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Mayor Boris Johnson
Mayor of London
City Hall
The Queen's Walk,
London SE1 2BR

12 January 2010

Dear Mr Johnson,

Islington Council's response to the draft Mayor's Transport Strategy

Thank you for the opportunity to comment on the draft Mayor's Transport Strategy (MTS). This letter sets out Islington Council's response to your consultation questions and highlights where we would like to see amendments made to the final strategy.

I respond to each of your questions in turn below.

Question 1: Transport for London is proposing a range of measures to improve travelling in London; for each category listed below (Tube, rail, interchange, cycling, walking, buses, information, streets, freight, the Thames) please identify all those that you consider would bring most benefit?

We have listed the measures to improve travel in London that you have proposed for each category in order of importance and have included a brief explanation where necessary.

Tube:

1. Expanding step-free access – The Council strongly supports the aims of step-free access and in principle, the programme itself. However, from our experience in Islington, the delivery of conventional step-free access schemes appears extremely expensive and disruptive. We would therefore ask you to investigate a more cost-effective and hence deliverable means of enabling mobility-impaired people to use the Underground. Competitions for a new Routemaster bus and Tube cooling systems have been held recently, and a similar approach may work in this case.
2. More frequent trains – We support the current and proposed upgrades to the Victoria and Piccadilly lines, which will provide much needed capacity improvements through Islington, including on some of the most crowded sections of the Tube network.
3. More Tube lines – The Council supports more Tube lines, not only when they are planned to unlock or support new areas of development, but in particular where they integrate effectively with the existing network and alleviate congestion on surrounding lines. It is

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important that the final MTS recognises that the introduction on new Tube lines is very likely to increase the overall number of passengers across the network and as a result the number of passengers passing through or interchanging at key stations (for example, Finsbury Park and Highbury & Islington). No Tube lines should be developed until these key stations are upgraded and have the capacity to support anticipated growth in passenger numbers within the station itself as well as at street level in the surrounding area (for example, public realm improvements to increase pedestrian capacity and reduce casualties and crime, and provision of secure cycle parking). Furthermore, any decision to make the significant investment necessary to deliver new Tube lines should be very carefully weighed against the benefits of a similar level of investment in walking and cycling.

4. Air conditioning on trains – Depending on cost, this could be a useful measure to improve conditions for Underground passengers. However, if costs are too high, investment should be focused on measures to increase capacity, with air conditioning being added opportunistically as lines are upgraded and new rolling stock purchased.

Rail:

1. Building more rail lines – The Council strongly supports further development of the Chelsea-Hackney line on its current alignment (including stations at Angel and Essex Road). The scope for altering the safeguarded route is minimal, at least through central and inner London, so the proposed review should not be too broad as this can only lead to unnecessary delay.
2. Enabling passengers to use Oyster Pay-As-You-Go across all rail in London
3. Creating an improved service for inner and outer London – The Council strongly supports the committed service improvements set out in the TfL Business Plan and the Higher Level Output Specification (HLOS) 1 and identified in the MTS.
4. Improving the cleanliness, security and quality of suburban rail services
5. More capacity on the DLR and Tramlink

Interchange:

1. Improving the design and quality of areas around stations and termini – The Council strongly supports the proposal to improve the areas around stations and termini. In particular, the Council recognises the importance of this work in helping surrounding street networks and in turn local residents and businesses to cope with increasing numbers of passengers accessing the station and/or its surrounds. Islington Council is well aware of the impact that the development of the new Crossrail/Thameslink station in Farringdon will have on the surrounding area, and would welcome the Mayor's help to improve the design and quality of the public realm around this station before passenger volumes increase significantly.
2. Redesigning stations to provide more capacity – The Council strongly supports the redesign of stations to provide more capacity. The MTS claims that committed projects within the MTS including Crossrail, Thameslink upgrade, Overground expansion and Underground improvements on the Victoria, Piccadilly and Northern lines, will increase public transport capacity by 30 per cent. Without work to provide more station capacity, key stations across the network will become 'bottlenecks' similar to those experienced at Finsbury Park and Highbury & Islington stations on match days at Emirates Stadium, where queues entering the station have to be carefully managed to ensure public safety.
3. Reducing the need to come in to central London to interchange for journeys to other places

4. Providing facilities to drop off car passengers so they can continue their journey by public transport – The Council feels that this function can be better catered for through improvements to the bus network than through increased convenience for car drivers.

