



Bromley's Third Local Implementation Plan

Draft Consultation Report 2019



DRAFT

Contents

Background to the consultation	4
Online survey responses	8
Survey respondent data	9
Outcome 1 Responses and Comments	11
Outcome 2 Responses and Comments	14
Outcome 3 Responses and Comments	17
Outcome 4 Responses and Comments	20
Outcome 5 Responses and Comments	23
Outcome 6 Responses and Comments	27
Outcome 7 Responses and Comments	30
Outcome 8 & 9 Responses and Comments	33
Overall Comments	36
Online consultation survey (PDF format)	39
Response from Organisations	51
National Bodies	52
Transport Groups	55
Local Authorities	70
Political Stakeholders	86
Resident Associations and Groups	90
Other Organisations	119

Background to the consultation

The London Borough of Bromley consulted on its draft third Local Implementation Plan for transport (LIP3) between November 2018 and January 2019. The LIP sets out the Borough's approach to transport, including our ambition to improve road safety and reduce road danger, and investment priorities for both the next three years as well as in the longer term to 2041 at a more strategic level.

Bromley's LIP3 sets out how the Council will deliver and work with partners such as rail operators to deliver an efficient and high quality transport network that safely supports borough residents, visitors to the borough for work and leisure and the borough's economy. The LIP is a statutory document, required by the Greater London Authority Act 1999, which sets out how we intend to implement the Mayor's Transport Strategy (MTS) within the Borough.

Approvals process

Bromley's draft LIP3 was considered by the Environment Policy Development and Scrutiny Committee on 10th October 2018 who endorsed it and recommended that the Portfolio Holder for Environment permit public consultation to take place. The committee however requested a report on the consultation responses

The GLA Act 1999 places a duty on all boroughs, when preparing a LIP, to consult with the following organisations

- The relevant Commissioner or Commissioners of Police for the City of London and the Metropolis
- Transport for London
- Such organisations representing disabled people as the boroughs consider appropriate
- Other London boroughs whose area is, in the opinion of the council preparing the LIP, likely to be affected by the plan

Any other body or person required to be consulted by the direction of the Mayor. The Borough undertook a consultation exercise between 5th November 2018 and 13th January 2019. The draft LIP3 had a dedicated webpage on the Council's website (<https://www.bromley.gov.uk/localimplementationplan>) where it and all associated documents were available to be downloaded, along with details of how to respond to the consultation.

Response to the consultation was intended to be as straightforward as possible with a simple online survey, although there was the option to send more detailed comments by email or post should someone wish to.

Additionally, a total of 526 bodies were directly consulted, including the statutory consultees mentioned above. Representatives of all direct consultees were be written to either by post or email; drawing attention to the consultation, where it could

be found on the Borough's website, and the closing date, consultees were able to request a printed copy of the documents if they require them.

To generate as wide exposure as possible amongst the general public, the Borough published a press release which was shared on the Council's Facebook and Twitter accounts. This was reported in the News Shopper, Bromley Times and Bromley Borough News. Furthermore, information about the consultation was included in the Bromley Winter Newsletter which was emailed to around 50,000 residents who have provided their email addresses to the council for this purpose.

The direct consultees fall into a number of broad categories as follows:

Statutory consultee	Number consulted
TfL	1
Police	2
Disability groups	5
Local authorities	10
Non-statutory consultee	
Emergency services	3
National agencies	5
Transport groups and operators	29
Business groups	10
Community groups	22
Friends of Groups	37
Residents' groups and associations	194
Other groups	197

Other	11
-------	----

Responses received

Respondents were invited to submit responses via an online consultation using Survey Monkey. A total of 389 consultation responses were received through this method and the results are summarised in the section 2 of this report. Other survey responses were received via email to the Transport Strategy team or were forwarded by Councillors to officers on behalf of residents and organisations.

Analysis of responses

Results from the fixed response answer questions from the online survey have been analysed and presented as percentages in a chart, which shows the percentage of respondents who stated their level of support for a particular proposal on a five point scale from Strongly Disagree to Strongly Agree, a N/A option was also provided.

Additionally respondents were invited to submit additional comments in a free space box at the end of each set of fixed response questions about an Outcome of the LIP. These have been analysed by coding the responses by theme and a response is provided by the Borough to the overall theme. Respondents were also invited to submit overall comments about the LIP, these have also been coded with a response provided. The results not received via Survey Monkey from individuals have been quantified as part of the coding of comments made about the LIP overall but for reasons of accuracy are not included in the charts from Survey Monkey.

Responses from organisations are included in full at the end of the report.

Additionally the following organisations responded to the online consultation survey, however to avoid double counting their comments these have been coded with the rest of the online survey comments rather than being included verbatim with other organisation's responses.

Organisations who responded to the online survey
20' sPlenty for Us
BID
qqwe
Keston Village Residents' Association
Lichfields on behalf of London Biggin Hill Airport
Orpington Constituency Labour Party
BikeRegister
Petts Wood and District Residents Association
Alliance of British Drivers

TfL response

TfL has assessed the boroughs' draft LIP on behalf of the Mayor of London to ensure that the requirements set out in the guidance provided to boroughs have been met. LIPs that meet these LIP guidance requirements will be recommended for formal approval by the Mayor. If the Mayor does not consider that a LIP satisfies the requirements set out in this guidance, or if a LIP is not submitted, the Mayor may exercise his powers under section 147 of The GLA Act and require a new LIP to be prepared or prepare one on behalf of the borough.

At this draft stage TfL has submitted a number of comments to the Borough which it would like addressed or has sought clarifications on prior to submission of the finalised LIP that will go to the Mayor for approval in March 2019. In the case of Bromley's LIP3, it should be stressed that these changes are generally minor and do not change the broad approach of the draft LIP approved by the Environment PDS committee in October 2018.

Summary of Borough response to consultation

The Borough has considered the responses made by stakeholders to the consultation and overall it believes that there is a good level of support for the broad approach outlined within each of the LIP's 9 outcomes. Therefore, no major changes are required to the LIP; however a number of small changes have been made in response to comments made by stakeholders which clarify the Borough's position and proposals or add more detail to a particular proposal.

A number of stakeholders have made detailed comments about particular locations in the Borough. It has not possible to provide a full response to all of these very specific and detailed comments within this report, however these comments will be considered in more detail following the submission of the LIP as the annual programmes for delivery during LIP3 are developed.

The Borough has written to TfL to explain how it has addressed the comments raised in their response to the Borough of 7th December 2018.

Online Survey Responses

BROMLEY
Market Square

Widmore Road →
East Street →
West Street →
Bromley North ⇌
Intu Bromley →

↑ Magistrates' Court
London Road

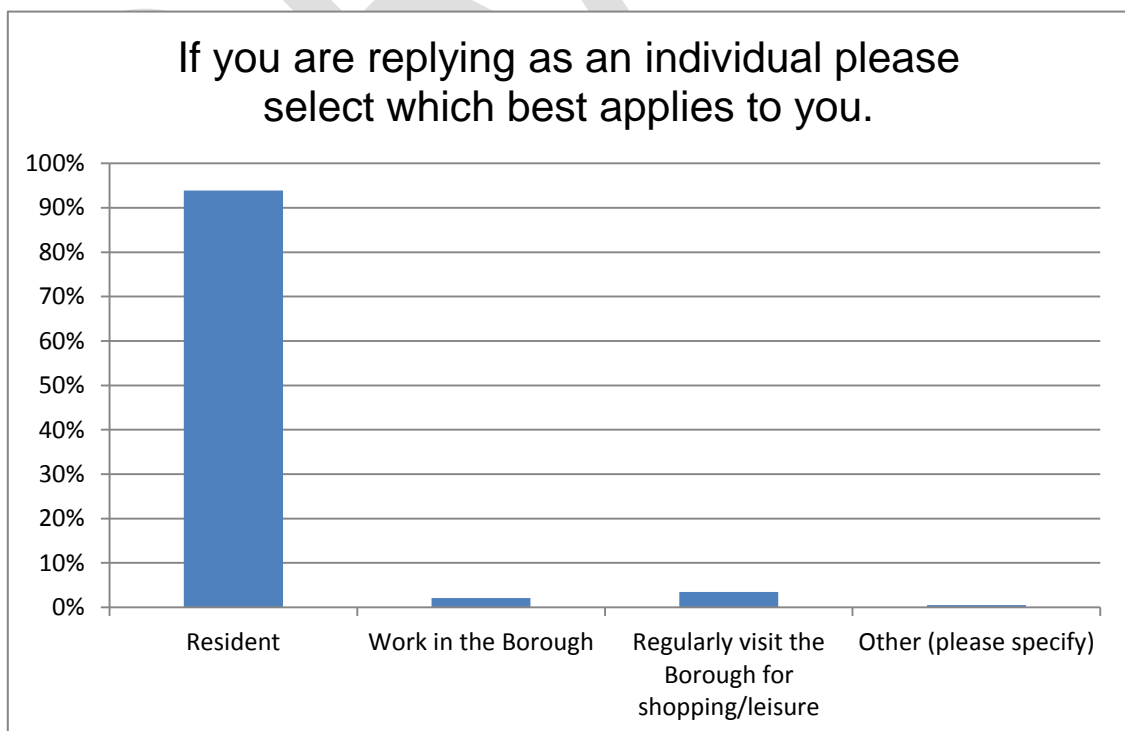
Walking from here

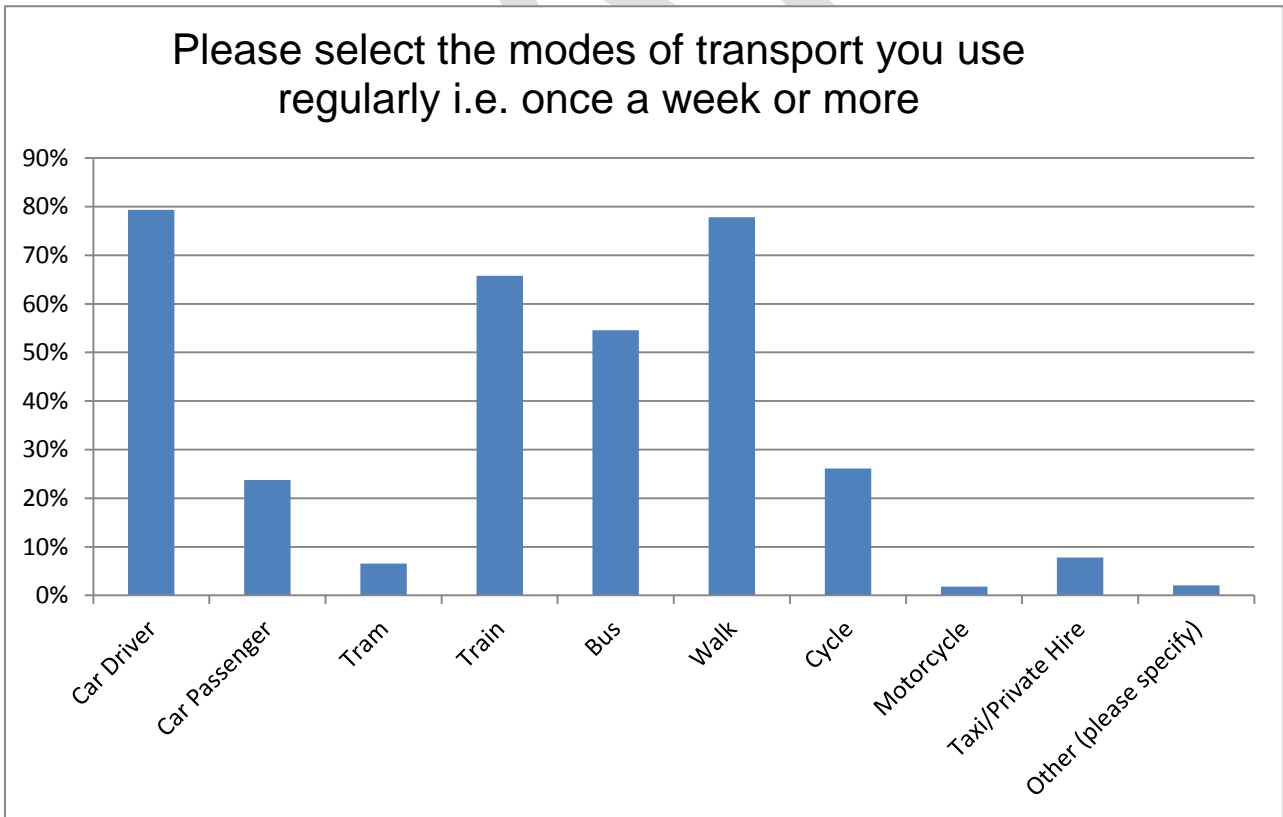
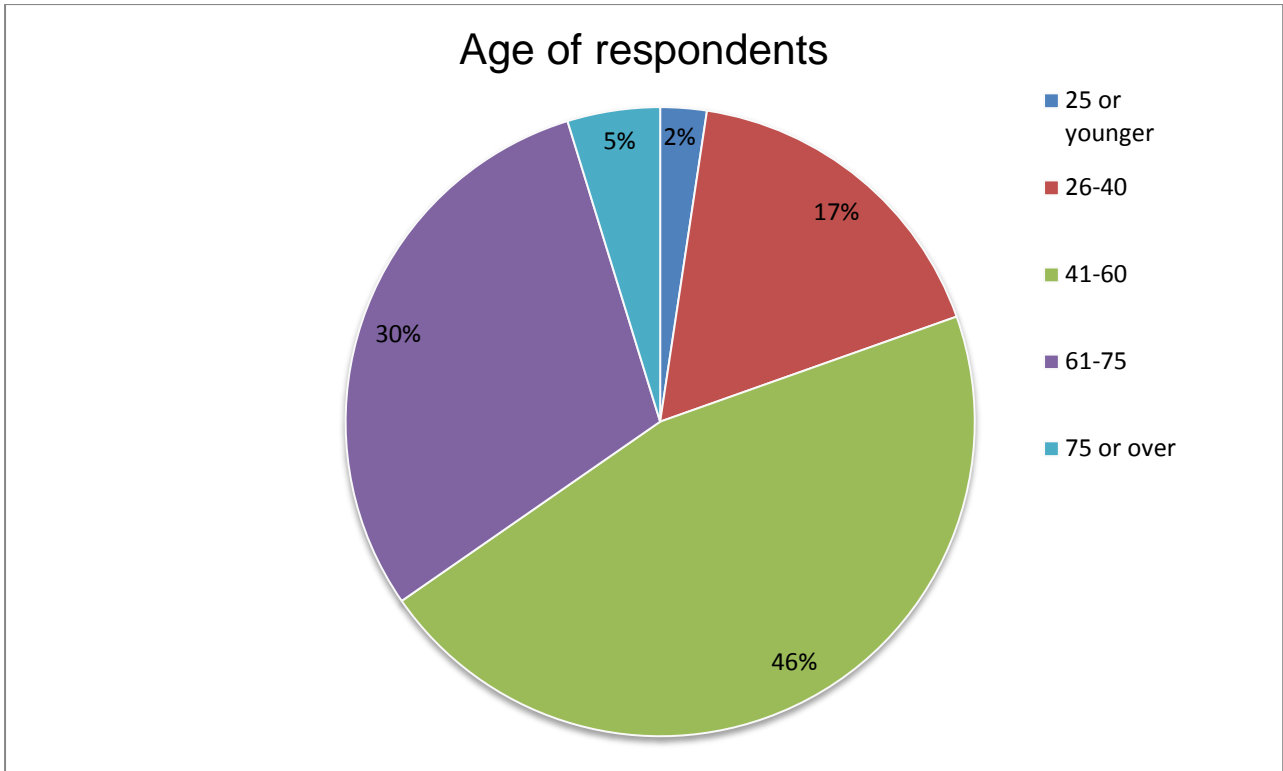
□ Bromley South	9 min
□ Shortlands	14 min
□ Sundridge Park	15 min
Bromley Police Station	9 min
Bromley Civic Centre	10 min
The Walcott Centre	17 min
BMI - The Stone Hospital	18 min

Transport for London



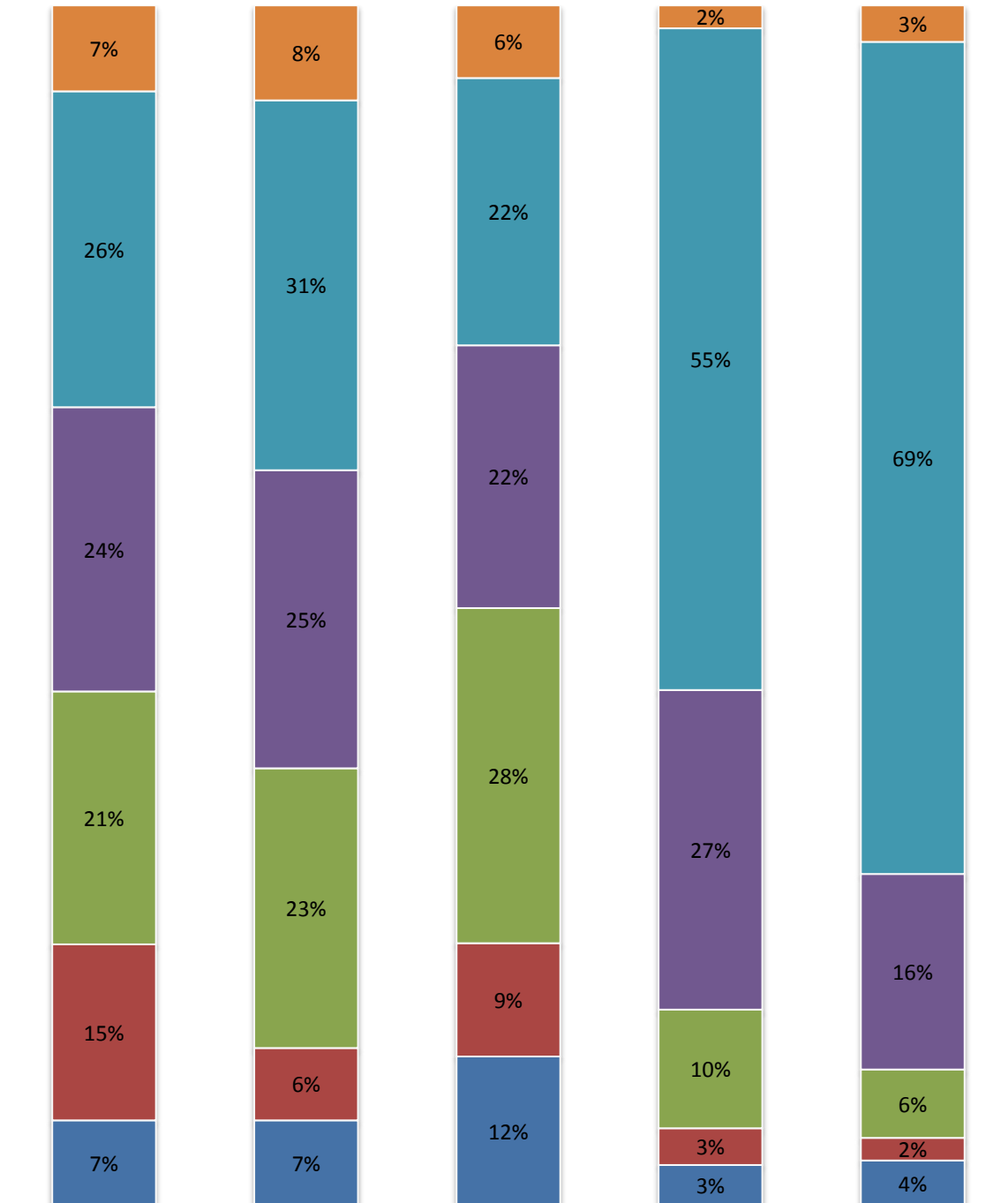
This section of the report covers the responses submitted via the online survey by both individuals and organisations Information about respondents. It provides a breakdown of the answers to the fixed response questions and provides analysis of the comments made by respondents about the proposals for each outcome.





Outcome 1

■ Strongly disagree
 ■ Somewhat disagree
 ■ Neutral
 ■ Somewhat agree
 ■ Strongly agree
 ■ N/A



Do you agree with the cycling corridors/routes and areas of cycling potential we have proposed?

Do you support our proposed approach to cycle parking?

Do you support our proposals for an electric bike share scheme?

Do you support our proposals to improve pedestrian crossings?

Do you support our proposals to encourage walking to school?

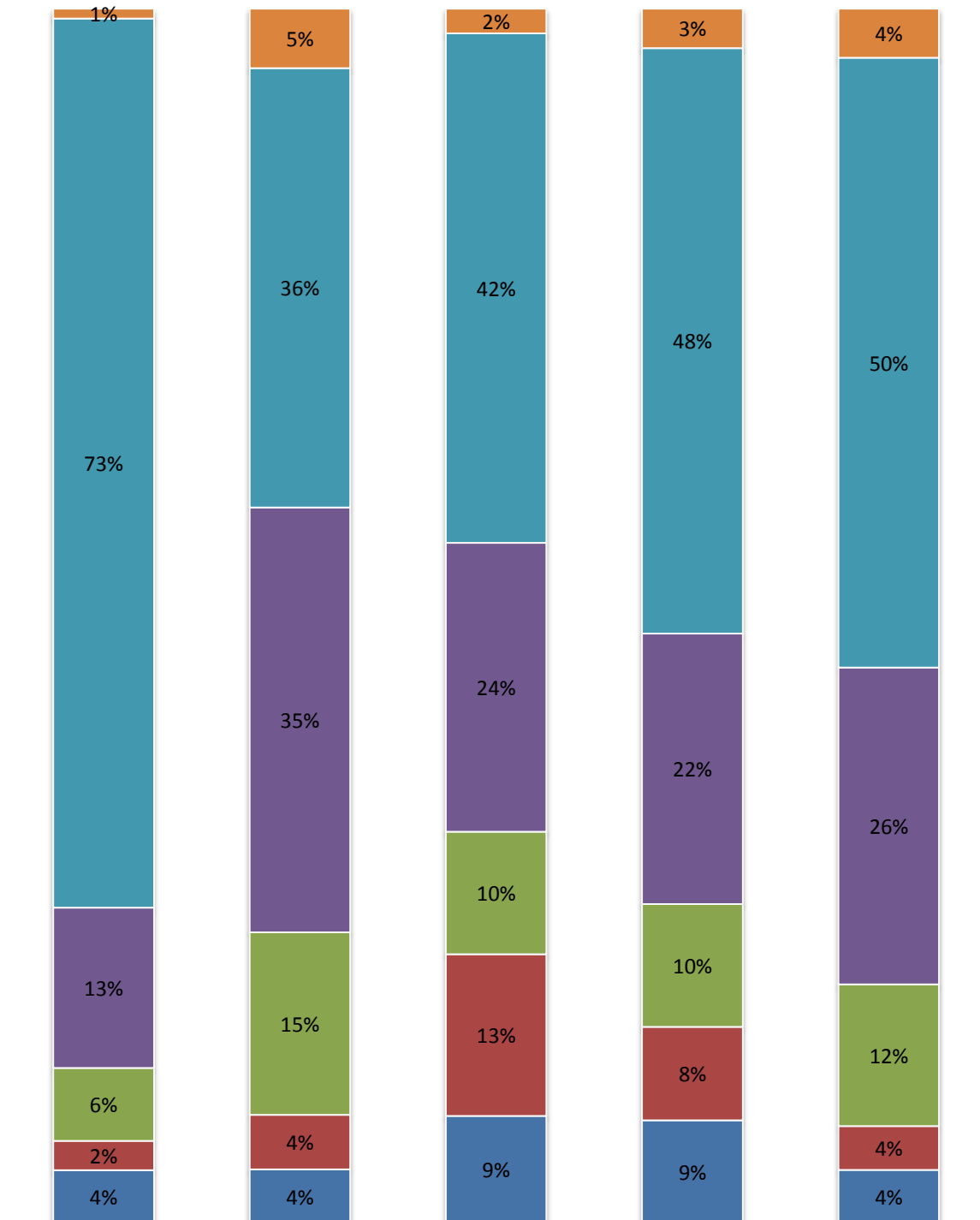
Outcome 1- Issues Raised

Outcome 1 Comments	Total	% of commenting respondents	Response to issues raised
Promote Walking/Cycling to School	29	35%	Promoting walking and cycling to school is a key Borough objective; therefore more details about the Borough's proposals have been added to the LIP.
Reduce Congestion Outside of Schools	19	23%	Promoting walking and cycling to school is a key Borough objective and will help reduce the number of pupils driven to school and congestion outside schools.
Safer Crossing Points for Pedestrians	19	23%	The Borough has set out its proposals to improve pedestrian crossings in the LIP, locations for these will be decided as the Lip programme develops over the three years of LIP3.
Concern for Cyclist Safety	31	38%	The Borough recognises that concerns about safety are a key reason for people not cycling. Therefore throughout outcome 1, proposals have been made to improve infrastructure for cycling, including the cycle network which will provide high-quality routes with improved safety for cyclists. Through the Action on Cluster Sites under Outcome 2 the Borough also proposed to improve junctions where there is a pattern of collisions involving cyclists.
Embrace E-bikes	7	9%	The Borough is proposing an e-bike hire scheme which received a good level of support in the fixed response question pertaining to e-bikes and therefore the Borough will proceed with implementation of this e-bike scheme.
Implement Cycling Routes & Quietways	24	29%	The Borough will work to deliver cycle routes including Quietways and has set out it's aspirational cycle networks for 2022 and 2041 in the LIP.

