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16th October 2017

Dear Sadiq,

Re: Islington's response to the Draft Mayor's Transport Strategy

Thank you for the opportunity to respond to the public consultation on your draft Mayor's Transport Strategy. As Islington's Executive Member for Environment and Transport, I am writing to you to provide Islington Council's formal response to the draft strategy.

Islington Council warmly welcomes the draft Mayor's Transport Strategy, which we feel sets out a very positive vision for improving and reshaping transport in London. The strategy contains very ambitious policies and proposals that are closely aligned with Islington Council's existing transport policies and aspirations, so we look forward to working with you to realise the objectives of the strategy over the coming years.

We are particularly pleased to see the transformation of Archway feature on the cover of the draft strategy. Archway exemplifies how dangerous roads and busy traffic locations can be transformed to create welcoming and safer places for pedestrians and cyclists. The removal of an Archway road in favour of creating a new public space for residents and visitors alike to enjoy whether through walking, cycling or public transport sends a powerful message about the kind of transformation that could be delivered throughout London.

We also welcome the draft strategy's policies and proposals relating to the new Healthy Streets approach, providing new emphasis on creating more space for walking; 'Vision Zero' for eliminating road traffic casualties by 2041; reducing air pollution and making London a zero carbon city by 2050; and improving rail and bus services alongside a fares freeze up to 2020. Building on these strengths, we would strongly recommend enhancements to the Mayor's Transport Strategy to include:

- A greater emphasis on replicating major transformation schemes like Archway across London, enabling more space for walking and cycling alongside improved public transport links
- Implementing and/or encouraging a default 20mph speed limit on all roads across London
- A commitment to make London diesel-free by 2025

- A commitment to work with London boroughs to replicate the success of ‘Bunhill Heat and Power’, capturing waste heat from London’s Underground to provide low-carbon domestic heating, saving Londoners at least 10% on their annual energy bills
- A commitment to gain further air quality benefits by encouraging the electrification of all rail lines in London, learning the lessons associated with the electrification of the Gospel Oak to Barking line
- Consider the opportunities offered by disused stations, by bringing some back into public use to contribute to necessary improvements in capacity and network enhancements
- A commitment that major transport improvement projects will take advantage of best practice construction techniques to reduce the local impact of projects like Crossrail 2, including measures to reduce noise and vibrations from construction and the transportation of construction waste and rubble out of London via rail rather than lorry
- A clear acknowledgement that much of the strategy will be delivered by London boroughs; so therefore the funding required will be greater than in recent years, and funds must be distributed fairly amongst boroughs based on actual need

Each of the strategy’s chapters is explored in more detail below, and key policies and proposals are discussed in more detail in the attached technical note.

Improving streets and public spaces; ‘Healthy Streets

Islington Council has long been committed to the principles behind the proposed new ‘Healthy Streets’ approach to streetscape design, so we warmly welcome this new focus on improving streets for people whether they are walking, cycling or travelling by public transport. We have taken on major transport challenges, working closely with Transport for London to transform **Archway Gyrotory**, removing the outdated 1960s traffic-dominated, one-way road system by replacing it with new cycle lanes, better pedestrian crossings and a brand new public space. We are committed to working together with you, Transport for London and local communities to deliver similar transformations at **Old Street Roundabout**, **Highbury Corner Roundabout** and on the **Kings Cross Gyrotory** over the next few years. In addition, we continue to re-design many local streets and neighbourhoods throughout Islington, and are currently asking Londoners for their views on our ambitious proposals to promote walking and a more enjoyable pedestrian experience by **transforming historic Clerkenwell Green** from a car park into a welcoming public place.

We believe that traffic speeds and volumes can be reduced through a ‘cellular’ system in some neighbourhoods, permitting local vehicle access but preventing unnecessary through traffic. We believe this approach could form a central part of a traffic reduction strategy for Islington, and would welcome the opportunity to further develop this concept.

We fully support your ambition to improve the quality of **public realm around rail and bus stations**, which in Islington is already in part being delivered as a result of major gyrotory removal transformations around stations such as Old Street, Highbury & Islington and Archway, and also at Farringdon. However, there is a need for further work around **Finsbury Park Station**, and at the **disused station entrances at Angel** (City Road / Torrens St) and at **Highbury & Islington**. We look forward to working with TfL to improve these station environments.

Improving road safety; ‘Vision Zero’

Islington was the first borough to pioneer a **blanket 20mph speed limit** on its own roads and has a long-standing commitment to road safety and casualty reduction, making roads safer for pedestrians, cyclists and all road users. We strongly support the strategy’s ‘Vision Zero’ aim, but believe the strategy

will fall short of this vision unless a blanket London-wide 20mph speed limit is implemented covering all borough roads and the Transport for London Road Network (TLRN), with very few exceptions. A number of other boroughs have followed Islington's lead in adopting a 20mph speed limit, but a Mayoral policy that sets timescales to roll out the 20mph speed limit across all of London may be required to fully eliminate injuries and fatalities on London's roads.

A key barrier that Islington overcame in making the introduction of its 20mph speed limit a success was obtaining the co-operation of Islington Police to enforce the 20mph speed limit. If this strategy insists that 20mph will be the norm and must be enforced by the Police, traffic speeds will reduce throughout London, creating a road culture that will be much more conducive to walking and cycling. We ask that you therefore take the lead in reducing the default speed limit on London's streets from 30mph to 20mph, including on all but the biggest TLRN roads, as part of this strategy. TfL are in fact currently trialling 20mph speed limits on a number of TLRN routes, and the strategy would benefit from some mention of this initiative.

Islington Council is committed to playing its part in achieving the strategy's very ambitious 'Vision Zero' aim. Islington has a long track record of engaging with the public, and engagement will be an important component in building public support for the road safety measures and policies that will be required to transform London's streets for everyone's benefit.

