

London Borough of Sutton Comments on draft revised Mayor's Transport Strategy

1. General Comments

- 1.1 The council welcomes the publication of the draft revised Mayor's Transport Strategy setting out the Mayor's policies and priorities for transport in the capital over the next twenty years. This strategy will build on the considerable achievements on transport under the previous Mayor and since the inception of Transport for London (TfL) and the Greater London Authority (GLA) ten years ago. The council also welcomes the simultaneous publication of the draft revised London Plan and Economic Development Strategy, which should ensure that these three important documents are consistent.
- 1.2 The council broadly supports the six overarching goals of the strategy, although the inclusion of a goal about the 2012 Olympics is questionable in a twenty year strategy. It is encouraging that the new Mayor is continuing broadly with the approach to transport policy established by the previous Mayor in the first Transport Strategy, with an emphasis on supporting economic development and growth, reducing the adverse environmental impact of transport both globally and locally, and encouraging greater use of sustainable modes of transport such as walking and cycling.
- 1.3 As an outer London borough we welcome the increased emphasis in the strategy on improving transport in outer London, along with the setting up of the Outer London Commission (OLC) to look at wider development issues and the role of transport in supporting growth. We welcome the recommendation of the OLC to develop a 'hub and spoke' approach to transport around the outer London town centres and strategic business locations, and the decision to abandon the proposed 'super-hub' approach that would have concentrated activity in a smaller number of large centres such as Croydon. We also welcome the proposal for sub-regional transport plans to provide more detailed proposals for each sub-region, as long as the boundaries are 'fuzzy' to take account of cross boundary movement and inter-action, including movement across the Greater London boundary.
- 1.4 In the current financial climate we recognise that the funding available for transport is constrained and it is therefore important to achieve value for money and spend limited resources wisely. A significant proportion of London's transport budget over the next few years will be tied up in Crossrail, the Olympics, the Tube upgrade and a number of other major infrastructure projects. Whilst these are important to the wider economy of London they are of limited direct benefit to Sutton. It is therefore important that outer London boroughs that are not directly benefiting from these projects continue to receive adequate funds for smaller scale local improvements, such as Sutton's Integrated Transport Packages which we are implementing to 'lock-in' the benefits of our Smarter Travel project through physical improvements for sustainable transport.
- 1.5 We welcome the strategy's call for greater Mayoral powers over national rail in London, as a borough that is dependent on 'heavy rail' for longer public transport journeys, in the absence of a tube line. In this regard we welcome the requirement for 'London Overground' style standards at Southern suburban stations as part of the new South Central franchise, and look forward to greater TfL involvement in, and funding for, rail station and service improvements in South London.

2. Detailed comments

Modal Split Targets

- 2.1 The modal share targets for 2031 are somewhat lacking in ambition and could be bolder. In particular, the target of 5% of all journeys by bicycle in 22 years time is somewhat timid, given the priority cycling has in the strategy and that fact that many other European and some UK cities (such as Oxford, Cambridge and York) have cycling rates of up to 20% or more. With such a currently low modal share in London (around 2%), there is considerable scope to increase cycling rates and achieve a target of say 10% by 2031, given sufficient investment in good quality cycling infrastructure and a cultural change in attitude towards cycling. The National Cycling Strategy published by the previous Conservative administration in 1996 had targets to double cycle use by 2002 and double it again by 2012 but these targets were abandoned by the current Labour administration as it was felt they were unrealistic and would not be met. However, central and inner London has already achieved a significant increase in cycling, due in part to the congestion charge, which demonstrates what is possible with the right policy mix.
- 2.2 Similarly, a 1% modal share increase for walking and a 2% increase for public transport over 25 years is not going to achieve the 'step-change' that is required to seriously reduce transport's contribution to climate change, air pollution and congestion, and improve public health and well-being, especially as private motor traffic is likely to grow over that period (albeit perhaps with more environmentally-friendly vehicles). Admittedly the modal shares for walking and public transport, unlike cycling, are already quite high, and it will be difficult to achieve a significant reduction in car use in outer-London without additional fiscal measures. Sutton has seen an 85% increase in cycling trips over the last two years, albeit from a low base, which could be partly attributed to our Smarter Travel Sutton project. Sutton council has adopted ambitious transport and CO₂ targets in its One Planet Action Plan as part of our commitment to become a 'One Planet Borough'.
- 2.3. It appears that there are no targets in the strategy for road traffic reduction, as required by the Road Traffic Reduction Act 1997 and included in the previous strategy (albeit quite weak in relation to outer London). If a modal shift to more sustainable transport remains the policy of the new strategy and is to occur, there will be a need to reduce road traffic levels, and therefore targets are needed.
- 2.4 Figure 2 is useful in setting out clearly the links between the goals, challenges and outcomes, as is Figure 4 setting out the hierarchy of journeys and modes.