Segregated Cycling Lanes	25	30%	The Borough recognises the importance of high-quality infrastructure to promote greater uptake of cycling which segregated cycle lanes play a part in, the implementation of these will be decided on a case by case basis as the interventions for a scheme are developed.
Improve & Increase Cycle Parking	10	12%	The Borough intends to continue to deliver cycle parking at destinations, stations and in residential areas. A proposal to deliver lockable hubs in town centres has also been added to the LIP.
Education & Training for Cyclists	6	7%	Proposals for cycle training including Bikeability is covered in Outcome 3 of the LIP.
Public Transport Improvements	6	7%	Public transport improvements are proposed in Outcomes 5,6 and 7 of the LIP
Improve Air Quality	7	9%	Proposals to improve Air Quality are covered directly in Outcome 4 of the LIP.
Reduce Cycling Infrastructure	9	11%	High-quality cycle infrastructure is required to accommodate the anticipated growth in trips over the next two decades, which if all made by car would lead to worsening congestion. Therefore reducing cycle infrastructure would undermine this approach.
Avoid Anti-Car Measures	9	11%	The Borough's approach is to deliver infrastructure that allows people to make a choice about how they travel. These measures are intended to make efficient use of the Borough's limited highway capacity.
Consideration for Multi-Modal Journeys	9	11%	Proposals for multimodal interchange, including improving access to rail are outlined in Outcome 5 of the LIP.

Outcome 2

■ Strongly disagree ■ Somewhat disagree ■ Neutral ■ Somewhat agree ■ Strongly agree ■ N/A



Do you support the Borough's aspiration to eliminate deaths and serious injuries on the roads by 2041?

Do you support the Borough's approach to targeting cluster sites to improve road safety?

Do you support our proposed approach to promoting safe and appropriate speeds?

Do you support the proposals to reduce rat running through local neighbourhood schemes?

Do you agree with our approach to road safety education?

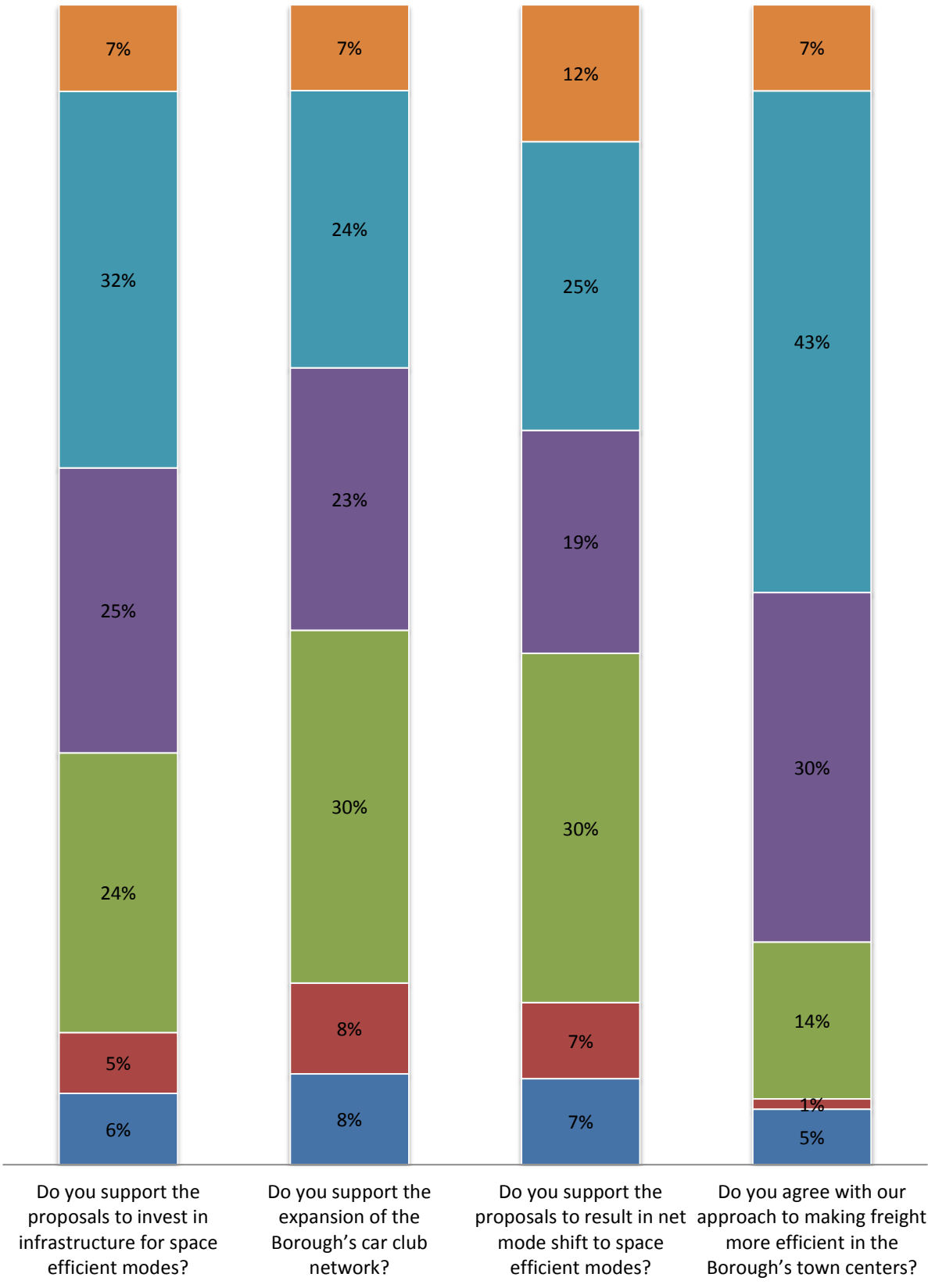
Outcome 2 - Issues Raised

Outcome 2 Comments	Total	% of commenting respondents	Response to issues raised
2041 Target Too Long Term	12	14%	This is already a challenging target and the Borough does not believe that with limited resources an earlier target is achievable. The reduction in KSIs relies on a number of factors which are not in the Borough's control and will be developed in the later years of the LIP's planning horizon to 2041. The 2041 target is also in conformity with the MTS.
Implement Low Traffic Neighbourhoods	15	17%	Greater detail about the proposals for Local Neighbourhood schemes have been added to Outcome 1 and 2 of the LIP to set out the Borough's proposals more clearly in this area.
Pro 20MPH Zones	14	16%	The Borough recognises that there are a wide range of views on 20mph limits and zones, however, in the light of recent DfT research it believes that it's targeted approach, as set out in the LIP, is likely to have the greatest impact on speeds where it is most needed.. The Borough stands by its approach of not adopting area wide 20mph limits.
Anti 20MPH Zones	14	16%	The Borough recognises that there are a wide range of views on 20mph limits and zones however believes that there is an appropriate place for their implementation particularly in the areas of greatest risk to pedestrians and cyclists. Therefore the Borough does not think it would be appropriate to change its approach set out in the LIP.
Reduce Traffic on Local Streets (Rat Runs)	29	33%	Measures will be considered on a case by case basis generally as part of larger schemes which do not simply create negative reassignment impacts.
Reduce Vehicle Speeds	25	28%	The Borough has set out its proposals to reduce speeds in the LIP and believes these to be proportionate. Individual interventions will be decided on a case by case basis.

Install Traffic Calming Measures	12	14%	The Borough has considered the merits of various traffic calming measures and favours an urban design approach to reducing speed and creating streets where drivers understand why they are being asked to drive slowly. The Borough will consider vertical deflection in cases where they can address KSI hotspots but not as typical speed management measures due to the impact on emergency vehicles, buses and the air quality impacts of significant stretches of vertical deflection.
Increase Enforcement	19	22%	Moving traffic violations is a matter for the Metropolitan Police, which the Borough supports. . References to the Borough's work with the police such as Operation Close Pass have been added to Outcome 2 of the LIP.
Act Before KSI Occurs	8	9%	The Borough understands residents' concerns about road danger as opposed to addressing casualties. , However, with limited resources the Borough also has to prioritise competing demands and therefore cannot treat every location where there is the perception of a safety issue over those that have a pattern of collisions resulting in injuries. Through new measures such as the Local Neighbourhood schemes proposed in the LIP, alongside measures to treat KSI hot spots, the Borough believes that it has balanced investment in casualty reduction and road danger reduction.
Driver Education	10	11%	The Borough has limited resources and believes that its approach to targeting driver education on the groups most at risk is the correct stance.
Reduce Car Use/Ownership	6	7%	Through the proposals outlined throughout the LIP to provide high-quality and attractive infrastructure for walking, cycling and public transport the Borough believes that it is offering choice to residents to enable them to opt for modes other than the car.

Outcome 3

■ Strongly disagree
 ■ Somewhat disagree
 ■ Neutral
 ■ Somewhat agree
 ■ Strongly agree
 ■ N/A



Outcome 3 - Issues Raised

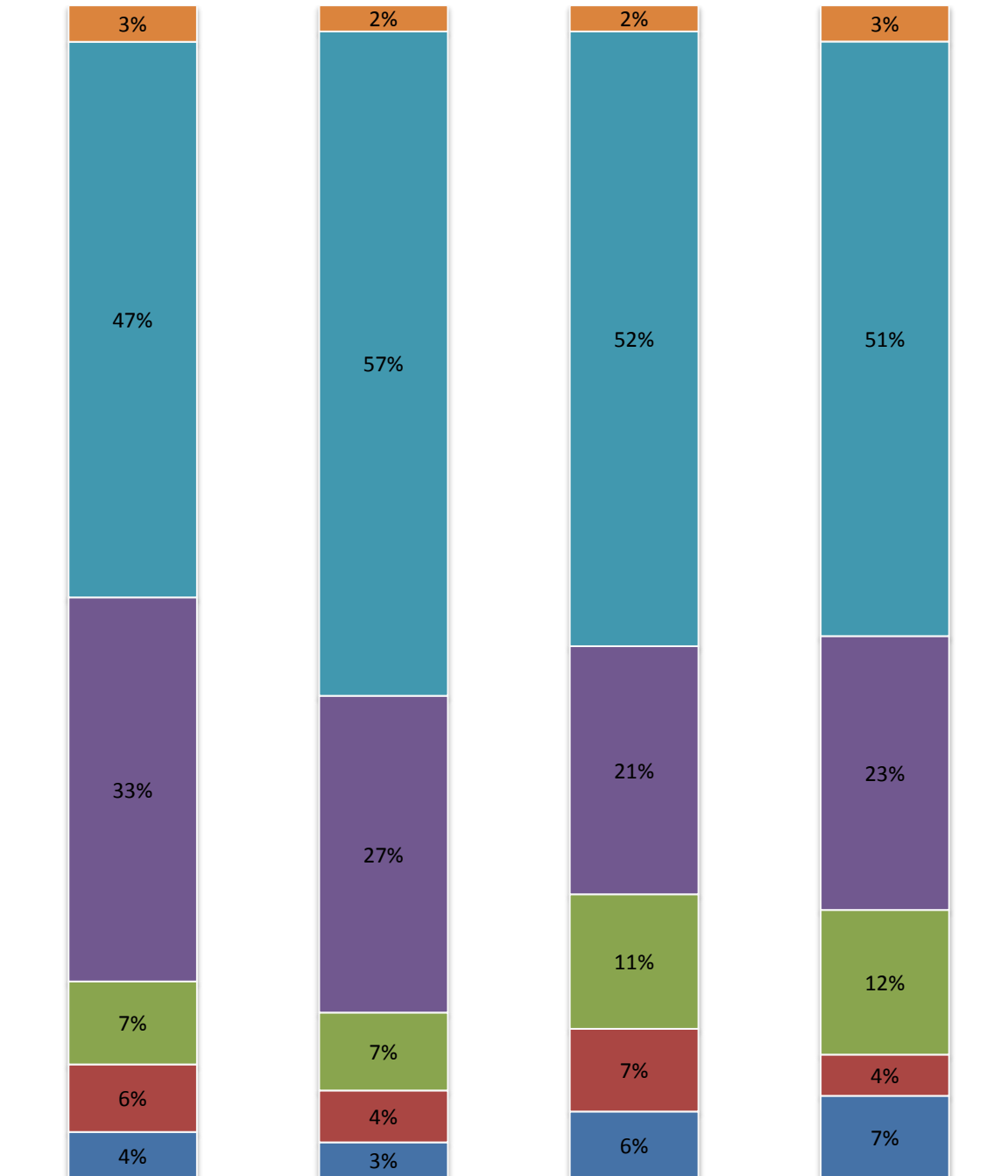
Outcome 3 Comments	Total	% of commenting respondents	Response to issues raised
Introduce Tougher Targets	12	21%	The Borough believes that the targets it has set are sufficiently challenging with the resources available and have been revised to reflect the backcast data provided by TfL and TRL.
Increase Road Space for Smarter Travel	15	26%	The Borough's proposals for walking and cycling are set out in Outcome 1
Greater Smarter Travel Investment & Promotion	19	33%	The Borough's proposals for walking and cycling are set out in Outcome 1
Restrictions on Freight/Delivery Vehicles	13	23%	The Borough's proposals for reducing the impact of freight and logistics on the highway network and environment, whilst ensuring that it remains efficient, are set out in Outcome 4
Promote Car, E-Bike, Cargo Bike 'Clubs'	8	14%	The Borough's proposals for shared bike hire schemes are set out in Outcome 1 and proposals for car clubs and cargo bikes are set out in Outcome 4.
Actively Aim to Reduce Car Use/Ownership	13	23%	Proposals for providing alternatives to car ownership and use are set out throughout the LIP. Reducing car use from new developments is detailed in Outcomes 8 and 9.
Avoid Targeting Private Vehicle Use	5	9%	The Borough has to balance many competing demands for road space. The approach is to deliver infrastructure that allows people to make a choice about how they travel. These measures are intended to make efficient use of the Borough's limited highway capacity.
Improve/Extend Public Transport	4	7%	The Borough's proposals for improving public transport are set out in Outcomes 5, 6 and 7

Reduce Parking Allowance/Capacity	9	16%	The Borough has to balance many competing demands for kerb space and has set out proposals to develop parking controls to manage the supply of parking in Outcome 4. Parking standards at new developments are detailed in Outcome 8.
Avoid Smoothing Traffic Flow	3	5%	The Borough has set out proposals to deliver mode shift to space efficient modes throughout the LIP. This includes improving bus reliability and, for those locations where measures cannot be provided, improvements to traffic flow. The wording around this has been clarified in Outcome 7 and in The Delivery Plan section of the LIP.

DRAFT

Outcome 4

■ Strongly disagree ■ Somewhat disagree ■ Neutral ■ Somewhat agree ■ Strongly agree ■ N/A



Do you support the Borough's targeted approach to improving Air Quality?

Do you support proposals to 'green' the borough's fleet and infrastructure?

Do you agree with our proposals to tackle unnecessary vehicle idling?

Do you support the proposals to increase the availability of electric vehicle charging infrastructure in the Borough, including proposals to deliver fast/rapid electric vehicle infrastructure for Taxis?

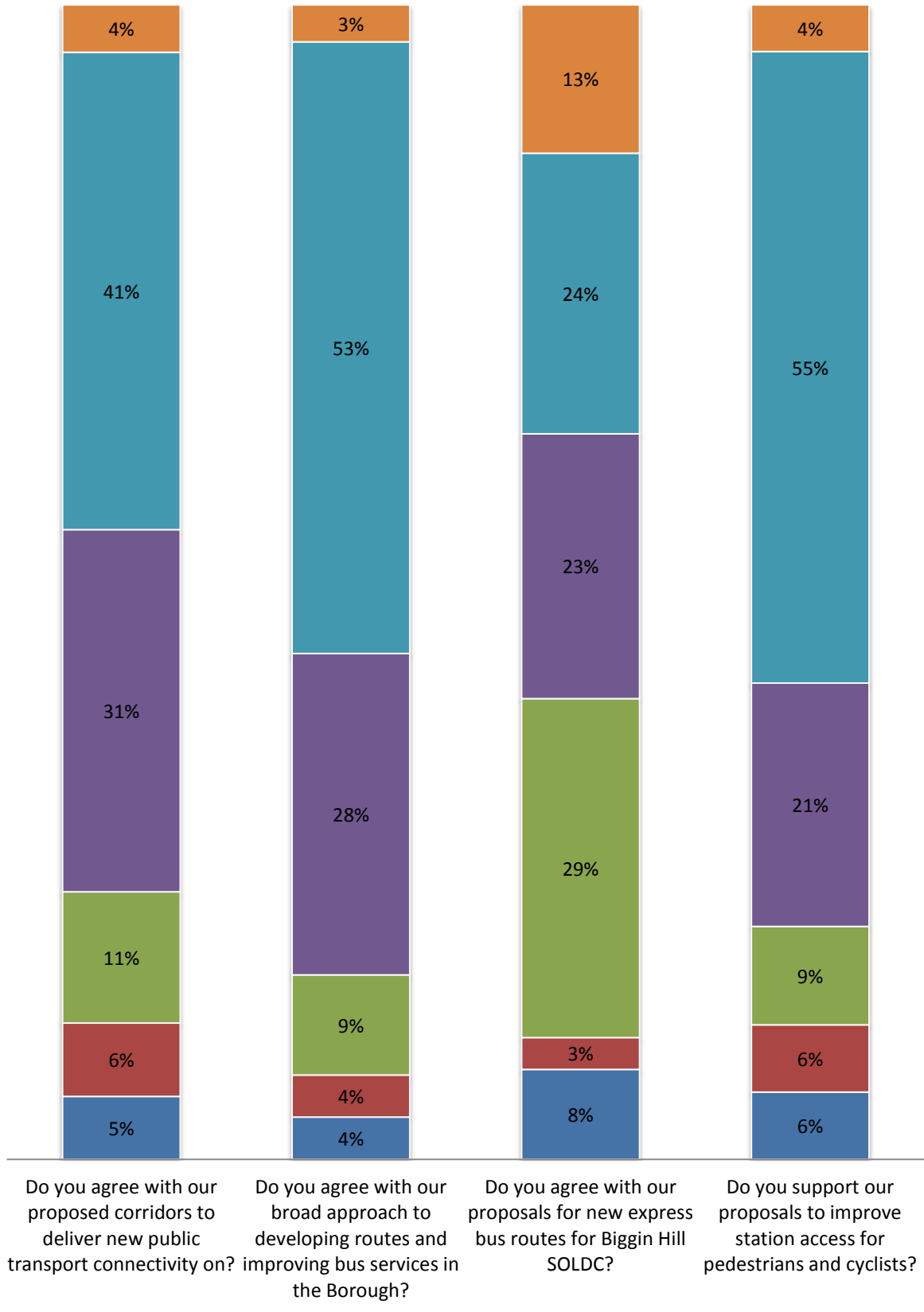
Outcome 4 - Issues Raised

Outcome 4 Comments	Total	% of commenting respondents	Response to issues raised
Improving Air Quality is Vital	16	28%	These views are noted.
Greater Monitoring of Air Quality	6	11%	Proposals for this will be developed as part of the Borough's Air Quality Action Plan
Tougher Targets	7	12%	The targets the Borough is adopting have been set at a London wide level for each Borough and are thought to be realistic yet challenging. The Local Objectives are intended to contribute towards this and are thought to be challenging with the resources available during LIP3 as set out in the delivery plan.
Target Idling Buses/Taxis and Schools	14	25%	The Borough has updated its proposals to tackle idling vehicles in the final LIP.
Target Polluting LBB Vehicles	6	11%	The Borough has set out how it proposes to reduce emissions from its vehicles in the Road map to reducing emissions, this was devised to take account of development in specialist vehicle alternative fuel technology and the Council's commissioning cycle.
More infrastructure and promotion of Electric Vehicles	7	12%	The Borough will continue to deliver a range of electric vehicle charging infrastructure.
Be wary of Charging Points causing Clutter/Nuisance	7	12%	The Borough will consider the need to maintain adequate footway widths as proposals for electric vehicle charge points are bought forward.

Electric Vehicles Not Viable/Practical	14	25%	The Borough will continue to deliver a range of electric vehicle charging infrastructure to make electric vehicles a more viable choice. .
Increase Green Spaces	4	7%	Through the projects outlined in The Delivery Plan of the LIP, the Borough will seek to deliver new green infrastructure.
Higher Parking Charges for Polluting Vehicles	1	2%	The Borough does not consider this to be an effective use of limited resources to reduce emissions given other London wide emissions based charging mechanisms.
Consider Other Pollutants (air, electric power sources)	6	11%	Proposals for this will be developed as part of the Borough's Air Quality Action Plan
Targeting Idling is not Achievable/Practical	5	9%	The Borough believes that tackling idling is a necessary aspect of reducing emissions in the short term with minimal investment and changes required. It has therefore revised its proposals in the final LIP to reflect the Borough's participation in the MAQF anti-idling project.

Outcome 5

■ Strongly disagree
 ■ Somewhat disagree
 ■ Neutral
 ■ Somewhat agree
 ■ Strongly agree
 ■ N/A



Outcome 5- Issues Raised

Outcome 5 Comments	Total	% of commenting respondents	Response to issues raised
Additional and More Frequent Bus Routes	18	26%	The Borough intends to work with TfL to develop plans to improve the connectivity of the Bus network and these plans are set out in Outcome 5
Improve Cycle Routes to Stations	21	30%	Proposals to improve station access by cycling are set out in Outcome 5 of the LIP
Improve Cycling Facilities at Stations	9	13%	Proposals to improve station cycle parking are set out in Outcome 5 of the LIP
Additional Access Points to Bromley South	4	6%	The Borough has set out its strong support for passenger capacity enhancements at Bromley South in Outcome 5
Greater Rail Connectivity to Docklands/DLR	6	9%	This is a key priority for the Borough as set out in Outcome 5.
Better Pedestrian Access to Stations	18	26%	Additional proposals to improve walking to stations have been added to the 'Station Access' section of Outcome 5.
In Favour of Tram Extension	4	6%	The Borough has set out its priority corridors for new public transport connectivity in Outcome 5 and at this stage does not want to commit to a particular mode before feasibility and high level assessments of value for money have been made for public transport improvements on these corridors.

