

## **London Councils' response to the public consultation on the Draft Mayor's Transport Strategy**

### **Introduction**

1. London Councils has worked closely with TfL and the GLA in the development of the new Transport Strategy and is grateful for their willingness to engage with our Members and borough officers. We are pleased that many of the issues we have raised in the course of our work on the MTS over the last two years have been addressed.
2. We welcome the opportunity to provide further views and comments on the Public Draft of the Mayor's Transport Strategy (MTS). In preparing our response to this consultation we have continued to focus on those issues that we highlighted in response to previous consultations, particularly that on the Statement of Intent (Sol) in July 2009. This response sets out those issues that we continue to feel have not yet been fully addressed in the draft Strategy and we have chosen not to answer the specific consultation questions directly.
3. The current review in parallel of the MTS, London Plan and Economic Development Strategy (EDS) provide an important opportunity to deliver a clear programme for the future of transport in London within the context of an overarching spatial strategy which sets out clearly the locations for particular types of development in London and the transport investment needed to support that development. It is essential that boroughs are involved in shaping all these strategies and we have taken this opportunity to consider all three strategies together.
4. One overarching concern we have is the assumption that London's economy will continue to grow in the longer term that underpins all three strategies. There is no consideration of alternative scenarios or of the impact of different rates of growth. The MTS should consider the impacts of slower growth rates on the demand for transport and the wider consequences of alternative patterns of growth. Given the current uncertainty about the length and depth of the current recession, London Councils would like the Mayor to test alternative economic and employment growth scenarios in terms of the transport implications for different parts of London. For example, taking account of different projected export performance, different levels of recovery in consumer spending levels, different levels of public spending reductions etc.
5. Our specific comments on the MTS are set out below.

### **Integration with the London Plan, EDS and other policy areas**

6. Whilst we recognise that it is not possible for the draft strategy to anticipate all the developments in other policy areas over the period of the plan we believe that it should say more about how changes in other policy areas will be taken into account. For example, the implementation plan in Chapter seven does not say anything about engagement with other policy areas. In addition, the link between investment in transport infrastructure and areas of economic growth is not always clear, particularly as there is little spatially specific detail in the EDS.
7. The transport investments proposed in the MTS need to be brought together with the strategic Opportunity Areas and Growth Corridors in the London Plan

and the schedule of infrastructure projects that will direct LDA and other public investments. This would provide clear links between the three strategies and acknowledge the key role that transport investment plays in increasing economic potential and bringing forward investment. It would also provide a framework for a discussion about the priority areas for investment across London, and the contribution of different agencies, including the boroughs, in delivering this.

8. The London Plan, and policies in the MTS, identify Metropolitan centres as key growth areas and Proposal 5A in the EDS refers to 'removing barriers to outer London fulfilling its potential'. However, the proposals in the MTS do not provide certainty that the transport infrastructure and services will be delivered to support this. For example, the MTS policies are likely to lead to an increase in bus fares and a reduction in the total mileage of bus routes (as set out in the TfL Business Plan 2009/10-2017/18). As many parts of Outer London rely heavily on bus improvements to facilitate improved access to its town centres for local people, these proposals are inconsistent with the objectives of the EDS and London Plan.
9. In addition, the policy with regard to land safeguarded for transport use in the MTS should be consistent with that given in the London Plan. The London Plan refers to safeguarding land that already has a transport function or that will have committed transport developments. The MTS goes further and includes land that is well located to the transport network and could offer potential transport functions. We suggest that the London Plan definition be adopted in both documents.

#### **Integration with other strategies outside London**

10. We also believe that there needs to be clearer information about how the Strategy will link to relevant strategies outside London and greater consideration of transport links to key population centres outside London. The Mayor should work with relevant boroughs to ensure that the transport strategies of areas surrounding London are aligned with London's goals, and should aim to address shared challenges.
11. There is reference to TfL's ongoing discussions with SEERA and EEDA via the Inter-Regional Forum but we believe that it would be helpful to give a stronger role to the Inter-Regional Forum (and will propose this in our response to the London Plan) and that the MTS should set out exactly what the Inter-Regional Forum's role should be in relation to transport.

