

City of London Transport Strategy Review Consultation Report

Department of Environment

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Contents

Introduction to the Report	3
Consultation Methodology	3
Focus of the Strategy	5
Vision and the addition of Proposal 1b: Embed inclusion in our approach to transport planning and delivery	7
Key change - feedback on changing the Vision and the addition of Proposal 1b	7
Outcome 1: The Square Mile's streets are great places to walk, wheel and spend time	12
Key change - feedback on a change of language to reference 'wheeling' to include people who use wheelchairs, mobility scooters and other wheeled mobility aids	13
Feedback on the Proposals and other proposed changes to the 'Square Mile's Streets are a great place to walk, wheel and spend time' Outcome	13
Outcome 2: Street Space is used more efficiently and effectively	17
Key change - feedback on our approach to road user charging in the City	18
Feedback on the changes to Proposals within the 'Street Space is used more efficiently and effectively' Outcome	18
Outcome 3: The Square Mile is accessible to all	21
Feedback on the Proposals and proposed changes to the 'Accessible to All' Outcome	22
Outcome 4: People using our streets and public spaces are safe and feel safe	25
Key change - feedback on the Proposal to remove the commitment to introduce a 15mph speed limit in the Square Mile	26
Feedback on the Proposals and proposed changes to the 'Safe Streets' Outcome	26
Outcome 5: Improve the experience of riding cycles and scooters in the City	29
Key Change - feedback on the proposed change to the cycling Outcome and Proposals to include micromobility (e.g. Scoote Electric Scooters)	
Feedback on the Proposals and proposed Changes to the 'More People Choose to Cycle in the City' Outcome	31

Outcome 6: The Square Mile's air and streets are cleaner and quieter	33
Key change - feedback on the proposal to remove the commitment to a local Zero Emission Zone (ZEZ) covering parts City of London	
Feedback on the Proposals and proposed changes to the 'Cleaner and Quieter' Outcome	34
Outcome 7: Delivery and servicing needs are met more efficiently, and impacts are minimised	37
Key change - feedback on the proposal to remove the commitment for the City of London Corporation to provide a conscentre	
Feedback on the Proposals and proposed changes to the 'More Efficient Freight and Servicing' Outcome	38
Outcome 8: Our street network is resilient to changing circumstances	41
Feedback on the Proposals and proposed changes to the 'Resilient Streets' Outcome	42
Outcome 9: Emerging technologies benefit the Square Mile	44
Feedback on the Proposals and proposed changes to the 'Emerging technologies benefit the Square Mile' Outcome	45
Outcome 10: The Square Mile benefits from better transport connections	47
Feedback on the Proposals and proposed changes to the 'Better Transport Connections' Outcome	48
Delivering the Strategy	51
Feedback on the Proposals and proposed changes to the 'Delivering the Strategy' Outcome	52
Managing Traffic Movement and Access	54
Feedback on the proposed approach to the 'Managing Traffic Movement and Access'	55
Conclusion	58

Introduction to the Report

This report summarises feedback received during the public consultation on the City of London Corporation's Transport Strategy Review and the response to this feedback.

In some instances respondents commented on proposals in the Strategy with no proposed changes. For completeness, we have included these comments in our analysis and this report.

The analysis of responses has covered all methods of communication and engagement during the consultation period. This included correspondence from organisations, stakeholder workshops, one to one meetings and the online consultation through the Commonplace platform.

We have reviewed all comments, and several Outcomes and Proposals have been updated, providing further detail or clarity based on stakeholder feedback, however, no significant changes are considered necessary.

Consultation Methodology

Utilising the Commonplace engagement platform, a seven-week consultation on the proposed changes to the Strategy ran from Thursday 16 November 2023 to Sunday 7 January 2024 (inclusive). The consultation was open to anyone (group or individual), whether a resident, business owner, worker or visitor, with an interest in the City. A stakeholder workshop was held in late November, this was attended by representatives from businesses, interest groups, neighbouring London boroughs and Transport for London (TfL) and St Bartholomew's Hospital, Barts Health NHS Trust

Drop-in sessions were held in a number of public buildings (the Guildhall, libraries etc) throughout November and December 2023. These were attended mostly by residents. Officers also attended the City Residents' meeting in the Old Bailey in December 2023.

Feedback from all of these sources are included in this report.

The Commonplace consultation received responses from over 400 individuals (some individuals made more than one contribution). The 'Key Changes' section received the most responses and in particular key changes relating to becoming more inclusive (384 responses), to the Cycling Outcome (386 responses) and to Road User Charging (352 responses). More details sections covering each outcome all received fewer than 60 responses, with Resilient Streets (18 responses), Innovation Benefiting the Square Mile (18 responses) and Delivering the Strategy sections (17 responses) receiving the fewest responses.

Organisations that responded through Commonplace:

- Action Vision Zero
- London Living Streets
- St Bartholomew's Hospital and NHS Trust
- United Cabbies Group
- UK Coach Operators Association

Organisations that responded direct in writing:

- City Property Association
- City of London Business Improvement Districts (BIDs gave a collective response, for "Aldgate Connect BID, Cheapside Business Alliance, Culture Mile BID, EC BID, Fleet Street Quarter BID",)
- Members of the City of London Access Group (CoLAG), (with additional workshop)
- London Cycling Campaign
- Motorcycle Action Group
- Port of London Authority
- Transport for London (TfL)
- UK Coach Operators Association (and via Commonplace, see above)

In terms of demographics of respondents on the Commonplace platform, the majority of consultation participants (61%) described themselves as a man. 27% described themselves as a woman, 7% preferred not to say and 5% identified as non-binary or another gender. The highest proportion of respondents were 55-64 (24%), followed by 45-54 (21%) and 65-74 (20%). 23% of consultation participants indicated their day-to-day activities are limited due to a physical or mental health condition or disability. The most common postcodes for place of residence were SE (16%), N1 (11%) and EC (10%). An income of over £100,000 was the most common response for the household's approximate annual income. Leisure visitors (54%), workers (32%) and business visitors (26%) were the three main connection types to the area.

Commonplace's report on the consultation is available at www.cityoflondon.gov.uk/transportstrategy.

Focus of the Strategy

Other than changes to the cycling outcome to include other micromobility modes, changes to the overall approach and focus of the Strategy were limited. However, we still asked for feedback on the Transport Strategy continuing to focus on:

- Prioritising the needs of people walking and wheeling, make streets more accessible and deliver high quality public realm
- Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles
- Ensuring that no one is killed or seriously injured while travelling on our streets, including through measures to deliver safer streets and reduce speeds
- Enabling more people to choose to cycle by making conditions for cycling in the Square Mile safer and more pleasant
- Improving air quality and reduce noise, including by encouraging and enabling the switch to zero emission capable vehicles.

58% (198) of consultation respondents agreed that the activity described above should remain the focus of the Strategy. 33% (113) of respondents disagreed. 342 people responded to this question.

Expressions of support for the focus of the Strategy.

The main positive feedback focused on reducing motor traffic (33 comments), accompanied by applause for the ethos of enabling active/sustainable travel and movement (32), with an anticipated reduction in air pollution (30). A real focus/prioritisation on people, rather than vehicles, together with public realm (30) and safety improvements for people who walk and/or cycle (28) (creating a more pleasant, healthy and 'people-based' environment in which to move through and spend time in) were additionally mentioned. Improved safety (22) and health (15) also featured.

- **TfL** expressed support for the strategy overall, including commitment to Healthy Streets approach and delivery and the Vision Zero targets, which support the Mayor's Transport Strategy.
- The **CPA** commented supporting the overall ambition and asking us to go further with changes that prioritise people walking and wheeling and not to undermine this with responding to minority needs.
- The **City BIDs** noted support for overall approach and many of its proposals, supporting walking and wheeling remaining as the top priorities to be considered in designing and managing streets.

Expressions of opposition to the focus of the Strategy

The top theme focused on a perceived failure to recognise a practical need for motor transport (28 comments) by some people due to age, mobility issues or circumstance. This linked strongly to the second theme of inequality as a result of restricted motor access (22). The third most frequent theme was a perceived failure to address inconsiderate and poor cycling behaviour (21).

Vision and the addition of Proposal 1b: Embed inclusion in our approach to transport planning and delivery

The Transport Strategy seeks to make explicit the City Corporation's commitment to ensuring our streets and public spaces are welcoming and inclusive by introducing a new overarching Proposal. **Proposal 1b: Embed inclusion in our approach to transport planning and delivery.**

Proposal 1b will sit alongside Proposal 1a: Embed the Healthy Streets Approach and will inform the delivery of all other proposals. It will set out our method to considering all protected characteristics and socio-economic impacts when planning and making changes to our streets. It supports processes for inclusive engagement and consultation, inclusive design and for assessing the positive and negative impacts of projects (and services) we intend to implement through Equality Impact Assessments (EqIA) and the Public Sector Equality Duty (PSED). It also ensures we challenge and support ourselves and our delivery partners in developing best practice in regard to inclusive policy-making and design.

It was important that the Vision of the Transport Strategy be revised to reflect the addition of Proposal 1b and the emphasis on 'inclusiveness', which goes beyond accessibility. Hence, it was proposed that the Vision be updated to: 'Streets that inspire and delight, world-class connections and a Square Mile that is inclusive and accessible to all'.

Key change - feedback on changing the Vision and the addition of Proposal 1b.

Feedback was received from a number of stakeholders in person at workshops, meetings, drop-in sessions and through written communication via email and the online consultation.