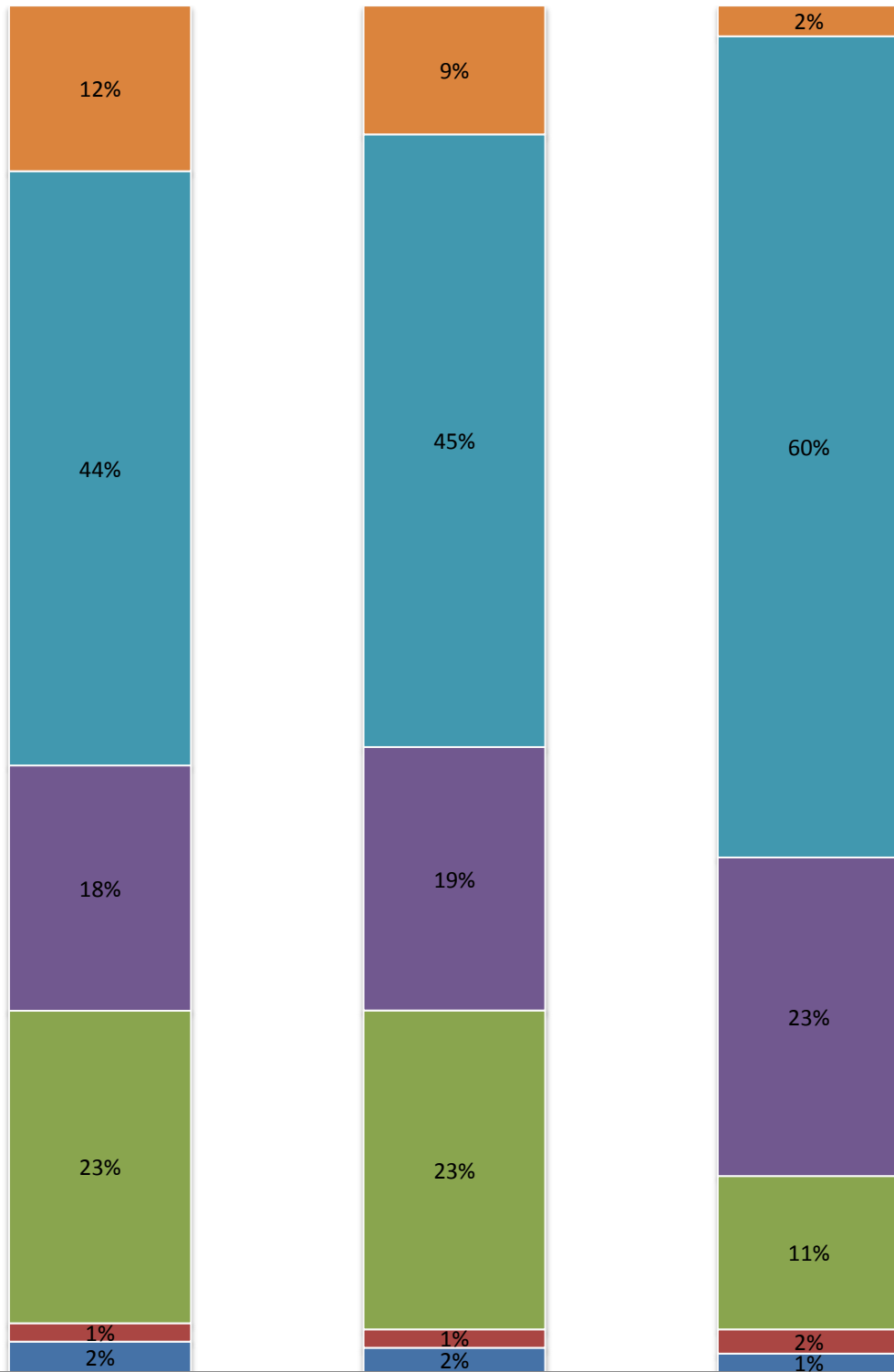
Against Tram Extension	2	3%	The Borough has set out its priority corridors for new public transport connectivity in Outcome 5 and at this stage does not want to commit to a particular mode before feasibility and high level assessments of value for money have been made for public transport improvements on these corridors.
Greater Focus on Crystal Palace	3	4%	Improved connectivity with Crystal Palace is identified as a corridor for improved public transport in the LIP.
Reduce Emphasis on Buses	8	11%	The bus network has a key role in facilitating trips around the Borough and reduce the number of cars on the roads and congestion. It is also easily adaptable so can more easily cater for demand in the short to medium term than rail can. It is therefore important to make improvements to buses as well as rail.
Reduce Station Car Parking	2	3%	The Borough has set out its approach to managing parking on the streets around stations in Outcome 4 of the LIP. Parking at stations is however a matter for the railway operator.
Increase Station Car Parking	2	3%	The Borough has set out its approach to managing parking on the streets around stations in Outcome 4 of the LIP. Parking at stations is however a matter for the railway operator.
Direct Bromley North Trains to London	2	3%	Outcome 5 of the Borough's LIP identifies improvements to connectivity between Bromley Town Centre and Canary wharf. , However the exact proposals and destination of a future service needs to be developed with TfL and Network Rail.

Extension of Bakerloo Line	2	3%	Outcome 5 of the Borough's LIP sets out the Borough's position with regards to supporting the Bakerloo Line Extension into the Borough.
Better PT Links to Croydon	3	4%	Outcome 5 of the Borough's LIP identifies improvements to Orbital travel as a key priority, which improved connectivity with Croydon falls under.

DRAFT

Outcome 6

■ Strongly disagree
 ■ Somewhat disagree
 ■ Neutral
 ■ Somewhat agree
 ■ Strongly agree
 ■ N/A



Do you support our proposals to lobby to make Penge West step-free?

Do you support our proposals to lobby to make either Chislehurst or Elmstead Woods station step-free?

Do you support our proposals to make bus travel more accessible?

Outcome 6- Issues Raised

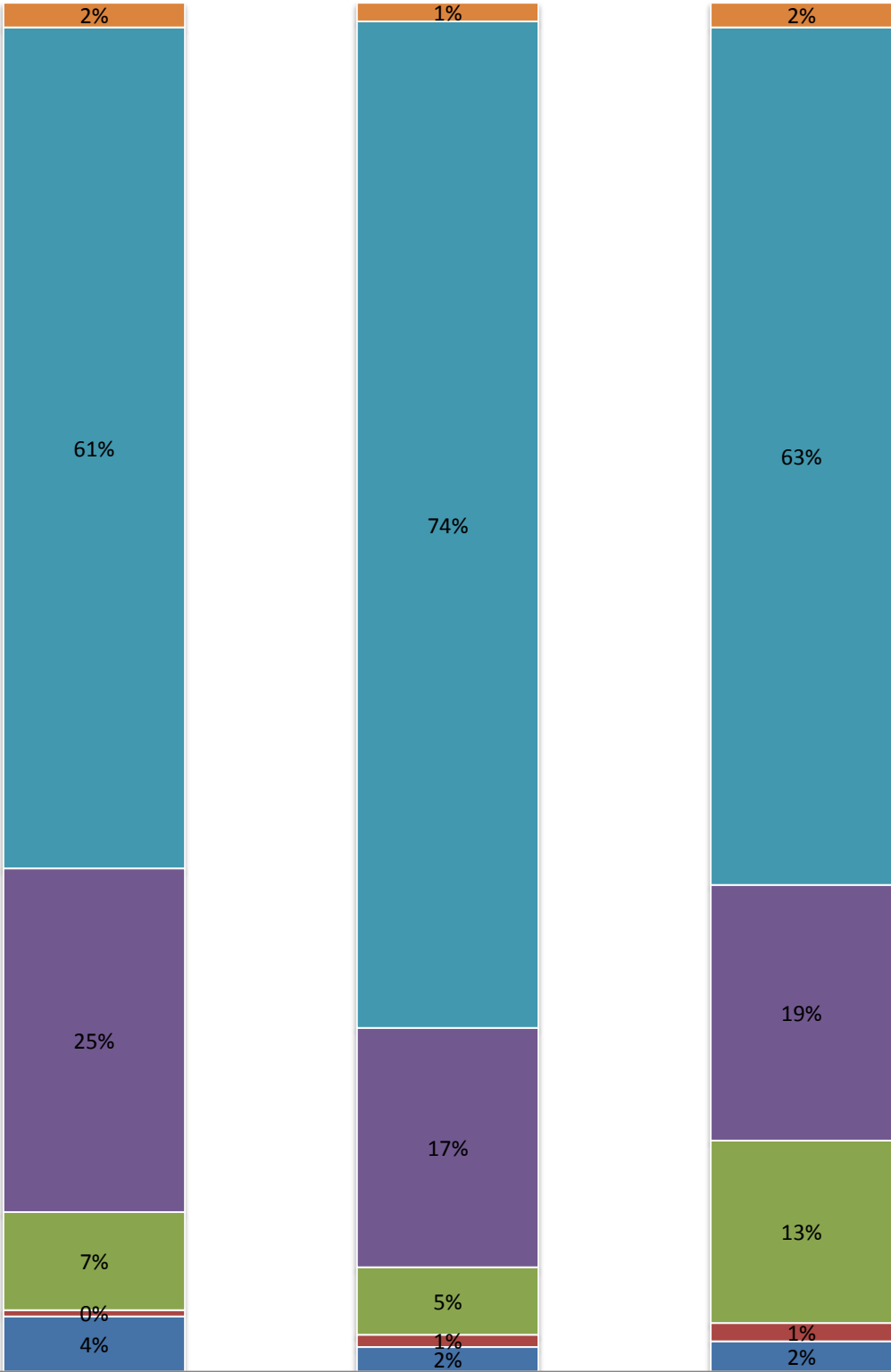
Outcome 6 Comments	Total	% of commenting respondents	Response to issues raised
Stations to be Step Free	17	43%	The Borough has set out its priorities for step-free station investment in Outcome 6 of the LIP.
Bus Stop Access/Seating for the Disabled	5	13%	The Borough's approach to bus accessibility has been further detailed in the final LIP. Specific proposals regarding seating will be developed as part of the schemes.
Further Consultation with Relevant Groups	2	5%	The Borough will engage with stakeholders who are directly affected by schemes on a scheme by scheme basis and the level of consultation will be based on the scale of the scheme and its likely impacts.
Allowance for Adapted Bicycles	1	3%	The Borough will consider this as part of its proposal for cycle parking at stations and wording in the LIP has been added to reflect this.
Improvements to Bus Frequency/Info	4	10%	This is a matter for TfL however the Borough will lobby for improvements to bus services throughout the Borough.
Specific Focus on Wheelchairs	1	3%	The Borough has set out its approach to improving bus and rail accessibility in Outcome 6. The approach to bus accessibility has been further detailed in the final LIP.
Reduce Emphasis on Step Free Access	5	13%	Provision of step free travel is an important part of ensuring that residents can live an independent life in accordance with the Building a Better Bromley objective of maintaining independence.
Trail mobility as a Service	1	3%	Mobility as a service is a concept beyond the scope of this LIP because the Borough does not operate transport services.
Disparity between rail and TfL zonal fares needs to change	1	3%	This is not a matter that the Borough has control over.

Support Trail devolution to TfL	1	3%	The Borough notes the success of the London Overground although has focused its aspirations in the LIP on corridors rather than making comment on who delivers the service which is outside of its control.
Focus on Crystal Palace	1	3%	The Borough has included its aspiration for improvements to public transport to Crystal Palace in outcome 5 of the LIP.
Smaller Buses	1	3%	The size and type of vehicles deployed on a particular bus route is a matter for TfL.

DRAFT

Outcome 7

■ Strongly disagree
 ■ Somewhat disagree
 ■ Neutral
 ■ Somewhat agree
 ■ Strongly agree
 ■ N/A



Do you support our proposals to improve the reliability of bus routes in the Borough?

Do you support the Borough's proposals to lobby for a more reliable railway?

Do you support the Borough's proposals to lobby for increased weekend rail frequencies?

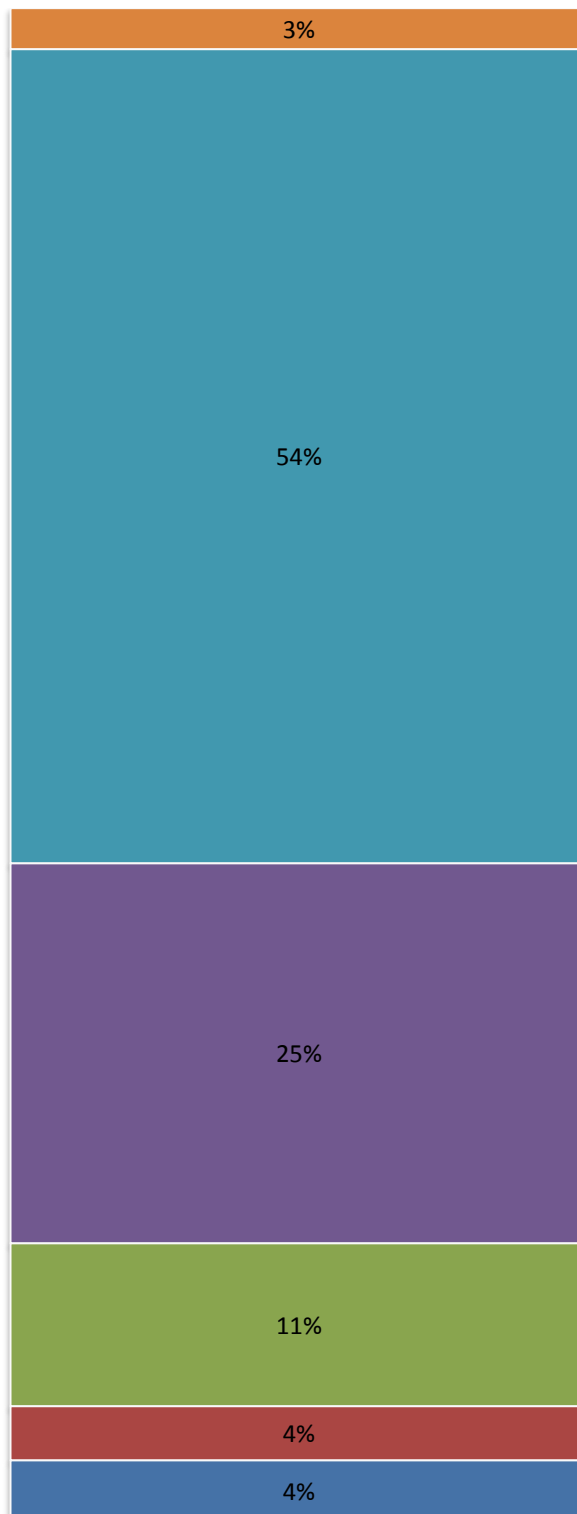
Outcome 7- Issues Raised

Outcome 7 Comments	Total	% of commenting respondents	Response to issues raised
Increased Train Frequency/More Fast Trains	11	28%	The Borough has set out its aspirations for high frequency metro services and greater capacity on fast services to Central London
Lower Cost of Public Transport	6	15%	This is a matter for the DfT, TfL and TOCs not the Borough
Improve Bus Reliability/Timetabling	10	25%	The Borough has set out its proposals to improve the reliability of the bus network by tackling congestion hot spots in Outcome 7 of the LIP and has added further details to the final LIP.
Lobby for TfL to Manage Rail Network	2	5%	The Borough notes the success of the London Overground although has focused its aspirations in the LIP on corridors rather than making comment on who delivers the service which is outside of its control.
Improve Bus Lanes/Highways	4	10%	The Borough has set out its proposals to improve the reliability of the bus network through improvements to reliability hot spots in Outcome 7 of the LIP and has added further details to the final LIP.
Reduce Bus Lanes and Operational Times	3	8%	The bus network has a key role in facilitating trips around the Borough and reduce the number of cars on the roads and congestion. Therefore providing bus lanes that improve bus journey time reliability are important for making this mode attractive for users and encouraging people to switch from car use.
Maintain Rail Service at Weekends	2	5%	This is a matter for the DfT, TfL and TOCs not the Borough although the Borough lobbies these partners to deliver the Borough's strategic rail priorities set out in the LIP.

Target Use & Ownership of Private Vehicles	6	15%	Proposals for providing alternatives to car ownership and use are set out throughout the LIP. Reducing car use from new developments is detained in Outcomes 8 and 9.
Public Transport is unpleasant and inconvenient	1	3%	The Borough strongly supports measures to improve public transport to make it a more attractive and viable choice to car use.
Pro Bakerloo Line Extension	4	10%	Outcome 5 of the Borough's LIP sets out the Borough's position with regards to supporting the Bakerloo Line.
Better Access to DLR/Docklands	2	5%	Improved access to Canary Wharf is one of the key public transport connectivity improvements set out in Outcome 5 of the LIP.
No Need to Lobby for Rail Improvements	2	5%	The Borough has a n important role as a key stakeholder to lobby on behalf of residents to achieve the outcomes set out in the LIP especially in relation to key strategic projects where multiple agencies and teams within the Council are involved. .
More Staff at Stations	1	3%	This is a matter for the DfT, TfL and TOCs.

Outcomes 8 & 9

■ Strongly disagree ■ Somewhat disagree ■ Neutral ■ Somewhat agree ■ Strongly Agree ■ N/A



Do you agree with our approach to reducing the impact of new development through improved infrastructure for walking, cycling and public transport?

Outcomes 8 & 9 Issues Raised

Outcomes 8 & 9 Comments	Total	% of commenting respondents	Response to issues raised
Involve Local Community Early On	2	8%	It is the Councils intention, as reflected in the SCI (Statement of Community Involvement) to consult neighbours/communities as part of the planning process.
Aim to Reduce Car Use	5	19%	Sustainably located development and good quality infrastructure encourages walking, cycling and use of public transport.
Consider Car Free Schools	1	4%	In line with the London Plan Bromley requires transport assessments for school development to determine the appropriate level of parking.
New Developments to Have Off Street Parking	5	19%	The Bromley Local Plan requests minimum levels of parking in order to ensure developments do not generate additional intrusive or obstructive on-street parking as a result of inadequate on-site provision.
Active Travel Focus on New Developments	11	42%	Planning objectives seek to encourage patterns of development that reduce the need to travel, reducing road congestion wherever possible and encouraging walking and cycling.
Equal Consideration for Motorists	9	35%	The high car dependency levels are recognised in the Bromley Local Plan which sets a minimum provision for car parking, and Policy 31 seeks to relieve congestion.

Make Developer Responsible	8	31%	The Bromley Local Plan policies ensure that the developers are responsible for transport related matters as part of the planning process.
Treat Each New Development Differently	4	15%	Planning policy requires that each new development is considered on the individual merits of the planning application.
Focus on New Homes Near Existing Transport Options	3	12%	The Bromley Local Plan encourages patterns of development that reduce the need to travel, locating major developments where they can maximise the use of public transport, include electric charging points, cycling facilities and car clubs where appropriate.
Consider Tram Extension	2	8%	The Council has set out its priority corridors for new public transport connectivity in Outcome 5 and at this stage does not want to commit to a particular mode before feasibility and high level assessments of value for money have been made for public transport improvements on these corridors.

General issues raised including email responses from individuals

Overall Comments	Total	% of commenting respondents	Response to issues raised
Rail Improvements	14	13%	The Borough has set out its priorities for rail improvements to lobby for in Outcomes 5, 6 and 7.
Bus Improvements	14	13%	The Borough has set out its priorities for improvements to bus services and infrastructure in Outcomes 5, 6 and 7.
Station & Bus Stop Improvements	10	9%	The Borough has set out its priorities for improvements to rail stations and bus stops in Outcomes 6 and 7.
Promote Cycling & Infrastructure	12	11%	The Borough has set out detailed plans for improving cycling infrastructure in Outcome 1 of the LIP.
Less On Street Parking	5	5%	The Borough recognises the competing demands for kerb space and has set out its proposals to manage parking and implement parking controls in Outcome 4.
Pedestrian Safety	14	13%	The Borough has ambitious targets to improve road safety and with the proposals set out in Outcome 2 will seek to deliver enhanced pedestrian safety.
Reduce Car Use/Rat Runs	19	17%	Through proposals for the cycle network and local neighbourhood schemes set out in Outcomes 1 and 2 respectively, the Borough will seek to reduce rat running where it supports strategic priorities and where appropriate.
Lower Vehicle Speeds	14	13%	The Borough has set out its approach to speed management in Outcome 2.
More Consultation	11	10%	The Borough will undertake consultation and engagement proportionate to the scale of the proposal. For larger schemes the Borough will aim to take a co-development approach working with key stakeholders and communities, detailed in the

			Delivery Plan.
Distance LBB from Mayor's Transport Strategy	4	4%	The LIP is a statutory document prepared under section 145 of The GLA Act and sets out how boroughs will deliver the Mayor's Transport Strategy in their area. Each borough is required to produce a LIP, which must be approved by the Mayor.
Improve Air Quality	6	5%	The Borough does not experience the same level of air quality issues as many areas of London however it has set out proportionate proposals to improve air quality in Outcome 3 of the LIP.
More Parking	1	1%	The Borough recognises the competing demands for kerb space and has set out its proposals to manage parking and implement parking controls in Outcome 4.
Rail Links to DLR/Docklands/Canary Wharf	8	7%	Outcome 5 of the Borough's LIP identifies improvements to connectivity between Bromley Town Centre and Canary wharf which this is likely to fall under, however the exact proposals and destination of a future service needs to be developed with TfL and Network Rail.
Bakerloo Line Extension	5	5%	Outcome 5 of the Borough's LIP sets out the Borough's position with regards to supporting the Bakerloo Line.
More Focus/Allowance for private vehicle	12	11%	Providing benefits directly for private vehicles will not enable the Borough to address the long term challenges of growth highlighted in the Introduction to the LIP.
Less Focus on Cycling	9	8%	High-quality cycle infrastructure is required to accommodate the anticipated growth in trips over the next two decades, which if all made by car would lead to worsening congestion. Therefore reducing cycle infrastructure would undermine this approach.

Walking/Cycling & Parking at Schools	8	7%	Promoting walking and cycling to school is a key priority of the LIP and proposals have been set out in more detail in Outcome 1 of the final LIP.
Incentivise Walking, Cycling and PT	7	6%	Through the proposals throughout the LIP, the Borough believes that it is delivering high quality infrastructure for walking and cycling to make it an attractive and realistic choice for travel.
Do Not Extend Tram	5	5%	The Council has set out its priority corridors for new public transport connectivity in Outcome 5 and at this stage does not want to commit to a particular mode before feasibility and high level assessments of value for money have been made for public transport improvements on these corridors.
Extend Tram	3	3%	The Council has set out its priority corridors for new public transport connectivity in Outcome 5 and at this stage does not want to commit to a particular mode before feasibility and high level assessments of value for money have been made for public transport improvements on these corridors.
In Favour but Need to be More Ambitious	18	16%	The Borough believes that the LIP is ambitious but realistic with the limited resources available as set out in the Delivery Plan
No 20 MPH Zones	6	5%	The Borough has set out its approach to speed management in Outcome 2.

Online consultation survey (PDF Format)

Bromley LIP3 consultation

1. About you

Bromley is consulting on its Third Local Implementation Plan for Transport (LIP3). This sets out the Borough's approach to transport, including our ambition to improve road safety and reduce road danger, and investment priorities for both the next three years as well as in the longer term to 2041 at a more strategic level.

