

MAYOR OF LONDON

Caroline Russell AMCity Hall
The Queen's Walk
More London
London SE1 2AA**Our ref:** MGLA041217-6440**Date:** 26 MAR 2018**Hostile Streets: Walking and Cycling in Outer London Response**

Thank you for your letter of 5 December 2017 inviting me to respond to the '*Hostile Streets: Walking and Cycling in Outer London*' report. I understand you also wrote to Mike Brown: please consider this a response from us both.

The report rightly highlights some of the challenges Transport for London (TfL) and London boroughs face in making outer London's streets more inclusive and safer, and in encouraging people to be more active as part of their day to day life.

Overcoming these challenges is fundamental to the successful delivery of my Transport Strategy (MTS). My Strategy aims for 80 per cent of all journeys in London to be made walking, cycling and on public transport. Without making London's streets safer and inclusive for vulnerable road users that target will not be achieved. I therefore welcome this opportunity to provide further detail on the Healthy Streets Approach and how London's streets will be made more appealing. The Healthy Streets Approach will provide an overarching framework to inform TfL's decision making. It also forms a key part of guidance to boroughs developing their Local Implementation Plans.

Your report focuses on streets and junctions in outer London, an area particularly dependent on car use and where TfL's analysis shows huge potential for mode shift to active travel. This makes the application of the Healthy Streets Approach in outer London a priority, both on the Transport for London Road Network, and borough-managed streets.

I have included a detailed response to your recommendations in the enclosed document.

Yours sincerely,

**Sadiq Khan**
Mayor of London

Enc.

Recommendation 1

TfL should review the speed limits on all of its roads in line with the Healthy Streets Check. We ask for TfL to report back to us on its review by May 2018.

On 20mph limits, TfL should look to international best practice and carry out on-street trials in outer London to find ways that 20mph can be self-enforcing on main roads and busy junctions. TfL should write to us with a list of places in outer London for on-street trials by May 2018.

The Mayor should carry out a public information campaign to promote the work that the Metropolitan Police Service is doing to enforce 20mph. It must be clear to people that they can be caught and prosecuted for breaking 20mph limits.

Response

Minimising road danger is fundamental to creating streets where everyone feels safe walking and cycling. Road danger disproportionately affects people travelling on foot, by cycle or by motorcycle, with 80 per cent of all those killed or seriously injured on London's streets travelling by these modes. Safety concerns are the main reasons people give for not cycling more, and for being unwilling to let their children walk unaccompanied.

The Mayor's Transport Strategy (MTS) sets out the proposals for a Vision Zero approach to road danger, including the ambitious target of eliminating deaths and serious injuries from London's streets by 2041. Adopting Vision Zero will be central to the overall success of the Healthy Streets Approach.

Vision Zero means that road danger will be targeted at its source by ensuring the street environment incorporates safe speeds, safe people, safe street design and safe vehicles. It means reducing the dominance of motor vehicles on streets, and then making the remaining essential motorised journeys as safe as possible. The MTS proposes to introduce lower speed limits and improve compliance with speed limits through enforcement, information and appropriate training.

Currently, thirty-one per cent of streets in London have a 20mph speed limit. The majority are 30mph, the national urban default limit, with some 40mph, 50mph and 60mph limits in less residential and more orbital locations. TfL recognises that lowering speeds is fundamental to reducing road danger and is actively developing a strategy to increase the number of communities which will benefit from 20mph and speed reductions. Further details on implementing more 20mph speed limits, including findings from the trials of 20mph speed limits on the Transport for London Road Network (TLRN), will be provided in the forthcoming Vision Zero Action Plan.

Other actions that TfL is taking to address inappropriate speeds include:

- Working with boroughs and the Metropolitan Police Service (MPS) to encourage safe speeds through marketing communications campaigns.
- Working with the MPS to make greater use of a risk-based tasking methodology to deploy resources to places and at times where we know traffic offences, such as speeding, are more likely to happen.
- Encouraging local involvement in Community Roadwatch schemes – in which local residents use speed detection equipment under Police Community Support Officers' supervision to gather intelligence on speeding motorists.