Cycling:

1. Other – The Council believes the Mayor should re-commit funding to the development of the London Cycle Network. We support the introduction of Cycle Superhighways and the London Cycle Hire scheme, but we remain concerned that a disproportionate level of investment is being focused on these signature projects to the detriment of measures to make cycling safer on key routes and indeed in every street across London. If a true ‘cycle revolution’ is to take place, increased funding must be made available for all types of cycling infrastructure and promotion. The loss of LCN+ funding is of particular concern to Islington, and the other eight boroughs within the London Cycle Hire scheme boundary, as there is likely to be a significant increase in the number of novice cyclists on the road as a result of the scheme.
2. Providing more secure cycle parking – The Council would be keen to work with you to provide more and better secure cycle parking, particularly at key stations and interchanges.
3. Providing more cycle training – The Council has committed 2010/11 LIP funding to continue our very successful cycle training programme in spite of a significant reduction to our LIP funding allocation. We would be eager to expand the cycle training programme should more funding for local cycling initiatives be made available.
4. Introducing Cycle Hire schemes – This is an exciting scheme to which the Council is strongly committed, though only one part of the comprehensive programme that would be required to achieve an actual ‘cycle revolution’.
5. Introducing specially designated Cycle Superhighways – The Council welcomes TfL playing a more central role in encouraging cycling and removing some of the most dangerous locations for cyclists on the TLRN, and we hope that eventually all red routes will be transformed into ‘cycle superhighways’. However, the initiative needs to be delivered alongside continued improvements to local cycle routes to cater for those cyclists who feel less comfortable on busy roads, and the superhighways need to continue through central London rather than abandoning cyclists at the edge of the congestion zone.

Walking:

1. Improving the quality and design of streets – The Council has delivered many high quality public realm projects in recent years (including the award-winning Old Street ‘Promenade of Light’ and Whitecross Street Market), and will continue to do so as funding becomes available. It is also essential for TfL to work co-operatively with boroughs to improve the TLRN, not just through TfL funding but also where funding has been secured from within the borough, from central government, or from Section 106 agreements. This funding is useless without support from TfL to implement much needed improvements on the TLRN.
2. Improving pedestrian access to stations and improving safety in surrounding areas – The Council will continue to improve access to stations and improve safety in surrounding areas as funding becomes available.
3. Improving signs and other information to help people find their way better – The Council will continue to roll out its successful wayfinding scheme.
4. Tackling crime and fear of crime – Over the last two years, the Council has delivered a number of pedestrian lighting projects to boost the night-time economy in town centre areas and reduce the fear of crime at locations on key walking routes. Two of these

projects were undertaken on the TLRN with the permission and assistance of TfL. The Council would welcome TfL's support (funding or in kind) on more projects of this type.

5. Providing more information about journeys that could be undertaken by foot

Information:

1. Other – The Council feels that improving the travel information assistance provided on-board buses and at bus stops is the highest priority for transport information in London. The Council supports the delivery of the 'i-bus' system, but is concerned that boroughs will not be given enough opportunity to feed into plans for the roll-out of the system. Identification of priority stops, areas and routes must be carried out in consultation with the boroughs.
2. Providing travel planning and guidance to assist people in deciding how to travel
3. Improving the travel information assistance provided at stations
4. Enhancing the provision of up to the minute information, for instance online and by text message
5. Introducing journey planning tools which are focused on specific areas, for example town centres
6. Building consistent signage and information for cyclists and pedestrians – Signage should be consistent in terms of quality of provision, but individual boroughs must be allowed to customise the London-wide design for the local setting.

