

London Cycling Campaign

30 September 2016

Westminster Draft Walking Strategy

<http://committees.westminster.gov.uk/mqIssueHistoryHome.aspx?Ild=7983&Opt=0>

This consultation response is on behalf of the London Cycling Campaign, the capital's leading cycling organisation with more than 12,000 members and 40,000 supporters. The LCC welcomes the opportunity to comment on plans. Its response was developed with input from the co-chairs of LCC's Infrastructure Review Group and in support of the response from the Westminster Cycling Campaign, the borough group.

LCC requires schemes to be designed to accommodate growth in cycling and walking. Providing space for cycling and walking are more efficient uses of space than providing space for driving private motor vehicles, particularly for journeys of 5km or less.

LCC has the following general points to make on the draft Walking Strategy:

- Overall, this document represents a failure in seriously prioritising walking and/or cycling as sustainable and active transport modes over private motor car usage. LCC would urge Westminster to be far bolder in the formulation of such strategy and policies, and to put forward more challenging targets and specific example schemes to tackle this issue. Many of the proposals in the document are welcome – but what is missing is telling – traffic restriction, pedestrian/cycling zones or cells and/or routes, policy on junctions, crossings and pavement widths, parking reduction etc.
- The strategy currently fails to mention or take into account the rising importance of TfL's "Healthy Streets" strategy and methodology.
- The document prioritises behaviour change through promotion and marketing over infrastructure change. All of the evidence is that people avoid walking and cycling in hostile, polluted etc. environments. So Westminster must pursue a policy of changing infrastructure on streets to provide safer, comfortable and enjoyable space for walking and cycling if it is serious about improving walking and cycling rates – and that means reducing the priority given to private motor vehicle usage in schemes put forward. There is little evidence that behaviour change is easily achievable through marketing and promotion alone.

LCC has the following specific points to make on the draft Walking Strategy:

- **20mph**
"The challenge is to find ways to achieve reductions in vehicle speeds in signed-only 20mph limits, so that safety benefits are realised, traffic can move at a steady pace so that air quality is not worsened. Enforcement is only a partial solution and behaviour change is required so that drivers view 20mph as the appropriate speed in urban areas. There are, therefore, opportunities to learn from the implementation of 20mph zones and speed limits from our neighbouring and other London boroughs in order to identify how they could be applied within Westminster. SDG recommended that the Council should keep this under review and consider the potential for a pilot 20mph zone that should be carefully monitored

and the impacts analysed.” Cabinet Member Report 18 May 2016.

“The evidence is clear that reducing vehicle speeds results in fewer and less severe collisions, particularly for vulnerable road users. Historically, 20mph zones have been particularly successful at reducing speeds by using physical traffic calming measures. Limited resources and relaxed regulations mean that signed-only 20mph limits are now preferred; however, these tend to achieve smaller decreases in vehicle speeds and can add to street clutter. The challenge is to find ways to achieve reductions in vehicle speeds in signed-only 20mph limits, so that safety benefits are still realised, traffic can move at a steady pace and air quality is not worsened.” 20mph speed limits.

Given the “evidence is clear”, then Westminster’s decision to merely possibly trial 20mph in one location (*“The Council should... consider the potential for a pilot 20mph zone” 4.29 Making walking safer*), is truly shocking. LCC calls on Westminster council to immediately implement 20mph across the entire borough – as a matter of urgency. This is the likely single biggest thing the council can do to improve road safety. As it implements 20mph rollout, specific measures to ensure compliance can be developed, and even trialled, and learnings from other boroughs applied (physical measures, camera enforcement and other approaches are being used in other boroughs). There is no fundamental reason that just because “signed-only 20mph limits are now preferred” that that is the only acceptable approach. Westminster should immediately identify methods to control speed and implement them in a rapidly rolled-out borough-wide manner.

- **“Busy roads”**

“Those walking along less-trafficked routes were found to have significantly lowered their exposure to airborne pollutants compared to those using routes with higher levels of traffic.” Improving local air quality 3.28.

This statement is used to justify signing pedestrians away from “busy roads”. Westminster should use these findings as justification, instead, to reduce traffic capacity, introduce car-free areas and ensure schemes achieve “modal shift” out of private motor vehicles to more sustainable modes.

In some cases, the proposed routings of pedestrians sends them onto other busy roads.

- **Marketing and promotion for behaviour change**

“In Town Without My Car (car free day) is held in September every year and is part of an approach aimed at reclaiming cities, raising the awareness of the effects of private cars, and sharing streets with other users.” p27.

