

Appendix 2

Comments received on the Consultation Draft LIP3 and our responses. All references relate to the numbering in our Consultation Draft LIP which can be viewed [here](#). All the resulting changes to our LIP therefore may have slightly different numbering in our Final Draft LIP in Appendix 3, so we have identified them by highlighting them in **yellow**.

Who /Topic	Reference No / Comment	Response
Transport for London 1 – General	1.1 - All general LIP requirements have been met. The LIP could be strengthened by expanding the section covering other Mayoral strategies, identifying why they are priorities within the borough's ambitions.	Noted. Add text referencing other Mayoral strategies under Section 2.15.
2 – Objective setting – Mode Share	2.1 - All requirements met with regards to objective setting around overall mode share.	Noted
	2.2 - It is noted that the LIP includes six specific transport objectives, including Objective 1 that specifically seeks to encourage more trips by walking, cycling and public transport and fewer by car.	Noted
	2.3 - The borough could strengthen the objectives they have set by including one that focuses on supporting sustainable growth, or by incorporating growth into an existing objective.	Amend Objective 1 to - Encourage more trips by walking, cycling and public transport and fewer by private car – <i>including in new developments to support sustainable growth</i>)
3 - Objective setting – MTS Outcomes	3.1 - Overall the borough objectives that have been set to deliver against the nine MTS Outcomes are aligned to the MTS. However, in a number of cases the LIP could benefit from greater detail or clarification in the	Noted

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	accompanying narrative to demonstrate more clearly what the borough will do to deliver against an outcome.	
3.2 – Outcome 1	The borough needs to provide more detail on plans for cycling, both at a local and strategic level. This will demonstrate how the borough intends to increase active travel levels and will also contribute towards strengthening the narrative around how Vision Zero will be addressed.	We will list our proposed Quietway Routes reflecting those identified in TfL’s December 2018 Cycling Action Plan We will add a map of our existing Quietway Routes and those we are currently consulting upon.
	It is noted that the borough has set a more ambitious target for outcome 1b based on the delivery of a new Quietway route – the narrative for Outcome 1 should be strengthened by including reference to this route and outlining where the route will go in the borough.	Add text referring to our existing and proposed Quietway Routes and reference to new Quietway Map.
3.3 – Outcome 2	The wording for the borough objective set against Outcome 2 needs to be strengthened to demonstrate a clearer commitment to Vision Zero.	Amend Objective 2 Make our streets safer, secure and with fewer road collisions and <i>work towards zero killed and seriously injured casualties by 2041.</i>
	It is noted that the borough raises a number of issues around the delivery of Vision Zero including the number of incidents recorded on the TLRN and also changes in the way in which collisions are recorded.	Noted
	On the last point, please refer to the next section on targets for further information on how this should be addressed in the final LIP.	Noted

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3.4 – Outcome 3	The narrative for this Outcome needs to be strengthened to demonstrate a greater commitment to delivering a reduction in traffic and car ownership across the borough. It is noted that a more ambitious near-term target for traffic reduction has been set for 2021, but it's not currently clear from the narrative for this Outcome how the borough will achieve this.	<p>Add reference to new paras on cycle routes as per response to comment 3.2 above.</p> <p>Also reference car clubs, including floating car clubs, high speed fibre optic broadband aspiration to reduce the need to travel, active travel training, 20 mph trials and speed activated signs / speed indicator devices and subtle filtering proposals. Add statistics on historic car ownership in the borough at 2.8.7</p>
3.5 – Outcome 5	The LIP could be strengthened on this Outcome by including any aspirations the borough has beyond committed schemes being undertaken by other partners (TfL, Network Rail).	<p>Section 2.10 - Add text on our aspirations for the extension of West London Line Services to Gatwick and the removal of unused freight train paths from the West London Line to provide greater passenger train capacity to reduce current overcrowding.</p> <p>Also add text on match funding Council Capital Budgets for step-free access at Ladbroke Grove and High Street Kensington underground stations in 2021/22 and a cross reference to White City pedestrian / cyclist underpass and bridge proposals.</p>

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3.6 – Outcome 7	The narrative for Outcome 7 should be expanded to provide more detail on the borough’s plans in relation to this Outcome.	Section 2.12 - Add text on Bus Stop Countdown at Canal Way bus stops and waiting and loading restrictions review on Kings Road.
3.7 – Outcomes 8 and 9	The LIP could be strengthened in relation to this Outcome, perhaps by including reference to new development as part of one of the objectives.	See proposed response to 2.3 above.
	The narrative around unlocking development could be expanded beyond the discussion around Kensal Waterside to consider how interventions could unlock development elsewhere, including Earl’s Court and smaller sites across the borough.	Sections 2.13 and 2.14 - Add text on Earl’s Court and smaller sites across the borough.
	The LIP does not currently include any reference to Crossrail 2 that could be identified – the LIP could be strengthened by including reference to this, setting out the borough’s aspirations in relation to this key proposed scheme.	Para 2.4.19 gives our position on Crossrail 2.
4 - Borough targets 4.1 Outcome 1	As previously referenced – it is noted that the borough has set a more ambitious target for Outcome 1b. As this is considerably higher than the 48% trajectory set out in the borough data pack, at 70%, the LIP should provide more detail around how this will be achieved in relation to the mentioned Quietway route, perhaps by inclusion of a map detailing the route, or more information on where the route will go in the narrative to Outcome 1.	See response to comment 3.2 above.

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4.2 Outcome 2	The borough needs to set a KSI target for 2041, this has not currently been set.	We will set a target of zero killed or seriously injured casualties by 2041.
	<p>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).</p> <p>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.</p>	We will update the collision data and road safety targets in our LIP to reflect the back-casted collision data.
	<p>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:</p> <p><i>‘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</i></p>	We will add the suggested text in the context of what our LIP already says about COPA in 2.7.4.

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	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.'</i></p>	

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4.3 Outcome 3a	For Outcome 3a, reducing traffic volume, the 2021 target set in the LIP is significantly more ambitious than the suggested trajectory (475m vehicle kms against 495m in the data pack). More ambitious targets are welcomed, but the borough should provide more supporting narrative, both in the accompanying targets table and under Outcome 3 more generally, to demonstrate how they plan to achieve the more ambitious target.	See proposed response to comment 3.4 above and cross reference in the Additional Commentary column in the targets table (Table 7) and commentary on our falling population rather than a growing one like most other boroughs.
4.4 For Outcome 4	It is noted that the borough has set a less ambitious target for 2021 on NOx emissions. It is recommended that this be set in line with the borough data pack. If a different target is to be set then a justification should be provided.	Following useful discussions with TfL and clarification of the impact of the TfL-led air quality initiatives (in addition to ULEZ) on NOx emissions in the borough, we will amend this target to 150 tonnes.
4.5 For Outcome 5	The LIP would benefit from elaboration around the comment provided against the target for Outcome 5 in the targets table about the borough not viewing public transport trips as a good thing. More explanation around this should be provided.	Add some more text to the relevant Additional Commentary column explaining our concerns that additional public transport trips may come at the expense of ones by active modes.
5 - Delivery Plan – Longer term	5.1 - All requirements met with regards to provision of detail on longer-term plans in the borough. This could be expanded to include the borough's aspirations for an Elizabeth line station in the north of the borough.	We will add a cross reference to the section on an Elizabeth Line station at Kensal Portobello in 2.10.1
6 - Delivery Plan – 3-year programme	6.1 - All requirements met – no comments.	Noted

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7 - Delivery Plan – 1 year programme	7.1 - It is noted that a Pro-Forma A has been submitted. More detailed comments on this will be fed back directly via the borough Sponsor.	Noted
	7.2 - The LIP should include more detail and commentary on the one-year plan within the main LIP submission. It was subsequently agreed by TfL that the borough could disregard this comment and it wasn't clear what was being referred to in the feedback under 7.2.	Noted
Whitelands House Residents' Association Overarching aim of the MTS	Re: The Mayor of London published his Transport Strategy (MTS) in March 2018. Its main aim is for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041 (compared with 63 per cent in 2015). This is a nonsense if the Mayor plans to reduce or decimate London buses. It is already becoming increasingly difficult to get around London by bus. Neither should the Mayor be encouraging cycling. One cyclist needs the width of a London bus and four cyclists end to end are equal to the length of the bus. So, four cyclists require the same road capacity as a London bus which carries 74 passengers.	The LIP references the Council's objections to the Mayor's plans to remove some bus services and reduce others across the borough in Sections 2.4.14 and 2.11.1. A summary of our response to the Mayor's consultation can be found here . Our established policy, in line with the MTS, is to encourage and support cycling as well as walking and public transport use.

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	<p>The Mayor is losing money because cyclists pay nothing for their mode of travel whereas if they were travelling by public transport, they would contribute to the finances.</p> <p>Neither is it true to say that cycling is healthy. If exercise is needed, walking is an alternative.</p> <p>Also, the proliferation of cycle lanes (often sparsely used) reduces road capacity for other vehicles and cause congestion and pollution as the vehicles are often stationary or slow-moving. Other vehicles are necessary in a city whether one likes it or not.</p>	<p>Noted</p> <p>We do not agree that cycling is not a healthy mode of active travel and we will continue to encourage and support it, as well as walking and public transport use.</p> <p>Noted. The existing text of the LIP discusses this in the Challenges and Opportunities section. While private vehicles are needed for some trips, we need to reduce their use in order to maximise the efficiency of the road network.</p>
	<p>It's incorrect to blame cars for problems as car usage in central London has declined dramatically, compared with taxis and delivery vehicles.</p>	<p>According to TfL's latest statistics, average vehicle kilometres driven by all vehicles in the Royal Borough increased slightly from 495 million in 2015 to 497 million in 2016 (0.4 per cent). We are not aware of any accurate statistics that break that down into journeys by taxis, private hire vehicles and delivery vans.</p> <p>The LIP does not "blame" cars but does recognise that car travel is less efficient than walking, cycling and public transport, and there is a need to shift towards these modes in order to address, for example,</p>

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		our significant air quality and climate change challenges.
Resident of De Vere Gardens	1 PM2.5 is a critical environmental indicator because these particles are truly tiny and get into the blood stream so are more harmful than PM10. There should therefore be an additional graphic showing the PM2.5 concentrations. (Map 4)	Agreed – we will add a reference to PM _{2.5s} and a concentration map to our final LIP.
	2 It is quite hard to read the maps unless you are totally familiar with them without some key pointers e.g. tube stations or street names. Can you super-impose these to make it easier to identify the various locations. (Maps 4 & 5)	We will make the Maps clearer in our final LIP.
	3 Lastly the NO2 and PM10 maps are from 2013. We have all moved a long way with diesel cars since then so we ought to be able to see updated maps, even if 2013 is considered the benchmark. Maybe either the 2013 or 2018 maps be put in an appendix. (Maps 4 & 5)	All maps are provided by GLA as part of the London Atmospheric Emissions Inventory (LAEI). No more recent modelling data is available. We are awaiting a revised LAEI (due to be released soon) that will provide an updated scenario. 2020 prediction maps are available, but we do not include them as they are only predictions not modelled and checked with actual monitored levels.

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	<p>4 I could not see reference to anti-idling signs or enforcement by RBKC's own staff ie traffic wardens – maybe this could be added? 2.3.11-14, 2.9</p>	<p>Anti-idling campaigns and enforcement are referenced in Section 3.7.14.</p> <p>We will update the draft final LIP to include the following;</p> <p>The Council has powers under the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 to issue a Fixed Penalty Notice of £40 (reduced to £20 for early payment) to drivers if they refuse to switch off their engine when asked to do by a Council officer. The practical experience of this Council, and our counterparts in other boroughs, is that virtually all drivers either switch off their engines when asked to do so, or drive off.</p> <p>To that extent, while enforcement activity achieves the immediately desired outcome of persuading a driver to cease idling, it does not necessarily lead to the long-term behaviour change that we wish to see.</p> <p>With this in mind, we are redoubling our efforts to educate drivers that they should not leave their engines running when stationary at the kerbside. We now</p>

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		<p>enclose a leaflet about engine-idling with the letters that we send to residents whose car parking permits are due to be renewed. Over the course of a year we will therefore have written directly to all residents who have an RBKC parking permit.</p> <p>Furthermore, our Civil Enforcement Officers (CEOs) will be handing out a separate flyer to drivers whose vehicles have their engine running unnecessarily. As with the letter to residents, the flyer will explain why engine idling is unacceptable. The CEOs – otherwise known as parking attendants – will keep details of the locations where they observe engine idling; this intelligence will be passed to the highways enforcement officers who are authorised to issue Fixed Penalty Notices under the 2002 Regulations, and who will then focus their efforts on any emerging “hotspots”</p> <p>We will add some more text to update our latest proposals regarding ant-idling.</p>
	5 Update map 6 for new bus routes please.	We will update the public transport map in the final approved version of our LIP.

