

# **Response by London Forum of Amenity and Civic Societies to draft Mayor's Transport Strategy (MTS)**

**Compiled by Andrew Bosi, Michael Bach and Peter Eversden**

London Forum is the umbrella group for 130 community groups across the capital and our committees consider how London-wide policy can best be tailored to meet their local aspirations.

We are broadly supportive of the main thrust of the Strategy. We believe that addressing the constructive criticism of the detail will produce a more coherent and consistent document.

## **INTRODUCTION**

London Forum's key points and proposals for the MTS are as follows.

We support the 'Healthy Streets' approach in the MTS and expect to find in the draft Replacement London Plan policies to achieve it, with the usual indications in them of what should be in Local Plans to help achieve the aims and on what basis local planning decisions should be made. Developments that fail to result in Healthy Streets should be refused and the MTS and the London Plan should provide the basis for that.

Car dominance and dependence must be reduced and that is likely to require road pricing in areas and routes where public transport facilities are sufficient. We support the proposals in the Mayor's draft Environment Strategy for road pricing and it should be covered also in the MTS.

We support the policies to reduce air pollution but would like to see the actions required taken sooner than proposed, particularly for removal of diesel vehicles of all types.

There should be more indication of costs for the MTS proposals and links to the TfL Business Plan.

The congestion charge (CC) area should be extended, as it was a contrary to London Plan Policy 6.1 for reducing road travel to remove the western extension of it. The potential income from various extensions of the CC zone should be indicated.

An estimate is required of how long the fares freeze should last. Fares should not be frozen for a long period so that increased costs cannot be covered easily. That is what happened in local government with the freeze on Council Tax rates.

We are concerned about how the pedestrianization of Oxford Street relates to the needs of shoppers who currently use buses.

We do not think enough consideration has been given to the facilities for luggage on buses and Underground trains linking to airports and main line stations.

We want to see strategies for increasing bus usage. **The fall in ridership levels described on MTS page 4 is a serious problem and is likely to have caused a lot of people to use their cars for journeys for which they once found buses acceptable.** Express buses are required on more routes to spread the success of the 607 route.

More transport services are required in areas currently poorly served.

We are keen that cyclists are protected from road danger and given the facilities they need. However, TfL, boroughs and the Police will need to consider how cyclists should be influenced and, if necessary, penalised for riding where they should not and disobeying traffic controls. If this cannot be resolved, cycles should have number plates and their owners will have to register bikes and buy insurance.

Controls over the timing of goods deliveries and waste collection are required. Problems of noise from Tube tracks where concrete sleepers have been installed must be resolved so that people can sleep properly.

We are concerned about the implications of the statement on page 27 that "Insufficient rail and Tube services for central London will constrain future economic growth – a capacity increase of about 80 per cent is required to tackle crowding on today's services and cater for growth between now and 2041."

The intention to provide safe cycling routes for cyclists must be balanced against the adverse impacts on bus patronage, delivery timescales and air pollution from congestion that Cycle Superhighways can cause. Routes that TfL proposes, such as CS9, may seem to provide cyclists with protected use of main roads through town centres but with the removal of some bus lanes, delivery bays and parking facilities. TfL's own documents state that for CS9 "our proposed changes would affect travel times through the area for many people." Alternative parallel CS routes should be considered, such as the A4 for CS9.

There will need to be more policies and penalties to reduce the road congestion and danger caused by the driving of children short distances to schools.

We want to see more controls on the number of private hire and minicabs which are currently increasing at a rate which may be greater than the reduction in the use of private cars. That would frustrate the modal shift aim.

For the future use of driverless vehicles, we would like to see assessment of impact and opportunities and related policies.

We do not believe that it is necessary to spend £80bn tunnelling HS2 into Euston when its interchange with the Elizabeth Line at Old Oak gives fast access to all of the destinations HS2 passengers would need, without overloading the crowded Tube services passing through Euston by bringing most of them into that station.

We strongly support the proposal (77) for local consolidation strategies. This should, however, also be applied to existing (as well as new) developments, and incorporate a process for determining how it is best achieved. Commercial waste collection should be improved to avoid many different companies serving a high street and collecting during peak times.

