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Dear Elly,

## **Response to Quality streets report: Improving London's pavements**

Thank you for sharing the London Assembly Transport Committee's report 'Quality streets: improving London's pavements' and thank you again for inviting us to speak at the session held on 25 September.

Transport for London (TfL) knows that most journeys begin and end on the pavement, and most journeys that Londoners make remain on our streets. Walking and wheeling as a means of transport is healthy, sustainable and affordable, and TfL wants to be the most walkable city in the world.

I am responding on behalf of myself and Helen Cansick and we have addressed each of the recommendations in turn below.

TfL has also included an update to the Committee on our Walking and Wheeling Action Plan 2 at the end of this letter.

### **Recommendation 1**

**TfL should commission and publish research on the reasons behind the plateau in walking trips, as well as the barriers to wheeling, and use this as the basis for a new Walking and Wheeling Action Plan, to be published in 2026.**

We agree that understanding the factors behind walking and wheeling trends is essential for shaping effective interventions. TfL maintains an extensive public repository of reports and datasets including the London Travel Demand Survey (LTDS), Travel in London Report, Annual Report & Statement of Accounts and an annual progress update on how it is delivering the Mayor's Transport Strategy. TfL's published surveys tend to be large, statistically governed, and designed for long-term planning — such as the London Travel Demand Survey (LTDS).

We also already undertake regular research into motivators and barriers to walking and wheeling through our Customer Insight programme. This helps us understand attitudes and behaviours across different groups and informs the development of targeted actions.

In addition, we have commissioned specific research on topics such as crossing the road and accessibility, and we continue to build on this evidence base.

This ongoing research and engagement will underpin the Walking & Wheeling Action Plan to be published in 2026, ensuring it is informed by robust evidence and reflects the needs of Londoners.

### **Recommendation 2**

**TfL should include estimated daily wheeling trips as part of its annual 'Travel in London' reports.**

It is not currently possible for us to provide an estimate of wheeling trips separately to the estimate of walking trips that we already provide (which includes wheeling trips) in our Travel in London reports.

The main reason is that we do not currently have a source of data that can easily and reliably differentiate walking trips from wheeling trips. The fact that there is not yet a clear notion of what constitutes 'wheeling' among the general public also means that it would not be easy to make changes to our existing surveys to address this issue.

However, we will continue to monitor best practice in the industry and consider options to improve these data sources in the future.

### **Recommendation 3**

**During 2026-2027, TfL should launch an awareness campaign for FixMyStreet and Streetcare, which encourages the public to use these tools to report instances of street clutter or damaged pavements and where these issues have caused them to be injured.**

Safety remains our number one priority, and we understand the importance of an accessible tool for people to be able to report issues and incidents to us. TfL follows national guidance and inspects its pavement network every 2 years and use this data to inform pavement renewals. This is a best practice approach.

This is why we have prioritised making it as easy as possible for people to report a problem through Streetcare, to ensure the safety of our network is maintained. We have a dedicated [webpage](#) for people to access our Streetcare tool. The webpage sets out what issues Streetcare can be used to report and includes a link to [streetcare.tfl.gov.uk](https://streetcare.tfl.gov.uk).

We ran a poster campaign on bus shelters in 2021 to promote StreetCare. The link to Streetcare is also printed on information panels in bus stops and shelters and on stickers on some of our street assets. We will continue to promote awareness of the

service on information panels in bus stops, posters and also share details of how to use both sites in customer services and stakeholder correspondence. We will also look to include a link to FixMyStreet on the Cycle Sundays online hub so new cyclists can report any issues as they cycle over the summer.

Streetcare currently includes a damaged pavement category and a way to report hire e-bike/scooter, scaffolding and other street furniture that obstructs the footway.

Complex complaints, however, need to be reported to TfL Customer Services directly. For personal injury claims, claimants are asked to go through our claims handlers Gallagher Bassett, who will assist with any complaints about personal injury which we may be liable for. Claimants are provided with a referral form and contact information by TfL Customer Services. Streetcare is not the appropriate mechanism for this.

#### **Recommendation 4**

**TfL should use the increase in data received through promoting FixMyStreet and Streetcare to map the scale of pavement maintenance required in London and use this to lobby government to provide ringfenced funding for pavements.**

We currently carry out detailed visual inspections of our footways on the Transport for London Road Network (TLRN). This data, along with defect data collected through safety inspections, enables us to identify locations for renewals.

The London Technical Advisory Group (LoTAG) is formed of representatives from TfL and the London Boroughs. LoTAG and its sub-groups aim to provide coordinated and comprehensive advice and support the management of highways in London.

LoTAG has sponsored the development of the annual State of the City report since 2017. Using asset information, the report highlights London's maintenance backlog across highway assets including footways.

Understanding the scale of London's highway asset and the investment need helps to inform investment strategies across the capital. Continuing this work annually builds a robust investment case for London.

The success of the report has led to additional maintenance funding being allocated to the boroughs and TfL.