- Installing average speed camera systems on the A40, A406, A316 and A2. These systems, as well as the spot speed system on the A13, also have rear-facing cameras to capture evidence of speeding motorcycles. This helps TfL to monitor the effect of speeding motorcycles on traffic collisions.
- Ensuring speed compliance through promoting in-vehicle technology and mandating fitting speed limiting technology to all new buses from 2018.

Recommendation 2

TfL should review its compliance with the Equalities Duty in respect of pavements, crossings and cycle lanes on the TfL Road Network

Response

TfL is committed to Inclusive Design, which goes beyond meeting its legal duties and is a core pillar of the draft London Plan and future Diversity and Inclusion Strategy.

TfL's design guidance documents provide best practice advice on street design and maintenance, developed through extensive research and analysis of best practice both in London and elsewhere. Each document prioritises network legibility and inclusivity. With Equality Impact Assessments carried out where appropriate, this approach ensures that investment programmes comply with the Equality Act 2010.

Our best practice and guidance has been developed in part through close engagement with key stakeholders, for example the Royal National Institute of the Blind and Wheels for Wellbeing. This relationship has been extremely valuable in further understanding the needs of specific groups as street designs evolve, and will be continued in the future.

In particular, TfL's Streetscape Guidance provides the tools to create high-quality inclusive links and places across London. While this guidance has been developed primarily for the Transport for London Road Network (TLRN), the principles are equally applicable to any street in London and can be used by Local Authorities in their street design. The design guidance documents are regularly updated by TfL to reflect the latest accessibility standards.

In addition, TfL developed The London Pedestrian Comfort Guidance in 2010. This guidance and associated tool aim to ensure the design of pedestrian footways and crossings are appropriate for the volume and types of user of that environment. TfL is committed to ensure its signal controlled crossings are accessible to all pedestrians by providing appropriate tactile paving, tactile rotating cones under the push button and adding audible warnings with the 'green man' invitation to cross, where it is feasible.

TfL always builds in accordance with its design standards but standards are continuously evolving and as a result some equipment may fall behind today's high standards. This means that some junctions and crossings may not meet current standards for walking and cycling facilities. However, when street equipment is due to be upgraded or replaced TfL ensures the latest inclusive design standards, as set out in the Streetscape Guidance, apply to the new assets.

By taking the Healthy Streets Approach, the Mayor and TfL aim to make London a more attractive place to walk, cycle and use public transport rather than drive. This is particularly important for older people, the very young, disabled people and people living on lower incomes, who disproportionately feel the negative impacts of living in a car-dependent city. The Healthy Streets Approach aims to make positive changes to our street environment in line with 10 Healthy Streets

Indicators. The draft London Health Inequalities Strategy details how each indicator of a Healthy Street relates to health inequalities.

To ensure new schemes delivered by TfL comply with the Healthy Streets Approach, and so become fully inclusive environments, TfL has developed the Healthy Streets Check for Designers ('the Check'). The Check assesses design proposals against all 10 Healthy Streets Indicators rather than one specific element. For example, the Check includes metrics assessing the footway width; walking surface quality; location and type of pedestrian crossings; and availability of places to sit and shelter from bad weather.

The Check will be applied to all TfL schemes within the Healthy Streets Portfolio, except the ones with no expected impact on people walking and cycling. In addition, TfL will work with boroughs to encourage and support their widespread use of the Check to ensure that their proposed schemes align with the MTS and the Healthy Streets Approach. TfL will lead activities, such as training sessions on the Check for borough officers, developers, contractors and advocacy organisations, to significantly increase its application to schemes that are likely to make a big change to people's experience of the street environment.

TfL will also publish its Walking Plan later this year, as well as further technical guidance on designing streets for pedestrians. This information will be included in a new update to the TfL's design guidance documents and will be in line with the Healthy Streets Approach. The inclusiveness and accessibility of the street network are core principals in the development of both these documents.

