

# **The Draft Mayor's Transport Strategy (MTS 2)**

## **Response from LB Enfield**

### **1. BACKGROUND**

On 12 October 2009, the Mayor published a draft Transport Strategy for public consultation. The document was published alongside public consultation drafts of the revised London Plan and Mayor's Economic Development Strategy (EDS).

The draft MTS 2 has been developed from the Mayor's Direction of Travel document on transport ('Way to Go') published in November 2008 and the 'Statement of Intent' which was published for consultation with the Assembly and Functional Bodies in May 2009. Enfield submitted responses to both these consultations in December 2008<sup>1</sup> and July 2009<sup>2</sup>. The MTS public consultation draft sets out in more detail the policies and proposals put forward in the Statement of Intent. Subject to the outcome of the public consultation, the final MTS is expected to be published in spring 2010.

This review of the transport strategy is being undertaken in parallel with a full review of the London Plan and the Mayor's Economic Development Strategy; accordingly, similar documents for those two strategies are therefore being published and consulted upon in parallel with the draft MTS.

### **2. ENFIELD'S RESPONSE**

Enfield is in very substantial agreement with the overall perspectives of the proposed Transport Strategy as represented in terms of goals, challenges and outcomes within the structure described (Figure2, Page 36). They accord well with our own aims and aspirations.

#### **2.1 Areas of Support**

In particular, Enfield is pleased to note the explicit recognition of 6 key aspects.

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<sup>1</sup> Response to Way to Go! from LB Enfield, 3<sup>rd</sup> December 2008

<sup>2</sup> Response Statement of Intent, 7<sup>th</sup> July 2009

1. The recognition of the importance of Outer London and the need to develop the economy of Outer London and the concomitant need to develop transport infrastructure in order to enable such economic development . The move away from a focus on a few ‘strategic centres’ and to instead base future growth around existing town centres and to improve transport connectivity into and between those centres is also welcomed.
2. The recognition that a high proportion of the population is dependent on car based transport and that a well balanced approach to transport provision, instead of punitive bias against the motorist, is both realistic in terms of what is achievable and is long overdue.
3. Enfield positively welcomes the proposed initiative on the “London Street Works Permit” (Proposal 31, Page 152) aimed at minimising disruption caused by street works by the application of financial disincentives to occupy road space irrationally and without forward planning.
4. Enfield is particularly pleased with the proposals for improving accessibility for sensory and/or mobility impaired users (Pages 164 – 168), which again are both realistic and proportionate.
5. It is appropriate that the draft Strategy includes an Implementation Plan (Chapter 7, Page 275) which sets out clearly which schemes are funded and which are in development stages. It is also noted that the draft strategy contains greater detail on how funding will be sought and secured. We do however flag up the need for continuous planning of major schemes, since without such planning, at the end of the present funding cycle, there can be no further progress on such improvements.
6. Finally, it is entirely appropriate (Proposal 34 , Page 155) that the Mayor will apply a criteria based approach to road schemes enabling them to go ahead if there is an overall **net benefit** as defined . This is a most welcome change from the excessively restrictive approach of the previous Mayor’s strategy.

Enfield is particularly pleased to note the above and supports the broad perspective of the proposed MTS to induce and encourage the shift to public transport, cycling and walking without disproportionately penalising car drivers. It is however appropriate that several of Enfield's concerns are explicitly noted.

## **2.2 Areas of General Concern**

Eight areas of general concern are detailed in this section which relate to the whole of the proposed MTS as a London wide strategy as opposed to concerns which apply specifically to the Borough of Enfield which are dealt with in section 2.3 below.

### **1. Provision for Economic Growth.**

It is imperative that the draft MTS (and indeed the other two strategies) consider London's economic and employment growth under a realistic range of different rates of economic growth scenarios; this need assumes all the greater relevance in view of the continued uncertainty about the length and depth of the current recession. The strategies are essentially underpinned by one very positive projection of economic growth in London. A different level of growth would affect the implementation of all three strategies.

The detailed planned transport investment proposed in the Mayor's Transport Strategy (Chapter 7, Page 275) and the strategic Opportunity Areas and Growth Corridors within the London Plan need to be brought together to give a schedule of infrastructure projects that will direct LDA and other public investments. Whilst the draft London Plan, Transport Strategy and EDS each provide a partial picture of strategic developments across London, it is difficult to align these together.

