

Appendix A

Consultation Questions

The Mayor is seeking views on his vision for London's transport system and on the range of proposals set out in the draft strategy. For each of the six broad policy areas the Mayor has asked for views on the measures and proposals and the top priorities together with suggestions for other measures that should be included in the strategy. A suggested response to these questions is contained below.

1. Managing and Enhancing the Transport System (Proposal 1 to 49)

The City's main priorities for enhancing the transport system are for the completion of the major rail projects such as Crossrail, Thameslink and East London Line with the completion of the upgrade of the Underground network and continued maintenance and investment in the infrastructure. In terms of future programmes of work, the City would support the reinstatement of the Cross River Tram into the TfL business plan post 2017.

<u>No.</u>	<u>Proposal</u>	<u>Comment</u>
4	The Mayor and TfL support the development of a national high-speed rail network and will work with the DfT, Network Rail, High Speed Two and other transport stakeholders to ensure that the London terminal for any new high-speed line is centrally located, well-connected to the existing public transport network, and widely accessible in order to maximise access to jobs and London's population. It is currently considered that Euston best meets these criteria and further evaluation will be made of this and other locations.	The City is supportive of the development of a national high speed rail network, and believes it could bring many benefits. There are many issues to consider, including the London terminus as highlighted in the proposal, but other issues, such as route alignment, connections to Heathrow etc are also important factors, and should be mentioned in the proposal in order to make it comprehensive.
5	The Mayor, through TfL, and working with the DfT, Network Rail, train operating companies, freight operating companies, boroughs and other transport stakeholders will seek to ensure	The City is a strong supporter of Crossrail and it is a high priority to see it delivered by 2017 with minimal impacts on residents and businesses during construction. The City would be keen to see future

	that Crossrail is delivered by 2017, and that it is fully integrated with the rest of London's public transport system; that the impacts of construction on residents and businesses are minimised so far as possible; and that the future benefits Crossrail brings are monitored to ensure the rail link achieves its objectives.	extensions of Crossrail aiding commuter routes, and making full use of the new central London infrastructure
6	The Mayor, through TfL, and working with the DfT, Network Rail, train operating companies and other stakeholders, will consider future extensions of Crossrail that reduce congestion and improve connectivity on London commuter routes.	
7	The Mayor, through TfL, will seek to ensure that Network Rail and the train operating companies deliver the committed improvements to the rail network and services in London as set out by the DfT's High Level Output Specification for the period 2009-2014.	It is important to the City that the planned improvements to the rail network and services in London are delivered within the HLOS period to 2014. These schemes, such as the increase in rolling stock and the completion of the East London line, will ensure reliability and increase capacity during the period leading up to the completion of the major Thameslink and Crossrail schemes.
8	The Mayor, through TfL, and working with the DfT, Network Rail, train operating companies, boroughs and other transport stakeholders, will seek further rail capacity across London's rail network, beyond those schemes already committed. The highest priorities are to further increase capacity on London Overground, southwest routes, the West Anglia Main Line and at congested stations.	Crowding and congestion on certain rail corridors, in particular in to Liverpool Street, show no signs of improvement despite the HLOS and TfL investment plan. Figure 32 of the document (page 119) shows that the rail corridors in 2017 and 2031 show little if any sign of improvement. Some rail corridors, such as those through London Bridge and into Fenchurch Street show signs of relief at 2017, but are back to being severely stressed by 2031. The outlook is bleak unless significant investment is found for the new spending plan post 2017. The City will support TfL and Network Rail in lobbying for adequate funding for capacity enhancements including such schemes as the 'eight tracking' of the approach into Liverpool Street Station.
9	The Mayor supports new rail capacity in the broad southwest to northeast corridor, for example, new lines or services using the Chelsea Hackney line safeguarded alignment. TfL will	The City is supportive of the proposal to build the Chelsea Hackney line, and therefore the review of the safeguarding of the route. However, with no funding available and the long timescales involved

	undertake a review of the route to ensure it is providing the maximum benefits and value for money.	the City does not see this as a high priority at present.
11	<p>The Mayor, through TfL, and working with the DfT, Network Rail, train operating companies and boroughs, will seek to deliver capacity enhancements at some of London's most congested stations. The highest priorities include:</p> <p>a) Central London termini station congestion relief and onward distribution enhancements (the potential of all onward modes will be considered)</p> <p>b) Clapham Junction station capacity enhancement (new improved links between platforms, additional entrances and more ticketing facilities)</p> <p>c) Improved capacity at National Rail stations with severe congestion, including Finsbury Park, Bromley South, Wimbledon, Vauxhall and Barking</p> <p>d) Improved capacity at National Rail stations with moderate congestion, including Willesden Junction, Balham, West Croydon, Norwood Junction and Surbiton</p>	<p>The City, is supportive of this proposal, and believes that Liverpool Street Station should be included in the Central London termini programme. Cannon Street, London Bridge, Blackfriars and Farringdon Stations are all being improved by Thameslink, Crossrail or development of the site above the station. There are no major plans for such improvements to the existing rail station at Liverpool Street, even with Crossrail.</p>
14	<p>The Mayor, through TfL and working with DfT and Network Rail, will investigate the feasibility of providing extra capacity to assist orbital movement on the Overground network and will review potential benefits of extensions to the network of services.</p>	<p>The City supports orbital movement, but is not directly served by the "Overground" network. Orbital links reduce the need for some passengers to have to enter central London first in order to travel to their destination. This will allow for some reduced congestion on some lines, but it is unclear as to the numbers of people that would be taken off of the radial network. Whilst the City is supportive, this is a much lower priority for us than completion of the Tube upgrades.</p>
15	<p>The Mayor, through TfL, will investigate the feasibility of</p>	<p>The City has been working with the DLR for some time on the</p>