The ethos of promoting greater inclusivity through revisions to the Vision and the new Proposal 1b (Proposal 1b: Embed inclusion in our approach to transport planning and delivery) was welcomed by a number of stakeholders who regarded this as an important and forward-thinking step. It was felt that Proposal 1b showed clear alignment with the ambitions and the promotion of equality. Within this theme some gave praise that the Proposal seeks to ensure all voices are heard, showing commitment to remove barriers in the design stage and promote equity.

The online consultation attracted responses from 384 people. More than half (53%) agreed with revising the Vision and including Proposal 1b to take a more inclusive approach, 108 online respondents (28%) disagreed. Looking at demographic group

differences, respondents who cycle and women were higher than average in recording support for revising the Vision and increasing inclusivity.

Members of the City of London Access Group, members of the City Property Association, the UK Coach Operators Association and St Bartholomew's Hospital, Barts Health NHS Trust all supported the additional of Proposal 1b to the strategy. Online consultation respondents left 78 positive comments noting that they considered this proposal an important, positive and forward-thinking step to improve inclusivity and equity in the City. It was recognised that reducing traffic, street closures and implementing pedestrian priority streets can be a significant benefit to society and certain protected characteristic groups. Additional supportive feedback from the open drop-in sessions and workshops included:

- recognising the need to consider all members of society during service delivery
- encouraging EDI training for all City Corporation staff, and especially those who are involved with delivering the Transport Strategy

Engagement with City Corporation Equality, Diversity and Inclusion officers and leads of the City Corporation Staff Diversity Networks indicate they are supportive of the addition of Proposal 1b to the Strategy. These groups are:

- the Young Employees Network,
- the Carers and Parents Network.
- the City of London Ethnicity & Race Network,
- the Multi-Faith Staff Network,
- the Women's Inclusive Network
- the City Pride Network,
- and the Social Mobility Network

Consulting a wide diversity of voices and experiences has been key to informing Proposal 1b. It has shown there is strong support for the addition of Proposal 1b and a call for the City Corporation to be more specific regarding accessibility, safety and inclusivity objectives.

A number of respondents made requests for more inclusive language, requests for language to follow the Social Model of Disability, and requests to include further references and representation of protected characteristics and other groups in the Strategy.

Expressions of opposition to the proposed changes

108 online respondents (28%) disagreed with revising the Vision and including Proposal 1b to take a more inclusive approach.

Those who use private transport (Private transport' includes car drivers/passengers and powered 2 wheeler riders) were lower than average in terms of support for the proposal changes.

Comments from online consultation respondents related to concerns that the Transport Strategy's ambition to reduce motor traffic was not achievable or inclusive. Respondents noted concerns that street closures and restrictions have negative impacts on accessibility (and do not strengthen inclusivity), especially for disabled people and those who need motorised access.

Some respondents also felt that the change was an unnecessary revision and represented "vague terminology" and "box-ticking semantics".

Summary responses and changes.

The Strategy recognises that restrictions on motor traffic may negatively affect some disabled people, older people, pregnant people, those who care for infants and/or young children or those who may find it difficult to walk. It also acknowledges that for many people with accessibility requirements, vehicle access remains necessary to maintain even a low level of personal mobility and independence. The Proposals in Outcome 2 have already been updated to acknowledge this and we will ensure these requirements are considered through the Equalities Impact Assessment process (under Proposal 1b). Access to properties is retained within all our proposals, although it is recognised that restrictions may impact the route options to a location and make some journeys longer.

The measures on reducing traffic are core to the Transport Strategy and the City Corporation's commitment to increase active travel, improve air quality and improve health and wellbeing, as well as supporting Vision Zero, Climate Action Strategy and City Plan ambitions. Taking a proactive approach to reducing motor traffic, making the best and most efficient use of street space and continuing to improve accessibility are central to the delivery of the Transport Strategy. Mitigating the impact will be covered in decisions through the EqIA process. Whilst recognising some of the negative impact on those with protected characteristics, the overall approach to removal of traffic creates a safer more comfortable environment for people while moving around the City, including older and disabled people.

The concerns raised by respondents reinforce the need for Proposal 1b to assist with identifying and mitigating impacts. Proposal 1b makes explicit our commitment to taking an inclusive approach to all transport and public realm project delivery and policymaking.

As many of the opposition comments expressed concerns about decreasing accessibility and not considering the needs of disabled people, it is important to note that we have retained 'Outcome 3: The Square Mile is Accessible to all' and its constituent Proposals. These are dedicated to improving accessibility of our streets and reflect the priority to maintain our focus on removing barriers to travel in and around the Square Mile.

An Action Plan will be developed in collaboration with our stakeholders to review our ambitions and set out steps that can be implemented, and monitored against a timeline. This will meet our new commitments around being more transparent and accountable as we develop and implement the Transport Strategy. We will report on progress in the Transport Strategy Annual Report.

We have **updated** the introductory text with context on:

- Our Action Plan and how we will develop and grow our understanding of inclusivity
- How Proposal 1b will support corporate EDI objectives, Corporate Plan other City Corporation Strategies and Policies for coherence

We have **updated** the wording of Proposal 1b and Inclusion Principles to:

- Clarify accountability mechanisms for championing and monitoring progress
- Acknowledge the diversity of our communities and make reference to specific personal experiences
- Take the opportunity to name protected groups where possible, so everyone sees themselves in our ambitions in our Inclusion Principles.
- Simplify the language
- Review the language in the Strategy to follow the Social Model of Disability
- Name all protected groups in the Proposal text, and take the opportunity to identify benefits to specific groups where appropriate so everyone sees themselves in our ambitions
- Provide more references to Equity
- Provide definitions of terms, in a glossary.

We acknowledge our stakeholders' desires for more detail on training. This can be considered further during the development of the Action Plan. Corporate Plan objectives also identify staff and member training as necessary and will report on progress.

Proposal 1b has been well researched and modelled off guidance developed by the UN Secretariat for the Convention on the Rights of Persons with Disabilities, the Cities for All Global Campaign on Inclusive and Accessible Cities, and Oxford University's Inclusive Cities Framework and other national guidance, policies or strategies for coherence, the ambition is important to set to change culture and attitudes.

Outcome 1: The Square Mile's streets are great places to walk, wheel and spend time

Walking is, and will remain, the main way that people travel around the Square Mile. We want people walking in the City to feel that their needs have been prioritised. By delivering this Strategy we will make the experience of walking on our streets a more enjoyable and rewarding experience – a great way to travel and to discover all that the City has to offer.

Fewer and cleaner motor vehicles will mean that streets are less dominated by traffic and easier to cross. People driving and riding in the City will recognise the Square Mile as a place where people on foot come first – they will travel slowly and be prepared to give way to people walking.

Respondents were asked to indicate their support or opposition to the proposed changes under Outcome 1 – outcome name, proposals 1-10. A summary of proposed changes to the text of Proposals 1 - 10 are listed below.

- Update the language to be more considerate and inclusive, for example we propose to adopt "walking and wheeling" across all of our proposals. Using 'walking and wheeling' together is advocated by Active Travel England, Wheels for Wellbeing, Transport for All, Sustrans, Mobility and Access Committee in Scotland and more, as it includes people who use mobility aids on our streets.
- Deliver new pedestrian priority routes going from east to west and north to south (Figure 5 shows future commitments to priority routes).
- Deliver new pedestrian priority routes through the Healthy Streets Plans and seek to make our streets safer, easier to cross, and more accessible in partnership with Transport for London. In places we will re-allocate more space to people walking in wheeling, from motor traffic, by widening pavements and reducing space for traffic.
- Refer to the ambitions of the City's 2020 Climate Action Strategy (CAS) and Biodiversity Action Plan 2021-2026, which commit to implementing more greenery into the City's streets and public spaces, including planting an additional 100 trees by 2025.
- Update and maintain Legible London maps and directional signs across the Square Mile, including reference to accessible routes and lifts where possible. We will explore the potential for additional wayfinding to support Destination City activity. Improve the experience of spending time on the City's streets by identifying temporary and permanent opportunities to integrate exercise and play, planting and greening, art installations, and more seating for people.

Key change - feedback on a change of language to reference 'wheeling' to include people who use wheelchairs, mobility scooters and other wheeled mobility aids

On the key change flagged in this Outcome, almost 60% (189) of 315 respondents to this question agreed with the proposal to extend 'walking' language to include 'walking and wheeling'. 21% (66) disagreed.

Looking at demographic differences, those who cycle and younger people were slightly more supportive of this proposed language change compared to other groups. Private transport users were less supportive than average.

Feedback on the Proposals and other proposed changes to the 'Square Mile's Streets are a great place to walk, wheel and spend time' Outcome.

50 people responded to the general question on whether they supported changes to proposals within this Outcome with overall agreement at 54%, 32% disagreed.

All of the other questions asked in this outcome received positive feedback.

- 65% (30) of consultation participants agreed with the proposal to reallocate more street space to people walking and wheeling, alongside the improvement of pedestrian routes (Proposal 2)
- Public realm improvements, together with the renewal and rejuvenation of spaces proved a particularly popular proposal welcomed by 75% (34) of consultation participants (Proposal 7)
- Greening and tree planting in the context of meeting the Climate Action Strategy ambition also proved a popular proposal, receiving a positive response by 74% (33) of consultation participants (Proposal 8).

Further comments included concentrating tree planting and greening on streets, as well as small parks where they are needed most for their cooling effect and significant boost to wellbeing.