It is vital that MTS2 takes the fullest account of the transport implications of economic growth and housing developments envisaged in changes to the London Plan. In our view, MTS2 must make clear provision for the required development of new transport infrastructure that is implied by and concomitant with the anticipated growth. Measures to extract more capacity from the existing network are by themselves very unlikely to be adequate. The alternative to this of course is that the London Plan aspirations or projected

growth will need to be curtailed. The significant growth in population envisaged for the North London Sub-region (Page 48) and the challenge in providing transport infrastructure concomitant with this growth amply illustrates this need. The need to proceed with very substantial capacity enhancements on West Anglia Rail corridor is highlighted by the recognition that even in 2017, Corridor 'L' (Pages 47 & 119) will otherwise remain designated as 'Severely Stressed'.

## **2. Orbital Transport**

Paragraph 139, Page 80 states "Because of the relatively low demand for orbital transport, particularly in Outer London.....". Insofar as it is relevant to North London this statement is misleading; the reality is that orbital routes are poor or non-existent in many sectors of North London. Car based trips account for over 80% of orbital movements of work trips and only 41% of radial movements of work trips. Rail and Underground account for 45% of radial trips to work and only 4% of orbital trips to work. That there are acute limitations in the availability of orbital transport can be clearly seen from Figure 39, Page 141. It needs to be stressed that the lack of orbital transport is a crucial factor in the development opportunities, including employment potential in areas such as North East Enfield, being frustrated by inadequate accessibility by both public and private transport. Clearly, for the area to realise its' full potential, there needs to be a fully integrated package of transport measures including the Northern Gateway Access Package (NGAP) which includes much needed improvements to accessing the M25 to relieve the heavily congested Bullsmoor Lane (A1055), a predominantly residential road never constructed to carry the present weight of traffic.

## **3. Buses**

A comprehensive review of the bus network, to meet the needs of Londoners and visitors to London in the 21<sup>st</sup> century, is required. TfL's oft-heralded bus success story is not uncontroversial. Further, this success has come at a very significant cost. The review must therefore include an audit of costs and benefits. Indeed, certain limited aspects were reviewed independently by

consultants KPMG<sup>3</sup>. The consultants' report published in July 2009 highlighted the massive growth in bus subsidy which had taken place under the previous Mayor; from £41 million p.a. at the start to £653 million p.a. in a span of just 8 years. This excessive level of subsidy would just be acceptable if it had been accompanied by a proportionate increase in passenger usage/revenue, but as KPMG shows, this is not the case which means that the taxpayer is simply not getting value for money. The KPMG report also identified 34 explicit recommendations and the MTS must set out a perspective on the implementation of these recommendations.

The provision of buses, bus priority, bus stops and bus stands must be based on audited bus usage figures<sup>4</sup> and must be kept under regular review with regard to value for money by the appropriate application of this concept. Both anecdotally and in reality, that there are far too many buses running empty for much of the time which indicates that the extra subsidy has not in practice given London the turn around in bus usage that was intended. A significant part of the subsidy has been consumed by the policy of the previous Mayor in extending free travel. We see no case for young people (i.e. over 12s) to receive this subsidy other than for school journeys.

#### **4. Parking Policy and Standards**

The trends in motoring costs, public transport costs, and demographic changes have given rise to very high levels of vehicle ownership (over 1400 cars per 1000 households in several wards in Enfield); these levels will continue to rise at least for the next few years. The provision of road space and parking are bound to become increasingly important determinants of transport policy in the period to which MTS2 applies. Clear policy guidelines, relating to parking and consistent standards across London are therefore needed in MTS2. Page 82 refers to giving priority parking to low emission/ electric vehicles. A clear policy on parking hierarchy, accommodating issues of disabled parking, low emission and other criteria needs to be established.

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<sup>3</sup> Independent strategic review of the provision of Bus Services in London, KPMG LLP Final Report, 16<sup>th</sup> July 2009

<sup>4</sup> Enfield's Local Implementation Plan – Addendum, January 2007, chapter 5, section 12.9.1

## 5. Door to Door Transport

There are a number of services in London that provide door to door transport for mobility-impaired people and those with special needs (Dial a Ride, Taxicard, Capital Call and borough specific services such as Special Educational Needs (SEN) and Adult Service Transport) – each with their own eligibility criteria, entitlements, budgets and administration. Several audit reports/reviews have identified that services are supply rather than demand led; there is a lack of clarity around what the services really are and who they are for; and there is a lack of co-ordination between services in London.

