

Appendix 2: Detailed Comments on the *Mayor's Transport Strategy: Public Draft , October 2009*

POLICIES AND PROPOSALS IN THE TRANSPORT STRATEGY (MTS)	BEXLEY'S RESPONSE
<p>Chapter 1 Introduction</p> <p>Para 3: Format of the document</p> <p>Para 12: Consideration of the findings of the Outer London Commission</p> <p>Para 18: Integration with the London Plan</p> <p>Chapter 2 Mayor's Vision</p> <p>Sections 2.1: The Mayor's vision for London</p> <p>Section 2.2 : The vision for transport</p> <p>Para 33</p> <p>Para 35</p>	<p>This is welcomed. However, contrary to general expectation that unlike the previous Mayor's transport strategy, MTS2 would be more high level and less prescriptive, in terms of the format and contents, it runs into 352 pages and is hardly a 'short and sharp strategic document'.</p> <p>Whilst the draft Strategy has considered the interim findings of the Outer London Commission, it will be important that the Final Strategy reflects the full recommendations of the Commission that are yet to be published.</p> <p>The Mayor's intention to ensure the integration of the Transport Strategy with his other relevant strategies, in particular, the London Plan, is welcomed. However, it is not clear if the Draft Strategy has taken into consideration the ongoing revision of the London Plan. The MTS must show explicitly how it will provide the transport infrastructure necessary to deliver the Mayor's spatial and economic development strategies.</p> <p>The six objectives of the London Plan set out in Section 2.1 are understandably wide-ranging and visionary and the MTS particularly intended to address one of these objectives that relate to accessibility and efficient transport system . However , it has been recognised that the MTS also seeks to respond to all of the London Plan objectives as well as the national transport policy objectives. This is certainly welcomed.</p> <p>Whilst we welcome the aim for a mode shift to walking, cycling and public transport, We would suggest a more realistic and progressive approach on the improvement of infrastructure, training and safety for cycling, in conjunction with walking.</p>

Para 43	A stated goal of the transport strategy to ‘support economic development and population growth’ is welcomed. However, the proposals listed to meet ‘the needs of a larger London in 2031’ should not be seen to be exhaustive. In our view, there should be another bullet point indicating the recognition of the need for further transport infrastructure improvements, particularly in the outer London boroughs, to support economic growth.
Figure 2: Proposed Outcomes	We welcome the Mayor’s intention to consider network improvements ‘whether funded or not’. However, we’re concerned that Figure 3 does not include further public transport improvements in the Thames Gateway borough like Bexley, apart from Crossrail.
Chapter 3: Context	A ‘challenge’ for the goal entitled ‘Improve transport opportunities for all Londoners’ is rightly described as ‘supporting regeneration and tackling deprivation’. However, the stated outcome needs to be more specific and should perhaps read ‘supporting wider regeneration outcomes by the provision of necessary transport infrastructure and services ’.
Section 3.1: London’s transport geography	
Para 65	We certainly agree that a coordinated approach is required to ensure London’s transport network functions effectively at a number of levels: international, regional, sub-regional and local. However, this should be applicable to both inner London and outer London areas and so the MTS is expected to recognise the need to overcome existing gaps.
	It has been correctly recognised that orbital transport corridors are also important to overall levels of connectivity, but in Outer London they are less developed compared to Inner London. MTS2 will, therefore, be expected to rectify this anomaly.
Para 74	Whilst recognising the exceptionally high rate of projected growth of the East London sub-region’s population, very little reference has been made to the travel patterns and transport implications with regard to this sub-region.
Section 3.2: Integrating transport and land use planning	The stated intention to improve the integration of transport and land use planning is welcomed.

