

▶ London Councils response

▶ Draft Local Implementation Plan Guidance

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 of its member authorities regardless of political persuasion.

Introduction

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 LIP3 Guidance.

LIP funding

The Mayor and TfL provide LIP funding for boroughs in recognition that delivery of the Mayor's Transport Strategy will not happen without this. London Councils worked closely with the Deputy Mayor and TfL to secure the continuation of LIP funding at levels seen under the previous Mayor. We therefore welcome the protection of the Corridors element at £75m from 2018/19 to 2021/22 and recognise that this level of funding is higher than that funded to the boroughs between 2014/15 and 2016/17.

We are concerned however at the loss of the Local Transport Funding element which represented £100k per borough annually. We wrote to the Deputy Mayor on 16 November 2016 and set out our principles for a future LIP model. This included "acknowledg[ing] that there are local priorities for local politicians that do not always align with the Mayor's objectives, and allow[ing] some funding for these". We now understand that the loss of the Local Transport Funding, which was not discussed with London Councils or boroughs in advance, and was revealed without prior notice with the publication of the draft LIP3 Guidance on 21 June 2017, is in order to protect the £75m Corridors element. In our view, this does not represent protection or maintenance of LIP funding for boroughs; boroughs will receive £3.3m less funding and this is represented by the fall in funding from £78m in 2017/18 to £75m onwards. This approach, which represents a loss of flexibility for boroughs, would also appear to be opposite to what the Deputy Mayor was keen to retain and undoes the principles agreed in the City Charter in 2009. We understand the Mayor wants to be flexible, and acknowledges that some of the policies in the MTS will be more deliverable by some boroughs than others. We therefore seek the restoration of the Local

Transport Funding in the final LIP Guidance, and want it taken from TfL programmes and not borough programmes or the overall LIP funding allocation; since only this way can TfL accurately have protected LIP funding.

We also note the importance of Liveable Neighbourhoods funding in delivering major changes to streets and places to create Healthy Streets. The availability of Liveable Neighbourhoods funding will be the limiting factor for what can be achieved, and we encourage TfL to keep this under review.

Flexibility for boroughs

We continue to welcome the ability of boroughs to set their own locally specific targets. As referenced above, we welcome the recognition from the Deputy Mayor that some boroughs will wish to pursue more innovative measures whilst others will not. In the spirit of collaboration and flexibility, we request the removal of paragraph 1.13 from the final LIP guidance.

Paragraph 1.13 The boroughs will continue to enjoy considerable freedom in deciding how best to respond locally to the MTS. However, a more directed, evidence-led approach will be taken towards certain elements of LIP funding to meet growth or other strategic MTS objectives, including the new Liveable Neighbourhoods programme that is to supersede Major Schemes. This new approach will be informed by TfL analysis and research that will be shared with the boroughs to encourage greater buy-in to joint working towards delivering what London needs.

There has always been a requirement for boroughs to produce LIPs that are evidence-led, and boroughs have long called for TfL to share more of its data to enable them to better make evidenced interventions and decisions. We reject any attempts at making the LIP process more directed, complex or prescriptive and believed we had agreement from TfL and the GLA for this, especially given the resource requirements associated with producing and validating such a detailed document. We also want to see added to the final LIP3 Guidance a paragraph similar to paragraph 2.26 from the LIP2 Guidance, which reiterates boroughs' own needs and the flexibility we believe the Deputy Mayor supports.

Paragraph 2.26 LIPs are important tools that help each borough work with its stakeholders to strengthen its place-shaping role and its delivery of services to the community. The new flexibilities outlined in Chapter one and the relationship of LIPs to the wider local policy context should enable every authority to prepare a plan which best meets its own individual needs. In particular, there is an opportunity for authorities to develop plans that link transport with an area's wider agenda for the economy, education, employment, health, equality and social exclusion, crime and the environment. Close engagement with the Local Strategic Partnership (LSP) and other local service providers will help integrate other organisations' planning for services with the borough's transport goals.