We're keen to hear your views and would appreciate it if you could take a few minutes to give us your thoughts on our proposals for the 9 outcomes set out in the LIP. To make it as easy as possible to respond, there is no need to answer all questions if you are only interested in a particular Outcome of the LIP.

Whilst we may publish the opinion of group responses and anonymised comments from individuals, be assured that any personal data and opinions collected will not be used to identify individuals and will only be used in compliance with legislation, including GDPR. Also, by responding to this consultation, you will not be contacted again about this information by the Council, with the data only being in connection with this consultation.

If you wish to make additional comments relevant to the consultation, you can email these to transport.strategy@bromley.gov.uk or alternatively, you can write to the LIP Consultation Team, Bromley Civic Centre, Stockwell Close, Bromley BR1 3UH.

Due to the anticipated volume of responses, we regret that we will not be able to respond to any respondents but your views will help us to shape the final document that will go the Mayor of London in February 2019 for approval.

* 1. Please select if you are replying on behalf of an organisation or as individual?

Individual

Organisation, please state the name of the organisation

2. If you are replying as an individual please select which best applies to you.

Resident

Work in the Borough

Regularly visit the Borough for shopping/leisure

Other (please specify)

3. Please state your home postcode or postcode of organisation

1

4. What is your age?

- 25 or younger
- 26-40
- 41-60
- 61-75
- 75 or over

5. Please select the modes of transport you use regularly i.e. once a week or more

- | | |
|---|--|
| <input type="checkbox"/> Car Driver | <input type="checkbox"/> Walk |
| <input type="checkbox"/> Car Passenger | <input type="checkbox"/> Cycle |
| <input type="checkbox"/> Tram | <input type="checkbox"/> Motorcycle |
| <input type="checkbox"/> Train | <input type="checkbox"/> Taxi/Private Hire |
| <input type="checkbox"/> Bus | |
| <input type="checkbox"/> Other (please specify) | |

2. Outcome 1: London's streets will be healthy and more Londoners will travel actively

6. Please respond to the following statements, indicating your views about our proposals to improve conditions for walking and cycling and cycling.

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	N/A
Do you agree with the cycling corridors/routes and areas of cycling potential we have proposed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposed approach to cycle parking?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposals for an electric bike share scheme?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposals to improve pedestrian crossings?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposals to encourage walking to school?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any comments you have about our proposals for Outcome 1.

3. Outcome 2: London's streets will be safe and secure

7. Please respond to the following statements, indicating your views about our proposals to improve road safety and reduce road danger.

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	N/A
Do you support the Borough's aspiration to eliminate deaths and serious injuries on the roads by 2041?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support the Borough's approach to targeting cluster sites to improve road safety?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposed approach to promoting safe and appropriate speeds?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support the proposals to reduce rat running through local neighbourhood schemes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with our approach to road safety education?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any comments you have about our proposals for Outcome 2

4. Outcome 3: London's streets will be used more efficiently and have less traffic on them

8. Please respond to the following statements, indicating your views about our proposals to make efficient use of road space and reduce congestion.

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	N/A
Do you support the proposals to invest in infrastructure for space efficient modes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support the expansion of the Borough's car club network?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support the proposals to result in net mode shift to space efficient modes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with our approach to making freight more efficient in the Borough's town centers?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any comments you have about our proposals for Outcome 3

5. Outcome 4: London's streets will be clean and green

9. Please give us your opinion on our proposals to improve air quality and improve the environment

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	N/A
Do you support the Borough's targeted approach to improving Air Quality?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support proposals to 'green' the borough's fleet and infrastructure?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with our proposals to tackle unnecessary vehicle idling?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support the proposals to increase the availability of electric vehicle charging infrastructure in the Borough, including proposals to deliver fast/rapid electric vehicle infrastructure for Taxis?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any comments you have about our proposals for Outcome 4

6. Outcome 5: The public transport network will meet the needs of a growing London

10. Please give us your opinion on our proposals to work with partners to plan and improve new connectivity and capacity on the public transport network.

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	N/A
Do you agree with our proposed corridors to deliver new public transport connectivity on?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with our broad approach to developing routes and improving bus services in the Borough?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you agree with our proposals for new express bus routes for Biggin Hill SOLDC?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposals to improve station access for pedestrians and cyclists?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any comments you have about our proposals for Outcome 5

7. Outcome 6: Public transport will be safe, affordable and accessible to all

11. Please give us your opinion on our proposals to work with partners to improve the accessibility of the transport network.

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	N/A
Do you support our proposals to lobby to make Penge West step-free?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposals to lobby to make either Chislehurst or Elmstead Woods station step-free?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support our proposals to make bus travel more accessible?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any comments you have about our proposals fro Outcome 6

8. Outcome 7: Journeys by public transport will be pleasant, fast and reliable

12. Please give us your opinion on our proposals to improve the reliability of the bus network and lobby to improve the reliability of the rail network.

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	N/A
Do you support our proposals to improve the reliability of bus routes in the Borough?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support the Borough's proposals to lobby for a more reliable railway?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do you support the Borough's proposals to lobby for increased weekend rail frequencies?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please add any comments you have about our proposals for Outcome 7

9. Outcomes 8&9 transport at new development

13. Please give us your opinions on our proposals to improve transport at new developments.

Strongly disagree Somewhat disagree Neutral Somewhat agree Strongly Agree N/A

Do you agree with our approach to reducing the impact of new development through improved infrastructure for walking, cycling and public transport?

Please add any comments you have about our proposals for outcomes 8 & 9

10.

14. Please add any further comments you have about Bromley's draft LIP3

11. Thank you

Thank you for taking the time to participate in our LIP3 consultation.

Please visit the Council's website in March 2019 to view a report of the consultation results and the final LIP3 document.

Responses from Organisations



National bodies

Response from Highways England

Thank you for consulting us on the Draft LIP 3.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN.

In the case of the area covered by the London Borough of Bromley, it includes or is in close proximity to the A20, M20 and M25. These areas of the SRN are heavily congested areas and any material increase in traffic on this section of the SRN would be a concern to the Highways England.

In spatial planning and development control terms, we have a duty to safeguard the operation of the SRN as set out in the DfT Circular 02/2013 (The Strategic Road Network and the Delivery of Sustainable Development). The circular encourages Highways England to work co-operatively with Local Planning Authorities within the framework of the Government's policies for planning, growth areas, regeneration, integrated transport and sustainability.

We recognise the requirement to comply with the MTS which is demonstrated through your LIP. The LIP3 promotes and supports the Mayor's Transport Strategy by increasing travel by sustainable modes, Highways England support increase in sustainable travel. It should be noted that Highways England should be consulted on any development that may have an impact on the SRN.

Thank you for consulting us and we hope that are comments are useful. If you have any questions, please do not hesitate to get in contact with us.

Response from Natural England

Date: 09 January 2019
Our ref: 265737
Your ref: LIP 3 for Transport



Mr A Baldwin-Smith
Senior Transport Planner
LIP Consultation Team
Bromley Civic Centre
Stockwell Close
Bromley BR1 3UH

Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY
transport.strategy@bromley.gov.uk

T 0300 060 3900

████████████████████

Draft Third Local Implementation Plan for transport (LIP3)

Thank you for your consultation on the above dated and received by Natural England on 26th November 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England does not consider that this Local Implementation Plan for transport poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

Yours sincerely



Response from NATS

We acknowledge receipt of your correspondence dated 29th November 2018 and sent to our office. NATS has no comments to make in respect of the LIP consultation. We would like to take this opportunity to kindly request you update your records with our contact details, and note our preference for receiving correspondence by email.

DRAFT

Transport groups

Response from London Travel Watch

London TravelWatch is the statutory body representing transport users in London.

This note describes the issues that we are asking London boroughs to consider as part of their Local Implementation Plan (LIP) in fulfilment of the requirement of the Mayor's Transport Strategy.

Understanding the role of the bus.

The bus plays an enormously important role in the vitality and viability of London's towns and cities. Bus services allow everyone to travel journeys that won't often be taken by many on foot or by cycle. They help to reduce the amount of traffic on London's streets and support other active modes as well as necessitating a walk to and from the bus stop. Buses are the most efficient users of space on the roads.

It is therefore important that bus services have priority on all the roads they use and have privileged access to passenger travel objectives, particularly town and city centres. Excluding buses or prioritising other modes on the roads may be detrimental to both bus passengers and policies to improve cycling and walking.

Bus priority

London's bus services are the only fully accessible public transport covering the whole of Greater London, operating 24/7 and offering the most affordable fares. London TravelWatch wants to see buses have priority on all the roads they use. LIPs should include:

- Programmes to increase the operational hours of bus lanes and other priority measures. This will have the additional benefit of improving cycle journeys.
- Programmes to review waiting and loading on roads used by bus services and the removal of parking and loading where it delays bus services. This will have the additional benefit of improving cycle journeys.
- Programmes to complete accessible bus stop works. This will improve access for everyone. All boroughs should have a target of 95% of their stops being accessible.
- Programmes to convert 'hail and ride' services to operate with fixed stops. This will improve access for everyone and improve bus service performance,
- Programmes to ensure bus priority and other restrictions are enforced.

London TravelWatch has also supported the schemes at Bank Junction and Tottenham Court Road where buses and cycles have been prioritised during the day, with other vehicles only allowed access.

Streets as places

London TravelWatch supports the approach set out in the TfL commissioned Gehl Architects report: *Towards a fine city for people*^[1]. The report advocates that creating places where people want to spend time is as important as creating highways for them to travel along. Pocket parks, wider pavements, street trees, public drinking fountains, places to sit and to play are an important part of creating a city where people use active modes.

More and safer walking

Walking is by far the most used mode of transport in London. It is a component of almost every journey, but is overlooked in its consideration. Improvement can be very easy and effective, such as introducing a dropped kerb on pedestrian desire lines.

Pedestrians want to wide, clear, level pavements that make walking easy and attractive for everyone. Pedestrians want road crossing on desire lines and the opportunity to cross at will. Formal crossings are particularly important for disabled people and those escorting children. LIPs should include:

- Programmes to clear highway obstructions. Local highway authorities have a statutory duty and powers to keep their pavements clear of obstructions such as advertising boards. However, only a small handful of councils in London undertake this statutory duty properly. Most leave London's streets as an obstacle course, strewn with advertising boards. The Mayor's Transport Strategy is supportive of keeping London's pavements clear of obstructions. We advocate that London boroughs should include this in their LIPs.
- Programmes to remove unnecessary highway furniture and clutter. There are huge amounts of clutter on London's pavements. There are poles with signs to manage parking and traffic, pedestrian guard railing, commercial advertising hoardings and telecoms equipment. Some of this is necessary, but some is not. Local authorities can remove some of this and should be encouraged to do so, for example by locating parking signs or street lamps on building walls or just reviewing whether not items are necessary or not.
- Programmes to introduce dropped kerbs and crossovers. This is very simple and relatively cheap. It is essential for wheel chair users and buggy pushers to get around the street, but also make walking for everyone a little easier.
- Programmes to introduce street nameplates. In 2003 London TravelWatch undertook research^[2] looking at the issue of street nameplates: *Where am I?* We found that too many streets were not properly signed and that this was a disincentive to walking. It was also an issue for the emergency services because although they could locate a street themselves, a caller on the street would often not be able to identify their location. This was a particular issue for the London Ambulance Service.

^[1] Towards a fine city for people, Gehl Architects:
https://issuu.com/gehlarchitects/docs/issuu_270_london_pspl_2004

^[2] Where am I? http://www.londontravelwatch.org.uk/documents/get_lob?id=2496&age=&field=file

- Programmes of map based wayfinding similar to Legible London. London TravelWatch was involved with the introduction of Legible London, a map based pedestrian wayfinding system. This allows pedestrians the comfort of being able to walk around an unfamiliar area and explore without getting lost. Its 'heads-up' mapping is particularly user friendly. Legible London is described at: <https://tfl.gov.uk/info-for/boroughs/legible-london> We are particularly asking London boroughs to install legible London, but remind them that it is a map based system. It was never intended that fingerposts be used as they are being at present, because so much information is lost where fingerposts are installed instead of proper mapping.
- Seating to rest.

More and safer cycling

In December 2017 London TravelWatch published its report *Cycling in London*. The report described policies to enable more and safer cycling. This is available at: http://www.londontravelwatch.org.uk/documents/get_lob?id=4469&age=&field=file. The report proposed twelve policies to promote and enable more and safer cycling. LIPS should include some or all of these measures

- A wider and more sophisticated system of roads pricing – charging for the use of the busiest roads at the busiest times;
- Parking policies to restrain driving – reducing parking availability in areas and at times where non-car modes are good;
- Car-free housing development – housing without on or off-street parking;
- Closing minor roads and central areas to through motor traffic, thereby improving local streets for cycling and walking;
- Slower speed initiatives using traffic calming, activating the street and introducing appropriate speed limits;
- Cycle specific infrastructure – lanes, tracks, advanced stop lines (see Appendix D for some issues that should be considered when designing for cycling);
- Clear space for cycling – wide inside lanes, 24/7 bus lanes, bus and cycle only streets and parking restrictions on main roads;
- Highways and traffic management changes targeted at those locations most problematical for cycles;
- Side road entry treatments and the removal of left slip lanes – re-engineering intersections to make them safer;
- Training education and enforcement;
- Cycle parking and storage at home;
- Rail stations as cycle hubs – enabling more linked cycle and rail trips.

Road safety

London TravelWatch supports TfL's *Safe Streets for London*^[3]. London TravelWatch supports slower speeds, traffic reduction and targeted highways engineering

^[3] *Safe Streets for London*: <http://content.tfl.gov.uk/safe-streets-for-london.pdf>

interventions at those locations with histories of high casualties, often road intersections.

The competing demand for road space in cities.

Designing or remodelling a city's streets is easy if it is to be done for one mode. Designing for walking, cycling, buses, private vehicles, delivery vehicles and for London's streets to be attractive public places, is more difficult. The latter is the challenge for London. This complexity is compounded because different people have different needs. Therefore, the process of designing a city's streets needs to be undertaken in a sophisticated manner with an understanding of the impacts on all the multiple users and uses of the street.

A role for road user charging

High volumes of motor traffic and the resulting congestion means slower journeys for everyone. Enabling modal switch to the most space efficient modes can go some way to tackling this, but will be insufficient to improve journey times and allow the most effective use of road space and facilitate safer journeys. London TravelWatch supports the investigation of road user charging by London boroughs.

Rail

Stations will always be accessed by a surface mode. London TravelWatch wants to see interchange improved both inside the curtilage of stations and with the surrounding streets. Passengers, like pedestrians in general, want to see wide, clear and level footways with road crossings at appropriate places, good signing and bus stops nearby. In 2015 London TravelWatch published interchange matters^[4]. This describes these issues.

As part of its work on cycling in London, London TravelWatch produced mapping^[5] to demonstrate how cycling could increase the catchment of stations in outer London, and indeed that almost all Londoners are within a 15 minute cycle of at least one station. Local highway authorities should consider area wide schemes to improve access by cycle to their local stations as part of the LIP process.

If you have any questions please contact me.

^[4] *Interchange matters*: http://www.londontravelwatch.org.uk/documents/get_lob?id=4040&field=file

^[5] Mapping of 15 minute cycling isochrones to and from outer London stations
<http://www.londontravelwatch.org.uk/news/view?id=669>

Response from Bromley Cyclists

Here is Bromley Cyclist's response to the Council's consultation on LIP3. We hope it proves constructive and useful.

A. Bromley Cyclists' and London Cycling Campaign's overall reaction to the LIP is very positive

It recognises a range of key strategic issues and the need to plan for them, notably:

- Rapid population growth, and the need for averting action in order to avoid gridlock – notably modal shift towards public transport and active travel, in line with the Mayor of London's transport strategy to 2041;
- The need for priority action around town centres where population is growing fastest, and where (according to P28), it will be important to improve local conditions for cycling 'by reducing the severance caused by major roads on their approaches'.
- The need to tackle air pollution, particularly in places like schools where people spend significant time.

The LIP advocates measures Bromley Cyclists have been seeking for years including strategic cycle routes, tackling the school run and our worst collision hotspots. It also tells us that Bromley and Lewisham are working together to develop a segregated cycle lane along the A21 corridor, with junction improvements that will allow safe segregated cycle access to the town centre.

B. While this is all very welcome, some 'meat' needs to be put on the strategy, notably as regards:

- A 'big picture' vision for a borough-wide cycle network – there need to be main road cycle tracks, not just Quietways.
- Low traffic neighbourhoods – the LIP is good on the theory, but needs more specific commitments, notably to filtering to control rat running, restricting car parking or car access (e.g. in town centres) - how many of residential streets will be filtered by 2025 and 2041?
- More comprehensive plans for developing cycling to rail – we see certain useful interventions, notably the Crofton Road improvement, the Cycle Hubs planned at Orpington and Elmstead Wood station, and planned Quietways connecting to certain stations, but minimal consideration is given to Bromley South, the Borough's leading station (see C below) and other stations
- Funding infrastructure improvements with LIP money, rather than simply relying on TfL (notably in the case of the A21 corridor and junction improvements)
- Consideration of measures of road danger other than KSIs, notably the deterrent effect of people not cycling or walking because of perceived danger – here we note Chislehurst Safer Streets contribution saying that: 'many elderly people report not making journeys by foot to visit old friends they would have taken with alacrity 10 years ago'

- Clarity as to how the Borough will achieve its ambitious objectives for travel to school. Currently around 40% of children are driven to school, but the LIP plans for 50% of travel to school trips to be by active modes and 20% by public Transport by 2021/22. Plans could include 'school streets' for which there are clearly designated opportunities, timed closures, through traffic restrictions and more rapid development of the cycle network.
- The implementation of 20mph on cycle routes where there is no segregation/protection

We would suggest Bromley Council sets a target for 15% local transport infrastructure spending on active travel, [as advised by DfT](#).

C. We see a pressing need to break down silo thinking and ensure consistent implementation across Council departments

The LIP is only as good as the way it is implemented, and in this regard the Council's recent handling of the planning proposal and subsequent appeal for the SHaW Futures Academy leaves much to be desired. While certain Council officers worked purposefully on the LIP, the relevant thinking does not seem to have filtered through to departments concerned with planning. The LIP as well as prior policies and plans¹ prioritise active travel to stations like Bromley South, but Council highways specialists and consultants did not reference them in papers submitted in advance of the planning decision of December 2017 and the Inquiry of November 2018. The likely consequence will be to set in stone poor physical facilities that frustrate future transport improvements at the Westmoreland Road/Masons Hill junction, making it difficult for pedestrians and impeding a necessary modal shift towards cycling by commuters, schoolchildren and others. This is an inauspicious start, quite **the opposite of what the LIP sets out to achieve.**

There also seems to be a pressing need for more joined-up thinking on the relationship between active travel and health. The [Bromley Health and Wellbeing Strategy 2018-2022](#) contains no mention of 'active travel', 'cycling' or 'walking' despite 'obesity' and 'diabetes' being Priority 2 and 3 respectively. Similarly, there is no mention of 'active travel', 'cycling' or 'walking' in the [Adult Care and Health Portfolio Plan 2018-2022](#), or it seems, in the [Joint Strategy for Ageing Well](#) in Bromley 2019-2024 due to be published April.

Given Public Health England (PHE) advice on embedding active travel into our daily lives, we need much more cross-portfolio working within Bromley Council. Silo thinking will cost us dear at a time of austerity and budgetary constraints.

¹ Bromley Cycling Strategy of 2015, the Section 4 of the Draft Local Plan of 2016 (imminently to be adopted).

Response from Bromley Living Streets

This response relates to the following Outcomes:

Improve infrastructure for Walking & Cycling, Improve Bus Reliability, Reduce Congestion through mode switch, Maintain & Improve air quality

All of these Outcomes rely on reducing Traffic in and through the Borough and it is our belief that the introduction of **Low Traffic Neighbourhoods** could meet many of the Council's LIP Targets in a cost effective & timely manner.

Low Traffic Neighbourhoods can often be funded from new & additional car parking charges or Section 106 Agreements and meet the expressed needs of residents. Moreover, they go some way to tackling obesity, pollution and congestion issues. Many areas of the Borough lend themselves to becoming Low Traffic Neighbourhoods with traffic focussed on classified roads around the LTN area. A series of measures could easily be introduced to discourage speeding on those routes and supported by inter modal measures to reduce car use by stopping or lowering through traffic.

Once successfully introduced, **Low Traffic Neighbourhoods** can more easily be converted to the more comprehensive Liveable Neighbourhoods if appropriate. **Low Traffic Neighbourhoods** are, therefore, a low cost route to improving residents lives meeting TFL targets for Vision Zero, pollution and congestion. They also meet cycling and walking targets enabling our streets to be fit for use. **Low Traffic Neighbourhoods** are an affordable entry model to Liveable Neighbourhoods.

Speed of traffic on residential roads is a big issue – a recent poll by the Police Commissioner for England (Road Safety) showed that 85% of people wanted stricter enforcement of traffic laws and 80% wanted tougher penalties for speeding. A blanket approach of 20mph across the Borough is not practical or desired but specific residential and/or unclassified streets could be and should be protected from speeding drivers/rat running.

TfL casualty data shows Bromley as having the highest proportion of its casualties occurring on its residential roads (in 2017, 25% of all casualties in Bromley occurred on unclassified roads compared to the Greater London average of 18% and the Outer London borough average of 20%). The **Low Traffic Neighbourhood** approach when combined with lower speed limits offer the opportunity to begin to address this significant problem.

Low Traffic Neighbourhoods reduce traffic by 17% through 'evaporation'; additionally school run traffic accounts for 25% of our traffic. Anything close to these reductions in traffic would be a great start.

Specific ways to move forward on **Low Traffic Neighbourhoods** might be to:

1. Use the Council's Traffic & Road Safety Unit to identify – in consultation with local communities- potential **Low Traffic Neighbourhoods** with health, traffic & pollution hotspots, as has been done successfully with road traffic accidents.

2. Have an Exclusion Zone outside schools say of 200 metres where no drop-offs could happen. In Hayes, for example, there could be an airport style drop-off zone in Old Hayes High Street with a 2 minute wait time.

3. Working with schools to set identifiable targets and action plans for walking to school i.e. to increase this by 10% per annum

4. Impose car parking restrictions/additional charges to encourage modal change

We have to start somewhere and concrete measures need to be taken to increase the health of our residents, reduce congestion, improve Bus reliability and reduce pollution now.

DRAFT

Response from Bigfoot CC

Thank you for allowing Bigfoot to contribute our opinions on this impressive piece of work.

Bigfoot is a Bromley based cycling club with approximately 400 adult riders and similar numbers in the youth, junior and mini sections. We therefore influence around 4,000 Bromley's individuals including riders, family members and close friends.

We are a not for profit organisation, recently formed into two companies supporting riders for fun, health, sports and commuting. Our activities include leisure rides, family rides, training, mountain biking and competitive racing.

On the whole we are a healthy group, with no known incidents of type 2 diabetes with most riders looking to have a BMI under 25*.

We ride mainly in Kent and Surrey, covering around 130,000km per month (summer months) less in the winter, when fitness is aided by turbo-trainers*.

* Best estimate only.

This impressive document has an overwhelming range of references, which clearly feeds into other projects and initiatives from TFL etc. Further, the technical information required to understand the formation of traffic structures requires a substantive knowledge. Given the short timeframe to understand this total document I fear that this response is lacking in detail and background references and has being difficult to enlist detailed discussions with the club.

As a group we support the outlined recommendations of increased cycling in Bromley in every aspect, welcoming the initiative to create quiet ways in around Shortlands, boost cycle hire, continue with schools service and install cycle parking sites etc. All are to be applauded.