Para 96	As in the previous Transport Strategy, the importance of the car as a mode of transport in Outer London has been recognised in this Draft Strategy. As an outer London borough, with inadequate public transport facilities, we welcome this approach.
Para 104 to 106	The Mayor's stated determination to 'improve the provision of public transport while also placing more emphasis on the economic development of Outer London' is strongly welcomed. However, paragraph 105 indicates the Mayor's reluctance to translates this into action, one reason being cited as the Outer London boroughs' desire to keep the 'suburban character' of their areas. This is followed by quoting the Outer London Commission's interim conclusions to make the Outer London town centres 'the focus of transport investment'. It has also been recognised that growth potential in the Thames Gateway 'will need to be supported by transport investments'. It is, therefore, expected that MTS2 will include measures (outside the current Business Plan) to provide such transport investments.
Chapter 4: Challenges and strategic policies	The 26 strategic policies listed in this chapter to meet the six goals of MTS2 described in Chapter2 do not make any reference to the specific policies described in Chapter 5, leaving them ostensibly mode-based.
4.2.2.5 and 4.2.2.7	The text in these sections imply that the requirements for capacity and connectivity improvements will be limited to metropolitan town centres. It is essential that these improvements are also provided for major town centres and other important centres of retail or employment activity. Although the analysis in sub-section 4.2.2.7 recognises the importance of 115 other major and district town centres, Policy 8 merely focuses on the need fro transport improvements within the metropolitan town centres only. This is inconsistent. Also, most of the proposals that this policy refers to, have no direct relevance to the transport infrastructure requirements of major (non-metropolitan) town centres. In this regard, there does not seem to be a joined-up approach in line with the Policy 2.3.1 of the draft replacement London Plan.
Chapter 5: Transport Proposals	A total of 129 proposals described in this chapter are mode-based and considerably detailed.

Para 265 and Proposal 6: Crossrail extension	. Whilst we welcome a reference to future extensions of Crossrail, we would like a more specific recognition of the need for the extension to Gravesend via Ebbsfleet to support regeneration.
Para 288: Docklands Light Railway	Although the Strategy recognises the need to investigate the feasibility of further capacity and network expansion of DLR, Proposal 15 omits the potential of extension to other areas such as Thamesmead.
Para 291: Tramlink	The potential for further tram schemes (in addition to the possible extension of Tramlink) seems to have been left out of consideration in the Strategy. Trams have a significant role in providing sustainable rapid transit links at appropriate locations, including the regeneration area of Bexley.
Section 5.3.7 Further extensions to the Underground network	. We welcome the Mayor's recognition of the opportunities for further enhancements and extensions to the LU network and some potential schemes. However, we strongly believe that a reference to the complete exclusion of some Outer London boroughs, such as Bexley, from the LU network and the potential for overcoming this situation in the long run should be mentioned. Accordingly, Proposal 22 will require suitable amendment.
5.8 River Crossings	
Proposal 39	We welcome the Mayor's intention to progress a package of river crossings in east London, in consultation with the relevant London boroughs. However, we're concerned that this includes consideration for a longer-term fixed link at Gallions Reach. This borough is opposed to any such fixed link crossing at this location.
5.9.1 Enhancing physical accessibility of the transport system	This is very much welcomed. We hope TfL will seek the views of boroughs about particular local requirements to be considered.
5.9.2 Enhancing information system	This is welcomed.
Para 442: Airtrack	We support the principle of Airtrack and believe that its full potential needs careful consideration.

Section 5.12 Cycling Revolution	<p>We do support the Mayor's priority to 'encourage more people to cycle'. We also believe in the usefulness of behavioural change in the choice of travel modes. Bexley supports the need for more and better cycle parking facilities and the possible use of cycle hire scheme at Outer London town centres. We're not sure, however, if this will be as 'revolutionary' a move in outer London as the Mayor seems to envisage. The necessary parameters for a dramatic modal shift to cycling in Outer London are significantly different than in central and Inner London. As recognised in para 456, there is a fundamental need for the improvement of necessary infrastructure to facilitate safe cycling, something that is difficult to achieve in Outer London. In our view, therefore, an exceptionally high level of expectation about the potential of cycling throughout London is likely to be somewhat misleading. There could be reasons for concern that over-emphasis on schemes such as cycle superhighways or cycle hire scheme may detract from more substantive solutions to London's transport needs. A progressive approach on the improvement of infrastructure, training and safety for cycling, in conjunction with walking would be more realistic. In particular, safety of cyclists is of paramount importance to encourage the use of this mode of transport both for commuting and leisure.</p>
5.13 Making walking count	<p>We welcome the Mayor's proposal to deliver 'significant investment to improve walking conditions across London', including high street revitalisation through good quality public realm.</p> <p>The proposals to reduce crime, anti social behaviour and make all journeys safer are welcomed.</p>
5.16 Reducing crime	<p>We strongly support the proposals for improving London's street spaces and agree that 'better streets' must be sensitive to location and context and be consulted on. It is hoped that adequate funding will be made available to boroughs to implement such proposals.</p> <p>We believe the potential for Greenways to combine safe cycling and walking routes should be fully utilised.</p>
5.17 Better Streets	
5.18.4: Proposal 89	
5.22.1: Proposal 114	<p>We note with interest that this proposal includes an intention to develop town centre journey planning tools. We hope this will be followed up by discussions with boroughs to identify particular needs.</p>