#### **The needs of local vs. long distance transport**

12. We support investment that makes local journeys easier and which encourage Londoners to make more sustainable travel choices. However, we also recognise that national rail plays an important part and that London's travel needs do not stop at its borders. Ensuring that the heart of Britain's economic engine is connected properly and effectively with the region and the rest of the country is essential and we welcome such investment as is necessary to maintain this.
13. We also recognise that the detail on local services is not for the MTS and believe that boroughs are best left to determine this detail for themselves. However, the MTS needs to provide the framework in which this can happen as transport services which provide for long distance commuting do not always meet the needs of London's residents and businesses. In particular,

the MTS needs to set out how the need for local transport services will be balanced with the needs of long distance commuting, for example, how will the needs of local passengers be taken into account in the development of proposals in support of high speed rail. We believe that Policy 2 should be amended to include a requirement to consider the impact on local services when introducing new services for long distance travel.

14. London Councils has previously suggested that major strategic transport projects in London should be controlled by TfL given their over-arching strategic responsibility for transport in London and we support the Mayor's desire for TfL to have greater control over rail in London even where it does not actually manage the rail network. We wish to see TfL use this greater control to ensure that the needs of local journeys are prioritised.
15. Maintenance is another crucial issue in providing for the needs of local travellers, particularly those on foot or by bike. Whilst the draft MTS is not the place to provide detail on the funding available for maintenance, there are a number of proposals which relate to this. Unfortunately none of these say anything explicitly about the maintenance of footways and cycleways. For example, proposal 35 which sets out a commitment to maintain the network assets refers only to the road network and proposals 82,83 and 84 which relate to achieving 'better streets' do not mention maintenance. We believe that one of these proposals should be amended to ensure that adequate funding is available for the maintenance of footways and cycle routes.

#### **Clarity about what is achievable and deliverable within the timescale of the MTS**

16. We are pleased to see that the draft Strategy includes an Implementation Plan which sets out clearly which schemes are funded and which are in development stages. We also note that the draft Strategy contains greater detail on how funding will be sought and secured. However, we have some concerns about policy 32 regarding funding for buses (this is discussed further under transport opportunities for all below).
17. We are also pleased that the draft Strategy provides further information on TfL's priorities for further capacity beyond the schemes that are already committed. We note that Proposal 9 states that the Mayor will undertake a review of the Crossrail 2 (Chelsea Hackney) route to ensure it is providing the maximum benefits and value for money. However we are concerned that no timescale is provided for this. We believe that this review should be time and scope limited to ensure that TfL is in a position to lobby Government for funding for this, in time for spending decisions on Network Rail's next control period (2014-2019), and to ensure a unified and comprehensive London-wide lobbying position.
18. We believe that high priority also needs to be given to increased rail investment across London. There is a particular need for improved southeast to northwest transport links so we are pleased to see that the Mayor has included the Bakerloo Southern extension in the list of proposed schemes. However, we are disappointed that this is not anticipated to be completed until after 2020 and we would like to see it given higher priority.

#### **Encouraging modal shift**

19. In our response to the Sol we called for greater emphasis on policies which encourage local journeys to be made on foot or by bicycle, including in Outer

London. We are pleased to see that the draft MTS sets out a commitment to promote walking, cycling and the use of public transport and aims to increase the mode share of these journeys. We welcome the proposals relating to cycling including those on 'Biking boroughs', cycle training, raising awareness and cycle parking.

