

► Draft Mayor's Transport Strategy

► London Councils response

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Introduction and key themes

1. London Councils represents London's 32 borough councils and the City of London. It is a cross party organisation that works on behalf of all its member authorities regardless of political persuasion.
2. The 32 London Boroughs and the City of London are the Mayor of London's and Transport for London's key delivery partners for the Mayor's Transport Strategy. Boroughs are responsible for 95 per cent of the highways network, as well as taking a keen interest in the rail, tube, tram and bus services provided to their residents, workers and visitors. This London Councils response sets out a series of issues we want to see reflected in the final Mayor's Transport Strategy.
3. The key themes of our response are:
 - i. We support the ambition and bold vision, particularly for Healthy Streets;
 - ii. We welcome the recognition that some of the proposals will be easier for some boroughs to deliver than others;
 - iii. We welcome the holistic approach taken in the MTS to matters of the environment, economy and health and particularly welcome the joint nature of the air quality proposals in both the draft MTS and draft London Environment Strategy;
 - iv. We have some concerns about road user charging and the perceived devolution of responsibility for the difficulty of introducing these to borough politicians rather than the Mayor;
 - v. We welcome the recognition that a single transport solution will not work everywhere. We suggest solutions need to take into account the local context, the purpose of the journey and the time;
 - vi. We consider that the draft MTS does not have a spatial central / inner / outer approach, which has surprised us since all the pre-consultation work TfL and the GLA did was focused on this geography;
 - vii. There are areas we think the Mayor could and should work faster on, for example in cleaning the transport fleet, demand-led bus services, rapid transit buses, tram extension and extending step-free access across the network;
 - viii. Funding and financing of schemes remains a concern, given the level of ambition in the strategy, particularly as Healthy Streets funding through the Liveable Neighbourhoods

fund is not going to stretch far. Funding and financing of schemes, small-scale and strategic, remains as challenging for boroughs as it is for TfL. We want to see continued collaborative working on this;

- ix. We support the major infrastructure plans for London and want London government to start identifying those for 2041-2060, given the challenges in bringing schemes forward. We note that a number of the proposals require central government support;
- x. Mode shift in outer London is recognised as being most challenging but we do not feel the proposals will address this adequately enough. These includes proposals relating to public transport provision, the cycle network and orbital rail;
- xi. We seek greater reference to congestion as an implication of the Mayor's policies in the final MTS;
- xii. We consider the draft MTS to lack vision and preparedness for technological changes affecting transport. Thinking particularly of dockless cycling and autonomous vehicles, the Mayor needs to develop the necessary frameworks to ensure these and future changes can support the MTS vision and outcomes;
- xiii. With regards to the Local Implementation Plan (LIP) Guidance, we are concerned at the level of prescription in the document, regardless of whether that was intended, and the requirement for boroughs to develop targets for a series of delivery indicators where the Mayor is not developing his own targets. We feel it remains appropriate for boroughs to set targets against the outcome measures alone, as they have done under LIP2. A more ambitious strategy does not necessitate more requirements on boroughs. We also have some suggestions on shortening the Guidance that we will raise in our separate response;
- xiv. We note that whilst the MTS is ambitious, the timescales remain short for boroughs to develop their Local Implementation Plan. We therefore ask for acknowledgment that boroughs will not be able to deliver substantial amounts of what is an ambitious strategy before the end of the Mayoral term.

Chapter 1 – The Challenge

London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.

Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.

4. The draft Mayor's Transport Strategy identifies that a dominance of motor vehicles is causing congestion, air pollution, road danger and contributing towards physical inactivity due to an overdependence on car usage. The public transport experience needs to improve, including accessibility and reliability and addressing the lack of viable public transport options in some parts of London. Planning for London's growth and using transport to support the delivery of enough new, affordable homes is the third challenge set out in the draft MTS.
5. London Councils welcomes the holistic nature of the draft MTS and the recognition that transport is a means to end, and has a role to play in supporting wider outcomes for London. We are concerned to see air pollution is not considered a challenge in itself, but acknowledge that the recently published draft London Environment Strategy does set out the Mayor's plans on this. Emissions relating to construction represent a significant percentage of London's emissions and London's growth will mean more homes with boilers emitting pollutants, and potentially more drivers. Restricting development to be car-free is not a solution if adequate public transport is not provided alongside it. Additionally, we feel that some potential solutions have not been given the focus they deserve, which we are outlining throughout this consultation response in more detail.
6. The draft MTS lacks a spatial focus that we expected given the efforts by TfL in the pre-consultation stages to engage with boroughs on this basis. Whilst the particular challenges facing outer London in terms of public transport provision are recognised, there is little else relating to spatial geography. The maps given in the New Homes and Jobs section of the draft MTS that are only for some parts of London are not a replacement for this. It would be helpful to see in the final MTS more examples of differential solutions that may work in different parts of London and recognition of the different spatial challenges in central, inner and outer London, for example for freight and servicing. The overall challenge for London is set out well, but not for the distinctive parts of it. We want to see greater recognition of sub-regional working in the final MTS, as this is well developed in some parts of London and there is a lot of ambition to work collaboratively on delivering parts of the MTS. London Councils would like to work with the Mayor and TfL to develop these solutions collaboratively before the final MTS is published.
7. Many of the proposals included in the draft MTS will require significant behaviour change on the part of all Londoners, not only those who move into new developments. We feel there is a lack of recognition that existing residents will have to change their behaviours too (for example, cycling instead of driving, or not having a second or third car). This will be challenging in parts of London where public transport provision is poor. To achieve this behaviour change, Londoners need to recognise the challenges first. We are concerned at the lack of discussion about the big themes of the MTS outside the transport industry. We want to see the Mayor using the release of the final MTS as an opportunity to stimulate debate and seek a mandate for the ambition and radical ideas in the MTS. We are concerned that boroughs already spend a lot of time explaining and defending schemes to residents and it would be helpful for the Mayor to also be leading this debate.
8. We are also concerned that whilst orbital links are referenced, there are no real solutions to introduce them, except the new Overground rail link in West London between Hounslow and

Cricklewood via Oak Old Common that was first proposed by the west London boroughs. We want to see more orbital links in the final MTS.

9. The issue of severance, where an area is divided by a railway line or road with limited or no crossings is only referenced twice in the draft MTS and in neither case in a way that relates to tackling it strategically. We want to see this explicitly referenced in the 'easy to cross' Healthy Streets Indicator and for the Mayor to champion addressing this, particularly across major highways.
10. Finally no reference is given to the potential impact of digital infrastructure in changing the way people work and where they work from. It would be helpful for the final MTS to demonstrate how much the modelling takes this into account. Encouraging local employment could also be referenced more strongly, and the need to provide good public transport to employment sites. More broadly, the final MTS needs to look forward and include how transport is evolving in order to start addressing 'mobility as a service'. Private hire vehicles and dockless cycle hire are already examples of how technology can be disruptive and challenge existing transport networks. These plus autonomous vehicles will soon create major shifts in travel behaviour and use of streets that needs to be managed.

Chapter 2 – The Vision

2) The Mayor's vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80 per cent of Londoners' trips will be made on foot, by cycle or using public transport.

To what extent do you support or oppose this proposed vision and its central aim?

11. London Councils welcomes and supports this vision, although we are realistic that delivering it on the ground will be challenging, given the constraints that exist in London. London boroughs are vital partners to achieving this, as the highway authority for 95 per cent of the road network, and we welcome the emphasis given in the draft MTS to the borough role. We want to see the delivery milestones between now and 2041 and understand how these apply to different boroughs or parts of London, to avoid this becoming a target that is left for the long-term. We want to know what TfL plans to do on the TLRN to promote walking, cycling and public transport use and how it will work with boroughs to achieve this.
12. Given the clear public health benefits of the draft MTS, we support the involvement of public health teams in the delivery of the strategy and believe this is vital to its success. Discussions held show that Association of Directors of Public Health strongly support the draft MTS and recognise the important role public health has in delivering the strategy in partnership with transport, planning and environment colleagues.
13. We would like to see public health better represented at a senior level within TfL. TfL should appoint a Director of Public Health and ensure it employs sufficient accredited public health professionals to oversee the delivery of Healthy Streets. We also suggest that the Healthy New Town initiative with NHS England may be a useful contributor to, and supporter of, the Mayor's Healthy Streets Indicators, where large-scale regeneration is planned.
14. We encourage the Mayor to review again the air quality targets and timescales for cleaning all types of motor vehicle set out in the draft MTS in light of the government's announcements in its Air Quality Plan. Given the scale of the air quality challenge in London, we encourage the Mayor to continue to accelerate ways to tackle the problem.

3) To support this vision, the strategy proposes to pursue the following further aims:

To what extent do you agree or disagree with the aims set out in this chapter?

- **by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day;**
- **for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041;**
- **for all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London's entire transport system to be zero emission by 2050;**
- **by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public;**
- **to open Crossrail 2 by 2033;**

- to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor;
- to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared with the full network;
- to apply the principles of good growth.

15. London Councils welcomes the ambition in the draft MTS. These aims are bold and help support an inclusive, dynamic and modern future London. We support the principle of all the aims set out above and we support Crossrail 2 as a much-needed major infrastructure project for London.
16. However, we want to see the Mayor and TfL go further and faster on a number of these. We believe 2037 is not soon enough for all buses to be zero emission. The technological advancements seen in recent years mean we think this target could be achieved sooner. In the same way we do not feel improvements to the accessibility of the transport system by 2041 is good enough, and we want to see TfL explore ways to secure funding from different sources to accelerate accessibility, especially to rail and tube stations.
17. We challenge the 80 per cent target for trips being made by walking, cycling and public transport. TfL's own data in the draft MTS, given on page 277, indicates that 90 per cent of trips in central London and 80 per cent of trips in inner London are already made by walking, cycling and public transport. In the same way, trips between central and inner London, central and outer, and central and outside London already meet these targets – and have done since 2015. The real areas of focus are trips within outer London, between inner and outer, and outer and inner London to outside London respectively. Investment in public transport is essential to achieving these targets. The 80 per cent target for Londoners' trips risks becoming misleading and obscures the dedicated work TfL and the boroughs need to do in these areas. We want to see headline targets for outer London trips, and for travel between inner and outer and outside London used, otherwise the Mayor can rightly be viewed as setting a target that's already been largely achieved.
18. In addition we would like to see evidence in the final MTS that the Mayor is engaging with Public Health England and the NHS in London to ensure the Mayor's transport ambitions are properly tied up with public health outcomes. We support efforts for every Londoner who can to do 20 minutes of active travel a day, where they are not already active. This messaging needs to acknowledge that the Chief Medical Officer has a target of 30 minutes of physical activity per day.¹ We suggest that the Mayor should be promoting the role of active travel within this target, rather than proposing a new target. Promoting active travel will involve behaviour change and we seek recognition of this in the final MTS. We suggest that TfL could look to include an option on its journey planner that people could use to pick a route that involved 20 minutes of active travel. As well as the benefit to physical health, being active has benefits for mental health too, which are only very briefly mentioned on page 43. We would like to see greater recognition of the benefits for positive mental wellbeing included in the final MTS.
19. Whilst we welcome the ambitions for the road safety Vision Zero we seek urgent clarity on what is expected from boroughs here and how this will be achieved. We particularly want to understand what will be done differently to achieve the end of bus deaths by 2030, especially given the expected increase in older and more vulnerable bus users and the increase in walking and cycling, which will increase the risk of conflict between buses and more vulnerable travellers. We also want to understand what Vision Zero means for streetscape; whether this means more segregation to

¹ The daily target is the suggested way to achieve the target of undertaking 150 minutes of physical activity per week.

eliminate the risk of conflict, or more shared space but with slower speeds. We are concerned about the focus on killed and seriously injured, and the absence of reference to people who are slightly injured. A broad safety message continues to be important.