Recommendation 3

TfL should identify outer London junctions that cause problems of community severance, and run an improvement programme to resolve high risk road danger issues for people walking and cycling (as set out in the Healthy Streets check). This programme should also ensure that there are safe crossings where people want to cross. TfL should share a list of junctions for improvement with us by May 2018.

Response

TfL understands that there are community severance problems caused by London's roads and is working hard to rectify this. Addressing road danger and perception of safety is essential in reducing the severance effect of the road network. A traffic dominated street with fast moving traffic and poor crossing facilities may feel unsafe for people walking, who will therefore choose not to use this street or travel via other modes. To tackle dangerous junctions, TfL takes action at both the strategic planning and design stages.

To aid strategic planning, TfL has developed the Safer Junctions programme, which focuses investment on 73 junctions with the worst safety record.

The Safer Junctions programme recognises that well-designed junctions should themselves enable people to feel safe using them on foot or by bike. TfL is assessing what can be done to make these junctions safer, and will keep sites on the list under review. Twenty-one of these junctions have had work recently completed, 33 have work planned and 19 are now undergoing safety studies. TfL is also developing a new measurement for road danger that encompasses metrics such as collisions, casualties, traffic volumes and speeds, as well as more qualitative measurement of people's perceptions of safety. Any new junctions added to the programme will be identified based on where the greatest gains can be made in reducing risk and making people feel safe.

TfL is supporting boroughs in tackling road danger on their street networks. The analysis used for the Safer Junction programme is also run on borough streets and TfL provides annual updates to the boroughs on the list of junctions with the worst safety records. TfL encourages boroughs to address these junctions through Local Implementation Plan funding and interrogate boroughs on their engineering programme.

TfL and the London boroughs have done a lot in recent years to target and address key locations (e.g. Bow roundabout, Henley's Corner) but acknowledge that more work is still needed to improve walking and cycling facilities at some junctions in outer London. TfL is aware that there are locations where people want to walk or cycle but currently avoid doing so due to fear for their safety, and it is working to address this in its road danger reduction approach. TfL will publish more details about its approach to road danger in the Vision Zero Action Plan later this year.

The Liveable Neighbourhoods programme provides further opportunity for TfL and boroughs to work together to tackle barriers to walking and cycling across London, and the programme can include schemes that address severance and road danger. Seven projects have already been given the 'go-ahead' to proceed in November 2017, with further projects expected to secure funding in the years ahead.

In addition, TfL considers the impact of new schemes on Healthy Streets Outcomes (including increasing walking and increasing cycling), through the outcome definition process. This process reviews corridors where investment is taking place, and proposes where specific outcomes should be prioritised along the route, including addressing severance where appropriate.

At the design stage of a scheme, TfL has developed the Healthy Streets Check for Designers which can be used to identify and address some of the contributing factors to community severance caused by features of the street network, including:

- Motorised traffic volume and speed
- Quality and location of walking crossing points to meet desire lines
- Use of technology to optimise efficiency of movement (including walking and cycling movements) at signal controlled crossings
- Width and accessibility of pavement to suit numbers of people walking

Applying the Check on all schemes in the Healthy Streets Portfolio that are expected to have an effect on people walking and cycling will ensure that these causes of severance on the street network are identified and acknowledged at the design stage, providing an opportunity for the scheme to be changed accordingly and address this issue.

Recommendation 4

While on site carrying out standard and major roadworks, TfL and its contractors should check the TfL Road Network within 250m radius of where the main roadworks are taking place and resolve the following safety critical issues:

- **Side roads without dropped kerbs**
- **Major defects in the surface for walking**
- **Major defects in the surface for cycling**

Other high-risk road danger issues that can't be fixed on the spot should be identified and reported for action.

We would expect this to be cost-neutral, or save TfL money on remedial works.

Response

This recommendation raises some useful ideas, on which TfL would welcome further engagement with relevant parties.

Regarding the second and third points, TfL inspects the whole TLRN each month to identify defects on the carriageway, including facilities for walking and cycling. In addition, TfL will investigate when notified of defects or other maintenance issues along the TLRN. TfL only inspects its own network, which accounts for around five per cent of all London's streets, with boroughs inspecting and maintaining their own network.