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	<p>6 RBKC needs to link this up with actual planning implementation eg Heythrop College where the construction will cause massive pollution (noise, vibration and particulates) on some of Kensington's quietest streets. Planning can help ensure that a small scale scheme (rather than something grandiose) will cause minimum environmental damage in line with residents' wishes.</p>	<p>Such planning permissions are conditional on a suite of specialist technical documents aimed at mitigating and managing the negative environmental impact of construction.</p>
<p>Resident</p>	<p>In the recent past, I have seen cyclists on pavements from High St Kensington to Lower Sloane St to Elystan St to Albert Embankment (not admittedly in RBKC). Cyclists regard pavements as their right. And there are more such incidents all the time. Many cyclists overtake pedestrians on pavements from behind which is particularly dangerous since you have no reason to suppose they are there and can move straight into their path unknowingly</p> <p>My suggestion is:</p> <p>i) cyclists should be licensed and pay eg a £10.00 annual fee.</p>	<p>It is always very frustrating when individuals do not abide by traffic laws. Cycling on pavements is an offence, and responsibility for enforcement lies with the Police.</p> <p>While the Council does not condone illegal behaviour, it recognises that some people choose to ride on pavements because they are afraid to ride on the carriageway. Our programme of improvements to cycling routes is designed to encourage people to cycle safely, on the road.</p> <p>Noted. Consideration of any such licensing scheme for cyclists is the responsibility of national government rather than the Council.</p>

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	<p>ii) Cyclists and moped riders should be obliged to wear helmets. The helmet should have a slot for a licence card in its front. The card would be issued on payment of the licence fee for the front of the helmet and would be readable by the multitude of ANPR (automatic number plate readers) in central London. This would not be difficult in technology terms as regards the software. But I do not know anything about the manufacture of helmets other than when there is an incentive, business will respond. And the incentive would be the sale of many thousands of new helmets.</p> <p>iii) A first offence when caught on a pavement (or other transgressions) would require the cyclist to attend a course on "courtesy" and coping with other road users (cf drivers sent on courses for speeding)</p> <p>iv) A second offence would incur a fine. Proceeds towards upkeep of the many cycle lanes which have proliferated and the roads.</p> <p>v) A third offence would lose the licence for a year.</p> <p>vi) Any cyclist not using a helmet with a visible licence would have his cycle impounded. If it should be a Santander bike, then he would be blocked from further usage of the scheme for x months.</p> <p>Such a scheme would need to be adopted London wide. It would have the merit of raising funds for maintenance</p>	

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	<p>of the roads and pavements. It could help the police cope with the young criminals using mopeds. Today's ANPR software can cope with the billions of car movements and could certainly cope with the addition of cyclists/moped riders into and around London.</p> <p>Politically one can see this raising a storm with the powerful cyclists lobby. The alternative would be for them to police themselves and operate some form of call centre where complaints and photos/videos of transgressors could be sent. But then what?</p> <p>At least worth a debate.</p>	
Resident	<p>Thank you for your update.</p> <p>I have lived and worked in the Borough for over 40 years. Until Grenfell, I was proud to live here.</p> <p>My feedback:</p> <p>1.The report item 2.2.6. "A disproportionate number of our residents have professional and managerial occupations." It is surely out-of-order for the report writers to include their own opinions, how do they decide what is disproportionate'? Just stick to the facts. So what if we have managerial and professional occupations? That is a good thing, surely.</p>	<p>In drafting our LIP, we, like other boroughs, outline the existing nature of the borough, including any notable characteristics. One such characteristic is that a 'disproportionate number of our residents have professional and managerial occupations.'</p> <p>We say disproportionate because the proportion of borough residents who have a managerial or professional occupations is higher than in other boroughs and higher than the average share across the UK. The term was not a judgement of any sort – especially not a negative one – but simply a neutral observation of a borough</p>

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		characteristic, similar to that found in other boroughs' LIPs.
	<p>2. Cycling behaviour.</p> <p>Two weeks ago I was knocked over flat while <u>on</u> a pedestrian crossing. The crossing is on Kings Road, near to Lots Road, SW10.</p> <p>The cars had stopped but the bike went straight into me, because he wasn't looking I had a slight injury to my arm, I was very shaken. I had 2 x-rays and an MRI scan, simply because a cyclist thinks he owns the road. I could have been knocked unconscious by this thoughtless man.</p> <p>So it is time for cyclists to take better care on the roads. They are not competing in the tour de france</p>	<p>We are sorry to hear of this incident. It is always very frustrating when individuals do not abide by traffic laws.</p> <p>Responsibility for enforcement of non-compliance with pedestrian crossings lies with the Police rather than the Council.</p>
Henry Dickens Residents Association	<p>I have gone through 75 pages of repeated information! I also doubt if my concerns / comments are even acknowledged.</p> <p>On the whole, all I could clearly define is, that there is to be reductions in buses and more worryingly - smaller buses.</p>	<p>Whilst we cannot acknowledge all the comments received on our Consultation Draft LIP we will respond to all of them in this report.</p> <p>The LIP references the Council's strong objections to the Mayor's plans to remove some bus services and reduce others across the borough in Sections 2.4.14 and 2.11.1. A summary of our response to</p>

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		<p>the Mayor of London's October 2018 consultation can be found here.</p> <p>We are not aware of any plans to replace double-decker buses with single-decker ones. Our concern is that for the disabled, older people and people with children, using the top deck of a bus is not an option. So as far as these groups are concerned, all buses are effectively single deckers.</p>
	<p>You only 'lightly' touched on the mobility of residents needing to use public transport - mothers with prams, those needing seats etc. not once have did you raise how residents, like myself in a wheelchair, will be able to easily travel by buses in the future; (considering how difficult it already is). If buses are single deck - it will means less space - buses will automatically be more full and impossible for a wheelchair user to get on the first / second or even 3rd bus that comes along, (this is already the case on a double deck bus)! Wheelchair user also work and have to get there on a daily basis! Who makes up your mobility panel?</p>	<p>Our response to the above consultation specifically references the problems faced by the disabled, older people and people with children when using buses.</p>
	<p>Unless you are a wheelchair user you have no idea whats so-ever the affects of less buses / smaller buses will have. Instead of progression, we are going backwards as far as 'equality' in this area is concerned. Perhaps people who come up with these plans should</p>	<p>Noted – see above comments.</p>

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	spend a week in a wheelchair and try the travelling (unaided).	
	In the north area where I reside, its a daily struggle, especially in winter / bad weather; its no good saying priority is given when the buses are so full there is no room to even get the wheelchair through; have any of you sat waiting in the pouring rain to have 3 -4 buses go by in rush hour - not because the transport is not there but its already too full to even get on!	Noted – see above comments.
	I have grave concerns over bus routes being cut and possibility of single deck buses being used. Great if more able bodied people could safely walk or cycle; less domestic cars on the roads; but its certainly not meeting any equal opportunities that I have read.	Noted – see above comments.
	A brief mention of the mobility scheme was alluded to...that's ok if someone on state pension can afford the hire in the first place... its ok if they are able to actually get to where the mobility scooter can be collected; in addition, if you are elderly of have mobility problems and never used one before ... how effective would such a scheme be to those more vulnerable?	Please contact Westway Community Transport who operate mobility services in the Royal Borough via its website - https://westwayct.org.uk/services/rbkc-residents/ or call 020 8960 8774 weekdays between 1.00 pm – 4.00 pm.
Henry Dickens Court Residents Association	Thank you for the opportunity to comment on the above. The above Committee at their last meeting on 11th December discussed this item and commented that	Noted. The LIP references the Council's objections to the Mayor's plans to remove

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	<p>whilst they understood the reasons behind the strategy to target a far greater number of journeys on public transport and therefore fewer by private transport they were concerned whether the public transport system would be able to cope with significantly increased demand particularly when it had been heard elsewhere that double decker buses are to be replaced by single deckers.</p>	<p>some bus services and reduce others across the borough in Sections 2.4.14 and 2.11.1. A summary of our response to the Mayor's consultation can be found here.</p> <p>We are not aware of any plans to replace double-decker buses with single-decker ones. Our concern is that for the disabled, older people and people with children, using the top deck of a bus is not an option. So as far as these groups are concerned, all buses are effectively single deckers.</p>
<p>London Cycling Campaign</p> <p>About the London Cycling Campaign</p>	<p>London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.</p> <p>This response was developed with input from LCC's borough groups.</p>	<p>Noted</p> <p>Noted</p>
<p>General comments on this scheme:</p>	<p>This LIP is opposed.</p> <p>While the principles, priorities and targets enshrined in the LIP and largely taken from the Mayor's Transport Strategy (MTS) are welcome, there is no concrete action proposed</p>	<p>The Council rejects the suggestion that it is hostile towards Healthy Streets and improved conditions for walking and</p>

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	<p>likely to help the borough achieve those. And indeed there is evidence of deep hostility to the Healthy Streets framework, to increasing walking and cycling and reducing motor traffic embedded in the LIP.</p> <p>As such, this LIP can in no way help the council fulfil the aims of the MTS, nor is it likely to lead to improvements in walking, or cycling, or public transport in the borough.</p>	<p>cycling. The draft LIP sets out a large number of initiatives that we would not be pursuing if the Council were against Healthy Streets.</p>
Specific points on this scheme:	<p>The LIP sets out six objectives consistent with the MTS - the first being to “encourage more trips by walking, cycling and public transport”. The borough also highlights the top five concerns in responses to its 2018 Commonplace survey as being “cycling doesn’t feel safe, pollution, speed of traffic, too much rat-running, congestion for cars”.</p>	<p>Noted</p>
	<p>However, despite targets for reducing traffic volumes and car ownership in line with the MTS, there are no firm measures detailed to restrain private car use. There are no measures to address the concerns identified by the Commonplace survey or to enable walking and cycling.</p>	<p>This comment implies that car use can only be reduced through restraint measures. Car ownership has been falling steadily in RBKC and the LIP details measures which will continue and accelerate this trend. These include measures to support walking, cycling and public transport but also new initiatives such as floating car clubs.</p>

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	<p>The only mention of protected space for cycling is to note that it (as well as pedestrian crossings) result in a loss of capacity for motor traffic. While recognising the lack of an east-west cycle route through the borough the extent of support for CS10 is to “study carefully TfL’s developing designs and modelling of the impacts on the local road network”. The strong implication here is that the council views loss of capacity for motor traffic, and by association protected space for cycling and provisions for pedestrian crossings, negatively.</p>	<p>The text highlights the trade-offs involved in providing protected space for cycling. Registering concern about the impacts of reducing traffic capacity in no way suggests that the Council is hostile to providing protected space for cycling (or improved crossing facilities for pedestrians).</p>
	<p>On borough roads, cycling is only mentioned in relation to Quietway routes. However, in the absence of filtering traffic from residential roads such routes are unlikely to lead to an increase in cycling. The LIP rejects “large scale filtering” of roads since it “could lead to a less efficient use of the [main road] network”. Again, this implicitly not only suggests that the only efficiencies in the use of the network come from driving motor vehicles, but also that residential streets are an appropriate place for through motor traffic journeys.</p>	<p>Section 2.6.12 refers to TfL’s walking and cycling scheme on Holland Park Avenue/Notting Hill Gate. Both are borough roads.</p> <p>The point about filtering is correct: if traffic that currently uses a large number of minor roads is diverted onto a small number of major roads, this will increase pressure on those roads and result in reduced efficiency of the overall network. This is not to deny that there would also be benefits on the minor roads. Nearly all roads in the borough are residential, and there is unlikely to be a general consensus on which roads should exclude through traffic.</p>

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	We welcome the associated consultation on the introduction of pilot 20mph areas (see separate LCC response), but this should be contrasted with the blanket 20mph limits implemented by most other inner London councils.	Noted
General points about infrastructure schemes:	LCC requires infrastructure schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.	Noted. Our Transport Objective 1 is to Encourage more trips by walking, cycling and public transport and fewer by private car.
	As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.	Noted

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	<p>Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.</p>	Noted
	<p>All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.</p>	Noted
	<p>Evidence from TfL and from many schemes in London, the UK and worldwide shows the economic benefits, including to businesses, to be found from enabling a wider range of people to cycle more. Further evidence shows how cycling schemes also benefit air quality and reduce climate changing emissions, as well as improving resident health outcomes and reducing inactivity, as mentioned above.</p>	Noted
	<p>LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLoS) rating of 70 or above, with all "critical issues" eliminated.</p>	Noted

Who /Topic	Reference No / Comment	Response
Knightsbridge Association	<p>Thank you for the opportunity to respond to the above consultation.</p> <p>The Knightsbridge Association (“KA”) makes the following comments and requests RBKC to take these into account when implementing the plan (paragraph numbering as per your document):-</p>	
Borough Transport Objectives	2.1.5 The KA supports the Objectives, in particular items 1 and 3 (comments below, refer)	Noted
Air Quality	2.2.1.5 This paragraph makes no reference to PM2.5s despite the fact that these particles are a major threat to public health. The LIP is incomplete without an approach to, at least, measurement of small particulate matter recognising that RBKC’s statutory obligations only extend to PM10s – see 2.4.4 below.	Agreed – we will add a reference to PM2.5s and a concentration map to our final LIP.
	2.3.6 This is a fine aspiration but the KA is of the view that RBKC’s management of the public realm along the Brompton Road has not so far given rise to an “excellent outcome”. RBKC must accept an element of responsibility for the visible deterioration of the Brompton Road over the last 10-15 years – a view shared by the Chairman of RBKC’s Planning committee writing, in his personal capacity as a resident, in the Knightsbridge Association’s 2018 annual report due to be published late December 2018.	Noted - TfL is responsible for managing ‘Red Routes’ such as the A4, Brompton Road rather than the Royal Borough.