20. Transport for London, on behalf of the GLA, has recently commissioned a congestion study to better understand the causes and composition of congestion in different parts of London. This should help define essential journeys and understand peak-time journeys better, particularly for freight, and what is being transported. The draft MTS lacks a focus on congestion beyond traffic reduction, although we note that borough funding through the Local Implementation Plan is still assessed using congestion as one indicator. Congestion is often a concern for residents. Population growth could mean more cars and boroughs need the support of the Mayor in the MTS if the Mayor considers that congestion could support people opting for public transport, walking or cycling.
21. Whilst we support better planning and consolidation of journeys and deliveries, this will require businesses to change customer perceptions about the speed of deliveries and provide incentives to wait longer. The Mayor needs to spearhead this by explaining why this is important and how delivery and shopping preferences have a citywide impact. Some companies have already started this, but more will be required if reducing peak-time delivery congestion can be achieved.
22. TfL needs to continue to work with boroughs, the freight industry and businesses to encourage more deliveries and collections to be carried out off-peak. Where time-critical peak journeys remain necessary, we want to work with the Mayor and TfL on a framework that addresses how to manage this. When changing the times of deliveries, increased noise nuisance and pollution should be no more acceptable than increases in air pollution. We need a step change in freight vehicle design to ensure fleets are quieter, safer and greener. Although immediate action is necessary, moving goal posts with changing policies and implementation dates have a significant impact on boroughs and businesses with small or large vehicle fleets. We will continue to work with TfL and boroughs to have a clearer, more coordinated approach to freight management and regulation. This work needs to give consideration to technological changes, such as droids, drones and 3D printing.

Chapter 3 – Healthy streets and healthy people

4) Policy 1 and proposals 1-8 set out the Mayor's draft plans for improving walking and cycling environments (see pages 46 to 58).

To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.

23. London Councils strongly supports Policy 1 and the Mayor's ambitions to make London a city where people choose to walk and cycle. We support Proposal 1 and in particular the strength of proposal 1E (ensuring any scheme being undertaken on London's streets for any reason improves conditions for walking and cycling). We feel the strength of this statement needs to be replicated in others in the draft MTS, which we highlight in our response. We want Proposal 1E expanded to include the roadworks and disruption that take place whilst a scheme is constructed.
24. We want to see the final MTS amended as follows:

Proposal 1e) Ensuring any scheme being undertaken on London's streets for any reason improves conditions for walking and cycling and adequate consideration is given to pedestrians and cyclists whilst the scheme is being constructed.
25. The affected London boroughs will respond directly on Proposal 2 (transformation of Oxford Street and Parliament Square). London Councils wants to see TfL working with boroughs to identify other locations for pedestrianisation or pedestrian and cycle priority in other town centres, including in outer London. Bus routes converging on town centres are important for users getting to where they need to go, but the impact on pedestrians, cyclists, air quality and streetscape needs to be considered. This is recognised in Oxford Street, and there will be other locations boroughs want to address with TfL. Where these are part of the TLRN, we expect the Mayor and TfL to be bold and ambitious in identifying options to divert traffic, as is happening for Oxford Street.
26. We welcome Proposal 3, a London-wide network of cycle routes and improved infrastructure, bringing 70 per cent of Londoners within 400 metres of a cycle route by 2041. We want the final MTS to define more clearly what is meant by 'cycle route' in this context, as improving conditions for cycling can be achieved by making local streets safe for cycling and reducing traffic, as well as through dedicated, segregated infrastructure. A different approach is likely to be needed in different parts of London, and in different parts of boroughs.
27. We are concerned that the 30 per cent of Londoners not within this distance of a cycle route will be in outer London; the very area that the Mayor has identified needs to be focused on in order to reduce the number of journeys taken by car. The text on page 28 also implies that cycling investment will focus on inner London as this is where it will be easiest to achieve targets. All of London needs investment in good cycle infrastructure and the proposed new cycle routes in Figure 4 reinforce the radial model of London's transport despite it being well-recognised that London lacks good orbital routes that offer an alternative to the car. We therefore want the final MTS to rethink this approach and give greater consideration for how the proposed indicative cycle network by 2041 can cover far more of outer London and introduce far more orbital routes. The Mayor cannot achieve his objectives for mode shift, especially for outer London, if the quickest way between two district centres is by car.
28. The LIP Guidance sets targets to reduce absolute car ownership and for boroughs to target reductions based on total cars owned and car ownership per household. Given population and households increases, we suggest a per capita approach may be more appropriate. London Councils supports Proposals 4 and 5 to encourage walking and wayfinding. We encourage TfL to

continue to work with the developer community on mapping and travel apps. We support Proposal 6 to increase use of the Santander Cycle Hire and support the recognition that alternative models of cycle hire will come to London. We note the arrival of dockless cycling in London, as an alternative way to bring cycle hire to boroughs where the Santander scheme will never be profitable for TfL to operate. The final MTS needs to set out how dockless cycling can be managed effectively, particularly in terms of the risks of obstruction and street clutter, and for the safe and confident movement of disabled, blind and partially sighted people. We are working with TfL and boroughs on this.

29. We support Proposal 7 on promoting walking and cycling. Proposal 8 encourages street closures on a one-off, trial and regular basis. We support this in principle as street closures can provide a safe play space, reduce traffic and can help tackle spikes in air pollution. We want to highlight that street closures require boroughs to assess the streets suitability and consider issues such as safety and displacement of traffic. Street closures should continue to be at the discretion of the borough and the final MTS needs to include greater reference to this. Boroughs will be particularly instrumental in lending support to Proposal 8 and we would like to see greater recognition of this.

Additional measures

30. Autonomous vehicles are discussed in the delivery section of the draft MTS. We feel insufficient consideration is given to the impact of autonomous vehicles on pedestrians, other road users, and encouraging walking and cycling. We acknowledge that TfL and the Mayor cannot predict the technological advancements that will come during the lifetime of this MTS; however for those that already exist we want to see the Mayor taking them into full consideration. We have outlined further comments on autonomous vehicles in our response to question 21 (page 32). In particular, the final MTS should clearly set out what benefits it wants autonomous vehicles to deliver and not deliver, and begin developing the necessary policy frameworks to ensure this is possible, as this technology aims to increase driving by making it easier and cheaper.
31. We know that boroughs find it frustrating to approach TfL with proposals for improving the street environment to be refused by TfL's network management who are concerned about the impacts on bus reliability. We expect TfL to support borough initiatives that are in line with the Healthy Streets approach and will deliver the aims of the MTS. Where boroughs experience these difficulties with TfL's approach, we will raise them with the Walking and Cycling Commissioner at regular quarterly meetings that are planned with members of London Councils' Transport and Environment Committee.

5) Policy 2 and proposals 9-11 set out the Mayor's draft plans to reduce road danger and improve personal safety and security (see pages 62 to 67).

To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security? Please also describe any other measures you think should be included.

32. London Councils supports the Mayor's ambitions for our streets to be safer and for road danger to be reduced. We welcome Vision Zero and the associated targets that by 2041 no person will be killed or seriously injured on London's roads. They are, however, highly ambitious targets; we think no fatalities may be achievable but no-one being seriously injured would require significant, as yet unknown, technological advances.
33. In addition we are concerned at the sole focus on numbers of people killed and seriously injured. There is no reference in the draft MTS to people slightly injured on roads, which has had a worryingly upward trend in the last couple of years, nor the impact this has on their confidence to

walk and cycle. The Mayor should use the final MTS to clarify that slight injuries should also decrease. He should also indicate what TfL will do on the TLRN to reduce these numbers; and what the Mayor expects boroughs to do.

34. Page 64 of the draft MTS sets out some broad ways to reduce the danger posed by motor vehicles. It would be helpful in the final MTS for TfL to set out its modelling assumptions for achieving Vision Zero and the associated targets. We want the Mayor to commit to introducing 20mph speeds on the TLRN where it runs through town centres and close to shops, schools and other community destinations where boroughs request this in the final MTS.
35. Not all of London's roads are suitable for 20mph speeds and already have speeds of 40mph or 50mph. We want to understand in the final MTS how the Mayor plans to reduce collisions on these roads as well, since 20mph speeds are not a feasible proposal.
36. Improving compliance, which is part of Proposal 9A will be crucial to the success of lower speed limits. We want to see the Mayor addressing this in the final MTS with a commitment by the Metropolitan Police Service to enforce all speed limits. If the Mayor opts not to direct his police force in this way, then London Councils wants to work with the Mayor and TfL to explore how powers to ensure compliance with road speeds could be devolved to boroughs in London. The Mayor could also work with car insurance companies on incentives for using 'black box' devices that monitor speed and road compliance. The timescales for the Bus Safety Standard (part of Proposal 9C) should also be set out in the final MTS.
37. We welcome the proposed direct vision standard (Proposal 9C) and will continue to work with TfL to deliver and consolidate it with existing regulation such as the London Lorry Control Scheme.
38. Proposal 10 says an annual progress report on reducing the number of people killed or injured will be provided by TfL and the police, which is not new. We want to ensure this includes people who are slightly injured. Boroughs need the flexibility to focus resources on a junction with high numbers of slight injuries, for example, rather than somewhere with very low numbers of people seriously injured, if the context suggests that is an appropriate response.
39. We therefore want the final MTS amended as follows:

Proposal 10: The Mayor, through TfL and the boroughs, will collaboratively set out a programme to achieve the Vision Zero aim of reducing the number of people killed or injured on London's streets to zero. A joint police/TfL report will provide annual updates on progress.
40. Proposal 11 sets out a comprehensive approach to improving motorcycle safety, although mopeds should also be included. Motorcyclists, as vulnerable road users, should be considered as part of the Healthy Streets approach. TfL's urban motorcycle design handbook (Proposal 11A) should align with Healthy Streets. We reject Proposal 11C which calls on all boroughs to allow motorcyclists to use bus lanes. TfL has not provided the evidence which demonstrates that motorcyclists are safer using bus lanes, and so we request this proposal's removal from the final MTS.
41. We recognise that Proposal 11 includes a number of voluntary measures to raise standards and training for motorcyclists. Alongside this, we want to see the Mayor work with the Department for Transport to review the standard, use and duration of the Compulsory Basic Training (CBT) licence. This is required to drive a powered two-wheel up to 125cc engine power. The licence can be gained within four hours, is valid for two years and can be reacquired multiple times. The licence training is insufficient for busy London streets. Licence types are not recorded in traffic accidents but riders of machines of under 125cc engine power accounted for 67.5 per cent of all powered two wheel accidents in 2015.