The boroughs are by far the largest funders of these services, spending over £200m per year, particularly on SEN and adult service statutory transport. TfL funds over £40m on Dial a Ride, Taxicard and Capital Call.

In order to provide a strategic overview, London Councils employed a consultancy firm, *eo consulting*<sup>5</sup>, to assist London Councils officers with the development of a strategy. The consultant was required to:

- Examine current door to door services and identify a clear policy on whether and how these services can achieve joint working or integration and improvements in efficiency, particularly with regard to procurement and service provision
- set out the options for a door to door strategy, identifying how strategic and local needs for these services can best be met
- Propose a method of Governance
- Propose an equitable funding methodology

The MTS proposals should be based on the recommendations of the EO report.

## 6. Road Safety

There exists a substantial body of published and unpublished research clearly indicating that untaxed and unroadworthy vehicles are disproportionately

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<sup>5</sup> A Future Door to Door Strategy for London, September 2009

involved in accidents and particularly in 'Hit & Run' accidents. The Strategy must make explicit proposals to deal with this problem. We favour policies which further expose the uninsured / untaxed vehicle, by excluding such vehicles from any controlled parking zones, i.e. permits should not be granted/validated if vehicles are either untaxed or uninsured. Enfield has adopted this policy in relation to its own CPZs. In addition, we strongly favour a return to effective traffic policing so that careless driving is properly dealt with before it becomes dangerous and not just as the result of an accident occurring. Speed cameras have in our view often only served to penalise many otherwise reasonable drivers, while the reckless, negligent and dangerous go unpunished often until sadly a fatality occurs.

## **7. Access to Health Care**

Although the Case Study (page 91) refers to improving access to health services, There is a strong case for 'Access to Health Care' to be explicitly recognized as a particular transport need with specific characteristics. This recognition can have decisive effect on transport provision, particularly bus service provision and route evaluation. The clear direction of impending developments in reorganization and rationalization of health care across London in the near future adds to need for this explicit recognition. London Travelwatch and the Barnet & Enfield Health Trust Transport Working Group have both recognized this need.

## **8. Cycling**

Enfield positively supports initiatives such as the cycle hire scheme and enhanced facilities.

We note that it is proposed to 'Develop twelve Cycle Superhighways for commuters and others to cycle to central London,' (Page 179) improving the capacity of the radial network. We have reservations as to whether this has been very clearly thought through. We recognise that for relatively short journeys, cycling is an option, but for commuting from Enfield and other outer London boroughs, we doubt the viability. **In terms of actual Person-Kilometres of travel, it must be recognized that cycling makes up less**

**than one half of one percent <sup>6</sup> of aggregate travel.** That is not to say that we should not try to increase the take up of cycling ; however, it does need to be recognized that many millions have already been spent on cycle routes with very little enumerated increase in take up. If these Superhighways are from existing capacity, it follows that there may be serious implications for other traffic. If they are part of new infrastructure, then the costs and benefits need to be very carefully assessed. Enfield's view is that more emphasis should be placed on leisure cycling and on local cycle trips on routes which do not detrimentally affect capacity of the existing major highway network for other traffic, e.g. by routing through parallel residential streets.

## **2.3 Area of Specific Concern**

### **1. North Circular Road**

The Council is in negotiation with Transport for London regarding the future of many TfL owned properties along the North Circular itself. TfL's current road scheme will not address many of the concerns expressed by local people and the Council, particularly regarding an adequate reduction in traffic congestion and improved Air Quality . The need for improvement at this location is demonstrated in the recent Air Quality Plan of the mayor's Air Quality advisor. The Council's proposed Area Action Plan provides an opportunity for the Council and local community to look forward beyond the improvements currently planned, and the Council has agreed with TfL that the possibility of further improvements to increase capacity should not be ruled out or jeopardised and that appropriate "safeguarding" should occur. It is inconceivable in our view that over a 20 year period the Enfield/Barnet section of the A406 could continue without grade separation.

