Modelling has shown that the air quality on our busiest streets will still be in breach of the UK and WHO health-based limits after the introduction of the ULEZ in April 2019.</p> <p>The risk of confusion and need for consistency is recognised and addressed in the proposal. We will work closely with neighbouring boroughs, London Councils and TfL to ensure a consistent approach.</p>
Will redistribute pollution elsewhere (5 comments)	5 people thought that vehicles avoiding a ZEZ would increase pollution elsewhere, with no net benefit.	Given the scale of the local ZEZs proposed we do not think that there will be a redistribution of traffic.

Proposal 38: Reduce the number of freight vehicles in the Square Mile

General expressions of support

129 people and the organisations listed below expressed their support for this proposal (in full or in part) but made no specific suggestions of requests for changes.

- City Property Association (CPA)
- Chancery Lane Association (CLA)
- Cross River Partnership (CRP)
- Freight Traffic Control 2050 (FTC 2050)
- IAM Roadsmart
- Landsec
- London Tourist Coach Operators Association (LTCOA)
- Port of London Authority (PLA)
- Port of Tilbury
- Railfuture
- RMT London Taxi Branch
- Roadpeace
- Stop Killing Cyclists
- Transport for London (TfL)
- Wheels for Wellbeing

Some respondents expressed support for specific measures or highlighted particular reasons for supporting the proposal, including:

- Retiming
- Last Mile Logistics/Cargo Cycles/deliveries made on foot
- More freight delivered by river
- Consolidation
- More freight delivered by rail
- Safety benefits of fewer and retimed freight vehicles

Conditional/specific support

The following organisations expressed support for proposal but with some exceptions or need for clarification which are listed in the table below:

- Aldgate Partnership
- Confederation of Passenger Transport (CPT)
- Barbican Association
- Federation of Small Businesses (FSB)
- Flit Technologies Limited
- Freight Transport Association (FTA)

- Motorcycle Action Group (MAG)
- Motorcycle Industry Association (MCIA)

- Road Haulage Association (RHA)

General expressions of opposition

34 people expressed their opposition for this proposal (in full or in part) but made no specific suggestions or requests for changes. The following organisations were not supportive of this proposal:

- Alliance of British Drivers (ABD)
- La Fromagerie
- Smithfield Market Tenant's Association
- Unblock the Embankment

The campaign group **Unblock the Embankment** opposes the proposal on the basis that it will result in increased traffic on the A3211 (Victoria Embankment and Upper and Lower Thames Streets). 500 template emails were received via the Unblock the Embankment website. The template mirrors the Unblock the Embankment response and concern that delivering this proposal will lead to increased congestion on the A3211.

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
Opposition or concern related to specific measures (91 comments)	<p>45 people were unsupportive on grounds that the proposals would increase costs to City businesses and/or others in the supply chain, such as suppliers, hauliers and couriers. The themes in these comments included:</p> <ul style="list-style-type: none"> • General concern for increased costs • Increased costs to do business will make the Square Mile less competitive 	<p>We agree that City occupiers, residents and the freight industry should not be forced to burden increased costs to receive deliveries. Furthermore, it is not our intention to introduce inefficiencies into already highly effective last mile supply chains or stop businesses from receiving their deliveries. We will target different businesses and goods type with the most appropriate measures of proposal 38.</p>

	<ul style="list-style-type: none"> • Concern it would lead to goods shortages • Additional staff requirements to facilitate retiming, particularly for properties that are not currently open long hours <p>The ABD suggested that the proposal would burden freight operators with cost whereas CIC commented that costs would burden City businesses. The FSB expressed concern that a financial impact assessment must be undertaken and if it makes deliveries more expensive, they could not support the proposal. This position was echoed by the FTA, who wanted clarification on how consolidation schemes will work, who will pay, what the impacts will be and that businesses are engaged with at the earliest opportunity and would not support area wide consolidation. It was also suggested that not all goods are suitable for consolidation and this view was shared with the RHA, John Lewis Partnership, Smithfield Market Tenants' Association and La Fromagerie.</p> <p>35 people did not support the proposal due to it being over ambitious or not workable for City businesses or the supply chain. Reasons given include:</p> <ul style="list-style-type: none"> • Businesses need goods at all times of day to operate • Costs will be passed on to consumers of goods in the City • Last Mile Logistics Hubs will cause problems for people who live near them 	<p>We are working to identify cost neutralising measures when using a consolidation centre. This will calculate the benefits to internal portage, distribution and reduced impact on our post rooms to identify offset costs. The outputs of this will be used as best practice when launching our consolidation service by 2022.</p> <p>We will update the proposal to clarify that the individual actions of the proposal will not be uniformly applicable to all businesses and freight activity in the Square Mile and the requirement of commercial sustainability of interventions.</p>
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	<ul style="list-style-type: none"> • Doesn't integrate into logistics supply chain • Impractical and unrealistic targets • Cargo cycles are not practical <p>22 commenters did not support this proposal as City businesses need deliveries to operate and the actions in this proposal would stop some deliveries from being made.</p> <p>We received 11 comments concerned with the impact of retiming deliveries on residents. This was also a concern for the Barbican Association, who were specifically concerned with our wording that impacts would be 'negligible'. They state that this is not quantifiable and still a negative impact.</p> <p>UPS, whilst supportive in principle, noted that a lot of the deliveries they make are timed for the convenience of the customer and that City occupiers both need and mandate deliveries in the morning peak.</p>	
Support and go further/not ambitious enough (86 comments)	<p>37 people suggested that we should go further in seeking to retime freight by banning peak vehicles and/or deliveries altogether. These comments suggested varying bans, including:</p> <ul style="list-style-type: none"> • AM peak ban • AM and PM peak ban • 7am – 7pm ban • Ban vehicle types at specific times e.g. HGVs in the morning peak. 	<p>We do not believe that it is either possible or appropriate to ban either deliveries or types of freight vehicles from the Square Mile at certain times of day as it would have a major impact on City occupiers, developers and the wider freight industry.</p> <p>Many of these commenters were specifically interested in targeting HGV traffic, either with a ban or with further reductions or restrictions. HGVs over 18 tonnes are subject to the London Lorry Control Scheme, which presently restricts hours of operation</p>