20. We also welcome the proposals on walking including those relating to better journey information and the completion of seven Strategic Walking Network Routes. We are particularly pleased to see the proposal relating to the Key Walking Route approach as this is something we called for in 'Breaking down the barriers to walking in London' which we published jointly with Living Streets and Walk London last year. However, we are still concerned that many of the proposals for encouraging cycling, such as cycle highways and the cycle hire scheme have focused on Central and Inner London boroughs. We believe there is scope to develop such measures in Outer London too and that the strategy should say more about how this will be achieved.
21. In our response to the Sol we also said we would like to see a thorough review of the approach to 'road safety' and 'traffic calming' schemes, so that they are also evaluated in terms of their contribution to sustainable transport and environmental objectives. We continue to support the need for such a review and would also like to see boroughs given greater influence over speed limits on the TLRN in their area to ensure that they are able to address road safety effectively.
22. We note that the draft MTS does not advocate a road user hierarchy. We continue to believe that the transport strategy must encourage people to make smarter travel choices following a sustainable hierarchy of transport modes: putting walking above cycling, cycling above public transport and public transport above the private car. Without such a hierarchy, the many other aspirations in the strategy, which we welcome, will not come to fruition. We would encourage the Mayor to introduce policies that go beyond simply leaving it to people's individual choices and to set out a policy framework that actively discourages less sustainable modes of transport. We recognise however that, particularly in parts of Outer London, this will require transport investment to ensure a viable alternative to the private car exists and the Mayor should work with boroughs to ensure that this takes places.
23. We also note that there is still no reference to a London Walking Plan which we believe should be a key priority. This should not be a prescriptive plan but is a way of formalising the Mayor's support for walking whilst still giving boroughs the local flexibility needed to achieve improvements in walking.
24. In our response to the Sol we said that we would like to see a greater role for car clubs in the Strategy as we believe they have a key role to play in encouraging modal shift. We are pleased to see that there is now a proposal to promote the use of car clubs.

#### **Encouraging polycentric development**

25. We note that the Mayor has accepted the Outer London Commission's recommendations that future growth should be based around existing town centres and that the transport focus should be on improving connectivity into and between these centres. We welcome this move away from a focus on a few 'strategic centres' and believe that the MTS should support transport

which recognises and values the needs of Outer London and encourages polycentric development around existing town centres across London.

26. We also note that there are a number of policies and proposals to support the Central Activities Zone. However, although Inner London should benefit from many of the broader proposals as well as projects such as Crossrail and further potential schemes such as Tube extensions and rail improvements, there are no measures specifically aimed at addressing radial capacity in and through Inner London and we would not wish to see the focus on Outer London come at the expense of Inner or Central London.
27. We support the proposals in the MTS to improve orbital links between town centres but we are concerned that the emphasis is primarily on better journey planner information and improved integration between transport modes rather than new infrastructure or services. We believe that improved high quality bus links should be provided where it is not possible to provide rail links. This should include limited stop 'express buses' for journeys that can not easily be made by rail.
28. We do not believe that the Mayor has given adequate consideration to the need for new infrastructure particularly if planning for the levels of growth that the Strategy is based on. We would like to draw attention again to the statement in our response to the Sol that decisions on investment in transport infrastructure should reflect the parts of London where significant population and employment increases will take place. Additionally, investment in transport will also be required elsewhere to encourage modal shift and to address areas of transport deficit, and areas of social deprivation more generally.

#### **Reviewing bus route planning**

29. Proposal 23 states that the bus network will be kept under regular review, and that potential changes would be subject to cost benefit analysis. London Councils has been calling for an extensive review of bus route planning to ensure that it meets the needs of Londoners and visitors to London in the 21<sup>st</sup> century by making the system more logical and easier to understand and use. We believe this review should focus on how the bus network operates strategically rather than on a route by route basis or focusing on the contractual arrangements. The review should also look at the types of vehicle used, and whether there is scope to use smaller vehicles on quieter routes or at quieter times of day and at ticketing flexibility, including learning from good practice on this issue elsewhere. It is not clear that the review referred to in Proposal 23 will address these issues and we would like to see this proposal amended to refer to a much wider ranging review which London Councils and the boroughs would be involved in the development of.