Orbital Public Transport

- 2.5 We welcome the recognition in Para. 3.1.3 of the importance of orbital public transport corridors, particularly in outer-London, although there still seems to be an over-reliance on radial capacity at the expense of orbital movements. Sutton lies on the orbital corridor between the two major employment centres of Croydon and Heathrow which the strategy acknowledges generate a significant number of orbital commuting trips. The orbital express bus X26 serves this corridor and has recently had its daytime frequency doubled from hourly to half-hourly. This appears to have attracted more passengers, and certainly offers a better service and encourages more use of this important orbital express bus service. The council would like to see further enhancements to this route, including an extension of the half-hourly frequency until the last bus in the evening, and the reintroduction of the stop at The Plough in Beddington to plug the long gap between the stops at East Croydon station and Wallington Green. Ideally we would like to see the service made a 24-hour route as it serves a number of key town centres with considerable night time economies, and the airport which operates virtually 24-hours a

day. This is particularly pertinent as Sutton has recently lost its orbital night bus connection with Croydon with the withdrawal by TfL of the N213 on that section of the route.

2.6 We would like to see major enhancements to orbital public transport links in outer London, together with measures to improve bus priority and reduce congestion bottlenecks on the road network. Apart from the limited stop X26 express bus, which now no longer goes beyond Croydon to Bromley and Dartford as did the former 726, there are no long distance / express orbital bus routes in outer south London. This often means people who rely on public transport have to make radial rail journeys into inner or central London and out again, or make several changes by bus, tram or train, to travel orbitally (e.g. Sutton to Bromley or Orpington). There is therefore scope for further 'express' or limited stop bus services like the X26, perhaps linking key outer London town centres, stations and other major destinations. There is also scope to enhance shorter orbital bus routes linking Sutton to its neighbouring Metropolitan town centres of Croydon and Kingston. For example, the 407 – the only direct bus between Sutton and Croydon - is not very frequent or reliable. The 213 between Sutton and Kingston is more frequent, but is quite slow due to traffic congestion, frequent stops and a circuitous route between New Malden and Kingston. There is no longer a direct bus between Sutton and Bromley South, a useful rail-hub for Kent rail services, following the curtailment of the 726 express bus service, and it would be useful to reinstate this link, and indeed continue it to Ebsfleet for connections with Eurostar and High Speed One services at the new international station.

2.7 The Strategy rightly recognises the importance of interchange, and where there is no direct public transport link then interchanges perform a vital function. It is therefore important that these interchanges are pleasant and convenient to use, and that, as far as possible, different services and modes connect well. We believe there is significant scope to improve a number of key South London interchanges used by Sutton residents, including Sutton Station (rail-bus-taxi), Morden Underground Station (tube-bus), Wimbledon (rail-tram-tube-bus), West Croydon (rail-tram-bus), East Croydon (rail-tram-bus) and Clapham Junction (rail-rail). It is also important that services, both within and between modes, are designed to connect as closely as possible at these interchanges.

Bus service supply and demand

2.8 The relatively low residential density of many parts of Sutton makes it difficult to serve cost-effectively by public transport, which tends to be concentrated along key road and rail corridors. However, around 10-15 years ago the council initiated a number of 'hoppa' bus routes using smaller vehicles to serve residential areas that were not adequately served by conventional buses, usually on a 'hail-and-ride' basis. These 'S' routes proved very popular and are now part of the TfL franchised network. However, the requirement for accessible buses and larger vehicles has caused a few problems in narrower heavily parked roads. This more flexible approach to bus route provision could be a model for further public transport improvements in the borough and other parts of outer London and just beyond the London boundary. As an outer London borough that borders Surrey, it is important that the strategy recognises and supports improvements to transport routes across the Greater London boundary into neighbouring counties, particularly public transport connectivity.