Expressions of support for the proposed changes

27 people online and the organisations listed below expressed their support or agreed with the changes proposed to these Proposals within this Outcome:

City of London Business Improvement Districts (BIDs)

- City Property Association (CPA)
- Port of London Authority (PLA)

Some of those respondents highlighted particular reasons for their support, including:

- The CPA welcomed the general approach and in particular pedestrian priority streets, upgrades to crossing points and
 connections to the riverside walking route, and creating accessible walking and wheeling routes across the City. They
 support temporary public space creation to demonstrate the benefits of long term schemes (such as the 'Lunchtime Streets'
 programme)
- The **PLA** welcomed the aim that a series of north-south and east-west routes will provide improved walking, wheeling, and cycling connections to key attractions, destinations and public spaces, including to link to the various bridges across the River Thames within the City as well as east-west along the Thames Path.

The online comments included:

- Positive proposals contributing to a healthy society, with improved living, air quality.
- · Reducing motorised traffic.
- Promoting a walk, wheel and cycle ethos.
- A radical, forward-thinking set of ambitions in the context of a climate emergency.
- Retaining the original essence of the proposals whilst making them more inclusive.
- Providing an oasis of resting and relaxing space for residents, visitors and wildlife.

A number of outcome level comments included suggestions to further enhance the network of walking and wheeling routes and general quality of public realm, including working closely with BIDs and other local stakeholders to help deliver improvements.

Supportive comments on proposal with no proposed change

Further comments were made on proposals which had no proposed changes, stating support and encouraging us to deliver those actions and proposals. **TfL** supported improvements to pavement widening that should be advanced as far as possible, even if not able to achieve the desirable comfort levels (Pedestrian Comfort Level B+) (proposal 2). **LCC** requested further temporary link enhancements which could be delivered pending full enhancement of the cycle network (proposal 2).

LCC stated that access to the riverside could be improved immediately by re-opening the gate on Upper Thames St at Puddle Dock. With a crossing point this would be a key element in improving step-free access to the City of London School, as well as the riverfront. **CPA** also supported improvements to the riverside walking route, and in particular upgrades / improvements to the crossing points (proposal 3)

The **PLA** broadly supported proposal 3 but recommended that the City's own Riverside Strategy should be brought into the Transport Strategy, specifically referencing the importance of river safety in any enhancement works.

The City of London BIDs suggested proposal 6 should be expanded, recommending the use of public art should be considered to help wayfinding and compliment Legible London maps, with the Barbican explicitly mentioned as an appropriate location for this.

The **CPA** were keen to see more public space in the City. They note that traffic reductions over the last few years should provide the opportunity to free up and reallocate space once used for car parking and traffic and to create new and vibrant public spaces. They noted that they would like to see the City Corporation go further including pedestrianising City streets with low traffic volumes where appropriate (proposal 7).

Action Vision Zero stated that missing from this outcome was a vision for walking that is unique and personal to the City. Action Vision Zero commented that there was an opportunity for parts of the City to become car-free at the weekend.

Requests to improve littering and cleansing standards also came up in few comments.

Expressions of opposition to the proposed changes

United Cabbies Group (UCG) felt that the City Corporation was inappropriately prioritising people that wheel over those with disabilities/mobility issues who are unable to wheel.

16 online respondents did not support the changes within this Outcome. Some of their reasons were:

- Increasing space for active travel will increase congestion and air pollution.
- Prioritising people who walk over those who cycle.
- Decreasing public safety.
- Lack of access to taxis.

Anti-motorist.

Most negative comments received were challenging the level of priority given to walking and wheeling, and expressing concern that there is a need for motor vehicles to move around city streets.

Summary responses and changes

The priorities set out in the strategy putting those walking and wheeling first, reflects the fact that walking and wheeling are the main way that people travel around the City. Access by vehicle to all locations is possible for those who cannot walk, however we accept that for some locations the journey may be made longer due to reallocation of street space or access restrictions.

The Strategy already commits to a programme of Healthy Streets minor schemes, which deliver improvements on walking routes, including those to the riverside. We will continue to work with TfL to provide pedestrian / walking and wheeling links to the Thames path.

Work with Destination City team and BIDs is intended to explore and maximise partnership opportunities. Detailed plans will be provided in the Transport Strategy 5yr Delivery Plan.

No changes will be made to proposals in this outcome.

Outcome 2: Street Space is used more efficiently and effectively

We want the use of the Square Mile's streets to better match the priorities of residents, workers and businesses. Street space will be used more efficiently, with more space and time provided for people walking, cycling and travelling by bus. General reductions in the number of motor vehicles will help reduce delays for the essential traffic that remains.

Some streets will be used in different ways at different times of the day. For example, by providing space for people to walk and relax during the day, while allowing deliveries overnight. Temporary closures of streets to motor vehicles will provide opportunities for cultural and community events or simply enjoying the City. The kerbside will also be used more dynamically and effectively, with commercial vehicles having priority access to parking and loading no longer causing an obstruction, particularly at the busiest times of day.

Respondents were asked to indicate their support or opposition to the proposals under Outcome 2 – Street Space is used more efficiently and effectively (proposals 11-15). A summary of proposed changes to the text of Proposals 11 - 15 are listed below.

- Update to make explicit that we will retain access to streets for essential traffic. We will also recognise that restrictions on motor traffic can result in longer journeys and may negatively affect a proportion of people who are disabled, and others who have mobility impairments. The extent of restrictions and types of vehicles excluded will be decided on a case-by-case basis, applying the approaches outlined for inclusivity, walking and wheeling and in accordance with the street hierarchy
- Complete and develop a number of Healthy Streets Plans by 2027 (shown in Figure 7 of the Transport Strategy) and commit to reviewing these every 10 years
- Remove the commitment to developing a road user charging mechanism specific to the City of London (like a local 'congestion' charge), and instead commit to support the Mayor of London and TfL on the development of a London wide charging mechanism
- Remove "Proposal 15: Support and champion the 'Turning the Corner' campaign" as these principles were incorporated into the revised Highway Code January 2022. Motor vehicles are now required to give way to people walking and cycling when turning left into a side street
- Commit to monitoring the numbers of private hire vehicles (PHVs) operating in the City and support TfL's approach to managing the number of PHVs operating in London to an appropriate level.

Key change - feedback on our approach to road user charging in the City

In the Key Questions section, we asked for feedback on our approach to road user charging as part of the Strategy. This involved removing the commitment to developing a road user charging mechanism specific to the City of London (a local 'congestion' charge), and instead committing to support the Mayor of London and Transport for London on the development of a London wide charging system. 352 people responded to this question, and the views on proposals for road user charging were split, with 42% in agreement, compared to almost 40% against.

Comparison of support across the demographic groups, showed those that walk and cycle being more supportive than average. Whereas private vehicle users and taxi/PHV drivers and passengers, along with those whose day-to-day activities were limited by a physical/mental health condition or disability showed lower than average support for this proposal.

When reviewing the comments for the key change, support for a uniform charge across all central London was welcomed, rather than having a separate road user charge in the Square Mile. However, some respondents felt that there was a lack of certainty that the Mayor's proposal for this was likely to be delivered.

Feedback on the changes to Proposals within the 'Street Space is used more efficiently and effectively' Outcome

39 people responded to this question and there was mixed opinion on the proposed changes to the efficient use of street space Outcome. Just under half (49%) of consultation participants agreed with the Proposal changes, countered by 40% who disagreed with them.

Expressions of support for the proposed changes

19 people and the organisations listed below expressed their support for changes to proposals within this Outcome but made no specific requests for changes. Some of the online respondents highlighted particular reasons for their support, including:

- A genuine commitment to reprioritising street use
- Considering people before profits
- Making the city easier to walk in and around
- Monitoring the use of private hire vehicles

• An opportunity to tackle unlawful e-scooter/e-bike usage.

Other comments of support for continuing or enhancing the approach already set out in the Transport Strategy were made including, **City of London BIDs** supported the 10-year horizon for Healthy Streets Plans (HSPs) (proposal 11) but would welcome a 5-year interim review to ensure progress is on track. They requested that BIDs are consulted at the very early stages of design development to ensure that BID public realm strategies can align closely with HSPs.

The **PLA** supported the proposal to prepare a Healthy Streets Plan for the City Riverside Area by 2027 (proposal 11). The **City Bridge Foundation** made representation to seek support for traffic reduction on Tower Bridge, particularly for larger vehicles. (proposal 11).

Expressions of opposition to the proposed changes

15 people (39% of 39 respondents) disagreed with the changes to proposals in this outcome. When reviewing the detailed comments, it is likely that a number of those disagreeing with the proposed change to support the next generation of road user charging did not agree with any form of road user charging. Some of those opposing the change to the City's road user charging principle, were noting concern about the reduction in tools/mechanisms to deliver traffic reduction committed to in the City's own targets and felt that there was considerable uncertainty around a London wide scheme being delivered.

Many of the comments directed at changes in proposal 11 (key change) to road user charging were around the impact on businesses of any road user charging system. Others noted the view that these (systems) were 'only' additional taxation of motorists and money generating schemes.

Motorcycle Action Group (MAG) stated that the City Corporation's decision to classify powered two wheelers as 'general traffic' alongside cars is irrational and ultimately counterproductive to the City's aims (Approach to managing traffic and Access).

Other online respondents highlighted particular reasons for their opposition, including:

- Making London more restricted and less welcoming
- Restricting road access and individual movement
- Discriminating against car drivers and those who cannot walk/cycle long distances

- Black cab accessibility should not be restricted
- No consideration of motorcycles.

Summary Responses and Changes

Traffic reduction measures are core to delivering the benefits of the Strategy, including creating more space for walking and wheeling, greening and public realm improvements.