Delivering outcomes, not proposals

Page seven of the Executive Summary (under Core Requirements) of the draft LIP3 Guidance states: “boroughs are required to set out their approach to implementing and delivering all policies and proposals in the MTS which are relevant to boroughs”. This is repeated under each Outcome set out in Part 2 of the draft LIP Guidance, where it states, “borough delivery plans should address the following policies and procedures” and then lists the specific policies and proposals from the MTS that involve boroughs. This totals 56 policies and proposals. We are deeply concerned about the level of detail and prescription required in the draft LIP3 guidance. The previous MTS had five outcomes; this MTS has nine outcomes. We feel it would be much more appropriate for boroughs to demonstrate how they will achieve the relevant nine outcomes (and we set out below that we do not think all outcomes should require borough action) through their Borough Transport Objectives, and in turn through their Delivery Plans. We want to see this changed for the final LIP3 Guidance to bring it more in line with the approach taken to LIP2.

Annual Spending Submissions

We acknowledge that boroughs have for some years provided annual updates to TfL about progress through the Annual Spending Submission, which is a relatively simple spreadsheet. However, we are concerned at the introduction of additional requirements, listed on page nine of the Executive Summary (though not referenced to elsewhere in the draft LIP3 Guidance):

“Boroughs will be required to continue to submit an Annual Spending Submission in line with current practice. This provides more detailed information on a packaged scheme basis. Within the Annual Spending Submission, boroughs will continue to be required to:

- Set out their overall approach or process for drawing up their annual programmes;
- Indicate which of the MTS priorities each package of interventions supports plus any impacts on signal requirements;
- Identify how the interventions included will help to deliver traffic reduction.”

We do not recognise the above list; boroughs at present are only required to provide the impacts of their interventions on signal requirements and which MTS outcomes their proposals relate to. We do not appreciate these additional requirements being added to this list and portrayed as continuation. We question why TfL needs to know how boroughs draw up their annual programmes and what they intend to do with this information. We understand the focus on traffic reduction given the priority this is given in the MTS but this needs to be proportional and strategic and should be drawn out anyway through the ‘efficient’ outcome; ‘London’s streets will be used more efficiently and have less traffic’. Boroughs can and will use their borough transport objectives and the delivery plan to identify how they will address traffic reduction; the current draft LIP3 Guidance risks turning the annual spending submission process into a lengthy reporting process which we do not welcome.

Performance Monitoring Plan

As we set out below in more detail, we do not support a return to delivery indicators and boroughs being required to set their own targets against these, not least because there are 40 of them listed in Appendix D of the LIP3 Guidance. Those listed are a combination of outcome and outputs, and we question the strategic nature of some of them; for example how many benches are delivered. We want to see a return to boroughs being required to set their own targets against only the Primary Outcome Indicator for each of the nine outcomes (which would still represent 13 targets). Boroughs do not have the resources to discuss and agree multiple, non-strategic targets or the resources to monitor them on a regular basis.

This is especially the case when the Mayor has chosen not to set targets for the Delivery Indicators and so any targets boroughs do set would be arbitrary. They will not make it possible to assess whether, for example, the right number of benches to have been installed over a 25 year period was 100, 1,000 or 10,000. We strongly believe performance should be judged not on the number of interventions but on their quality or ambition. Not all of the delivery indicators referenced are necessarily 'more is good' which is another reason why we seek their removal.

Proforma C already asks boroughs for information on interventions (without them being targets) and so delivery indicators do not also need to be in the Performance Monitoring Plan.

MTS Outcomes

The MTS Outcomes are first referenced on page 278 of the draft MTS. We suggest it would be helpful to include them earlier in the final MTS and more clearly related to the three key themes (healthy streets and healthy people, a good public transport experience, and new jobs and homes) that run through the MTS.

This section should be set in the context that we strongly oppose boroughs being required to set targets against delivery indicators (as well as outcomes). We hope that our concerns in this section will be superseded by the removal of this requirement. If it is not, then these comments are relevant.