The challenges to improve access to jobs and address deprivation by encouraging investment in Outer London are recognized in the proposed MTS (Page 56) and the need to improve orbital road links are recognized too (Page 78). However, there should be clear and specific recognition of the inadequacy of

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<sup>6</sup> Tables 1.1 and 1.3 of Transport Statistics Great Britain 2008 Edition, DfT

the proposals agreed by the previous Mayor. Enfield urges that there be an urgent initiation of proposals involving much higher capacity improvement on the NCR through a scheme involving grade separation. Indeed, this is a specific instance of why Enfield welcomes the Proposal 34 (page 155), as a positive change from the previous Mayor's bias against major road proposals.

## **2. North Eastern Enfield including Ponders End**

The Council's Area Action Plan for North Eastern Enfield including Ponders End makes the most of the strategic location of Ponders End within the London-Stansted-Cambridge-Peterborough growth corridor, and its location within the Upper Lee Valley Opportunity Area. Further, it pursues the North London Strategic Alliance's vision for the Upper Lee Valley which identifies Ponders End as a major opportunity area, so close to The Lee Valley Regional Park too, for change and investment. The area suffers from particularly poor east-west access and access to the M25. This needs to be rectified in order to attract much needed investment in social infrastructure to support existing and emerging communities, in this significantly deprived area.

Clearly focussed transport investment is vital for North East Enfield to thrive as a competitive industrial business location which sustains key industrial areas of Brimsdown, Freezywater, Innova Park, and Meridian Way. These areas are the focus for environmental improvements and investment, developing new industries particularly in the high-tech and green industry sectors.

## **3. Central Leaside including Meridian Water**

The Council is working with Transport for London to improve connectivity, both north-south and east-west, to make best use of Meridian Water and Central Leaside's strategic location within the London-Stansted-Cambridge-Peterborough growth corridor, and its' location within the Upper Lee Valley Opportunity Area. The Council's actions contribute to attaining the North London Strategic Alliance's Vision for the Upper Lee Valley, which identifies Central Leaside as a major opportunity for change and investment. The West Anglia Route Modernisation programme, including the four-tracking of the London-Cambridge railway is critical to the regeneration of this part of the Upper Lee Valley. Additional

pressure will also be placed on services by a busier Stansted Airport. Whilst some limited improvements are proposed, there is a clear need to press for the delivery of 4-tracking on the Lea Valley Line from Coppermill Junction to Broxbourne by 2019. A solution to existing constraints on access to Liverpool Street, as well as enhanced Stratford services including to Chingford, are also required.

Quite apart from the need for additional capacity there is the continuing problem caused by the level crossings along the line, which over time have come to symbolise a physical barrier between communities in eastern Enfield. In the event that four tracking does not proceed, the Government has indicated that, as a minimum, additional train frequencies will be required on the Liverpool Street – Stansted corridor. If this happens, that physical separation will become more acute as crossings will be down for longer periods than now. This serious problem needs to be addressed if we are to continue to promote the area as an opportunity for employment and homes.

Enfield continues to believe that there is scope over the Plan period to consider an extension of the Victoria Line to serve Central Leaside and that in the absence of any real improvement to the Liverpool Street – Stansted – Cambridge corridor such an extension becomes imperative to cope with the growth in population and employment anticipated over the Plan period.

#### **4. Great Cambridge Road**

Sections of the Great Cambridge Road (A10) are clearly inadequate to cater for the demand through very significant proportions of the working day; traffic stress, accidents, delays, air pollution, noise are of acute concern to residents and businesses in this part of Enfield which is vital to the economy of Enfield and the North London Region. This is exacerbated by the number and frequency of intermittent reductions from three lanes to two along segments of this vital and heavily trafficked road between the M25 and the A406. This segment of the A10 between the A406 and the M25 also records an inordinate number of serious and fatal accidents each year.

Extreme congestion on the North Circular Road west of the A10 induces traffic, much of it commercial, to use the M25 instead of the North Circular Road by using the relatively short segment of the A10 to transfer from the North Circular Road to the M25 . This transfer contributes to severe congestion on the segment of the A10 between the North Circular Road and the M25. It is vital, to Enfield and to the whole North London region that capacity on the A10 be increased to adequate levels, based on a strategic assessment of the functions of the entire route.