

## **Royal Borough of Greenwich Transport Strategy**

### **Response from Greenwich Green Party: September 2022**

Greenwich Green Party represents thousands of environmentally minded residents in Greenwich, winning 18,425 votes in the Royal Borough in the [2022 local elections](#).

We have for some years pressed Greenwich Council to publish a comprehensive Transport Strategy, focussed on reducing emissions. We are pleased to see that a Strategy has now been published for consultation. We have produced this document to provide detailed feedback, to inform the further development of the document.

This response starts with a series of cross-cutting recommendations, which would improve the whole Strategy if delivered, and then comments on each of the five core themes.

We would like to put on record our thanks to the officers and councillors who have worked hard to publish the document. Although we feel there are critical ways it could be improved, we acknowledge the step in the right direction that the Strategy represents.

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#### **A) Cross-cutting changes that would enhance the Transport Strategy:**

##### **a) The establishment of a hierarchy of objectives, with climate and air pollution/health at the top.**

The Transport Strategy is based around the delivery of five core themes, which are given equal billing in the document:

- 1) A healthier Greenwich
- 2) A safer Greenwich
- 3) A cleaner, greener Greenwich
- 4) Economic prosperity for all
- 5) A great place to be

There is no acknowledgement of the fact that themes 1, 2, 3 and 5 can all best be delivered by reducing the number of polluting motor vehicles, but that theme 4 is likely to feature a more favourable approach to motor vehicles, given the current role they play in the economic life of the Borough. It is highly likely that there will be times when the environmental considerations driving themes 1, 2, 3 and 5 will come into conflict

with the economic motivation of theme 4. A system of explicit prioritisation is required to manage such conflict.

Elsewhere, the Strategy creates an implicit matrix for prioritisation. The 'road user hierarchy' in table 4.2 suggests that the needs of different road users should be prioritised differently, with people with mobility issues, pedestrians and cyclists at the top and commuters using vehicles to travel through the area at the bottom. This is a sensible approach, which puts health, people and climate ahead of the car-dependent status quo.

We suggest that a similar prioritisation is adopted across the themes in the Strategy, with greatest weight placed on climate and health themes. It should be explicitly stated that economic prosperity should be pursued solely in ways that promote themes 1, 2, 3 and 5. Growth that goes against our climate goals and worsens health is not prosperity but a threat to the Borough and its residents.

This explicit prioritisation of climate and health would align the document overall with the road user hierarchy it contains. This would also resolve a potential contradiction on page 9, which states that the Transport Strategy will 'sit below...the Carbon Neutral Plan'. A Transport Strategy that puts equal weight on climate and economic goals, without defining the latter, is not equipped to effectively contribute to a Carbon Neutral Plan.

In the long run, economic prosperity can only be assured by addressing the climate and ecological emergency. In the words of the Treasury-commissioned [Dasgupta report on the economics of biodiversity](#) (2021) 'Continuing down our current path – where our demands on nature far exceed its capacity to supply – presents extreme risks and uncertainty for our economies.' There can be no economic prosperity on a dead planet. Any document that aspires to a long-term approach must ascribe a secondary, supporting status to economic motivations. The Transport Strategy should follow suit.

## **b) Set interim targets**

The Strategy makes a welcome re-commitment to the earlier promise (from the carbon neutral plan) to achieve a 45% reduction in car use in the Borough, along with a 10% decrease in van and truck use, both by 2030.

The 45% target is good and ambitious. We believe the 10% target for vans and trucks is too low and should be doubled, to encourage innovative forms of delivery. To meet the targets, significant action needs to be taken now. The Strategy rightly underlines the need for radical change. Leaving the bulk of the work to the end of the time period will lead to missed targets. To avoid this, the Transport Strategy should set interim targets, to encourage sustained ambitious delivery across the eight years between now and 2030. We suggest that a halfway point of early 2026 would provide an appropriate

point for interim targets to be set for the core 45% and 10/20% targets. This timing would also inform Greenwich voters of progress made, ahead of local elections in May 2026.