Therefore, we are confident that we already have the information required to understand the scale of pavement maintenance required on the TLRN, and, working with LoTAG we communicate this to the DfT. FixMyStreet and Streetcare provide a valuable function for highlighting immediate safety concerns that occur between routine inspections, enabling prompt resolution. The information gathered from these sources is not suitable for broader asset management planning purposes. We are aware that other industry groups are pushing for higher, longer-term and ring-fenced funding at a national level, and we would support any action from the Government to meet this call.

### **Recommendation 5**

**TfL should consult with boroughs on an agreed approach to street clutter, which includes e-bikes, e-scooters, A-boards, rubbish bags, phone boxes, electric vehicle charge points and cables. This agreed approach should include assessing whether TfL's Operation Clearway can be deployed to all pavements in London and the cost of doing so. If agreed and funded, TfL should then consult with government on devolving the necessary powers to make this possible.**

While the proposal to address street clutter aligns with our strategic influence and Healthy Streets agenda, we are only able to enforce on TfL's own road network. It is only the London boroughs who can enforce on their own roads, which together represent the majority (95%) of London's roads.

Since 2015, TfL has removed over 4000 pieces of unnecessary street furniture across the TfL Road Network. We do have processes, including inspection processes, in place for the TRLN which allow us to report highway obstructions like A-boards, e-bikes and e-scooters. The Environmental Protection Act (EPA), which sets out that it is the responsibility of boroughs to remove litter, regardless of who the highway authority is, can create a challenge where an issue may fall under EPA cleansing duties and is therefore the duty of the local authority. We are currently developing a process to clarify the legal stance on this.

Our statutory and preferred approach on this agenda is to lead policy and coordination, to set standards and share best practice for each London borough to consider in their own enforcement approach. We do this through:

- Promoting our Healthy Streets Approach and our Streetscape Guidance document (see response to Recommendation 6) that set a vision and standards for London streets to protect the safety and accessibility of our streets for all Londoners.
- Leading by example through the establishment of enforcement policies and programmes on our own Transport for London Road Network (TLRN), sharing our approach and learning with London boroughs and exploring opportunities to collaborate.

Regarding Operation Clearway: This high impact programme, targeted at addressing high priority concerns of A-boards and dockless e-bikes, is justified where we need to ensure network reliability at a city scale, but should remain exceptional, targeted and corridor based. Its principles, however, and our learnings can be shared and adopted as borough-led tools. Indeed, in our recent expansion of the programme to dockless e-bikes, we have shared our updated enforcement policy and approach with the London boroughs, regularly share our experiences and continue to explore opportunities to coordinate on enforcement opportunities.

Rather than call for an expansion of powers, which would have to be evidence-led, borough-backed and have funding clarity, we welcome the opportunity to continue to strengthen our coordination role on this matter across London with our London

borough partners, furthering our role as custodian of the transport system, rather than manager of every pavement.

While phone boxes and utility boxes are not reportable on Streetcare, we do have a process in place for engaging with BT and reporting damaged and poorly maintained boxes. While we have not previously secured approval of this, we would be open to exploring the addition of boxes to Streetcare with BT and other providers. TfL has also been lobbying BT to improve phone box maintenance as we don't see the current levels as acceptable.

### **Recommendation 6**

**As part of TfL's review of its design guidance and principles, it should ensure that future iterations of any street-related guidance and toolkits should:**

- **ensure those responsible for designing streets prioritise the provision of accessible and inclusive facilities such as seating; shelter, including greening; and public toilets**
- **outline how co-design principles should be embedded into the design of streets.**

### **Designing streets**

We have developed and implemented street design guidance, aligned to the Mayor's Transport Strategy (MTS), aimed at creating high-quality public spaces and walking environments for all users. This guidance supports a wide range of improvements, from small-scale decluttering and safety enhancements through to major streetscape transformations.

We enforce our guidance where we act as the highway authority and asset manager and we encourage boroughs to adhere to our guidance when delivering LIP funded schemes. For streets and roads outside of the TLRN, many boroughs have their own street design guidance, setting expectations and requirements within the overall framework of national and London-wide guidance. We recognise and accept that boroughs should retain this responsibility, reflecting local policies and community needs. We will continue to monitor our streetscape guidance and, where necessary, make updates to ensure best practice remains the standard. We are currently working with boroughs to gather feedback on our street guidance and how it can be better embedded into local processes and decision making.

The relevant documents include:

The **Healthy Streets Approach** is embedded into the MTS and London Plan and recognises the importance of creating streets that are inclusive, safe and support health and wellbeing. The framework seeks to remove barriers that prevent people, particularly our most vulnerable community members, from accessing London's streets. The approach is underpinned by 10 evidence-based indicators, which are used to guide the design and evaluation of streets through the Healthy Streets Check. The indicators outline requirements for pavements, seating, shelter and green infrastructure, such as trees and Sustainable Urban Drainage Systems.

The Healthy Streets Check is expected to be used for all Healthy Streets infrastructure schemes we fund to assess and demonstrate the benefits of the scheme.

