

The Strategic Transportation Team  
City of London Corporation  
Guildhall  
London  
EC2P 2EJ

By email: [strategic.transportation@cityoflondon.gov.uk](mailto:strategic.transportation@cityoflondon.gov.uk)

11 January 2019

Dear Sir/Madam,

**Re: City of London Corporation's Draft Transport Strategy**

I am writing on behalf of the City Property Association (CPA), the membership body for the owners, investors, professional advisors and developers of real estate in the City of London. I attach a list of the 160 member companies we represent.

*As well as our representations outlined below, we endorse the consultation response submitted by CPA NextGen Steering Group: the younger generation property industry professionals (also dated 11 January 2019).*

The CPA welcomes the opportunity to comment on the draft City of London Corporation Transport Strategy dated November 2018.

**General comments**

Given that the City of London's workforce is expected to grow by 90,000 over the next decade, it is right that a key priority of the City Corporation is to ensure that sufficient space is available to accommodate additional people moving around Square Mile. As 90% of on-street journeys originating or finishing within the City are entirely or partially walked, we welcome the focus on improving the pedestrian experience for people who work, visit and live in the area.

With this in mind, the CPA supports the overall transport vision that the City Corporation is putting forward. We feel confident that the scope of the proposals set out in the draft document will deliver the vision of "*streets that inspire and delight, provide world-class connections and a Square Mile that is accessible to all.*"

It is positive that this is a 25 year framework, which is a long enough timescale to put into effect significant strategic change, but not so far forward looking in its scope to be beyond the reaches of what is a very fast evolving transport sector in terms of user expectations and technology.

We note that the Delivery Strategy will be further detailed in a number of plans, including a Transport Strategy Delivery Plan and Healthy Streets Plan. The ambitions behind the Transport Strategy will only be fully achieved through cultural and behavioural changes amongst people and businesses. The norms of the City will need to change if we are to deliver the City Corporation's target reductions in

private car usage and improvements in sustainable travel (for example proposal 11 – a 25% reduction in motor traffic by 2030).

The fundamental transport vision set out by the draft Transport Strategy is built around three main ideas:

1. Continued removal of non-essential traffic
2. Improving air quality within the Square Mile, and
3. Achieving Vision Zero road safety targets

These key objectives and themes should run throughout the implementation of the Strategy, and the associated delivery plans.

The Transport Strategy is a detailed, comprehensive document with a total of 51 intervention proposals (proposals 52-54 relate to the delivery of the draft Transport Strategy). Whilst the ambition of the Strategy is strongly supported by the CPA, there is a risk that the sheer number of proposals mean that key projects become diluted in the future or do not come to fruition. It would be beneficial to provide greater clarity on the relative importance of proposals in relation to one another. This could be accomplished through a streamlined prioritisation of the proposals and deliverables within the draft Transport Strategy.

In addition, the delivery and planned programme for the key Transport Strategy projects should be moved towards the beginning the draft Transport Strategy to provide greater perspective of timescales to the reader.

### **Detailed comments**

Below we have provided further detailed comments on the specific proposals.

#### **Proposal 1: Embed the healthy streets approach in transport planning and delivery**

The theme of forming a strong alliance with TfL's Healthy Streets approach is welcomed.

It would be helpful to provide some direction towards guidance and best practise for what will need to be undertaken for a Healthy Streets assessment (even if this is directing towards the TfL guidance). It should be clarified that not all planning applications will need to be assessed against Healthy Streets Indicators.

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

This proposal rightly draws upon feedback to the City Corporation's early consultation, by looking to promote walking as the preferred mode of transport and incorporating pedestrian requirements into development design. By 2044, it is aimed that half of all streets (equating to a length of approximately 55km) will be 'pedestrian priority'. It is right that the City Corporation recognises that giving priority to people walking may result in delays or reduced capacity for other street users.

We are unclear whether the ambition for 25km, 35km and 55km of pedestrian priority streets is based on highways analysis or ambition. This should be clarified and relevant evidence referred to.

An aspiration to obtain a minimum Pedestrian Comfort Level of B+ is understood. However, given the significant growth in pedestrian numbers (for example within the Eastern City Cluster<sup>1</sup>) this may not always be achievable, particularly having regard to the City of London's medieval street pattern.

Therefore, it is suggested the PCL level of B+ be an 'aspirational minimum' with its appropriateness developed on a case-by-case basis, as opposed to a strict requirement for all future developments, some of which will not be able to achieve this level.