This demonstrates Westminster Council’s policy of marketing and promotion as the council’s primary lever for behaviour change – rather than infrastructure (see also WalkFit, Play Streets etc.). Car Free Day is a single annual event – it is very unlikely to result in significant long-term behaviour change in the area.

- **“Forgiving” environments**

The same issue (promotion/marketing over infrastructure) is applicable also to “Child Pedestrian Training”. The stated “aim of the scheme is to equip children at the kerbside with the necessary skills and knowledge that they will need to enable them to use roads safely.” Dutch and other European approaches to Highways would be the other way round – to change the environment to make it safe for all, rather than expect small children to have to learn how to behave (which is unlikely to be reliable) because the environment is so difficult to negotiate. The Dutch “Sustainable Safety” approach would be to design an environment

“forgiving” of the kind of mistakes one might expect children to make – not to expect children to be 100% reliable in their road skills.

- **No- or low-car environments**

Crossrail works have demonstrated that Soho businesses can more than just survive despite significant restrictions on motor vehicle access. At the end of works, the entire area should either be made walking/cycling only (with suitable delivery arrangements), or all through routes should be modally filtered to remove cut-through traffic. These approaches – either full pedestrianisation, or “modal filter cell” removal of through routes – could and should be applied to many other areas of Westminster – primarily those characterised by narrow streets, small retail and/or residential and very high pedestrian footfall – but Westminster’s grand squares would also benefit from such treatments too.

The latter approach would, for instance, not restrict deliveries or taxi pick-up/dropoff at key locations, but would make journeys by car cutting directly through an area impossible. With the former, it’s vital to understand that “full pedestrianisation” where cycling is excluded, or rendered impossible by design, can sever routes for people cycling almost as badly as busy roads without cycling infrastructure. Therefore, cycling/walking areas should be designed to accommodate both modes – and with both in mind. And LCC will resist any pedestrian-only zones which run along or across key cycling desire lines unless suitable and high-quality alternatives are included in the scheme.

- **Car parking**

“Despite almost two thirds of households in Westminster being car free, the tendency within Westminster has been to protect residential car parking and to ensure that sufficient car parking is provided for residents with all new developments. More restrictive car parking approaches are the norm in other central London boroughs, and can be helpful in reducing car travel and encouraging greater use of other modes.” 3.67 Challenges Residential Parking.

Westminster should be restricting, reducing or removing car parking far more than it currently does. If the borough is serious about providing space for cycling and/or walking, or about modal shift from private vehicle use to more sustainable modes, the likely key to this is car parking. Cars across the UK are on average parked 96% of the time

(<http://www.racfoundation.org/research/mobility/spaced-out-perspectives-on-parking>).

This takes up a huge amount of public space that could be used for other purposes. There is also plentiful evidence that residents, businesses and others can positively adapt to the reduction of car parking (businesses also routinely hugely overestimate the importance to trade and business of parking and loading access). If Westminster started on a process of reducing car parking etc. it would dramatically and positively be able to rebalance road priorities and roadspace for walking and cycling.

- **Pedestrian and cycling priority in schemes**

“There are, however, different ways in which the concept can be applied so that the better accommodation of pedestrians does not have a significant adverse impact on other road users.” 4.6 Allocation of highway space.

Oslo is moving to ban all cars and car parking within a 6-7km radius around the city centre in the next few years (Oslo has a population of over 600,000). There is no reason why Westminster could not dramatically reduce parking, car usage and access to much of the borough. This approach would likely result in huge modal shift to walking, cycling and other sustainable transport modes, hugely improved air quality and improved business vitality too

etc. Without Westminster beginning to tackle car dominance on its streets, there can be no significant improvements for cycling and/or walking.

The argument is that even radical rebalancing of the Highway away from private motor vehicles and towards cycling and walking would not be “adverse” to residents or visitors – it would encourage modal shift. There will be those resistant to such changes, who claim that unconstrained car usage is vital. But in a city with a hugely growing population, clearly identified major issues with pollution, inactivity and climate change, and with constrained road capacity, the only choices Westminster Council has are to continue with a policy of fairly unconstrained car usage and ownership, or change those more rapidly and radically than this document envisages.

- **Positive progress**

The LCC recognises the positive elements of Westminster Council’s ongoing policies and procedures, as well as those reinforced in this document, including: increasing car parking restrictions near junctions and crossings; implementing green man pedestrian phases at signalised junctions; and improving pedestrian crossings in general.