2.9 We welcome the renewed emphasis on local trips too, and a "better allocation of surface space between pedestrians, cyclists and motorised modes" together with an improved public realm, and hope that TfL will continue to allocate sufficient funds to boroughs to implement high quality integrated schemes to support these local trips by sustainable modes, such as through Sutton's Integrated Transport Package approach.

2.10 Growth in employment and retail activity in outer London, including in Sutton town centre, Wallington and Hackbridge, together with housing and population growth, will generate additional demand for, and help support, improved public transport, as well as providing developer funding towards it. It is important, however, as the strategy identifies, to ensure that such growth does not lead to an increase in private motor vehicle trips, as well as undermine the 'suburban character' of outer London. In this regard, the recognition of the importance of integrating the planning and transport systems is welcomed.

2.11 In terms of supporting employment growth, the council has recently carried out transport and public realm improvements within the Kimpton Industrial Estate and is seeking the diversion of the S3 bus route through the estate. The council is also about to embark on a major upgrade of Beddington Lane which serves the borough's other major industrial employment area.

Tramlink

2.12 The council welcomes references in the document to Tramlink extensions (Para. 292). We would, however, like to see a stronger commitment in Para. 292 than "*consideration will be given to looking at further extensions of Tramlink...*" and hope that detailed feasibility work on the proposed extension(s) to Sutton can be taken forward within the period of the plan. The council remains firmly committed to an extension of Tramlink to Sutton town centre from the existing Croydon to Wimbledon line via Rosehill (an area of relative deprivation in need of regeneration) and St. Helier Hospital (which is scheduled for major expansion over the next few years).

2.13 The main issue is where this scheme sits in the priority of major projects on the list. Experience following the last MTS was that all major projects were prioritised, and trams scored poorly with only one extension to Tramlink being progressed (Crystal Palace), and this was ultimately shelved before being delivered. There are no major public transport projects planned for Sutton except the possible Tramlink extension. Trams can play a major part in creating sustainable growth in outer London, ensure connectivity to Metropolitan and district centres and, if provided by renewable electricity, make a major contribution to CO₂ reduction targets.

Smoothing the Traffic

2.14 The council supports the principle of 'smoothing the traffic' in terms of reducing congestion and stop-start driving, as long as this is not at the expense of pedestrian and cycle crossing times or convenience and doesn't encourage more traffic or speeding. The council has been linking traffic signals in two of the borough's more congested town centres – Worcester Park and Wallington – in order to smooth traffic flow and reduce delays to buses, and we hope TfL will come forward soon with a proposal to relieve another bottleneck, on the TLRN A232 in Carshalton village. There is also a need for a review of all traffic signal / crossing timings to reduce unnecessary delay to traffic and ensure consistency and an equitable balance of priorities between private motor traffic and other modes. This could include the introduction of bus detectors at key signalised junctions on bus routes to reduce delays to buses, and selective switching off of signals at less busy times of the day / night.

Behaviour Change

2.15 The council welcomes the commitment in the strategy (Para. 4.2.3.3) to changing travel behaviour through smarter travel programmes. Sutton has just completed its successful

three year pilot Smarter Travel Sutton project funded by, and in partnership with, TfL and it is encouraging to see that support for this approach is continuing with the roll-out of the scheme to Richmond. We would welcome a greater recognition of the success of Smarter Travel Sutton in the document, perhaps as a case study.

Freight

2.16 The council welcomes the recognition of the importance of freight transport to London's economy and the need to make provision for it in street design and road network planning. In this regard, the role of Freight Quality Partnerships (FQPs) in co-ordinating freight transport improvements should be recognised and adequate funds provided to continue the work of these and the TfL Freight Unit.

2.17 There is potentially a need for more overnight lorry parking on the edges of London and this is something that boroughs could be required to provide or facilitate, co-ordinated by the TfL Freight Unit.

Health

2.18 The strategy rightly recognises the link between transport and health (Para. 4.3.6) and in this regard Sutton has been working closely with the local Primary Care Trust, through its Smarter Travel Sutton project, in a programme called Active Steps aimed at encouraging more walking and cycling by patients to improve their health and fitness through exercise.

Bus Stop Accessibility

2.19 In terms of bus stop accessibility, Sutton one of the highest proportions of accessible bus stops in London, although parking at bus stops and on bus routes remains a problem, as much of the borough is not covered by CPZs. Illegal and obstructive parking by minicabs on bus stops and outside stations is also something that needs addressing. We would also encourage TfL to make all of the bus stops on the TLRN accessible, as many in Sutton are not and this reduces the effectiveness of the borough's programme. We would also welcome a higher standard and greater provision of bus shelters and countdown at bus stops and swifter replacement of damaged bus shelters.