Regarding the first point, it is agreed that the absence of dropped kerbs (or other facilities), which are not 'defects' but are design issues, can be significant barriers to people walking, especially for people with mobility impairments. The TLRN inspection regime identifies asset defects and records asset condition. TfL will review the feasibility of adapting this regime to include the identification of TLRN side roads without dropped kerbs. If this is demonstrated to be practical and affordable, then this information would provide a starting point for assessing the benefits and costs of addressing sites that do not have drop kerbs.

Recommendation 5

TfL should review its key performance indicators (KPIs) to ensure they align with the Mayor's Healthy Streets approach. For example, TfL might consider additional KPIs on:

- **Walking mode share**
- **Cycling mode share**
- **Car dependency**
- **Bus journey time reliability**

Response

The annual Travel in London report measures, analyses and interprets TfL's progress towards the objectives included in the MTS, including the aim to achieve 80 per cent of all journeys to be made walking, cycling or by using public transport. The measures used include the number of journeys taken by walking or cycling, bus reliability and physical activity levels.

TfL is developing its scorecard and KPIs for 2018-19 which will align with the Healthy Streets Approach and the outcomes set out in the MTS. The 2018-19 scorecard will be finalised in March 2018.

Recommendation 6

TfL should look beyond collisions data and consider the potential to increase walking and cycling when selecting junctions to improve.

Response

TfL recognises that reducing danger at junctions is key to making people feel safe on London's streets. A comfortable, attractive and safe cycling and walking route will not fulfil its potential if it is interrupted by an intimidating junction. TfL's Safer Junctions programme aims to address this fear by reducing danger at London's most high-risk junctions.

These junctions have been identified based on their historic casualty record. However, the Vision Zero approach means TfL is targeting infrastructure improvements where the perception of road danger, rather than solely the number of casualties, is highest. This means TfL will address junctions that are currently avoided by people walking and cycling due to their perception of road danger at that location. This new approach will be detailed in TfL's Vision Zero Action Plan, to be published later this year.

Although the Safer Junction programme primarily addresses road danger, the programme is part of the Healthy Streets Portfolio and as such it also aims to achieve all the Healthy Streets outcomes, including reducing car dominance and increasing walking and cycling.

As for all other TfL schemes that are expected to impact on people's experience of the street, the proposed designs for these junctions will be subject to the Healthy Streets Check for Designers. The Check has been developed to ensure TfL is following the Healthy Streets Approach and that its schemes deliver improvements on the ten Healthy Streets Indicators rather than focusing on a specific design element. Using the Check on Safer Junction schemes will ensure that improvements to the walking and cycling environments beyond road danger reduction are fully considered at the design stage.

In addition, TfL is undertaking innovative data analysis to inform its future investment in walking and cycling infrastructure. For example, the Strategic Cycling Analysis which it published in 2017 has enabled TfL to identify 25 corridors across London that have the greatest potential for increasing cycling. This new approach based on existing demand, cycling growth forecasts, population growth, and – crucially – safety data, is being used to help identify which locations should be prioritised, including dangerous junctions.

Recommendation 7

TfL should collect “before and after” data on pedestrian and cycle movements when it builds new schemes and carries out major works at junctions, and encourage boroughs to do the same. As well as counts at the junction itself, this should include an assessment of pedestrian and cycle movements on the neighbouring streets. TfL should then use this information to identify and spread examples of good practice

Response

TfL has developed its understanding of people's movements across London through various data collection methods and analysis.

The annual Travel in London report measures, analyses and interprets progress towards the MTS outcomes based on comprehensive datasets, including the London Travel Demand Survey (LTDS). The LTDS consists of interviewing 8,000 randomly selected households in London on a yearly basis. The survey is updated regularly to reflect TfL's priorities set out in the MTS and provides a detailed picture of travel by residents of the Capital.

