

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

05 January 2023

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

Dear Sir/Madam,

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

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. Our list of 150+ member companies we represent can be found online [here](#).

CPA welcomes the opportunity to comment on the proposed changes to the City of London Corporation Transport Strategy under the current review. Since the Strategy was first published in 2019 there has been a significant shift in travel and work patterns creating new opportunities to reimagine, modernise and revitalise key parts of the City.

The appeal of the City as a destination and an attractive place to visit is fundamental to its ongoing success and is at the heart of 'Destination City'. As we set out in our [Visualising Destination City](#) report in October 2023, transformative public realm has a key role to play in delivering the City Corporation's Destination City ambitions. We specifically wish to draw your attention to the map contained in our Vision document as we believe it shows the opportunity to be even more ambitious in transforming the City.

By activating the City's streets and public spaces and ensuring they are attractive, welcoming and pleasurable places to dwell and travel, the City will be able to fully realise its vision of becoming a thriving cultural, commercial and leisure hub. On this, the City of London Corporation has the CPA's emphatic support.

Given that the City of London's workforce is expected to grow by 85,000 by 2040 according to estimates based on GLA data and office attendance may also continue to 'move upwards' (*City of London Corporation Future of Office Use* report, Knight Frank & Arup), it is right that ensuring there is sufficient space available to accommodate additional people moving around the Square Mile remains a key priority of the Strategy. As 90% of on-street journeys originating or finishing within the City are entirely or partially walked, we welcome the continued focus on improving the pedestrian experience for people who work, visit and live in the area.

With this in mind, the CPA remains supportive of the overall transport vision that the City Corporation published in 2019 and its recent proposed changes. We do wish to stress the need to deliver at pace though, and to be ambitious and forward looking in taking a strategic view to transform how we all use the City so the proposals set out deliver, as you state in your consultation, *"streets that inspire and delight, provide world-class connections and a Square Mile that is inclusive and accessible to all."*

Our detailed comments continue overleaf.

## Specific comments

### **A more inclusive and accessible City**

We are delighted to see that inclusivity will be core to the City's vision – and that this means priority will be given to projects that will make the City's streets more inclusive (proposal 1b). Across London 1 in 8 people have a disability (Trust for London), and many other people cannot move around where they wish because of the lack of safe and accessible walking, wheeling and cycling routes, or supportive infrastructure such as clean public toilets.

With this in mind we welcome the creation of accessible walking and wheeling routes across the City (proposal 2), pedestrian priority streets, upgrades to crossing points and connections to the riverside walking route (proposal 3). We also support app-based solutions that would allow disabled passengers to use taxis in instances where such use would be restricted to other users (proposal 43).

We also welcome the aim to prioritise buses (proposal 49), and expect this will improve journey reliability for their users.

Overall, we welcome the introduction of an overarching outcome for the Square Mile to be accessible to all (outcome 3) and support a comprehensive and evidence-based accessibility audit of City Streets to deploy accessibility improvements (proposal 16).

### **New and enhanced public realm**

For reasons stated above, we are enthusiastic about proposal 7 to provide more public space in the City. Traffic reductions seen over the last few years provide the ideal opportunity to free up and reallocate space once used for car parking and traffic to create new and vibrant public spaces. CPA would like to see the City Corporation go further, including pedestrianising streets with low traffic volumes where appropriate – making them more accessible for those walking and wheeling, as well as providing greater opportunities for a wide range of leisure uses, such as alfresco dining. This will help the City Corporation achieve its Destination City vision.

To this end we strongly welcome suggestions to explore restrictions on vehicular traffic, including taxis, on a case by case basis. We urge the continuation of these restrictions at Bank Junction which has only very recently seen the completion of its long planned public realm works. Whilst we understand a very small number of people feel this is inconvenient, we would urge the City to take into consideration wider views and give the newly delivered scheme more time to bed in. Whilst it is not as ambitious as we would have liked to have seen delivered, it is still transformative for the area and rowing back now the junction is operational would be a retrograde step after 6+ years of the current restrictions.

People value working, visiting and living in the City for its public amenities, and additional public space will be needed to respond to the City's planned growth and Destination City ambitions. Where funding isn't readily available for a long term transformation of the City's streets. CPA fully supports the creation of new public spaces through temporary means to highlight the benefits that could be achieved if a long-term scheme were implemented.

In the last few years we have experienced several episodes of extreme heat on the City's streets, including advice to work remotely as a result. We welcome proposals to enhance existing walking and wheeling routes by the creation of "shaded cool routes" (Proposal 8). We would propose that the ambition to plant 100 trees by 2025 is augmented to a comprehensive greening programme across streets that suffer the worst exposure to heat. We also support the ambition to retrofit streets to provide sustainable drainage systems to deal with now more frequent heavy rainfall events (proposal 9).

### **Safety on the City's streets**

We strongly support the City's renewed commitment to reaching zero transport-related deaths and serious injuries on the City's roads (Vision Zero). We note that progress against the City's targets has been slower than anticipated but we see the increase in active travel, and car traffic reduction since the pandemic as an encouraging trend. Reaching Vision Zero as soon as possible is core to making walking, wheeling and cycling more inclusive – and with this in mind we very much welcome proposal 20 to apply the safe system approach and the principles of road danger reduction. Designing streets so they encourage lower speeds and stepping up the enforcement of speeding will be core to delivering on this proposal. We also welcome the new CityMark for construction logistics, which will continue to raise the bar on road safety for larger vehicles.

### **Micromobility**

We welcome the City's aim to improve the experience of riding cycles and scooters (Outcome 5). It is good to see that all routes will meet a minimum level of service for cycling and that key intersections will be enhanced with the experience of micromobility users in mind (proposal 24). We note that the density of parking bays is key to increasing the convenience of dockless micromobility schemes, and with that in mind we support the reallocation of car and motorcycle parking to micromobility parking (Proposal 14).

### **Deliveries and servicing**

Freight and servicing networks are complex and we support the City's pragmatic approach to reducing the number of freight vehicles within the Square Mile. We are confident that working with other London boroughs, BIDs, occupiers, Network Rail, TfL and logistics providers will see more goods and services delivered by cargo bikes, rail and River (proposal 38). We welcome innovative incentives for logistics providers to switch to sustainable and lighter modes – such as smart dynamic kerb space management that gives priority to cargo bike deliveries or small-scale mobile distribution hubs.

### **Technology**

Over the coming years we anticipate that 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. CPA would like to see this reflected 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.

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 updated vision and changes included in this Strategy.

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

Yours faithfully,



**Charles Begley / Chief Executive**  
**City Property Association**