	<p>further capacity and network expansion of the DLR including an extension to Dagenham Dock, as part of the housing proposals for Barking Riverside, and further network extensions, including options south of Lewisham, west of Bank and north of Stratford International.</p>	<p>feasibility of a westward extension from Bank towards Charing Cross and Victoria. The City is supportive of the concept and will support TfL in lobbying for funding to progress this opportunity to provide valuable new links and interchange opportunities whilst helping to distribute passengers away from the existing Bank terminus.</p>
17	<p>The Mayor, through TfL, will seek to deliver upgrades to all Tube lines in a phased programme to provide a significant increase in network capacity. This will involve a combination of new rolling stock and/or signalling systems and other asset replacement. As part of this, continued investment to bring the network to a good state of repair and maintain it at that level will be supported.</p>	<p>These two proposals are intrinsically linked and very important to the City. It is vital that the Tube enhancement programme is completed and that once complete is kept in a good state of repair. Many commuters are faced with overcrowding on their journey to and from work; the least that can be offered is a reliable service which is regularly maintained to reduce the risk of failures. Reliability will be an increasingly important factor as patronage continues to increase, and more of the network will be running at its optimum without buffer zones for failures.</p>
18	<p>The Mayor, through TfL, will continue to deliver an ongoing programme of Tube station refurbishments and asset stabilisation to ensure stations are operable and deliver customer service requirements, as well as continuing to improve station accessibility over the life of the strategy.</p>	
19	<p>The Mayor, through TfL, and working with the London boroughs and other transport stakeholders, will develop and implement a prioritised programme to deliver station capacity and accessibility enhancements at London's most congested Underground stations, including:</p> <p>a) Congestion relief schemes to complement Tube line upgrades and/or integrate with Crossrail at the key central London interchanges of Victoria, Tottenham Court Road, Bond Street, Paddington (Hammersmith & City) and at Bank</p>	<p>The City is keen for the development of station capacity and enhancement programmes at congested stations. The City has been working closely with London Underground regarding a long term congestion relief programme for Bank station and in securing a new entrance to the Waterloo and City Line. The City supports TfL in its quest to raise funding for the Bank Station masterplan, and will continue to facilitate where possible.</p> <p>Moorgate station is in need of improvement as it is an 'overflow' station for Bank station on the Northern line and suffers from overcrowding. Completion of the Northern line capacity</p>

	<p>b) Schemes at further strategic Tube interchanges that are critical to London’s transport system (e.g. Vauxhall, Finsbury Park, Highbury & Islington, Holborn, Camden Town, Oxford Circus, Edgware Road and Northern line City branch, in particular Old Street and Moorgate)</p> <p>c) Major strategic multi-modal/National Rail interchanges on to the Underground network to disperse onward demand arising from National Rail proposals (HLOS2 and HS2 proposals), e.g. London Bridge, Euston, Liverpool Street, Paddington, Elephant & Castle and Waterloo.</p>	<p>enhancement will put more pressure on Bank and Moorgate and the completion of Crossrail is also likely to put more pressure on the demand for north/south interchange at Moorgate. The City would like to see some timescales as to when the programme of works will be developed so that it gives a clear indication of intent.</p>
<p>20</p>	<p>The Mayor, through TfL, will implement the following measures in order to cool the Underground:</p> <p>a) New air-conditioned rolling stock across the sub-surface (Metropolitan, Circle, Hammersmith & City and District) lines, introduced progressively from 2010</p> <p>b) Improved ventilation shafts and replacements of out of service fans</p>	<p>Over 90% of the City’s working population commute by public transport. Climate scientists predict that climate change will make prolonged heat waves a regular event that could happen every other year by the 2030s. The Sub Surface lines will benefit from air-conditioning, but the strategy does not explain what is going to happen with the deeper tube lines such as the Northern and Central Line which are major transport arteries for City accessibility. The City appreciates the difficulty in identifying how the deep lines and stations will be cooled, but it is important that a strategy for this is established soon and that comprehensive contingency plans are put in place in the interim.</p>
<p>22</p>	<p>The Mayor, through TfL, and working with the DfT, Network Rail, train operating companies, boroughs and other stakeholders will seek longer-term enhancements and extensions to the Underground network, including:</p> <p>a) A further upgrade of the Northern line (Northern line Upgrade 2) to significantly increase train capacity through the City</p> <p>b) A privately funded extension of the Northern line to Battersea to support regeneration of the Battersea/Nine Elms area</p>	<p>The prediction, that despite the Northern line upgrades and other transport investment, there will be severe pressure on north-south routes, through the City by 2031, resulting in congestion levels very similar to that experienced today, is a disappointing outlook. The City welcomes the Northern line upgrade 2, but there are concerns regarding the overcrowding of stations, particularly at London Bridge, Bank and Moorgate; station congestion relief needs need to be considered for these stations as well as Camden Town. The recasting of the train pattern on the Northern line may create a further 20%</p>