Many road dangers can be eliminated with relatively minimal cost through measures such as greater **education of all road users, reducing drink-driving and drug-driving, more demanding tests** before a driver is given a licence, **stricter enforcement of road rules**, and **stricter road rules** themselves. However, reducing and eliminating fatalities and serious injuries across London by 2041 will require increased resources for TfL and the boroughs seeking to design out road dangers at key junctions and streets.

Islington Council is committed to reducing the number of people injured or killed on London's streets, regardless of the form of travel they have chosen. This includes **motorcycles and scooters**. Bus lanes on roads managed by Islington Council currently are not permitted to be used by those riding motorcycles and scooters. If the final Mayor's Transport Strategy is published containing its current ambition to allow motorcycles and scooters to use all bus lanes across London, we will proactively review our current policy including a local consultation. The aim of this review would be to determine how best to make Islington's bus lanes safer for all vulnerable road users. In advance of such a review, we would be grateful for any data TfL can provide demonstrating the impacts on safety for various road users since motorcyclists and scooters were granted permission to use bus lanes on the TLRN.

Improving air quality; 'zero carbon'

Islington Council was the first borough to successfully pass a referendum to set **parking permit charges based on vehicle emissions**. We were also the first to implement a parking permit **surcharge for diesel vehicles**, have successfully established a very strict **car-free development policy** to reduce car ownership, and continue to be a leader on **electric vehicles, cycle hire and car sharing**. In addition, we have established a ground-breaking **combined heat and power** facility to use waste heat from the Underground and other sources to heat local homes, thereby reducing carbon emissions.

Still, Islington suffers very poor air quality and more must be done to improve the air we breathe. We therefore enthusiastically welcome the strategy's commitment to make London a zero carbon city by 2050, and fully support the proposal to establish a central London **Ultra Low Emission Zone** by 2019, its expansion to cover all of London for heavy vehicles by 2020, and its expansion to inner London for all other vehicles by 2021. However, the last of these stages is currently proposed to **exempt taxis**. We

recognise taxi services as an important part of the sustainable transport mix, particularly in making it possible for people not to own a car. We are also grateful that from January 2018 it will no longer be possible to purchase a diesel taxi. But as stated in our response to the original ULEZ consultation in August 2017, Islington Council does not agree that the taxi industry should be exempted from the requirement to modernise their vehicles and reduce their emissions. We would welcome a commitment in the strategy to carry out a cost-benefit analysis comparing the cost of subsidies that might be required to ensure that the entire taxi fleet is able to comply with the ULEZ, with the health impacts (and costs) of continued taxi emission levels should taxis be exempted from the ULEZ as currently proposed.

Through our own detailed research and examination of 'real world data', we don't believe that there is any clean diesel vehicle yet produced or likely to be produced any time soon. In March 2017 we publicly called on London to join Paris, Madrid and Mexico City in getting rid of the most polluting vehicles within a decade. We are wanting a diesel-free London by 2025. We recommend that this becomes an ambition set out in the Mayor's Transport Strategy. We believe a diesel-free London is achievable sooner with the right policies and subsidies in place. This ambitious push could be paid for at least in part by reducing the health costs currently resulting from diesel pollution, with so many other side benefits also being achieved as a result of improved air quality. The Council continues to request that TfL provide an all-hybrid fleet at the Holloway Bus Garage as soon as possible. And making London diesel-free by 2025 requires not only tackling road traffic emissions but also rail emissions, so we look forward to working with you to ensure that all rail services through London (including freight) are electrified by 2025.

The process of delivering a network of **electric vehicle charging points** to facilitate the take up of zero-emission vehicles has only just begun, and we look forward to continuing to work with you to extend the existing network of charging points. A wider network is needed not only to promote conversion of privately-owned conventional vehicles to electric, but to work towards a fully electric car sharing fleet. Even conventional car sharing vehicles have been shown to reduce emissions by reducing car ownership and therefore actual car use, but these benefits are even greater if electric vehicles are used. We would welcome the strategy making a stronger commitment to increasing car sharing throughout London, and particularly electric car sharing vehicles.

Improving the public transport experience

For many Islington residents, buses represent their primary mode of travel. We welcome the introduction of a public transport fares freeze to 2020, and the introduction of the 'Hopper' fare has made bus travel much more affordable and therefore more attractive for some passengers. We also welcome the strategy's commitment to improving bus services, and suggest that the strategy contain an ambition to ensure that bus services reach the same world-class level of service quality that has been achieved on many Underground services. This could include free wi-fi on London's buses, as has been provided in many Underground stations, and we would encourage TfL to explore the potential for the on-board announcements on buses to provide interchange information about connecting services, including their arrival times. We believe this would be particularly valuable at night.

Islington Council welcomes the Night Tube and Night Overground and we eagerly await the addition of the Bank branch of the Northern Line to the Night Tube network, to serve the night-time economy around Angel and Old Street. However, the Council would like to see night bus services retained. Many of Islington's residents live on low incomes, often carrying out jobs outside of normal office hours, requiring them to use the night bus network. These types of jobs are not always associated with the highest salaries, so night buses offer a much more attractive option than the Night Tube.

Islington Council agrees that the delivery of Crossrail 2 is essential to relieve crowding both for existing lines such as the Victoria and Piccadilly lines, and for the future High Speed 2 service, to avoid its passengers flooding the already crowded Underground network at Euston. In addition, we hope that lessons learned during the construction of the Elizabeth Line are taken into consideration during the implementation of Crossrail 2. For instance, we welcome the use of local labour employment and community investment, TfL's plans to adopt best practice construction techniques to reduce noise and vibrations from construction, and the transportation of construction waste and rubble out of London via rail instead of via lorry.