	<p>The need to either directly target the larger vehicles, usually identified as HGVs or more specifically construction and waste vehicles, was noted by 27 commenters.</p> <p>22 commenters didn't think the proposal was ambitious enough more generally, either citing the greater reductions in vehicle numbers required or the need to bring the targets forward. This was echoed by Sustrans, who requested we bring our targets for reduction forward through maximising the opportunities of consolidation and cycle logistics</p> <p>25 people requested increasing delivering the proposed measures faster.</p>	<p>on restricted roads (which includes all the Square Mile) to 7am-9pm. The need to modernise this scheme is in the strategy as doing so will facilitate more HGV movements outside of peak hours.</p> <p>We think that we have set significant and ambitious targets for reducing and retiming motorised freight vehicles in the Square Mile. For example, the Mayors Transport Strategy, TfL target a 10% reduction in AM peak freight vehicles in central London by 2026 whereas we are targeting 15% at all times of day by 2030. We will review and update the strategy every five years and if appropriate set more ambitious targets with faster delivery.</p> <p>We will not change proposal 38 to reflect these comments.</p>
Other organisational responses	<p>The Aldgate Partnership were supportive of the proposal subject to the impacts on areas outside the City.</p> <p>The CPT were supportive if coaches were not part of any restrictions to HGV goods vehicles in this proposal.</p> <p>Flit Technologies Limited were supportive and suggested using empty running taxi and private hire vehicles for ad hoc freight deliveries.</p> <p>FTC 2050 are supportive but requested more details of the targets, specifically whether we are looking at</p>	<p>We will consider the origin and destination of goods when location a consolidation centre to minimise any additional impacts to surrounding areas.</p> <p>Coaches are a different vehicle classification to heavy goods vehicles and would not be restricted in freight schemes</p> <p>We welcome any innovations to reduce the empty running of taxi and private hire vehicles and would seek to work with such a company as part of our Future Transport Programme.</p>

	<p>reducing vehicle numbers or kilometres and what constitutes a motorised freight vehicle.</p> <p>MAG and MCIA suggested adding powered two wheeled vehicles in last mile logistics hubs</p> <p>The PLA supported greater river freight and requested wording reflects their Air Quality Strategy for river operations. The Port of Tilbury were also supportive of river freight and requested to work with the City to best achieve consolidation.</p> <p>TfL noted that to achieve our retiming targets there would need to be a significant overhaul of the London Lorry Control Scheme.</p> <p>Unblock the Embankment expressed concern that this proposal would increase congestion on the A3211. This concern was also included in the 500 template emails sent via the Unblock the Embankment website.</p>	<p>Whilst we recognise the request for use of motorcycles in last mile logistics hubs, this has not been put forward as an option by the freight industry. We will review opportunities for powered two wheeled vehicles should they come forward</p> <p>We note the PLA's request and will update the document to reflect their Air Quality Strategy.</p> <p>We note the request of the Port of Tilbury.</p> <p>We agree with the TfL comment that the London Lorry Control Scheme needs a significant overhaul, and this is already included in the proposal</p> <p>This proposal will reduce the number of freight vehicles travelling to and from the Square Mile and will not increase traffic on the A3211.</p>
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Proposal 41: Reduce the impact of construction and streetworks

General expressions of support.

223 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Brewery Logistics Group
- Barbican Association – Residents
- City of London Access Group
- Bike Taxi Ltd
- Living Streets
- Thames Tideway
- IAM
- Federation of Small Businesses
- Sustrans
- TfL
- Wheels for Wellbeing
- London Tourist Coach Operators Association
- The Heron, 5 Moor Lane, Residents Committee
- Skc
- The Tin Ltd
- A1X Limited
- QuarterOne
- Flit Technologies Limited
- Cross River Partnership (CRP)
- RoadPeace
- Lancefield St Residents
- CIC
- FXpansion Audio UK Ltd.
- The Aldgate Partnership
- Ramblers Inner London Area

Respondents expressed support for the measures including specific comments:

- That much higher penalties for overrunning works should be introduced.
- To provide better notification of diversion routes including notices for pedestrians and cyclists; on-line maps for bus redirections
- That night time working should be maximised to shorten construction periods.
- That more could be done to provide underground services on a comprehensive approach, for utilities etc. with ducting.

59 people supported the proposal but made comments that coordination of street works should be current practice, or expressed that any better coordination was very unlikely to be achieved given the complexity of different agencies involved.

A few people commented on the amount of disruption due to constant building works and challenged whether Planning Policy should permit so much development.

The following organisations expressed their support for the proposal but with some exceptions that are addressed in the table below:

RMT partly support this proposal but consider that taxis should at least be afforded the same priority/access rights as buses.

John Lewis Partnership support this proposal but would like freight and servicing vehicles to be given a higher priority than they have in the proposal.

MAG support this proposal in principle, but concern that pedestrians are given higher priority than is necessary.

General expressions of opposition.

6 people expressed their opposition to the proposal (in full or in part) but made no specific suggestions or requests for change.

7 people commented that they didn't think there was a problem, that some disruption is inevitable.

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
Concern of impact on residents (7 comments)	People expressed concern that the measure to allow extended night time working could have a negative impact on residents.	The proposal has been updated to make clear that existing measures to protect residents from noise disruption will continue to apply. These are set out in the City of London code of practice: Minimising the Environmental Impact of Streetworks, and City of

		London code of practice: for deconstruction and construction.
Hierarchy for traffic management plans	<p>Greater London MAG think that pedestrians are given a higher priority than necessary.</p> <p>RMT consider that taxis should have the same priority as buses;</p> <p>John Lewis Partnership request that freight should be given a higher priority</p>	The hierarchy has been amended to reflect the comments relating to taxis and freight.

Proposal 43: Establish a Future Transport Programme

General expressions of support

67 people and the organisations listed below expressed their support for this proposal (in full or in part) but made no specific suggestions of requests for changes:

- Barbican Association
- Brake
- Cross River Partnership
- Citymapper
- Confederation of Passenger Transport
- Motorcycle Action Group
- London Living Streets
- Living Streets
- London Tourist Coach Operators
- RailFuture
- Roadpeace
- Society of Motor Manufacturers and Traders
- Stop Killing Cyclists
- Sustrans
- Systra
- Moor Lane Residents Committee
- Tideway

Some respondents expressed support for specific measures or highlighted particular reasons for supporting the proposal, including:

- The need to be proactive in planning for and incorporating emerging transport technologies and innovations into the Strategy
- Developing a clear set of golden rules that can be used to support the rest of the Strategy
- Setting out a broad vision for the role of Connected and Autonomous Vehicles (CAVs) in the Strategy

The following organisations expressed their support for one or more elements of the proposal but had concerns, recommendations, or needed clarification regarding other elements of the proposal, which are covered in the table below:

- **RMT London** were somewhat supportive, and specifically supported when apps can be used to inform people about taxi-related information

General expressions of opposition

23 people and the **Brewery Logistics Group** expressed their opposition for this proposal (in full or in part) but made no specific suggestions of requests for changes.