Changes to vehicles access and traffic reduction are key to achieving more and better space for walking and wheeling, as well as other outcomes. Access by vehicle to all locations is possible for those who cannot walk or wheel. We accept that for some, the journey may be made longer due to reallocation of street space or point access restrictions. We endeavour to find app-based solutions when available, to providing taxi access for disabled passengers through restrictions.

We consider that the next generation of road user charging will give the opportunity to explore more targeted approaches to road pricing and therefore traffic reduction. The revised proposal 11 includes the commitment to working with TfL to develop the next generation of road user charging. The next generation of charging should overcome some of the limitations of the congestion charge, being capable of being more sensitive to location, user type, and distance travelled.

Whilst the Mayor of London has not set a target date for a new road user charge scheme, he has initiated engagement and commenced discussion on options and objectives, which the City is participating in.

No further changes will be made to the proposals in this outcome.

We have **updated** the classification for powered two wheelers (PTWs) and others in DVLA class L1, in the text setting out how we approach **Managing Traffic Movement and Access**.

Outcome 3: The Square Mile is accessible to all

The City of London Corporation will continue to work towards ensuring everybody is able to travel easily, comfortably and confidently to and around the Square Mile. This includes supporting and championing accessibility improvements to Underground stations, offering opportunities for people to stop and rest, and continuing to remove obstacles to walking, wheeling and cycling.

The Strategy will continue to ensure pavements and crossings are not obstructed and are designed to be smooth, level and wide enough to avoid uncomfortable crowding wherever possible. The City of London Corporation will continue to work collaboratively with partners, residents, and stakeholders representing the needs of different street users when designing streets, and make spaces that are usable by everyone, regardless of age, ability and circumstance.

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 3 – The Square Mile is accessible to all. A summary of proposed changes to the text of Proposals 16-19 are listed below.

- Remove the commitment to create a City of London Street Accessibility Standard, as we have now developed the City of London Street Accessibility Tool (CoLSAT). The tool enables street designers to easily identify how street features impact on the different needs of disabled people and identifies the trade-offs that may be needed to ensure no one is excluded from using the City's streets. We will apply CoLSAT to all projects on-street and in the public realm, and we will encourage developers and partners to use it during their own design and planning process.
- Update our commitments with reference to additional dockless bikes and scooter use in the Square Mile. Ensuring partnership working encourages safer and more inclusive behaviours, and ensures that people parking cycles and escooters do not cause obstruction on our pavements.
- Remove "Proposal 18: Keep pedestrian crossings clear of vehicles". This proposal is no longer considered necessary as
 existing legislation includes blocking a crossing, except in instances where it is absolutely necessary to avoid injury or
 damage. The use of colour and markings at crossings is likely to negatively impact on some disabled people and is no
 longer considered an appropriate mechanism for tackling this issue.
- Support accessibility improvements to London's wider public transport network, as improvements beyond the City's
 boundary are key to reducing extra travel time or longer routes. Furthermore, we acknowledge that barriers to travel include
 more than just lack of step free access, but also lack of accessible route planning information, poorly trained staff, absence
 of visible staff to help etc.

Feedback on the Proposals and proposed changes to the 'Accessible to All' Outcome

The majority of stakeholders that engaged in the Transport Strategy review acknowledged the importance of accessibility for all.

Stakeholders who supported the changes to the Accessibility Outcome included:

- City residents
- Employees of City businesses
- Members of the City of London Access Group (CoLAG)
- Members of the City Property Association (CPA)

25 responses were received from the online consultation, with support from 12 of the consultation participants (48%), but receiving disapproval from 10 (40%) respondents.

A lot of detailed comments were received through focussed workshops with CoLAG and some online respondents also left very detailed comments.

As this Outcome contained few changes, or changes that simply reflected updates following progress made, there were no questions in the Key Changes section for this Outcome.

Expressions of support for the proposals.

Stakeholders including the **CPA**, **COLAG** and other workshops stakeholders supported this outcome and its proposals and noted that accessibility should be a priority for the Strategy.

When we analysed the comments left by respondents in the online consultation, it was clear that respondents felt the Strategy should prioritise access for disabled people and improve accessibility through:

- Slowing traffic; 'managing' cycle behaviour; including wheelchair buttons on pedestrian crossings to allow more time for people to cross.
- Improving wayfinding and ensuring lifts and escalators are better maintained.
- Providing more places to stop and rest for disabled people.

Further comments encouraged us to:

- go further with provision for disabled people and ensure bridges and riverside connections are more accessible
- develop app based options to allow taxi access where essential
- ensure full engagement with disabled groups, including those with neuro diverse issues
- better provide for disabled electric mobility scooters;
- prioritise good maintenance to streets and pavements affecting disabled people, and
- better manage temporary obstacles such as e-bikes and scooters.

There was support from residents for the update to Proposal 17 to include more enforcement for e-scooters and e-bikes and remove obstructions to create safer streets. Other comments focussed on the impact that vehicles and cyclists jumping red lights have on visually impaired people feeling unsafe.

Several residents and online comments noted that more should be done to ensure pavements are well maintained and accessible including during construction work.

There was support from City residents and CoLAG for improving accessibility to stations and having accessible stations. However, a City resident noted that they felt that although the Elizabeth Line is step-free, the distances are too far to walk, making the station inaccessible to a lot of people.

CoLAG and other online comments reflected the view that the use of vehicles is essential for many wheelchair users.

Expressions of opposition to the proposed changes

10 online respondents disagreed with the changes. When reviewed in more detail, online respondents who expressed their opposition for Proposals within this Outcome did not indicate that their opposition was directly related to specific changes in Proposals 16-19. Instead, many of the comments received expressed concerns and strongly requested the City Corporation to do more to improve accessibility in the City and consider the needs of disabled people. Nearly all of these comments have already been considered or provided for within the Strategy.

United Cabbies Group (UCG) felt that the Strategy is overly focussed on being accessible to those on foot or wheeling at the detriment to those who need accessible public transport like publicly hired taxis.

Summary Responses and Changes

The **updated** introductory text for the Outcome will provide context around accessibility and respond to many of the comments made which have requested greater clarity and explanation, but changes to the proposals are not considered necessary.

Comment on the impact of access restrictions is included in Outcome 2 response above.

Proposal 30 (provision of Electric Vehicle infrastructure) will be **updated** to include wheelchairs / mobility scooters in the list of users to be considered in the Electric Vehicle Charging Action Plan.

Outcome 4: People using our streets and public spaces are safe and feel safe

No one should be prevented from choosing a particular mode of transport because of concerns for their personal safety. Delivering the Strategy will result in fewer motor vehicles on our streets and those vehicles will be moving at slower speeds. Collisions will occur less often and will not result in death or serious injury. Fewer, slower vehicles, together with high quality street lighting, will also mean that streets feel safer at all times of the day.

Motor vehicles themselves will be equipped with advanced sensors and better automatic safety features that will further reduce or eliminate human driving error. Security features will be sensitively incorporated into the streetscape and will incorporate features that help make streets more attractive places to walk and spend time. The Square Mile will continue to experience a low rate of crime and fear of crime, supported by

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 4 – People using our streets and public spaces are safe and feel safe, proposals 20-23. A summary of proposed changes to the text of Proposals 20-23 are listed below.

- Remove the commitment to seek a City-wide mandatory 15mph limit after this was turned down by the Department for Transport.
- Change the trajectory of our ambition to achieve zero fatal and serious injuries by 2040, with a new target of fewer than 20 deaths and serious injuries by 2030.
- Update priority locations for Safe Streets interventions based on revised collision and casualty data analysis.
- Update the proposal to include a Post Collision Response theme, including collision investigation, evaluation and post-crash victim care.
- Broaden the crime and fear of crime proposal to include anti-social behaviour, violence against women and girls, and serious violence, with a focus on the night-time economy.
- Update the street lighting proposal to reflect the completion of the street lighting upgrade and focus on the application of the Lighting Strategy when operating existing and installing new lighting.

Key change - feedback on the Proposal to remove the commitment to introduce a 15mph speed limit in the Square Mile

In the Key Questions section, the proposal received mixed views on *not* committing to a 15mph speed limit in the Square Mile. 157 respondents (45% of consultation participants) agreed with this while almost 136 (39% of respondents) disagreed.

191 comments were received that supported the proposal to remove the commitment to introduce 15mph limits. Themes of commentary included that the 15mph speed limit was too slow, (61 comments) unnecessary (24 comments) and that 20mph was sufficiently low (23 comments). Those responding to the key change question around the removal of 15 mph restriction, where 136 people disagreed, the comments mostly challenged the proposal to remove the commitment, stating that 15mph limits were necessary for improving safety (91 comments), with benefits for the environment (9 comments).

Looking at average scores for different demographics, residents and those whose day-to-day activities were limited by a physical/mental health condition or disability, were slightly more likely than average to agree with this change. However, there were lower than average levels of agreement with this change amongst other groups, namely those visiting the City for leisure and business purposes, those who walk and/or cycle, and younger people, under the age of 35. Comments in the survey reflected that people that cycle were less likely to support the proposal to remove the 15mph commitment as they felt that it would reduce the opportunity improve their safety on the City's streets.

Two stakeholder representatives (Living Streets, Action Vision Zero) and a number of online consultation respondents expressed the need to rethink the removal of 15mph from the Strategy, with clearer explanation of the rationale for this, they suggested it would be good to keep the ambition.

Feedback on the Proposals and proposed changes to the 'Safe Streets' Outcome

28 people responded and 17 (over 60%) agreed with the proposals and proposed changes regarding Safe Streets. 10 people (36%) disagreed with the changes.