Better streets:

1. Introducing shared space schemes to improve the look and feel of streets and make them safer – The Council strongly supports the introduction of shared space schemes, as well as continued development of a design language that meets the needs of all users.
2. Removing unnecessary signage and clutter – As stated in Islington's response to the 'Way to Go' Direction for Travel document, the Council strongly supports your commitment to reducing street clutter and excessive guard railing, and hopes that the A1 in Islington will be an early beneficiary of this commitment. Holloway Road through the Archway and Nags Head town centres are in particular need of attention from TfL, with input from the Council.
3. Encouraging the uptake of low emission vehicles – The Council supports the uptake of electric vehicles in principle, and were among the first boroughs to establish on-street electric vehicle charging points for use by residents. However, the final MTS should recognise that low emission vehicles will need to be promoted carefully to ensure that their introduction does not result in modal shift from walking, cycling or public transport to electric vehicle use and in turn increased traffic and parking congestion.
4. Using high quality and attractive materials for pavements and streets

Freight:

1. Other – The Council condemns the recent decision to disband the Metropolitan Police lorry safety unit. We believe this decision will decrease compliance with lorry safety standards, which will in turn lead to increased cycle fatalities and serious injuries, especially amongst female cyclists. We are concerned that this decision must have been made in the absence of a valid Equalities Impact Assessment, and must be reviewed and reversed as soon as possible.
2. Other – The Council supports the continuation and expansion of the Freight Operators Recognition Scheme (FORS), though this voluntary scheme should not be seen as a replacement for firm enforcement of compliance with lorry safety standards.

3. Other – Sub-regional Freight Quality Partnerships should be supported.
4. Encouraging out-of-hours delivery – Though noise issues for residents must be taken into account.
5. Building more centres to transfer freight to cleaner vehicles for local deliveries – While space for freight transfer facilities is unlikely to be found in Islington, the Council recognises the potential benefits of such centres.
6. Promoting use of the Thames and other waterways for freight

The Thames:

1. More environmentally friendly boats
2. Introducing Oyster on passenger services
3. Other – Co-ordinating passenger services to provide a better river-based public transport network to ease congestion on Tube and rail services.
4. Raising service standards [to] make them consistent with other public transport
5. Introducing more stops

Question 2: Demand management – Despite all the improvements outlined in the draft Strategy, increasing population and demand for travel mean congestion and CO₂ emissions might still be a significant problem for London. The draft Strategy proposes that in this case it may be necessary to consider a fair system of road user charging to reduce congestion. To what extent do you agree or disagree that a fair system of managing demand for road use should be used if necessary?

Agree – Islington council agree that a fair system of managing demand for road use should be used if necessary.

More importantly, the Council believes that the final MTS should be a collection of policies and proposals that give the Mayor, TfL and the London Boroughs confidence that the targets set within it can be achieved. As it stands, the Mayor does not seem convinced that the implementation of the draft MTS will definitely achieve its targets. The MTS states: 'In the life of the strategy, the Mayor may consider road user charging schemes if other measures at the Mayor's disposal are deemed insufficient to meet the strategy's objectives.'

The final MTS must also include interim targets and must set out the policies and proposals that their non-achievement will trigger. Policies and proposals triggered may include greater investment in walking, cycling and public transport infrastructure, and the implementation of increased travel demand management measures such as road user pricing.

Question 3: Western extension – The draft Strategy proposes to remove the Western Extension of the Congestion Charging scheme after introducing measures (including improved traffic control systems and a Roadworks Permit Scheme) to mitigate as far as possible the impact of its removal. To what extent do you agree or disagree with this proposal?

Strongly Disagree – Islington Council strongly disagrees with the proposal to remove the Western Extension of the Congestion Charging scheme.

Introducing measures such as improved traffic control systems and a Roadworks Permit scheme may go some way to alleviating congestion and 'smoothing traffic flow', but they will not help fully

offset the most damaging outcome of the Western Extension's removal – the increase in traffic volumes overall and the resulting increase in air pollution and CO₂ emissions.

The Council commends the Mayor's ambitious carbon emission reduction target for land-based transport in London – a 60 per cent reduction on 1990 levels by 2020 – but the decision to remove the Western Extension will clearly undermine its achievement. The Mayor's own draft Air Quality Strategy also published recently, sets out the significant impacts of removing the scheme – that is, an 11 to 18 per cent increase in congestion in the zone and a six to twelve per cent increase in CO₂ emissions from land-based transport in London. In addition, the significant loss of revenue and the investment required to remove the existing system will require further cuts from elsewhere in TfL's budget, and other measures proposed to off-set the increased congestion (such as reduced pedestrian crossing times at signals) could be better spent and will make London less pedestrian-friendly.