Who /Topic	Reference No / Comment	Response
	2.4.4 Despite the poll findings, the LIP focuses solely of PM10s. The LIP's proposals for tackling Air Quality will remain inadequate as long as RBKC is not prepared to acknowledge, through measurement and monitoring, the threat posed by very small particle emissions.	Agreed – we will add a reference to PM2.5s and a concentration map to our final LIP.
	2.9.5 and 2.9.6 RBKC's Green Fleet strategy, as announced 19 September 2018, needs to make explicit reference to contractor operated, refuse collection fleets (RCVs).	<p><u>The Green Fleet Strategy</u> refers to contractors and one of its commitments (page 3) is: <i>'The Council wants to lead by example in reducing the health and environmental impacts and carbon footprint from its own operations, which includes its vehicle fleet and those of its contractors, with a long-term ambition to move towards active travel.'</i></p> <p>The introduction of the Ultra-Low Emission Zone (ULEZ) in 2020, requires modification to some vehicles to ensure compliant with ULEZ". The Council's waste contractor is currently looking into renewing and retrofitting all their fleet to ensure compliance with ULEZ.</p>

Who /Topic	Reference No / Comment	Response
	<p>2.9.7 The KA suggests that it should be mandatory for waste management contracts to be retendered on the basis of a range of technologies including CNG, biodiesel Euro 6 diesel because we do not believe electric vehicle technology is sufficiently advances to provide a realistic RCV solution at the present time.</p>	<p>We are currently exploring our retendering options as the Council's waste management contract expires end of March 2021.</p> <p>The Strategy introduced a Green Fleet Procurement Process (see page 17) to ensure that each Council department and contractor follows the green procurement process and criteria.</p> <p>The strategy aims for the Council to use clean refuse vehicles to reduce air pollution and carbon emissions, encouraging low and zero emission models with low environmental impact where appropriate and of the technology available and financially and operationally feasible. If fleet managers and contractors are not able to comply with this requirement, a business rationale must be produced and other green options with low environmental options should be explored (as you've suggested for refuse collections).</p> <p>Contractors are requested to use the greenest technology available at present to fit operational needs and requirements to electrify the fleet (when technology</p>

Who /Topic	Reference No / Comment	Response
		<p>becomes available) are considered/will be included in the contract.</p> <p>Clauses around green fleet, the usage of ultra-low emissions vehicles (electric, hybrid depending on the technology available) will be included in the new contract and have already been included in other major contracts. Trials on electric refuse collection vehicles are taking place in London and electric alternatives are on the rise.</p>
	<p>Veolia operates a LNG refuelling station at Alperton for North London fleets. These fuels, while not zero emission at the tail pipe, are transitional fuels that offer better environmental outcomes than diesel, particularly with regard to NOx and SOx small particle emissions. Further advice is available from Doug Simpson at the GLA (doug.simpson@london.gov.uk)</p>	<p>The Council and our waste contractor are exploring greener options for their fleet and introducing vehicles with a low environmental impact (which will also satisfy service delivery). They are planning to try an electric refuse vehicle this year and electrical street sweepers. However, it has been flagged that the electric vehicle is not yet in place to meet all the service demands for this area without posing operational restrictions and the high costs cost for electric refuse trucks compared to standard ones.</p> <p>We appreciate the reference to other technologies and we will investigate them further and share this with the waste</p>

Who /Topic	Reference No / Comment	Response
		contractor. Also, we are in touch with TfL, Energy Saving Trust and will contact GLA as advised.
Pedestrian Crossings	<p>2.4.9 and 2.4.10 The environment for pedestrians and cyclist remains hostile given the poor Air Quality conditions and safety of pedestrian crossings in the Brompton Road.</p> <p>Bullet point three refers to A4 Brompton Road. There is no mention in the LIP of the need to upgrade the Brompton Square pedestrian crossing whose inadequacy is responsible for one fatality and a one serious injury. This has been the subject of a long and unsatisfactory correspondence with TfL, as reported in the Knightsbridge Association's Autumn Newsletter, copy available upon request (020 7823 9103).</p> <p>Please can we have support from RBKC to upgrade the Brompton Square pedestrian crossing because there is no reference to it at paragraph 3.7.9.</p>	<p>We support the upgrading of the Brompton Road / Brompton Square pelican crossing. This is already referenced as a 'live' TfL project in the eighth bullet point in Section 3.7.23 – Delivery Proposals on the TLRN - <i>A4 Brompton Road / Brompton Square pelican crossing - Upgrade to pedestrian crossing. Build expected 2020/21</i></p>
	<p>Another danger point not mentioned in the LIP is the pedestrian crossing at the junction of Queensgate and Prince Consort Road. Pedestrianisation of Exhibition Road has increased considerably traffic volumes in Queensgate and this calls for a corresponding reinforcement of pedestrian crossing arrangements in Queensgate.</p>	<p>Noted. Exhibition Road has not been pedestrianised. We will look into concerns regarding pedestrians crossing at the junction of Queensgate and Prince Consort Road.</p>

Who /Topic	Reference No / Comment	Response
Public Realm improvements	3.5.2 The KA did not support the 2017 consultation on improvement to the Sloane Street public realm. The KA is of the view that there are more pressing needs for improvement to the public realm than Sloane Street - the Brompton Road being one of them.	Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here . TfL is responsible for managing the A4, Brompton Road rather than the Royal Borough.
Milner Street Area Residents' Association Sloane Street – Public Realm Improvements	<p>The Milner Street Area Residents' Association ("MISARA") hereby requests the removal of the "Sloane Street – Public Realm Improvements" scheme from RBK&C's draft Third Local Implementation Plan (LIP) which was circulated by the Council for consultation on 22 November 2018. The main purpose of the LIP is to describe how RBK&C proposes to deliver the Mayor of London's Transport Strategy, as well as contributing to its own transport objectives.</p> <p>MISARA is the largest Residents' Association in Chelsea, with more than 230 subscribing member households. Our eastern boundary, Clabon Mews, is a few minutes' walk from the southern and central sections of Sloane Street.</p>	MISARA's comments focus solely on our plans for improving Sloane Street. These proposals have been subject to two public consultations and MISARA responded to both of them. The Council will make a decision on the way forward for the Sloane Street early in 2019 , which can be tracked here .
MISARA's Opposition to the Scheme	On 7 July 2016 we circulated the Council's consultation paper on the Sloane Street scheme (described as a "newsletter") to all our members, and asked them for their views. We put the question in a neutral and unbiased manner, without seeking to lead them to any	Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here .

Who /Topic	Reference No / Comment	Response
	<p>conclusion. The response from our members was strong and overwhelming opposition. <i>Not a single member of MISARA expressed support for the scheme.</i></p> <p>On 20 July 2016 we responded in detail to the Council. Our response can be read here:</p> <p>And on 23 February 2017 we responded in detail to the Council's second consultation: here</p>	
<p>Failure to support the Mayor's Transport Strategy outcomes</p>	<p>The Council has grouped the Mayor's desired Transport Strategy outcomes under three broad headings:</p> <ol style="list-style-type: none"> 1. Healthy streets and healthy people, including traffic reduction strategies. 2. A good public transport experience. 3. New homes and jobs. <p>Taking the second heading first, one of the most remarkable aspects of the Council's first consultation was that it did not seek to address what most people consider to be the main problem of Sloane Street, viz. the high level of congestion at the north end of the street. There are five main bus routes in the street, and it is bus passengers who are most badly (and unavoidably) affected by the congestion. Amazing to relate, <i>the Council's consultation paper did not even mention the word "bus"</i>. The proposed narrowing of the</p>	<p>The MTS itself groups its desired outcomes into three headings rather than the Council.</p> <p>We will add text under Section 3.5.2 to acknowledge that the Sloane Street proposals will not address the longstanding issue of traffic congestion on the approach to the very busy and complex junction with Knightsbridge. And that we will work with TfL and partners to see if any changes to the junction can be identified that would reduce congestion at the northern end of Sloane Street and through the junction in general.</p>

Who /Topic	Reference No / Comment	Response
	<p>carriageway can only make what is currently a bad public transport experience even worse.</p> <p>As to the first heading, the increased level of congestion would result in increased pollution, particularly from buses struggling to get through – the opposite of a more “healthy street”.</p> <p>As to the third heading, we do not see that the scheme will assist in creating any new homes or jobs.</p> <p>In conclusion, therefore, the scheme does not support the desired outcomes of the Mayor’s Transport Strategy but runs counter to them.</p>	<p>The MTS does not require all Borough LIP Delivery Plan proposals to address all of the MTS Outcomes.</p>
<p>Failure to support RBK&C’s own Transport Objectives</p>	<p>The Council has listed six “Borough Transport Objectives”:</p> <ol style="list-style-type: none"> 1. Encourage more trips by walking, cycling and public transport and fewer by private car. 2. Make our streets safer, secure and with fewer road collision casualties. 3. Make our streets cleaner and greener with less transport-related pollution. 4. Improve accessibility and journey time reliability on public transport. 5. Manage on-street parking and loading to make our streets more efficient. 6. Improve the appearance of our streets and ensure that they are well maintained. 	<p>Noted</p>

Who /Topic	Reference No / Comment	Response
	<p>The Sloane Street scheme would not improve bus services but would increase journey times and reduce reliability, contrary to objective (4). It would not encourage more trips by public transport but the opposite, contrary to objective (1). It would increase transport related pollution, contrary to objective (3) – and it should be recognised that the street could hardly be “greener” than it is already. Decluttering and repairing the fine York stone paving would certainly contribute to objective (6), though the construction of large flower beds with concrete seating (as depicted in the Council’s consultation materials) would crimp the space available to pedestrians and seriously detract from the dignified appearance of the street and the long straight green vistas we currently enjoy. We do not see that the scheme will significantly promote either objective (2) or objective (5).</p> <p>In conclusion, the scheme does not support RBK&C’s own Transport Objectives but runs counter to them.</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p> <p>The MTS does not require all projects in a Borough’s LIP Delivery Plan to address all of its desired Transport Objectives.</p>
<p>Widespread Opposition to the Scheme from Residents</p>	<p>In October 2016 the Council informed us that the comment cards sent in at the exhibition during the response to the first consultation showed that 65 individuals categorised as “businesses/workers” expressed support for the scheme, but only 13 “residents” did so. Given that the scheme was originated and has been heavily promoted by the Cadogan Estate, and that it was barely publicised amongst residents by</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>

Who /Topic	Reference No / Comment	Response
	<p>the Council at this stage, the preponderance of support from business interests is perhaps not unexpected. It is significant that the two largest residents' groups adjacent to Sloane Street – the Brompton Association and the Belgravia Residents' Association – were not notified of the first consultation. The third largest group (MISARA) was only notified at a very late stage – eight days before the opening of the exhibition.</p>	
	<p>The report written by the Council in March 2017 explaining the results of the second consultation (“Sloane Street: Analysis of Stakeholder Consultation”) noted that individual respondents to the questionnaire had expressed the following main themes:</p> <p>Against the proposals or widening of pavement/narrowing of road 137 Traffic congestion is a problem/will increase 134 In favour of scheme or one of the options 123</p> <p>And in 31 emails and letters received from individuals and organisations (such as MISARA), the following were the main themes:</p> <p>Against the proposals or widening of pavement/narrowing of road 16 Traffic congestion is a problem/will increase 13 Traffic control (road layout, traffic lights etc.)/pedestrian crossings 11 In favour of scheme or one of the options 8</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>

Who /Topic	Reference No / Comment	Response
	<p>These figures do not support the Council’s assertion that the scheme enjoys a level of support sufficient to warrant going ahead with its implementation (based on “maximum pavement widening”) – if anything, the opposite. An interesting fact discovered by MISARA, but not mentioned in the Council’s report, is that the emails and letters (which we have read) showed opposition to the scheme by 19-7. The report claims that “these can be seen in full in appendix three”, but despite our requests this appendix has never been put on the Council’s website. Even today, after 22 months, if you go to the “Sloane Street Consultation Results” page on the website, you will find the Council’s report but not this highly revealing appendix.</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>
	<p>Readers of the report would never imagine that opposition to some or all aspects of the scheme – in particular, the proposed widening of the pavements and narrowing of the carriageway – has been expressed not only by MISARA but also by the Brompton Association, the Belgravia Residents’ Association, the Knightsbridge Association and the Chelsea Society.</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>

Who /Topic	Reference No / Comment	Response
The consultation results cannot be relied upon	One of the most distressing aspects of the whole business, as we explained in detail in our letter of 23 February 2017, is that the Council’s consultation materials were so one sided, and the questions so loaded, that they could not possibly be used to derive an objective assessment of people’s views – they were clearly designed as a manipulative exercise to justify what the Council wanted in the first place. In fact it was a textbook example of a bogus consultation and nothing short of a disgrace.	Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here .
	The scheme has a bad smell to it, of manipulation and mendacity. It is based on a false claim – that the pavements in Sloane Street are “too narrow”. The cynicism of the claim is reinforced by the insertion of large municipal flower beds which would have the effect of <i>reducing</i> , not increasing, the amount of navigable pavement space available to pedestrians. The latest example of manipulation in an attempt to justify the scheme can be seen in the Council’s draft Hans Town Conservation Area Appraisal of October 2018, intended to replace the existing Hans Town Conservation Area Proposals Statement. This existing document states:	Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here .
	Sloane Street branches off southwards from Knightsbridge in a long uninterrupted vista line towards Sloane Square. The most characteristic visual element of the street is the long expanse of the mature gardens of Cadogan Place on its east side. In addition, the sense of openness of the street is established by the generous	Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here .