Following the successes of introducing the initial London Overground lines, Islington supports **devolution of further National Rail services**. We would like to highlight the potential for TfL to take over running of the **Great Northern railway services from Moorgate** to Welwyn Garden City and Stevenage, thereby boosting the level of service quality and customer satisfaction resulted from the previous inclusion of other lines in the London Overground network. This devolution could also be an opportunity to improve provision for **the carrying of bicycles on trains**, which has not been catered for particularly well on other rail services or to date on existing Overground lines. We would also welcome an investigation into the feasibility of **increasing the service frequency on the Gospel Oak to Barking line**, and allowing services to continue through Gospel Oak to Richmond. These improvements would help make the line into a regular metro-style rail service that is fully integrated into the wider public transport network, whilst at the same time reducing crowding and improving accessibility along the line.

We fully support the proposed programme of **station capacity improvements**, but would like to highlight the particular need for capacity expansion at stations like **Highbury & Islington** and **Old Street**. In addition, major investment is urgently needed at **Finsbury Park** station to transform one of the busiest stations outside of zone 1 into a successful public transport interchange, especially in recognition of the increased importance of the station following the imminent arrival of Thameslink services at the station from 2018. All three of these stations are very crowded already, including experiencing regular closures due to passenger numbers. These pressures are likely to get worse with increasing numbers of people using the Underground and London Overground, supported by the planned upgrades of Underground and Overground lines.

We generally support **new rail stations** across London wherever needed, and the integration of new housing and employment as part of the station developments. However, we would like to specifically request that TfL examine the potential role of disused stations, like **Maiden Lane station**, on London Overground (just within Camden). Re-opening Maiden Lane station would support the increasing levels of development in the area, including at King's Cross Central in Camden, but also around Brewery Road/Vale Royal in Islington. In addition, they could help to relieve congestion at Kings Cross and St Pancras stations. Maiden Lane could also become the terminus for East London Line Overground services, thus reducing congestion on the Victoria Line between Highbury & Islington and Kings Cross St Pancras Underground stations.

We welcome the proposal to upgrade and extend the Docklands Light Railway (DLR), but recommend that consideration be given to an extension of the DLR to Euston. Such a service could relieve congestion on various Underground lines, and could better connect HS2 to east and south-east London.

Managing road traffic

Islington's road network suffers from high levels of traffic congestion, despite the Council's successes in substantially reducing car ownership by its residents over the past decade. London's continued

growth will increase congestion further unless carefully managed. We therefore welcome the strategy's emphasis on prioritising access to the road network for essential trips.

We particularly welcome the strategy's commitment to investigating and developing new and more dynamic forms of **road user charging** for London, including workplace parking levies. The Congestion Charge has been a great success, but only addresses congestion in Central London. While I am pleased that the strategy invites boroughs to pursue their own forms of road user charging, the Congestion Charge was only able to be implemented because it was led by the Mayor of London and not by an individual borough or boroughs. We hope that you will continue to take the lead on road user charging, and we believe the strategy would be strengthened if it incorporated a clear statement that Transport for London will develop and adopt any model of charging that is seen to be beneficial for London as a whole.

Although the proposed **Silvertown Tunnel** does not directly impact Islington, we question the inclusion of this proposal within the strategy as we feel the commitment to investing in this new road tunnel is somewhat at odds with the rest of the strategy. If funds were instead invested in public transport improvements, and if the new road charging regimes mooted earlier in the strategy were found to be successful in reducing road traffic demand, then this additional road capacity could be proven unnecessary. We believe it would be wiser and more cost-effective to pursue new road pricing mechanisms first, and to see if these mechanisms can successfully manage the demand for additional river crossing capacity before substantial public funds are invested in potentially encouraging additional trips by car in London.

Delivering the Strategy

We are committed to helping you to deliver this ambitious new strategy. However, much of the strategy will be implemented by boroughs rather than by Transport for London, and this work will require a substantial increase on current levels of local investment. Islington's response to the previous draft Mayor's Transport Strategy (January 2010) raised issues with the formula that had been proposed (and was later implemented) for **distributing funds to each borough** through the Local Implementation Plan (LIP) framework. Currently the formula is focused largely on the number of kilometres of roads within each borough, which simply leads to large boroughs getting more money regardless of the range of factors affecting boroughs' actual need for transport funding. In addition, inner London boroughs face pressures and increased costs as a result of travel between Central and Outer London passing through our boroughs. We therefore believe that the LIP funding formula should be made more fair by better taking into account density, forecast growth in population and employment, and existing social deprivation.

We are pleased to see **ambitious targets** such as making London a diesel-free and carbon-free city, and achieving modal shift towards more active forms of travel. However, we are concerned that the absence of shorter-term interim targets will make it harder to determine that real progress towards these laudable goals is being achieved during the life of the strategy, or that additional measures are required. We would therefore welcome **interim targets and achievable milestones** throughout the strategy, as has been done for road traffic casualty reduction.

To ensure that the new strategy is successful, it is essential that **all boroughs work co-operatively** with the Mayor of London and Transport for London to make every street in London safer, encourage more active forms of travel, improve London's air quality and reduce private car use. Islington Council has a strong track record of delivering positive transport outcomes, and we look forward to continuing to work with yourself, with TfL and with neighbouring boroughs to help others to benefit from our own achievements, and to play our part in the development of new approaches and solutions as this new

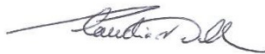
strategy is adopted and put into practice. We would encourage you to **require compliance with your strategy** within every borough across London, as individual boroughs cannot achieve the potential benefits of this strategy on their own.

Concluding comments

The draft Mayor's Transport Strategy is a very strong document already, and we are grateful for the opportunity to submit a number of suggestions as to how the strategy could be further strengthened. I have outlined many of these suggestions in this letter, but the attached technical note sets out more detailed suggestions on individual policies and proposals where I hope you will consider making amendments before adopting the final strategy.

I trust the comments and suggestions made above and in the attached technical note will be of use to yourself and to TfL as the strategy is finalised, and we look forward to receiving the final strategy and LIP guidance, and indeed working closely with you as the strategy is successfully implemented.

Yours sincerely,



Councillor Claudia Webbe
Executive Member for Environment and Transport

c.c.