We also feel the plan is a little conservative in its outlook. It seems to look to maintain the status quo as far as possible for cycling. Other cities are doing a much better job: <http://copenhagenizeindex.eu>, we feel the plan is using twentieth century technology and ideas to answer twenty first century problems. We also would like to outline several areas where the Borough is sending mixed messages to cyclists and potential riders.

Thought a traffic implementation document we were hoping to see more holistic and connective initiatives in particular linked with health.

On 4th Jan NICE (National Institute for Health and Care Excellence) launched a consultation document considering road planning. Pedestrians, cyclists and public transport should be given priority over cars when roads are built or upgraded, to

encourage more physical activity, citing transport systems and the wider built environment, which can influence people's ability to be active

Outlining the following recommendations:

- Ensuring new and refurbished footways, footpaths and cycle routes link to existing routes
- Widening footways and introducing cycle lanes
- Introducing traffic-calming schemes to restrict vehicle speeds
- Paying more attention to public transport in rural areas where services may be limited
- Improving public transport to parks and other green spaces

Clearly some of these recommendations are covered in the referenced documents and initiatives, the implementation plan we believe needs to reference health as an objective for planning not as by product, with local cycling for leisure and commuting being an essential ingredient.

We feel the Implementation plan does not embrace healthy lifestyle changes that must be promoted positively and acknowledge any changes will limit or inconvenience relatively 'unnecessary' car journeys. A paradigm shift in thinking is required!

We would as part of the plan, ask Bromley's Health Education team to require NHS (primary and secondary care) to provide secure cycle parking bays in all their facilities. An obvious example is provision of parking at the PRUH, the car park is full (8am to 8pm) with overspill into Sainsbury's car park. There is no cycle parking facilities in the PRUH, the locked unused acrylic shed is for staff only. The bus service is relatively empty.

Linking life style, transport and health via innovation

We found the implementation plan did not include positive inducements for sustainable transport. We had hoped to see the plan use 'smart technology' with Apps or social media to reward residents for using cycles, walking or public transport at commuter times and further investing in their health by taking physical activity during the weekends. The system used in towns such as Bologna illustrates how 'Green Points' can be earned, which can then be used as discounts for lifestyle products from local retailers. Further, by illustrating how slow traffic is moving on key commuter routes by motion sensing technology and Apps making commuters consider their transport options like priority bus transport. In effect linking healthy transport to the local community with live reports.

The plan regularly refers to Bromley's size and situation to open countryside as a negative, whereas this is one of the major reason families want to live in the Borough. The area's lifestyle advantages are enormous and should be used as a link between healthy leisure options and commuter transport decisions. Cycle cubs like Bigfoot take advantage of North Downs and Kent Countryside virtually every day and these links should be build-up in the plan.

The Council has an excellent schools riding programme, which we support unanimously with club members involved with the training. We find the two grid-locked parking periods outside the school gates frustrating, as all families live within easy walking distance of the school gate. Could the plan include the Councils parking enforcement officers be used positively to advise drivers of the health benefits of riding or walking to school for their children and themselves? If not stricter conditions could be imposed to limit these journeys.

Education in cycling

No commuter wakes on a wet Wednesday morning in February and decides to ride to work that day. Commuting needs, the right bike, clothing, fitness, determination and skills. Any instant decision to ride that day may deter the rider till the summer, at least. Bromley's Bikeability (1-3) is a good start but we need or want a paradigm shift in commuting and social health decision and the scheme currently is not expansive for adults and families plus needs to operate fully at weekends.

Why people don't cycle, getting the basics right

For the implementation plan to really work in the format as published there needs to be a host of objections overcome.

Road surface - Potholes

In 2018 the government published findings from the last thirteen years showing an increase in cycling miles, but a decrease in cycle journeys. Edmund King of the AA is on record as blaming our poor and deteriorating road surfaces as a major reason for not riding, quoting three fifths of all adults think UK roads are dangerous.

The implementation plan does not cover the repair of the road. From Bigfoot's point overview potholes and poor road surface in 2018 was the largest cause of major accidents that resulted in hospitalisation of its riders namely broken collarbones, arms and ribs.

The 'fix my street' website is a powerful tool and much used to pin point individual problems in the road surface. Communication with EDS traffic about stretches of road surface on Green Gates Rd, Nash Lane and Layhams Rd with approx. 50

potholes have been acknowledged in October '18 but as yet no repairs have been made.

The implementation plan does not cover improvement in the road surface where other outside service providers are encountered. The recent debacle on Layhams Rd involving Thames Water was a perfect example of how poor agencies work together, the water leak was repaired after an accident, concerted media campaign and four months of lobbying.

Cycle harassments by drivers

The Implementation plan does not indicate how to deal with harassment. Verbal abuse, having lit cigarette butts flicked at you, sounding of horns behind a rider, close passes, driving through puddles to direct water at the rider, overtaking and stopping directly in front of the rider, opening van doors are all part of the list of daily aggressive actions from car drivers aimed at cyclist, mainly for being on the road traveling at a speed less than they would want. Bromley has instigated a 'close pass' instruction procedure in conjunction with the police, which needs to be expanded. Drivers who are aggressive to cyclist should be named, shamed and potentially prosecuted. Dot matrix boards should be circulated around the main highways in Bromley explaining the legal and courteous requirements of drivers towards cyclists. Followed by on the spot fines from the police if the law is not followed. The law also applies to cyclists, who know riding through a red light is illegal and dangerous.

Busy roads

For this paradigm shift to take place in social transport, the car driver needs to understand they are the issue, not the person on a bus or walking or riding to the station, which is not spelt out in the implementation plan. Environmentally, worldwide Starva the activity App estimates its users offset 745 million kg of carbon a year by commuting via cycle or running. With 50% of the air pollution in Greater London created by vehicles, swapping to sustainable journeys means that every single cycle or walking commute helps reduce the carbon foot-print, could the plan include carbon free days in the Central Bromley area to highlight the need for change and duties for high polluting vehicles?

Separated cycle lanes may not be appropriate in Bromley unless there is a fundamental change to the road use pattern due to the restricted width of the Borough's roads. This change would need large one-way traffic flow schemes being introduced and considerable work to pacify local pressure groups. In the short to medium time frame better training for drivers and cyclist i.e. mixed use roads would assist the confidence of cyclist, this training to start in schools and encouraged through colleges and into the work place. Employers could be encouraged to build facilities for cyclists though a grant scheme funded through the Implementation plan.

Road planning for cycling

The implementation plan outlines a series of initiatives on road planning, which is at odds with current road works and plans. Recent examples of the wrong message been sent out is on the A21, part of the cycle lines have been removed (due to being too narrow) at the Hayes Lane cross road traffic lights there are only advanced cycle stopping areas on the North/South lights and nothing on the East/West lights and none of the lights have separate cycle specific early start traffic lights. At the St Marks Junction there seems to be no benefit for cyclist. The cost of both junctions must stretch in the £100k's spent on them.

Improved junctions must be improved for cyclists. Could we suggest a published list of cycle friendly works be included in Implementation plan before major road works are instigated to ensure improvement is that?

The traffic planning should be linked to construction of the built environment, not only the roads.

Initiatives taken by other councils:

- Provision to be made for personal cycle storage in all new flat developments
- Collective cycle storage made available for flat conversations
- Leisure and social facilities to have lockable cycle racks

Regard cycle hire schemes, permanent docking stations are better than the type where bikes are simply left on the street, though more expensive. Cycles are abandoned on commuter routes to Canary Wharf, etc. which are a hazard particularly for pedestrians the partially sighted and people with children. The abandoned cycles also sends out the wrong message on 'value and care'.

Our club members have also requested specialist consideration to be made for the following groups in the plan:

Elderly riders, the publication 'Aged Cell' in 2018 illustrated participation in physical activity highlighting cycling's health benefits of riders into their 80's.

Our members commented on the number of women commuters on cycles, could the plan include an investigation why there seems to be fewer women riders? After investigations make recommendations to promote and encourage female cycle commuting.

Response from The Alliance of British Drivers (ABD)

Bromley LIP – Better Than Some But Not Good Enough

You would expect that Bromley's LIP would be more sympathetic to vehicle users, and so it is to some extent, but it's far from perfect. Bromley is a large borough with very high car ownership levels and some parts of the borough, such as Biggin Hill, have relatively low public transport accessibility. Poor orbital connectivity of public transport is also a problem that encourages car use. It is also hilly in parts which mitigates against cycling. But the future transport policies are to a large extent by the Mayor of London, Sadiq Khan – indeed I suggest that this LIP kowtows too much to the Mayor's desires.

But Bromley's population is growing like most London boroughs so traffic congestion is getting worse. The Mayor would like 80% of trips in London to be taken but Bromley is proposing targets of 47% by 2021 (1% change) and 60% by 2041. These figures will be achieved by encouraging more walking and cycling and by public transport improvements. To encourage cycling it is proposed to develop the Strategic Cycle Network and expand Quietways.

As regards road safety, Bromley has a good record – reducing KSIs from 230 in 1999 to 50 in 2014. This has been done by concentrating efforts on accident hot spots and good education programmes, and it is good to see that these policies are being continued. However there was an increase in KSIs in the last couple of years even allowing for adjusting to the change in accident recording. As in Lambeth, there is a disproportionate casualty incidence for pedal cyclists. Yes cycling is dangerous. This was made clear by a recent press release by a road safety organisation which said that people on two wheels face a 63 times higher risk of being killed or seriously injured (KSI) per mile travelled than car drivers. But the Mayor still wants us to cycle which might be good for your health in other ways but is clearly risky. It might also explain the declining safety record as regards KSIs in the last couple of years.

As regards safe speeds, the borough suggests that removing entre line markings can have a significant impact on traffic speed. But does it make the roads safer? And this is what they have to say on 20 mph limits which is more sensible: "With regard to 20mph speed limits and zones, the Borough does not believe that a blanket approach is the most effective means of improving road safety. Too often such schemes do nothing to change the characteristics of the street and lead to only quite insignificant reductions in speed and the cost of a Borough wide approach would also mean that resources would be diverted from schemes that tackle actual hot spots and priority areas that require more significant engineering measures. There is also a concern that borough wide approach could lead to an element of driver fatigue with the result that the key areas for driver attention are no longer prominent. The Borough will therefore adopt a targeted approach to the introduction of 20mph speed limits or advisory limits.....". An eminently reasonable approach and which accords with the evidence on 20-mph schemes just published by the Department for Transport (DfT).

Apart from relieving traffic congestion by “mode shift”, they propose to promote the use of car clubs and various approaches to reduce van deliveries such as central consolidation centres with local cargo bike provision.

Air quality is not a major problem in Bromley but there are some “hot spots” that need improving. These will be tackled by specific measures – details to follow in the Borough’s Air Quality Action Plan, but the measures look relatively harmless such as encouragement of electric vehicles and anti-idling measures.

There are many initiatives proposed to improve access to public transport such as to buses and train stations which are positive, but they also wish to improve bus journey times. One proposal to assist is to extend the hours on some bus lanes. The ABD believes bus lanes should be removed not extended. They create congestion for other vehicles and do not necessarily assist with improving total people movement.

Many of the proposals do of course depend on funding from Transport for London (TfL) as local boroughs have very little of their own funding for transport programmes. This is evident from page 91 of the LIP. That means, the Mayor is dictating where money is spent, with the result that there is too much on cycling and pedestrian encouragement and too little on improving the road network for other users.

Transport for London

Transport for London



Nigel Davies
Executive Director of Environment and Community Services
London Borough of Bromley
Via email

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

07 December 2018

Phone 020 7222 5600
www.tfl.gov.uk

Dear Nigel,

Bromley's draft Local Implementation Plan

Thank you for submitting the London Borough of Bromley's draft Local Implementation Plan (LIP) to TfL for consultation.

London's boroughs play a vital role in delivering the Mayor's Transport Strategy (MTS) and helping to achieve the ambitious target for 80 per cent of all trips in London to be undertaken by active, efficient and sustainable modes of travel by 2041. That is why this third round of LIPs is so important in demonstrating how the MTS will be implemented at a local level across the city.

Colleagues at TfL have reviewed your consultation draft submission. The intention of our assessment is to be constructive in assisting you to achieve approval. I enclose here detailed comments for your consideration ahead of the final draft LIP submission to TfL on 16 February 2019.

Final approval of the LIP will be a matter for the Mayor. There are many elements of the London Borough of Bromley's consultation draft LIP which are welcomed. However, our review has identified a number of matters we consider necessary to be reviewed and strengthened. Addressing these issues in full is required for the London Borough of Bromley's LIP to meet the necessary standard we believe the Mayor would consider adequate for approval, in accordance with the conditions set out in section 146 of the GLA Act (1999).

A summary of our key comments is as follows:

- The draft LIP clearly outlines the borough's intention to facilitate mode shift from car use to walking, cycling and public transport in Bromley. This is welcomed. In particular, the borough's commitment to improving conditions for walking and cycling is welcomed.
- The borough's commitment to the Mayor's Vision Zero aim is welcomed.
- The borough's stated intention to tackle congestion through supporting space-efficient modes of travel in favour of car use is also welcomed.

MAYOR OF LONDON



VAT number 756 2769 90

- A commitment needs to be made in the borough objectives to achieve at least 95 per cent of bus stops in Bromley as wheelchair accessible by 2025 in accordance with the MTS Accessibility Implementation Plan (Figure 20 in the MTS). In addition, the borough is asked to indicate what their longer term target is for the delivery of accessible bus stops in Bromley.
- The borough needs to clarify some of the language used in relation to improving bus reliability via congestion reduction. Namely, the borough needs to clearly indicate how the schemes identified in Figure 17 (pages 91-93 of the draft LIP) will embed improvements to bus services and not be undermined by delivering enhanced capacity for traffic growth. Proposals should deliver improvements aligned to the Healthy Streets Approach and in accordance with Proposal 58 of the MTS put walking, cycling and public transport use at the heart of street network design.
- The borough should commit to move towards parking standards for new development in line with the draft London Plan, once these standards are formally adopted.
- The borough needs to clarify that the "network reliability" sub-programme in the Three-Year Indicative Programme of Investment is about improving bus network reliability and tackling congestion on the road network in Bromley through the delivery of Healthy Streets improvements which facilitate mode shift from car use to reduce traffic.

A list of detailed comments is enclosed in the annex to this letter.

We look forward to continuing to work with the London Borough of Bromley over the coming months as you finalise your LIP. My team will contact your officers to request a follow-up meeting to discuss our feedback. In addition, I request that you write to me confirming receipt of this letter and outline in your reply how you will amend your LIP in response to our comments.

Please do not hesitate to contact us going forward should anything in our response require clarification or if you need any support with the further development of the LIP. The key contacts for the London Borough of Bromley are:

Joseph Phelan, Transport Strategy
Henry Tibihikirra, Network Sponsorship

Yours sincerely



**Annex: Third Local Implementation Plan – Consultation Feedback Form
December 2018**

Borough name: LB Bromley

1. LIP Guidance Requirements

- 1.1. Requirement 1 – Draft LIP follows the template structure and provides a response to all requirements.
- 1.2. No further comments.

2. Objective Setting – Mode Share

- 2.1. The draft LIP clearly outlines the borough's intention to facilitate mode shift from car use in Bromley to walking, cycling and public transport. This is strongly welcomed. In particular, the draft LIP identifies switching short local trips away from car use as a key focus area for the borough. To support this intention, proposals for the development and delivery of strategic cycle routes and complementary local routes, as well as improvements to the street environment for walking are put forward. The borough's commitment to improving conditions for walking and cycling is also strongly welcomed. The borough's detailed ambitions for improved rail connectivity and enhancement of bus provision in Bromley are also acknowledged.
- 2.2. The borough's stated intention to tackle congestion through supporting an increase in space-efficient modes of travel in favour of car use is also strongly welcomed. However, the wording used in relation to tackling congestion could be articulated a little more clearly throughout the LIP. For example, a statement is made on page 23 of the draft LIP that, in the context of growth and limited road space, "limiting any increase in the number of trips made by car (so that the mode share falls) in favour of space efficient modes is essential...". Increasing the sustainable transport mode share and more broadly tackling congestion is not simply about limiting an increase in car trips but providing alternatives that facilitate mode shift for trips currently made by car to walking, cycling and public transport use.

3. Objective Setting – MTS Outcomes

- 3.1. Many of the borough's proposals across the MTS Outcomes are embedded within the commentary on challenges and opportunities. An inclusion of these stated proposals summarised alongside the shorter term local targets and objectives indicated in the borough objectives boxes for each Outcome, would strengthen the quality of the LIP. This has been done for Outcome 5 and a similar approach for the other MTS Outcomes would be beneficial.
- 3.2. *Outcome 1*
 - 3.2.1. The borough's intention to develop and deliver strategic cycle routes, informed by TfL's Strategic Cycling Analysis, as well as develop complementary local routes and enhance cycle parking provision is strongly welcomed. The borough's intention to improve conditions for walking in Bromley through addressing key severance issues and enhancing street environments is also strongly welcomed.
 - 3.2.2. Given the borough's aim for 50% of travel to school trips to be made by active modes, the borough is asked to strengthen their proposals in relation to this. The intention to deliver high quality walking routes to schools is recognised, alongside plans for the delivery of cycle routes and training/education also referenced elsewhere in the draft LIP. However, the borough is asked if their intentions in relation to STARS accreditation and school travel planning could be made clearer under this Outcome.
 - 3.2.3. The borough is asked to give consideration to the use of 'school streets' (timed closures during school pick-up and drop-off) to facilitate mode shift to active modes. This would also support the borough's stated intention to address air quality issues in locations where vulnerable people spend much time.
 - 3.2.4. Additionally, the borough is asked to give consideration to the role of workplace travel planning and engagement with businesses to complement improvements to walking and cycling infrastructure.
- 3.3. *Outcome 2*

- 3.3.1. The borough's commitment to the Mayor's Vision Zero aim is strongly welcomed. The draft LIP demonstrates understanding of a Safe Systems approach and the proposals outlined in relation to 'safe speeds', 'safe behaviours' and 'safe street design' are recognised.
- 3.3.2. In relation to 'safe vehicles', although the draft LIP recognises the importance of safer vehicles such as buses in achieving Vision Zero, the borough is asked to give consideration to measures they can undertake to help support the adoption of safer vehicles in Bromley. For example, promoting a work-related road risk policy to address borough fleets.
- 3.3.3. Moreover, in the commentary under "action on cluster sites" the specific nature of the measures that will be implemented could be made slightly clearer. For example, actions presumably include engineering schemes at high priority junctions.
- 3.3.4. The borough is asked to make a commitment to the robust monitoring of infrastructure schemes, entering them onto TADS.
- 3.4. *Outcome 3*
 - 3.4.1. The borough's stated intention to tackle congestion through supporting an increase in space-efficient modes of travel in favour of car use is strongly welcomed. The recognition that providing "infrastructure that makes space efficient modes an attractive and convenient choice" is necessary in the context of population growth is also strongly welcomed, as is the reference to "appropriate road space reallocation".
 - 3.4.2. The borough's intention to increase car club provision is welcomed, namely the proposal to potentially include car club provision and bike hangers in the context of larger CPZs and parking schemes. However, the borough is asked to strengthen their commitment to this. Car club provision should be linked to a reduction in the availability of private parking, in accordance with Proposal 19 of the MTS.
- 3.5. *Outcome 4*
 - 3.5.1. The borough's intention to focus interventions in locations of highest exceedance or where vulnerable people spend a lot of time, for example schools, is welcomed.

- 3.5.2. The borough is asked to provide further detail in this section on proposals concerning cycle freight and micro-consolidation outlined under Outcome 3. Such measures would support a move towards low emission deliveries in town centres.
- 3.5.3. Additionally, the borough's proposals to support the provision of EV charging infrastructure (including rapid chargers) is welcomed. However, the borough is asked to give consideration to specific proposals to support the conversion of commercial (freight, car club and PHV) fleets to ULEVs, alongside their current proposals for taxis.
- 3.6. *Outcome 5*
- 3.6.1. The borough's aspirations for improvements to public transport connectivity and services in Bromley are acknowledged. The draft LIP clearly recognises the borough's role in supporting mode shift to public transport, in terms of "delivering streets that provide a good whole journey experience" in accordance with Policy 10 of the MTS. The proposals and objectives for the delivery of new or upgraded cycle infrastructure for station access, as well as cycle parking upgrades and secure cycle hubs at stations are welcomed.
- 3.6.2. No further comments.
- 3.7. *Outcome 6*
- 3.7.1. The borough's intention to improve station and bus stop accessibility in Bromley is recognised.
- 3.7.2. **However, a commitment needs to be made in the borough objectives to achieve at least 95 per cent of bus stops in Bromley as wheelchair accessible by 2025 in accordance with the MTS Accessibility Implementation Plan (Figure 20 in the MTS).** The Equalities Act (2010) places a duty on both public transport operators and highway authorities to provide reasonable adjustments so that disabled passengers are not disadvantaged. Providing access between a low-floor bus (fitted with ramps) and the footway is crucial to fulfilling these duties.

3.7.3. **In addition, the borough is asked to indicate what their longer term target is for the delivery of accessible bus stops in Bromley. It would be beneficial to outline the current percentage of bus stops in Bromley which are accessible.**

3.8. *Outcome 7*

3.8.1. The borough's intention to improve the efficiency and reliability of the bus network in Bromley is welcomed.

3.8.2. **However, the borough needs to clarify some of the language used in relation to improving bus reliability via congestion reduction. Namely, the borough needs to clearly indicate how the schemes identified in Figure 17 (pages 91-93 of the draft LIP) will embed improvements to bus services and not be undermined by delivering enhanced capacity for traffic growth. Proposals should deliver improvements aligned to the Healthy Streets Approach and in accordance with Proposal 58 of the MTS put walking, cycling and public transport use at the heart of street network design.**

3.8.3. The borough is asked to articulate their intentions in relation to the extension of bus lane operating hours more explicitly.

3.9. *Outcomes 8 and 9*

3.9.1. The objectives and proposals outlined in the draft LIP demonstrate the borough's intention to support growth in Bromley through the promotion of walking, cycling and public transport use in favour of car dependency. Proposals to support sustainable growth in Bromley Town Centre, a key growth area in the borough, are identified. The borough's intention to "secure high quality cycle parking" in new developments is welcomed.

3.9.2. **However, the borough needs to provide more detail in this section. This would draw on proposals elsewhere in the LIP but with a specific focus on how reduced car use and ownership will be supported in the context of new development.**

3.9.3. There is no reference in the draft LIP to parking specifically in the context of new development. The borough needs to make a commitment to support car-free and car-lite development in the more connected locations in the borough. **In particular, the borough should commit to**

move towards parking standards for new development in line with the draft London Plan, once these standards are formally adopted.

- 3.9.4. It is stated on page 98 of the draft LIP that “developments will need to incorporate or contribute to improvements to the highway network including traffic management measures...”. The borough needs to clarify the nature of these improvements and clearly demonstrate that they are aligned to the Healthy Streets Approach and will not provide enhanced capacity for traffic growth.
- 3.9.5. In the commentary provided under Outcome 3, it is stated that “for larger developments that have sufficient units to support a Car club vehicle, developers may be required by an enforceable planning condition to provide a Car Club service...”. The borough is asked to clearly link this to a reduction in parking provision in new developments.