	<p>c) A potential southern extension to the Bakerloo line will be reviewed further to utilise spare line capacity, improve connectivity and journey times, while providing relief to congested National Rail approaches to central London from the south/southeast, subject to resources and the results of further study</p> <p>d) A link at Croxley to join the Watford branch of the Metropolitan line to Watford Junction (funding to be secured by Hertfordshire County Council in conjunction with the DfT).</p>	<p>capacity by 2020, but the station platforms, escalators and exits need to be able to cope with the assumed increase in patronage.</p> <p>The City is not convinced that the proposed possible extension to Battersea to aid the development at Vauxhall/Nine Elms/Battersea Opportunity area will be beneficial to the existing Northern line and its passengers. The City would stress that the degradation of existing services on the Northern line would not be welcome. Within the draft London Plan (Policy 6.5), the Mayor identifies the extension of the Northern Line as a scheme which could be part funded through developer contributions in the same way as funding is currently being sought for Crossrail. The City believes that Crossrail should remain the Mayor's priority and that the potential funding for any Northern Line extension should not compromise the funding of Crossrail.</p> <p>A southern extension to the Bakerloo line, whilst providing new connections for an area with deprived transport links, would not be an adequate substitute for the Cross River Tram. The business case for the Cross River Tram is still very relevant and should be considered for funding in the next business planning round.</p>
23	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders will keep the development of the bus network under regular review to cater for growth in population and employment, maintain ease of use, attractive frequencies and adequate capacity, reliable services, good coverage and good interchange with other modes. All proposals for change will be appraised to ensure that they deliver good value for money and that the funds available are being invested in optimum service improvements.</p>	<p>Keeping the bus services under review is not sufficient. A full 'grass routes' approach needs to be undertaken, particularly in central London to assess whether the existing routes are the right ones. A comprehensive review may well find savings that can be used to reduce the existing subsidy. The City suffers from daytime congestion, often bus movements with few passengers, which leads to congestion and poor air quality. Particular corridors such as Ludgate Hill and Bishopsgate can appear 'over-bussed', and is commented on by our stakeholders. The City would urge the inclusion of a comprehensive review of bus routes and services in London in this proposal.</p>

<p>26</p>	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders will support improvements to the taxi service through a number of measures, including:</p> <ul style="list-style-type: none"> a) Continued highway priority for taxi services, for example, access to bus lanes b) Reduce taxi vehicle emissions and develop low emission taxis c) Provision of parking and waiting facilities, including rest facilities d) The provision of ranks and facilities at interchanges e) Taxi marshalling f) Action against touting and illegal cabs g) Improved driving behaviour, to be encouraged through the licensing procedure of taxi drivers h) Ensuring regulated taxi fares changes allow drivers and owners to continue to recover the costs of providing the taxi service and provide a sufficient incentive for taxi provision to meet demand, in particular at night i) Continuous process improvements to provide a modern and cost effective licensing service 	<p>Allowing taxis to use bus lanes can work in some instances, but due to the City's traffic composition, in most cases it would be detrimental to the bus services. Access for taxis needs to be undertaken on a case by case basis.</p> <p>The City believes that this strategy should clarify a plan for reducing taxi emissions. Taxis make up around 40% of traffic in some parts of the City and have an impact on the air quality. A clear structured plan of how taxis are to reduce their emissions and how this will aid the air quality targets would be beneficial.</p> <p>The City has noted in its response to the Air Quality Strategy, that taxis are one of the largest contributors to local emissions of both NO_x and PM₁₀ in the City and we would welcome further controls on their emissions where possible. A requirement for all new taxis entering the fleet from 2012 to be Euro 4 seems rather under-ambitious. It appears that significant emission reduction gains could be made if this was changed to Euro 5 and as a consequence, the City would like the Mayor to consider this.</p> <p>The City is supportive of Taxi Marshalling in the Square Mile, and taking action against touting and illegal cabs (including PHV's).</p>
<p>29</p>	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders will encourage and support the community transport sector's contribution to the development and provision of transport services in London.</p>	<p>The Air Quality Strategy proposes a 15 year age limit for taxis from 2012. Given the amount that the taxi fleet contributes to local concentrations of PM₁₀ and NO₂, the City would like this to be tightened</p>