Public Transport Availability

2.20 Para. 239 acknowledges the 24 hour, 7 day a week, 365 day a year economy of London and it is therefore important that public transport reflects this. This means providing services on all public transport routes on Sundays and Bank Holidays, with sufficient capacity to meet demand, and on a core network on Christmas Day and Boxing Day. Three of Sutton's bus routes – the S3, S4 and 470 – still do not have Sunday services, and one - the 463 - has only just started running on Sundays. Furthermore the Epsom Downs branch of the rail network has no Sunday service, and there are no rail services in the borough on Christmas Day or Boxing Day, and no buses on Christmas Day. Consideration should also be given to running key tube lines 24 hours a day, or at least later at night, especially ones serving airports and mainline rail termini. Trains, trams and buses should also serve the 24/7 economy. The absence of an effective 24/7/365 public transport service in London means that the significant percentage of households (around 35% in some Sutton wards and more in inner London) without access to a car are effectively 'cut off' or forced to rely on lifts, car clubs or taxis / minicabs at certain times. It is also important to ensure that London's public transport system is more resilient to 'extreme' weather, especially snow, so that there is no repeat of the complete close down

of the bus and rail network, and large parts of the tube network in London as occurred in February 2009, when Sutton had no rail service for two days.

Rail

- 2.21 In terms of the two major cross-London rail projects, Sutton stands to lose out. Not only do we not get any direct benefits from the Crossrail line, but we will lose our direct rail connection to Crossrail at Farringdon from the year 2015, when all Sutton / Wimbledon loop Thameslink trains will terminate at Blackfriars or London Bridge. This will also result in Sutton losing its direct connection to St. Pancras International for Eurostar and domestic inter-city rail connections, and Luton Airport. This seems to be a retrograde step as far as Sutton is concerned, although we recognise there will be corresponding benefits for other areas.
- 2.22 In terms of national rail, although Sutton's services and stations are not currently within the Mayor's remit, we have a number of concerns and hope TfL can bring pressure to bear on the TOCs / Network Rail with regards to these. One of these is that it appears that some of Sutton's station platforms will not now be lengthened to accommodate 10-car trains, as previously stated. These include Hackbridge, where the council is planning major housing and employment growth as part of its Local Development Framework which is likely to generate significant additional demand for rail travel, and Carshalton Beeches. Another issue of concern is the role of punctuality / reliability targets (Para. 276). These have undoubtedly improved punctuality and reliability in recent years, but appear also to have created a perverse incentive for TOCs to extend journey times to build in 'slack' to soak up delays, resulting in excessive dwell times at stations and trains leaving stations early. As a result, journey times between Sutton and Central London have increased in recent years (notwithstanding the new station stop at Mitcham Eastfields, which is welcome) and make Sutton less competitive in terms of rail access than other neighbouring outer-London centres with faster links, such as Croydon, Wimbledon and Bromley.
- 2.23 We welcome the establishment of the London Overground service under the control of the Mayor and the forthcoming East London Line extension to West Croydon (although this will mean a loss of Sutton's direct off-peak service to London Bridge). However, there is a gap in the outer orbital rail network between West Croydon and Richmond, and we would like to see this gap plugged by continuing the London Overground service from West Croydon to Sutton, then on to Wimbledon, Kingston and Richmond. The track for this route is largely in place, but there are track configuration issues at Wimbledon that would need to be addressed.

Bus Improvements

- 2.24 On the buses, we welcome the commitment to improving the bus network and infrastructure, while recognising the current budget constraints. It is important to provide as comprehensive a bus network as possible in outer London to provide a viable and attractive alternative to the private car. If necessary this network should be cross-subsidised from more profitable inner-London services and other TfL revenue sources such as the congestion charge. Specifically we would like to see the reintroduction of the night bus between Sutton and Croydon, perhaps using a limited stop service such as the X26 and following a more direct route than the previous N213 to reduce costs. We would also like to see enhanced bus links with neighbouring Surrey and perhaps Gatwick Airport, as well as improved orbital links as mentioned above. In order to attract more car users onto buses the journey experience should be as comfortable and convenient as possible, with high quality bus shelters / stops and reliable countdown information at as many stops as possible.