Expressions of support for the proposed changes

The organisations listed below expressed their support for proposals within this outcome but made no specific suggestion of requests for changes:

- The CPA welcomed the Safe Systems approach, including designing for lower speeds, as the target for collision reduction is
 not yet met. Achieving Vision Zero is core to making walking, wheeling and cycling more inclusive.
- TfL noted its support for the outcome and welcomed joint efforts to eliminate all road deaths by 2041.
- Barts Health NHS Trust welcome and support continued action to develop streetscapes that induce lower speeds and give greater priority to enable safer and more comfortable flow for pedestrians and cyclists.

In the online consultation, 17 people (61% of consultation participants) agreed with the proposals and proposed changes regarding Safe Streets, suggesting that there is broad support for the changes made.

Comments made agreed with the priority to address serious collisions amongst people walking and cycling, which represent the greatest numbers in the collision and casualty data.

On-street policing and lighting is identified as a priority, in line with the Strategy.

Further comment themes included welcoming that the strategy includes an approach to make progress towards Vision Zero; and doing more to ensure people driving cars correctly give way to those who walk and/or cycle.

Referring to proposal 20, comments were received that recognised and welcomed the commitments made in the proposal to deliver junction improvements, but pointed out that these did not include locations outside of the Square Mile.

Expressions of opposition to the proposed changes

From the online consultation, 10 people disagreed with the changes to proposals, and a number of comments were received that challenged the proposed changes to the Safe Streets outcome. Some of the comments made supported the principles of road danger reduction but felt that proposed changes weakened this section of the Strategy, treating motor traffic fatal risk less seriously at the expense of more vulnerable users of the City's streets

Other themes of responses challenged the 'Safer Systems' approach overall, rather than the specific changes, describing it as unachievable due to the fallibility of humans, and dismissed the need to have slower speeds.

Summary responses and changes.

We have **updated** proposal 20 to note we will explore the introduction of lower advisory speed limits on specific streets across the Square Mile where they would help create lower speed environments, support efforts to prioritise people walking and wheeling and reduce road danger.

We have **updated** proposal 20 to include further wording to underline our commitment to working with TfL and neighbouring boroughs, on designing safer streets that are on or just beyond the City boundaries, reflecting that TfL and other neighbouring London boroughs have a commitment to Vision Zero.

We have **updated** proposal 20 to promote the use of advanced driver assistance systems (ADAS) which includes telematics, intelligent speed assistance (ISA) etc, for our own fleet and suppliers, in place of solely ISA.

We have **updated** proposal 21 to include reference to crime against women and girls.

We have **updated** proposal 22 to include a reference to 'cycle parking' in the statement to work with industry partners on hostile vehicle mitigation street furniture.

Outcome 5: Improve the experience of riding cycles and scooters in the City

Delivery of the Transport Strategy will mean more people choosing to cycle, and cycles being used for more types of journeys. We want the range of people choosing to cycle to match the diversity of people who live, work, study in and visit the City. Most people, whether they choose to cycle or not, will consider cycling to be a safe, easy and pleasant way to travel around the Square Mile. Reduced traffic, slower speeds and a dense network of cycle friendly streets will mean that anyone who wishes to cycle is not prevented from doing so because of concerns about safety. The cycle network will cater for all types of cycles, including cycles as mobility aids and cargo cycles. Different types of cycles will also be available for hire across the City, supporting more flexible cycling. A safer and calmer cycling experience will in turn encourage more considerate and appropriate cycling behaviour that reflects the priority given to people walking on the City's streets.

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 5 – Improve the experience of riding cycles and scooters in the City, proposals 25-28. A summary of proposed changes to the text of Proposals 25-28 are listed below.

- Update the outcome and proposal to include scooters, as well as to treat scooters in the same way as cycles in our policies and projects (subject to them being made fully legal in future legislation by central Government).
- Revise our minimum design standard to reflect changes in deliverability, ensuring it remains in line with best practice in London outlined in Transport for London's Cycle Route Quality Criteria.
- Expand proposals to improve cycle hire in the City to reference e-scooter hire as well and provide more parking spaces for all dockless hire vehicles.

Key Change - feedback on the proposed change to the cycling Outcome and Proposals to include micromobility (e.g. Scooters, Electric Scooters)

This proposed change was responded to by 386 respondents in the Key Questions section. Around 135 (35%) of consultation participants agreed with this change to include scooters, their view was countered by a slightly higher number 143 (37%) who disagreed.

Younger people and those who cycle or walk scored higher than average levels of support for this change. City residents, private transport users and those whose day-to-day activities were limited by a physical/mental health condition or disability expressed lower than average support.

This outcome and the three proposals have had a substantial rewrite to reflect the changes in what vehicles and types of vehicles should be catered for under an umbrella term of 'micromobility'. This drew a lot of comments reflecting the amount of change, and that these were highlighted for respondents to comment on.

Support was received for the approach to accept scooters and e-bikes, by 135 people. Detailed comments in support of this proposal were on the following themes:

- Positive but be more ambitious (21)
- Promotes a practical alternative to motor vehicles (16)
- Promoting inclusivity (12)
- Need to segregate routes (4)
- Tackling scooter parking being necessary and regulating scooters (4)

Expressions of opposition to the proposed changes

From the online consultation 143 respondents did not support the change, and included comments on the following themes:

- Scooter behaviour (91)
- Cycle behaviour (52)
- Only provides for a minority group (14)
- Anti motorist (12)

- Cycle lanes underused (6)
- Scooter regulation need (6)

Feedback on the Proposals and proposed Changes to the 'More People Choose to Cycle in the City' Outcome

44 people responded online with 19 agreeing with the proposed changes (43%) and 17 disagreeing (39%).

Expressions of support for the proposed changes

The organisations listed below expressed their support for Proposals within this Outcome (in full or in part) but made no specific suggestion of requests for changes:

- TfL
- City of London BIDs
- The **CPA** welcomes the aim to improve the experience of cycling and scooting, in particular achieving a minimum service level, and improving key intersections with micromobility in mind.

Whilst most respondents felt that better regulation is essential, some concerns were raised by **LCC** that heavy handed regulation of e-bikes / scooters and rental schemes would be a step backwards, as the presence of these in the transport system is welcome.

Expressions of opposition to the proposed changes

Comments expressing opposition, to both the key change and other changes in this section, fell under two key areas, firstly the impact on space and safety for people walking and wheeling. Comments included that riding and parking of dockless bikes and scooters was having an impact on people walking around the city, feeling that space available on pavements has been badly affected by poor dockless e-bike parking. Opposition was received on safety grounds, with comments that that moving bikes and e-scooters are more of a threat as there is a new trend to cycle on pavements in some locations, around residents areas rather than busy streets in the office dominated space. Comments were also focussed on the lack of observance of traffic signals and zebra crossings by people cycling, making people feel unsafe, with this issue affecting disabled people more significantly.

A number of respondents felt that scooters and cycles are given a higher priority, including investment in infrastructure, than they need.

The second key theme that raised objections was that we should be doing more for people cycling. The changes to the delivery timetable where infrastructure is being completed later than first planned drew negative comment. Additionally a call to lobby TfL more strongly on the parts of the cycle network that are TLRN and need some changes to address cycle and pedestrian safety and to ensure we are aligning with MTS.

Summary response and changes.

Much of the negative feedback was around the relationship between people riding scooters and cycles and other street users. We will continue to work on providing a network which addresses these issues where possible. We are actively reviewing locations of high conflict, and will consider any physical changes possible.

We also work closely with the City of London Police to address illegal behaviour of all street users. Many comments also related to poor management of hire e-bikes, impacting safety and space, which we are working to resolve and lobbying for regulation to allow us to manage operators better.

The changes to the delivery timetable, where infrastructure is being completed later than first planned, drew negative comment; it should be noted that some sections of the cycle network have been delivered earlier than planned through pandemic response schemes being retained. The new programme for delivery of cycle infrastructure is considered to best reflect funding available and feasibility to deliver changes within other major traffic management or street reconfiguration schemes, such as St Paul's gyratory and the Rotunda, improvements will be delivered linked to timetable for major developments.

There are no further changes to the proposals in this outcome.

Outcome 6: The Square Mile's air and streets are cleaner and quieter

Delivery of the Transport Strategy will mean that by 2044, transport related local air pollution and carbon emissions will have been cut to virtually zero, and streets will be quieter more relaxing places. Together with wider action to reduce emissions from buildings and development, this will mean that the City enjoys some of the cleanest urban air in the world. There will be fewer motor vehicles and those remaining will be powered by electricity or other zero emission technologies.

Emerging automation technology will reduce speeds and avoid aggressive acceleration and braking, leading to less tyre and brake wear. New approaches to noise management will mean that street works cause less disturbance.

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 6 – The Square Mile's air and streets are cleaner and quieter, proposals 29-37. A summary of proposed changes to the text of Proposals 29-37 are listed below:

- Remove the commitment to local Zero Emissions Zones (ZEZ) covering parts of the City of London.
- Remove the reference to supporting a ZEZ covering central London within the next Mayoral term, given the indication by City Hall and TfL that the Mayor no longer intends to implement one.
- Support the use of next generation road user charging to control traffic more sensitively according to location and time and to replace the congestion charge and ULEZ charge.
- Update our proposal to reference the work the Department for Transport (DfT) is doing on noise enforcement and our intention to use new powers if appropriate for city locations after the completion of a 'noise camera' trial.

Key change - feedback on the proposal to remove the commitment to a local Zero Emission Zone (ZEZ) covering parts of the City of London

This proposal was included in the Key Questions section of the consultation where a total of 297 people responded. The proposal received mixed views in relation to removing our commitment to provide a ZEZ. 110 people (37% of respondents) agreed with this change, while 107 people (36%) who disagreed.