Who /Topic	Reference No / Comment	Response
	<p>pavement and road widths. Sympathetic tree planting is effective in nullifying the overpowering effect of the imposing buildings which line the thoroughfare and help minimise the disruptive effect of the incessant through traffic.”</p>	
	<p>In our response of 11 December 2018 to the consultation on this draft Appraisal, we wrote: “In the draft Appraisal we see to our surprise that the section on Sloane Street has been reduced to a handful of paragraphs, that all references to long green vistas and generous pavement widths have been removed.... We have to ask this question: has this tampering with the evidence base been made so as to facilitate approval of the Cadogan Estate’s unwelcome scheme to widen the pavements in the street, based on the ludicrous assertion that the pavements are not of “generous width” but “too narrow”? It is hard to avoid any other conclusion.”</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>
	<p>Council officers seem to take satisfaction from the Cadogan Estate’s willingness to pay for the entire cost of the scheme – the draft LIP gives a figure of £18 million, about three times the total amount of Borough funding for all “LIP delivery” projects over the three year period (£6.1 million). But this should set alarm bells ringing. The Cadogan Estate is not a charity, its commercial objectives are not those of residents, and the fact that it is willing to pay for the scheme does not turn a bad project into a good one. We do not blame Cadogan for</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>

Who /Topic	Reference No / Comment	Response
	<p>pursuing their own objectives - that is their job – but we do blame the Council, strongly, for having adopted Cadogan’s scheme and rebranding it as a scheme to “improve the public realm” whereas it would, in fact, disfigure it.</p>	
	<p>The process adopted by the Council to date bears a disturbing resemblance to its efforts to implement, ten years ago, an equally unwelcome scheme to turn Sloane Square into a crossroads. In that case, the effort started with the same claim that the square was “looking tired” (as with Sloane Street), ironically the result of the Council’s failure to maintain the paving in good order (as with Sloane Street); there were then two bogus consultations which purported to show that residents supported the scheme (as with Sloane Street); but the third and final consultation, conducted (for once) <i>by an independent firm</i>, showed opposition to the scheme by 72% to 28%. We believe that if the Sloane Street scheme were likewise to be made the subject of an independent consultation, it would show that residents do not support it.</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>
<p>Conclusions</p>	<p>There are a number of steps which could be taken to improve Sloane Street and which would command general support, as we have pointed out in our earlier letters. These include: decluttering; planting additional trees in the few spaces available where this could be done; repairing and reinstating the fine York stone paving where this has been neglected; and working with</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>

Who /Topic	Reference No / Comment	Response
	<p>TfL to mitigate the congestion at the north end of the street. The Council can do all of these things independently without imposing the Cadogan Estate's scheme. If Cadogan were still of a mind to be generous, we suggest that they be asked to contribute to the cost of restoring the York stone paving, as their shops and other properties in the street would clearly benefit from a restoration programme.</p>	
	<p>Councillors should not deceive themselves into thinking that Cadogan's scheme enjoys the support of residents. We are impressed that our councillors, in the wake of the Grenfell tragedy, have been at pains to emphasise a new approach whereby, instead of assuming that they know what is good for us better than we do, they will <i>listen to residents</i>. Their response to our request will be a test case of their new resolve.</p> <p>The opportunity is at hand. The Sloane Street scheme does not support the Mayor's Transport Objectives or the Council's own Borough Objectives. The scheme should be removed from the Local Implementation Plan and consigned to history.</p>	<p>The presence of a project or proposal in our LIP Delivery Plan does not mean it is set in stone. Large schemes such as Sloane Street are subject to detailed decision-making procedures outside the LIP process.</p> <p>All proposals within the LIP are subject to change throughout the LIP period. Section 3.1.15 states that "we will continue to review our priorities throughout the LIP period.....adjusting them as necessary and responding to changes in priority and circumstances."</p> <p>MISARA's objections to the Sloane Street proposals acknowledge that there are some improvements to Sloane Street that it would like to see. Removing the whole scheme from the LIP would not therefore be of benefit.</p>

Who /Topic	Reference No / Comment	Response
<p>The Chelsea Society</p>	<p>The Chelsea Society agrees with MISARA's response to the draft 3rd LIP, and you will recall what we said about Sloane Street at http://chelseasociety.org.uk/sloane-street/</p> <p>There is an admirable statement in para 1.1 of the Council's draft Code of Conduct in Planning Matters of the principles on which the Council's planning function is based:</p> <ul style="list-style-type: none"> • connecting with residents; • focusing on what matters; • listening to many voices; • involving before deciding; • communicating what we're doing; • inviting residents to take part; • being clearly accountable; • responding fairly to everyone's needs <p>However, the Code as actually drafted does not attach much importance to the needs or opinions of local people, and the Chelsea Society will be proposing some amendments very shortly.</p> <p>The Council could perhaps begin to implement these principles by attaching more weight to the considered views of The Chelsea Society and MISARA in relation to Sloane Street.</p>	<p>Noted. Please see the responses to MISARA's comments on the Sloane Street proposals above.</p>

Who /Topic	Reference No / Comment	Response
<p>Brompton Association</p> <p>Sloane Street – Public Realm Improvements</p>	<p>We are responding a couple of days late to the consultation about the draft Local Implementation Plan but I would be grateful if the Brompton Association’s response could be noted and taken into consideration and logged as part of the lip3 consultation.</p> <p>Like the Milner Street Residents’ Association, we urge the Council to remove the Sloane Street public real proposals from the Implementation Plan. The proposals drawn up by the Cadogan Estate are not appropriate for Sloane Street and have not been properly thought through and the design is very poor. We are aware that the Council is thinking of implementing this scheme - which is to be paid for by Cadogan. However, the proposals that were circulated for consultation some time ago showed a complete lack of understanding of the character of Sloane Street.</p>	<p>Noted – Please see response to MISARA’s comments on Sloane Street above.</p>
	<ul style="list-style-type: none"> • Narrowing the road will simply create more jams – particularly at the north end – than at present. The issue of congestion at the north end needs addressing. • Use of materials such as granite for paving is completely out of character. York stone should be used. In fact, there is already quite a bit of York stone paving in Sloane Street and it should be retained and not replaced. The existence of York stone in Sloane Street – and the need to protect is - noted in the recent draft Conservation Area 	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>

Who /Topic	Reference No / Comment	Response
	<p>Appraisal document which was circulated for comment only a few months ago.</p> <ul style="list-style-type: none"> • Treating the whole street in a uniform way is inappropriate. The central section is largely residential whereas the northern end has a distinct retail character, as does the southern end. Any scheme should reflect the character of the different sections of the street. • The use of planters will clutter pavements and particularly in the central section adjacent to Cadogan Gardens will look inappropriate. Small scale trees in planters will look dinky beside these lovely gardens. • The creation of parking bays for shoppers will simply encourage the kind of fast car problem that already exists in the Brompton Road. It will also exacerbate the congestion at the north end. • The overall design proposed by Cadogan is poor. It does not relate to the area. This street requires high calibre landscape design if lasting improvements are to be made. • Pavement areas immediately outside shops at the northern end do look messy with a range of finishes/luxcrete tiles etc. However, these areas are in the control of the shops themselves and Cadogan, not the Council. Unless these areas are improved, new paving in the street will be wasted. 	

Who /Topic	Reference No / Comment	Response
	<p>A great deal more thought needs to go into how Sloane Street might be improved and simply because the Cadogan Estate is proposing to fund their so-called public realm “improvements” is not reason for the Council to implement a flawed scheme without question. Residents’ views do need to be taken into account. The earlier consultation carried out by the Council was redolent of the “consultation” carried out regarding “improvements” to Sloane Square some years ago where the tone and direction of the consultation document was biased towards generating a positive “yes” outcome. As you know, in the event, this lamentable scheme for Sloane Sq had to be abandoned when it became clear that residents were wholly opposed.</p> <p>We consider the current proposals for Sloane Street are seriously flawed and need a great deal more work and consideration – and yes, proper consultation. Please therefore can this scheme be removed from the Local Implementation Plan.</p>	<p>Noted. The Council will make a decision on the way forward for the Sloane Street early in 2019 and which can be tracked here.</p>
<p>St. Quintin and Woodlands (StQW) Neighbourhood Forum</p>	<p>We are responding to this consultation exercise. The StQW Neighbourhood Forum has the same membership as the St Helens Residents Association, made up of 420 local residents in St Helens and Dalgarno wards. The neighbourhood forum is designated by RBKC, and the StQW Neighbourhood Plan was adopted by the Council in 2018 and forms part of the statutory development plan for the Borough.</p>	<p>Noted</p>

Who /Topic	Reference No / Comment	Response
	<p>While we welcome the long term aims of the Mayoral Transport Strategy and the RBKC LIP to reduce vehicle traffic in London to achieve 80 per cent of all trips in London by foot, cycle or public transport by 2041, as compared with 63 per cent today, we doubt the realism of this objective.</p>	<p>Noted – We agree that the overarching aim of the MTS and its related Outcomes and targets are challenging. However, we also know that London faces significant environmental challenges that require an ambitious level of action.</p>
	<p>We welcome the fact that the Council is paying some heed in the LIP (at 2.4.8) to the fact that changes in online retailing are generating very significant numbers of trips by delivery vehicles, while high street and neighbour-hood retail units struggle to survive in this new environment. This wording could be made less oblique and more stark. The same comment applies to use of taxi services in London by non-car owners, since the arrival of Uber.</p>	<p>Noted. We do not regard the draft wording as “oblique” but we agree that we should also amend the LIP to refer to the impact of new forms of private hire.</p>
	<p>Our local experience is that traffic congestion in our neighbourhood continues to increase. Our members have little confidence in projections produced by transport consultants engaged to support applications for further developments at White City and in the Old Oak Common and Park Royal Development Corporation (OPDC) Opportunity Area. There seems to be no attempt to factor into traffic projections the reality of the</p>	<p>The traffic projections provided in relevant transport assessments assume that a high mode share for active and sustainable travel will be achieved. Equally the projections assume that the ground work to engender better travel choices will be carried out. The measures set out in the LIP are part of that effort and will serve to greatly improve</p>

Who /Topic	Reference No / Comment	Response
	<p>impact of either Uber or Amazon, and related commercial firms.</p>	<p>connections for pedestrians and cyclists to White City and the OPDC. We agree that transport assessments should now consider the impact of internet related vehicle borne services – hitherto they have not. Such traffic has become a significant contributor to overall traffic levels in recent years. This is a global issue and we agree that measures to manage internet-related vehicle-borne services are required.</p>
	<p>In particular, we have serious concerns that Mayoral plans for an additional 24,000 new homes at Old Oak, with ‘car-free’ housing developments at densities of 600 units per hectare (as proposed in the OPDC Draft Local Plan, as the ‘average’ for Old Oak North as the first ‘wave’ of planned development) are unrealistic and based on inadequate analysis of the implications for the local road network. No radical changes are proposed for this network, which has been under increasing pressure since the developments at White City (including Westfield 1 and 2) have come on-stream.</p>	<p>The OPDC plans on doing everything they can to limit traffic generation. Nonetheless the 2015 Old Oak Strategic Traffic Study identified that traffic on North Pole Road / St Quintin’s Avenue would increase as a result of development at Old Oak.</p> <p>Our plans for the Kensal Canalside Opportunity Area include a new sustainable transport corridor linking Ladbroke Grove to Scrubs Lane, on a new street to the south of the main railway line.</p>