Question 4: Any additional comments?

Spending priorities – When TfL decided it was not cost effective to invest in Holloway Road station, it announced that significant investment would be made to enhance the capacity of Highbury & Islington and Finsbury Park stations. This investment was to be made so that the stations could cope with the crowds on Emirates Stadium match days. The Council is extremely disappointed that neither of these schemes were included in the current TfL Business Plan, but is eager to work with TfL to ensure that interim 'scaled down' schemes are implemented at each station as soon as possible to provide local people and football supporters with some relief on match days.

At present the only scheme committed to for Highbury & Islington station is one to establish a new station operations room. This station operations room is needed to support the arrival of the East London Line. However, there is some potential for an expanded scheme that would deliver benefits to the local community. The Council is prepared to use its own money and will seek to use some Section 106 funding from Arsenal to fund a broader scheme that would provide an additional entrance/exit next to the current ticket hall. This entrance/exit would provide some increase in ticket hall capacity, aimed at reducing crowding and the lengthy queues that gather outside the station after a match. In order to release Section 106 funding for the scheme, London Underground must provide evidence that the new exit/entrance will help to relieve crowding on Emirates Stadium match days. The Council would urge London Underground to produce this evidence as soon as possible so that the scheme may be progressed.

The Council also notes that Emirates Stadium has been listed as a likely venue for the 2018 World Cup, should England's bid prove successful. The Mayor should keep this in mind when short to medium term transport investment decisions are being made.

Removal of Traffic Gyratories – A scheme listed as 'further gyratory, one-way systems and bottleneck improvement works' is included in the delivery plan of the draft MTS. The Council is committed to the removal of traffic gyratories at Archway, Highbury Corner, Old Street and Kings Cross, and would like to see reference to these specific schemes in the delivery plan of the final MTS. As stated in our response to consultation on the 'Way to Go' Direction for Travel document, we welcome your work with us on progressing a scheme for Highbury Corner, and hope that you will also commit to restarting work on the options for Archway and Old Street. The Council has some funding available to investigate this work and would be willing to work with you to identify further funding opportunities for these schemes.

Unambitious modal shift targets and a reliance on low carbon technology – The aim to increase the mode share of walking, cycling and public transport from 58 per cent in 2007 to 64 per cent by 2026 is not very ambitious, especially given that, according to the draft MTS, 'London has

achieved a five per cent mode shift from the car between 2000 and 2007'. The Council would like to see more ambitious mode shift targets included in the final MTS.

Figure 28 of the draft MTS shows that travel by car and motorcycle accounts for 49 per cent of carbon emissions from ground-based transport. The Council commends the Mayor's commitment to reducing this contribution by incentivising and investing in electric vehicles and low carbon technology, but we are concerned that these technologies are being seen as a panacea, rather than as one small part of the overall solution. It is critical that the final MTS places a stronger emphasis on reducing travel by private motor vehicles. It is important that the final MTS should acknowledge that carbon emissions are not the only negative impacts of a continued rise (in absolute terms) of travel by private motor vehicle. Congestion, parking pressure, road safety and community severance are some of the very real impacts of high levels of car use.

Disproportionate investment in signature projects over local improvements – As stated under question 1 above, there are proposals in the draft MTS that support cycling, such as the Cycle Superhighway and London Cycle Hire schemes. Though the Council supports the introduction of these projects, the draft MTS reinforces the disproportionate level of investment that has been made in signature projects (such as the London Cycle Hire and Cycle Superhighway schemes) to the detriment of financial support for the London Cycle Network and local cycle safety improvements. The more flexible LIP funding arrangements introduced earlier this year allow boroughs to potentially continue to invest in cycle infrastructure improvements. However, borough funding is on the decrease overall, and there is an additional risk that some boroughs may choose to allocate a lower proportion of their LIP funding to cycling. For this reason, we fear that cycle infrastructure improvements will not match the pace of recent years under the LCN+ programme, which was not delivering improvements fast enough. We therefore believe cycle infrastructure funding should remain ring-fenced, and should increase from recent years rather than decreasing.