Additional measures

42. In the lifetime of this strategy there could be alternative means to managing speed; for example through in-car devices rather than external speed cameras. This is where autonomous technology has a clear benefit. Rather than focussing on fully autonomous vehicles, we should encourage development of technology that ensures compliance with essential regulations, such as speed limits.

6) Policy 3 and proposals 12-14 set out the Mayor's draft plans to ensure that crime and the fear of crime remain low on London's streets and transport system (see pages 68 to 69).

To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London's streets and transport system? Please also describe any other measures you think should be included.

43. London Councils supports Policy 3 and Proposals 12 and 13. We welcome commitment to specialist and integrated policing of London's transport system and the focus on moped theft given the rise in this type of crime.

44. We want to see Proposal 14 amended. Insufficient consideration is given to the changing nature of the threat to London's transport system; away from hubs like stations where people naturally congregate to areas of lower protection where random attacks can take place. Recently TfL and boroughs have started to discuss with MOPAC and government about how hostile vehicle mitigation can be introduced in London. This has the potential to run directly counter to the Healthy Streets approach, which includes decluttering places. However, since the terror threat is not expected to dissipate any time soon, the Mayor must consider how protecting public spaces forms part of his MTS and how it can be introduced in a way that contributes to the Healthy Streets approach as well as place.

45. We therefore want to see the final MTS amended as follows:

Proposal 14A: The Mayor, through TfL, and with the boroughs, will ~~seek to~~ work with Government, law enforcement and security agencies, transport providers and other relevant organisations to respond to, and counter, current and future terrorist threats to the London transport system.

Proposal 14B: The Mayor, working through TfL and with the boroughs, will determine how to introduce ways to protect public spaces, including through the use of hostile vehicle mitigation, in identified sites across London in a manner sensitive of place and in a way that supports the Healthy Streets approach.

Additional measures

46. The draft MTS does not reference bicycle theft. Recognising that people will not start to cycle if there is nowhere secure to lock their bike or their bike is stolen, boroughs will use their highways and planning powers through the LIP process to deliver secure bicycle storage. The Mayor should do the same on the TLRN and encourage businesses to part their part as well.

47. We want to see reference to tackling fare evasion, an increase in enforcement officers and seeking additional powers to tackle this. At a time when TfL's finances are under increasing pressure, staff at stations cannot continue to be powerless to stop fare evaders.

7) Policy 4 and proposals 15-17 set out the Mayor's draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).

To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets? Please also describe any other measures you think should be included.

48. London Councils welcomes the prioritisation of space-efficient modes of transport and we suggest this is strengthened with the inclusion of a definition of 'essential traffic'.

49. We propose the following definition be added to the final MTS:

Essential traffic is the most space-efficient and least polluting way to travel.

50. We note the lack of targets and indicators on congestion (as opposed to traffic) and note that while the proposals in the draft MTS may encourage mode shift and therefore fewer cars on the road, it doesn't follow that congestion itself will fall. The draft MTS has not made a strong case that providing segregated bus lanes, and new pedestrian crossings, for example, are part of the solution to congestion. As referenced above, we feel there is a role for the Mayor in discussing how people receive their shopping and deliveries and the impact this has on congestion.

51. We welcome the role of business identified in Proposal 15 and there is scope for commercial waste services provided by boroughs to support consolidation of business waste arrangements, especially given vehicles are already traversing the same roads to collect household waste. That said, many of London's Business Improvement Districts have already started work to consolidate deliveries and waste collection arrangements, and it would be helpful to include in the final MTS where the opportunities for this are.

52. We feel that planning for a strategic consolidation and distribution network is welcome and we expect to see site allocations for this in the London Plan. It will however be challenging to achieve, given the pressures on London's land. In the same way it would be helpful to know in the final MTS how much of London is already within a 30-minute drive of a construction consolidation centre, and how much of a challenge the delivery of this will be. This might be a useful addition to the infrastructure mapping tool established by GLA colleagues.

53. As well as safer and cleaner vehicles, a London lorry standard (Proposal 15G) should also consider noise and the nuisance this causes London's residents. As part of the recent review of the London Lorry Control Scheme, London Councils has agreed to explore noise standards for vehicles and we would welcome the Mayor's support with this.

54. We want to see the MTS amended as follows:

Proposal 15G: Developing a 'London lorry standard' to simplify the regulatory environment for HGVs operating in London and ensure that vehicles are safer, cleaner and quieter.

55. Boroughs have long-championed making better use of the River Thames for freight and we welcome Proposal 16 to move freight off roads and onto the rail network and River Thames. We want this to be done in such a way that protects rail paths for increasing service frequencies and introduce passenger services on lines that currently only have freight. We want to see in the final MTS what has been achieved so far. Use of waterways is not restricted to the River Thames; London has a canal and river network and this can provide opportunities for moving freight as well. To achieve this vision, the Mayor must safeguard and build more wharfs in collaboration with boroughs. Moving freight onto the rail and waterways network does not address emissions or ensure that the vehicles transporting it are clean. Our response to question 10 (paragraph 86) addresses the action we want to see taken here.

56. We want to see the final MTS amended as follows:

Proposal 16: The Mayor, through TfL will work with Network Rail, the Canal and River Trust and the Port of London Authority to move, ~~where practicable,~~ freight off London's streets on to the rail network, canal network and river Thames at net zero or improved air quality. The Mayor, working with boroughs, will use the London Plan process to identify and safeguard new wharfs to help achieve this.

57. We support Proposal 17 that proposes that car club provision should only be supported where it removes private parking spaces. Car club bays should be prioritised for 'green' vehicles. We are concerned at the lack of reference in the draft MTS to the different models of car clubs – floating, point to point as well as back to base. Given their different impacts on potential public transport usage, this needs to be better developed in the final MTS. We believe there is a role for each of the different models in London and these should be further developed to help people to give up their private car. Different approaches will work in different parts of London; a spatial approach of central, inner and outer London in the final MTS could help develop a successful strategy for car club approaches.

8) Proposals 18 and 19 set out the Mayor's proposed approach to road user charging (see pages 81 to 83).

To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.

58. London Councils principally supports road user charging where it can be done fairly with much borough involvement in the design and implementation and it is proven to support policy aims, such as reducing pollution, encouraging more walking and cycling or financing transport infrastructure and maintenance. Any new road user charges should be hypothecated to walking, cycling and public transport improvements so that residents can clearly see the benefits and charges avoid being seen as another way to raise revenue by councils.
59. London Councils would like to work with the Mayor and TfL to identify how road user charging could be developed to tackle congestion as well as improve air quality. Road user charging could be an effective way to tackle traffic congestion and fund road maintenance in certain contexts. Research from organisations such as the OECD, Friends of the Earth and Deloitte, shows that road pricing can help to reduce congestion when planned correctly. TfL and DfT need to explore the potential technologies that could assist with more intelligent road pricing systems. While there is some fairness in charging more according to distance travelled, and this might help with public acceptability of road user charging, there is an incongruity with charging more for a long journey on uncongested roads than for a shorter journey in heavy congestion, especially when the shortest journeys are those most easily converted to walking, cycling and public transport. A system that is aware of these issues would need to be developed.
60. London Councils would welcome the opportunity to discuss further with the Mayor and TfL how to develop a well-considered, collective strategic road user charging scheme for London. We need to be aware of the potential of creating a complex system for road users and collectively mitigate the potential disbenefits of displacement as individual boroughs develop road user charging schemes. As well as private cars, it is important to focus on reducing private hire vehicles, HGV & LGV and coach journeys alongside private vehicles.
61. We consider it unfair for new infrastructure, particularly river crossings in east London, to attract charges, whilst those going west continue to be free to use; and advocate a fairer, London-wide approach that aims to reduce congestion and pollution for all Londoners.

9) Proposals 20 and 21 set out the Mayor's proposed approach to localised traffic reduction strategies (see page 83).

To what extent do you agree or disagree with this approach? Please also describe any other measures you think should be included.