Some respondents highlighted particular reasons for opposing the proposal including;

- Added bureaucracy
- The perceived impracticality of the proposal overall
- General opposition to technology
- Scepticism over how well the City can respond to innovation and disruption in transport

In addition, we received 31 comment supporting elements of other proposals and 53 comments opposing elements of other proposals or in general opposition to the entire Strategy. We also received 13 comments regarding problems with public transport, including overcrowding, reliability, and connectivity.

Concerns and suggestions

Comment group/theme	Comments summary	Response/commentary
Requests to go further in developing and delivering the programme	<p>We received 22 comments requesting we go further in developing and delivering the Future Transport Programme. These requests included:</p> <ul style="list-style-type: none"> • Working with additional partners such as local government • Looking internationally for best practice • Launching sooner and committing to more trials and strategies • Ensuring more citizen participation • Supporting existing modernisation activities in London, particularly those related to vehicle fleets and taxis 	<p>We recognise there is significant potential for new technologies to improve the City's streets. The Future Transport Programme seeks to capture this potential while being focussed and targeted in its activities and trials. We will make changes to the proposal to reflect the desire for us to go further in developing and delivering the programme.</p>

	<ul style="list-style-type: none"> • Being more ambitious with programme delivery more generally <p>CPA NextGen stated that shared transport should be incentivised, and that traditional transport means such as Black Cabs could be re-adapted to modern technologies. They also highlighted that technology can be used to improve communication with business and residents, particularly regarding roadworks, and that legislation will be needed to help support the programme and industry more widely. The Federation of Small Businesses stressed that SMEs and the freight and logistics sectors must be included in the programme. Flit Technologies Ltd suggested the City develop an app for taxi and private hire services in the City and move towards developing wider Mobility as a Service solutions.</p>	
Specific concerns regarding programme details	<p>We received 33 comments with specific concerns about the details of the Programme. These included:</p> <ul style="list-style-type: none"> • The potential to exclude disabled people through delivering this programme • Vested interests and conflicts of interest when working with industry partners <p>The overall “vagueness” of the programme We also received 49 comments requesting the programme do more to support powered two wheelers in the City.</p> <p>COLAG welcomed specific references to disabled people in the proposal and believed there was scope for bolder statements referring to Proposal XX and the inclusion of references to users with sensory</p>	<p>Proposal 43 states that future transport innovations will only be appropriate for trial and use in the City context if they support the delivery of Healthy Streets and adhere to a set of requirements. While those requirements include accommodating every user, especially those requiring wheelchairs or mobility aids when innovations and technologies incorporate motor vehicles, we acknowledge that we can go further in ensuring disabled people aren’t excluded from future transport solutions. We will make a change to the proposal to add an 11th requirement (which will be numbered as requirement 3) as follows: 3. Ensure that all users, especially the disabled and impaired, are accommodated and that no street user is excluded for any reason.</p>

impairments. **Wheels for Wellbeing** encouraged further work on ensuring that discussions about future transport technologies include disabled users and voices.

The **MCIA** noted there were no references to emerging PLV technologies in the proposal.

Encouraging greater use of powered two wheelers was We recognise that there is a positive role for powered two wheelers for certain journeys where a non-motorised or public transport alternative is not available. In these instances, travelling by powered two-wheeler is likely to have a lower impact on congestion and pollution than using a private car. However, there is limited potential for modal shift to powered two-wheeler from private cars, taxis and private hire vehicles. Actively encouraging travel by powered two wheelers may also result in some shift away from walking, cycling and public transport (93% of commuter travel).

As a result, we will not be actively encouraging travel by powered two wheelers but will undertake further analysis to understand their use and potential, both private and commercial, before implanting any proposals that might discourage their use or negatively impact on current users.

We acknowledge the concerns some people had around vested interests when partnering with industry to deliver the Future Transport Programme. These concerns are further addressed in our response to Proposal 44, where we have chosen to better incorporate users and the public into the Future Transport Advisory Board.

We recognise that some people felt Proposal 43 was too vague or lacked substantial detail. This was intentional, as we are not yet certain about what future technologies will have a positive impact on our streets. However, we

		will make a change to the proposal to clarify that a Future Transport Programme Action Plan will be developed in consultation with the Future Transport Advisory Board (Proposal 44) and published by mid-2020.
Concerns and opposition to the overall direction of the programme	<p>We received 11 in opposition to the general direction of the programme and of emerging transport technologies. These included specific opposition towards connected and autonomous vehicles (CAV) and drones,</p> <p>Bike taxi Limited noted that AVs must be able to react safely to people walking and cycling, and that they would not support their introduction if this is not the case. Brake highlighted that the development of CAVs must not come at the cost of space for people walking and cycling and supported measures to support improvements to vehicle safety technologies.</p> <p>We also received 12 comments highlighting the need to explicitly prioritise public transport alongside walking and cycling</p>	<p>Disruptive technologies, such as Uber, have already demonstrated their ability to rapidly change how people travel. They have also highlighted the potential negative impacts of these changes, leading to more motor vehicles on London's streets. We recognise people's concerns and opposition to some future transport technologies like CAVs and drones but believe we need to be ready to respond to these innovations and disruptions to support the successful implementation of the strategy.</p> <p>We recognise the need to encourage public transport use and will make a change to the proposal to clarify this.</p>
Other organisational comments	<p>The Port of Tillbury stated we should consider end-to-end business freight planning to maximise the sustainability of river-based and consolidated logistics.</p> <p>The Alliance of British Drivers had general concerns around the added bureaucracy the proposals in this outcome would create.</p>	We note these comments.

Appendix 3: Changes to Transport Strategy key proposals

Proposal 2: Put the needs of people walking first when designing and managing our streets.