We recognise and support the importance of borough action in outcomes one to four,¹ as these relate to the delivery of healthy streets and healthy people. We have some concerns about the suggestions in the remaining Outcomes.

For Outcome 5, 'Connected – more people will travel on an expanded public transport network' we question why borough LIPs are being asked to address:

- Policy 15 (Port of London Authority to produce an emissions reduction strategy) – there is no LIP role for boroughs here and this should be removed.

¹ The first four MTS outcomes are: active, safe, efficient, green.

- Proposal 69 (extension of river boat services to Barking Riverside) – the suggested initiatives here appear to be a planning role rather than a LIP role and the specific geographical location of this makes it irrelevant for most boroughs. LIP Guidance needs to be more flexible so only relevant borough LIPs include identifying pier locations in their LIPs, without it being part of the Guidance for all boroughs.
- Policy 16 (improvements to public transport between London and the rest of the UK and integration with London’s public transport system) – this is predominantly a role for the GLA and TfL and so should be removed. London Councils and boroughs are involved in public transport links beyond London through work with the Wider South East, but this does not need to be part of borough LIPs.
- Proposal 72 (improving coach provision) – there is no explicit reference to boroughs in Proposal 72 and whilst this is an omission, we question the need for all boroughs to include identifying new coach facilities for the Victoria Coach Station in their LIPs. We expect TfL to enter into these discussions with boroughs outside of the LIP process, as the LIP is not the best instrument to achieve this. Equally coach provision will continue to be a priority for some but not all boroughs and the LIP Guidance needs to be revised to introduce greater flexibility at this section.
- Policy 17 (develop public transport services to support the night-time economy) – this is a TfL role. Boroughs are interested parties in this, due to the potential business development, anti-social behaviour, noise and street cleaning aspects of the night-time economy, but these are functions that sit outside of the LIP.

We strongly question whether Outcome 6 needs to be part of LIP Guidance at all. We are confident all boroughs will report to TfL their facilities that are not working when boroughs are notified themselves; clearly it is more efficient for everyone involved if users report this directly to TfL, and high levels of reporting from boroughs would indicate that TfL is not providing adequate information to users in order for them to do this. We do not feel reporting broken facilities needs to be part of a borough’s LIP and therefore we want to see this section removed.

We want to reiterate that our view is that the Delivery Indicators should be removed from the final Guidance and if this is the case, this above suggestions would be superseded.

Delivery Indicators

The MTS highlights very clearly that TfL lacks funding due to the reduction and ending of its revenue grant from Government. In the same way, boroughs have experienced significant funding challenges over the last ten years which are not expected to abate in the near future. It is therefore more important than ever that Local Implementation Plans are reasonably quick and easy for boroughs to produce; have a purpose and usefulness beyond their initial creation; and quick and easy for TfL to review and confirm their acceptability.

We are therefore deeply concerned by the return to very specific delivery indicators that boroughs must report against. We acknowledge the importance of demonstrating to the Mayor and external

stakeholders the value gained through the delivery of the MTS through boroughs. However, we regularly receive criticism from boroughs that TfL collects the data but boroughs never see it again and are not aware what happens to it. Data collection needs to be highly proportional to the amount of time boroughs have to collect the data; and needs to focus much more heavily on delivering outcomes rather than outputs. We therefore want to see the removal of each set of Delivery Indicators (as they are called in the LIP Key Performance Indicators table on pages 62 and 63) / Borough LIP Delivery Indicators (as they are called in the Outcome Toolkit) from the final LIP Guidance.

We believe it is more than adequate to assess the success of the MTS by measuring the Primary Outcome Indicators (as they are called in the LIP Key Performance Indicators table on pages 62 and 63) / Quantified Outcomes (as they are called in the Outcome Toolkit); as this is a better demonstration of progress towards the overall targets in the MTS. Where these do not exist in the draft MTS, we suggest the Mayor revisits this and includes Primary Outcome Indicators in the final MTS.