2.25 Although they did not serve Sutton, we would question the need to replace the 'bendy buses' with a 'New Bus for London' during the current financial climate and in view of the popularity and efficiency of the bendy buses in areas of high passenger demand where large numbers of people are boarding and alighting. Articulated single deck buses are used successfully in most other 'world cities', as opposed to less accessible double deck buses.

Taxis / Minicabs / Community Transport

2.26 In terms of private hire vehicles, Sutton relies predominantly on mini-cabs rather than black cabs, although there may be scope for more black cab ranks at stations and in town centres in the borough. In central London there would appear to be some abuse of the minicab licensing system by drivers taking advantage of the congestion charge concession. There is also a need to clamp down on bad driving and other dangerous or illegal practices by minicab drivers in order to increase public confidence in them. The TfL licencing and branding system goes some way towards this.

2.27 The section on Community Transport doesn't mention dial-a-ride, mobility buses and the taxi-card, which play an important part in transport provision for the mobility impaired. Sutton Community Transport is a very successful local specialised transport operator, and is keen to establish a scheduled demand-responsive community bus service in the deprived northern wards of the borough to serve areas with poor bus accessibility.

Managing the Road Network / Smoothing the Traffic

2.28 In the section on managing the road network and smoothing traffic flow, mention could be made of encouraging greater use of 'space-efficient' vehicles such as motorbikes / motor scooters, buses / coaches / minibuses, smaller cars such as the Smart car and G-Wiz electric car, bicycles and mobility scooters (which perhaps need greater recognition in policy terms due to their growing popularity). Taxis, car clubs and lift sharing also reduce the need for parking space, which is in short supply in many areas and a major cause of congestion on roads.

2.29 Improved traffic management training for police officers / PCSOs / Civil Enforcement Officers would enable them to better manage traffic during planned and emergency road closures or obstructions. There is also a need for better real time information for drivers, perhaps linked to Sat Navs, about congestion / disruption and planned closures and road works.

2.30 More efficient use could be made of existing road space, for example creating High Occupancy Vehicle lanes and allowing coaches, minibuses and perhaps HGVs to use bus lanes (while ensuring sufficient space and safety for cyclists).

2.31 As well as pedestrian countdown at signals, countdown for vehicles could also be introduced, to reduce red light running (perhaps combined with red light cameras) and increase throughput by preparing drivers for light changes (this is used in Ljubljana and other European cities).

2.32 There is a need for a thorough review of timings at all traffic signals to ensure they are giving the right balance of time to pedestrians / cyclists and motor vehicles, with greater use of more sophisticated signals that detect people / vehicles, especially buses and perhaps bicycles. Signals that stop / hold vehicles unnecessarily benefit no-one and cause delays to traffic, but it is important to provide adequate time for pedestrians to cross with minimal waiting time.

2.33 There needs to be more emphasis on, and funding for, road and infrastructure maintenance, as this has been neglected in recent years. Poorly maintained road surfaces put road users, particularly cyclists and motorcyclists, at risk, as well as causing discomfort, especially to cyclists, bus passengers and elderly / disabled car users. Poorly maintained signs also put road users at risk or cause confusion if they point the wrong way.

Accessibility

2.34 Para. 414 – in order to improve accessibility, as well as improving steps and stairs, opportunities should be taken wherever possible to install ramps, cycle gullies and luggage conveyor belts to assist those with mobility scooters, bikes, pushchairs/prams, shopping trolleys, heavy and bulky luggage and other wheeled items. It is important to acknowledge that improving accessibility not only benefits those with physical and sensory impairments but also the elderly and infirm, parents with young children and others with wheeled items. Therefore accessibility should be 'mainstreamed' and not seen as an 'add on'. Platform to train accessibility, both on the underground and national rail networks, remains a key problem that needs addressing, as it is of limited value improving access to station platforms if people cannot then get on the train. The needs of those with mental health issues and pregnant women also need to be taken into account in the design and management of the transport system.

2.35 There are concerns about abuse of the 'blue badge' scheme for disabled drivers, with many people who are not physically disabled using them, and often parking obstructively. Therefore there is a need for stricter monitoring and enforcement of the scheme.