Of those who agreed with the change, a number considered ZEZs a money-making scheme (15 comments online) and commented that providing a ZEZ in the City was unnecessary and unachievable (29 comments online). Other respondents made positive comments (32 in total) that pursuing alternatives as now proposed is appropriate.

In detailed comments, concern was expressed that the reliance on the next generation of road user charging to control traffic levels and vehicle related pollution was at risk as this was not a firm commitment from the Mayor. Concern was also expressed about over reliance on electric vehicles.

Respondents had concerns that the removal of the ZEZ proposal failed to tackle air pollution and that we should pursue alternatives (63 online comments).

Looking at the demographic differences, City of London residents and workers, rail users and older people (aged 55+) were slightly more supportive than average of this change to proposal. Those who cycle were less supportive than average.

Feedback on the Proposals and proposed changes to the 'Cleaner and Quieter' Outcome

29 people responded to this question, with 17 people (58% of consultation participants) agreeing with the proposed changes regarding the Square Mile's air and streets being cleaner and quieter. However, nine people (31%) disagreed with these.

Expressions of support for the proposed changes

The organisations listed below expressed their support for Proposals within this Outcome but made no specific suggestion of requests for changes:

- City of London Business Improvement Districts (BIDs)
- London Cycling Campaign (LCC)

• TfL noted the progress on reducing nitrogen oxides since the introduction of the ULEZ.

The combined **BIDs** response supported this outcome and welcomed the action to engage with SMEs to accelerate the transition to zero emission capable vehicles, but also called for an increase to charging infrastructure by the City to assist with this aim.

Action Vision Zero expressed strong support for the noise camera trial, under proposal 34; and further in the online responses this proposal attracted a number of comments, indicating that tackling noisy vehicles is a priority and that a progressive approach should be adopted which could act as a model for neighbouring boroughs.

Of the 29 respondents to the overarching question on changes proposed to the outcome, 17 of these (58%) expressed their support. Online comments included:

- Excellent recommendations regarding noise enforcement and working with businesses to look at alternative delivery systems.
- Applause for removing the commitment to provide a ZEZ; including that air quality no longer needs improvement.
- The need to expand provision of electric charge points, including for larger vehicles in the future

Some other suggestions were made encouraging clarity and the need to go further, in providing for a wider range of vehicle types in future, vehicles over 7.5 tonne and coaches, and consideration of hydrogen as well as electric. There was also a request to ensure we clarify the targets in relation to national standards for air quality as these have changed since the publication of the 2019 Strategy.

Expressions of opposition to the proposed changes

Of the 29 respondents to the overarching question, nine expressed their opposition to the changes proposed for the Outcome. Comments were similar to those commenting on the key change noting a weakening of the Strategy with the removal of the ZEZ, with no compensatory action to achieve targets; concerns were expressed that this would result in failing to tackle air pollution and that we should pursue alternatives (63 online comments).

Further comments were made on:

• Data showing improvements to air quality are unreliable and over-played

• A misplaced confidence in electric vehicles.

Summary response and changes

In response to the challenges around weakening of the Strategy the robust data provided on ULEZ measures show that these have led to a significant improvement in air quality, with just 7% of the City exceeding the legal NO2 limit of 40 µg/m³ in 2022, compared to 33% in 2019 when commitments to zero emission zones were made. Data on air quality is verified by TfL and the Department for Environment, Food and Rural Affairs (DEFRA).

With nitrous oxides having been reduced in the Square Mile, our priority will now be on introducing very localised emissions-restrictions in the remaining 'problem areas' where appropriate, and working on overall traffic reduction measures to achieve further improvement. PM10 and PM2.5 require wider area approaches as are transboundary pollutants, being affected by weather and wider area pollution.

It is noted that the next generation of road user charging is still at an early stage of development, without certain dates to implement, however the Mayor of London has commenced engagement and we will support the development and delivery of this as it is an appropriate way to manage traffic on our streets.

We have based our EV infrastructure targets on forecast demand. Our EV Charging Infrastructure action plan will be updated in 2024 to reflect targets to 2030, therefore the future number is likely to increase. The EV charging infrastructure plan will also be updated to reflect a consideration of charging for larger vehicles, and awareness of innovative approaches where possible.

Proposal 30 has been **updated** to include consideration of mobility scooters in provision of EV charging.

Outcome 7: Delivery and servicing needs are met more efficiently, and impacts are minimised

Deliveries and servicing are an essential part of a thriving business district. Delivering the Transport Strategy will ensure these needs are met by fewer, quieter, safer and cleaner lorries and vans. Deliveries for buildings or areas of the City will be grouped together at consolidation centres, meaning fewer, fuller vehicles The lorries and vans making these deliveries will use the return journey to transport waste and recycling. The Thames will also carry goods into the City as well as waste out, including the materials needed for construction projects. Logistics hubs within the City will enable deliveries to be made by cargo cycles and pedestrian porters. Cargo cycles will also be used for servicing businesses and buildings, with tools and parts securely stored at locations within the Square Mile. New technologies will help improve the routing of deliveries and make it easier to find a place to park or unload.

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 7 – 'Delivery and servicing needs are met more efficiently, and impacts are minimised'. A summary of proposed changes to the text of Proposals 38-39 are listed below.

- Remove the commitments to deliver five last mile logistics hubs by 2025, instead working with BIDs and neighbouring boroughs to identify suitable sites, including potential sites within the City.
- Remove the commitment to deliver a sustainable logistics consolidation centre by 2030. Instead, we will encourage consolidation through the planning process by requiring developments to consolidate vehicle deliveries and servicing trips as a condition of their planning application.
- Update our aim to establish a collaborative procurement programme for small and medium-sized businesses by 2022 to 2028 and work together with BIDs to trial collective delivery areas, where deliveries and servicing activities are consolidated into as few operators as possible.
- Promote the role of rail in reducing the number of freight vehicles in the City and across London and work with Network Rail to identify any opportunities for inward freight at railway stations in the City.

Key change - feedback on the proposal to remove the commitment for the City of London Corporation to provide a consolidation centre

This proposal was included in the Key Questions section of the consultation where a total of 334 people responded, and views to remove the commitment to introduce a consolidation centre were divided. 160 people (48% of respondents) felt that they were undecided in relation to this. 84 people (25%) agreed and 90 people (27%) disagreed with the change to this proposal.

From reviewing the comments and reasons given, there was some confusion in understanding the proposed change. We are removing a commitment to provide a City Corporation run/subsidised consolidation centre, not removing our commitment to support the use of consolidation centres and using initiatives to do so. Some comments evidently thought the latter. We expect that this has impacted responses, drawing more disagreement and negative comment. We also note that we had a high number of undecided responses to this question.

We are committed to reducing freight traffic on the City's streets, and support the use and promotion of consolidated deliveries and consolidation centres. However, as consolidation centres are provided by the market, there is not a need for the City Corporation to invest or develop its own consolidation operation. We continue to promote and encourage consolidation as set out in the proposal text. We will make sure the final text is clear.

Feedback on the Proposals and proposed changes to the 'More Efficient Freight and Servicing' Outcome

Proposals to improve efficiency in freight and servicing proved unpopular with 10 people (45% of consultation participants) disagreeing with the proposals, compared to nine (41%) in agreement.

Expressions of support for the proposed changes

The organisations listed below expressed their support for proposals within this Outcome and made no specific suggestion of requests for changes:

- The **PLA** supported the emphasis on the need to promote use of the Thames for light freight.
- The **CPA** noted the complex needs for freight and servicing and supported the City's pragmatic approach to reducing the number of freight vehicles.

- The **CPA** welcomed working with BIDs, occupiers, Network Rail and logistics providers and that this will lead to more goods and services being delivered by cargo bike, rail and river. It was also noted that developing new technology and smart systems will assist in the achievement of this.
- TfL supported the aim to increase the use of cargo bikes and encourage freight travel on foot for local deliveries.

From the online consultation, a number of comments were received that supported the proposed changes to the Delivery and Servicing outcome. Comment themes included, that:

- The proposal was strengthening measures to reduce motorised road freight, and promote freight into London by rail
- Adding requirements for consolidated deliveries to planning consents is a positive move
- It was welcomed to prioritise reducing deliveries at night (between 11pm and 8am) given the disturbance and noise inflicted on residents.

Some comments from the stakeholder workshops, which support the principles but suggested potential improvements by:

- Providing increased access to loading bays/kerbside deliveries are more efficient at higher speeds.
- Consideration of a pilot scheme to digitally record all highway traffic regulation orders and create, for example, bookable loading bays potentially revolutionising servicing and its management in the City.

Expressions of opposition to the proposed changes

A number of comments in the consultation and through broader stakeholder engagement opposed the changes to proposals in the freight and servicing outcome. These were mainly relating to a reduction in the level of ambition, to the removal of the commitment to fund and deliver a freight consolidation centre, and further that the City Corporation was removing commitments and failing to replace them with new commitments.

Comments were received noting that not all deliveries can be consolidated, and that existing buildings would not be made to meet the same standards as new buildings through the planning decision process.

Summary response and changes.

As noted above there was some confusion over the intention of the change to providing a consolidation centre and similarly, regarding the change to reduce the number of last mile logistics hubs introduced directly by the City. Reading the detailed comments, a number of respondents had taken this to mean a removal of the support for the principle of hubs.

We remain committed to both concepts but are reducing the direct commitment by the city to provide a consolidation centre and last mile hubs. It is not considered necessary or good value for money for the City Corporation to provide something the market is already doing.