5.22.3: Freight	<p>We welcome Proposal 118 to introduce the concept of consolidation centres to facilitate the use of more environmentally friendly vehicles for servicing urban centres(para 680). This procedure was considered in Britain in the past and has been successfully in use in mainland Europe for quite some time. However local environmental factors need careful consideration.</p>
5.23 Fares and ticketing	<p>We note with interest the Mayor's intention to maintain the affordability of public transport 'to the maximum possible extent' . However, we are concerned that this principle is not reflected in recent increases in the fares of London's public transport system, making London one of the most expensive cities in Europe to travel by public transport. Policy 31 includes the Mayor's intention to 'ensure that fares provide an appropriate and necessary level of financial contribution towards the cost of providing public transport services'. This could prove contradictory to the principle of affordability.</p>
5.24 Parking and loading	<p>However, although flexibility in setting local parking standards for offices is welcomed, this should be extended through Development Plan Documents to other land uses if required by local circumstances.' after '... permissible parking standards. We welcome the Mayor's recognition of the 'essential role' of parking and provision for loading in supporting economic development, particularly in Outer London (para 693). Some Outer London boroughs that share borders with local authority areas outside Greater London have consistently faced the problems associated with different levels of permissible parking standards.</p>
5.25.6 Wider application of road user charging	<p>We note the Mayor's intention to 'continue to examine charging schemes covering Inner, and potentially Outer London' (para 727). However, as recognised in para 708 of the strategy, this is 'clearly a contentious policy' that cannot be applied at a level playing field in all parts of London.</p>
Chapter 6 Expected Outcomes	
6.1 Analytical Approach	<p>It is noted that a considerable amount of analytical work underpins the new MTS, particularly efforts towards better integration of land use and transport planning (para 734). This is certainly welcomed and it is hoped that this information will be shared with boroughs.</p>
6.2 Anticipated outputs and outcomes	<p>Although the analysis for the MTS focused on the outcomes of the committed investment</p>

<p>Chapter 7 Implementation Plan</p>	<p>programme until 2020, as indicated in TfL Business Plan and the HLOS (High Level Output Statement) process, the Mayor has rightly recognised that ‘these investments will not be sufficient to meet London’s needs and the Mayor’s desired outcomes for 2031’ (para 738). This has been reiterated in Chapter 8 , para 764 and 767. In our view, this is a key issue and the needs and aspiration of Outer London boroughs like Bexley for long-term major transport infrastructure improvements, not yet identified in the MTS, must be seen in this context.</p>
<p>Policy 27</p>	<p>Figure 80 on the Transport Strategy implementation plan includes a considerable number of unfunded schemes phased for the post 2020 period. It is, therefore, appropriate that there the Final MTS should consider including further unfunded schemes for the long term (2021 to 2031) if any borough can demonstrate the validity of such a proposition.</p>
<p>Policy 28</p>	<p>The spirit of this policy is certainly welcomed. However, we would like to see more tangible commitments for implementing the policy.</p>
<p>Chapter 8 Cost, resources and funding the strategy</p>	<p>We welcome the development of sub-regional plans, but are concerned that the timing for the publication of these plans are not commensurate with the preparation of borough’s new LIPs which must take the sub-regional plans into consideration.</p>
<p>Policy 30</p>	
<p>Policy 31</p>	<p>This is welcomed.</p>
<p>Policy 32</p>	<p>See comments under Para 5.23 above.</p> <p>The principle of rationalising the current level of bus subsidy itself should not be considered with alarm and should not necessarily be leading to the quality and levels of bus service. Boroughs like Bexley that do not have underground services are disproportionately dependent on the bus network for public transport journeys. The level of subsidy is relatively small compared to the support given to rail based services that are concentrated in Inner and Central London. The efficiency and affordability of the public transport system as a whole is a matter of consideration.</p>