		to 10 years from 2012.
30	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders will introduce measures to smooth traffic flows to manage congestion and improve journey time reliability for all people and freight movements, and maximise the efficiency of the road system from a business and individual perspective by, for example:</p> <ul style="list-style-type: none"> a) Investment in intelligent traffic control systems and the infrastructure to support it b) Allowing motorcycles and scooters to use TLRN bus lanes for a trial period and evaluating its impact c) Upgrading, optimisation and rationalisation of equipment at signal controlled junctions d) Working with the DfT to pilot and develop the concept of pedestrian countdown at traffic signals to optimise the amount of ‘green time’ for both pedestrians and road traffic e) Implementing a targeted programme of road network improvements, potentially including junction upgrades, to improve traffic flow on the most congested sections and to improve conditions for all road users f) Working with utility companies to reduce the impact of their street works on traffic congestion 	<p>Smoothing of traffic flow is welcomed in principle as it will benefit those elements of the business City that rely on smooth road traffic for reliable travel and deliveries and should also benefit air quality. However, care should be taken to ensure that any potential for increasing delays for pedestrians and cyclists particularly at signalled crossings is mitigated. This could generate a tension as other policies in the document which are encouraging a ‘cycling revolution’ and ‘making walking count’ aim to increase the numbers within these modes. In conclusion the City is supportive of improving traffic flow because of its business and air quality benefits providing there remains a fair balance between vehicle-based business needs and the safety of pedestrians and cyclists.</p> <p>More detailed information is necessary before the City can fully understand the implications of this proposal.. We have concerns that in certain areas of the City, if green times for pedestrians are reduced this may cause overcrowding of the footway, but the suggestion of a pedestrian countdown may be beneficial in such areas. The City would welcome discussions about how this proposal will be implemented.</p> <p>Figure 26 in the document shows the anticipated highway congestion for 2031. After completion of planned improvements, the figure suggests that most of the City will be experiencing greater than 2 minutes of average vehicle delay per vehicle km. This is not a prospect the City wishes to see as this will significantly affect City businesses and our local environment. It is not just the flow of traffic that needs to be tackled but significant reduction in the number of vehicles being used. This can only be achieved by measures such as road user charging and enforced service and delivery plans which use consolidation centres, as proposed in the document.</p>

31	<p>The Mayor, through TfL, and working with the London boroughs and utility companies will seek to minimise the impact of planned interventions on the road network on the movement of people and goods by:</p> <p>a) Utilising ‘LondonWorks’ to provide a way of improving street works planning and coordination</p> <p>b) Developing a new roadworks permit system</p> <p>c) Developing the concept of ‘lane rental’ charges for utilities to reflect the value of their temporary possession of road capacity (in terms of cost of delay to the road user)</p>	<p>The City is fully supportive of co-operative working to minimise disruption and already feeds into TfL's LondonWorks system, and is a part of the new permit system which will start on 11 Jan 2010.</p> <p>'lane rental' is an interesting concept which may bring large benefits to minimising disruption to the road network, and the City would be happy to work with the Mayor to investigate this. However, it would also be sensible to assess the impact of the new permit system before developing a detailed concept of ‘lane rental’.</p>
32	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will improve the realtime management of unplanned interventions and incidents on the road network, and improve communications to minimise the disruption and improve public satisfaction with road network management.</p>	<p>The City is fully supportive of this proposal and we already work with the London Traffic Control Centre to deal with incidents. Any improvements to this facility and process would be welcomed.</p>
33	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will utilise advances in ITS technology to better manage the road network, improve realtime traffic management capability and lay the foundations for communication with in-vehicle systems, with the aim of developing a state-of-the art traffic signal control system for the 21st century.</p>	<p>The City would welcome any improvements to traffic control systems in the City.</p>
34	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders will take a criteria-based approach to road schemes which would allow them to go ahead if there is an overall net benefit, taking into account the</p>	<p>The concept of a criteria based approach to road schemes is welcomed in the main. However, in Central London in particular, local authorities have had difficulties in the past with getting TfL to approve schemes that affected the Strategic Road Network due to the Network Management</p>

	<p>following factors:</p> <p>a) The contribution to London's development/regeneration</p> <p>b) The extent to which congestion is reduced</p> <p>c) How net benefit to London's environment can be provided</p> <p>d) How conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved</p> <p>e) How safety for all is improved</p>	<p>Duty. How will this criteria based approach work in parallel, and will TfL still be responsible for making these final decisions? Such a lot of money has been spent assessing schemes in great detail and using expensive modelling procedures, for TfL to delay making a decision and asking for yet further information. The process by which these schemes are approved also needs to be revised, not just the criteria.</p>
36	<p>The Mayor, through TfL, and working with the Port of London Authority, the ODA, boat operators, pier owners, riparian boroughs and other interested parties will continue the River Services Concordat to work together to enable the development of London's river services to reach their full potential and to better integrate river services into the overall transport network.</p>	<p>The City is a member of the River Concordat and continues to support the development of river services and infrastructure</p>
37	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will encourage the provision of more pier capacity, particularly in central London and will seek financial support for new piers when considering development proposals in the vicinity of the Thames. The Mayor, through TfL, will also work with the Port of London Authority, boroughs and operators to identify and promote suitable boat yard facilities in London.</p>	
47	<p>The Mayor recognises that adequate airport runway capacity is critical to the competitive position of London in a global economy, but opposes any further increases in capacity at Heathrow.</p>	<p>The City has previously stated that it does not think that Heathrow should be ignored as a possibility for future expansion, until all other options have been assessed. We are supportive of the continued investigations for additional capacity in the south east to ensure the competitive position of</p>

	London.
--	---------

2. Encouraging more cycling and walking

The City is supportive of encouraging more sustainable modes of transport such as cycling and walking, and has been working with TfL to accommodate the Cycle Hire Scheme. Whilst increasing the numbers of people cycling and walking will have many benefits, the City is often reminded by stakeholders of the conflict, particularly between these two modes. There is a need to ensure safer cycling practices and so education is an important part of making these proposals work as well as providing the right information and infrastructure. Cycle parking forms an integral part of the Mayor's "cycling revolution" and this is reflected in numerous parts of the strategy. The City has almost exhausted its on street cycle parking opportunities and is now looking at the possibilities for providing alternative off street provision.