CLr Richard Watts, Leader, Islington Council

Technical Note

Response to key policies and proposals of the Draft Mayor's Transport Strategy



Introduction

In response to the Mayor's consultation on the draft Mayor's Transport Strategy, Islington Council strongly supports the overall vision for transport in London as set out within the draft strategy. Our genuine support is demonstrated through the actions we have already taken that align with most of the strategy's policies and proposals.

The Council has provided specific comments below on some of the policies and proposals put forward in the strategy to provide an Islington context, to highlight areas of particular support, and to make constructive suggestions for improving the final strategy. We look forward to working constructively with the Mayor to ensure the success of the strategy.

Chapter 3 – Healthy Streets, Healthy People

Islington Council is very supportive of the Healthy Streets approach, and has been working towards this vision for many years through its existing transport vision. Some examples of the many projects where we have facilitated greater up-take of active travel include implementing new and upgraded cycle routes, providing cycle training for children and adults, creating Safer Routes to Estates, and implementing public realm improvements such as the hugely successful new public space in Archway created in co-operation with Transport for London. These projects and many others are helping to encourage more active travel by reducing the dominance of road traffic throughout Islington, and making roads safer for vulnerable road users.

A cornerstone of promoting healthy streets in Islington has been the implementation of a borough-wide 20mph limit in 2013. This has not only improved road safety, but has also contributed to a reduction in noise levels. We are also working to reduce emissions and improve air quality, as demonstrated by the fact that we are helping to lead London's roll-out of rapid electric vehicle (EV) charging points. In connection with this, we are helping car club operators to achieve a diesel-free fleet and enabling the electrification of our borough-wide car club network, continuing our pioneering status.

Islington Council believes that no diesel is 'clean', or safe. We were the first borough to successfully pass a referendum to set parking permit charges based on vehicle emissions. We were also the first to implement a parking permit surcharge for diesel vehicles, have successfully established a very strict car-free development policy to reduce car ownership, and continue to be a leader on electric vehicles, cycle hire and car sharing. Following the electrification of the Gospel Oak to Barking line, we would like to gain further air quality benefits through the electrification of all rail lines in London, including freight. In addition, we have established a ground-breaking combined heat and power facility to use waste heat from the Underground and other sources to heat local homes, thereby reducing carbon emissions.

PO1 Promote and encourage active travel – Islington Council is fully supportive of this policy, though we believe that encouraging and facilitating active travel goes beyond road safety measures and streetscape improvements. We are reassured that the issues of inclusivity and accessibility are recognised in policies and proposals later in the strategy, though we believe that while these two issues do need their own focus, they also need to be considered together. We therefore ask that when designing streets and public spaces with active travel in mind, TfL consider the specific needs of children and young people, older people and those with mobility impairments, and others who may not consider themselves to be disabled but nevertheless face barriers to active travel and using public transport.

Similarly, although the strategy acknowledges the contribution of active travel on mental health, it does not refer to the unique barriers faced by people with mental illnesses in accessing public transport or in undertaking physical activity. For instance, dementia can stop people using transport if they are not adequately supported. Orientation, wayfinding and familiarity all contribute to an accessible environment for people with dementia, as does a reduction in unnecessary clutter and potentially disorienting visual and auditory stimuli. The strategy would benefit from considering in detail the barriers faced by people with dementia, and identifying actions to improve the lives of people with dementia.

While concerns about road safety and air pollution create a further barrier to active travel, the strategy should make clear that according to an Imperial College study, in all but the most extreme air pollution concentrations, the benefits of physical activity from active travel outweigh the harm caused by air pollution. With regard to concerns around road danger, we believe that traffic speeds and volumes can be reduced through a 'cellular' system in some neighbourhoods, permitting local vehicle access but preventing unnecessary through traffic.

Investing in better streets and spaces for walking can provide a competitive return compared to other transport projects. The Council would like to see the economic benefits of walking and cycling identified in the strategy and recognition of the good benefit-to-cost ratio of investing in cycling and walking schemes.

PR1 High-quality public realm – Following the successful delivery of public realm improvements at Archway, the Council is working with the Mayor to make improvements at Old Street and Highbury Corner, and on the removal of King's Cross gyratory. We urge the Mayor to work with the Council to continue to deliver high-quality public realm improvements at key locations such as Clerkenwell Green, Old Street / Clerkenwell Road, Holloway Road and the Nags Head. The strategy could address more directly the impact on communities of traffic volumes on major roads. There is a wealth of evidence on the negative impact of highly trafficked roads on the social networks of local residents and their use of streets as social spaces.

PR2 Walking and cycling environment in Central London – Islington Council supports this proposal, and recognises the need for substantial improvements throughout Central London and particularly at Oxford Street and Parliament Square. But we believe transformational schemes of this nature should not be limited to Central London, and that this proposal should also acknowledge the need for transformational schemes in the denser parts of Inner London. Working with TfL, we have demonstrated success at Archway and continue to work with TfL to develop and deliver significant transformations at Old Street and Highbury Corner. We look to the Mayor and TfL to co-ordinate these schemes and to help manage their cross-boundary impacts. The Council is pleased that four of the 33 junctions identified for improvements to address safety concerns are in Islington (Holloway Road / Tollington Road, Holloway Road / Drayton Park, Highbury Corner, and Farringdon Road / Clerkenwell Road). We also welcome the significant improvements for walking and cycling that will come from proposals to remove the roundabout at Old Street, and to unpick the King's Cross gyratory. However, there are many other junctions where small-scale or large-scale improvements are needed to encourage walking and cycling and to reduce casualties.