Supporting actions will still be delivered by the City and should assist in meeting the freight vehicle reduction target.

Refurbished buildings and existing buildings will be encouraged to operate consolidated delivery, some of this can be achieved through planning conditions. Voluntary area-based consolidation is being developed in partnership with two of the BIDs during 2024, and further opportunities will be sought.

We do recognise that not all deliveries will be able to shift to a consolidated delivery system, but that we should still aim to support changes where possible.

No changes will be made to the proposals in this outcome.

Outcome 8: Our street network is resilient to changing circumstances

Occasional disruption to people using our streets and transport networks is inevitable. This includes disruption caused by construction and streetworks, breakdowns and severe weather. By delivering the Strategy, we will ensure that these disruptions have as little impact on the ease and experience of travelling in the City as possible. Streets will be kept open to people walking and cycling during construction and streetworks. Long-term works that require streets to be closed to traffic will provide an opportunity for people to enjoy the benefits of a traffic-free environment, and to assess the potential for permanent change. When necessary, alternative routes will be made available for motor traffic on streets that are normally only used for access. The Square Mile will be prepared for the impacts of a changing climate or more extreme weather events; enabling people to comfortably use the City streets regardless of the weather.

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 8 – Our street network is resilient to changing circumstances, proposals 40-42. A summary of proposed changes to the text of Proposals 40-42 are listed below:

- Revise our proposal on making the City's streets resilient to severe weather events to include commitments from the Climate Action Strategy and the Biodiversity Action Plan.
- We will install sustainable drainage where possible and appropriate on our streets to absorb rainwater runoff and provide more greening.
- We will plant more trees on City streets and gardens, with at least 100 new climate resilient street trees to be planted by 2025. These will provide shade and shelter and absorb carbon from the atmosphere.
- We will increase the amount of permeable street surfaces, where possible, to minimise rainwater runoff, which helps to mitigate flood risk in the City.

Feedback on the Proposals and proposed changes to the 'Resilient Streets' Outcome

The consultation response to the 'Resilience' outcome received more support than opposition.

Proposals to make streets more resilient received support, although many respondents were undecided. 10 of the 18 respondents agreed with the changes, compared to only three that disagreed. Five respondents neither agreed nor disagreed with the changes and enhancements to the outcome.

Since the 'Resilience' outcome contained few changes, and changes were to align with other City Corporation adopted strategies such as the Climate Acton Strategy, we did not include anything in the Key Changes section, therefore those that responded to the 'Resilience' outcome would have included those with a particular interest on the topic.

Expressions of support for the proposed changes

Ten consultation respondents supported the changes to the Outcome.

Online comments included:

- Value of recognising resilience within design.
- The need to measure physical changes against cost and carbon impact.
- Welcoming the acknowledgement of increasing issues with flooding in the context of continued development of ground space.
- Welcoming tree planting.
- · Welcoming increased drainage.

Comments expressing concerns related to this outcome or proposals.

LCC suggested that the City Corporation could learn from TfL through their initiatives to reduce road danger and local amenity as a consequence of road works and construction sites.

Feedback received through drop-in session engagement highlighted the importance of frequent and costed maintenance of any additional greening measures installed on City streets.

Expressions of opposition to the proposed changes

Only three respondents expressed opposition to the Outcome changes, and an online comment expressed that we were overprioritising climate polices and modelling at the expense of transport and other issues such as crime. This point was not elaborated on any further.

Summary response and changes.

The City Corporation has signed up to deliver a reduction in carbon and to produce a more climate resilient public realm and street network, this is a corporate priority.

No changes will be made to the proposals in this outcome.

Outcome 9: Emerging technologies benefit the Square Mile

The advent of new transport technology innovations, such as autonomous vehicles (AVs) and new apps and services, promise to change the way our streets function and the way we choose to travel on them. Delivering the Strategy will ensure that transport innovations are seamlessly integrated into the fabric of the City and improve the experience of travelling and spending time on the Square Mile's streets. A proactive rather than reactive approach to policy making will ensure appropriate policy and legislation is in place while supporting and accelerating beneficial innovations. The City will be a test-bed for urban transport innovations and seen as a world leader in improving people's personal mobility and livelihoods through new technologies.

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 9, proposals 43-45. A summary of proposed changes to the text of Proposals 43-45 are listed below:

- Remove the commitment to establish a Future Transport Programme and associated action plan and to lead on developing future technology in transport. Instead, our emphasis will be to engage with innovators and be open to opportunities to support and facilitate new innovations that are in line with our principles and objectives.
- Remove the commitment to establish a Future Transport Advisory Board, instead seeking more targeted additional expert advice as needed.

Feedback on the Proposals and proposed changes to the 'Emerging technologies benefit the Square Mile' Outcome

The consultation response to the 'Emerging technologies benefit the Square Mile' Outcome received more support than opposition. 18 people responded to this, with nine consultation participants agreeing with these Proposals and Outcome changes. Five people disagreed with them. Most of the negative comments raised were concerns about how this Outcome will manage the challenges, rather than strong opposition, these comments are set out below.

Since the 'Emerging Technologies' Outcome contained few significant changes, or changes that simply reflected updates following progress since the publication of the Strategy, we did not ask anything in the Key Changes section. Those respondents that commented in the 'Emerging Technologies' outcome are likely to have included those with a particular interest in the Outcome.

Expressions of support for the proposed changes

Nine of the 18 respondents and the **City Property Association (CPA)** expressed their support for changes to the Proposals within this Outcome:

Some of those respondents highlighted particular reasons for their support, including:

• **CPA** expressed support for finding app-based solutions that would allow disabled passengers to use taxis in instances where traffic restrictions would otherwise prevent access.

Support for the principle but with concerns around impact of changes to the proposal, were expressed in the following comments:

- CPA noted acknowledgement that over the coming years, great strides will be made in the availability of technology that can support the objectives of the Transport Strategy and Destination City. This includes, but is not limited to, driverless vehicles for deliveries/freight consolidation. Noted a need to reflect this in the proposed changes, with the City Corporation leading the way in the innovation and use of technologies that can support the City's growth
- Risk of the City of London falling behind on technology in the absence of a future-focused team
- LCC suggested that regulation of dockless cycle and scooter schemes should not undermine their viability and the City Corporation should help to ensure this
- Improved management of electric and driverless vehicles is required
- Over-emphasising technology can lead to misplaced surveillance and control

• The proposals require further clarity on the use of 'droids'.

Summary responses and changes

In response to the point ensuring improved management of electric and driverless vehicles, whilst this is expected to be regulated at a national level, the Strategy already states that we will ensure emerging technology will be adopted in line with delivering Healthy Streets, and have stipulated a number of requirements in proposal 43 to ensure that technology supports and does not undermine our core Vision and Aims.

Proposal 43 has been **updated** to reflect the need to accommodate every user where possible, adding those with sensory impairments.

The explanatory text for this proposal 43 contains some further detail on droids.

Outcome 10: The Square Mile benefits from better transport connections

Public transport will remain the main way that people travel to the Square Mile and continued investment will ensure that the City remains one of the most well-connected business districts in the world. Public transport will provide efficient and direct 24-hour connectivity to major local, regional, national, and international destinations. The building of new rail and underground connections will provide the additional capacity people need to get to the City quickly and comfortably from across Greater London and the UK.

Respondents were asked to indicate their support or opposition to the policies and actions under Outcome 10 'The Square Mile benefits from better transport connections', Proposals 46 - 51. A summary of proposed changes to the text of Proposals 46 - 51 are listed below:

- We committed to work with river service operators to encourage more affordable fares on river services to align with the remainder of the public transport network.
- We updated proposal 47 to reflect the opening of the Elizabeth Line and the extension of the Overground to Barking Riverside.
- We updated proposal 47 to include reference to support for rail freight and additional passenger services on the River Thames which now stretch to Essex and Kent.

Feedback on the Proposals and proposed changes to the 'Better Transport Connections' Outcome

The proposed approach to better transport connections attracted mixed feedback from the online consultation respondents. Nine people (36% of respondents) agreed with the outlined approach, but seven people (28% of respondents) disagreed with the approach, with a further nine people (36%) neither agreeing nor disagreeing. Only one question was asked of respondents under this outcome, as a result of few changes being made to the proposals, and no Key Changes.

Expressions of support for the proposed changes

Nine of the 25 respondents, along with the organisations listed below expressed their support for changes to Proposals, and existing proposals within this Outcome.

- Port of London Authority (PLA)
- City Property Association (CPA)
- City of London Access Group (CoLAG)

Some of those respondents highlighted particular reasons for their support, including:

- The **PLA** would encourage the City Corporation to work with TfL and river boat operators to improve or intensify passenger services on the Thames
- The CPA welcomes the aim to prioritise buses and expects this will improve journey reliability for their users
- **CoLAG** welcomes better transport connections, if they are accessible and inclusive, noting there is no use in having an accessible City if people with access requirements cannot get there. Furthermore, CoLAG noted the importance not to reduce bus stops and bus routes to the City, as this would have a negative impact on people who cannot walk very far.

From the online survey, positive comments included:

- Applauding the proposals
- Prioritising bus journey times ideally accompanied by a review of parking arrangements on bus routes
- · Providing more river services
- · Linking trains to airports.

General expressions of concern

Comments were made raising concerns around the outcome and proposals as drafted, not specifically the changes to this proposal.

One comment was made on continuing airport expansion being inadvisable in the light of the climate emergency. It expressed a need for more detail regarding the rationale for this proposal (46) including the City Airport's capacity.