<u>No.</u>	<u>Proposal</u>	<u>Comment</u>
53	<p>The Mayor, through TfL, and working with the boroughs and other stakeholders, will deliver improvements to cycling infrastructure and training to support the cycling revolution, including:</p> <p>a) The London Cycle Hire Scheme in 2010 in central London</p> <p>b) Twelve Cycle Superhighways will be developed for commuters and others to cycle to central London, improving the capacity of the radial network</p> <p>c) Enhanced cycle links to the Olympic Park by 2012 and the development of a wider network of Greenways across London</p> <p>d) Cycle hire schemes and cycle superhighways introduced elsewhere, particularly in Outer London, if the initial schemes are</p>	<p>e) A preliminary, informal survey among businesses in the City has suggested that about 10,000 commuters would take up cycling as their mode of transport if adequate parking facilities were available. The City is developing plans to address this issue locally, but the bicycles need to be stored at the origin of the journey and other stops of multi-leg journeys as well. The Strategy, in connection with the London Plan, should ensure that all new residential developments provide adequate cycle storage opportunities. Also, the Strategy needs to emphasize that cycle parking at key destinations needs to be placed strategically (e.g. near the edges of pedestrian zones, close to supermarkets, shopping centres and leisure facilities) and be adequately signposted.</p>

	<p>successful and there is sufficient demand</p> <p>e) Increased provision of secure bicycle parking facilities, particularly at stations, workplaces, schools, retail and leisure sites</p> <p>f) Improving the permeability of the road network for cycling</p> <p>g) Delivering road enhancements to make cycling easier and safer, including managing car access to residential areas, through physical or design measures, to create pleasant and safer cycling environments</p> <p>h) Offering cycle training for people of all ages</p>	
55	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will press for specific primary legislation to establish an effective legal framework for pedicabs, including specific licensing powers for the boroughs.</p>	<p>The City supports the proposed licensing of pedicabs.</p>
59	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will improve the walking experience by enhancing the urban realm and taking focused action to ensure safe, comfortable and attractive walking conditions, including:</p> <p>a) Development of the Key Walking Route approach</p> <p>b) Providing direct, convenient pedestrian access (for example, with surface crossings) where appropriate</p> <p>c) Street audits to identify pedestrian needs and guidance (such as pedestrian comfort levels)</p> <p>d) Completing the seven Strategic Walking Network routes</p>	<p>The City has been improving its street environment for several years to make the City a more pleasant place to walk, however there is still much work that needs to be done, particularly in managing the conflict between pedestrians, cyclists and vehicles and finding the right balance across the City. Education and other proactive measures to ensure safer cycling will also make the street environment a safer more pleasant place for pedestrians. The City is supportive of the approach to improve the pedestrian experience, and in trying to encourage people to walk more as part of their daily routine to improve their health.</p>

	<p>e) Training for those involved in the design and delivery of walking schemes</p> <p>f) Enhancing pavement space for pedestrians and removing guardrails and other obstacles</p> <p>g) Seeking to manage car access to residential areas, through physical or design measures, to create pleasant and safer walking environments</p> <p>h) Tackling the fear of crime and feeling unsafe on the streets</p> <p>i) Supporting major projects such as high street revitalisation through good quality urban realm designed to support regeneration of small businesses and encourage local shopping and activity</p> <p>j) Improving access and safety between the station and surrounding areas for pedestrians (and cyclists) to encourage active and smarter travel</p> <p>k) Encouraging the extension of a network of linked green spaces (ie a green grid approach) throughout London</p>	
60	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will improve the quality and provision of information and resources for walking, especially at stations, interchanges and in town centres, by:</p> <p>a) Creating an online one-stop walking resource to facilitate walking, linked to an enhanced Journey Planner with advanced walking options</p>	<p>The City is supportive of improved information to aid the take up of walking</p>

	b) Developing consistent wayfinding formats and making use of new wayfinding technologies	
	c) Roll out of Legible London to other areas	

3. Improving Safety and Security (proposals 62 to 81)

The City takes safety and security of its communities very seriously and generally supports the direction of the MTS proposals. The City believes that the policies encouraging an increase in cycling and walking activity need to be accompanied by a pro-active approach to road safety. Education and design will be crucial tools to minimise conflicts of interest on busy streets and pavements. The City of London Police are working with TfL, the British Transport Police and the Metropolitan Police forces to provide a coordinated and consistent approach for the travelling public.

<u>No.</u>	<u>Proposal</u>	<u>Comment</u>
62	The Mayor, through TfL, and working with the London boroughs, Network Rail, train operating companies and other stakeholders, will seek to reduce accidental fatality and injury rates on London's transport system further; and will aim to reduce London Bus road user fatality, major and minor injury rates.	Bus driver training needs to be improved and more emphasis on cyclist awareness included.
63	The Mayor, through TfL, and working with the London boroughs, Highways Agency, road safety partnerships and other stakeholders, will seek to achieve any new national road safety targets and such further road safety targets as the Mayor may set from time to time.	The proposed new national casualty targets are not appropriate for London. The Mayor, through TfL, should seek to reduce casualties further and set higher targets.
64	The Mayor, through TfL, and working with the Highways Agency, boroughs, road safety partnerships and other stakeholders, will develop a new Road Safety Plan to reflect any new road safety targets to be set by the Government or the Mayor	We welcome the opportunity for further consultation on the new Road Safety Plan.

	and review progress every five years.	
66	The Mayor, through TfL, and working with the London boroughs, the DfT and other stakeholders, will undertake public information and engagement to improve road user behaviours and reduce the risk of collisions	Liaison with borough Road Safety Officers needs to be improved, the infrequent Pan London meetings are not sufficient, with increased consultation on new proposed road safety education and publicity initiatives.
67	The Mayor, through TfL, and working with the DfT, boroughs, road freight operators and other stakeholders, will improve safety for cyclists in the vicinity of HGVs, by: a) Encouraging the Government to amend legislation and remove the current exemption for HGVs being fitted with sideguard protection b) Working to increase the number of HGVs with sideguards or fitted with electronic warning devices that detect cyclists	Agreed - with additional increased provision of cycle training and cyclist awareness campaigns.