62. London Councils strongly welcomes the recognition in the MTS that Borough Traffic Reduction Strategies will have different approaches to reducing vehicle demand in different parts of London. We welcome the suggestions given on pages 84 and 85 of the draft MTS that could form part of Borough Traffic Reduction Strategies.
63. We seek urgent clarification on whether boroughs are required to produce a Borough Traffic Reduction Strategy (we consider the MTS does not require them) and whether funding for boroughs is dependent on having one (the MTS is less clear). We also want to see the flexibility that where boroughs already have a sustainable travel plan or similar, or decide to jointly produce a sub-regional traffic reduction strategy, this will be accepted in place of individual borough strategies.
64. We want to see the Mayor give further consideration to the incentives and benefits that boroughs could offer as part of reducing short and non-essential trips in their traffic reduction strategies, as well as or instead of, road user charging and changes to parking policy.
65. In boroughs where the 'school run' is contributing to local traffic congestion boroughs will seek support to encourage behaviour change away from the use of the private car towards using public transport, particularly for secondary school pupils to get to school. This in turn means boroughs will seek TfL's support in providing adequate public transport to schools; with the right connections, timings for the school day and capacity for school children alongside other users.
66. We welcome the reorganisation within TfL that seeks to bring the borough engagement and TLRN teams closer together, and remove unhelpful distinctions between the two types of road ownership in London. However, these legal distinctions do still exist, yet the draft MTS is silent on what TfL will do to reduce traffic on its roads. Proposal 20 is not specific enough to give us confidence on this. Borough traffic reduction strategies need to be supported by TfL's proposals to also reduce traffic so they work in harmony and do not undermine each other.
67. We want to see the final MTS amended as follows:
- Proposal 20: The Mayor, through TfL, will support borough traffic-reduction strategies, including through the Local Implementation Plan funding process, where they are consistent with the policies and proposals set out in this strategy. TfL will commit to implementing traffic reduction measures on its roads, in collaboration with boroughs.
68. We welcome the flexibility in Proposal 21 and the recognition by the Mayor that some boroughs will be keen to pursue road user charging schemes or workplace parking levies and other boroughs will not. Nonetheless, a strategic or place-based approach will need to be taken to road user charging, rather than a highly localised or route specific approach, or traffic will simply be displaced elsewhere or undermined as neighbouring boroughs without charges attract drivers. We seek assurances that TfL will cooperate with borough interest in introducing road user charging schemes, where the TLRN is part of the route or network in a given place.
69. The legislation already exists for workplace parking levies and we expect the Mayor and TfL to fully back any London borough that chooses to adopt these powers.
70. The evidence base for the MTS requires road user charging to be introduced in order to achieve the mode shift of 80 per cent of all trips by 2041 to be made by walking, cycling or public transport. We expect TfL to set out in its delivery plan, and be transparent with the London Councils'

Transport and Environment Committee, about how it will track progress towards this and what the alternative options are if road user charging is not forthcoming by boroughs.

10) Policies 5 and 6 and proposals 22-40 set out the Mayor's draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).

To what extent do you agree or disagree that these plans would help London become a zero carbon city? Please also describe any other measures you think should be included.

71. London Councils welcomes Policy 5 and the broad scope of potential actions the Mayor, TfL and boroughs can take to tackle emissions. Behaviour change is not referenced, and this is an omission. London government has succeeded in recent months in explaining London's air quality problem to the public, and this needs to continue. A London-wide dialogue that includes existing residents needs to explain why people are being asked to make these changes.
72. We therefore want to see the final MTS amended as follows:
- Policy 5: The Mayor, through TfL and working with the boroughs, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible, with an ambition to achieving World Health Organisation levels. Measures will include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/ levies, responsible procurement, the making of traffic restrictions/ regulations, encouraging behaviour change and local actions.
73. London Councils supports in principle the earlier introduction of the central London ULEZ in 2019 and a London-wide ULEZ for heavy goods vehicles from 2020. We have concerns about how to maximise the benefits and we will comment further in the next ULEZ consultation later this year. We welcome Proposal 23 that all TfL buses will meet Euro VI standards for NO_x and particulate matter by 2020. We want TfL to use all the powers available to it to address emissions from coaches, tour buses and other buses in London. Proposal 27 reiterates already-announced targets for cleaning the bus fleet which we welcomed at the time.
74. We support Proposal 24, although a London-wide alert system already exists. Proposal 25 is a continuation of previous work undertaken by this Mayor and previous Mayors to tackle pollution in areas where it is particularly bad and where vulnerable users are concentrated. We welcome continuation of this funding and would welcome seeing funding indications in the final MTS and London Environment Strategy.
75. London Councils will continue to support the Mayor in calling for changes to Vehicle Excise Duty and for a national diesel scrappage scheme to encourage further rollout of zero emission vehicles in London and elsewhere.
76. We welcome plans to make London's transport network zero carbon by 2050 (Policy 6) but note that national government action is the only way for this target to be achieved in London. In light of the government announcement that no new vehicles from 2040 will be petrol or diesel powered, including hybrids, we urge the Mayor to reconsider the timelines set out in Figure 12 to ensure that London continues to be ahead of the national picture given the scale of the air quality problem. We also note that industry is moving much faster than the government's target.
77. We want the Mayor to undertake all efforts to maximise the potential for electricity generation powering electric vehicles in London to be from renewable sources to achieve a genuinely zero carbon transport network, and welcome the focus on this area detailed in the draft Environment

Strategy. We encourage the Mayor to include the milestones to reaching a zero carbon transport network in the final MTS, in a similar way that the route to achieving a zero carbon city by 2050 is set out on page 18 in the draft London Environment Strategy.

78. We welcome Proposal 28 that TfL will produce a plan to accelerate the transition of taxis to being zero emission capable (ZEC). The performance of ZEC taxis needs to be monitored to ensure they are being as effective as possible in reducing emissions, given that they are hybrid vehicles still capable of emitting pollutants. Whilst the target of 2020 is welcome, we are concerned that there is no further action planned for the remaining twenty-one years of the strategy. ZEC taxis is good progress, but not the final outcome, and we want to see the final MTS set out the actions beyond 2020 that the Mayor and TfL will take on taxis. We note that the only clean taxi available for drivers is a ZEC one and we encourage the Mayor and TfL to continue to work with the London Taxi Company to develop fully electric models as soon as possible.
79. Rank provision for taxis and private hire vehicles is absent from the draft MTS yet it affects road space and may affect the ability of boroughs and TfL to deliver the 'gateways' the Mayor wants to see created around major stations in London. In light of the strategic priority in the MTS to reduce traffic, it would be helpful for the final MTS to include reference to rank provision in the priority for road space and modelling on the likely demand for taxis and private hire vehicles in the future, especially with the introduction of autonomous vehicles and the priority to reduce traffic.
80. We want to see the same emission standards set for private hire vehicles as taxis, as private hire vehicles are easier to replace as they are not bespoke vehicles. We therefore want to see a stronger, more detailed Proposal 29 in the final MTS.
81. We welcome the cleaning of the GLA's vehicle fleets in Proposal 30 and the boroughs are committed to cleaning their vehicle fleets as well. We seek further clarity from Proposal 31 on the regulatory and pricing incentives to support the transition to ULEVs in London. We assume this is parking rates, resident parking permit costs and the creation of zero emission roads and neighbourhoods. It would be helpful to have more information on this in the final MTS although boroughs must set their parking charges in response to local circumstances. A London-wide message on the types of vehicle that should be encouraged or discouraged through parking tariffs could be agreed between the Mayor, TfL and London Councils Transport and Environment Committee. An affordable second-hand market will also be necessary to see wide scale adoption of ULEVs.
82. We are disappointed not to see reference to the Go Ultra Low City Scheme in the draft MTS given the boroughs, TfL and the Mayor are working jointly on this. We want the final MTS to include recognition of charging points for car clubs and autonomous vehicles as well as for residential charging. We welcome acknowledgement that an increase in charge points will have impacts on London's energy demand. The final MTS also needs to set out the role of electric vehicles both in line with traffic reduction and zero carbon transport strategic aims.
83. We want to see the text in the final MTS (page 98) amended as follows:
- To succeed in making the transition to zero emission, the charging infrastructure will need to change significantly. This includes meeting the need for rapid charging to support ZEC taxis, private hire vehicles and commercial vehicles, and working with boroughs to provide on-street residential charging, including for car clubs, where state aid permits. The Mayor is working jointly to deliver this charging infrastructure with boroughs and TfL through the Go Ultra Low City Scheme. TfL will work to understand the long-term need for residential charging, including on its network, alongside the potential requirement for alternative fuels for heavy vehicles as a bridging technology. Bringing in ULEVs will require a significant change to London's energy

systems to ensure the supporting supply infrastructure is in place, while maximising CO2 benefits. This will be delivered through the London Environment Strategy.

84. We want to see boroughs necessarily at the centre of plans to develop and implement zero emission zones in town centres (Proposal 33). We want the Mayor and TfL to commit to working with any London borough, central, inner or outer, that wants to deliver a zero emission zone sooner than targeted. We feel the supporting text on page 99 needs to make reference to regulatory and potentially legislative changes that are needed for zero emission zones.
85. We support Proposal 34 and working with manufacturers and government to reduce brake wear and the particulate pollution it creates. ULEVs are not immune from these challenges and therefore focused work on this needs to continue. We note that the London Environment Strategy proposes to reach World Health Organisation limits for particular matter (PM_{2.5} and PM₁₀).
86. Proposal 35 lacks definition and whilst we welcome the minimisation of the energy impact of increased provision of transport services we need to see greater detail to understand what this proposal comprises. We welcome the continued monitoring of emissions from TfL's assets and infrastructure and those of Network Rail included in Proposal 36; and boroughs need to be kept updated on these results.
87. We strongly support Proposal 37 and encourage the Port of London Authority to produce an emissions strategy that reduces the emissions from vessels in the Thames, including its own. We note that the PLA already offers charge discounts for greener vessels, which we support. However, other cities in the UK and around the world are cleaning their fleets faster than the PLA. Bristol has the UK's first hydrogen-powered ferry and the Norwegian villages of Lavik and Oppedal have been linked by a 20-minute electric and battery-powered car ferry since 2015. San Francisco is exploring hydrogen powered ferries. Scotland has two hybrid ferries in operation and a third is being built.
88. We welcome Proposal 38 and the measures the Mayor will take to increase low-carbon energy generation. Whilst we expect this to be covered more fully in the London Environment Strategy, boroughs are already active in increasing solar generation and district heat networks, and we want greater recognition of the role they will play in this.
89. We want to see the final MTS amended as follows on page 101:
- A significant opportunity to increase London's supplies of low-carbon energy can be found in transport infrastructure and land. A programme of solar generation over the next five years will greatly increase the level of solar power in TfL's buildings, and TfL's purchasing power will be used to further stimulate renewable energy generation in London, for example through the Mayor's 'Licence Lite' scheme. In parallel, TfL working with boroughs will identify other opportunities for low-carbon and renewable energy generation, building on the success of the Bunhill waste heat scheme, which exports heat from the Northern line to a district heating scheme in the London Borough of Islington. TfL will also support measures set out in the London Environment Strategy for all GLA Group buildings.
90. We support plans for Non-Road Mobile Machinery to meet NRMM Low Emission Zone standards but want to see a date for this included in the final MTS. We want to see this extended to construction taking place on borough roads as well, given that this would bring greater benefits than only focusing on the TLRN.
91. We want to see the final MTS amended as follows:
- Proposal 39: The Mayor, through TfL and working with boroughs, will meet or exceed the emissions standards set out by the NRMM Low Emission Zone for TLRN all highways

construction and maintenance activities and urges Government to introduce new legislation to ensure that all emissions from NRMM can be effectively reduced.