We will ensure that the needs of people walking are prioritised by:

- Applying the Healthy Streets Approach (Proposal 1) and considering the needs of people walking first when delivering changes to streets
- Accepting that delivering priority for people walking may result in delays or reduced capacity for other street users, while seeking to minimise the impact on essential traffic through general traffic reduction (Proposal 11)
- Increasing the number of pedestrianised or pedestrian priority streets from 25 kilometres at present, to 35 kilometres by 2030, and aiming for at least 50% (by length) of streets to be pedestrian priority by 2044
- Making streets easier to cross and giving people on foot greater priority at the entrances to side streets
- Widening pavements to provide more space for people walking, with the aim that all pavements will have a minimum Pedestrian Comfort Level of B+

Key walking routes

We will prioritise improvements to junctions and routes that are busiest with people walking and where pavement width and pedestrian crossings are inadequate for current or forecast demand. Improvements to the following routes and junctions will be delivered by 2030 to make walking quicker, safer and more comfortable, with the completion of Globe View (2020) and changes to Bank Junction (2022) being implemented first:

- The area around Moorgate and Liverpool Street Stations (including Moorgate/London Wall junction) and the routes between these stations and key destinations, including the City Cluster, Culture Mile and Bank
- Bank Junction and streets between the junction and the City Cluster
- To support Culture Mile and coincide with the opening of the new Museum for London and proposed Centre for Music:
 - The route from the Millennium Bridge to Culture Mile, including changes to St Paul's Gyratory
 - The route between the Barbican and the new Museum for London, including Beech Street and Long Lane
- Fleet Street, including potential further changes to Ludgate Circus (in partnership with TfL)
- The Bishopsgate corridor, including Monument junction (in partnership with TfL)
- The Globe View section of the Riverside Walkway

Pedestrian priority streets

New pedestrian priority streets will be introduced across the Square Mile. The initial focus for introducing pedestrian priority streets will be within the City Cluster and Culture Mile. We will also identify opportunities to introduce pedestrian priority on streets with a pavement width of less than two metres.

An indicative map of these streets is shown below. We will use traffic orders, temporary measures to change the look and feel of streets and signage to accelerate delivery of pedestrian priority streets in advance of permanent changes.

Pedestrian priority streets will ~~be allow~~ access ~~only~~ for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The access requirements for each pedestrian priority, fully pedestrianised or timed pedestrianised street will be fully assessed as part of the project delivery process. The use of pedestrianised streets by cycles will be decided on a case-by-case basis to ensure people walking and cycling feel safe and comfortable. Pedestrian priority will be supported by design measures to encourage slow and courteous driving and riding.

Pedestrian crossings

We will work with Transport for London to make it easier for people walking to cross streets by reviewing all signalised pedestrian crossings with the aim of:

- Reducing the amount of time people wait for a green man, initially to a maximum of 60 seconds, followed by further reductions in waiting time over the life of this Strategy
- Giving people more time to cross by using a walking speed of 0.8 metres per second to determine crossing times (currently 1.2 metres per second)
- Installing sensors (Pedestrian SCOOT) to allow the amount of green man time to be automatically adjusted according to the number of people crossing
- Reducing overcrowding by widening crossings to provide a minimum pedestrian comfort level of B+
- Introducing formal diagonal crossings at all crossroads, ensuring pedestrian crossings are on desire lines and removing multi-stage crossings
- Installing raised tables to improve accessibility and ease crossing
- Introducing 'Green man authority' at appropriate locations – providing a default green man for people walking rather than a default green light for motor traffic

Continuous footways and courtesy crossings

We will give people walking greater priority and make streets easier to cross by:

- Providing courtesy crossings or continuous footways across all side street entrances
- Installing raised tables at junctions
- Installing raised tables at existing informal crossings and identifying locations for additional crossing points

Campaigns and promotion

Campaigns and promotional activities will raise awareness among all street users of the priority being given to people walking in the Square Mile. Physical changes to streets will be supported by education, engagement and enforcement to reinforce positive behaviours by drivers and riders towards people walking.

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Proposal 11: Take a proactive approach to reducing motor traffic

Delivering this Strategy will result in a reallocation of street space from motor vehicles to provide more space for people walking, cycling and spending time on the City's streets. To avoid unreasonably impacting the movement of essential motor traffic it will be necessary to reduce the overall volume of motor vehicles on the City's streets. Reducing motor traffic is also key to improving air quality and delivering Vision Zero.

We will proactively seek to reduce motor traffic to support the delivery of this Strategy, with the aim of achieving at least a 25% reduction by 2030. Reductions in all types of motor traffic will be required to achieve this, with the most significant reductions being in the number of private cars and private hire vehicles using the City's streets.

To achieve this reduction, we will champion and support the development of the next generation of road user charging for London and encourage the Mayor of London and TfL to accelerate the development of new charging mechanisms.

This new approach to charging should be implemented within the next Mayoral term. All income should be reinvested in the delivery of Healthy Streets, with a proportion of income generated ring fenced to provide funding for City of London and borough projects.

While the new charging mechanism is being developed, we will encourage TfL to undertake a further review of the existing Congestion Charge. This review should be wide-ranging and consider charging levels, boundaries, timings and exemptions.

If a clear commitment to road user charging is not set out in the next Mayor's election manifesto, we will explore the feasibility of developing an appropriate charging mechanism for the Square Mile, working with London Councils and London's boroughs to ensure a coordinated approach.

Additional measures and initiatives to reduce motor traffic in the Square Mile will include:

- Supporting TfL's efforts to reduce the number of Private Hire Vehicles operating in central London. We will also work with TfL and large operators to reduce circulation and empty running and promote ridesharing
- Working with the taxi industry to reduce empty running of taxis within the Square Mile, including a City-wide review of taxi ranks and promotion of ride hailing apps
- Delivering Proposals 38 and 39 to reduce the number of delivery and servicing vehicles in the Square Mile, particularly at peak travel times
- Working with TfL to identify opportunities to reduce the number of buses travelling through the City without compromising public transport accessibility (Proposal 49)

- Not providing any additional on-street car and motorcycle parking, identifying opportunities to use parking reductions and restrictions to discourage private vehicle use and continuing to require all new developments to be car-free
- Working with businesses to reduce the use of private cars, private hire vehicles and taxis for commuting and for trips within the Square Mile and central London
- Introducing access restrictions and other measures to reduce through traffic in line with the City of London Street Hierarchy (Proposal 12)

In addition to reducing traffic by 25% by 2030 we will aim for a reduction in motor traffic volumes of at least 50% by 2044. We will publish more details about how we plan to achieve this level of reduction, including working with TfL to develop coordinated measures across central London, following the next Mayoral election and clarification of how the next Mayor will approach road user charging in central London. Achieving this level of traffic reduction is likely to require new shared mobility services and other transport technology innovations, which the City Corporation will support and champion through our Future Transport Programme (Proposal 43).