Aviation

2.36 The strategy states that '*adequate airport capacity is critical to the continued competitiveness of London's economy...*'. However it is not clear whether there is a 'net economic benefit' from London's airports in view of the fact that, as well as bringing people into the UK, they enable UK residents to fly abroad for holidays and business with the resultant leakage from the UK economy. The strategy still seems to adhere to the 'predict and provide' approach for airport provision, an approach that has long since been abandoned for new roads. Instead, there should be a greater emphasis on demand management, reviewing the taxation regime for aviation (at a Government/ EU level), encouraging greater use of high speed rail for short haul domestic and European journeys, and making better use of UK's regional airports to reduce demand at London's airports.

2.37 Consideration should be given to further public transport access improvements to airports, including a review of airport rail fares, as there is often an excessive premium fare to airports that could deter use of rail services which have spare capacity e.g. the Heathrow and Gatwick Express services. Better information about public transport options to London's airports could also be provided by TfL on their website, and operating hours extended to cater for the 24-hour operation of airports and late flight arrivals / early departures.

Cycling

2.38 The council supports the increased role for cycling within the strategy, as getting more people cycling is a relatively easy and cost-effective way of meeting many of its goals. We welcome the reference in Para. 455 to Smarter Travel Sutton's achievement of an 85% increase in cycling trips in the first two years of its programme using behaviour

change campaigns, despite the high car ownership and hilly topography of parts of the borough. We hope to continue this trend through the 'Integrated Transport Package' approach which we are developing, focussing on each town / district centre in turn with a package of physical measures to encourage use of sustainable modes.

2.39 In many cases, cyclists can be helped by small scale targeted interventions, such as dropped kerbs, advanced stop lines and cycle lanes, cycle contra-flows and footway conversions, as well as parking restrictions. It is also important that cycling is considered in the design of all traffic and highway schemes, and in this regard Cycle Audits should be required for relevant schemes as in the last MTS. More cycle-friendly streets and public transport are important elements in facilitating an increase in cycling. While it is important that all roads (except motorways) are safe and convenient for cyclists, some signposted cycle routes using quieter roads are useful, and in this regard it is disappointing that there doesn't appear to be any mention in the strategy of the London Cycle Network (+) given its strategic and well-established role in facilitating cycling across the whole of London in a joined up way. The role of Sustrans in developing Greenways and other longer-distance routes, such as the Wandle Trail, should also be acknowledged and supported.

2.40 We support the principle of the Cycle Superhighways subject to them being of a sufficiently high quality to really make a difference to cyclists' journeys. As they will not come out as far as Sutton we would welcome funding and support to develop 'feeder routes' into the Superhighways, particularly the one that will start at South Wimbledon.

2.41 Para. 464 says that people are put off cycling because they consider it a 'sporty' activity that requires special equipment, but a recent TfL poster reinforced this view with its image of four male racing cyclists in lycra and helmets with the caption "*they wear the right gear, make sure you do*". It is important to send out the right messages.

Walking

2.42 There is considerable emphasis on cycling in the strategy, but perhaps not enough on walking, which is after all 'the glue that binds the transport system together' and is used in its own right for a significant proportion of shorter journeys. The walking environment in many parts of London leaves something to be desired and needs improving. This is especially the case around most of the major London terminal stations, and in central London generally, but also in the suburbs and at key interchange stations. The 'Better Streets' agenda and removal of guardrail and street clutter should help, along with the provision of more direct routes and crossings. It is important that the 'smoothing the traffic' agenda does not put motor traffic first and result in longer journey times and routes for pedestrians. Pedestrians are very important to the local economy as they support smaller local shops and businesses.

2.43 More serious consideration should be given to removing traffic from certain streets and areas where pedestrians are present in large numbers, and where pedestrianisation would enhance their experience and support the local economy. Examples include Oxford Street and parts of Soho. London lags well behind other 'world cities', and particularly European cities, in having few 'pedestrianised' areas or streets. In support of this, the 'World Squares for All' project should be revived in order to make iconic squares such as Parliament Square and Piccadilly Circus more pedestrian-friendly.

Road Safety

2.44 The council supports the approach to road safety engineering which gives top priority to making routes safer for pedestrians and cyclists, while still addressing the needs of car

occupants (in line with the 'modal hierarchy' that seems to have been dropped from the new strategy). There is scope for the Mayor to give a clearer lead to boroughs on this, to hasten the move away from traditional road safety engineering measures such as road humps and guard railing. Perhaps some more detailed guidance could be issued on new and innovative approaches to road safety engineering / traffic calming and shared space / streetscape improvements.