92. We welcome Proposal 40 and research into the effects of particulate matter on the London Underground network. We expect TfL to introduce an action plan swiftly if dangerous levels of particulate matter are identified on the London Underground, particularly for the benefit of staff who spend long periods of time exposed during their shifts.

Additional measures

93. Whilst we welcome the focus on achieving low and zero emissions from motor vehicles, these vehicles are often still hybrid vehicles and able to emit pollution; cause brake and tyre related pollution even in 'clean' mode; cause congestion; and cause road safety issues. Therefore the policies and proposals in the reducing emissions section should continue to be qualified by the overall priority to reduce car usage.
94. Boroughs also highlight that the physical size of cars is getting bigger and larger models, such as SUVs, are becoming more popular. This has implications for road space, the size of parking spaces, traffic speeds and congestion; as well as being more intimidating for pedestrians and cyclists.

11) Policies 7 and 8 and proposals 41- 47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).

To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

95. We are concerned at the weakness of Policy 7, through the use of 'wherever practicable', compared to, for example, Policy 1E. Greening appears to have a low priority in the ten Healthy Streets Indicators, with 'planting' being one of the measures in the 'Things to see and do' indicator. This will not support the Mayor to make more than 50 per cent of London green as set out in the London Environment Strategy. Looked at differently, we cannot see any examples where a net reduction in green infrastructure or biodiversity contribute to a scheme or city that the Mayor seeks.
96. We want to see the draft MTS amended as follows:
- Policy 7: The Mayor, through TfL and working with the boroughs, will:
- Ensure that transport schemes in London protect existing and provide new green infrastructure ~~wherever practicable~~ to deliver a net positive impact on biodiversity. This will be achieved through the requirement for specific commitments to be made under the relevant planning or development consent regime, including Habitat Regulation Assessment and other environment protection undertakings. Designated spaces such as Sites of Importance for Nature Conservation shall be protected ~~where practicable~~.
97. We welcome Proposal 41 (planting more street trees). Street trees offer high amenity benefits but can reduce space for pedestrians, are costly to maintain and tree roots cause damage to pavements and/or roads over time. We welcome the commitment in the London Environment Strategy to increase tree cover, and we want the funding provided for this planting to include maintenance of trees over time.

98. We want to see Proposal 42 (implementing sustainable drainage infrastructure) strengthened by reference to TfL's SUDS Guide.

We want to see the draft MTS amended as follows:

Proposal 42: The Mayor, through TfL and the boroughs, and working with Highways England, will implement sustainable drainage infrastructure to enable the removal of 50,000m² of impermeable highway surface per year in London. Highways and non-road ~~Other non-road~~ transport projects should be designed to achieve appropriate greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible (in accordance with the drainage hierarchy set out in the London Plan). In all cases, drainage should be designed and implemented in ways that deliver other Mayoral priorities, including improvements to the water quality, biodiversity and amenity of the highway network, using TfL's 'SUDS in London – a guide'.²

99. We welcome Proposal 43 but want to see it strengthened as follows:

Proposal 43: The Mayor, through TfL, will support London's transition to a circular economy by encouraging transport providers to follow GLA Group Responsible Procurement Policy guidance and making it a condition of future contracts.

100. We support the intention in Policy 8 to make London's transport resilient to severe weather and climate change and the key challenges identified on page 208. We question whether TfL has the funding available to do this and the timescales it is seeking. We want to understand the level of priority TfL gives to resilience and climate change on its networks given the inevitability of funding pressures.

101. We propose that any new transport infrastructure be future-proofed to ensure resilience is built into the system. For example, new flood risk management schemes must include climate change allowances,³ to ensure a scheme is future proofed. Such an approach should be taken by TfL in its transport schemes. This will prove more cost-effective over time. We also seek a commitment from TfL's network management team to work more closely with boroughs as there are opportunities to join-up proposals for the highways network with Defra-funded flood risk management schemes. Named contacts at TfL for flood risk managers to discuss schemes would be helpful.

102. We support the proposals for noise given in Proposal 46 whilst recognising there are potential tensions between retiming deliveries to night time for road safety reasons and disturbing the sleep of residents. We want TfL to consider a noise standard for all vehicles, focusing on vehicles that are adapted to be intentionally noisier, such as motorbikes, supercars and vehicles with wide-bore exhaust systems. In the same way we support the proposals for reducing noise from rail set out in Proposal 47, although none of these are particularly ground-breaking and will only be achieved in the long-term due to their reliance on procurement.

² TfL: SUDS in London – a Guide, <http://content.tfl.gov.uk/sustainable-urban-drainage-november-2016.pdf>

³ <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

Chapter 4 – A good public transport experience

12) Policy 9 and proposal 48 set out the Mayor's draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling (see pages 118 to 119).

To what extent do you agree or disagree that these plans would provide an attractive whole journey experience? Please also describe any other measures you think should be included.

103. We support Policy 9 and Proposal 48 that TfL will use the Healthy Streets Approach to direct complementary public transport and street improvements to provide an attractive whole journey experience. This is important to ensure consistency and a joined-up approach across TfL. It would be helpful to understand whether this is the Liveable Neighbourhoods part of LIP funding or whether TfL will be providing additional funding for this.

104. We are concerned about the use of 'as far as practicable' in Proposal 48 and therefore want to see this removed. Healthy Streets Indicators, funding and feasibility will always be part of considerations as to which schemes are progressed.

105. We want to see Proposal 48 amended as follows:

Proposal 48: The Mayor, through TfL and the boroughs, will make improvements measured and prioritised against the Healthy Streets Indicators to transform the design and layout of street space and transport facilities around bus, rail, Underground, London Overground, DLR and other stations, ~~as far as practicable~~, to create safe, secure, accessible, welcoming, well-designed gateways and routes to and from public transport.

106. As we outline at the end of the response, we also want to see the inclusion of tackling the streetscape impacts of phone boxes and telecoms equipment on streets for advertising rather than telecommunication purposes.

13) Policies 10 and 11 and proposals 49 and 50 set out the Mayor's draft plans to ensure public transport is affordable and to improve customer service (see pages 121 to 125).

To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport? Please also describe any other measures you think should be included.

107. We welcome the commitment by the Mayor to freeze fares across the TfL-operated transport network and welcome the extension of the Hopper fare by the end of 2018. We welcome the planned extension to the current Hopper fare but caution against the assumption that this gives TfL greater flexibility to reorganise bus routes and require people to take more than one bus because there is no longer a fares penalty. Cost is one factor that encourages people to take the bus but the convenience (especially when it is one route) and accessibility are two other very important factors. Improving bus reliability, as we develop further in our response to question 15, is therefore an important consideration when thinking about the affordability of the public transport network. Our travel affordability research highlighted the reliance on the bus especially for low-paid Londoners living in outer London and working in central London. We note the absence of any reference to part-time or off peak season tickets. We want to see TfL explore and introduce these on its network.

108. We want to see the final MTS amended to add a new proposal:

Proposal (X): The Mayor, through TfL, will explore options for introducing part-time and off-peak season tickets using Oyster and contactless payment methods by the end of 2018, and commit to introducing them by 2020.

109. Whilst we welcome Proposal 49 that the Mayor will lobby government to match his fares freeze, we are not optimistic of success. We welcome Policy 11 and the Mayor's intention to make the public transport network easier to use and more pleasant. We welcome proposals to provide mobile phone coverage underground and encourage TfL to work with the private sector to secure their investment. We welcome proposals to improve further the customer service experience and want this to extend to information provided to customers during delays. It should not be right that passengers waiting for rail and tube services can find more information on Twitter than is offered to them by station staff or announcements. We also want to see more bus stop countdown timers.
110. We note that a balance continues to need to be struck between street works to improve infrastructure and the delays this causes for road users.
111. We encourage the Mayor and TfL to consider carefully the recommendations made by the London Assembly Transport Committee investigation into bus safety. In particular, we would support the inclusion of safety targets in performance targets given to bus operators; more joined-up safety training across bus operators; and better facilities for drivers along routes, to reduce stress and improve job quality.

14) Policy 12 and proposals 51 and 52 set out the Mayor's draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan (see pages 127 to 129).

To what extent do you agree or disagree that these plans would improve accessibility of the transport system? Please also describe any other measures you think should be included.

112. London Councils strongly supports Policy 12 and it is important London's streets and public transport network are accessible to all. The benefits of walking and cycling and Healthy Streets can be felt by older people and disabled people if streets are designed to be inclusive. This is especially important as London has a steadily increasing population, with a fast growing proportion of elderly people.
113. It would be helpful for the final MTS to identify the stations where accessibility upgrades will take place; or the prioritisation method used. Boroughs and accessibility representative groups should be involved in the process, and agree the trade-off between high-cost but highly-used stations versus lower-cost but less well-used stations. We welcome the stated delivery of the number of step-free stations in each five-year time-band given in Figure 17 on pages 130 and 131 of the draft MTS. We question why delivery halves between 2030 and 2040 and would like this explained (or preferably accelerated) in the final MTS. By comparison to the tube station upgrades (69 step-free stations by 2040), the delivery of step-free National Rail and London Overground is woefully inadequate (30 stations at the bottom end of the estimate, 60 at the top end). We are concerned by this given that the Mayor and TfL should be leveraging funding from Network Rail and the rail operators given the benefits they will see from improved access for all. Outer London relies particularly on National Rail and London Overground stations and therefore it is difficult to see how targets to reduce car dependency can be met if the investment in making stations accessible is not provided. We are also concerned by the lack of future actions in Figure 17 in terms of customer service training for staff in accessibility. This is not something that people are trained in once and then remember for the rest of their careers; it should be continually refreshed and updated with new content as needs change. We assume it is an oversight that beyond 2020 TfL does not plan

to train its staff or provide accessibility travel information; we suggest this section is either revisited or removed if it will become business as usual.