In addition, TfL has a comprehensive cycling monitoring programme based on cycling counts and intercept surveys, and work is underway to better measure walking movements and the human experience of using a street. In February, TfL installed new cycle counters in certain locations that showed Londoners, for the first time, how many people are using the route. Walking counters at permanent locations are being set up and TfL is developing a Healthy Streets tracker survey based on the ten Healthy Streets Indicators. These two new monitoring features are in early stages of development but will be essential to tracking progress towards the delivery of the MTS.

TfL measures before and after data on walking and cycling movements where significant changes are expected and/or when increasing walking and cycling is the main objective of a scheme, such as Cycle Superhighways and Quietways. For example, TfL monitored the impacts of its schemes on the A406 at Bounds Green and Henlys Corner. Both schemes had an objective to enhance the environment for people walking, with the scheme at Bounds Green also aiming to increase the environment for people cycling. Post-project monitoring demonstrated that TfL's interventions enabled a reduction in the number of collisions and an increase in the number of people walking and cycling.

As described above, TfL undertakes walking and cycling monitoring on a scheme-by-scheme basis to analyse any impact schemes may have had and inform the development of future schemes. Work is ongoing to ensure that these scheme-based measurements are aligned with TfL's strategic monitoring programme, to gather as rich a data set as possible. TfL is introducing a process by which all major projects funded in TfL's Healthy Streets Portfolio follow a clear benefits management process through their lifecycle, involving consistent pre-and post-project measurement. Cycling measurements include cycle counts, analysis of safety records and intercept surveys to capture perception of safety. Walking measurements, including counts, are not as well established but work is underway to develop new consistent methodologies to monitor change.

TfL also encourages London boroughs to monitor changes in walking and cycling levels that result from schemes delivered within their Local Implementation Plans.

TfL is always looking to improve its understanding of people's travel behaviours and identify the best intervention levers that will help us deliver the MTS. One of the latest examples of continuous improvement in this area is the Strategic Cycling Analysis. The Strategic Cycling Analysis presents what the latest datasets, forecasts and models show about potential corridors and locations where current and future cycling demand could justify future investment. This innovative analysis was used to identify the six new cycling routes announced by the Mayor in January 2018. TfL hopes to use a similar approach to identify and prioritise investment in areas of high current and future pedestrian demand and more information will be available on this in TfL's Walking Plan, due to be published later this year.

Recommendation 8

TfL should publish information to show how much Healthy Streets funding it is spending on each borough. Information for 2017-18 should be available by the end of April, and we would expect annual data to be published thereafter as a matter of course.

Response

TfL will publish this information at the end of the financial year, and will do this each year in the future.

Recommendation 9

TfL should be proactive in asking for changes to the Highway Code and other relevant legislation that could help people walking and cycling in London. It should publish a list of statutory requests and meet regularly with the Department for Transport to discuss these requests.

Response

TfL maintains a regular dialogue with the Department for Transport (DfT) on safety matters and is discussing the need to change regulations to improve safety. For example, to allow better enforcement of mandatory cycle lanes and advanced stopping lines. In addition, TfL has spoken

with the DfT about the need to strengthen the Highway Code with respect to vulnerable road users. An updated list of asks from Government will be included in the Vision Zero Action Plan.

Recommendation 10

TfL should research and identify best practice from other countries. As an example, we recommend that TfL should consider further research on the changes set out in British Cycling's Turning the Corner campaign. Initially this would involve a traffic modelling study and then off-street trials. If this project were to go ahead, we would also recommend that TfL sets up an advisory group made up of key stakeholders such as the Department for Transport, Living Streets, the RAC Foundation and the Disabled Person's Transport Advisory Committee.

Response

National and international benchmarking is an essential part of strategy, policy and design guidance development at TfL.

TfL actively contributes to national knowledge transfer platforms such as the Cycle Cities Ambition Grant programme and the Cycle Proofing Working Group. Through these channels, TfL is able to identify and share best practice as well as advise the DfT on cycling related matters.

Ahead of publishing the London Cycling Design Standards (LCDS), TfL commissioned a study of selected international cities to better understand what makes for success in relation to cycle infrastructure, safety and culture. The study was tasked to focus on design approaches in cities with high levels of cycling and/or recent significant growth in cycling numbers. The findings of this study were published in December 2014 in the report *International Cycling Infrastructure Best Practice Study* and informed the development of the LCDS, which applies to all streets in London and which relevant funding programmes must meet.