Who /Topic	Reference No / Comment	Response
	<p>As mentioned at 2.2.18 of the Draft LIP <i>North-south through routes are restricted because of the presence of the Westway, the Hammersmith and City Underground line, the Grand Union Canal, Holland Park and Kensington Gardens</i>. As one of few major north-south routes, Scrubs Lane/Wood Lane is being relied on to provide vehicle access to a series of major developments in White City and the OPDC area. As one of very few westward exits from North Kensington, North Pole Road sees queues of stationary buses and cars every weekday late after-noon. No resolution to this congestion is in sight, and proposals for improved access to the London Overground continue to go unheeded by TfL to date (see below). No changes to the North Pole Road/Wood Lane junction feature in the list of TLRN improvements at paragraph 3.7.23 of the Draft LIP.</p>	<p>We do not include this junction in our programme of improvements as it does not fall in this borough. However, we recognise that the performance of this important junction does have a bearing on traffic conditions within the Royal Borough. We expect the junction to get busier as developments at Old Oak are delivered. That being the case it would be apposite for TfL to review how the junction operates within the three-year implementation period. We will engage with TfL and LBHF to that end.</p>
Air Quality and Pollution	<p>We support the findings at 2.4.4 and 2.4.5 of the Draft LIP that air quality features at or near if the top of current resident concerns on local transport issues. This subject is raised regularly at our open meetings.</p>	Noted
Rail transport	<p>As noted at 2.4.15 and 2.4.16 <i>The renaissance of the West London Line (WLL) in the past decade is an opportunity to increase the public transport modal share. We share Hammersmith and Fulham's desire to see more frequent trains on the WLL to improve the public transport offer in the borough.</i> 2.4.16. <i>The WLL does not currently serve North Kensington but a new station</i></p>	

Who /Topic	Reference No / Comment	Response
	<p><i>between Shepherd's Bush and Willesden Junction would improve public transport.</i></p> <p>We ask that that this wording on the option of a new WLL station in North Kensington is strengthened further, and made specific to the location at 'Westway Circus' (southern end of Latimer Road W10) as promoted in recent years by the West London Line Group and in the StQW Neighbourhood Plan. TfL argues that a new station at this location would be too close to existing stations at Shepherds Bush and Willesden Junction. This carries little weight with local people, who are aware that the 'renaissance' of the London Overground network in East London has followed the building of several new stations on this section of the line, in close proximity to one another.</p>	<p>At this stage we consider it may be premature to be specific about exactly where on the West London Line a new station might be sited. The key is that it should deliver access benefits.</p> <p>Strengthen text at 2.4.16 to identify Westway Circus.</p>
	<p>It would be helpful if the RBKC LIP could look briefly beyond the Borough boundary, and include reference to OPDC and TfL proposals for an additional WLL station at Hythe Road. TfL have recently published the outcome of consultation on this proposal, which (unsurprisingly) was well supported by residents from an area with currently low PTAL levels. But such a station was costed at £198m in the TfL consultation. This proposition is now seen by local people as unlikely to happen, given TfL budget problems. A station at Westway Circus, with simple platforms and accessed via the planned Latimer Road/Wood Lane underpass, would be a far cheaper</p>	<p>We do not regard a Westway Circus station as an alternative to the proposed station at Hythe Road, which would provide an interchange between the West London Line and the Elizabeth Line, HS2 and other rail services. A Westway Circus station would have a local catchment, and no interchange. The two stations would be a reasonable distance apart. The demand for a station at Westway Circus would be likely to increase if the WLL connected to HS2 and the Elizabeth Line at Old Oak Common.</p>

Who /Topic	Reference No / Comment	Response
	option (the WLL station added at Imperial Wharf cost under £10m when built in 2009)	
	The West London Line Group has referred to such an option at Westway Circus as a potential ‘pop-up’ station, and this could well make sense for the 10-15 year period in which the extent and pace of regeneration and new housing development at Old Oak remains uncertain.	This wording implies a temporary station at Westway Circus, to operate until the opening of a WLL station at Old Oak. This does not seem realistic, given the capital costs involved.
The prospect of a Crossrail station at Ladbroke Grove	<p>This is referred to at 2.4.18 in the following terms: <i>We remain committed to securing a Crossrail station near Ladbroke Grove that would transform transport links to North Kensington and deliver huge regeneration benefits. We continue to work with Network Rail and local landowners to understand how we can seize this once-in-a-generation opportunity.</i></p> <p>With a new round of public consultation on the Kensal Gasworks site about to commence, it is important that the LIP includes an accurate forecast of the likelihood of this RBKC ambition being achieved. Public expectations should not be raised if such a station is now deemed highly unlikely, as seems to be the view of many of those who have followed the course of this project over recent years.</p>	An Elizabeth Line station remains part of the Council’s preferred plan for the development of the Opportunity Area. The wording of the draft LIP does not make any promises that the station will materialise.

Who /Topic	Reference No / Comment	Response
<p>Latimer Road/Wood Lane underpass</p>	<p>The current wording of 2.6.7 needs to be cross-referred to later sections of the document which explain how these ‘new pedestrian links’ across the borough boundary may come about.</p> <p>The current position on the proposed Latimer Road/Wood Lane underpass is covered at 2.11.14 and reads <i>We expect the underpass to be delivered in 2020, assuming stakeholders, including Network Rail, agree how the structure would be maintained into the future. We will also carry out public realm improvements adjacent to the entrance to integrate the new facility to walking and cycling networks.</i> Dates for the completion of this S106 commitment between LBHF and Imperial College had been put back on several occasions since the relevant agreements was signed in 2013. A meeting between Imperial, the StQW Forum, and Westway Trust is being held on January 15th to discuss the latest position. It would be helpful if the LIP could emphasise the importance of this project being seen through to completion.</p> <p>A subsequent paragraph in the Delivery chapter at 3.5.5. states <i>We would need to establish which organisation would be responsible for maintaining the underpass structure in the future. Assuming that we can resolve this issue, the new underpass could be delivered by 2021.</i> This is different from the 2020 date cited above and 2 years later than the Q3 2019 date which was previously provided by Imperial to the StQW Neighbourhood Forum</p>	<p>Agreed. At 2.6.7 add “as detailed at 2.11.3”.</p> <p>Add the following additional sentence under 2.11 “The Council considers the delivery of both links to be vital to engendering active travel and supporting the borough’s sustainable growth”.</p> <p>At 2.11.4 add “or 2021” after “2020”. This will address the discrepancy with 3.5.5.</p> <p>It is true there is repetition and some parts of 2.11.4 and 2.11.5 are more about delivery. The final part of 2.11.4 starting with “The design” could be deleted and integrated within 3.5.5.</p>

Who /Topic	Reference No / Comment	Response
	<p>and Westway Trust. It is not clear on what basis either 2020 or 2021 has been included in the LIP document, as a completion date for this project? The two separate paragraphs repeat similar information, and need to be edited.</p>	<p>The final part of 2.11.5 starting with “We expect... could be deleted and integrated within 3.5.6.</p>
	<p>The possible new pedestrian bridge across the West Cross route, referred to at 2.11.5 is a project at a much earlier stage. As we understand, no funding has been secured for the construction of such a bridge—only a potential S106 commitment to providing a ‘landing site’, as part of a development in the Freston Road EZ for which final planning approval has yet to be granted. A separate paragraph 3.5.6 explains the position more fully, while also repeating information. Again, we suggest that the LIP should not raise expectations on projects which remain as yet uncertain or unfunded.</p>	<p>We agree that the timely delivery of the bridge is very important. That being the case the Council is committed to part funding the bridge and we are confident that we could persuade TfL to contribute to the cost too. The thing holding us back is that we are yet to secure the requisite landing site close to Freston Road (a landing site on the Westfield side of the West Cross Route has been secured). The landing site will only become available when the adjacent development site comes forward. A recent planning application on that site was refused last year. A revised planning application has now been submitted to the Council for consideration. If that is approved and the development proceeds that would allow the Council to progress our plans for the bridge. Hopefully we will have greater clarity on the prospects for the bridge and potential timescales later this year.</p>

Who /Topic	Reference No / Comment	Response
<p>Kensal Gasworks site</p>	<p>We fully support the text at 2.14.5 which warns in relation to this site that <i>The delivery of high densities would be reliant on significant improvements to public transport access being made. An exclusive dependence on buses would exert additional pressure on the constrained site access. The fact that there might only be a single road access to the site would curtail the number of destinations that could be serviced by buses, subduing the potential to improve PTAL. This suggests that delivering the London Plan housing target, whilst optimising the site's development potential, would be challenging without an Elizabeth line station.</i></p> <p>Local residents fear that an Elizabeth Line station will not materialise, while the Mayor's London Plan will stick rigidly to a 3,500 housing target for Kensal Canalside. This figure is at the upper end of 3 housing target figures floated in the RBKC 2013 issues and options paper for Kensal Canalside. Should the Borough feel compelled to plan this Opportunity Area on the basis of this London Plan target, the outcome is likely to be an unsuccessful example of regeneration at excessive densities, on the Borough's last remaining major brownfield site.</p> <p>We look to the Borough's LIP, and future discussions with the GLA, to be very clear that '<i>dependence on buses</i>' is not a viable transport option for the future of Kensal Canalside. Connections through to the Old Oak area are also a major issue for which no specific or</p>	<p>The London Plan allocation of a minimum of 3,500 homes is part of the borough's development plan. We are bound to work towards achieving that target and that is our aim. Our emerging Local Plan affirms that the Council will review the capacity and masterplan for the Kensal Canalside site via an early review of the Local Plan if an Elizabeth Line station is not agreed.</p> <p>The Council's emerging Local Plan states that it is a Council "Priority" to "<i>deliver a new road linking onto Mitre Way near Scrubs Lane in the London Borough of Hammersmith and Fulham</i>" and to "<i>provide an integrated public transport network</i>". The future planned road link would enable better bus connections and a high quality walking and cycling route.</p>

Who /Topic	Reference No / Comment	Response
	obviously viable options have yet been published by either OPDC or RBKC.	
Delivery Plan	<p>Table 5 includes references to two projects in the StQW neighbourhood, with indicative budgets for 2019/20 and 2020/21:</p> <p><i>Healthy Streets Development and Implementation - St Helen's Gardens £45K £70K Environmental Improvements - North Pole Road £50K £50K</i></p> <p>More detail on these initiatives is given at 3.7.6 and 3.7.7. Both these initiatives would be welcomed locally, and we would hope for consultation on the detail (the St Helens proposals in particular will need dialogue with residents and shopkeepers in the street, and St Helens Church). Designs for refurbishment of the rail bridge in North Pole Road would also benefit from input from local residents. The StQW Forum would be happy to work with RBKC on both consultation exercises.</p>	Noted
Kensington Society	I am responding on behalf of the Kensington Society to your consultation letter of 22 November seeking comments on the Draft Local Implementation Plan (LIP). The Society covers the whole of the borough north of Fulham Road.	

Who /Topic	Reference No / Comment	Response
<p>Is this really a consultation?</p>	<p>The Society welcomed the consultation through the Commonplace survey. We are, however, concerned that this is the first time that the Kensington Society has been consulted on this document, essentially the finished document. This appears to be the “full statutory and public consultation” mentioned in para 1.3.5, and yet it looks a lot like “business as usual”, rather than one prepared with early public engagement let alone an opportunity for co-design that would reflect the culture change post Grenfell.</p> <p>You do mention, in para 1.3.1, two Transport Focus Workshops held in July, but, when we spoke you told me that those who attended were invited by your consultants and expressly did not include your “usual consultees”, such as the Kensington Society, as you “already know their views”. There should have been a wider dialogue with residents through early engagement in helping to develop and shape this longer-term strategy and to help select projects that will deliver it over the next ten years. This was a missed opportunity.</p> <p>The Commonplace survey, which we welcome as a means of tapping people’s concerns, primarily dealt with traditional “transport issues”, rather than the wider range of issues that the LIP is now trying to cover (see below). Unlike your annual Transport and Highways Work Programme which until now has been a closed process, the LIP’s choice of projects, which is the first three years of a long-term programme, could have been informed by</p>	<p>Noted</p> <p>The timetable for developing LIPs is set by the Mayor of London, not boroughs. That timetable, coupled with the borough elections in June, meant that we had no opportunity for any specific pre-engagement with residents before the summer holidays. We do however benefit from continuous dialogue with large residents’ groups including the Kensington Society on issues of direct relevance to the LIP. We did however take the short window of opportunity in July opportunity to carry out two Transport Focus Workshops with people who live, study, or work in the borough. We recruited these people through a market research company.</p> <p>Noted.</p>