The **Streetscape Guidance** (2022) sets out the requirements for the design of the TLRN. Linked to The Healthy Streets Approach, it provides detailed guidance for good design, material selection, installation and maintenance of roads and streets including footways and amenities, carriageways, crossings, kerbside activity, street environment and transport interchanges. While the guidance is specific to the TLRN, the principles are applicable to all streets in London and can be used by a range of stakeholders throughout a project lifecycle.

Boroughs are generally responsible for the planning, siting and design of **public toilet facilities**. Our Equity in Motion Plan (2024) recognises the need to improve the provision and accessibility of public toilets across the transport network. While not specific to streetscapes, this commitment complements wider efforts to create inclusive, comfortable and accessible public spaces for all.

### Co-Design principles

We support the principle that London's streets should be accessible and welcoming for all and we have a long history of encouraging inclusive engagement and consultation across London. As an example, our guidance document 'Small Change, Big Impact' (2017), which promotes community involvement in light-touch interventions in the public realm, helped shape the approach to local street space reallocation projects during the Coronavirus pandemic and continues to inspire community involvement in small-scale schemes.

We agree that co-design represents a more inclusive way of achieving accessible streets for all, and that embedding co-design into street design guidance is an important ambition that aligns with our commitment to equity and inclusion. One of the actions in our most recent [Equity in Motion report](#) to build a fairer, more inclusive transport network, included an Inclusive Design Centre for Excellence (IDCfE) to support the improvement of inclusive design practice across the organisation. Through the IDCfE we will empower colleagues with the knowledge and skills to ensure transport works for everyone, by offering expert guidance, tools, training and providing space for collaboration. We will use this to identify processes and ways of working that ensure inclusion has been considered throughout the project lifecycle.

We are exploring methods to engage earlier with stakeholders on our plans for transport investment. A good example is a recent project to test a Women's Safety Audit methodology. This is focused on applying the principles set out in the 'Safety in Public Space' guidance issued by the GLA to streets and public realm as influenced by us and other stakeholders. It promotes dialogue with women, girls and gender-diverse people in the planning process, particularly in shaping outcomes and requirements for street improvements in the early stages of the project lifecycle, informing options and proposals. We will publish a report on this pilot project later this year. We are also undertaking a trial into early community engagement on a broader level, focussed on healthy streets schemes. This will trial approaches to public participation, bringing local people earlier into decision-making processes and breaking down barriers to engagement with London's diverse communities.

## **Update to the Committee on the Walking and Wheeling Action Plan 2**

Our first Walking Plan, published in 2018, set out our vision that London should be the world's most walkable city. Since publication, we have delivered many of the actions within the plan.

It's now time to update the Walking Action Plan. The new Walking and Wheeling<sup>1</sup> Action Plan (WWAP) will supersede the 2018 Walking Plan with a broader, more ambitious remit.

The new plan will focus on meeting the following objectives:

- Promoting health & wellbeing,
- Driving high streets & wider economic growth, and
- Ensuring the benefits of walking and wheeling are enjoyed more equally.

Alongside our helpful discussion on 25 September, we have been engaging with a range of stakeholders to find out about the barriers people face when walking and wheeling in London, and what further action could be taken to encourage Londoners to walk and wheel more. Identifying these priorities has helped us to shape the plan, and effectively develop actions areas that target these priorities.

To achieve our objectives, we expect to have six focus areas for action. They build on the approach and actions we set out in the first plan and help us to identify the challenges and opportunities we face now and in the coming decade.

Our six focus areas (draft and subject to review):

1. Transforming London's places and neighbourhoods by making the walking and wheeling environment safer and more attractive. Actions will focus on improving High Streets and town centres to create high quality walking and wheeling environments
2. Reducing severance and improving connectivity. Actions will focus on reducing severance for those wanting to cross the road, improving connections between walking, wheeling and other modes of public transport and improving wayfinding
3. Making walking and wheeling more inclusive so that everyone can enjoy the benefits. Actions will focus on removing barriers and obstacles to walking and wheeling and designing and maintaining safe and inclusive streets
4. Getting even more of London's children and young people walking and wheeling. Actions will focus on creating behaviour change and promoting walking and wheeling as the top transport mode for school travel

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<sup>1</sup> Wheeling: the use of pushchairs (buggies), kick-scooters, wheelchairs, mobility scooters and other wheeled mobility or carrying aids.

5. Walking and wheeling for leisure – connecting green spaces. Actions will focus on creating new pedestrian routes which connect London's waterways and green spaces
6. Being ready for the future. Actions will focus on providing a series of measures that will address climate change adaptation needs and improve data collection

The WWAP is due to be published in in the coming months. Boroughs will be key partners in delivering the plan as they control 95 per cent of London's streets, and communications plan is currently being developed which will encourage support and advocacy from key stakeholders and delivery partners.

Thank you for providing us with the opportunity to respond to these recommendations.

Best wishes,

Will



**Will Norman**  
Walking & Cycling Commissioner