In 2017 TfL hosted its first ever international walking conference, following the publication of Healthy Streets for London. Expert speakers from New York City and Paris shared their expertise and experience on the role high quality streets and public spaces can play in making cities more inclusive and liveable.

TfL is sharing its expertise internationally, notably through endorsing the Global Street Design Guidance from the National Association of City Transport Officials (March 2017) which established innovative principles for prioritising walking, public transport and cycling in street design. In 2016-17, TfL also contributed to the development of the EU Cycling Strategy as a member of the expert panel which developed the strategy.

In the UK, TfL is in regular dialogue with advocacy groups and other key stakeholders such as Sustrans, Living Streets, the DfT and London boroughs. The close relationship TfL has developed with these organisations is essential to ensure our strategies, policies, design guidance and schemes reflect best practice.

TfL is aware of British Cycling's report, which proposes ways of addressing collision risk at junctions for people cycling or walking. It draws from the experience of other European countries with high cycle mode share and recommends that the Government act to bring UK legislation and practice more in line with those countries. There are four proposals in British Cycling's report:

1. Updating the Highway Code to strengthen statements on vehicles giving way to people walking and cycling when turning.

2. Redefining an existing road marking for continuation of a cycle facility across a side road to indicate specific requirement for vehicles to give way to cycle traffic when turning.
3. Creating a general legal obligation for vehicles to give way to people walking and cycling when turning at priority junctions.
4. Creating a similar legal obligation at signal-controlled junctions

TfL is supportive in principle of the first and third proposal, which combined would remove the need for the second proposal.

The Hostile Streets report focuses on the fourth proposal. Such a change in traffic regulation would need to be applied universally to all junctions with signals, including outside London, to ensure street users understand and comply with the rules. If only applied to some junctions in isolation, street users may become confused about who has the right of way. The proposal is therefore for a national policy change, best led by central Government

As highlighted in the Hostile Streets report, the initial traffic modeling of the proposal, undertaken by Phil Jones Associates (PJA) showed that it has the potential to free junction capacity.

TfL has worked with PJA to evaluate the traffic model. The traffic modelling was based at a junction with a large footprint, where the geometry incorporated a lane dedicated to 'ahead traffic', stopping space to enable right turning vehicles to give way at pedestrian crossings, and low pedestrian flows. While these conditions could be met at some junctions in outer London, it is not the case for the majority of London's junctions that have signals. This means that the efficiency gains promoted in the British Cycling report would only be delivered at a limited number of locations.

The model also assumes safe behaviours from all road users, but TfL was concerned that the behaviour of right-turning drivers coping with two stages of potential conflict (i.e. on-coming traffic and then pedestrians), is not well understood.

Significant investigation would be required to assess the potential safety and network impacts of the fourth proposal set out in British Cycling's report and our current priority is to focus attention on delivering the changes enabled by the Healthy Streets investment portfolio.

As such, while TfL would be interested in working alongside other stakeholders to develop a better understanding of both the impact of the proposals on all street users, and what regulatory and infrastructure changes would be required before implementation, we are not currently in a position to resource leading work on this national policy change

Next steps

TfL is committed to unlocking the considerable potential for increasing walking and cycling in outer London. The MTS aims for 80 per cent of all journeys to be made by walking, cycling and on public transport by 2041. A wide range of interventions is required to achieve this target, and the Mayor and TfL has set out the strategic approach to delivering these with the publication of the final MTS and Local Implementation Plan Guidance.

TfL has adopted the Healthy Streets Approach which provides an overarching framework for our policy development, strategy and delivery. Putting this approach into practice is essential to success in achieving the MTS' mode share targets. TfL's processes are being updated to reflect the Healthy Streets Approach and TfL is supporting London boroughs in adopting the same approach.

TfL will publish a series of strategies and action plans in the coming months to further detail how the MTS will be delivered. This includes the Vision Zero Action Plan, in addition to more details on walking and cycling proposals.