One comment was raised requesting the City Corporation fund feasibility studies on extension of the Waterloo & City Line to Liverpool Street and of the DLR to Farringdon or Euston, although noting that these are TfL services.

There was one online comment that river travel is not accessible.

With respect to the issue of the bus network and optimising bus services and routes, TfL noted that the Mayor's transport Strategy puts a key emphasis on bus travel to support the Healthy Streets approach and to provide an attractive whole journey experience that will facilitate mode shift away from the car. Therefore, stating that any proposal to optimise the number of buses travelling through the city or relocate bus priority space to other modes should be carefully considered in line with TfL's operational requirements and Healthy Streets policy.

On proposal (49) online consultation (six comments) also reflected concerns about the impact on buses, of changing bus routes, bus journey times for passengers, considering improvements on parking on bus routes, and doing more with traffic light sequences to benefit bus journey times.

Summary response and changes

Airport expansion is supported by the City Corporation in the context of allowing for appropriate growth in international travel while still bringing down CO2 emissions for that sector.

We regularly engage and work with TfL on projects that affect the City. In principle, the City would support improvements to the new connections through and to the City, resources do not currently allow the City to fund such a study, and any such study would more appropriately be carried out by TfL.

Accessibility improvements will be sought and delivered through the Riverside Healthy Streets Plan.

The revised text for proposal 49 includes a change to state we will optimise bus services rather than reduce those running through the City. This revision took into account comments the City received during the TfL consultation on removal of some services. We

agree that any changes or recommendations would be in consultation with TfL, and TfL's operational policy and the Healthy Streets Policy would be the framework for considering change.

No changes will be made to the proposals in this outcome.

Delivering the Strategy

The City of London Corporation will continue to champion the use of Healthy Streets Plans and other area strategies to coordinate and accelerate delivery on City of London streets. We will continue to monitor data around key targets, including on vehicular traffic reduction, road danger reduction, public perception, and others. We have amended targets where necessary, and added two new indicators to monitor progress on the Strategy.

Respondents were asked to indicate their support or opposition to the policies and actions under the section on Delivering the Strategy which includes performance indicators. A summary of the proposed changes to the text of Proposals 52-54 are listed below:

- We will change some of the key performance indicators we use to reflect new data collection methodologies
- We will add a key performance indicator and target for reducing carbon emissions from vehicle traffic in the City
- We will add a key performance indicator and target associated with the perceptions of City street accessibility for people of all ages and abilities.

Feedback on the Proposals and proposed changes to the 'Delivering the Strategy' Outcome

There was a balanced opinion in relation to the changes proposed in delivering the Strategy. Nine people (53%) of consultation participants agreed with these changes, this was closely countered by eight people (47%) in disagreement.

'Delivering the Strategy' did not contain any Key Changes. Most of the changes reflect updates. Two new performance indicators are included in the revised Strategy, one to cover users views of improvements in accessible streets, and to provide a more specific measure of contribution to carbon reduction from transport initiatives.

Expressions of support for the proposed changes

Nine out of the 17 respondents agreed with the changes to this section of the Strategy.:

Some of those respondents highlighted particular reasons for their support, including:

- Prioritising those who walk and use public transport.
- Focusing on reducing the number of motor vehicles (instead of a switch to EV usage)

Expressions of opposition or concern to the proposed changes

Eight out of the 17 respondents disagreed with the changes proposed, with comments around whether the balance was right on prioritising different vehicles, cycles and walking/wheeling.

- Failing to consider the needs of disabled and less mobile people as an integral part of the Strategy.
- Failing to recognise that older people may not wish/be able to walk/cycle to and around the City of London.
- Worsening safety for those who are forced to walk.

London Cycling Campaign (LCC) challenged the removal of proposal 52 to use temporary interventions to trial and refine transport measures. LCC suggests that the proposal be reinstated, or an alternative similar proposal introduced.

Summary response and changes

Comments made in response to delivering the Strategy were repeated comments that had been made around access issues for disabled or less mobile people. As noted in response to Outcome 1, access restrictions on the street network and traffic reduction are key to achieving more and better space for walking and wheeling, and the Strategy sets out to prioritise space for these people. Access by vehicle to all locations is possible for those who cannot walk or wheel. We accept that for some, the journey may be made longer due to reallocation of street space or point access restrictions. We endeavour to find app-based solutions when one is available to providing taxi access for disabled passengers through restrictions.

Whilst we have amended proposal 52 to no longer use temporary interventions that are not cost effective, we will continue to trial traffic management measures where appropriate.

No changes will be made to the proposals in this outcome.

Managing Traffic Movement and Access

Respondents were asked to indicate their support or opposition to the proposed approach to Managing Traffic Movement & Access. We are proposing a framework for how we will manage traffic movement and access to enable delivery of the Transport Strategy (under Outcome 2: Street space is used more efficiently and effectively).

The following statements set out our approach for managing the allocation of space and allowing access for the different types of traffic on the City's streets. This supports Outcome 1 and 2.

- Walking and wheeling is the main way that people travel around the City and will be prioritised accordingly, with more space and priority.
- Cycling the City Corporation will seek to maximise the choice of safe & convenient routes for people cycling, where it does not conflict with the need to prioritise people walking. We will allow cycling on most streets.
- Scooters and e-scooters scooters will be treated in the same way as cycles in terms of street space and access. Private e-scooters are not permitted to use public highway at present.
- Buses the City Corporation will prioritise bus traffic, but this will be through traffic reduction rather than space allocation.
 Dedicated bus priority space may be needed for reallocation to pavement widening.
- Taxis taxi access will be considered on a case-by-case basis, separately to other vehicles, with accessibility implications reviewed through a project's Equalities Impact Assessment (EqIA).
- Freight & Servicing freight and servicing vehicles with a destination in the City are essential traffic and we will seek to maintain access where possible.
- General Traffic all streets (except on pedestrianised or bus and/or cycles only sections) will continue to provide space for general traffic.

Feedback on the proposed approach to the 'Managing Traffic Movement and Access'

The proposed approach to 'Managing traffic movement and Access' attracted mixed feedback. 11 people (41% of respondents) agreed with the approach, but this was exceeded by 13 people (48%) who disagreed. This was a relatively small sample of respondents, with 27 in total, they provided 17 free text comments, both positive and negative.

Expressions of support for the proposed changes

From the online consultation, a number of comments were received that supported the proposed approach to traffic movement and access. Themes included, that:

- It was positive to see a street hierarchy included in the Strategy.
- It is important to prioritise those who walk and those who cycle.

Further comments were received that supported the proposed approach to traffic movement and access but encouraged us to go further. Comment themes included, that:

- It would be important to legalise private e-scooters as safe and efficient ways to move around
- The City should consider increasing the number of clean buses
- The approach should ensure signage clarifies where service vehicle access allowed
- The approach and Strategy is providing insufficient traffic calming and restrictions in high density residential areas such as the Barbican
- The City Corporation should consider free pedicabs circulating within the City.

Expressions of opposition to the proposed changes

There are negative comments relating to how the Transport Strategy prioritises some modes of travel, with a challenge received on the relative prioritisation of taxis that they should be given higher priority than other vehicles.

Comment themes included that the proposal was:

- · Restricting blue/red badge accessibility
- Restricting taxi access

Failing to address the need for black cab access.

Concerns on the impacts of the approach.

Comment themes included that the proposal was:

- Dictating travel mode choice, and punishing car/delivery drivers
- · Displacing traffic into neighbouring boroughs
- Harming business/making the City less competitive/driving up consumer costs
- Causing the City of London to become less attractive

Motorcycle Action Group (MAG) challenged the proposed approach to traffic access and movement on the basis that powered two wheelers are included within general traffic, and that they merit different consideration in that 'licenced PTWs are a part of the two wheeled transport continuum from bicycles to e-bikes and e-scooters and e-cargo bikes'.

Summary response and changes

The approach intentionally creates a framework for how we will manage different modes of transport in the City. There is no evidence that the approach will displace motor traffic into neighbouring boroughs. At the core of the Strategy is the approach to reduce motor vehicles as far as possible, whilst retaining essential access to allow businesses to continue, including finding alternative approaches to deliveries. Reducing traffic allows street space to be made more comfortable and attractive primarily for those walking and wheeling.

Traffic restrictions do apply to blue and red badge holders, however this does not prevent access to any location in the City, although it may make some journeys longer requiring alternative routes. Traffic restrictions do not stop access to disabled parking.

We will continue to work closely with TfL and lobby central government to achieve the changes to deliver further improvements in the City, including on buses and bike/scooter hire schemes. TfL have set targets for transition to all buses being hydrogen or electric. We are working with TfL and London Councils to provide a better framework for managing hire bike and scooter schemes.

We have **updated** the different types of traffic on the City's streets, to include an additional category, of L category vehicles, which includes powered two wheelers, mopeds, motorbikes, (see <u>DVLA definition</u>). We consider that although vehicles in this classification are still private transport, there may be some circumstances where we wish to differentiate locally for the purposes of access.

Conclusion

The analysis of consultation responses has covered all methods of communication during the consultation period. This included individual correspondence from organisations, stakeholder workshops, one to one meetings where appropriate and the online consultation through the 'Commonplace' platform.

Outcomes and Proposal have been updated following consultation on the draft changes to the Transport Strategy. These are:

- Proposal 1b
- Proposal 20
- Proposal 21
- Proposal 22
- Proposal 30
- Approach to Managing Traffic Movement and Access.

All changes to Outcome and Proposals made following feedback from this report can be viewed in the revised Transport Strategy.