Who /Topic	Reference No / Comment	Response
	<p>a discussion of priorities as well as being able to consider additional proposals. At this stage in the process, it is difficult to see what it is that you are consulting us about. For example, if revitalising our town centres – from the major centres to local neighbourhood centres – is a key place-making issue, then there should be some discussion of the range of issues that would come under this heading and how it would be delivered.</p> <p>What is disappointing, therefore, is that for the first opportunity post Grenfell to engagement in helping shape the medium- to long-term strategy it has not been possible for the Society to contribute. The next opportunity will not be for another 3-4 years, unless you now develop a longer-term strategy for the borough's public realm. Nevertheless, there should be an opportunity to discuss the Capital Programme and the annual Transport and Highways Work Programme, but even that has already been done 2019/20 – 2021/22 and this submission subsumes one of the council's main programmes. To enrich future consultation, it should be possible to build consultation into your annual cycle and, perhaps, even co-opting representatives from the Kensington and Chelsea Society to the Transport Reference Group.</p>	<p>Section 3.1 sets out how we develop our Programme of Investment. We consult locally and extensively on even the smallest of schemes before implementing them and to ensure that we get them right.</p> <p>The Council is indeed reviewing the way it engages with residents post the Grenfell tragedy. However, the Mayor of London's timetable for developing LIPs predated the outcome of that on-going review.</p> <p>The Transport Policy Reference Group was disbanded in 2010.</p>
Coverage:	The Mayor's Transport Strategy has a wider set of goals than previous LIPs, with a strong emphasis on Healthy Streets, which covers a range of issues from:	

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	<ul style="list-style-type: none"> • a major change in the proportion of trips to be made on foot, by bicycle or using public transport, which for <u>this Borough</u> means a shift from 76% in 2015 to 85% by 2041 (need to amend para 1.1.4) – this will need clearer targeting of resources – RBKC should be able to boost walking and bus use; and • the changing the character of our streets/public realm, especially our shopping streets but also our residential areas, by making them more attractive places to be in, not just to travel through. This should be a major, long-term theme – whilst a few small projects are included, other town centres and neighbourhood centres in Kensington, including Notting Hill Gate, Holland Park Avenue and Gloucester Road South. <p>The latter is not just a “transport” issue, but a corporate one, especially the need to improve the environment in our town centres, not just our main centres but also our neighbourhood centres. This would require a public realm strategy designed to make them more attractive places, covering everything from better pedestrian crossings and more cycle parking, through providing seats and drinking fountains and planting trees to removing the clutter, especially advertisements and surplus telephone kiosks. This would involve a joint strategy and packaging funding from several business groups, such as planning, transport and the</p>	<p>The contextual reference in para 1.1.4 to the Mayor’s goals for mode share across London, rather than in the Royal Borough itself, is correct and does not need to be amended.</p> <p>The Policy Context section 2.3 makes clear that the Local Plan’s objectives on strong neighbourhoods and an attractive public realm are among the planning policies that form the context for the LIP.</p> <p>However, the point is accepted, and the final LIP will include a reference to the cross-departmental working to improve the vitality of Kensington High Street under Section 2.9.</p>

Who /Topic	Reference No / Comment	Response
	<p>environment. Westminster has a major SPD on this issue</p> <p>Although the Lead Member and the Executive Director cover the full range of these issues, it is not clear to what extent the LIP or the priorities of the Highways and Transport and Planning Departments cover all of the above issues, even though the six Borough Transport Objectives in para 2.1.5 would seem to cover them.</p>	
<p>Overall assessment</p>	<p>Despite the comments above, the Society would like to congratulate the Highways and Traffic Department on an excellent document, which sets out the main transport-related issues very well. The comments below:</p> <ul style="list-style-type: none"> • suggest the need for further analysis of in what ways local circumstances influence the needs of RBKC, especially the opportunities for building on the advantages of walkable communities; • recognise the challenges of changing modal split – increasing the share of trips on foot, by bicycle and by public transport – which will only be achieved by improving conditions for walking and cycling, but also by improving the attractiveness of the public realm. This will need a coordinated programme of action covering transport, planning and the environment business groups; and • suggest greater community engagement, both in generating these programmes and the individual projects. 	<p>Noted</p>

Who /Topic	Reference No / Comment	Response
General Comments:	<p>Section 2.2: This sets the context – demographic, density, housing, etc – but is largely descriptive, and does not explore the implications for how we travel, car ownership, the density of bus routes, public transport accessibility levels.</p>	Noted
	<p>Section 2.3 This sets the policy context: The number 1 theme in the Local Plan is Keeping Life Local (see para 2.3.3): The key objective is to maintain walkable neighbourhoods – having all the main local services, amenities and social infrastructure within easy walking distance – 300m-400m for the most local facilities, 600m-800m for GP surgeries and up to 1,500m for less local facilities library, sport facilities and hospitals. The chart below – taken from a Residents’ Panel Survey ca 2010 – illustrates how far people consider they are prepared to walk. This I part of a presentation I gave at the European Transport Conference in 2013 (attached)</p>	Noted

Who /Topic	Reference No / Comment	Response																																																	
	<p style="text-align: center;">How far should people be prepared to walk to reach facilities?</p> <table border="1" data-bbox="595 395 1299 742"> <thead> <tr> <th>Total</th> <th><5 minutes</th> <th>5-10 minutes</th> <th>11-20 minutes</th> <th>> 20 minutes</th> <th>DK/NA</th> <th>No response</th> </tr> </thead> <tbody> <tr> <td>Local Shops</td> <td>26%</td> <td>50%</td> <td>17%</td> <td>2%</td> <td>1%</td> <td>4%</td> </tr> <tr> <td>Post Office</td> <td>17%</td> <td>54%</td> <td>23%</td> <td>2%</td> <td>4%</td> <td>0%</td> </tr> <tr> <td>GP Surgery</td> <td>14%</td> <td>46%</td> <td>33%</td> <td>3%</td> <td>1%</td> <td>5%</td> </tr> <tr> <td>Library</td> <td>4%</td> <td>22%</td> <td>54%</td> <td>13%</td> <td>2%</td> <td>6%</td> </tr> <tr> <td>Sports facilities</td> <td>2%</td> <td>22%</td> <td>47%</td> <td>17%</td> <td>5%</td> <td>7%</td> </tr> <tr> <td>Hospital</td> <td>3%</td> <td>17%</td> <td>46%</td> <td>26%</td> <td>3%</td> <td>5%</td> </tr> </tbody> </table> <p style="text-align: center;">RBKC Residents' Panel Survey</p> <p style="text-align: center;">Very local = <10 mins/<800m: local shops, post offices; GP surgery Local = 10-20minutes/800-1600m: library, sports, hospital</p>	Total	<5 minutes	5-10 minutes	11-20 minutes	> 20 minutes	DK/NA	No response	Local Shops	26%	50%	17%	2%	1%	4%	Post Office	17%	54%	23%	2%	4%	0%	GP Surgery	14%	46%	33%	3%	1%	5%	Library	4%	22%	54%	13%	2%	6%	Sports facilities	2%	22%	47%	17%	5%	7%	Hospital	3%	17%	46%	26%	3%	5%	
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Hospital	3%	17%	46%	26%	3%	5%																																													
	<p>The key message, that is central to the LIP, is that, with the advantage of high population densities, RBKC is uniquely well-placed to maintain walkable neighbourhoods and that these must be supported by the Council through its planning and transport policies, education and libraries, as well as working with partners such as NHS/WLCCG for planning the distribution and nature of primary health provision. An example would be planning for future GP surgeries being relocated in more accessible locations such as Notting Hill Gate. Maintaining walkable communities means supporting, maintaining and protecting local neighbourhood centres through planning policies, ensuring that they remain attractive places through public realm policies and that</p>	Noted																																																	

Who /Topic	Reference No / Comment	Response
	they feel safe with lower traffic speeds and good pedestrian facilities.	
2.4 Changing the transport mix	2.4.8 The issue of home delivery of goods by light vans, but also by motor bikes is a growing problem, both in terms of additional traffic, congestion and pollution, as well as for motorbikes/scooters the driving styles and speed.	Noted
	2.4.9/2.4.10: It should be possible to map and prioritise action to overcome problems for pedestrians on TLRN , with assessments and monitoring based more on improved pedestrian conditions and increased use, rather than a reduction in casualties.	TfL is responsible for managing the TLRN. We will share your suggestion with officers at TfL for consideration. TfL has identified several locations in the borough where it wishes to improve conditions for pedestrians.
	2.4.11 Telephone kiosks and advertising: the latest Government consultation on changing permitted development rights (consultation closes: 14 January) may be an opportunity to get Government action. The Society strongly supports the Council's approach to tackling these developments.	Noted
	2.4.12 Making the best use of the highway – the footway plus the carriageway – is essential. Moving toward more efficient use of space will mean a certain amount of redistribution as the current arrangements do need some adjustments.	Noted

Who /Topic	Reference No / Comment	Response
	2.4.13 Despite recognition of air quality and the quality of the local environment generally, people's behaviour is often at odds with their concerns. However, cleaner vehicles are not the answer as that still leaves many other problems, such as congestion, casualties and community severance which also need to be tackled.	Noted
	2.4.16 The Society supports a new station between Shepherd's Bush and Willesden Junction	Noted
	2.4.18 The Society considers that the Council will need to reduce the scale of development on the Kensal site if the Crossrail station does not materialise, otherwise there could be extreme congestion on Ladbroke Grove.	The scale of development will indeed be affected by the quality and scale of transport infrastructure. The London Plan allocation of a minimum of 3,500 homes is part of the borough's development plan. We are bound to work towards achieving that target and that is our aim. Our emerging Local Plan affirms that the Council will review the capacity and masterplan for the Kensal Canalside site via an early review of the Local Plan if an Elizabeth Line station is not agreed.
2.5 Mayor's Transport Strategy outcomes	The Society supports the proposed outcomes	Noted

Who /Topic	Reference No / Comment	Response
2.6 London's streets will be healthy and more Londoners will travel actively:	2.6.4 The Society supports new formal and informal pedestrian crossings. We strongly support installing benches where there is a known demand, such as at bus stops and in shopping areas.	Noted
	2.6.5 The Society strongly supports keeping footways clear of clutter, including tables and chairs, A-boards and telephone kiosks/advertising panels, and improvements to pedestrian facilities.	Noted
	2.6.7 The Society supports new pedestrian links from North Kensington to Wood Lane.	Noted
	2.6.8 The introduction of 20mph speed limits both on individual streets and some 20mph areas would tackle a range of environmental issues not just speed and rat-running. The current consultation will help define priorities for 20mph measures.	Noted
	2.6.12 The Society supports Quietways, but is uncertain about proposals for Cycle Superhighway 10 on Holland Park Avenue, Notting Hill Gate and Bayswater Road.	Noted
	2.6.14 The Society supports the Borough's objectives to support outcome 1	Noted

Who /Topic	Reference No / Comment	Response
2.7 London's streets will be safe and secure	2.7.6 The Society supports the Mayor's Vision Zero Road Safety Action Plan which seeks to find new ways of tackling accidents/casualties, especially on TfL roads, including on-street speed enforcement through speed cameras and where appropriate speed indicator signs.	Noted
	2.7.11 The introduction of 20 mph limits on residential roads could be beneficial, but will depend on local support.	Noted
	2.7.13 The Society, whilst recognising that hostile vehicle mitigation measures may be necessary in a few places, these need to be sensitively designed.	Noted
2.8 London's streets will be used more efficiently and have less traffic on them	2.8.1 The Society strongly supports a tougher approach to minimising the extent and duration of road works and to restrict parking suspensions for construction work to the minimum necessary, with a presumption against materials, equipment and skips on the street.	Noted
	2.8.5 The Society considers that car clubs should be supported to help residents who are considering moving from owning a car which requires on-street parking to using a car club vehicle as and when they need it.	Noted
	2.8.7 The Society is increasingly concerned about major traffic generators like Westfield and the proposed development at Olympia, as well as some religious	Noted

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	buildings, is resulting in increased pressure on streets close by in this borough.	
	2.8.9 Residents are becoming increasingly concerned about lack of enforcement against abuse of one-way streets and would strongly welcome the Council taking on enforcement powers for moving traffic offences , as well as enforcing school travel plans to reduce congestion in the morning peak around schools.	Noted. Other than under planning conditions, there are no other powers available to local authorities to enforce School Travel Plans.
2.9 London's streets will be clean and green	2.9.4 The Society supports differential charging for older diesel vehicles but consider that the differential is too small to influence people's choices. The same is true for the differential for second or more additional parking permits.	Noted
	2.9.8 The Society supports tree planting and the introduction of SUDS in public realm projects.	Noted
	2.9.9 The Society supports the installation of on-street parklets in support of more seating, planters, cycle parking and public art to liven up our streets, especially our shopping streets.	Noted
	2.9.10 The Society supports further measures to tackle car use and air quality around schools.	Noted

Who /Topic	Reference No / Comment	Response
2.10 The public transport network will meet the needs of a growing London	2.10.1 With the pressures to redesign the master plan for Earl's Court, consideration should be given to providing a new interchange between underground and overground at Earl's Court, rather than at West Brompton.	While there might be benefits in linking Earl's Court directly to the WLL, it is premature to include a reference to such scheme in the LIP.
2.11 Public transport will be safe, affordable and accessible to all	2.11.3 The Society supports improved pedestrian links across the West London Line between North Kensington and White City.	Noted
2.12 Journeys by public transport will be pleasant, fast and reliable	2.12.1 The Society supports increasing the number of Countdown signs at bus stops, giving priority to stops which serve 2 or more routes.	Noted
2.13 Active, efficient and sustainable travel will be the best option in new developments	2.13.1 The Society strongly supports locating high trip-generating uses in areas well-served by public transport, securing improvements to public transport including step-free access incorporated in development proposals at underground stations and that all new residential developments will be residents' parking permit free and any car parking must be at or below the Council's maximum parking standards. We also strongly support zero parking/car-free developments in locations with good accessibility to public transport, certainly in PTAL 5 and 6 locations and perhaps PTAL4.	Noted