4. Improving London's Environment (proposals 82 to 94)

The City is a strong supporter of improving London's environment and supports the proposals below. It is felt however that these proposals could be improved further by being more specific in some cases and clearly linking with the Air Quality Strategy so that targets can be achieved in tandem.

<u>No.</u>	<u>Proposal</u>	<u>Comment</u>
85	The Mayor, through TfL, and working with the London boroughs and other stakeholders, will target the provision of noise reduction measures and noise mitigation measures in areas significantly affected by transport noise, to improve perceptions of noise and reduce the impacts of noise by:	The City supports the proposals for mitigating transport related noise, in particular quieter buses and replacing road surfaces with low noise surfacing where possible. However, the strategy is lacking in timescales for the introduction of quieter technology. It would benefit from specific measurable targets and referencing the priority areas for

	<ul style="list-style-type: none"> a) Timely and effective rail maintenance and replacement works b) Working to the TfL Health Safety and Environment policy c) Ensuring all new transport projects consider noise mitigation d) Introducing road maintenance programmes to replace road surfaces with low-noise surfacing where possible e) Improving traffic management and signal control techniques f) Introducing speed enforcement measures which do not encourage noisy, rapid acceleration and deceleration g) Introducing quieter buses h) Procuring new quieter public sector service vehicles, potentially through joint procurement to achieve efficiency 	<p>deploying quieter buses and road surfacing.</p> <p>The proposals for noise mitigation would also benefit from being assessed and undertaken alongside the air quality management targets so that the two policies can be addressed in tandem.</p>
86	<p>The Mayor, through TfL, and working with the London councils, London boroughs, freight industry, and other stakeholders, will explore opportunities to use the London Lorry Control Scheme to encourage companies to operate quieter vehicles as well to promote improvements in air quality and reduce CO2 emissions.</p>	<p>The City supports the investigation into opportunities to use the London Lorry Control Scheme to encourage companies to operate quieter vehicles and the encouragement of quieter driving.</p>
88	<p>The Mayor, through TfL, and working with DfT, the national air traffic control service, and the European Commission will:</p> <ul style="list-style-type: none"> a) Encourage the development and use of quieter aircraft b) Seek to coordinate flight paths so they minimise their impact on London 	<p>The City would welcome the coordination of aircraft flight paths so they minimise their impact on London and the development of quieter aircraft.</p>

89	<p>The Mayor, through TfL, and working with the DfT, Highways Agency, London boroughs, Network Rail, and other stakeholders, will work to make the most of open spaces across the transport system (eg green spaces alongside roads, rivers, cycle Greenways, strategic walking routes, green grids, roof tops, and railway lines) to improve the quality and diversity of London’s natural environment.</p>	<p>Improving the quality and diversity of London's natural environment is welcome, although this proposal is a little vague as to the detail of what is hoped to be achieved. This proposal could benefit from being more specific. There does not appear to be any funding identified for potential projects related to biodiversity. Funding streams should try to be identified. This proposal should also be specifically linked to draft London Plan Policy 2.18 which seeks to apply Green grid principles across London.</p>
90	<p>The Mayor, through TfL, and working with London boroughs, transport operators and other stakeholders, will promote behavioural changes to reduce vehicle emissions by:</p> <ul style="list-style-type: none"> a) Promoting walking and cycling, the use of car clubs, car sharing, the use of fuel-efficient vehicles and smarter driving techniques and raising awareness about air quality b) Implementing eco-driving training for all GLA/functional body and bus drivers c) The Mayor will also reduce emissions from the wider fleet by supporting eco-driving training for members of the public, freight drivers (through the existing FORS scheme) and tackling emissions caused by unnecessary idling d) Providing better information about emissions from the public transport fleet 	<p>The City welcomes the implementation of ‘ecodriver’ training for drivers of vehicles within the Mayor’s authority, and the potential for rolling this out to members of the public. The City is considering introducing a similar scheme for its employees, both drivers and desk bound staff.</p>
91	<p>The Mayor, through TfL, and working with the London boroughs, DfT, Network Rail, train operating companies, and other stakeholders, will introduce measures to reduce emissions, including:</p> <ul style="list-style-type: none"> a) Cleaner buses which pollute the air less 	<p>Whilst the City supports the proposal to reduce emissions from the public transport fleet, no specific targets or measures have been set. For example, buses and taxis contribute to a significant amount of local air pollution in the City and need to be tackled, this strategy agrees with that, but doesn’t take us any further forward on how or when this will be</p>