PR3 Cycle routes and infrastructure – Islington Council supports this proposal, as investment in cycling routes reduces pressures on the public transport network whilst also facilitating active travel within and through the borough. We are therefore fully committed to resolving missing links in the cycle network, particularly in those areas not covered by the dense Central London cycle network. However, completing a safe and attractive cycle network could be accelerated significantly if the funding available to boroughs can be increased, and boroughs can also begin working to meet future demand on the corridors identified in TfL's Strategic Cycling Analysis (June 2017) if funding can be provided to the

boroughs to develop these proposals. In Islington, the relevant corridors identified by TfL include Kentish Town to Wood Green, Camden Town to Tottenham Hale, and Finchley to Archway.

PR7 Working with schools, employers and communities to promote walking and cycling – Islington Council supports this proposal. We believe that good quality cycle parking and travel plans for every school would help build walking and cycling into the daily routines of parents, pupils and school staff. School travel plans should take into account local air quality and be more ambitious where air pollution is an issue. The Council's development management policies ensure that development supports active travel. We also promote active travel with businesses and residents.

PR9 / PR10 Road danger reduction – Islington Council supports the proposed measures. However, it is important that TfL commits to eliminating road dangers on its own road network, as these represent the busiest and often fastest and therefore most dangerous roads in London. We believe a blanket London-wide 20mph speed limit incorporating roads in London will be essential in achieving 'Vision Zero'. We also need to see far stricter enforcement by the Met Police to eliminate casualties resulting from traffic violations such as speeding, dangerous driving, use of phones while driving, driving while intoxicated, and failing to indicate while turning. Special attention should be paid to HGVs, including extending and strengthening the Fleet Operator Recognition Scheme (FORS), Construction Logistics and Community Safety (CLOCS) programme, and other safety requirements. We would welcome a Direct Vision Standard for HGVs and we would like to see a strict timeframe for the full transition to this.

PR11 Improve motorcycle safety – Islington Council supports measures to improve motorcycle safety. We would also welcome evidence from TfL to assist ourselves and other boroughs as we consider whether permitting motorcycles in bus lanes is likely to enhance motorcycle safety and make bus lanes as safe as possible for all permitted road users (including cyclists). TfL's permanent decision to allow motorcycles to use bus lanes was based on a reduction in journey times and relatively low emissions for motorcyclists observed during a trial. The evidence presented by consultants TRL in their 2011 report analysing the results of the trial showed an increase in collisions during the trial, and therefore does not present a conclusive road safety case for permitting motorcycles in bus lanes. The Council would like TfL to carry out an assessment of the accident statistics since motorcycles were permanently permitted to use bus lanes on the TLRN, to provide the evidence required to consider how a uniform approach to motorcycle and scooter use of bus lanes could best improve road safety for all vulnerable road users. Additional training and enforcement to prevent dangerous overtaking of cyclists in bus lanes could be considered. The proposed measures for increasing motorcycle safety are innovative, and could also be extended to cover bicycles, such as additional Police enforcement activities and education of other road users.

PO3 / PR12 Crime, the fear of crime and safeguarding of the most vulnerable – Islington Council supports this goal. However, the research from our Fair Futures Commission, which explored the views of children, young people and families in Islington in relation to place and transport, highlighted to us not only that the needs of all vulnerable groups cannot necessarily be grouped together, but also that the variety of opinion and perceptions within these groups themselves must be appreciated. We believe this could be more fully delineated in the strategy to ensure that measures delivered as part of the strategy actually address the needs of all vulnerable road users. The Council is committed to creating safer places for our children and young people to grow up in, where they can learn and enjoy, and in doing so we will involve children and young people in the design and the decisions governing areas where young people frequent. We also believe the strategy should explicitly state the importance of protecting the staff working within the transport system, keeping them protected while carrying out their duties.

The Council would like to see suicide prevention addressed within the Mayor's Transport Strategy. In 2016/17, British Transport Police (BTP) reported eight suspected suicides, five injurious attempts, and 376 pre-suicidal / mental health incidents in Camden and Islington alone (the area covered by the Council's Public Health team and our developing Suicide Prevention Strategy). Suicide is therefore not a minor issue, and there is much that a transport strategy can do to address this problem. The suicide prevention work by the BTP, Network Rail, the Train Operating Companies and the Samaritans should be reflected in the strategy.

In delivering the Hate Crime Strategy (2016), the Council is working with the TfL and the BTP to address the issue of hate crime on London Buses.

PR13 Motorcycle theft and motorcycle-enabled crime – Islington Council fully supports this proposal. Islington suffers disproportionately from motorcycle and moped enabled crime – 2,417 moped-related offences were recorded in Islington during 2016/17. Those stolen vehicles go on to facilitate an increasing level of crime and anti-social behaviour. While we do not permit developers to provide off-street motorcycle parking, we are actively working to improve the security of on-street facilities. The Council is working with the Met Police 'Designing Out Crime Team' to address specific areas, and is developing innovative methods to prevent theft of these vehicles and to tackle this type of crime through design. This is an under-resourced area of work, though, and with additional resources the Council could better secure the specialist technical support required to address these issues.

Tackling cycle theft is an important element of supporting mode shift. The Council was very disappointed when the Police Cycle Task Force was abolished, and would welcome its reinstatement. In addition, greater focus is needed from the Met Police and Safer Neighbourhoods Teams to crack down on cycle theft across London, and particularly in Islington.

PO4 Prioritise space-efficient modes of transport – Islington has been a pioneer in developing car clubs and car sharing to reduce private car ownership and use, with around 19,000 car club members in the borough. Car clubs can significantly reduce the number of vehicles on the road, while ensuring those cars used for essential journeys are new, less-polluting models. Car club vehicles occupy less space than the multiple privately-owned cars they replace, thus providing an opportunity to re-assign kerb-side space. Car Club vehicles tend to be newer and therefore more efficient (or electric) vehicles than the average privately-owned vehicle, and tend not to be used during peak hours. A reduction in private car ownership has also resulted in an increase in active travel and use of public transport, according to years of member surveys carried out by national car sharing charity 'Carplus'. The success of car clubs in Islington should be replicated across Greater London, with a focus on an increased roll-out of electric vehicles.