This situation is of particular concern in Islington, and the other eight boroughs within the London Cycle Hire scheme boundary, as there is likely to be a significant increase in the number of novice cyclists on the road as a result of the scheme. Further to this, paragraph 462 of the MTS states, 'There is also much that boroughs can do by working to prioritise cycling in their LIPs.' Unfortunately, without an injection of additional funding as set out above, Islington and many other boroughs will struggle to continue achieving the cycle casualty reductions we have been able to achieve in recent years.

On a strategic level, TfL must lead a process to identify the key cycle networks throughout London, extending and fine-tuning the existing LCN+ but also incorporating greenways where appropriate, the new proposed cycle superhighways, and significantly improved cycle routes through central London for both experienced commuters and beginning cyclists.

Affordable and effective speed control – The Council is committed to reducing road accidents in London particularly those involving vulnerable road users. We note your previous comment that 'the days of the road hump are over', and that the draft MTS moves away from physical traffic calming towards 'affordable, equally effective and enforceable ... speed control alternatives'. However, as stated in Islington's response to the 'Way to Go' Direction for Travel document, the Council believes that the final MTS should give greater clarity in terms of what you see as the alternative.

The Council would agree that speed humps are not an ideal solution, but they are currently effective and feasible for certain situations, and do save lives. Unfortunately, the MTS does not outline what alternatives are being considered, and while the Council would be the more than willing to work with TfL to pilot any new measures or approaches, we are concerned that these have not yet been identified, and that in the meantime, traffic speeds and casualties will increase. With Islington soon to be covered by a borough-wide 20mph speed limit on all residential streets, we may need to supplement this with either physical measures or increased enforcement in the

future. As speed enforcement is not a power we are currently able to exercise as a borough, physical traffic calming is the only tool we would be able to call upon if the 20mph speed limit does not adequately reduce traffic speeds and casualties. In addition, there is a desperate need for road safety improvements on the TLRN, such as those so badly needed at the junction of Fieldway Crescent, Madras Place and Holloway Road. The final MTS should be stronger on this point, including casualty reduction targets for the TLRN.

By the far the quickest, least expensive and most effective way to reduce traffic speeds and road traffic casualties would be the implementation of a blanket 20mph speed limit in all of London's residential areas, and we would encourage you to re-consider this measure for inclusion in the final MTS.

Road user hierarchy – London's roads will never be able to accommodate everyone who wants to use them for various purposes. We feel that a road user hierarchy is an effective tool for sending a clear message to the community about which users will be given priority. The Council is disappointed that the draft MTS has moved away from a road user hierarchy towards a greater emphasis on persuading motorists to try other modes of travel. Should the final MTS not include a road user hierarchy, it must at least include more information about how the needs of various road users will be balanced.

'Smoothing traffic flow' and countdown timers – While the Council welcomes any measures to reduce unnecessary congestion from London's streets due to poorly planned and managed streetworks and the like, we are concerned that congestion reduction could become TfL's primary purpose, at the expense of pedestrian and cycle priority, particularly in the absence of a road user hierarchy. The Traffic Management Act requires highway authorities (including TfL) to manage traffic flow for all modes, not just general motorised traffic, so we would remind TfL that measures to make general vehicle travel more reliable should not be implemented if they make walking or cycling more dangerous or even less convenient.

The Council is specifically concerned about the recent trial of countdown timers at signalised pedestrian crossings. While we see the countdown timers as a positive step, to improve pedestrians' understanding of when they are allowed to cross and how long they will need to wait before crossing, we are concerned that the report summarising the results of the trial explicitly stated that the objective was to 'smooth traffic flow', not necessarily to make streets safer for pedestrians or to increase walking. TfL suggested that pedestrians would benefit from the proposal because countdown timers could remove existing ambiguity about when it's safe to cross. But rather than using the new timers to allow pedestrians to make full use of their existing crossing time, TfL propose to reduce the 'invitation to cross' green man phase to the national minimum (which they refer to as the 'DfT recommended time' of 6 seconds). This is far from adequate at most if not all signalised crossings in Islington, and possibly across London.