**Proposal 3: Complete the riverside walkway and improve walking connections between the riverside and the rest of the City**

The precursor text to proposal 3 mentions positive measures such as:

- Identifying opportunities to introduce pedestrian priority to streets with a pavement width of less than 2 metres
- Introducing a protocol that Pedestrian Priority Streets being access only for motor vehicles and all vehicles expected to give way to people walking, and
- Decisions about cycle access to pedestrianised streets being decided on a case-by-case basis to ensure that people walking and cycling feel safe and comfortable

We strongly support these measures but do not believe that widening pedestrian crossings to achieve minimum pedestrian comfort levels should feature as a key driver. Crossings are rarely used as confined spaces (like pavements or corridors) where pedestrian comfort levels are more appropriate. The width of pedestrian crossings is often defined as being the width between the dashed markings, but that rarely defines the width which pedestrians use to cross the road - making a definition of a pedestrian crossing width of limited benefit.

**Proposal 5: Ensure new developments contribute to improving the experience of walking and spending time on the City's Streets**

This proposal demonstrates significant opportunities to promote improved public realm and suitable space for pedestrians as a requirement for new property developments. This would encourage sustainable transport modes, by providing suitable and enjoyable walking routes incorporated into scheme designs.

The degree to which this requirement is applied to new developments should be assessed flexibly, and on an individual case-by-case basis. Opportunities may be limited on developments where space is restricted and ground plane uses could be expected to address multiple policy objectives.

**Proposal 11: Take a proactive approach to reducing motor traffic**

The ambition behind the target to achieve a 25% reduction in motor traffic by 2030 is strongly supported. It would enable the reallocation of the City of London's street space from motor vehicles to individuals who are walking and cycling.

---

<sup>1</sup> <http://easternclusterarea.london/>

There is an expectation that motorised vehicles travelling through London will increasingly become electric, and therefore zero carbon, up to 2030. Future reductions in traffic would be expected beyond this date, when use of any private vehicles within the City of London are gradually phased out. This should be reflected in the City Corporation's 25 year Strategy.

It is also important to remove non-essential freight traffic from the City of London's streets, as half of this traffic has no origin or destination in the City and overall freight traffic is about 25% of all vehicle traffic in the City.

We believe that the key driver in reducing traffic volumes in the City of London is a revised congestion charging system that charges users relative to distance travelled, disincentivises vehicles from using certain streets at certain times and takes account of vehicle emissions (and potentially occupancy levels as well). The draft Transport Strategy mentions that the City Corporation will explore the feasibility of developing an appropriate charging mechanism for the City of London, should there be no clear commitment in the next Mayor's election manifesto. We believe that the City Corporation should be a front-runner in establishing such a system, potentially ahead of TfL's programme.

**Proposal 13: Use timed and temporary street closures to help make streets safer and more attractive places to walk, cycle and spend time**

The CPA broadly supports this proposal, however regard should be given for existing occupiers and the challenges this would impose on them. Control over deliveries can be effective when set out from first occupation as part of tenancy agreements, but where existing agreements are in place, there can be significant difficulty in encouraging tenants to change their operations.

As set out in the CPA response to the Eastern Cluster Area Strategy in August 2018, we have concerns about timed road closures and the reliance of existing tenants and occupiers on long-standing arrangements reliant upon access throughout the day, including courier deliveries.

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

The CPA agrees that the increasingly scarce amount of kerb space available across the Square Mile could be more efficiently used. We are concerned, however, about an approach of reducing dwell times in loading bays, as it could create additional challenges for delivery vehicles with consolidated loads for multiple buildings that may not have off-street delivery facilities.

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

This proposal warrants a particularly positive response. The CPA commends the City Corporation for this featuring it as a prominent aspect of the draft Transport Strategy.

The proposal for a blanket 15mph speed limit is also welcomed. The required enforcement measures required for this new speed limit should be considered in future street designs.

**Proposal 21: Work with the City of London Police to reduce crime and fear of crime**

The CPA supports plans to work collaboratively with the City of London Police in order to combat crime and improve the sense of place and safety for those on the City streets, and we would encourage closer engagement with the CPA and other business groups on relevant issues, particularly items which arise from the proposed City Corporation and City Police quarterly meetings and other relevant forums.

**Proposal 24: Apply a minimum cycling level of service**

This proposal looks to achieve a minimum cycling level of service on all City Streets by 2044 either through provision of protected 1.5m-wide cycle lanes or by limiting motor traffic vehicles to less than 150 vehicles per hour. To allow for successful implementation, the objectives for this proposal should align with the new TfL Healthy Streets Transport Assessment Guidance.