PR15 Efficiency and safety of freight services – While we support improving the efficiency and safety of freight and servicing, we would like to highlight that some of the proposals included in the strategy would require new powers to be given to local authorities to allow construction traffic consolidation. However, if provided with these powers, we would do what we feasibly could to help further this proposal.

PR19 Road user charging – Islington Council supports development and implementation of new road user charging systems and workplace parking levies. We believe, however, that this proposal should go beyond the consideration of potential models and instead actually commit TfL to finding the best form or forms of road pricing and to develop and deliver these systems to promote mode shift and reduce air pollution. We would certainly be interested in pursuing road user charging in Islington should suitable models be found, but we believe that the best forms of road user charging are likely to require London-wide or multi-borough administration rather than being implemented by an individual borough.

PR20 Support borough traffic reduction strategies – Islington supports this proposal as we believe it is important that individual local authorities' efforts to reduce traffic are co-ordinated by TfL so that their strategies work together. We already plan to propose a traffic reduction strategy for Islington, and we are open to proposing re-designs of key streets where reducing traffic is essential to protect vulnerable road users or improve a place as a destination for visitors and shoppers.

The Council believes that traffic speeds and volumes can be reduced through a 'cellular' system in some neighbourhoods, permitting local vehicle access but preventing rat-running. We believe this approach could form a central part of a traffic reduction strategy for Islington, and would welcome the opportunity to develop the concept with the Mayor and TfL.

PR22 / 23 Central London Ultra Low Emission Zone and bus emissions standards – We fully support the Central London Ultra Low Emission Zone (2019), the expansion to London-wide for heavy vehicles by 2020 and the expansion to inner London (including all of the London Borough of Islington) for all other vehicles by 2021. The Council agrees that far-reaching action is needed to address London's poor air quality, and while the current ULEZ scheme will make a valuable contribution, we believe it can be significantly improved. Furthermore, the ULEZ should be treated as a transitional arrangement on the way to removing all polluting vehicles from London's road network. However, the last of these stages is currently stated as exempting taxis. We recognise that taxi services form an important part of the sustainable transport mix, particularly for those who do not own a car, but we wonder what level of investment would be required to include taxis in the ULEZ by 2021. We suggest that a cost-benefit analysis be carried out to compare the health impacts (and costs) of taxi emissions with the cost of partially subsidising taxis to reduce their emissions in line with other transport sectors. Such an approach would also reduce fuel costs for taxi operators.

The Council agrees that single-decker buses should meet at least Euro VI standards in 2019, and be zero-emission at tailpipe by 2020. The Council would like assurances that independent real world emission testing will be carried out to provide evidence that the stated benefits will be achieved.

The Council would like TfL to prioritise future provision of zero and hybrid buses on Islington's bus corridors north of the proposed ULEZ area (Islington High Street/ Upper Street, Holloway Road and Seven Sisters Road), where NO₂ levels are exceeding the 40 ug/m annual mean standard. The Council continues to request that TfL provide an all-hybrid fleet at the Holloway Bus Garage as soon as possible.

PO5 / PR27 / PR29 Improve air quality – Islington Council welcomes additional measures to reduce air pollution and vehicle emissions. The Council has established Zero Emission Networks (ZENs) at Archway and the City Fringe, as well as a Low Emission Neighbourhood (LEN) and Neighbourhoods of Future (NoF) at the City Fringe. We have also delivered many individual projects to actively reduce emissions. It is through these initiatives that we are also pioneering measures to prioritise space efficient, low emission modes of transport. We would be happy to help other boroughs to adopt similar policies.

While the strategy sets out a very ambitious long-term goal of making London zero carbon by 2050, it could be strengthened through the inclusion of an interim London-wide ban of diesel vehicles by 2025. Diesel vehicles have by far the most damaging effect on human health, and there is a substantial health cost for every year that diesel vehicles of any kind remain on London's roads. We recommend that a cost / benefit analysis be carried out to see if the cost of eliminating diesel emissions sooner than proposed would be worthwhile, i.e. whether greater subsidies would be paid back through the reduced health costs that would be achieved. We suggest the same for PO6 (see further comment on this policy below).

Similarly, we suggest a comparison of the costs of raising emission standards more quickly for **private hire vehicles**, and the health costs of not doing so. These vehicles make up a substantial proportion of the road fleet in London, so it would be a missed opportunity not to reduce their emissions in line with other commercial fleet vehicles. We would like to see further policy incentives to accelerate both the take-up of zero emission capable vehicles, and the actual operation of these vehicles in zero emission mode.

PR24 Air pollution alert system – Islington Council has developed its own air pollution alert system (*airTEXT*) that has been adopted by other local authorities. We would support this proposal and would be happy to work with TfL to extend the benefits of air pollution alert systems to other boroughs.

PO6 Make London's transport network zero carbon by 2050 – Islington Council supports this policy. We recommend, however, that the Mayor considers providing interim relief or exemption for specialist Council fleet vehicles that cannot currently be replaced with low emission vehicles, such as those used for refuse collection. Additional investment towards further developing these new vehicle technologies should also be considered, as well as financial support to facilitate their rapid adoption by boroughs as they emerge.

PR30 Adoption of ULEVs in borough fleets– The Council supports this policy and continues to be committed to reducing emissions from our fleet, including partners and contractors' vehicles. We have allocated over £6 million to purchase new ULEVs and infrastructure at Council sites to ensure compliance of the fleet with the 'Toxicity Charge' due to take effect imminently, and with ULEZ from 2019. Many older, higher polluting vehicles have already been replaced, and this will continue through to 2020. We would like to see the strategy make reference to extending the availability of refuelling infrastructure to allow refuse vehicles to run on bio-fuels.

PR33-39 Specific measures to reduce emissions and improve air quality – Islington Council believes all of these proposals are innovative and worthy of support. We support the statement in the strategy that all rail lines in London should be electrified.