London Forum does not support Policy 19 and page 197 text referring to creating "high-density" developments. They should refer to creating schemes of optimum density in conformance with the London Plan housing density matrix and its Key Performance Indicator 2.

London Forum objects to the Proposal 91 as it includes the sale of TfL's surplus land. The land should be retained as GLA owned land and developed at existing use values by TfL with developer partners to maximise the delivery of affordable homes as described in the Mayor's Affordable Housing and Viability SPG.

We want to see key performance indicators and milestones in the MTS that are reported annually for their success, for the issues causing under achievement and the actions to be taken to resolve problems.

**Text in red text below indicates London Forum's main comments and suggestions.**

## **CONSULTATION QUESTIONS ON CHAPTER 1 – THE CHALLENGE**

**1) 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.**

The aim of favouring people instead of cars is important as is the associated issue of air quality. We warmly welcome the approach taken by the Mayor with his emphasis on modal shift **throughout** London; the strong accent on air quality, and its highlighting of the whole journey from door to door rather than the journey made by a bus or a train.

Whilst accepting that the population of London will grow **there should be more emphasis on dispersing jobs and homes so that the distances which people have to travel to get to work is minimised.** This is current policy (London Plan, para 6.6) and is achieved by improved interchange to shorten existing journeys, and planning for jobs and homes to be closer to one another and to places with high PTAL values, as part of ensuring good growth.

On page 11 it is stated that people who are cycling pose very little danger to other road users. London Forum does not think that is correct. Many cyclists are not obeying the rules of the road and those cycling on pavements provoke hostility from pedestrians.

**The problems of lack of viable public transport in many parts of London, as described on page 4 of the MTS, are preventing the development of sustainable and successful communities, with densification, and are forcing people to use their cars. London Forum wants to see these deficiencies cleared soon by improved bus or light transit services that connect people to key transport interchanges.**

There should be more 'wayfinding' posts in all areas to point people to where they can reach on foot the nearest bus stop or station.

## **CONSULTATION QUESTIONS ON 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?**

We strongly support the aim, noting that it entails a 50% increase in the number walking, cycling or using public transport.

The vision for mode share improvements is welcomed but **London Forum is concerned about the number of private hire, UBER and minicabs on London's roads.** There must be limits on the numbers allowed to be deployed where it causes extra congestion and air pollution and where transport facilities are good. Such alternative transport services are to be supported in areas of public transport deficiency but must be limited elsewhere.

Transport for London should anticipate in this strategy the effect of the ban on the sale of vehicles using petrol and diesel from 2040 and the take-up of electric vehicles. The latter will require a large number of charging points and **a considerable increase needed in the supply of electricity.**

**The use of driverless vehicles and the opportunity for driverless mini-buses should have comment in this strategy.**

On page 21 there is a comment about freight traffic in the Central London morning peak. London Forum suggests that freight, deliveries and waste collections before 09:30am should be strongly discouraged unless it can be shown that the consequences are more severe than the impact on morning peak hour journey times, but **the strategy has only an aspiration for reduction of peak hour delivery of goods.**

The need for Crossrail 2 is supported but London Forum has concerns about its route and scope. See our response to Q3 below.

To meet the objective of Good Growth (page 25) more attention should be given to improving public transport for areas of Opportunity and Intensification.

One of the biggest challenges appears to be the statement on page 27 that "Insufficient rail and Tube services for central London will constrain future economic growth – a capacity increase of about 80 per cent is required to tackle crowding on today's services and cater for growth between now and 2041.". TfL has indicated at workshops for the MTS that a large amount of that capacity increase is not funded. More clarity is needed on the sums involved, and on potential future sources of investment.

London Forum thinks that Good Growth requires more consideration to place making and public realm design when development occurs. Boroughs and the Mayor will need to consider coordination of individual development applications for the best outcome.

The strategy for "making more use of the Thames" (page 27) is supported strongly but that should be extended to the **movement of materials and freight on the canal system in London, particularly the section that is free of locks west from Paddington.** There is very little mention of water borne transport in the strategy and this must be redressed.