114. We note that Figure 18 demonstrates that by 2041 there will still be parts of London where people requiring a step-free journey still have higher journey times. We consider this to be an unacceptable lack of progress in twenty-five years' time. Some of these places are in outer London, and therefore presumably do not have the challenges of deep-level tube lines. We want to see TfL set out what further work would be required to improve journey times in these areas. For the areas of central and inner London where journey times are still longer, we want to understand what targeted investment would be needed to lower these times further, especially given the dense network of buses. Some parts of London appear to worsen in journey time.
115. We welcome Proposal 52 which includes training for bus drivers and a concentrated effort to make bus design work better for wheelchair users. We want to see the timescales for this included in Figure 17 in the final MTS. We welcome the measures set out in Proposal 53 to improve the overall accessibility of the transport network, but we want to see how TfL will measure the success of this included in the final MTS, for example when and to how many people travel mentoring will be offered; and by when and where a 'turn up and go' service will be provided for wheelchair users. We also suggest TfL uses a 'mystery shopper' approach to ensuring drivers are providing an appropriate level of customer care.
116. We would like further detail on the social needs transport research referred to on page 129 and suggest that this is an activity that London Councils should have been heavily engaged with given that we are administering the Taxicard service on behalf of the London boroughs. London Councils has been working with TfL to achieve better integration of Taxicard and Dial-a-Ride services, including joint procurement to achieve more consistent and cost-effective service provision. We agree that further integration of services provided by London Councils (Taxicard), TfL (Dial-a-ride) and Boroughs (SEN and adult social care etc.) can be achieved and we support working towards this to achieve better and more cost-effective service provision. TfL must acknowledge that although it provides much of the funding for the scheme, Taxicard is a borough scheme managed by London Councils on behalf of the Transport and Environment Committee. TfL must therefore ensure full consultation and engagement with TEC, boroughs and Taxicard customers through London Councils on any proposals concerning the Taxicard scheme.

15) Policy 13 and proposals 53 and 54 set out the Mayor's draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed (see pages 133 to 137).

To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

117. We welcome the recognition of the key role of the bus in improving public transport access in London, relatively quickly and cheaply. We recognise the need to improve bus reliability times, and the need to introduce new bus routes in areas of new development, something boroughs have long called for TfL to be more responsive on. We expect this to change given the level of support for the bus in the MTS and for TfL to deliver new bus routes ahead of new development, not after it is built when travel patterns have already become established. We seek a more bespoke approach to Proposal 53, 'to adjust bus service volumes to remove existing services where they are no longer required in central and inner London and use this freed-up capacity to provide new or improved services in outer London'. This gives the Mayor and TfL a very broad scope with little that is measurable in terms of timescales, geography or scale of the changes. We want removal of services to happen only when stakeholders can be satisfied they are genuinely not required. Inner

London boroughs highlight the affordability of the bus compared to the tube and the new Elizabeth line services, and that a transition onto these modes cannot be assumed for all journeys, especially by the low-paid. The need to provide affordable bus services in inner London remains. Reallocation of bus mileage should take account of borough views especially as boroughs understand better than TfL and the Mayor where current needs are and future development is happening. We want to highlight the need for buses to better serve existing development that is poorly served and not only new development; and that outer London boroughs are already identifying areas and routes for the redistribution from central London.

118. Policy 13 focuses on transforming the *quality* of bus services in London, but the *quantity* of service provision also needs to be addressed. We want TfL to revisit its Business Plan statement that overall bus mileage will not increase, given the importance of new orbital routes, express routes, improving public transport to new and existing developments and being more responsive, all of which are cited in the draft MTS.

119. We support Proposal 54D to improve bus priority on key radial routes, and want to see a similar proposal included in the final MTS for orbital routes:

Proposal 54(f): Improving bus priority on key orbital routes in inner and outer London, targeting those routes with high patronage to the benefit of bus users.

120. Whilst improving bus reliability on radial routes is important, rapid orbital bus routes are desperately needed to properly connect town and district centres in outer London and parts of relatively disconnected inner London and reduce car usage because public transport links are so poor. Whilst we otherwise support the proposals in Proposal 54, TfL needs to recognise that the construction of Healthy Streets and Liveable Neighbourhoods works may delay bus times; but the long-term benefits (for example safer cycling or more walking due to better crossings) outweigh the short-term costs (delays to bus journeys during works). In the same way the most ambitious Healthy Streets projects may not involve buses, and we expect TfL to work constructively with boroughs and not prevent these schemes coming forward. Timed restrictions may also be part of the solution for bus priority, and these should be referenced in Proposal 54 in the final MTS.

121. We are also concerned about the statement that despite reviewing the bus services provided to hospitals in London, "most require additional funding and infrastructure such as bus stands". We recognise there are challenges to improving bus infrastructure when TfL does not own the land, but we want to see TfL identifying how funding can be secured to undertake works that its reviews recommend, where it does not have the funding itself. Changes to TfL's Business Plan should also be considered in these situations.

122. We are concerned that TfL is not only consulting on removing bus routes, but starting to withdraw or reorganise them already in central London, despite the Elizabeth line not being open. We felt that the approach taken in redistributing buses from the Oxford Street corridor lacked strategic focus; and gave no consideration to Opportunity Areas, Growth Zones or air quality benefits or dis-benefits. We welcome the wording in the draft MTS of the need to take a more strategic approach to bus network planning. We were pleased to see a much improved, holistic approach to the proposals for west, southeast and northeast London bus routes following the opening of the Elizabeth line and we want to see this approach continue.

Additional measures

123. Extending the tram network is not considered in the draft MTS, despite other cities in the UK investing in their tram networks and pressing ahead with expansion. The tram could bring benefits to other parts of London if it was considered holistically and there could be bus priority corridors

that could function better as tram priority corridors. LB Sutton wants to see the tram network extended to Sutton town centre and the cancer hub at Belmont, to provide a new transport route to the school and employment site planned for there.

16) Policy 14 and proposals 55 to 67 set out the Mayor's draft plans to improve rail services by improving journey times and tackling crowding (see pages 140 to 166).

To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

124. The rail capacity improvements proposed in Policy 14 and detailed in Figure 21 do not represent any new proposals and are misleading to claim them as 'proposed'. The Elizabeth line and Thameslink upgrade will open in the next couple of years; and High Speed 2 is not a scheme the Mayor can claim any role in given it is a DfT scheme. Crossrail 2 and the Bakerloo line extension, which we support for the capacity upgrades they bring and the overcrowding they address, do not address the need for more orbital connections and we will continue to support boroughs that develop jointly more proposals for orbital routes, in a similar way to the West London Orbital Line (proposal 83). Given the length of time it takes to gain scheme support, London needs to start developing proposals for 2040 to 2060 by the mid-2020s.

125. Failing to provide orbital links in London reinforces the need for people to work and live further apart. To achieve the objectives of the MTS, more employment needs to be provided in outer London and the Mayor needs to work proactively with boroughs to facilitate this. Ultimately overcrowding will serve to drive more people away from the busiest transport modes.

126. We support measures to encourage passengers to change their journey patterns and walk or cycle rather than use crowded tube trains. Data from the Wi-Fi journey patterns pilot earlier in 2017 could be one such way of using data intelligently to deliver bespoke options for passengers based on their actual journeys. TfL needs to work with Network Rail to encourage it to take a similar approach to providing data to its passengers, not just in London but across the UK.

127. We want to see the final MTS amended as follows:

Proposal 55: The Mayor, through TfL, will seek to consistently deliver real-time data, information and visualisations for the Tube, rail, buses and streets via multiple customer channels. TfL will develop real-time tools for operational staff to improve the communication of overcrowding and congestion information to customers. TfL will seek to work with Network Rail to make more of its data available to its passengers.

128. London Councils supports Crossrail 2 and we continue to work with the Mayor to secure government support for the scheme. Crossrail 2 will alleviate overcrowding on the South West Mainline but Mayoral support for the Network Rail proposals for the Brighton Mainline are also needed as the Network Rail's Sussex Route Study shows standing at 140 to 200 per cent above seat utilisation north of East Croydon by 2023 even with the current Thameslink Upgrade.⁴ This is not reflected in the draft MTS at Figure 32 or Figure 33 and we want to see this addressed in the final MTS.

129. We welcome the tube line upgrades in Proposal 58, the identified national rail upgrades in Proposal 59, the Overground capacity upgrades in Proposal 63 and the plans to increase DLR

⁴ Network Rail, South East Route: Sussex Area Route Study <https://16cbgt3sbwr8204sf92da3xxc5m-wpengine.netdna-ssl.com/wp-content/uploads/2016/11/South-East-Route-Sussex-Area-Route-Study-FINAL.pdf>

capacity in Proposal 65. We also welcome accompanying station capacity upgrades (Proposal 67).

130. We welcome plans to increase tram capacity in Proposal 66 but want the final MTS to be more ambitious in its approach to tramlink extension, not only to Sutton and the cancer hub site in Belmont but in considering other extensions and new stations on the existing network to support housing and jobs growth.

131. We therefore want to see the final MTS amended:

Proposal 66: The Mayor, through TfL, will upgrade the existing tram system to improve its reliability and to increase its capacity by 85 per cent to/from Croydon by 2030 and explore innovative funding mechanisms to deliver tram extensions to the existing network.

132. London Councils supports the devolution of rail services to TfL which is set out in Proposal 61. We support Proposal 60 and want TfL to be working to create a suburban metro in collaboration with the affected boroughs as soon as possible and regardless of the outcome of rail devolution. Affected boroughs need to be involved in the franchising and TfL needs to set out how it will improve connections, reliability, overcrowding and frequency and the level of investment in signalling and infrastructure this will require. High-speed paths must be protected with any extension of the London Overground.

133. Whilst we support the principle of creating 'mini radial' public transport links that will improve 'orbital' public transport connectivity, nothing in Figure 29 convinces us that anything new is being proposed. We therefore require more information before we can support this proposal.

134. We support Proposal 64 to encourage the rerouting of freight to free up passenger paths. We expect this to form part of the work with the Wider South East Political Steering Group⁵. The Mayor should continue to add his voice to electrification projects around the UK where discernible benefits to London can be seen.

17) Policies 15 to 18 and proposals 68 to 74 set out the Mayor's draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully inclusive and well-connected public transport system. The Mayor's policy to support the growing night-time economy is also set out in this section (see pages 176 to 187).

To what extent do you agree or disagree that these plans would deliver a well-connected public transport system? Please also describe any other measures you think should be included.

135. We strongly support Policy 15 to make better use of the River Thames for passengers and freight and to better integrate river services with walking and cycling. For this to be fully achievable, frequency and cost of services needs to be addressed. We want to see Policy 15 widened to encompass not only the River Thames but the canals and other waterways that have potential to act as freight channels, as outlined in our response to question seven.