Boroughs deliver a considerable amount towards the MTS outcomes entirely outside of the LIP process, for example through planning conditions or developer contributions. We emphasise that boroughs do not have the resources to assess whether these have been delivered in line with planning conditions, but suggest that the GLA considers whether there is a mechanism using the London Plan or the London Development Database where this contribution could be captured.

In terms of Proforma C, we suggest that TfL discusses with London Councils whether there is a role we could play in making better use of the data boroughs provide; for example through sharing of progress or 'nearest neighbour' comparisons.

Data sharing

We strongly welcome the Deputy Mayor's commitment to share data with boroughs to enable better decision-making. In light of this we are underwhelmed by the references to resources being "available on request" in the outcome toolkits for outcomes one and five. We expect to see weblinks to these resources included in the final LIP3 Guidance together with weblinks for the resources that have yet to be published. We are also underwhelmed by the generic 'key contact details' provided throughout the LIP Guidance. As key delivery partners, we expect TfL to be more useful to boroughs than this.

Boroughs have indicated they would welcome an easy-to-use template LIP, as long as it remains optional to use. It would be helpful to understand the timescales referenced in paragraph 2.36 for the "details of committed plans for schemes and programmes that [TfL] will deliver within each borough over the Business Plan period to help inform the third LIP development process". We assume these details will be published by March 2018, when boroughs start to write their third LIPs.

We welcome the outlining of the data owner in Appendix D, and note that as we want to see the Delivery Indicators removed from the final LIP3 Guidance, TfL will become the sole data holder. Given this, we expect TfL to promptly provide this information to boroughs.

Other strategies

We want to see the flexibility for boroughs to submit or refer to their existing transport strategies (or sub-regional strategies) or other strategies where relevant for the delivery of the MTS.

Boroughs who wish to work jointly on strategies (for example traffic reduction strategies) should also be able to do this.

Practicalities of delivery

We note that the LIP process inevitably makes the process of developing and delivering schemes 'lumpy'. Boroughs have expressed their concerns about the ability of LoHAC contractors to take on work during peak periods, and their lack of interest at small-scale projects.

Whilst we support the inclusion of greening, sustainable drainage and schemes that aim to improve the walking environment, we note that these often have higher ongoing maintenance costs, for example due to the use of specialist materials. We want TfL to work closely with boroughs to drive down these costs and ensure that adequate consideration is given for maintenance as part of LIP funding.

The document itself

Making the LIP Guidance shorter

Overall we acknowledge that a lot of the supporting information in the draft LIP3 Guidance is generally consistent with that used for LIP2. We also note that there are sections not included from LIP2 to LIP3 and we do welcome efforts to shorten the document and streamline the approach for boroughs.

However, there are a few areas we wish to highlight that we feel could be reduced.

Paragraphs 2.4 to 2.10 repeat the information already summarised in paragraph 2.3 and that which is given in the MTS. We do not expect boroughs will write their LIPs without reference to the MTS, and this information is superfluous and should be removed from the final LIP guidance. Figure 2.1 and Table 2.1 could also be brought together to make the information more user-friendly. The information provided in paragraph 2.33 is so broad as to be unhelpful (for example, "a large portfolio of projects to encourage more walking and cycling") and we would expect relevant boroughs to already be aware of these major investments planned in their borough. We acknowledge this was the same for LIP2 but suggest it would be more helpful for TfL to provide this information in a bespoke way to the relevant boroughs, perhaps in the form of a data pack.

A note on concepts

We would welcome further checking of the LIP3 Guidance and clarity over 'priorities', 'outcomes' and 'categories'. As we understand it, the Mayor has set out the nine outcomes for his MTS, not 'priorities', and it is these that boroughs need to report against, not 'categories'.

We also want to see the final LIP3 Guidance decide to use one of Delivery Indicators / Borough LIP Delivery Indicators and use it consistently; and the same for Primary Outcome Indicators / Quantified Outcomes. This will avoid confusion.