The noise in Inner London mentioned on page 28 applies also to Central London and it is a problem which detracts from enjoyment in walking. There should be priority for these areas, as well as transport corridors of high air pollution for earlier replacement of current buses by hydrogen and electric fuelled ones. A substantial reduction of lorries in the peak periods would also improve streets and encourage people to walk part of their journey.

**The fitting of concrete sleepers has increased noise on the Underground.** TfL has corrected that with rubber buffers in areas around Baker Street station but more needs to be done to resolve the problem in other areas, particularly open track on lines served by the night tube.

London Forum welcomes the proposal for Outer London on page 29 for “mini-radial” services (connecting communities to local town centres)”.

**We support the need for devolution of responsibility to the Mayor for suburban rail in London.**

More tram or similar services should be considered, perhaps above or in the centre of major roads.

London Forum supports there being a good interchange between HS2 and Crossrail 1 at Old Oak (page 32) but does **not support the spending of £80bn on a tunnel for HS2 from there to Euston. It is not necessary and part of that money would contribute to the 80% increase in transport capacity needed in Central London.**

## **CONSULTATION QUESTIONS ON CHAPTER 3 - HEALTHY STREETS AND HEALTHY PEOPLE**

**2)** We support the aim that by 2041 only 20% of trips will be made by privately owned car but we assume that includes hire cars and minicabs.

**3) To support this vision, the strategy proposes to pursue the following further aims:**  
● **by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day**

**We think this is too small a period of time.** We doubt if a series of short walks adding up to 20 minutes would suffice and there should be greater clarity on what is effective as a contribution towards the level of daily activity required to stay healthy.

● **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**

This is ambitious but desirable. However, electric vehicles will make little noise and that might lead to an increase in accidents.

● **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**

This may be unattainable – there will still be particulates from pneumatic tyres etc. and it should refer to ultra low emission.

● **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**

London Forum supports the reduction in lorries and vans in roads at peak times but is concerned that **private higher vehicles and mini-cabs are increasing in number in a way that would fill the road space made available by other traffic reduction policies.**

● **to open Crossrail 2 by 2033.**

There is a strong case for a NE/SW Metro service and it is pleasing to see this orientation referred to in the document. The Evening Standard refers to Crossrail2 as north-south and the alignment currently favoured is indeed north to south. **The route should be determined by reference to existing overcrowding, not the potential for development, which leads to longer distance commuting.**

- **to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor.**

We support this strongly. The transformation of what was Silverlink fully justifies this ambition.

- **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.**

Minimising the distance needed to walk is equally important to making the system accessible to more people. [This refers to the need to reach one's destination, not the need to take exercise]

We support improvements for step free access from street to platform.

- **to apply the principles of good growth.**

That requires more attention in pre-application consultancy with developers, boroughs and communities for creating places people will want to use and ensuring infrastructure is delivered, in accordance with NPPF paragraph 155.

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

We support the proposals from page 26 in the section 'Transforming the transport system – a spatial approach'

The aim is excellent but there needs to be more detail about methods to achieve the 80 per cent target for trips to be on foot or by cycle or public transport. Many of these will be mentioned elsewhere in our response but would include:

- Priority for public transport to achieve faster and more reliable journeys
- Safer and more pleasant walking routes including pedestrianisation schemes which do not conflict with bus use or cycling
- Cycling infrastructure suitable for everyone including children and the elderly
- Beyond London, new links should be those that remove as far as possible the need for Londoners to own a car, rather than schemes like HS2 (page 32).
- More emphasis on safe, comfortable and speedy connectivity between buses and between modes

### **CONSULTATION QUESTIONS ON 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.**

As in our comment on Good Growth above, Healthy Streets, as described on page 40, need more consideration of creating and improving a good public realm and that must be a matter taken into account when dealing with individual planning applications by developers, some of whom do not want

to cooperate on, nor fund, anything outside the boundary of their own site. Design of buildings is important. The use of conditions, S.106 and CIL processes must be improved.