136. We can support Proposal 68 for new piers, additional capacity and new cross-river ferry services; and the extension of river services to Barking Riverside in Proposal 69 if these are clean-fuelled craft (see our response to question 10 at paragraph 86). We agree that pier development

⁵ The Wider South East Political Steering Group brings together London government (the Deputy Mayor for Planning and Regeneration plus three borough leaders) with politicians from East of England LGA and South East England Councils.

needs to be in tandem with new developments and TfL needs to work closely with the boroughs on this. Pier capacity needs to be addressed not only for passengers but for freight as well.

137. We support Policy 16 on enhancing public transport improvements between London and the rest of the UK and Proposal 70 that transport investment supports identified housing and economic growth corridors.
138. We want to ensure that through Proposal 71 the affected boroughs are supported by the Mayor to secure high quality gateway stations that support the arrival of High Speed 2.
139. As TfL finds a new base for the coach industry in London (Proposal 72), we recognise the importance of this strategic asset. We want TfL to include incentives for coach companies to clean their fleets, for example through lower access charges for cleaner vehicles. Boroughs must continue to be involved in the siting of coach provision on- and off-street given the space and air quality implications.
140. London Councils supports Policy 17 for transport to support London's night-time economy. Transport services are as important in enabling workers to travel to and from their jobs and we are pleased that the night tube has not led in the main to the concerns boroughs had about anti-social behaviour, noise and crime. We expect TfL to continue to work with boroughs as more night tube lines open; and we reiterate the importance of the night bus network to low-paid Londoners who work anti-social hours.
141. We support the broad scope of Policy 18 in ensuring that London's taxi and private hire vehicle service is safe, secure and accessible. We support the Mayor seeking additional powers to limit the overall numbers of private hire vehicles in London and powers to address the bizarre situation that drivers not licensed by TfL can operate in London, and vice-versa (Proposal 73). Nevertheless we seek acknowledgement from the Mayor and TfL that taxis and private hire vehicles contribute to congestion and air pollution and encouraging people to walk, cycle and use public transport does include reducing usage of taxis and private hire vehicles; which the final MTS needs to state.
142. We want to see Proposal 74 strengthened to include greater commitment from TfL to provide sufficient resources to enforce safety standards for taxi and private hire vehicle passengers and drivers and drive up standards of customer service.
143. We want to see the final MTS amended as follows:
- Proposal 74: The Mayor, through TfL, will raise the safety and customer service standards for all customers travelling by taxi and private hire vehicles and drivers by committing to through ongoing training and effective and transparent regulation and enforcement.

Chapter 5 – New homes and jobs

18) Policy 19 and proposals 75 to 77 set out the Mayor's draft plans to ensure that new homes and jobs are delivered in line with the transport principles of 'good growth' (see pages 193 to 200).

To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

144. We support the principle that transport can help unlock high-density, mixed-use development and unlock growth potential in underdeveloped parts of London (Policy 19). We support the transport principles of good growth given on page 193 of the draft MTS.
145. Good growth development should move towards being carbon free, as transport is doing, to reduce air pollution and reduce the demand on the electricity grid through better design, increased energy efficiency and utilising renewable energy sources.
146. We support the re-examining of PTAL (Public Transport Access Levels) to include cycling as well as walking, as long as safe, easily navigable cycle routes do exist and equal weight is not given to the ability of someone to cycle (given a bicycle is required, whilst most people are able to walk). We note the implications this will have for borough cycle safety training.
147. We remind the Mayor and TfL that capacity, as well as frequency and connectivity is important. Whilst development in places where PTAL levels are strong is sensible, people do need to be able to board the buses, trams and trains to achieve sustainable growth.
148. We note the potential conflict exists between safeguarding industrial land for consolidation centres (page 73) and converting low-density land use around stations to allow for high-density, mixed use development (page 196). The Mayor and TfL must engage with boroughs at the earliest possible stage when land in GLA or TfL ownership is coming forward for development, to ensure it aligns and supports wider development plans in a borough. It may be appropriate for it to be packaged effectively to support a larger development. Boroughs will seek to do the same with Network Rail. Discussion about release of TfL land is not new, and it is now time for this release to accelerate. Redevelopment of, for example, railway arches must balance affordable homes and business units with maximising profit, and a range in affordability of tenures should be considered.
149. We support densification around the public transport network (Proposal 75) but there must always be a balance between jobs and homes, something boroughs find is not always acknowledged given the pressure TfL is under to finance schemes, and because building homes is usually most profitable. Scheme promoters must also take seriously their responsibilities to relocate businesses if higher rents or a loss of business space is a consequence of redevelopment. Densification should always be pursued sensitively to the existing place.
150. We want to see the expectations around car parking provision in new developments qualified and re-examined in the final MTS from a central, inner and outer London perspective. We note that this policy in the MTS can only be supported by new parking standards in the London Plan, and that there will remain a period of time between adoption of the MTS and the London Plan where developers will be able to ignore the new Mayor's policies here. We note that outer London boroughs are competing with local authorities outside London for businesses and there is some anecdotal evidence that car parking can be a factor in this location.
151. We support the provision of cycle parking and the need for developers to contribute to on-street facilities through the CIL process. We would welcome the London Plan setting out cycle parking provision standards, which should use London Cycling Design Standards. We support Proposal 77 regarding delivery and servicing plans, although we qualify our comments with those made

regarding Proposal 46 in times of night noise. Boroughs were however expecting this to take account of central, inner and outer London needs and constraints, and we want to see this included in the final MTS. We welcome the ambition to demonstrate what is possible in Opportunity Areas and around major developments but this learning needs to be quickly rolled out for all boroughs to make use of.

152. We want to see the final MTS amended as follows:

Proposal 76: The Mayor, through TfL and the boroughs, will:

- i. Impose high expectations on developers to deliver transport solutions that will promote sustainable mode shift, reduce road congestion, improve air quality and assist in the development of attractive, healthy and active places;
- ii. Restrict car parking provision within new developments, with those locations more accessible to public transport expected to be car free. New developments should contain high levels of cycle parking and storage, and contribute to the provision of on-street cycle parking including cycle hire or cycle club schemes in town centres and other places of high demand. Where parking still exists, new developments should facilitate the rollout of electric vehicles by installing electric vehicle charge points.
- iii. Impose high expectations on developers to use construction consolidation centres and delivery and servicing plans.

Car and cycle parking guiding principles

- i. An expectation for car-free development in central London, and London's more accessible areas in inner and outer London;
- ii. New parking standards may be developed (through the new London Plan) to ensure car-lite development in inner and outer London;
- iii. Any residential parking spaces permitted should make provision for electric vehicles to enable carbon-free travel;
- iv. Appropriate provision for spaces for dedicated use by disabled drivers;
- v. In some places, dedicated provision of electric, hydrogen or hybrid car club bays could reduce the need for on-site private car parking;
- vi. Well-located, secure and accessible cycle parking provision including for visitors and cycle clubs / cycle hire to meet new minimum standards (~~may be~~ developed through the new London Plan).

153. We note that (iii) in the above principles is very ambitious as electric vehicles are only carbon-free if they are charged from renewable sources. We want to see reference to the car and cycle parking guiding principles included in the Mayor's Housing Strategy as well.

154. We also suggest, as set out in our response to question two, that the Healthy New Town initiative with NHS England may be a useful contributor to, and supporter of, the Mayor's Healthy Streets Indicators, where large-scale regeneration is planned. It could also be beneficial to involve the Design Council and its 'Active by Design' advisory service to encourage active travel in streets and buildings.

19) Proposals 78 to 95 set out the Mayor's draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving

existing public transport services, providing new river crossings, decking over roads and transport infrastructure and building homes on TfL land (see pages 202 to 246).

To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth? Please also describe any other measures you think should be included.

155. We support Proposal 78 and the Mayor's plans to use transport to invest in growth in the CAZ, Opportunity Areas and in and around town centres, as we support efforts to achieve polycentric development. We welcome the recognition in the draft MTS that suburban London cannot reduce its car dependency without extending the public transport network and upgrading the existing one, including buses.
156. We support the schemes set out in the MTS at Proposals 79-83:
- Crossrail 2 and the four-tracking of the West Anglia Main Line;
 - Bakerloo line extension to Lewisham;
 - Elizabeth line extension to Ebbsfleet;
 - London Overground link between Hounslow and Cricklewood via Old Oak Common (West London orbital line).
157. London Councils would welcome a review of where new rail stations could help unlock significant number of homes (Proposal 84) as well as improve connectivity. One such example would be to reintroduce the high-level platforms at Brockley to facilitate new connections between Nunhead and Lewisham and Nunhead and Catford. However, given TfL's funding challenges, it would be helpful to have this proposal qualified with scope and timescales.
158. We strongly support Proposal 85 and recognition that the bus network can help provide denser developments. We would strongly welcome complementary improvements to bus services to accompany major transport infrastructure improvements, but again, with funding difficult for TfL, we need to understand the scope and timescales for this proposal and whether this is a medium-term priority or is part of the redistribution of services from central to outer London. We strongly welcome Proposal 86 and the piloting of bus rapid transit networks in outer London Opportunity Areas. These, and existing express routes, need to be low emission buses suited for the nature of the journeys they undertake. Again, we need to understand timescales, likely scope and the readiness of TfL to apply the lessons learnt to other parts of outer London that need a better bus network.
159. We support improved bus connections and the exploration of demand-responsive bus services. However, given the scale of the potential areas that could benefit (Figure 42, one third of London) we want TfL to agree jointly with boroughs and ourselves how areas will be prioritised for exploring these routes. We propose that areas that are not Opportunity Areas be considered first, since Opportunity Area development ought to bring high density development that can in time support traditional bus routes.
160. We want to see Proposal 87 strengthened in the final MTS as we note that Proposal 99 includes a commitment to trial demand-responsive bus services. We suggest that these sections are brought together to make it clearer that TfL is committed to these services, and merge the proposals, as we have set out below:
- i. Proposal 87: The Mayor, through TfL and the boroughs, will explore and trial the role for demand-responsive bus services to enable further sustainable housing development,

particularly in otherwise difficult to serve areas of outer London and parts of relatively disconnected inner London.