Proposal 14: Make the best and most efficient use of the kerbside and car parks

We will keep the use and management of the kerbside and City Corporation car parks under frequent review to:

- Identify opportunities to reallocate space from on-street car and motorcycle parking to increase the space available for people walking, support the delivery of cycle infrastructure and provide additional public space and cycle parking
- Ensure adequate on-street provision of short stay commercial parking, disabled bays, taxi ranks, loading bays and coach bays
- Identify spare capacity in City Corporation car parks and explore alternative uses for this space
- Identify opportunities to reduce obstructions caused by vehicles loading or waiting to pick up passengers, particularly ~~on bus and cycle routes and at~~ at peak travel times
- Ensure cycle and bus lanes are kept clear of obstructions from stationary or parked vehicles

We will complete and consult on the outcomes of the first City-wide kerbside review by 2022, with further reviews conducted at least every five years. Each review will include a comprehensive data collection exercise to understand current use of the kerbside and City Corporation Car Parks. No strategic changes to the provision of kerbside facilities will be implemented before the review is completed or consulted on.

In addition to the items outlined above, this review will consider the potential to:

- Extend the charging period for on-street parking bays to include evenings and weekends for non-commercial vehicles
- Introduce variable charging for motorcycle parking based on motorcycle size and emissions
- Encourage the use of car parks for long stay parking by reducing the maximum parking time for cars and vans on-street and introducing a maximum on-street parking time for motorcycles
- Extend the Controlled Parking Zone hours to evenings and weekends
- Designate on-street car parking as 'service bays' during the working day (7am-7pm), with parking restricted for use by commercial vehicles
- Reduce the maximum loading period from the current 40 minutes when the City's Controlled Parking Zone restrictions apply
- Introduce more dedicated loading bays and use technology to allow real-time management of loading activity
- Implement multi-use spaces, for example loading bay during off-peak hours, additional pavement space during the morning, lunchtime and evening peaks and a taxi rank during the evening

~~Further reviews will be conducted at least every five years.~~

Proposal 17: Keep pavements free of obstructions

We will ensure that pavements are free of obstructions by:

- Not permitting a-boards on the pavement and encouraging owners and occupiers to not place a-boards on private land adjacent to the pavement
- Only allowing outdoor seating where businesses can demonstrate that adequate width will be maintained during the busiest time of day
- Working with owners and landlords and using the licensing system to prevent pavements and streets being blocked by people standing outside bars and pubs
- Ensuring operators of dockless cycle hire schemes require users to leave bikes in designated parking locations and promptly remove any cycles not left in these locations (see Proposal 28)
- Continuing to reduce clutter by removing unnecessary street furniture and ensuring remaining furniture is positioned to maintain a clear walking route, including identifying opportunities to affix street lights and signs to buildings
- Seeking to maintain a pedestrian comfort level of B+ when installing new street furniture, signage, trees and greenery, bollards and security features (see Proposal 2)
- Ensuring that temporary signage does not significantly reduce pavement width and work with contractors, utilities and developers to ensure signs are placed in carriageway when they will not pose risk to other road users
- Review the role of pavement obstructions in incidences of trips, falls and claims against the City Corporation
- Where it is essential to locate electric vehicle charging infrastructure on-street, charge points will be installed in the carriageway rather than on the pavement (see Proposal 30)

Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

We will deliver Vision Zero to eliminate death and serious injuries on the City's streets by 2040. Our interim targets are that no more than 35 people a year are killed or seriously injured by 2022 and that there are fewer than 16 deaths or serious injuries a year by 2030

Measures to deliver Vision Zero and reduce road danger will be delivered across four themes:

- Safer streets
- Safer speeds
- Safer vehicles
- Safer behaviours

We will work in partnership with the City of London Police, TfL and organisations representing different street users to apply the safe system approach and the principles of road danger reduction. This means:

- Being proportional in our efforts to tackle the sources of road danger, focussing on those users of our streets who have the greatest potential to harm others due to the size and speed of their vehicle
- Recognising that people will always make mistakes and that collisions can never be entirely eliminated. Our streets must therefore be designed, managed and used to cater for an element of human error and unpredictability
- Reducing vehicle speeds on our streets to minimise the energy involved in collisions and protect people from death or injury
- Seeking to reduce slight injuries and fear of road danger alongside the principal focus on eliminating death and serious injuries

We will publish a comprehensive Road Danger Reduction Action Plan every five years. The 2018 – 2023 plan will be updated in 2019 immediately following the adoption of this Strategy.

Safer streets

We will redesign our streets to reduce the likelihood and severity of collisions. Locations for change will be identified and prioritised based on the risk to people walking, cycling and riding powered two wheelers, and the number and severity of collisions. Locations will be reviewed on an annual basis.

Priority locations for change by 2030, using analysis of data from 2012 to 2017 data, are:

- Moorgate (London Wall to Eldon Street)
- High Holborn (Holborn Circus to Warwick Lane)
- Cannon Street (Mansion House Station to New Change)
- St Paul's Gyratory

- Aldersgate Street/Beech Street
- Fleet Street/New Fetter Lane Junction
- Lombard Street – Fenchurch Street Corridor
- Old Broad Street/London Wall
- Camomile Street/St Mary's Axe

In addition, we will work with TfL to deliver changes at the following priority locations on the TLRN:

- Bishopsgate
- Monument Junction
- Embankment (Temple Avenue to Puddle Dock)
- Mansell Street
- Southwark Bridge/Lower Thames Street
- Upper Thames Street (London Bridge to Eastcheap)

In addition to the above we will work with TfL to monitor and if necessary, further improve Farringdon Street and New Bridge Street (including Ludgate Circus).

Other measures to change streets to reduce the likelihood and severity of collisions will include:

- Narrowing and raising the entrances to side streets to require drivers and riders to manoeuvre more slowly
- Exploring the potential for changing the look and feel of streets to reinforce positive behaviours by people driving and riding in the Square Mile, including appropriate speed, acceleration and overtaking. Innovative techniques that use road markings and temporary or light touch changes to give behavioural cues will be trialled and assessed in up to five locations by 2022
- Continuing to maintain a smooth and level surface on pavements and carriageways to reduce the risk of trips and falls by people walking and riding in the City

Safer speeds

Reducing the speed of vehicles decreases the likelihood of a collision and the severity of injury in the event of one.

To ensure people drive and ride at speeds appropriate to the City context we will seek permission from the Department for Transport to adopt a City-wide 15mph speed limit by 2022. If successful, we will encourage TfL to seek permission to deliver this new limit on the TLRN, particularly along the Bishopsgate corridor.

We will work with the City of London Police to deliver engagement, education and enforcement to support the implementation of the 15mph speed limit.