There is also a need (through the planning process) to reduce substantially the partial or complete blockage of roads and pavements during construction activities (e.g. over the last couple of years, outside Cannon Street station). This has happened also in the delivery of modular units for construction in housing schemes.

**There needs to be more detail on how public transport movement can be reconciled with the pedestrianisation of Oxford Street.** People with disabilities, or carrying heavy luggage, may prefer to use the bus rather than tube provided they can do so without changing buses. There is no acknowledgement of the part luggage plays in determining modal choice, or indication of the proportion of travellers for whom it is a serious consideration. If buses and tubes are to carry more bulky luggage and more child buggies it will be at the cost of reducing the maximum number of people on the bus or train.

For people without luggage, the draft MTS under-estimates the distances that can be covered on foot.

For proposal 4 we are concerned that in Outer London, pedestrian crossings are too few. This does not encourage parents to let their children walk to school and fails to secure safe crossing for people with buggies, trolleys or who are elderly. Boroughs should review the requirement.

#### **4a) Focus on buses (pages 60-61).**

The comments below relate also to earlier sections of the MTS for buses.

We welcome the reference to buses having access to places banned to cars, but **there is a worrying lack of detail as to how bus usage is to be increased.** Congestion is undoubtedly the principal issue. Enforcement against parking on Red Routes, as well as introducing a more sensitive road pricing scheme, would help.

The fall in usage of buses (as on page 13) is a challenge TfL must address. Reduction in priority for buses caused by cycle lanes should be assessed critically for the most effective modal emphasis to be applied.

Interchangeability for bus routes needs to be improved as well as at transport hubs (page 23).

Improved and extra bus services in outer London are required to help reduce use of cars. We give strong support to the statement on page 13 that "High-quality public transport services that connect seamlessly to other forms of active and sustainable travel are required across the city" and "space for buses to be properly prioritised" (page 40).

London Forum agrees with the statement on page 26 that "Bus services are also important, and buses must be properly prioritised on key routes to ensure they remain reliable." But it is not clear in the strategy how that will be achieved apart from reducing congestion. **Better control of road works and the times of their operation must be achieved.**

A subsequent GLA report on buses points to the availability of Wi-fi on buses outside London, and on the quality of the journey. This is true, but improving the ability to work on the bus requires space for which large numbers of people or bulky luggage are in competition. Outside London, differently

designed interiors are used for specific routes, but this requires larger fleets. In London, there is far greater pressure on land for bus garages.

The statement on page 31 that "Improved bus routes – particularly services that could replace existing car journeys – will also be vital, and where traditional bus routes are not appropriate, this could include new models for 'demand-responsive' bus services." is supported and **the process for boroughs to bid for investment in such services should be explained.**

**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.**

Road danger may increase if electric and hydrogen fuelled vehicles make little noise and pedestrians and cyclists do not adjust to the need to look around carefully.

Other measures required:

- 20 mph limits should be better enforced. The use of average speed cameras is one method.
- 20mph limits imposed by some Councils on 'B' roads are causing minor congestion and delays. It needs to be understood if vehicles are emitting more pollution when driven below 20mph.
- Speed humps put in before 20mph limits may need to be replaced by smarter means of speed control as they result in more noise and air pollution as drivers brake before them and accelerate after them
- More time for pedestrians to cross at signalled crossings and an end to staggered crossings
- Wide traffic light controlled pedestrian crossings for more capacity in overcrowded places (as at Palestra)
- Better street lighting and enforcement of anti-street clutter policies
- "Minor" offences such as illegal parking give rise to accidents and should be prosecuted
- Cyclists (except children) must be prosecuted for riding on pavements

**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.**

Proposal 12 needs to include measures to tackle acid attacks and the thefts committed by scooter and motorbike drivers. For the latter, London Forum supports Proposal 13.

**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.**

London Forum agrees with the statement on page 70 that "it is essential that these traffic control systems continue to be improved to ensure better outcomes for all road users, including people who

are walking, cycling and using buses.” Eliminating engine idling as far as possible is an efficient means of improving air quality.

We support Proposal 15 and Proposal 16 but **more use could be made for transport of materials by the canal system** to the west of Paddington which has no lock gates.