4. Borough Targets

- 4.1. The borough is asked to provide confirmation that the local targets set in Table ST07 are, as appropriate, consistent numerically with achievement of the Outcome indicator targets set in Table ST08.
- 4.2. *Outcome 2*
- 4.2.1. The borough’s reason for setting all their KSI reduction targets against a back-casted 2010-14 baseline (for the purpose of clarity) is understood.
- 4.2.2. However, the borough is asked to reference the MTS 2022 and 2030 Vision Zero targets (a 65% reduction in KSIs against 2005-09 levels and a 70% reduction in KSIs against 2010-14 levels respectively) and provide a comparison with their back-casted trajectory in Figure 14. This would enable more detailed explanation to be provided on why the KSI reduction trajectory in Figure 14 has been adopted and how this compares to the MTS trajectory. Any deviation from the MTS trajectory could then be clearly explained.
- 4.2.3. The text in the borough objectives box on page 55 refers to KSI target figures which have not been back-casted whereas back-casted figures are referred to in Table ST08. The borough is asked to clarify this.

- 4.2.4. No target for 2041 has been set for Outcome 2 in Table ST08. The borough is asked to set a target of 0 KSIs in 2041 in this table in accordance with their stated commitment to Vision Zero.
- 4.2.5. Following the moves to new collision reporting systems – the Case Overview and Preparation Application (COPA) for the Metropolitan Police Service and Collision Reporting And Sharing (CRASH) for the City of London Police – we have now completed initial back estimates for the number of people killed or seriously injured (KSI) for each borough between 2005 and 2017 (contained in the 2017 ‘Casualties in Greater London’ factsheet, available on the TfL website alongside supporting data tables at: <https://tfl.gov.uk/corporate/safety-and-security/road-safety>).
- 4.2.6. We will issue a revised set of borough trajectories for Outcome 2 and Vision Zero and need boroughs to update their targets to reflect these new trajectories in their final LIP for 2022 and 2030 (2041 is unchanged at 0). The level of ambition remains unchanged, despite these revised figures. The borough is also asked to include the following text in the final LIP under Outcome 2 explaining the reasoning for the change in trajectories and targets:

‘The Metropolitan Police Service (MPS) introduced a new collision reporting system in November 2016 - the Case Overview and Preparation Application (COPA). The City of London Police also moved to the Collision Reporting And SHaring (CRASH) system in October 2015. This has had a number of impacts on the data that is available to Transport for London (TfL), and the London Boroughs in the ACCSTATS database for collision investigation.

Under the new systems officers use an ‘injury-based assessment’ in line with DfT STATS 20 guidance and online self reporting is available. Both of these changes are expected to provide a better assessment of injury occurrence and severity but have made data collected from November 2016 onwards difficult to compare with earlier data.

TfL commissioned the Transport Research Laboratory (TRL) to undertake a back-casting exercise to enable pre November 2016 data to be compared with post November 2016 data. These initial back cast estimates include the number of people killed or seriously injured (KSI)

for each borough between 2005 and 2017 and this data has been used to update borough targets to align with those contained in the Mayor's Transport Strategy, namely a 65 percent reduction in KSIs by 2022 against the 2005-09 baseline, a 70 percent reduction in KSIs by 2030 against the 2010-14 baseline and zero KSIs by 2041. The targets contained in this final version of our LIP have been set against Outcome 2 for Vision Zero to reflect the reporting changes. The level of ambition remains unchanged, despite these revised figures.'

4.3. Outcome 5

4.3.1. The borough should make it clear that the values listed are '000s.

5. Delivery Plan – Longer Term Interventions to 2041

5.1. As stated previously in comments on Outcome 7, the borough needs to clarify the language used in relation to proposals to improve bus reliability. It should be made clear how schemes, such as "Keston Mark junction improvements" and "Chislehurst bus reliability scheme", will embed improvements to bus services (in accordance with the Healthy Streets Approach and Proposal 58 of the MTS) and not be undermined by delivering enhanced capacity for traffic growth.

6. Delivery Plan – Three-Year Indicative Programme of Investment

6.1. In accordance with previously stated comments, the borough needs to make clear that the "network reliability" sub-programme is about improving bus network reliability and tackling congestion on the road network in Bromley through the delivery of Healthy Streets improvements which facilitate mode shift from car use to reduce traffic (for example via the Liveable Neighbourhood bid). Some of the language used in this section of the draft LIP requires clarification, in particular the reference to "smoothing traffic flow at key pinch points to improve reliability of bus routes". As stated previously, it should be made clear that bus reliability schemes will embed improvements to bus services (in accordance with the Healthy Streets Approach and Proposal 58 of the MTS) and not be undermined by delivering enhanced capacity for traffic growth.

- 6.2. The borough is asked to provide more scheme-specific detail (e.g. locations and timeframes) in the supporting commentary to the Three-Year Indicative Programme of Investment.

7. Delivery Plan – Annual Programme

- 7.1. The comments already articulated in relation to the “network reliability” sub-programme are also applicable to the Annual Programme.
- 7.2. Comments on the Annual Programme (Proforma A) will be provided separately via the borough’s Network Sponsorship contact.

Response from LB Croydon

Thank you for inviting us to respond on your draft LIP3 document. The comments from the London Borough of Croydon are outlined below:

Parking

Croydon recognises the need to amend and introduce controlled parking areas (CPZs) based upon demand. We would seek early engagement and consultation on any proposed CPZs in the vicinity of the borough boundary so we can cooperate to ensure there are no negative impacts or overspill onto Croydon's roads and if necessary coordinate the implementation of parking controls.

Public transport connectivity

Croydon agrees that orbital public transport in Outer London is inadequate and compares poorly with car travel. As an example, a journey between Croydon and Bromley town centres takes almost twice as long by public transport than driving a car. Croydon looks forward to working with Bromley and other partners such as the South London Partnership (SLP) to improve orbital public transport connections in South London, especially on corridors between our Metropolitan Town Centres.

Croydon notes the proposals for the Biggin Hill Airport Strategic Outer London Development Centre and would welcome discussions on how public transport connections between New Addington and Biggin Hill can be improved as part of any development, for example is there potential to extend Tramlink from New Addington to Biggin Hill?

Buses

Croydon is working with TfL to undertake a comprehensive review of bus services in the north and south of the borough to improve public transport services. We would welcome working with Bromley in order to maximise the benefits to both boroughs and ensure buy-in from TfL to improve services between Bromley and Croydon. Additionally Croydon is promoting the development of more flexible demand-responsive bus services in the southern suburban areas of the borough and would welcome coordination and joint working with Bromley on any cross boundary routes.

Connected and Autonomous Vehicles (CAVs)

Croydon continues to work in partnership with TfL, Bromley and FiveAI on the Streetwise CAV project to pilot this new innovative transport technology with the objective of improving public transport accessibility in lower density areas of the borough.

Tramlink

Croydon continues to lobby for the tram extension to Crystal Palace and we see this transport project as a key way to improving transport services in this part of the borough whilst also enabling significant capacity increases across the Tramlink network. We also continue to seek delivery of the package of improvements identified in the Trams for Growth Strategy in full. Croydon will be funding a significant proportion of these works through the Croydon Growth Zone funding framework. Croydon welcomes Bromley's support for the tram extension to Crystal Palace, Elmers End second platform and double tracking.

Croydon looks forward to working in partnership with Bromley to expand and improve the Tramlink network to accommodate continued growth across South London.

Rail metroisation

Whilst Croydon welcomes the proposed Metroisation of the South London Suburban railway network we believe it cannot be achieved without the delivery of the Brighton Mainline Upgrade, specifically the work to untangle the Selhurst Triangle bottleneck and the reconstruction of East Croydon Station. We feel that this fact has not been successfully communicated and as such it is not yet fully recognised as the most significant current transport infrastructure project benefiting South London and the communities of the South Coast and we would ask all South London boroughs to offer their support for the delivery of this scheme.

Cycling & quietways

Croydon is also considering the introduction of an electric bike hire scheme and would welcome working together with Bromley to identify efficiencies of scale and share knowledge and resources to support the delivery of a scheme in both boroughs.

Croydon looks forward to continuing to work with TfL and Bromley to successfully develop and implement a cycling Quietway routes between Bromley and Croydon, including:

- Kent House to Norwood Junction
- Quietway 7 (Elephant & Castle to Crystal Palace) – Croydon would welcome discussions as to how this route might also be extended into Croydon and link up with our town centre (Growth Zone).
- NCN21
- West Wickham to Croydon town centre
- Elmers End to Croydon town centre

20mph and Vision Zero

Croydon is considering implementing 20mph speed limits on the Croydon roads making up the Crystal Palace Triangle to reduce speeding, increase active travel and reduce collisions. To ensure consistency of speed limits we would like to work with Bromley to introduce a 20mph limit on Church Road, a boundary road controlled by Bromley that makes up one side of the Crystal Palace Triangle.

Traffic reduction

Croydon would welcome discussions with Bromley on how traffic reduction strategies might be secured as a way of funding the delivery of new public transport infrastructure between our boroughs.

Construction, freight and logistics

Croydon is seeking to partner with Bromley and other south London boroughs to submit a pan-borough Mayor's Air Quality Fund (maqf) bid for the development of a Construction Consolidation Centre (CCC) in the vicinity of the A23 Purley Way corridor to reduce construction related logistics and HGV traffic. We look forward to working with Bromley on these proposals. Croydon is already planning other freight consolidation and an area-wide delivery and servicing plan for the Croydon Growth Zone and would welcome partnering with Bromley on any cross boundary work.

I hope the above comments are helpful and look forward to further discussions on how our boroughs can cooperate and work together in the future.

Response from Kent County Council

Introduction

Kent County Council (KCC) has 81 elected Members representing approximately 1.5 million residents in Kent and have recently adopted our own new transport strategy – Local Transport Plan 4: Delivering Growth without Gridlock 2016 – 2031 (July 2017).

Like Bromley, Kent has ambitious targets for housing and economic growth. The emerging Kent and Medway Growth and Infrastructure Framework (GIF, 2018) is currently forecasting a population increase of 396,300 in Kent between 2011 and 2031, requiring 178,600 new homes over the same period. The GIF highlights the necessary infrastructure required to support this level of growth, including its cost, and the funding gap is in excess of £3 billion. We are now in the process of reviewing this work and looking further forward to 2050, including innovation in the way we deliver infrastructure. KCC would welcome the involvement of the London Borough of Bromley to collaborate with us on this important work around future-proofing transport.

Within London Boroughs such as Bromley it is often not possible to rely on the private car solely and so other modes of transportation are prioritised that make more efficient use of the space available, such as walking, cycling, public transport and car-sharing schemes. However, outside of London the private car is likely to remain the dominant mode of transport.

Outlined below are KCC's comments on Bromley's LIP3:

Rail

KCC is supportive in principle of the proposal for a new direct rail service between Bromley South and Ebbsfleet International, but this would be dependent on the provision of third party funding to support the delivery of the required infrastructure for the approach to the terminus at Ebbsfleet, and also on the support of the Department for Transport for the inclusion of such a service in the Train Service Requirement for any future franchise operator.

KCC do not support the Mayor's aim "to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor." Conversely, we support the decision to retain the Metro services within the new South Eastern franchise, and we will work with the Department for Transport (DfT) to ensure improved Metro services to Dartford, Gravesend and Sevenoaks. Therefore, KCC accepts the scope of the forthcoming franchise as settled following the Secretary of State's decision not to transfer the South Eastern Metro services to TfL.

Freight

KCC agrees that the movement of freight and servicing have positive impacts on the economy. The freight and servicing proposals set out within the LIP3 seem reasoned and well thought out.

Cycling

KCC would ask that any proposed cycling schemes on Bromley's eastern border are integrated with the Sevenoaks Cycling Strategy to allow cycle networks to have cross border benefits.

DRAFT

Political stakeholders

Response from Bromley Labour Group.

Location	Comment
P 21 Public Transport	We believe it is really important to improve bus services in the south of the borough, particularly at evenings and weekends to make the use of buses an attractive alternative to car use. Improvements in bus services will also promote mode shift for travel to school.
P 24 Changing the Travel Mix	Add a sentence to the para above table 4 stating that we will encourage schools to run “anti idling” campaigns to encourage those parents who do drive their children to and from school to switch off their engines when parked, so as not to pollute the air breathed by their children and residents living close to schools.
P28 School mode share target	We would like to see more ambitious targets for public transport and active travel to schools. Based on fig 4 on p24, 50% active and 25% by public transport would appear to be achievable.
P34 Building a Cycle Network	<p>We strongly support the development of a cycle network, particularly high quality routes such as quietways. We are particularly supportive of extensions to beyond the Borough boundary to improve connectivity across London, particularly the extension of Quietway 7 into Crystal Place and the Greenwich to Kent House Quietway to the London Borough of Croydon.</p> <p>We will also strongly support investment in the Catford to Bromley & Farnborough (A21) corridor, with junction improvements to allow safe segregated access to Bromley Town Centre.</p>
P 44 Local Neighbourhood Schemes	<p>We support the Shortlands scheme, particularly its integration with the Lower Sydenham to Bromley quietway.</p> <p>We also support bidding to the Good Growth Fund for development funding for improvements to the Elmers End gyratory and in Mottingham. It would be helpful for something more specific to be included in respect of the Mottingham proposal.</p>
P 46 Communities	Please add the Big Lunch to “Royal Weddings or Jubilees” as events when road closures for street parties will be free of charge.

Location	Comment
P 50 KSI v mode	This figure really makes the point that we need to work hard on improving safety for both pedal cycles and motorcycles.
P 51 Action on Cluster Sites	Add “10 or more non injury collisions over 3 years” to the criteria for examining sites for common patterns between the collisions.
P 51 Safe Speeds	<p>We support a targeted approach to the introduction of 20 mph limits. We believe that proposals should be developed for the introduction of 20 mph zones in the town centres identified in the map on page 18. We believe that Beckenham High Street, where a major improvement scheme has recently been completed, would be an ideal street to begin this programme.</p> <p>We also believe that a programme should be initiated to implement a 20 mph speed limit outside every school and park / play area entrance in the Borough.</p>
P 51	Add, in response to community concerns about speeding, we will encourage participation in the “Community Roadwatch” scheme being run by TfL and the Metropolitan Police.
P 58 Car Clubs	We support the expansion of car clubs and would like to see electric vehicles become part of this infrastructure.
P 59 Parking	We support a review of the Borough’s parking strategy. We would like to see a more flexible charging regime introduced for CPZs, with increased charges for second and subsequent cars in the same household.
P 59 Freight	We support the proposed work to reduce the impact of freight deliveries on congestion and the environment. We would like to see the town centres identified in the map on page 18 being “access only” for HGVs as far as practical.
P64 Air Quality (final para)	We support initiatives to reduce the impact of air pollution. Add children’s play areas to locations where vulnerable people may spend significant amounts of time.
P 70 EV Charging Infrastructure	We support the implementation of on street charging in areas where residents have shown an interest in obtaining electric vehicles, particularly in areas where there is little or no off street parking.

P 77 New Connectivity	In response to the high level of public support for the Bakerloo extension in wards along the Hayes line in the 2015 public consultation, we support the eventual extension of the Bakerloo Line from Lewisham to Beckenham Junction & Hayes. (Ward level data received from TFL is attached).
P 77 Trams	We support improving links to Crystal Palace in support of the proposed regeneration of Crystal Palace Park. We would be happy to be involved in the proposed work to determine the best option.

DRAFT

Response from Orpington Constituency Labour Party

Following a discussion at our Constituency Labour Party meeting on 28 November, I am writing with comments in response to your consultation, as we were invited to do by Councillor Ian Dunn. I have also completed the online questionnaire on the subject.

Firstly, we thank the council for your work in producing the report. However, we felt that the document lacked much substance, especially given its very long length. Since there was little in it that was specific, there was little to object to, and therefore we broadly support the report, but we would have liked to see more commitment to the following ideas:

- The focus on cycling and travel on foot is welcomed. However, cycle routes need to be design with safety in mind. A white line in the road does not provide safety for cyclists.
- With this in mind, traffic should be limited to speeds of 20 mph where appropriate, although the meeting acknowledged that this limit cannot be enforced by police at present. A reduction in the speed limit could be implemented straight away and would incur minimal costs.
- In addition, there is desperate need for more pedestrian crossings on the stretch of road (Crofton Road, Crofton Lane and Towncourt Lane) between Orpington Station and Petts Wood in order to protect and encourage pedestrians. There are other especially dangerous spots in Petts Wood, such as at the junction between St John's Road, Tudor Way and Fairway, that also require safety improvements for those on foot.
- Though we welcome the suggestion that bus services should be improved in potential 'leisure areas' such as Downe and Biggin Hill, there are issues with bus services not running on Sundays throughout Orpington.
- There is a need to look at school admissions policies and restrict parking around schools in order to achieve a reduction in pollution levels.
- We were pleased to see addressed the issue of public transport services to local hospitals. However, parking around the Princess Royal University Hospital needs to be considered. Provision is very poor considering and scale of the hospital. Any further development in the area will cause traffic gridlock unless more parking is provided.
- We are strongly supportive of the introduction of step-free access to train stations throughout the borough.

We hope that our comments are helpful and look forward to seeing improvements in local transport provision in the coming months and years.

Residents' Associations and Groups

Response from Ashfield Lane Road Safety Group

This document is the submission of the Ashfield Lane Road Safety Group to Bromley Council's public consultation on their Draft Third Local Implementation Plan, November 2018 ("LIP3").

Ashfield Lane Road Safety Group

We are a group of 71 households living on or close to Ashfield Lane, Chislehurst, who have joined together to campaign for road safety measures on Ashfield Lane. The road links Chislehurst Village to the A222 at Perry Street and is a dangerous road for pedestrians and drivers, due to vehicles constantly speeding at well in excess of the legal 30mph limit.

Our group have spent many months calling on Bromley Council to reduce the road safety dangers on Ashfield Lane, where there have been numerous road incidents and near misses. The road has a 30mph speed limit and yet every day we experience dangerous driving by vehicles exceeding that limit, with at times, speeds of up to 50mph. There are a number of side roads exiting onto Ashfield Lane with very limited or no sight line for traffic joining Ashfield Lane. The high traffic speeds make this particularly dangerous. The blind junction of Heathfield Lane and Ashfield Lane is a particular problem and the Council have acknowledged this, installing hatch markings and a vehicle activated 30mph sign (VAS) on Heathfield Lane since the Ashfield Lane Road Safety Group began campaigning. There is also a VAS at the junction of Ashfield Lane with Kemnal Road, where there have been a number of road accidents. Unfortunately drivers still ignore each VAS, continuing to speed even when the signs have been activated.

Along one side of Ashfield Lane is the open land of Chislehurst Common, including the beauty spot of Rush Pond which is frequently visited by families with small children. These visitors need to park on side roads on the far side of the road and cross Ashfield Lane to access the woodlands and pond. The Commons are very popular with a great many pedestrians and walkers. The road has three multi-residences for the elderly and others on adjacent roads. Pedestrians using the Ashfield Lane footways are therefore in a wide age range, from very young to the very elderly. Despite all this pedestrian traffic, Ashfield Lane has no pedestrian refuges or crossing points at all and a lack of continuous pavements. Crossing the road here, in any direction, is extremely dangerous.

Ashfield Lane is the only route for many school children walking to the many local schools, both primary and secondary.

Bromley Council's Draft Third Local Implementation Plan, November 2018 ("LIP3")

Bromley Council's commitment, through their LIP3, to improve safety, reduce road danger and enhance public transport, pedestrian and cycle networks is to be

applauded. It is good to read the comments by the Portfolio Holder in his introduction:

“Through this LIP we are reaffirming our drive to reduce those being killed and seriously injured on our roads with an ambition to reduce this to zero by 2041”.

The Ashfield Lane Road Safety Group are pleased that LIP3 promotes a healthier Bromley and places such importance on delivering objectives such as an attractive walking and cycling infrastructure, where residents will be encouraged to take more exercise by not driving for shorter journeys.

Outcome 1 – Borough objectives

Walking to school

Page 24 states that 25% of peak hour traffic is associated with the school run. It also comments on page 41, *“the current street network can sometimes make walking a hostile and intimidating experience that discourages people from walking, including children being allowed to travel independently to school.”* Also, *“to unlock the potential for walking it is important to create an environment that encourages people to walk and feeling safe and secure is an important element of that.”*

We completely concur that it can feel intimidating to walk along and cross Ashfield Lane. Residents are more likely to drive their children to school than risk attempting to cross busy traffic on Ashfield Lane. If the Borough is to encourage walking to school then it must make physical changes here that permanently change drivers' illegal driving habits to make our road safer for children, their parents and all other pedestrians.

Ashfield Lane Road Safety Group is particularly concerned about the local children who walk to school alone and have great difficulty crossing Ashfield Lane. We are glad to see that LIP3 promotes the provision of high quality routes with crossing facilities on busy roads:

Page 43

“The Borough will work with schools who are accredited under the STARS system to understand the key barriers children face walking to school and reasons why parents/guardians do not allow them to do so, in order to inform improvements to key walking routes to schools. Providing high quality routes with crossing facilities on busy roads will permit a greater level of independence for children and reduce issues associated with school pick up and drop off such as congestion and inconsiderate parking near schools. Work with schools to encourage walking as part of an active lifestyle is particularly important and will aim to ensure that when children reach adulthood they continue to choose active transport modes rather than migrate to car journeys.”

The Borough estimates around 40% of children are driven to school and that this impacts on the reliability of the bus network. It states on page 62 under Outcome 3 – Borough Objectives, its aim for 50% of “travel to school” trips to be by active modes and 20% by public transport by 2021/22.

The Ashfield Lane Road Safety Group suggest that physical changes are made to the junctions on Ashfield Lane, which will calm the traffic speeds and that safe crossings are provided, with a 20mph speed limit, to encourage more school children

to walk/to be walked to the many schools in the surrounding area. This would also meet with the Council's aim to promote healthy lifestyles in our young people.

Provision for disabled residents

We are pleased that LIP3 also provides protection for the disabled by aiming to remove clutter from the footway and to introduce new crossing facilities. Disabled residents are currently unable to negotiate all the Ashfield Lane footways as not all have a drop kerb. Residents using mobility scooters have been forced to drive in the roadway, which is especially dangerous given the high speeds:

Page 43

“Another small intervention that the Borough has successfully undertaken in the past and will continue to do is to remove unnecessary clutter, and consolidate new highway equipment as it is installed, this will be particularly important with the installation of EV infrastructure creating access impediments on footways. These small measures should be incorporated into all transport schemes where feasible and it will be necessary to consider how schemes can make environments suitable for independent travel for those with visual impairments and other disabilities. The Borough will also seek to identify key severance issues that prevent people from walking and seek to address them with the introduction of new crossing facilities.”

Pedestrians in general

Whilst Bromley's target is for 60% of trips to be made by public transport, walking and cycling by 2041, it is however disappointing that the shorter term mode share target for 2021 is for 47%, only 1% higher than the present 46%.

We believe by making roads such as Ashfield Lane more favourable for walking and cycling this will encourage more residents to make more active travel decisions.

Cycling

We note the Borough's intention to promote cycling, including an orbital cycle network and local routes (page 31).

We believe a 20mph speed limit within Chislehurst Commons and on Ashfield Lane would help promote cycling to residents as alternative active travel on shorter journeys which are currently undertaken by car.

Outcome 2 – London's streets will be safe and secure

We welcome the Borough's intention to greatly reduce the number of KSIs, with particular reference to the LIP3 quote of the slight increase in KSIs since 2014, despite previous decreases:

Page 48

“Reducing casualties is central to Bromley's transport priorities. The Borough has a good record of improving road safety and has focused its efforts in recent years on reducing the numbers of those killed and seriously injured through a programme of treating a number of collision hot spots and successfully delivering a road safety education programme. This has led to significant decreases in KSIs from 1999

although unfortunately as with much of London, since 2014 KSIs have exhibited some small increases, in the context of a growing population.”