Who /Topic	Reference No / Comment	Response
	2.13.8 The Society strongly supports that redesign of the Earl's Court Opportunity Area should improve upon the earlier master plan to ensure that sustainable, active travel and an improved public realm are an integral part of the redesign.	Noted
	2.13.11 The Society supports the securing step-free access to the underground at Notting Hill Gate, High Street Kensington and South Kensington, but also at Ladbroke Grove and Latimer Road.	Noted
2.14 Transport investment will unlock the delivery of new homes and jobs	2.14.1 The Society is concerned that in the event of no Crossrail station being built at Kensal Canalside then the housing allocation of 3,500 for the Opportunity Area will need to be scaled back, as the other measures, listed in para 2.14.4, would be insufficient to support such a large allocation. This is acknowledged in paras 2.14.5-7.	Noted
3. The Delivery Plan	<p>Table 2: Linkages between LIP projects and programmes and the Mayor's Transport Strategy outcomes:</p> <p>This table "ticks the boxes", but gives no indication of the degree to which they contribute to the outcomes – a simple scoring system could do this.</p>	Noted, but any simple scoring system would be largely a matter of subjective judgement, and would be of limited value.
	3.4.5 Funding: The Society agrees that the LIP allocation will need to be supplemented by the borough's Capital and Parking Reserve budgets, plus S106 funds earmarked for transport, highways and public realm	Noted

Who /Topic	Reference No / Comment	Response
	<p>improvements. This is reflected in Table 3. This only covers projects identified for implementation in the next three financial years.</p>	
<p>3.5 Long-term interventions</p>	<p>Table 4: Long-term interventions up to 2041: The Society supports these schemes.</p> <p>The Society is, however, disappointed that there is no provision for:</p> <ul style="list-style-type: none"> • a scheme for improving the public realm in Notting Hill Gate; • a series of town centre improvement schemes, other than Golborne Road, St Helen’s Gardens and North Pole Road (which are in the 3-year programme) – there needs to be a rolling programme for such improvements, even though the priorities have not yet been established. The document does not highlight public realm improvements, including clearing the clutter, seating, etc to create more attractive centres. 	<p>TfL’s plans to improve walking and cycling facilities along Notting Hill Gate provide a clear opportunity for public realm improvements. There is no point in the Council pursuing a separate scheme at this stage.</p> <p>It is premature to set out a list of schemes beyond the three-year programme. Priorities and opportunities will change during that period.</p> <p>We address public realm improvements including reducing street clutter in our rolling programme of Area Reviews, as detailed in Sections 3.7.2 to 3.7.3, as well as discrete streetscape improvement schemes.</p>

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Table 5: Three-year Indicative Programme of Investment for the period 2019/20 to 2021/22	This is in effect the Highways and Traffic Work Programme for 2019-20 – 2021/22 – will there be a separate Key Decision – it is not in the current Forward Plan. What consultation is proposed?	The departmental work programme will be subject to approval through the Key Decision process in March 2019 as in previous years. Anybody can comment on a Key Decision by emailing Cabinet.coordinator@rbkc.gov.uk or calling Governance Services on 020 7361 3945/2947.
Detailed Comments:	2.2.2 Kensington and Chelsea is not a Central London Borough, apart from small slivers of Knightsbridge, the South Kensington Museums and a small part of Kensington Gardens, Kensington Palace and Kensington Palace Gardens, about 90% of the borough is outside the Central Activities Zone/Central London (ie it is in Inner London). As a result, instead of having a 2041 Central London modal split target of 95% walking, cycling and public transport, the target for RBKC would be at least 90%.	Noted. TfL has set us a target of 85% of trips by walking, cycling and public transport (Table 7) which we have accepted.
	2.2.3 Change “Kensal Green” to “Harrow Road”, which runs along most of the northern boundary.	Agreed
	Map 1: This does not show much “detail” – why not focus in on Inner West London? Map 2 provides more detail	This map simply shows the location of the Royal Borough in relation to the rest of London.
	2.2.4 Working age is more than “between 20 and 50” - perhaps up to 65?	Agreed.

Who /Topic	Reference No / Comment	Response
	2.2.6 Disproportionate infers that it is too large – should be “a high proportion”.	It is disproportionate in relation to some other boroughs and parts of the UK.
	2.2.9 Does the daytime population mean night-time population, plus those coming to work, education and tourists, less people going out of the borough to work, education, shops, etc?	Agreed – update figure and add a definition.
	2.2.11 Why are low rates of owner-occupation “unsurprising”? Delete	Agreed.
	2.2.12 80% of households are in flats. 80% of households are either 1 or 2-person households – this is a one end of the spectrum. This influences low car ownership rates.	Agreed
	2.2.15 What are the implications of being an Air Quality Management Area for nearly 20 years?	The implication is quite simply that we, along with TfL, GLA and the UK Government, need to take strong actions to reduce harmful emissions.
	Map 6: remove No 10 bus route and rename it as 23. More changes for 11 and 19?	We will update the public transport map in the final approved version of our LIP.
	2.4.1 TfL statistics for 2015 show that 76% of trips were made on foot (37%), cycle (4%) and by public transport (35%). This placed Kensington and Chelsea 9 th equal out of 14 Inner London Boroughs, only 8 th equal for walking, despite the likely higher proportion of short trips and relatively flat terrain. The best chance of increasing	Noted

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	the walking/cycling/public transport share of trips would be by making walking more attractive.	
	2.4.4 For borough residents, tackling pollution, speed of traffic and rat-running – essentially tackling the environmental problems caused by traffic seem to be the obvious targets, in order to promote health and wellbeing.	Noted
Westminster City Council	It's advised that the City Council broadly supports the direction of the strategy and we look forward to working with your team over the years to come on any emerging mutual schemes or projects	Noted
London Borough of Wandsworth	<p>We welcome the aspiration for mode shift to walking, cycling and public transport. If you are successful this will assist us in achieving our own objectives and targets for mode shift, as many journeys are cross-borough.</p> <p>We do not have any specific comments on schemes in the three-year corridors and neighbourhoods programme, but look forward to being consulted at an early stage on any schemes brought forward during the life of the LIP that would have an impact on Wandsworth.</p>	Noted

Who /Topic	Reference No / Comment	Response
Visitor	The cycling aspirations are too vague. You need to build protected cycle lanes, filter side streets by mode, and implement and enforce a 20 mph limit.	All of these points are covered in the draft LIP. Segregated lanes and filtered lanes are not the only ways to improve conditions for cycling. The Council does not have power to enforce speed limits but we have selected streets for our 20mph pilot scheme which we consider have a strong chance of achieving high compliance.
Resident	I would like to see the elimination of buses driving down small street during school drop off and collection e.g. Queensberry Place	Queensberry Place forms part of the route of the 345 service. It would not be practical to divert it during school arrival and dispersal times.
	It seems more about Holland Park and South Chelsea than addressing problems of pollution, noise, pavement overcrowding and in responsible buses/lorries in the tourist area of South Kensington.	Noted
	Planting on Cromwell Road a good idea.	Noted
	Be useful to have speed humps or the measure on Queensberry Place to stop the speeding down this road	Noted
	Implement further parking restrictions across South Kensington to include all areas 8am - 10pm 7 days a week - visitors, casino visitors etc... are using value	A map of the prevailing resident parking hours of control can be found here . We do review hours of control in particular areas at the request of residents and residents'

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	resident parking spaces early evening and across the weekend.	associations, subject to public consultation. Requests for extending the hours of control, along with contact details so we can follow up, can be sent to traffic@rbkc.gov.uk
	More dustbins in the South Kensington area - there are fewer now than a few years ago but the numbers of visitors and fast food outlets has increased.	We will pass your request to the relevant Council Department.
Resident	Any throttling of traffic will increase pollution, not cut it. Central London grinds to a halt with the slightest nudge (accident, utility work, demonstration, marathons, etc) and the plan would make it worse	We have no plans to “throttle” traffic.
	It has been written with the sole justification of punishing motorists and reducing space available, making jams worse. I did not see anything about enforcing laws against cycle behaviour.	This is not the Council’s intention. The main thrust of our LIP is to achieve the transport objectives listed in Section 2.1.5. Only the police have the powers to enforce illegal cycling behaviour.
	You will not speed up bus travel if you throttle the streets. How do you expect to improve shopping, eg Sloane Square, if delivery vehicles cannot get in or are slowed down.	We have no plans to throttle traffic or prevent access to premises by delivery drivers.
	How will you reduce car ownership without infringing the rights of individuals to enjoy liberty. What are you going to do about the increasing number of cyclists who create danger by flouting traffic lights.	The LIP contains no proposals that threaten the ‘liberty’ of car owners. Only the police have the powers to enforce cyclists ignoring traffic lights.

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Works in the borough	Objective 1 - should be to 'Enable' walking and cycling, not 'Encourage'. To encourage implies that you will do next to nothing to change the infrastructure, and try to get people to use unsafe facilities, which is unrealistic.	Noted. 'Enable' implies that there is no existing infrastructure, which is not the case. We therefore prefer 'Encourage'.
	No mention of dangerous cycling conditions on Chelsea Embankment or Exhibition Road, despite them being some of the most agreed with topics on the Common Space consultation. No mention of traffic evaporation and modal shift when reducing car facilities, something that has been evidenced around the world. No mention of reintroducing the Western Congestion Charge, or another form of road pricing to correctly price the negative externalities of motorised transport. 2.4.12 states that cycling is controversial even when it does not impact traffic. This is cowardly, and says that the council is scared of a noisy minority of bullies and would prioritise them over vulnerable road users.	The LIP text makes clear that there is work to do to improve conditions for cycling on borough roads (Chelsea Embankment is a TfL road) and discusses the challenges inherent in achieving these improved conditions. This is in the section called "Challenges and opportunities". One important such consideration, for a democratic body like a council, is that the removal of general motor traffic capacity is not widely supported.
	Many of the items are vague and do not seem to have measurable success criteria. There is no mention of any segregated cycle facilities, despite there being evidence that this is the best way of enabling cycling, and one of the most requested facilities on commonspace. No mention of modification of parking policies, and aligning residents' parking costs with the true costs of storing	The Council's objective is to raise cycling rates by providing better facilities for cycling; it does not start from the position that this can only be achieved through segregation. TfL has provided design standards that set out the conditions in which segregation is needed. It is

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	<p>vehicles on some of the most valuable land in the world. Also no mention of introducing CPZs to discourage short and unnecessary car trips.</p>	<p>reasonably obvious that a route on Holland Park Avenue would have to involve the provision of a separate bike track. We have said that we will consider TfL's plans for this scheme carefully.</p> <p>It is true that we have not suggested linking the price of residents parking to the cost of the land. To do so would imply that we should do the same for cycle parking. We would not wish to do this.</p> <p>RBKC is a small borough, and is unusual in allowing permit-holders to park on residents bays across the borough. Removing this facility would probably reduce the number of short journeys by car in the borough, but would be a socially divisive step, and there is little evidence of support for such a move.</p>
	<p>A very unambitious and poor draft. It will do very little to enable active travel and discourage car use. No mention of the income levels of those who own cars in the borough, just unevidenced statements on how cars are essential to the vulnerable. No mention of the proportion of the borough who don't own a car, I assume to hide the fact that car ownership is something only a minority in the borough have. Not a single mention of segregated cycle facilities. 2.13.6 - it is unclear how a</p>	<p>The draft text notes that car ownership in the borough is relatively low; we are happy to include a reference to the car ownership rate and the fact it is falling, in the final draft. There is no statement on how cars are essential to the vulnerable in the draft LIP.</p>

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	wide pavement and narrow road is good for cycling. Please explain this.	<p>There is a brief discussion of protected cycle facilities at 2.4.12-2.4.13.</p> <p>The Council's objective is to raise cycling rates by providing better facilities for cycling; it does not start from the position that this can only be achieved through segregation. TfL has provided design standards that set out the conditions in which segregation is needed. It is reasonably obvious that a route on Holland Park Avenue would have to involve the provision of a separate bike track. We have said that we will consider TfL's plans for this scheme carefully</p> <p>Narrow carriageways encourage lower speeds; it is accepted that wider pavements are not themselves helpful or unhelpful to cycling.</p>
Works in the borough	Suggest changing 'encourage' in objective 1 to 'ensure'	We have limited powers to 'ensure' more trips by walking, cycling and public transport and fewer by private car, but we can encourage it and, in certain cases, make it easier.
	2.6.4 Should introduce double yellow lines in front of all dropped kerbs where feasible.	We consider installing double yellow lines in front of dropped kerbs on a case-by-case basis, rather than a borough-wide

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		policy. We also enclose a leaflet reminding people not to park across dropped kerbs with the letters that we send to residents whose car parking permits are due to be renewed. Over the course of a year we will therefore have written directly to all residents who have an RBKC parking permit.
	2.6.9 Need to provide protected space for cycling to encourage it - at the moment, too many of the boroughs roads are too dangerous to provide for safe cycling.	The Council's objective is to raise cycling rates by providing better facilities for cycling; it does not start from the position that this can only be done through segregation. TfL has provided design standards that set out the conditions in which segregation is needed. It is reasonably obvious that a route on Holland Park Avenue would have to involve the provision of a separate bike track. We have said that we will consider TfL's plans for this scheme carefully.
	2.6.12 'We will study carefully' to 'We will support'	We will not know whether we can support TfL's proposals until we see its detailed plans.
	3.7.12 Produce protected space for cycling on the borough's roads.	See response to comment on Section 2.6.9 above.