Proposal 17 for more car clubs in parts of London not well served by public transport has to be explored with boroughs and prioritised as some of them resist making parking space available for such vehicles.

Measures required include:

- Freight deliveries should be managed including timing, consolidation and the banning of large vehicles
- HGVs should be severely curtailed in London in rush hours and at weekends
- Reduce parking on red routes. New business premises should have off-street loading facilities
- The default timing of bus lanes should be 24/7.
- Commercial waste collection should be improved to avoid many different companies serving a high street and collecting during peak times (see proposal 77)
- Drivers should be encouraged by signs to use appropriate alternative routes to congested ones

**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?**

London Forum agrees the need for a road usage scheme and ‘per mile’ charge in congested areas and routes, as on page 82.

**Please also describe any other measures you think should be included.**

Measures required include:

- Congestion charging should be more sophisticated, varying according to the time of day and the distance travelled, **and covering more of London than the central area.**
- Relief from congestion should not be confused with relief from pollution. All vehicles should be subject to the congestion charge or a road pricing system, using the ability to levy different charging rates for more or less polluting vehicles as well as time of day (etc.). Additional measures should be used to encourage non-polluting or discourage polluting vehicles  
The numbers of PHVs should be reduced and drivers’ conditions should be regulated

**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.**

Ultimately we should be working towards a national road charging scheme but in the meantime we should encourage local authorities (particularly those bordering Greater London) to develop their own. There must be strong policy leadership and support by the GLA for this, as it could be a problem if Councillors did not want to be unpopular by introducing such schemes. Part of LIP funding should be ring-fenced for that purpose to meet the aims of Policies 20 and 21 and the objectives on pages 84 and 85.

**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?**

In the same way that the Government fails to give enough attention to reducing particulates, there is a lack of emphasis on this in the MTS. It is mentioned on page 92 as not meeting safe levels but Proposal 34 is not sufficient to address the problem and Proposals 36, 37 and 40 are for specific forms of transport producing particulates.

**Please also describe any other measures you think should be included.**

- The move towards ULEZ is not before time but is perhaps not ambitious enough.
- The development of batteries is proceeding at such a rate that it will probably be possible to ban all fossil-fuelled vehicles before 2037 and plans should be made accordingly.
- It is also necessary to take into account the development of autonomous vehicles.
- There is no mention of air traffic. City Airport is a source of pollution and should be closed; Heathrow expansion should be resisted.
- The control of river traffic should be devolved to the mayor.
- There should be a tight time scale for the elimination of diesel powered vehicles accompanied by a diesel scrappage scheme not dependent on the recipient buying a new car.
- There should be some commentary on the changes since the first London Plan (page 163) – mainly to outer London
- The reference to electrified railway lines should include a requirement that electric trains run under the wires
- Energy efficiency should be associated with lower noise levels

**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.**

We support the night tube, but the noise generated by the night tube needs to be mitigated. Ambient noise levels are lower at night so that noise nuisance is greatest at the times it is most intrusive. As we have commented above, the introduction of concrete rail sleepers has caused more noise and mitigation methods have been applied only where complaints have been high or legal action was proposed. There should be a policy to deal with the problem and to use noise buffering between track rails and the metal of all bridges.

Old buses used on some routes cause a lot of noise for residents in narrow roads and that should increase the priority for their replacement. The E3 bus route is one example.

## **CONSULTATION QUESTIONS ON 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.**

The Healthy Streets approach must apply to all new development and not just the parts covered by Policy 9 and Proposal 48. The Mayor, Transport for London and boroughs will need to consider the place making and public realm appearance in areas of Opportunity, Intensification and Regeneration. Also, developments in all areas should be designed to create good public space and permeability.

There is a tension between pedestrianisation and connectivity. The redevelopment at Archway has resulted in improved pedestrian space but a loss of connectivity between tube and buses and between buses and buses as bus stops have been scattered. Connectivity would have been improved if buses had been allowed in the space outside the tube station and traffic removed from the other side of the square instead. We support the removal of gyratory systems but only if bus interchange is given first priority.