The 'Abstract' of the report of the trial concludes that during the two-month study, pedestrians did report less satisfaction with crossing times, and more disabled and older people felt rushed while crossing. This is not surprising considering that crossing times have never been long enough on most of Islington's part of the TLRN, so shorter times will seriously exacerbate this problem.

We feel that a better approach would be to implement countdown timers alongside measures to make possible and to encourage diagonal crossing at pretty much all junctions across London with 'all-red' signal phases, and possibly to extend crossing times at most of these junctions rather than reducing them. Using this approach, people will be encouraged to walk for many more local trips, and this alone would help remove existing traffic from the street and thereby reduce congestion. Conversely, we would suggest that measures to smooth traffic flow that focus on disadvantaging more sustainable and healthier modes by prioritising motor vehicle traffic will only serve to encourage additional drivers on London's streets, which will rapidly eat up any road capacity freed

up by the measures and will ensure that congestion levels stay constant. Indeed, congestion levels (alongside air pollution, carbon emissions and casualties) could very well worsen as a result.

‘Green Wave’ Traffic Lights on the TLRN and Borough Principal Roads – The Council would like you to consider piloting ‘green wave’ traffic lights. Under this system, drivers who drive at a constant (and safe) speed are rewarded with a green light at each junction. We suggest that people who drive at an average cycling speed (12-15 MPH) could be rewarded. This would not only reduce speeding, but would also remove the incentive for cyclists to jump traffic lights.

The Council would be willing to work with you to investigate the scope for this technology in Islington, such as on the A1.

‘Needs-based’ LIP funding prioritisation – The Council agrees with London Councils that the draft MTS has not given adequate consideration to population growth, employment growth and social deprivation. Even more significantly for Islington, we believe that the changes to LIP funding arrangements proposed by TfL and agreed by London Councils earlier this year did not take into account the issue of where growth would be most intense in coming years. As a result, Islington is facing intense growth in population and employment, but has suffered a reduction of over £1-3 million a year in its annual LIP funding allocation.

The draft replacement London Plan sets Islington one of the highest housing delivery targets in London (11,700 new dwellings over the next ten years), almost double the target set for the larger neighbouring borough of Camden. Islington’s draft Local Development Framework (LDF) Core Strategy includes projections for an additional 32,234 jobs (54 per cent increase) in the borough by 2026. In addition, the Council is tackling the ongoing challenge of reducing the existing high levels of social deprivation in the borough. Surely these figures demonstrate a clear ‘need’ for additional funding, rather than the significant cut that we have received?

We feel that our regeneration aspirations for Archway and the south of the borough (particularly around Old Street) are not supported by the Transport for London investment programme, and I would urge you to work with us to identify what can be done in transport terms to support population and employment growth particularly in these areas.

Recent investment priorities have tended to focus on large-scale former industrial sites. Islington has a very limited supply of these sites and our delivery is therefore achieved through densification on numerous smaller scale sites. There is therefore a need for transport investment decisions to support this cumulative type of approach as well as the more traditional approach of improving access to large scale, less accessible sites.

Door-to-door bus services – The previous Mayor promised and failed to deliver a comprehensive and ‘strategic’ review of door-to-door services in London, and the Council would again urge you to undertake this review. The current arrangements are complex and costly and utterly fail to meet the needs of mobility-impaired and older people. There appears to be little coherent and consistent thinking about the allocation of funding to these services. For example, TfL has refused to fund Islington’s hail-and-ride (route 812) and ScootAbility schemes, despite the fact that the average cost per trip of these schemes is far cheaper than Dial-a-Ride, and investment in these less expensive services could significantly reduce the cost of providing the Dial-a-Ride service. The overall aim of the review should be to identify a package of measures that best meets the diverse needs of older and mobility-impaired people whilst offering value for money to funding bodies including the London Boroughs and Transport for London.