2.45 The strategy could also give more of a lead on 20mph zones, as their implementation is currently piecemeal and inconsistent. Some boroughs are considering introducing 'blanket' 20mph zones in residential streets, and it would help to have consistency across London. The Government has recently hinted at a change in the rules to make 20mph zones easier to install without the need for physical measures.

2.46 Para. 523 should also mention driving while using a hand held mobile phone, which remains a widely flouted traffic law that puts vulnerable road users at risk. There should be more emphasis on traffic policing and enforcement, instead of relying on physical measures and cameras, although the latter are useful. More innovative measures could be used such as traffic signals that change to red if someone is speeding or jumps the previous ones.

2.47 Improved street lighting is important on roads, foot and cycle paths, in parks and commons and especially routes around stations and town centres, together with better maintenance. Cutting back overgrowing vegetation around street lights is also important.

Better Streets

2.48 The council fully supports the shared space concept and is pleased to see the Mayor's commitment to this in the strategy. Shared space is vital to ensure the whole community can use the streets and we move away from a car dominated city. The question is how we can make this happen given modest budgets London-wide - £26m from Area Based Schemes.

Noise

2.49 This is an issue that concerns many people, and Sutton is affected to some extent by aircraft noise as it is on the stacking route into Heathrow as well as the take off circling route east from Gatwick. It is also suffering increasing numbers of helicopter flights heading in and out of London and this is something that also needs addressing. Vehicle noise remains the main issue, however, and there may be scope for further restrictions on vehicle movement and vehicle noise standards (especially motorbikes, but also cars and car stereos), as well as emergency vehicle siren use. Enforcing speed limits and discouraging aggressive driving can help reduce vehicle noise.

Air Quality

2.50 There could be greater enforcement against buses and coaches leaving their engines running on the stand or while parked, and greater encouragement for other drivers to turn their engines off while stopped at level crossings, in traffic jams etc. TOCs could be encouraged to do the same with diesel trains at London rail termini.

2.51 Para. 5.20.3 – there could be greater encouragement for the use of electric and other zero and low emission vehicles for small local freight deliveries, such as the service provided by electric cargo-bike in Sutton by EcoLocal. The issue of how electricity is generated, and battery disposal, needs factoring in to any encouragement of electric vehicles, which we support in principle. There is scope to reduce energy consumption in

transport infrastructure such as car parks and stations by, for example, turning lights off at night when they are closed, and introducing movement sensors on escalators so they only move when someone is on them.

Smarter Travel

2.52 Sutton has recently completed its £5m three year Smarter Travel Sutton project in partnership with TfL, and while the Smarter Travel section of the Strategy makes reference to the next smarter travel borough of Richmond, we would appreciate greater reference to the success and achievements of our project. Many cities and boroughs are learning from the STS experience and much more needs to be done to ensure the scheme deliverables, outcomes and lessons are embedded in strategic transport thinking for the Capital. In particular, basic principles of understanding the barriers to travelling by bicycle could be spelt out and measures to overcome them invested in, such as promotion, cycle purchasing schemes, cycle parking, cycle confidence training and cycle security.

Fares and Ticketing

2.53 There is a case for a review of the concessionary travel scheme in view of its financial burden on boroughs, and the blanket application of free travel to large sectors of the population irrespective of means.

2.54 Consideration should be given to permitting transfer between buses / trams within one-hour on a single fare to remove the penalty incurred from transfers on journeys that require a change. With most passengers now using Oyster this should be possible using swipecard technology. There could also be a case for re-introducing a reduced rate three and five-day off-peak travelcard aimed at tourists and leisure travellers who do not have Oyster cards, and to encourage off-peak travel by more flexible commuters. TOCs should be encouraged to remove the recent Network Card restrictions on weekdays to encourage more weekday off-peak travel when there is often considerable spare capacity, or reduce all off peak fares to that level.

Powered Two-Wheelers

2.55 Para. 5.24.3 should give greater recognition to the role of powered two wheelers in reducing congestion and pollution in London and give more of a lead to boroughs in providing for their needs, especially in terms of motorcycle parking and use of bus lanes, together with road safety awareness and rider-training. The use of electric motorcycles and bicycles could also be encouraged alongside cars, as there is a considerable range on the market.

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