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COMMENTS ON GREENWICH CONSULTATION DRAFT TRANSPORT STRATEGY

This 103-page document describes several noble objectives, but we can't see it "delivering a world-class transport network" (whatever that means) and all the stated environmental objectives in its current form. It acknowledges that car ownership in the Royal Borough has increased since 2016 and that the target decrease is unlikely to be met on time. Perhaps some of this growth can be blamed on the government for discouraging the use of public transport during the pandemic. Will the target be met two years late? *The document does not deal adequately with the proposed DLR extension to Thamesmead, the Silvertown Tunnel or with Low Traffic Neighbourhoods*

Our Hon. Sec. had previous experience with a transport strategy at TfL between 2005 and 2007 as a member of a team assessing all 33 Boroughs' statutory draft and final Local Implementation Plans (LIPs) for compliance with the London Mayor's Transport Strategy (MTS).

He was specifically looking at the following aspects of the MTS: freight, regeneration, air quality, controlled parking, accessibility, town centres, streets for people and station access. Colleagues assessed the 33 LIPs for other aspects of the MTS.

Some LIPs were good, some bad and some indifferent.

Not all London-wide aspects would necessarily apply to Greenwich, and, with the climate crisis, priorities have changed but we would expect the Greenwich Transport Strategy (GTS) to address most aspects of the list assessed all those years ago and perhaps some more.

The draft GTS is hardly "SMART" (Specific, Measurable, Achievable, Relevant and Time bound) and needs to be much more so.

For example, it talks about "improving street lighting" but does not state how it will be decided which streets will be involved, how the need for any improvement will be determined, what form any improvements might take, how many streets or when.

Simply increasing the number of streetlights (other things being equal) would increase the consumption of energy in the Royal Borough, going against climate emergency objectives *Any new light fittings should incorporate shades for 'dark skies' policies.*

Working with other organisations is part of the process of implementing almost anything but repeatedly saying so in the draft GTS is meaningless and a waste of space. It needs to be mentioned only once at the beginning and perhaps a few times more.

Much of the draft GTS reads as if none of the many activities it lists have started! It gives the impression, perhaps mistakenly, that the Royal Borough has entirely ignored them until now. If the activities are already “work in progress” we need to know when and what stage has been achieved so far.

The draft GTS states “The Transport Strategy will sit below the wider Royal Greenwich Corporate Plan and the Carbon Neutral Plan...”. What proportion of readers is expected to understand those metaphorical uses of “sit” and “wider”? Should those other documents be cross-referenced with the GTS?

The draft GTS contains numerous mentions of “Action Plans” without specifying what they will contain.

Given how controversial Low Traffic Neighbourhoods (LTNs) are, we were surprised to find so little mention of them in the draft GTS. The impact of the West Greenwich LTN on Blackheath Hill and Maze Hill was significantly overstated by people who are otherwise well-informed. The GTS should contain much more information about LTNs, perhaps choosing a well-designed, less controversial example in the Royal Borough and detailing all its benefits (with before and after photos) so that all the facts are known and better understood throughout the Royal Borough.

The photos in the draft GTS are very attractive but it would be nice to know where each of them was taken.

However, one of the photographs appears to be encouraging “scooting”: an e-scooter experiment in Canterbury was recently terminated abruptly because of serious safety concerns <https://www.kentonline.co.uk/canterbury/news/e-scooters-to-vanish-from-kents-streets-273296/>

The draft GTS mentions e-scooters, but not safety, in paragraph 5.22. *The status of e scooters needs to be clarified and enforced nationally as well as locally.*

In Tables 4.2 and 7.1, the draft GTS gives as the first priority, “People with mobility issues (such as blue badge holders)”.

National good practice is as follows

1st priority active travellers with disabilities

2nd priority people with disabilities reliant on a vehicle.

Policy 2a mentions “making sure those vehicles that need to use London’s streets are as safe as possible” How is that to be achieved? How will the Royal Borough “hold those responsible for road crime to account”?

Regarding parking controls (and emissions-based charging), a massive “loophole” appears to be landowners demolishing their front garden walls, perhaps cutting down trees and then concreting over their former gardens (even in conservation areas) to park Up Close And Personal to their homes, when much smaller changes to a home (without disastrous environmental and aesthetic consequences) require planning permission! This has been going on since long before people had electric vehicles they want to charge at home.

What can be done in the Royal Borough to close off this loophole (at least to discourage more people from doing it)? Something equivalent to a workplace parking levy?

The draft GTS does not state how the Royal Borough is proposing to make the most of the Elizabeth Line stations, mitigate the impact of the Silvertown Tunnel (now under construction), the proposed Thames Barrier Bridge (for cycling and pedestrians) or how much it would welcome the DLR extension to Thamesmead if authorised.

The draft GTS and consultation questionnaire wrongly mention “Thames Clipper” services (now operated by Uber Boats) calling at local piers. Does the Royal Borough have a strategy for how these services might develop?

We found no mention of Angerstein rail-river Wharf.

We hope these comments are helpful

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