We note and welcome the understanding of residents' fears of road dangers on roads such as Ashfield Lane:

Page 50

“It is also important to recognise that there are locations where road danger, real or perceived, is supressing demand for active travel, thereby reducing accessibility for those without cars and forcing those who would otherwise walk or cycle into cars, contributing further to congestion and poor air quality. Whilst tackling sites with poor collision records will remain the priority for investment, the severance caused by fears of road danger will be tackled through walking and cycling investment programmes that seek to deliver mode shift.”

Budget limitations

As the Ashfield Lane Road Safety Group has been told by Ward Councillors that there are no budgetary reasons for a lack of action on Ashfield Lane we were surprised to read of limited resources available:

Page 51

“Action on cluster sites

With limited resources even for an absolute priority such as improving road safety and reducing those killed and seriously injured on the Borough's roads, prioritisation of remedial schemes must take place to deliver the greatest benefit and quickest reductions towards Vision Zero.”

“Where there are limited funds available to carry out interventions, schemes have to be prioritised using a cost benefit analysis, with a higher weighting given to collisions that led to serious or fatal injuries.”

The Ashfield Lane Road Safety Group believes the small expense of changes to Ashfield Lane would reap savings and save lives in the long term.

Safe speeds

We are pleased to see LIP3 promote safer speeds as vital to road safety:

Page 51

“the Borough will use targeted measures at identified hot spots to reduce speeds.”

20mph speed limits and zones

Ashfield Lane Road Safety Group is most definitely a hot spot for speeding and we continue to press for traffic calming measures to be introduced, particularly a 20mph speed limit. Cyclists mix with general traffic on Ashfield Lane, traffic which is constantly travelling in far excess of the legal speed limit. We would like the Borough to consider Ashfield Lane in regard to the following:

Page 52

“The Borough will therefore adopt a targeted approach to the introduction of 20mph speed limits or advisory limits, focusing on the areas around schools, key walking routes to schools, areas with high pedestrian footfall, e.g., outside railway stations, and high streets/district centres where a lower speed limit will allow for improved public realm, thereby also supporting Borough strategic ambitions for Vibrant Thriving Town Centres. Additionally, 20mph limits will be considered on cycle routes where cyclists mix with general traffic and where benefits to safety can be derived. As compliance is essential, wherever they are introduced, this will normally be introduced alongside changes to street design that will result in also making them less traffic dominated and more attractive places to walk and spend time which, e.g., may include new crossing facilities, tree planting and better managed parking. These schemes may form part of the larger area based schemes referred to in Outcome 1.”

Approach from residents concerned about speeding and rat running

Members of the Ashfield Lane Road Safety Group have, in unison and as individual householders, repeatedly asked the Borough for traffic calming measures to stop speeding and rat running on Ashfield Lane. We are pleased the Borough is keen to promote the use of safe speeds but we believe that more should be done to alleviate the real dangers experienced by residents, reasonable drivers and pedestrians on Ashfield Lane and surrounding roads:

Page 52

“Local neighbourhood/ corridor based schemes

Residents frequently approach the council with concerns about speeding and rat running. In isolation it is difficult to solve the issue without simply moving the problem to an adjacent street. However concerns about the danger presented by the perception of speeding and rat running traffic through residential areas are important factors in mode choice. Therefore promoting area wide schemes to remove dangerous rat running and promote the use of safe speeds presents an important opportunity to facilitate walking and cycling for local trips especially to schools as well as to improve the public realm. This can be delivered through innovative designs and streetscape improvements as part of local neighbourhood schemes potentially including modal filtering. Such schemes will need to be developed with communities to ensure that they are locally appropriate and serve the residents of the area they are intended to benefit. Promotion of lower appropriate speeds around such areas will also help reduce the severity of any collisions which do occur.”

This is the completion of the Ashfield Lane Road Safety Group submission to Bromley Borough’s Draft Third Local Implementation Plan, November 2018 (“LIP3”).

Response from the Chislehurst Society

The Chislehurst Society supports measures which provide transport choices, alternatives to car travel, thereby reducing pollution and preserving our environment.

The Society encourages education programmes to influence driver behaviour along with support for Walk to School initiatives such as that seen most recently in the Bullers Wood School for Boys campaign.

We support the enhancement of electric vehicle infrastructure and the greening of buses.

The Society wants to see an accessible rail network for disabled passengers and improved access for passengers using bicycles to access railway stations. Members were recently encouraged to vote for local stations that could immediately benefit from Access for All funding to upgrade facilities at Chislehurst, Elmstead Woods and additionally Petts Wood which is used by several of our members.

The proposed local cycle network from St Paul's Cray through Chislehurst to Sidcup would be encouraged if supported by safe speed measures along the route. There is more than sufficient support in Chislehurst to justify a request for the L B of Bromley to re-evaluate the proposition of a borough wide speed restriction.

We seek to preserve the Conservation Area, protecting and enhancing the character of Chislehurst. The impact of possible street signage re-enforcing speed limits would have to be evaluated to assess the impact on the look and feel of the village which has been a key focus for some time.

Specifically, The Society requests investigation into:

- Targeted measures to reduce traffic speeds including such measures as removing centre line markings, increased pedestrian crossings, raised platforms (real or illusionary)
- Improved connection by bus from Elmstead Woods Station to Chislehurst High Street
- A pedestrian crossing at the War Memorial
- Investigating lane widths and bus stop locations at the War Memorial junction
- Communicating discussions and developments around the suggested Chislehurst bus reliability scheme
- Considering traffic modelling and the development of options that will eliminate the collision points at Loop Road and Ashfield Lane and increase the attractiveness of the open space adjoining Chislehurst High Street
- Increasing dropped curbs and maintaining safe pavement surfaces to enhance walking and safe access in busy areas

- Actively encouraging local neighbourhood schemes to encourage walking to schools and to shopping parades, working with the already well-established Chislehurst Business Group and Town Team
- Footpath upgrades to enable safer pedestrian access in and around Chislehurst on adopted and unadopted public highways especially on routes that link residential areas with transport hubs, schools and the facilities in Chislehurst High Street.

DRAFT

Response from Chislehurst Safer Streets

Chislehurst Safer Streets

Asking that those driving in and through Chislehurst do so more slowly and considerately



Contribution to Bromley's Local Implementation Plan 3 consultation, 8 January 2019

Overview:

Concern about traffic speed and road safety in Chislehurst has grown markedly in recent years. Chislehurstians no longer feel any sense of their streets being a shared space. Rather, those streets now feel dominated by traffic. Dominated to the extent that people of all ages are not making many of the pedestrian journeys they could, because they no longer feel safe walking along - let alone trying to cross - many of Chislehurst's roads.

Local parents know they add to the problem by driving their children to school, yet the alternative is not comforting. To cite but two examples:

- some 2,000 children and young people attend St Nicholas CE Primary School and Coopers School. For most, their journey requires a crossing of the A222 or A208, or both, without a single pelican or zebra crossing to help them; while
- the pavement along Heathfield Lane that should serve those walking to Mead Road Infant School has a width of 80cm - nothing like wide enough for a parent and child to go side-by-side.



The school run isn't optional. Other journeys are. Many elderly people report not making journeys by foot to visit old friends they would have taken with alacrity 10 years ago.

The large communities of older residents near Royal Parade and Ashfield Lane are, like everyone else, expected to make it to Chislehurst village without a single regulated crossing for support. Some might ask: what about those island refuges? What about them - they offer no pedestrian right-of-way, nor any true solace if one gets stuck in the middle.

All of these concerns and many others were drawn out by a special consultation the Chislehurst Society ran in November 2018. The key finding of that was:

- 90% of respondents called for a Chislehurst-wide 20mph zone.



A Chislehurst-wide 20mph Zone:

20mph zones are recommended for areas such as Chislehurst by a range of important organisations. Internationally (30km/h): the World Health Organisation; the International Transport Forum of the OECD; and the Global Network for Road Safety Legislators. In this country: the Royal Society for the Prevention of Accidents; the AA; and Transport for London.

43% of Londoners already live in a 20mph zone. Further, a number of London Councils are implementing Borough-wide 20mph zones, including neighbouring Lewisham and Greenwich.

90% of Chislehurstians want that same benefit. Want the same reassurance that drivers will fully respect their home, their lives.

Many of those calling for a Chislehurst-wide 20mph zone do so on instinct, on an intuitive grasp of what feels right.

Many others understand fully well the evidence. They know that the still widely quoted research by the London School of Hygiene and Tropical Medicine (2009) found that the number of people killed or seriously injured falls by 42% in well-designed 20mph zones.

Chislehurstians have also read the very latest studies: by WS Atkins Ltd for the Department for Transport (November 2018); and University of West England of the Bristol city-wide zone - Pilkington *et al* (July 2018).

In summary, what Atkins found is that 20mph zones that are poorly implemented have little appreciable effect on traffic speed or accidents. That may sound like a statement of the obvious, but it is an important point. Atkins' research was focused on 12 zones established without the installation of any physical traffic calming measures or changes to street design. It would be wrong to suggest the local authorities involved had been naive - thinking they could just put up a few 20mph signs and that would do. As a number responding to Atkins pointed out, they had plans in place to reinforce the zones. But what Atkins essentially says is a plan involving 20mph signs first, reinforcing measures later, risks failure.

And yet, even in the 12 authorities Atkins studied people remained overwhelmingly positive about their zone.

They wanted to make it work: 75% of residents and 66% of non-resident drivers continued to support the policy; whereas only 12% of residents and 21% of non-resident drivers wanted to revert to 30mph.

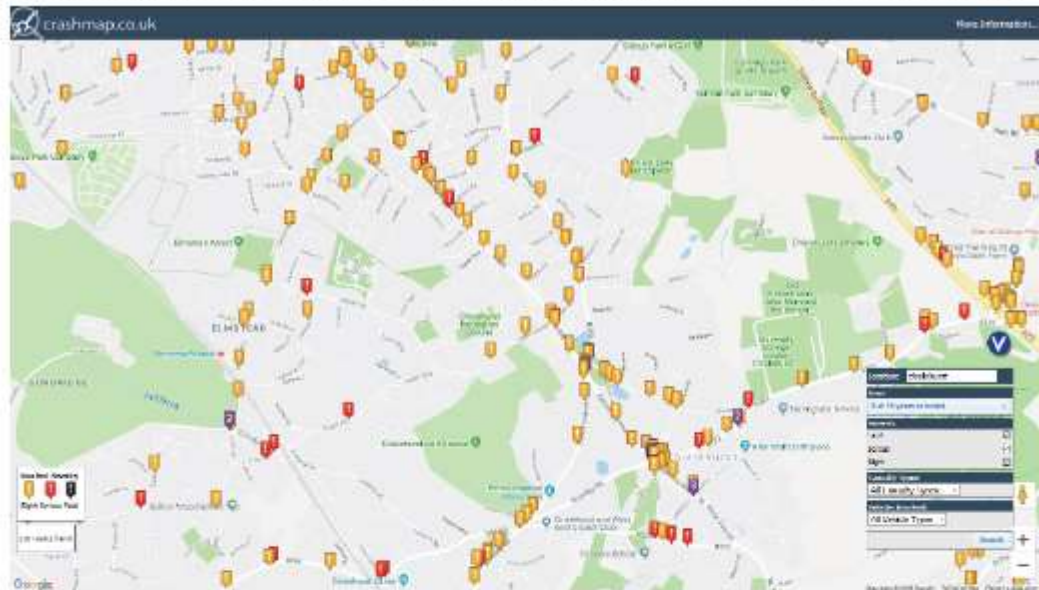
The UWE study compared traffic speeds and accidents before and after the roll-out of a 20mph zone that includes a variety of reinforcing measures. The findings were clear:

- average traffic speeds were reduced on 100 of 106 roads in the city of Bristol, with the largest reductions occurring on A and B roads;
- bringing the average speed down to 24mph - which is more than 10mph lower than the average experienced in most 30mph zones across the country, a reduction that could be the difference between injury and death in an accident;
- rates of fatal, serious and slight injuries all fell. The estimated total number of injuries now avoided across the city each year is: 5 fatal; 11 serious; and 159 slight; and
- the number of people walking or cycling to school or work has increased year-on-year.

Understanding that latest research, Chislehurstians know that securing improvements to safety on A roads is key to improving safety overall. Across London in the past three years (motorways excluded) 71% of all fatal and 62% of all serious road casualties occurred on these roads.



As the 'crashmap' here (for 2015 to 2017) shows, this is no less true for Chislehurst.



Accordingly, *Chislehurst Safer Streets* calls upon Bromley Council to revise its current policy on area-wide 20mph zones. To bring it in to conformity with the Mayor's strategy and the policies adopted by many other London Boroughs. Because without that the Council's laudable ambition to increase journeys by foot or bicycle is unrealisable.

Immediate action to improve pedestrian safety in Chislehurst:

Planning and implementing the Chislehurst 20mph zone will take a year or two. But the foundations can and should be laid now. *Chislehurst Safer Streets* has identified measures for improving pedestrian safety that we look to the Council to implement as a matter of urgency, so to prepare the way for our 20mph zone. These are:

- a network of new pedestrian crossings;
- raised tables at key junctions and flashing speed warning signs on busy roads; and
- a pelican crossing at the War Memorial.

Pedestrian Crossings:

Presently, Chislehurst, home to more than 20,000 people and visited daily by another 5,000, boasts just 2 zebra crossings.

The case for a significant increase is:

- they are considerably cheaper than pelican crossings; and
- compared to island refuges, infinitely better regarded by pedestrians and drivers alike, because:
 - they give the pedestrian the right of way, which is a massive comfort;
 - yet ask only that the driver wait long enough for the user(s) to cross;
 - meaning they signify an idea of a space shared amicably;
 - with those iconic Belisha beacons acting as a natural corrective to unsafe speed even when no-one is waiting to cross.



A non-exhaustive list for new zebra crossings is:

St Paul's Cray Road by Manor Park	St Paul's Cray Road near Bull Lane
Bromley Lane near Shepherd's Green	Kemnal Road and Ashfield Lane c/roads (x2)
Near The Meadow to Rush Pond	Heathfield Lane to the Commons
Loop Road near the bus stop	Heathfield Lane to Pond Path
Green Lane near Greenway	White Horse Hill near Greenway
Yester Road near Walden Road	Hangman's Corner

Table junctions:

Raised tables at key junctions are a feature of street design in other parts of Bromley, and neighbouring Boroughs (for example, on the Sidcup section of the A222 by The Green). The calming effect of these is to moderate the inevitable competition between different traffic flows at such junctions. *Chislehurst Safer Streets* has identified the following non-exhaustive list of junctions that would benefit from a raised table design:

Perry Street / Ashfield Lane	Ashfield Lane / Kemnal Road crossroads
Ashfield Lane / Heathfield Lane crossroads	Ashfield Lane / Loop Road crossroads
Loop Road / Prince Imperial Road cross-over	Green Lane / Park Road
Bromley Road / Prince Imperial Road	Elmstead Lane / Walden Road

In addition, occasional raised tables - with preceding flashing speed warning signs - should be used to moderate speeds on Chislehurst's busiest secondary routes, most particularly Yester Road and Green Lane.

War Memorial junction:

Local schools and local residents of all ages have long called for the integration of a pelican crossing within the traffic lights at this junction. Indeed, there has effectively been no opposition to this.



Chislehurst Safer Streets understands that recently Councillor Terry confirmed this would now be implemented. We therefore thank him and the Council, and look forward to speedy action to complete the task.

Chislehurst Safer Streets

Asking that those driving in and through Chislehurst do so more slowly and considerately



Response from The Gardens Residents Association

Dear Sirs,

In response to your request for comments.

In order to reduce emissions from standing vehicles and driver tension I would recommend the provision of 'surface painted' lane separation and arrow indication at appropriate junctions throughout the Borough. Examples immediately coming to mind are Scotts Lane/ Bromley Road and Bourne Way/Tie Pigs Lane. This would be a low cost improvement to safety and the environment.

DRAFT

Response from Keston Village Residents' Association

KVRA are aware that LBB are currently (w/c 7th January 2019) measuring the vehicle speed and volumes along Heathfield Road and through Keston Village and the results of this survey work is eagerly anticipated. Residents are confident that the statistics will confirm their long held view that vehicular traffic through the village has increased significantly since the last measurement (01.07.13 to 07.07.13) due largely to the subsequent construction of the roundabout at the junction of the B265 Heathfield Road with the A233 Westerham Road.

Traffic volume through the village in peak periods is now nose-to-tail resulting in pedestrians and drivers taking undue risks in to either cross the road or in the case of vehicles entering Heathfield Road, those seeking to join from side roads.

Despite minor efforts by KVRA/LBB on directional signage for HGV's, residents still witness too many HGV's negotiating the narrow Heathfield Road with consequential pedestrian dangers at the pinch point close to the Post Office and damage to bollards at the mini roundabouts located at the north end of the village. KVRA request LBB acknowledges these long held concerns and ban all HGV's from Heathfield Road.

KVRA support the efforts to reduce car use for parents taking children to school. For this to be effective for pupils of Keston C of E Primary School, it requires;

- Improved bus timetabling of the 146 and 246 buses with greater frequency particularly at peak periods
- Improve associated pavements and pathways
- Install a Zebra Crossing on Heathfield Road
- School management to fully support park and walk protocols

KVRA want the local authority to take these safety concerns with the seriousness they deserve and to take the following actions;

Keston Mark junction of A232 Croydon Road and A233 Westerham Road

KVRA fully support the LBB/TfL plan to improve the Keston Mark junction, as this is fundamental to improving traffic flows, productivity and the lives of many residents in the local area. The junction needs a thorough re-evaluation and re-design to cope with current traffic. The anticipated growth of traffic associated with the Strategic Outer London Development Centre (SOLDC) designation at Biggin Hill will further exacerbate this already critical problem.

In the intervening period before any re-design can be implemented it is necessary to make the following minor but important improvements;

- Improve the sequencing and dwell-time/priority allocated within the traffic light system to pedestrians at the Croydon Road junction with Westerham Road at the Mark. Improve the right turn facilities particularly for traffic turning right and towards the south using Westerham Road.
- To help reduce the number of accidents at this junction review the flow of traffic travelling west on the A232 Croydon Road. Currently at this junction vehicles in the outside lane overtake vehicles in the inside Lane and within meters hit a bottleneck. A solution would be for the outside lane to be 'right turn' only.

Keston Village

The points below are called for by the locals and Keston Village Residents' Association;

- Restrict **vehicle speeds** to 20mph on the B265 along the full length of the Keston Village Conservation Area; from the recently installed 'Welcome to Keston Village...' gate in the south past The Fox and into Commonside as far as the Croydon Road junction in the north. Also restrict vehicle speed to 20mph along Fishponds Road.
- Install a **pedestrian crossing** on Heathfield Road, in particular to make safer access for Keston CE School pupils and their parents. Improve the footpath on Commonside from St Audrey's to Oakfield Lane.
- Create a **traffic-calming measure** - indentation/extension of the pavement into the road on both north and south carriageways of Heathfield Road to emphasise the change in speed limits at both points. Improve pavement configuration with indentation into the carriageway at junction with Keston Avenue and widen the pavement adjacent to the Post Office.

Response from the KRRSG

The Group represents the residents in the Keston area and has been actively involved in trying to make improvements to the local road and path network for the benefit of local residents.

KRRSG welcome the plan and in particular the recognition of the problems of the Keston Mark junction along the A232. The group has previously met with Gareth Bacon, our GLA representative, to lobby for improvements to the junction. He has subsequently carried out a site visit to assess the junction first hand and is aware of our concerns. We note that the programme for improvements is scheduled for 2019-2022. The plan is not specific in terms of the actual improvements which are proposed. We would be grateful if details were made available for further comment. We are of the Strategic Outer London Development Centre study for Biggin Hill which potentially will generate additional traffic, and this must be factored in any improvements to the Keston Mark junction. One of the problems with the junction is the timing and phasing of the traffic lights which results in long queues particularly along the A232. This is exacerbated by the physical restraints of the junction itself with restricted turning particularly turning onto the Westerham Road /Oakley Road. We would like some clarification as to how this aspect of improvements are being considered within the LIP.

KRRSG are pleased that the LIP is considering improvements to the Bromley Common /Oakley Road junction. Again, there are no specific details and the Group would like to be kept informed as to the detailed proposals when available. We consider that local knowledge and experience is a valuable asset in helping to establish workable improvements.

The Keston Village Residents Association has made further representations regarding the speeding issues along Heathfield Road and this Group fully supports them in trying to reduce speeds. There have been recent additional road markings, but we understand that these have made little difference to the vehicle speeds. We feel that further improvements are required. The KVRA have suggested further improvements and we are in agreement with these.

In summary these are

- Restrict speeds to 20mph through the Conservation Area along Heathfield Road and also along Fishponds Road
- Install pedestrian crossing on Heathfield Road to improve pedestrian access to Keston CE School which will help to alleviate the parking problems outside the school.
- Further traffic calming measures along Heathfield Road.

Response from the Penge Forum

Dear Councillor Huntingdon-Thresher

I was very pleased that Bromley Council has carried out a public consultation on its plans to build on its road safety strategy and have participated in that process as a private individual.

I sit on Bromley Council's road safety consultative panel, representing Penge Forum and have copied into this email the Chairman of the Road Safety Consultative Panel, John Harvey, and the Chairman of Penge Forum, Alderman John Getgood, together with Angus Culverwell.

Bromley Borough is not only the largest in terms of geographical area, it also has a very varied collection of communities reflecting its continuing development and these communities live within varied street layouts. All of which, of course, you know, but I thought it might be helpful to send you some supplementary thoughts on what is troubling local residents.

So attached is a commentary (Vision Zero), a breakdown of responses to a short consultation Penge Forum carried out on Penge High Street in November, along with suggestions from respondents on how to improve their safety (and almost as importantly their perception of risk) and a list of worries expressed by Penge Forum members and others that I passed on via the Road Safety Panel at a meeting last year.

A lot of this is encompassed in your consultation, but I would like to suggest a couple of issues not included:

Bromley and TFL have information which our residents could use to help improve road safety. Two items (TFL's customer services contact number for faulty traffic lights and the fact that when traffic lights are taken out of operation their temporary replacements should provide a like for like service) were not known locally when roadworks were carried out in March at the junction of Parish Lane and Green Lane. There may be unknowable knowables, but publicising what we ought to be able to expect from contractors, whether working for Bromley Council or for statutory undertakers would seem to be a sensible step to empowering local residents.

Signage, particularly that used for diversions, remains a puzzle even as we approach the end of the second decade of the 21st century. Not everyone has sat nav. Not every sat nav is up to date. We cannot be the only part of the Borough that would really appreciate better standards of communication, so motorists are not faced late at night by a sign saying "Diversion". "Where to" is the obvious question. And temporary information signs placed among parked vehicles are not as useful as signs attached at eye height to lampposts or similarly useful street furniture. Finally, signage that is timely both in terms of advance notification and in being removed on completion would help reduce stress in motorists and perhaps improve their general driving practice when battling through our narrow Edwardian Streets.

I hope you have time to read the attached documents.

Vision Zero, a Strategy published by London's Mayor on 24th July 2018 which sets out the way ahead for improving road safety in London, states that no deaths or serious injury on London's roads should be treated as acceptable or inevitable. Its proposals include 20mph speed limits within the congestion charging zone and a new bus safety standard. In support of the publication of the strategy Chief Superintendent Colin Wingrove of the Met's Road and Transport Policing Command commented "Excess speed is an undisputed contributor to road collisions in London!"

I have been representing road safety concerns of Penge Forum members on Bromley's Road Safety Panel for three years. Attached is a summary of a short consultation with pedestrians on Penge High Street carried out in November 2018. Both comments from Penge Forum members and from pedestrians on Penge High Street highlight concern about inappropriate speeds on local roads, and bad driving practice, which is making simple activities such as crossing the road unnecessarily unpleasant.