We also propose that the Strategy adopts a voluntary interim target for the application of the Mayor of London's Transport Strategy (MTS) target for 72% of the population to be within 400m of a strategic cycle network by 2040. The current figure in Greenwich stands at 25% and interim targets, perhaps for every four or five years running up to 2040, would help drive measures to fill the gap in Greenwich by 2040. This would see Greenwich pioneering a front-loaded and transparent approach to target implementation.

It is unclear how the data table on page 27, showing Greenwich traffic targets under the MTS for 2041, fits with Greenwich's 2030 traffic reduction targets. The MTS mileage and car ownership targets appear to barely show a decrease by 2041.

### **c) Commit to delivering low traffic neighbourhoods**

A range of studies, including in-depth analysis of schemes across London, shows that Low Traffic Neighbourhoods (LTNs) [act as a catalyst](#) for reducing car dependency, securing safer streets and lowering air pollution and carbon emissions. Assertions of inherent negative impacts have been [disproved](#), although care is also required to consult with communities and ensure effective scheme design.

Whilst the Transport Strategy expresses general support for the principle of LTNs (p16), the language and timescales used for delivery is concerning. Page 90, which sets delivery timescales for actions under the Strategy, fails to commit to actually deliver LTNs, instead committing only to 'identify areas which could benefit from them' and 'understand where' they 'could best be delivered', all the way up to 2030. This is in stark contrast to other actions, which have direct 'to deliver by 2030' commitments applied to them (see for example school streets, also on page 90).

The Council should re-write LTN sections of the Strategy, including delivery timeframes, to commit directly to creating new LTNs in the Borough by 2026. The climate and health themes in the Strategy will be impossible to deliver without front-loaded implementation of LTNs as effective tools to increase cyclist and pedestrian safety and to reduce car use, air pollution and emissions.

### **d) Finance; register of risks; Council structure and culture**

The Strategy should be honest about the risks posed by TfL's financial problems and Greenwich Council's own constraints caused by staffing, finance etc. As well as prioritising the objectives relating to climate and pollution (see above), the Strategy should assign priorities and broad costings to specific actions and groups of actions. It should show how budgets will reflect the change in direction, with the only roads

money going to essential repairs. The Strategy would benefit from including a high level risk register, to be used as a management tool throughout planning and implementation, outlining the main risks to strategy implementation and what will be done to mitigate them.

It might be worthwhile to look into the possibility of [raising investment monies through municipal bonds](#). [Here is a \(French\) example](#) of such bonds being used for green infrastructure.

Council structure, culture and expertise should be assessed as potential risks to Strategy implementation. Recent poor decisions especially on planning suggest that this is necessary if Greenwich is to achieve the huge modal shifts needed. The Strategy should propose an approach to this key issue. The need for large-scale change to Council culture around transport is illustrated by the following examples:

- Recent planning decisions have largely ignored TfL demands for spending on active travel and public transport infrastructure. E.g. new and planned developments in Thamesmead and Plumstead have car parking but very poor active travel connections including to the nearest railway stations; TfL proposals for joining up infrastructure around Woolwich Arsenal have been largely ignored.
- Dangerously car-friendly resurfacing in August of Vanbrugh Hill (Greenwich/Blackheath) which is steep and attracts dangerous driving, especially during morning rush hour when children are walking to John Roan School. Not only was the work unnecessary, but it has resulted in a much smoother surface which encourages speeding, and the speed bumps are so small that SUVs and vans/lorries are too wide to hit them. Who took the decision to do this, and why? That question could be asked of many smaller scale changes across Greenwich.
- At one of the public consultations on the Strategy, it emerged that two of the council representatives had arrived by car despite it being easily reachable by train from Woolwich. Neither seemed aware how shocking this was to members of the public present.

#### **e) Halt, or at the very least mitigate, the harms caused by the Silvertown Tunnel**

Following years of campaigning from Stop the Silvertown Tunnel, Extinction Rebellion, Greenwich Greens and thousands of concerned residents (including some Labour councillors), Greenwich Council in April 2022 resolved to oppose the Silvertown Tunnel on climate and health grounds. This was the right decision, given the induced traffic the Tunnel will bring to Greenwich, and the increased carbon emissions and health pollution that will come in its wake. The Tunnel will make it much harder for the Council to achieve the Transport Strategy's climate & health themes, because of the impact it will have on traffic volumes, and the opportunity costs of continuing this huge project.