Who /Topic	Reference No / Comment	Response
Visitor	Need to focus more on motor traffic reduction and work with TfL to deliver safety improvements on the borough's roads for cyclists. Not enough focus on improving the area for pedestrians and cyclists.	Our Delivery Plan details our proposals for cycling and walking.
	Need specific measures for supporting safer routes for cycling on the borough's main roads to help deliver motor traffic reduction.	The Council will continue to expand its network of cycle routes on minor roads. On the main roads, we are reviewing the cycle lanes on Ladbroke Grove, and are working with TfL on proposals for Holland Park Avenue and Notting Hill Gate.
Resident	The "boutique" hotel in my street caused congestion, traffic queues and idling engines by the large number of of Ube's, private limousines taxis in my street at Egerton Gardens. There is no regulation of these vehicles blocking up the street and holding up traffic thereby increasing air pollution.	See comments above regarding 'idling engines' enforcement.
Community or Voluntary organisation in the Borough	Cycling needs the greatest prominence	Noted
Cadogan Estates	Responded that they agree with the proposed transport objectives, the transport challenges and opportunities and proposed Delivery Plan actions in our Consultation Draft LIP.	Noted

Who /Topic	Reference No / Comment	Response
Resident Transport Objectives	Inadequate on immediate actions which could and must be taken NOW to reduce some aspects of air pollution - which other London boroughs have introduced, successfully. RBKC is slow and behind the curve on this. Act radically and rapidly to reduce, widely, 20mph limits, and enforce: the Earls Court Road 20mph restriction has been in place for some time but is never, ever, enforced and is therefore a joke.	Section 2.7.11 outlines our plans for consulting on some pilot 20 mph streets and areas across the borough. As a 'Red Route', the Earls Court Road 20 mph speed limit was installed by TfL and speed enforcement is the responsibility of the police.
	Immediately enforce the penalty (pathetic though it is) for engine idling - Council contractors and staff must have this as a priority (overstretched or not enough Council staff?). Education and sensitisation on pollution from idling is fine and dandy, but is long term and without teeth - so act to enforce and in parallel act with City Hall to ratchet up the inadequate penalty for idling.	See previous response above on idling vehicles.
	Objectives need to be timelined, and properly monitored. Priority must be given to early action to reduce pollution - recognised by both science and consultation respondents as a major problem.	Noted.
Transport Challenges and Opportunities	All good to excellent - but how long will it take to grasp the opportunities and resolve the challenges? Other London boroughs' successes and action on counter-pollution measures should embarrass RBKC.	Noted. You can find our latest plans to address air quality here .

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Resident Transport Objectives	Your objectives do not address the fact that over 30% of the traffic is HGL/LGV/tradesman vans etc. who are entering/driving through the borough each day. It falls short of challenging their impact on our community. There is no mention of the impact of idling vehicles on residents.	We are not aware of any traffic data that breaks down the make-up of vehicular traffic in the borough as you suggest. Section 2.4.8 does however note the need for greater awareness of the traffic impacts of the shift to home deliveries. See previous response above on idling vehicles.
Transport Challenges and Opportunities	You have not addressed the need for instead of less single deliveries the introduction of click and collect systems - especially at all tube stations. You have not addressed the need for more integrated business deliveries and rubbish collection.	Noted. Section 2.4.8 acknowledges the growth in the number of light vans on our streets as a result of on-line shopping deliveries.
	The dog-leg pedestrian crossings on Cromwell Road are a deterrent to walking and crossing the road. Pedestrians now cross by weaving between vehicles as it's the only way to make it across the road in one light change. PEDESTRIANS DO NOT WISH TO WAIT FOR TWO LIGHT CHANGES TO CROSS CROMWELL ROAD. THIS IS AN ACCIDENT WAITING TO HAPPEN.	Noted - As a 'Red Route', TfL is responsible for managing Cromwell Road, rather than the borough. We will pass your concerns on to colleagues at TfL.
LIP Delivery Plan	Your action plan is about new initiatives not how to control and contain the traffic coming daily into the borough. The over 30 per cent of our traffic that is HGV/LGV/tradesman/deliveries these are NOT electric and are high polluters. There are no initiatives for these polluters.	Noted – Section 2.9.10 references the Mayor of London’s proposals to expand the ULEZ to include the borough in October 2021, and that we would like to see that expansion occur sooner.

Who /Topic	Reference No / Comment	Response
	There are no proposed actions to stop stationary idling vehicles. There are no proposed actions to work with other boroughs to solve these problems.	See previous response above on idling vehicles.
	We are not all suddenly walk or leap onto a bike. Cars and especially buses/trucks are not suddenly going to move to electric. Indeed the uptake of electric is incredibly slow. Move actions need to be taken to mitigate the traffic and pollution we are facing rather than Utopian thinking.	Noted.
Business within Kensington and Chelsea Transport Objectives	The objectives are incomplete, and fail to implement the Mayor of London's transport strategy.	If the Mayor of London considers that our LIP will not help implement his Transport Strategy he will not approve it.
	Your asking for LIP funding to implement the MTS - the days of pork barrel cash from TfL to splurge on local nonsense are over.	LIP funding is allocated annually to all boroughs by TfL on a formula basis rather than boroughs asking for it. Section 3.4.3 acknowledges that LIP funding is decreasing.
	RBKC's support for active travel - walking and cycling - is paper thin.	The Council rejects this assertion. Our Delivery Plan sets out our proposals for cycling and walking.

Who /Topic	Reference No / Comment	Response
	<p>These proposals do not satisfy the MTS requirements, nor address the real requirement for safe cycle routes east-west across the borough. RBKC's Conservative administration - and its transport officers - have been obstructing TfL and the Mayors for years. Without a safe, segregated east-west cycle route of the quality achieved with newer cycle superhighways, this LIP proposal is incomplete.</p>	<p>If the Mayor of London considers that our LIP will not help implement his Transport Strategy, he will not approve it.</p> <p>TfL has not yet consulted on its proposals for walking and cycling improvements on Holland Park Avenue / Notting Hill Gate, and the LIP refers to this potential scheme.</p>
<p>Transport Challenges and Opportunities</p>	<p>You state in paras 2.4.3 and 2.4.4 that cycling doesn't feel safe, yet RBKC fails in these proposals to address that with high quality cycle routes, especially east-west across the borough. RBKC's Conservative administration and its highways officers have been obstructing TFL's and the Mayors' plans for years. This needs to stop. You acknowledge the requirement for east-west cycle routes in 2.4.12 and 13, then provide pathetic excuses to continue your obstructive stance. You are failing to implement the MTS.</p>	<p>Noted. If the Mayor of London considers that our LIP will not help implement his Transport Strategy, he will not approve it.</p> <p>The Council did not support plans for a segregated cycle route along the length of Kensington High Street but we are working with TfL on improvements to walking and cycling on another important radial corridor across the borough, as is mentioned in the LIP.</p> <p>The text highlights the trade-offs involved in providing protected space for cycling. Registering concern about the impacts of reducing traffic capacity in no way suggests that the Council is hostile to providing protected space for cycling (or improved crossing facilities for pedestrians).</p>

Who /Topic	Reference No / Comment	Response
	<p>In para 2.6.8 you state the Exhibition Road is the only one currently with a 20mph limit. The shared space design has failed. The council's own analysis of motorised traffic speed shows that 85 per cent traffic now exceeds 20mph for the majority of the day (85 per cent is now 27mph?). The design has failed, and there's been no enforcement. The MTS fails to address and correct either.</p>	<p>We are working with the Exhibition Road Cultural Group, residents and ward councillors, to develop measures to improve public safety in Exhibition Road.</p>
<p>LIP Delivery Plan</p>	<p>There is so little content in the "delivery plan", it is difficult to support it. There are no dates, risks or dependencies.</p>	<p>The Delivery Plan sets out our proposals for 2019/20 and the three-year 2019/20 to 2021/22 LIP period. We update our programme annually and will refresh our Delivery Plan for the next three-year 2022/23 to 2024/25 LIP period in 2021/22, subject to TfL guidance when published. Section 3.8 and Table 6 address risk.</p>
<p>Business within Kensington and Chelsea</p> <p>Transport Objectives</p>	<p>The whole approach seems rather half-hearted, I'm afraid: it's as if you intend to propose small changes in order to keep things substantially as they are.</p>	<p>Noted. We think that the cumulative impact of the proposals in our Delivery Plan will help us achieve our Transport Objectives and the MTS outcomes.</p>
<p>Transport Challenges and Opportunities</p>	<p>Some opportunities seem to have been deliberately discounted and ignored. Note the breath-taking switch from 2.7.6 to 2.7.7 in which the naive claim is made that it's unclear what a proactive strategy would look like (2.7.6) - to the implication that if only TfL would do a</p>	<p>The text reflects the difficulty that boroughs will have in prioritising between multiple requests for traffic calming, using only a subjective assessment of risk. There is no criticism of TfL in our</p>

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	decent job then 30per cent of those casualties might be eliminated anyway (2.7.7).	comment – it simply states the reality that some of the most dangerous junctions are not under our control. We welcome Vision Zero and will continue to work with TfL to reduce casualties on borough roads and the TLRN.
LIP Delivery Plan	Your method seems faulty here - the crosses against the MTS outcomes give no indication of the *extent* to which those outcomes are delivered (such as "high", "medium", or "low" extents) and therefore no possibility of a COBA assessment of the proposed actions.	Noted – Assessing the extent to which our LIP proposals support each MTS outcome would be a subjective exercise and therefore be of little benefit.
Works in the borough Transport Challenges and Opportunities	Encouraging more trips by walking and cycling is too weak. You should focus on enabling active transport by making changes to the transport realm. Research shows Londoner's wish to use more active transport measures but do not feel safe. Encouraging people into environments they perceive as hostile and unsafe will not work.	The majority of the physical measures proposed in our LIP Delivery Plan will help enable active travel. We believe travel training and travel planning also play their part in enabling active travel. So far in 2018/19 we have delivered over 1000 adult cycle training sessions. Of those, over 170 were at Level 3 – cycling on major routes and through complex junctions – the third highest of all London Boroughs.
LIP Delivery Plan	The plan for cycling is insufficiently bold. Sweeping roads as your primary strategy to encourage cycling is paying lip service to the idea of encouraging active transport while avoiding taking hard decisions. It won't encourage cyclists who do not feel safe in traffic. Extra	The Council's objective is to raise cycling rates by providing better facilities for cycling; it does not start from the position that this can only be done through segregation. TfL has provided design

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	<p>cycle parking will not help get people who do not already cycle. The Quietways are not fit for purpose - I cycle on Exhibition Road every day alongside coaches, lorries and other heavy traffic. Other boroughs have managed to achieve modal shift by providing segregated space for cycling. The proposals to allow cyclists to do some maneuverers forbidden to cars can be helpful but it takes a very confident cyclist to go against hostile traffic. Kensington and Chelsea's lack of ambition in tackling one of the key priorities identified by their own residents is disappointing. You would do well to look at other local borough such as Camden and Hackney who have taken much bolder steps, and Waltham Forest/Enfield who have created actual living streets.</p>	<p>standards that set out the conditions in which segregation is needed. It is reasonably obvious that a route on Holland Park Avenue would have to involve the provision of a separate bike track. We have said that we will consider TfL's plans for this scheme carefully</p> <p>The Council agrees that there is more that could be done to support a growth in cycling, and whilst it would never expect cycling infrastructure schemes to be supported universally, its level of ambition must reflect what its residents say – for example through consultation such as this exercise.</p>
<p>Studies in the borough</p> <p>LIP Delivery Plan</p>	<p>You have not made any useful provision for cycling or walking. It is a copout.</p>	<p>Our Delivery Plan sets out our proposals for cycling and walking. The Council does not agree that these proposals have no use.</p>
<p>Metropolitan Police</p>	<p>On behalf of the Commissioner of the Metropolitan Police I have no comment to make regarding traffic management matters within the draft LIP. I have forwarded this email to our Design Out Crime Officer, who may wish to comment on Security and Hostile Vehicle Mitigation.</p>	<p>Noted</p>