Inappropriate Traffic Speeds

Penge and Anerley roads are surrounded by areas under the control of Local Boroughs who have adopted 20 mph zones. Not every resident of Penge and Anerley supports such zoned controls on speed. Bromley Council has been awaiting the outcome of a survey commissioned by the Department for Transport on the effectiveness of 20mph zones in terms of road safety. This compares a selection of local authorities who use 20mph zones with others who do not. The London Borough selected for the survey does not use 20mph zones.

However we are now split geographically between roads on the south side of Penge High Street which have 20mph speed controls and those on the South side of Penge High Street, equally narrow Edwardian residential roads, which do not.

Congestion at the traffic lights on Penge High Street and at the bottom of Anerley Road has led to numerous alternative routes being used, at in appropriate speeds, such as Thicket Road and Penge Lane, Southey Street and Wordsworth and Raleigh Roads, Kingsdale Road and Torr Road. Residents are advised to note timings and details of regular offenders and to pass the information on to the Traffic Police via our local police station so that patrol cars can be targeted at appropriate times and locations, as and when patrol cars are available.

There are traffic cameras sited locally, equipped with Automatic Number Plate Readers. These pick up stolen vehicles and those which are untaxed etc. They do not detect vehicles which are inarguably putting the lives of local residents at risk by driving at inappropriate speeds.

In addition to putting other road users and pedestrians at risk of injury through accident, driving at excessive speeds and heavy use of brakes adds to air pollution, a major cause of premature death within London.

Bromley's Road Safety Unit works closely with the police and with local councillors to reduce inappropriate speed on our roads, but Vision 20 is an excellent opportunity to consider whether there is now available technology that can help their efforts. Speed cameras, for example, can now be used to enforce 20mph limits. The Highways Agency can install temporary speed cameras on motorways to ensure safe driving in the event of road repairs, so it should be possible to install temporary speed cameras within areas in Penge and Anerley to encourage safe driving, and then to move them on to subsequent areas. With increasing pressure of demand on the Met and ongoing pressure on the Borough's manpower costs, technology could provide 24 hr cover where only a piecemeal approach is currently available.

Bad Driving Practice

Many Penge and Anerley residents walk and cycle to work, to school, to the shops. This fits in well with LBBromley's ambitions for a healthier Bromley. So keeping our pavements safe and our ability to cross the road safely is a high priority.

More publicity about the rules on pavement parking and more enforcement against offenders would not only keep us safer, but save money as fewer kerbs and paving stones would need replacing. Major offenders are delivery van drivers under pressure to meet deadlines. LBBromley should work with other London Boroughs to influence home delivery businesses, from supermarkets to multinationals, to comply with the law.

Congestion at traffic lights encourages pressured motorists to jump amber and red lights, leaving little or no room or time for pedestrians to cross on the green man facility. It is to be hoped that the current requirement for four people to be killed or seriously injured before a traffic light enforcement camera can be installed will be recognised as an outdated and callous requirement. Perhaps a calculation based on pressure of traffic and pedestrian footfall could take its place.

Meeting the Needs of the Differently Abled

There are various parts of Penge and Anerley where it is unnecessarily difficult for wheelchair users to cross the road. For example, where Lennard Road meets Newlands Park there is a dropped kerb for wheelchair users. But the road bends at 90 degrees, and the speed limit is 30mph. Perhaps a good way of assessing suitability of such a facility would be to try it out in a wheelchair first.

Wheelchair users have also reported difficulty in crossing from the north side to the south side of Parish Lane at its junction with Lennard Road. Local residents report that this is also the location of numerous collisions. LBBromley officials have visited

the area but been unable to remedy the problem. As the population ages, however, this type of problem looks likely to increase. Virtual speed bumps have been in use for some time. Could LBBromley urgently look into the possibility of their use in locations where residents have highlighted such risks but so far no remedy has been available.

Dropped, tactile kerbs are also meant to be an aid to visually impaired pavement users. It is imperative that if a tactile dropped kerb is installed, it is also kept in a safe state – no cracked, uneven paving – and that the road surface between the two sides of the road is even, so the person using it is not wrong-footed.

Although TFL is responsible for traffic lights in Penge and Anerley, concern has been expressed about the helpfulness of the type provided locally, particularly taking account of the needs of visually impaired users and people who cannot walk as quickly as the young and fit. Could all traffic lights with pedestrian facilities be equipped with “beepers” and the time allowed for crossing take account of local pedestrians’ needs? This would also benefit parents with walking toddlers.

Empowerment through shared information

Following a fatality locally last year it is clear that there is no accessible information on how to report a faulty traffic light. These are TFL’s responsibility. They should be asked to ensure that a contact point is available on traffic lights so that local residents can report problems.

It is also not widely known that when temporary traffic lights are installed they should provide an equivalent service to the lights they are replacing, so if there is a pedestrian facility normally available with permanent traffic lights, a pedestrian facility should be provided with temporary lights. Any failure to do so should be reported to LBBromley for action.

Local residents are a valuable source of information which could help improve London Boroughs’s road safety, but many do not know how to use that information or access information from their local Borough. LBBromley has an excellent and accessible website (TFL’s is not as helpful) and it regularly leaflets Safer Bromley information to every household. More use of these to get road safety messages and contact information across would empower residents.

Penge Forum Residents' Feedback on Road Safety 3.11.18

(27 people filled in the following survey on Penge High Street on a November Saturday morning)

Bromley Council compares well with other London Boroughs in terms of road safety improvements, but recognises residents' concerns about road safety. So Bromley Council has asked its Environment PDS to review the latest Local Implementation Plan with the target of further road safety improvements.

	Yes/No/NA
Do you agree that road safety needs to be improved in Penge and Cator?	25/1/1
Do you think that local pavements are safe for pedestrians?	8/16/3
Can you cross the road outside your home in safety?	15/12/0
Can you and your children walk and cross the road to school in safety?	3/13/11
Are you happy to cycle on the road in Penge and Cator?	5/14/8
Are you frustrated by lack of information in road work diversion signs?	22/2/3
Do you have suggestions for Bromley Council that will improve road safety locally?	

If yes, please set them out overleaf:

Attached are their views, expressing concern about local speed of traffic, lack of enforcement on speeding and jumping traffic lights and about the needs of mobility scooter users, and whether pedestrian lights are giving enough time for the most vulnerable members of our community to cross local roads. A further suggestion for improvement is to improve signage on temporary road diversions so that motorists can more easily chart their ways to their destinations.

Do you have suggestions for Bromley Council that will improve road safety locally?

20 mph on main roads (like Anerley Road) and effective enforcement

Elderly people not catered for

Simplify the double roundabouts at the junction of Kings Hall Road, Parish Lane and Kent House Road to a single roundabout. Cars already drive over, so not an additional consideration in this case.

High Street Penge (new layout) – more white lines equidistant in both directions and increase green man crossing time.

Library in Green Lane has no barriers outside its main doors to stop children and vehicles colliding.

New surface in entrance to Blenheim Centre is slippery when wet.

Mobility scooters cannot get up and down from pavements easily.

Motorists already jumping lights on Penge High Street, but due to new layout pedestrians cannot see them approaching.

Why no traffic enforcement cameras at lights?

Why no 20mph speed limits north of Penge High Street (eg Wordsworth Road and Raleigh Road)

Southey Street cut-through from Penge High Street should not be 30mph limit.

Cut the speed limit – all residential roads should be 20mph.

Southey Street cut-through should not be 30mph – 20mph max.

Penge Lane/Parish Lane junction is dangerous. You cannot see oncoming traffic (when joining Parish Lane)

20 mile speed limit in Penge

Speed hump needed in Parish Lane (restore the hump removed from outside Alexandra Pub?)

More recognisable pedestrian crossings (ie better signposting of informal crossings and pedestrian refuges)

Speed cameras would be good, especially on Croydon Road.

Enforce speed limits

Check traffic light signals are working well

Sensors on traffic lights so that, when there is no traffic, pedestrian lights work once (immediately) the button is pushed.

Junction of Parish Lane with Green Lane – pedestrian light will go out once pushed. Not helpful for blind people who could be waiting until a sighted pedestrian alerts them.

CCTV at more junctions/bring back lollipop personnel.

Junction on Penge High Street where paving is being replaced has temporary traffic signals. Again no beep when green man shows and traffic is tending to jump the lights due to their timings.

Penge Lane – parking on both sides of the road causes lots of congestion and difficulty for pedestrians crossing.

More Labour Councillors.

More money for road safety measures.

More 20mph zones.

Safer crossings.

More consultation with residents and a coherent, Borough-wide plan – not piecemeal.

Bus stops keep changing location. Causes difficulty for people with limited mobility.

Control of speed on Parish Lane.

Please fix the pedestrian lights at Parish Lane and Green Lane.

Camera enforcement on traffic lights needed.

More speed restrictions similar to that of Dulwich and Crystal Palace. Because you don't currently (have speed restrictions) and the surrounding areas are enforced, that makes us a shortcut/speeders haven.

No "beep" on lights to cross at High Street.

Time to cross at High Street lights has been shortened – not fair for elderly etc.

Traffic is jumping lights.

Need traffic enforcement cameras.

More to be done to make crossing the road safe. Speed limits? Better signage?

Traffic lights don't give the elderly/physically challenge enough time to cross road.

Kings Hall Road (approaching Kent House Station) has very fast traffic. Slow it.

Improve public transport.

Provide more charging points for electric cars.

Reduce speeds to 20 mph.

Outside St Christopher's Hospice cars speed before entering/leaving Sydenham 20 mph zone. Cars race go wrong side of bollards.

Torr Road from Green Lane – cars travel wrong way in one-way section.

Torr Road junction with Cottingham Road – proud piece of cement causing a trip hazard.

Cottingham Road outside Penge Food Store – pavement often blocked by trolleys, delivery lorries break the kerb (it's been repaired three times).

Poor street lighting in Adelaide Road.

Longer crossing times needed at Penge High Street lights.

Road diversion signs should be tested, preferably by someone who is not familiar with the roads and roadworks, to ensure that people can get to where they want to go without getting lost.

Stronger enforcement of road rules, eg crossing red lights and speeding.

Road Safety 2018

Do you have suggestions for Bromley Council that will improve road safety locally?

20 mph on main roads (like Anerley Road) and effective enforcement

Elderly people not catered for

Simplify the double roundabouts at the junction of Kings Hall Road, Parish Lane and Kent House Road to a single roundabout. Cars already drive over, so not an additional consideration in this case.

High Street Penge (new layout) – more white lines equidistant in both directions and increase green man crossing time.

Library in Green Lane has no barriers outside its main doors to stop children and vehicles colliding.

New surface in entrance to Blenheim Centre is slippery when wet.

Mobility scooters cannot get up and down from pavements easily.

Motorists already jumping lights on Penge High Street, but due to new layout pedestrians cannot see them approaching.

Why no traffic enforcement cameras at lights?

Why no 20mph speed limits north of Penge High Street (eg Wordsworth Road and Raleigh Road)

Southey Street cut-through from Penge High Street should not be 30mph limit.

Cut the speed limit – all residential roads should be 20mph.

Southey Street cut-through should not be 30mph – 20mph max.

Penge Lane/Parish Lane junction is dangerous. You cannot see oncoming traffic (when joining Parish Lane)

20 mile speed limit in Penge

Speed hump needed in Parish Lane (restore the hump removed from outside Alexandra Pub?)

More recognisable pedestrian crossings (ie better signposting of informal crossings and pedestrian refuges)

Speed cameras would be good, especially on Croydon Road.

Enforce speed limits

Check traffic light signals are working well

Sensors on traffic lights so that, when there is no traffic, pedestrian lights work once (immediately) the button is pushed.

Junction of Parish Lane with Green Lane – pedestrian light will go out once pushed. Not helpful for blind people who could be waiting until a sighted pedestrian alerts them.

CCTV at more junctions/bring back lollipop personnel.

Junction on Penge High Street where paving is being replaced has temporary traffic signals. Again no bleep when green man shows and traffic is tending to jump the lights due to their timings.

Penge Lane – parking on both sides of the road causes lots of congestion and difficulty for pedestrians crossing.

More Labour Councillors.

More money for road safety measures.

More 20mph zones.

Safer crossings.

More consultation with residents and a coherent, Borough-wide plan – not piecemeal.

Bus stops keep changing location. Causes difficulty for people with limited mobility.

Control of speed on Parish Lane.

Please fix the pedestrian lights at Parish Lane and Green Lane.

Camera enforcement on traffic lights needed.

More speed restrictions similar to that of Dulwich and Crystal Palace. Because you don't currently (have speed restrictions) and the surrounding areas are enforced, that makes us a shortcut/speeders haven.

No "beep" on lights to cross at High Street.

Time to cross at High Street lights has been shortened – not fair for elderly etc.

Traffic is jumping lights.

Need traffic enforcement cameras.

More to be done to make crossing the road safe. Speed limits? Better signage?

Traffic lights don't give the elderly/physically challenge enough time to cross road.

Kings Hall Road (approaching Kent House Station) has very fast traffic. Slow it.

Improve public transport.

Provide more charging points for electric cars.

Reduce speeds to 20 mph.

Outside St Christopher's Hospice cars speed before entering/leaving Sydenham 20 mph zone. Cars race go wrong side of bollards.

Torr Road from Green Lane – cars travel wrong way in one-way section.

Torr Road junction with Cottingham Road – proud piece of cement causing a trip hazard.

Cottingham Road outside Penge Food Store – pavement often blocked by trolleys, delivery lorries break the kerb (it's been repaired three times).

Poor street lighting in Adelaide Road.

Longer crossing times needed at Penge High Street lights.

Road diversion signs should be tested, preferably by someone who is not familiar with the roads and roadworks, to ensure that people can get to where they want to go without getting lost.

Stronger enforcement of road rules, eg crossing red lights and speeding.

Safety issues raised via Penge Forum for Bromley Road Safety Panel Meeting 13.3.18

Newlands Park Road, Lennard Road, Parish Lane, Kings Hall Road, Thicket Road, Maple Road, Oakfield Road, side roads off Croydon Road are all experiencing boorish behaviour by motorists:

- Speeding;
- Not indicating when turning into roads;
- Verbally abusing and/or not giving way to pedestrians already crossing the road.

Most incidents appear to be taking place around the junction of Lennard Road with Parish Lane. Suggestions made:

- 20 mph speed limit at bend in road where Newlands Park turns into Lennard Road, complemented by signage asking motorists to slow as pedestrians are likely to be crossing, accessing Penge East Railway Station, the shops in Station Parade the bus stops in Lennard Road and Newlands Park Road, Alexandra Recreation Ground's children's play ground and en route to local schools.
- Improved signage particularly for informal crossing on corner of Lennard Road with Newlands Park Road or, ideally, an improved and safer crossing;
- Signage reminding motorists that s170 of Highway Code gives priority to pedestrians already in the road.
- Mini-roundabout at junction of Parish Lane with Lennard Road to improve safer exit for motorists from Parish Lane into Lennard Road as sight lines are compromised (in part by unlawful parking on pavement on section of Lennard Road running alongside the lower boundary of the children's playground).
- "Slow, pedestrians crossing" signage in Parish Lane and Penge Lane to replace the out-dated (New road layout) signage removed last year, taking account of the increased footfall since the opening of the Alexandra Public House and the Alexandra Nurseries and Tea Room.

Further thought to be given on how to cut speeds of traffic in Kings Hall Road (particularly near entrance to Kent House Station, the pre-school establishment, the alleyway into Cator Park, which is soon to be used by increased numbers of cyclists if the Quiet Ways scheme goes ahead. Ditto for Kent House Lane which is parked on both sides of the road and passes two schools.

Further thought to be given to pedestrians attempting to cross Maple Road at its junction with Penge High Street. Motorists reported to be driving into Maple Road from the High Street without signalling and at speeds too fast for pedestrians to cross comfortably. Many pedestrians are accompanied by small children. Many others are simply not as adept as they were at dodging traffic. Pedestrian refuge suggested.

Further thought to be given to pedestrians attempting to cross Oakfield Road at its junction with Penge High Street. Same problems as with Maple Road – traffic attempting the corner too quickly, not signalling their intentions. If a pedestrian refuge is not practicable, perhaps a raised section of road at this junction?

Further thought to be given to pedestrians attempting to cross side roads off Croydon Road. Again cars turn into these roads at speed (especially if they have to turn across the traffic in Croydon road).

Finally does anyone have contact details for the London Safety Camera Committee (representatives of police, London Borough and Health authorities sit on this, but there seems to be no way an ordinary mortal can contact them).

And can we have an updated list of projects and their contact officers circulated for the coming year, please?

DRAFT

Response from Petts Wood and District Residents Association

On behalf of the Petts Wood and District Residents Association I have submitted to the Council under separate cover the Association's response to the LIP using the Council's response form. In addition to that response, the Association now wishes to draw to the Council's attention two potential schemes for improving cycling and walking accessibility in the vicinity of Petts Wood. The two potential schemes are described below by reference to the attached plan, provided for ease of reference.

Scheme 1

Scheme 1 simply requires the conversion of the existing footpath FP134, which connects Shepperton Road in Petts Wood to Crofton Road, following the course of the Kyd Brook stream, to a combined footpath and cycleway.

Scheme 2

Scheme 2 simply requires the conversion of a portion of the existing footpath FP136, which connects Faringdon Avenue on the southern boundary of Petts Wood to FP134, to a combined footpath and cycleway. The optimum route for Scheme 2 however would be to follow the route of the London Loop from Faringdon Avenue to FP134.

Background

The need for these two potential cycleway schemes has been identified to improve cycling accessibility between Petts Wood, Locks Bottom and the Princess Royal University Hospital. . Furthermore the implementation of the two Schemes would enhance cycling accessibility to the Darrick Wood and Crofton Schools. With the imminent implementation of the Locks Bottom to Orpington Station cycleway, both the potential Schemes 1 and 2 would link to the Council's new cycleway. The creation of Schemes 1 and 2 would improve cycling connectivity between the residential area of Petts Wood and the major employment area in the vicinity of Locks Bottom, with the added potential to reduce the use of the car along both Crofton Road, Crofton Lane, and their feeder roads.

I trust that the Council will give serious consideration to adding these two cycling schemes to its current transport proposals.

Other organisations

Response from GVA HOW Planning

GVA HOW Planning

Our Ref: 1791
Your Ref: LIP3

11 January 2019

LIP Consultation Team
Bromley Civic Centre
Stockwell Close
Bromley
BR1 3UH

Sent by email to: transport.strategy@bromley.gov.uk

Dear Sir / Madam

REPRESENTATION TO THE THIRD LOCAL IMPLEMENTATION PLAN FOR TRANSPORT (LIP3): ON BEHALF OF LANDS IMPROVEMENT HOLDINGS (LIH)

These representations have been prepared on behalf of Lands Improvement in relation to the London Borough of Bromley's (LBB) Draft Local Implementation Plan (LIP).

Lands Improvement strongly supports proposals to align housing growth and sustainable transport.

The population of Bromley is due to grow significantly in the next 15 years. There are forecast to be an extra 30,000 people living in the borough by 2032 putting greater pressure on existing transport networks. This needs a fully integrated approach to housing growth, planning and transport to reduce the need and distances required for people to travel.

Lands Improvement

Lands Improvement specialise in the purchase, promotion and delivery of large-scale development projects throughout the UK. Projects include the development of brownfield regeneration and sustainable greenfield sites.

Lands Improvement's focus is on community led, sustainable development that delivers well-designed and well-connected communities that are pleasant and vibrant places to live and work and are valued by both new and existing residents.

Lands Improvement own a sustainable development opportunity site to the east of St Mary Cray. The site adjoins the urban area and is near existing jobs, schools and shops.

The site could deliver in the region of 1,000 – 1,200 family homes, including a significant proportion of affordable housing.

The site is of low environmental and agricultural value and is not being put to best use given the significant need for housing in London and the significant undersupply of housing sites.

65 Gresham Street
London
EC2V 7NG

T: +44 (0)8449 02 03 04
F: +44 (0)161 956 4009

howplanning.com

GVA HOW Planning is a trading name of GVA Grimley Limited registered in England and Wales number 4382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

As well as housing, the site has the potential to accommodate a new school / other community facility and contribute towards transport improvements to public transport and local highways.

The site is in the Cray Valley Renewal Area and close to the Cray Business Corridor. Development on the site would support the growth and regeneration of these strategically important areas.

Fig.1 St Mary Cray East Site Location Plan



The site would be a catalyst for regeneration in St Mary Cray to improve local facilities, support create jobs and deliver much needed new family homes.

Representations

As drafted, the LIP fails to deliver a co-ordinated approach to housing growth and transport improvements support sustainable development.

The LIP should be updated to acknowledge:

1. *The location and design of new housing developments will have a significant role in influencing how people travel.*

Building new homes in and around existing urban areas means people are located nearby to day-to-day destinations. To keep up with housing needs LBB needs to build beyond existing settlement boundaries. The LIP should set out an approach to new development which supports sustainable transport including:

- Locating new development adjacent to existing settlements and along existing or planned public transport corridors.

- Building whole new communities designed to prioritise sustainable transport, e.g. Sustainable neighbourhood extensions
- Larger developments should be mixed use, thereby encouraging the localised trips on foot and by cycle.
- New development should be built to an appropriate higher density, to encourage more compact settlements thereby increasing proximity of local facilities.
- Sustainable travel infrastructure should be planned and built into new developments from the outset. This should include: walking provision, cycling infrastructure and public transport provision.

2. *Well planned housing growth can enable sustainable transport*

Major new housing development, like that proposed by Lands Improvement in St Mary Cray East, can be a catalyst to support major transport infrastructure improvements through s106 planning obligations and CIL. The potential for housing growth to support sustainable transport should be recognised as part of the LIP. There are two significant transport projects in St Mary Cray that could directly benefit from major new housing development in the area:

- **St Mary Cray train station**

Lands Improvement's site is close to St Mary Cray Station. Lands Improvement support the proposed Access for All project at St Mary Cray for the provision of step free access included at Outcome 6. As the LIP acknowledges the funding for these upgrades is not secured and dependant on Network Rail priorities. Financial contributions towards these upgrades and other station improvements should be sought through nearby development as a fall back.

As a more general comment the LIP should actively support the approval of sustainable development (ie located near to existing shops, services and employment areas and would have a lesser impact on the existing local transport network) which are able to contribute towards an accessible and improved transport network. By supporting new development, additional funds can be secured through s106 planning obligations and CIL which can support the wider aims of the LIP.

- **A224 / Business Corridor / Crittall's Corner**

LBB's Cray Business Corridor Study 2014 provides an assessment of the highway impacts associated with the proposed redevelopment of the Business Corridor. It provides recommended improvements to the highway network that would mitigate the impacts. It identifies that significant funding would be needed to deliver these and that it would be necessary to pool financial contributions from developers.

Despite being a focus of LBB's Local Plan and the findings of the Cray Business Corridor Study, the LIP includes no new initiatives to improve pedestrian, cycle and bus access along the Business Corridor.

This is a significant omission. The Cray Business Corridor is one of three strategic priority areas for economic growth identified in the London Plan and at Draft Policy 80 of the Local plan. It is expected to play a vital role in creating new jobs, which will have to be supported by significant transport infrastructure upgrades.

In the absence of any other funding only major development nearby to the business corridor will be able to fund these major highway upgrades. If this does not happen

the situation will not be resolved and will worsen. If that is the case, then the overarching objectives of the LIP to support sustainable transport, healthy lifestyles and to help grow the economy will not be achieved.

We trust the above comments are helpful and will be taken into consideration in the next stages of not hesitate to contact me if you have any questions or require ands Improvement.

DRAFT