#### **Future developments on road pricing**

30. We note that the Mayor ruled out any extension to road pricing when speaking to the London Assembly on 14 October 2009, stating that he had 'every intention of not extending congestion charging in London'<sup>1</sup>. However, in a letter sent to London Councils' Chairman, Cllr Merrick Cockell on 12 October 2009 the Mayor says that there could be a role for road pricing in London if this is considered necessary to meet the objectives of the strategy,

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<sup>1</sup> Mayor's Question Time (14/10/09)

<http://www.london.gov.uk/mgt/public/supplementaryquestion.do?id=15329>

e.g. in meeting environmental objectives, but any scheme would need to take account of local conditions, and be fair and flexible. We would therefore like clarity on the Mayor's position on road pricing and a clearer framework in the MTS as to how those boroughs who wish to, could develop their own road pricing schemes. This is particularly important given that recent changes in legislation give boroughs greater scope to introduce their own charging schemes but they would still require confirmation from the Mayor before doing so.

31. We would also like to see a commitment in the strategy to reviewing the existing payment collection methods for the congestion charging scheme to ensure the scheme is not heavily geared to securing revenue from fines, or making it unnecessarily difficult to pay.

### **Addressing the impacts of climate change**

32. We welcome the proposals set out in the draft strategy for reducing carbon emissions (95-108) and Policy 24 which states that the Mayor will take the necessary steps to achieve the required contribution from ground based transport to achieve a 60 per cent reduction in London's CO<sub>2</sub> emissions by 2025 from a 1990 base.
33. We note that although CO<sub>2</sub> emissions will be reported annually in the Travel in London report it is still not clear what criteria or timescales the Mayor will use to determine whether his current policy approach to achieving reductions in CO<sub>2</sub> emissions is working. For example, it is not clear at what point the Mayor would decide that more direct intervention is required to reduce emissions in the Capital. We believe that the MTS should include interim targets to allow progress towards the 60 per cent reduction by 2025 to be judged and ensure that further interventions are introduced in sufficient time to allow this target to be met. We also believe the Mayor should set explicit targets for reducing bus and taxi emissions (proposal 91) and we recommend that the development of low emission taxis be treated as a priority (proposal 26).

### **Improving Air Quality**

34. We note that the draft strategy sets out a number of measures to improve air quality including behavioural change, reducing emissions from public and private fleets and tackling air quality 'hotspots' as well as further use of the Low Emission Zone. We will comment further on these in our response to the Air Quality Strategy. However, we are concerned about proposal 92 which includes the incentivising of low emission vehicles through pressing for changes to parking regulations. We believe firmly that it should be for individual boroughs to decide the levels of parking charge in their area. We would also like the MTS to indicate what the Mayor's contingency plan is if the government fails to obtain extensions for achieving the NO<sub>2</sub> and PM<sub>10</sub> European targets.
35. We continue to support the promotion of electric vehicles in principle and note that the draft strategy contains a number of measures to incentivise them. However, we are concerned that there are no specific proposals to ensure that electric vehicles do not add to parking stress and congestion and do not detract from walking and cycling. The Mayor must continue to work with boroughs on this.

### **Airport Capacity**

36. We welcome the Mayor's commitment to continue opposing any further increases in capacity at Heathrow but would like to raise some concerns about the Mayor's approach to airport capacity as set out in proposal 47. London Councils strongly opposes any further expansion of Heathrow Airport, as we believe it will have significant impacts, particularly on air quality and noise pollution, for the capital's residents.
37. London Councils also accepts that there may be a need to provide further runway capacity in the South East, but opposes the use of a 'predict and provide' policy to airport development. In no other form of transport is it accepted that we should pay for and provide for all forecast growth and it is not clear why air transport should be treated differently. London Councils would like to see the adoption of a 'time phased' approach to development through a "plan, monitor and manage" approach, which, supported by continuous monitoring of the industry, would reveal what further provision was needed. This should be carried out before decisions are made regarding what level of additional airport capacity is required.
38. In addition, London Councils supports looking at alternative ways of managing or even reducing the demand for air travel by innovations in high speed rail links, the level of aviation fuel tax, as well as at other alternatives to expansion at Heathrow, including better use of London's other airports and the rest of the UK's regional airports.

