

## **London Councils' response to the Mayor's Transport Strategy – Statement of Intent**

### **Introduction**

London Councils welcomes this opportunity to provide our views and comments on the proposals set out in the Mayor's Transport Strategy – Statement of Intent. We have been undertaking work over the last 18 months in preparation for the revised Mayor's Transport Strategy (MTS).

In our response to 'Way to Go' in January 2009 we highlighted a set of key objectives and recommendations for the new Mayor's Transport Strategy which were adopted as London Councils' policy in June 2008. In preparing our response to this consultation we have considered how well these objectives and recommendations are addressed in the Statement of Intent (Sol) and much of our response is focused on those issues which we feel have not been fully addressed in the latest document. We have chosen not to answer the consultation questions explicitly as we feel it is more important to highlight the issues that need to be addressed in the revised Strategy and we look forward to continuing to work closely with TfL and the GLA as work on the new Transport Strategy develops to ensure that these issues are taken into account.

We have set out below those areas where we feel that further work is particularly needed.

### ***Integration with other policy areas and with strategies outside London***

As the MTS is being developed in parallel with the London Plan and the Economic Development Strategy, there should be better links to policies in these areas but it is still not clear how the MTS takes account of changes in health, education and business policy which affect travel patterns. It is also not clear how it will link to relevant strategies outside London.

### ***The needs of local vs. long distance travel***

Transport services and infrastructure improvements which provide for long distance commuting do not always meet the needs of London's residents and businesses. London Councils believes that local transport services should be prioritised and the MTS needs to set out how this will be achieved. Major strategic transport projects in London should be controlled by TfL given their over-arching strategic responsibility for transport in London.

Whilst the emphasis on bringing and maintaining all assets to a good state of repair is welcomed, the Mayor needs to clarify how he is going to ensure that funding for ongoing maintenance and local initiatives will be prioritised over larger high profile schemes. This is particularly important in the light of the Mayor's recent decision to cut the maintenance budget for the TLRN. It is essential that sufficient funds are allocated to allow maintenance to be undertaken either by TfL and/or boroughs, as this is an issue which has been neglected in recent years and much of London's transport infrastructure is in a poor state of repair. This includes not only road surfaces, but also signs and street furniture, footways and cycle routes and is particularly important given that in a few years time the eyes of the world will be on London when the 2012 Olympic and Paralympic Games take place.

### ***Clarity about what is achievable and deliverable within the timescale of the MTS***

Other than reiterating that one of the guiding principles will be 'Delivering value for money' the Sol provides very little information on individual schemes. As it is intended to be a high level document which provides a framework for developing the new strategy it might not necessarily be expected to include details on individual schemes but the final draft of the strategy should set out clearly which schemes are funded and which are in development stages. It should also ensure, where possible, that new proposals are achievable and deliverable within the timescale of the strategy and the best estimates of the likely funds available while recognising that some major projects will inevitably extend beyond the planning period of the Strategy. Alternatively, if the detail is to be worked through in the London Regional Transport Plans, then the MTS needs to be explicit about this, the LIP process timescale also needs to be reset to allow boroughs to take into account the content of the regional plans.

The Mayor has taken the decision to remove major transport proposals from the TfL Business Plan due to lack of funding, many of which have been identified as essential to support planned growth. As we stated in our response to 'A New Plan for London' it is important to start work on identifying the major schemes and other investment that will be necessary to support this growth and to secure the necessary funding to deliver these improvements in order to ensure that transport and development are joined up. To address this, London Councils believes that the Transport Strategy should indicate the priority the Mayor assigns to future transport projects in lobbying government for funding. The projects that London Councils believes are a particular priority are Crossrail 2 (the Chelsea-Hackney line) and a new Thames crossing.

### ***Encouraging modal shift***

The Mayor's emphasis on enhancing streetscapes and improving the urban realm is to be welcomed. However, the proposed policies relating to this do not place sufficient emphasis on the need to prioritise improvements of this type which encourage local journeys to be made on foot or by bicycle and ensure that people are provided with alternatives to the car for all their local journeys. Similarly, the safety and security related proposals make no mention of prioritising measures which support an increase in walking and cycling, something which is particularly important from a road safety perspective if an increase in these modes is to be encouraged without an increase in casualty levels. We would like to see a thorough review of the approach to 'road safety' and 'traffic calming' schemes, in view of the diminishing returns in terms of casualty rates, so that they are also evaluated in terms of their contribution to sustainable transport and environmental objectives. The contribution that such measures make to crime reduction should also be considered as greater numbers of people walking and cycling will deter crime and increase people's perceptions of personal safety.