PO8 Ensure resilience to severe weather in London's transport – We fully support this proposed policy, though we believe that if this vision is to be achieved, adequate funding must be provided to boroughs for gritting cycle routes in snowy and icy weather. This is a design requirement of new cycle routes, but local authority gritting budgets are already stretched and no supplementary funding is proposed as substantial new cycle routes progress towards implementation.

PR46 / PR47 Noise pollution and vibration – Islington Council supports these proposals and is looking at using surface materials that reduce noise from road transport. We are grateful that the initial concerns raised following the introduction of the Night Tube were addressed very quickly. Islington Council would therefore expect a similarly quick and responsive approach when the Night Overground is introduced. The strategy could also benefit from better acknowledgement of the benefits of bicycles as another silent form of transport.

Chapter 4 – A Good Public Transport Experience

Islington Council is supportive of the proposals and policies in this chapter. We are thoroughly in agreement that improving the experience of public transport is imperative to mode shift, and to address deprivation and deliver economic regeneration. Much of the power to do this currently rests with TfL, so we look forward to working with the Mayor and TfL to improve public transport in Islington and deliver this vision. We are already working with TfL to ensure the delivery of the charging network necessary for the electrification of the taxi fleet. In addition, we would like to highlight the methodology of Islington

Council's Fairness Commission and Fair Futures Commission as positive examples of how to engage with the public to improve our understanding of people's vastly different experiences of the transport environment, and to help ensure that policies and services provide for everyone's needs.

PR48 Healthy Streets transformation near transport facilities – Islington Council fully supports improving the quality of public realm around rail and bus stations, and we would like to highlight the positive work currently underway around stations such as Archway, Old Street, Highbury & Islington and Farringdon. However, there is a need for improvements to the appearance of the stations themselves at Archway and Highbury & Islington to complement the recent and planned public realm and highway improvements around these stations. There furthermore remains a need for further work around Finsbury Park Station, and at the disused station entrances at Angel (City Road / Torrens Street) and Highbury & Islington (on the Highbury Fields side of Holloway Road). We look forward to working with TfL to improve these station environments. In addition, improvements to terminus stations throughout Central London should seek to facilitate and encourage greater use of active and sustainable transport for onward travel, such as through making cycle parking and cycle hire more prominent than taxi ranks and drop-off zones.

PO10 / PR49 Affordable travel for all – Islington Council strongly supports the Mayor's fares freeze, and welcomes this policy and proposal. The introduction of the 'Hopper' fare has made bus travel much more affordable, and therefore more attractive for many passengers. We suggest that the methodologies of Islington's Fairness Commission and Fair Futures Commission are considered by the Mayor to research and demonstrate need across London.

PO12 / PR52 Enhance accessibility of street and public transport networks – Islington Council supports this proposed policy. We also believe that explicit consideration should be given to the accessibility of cycle routes and parking to ensure that disabled cyclists are not discriminated against.

PO13 Transform the quality of bus services – Islington Council strongly supports this proposal. We want buses to be as attractive as the tube and more attractive than cars for shorter journeys. Free wi-fi on buses could be one potential measure worth considering in achieving this.

PR53 Adjust bus service volumes – Islington Council supports this proposal. High service frequencies are key to attracting passengers to bus services. Bus services provide an essential and affordable means of transport, particularly for those who need to avoid the additional cost of using the Underground or rail network for part of their journey, and those who need to travel when these services are not available. The Council would like assurances from TfL that the impacts of any proposed changes or reductions in service will be carefully monitored, particularly to establish their impact on vulnerable users in terms of accessibility, journey time and cost. We would want to be closely involved in proposals affecting Islington.

PO11 / PO14 / PR63 / PR67 Transform rail-based services and increase service and station capacity – Islington Council is supportive of these policies to encourage the use of public transport. We have concerns, however, that the Victoria and Piccadilly lines would remain crowded by 2041 even if the MTS goal of 80% capacity expansion is achieved (i.e. even if Crossrail 2 can be built), in which case further investment is still needed. We would also welcome much needed capacity improvements at Highbury & Islington, Finsbury Park, Archway and Old Street stations to ensure that increased service capacity to relieve on-board overcrowding will not add to existing station capacity issues. Finsbury Park in particular is in need of investment, especially in recognition of the increased importance of the station following the imminent arrival of Thameslink services at the station from 2018.

PR55 Real-time data, information and visualisations – Islington Council is supportive of this proposal, though we note that Countdown information at bus stops appears to be on the decline rather than expanding. Unless an alternative is proposed, we would welcome the roll-out of Countdown information to all significant bus stops in Islington and throughout London. We continue to be supportive of TfL as it completes the roll-out of the integrated bus stop information board they are currently developing for Archway Station, and would encourage its utilisation at other similar stations where buses depart from a range of bus stops in the vicinity of the station. We encourage TfL to explore the potential for the on-board announcements on buses to provide interchange information about connecting services, including their arrival times. We believe this would be particularly valuable at night.

PR56 / PR71 Finalise Crossrail 2 – Islington Council agree it is essential that the delivery of Crossrail 2 complements and relieves crowding, both for existing lines such as the Victoria and Piccadilly lines, and for the future High Speed 2 service, to avoid its passengers flooding the already crowded Underground network at Euston. In addition, we hope that lessons learned during the construction of the Elizabeth Line are taken into consideration during the implementation of Crossrail 2. For instance, we welcome the use of local labour employment and community investment, TfL's plans to adopt best practice construction techniques to reduce noise and vibrations from construction, and measures to transport construction waste and rubble out of London via rail instead of via lorry.

PR59-61 and PR95 Devolved responsibility for London-stopping National Rail services and improved airport links – Following the successes of creating the initial London Overground lines, Islington supports devolution of further National Rail services where appropriate. Specifically, we would like to highlight the potential for TfL to take over running of the Great Northern railway services from Moorgate to Welwyn Garden City and Stevenage, thereby boosting the level of service quality and customer satisfaction as has resulted from the introduction of previous London Overground lines. We believe the proposals concerning the devolution of the National Rail Services should also explicitly mention using this opportunity to improve bicycle carriage facilities. Similarly, such changes should also be carried out on any new or improved rail links to airports.