	<p>b) Cleaner taxis, PHVs</p> <p>c) Further rail electrification, including the recently announced Great Western line electrification scheme, and the Barking to Gospel Oak line</p> <p>d) Cleaner passenger boats and other river vessels, which use more environmentally friendly fuels</p> <p>e) Encourage the introduction of cleaner public service and local authority vehicles</p>	<p>achieved.</p> <p>The reduction of NOx (52% by 2015) and PM10 (25% by 2015) detailed in figure 56 and 57 is ambitious, and the measures detailed in this strategy are unlikely to achieve these reductions.</p> <p>The City would be pleased to see proposals for public sector bodies to have minimum emission standards in their respective fleets. As the City has adopted NI194 into its Local Area Agreement, we have made a commitment to reduce our own emissions both from our fleet and buildings over the next two years.</p> <p>The City believes that the MTS should include an explicit cross reference to the policies in the London Plan and the provisions of the Mayor's Air Quality Strategy.</p>
92	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will take further action to reduce private vehicle emissions by:</p> <p>a) Supporting the uptake of low emission vehicles, such as electric cars and vans</p> <p>b) Incentivisation of low emission vehicles through pressing for changes to vehicle excise duty and parking regulations</p> <p>c) Working with the European Commission, the Government and vehicle manufacturers, the Mayor will seek new technologies which help vehicles be cleaner, such as better tyres which wear less, more sophisticated abatement technology and automatic hybrid-switching</p>	<p>The City can see the benefit of having electric car fleets in terms of minimising local air pollution from emissions. However, the City has concerns that encouraging the take up of electric vehicles for private use may encourage a shift of people that are currently travelling by public transport into electric vehicles (particularly if they are provided with reduced parking charges, and other exemptions). This will have a negative impact on congestion. The City has already had to reverse its policy of providing free parking for electric vehicles due to a massive rise in the numbers of electric vehicle owners applying for free parking permits following the introduction of the congestion charge. The City is keen to ensure that there is no modal shift away from public transport towards private vehicles.</p>
93	<p>The Mayor, through TfL, and working with the London boroughs and other stakeholders, will introduce targeted local measures at air quality hotspots to reduce emissions and improve local air</p>	<p>The City would be pleased to work with the Mayor, through TfL, to introduce targeted local measures at air quality hot spots to improve air quality. However, in light of the very tight timescale in which to develop and implement effective measures to achieve the PM10 Limit value by</p>

	<p>quality.</p>	<p>2011, the City of London would like to register its concern over the apparent lack of proposals at very this late stage. Again there should be an explicit reference to the London Plan and Mayor's Air Quality Strategy.</p>
<p>94</p>	<p>The Mayor, through TfL, will continue to operate the existing London LEZ. The Mayor will consider further tightening of the standards of the current LEZ, as well as the introduction of further emissions control schemes to encourage the use of cleaner vehicles in London:</p> <p>a) The current LEZ scheme will continue to operate to reduce emissions from the heaviest vehicles, and phase four will be introduced in 2012</p> <p>b) The Mayor will defer the implementation of phase three of the scheme covering LGVs and minibuses (which was due to commence in 2010) to 2012</p> <p>c) In 2015, the Mayor will, subject to technical feasibility, introduce an emissions standard for NOx (EuroIV) into the London LEZ for HGVs, buses and coaches (phase five)</p> <p>d) If necessary, the Mayor may consider introducing minimum requirements for other vehicles or tighter standards in particular locations within London</p> <p>e) The Mayor will work with boroughs that wish to take local action to address air quality through local low emission zones or similar measures</p>	<p>The strategy suggests that London Boroughs may wish to develop their own Low Emission Zones, in addition to the London Wide LEZ. This approach seems rather impractical and potentially very confusing. In order to be effective, a LEZ would need to cover a wide area . The City would like the strategy to explain why a Central / Inner London LEZ covering, for example the Congestion Charge Zone, or within the North / South circular was discounted.</p> <p>The City is pleased to see that the Mayor proposes to introduce a NOx standard for the LEZ in 2015. Mayoral support for a national certification and testing scheme for NOx retrofit equipment is also very welcome.</p> <p>It is unfortunate that the Mayor intends to defer Phase 3 of the London Low Emission Zone to 2012. The Mayor will be aware that the European Commission has rejected the UK's application for an extension for compliance with the PM10 objective to 2011. The application included proposals for Phase 3 of the LEZ to be implemented in 2010, which would have been in time for the 2011 deadline. The City is particularly concerned about the delayed implementation of Phase 3 of the LEZ, as certain roads within the City continue to exceed the PM10 objective, and will do so beyond 2011, unless a coordinated suite of measures are implemented to reduce emissions. The City is aware that some options to control PM10 are being considered by the Mayor and Transport for London, but nothing concrete has been forthcoming to date. Given the European</p>

		Commissions recent decision, this matter is now urgent.
--	--	---

5. **Reducing Transport’s contribution to climate change and improving its resilience (proposals 95 to 113)**

The City of London is committed to reducing its impact on climate change. Achieving the regional and national emissions reduction targets will require coordinated action on national, regional and local scale. The Mayor has an important role to play in coordinating such action across London, thus enabling concerted local action that contributes to regional targets. Generally the City is supportive of the proposals in this section.