### **Transport opportunities for all**

39. We note that the strategy contains proposals to improve the physical accessibility of the transport network and that improvements will be targeted at strategic locations such as town centres and around accessible stations. We support this approach but believe that the Mayor should work with the boroughs to identify the places most in need of accessibility improvements. We continue to believe that there is room to consider greater flexibility in the standards relating to accessibility and would like to see this issue addressed in the MTS.
40. London Councils continues to believe that greater consideration needs to be given to the affordability of public transport in order to ensure that all Londoners can benefit from it. In this respect, we have some concerns about policy 32 and Proposal 119 which suggest that bus fares may be increased in order to reduce the level of bus subsidy and ensure that fares provide an appropriate level of contribution to the cost of providing public transport. We recognise that decisions on bus and tube fares are for the Mayor but we would like to see a clear indication in the MTS of what the Mayor's pricing strategy will be going forward, given that the TfL business plan has now been published. We would encourage the Mayor to approach this subject with sensitivity, seeking to avoid disproportionate price hikes which will impact most on the poorest people in London or those who rely most on public transport. We are concerned that 'ensuring the affordability of public transport fares' has been removed as a key outcome since the Sol was published in May 2009.
41. We note that the Mayor proposes to keep the range of concessions available under review to ensure that they are available to those who most need them. We believe that the concessions available to young people in full time education should be extended to those on apprenticeship schemes. At the

moment many of the 16,000 apprentices in London pay full adult fares as they do not officially meet the eligibility criteria for student Oyster cards which would entitle them to concessionary travel. This means that many are spending a significant proportion of their income on travel (most apprentices in the private sector earn only £95-£110 per week). We believe that a minor amendment to the eligibility criteria should be made to allow this group of young people to access the same benefits as those in full-time education. This would be in line with both the Mayor's and the boroughs' support for apprenticeships.

#### **Integration between modes**

42. We welcome the proposals in the draft MTS to improve interchange and integration between modes and the specific measures set out to achieve this. We are also pleased to see that the Sub-Regional Transport Plans will build on this to identify particular improvements with input from London boroughs.
43. As already set out above we support the Mayor's desire to see TfL given greater influence over National Rail services in London and believe that particular emphasis should be placed on integrating the rail network into the rest of London's transport system. We are also pleased to see that the Mayor is seeking to have greater influence in franchise specification in order to improve capacity, service levels and integration of National Rail Services with TfL Services and to create a common set of travel products.

#### **Requirements for boroughs**

44. We welcome the Mayor's intention as set out in policy 29 to ensure that the requirements for Local Implementation Plans (LIPs) demonstrate consistency with the policies and proposals set out in the MTS and that other legal requirements are kept to a minimum. However we are concerned about how this will be delivered in practice given the prescriptive nature of the draft LIPs guidance produced by TfL.
45. We are also concerned that the MTS has introduced new requirements for boroughs (e.g. electric vehicle charging points, road works permit system, Community Safety Partnerships, planting trees etc), yet additional funding has not been provided to support the implementation of these proposals. Where relevant, e.g. for street trees, funding will also be required to cover the cost of ongoing maintenance not just the initial installation.
46. In conclusion, London Councils looks forward to working with TfL and the GLA over the coming months to ensure that the issues we have raised here are addressed in the revised Mayor's Transport Strategy. If you would like further information about any aspect of this response, please contact Ruth Bradshaw, Head of Infrastructure Policy (tel: 020 7934 9909; email: ruth.bradshxx@xxxxxxxxxxxxxxxx.xxx.xx).