Although decisions on the Tunnel lie with the Mayor, the Strategy needs to be far more honest about these impacts and should enumerate them fully, as opposed to the sole, neutral reference (p38). The Strategy should commit the Council to doing all in its power to (a) cancel the Tunnel and (b) mitigate the impacts should it fail to stop it, stating what measures are needed to enable Greenwich to meet its 2030 targets.

The Strategy notes (para 5.09) the concentration of pollution along the approach to the Blackwall Tunnel. There is a clear danger of Silvertown Tunnel creating new zones of high pollution. In particular, the Strategy should address the issue of repurposing the Tunnel (and/or Blackwall Tunnel) for active travel (especially cargo bikes, bikes and e-bikes which can otherwise not cross the river) and public transport, including a possible Docklands Light Railway extension.

#### **f) Working with local organisations**

The Strategy should have a section on working with local organisations, from Stop the Silvertown Tunnel to Greenwich Cyclists, both to make use of their expertise and to co-operate on shared goals, e.g. encourage people to switch to cycling.

### **B) Comments on each core theme in the Strategy:**

#### **1) A healthier Greenwich**

Air pollution is barely mentioned but should be one of the leading factors driving this theme. Obesity rates among children are cited but not the frankly terrifying research by [King's College London and others](#) that showed children's lungs in polluted areas of Greenwich and nearby boroughs are 5% smaller than the norm, putting them at risk of lifelong breathing disorders.

The poor quality data on air pollution is unfortunate. The Strategy appears to use data from 2016, and includes targets set for 2021, e.g. over 50% reduction in NO<sub>2</sub> by 2021, with no actual result recorded. We also question why the PM targets look less ambitious than the NO<sub>x</sub> targets. Is there an underlying assumption that PM-emitting EVs will replace petrol and diesel traffic, which would run contrary to the target of 45% reduction in car use? All pollution data should also be presented in a form that enables it to be compared with WHO limits (currently pollution figures in section 6 are in tonnes; WHO limits are measured in µg/m<sup>3</sup> to show concentrations.)

The Strategy should include a paragraph on what action to take to reduce pollution from cruise liners moored at Greenwich, a big source of air pollution.

#### **2) A safer Greenwich**

The Strategy rightly prioritises the safety of cyclists and pedestrians and shows that Greenwich has lower rates of those killed or seriously injured (KSI) than neighbouring

boroughs and London as a whole. The next chart shows that only 2% of people in Greenwich travel by bicycle. It would be helpful to compare bicycle use with other boroughs, to see if our lower KSI rates are due to lower bicycle use.

The ghost bikes marking where cyclists have been killed are mainly along the main Woolwich to Greenwich route and especially at the roundabout that feeds in traffic off the Blackwall Tunnel access and the route to Ikea. This area has no safe access for cyclists and needs a major redesign. The Strategy talks about identifying key areas for improvements but should name key areas including the most dangerous, with a commitment to designing alternative arrangements. With the Silvertown Tunnel adding to heavy traffic and so greater risk, the area where it begins and where it merges with other major routes should also be identified as a key area for safety design.

The Strategy mentions that the Council will consider reducing traffic speeds on all roads through Greenwich to 20mph. The plan should give a specific commitment to ensuring all streets will be brought down to 20 that are not one of three or four main thoroughfares through the borough.

Making streets safer at night for those more vulnerable with lighting and additional staff on site: again the Women's Safety Plan consultation work should have identified the areas of greatest risk and locations should be listed in the Strategy.

Further measures that would make it safer for Greenwich residents to cycle include:

- Properly joined-up cycle lanes, so that the good bits aren't shunned because potential cyclists are scared of the bad bits.
- Address the problem of car culture and the very worrying increase in aggression towards cyclists which is literally driving some off the road. Also aggressive campaigns against LTNs and their supporters. Driver behaviour is only mentioned briefly on p46 - it needs attention and resources.
- Measures to encourage modal shift from cars to bikes, see on theme 3 below.

