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Transport for London
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Sent via email

15 August 2022

Dear Mr Tuckley,

Liveable Streets consultation

Thank you for the opportunity to respond to the consultations on the London Borough of Tower Hamlets Liveable Streets schemes.

These four schemes have progressed to date using funding from Transport for London (TfL). Unfortunately, TfL was not formally notified of your intention to consult on the removal of these schemes until 29 July.

We understand removing these schemes was a manifesto commitment of the Mayor of Tower Hamlets. However, the consultation did not provide sufficient monitoring and evaluation to explain and support your course of action. As a result, without the borough following consultation guidance for these types of schemes, TfL objects to the removal of these schemes

We welcome your commitment to improving air quality in Tower Hamlets in your manifesto. Active travel can and will play a vital role in fulfilling this pledge. TfL data shows residents in your borough prefer active travel options:

- Tower Hamlets has the third lowest rate of car ownership across London boroughs with 71 per cent of residents not owning a car; and
- Tower Hamlets has above average proportion of people choosing to use active travel modes with 80.6 per cent walking, cycling, or using public transport on a regular basis.

Based on this, TfL continues to support schemes, such as these that make it safer and easier for people walking, cycling, and using public transport in the borough.

One of the schemes you are consulting on, the Bow Liveable Streets Low Traffic Neighbourhood, was funded by the Department for Transport's (DfT) Active Travel Fund through TfL and implemented using an Experimental Traffic Order (ETRO). Any schemes funded and implemented this way cannot be removed without Tower Hamlets engaging with TfL first.

Our guidance from October 2021 states that 'monitoring is required for changes or removal to be made at the end of the ETRO.' Guidance also states that any consultation local authorities must provide ongoing monitoring and evaluation, which can include traffic counts, cycle counts, air quality data or feedback from residents. Ideally consultation would last up to six months, as this length of time provides opportunity for an experimental scheme to embed and for the public and other stakeholders to come to a view about their experiences of it.

This reflects government Statutory guidance [Traffic Management Act 2004: network management to support active travel](#). The Secretary of State for Transport noted that '*Schemes must not be removed prematurely or without proper evidence. And any decisions on whether to remove or modify them must be publicly consulted on with the same rigour as we require for decisions to install them*'. He is also clear this must be an evidence-led approach '*rather than listening only to the loudest voices*.'

The Bow consultation does not provide any evidence of ongoing monitoring and evaluation.

For the other three schemes, which used Local Implementation Plan (LIP) funding, section 5.3 of the TfL LIP Finance and Reporting Guidance (which can be found at <https://content.tfl.gov.uk/lip-finance-guidance-19.pdf>) requires TfL to undertake an audit of work. Only once TfL has been engaged with can the borough then consult with residents.

We are concerned about the removal of these schemes without that decision being supported by a full set of evidence, including how you are meeting your public sector equality duty. If these issues are not satisfied it may impact TfL's decision on future funding for any schemes in Tower Hamlets. I am aware there are local concerns regarding your plans to remove the schemes, which should be listened to.

Another factor we would like to raise is that the removal of some of these schemes will have a negative impact on bus services and quality of life. Particularly, it is important to stress the bus gate you intend to remove at Wapping is not part of the Liveable Streets Programme, rather it was installed using TfL bus priority funding, and allows for faster and more reliable journeys on the route 100.

Furthermore, removing the Old Bethnal Road scheme would prevent TfL introducing a bus priority scheme on Hackney Road as cyclists who currently benefit from the scheme would be forced back to use that road, meaning it would not be possible to designate space for the bus priority scheme specifically. This, in turn, would affect bus journey times, as well as the experience of cycling in the borough

We also want to highlight that TfL funding cannot be used to remove any of these schemes.

TfL would like to work more closely with borough officials and elected representatives to ensure that these consultations follow DfT guidance. We have invited the Mayor of Tower Hamlets to discuss the borough's plans to encourage people to walk, cycle or use public transport and how we can work together to improve air quality in the borough. Please respond to my colleague [REDACTED] in the Local Communities and Partnerships team ([REDACTED]@tfl.gov.uk) to accept our invite for a meeting to discuss this.

Alex Williams

Director of City Planning

Transport for London