PR65 Upgrade the Docklands Light Railway (DLR) – Islington Council welcomes the proposal to upgrade and extend the Docklands Light Railway (DLR), but we recommend investigation of the feasibility of extending the DLR from Bank to Euston, via the south of Islington. Such a service could relieve congestion on various Underground lines, and could better connect HS2 to east and south-east London.

PR72 New coach facilities – Islington Council supports this proposal, though we do not believe there are any suitable locations for a coach hub in Islington.

PO17 Support the growth of the night-time economy – Islington Council welcomes the Night Tube and Night Overground. We also eagerly await the addition of the Bank branch of the Northern Line to the Night Tube network, to serve the night-time economy around Angel and Old Street. Appropriate levels of policing within and around stations must also be provided. The Council would like to see night bus services retained. Many of Islington's residents live on low incomes, often carrying out jobs outside of normal office hours, requiring them to use the night bus network. These types of jobs are not always associated with the highest salaries, so night buses offer a much more attractive option than the Night Tube.

PO18 World-class taxi and private hire services – Islington Council is supportive of this proposal. We are currently working with TfL to deliver the charging network required for the electrification of the taxi fleet. We welcome measures that will make taxis and private hire vehicles fit for purpose, including

reducing their emissions and ensuring that they are safe for their passengers, their drivers, and other road users.

Chapter 5 – New Homes and Jobs

Islington Council supports the vision set out in this chapter of creating safe, healthy, well-connected and thriving neighbourhoods. We have been very effective in our own work that aligns with this vision. For example, despite being the densest borough in London, Islington Council has consistently exceeded the Mayor's housing delivery targets for the borough and is a leading local authority in terms of securing affordable housing.

We have also been successful in securing car-free housing and commercial developments through the planning process, and have implemented a £96 annual surcharge on resident permits for diesel vehicles. Parking charges apply 24/7 to support modal shift away from private car ownership and use. We would encourage the Mayor to support the requirement of car-free development when making planning decisions through his call-in powers.

PR79 Housing delivery and healthy places through Crossrail 2 – Islington Council welcomes the delivery of affordable housing, particularly outside of the Central Activities Zone. While there may be only limited potential for housing development around the proposed new Crossrail 2 station at Angel, where increased office space and appropriate town centre employment opportunities are needed, we will work with the Mayor to identify any suitable opportunities for further housing and particularly affordable housing development.

PR62 / PR84 Economic and housing development through improved public transport around 'mini-radial hubs' – Islington Council is very supportive of this goal, though attention must be given to some of the realities of delivering these proposals. It is essential that TfL engage openly with local communities where such schemes are proposed. We would like to see Maiden Lane station re-opened on the Overground to improve access and connectivity and to support development in the area north of Kings Cross. Maiden Lane station is just beyond the borough boundary within Camden, but would benefit Islington residents and would help to reduce congestion within Kings Cross and St Pancras stations. We would also like TfL to work with the Council to re-examine the future use of York Road station and how the disused station can best serve the region. Electrification and increased frequency of the Gospel Oak to Barking (GOB) line may lead to densification and development around stations serving the line, and increased frequency and further improvements such as allowing GOB trains to continue to Richmond could provide further benefits.

PR88 / PR90 Silvertown Tunnel and further river crossings in east London – Although the proposed Silvertown Tunnel does not directly impact Islington, we question the inclusion of this proposal within the MTS as we feel the commitment to investing in this new road tunnel is somewhat at odds with the rest of the strategy. If funds were instead invested in public transport improvements, and if the new road charging regimes mooted earlier in the strategy were found to be successful in reducing traffic demand, then this additional road capacity could be proven unnecessary. We believe it would be better for air quality and more cost-effective to pursue new road pricing mechanisms first, and to see if these can successfully manage the demand for additional river crossing capacity before substantial public funds are invested in potentially encouraging additional trips by car in London.

Chapter 6 Delivering the Vision

Islington Council's current transport policies already align closely with the proposed policies and proposals in this strategy, and we have delivered many projects and improvements that are also

consistent with the strategy, as set out within this response. Although we have also provided a number of suggestions for improving the strategy, including re-considering the funding arrangements to assist boroughs in helping to implement the strategy locally, we look forward to working with the Mayor and TfL to deliver the ambitious vision set out in this draft strategy.

PR97 Up-to-date information and payments platforms – Islington Council is supportive of this policy, but we urge that fairness and accessibility are borne in mind when designing and delivering these systems.

PO22 Adequate and fair funding to deliver the strategy – Islington Council supports the principle of this policy. The Council would like it acknowledged that much of the strategy will be delivered by boroughs, thus requiring greater funding for local implementation of the strategy. In addition, the funding made available to boroughs for local delivery should be more fairly distributed. We believe that the LIP formula would benefit by better taking into account density, forecast growth in population and employment, and existing social deprivation.

PR102 Specific financial measures to fund the delivery of the strategy – Islington Council supports the measures outlined in this proposal, and believes that they will help to strengthen economic development across London.

Draft ‘Guidance on developing the third Local Implementation Plans’

We look forward to developing an up-to-date Local Implementation Plan and Transport Strategy for Islington Council over the next 18 months, and feel that the draft guidance is fairly clear. However, we would like to make the following two suggestions:

- We support London Council’s suggestion that TfL should reinstate the £100,000 annual borough Transport Fund. With an increasingly prescriptive LIP and ever-growing pressure on resources, this funding is essential for progressing local priorities that may not always fall clearly within TfL’s tightly-defined programme areas.
- We support London Council’s suggestion to review the proposed reporting requirements, and the targets and delivery indicators proposed for monitoring of LIPs.