<u>No.</u>	<u>Proposal</u>	<u>Comment</u>
99	The Mayor, through TfL, will introduce automatic train control (a tool that can optimise energy efficiency through driving style) across the Tube network. Drivers of non-automatic railways, such as London Overground, will be given training on energy efficient driving style, as will London’s bus drivers.	The City supports the introduction of automatic train control across the tube network which will generally make for a more reliable service and smoother journeys for passengers.
101	The Mayor, through TfL, and working with the London boroughs, Highways Agency, and other stakeholders, will implement a package of measures (including the rephasing and coordination of traffic signals) to reduce road traffic emissions by smoothing the flow of traffic and optimising the efficiency of London’s road network.	As per proposal 30
107	The Mayor, through TfL, and working with the London boroughs and other stakeholders, will promote CO2 standards for vehicles and infrastructure controlled, procured or regulated by the Mayor, GLA Group and/or other public sector bodies (eg public transport vehicles, taxis, street and station lighting and infrastructure embodied carbon) to reduce emissions from existing and new	Regarding item c) – The City has noted in its response to the Air Quality Strategy, that Taxis are one of the largest contributors to local emissions of both NOx and PM10 in the City and we would welcome further controls on their emissions where possible. A requirement for all new taxis entering the

	<p>vehicles and infrastructure, including the following specific measures:</p> <p>a) The Mayor, through his functional bodies, will have an increased electric-powered vehicle fleet by 2015</p> <p>b) All new buses entering fleets operated on behalf of the Mayor from 2011/12 will be lower carbon</p> <p>c) Completion of the Low Carbon Taxi Development Programme by 2012, working with vehicle manufacturers and the taxi trade to develop a new low carbon and low air pollutant version of the London taxi</p> <p>d) A three-year trial of at least five hydrogen-powered buses from 2010</p> <p>e) Trialling of low energy station lighting and automatic meter reading</p> <p>f) LED traffic signals preferred to conventional technology when replacing life-expired signal sets and trialling of LED street lighting</p> <p>g) Major infrastructure schemes will conduct a carbon footprint assessment</p>	<p>fleet from 2012 to be Euro 4 seems rather under-ambitious. It appears that significant emission reduction gains could be made if this was changed to Euro 5 and as a consequence, the City would like the Mayor to consider this whilst introducing a lower carbon taxi.</p>
112	<p>The Mayor, through TfL, and working with the London boroughs, Network Rail and other transport infrastructure owners, will plant an additional 10,000 trees on London's streets by 2012, with the ambition of an additional two million trees in London by 2025.</p>	<p>Trees are very important features of urban areas and provide unparalleled benefits relating to biodiversity, climate change and air quality. Given that there is very limited space available in the City, trees must be chosen and placed strategically to provide maximum benefit. The Open Spaces directorate is currently developing a City Tree Strategy. The Mayor's Strategy should make reference to specific</p>

		benefits to be considered in the choice of tree species to be planted, particularly biodiversity, climate change and air quality.
--	--	---

6. Managing the Demand for Travel (Proposals 114 to 129)

Proposals for managing demand are important, considering that the predictions are for continued growth of demand without sufficient capacity to improve travelling conditions for passengers in the long term. Provision of information is an important element of this, as is encouraging modal shifts to walking and cycling, however public transport fares are a critical part of attracting businesses to London and therefore large increases in fares would discourage future investment. The City, whilst supportive of the concept of managing demand, can see that it is also one of the more difficult areas to achieve a noticeable difference.

<u>No.</u>	<u>Proposal</u>	<u>Comment</u>
114	<p>The Mayor, through TfL, and working with the London boroughs, DfT, Network Rail, train operating companies, and other stakeholders, will enhance the provision of information to improve customers' knowledge and understanding on service availability, delays and other information to improve customer satisfaction and the way in which Londoners use public transport and make travel decisions by:</p> <p>a) Upgrading the TfL web-based Journey Planner, allowing further improvements to realtime performance, accuracy and personalisation</p> <p>b) Providing customers with a range of paper-based information (Tube, cycle and bus 'spider' maps, timetables, fares and service changes)</p> <p>c) Raising public awareness and knowledge of existing public transport provision, particularly, orbital public transport services</p>	<p>The City fully supports the improvements to the public information on journey planning and will aid this where possible. The City publicises its own public transport guide which is also available on-line.</p>

	<p>d) Further development of journey planning, including web-based information, for local trips to town centres</p> <p>e) Developing town centre journey planning tools</p>	
116	<p>The Mayor, through TfL, and working with the London boroughs, and other stakeholders in the public and private sectors, will improve the efficiency and effectiveness of freight operations through the promotion of ‘delivery and servicing plans’, ‘construction logistics plans’, the Freight Operator Recognition Scheme and other efficiency measures, across London.</p>	<p>The City is interested in how to improve the efficiency and effectiveness of freight operations and has been taking part in research with ‘London Remade’ regarding our own freight movements and would support measures to encourage private sector bodies in the City to consider their own impact of freight movements.</p>
119	<p>The Mayor will ensure that fares provide an appropriate and necessary level of financial contribution towards the cost of providing public transport services to ensure that public transport continues to play a central role in London’s transport system and overall economic development.</p>	<p>Whilst the City agree that public transport fares should be appropriate in order to contribute towards the cost of providing services, the City does not think that large increases in fares would be acceptable, particularly when the Strategy suggests that overcrowding will continue to be a problem despite further transport enhancements. If public transport fares are seen to be too expensive, this will impact on the attractiveness of investing in London.</p>