In addition, whilst recognising that car use will still be necessary for some journeys London Councils would like to see recognition of the central role that transport can play in creating sustainable communities by ensuring that non-car based transport is provided or planned for from the outset in all new developments.

Whilst the Sol sets out a number of measures to support walking and cycling, the Mayor makes it clear that he does not support a hierarchy of transport modes. London Councils believes the transport strategy should encourage people to make smarter travel choices following a sustainable hierarchy of transport modes: putting walking above cycling, cycling above public transport and public transport above the private car. This should include an increased focus on both walking and cycling. There is no reference to a London Walking Plan which London Councils has argued should be a key priority nor is there any specific reference to infrastructure improvements that will be required in more prosperous areas with poor provision to encourage modal shift. To ensure that best use is made of existing road infrastructure, there should be a programme aimed at eliminating congestion 'pinch points' in the network. This would also contribute to the 'smoothing of traffic flow'.

Whilst there has been significant investment in cycling in London in recent years there is still considerable potential to increase cycling rates further, particularly in Outer London. To date many of the proposals for encouraging cycling, such as cycle highways and cycle hire schemes have focused on Central and Inner London boroughs and there is scope to develop such measures in Outer London too.

London Councils is supportive of car clubs which can have a key role to play in encouraging modal shift. We would like to see a greater role for them in the Strategy. At present they are only mentioned in terms of measures to encourage greater use of cleaner vehicles.

### ***Encouraging polycentric development***

London Councils supports the greater emphasis on developing Outer London and believes that the MTS should support transport which recognises and values the needs of Outer London and encourages polycentric development around existing town centres across London. We do not support a focus on a few 'strategic Outer London development centres' as this could be to the detriment of

other town centres. It is also important that the focus on Outer London is not at the expense of Inner or Central London.

The issue of whether and how to support development in Outer London is discussed in some detail in the Sol but key decisions on this issue will depend on the recommendations of the Outer London Commission (OLC) which is due to report in July. London Councils would like to work with the GLA and TfL to ensure that the transport implications of the OLC's recommendations are fully considered for the whole of London. We would also urge TfL to continue to examine alternative scenarios for Outer London and not to regard strategic Outer London development centres as a given as the wording in question 4a of the consultation implies. In addition to strengthening economic areas across London encouraging polycentric development (in a larger number of centres) would also reduce the need to travel.

Decision on investment in transport infrastructure should reflect the parts of London where significant population and employment increases will take place. Additionally, investment in transport will also be required elsewhere to encourage modal shift and to address areas of transport deficit, and areas of social deprivation more generally.

There is a need for improved orbital public transport links in Outer London and the importance of connections to centres just beyond the London boundary should also be taken into account. Where it is not possible to provide rail links, improved high quality bus links should be provided, including limited stop 'express buses'.

### ***Reviewing bus route planning***

The existing proposals to improve the operation of the bus network focusing on improving the value, frequency, comprehensiveness, simplicity and reliability of bus services are welcomed. However, London Councils believes the strategy should include a more extensive review of bus route planning to ensure that it meets the needs of Londoners and visitors to London in the 21<sup>st</sup> century by making the system more logical and easier to understand and use. The review should focus on how the bus network operates strategically rather than on a route by route basis or focusing on the contractual arrangements. The review also needs to look at the types of vehicle used, and whether there is scope to use smaller vehicles on quieter routes or at quieter times of day and at ticketing flexibility, including learning from good practice on this issue elsewhere.

London Councils and the boroughs would like to be involved in the development and implementation of this review to ensure that borough desires for improved orbital links are addressed and that other measures to fill gaps in the network are also incorporated. We are pleased to note that options around securing greater local influence and management of bus routes are being developed as part of the work on the City Charter. Recognition should also be given to the role that reviewing the bus network could play in smoothing traffic flows.

Where possible in residential areas, smaller less intrusive buses should be considered as the use of large buses, even single deck ones, invariably leads to opposition from residents. Smaller buses may also be more environmentally efficient. Shorter routes should also be considered to help improve reliability.