To make it easier for drivers to comply with the existing 20mph and proposed 15mph speed limits we will encourage the uptake of intelligent speed adaptation (ISA) in the Square Mile by:

- Asking TfL to prioritise the roll out of bus ISA on routes which operate in the Square Mile, with the aim of bus ISA operating on all routes by 2022.
- Adopting ISA in our own fleet procurement practices as part of our renewal programme. Insurance savings will be quantified and shared as best practice guidance for City suppliers and through the Fleet Operator Recognition Scheme (FORS)
- Ensuring ISA is a standard requirement for any service procured by the City Corporation with a fleet requirement
- Promoting the installation of ISA in taxis and private hire vehicles and encouraging TfL to make ISA a requirement for new taxis and private hire licensing.
- Encouraging the uptake of ISA in other fleets, such as hauliers, construction firms and coach operators
- Working with the insurance industry and vehicle manufacturers to promote and encourage the use of ISA in private vehicles

Safer vehicles

We will improve the safety of motor vehicles which use City's streets by:

- Using fleet accreditation schemes, such as the Fleet Operator Recognition Scheme (FORS), to integrate safety into fleets by:
 - Continuing the CityMark accreditation programme to ensure vehicles at City construction sites meet **FORS** standards. We will encourage the inclusion of CityMark in Construction Logistic Plans (CLP).
 - Encouraging TfL and industry stakeholders to develop FORS or similar standards for coaches and vans by 2022.
 - Encouraging the integration direct vision standards as part of **FORS** all accreditation schemes. This will also be mandated through CLPs and CityMark for City construction sites once the standards are implemented and normalised.
 - Supporting TfL with developing a motorcycle fleet accreditation **FORS** standard for couriers and delivery riders, which will include improved safety training.
- Continuing to inspect over 1000 vehicles each year with the City Police Commercial Vehicles Unit and continue support the London Freight Enforcement partnership alongside Transport for London, the Metropolitan Police and the Driver and Vehicle Standards Agency. We will identify opportunities to intensify the programme and map enforcement related to development density by 202022.

- Work with industry, sector associations and motorcycle riders to identify and understand levers for motorcyclists to choose lighter, less powered vehicles when riding to and around the City.
- Identifying any potential risks associated with the uptake of new technologies, including the increased use of quieter zero emission capable vehicles.

Safer behaviours

We will encourage all the users of our streets to travel safely by:

- Expanding the ‘exchanging places’ training course for professional drivers to include the experience of walking, as well as cycling, in the Square Mile
- Encouraging TfL to require safety training as part of private hire and taxi licensing. This will include Bikeability Level 3 training
- Providing and promoting free cycle training for people who live, work and study in the City; working closely with City businesses to offer this training in a convenient and easily accessible way
- Encouraging TfL to include safety-based performance measures instead of timetable performance measures in bus contracts. We will work with TfL and operators to implement these changes as part of its Bus Safety Standard
- Working with the City of London Police to deliver targeted enforcement of dangerous and reckless driving and riding, including using plain clothed officers
- Promoting safe driving and riding through targeted behaviour change campaigns.
- Work with the freight industry and research partners to understand the impact of delivery schedules on driving style and speeds

Proposal 24: Apply a minimum cycling level of service to all streets

We will make the Square Mile a safe, attractive, and accessible place to cycle by applying a minimum cycling level of service to all streets by 2035.

On the streets shown in Figure X below, which will form a core cycling network, we will ensure that either:

- Motor traffic volumes are kept below 150 vehicles an hour in each direction at the busiest time of day and priority is given to people cycling over motor vehicles. If necessary, we will introduce traffic management measures to reduce the number of vehicles on these streets.

or

- Protected cycle lanes that are a minimum of 1.5m wide per direction of travel are provided, with 2m wide protected cycle lanes wherever possible.

We recognise that initially it may not be possible to achieve these levels of service at all locations and will identify mitigating measures in the short and medium term to manage this.

We will prioritise cycling improvements and interventions on the core cycle network. This will ensure that nearly all property entrances are within 250m of the network, providing access to destinations across the Square Mile and linking with the wider London cycle network.

We will support cycle logistics and the use of cycles as mobility aids by ensuring that all parts of this network are designed to be accessible to non-standard cycles, such as cargo cycles or adapted cycles.

We will deliver the Bank to Blackfriars section of the the following parts of the core cycle network (including improvements at Mansion House junction) by ~~2030~~2025:

- ~~• Aldgate to Holborn Circus via Bank including connecting the City Cluster to Cycle Superhighway (CS) 2 and CS6~~
- ~~• CS3 to St Paul's via the City Cluster and London Wall (in conjunction with planned network improvements at St Paul's Gyratory)~~
- ~~• CS1 to CS4 via Bank (including working with TfL to make improvements to Monument Junction)~~
- ~~• Bank to Blackfriars (including improvements at Mansion House junction)~~
- ~~• CS2 to CS3 via Mansell Street (in partnership with TfL)~~

~~We will deliver t~~The following parts of the core cycle network will be delivered by 2030:

- Aldgate to Holborn Circus via Bank including connecting the City Cluster to Cycle Superhighway (CS) 2 and CS6
- CS3 to St Paul's via the City Cluster and London Wall (in conjunction with planned network improvements at St Paul's Gyratory)
- CS1 to CS4 via Bank (including working with TfL to make improvements to Monument Junction)
- CS2 to CS3 via Mansell Street (in partnership with TfL)

On Local Access streets that do not form part of the core cycling network, we will aim to keep motor traffic volumes below 150 vehicles an hour in each direction at the busiest time of day to give priority to people cycling over motor vehicles. For the majority of Local Access streets this will require relatively little intervention, other than junction improvements. Traffic levels are already low, and this Strategy will deliver reductions in traffic volumes (Proposal 11) and introduce a City-wide 15mph speed limit (Proposal 20). In cases where traffic volumes exceed this limit we will seek to reduce traffic volumes through changes to access and traffic management.

On City Access streets, we will aim to meet the standards described above but recognise this may not be possible on all streets due to their role in traffic movement or space constraints. Other proposals in this Strategy, such as the introduction of a City-wide 15mph speed limit, will help make these streets safer, more attractive, and more accessible places to cycle.