**Proposal 29: Support and champion a central London Zero Emissions Zone & Proposal 30: Install additional electric vehicle charging infrastructure**

Compelling points are raised in the precursor text to proposals 29 and 30, but it is important to recognise that electric cars contribute towards traffic congestion. The promotion of electric vehicle charging infrastructure promotes the continued use of cars that are relatively large vehicular transport (when compared to say, a bicycle) with traditionally low occupancy.

Electric vehicles are likely to grow in popularity over the next 10 years, and congestion is likely to replace air quality as a key public concern. Transport safety issues and competition with bicycles on the streets are not addressed by promoting electric vehicles.

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

The general principles and objectives of consolidation are welcomed, subject to the views previously provided by the CPA to the Freight and Delivery Supplementary Planning Document consultation.

The flexibility of using 'Virtual Consolidation' strategies (i.e. consolidated procurement strategies and reducing the numbers of delivery vehicles through other means) should be highlighted as a key part of delivering proposal 38. We note that 'virtual consolidation' is detailed and set out in the supporting text to policy VT2 in the draft City of London Corporation Local Plan.

The proposal for the City Corporation to work with a partner haulier to provide a consolidation service is very much a positive step and is welcomed. The City has an ability to coordinate a large number of City tenants and landlords and is well placed to achieve the economies of scale needed to make consolidation strategies successful.

The CPA understands that there is surplus space at Walbrook Wharf which is not currently used for waste processing. We believe there is the potential for Walbrook Wharf to work as a micro-consolidation centre where bulk deliveries via the River Thames could be processed for onward final delivery by bicycle, electric assisted bicycles, cargo bikes and electric vans. It would be good to see commitment to further explore this potential.

#### **Proposal 44: Establish a future Transport Advisory Board**

The CPA strongly supports the objectives of this proposal and would welcome the opportunity to become a Future Transport Advisory Board member.

#### **Proposal 49: Review bus provision across the City**

The stance set out in the draft Transport Strategy is generally supported here, but it is important that the review results in a reduction and rationalisation of the number of bus services in the City of London.

#### **Summary**

The CPA strongly welcomes the vision of the City of London Corporation's Transport Strategy. We agree that focusing on improving the pedestrian and cyclist experience of travelling through the Square Mile will help ensure the City of London remains a modern, dynamic and attractive global business destination. The Strategy sets out workable solutions to tackle air quality, congestion and transport safety challenges in Central London and we hope that other boroughs will follow suit.

To ensure that key projects set out in the Strategy do not become diluted, we encourage the City Corporation to provide greater clarity on the relative importance of proposals in relation to one another.

We would also encourage:

- Guidance and best practise being issued on the Healthy Streets assessment
- The Pedestrian Comfort Level of B+ being set as a 'aspirational minimum' with its appropriateness developed on a case-by-case basis
- The widening of pedestrian crossings to *not* be considered a key driver in achieving minimum pedestrian comfort levels
- A requirement for new developments to contribute to improving the experience of walking and spending time on the City's Streets being assessed flexibly, and on an individual case-by-case basis
- The City Corporation exploring being a front-runner in introducing a revised congestion charging system
- Regard being given for the challenges from introducing timed and temporary street closures on existing occupiers e.g. long-standing arrangements for timed deliveries
- Revising the plan to reduce dwell times in loading bays, as it may undermine the benefits being achieved by multiple occupiers using grouped deliveries (and generally, we would support more being done by the City Corporation to support 'virtual consolidation')
- Consider less encouragement / promotion of electric vehicles in the Square Mile, because of their traffic congestion impacts

The Strategy document recognises that the City Corporation cannot deliver the Strategy on its own and sets out the intention to work with a range of partners including property developers and the construction industry. The CPA would very much like to be part of this important partnership.

Finally, I would like to thank the City Corporation's Transport team for the high quality of the consultation process and for providing multiple opportunities for our Board and wider membership to engage with the vision and detailed proposals included in this Strategy. We note that Transport officers have taken time to meet separately with the CPA's Transport advisor, our Major Occupiers' Group and members of our NextGen Steering Committee, as well as presenting to CPA members at a breakfast policy seminar.

We look forward to the further development and adoption of the Transport Strategy, and would welcome the opportunity to remain engaged with the evolution of its key policies and proposals.

Yours sincerely,



**David Ainsworth**  
CPA President