### ***Future developments on road pricing***

The Sol reiterates the Mayor's support to the ongoing operation of the central London Congestion Charging Scheme (CCS) and the removal of the Western Extension Zone (WEZ) but does not set out clear aims for congestion charging as London Councils has called for. The Mayor indicates that other forms of road pricing may be considered in the future but does not provide a framework and a clear process for boroughs, who wish to, to work with TfL to develop road pricing schemes. It is essential that any future proposals for additional road pricing in London are developed in full engagement with the boroughs. London Councils believes that individual boroughs should be free to propose a local charging scheme for all or part of their borough if they wish to do so. However, such proposals are

likely to have economic and transport implications which extend well beyond the boundaries of that borough. The Strategy should therefore set out the safeguards which the Mayor considers should apply to any consultation process on a proposal of this kind.

Road pricing should only be considered as a travel demand management measure where there are safe, convenient and affordable public transport, walking and cycling facilities available as an alternative. London Councils would also like to see a commitment to reviewing the CCS's existing payment collection methods to ensure the scheme is not heavily geared to securing revenue from fines, or making it unnecessarily difficult to pay.

### ***Addressing the impacts of climate change***

More robust systems are needed to deal with the impact of 'extreme' weather events such as snow, flooding and heat on the transport system and we welcome the Mayor's proposals to adapt for climate change. We also welcome the measures aimed at reducing CO<sub>2</sub> emissions and would particularly support initiatives to encourage more fuel efficient driving techniques, as well as those aimed at influencing people's choice of mode and vehicle.

We need to have greater clarity from the Mayor on the criteria and timescales he will use to determine that his current policy approach to achieving reductions in CO<sub>2</sub> is, or is not, working. At what point would the Mayor accept that more direct intervention would be required to reduce emissions in the Capital? Also, given that London is already failing to meet legal targets on air quality, urgent clarification is needed from the Mayor to outline what steps he is willing to take now to bring about significant change.

We support the Mayor's proposals to encourage electric vehicle use in principle but would like to work with the Mayor to ensure that these are implemented in such a way that they do not add to parking pressures and congestion and do not detract from measures to encourage walking and cycling. We also believe that greater attention needs to be given to reducing emissions in the generation of electricity. We would not wish to see funding for initiatives to promote electric vehicle use reduce the funding available for other measures to promote modal shift away from private vehicles such as public transport improvements, smarter travel initiatives and investment in walking and cycling. The need to work with boroughs on the promotion of electric vehicles should be reflected in the MTS.

### ***Transport opportunities for all***

London Councils believes the needs of people with disabilities must be taken into account fully in the Strategy and that all new schemes should be fully accessible. However, we feel there is room to consider greater flexibility in the standards relating to accessibility so, for example, if there is not space for a standard gradient ramp in a particular location then a sub-standard one is considered as better than no provision. It would also be useful to encourage greater use of luggage and cycle ramps, including at stations.

There is a need to prioritise step free access at major interchanges on both the underground and rail network. The Strategy should give greater consideration generally to improving the accessibility of public transport, particularly given that London will be host to the Paralympic Games in 2012.

Greater consideration needs to be given to the affordability of public transport in order to ensure that there truly are transport opportunities for all.

### ***Integration between modes***

Improved interchange both between modes and within modes would improve the transport experience in London. We welcome the Mayor's proposals to enhance interchange and integration of the transport system. However, there needs to be recognition of the dependency of South London on heavy rail due to the limited underground network south of the river and the Strategy should include measures for integrating the rail network into the rest of London's transport system, ideally by gaining greater control for the Mayor over all rail lines in London along the lines of the London Overground. There is also a

need for better fares integration and a common fares policy so that those who use rail lines do not have to pay higher fares than those making equivalent journeys by underground.

In conclusion, London Councils looks forward to working with TfL and the GLA over the coming months to ensure that the issues we have highlighted here are addressed in the revised Mayor's Transport Strategy. If you would like further information about any aspect of this response, please contact Ruth Bradshaw, Head of Infrastructure Policy (tel: 020 7934 9909; email: [ruth.bradshaw@londoncouncils.gov.uk](mailto:ruth.bradshaw@londoncouncils.gov.uk)).