To support the new cycling levels of service we will also:

- Review all shared pedestrian/cycle spaces, such as Queen Street, and where necessary propose physical changes, campaigns, education, engagement and enforcement to improve interactions between people walking and cycling
- Use signage and road markings to emphasise priority for people cycling over motor vehicles
- Introduce safety improvements at the priority locations identified in Proposal 21 to ensure they are safe and easy places to cycle
- Trial temporary schemes and infrastructure wherever possible to review impacts on other street users and accelerate the delivery of the cycle network
- Learn from and incorporate any best practice and standards guidance, such as the London Cycling Design Standard and the Dutch CROW manual, when designing and delivering cycling infrastructure improvements in the City

Additional measures to support the delivery of the core cycle network will include:

- The use of Construction Logistics Plans and Delivery and Servicing Plans to manage the number of freight vehicles using the network, particularly at peak times
- Enhanced cycle wayfinding and signage, including signage at eye level wherever suitable
- Working with boroughs neighbouring the City and TfL to improve continuity and connectivity between our cycle networks

Proposal 29: Support and champion a central London Zero Emission Zone

We will support and champion the introduction of a Zero Emission Zone (ZEZ) covering central London within the next Mayoral term

We will seek a phased introduction of ZEZ restrictions with the aim of ensuring that 90% of motor vehicles entering the Square Mile are zero emission capable by 2030. This is likely to be achieved through a combination of access restrictions and charging for non-zero emission capable vehicles.

If a clear commitment to introduce a central London ZEZ is not set out in the next Mayor's election manifesto, or commitments are insufficiently ambitious, we will explore the feasibility of implementing a City-wide ZEZ, working with London Councils and boroughs neighbouring the City to ensure a coordinated approach.

Local Zero Emission Zones

While the Central London ZEZ is being developed, we will introduce local ZEZs covering the Barbican and Golden Lane estates and the City Cluster by 2022. Proposals will be developed in consultation with residents and businesses and will reflect the availability of zero emission capable vehicles, while seeking to accelerate their uptake. We will coordinate proposals with TfL, London Councils and London's boroughs to ensure alignment with other existing and planned zero emissions areas and streets.

Proposal 38: Reduce the number of freight vehicles in the Square Mile

We will seek to reduce the number of motorised freight vehicles in the Square Mile by 30% by 2044 and facilitate the transition to ultra-low emission and zero emission delivery vehicles.

To achieve this target, we will work with businesses, suppliers, the freight industry and other relevant partners to deliver an integrated freight programme that incorporates retiming, consolidation, last mile logistics, construction logistics, better use of the river and smarter procurement practices. These solutions are not unifotmally applicaple to all types of delivieries and we will work with the freight industry to target intervettions at the most appropriate types of delivery.

Retiming deliveries

We will explore the potential for area and City-wide timed access and loading restrictions for motorised freight vehicles. Our aim is to reduce the number of these vehicles on our streets in the peak periods by 50% by 2030 and by 90% by 2044, while ensuring businesses and residents can still receive essential deliveries.

Measures to encourage retiming will include:

- Permitting night-time deliveries where there will be negligible impact on residents both en route and in the City. Through the planning process we will ensure all appropriate new developments have restrictions to limit deliveries between 7am-10am, 12pm-2pm and 4pm-7pm
- Engaging with property managers, occupiers and businesses which may wish to retime deliveries and seeking to remove any restrictions in their planning consents where there will be negligible impact on residents
- Integrating out of peak deliveries as part of the sustainable logistics programme and identify opportunities for retiming freight on an area basis within Healthy Streets Plans (see Proposal 12)
- Working with London Councils, TfL and neighbouring local authorities to modernise the London Lorry Control Scheme (LLCS) to generate more opportunities for out of peak and night time deliveries.

Consolidation

Using established best practice, we will work with a partner haulier to provide a consolidation service for the Square Mile by 2022. A major engagement exercise with City businesses will promote and encourage the use of this consolidation service. This will include developing a consolidation toolkit for City businesses, informed by monitoring of the benefits arising from consolidating deliveries to the Guildhall complex.

We will also continue to use the planning process to require all new major developments to use a consolidation service to reduce deliveries to their buildings.

In the longer term we will develop a commercially sustainable approach to consolidation for the Square Mile and establish a sustainable logistics centre to serve the City by 2030. This centre will co-locate major suppliers in a single warehouse, alongside consolidation, waste collection and couriering services.

Last mile logistics hubs

We will enable more deliveries within the Square Mile to be made by cargo cycles, on foot and by small electric vehicles by:

- Delivering two last mile logistics hubs in underutilised City Corporation assets by 2022. A further three hubs will be delivered by 2025.
- Establishing additional last mile logistics hubs if appropriate underutilised assets are identified.
- Exploring opportunities to acquire new sites within or adjacent to the Square Mile for last mile logistics hubs.
- Working with developers and land owners to integrate last mile logistics hubs as part of major City developments.

Increase the use of the River Thames for freight

We will maximise the potential to use the Thames for the movement of freight by:

- Maintaining the commercial waste operation at Walbrook Wharf and supporting additional waste carried through the Wharf
- Identifying opportunities to increase the use of the river for freight deliveries to the Square Mile
- Working closely with Thames Tideway to identify future opportunities for their wharves and barges once construction is completed.
- Working with river freight operators to ensure that their fleets meet Port of London Authority air quality standards
- Exploring the use of Blackfriars and Tower Piers and a reinstated Swan Lane Pier as points to transfer freight for last mile delivery on foot or by cargo cycle.

Reducing the impact of construction logistics

To facilitate future development while minimising the impact of construction logistics, we will:

- Work with TfL to update Construction Logistics Plan guidance by 20~~19~~²². This updated guidance will include stricter expectations for construction consolidation and on-site waste compaction. It will also review the potential for emerging technology, such as 3D printing or higher payload and carrying potential of new rigid axle vehicles to reduce the number of deliveries.
- Work with developers and contractors to adapt and develop construction delivery management systems to facilitate retiming of deliveries to outside the 7-10am peak.

- Through the planning process, all development within the City must consider use of the River Thames for the movement of construction materials and waste.

Procurement and personal deliveries

To encourage smarter commercial decision making for our businesses and influence how residents and workers get goods delivered, we will:

- Share information on the impact of personal deliveries on traffic in the City, including air quality and road danger and promote the use of click and collect services.
- Establish a collaborative procurement programme for the Square Mile by 202~~20~~20. This will allow businesses, particularly small and medium sized businesses, to share suppliers and waste services. We will work with Cheapside Business Alliance and the Aldgate Partnership to trial the programme prior to a City-wide roll out.
- Identify opportunities for other City Corporation initiatives, such as Plastic Free City and our Responsible Business Strategy, to support efforts to reduce the number of deliveries and waste collections

Proposal 41: Reduce the impact of construction and streetworks

The needs of people walking will be prioritised during streetworks and construction, with the aim of maintaining a comfortable and accessible walking route on both sides of the street, with space reallocated from general traffic as necessary. Accessible diversions must be provided if space constraints do not allow an acceptable level of temporary provision.