It should also be flagged that the percentages in table 5.3 don't seem to add up in any obvious way.

### **3) A cleaner, greener Greenwich**

The targets in this theme need further work.

The CO2 target in figure 6.3 doesn't appear to show a trajectory to the council's target of net zero by 2030. Clearly a very ambitious interim target is needed here, along with a supporting carbon budget.

The target of 10% van/hgv use by 2030 is too low; we suggest it should be raised at least to 20%, with supporting measures e.g. on cargo bikes. This would help meet

carbon and pollution targets. Many such vehicles come from outside the Borough and benefit outside business interests.

It is clearly important to have access to the necessary data in order to monitor progress against targets. The data in the paper is in most cases several years old, as raised above. We would encourage the Council to put systems in place to ensure key data is available in a timely way.

Further measures that would encourage more cycling, and a modal shift away from cars, include:

- Hire scheme for cargo bikes and cargo e-bikes. Sticks as well as carrots to incentivise their use by businesses and tradespeople, to enable a fall in the number of goods vehicles. How about raising/lowering business rates depending on the type of transport used?
- Secure bicycle storage in existing blocks of council and other flats. Residents cite the lack of it as a big barrier to cycling.
- Secure cycle parking – lots of it – is urgently needed at many transport and shopping hubs, e.g. Woolwich Arsenal station, the Co-op in Trafalgar Road, Charlton shopping centre off Bugsbys Way (which has loads of car parking).
- Introduce further disincentives for driving. It's very good to see a commitment to working with TfL on road charging, which has to be one key solution. Further action must be taken – current residents' parking charges in CPZs are very low, not in any way reflecting the cost to society of car ownership. They need to be raised enough to become a serious consideration when people are weighing up the costs and benefits of car ownership. Parking charges should include the size and weight of the car, as well as its emissions; large SUV-style EVs are clogging up the streets. The Strategy talks about road user charging, which could help with this, but then gives the example of a workplace parking levy which is something else entirely.

The Strategy notes the importance of streets and spaces that help bring people together. There would be value in a specific reference, along with targets, to street planting and maintaining street trees, which make streets more pleasant places and help to absorb emissions. Tree-lined streets have been shown to slow cars down

#### **4) Economic prosperity for all**

As raised above, this theme fails to consider the appropriate balance between environmental and economic needs. A question worth asking, that isn't explicitly asked here, is 'What transformational transport policies will help meet (an increasing population of) people's needs while also reducing footprint?' That should be the goal of transport policy, not growth for its own sake.

We strongly support policy 4b to engage night-time businesses and improve street lighting across the borough to incentivise active travel.

## 5) A great place to be

The current lack of North>South public transport is detailed effectively in this section (figure 8.1). While this does indeed have a negative impact on Greenwich as a 'Great Place To Be', this issue is fundamental to meeting most of the aims set out in the Strategy and therefore should be a more prominent objective throughout.

This core theme could also be improved by:

- A stronger commitment to enforce car-free developments: Policy 5a will 'encourage car-free developments through planning obligations'. This needs to be stronger, with an enforcement of car-free developments (except disability access provisions) throughout the Borough.
- More consideration of access issues: Greenwich should aspire to be 'a great place to be' for all its residents. We would like to see reference to inclusion of disabled people in this section, with specific targets to improve travel across the Borough for disabled people and those with other access needs. Parking on pavements needs to be banned. Electric car chargers must be sited off both highways and pavements, as petrol stations are. The Council should invite disabled people/group representatives to be paid consultants for the Council to advise on accessibility of RBG action plans.
- Greater recognition of broader benefits of reduced traffic: We would like to see recognition of a broader truth in this section - that reducing traffic in itself will make Greenwich a better place to be. There are significant physical health benefits to reducing road traffic (reduced impact of air pollution, improved road safety, encouragement of active travel) and mental health benefits (reduced noise, improved community connection e.g. through play streets, plus better physical health contributing to better mental health).

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Greenwich Greens would be delighted to discuss this response in more detail and to engage further in the development of the Transport Strategy.

We can be contacted at [coordinator@greenwich.greenparty.org.uk](mailto:coordinator@greenwich.greenparty.org.uk)

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