We feel that a review of door-to-door services must be carried out as part of an overall strategic review of bus services in London. Such a review would form the foundation of a cohesive network of mainstream, hail-and-ride and door-to-door services across London, providing better value for money and improving access for all Londoners. Such a review would not necessarily lead to

changes on every existing bus route or even the majority of routes. However, the review would give boroughs an opportunity to understand and influence TfL's bus network planning process in a way that we have been unable to in the past, and would ensure that London's bus investment leads to an optimal outcome for all Londoners.

Air quality and the Low Emission Zone (LEZ) – The Council has supported the LEZ from its conception and are disappointed about the proposed delay to phase three of the scheme, which would mean larger vans and minibuses will not have to meet Euro 3 emission standards until two years later than the original deadline. The delay will have a negative impact on pollution levels. The MTS states that, 'the introduction of LEZ Phase 3 in 2012 would reduce emissions of PM₁₀ by around 20-25 tonnes and emissions of NO_x by around 200 tonnes in that year.' On this basis it would seem reasonable to assume that delaying its implementation by two years will result in an additional 40-50 tonnes of PM₁₀ 400 tonnes of NO_x in the atmosphere, per year, leading to a range of negative health impacts and greater health inequality. This is not acceptable. The Council would urge the Mayor to reconsider his decision to delay phase three of the LEZ, and to reflect this in the final MTS.

Electric vehicles – As stated under question 1, Islington has long supported the uptake of electric vehicles, including through the provision of charging points, and we will continue this support. However, we do have some concerns about how electric vehicles are promoted. The draft MTS proposes the introduction of 25,000 electric vehicle charging points across London by 2015. These charging points must be implemented and promoted carefully to ensure that their introduction does not result in modal shift from walking, cycling or public transport to electric vehicle use and in turn increased traffic and parking congestion. The Council would like the final MTS to recognise this issue.

Air travel – Islington Council does not support significant growth in airport capacity in southeast England. We believe that demand for air travel can easily be reduced through improvements to the national rail network, and through fairer taxation and subsidy policies to provide a level playing field for rail travel to better compete with air travel. We are disappointed that the draft MTS has coupled London's economic competitiveness with its airport and runway capacity, and would like the final to state a lack of support for airport capacity expansion in the southeast.

Bus fare increases – The Council opposes the recently announced bus fare increases, and questions why an effort would be made to reduce costs faced by businesses in meeting the requirements of LEZ phase 3 compliance, but would willingly raise the costs of bus use faced by businesses and residents alike. This decision will disproportionately impact on the poorest people in our community, and should therefore be reconsidered. As you would also be aware, the Council is seeking greater flexibility and equity in the fares system for bus journeys. We continue to believe that bus tickets should be valid for one hour and that within that period passengers should be able to make as many trips as they need. This system seems to work well in other European cities.

Asset Maintenance – Maintaining existing infrastructure is as important as investing in new infrastructure, and is more cost effective. The Council is disappointed with the huge negative impact that a small number of poorly managed rail and Underground facilities have on the amenity of key places in Islington. We receive frequent complaints about the squalid appearance of Islington's Underground stations, with the worst offenders being Archway, the disused Highbury & Islington ticket hall, and the rear of Angel station fronting onto City Road. It would not take much for London Underground to smarten up these stations and keep them looking smart, and we would be happy to work with you to achieve this.

Public Toilets/Baby Changing Facilities – Public toilets are another neglected area. As a bare minimum, we would like you to commit to ensuring that all new rail stations and bus stations provide public toilets with disabled access and baby changing facilities.

Delivery Plan and performance targets – While the Council acknowledges that the requirements set out in the draft LIP guidance for boroughs are generally reasonable, we note that boroughs are being required to set out far more detail than has been included in the draft MTS. Specifically, we feel that the final MTS should include a Performance Monitoring Plan setting out the indicators that will be used to measure the success of the strategy, and interim targets that will be achieved through implementation of the Delivery Plan.

I look forward to working with you to deliver transport investment that meets the needs of our local community as well as the wider economic and social needs of Central London.

I look forward to your response to these issues.

Yours sincerely,

A handwritten signature in blue ink that reads "Seema Manchanda". The signature is written in a cursive style with a light blue background behind the text.

Seema Manchanda
Service Director – Strategic Planning and Regeneration