We will work with utility companies, contractors and developers to minimise the impact of construction and streetworks on people walking and cycling. Traffic management plans for construction sites and streetworks will maintain access for different users in accordance with the following hierarchy:

- Walking
- Cycling ~~and buses~~
- Buses and taxis
- Freight access
- General traffic

We have a Network Management Duty which requires us to ensure we apply best practice to managing streetworks. We will review this in 2019 and on a regular basis to ensure our activity and processes remain up to date and effective.

Within the context of the Network Management Duty, we will encourage the drafting of legislation to allow penalties to be charged against developments that overrun their agreed licence periods for scaffolds and hoardings.

We will review the City's Guidance Notes for Activities on the Public Highway in 2019 to ensure that guidance is in line with best practice and the requirements outlined above. A review will include considering the opportunity to introduce lane rental controls on our major streets to further reduce the impact of street works.

We will seek to minimise disruption caused by streetworks by:

- Encouraging collaborative working and coordinating street works
- Exploring the potential for new technology to reduce noise and the extent of works and speed up delivery
- Reducing the duration of works by allowing extended and night-time working where noise considerations allow, while maintaining protection for residents.
- Improving signage and permit information, to include contact details, purpose of works and other information such as reason for site inactivity
- Improving communication through better engagement with businesses and residents for longer duration works
- Work with TfL to improve communication on the impact of streetworks and other maintenance on public transport services
- We will work with TfL to explore the potential to further adjust traffic signal timings to reflect actual and modelled traffic flows during periods of network disruption. We will also explore new adaptive traffic control technologies as they emerge through our Future Transport Programme (Proposal 43)

We will use medium and long-term street closures as an opportunity to open streets to people, for example working with businesses to provide temporary seating or programmed events. We will also monitor the traffic impacts of long-term street works to inform transport and resilience planning and assess the potential for retaining capacity reductions or access restrictions.

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Proposal 43: Establish a Future Transport Programme

We will establish a Future Transport Programme to work with developers of mobility innovations. This programme will:

- Engage with industry, academia, government Catapults, local governments, and local and international ~~and~~ partners to deliver transport innovation and technology trials across the City, including trials on:
 - App-based parking and un/loading permitting and enforcement
 - Technology-assisted kerbside space reallocation
 - On-demand accessible shuttles and shared transport services
 - App-assisted pedestrian crossing technologies for the partially sighted and people who require more time to cross
 - Geofencing and permitting
 - Use of drones to support the emergency services and make urgent deliveries to hospitals
 - Technology to support the delivery of Vision Zero by reducing the likelihood and severity of collisions
- Identify measures required to support the uptake of appropriate mobility solutions, such as off-street storage of shared autonomous vehicles
- Host conferences and seminars and support competitions and awards for transport innovations and technologies
- Explore the potential for commercial opportunities and partnerships within the transport technology and innovation industry.

A ~~more detailed programme of activities will~~ Future Transport Programme Action Plan be developed ~~shortly after the publication of the Transport Strategy and~~ in consultation with the Future Transport Advisory Board (Proposal 44) and published by 2020.

We recognise the significant potential for new technologies to improve the City's streets and will openly enter into discussion with any innovators. Future transport innovations will be considered appropriate for trial and use in the City context if they support the delivery of Healthy Streets and adhere to the following requirements (when applicable):

1. Support priority for people walking and efforts to enable more people to choose to walk, ~~and~~ cycle and take public transport, and not shift people from these sustainable travel modes ~~to~~ unsustainable travel modes
2. Contribute to efforts to reduce motor vehicle volumes and mileage and not increase motor traffic volumes
- 2-3. Ensure that all users, including disabled users, are accommodated and that no street user is excluded for any reason
- 3-4. Lead to an overall increase in vehicle occupancy and loading
- 4-5. Help make our streets safer and not increase road danger, collision rates, collision severity, terrorism risk, or the need for additional policing or enforcement
- 5-6. Reduce vehicle speeds and ensure vehicles travel at speeds appropriate to conditions and the City context

- 6-7. _____ Minimise obstructions to vehicles and people walking, and not permanently obstruct pavements or add clutter
- 7-8. _____ Improve the efficiency of kerbside use and not increase parking or loading space requirements
- 8-9. _____ Help spread travel demand, for both people and goods, more evenly across the day, such as outside morning, lunchtime and evening peaks and overnight
- 9-10. _____ Help make streets and the City's air cleaner and quieter by reducing transport related emissions and noise
- 10-11. _____ Improve the experience of using the City's streets and open spaces and support efforts to increase the amount of public space

Additional requirements apply to the introduction of connected and autonomous vehicles, drones and droids on our streets.

- *Connected and autonomous vehicles* must not require any changes or infrastructure that have a negative impact on our streets, such as bollards or barriers
- **Drones** must not operate without CAA and City of London permission
- **Droids** must not operate on pavements or in such a way as to obstruct or pose a danger to any user of our streets

Developers and operators of new transport innovations and services are expected to:

- Share all beneficial data generated or collected with the City Corporation to aid in policy and decision making
- Not discriminate against any potential user, either through active discrimination or through profiling or algorithmic/AI discrimination or bias
- Accommodate every user, especially those requiring wheelchairs or mobility aids when innovations and technologies incorporate motor vehicles
- Not generate any unreasonable additional costs for the City Corporation or users
- Ensure any supporting digital software and hardware is sufficiently and rigorously safeguarded from malicious use or intent that could pose a risk to physical or digital safety in the City
- Readily and proactively engage with the City Corporation and City residents, workers, students, and visitors whenever beneficial and regularly inform all interested groups ~~them~~ of their activities and plans

Appendix 4: Corporate Plan outcome mapping

Transport Strategy outcome	Corporate Plan outcome
The Square Mile's streets are great places to walk and spend time	9. We are digitally and physically well-connected
Street space is used more efficiently and effectively	9. We are digitally and physically well-connected
The Square Mile is accessible to all	3. People have equal opportunities to enrich their lives and reach their full potential 8. We have access to the skills and talent we need
People using our streets and public spaces are safe and feel safe	1. People are safe and feel safe
A wider range of people choose to cycle	9. We are digitally and physically well-connected
Our air and streets are cleaner and quieter	11. We have clean air, land and water and a thriving and sustainable natural environment
Delivery and servicing are more efficient, and impacts are minimised	5. Businesses are trusted and socially and environmentally responsible
Our street network is resilient to changing circumstances	12. Our spaces are secure, resilient and well-maintained
The Square Mile benefits from better transport connections	9. We are digitally and physically well-connected
Emerging transport technologies benefit the Square Mile	9. We are digitally and physically well-connected

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
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