161. Affected boroughs will make representations on Proposal 88 (Silvertown Tunnel).
162. We support new walking, cycling and public transport river crossings, particularly in east London, to support new connections between places on either side of the Thames. We encourage the Mayor to use the experiences of other UK and international cities in achieving bridge design whilst facilitating river use by large boats. We encourage the Mayor to work with the private sector where possible to secure funding for suitable schemes. We take the view that Proposal 90, setting out principles of any future road crossings in east London, pushes the issue thoroughly into the long-term, given the number of interventions that have to be delivered before the Mayor will consider a road crossing. Relevant boroughs are concerned that they will not be able to deliver the expected growth with timescales for a road crossing in the 2030s or even 2040s. That said; we support the principles set out in Proposal 90 in determining the factors to assess the appropriateness of a river crossing.
163. We want TfL to play its part in releasing its land for affordable housing and other development in a proactive manner, especially where a borough is progressing other schemes in the vicinity. We support Proposal 91 but want this to become something TfL actively pursues, rather than undertakes when forced to do so.
164. We support Proposal 92 for mixed use development in and around operational sites, noting its links to Proposal 75. Whilst acknowledging they are not always close to stations, we want TfL to consider releasing railway arches and other small sites for redevelopment; and for the Mayor to work with boroughs to persuade Network Rail to do the same. Unused sites are often blighted by flytipping and boroughs want an open dialogue about improving these sites, even if they are still needed operationally. Addressing noise nuisance will be important as part of bringing sites forward for development.
165. We support Proposal 93 which would see the relocation of a 1.3km stretch of the A13 in the borough of Barking and Dagenham into a tunnel. This would deliver significant improvements to traffic flow and air quality, would reduce severance and unlock land at Castle Green for redevelopment.
166. We support the principles in Proposal 94 for delivering good growth but expect these principles to consider boroughs equal partners in efforts to coordinate delivery. We support improved public transport surface access to London's airports and note that the Airports Commission did not consider enhancements in southern access to London Heathrow Airport dependent on expansion.⁶ The relevant boroughs have raised their concerns regarding the alignment of the southern access link mapped in Figure 52 which does not appear to be a scheme alignment anyone has discussed. Whilst we understand from TfL officers that this was purely indicative and does not represent an actual scheme, we would like to see officers work closely with the relevant boroughs to provide a more accurate rail alignment for the final MTS. London's airports also require better cycle links for airport workers and we want to see this reflected in the final MTS.

Additional measures

⁶ Airports Commission, Final Report (July 2015), paragraph 7.41, page 146

167. We want to see the section 'public transport links to airports' on page 246 changed to have a broader focus on international travel. London is served by international rail services from London St Pancras via Eurostar and freight and passenger services via the Channel Tunnel. There is no reference to either of these in the draft MTS, and we suggest the Mayor considers his approach to them in the final MTS.

20) Policy 20 and proposal 96 set out the Mayor's proposed position on the expansion of Heathrow Airport (see pages 248 to 249).

To what extent do you agree or disagree with this position? Is there anything else that the Mayor should consider when finalising his position?

168. We have no comments on the expansion of Heathrow Airport. We expect individual boroughs will make their own representations on this issue.

Chapter 6 – Delivering the vision

21) Policy 21 and proposals 97 to 101 set out the Mayor's proposed approach to responding to changing technology, including new transport services, such connected and autonomous vehicles (see pages 258 to 262).

To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

169. London Councils agrees that TfL needs to ensure its payment methods keep pace with technological developments (Proposal 97).
170. In terms of new technology, particularly where this relates to car travel, we share the Mayor's concerns that car clubs, ride-sharing and other forms of car-sharing should not be a replacement for journeys currently undertaken by walking, cycling and public transport. However, whilst we agree that a shared car takes up the same amount of space as a private car, this obscures the fact that one car on the road takes up less space than four. We agree that the Mayor and TfL cannot predict the new forms of technology that will transform journeys in the future, and nor should they try. We welcome the recent appointment of TfL's small horizon scanning team to ensure that TfL is not left catching up as new technology enters the market. London is often not the first place such technology is launched, and TfL must continue to monitor other cities in the UK and the world to see potential new arrivals; and start early in working through the opportunities and challenges. We have seen this with dockless cycling in summer 2017 and there must be other examples of cities experiencing disruptive technologies that London can learn from.
171. We therefore welcome and support the principles set out in Policy 21 for assessing the role of new technology in the transport network in London. However, we are concerned at the lack of specific direction on the role of autonomous vehicles, given they are already being developed. Therefore the final MTS, which runs to 2041, must address directly the role of autonomous vehicles and set out their role in London's future transport system. Enough is already known to understand the risks and opportunities, and rather than waiting to develop more detailed policies in due course (page 261) the Mayor needs to identify now the role of autonomous vehicles in London, the benefits they should deliver and not deliver, and consider how autonomous vehicles and electric vehicles will interface, particularly given charging requirements. Failure to do so risks the success of the MTS. We want to see a specific and much clearer approach to autonomous vehicles set out in the final MTS as well as consideration given to the impact on TfL's fleets including buses and dial-a-ride vehicles as well as taxis and private hire vehicles. Borough parking policies may also need to change in the longer-term. These changes will emerge long before the end of the MTS in 2041. We support the trialling of these vehicles, which is already happening (Proposal 100) but require far more detail and want borough input into the "mix of policy and regulation" suggested in Proposal 101 before we can support such a broad and open-ended objective. The MTS should make clear what the aim of further trials should be, for example what benefits autonomous vehicles are trying to deliver and not just to prove that the technology can work. Any trials and research should consider the full range of impacts and consequences for London, including safety, congestion and the environment but also employment, equality and health.
172. We seek better understanding of how TfL plans to monitor the relationship between kerb space and demand for car travel before we can support Proposal 98 fully. As boroughs own and manage the majority of London's kerb space, we need to understand what is expected from boroughs here. To enable road data (kerbside restrictions, loading bays, bridge heights, disabled bays, road widths etc.) to be digitised and shared as open source to assist smart route planning, app

development and autonomous vehicles, boroughs and TfL should agree a standard for the recording of this data.

22) Policy 22 and proposal 102 set out the Mayor's proposed approach to ensuring that London's transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).

To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

173. We support the Mayor's efforts to secure devolution to ensure that London's transport network can be effectively funded in the future. This devolution must not stop at the Mayor and TfL, however, and boroughs need further devolution of powers and funding as well. London Councils supports the recommendations of the London Finance Commission and is working with TfL on land value capture.

174. We therefore want to see Policy 22 amended in the final MTS as follows:

Policy 22: The Mayor will seek to ensure that London's transport system is adequately and fairly funded to deliver the aims of the Transport Strategy. Additional powers should be devolved to the Mayor, the GLA or TfL and the boroughs to enable the Mayor and his agencies to respond effectively to economic, social and environmental change. This includes financial, regulatory and other powers to enable London's challenges to be met, and emerging opportunities to be optimised.

175. We support efforts by TfL to continue to drive efficiencies through its work. We continue to encourage TfL to seek to maximise the advertising potential of its assets and by selling its expertise abroad. We therefore support Proposal 102.

23) Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor's approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283).

To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

176. We have provided comments separately on the Local Implementation Guidance which accompanies this submission.

177. In summary, with regards to the Local Implementation Plan (LIP) Guidance, we are concerned at the level of prescription in the document, regardless of whether that was intended, and the requirement for boroughs to develop targets for a series of delivery indicators where the Mayor is not developing his own targets. We feel it remains appropriate for boroughs to set targets against the outcome measures alone, as they have done under LIP2. A more ambitious strategy does not necessitate more requirements on boroughs. We also have some suggestions on shortening the Guidance that we will raise in our response.

178. We note that whilst the MTS is ambitious, the timescales remain short for boroughs to develop their Local Implementation Plan. We therefore ask for acknowledgment that boroughs will not be able to deliver substantial amounts of what is an ambitious strategy before the end of the Mayoral term.

179. Where boroughs choose to do so, we support sub-regional delivery of the MTS as well as individual borough delivery.

24) Are there any other comments you would like to make on the draft Mayor's Transport Strategy?

180. The draft MTS set out a strong vision but lacks the deliverability and detail of milestones behind it. Given the level of monitoring and target setting boroughs are required to provide in their LIPs, the draft MTS needs to set out more of this for TfL.
181. The MTS is silent on the role of sub-regional partnerships, which have for a number of years provided forums for information sharing and collaboration between key stakeholders, including London boroughs and Transport for London. This is alongside their role delivering sub-regionally focused schemes and projects via the LIP funding process. It is of concern that this work has not been recognised and support offered for ongoing working at a sub-regional level.
182. Travel Plans are an excellent vehicle to deliver many of the MTS aims and motivate businesses, schools and residents. While mentioned in places, the MTS must be clearer and stronger about the use of Travel Plans in new developments as it is with delivery and servicing plans. We note that voluntary plans are often more effective long-term than those required through the planning process. One option for boroughs could be to achieve the physical interventions through planning conditions and then work with residents, schools and businesses to develop travel plans.
183. Whilst being data-driven is referred to on several occasions throughout the draft MTS, there is no single point where the Mayor sets out his overall approach to using data and sharing it with boroughs. We want to see a specific commitment in the final MTS for the Mayor, through TfL, to share data with boroughs to help boroughs monitor their interventions, determine policy and influence design.
184. To assist with this, TfL needs to change its modelling and traffic assessment tools to prioritise sustainable modes. These models currently prioritise traffic movement and will be a barrier to delivering the aims of the MTS.
185. To support more innovative schemes, for example requiring SUDS or upgraded paving, boroughs need greater funding for asset management and ongoing maintenance. The Mayor and TfL should continue to work with London Councils and the boroughs to call for a fairer share of road maintenance funding nationally and for adequate funding to repair potholes and prevent them occurring in the first place.
186. We note that in some parts of London the number of cars a property has is linked to the affordability of homes, where adult children continue to live with parents, and they all have their own car. Increasingly businesses ask their staff to take their work vehicle home with them, which leads to these vehicles being parked on residential streets.
187. In some parts of London health boundaries are not coterminous with the Greater London boundary. Consideration of travel to and from hospitals should take into consideration the need for some residents to travel beyond the London boundary.
188. Boroughs would welcome the inclusion of tackling the streetscape impacts of phone boxes and telecoms equipment on streets for advertising rather than telecommunication purposes;

189. The draft MTS should support boroughs to relocate lanterns, street nameplates, telephone boxes etc. onto buildings to help declutter and create tidier streets with more space for pedestrians;
190. The draft MTS does not mention any potential role for electric bikes, for example in helping Londoners undertake longer journeys or for freight purposes.
191. The draft MTS does not address the usage of hover-boards and similar devices on pavements.