**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.**

We do not need mobile phone access underground. Already too many people cause pedestrian congestion through being distracted by hand held devices and thus oblivious to the people around them. There are as many arguments against as there are in favour, and it would thus be a very poor use of scarce funds.

**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?**

London Forum supports the implementation ‘NOW’ of improved social needs transport as in Figure 17.

The upgrade of the Piccadilly Line is shown as 2025 onwards and seems to be later in each transport publication. Reliability on the line is not good and the new signalling is needed to restore the stopping of Piccadilly Line trains at the Turnham Green interchange station. **The timescale should be examined and brought forward.**

**Crossrail 2 will be required earlier than some time in the 2030s.**

**Please also describe any other measures you think should be included.**

- Provide improved accessibility training for bus drivers and ensure new buses provide better accessibility for all users.
  - There should be more emphasis on ultra-local routes, particularly for older people, with small buses able to navigate narrow streets serving such destinations as shopping centres, libraries and hospitals. An example is Islington’s route 812. These could also be particularly relevant to hilly areas, where, for example, people who are happy to carry modest amounts of shopping on foot, find it too difficult when walking up hill.
- Demand responsive transport also has a place. An extension of the operation of Dial-a-ride could be considered.

- Many people not perceived as disabled people are not able to access rail or tube and will continue to be reliant on buses after the Elizabeth line opens
- Where boroughs have implemented the kerb build-outs at bus stands for easy deployment of wheelchair ramps, the bus shelter should be moved closer to the extended pavement edge to give more room to pedestrians walking behind the shelter
- Where pavements are narrow, bus shelters should not have end panels and should be placed at the rear of the walkway

**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.**

- There need to be targets for bus service improvement in terms of journey time, usage and reliability.
- Bolder bus priority measures are required including extended bus lanes operating 24/7.
- There needs to be more emphasis on orbital routes in outer London including express routes.
- **Proposal 54 should include avoidance of reduction in bus priority and increase in travel times by cycle lane implementation**
- More effort is required to minimise disruption of bus routes because of local construction activity.
- **Policy 13 does not go far enough: there should be a reference to orbital bus routes**

**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.**

- We strongly support TfL taking control of London suburban rail services. There is a need for relief from congestion in many places, between different suburban rail routes such as at Lewisham and between local and long-distance services such as at Herne Hill. In the long run plans should be put in place to deal with these issues by tunnelling.
- Crossrail 2 is important for the relief of overcrowding in south-west London and in providing transport for new developments in the Lea Valley. Funding however appears at the moment to be problematic. If this becomes insuperable **consideration should be given to rethinking the scheme as a tube line to relieve overcrowding in the Hackney-Chelsea corridor rather than as a heavy rail system serving the outer suburbs.**
- Mention is made of extending the Elizabeth Line beyond Abbey Wood but westward extension to the West Coast Main Line or the Chiltern Line should also be advocated.
- Tram and light rail systems answer a lot of questions about congestion, speed and controlling pollution. New lines should be advocated in addition to the Sutton extension. As a minimum Tramlink should be extended to Crystal Palace. **The use of orbital rail corridors such as the Dudding Hill line should also be advocated.**
- Figure 20 needs to be clarified to make it clear whether the journey times quoted are to the nearest point within the CAZ or to any destination within it.
- Prolonged disruption to bus services has forced people on to the tube despite severe overcrowding and the Mayor needs a strategy to win them back

- There should be a proposal for the best configuration of lines and stations at Old Oak, particularly for HS2 and Crossrail 1 interchange. Proposal 71 should be improved for that purpose

**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.**

We agree with most of the Mayor's plans, but any new river services, including cruise liners, must be low emission. **We do not agree with proposal 71.** HS2 and the associated change to Crossrail2 destroy affordable homes in the area where they are most needed. Affordable housing in Old Oak Common is needed in addition to existing, not as a replacement. Extending commuter distances smacks of the failed "predict and provide" roads policy of past governments. We support policy 19 but **without some revision of proposal 71 the MTS is advocating inappropriate growth on top of good growth.**

We are surprised that there is no mention of the Bank branch having a night tube service. Whereas twenty years ago there would have been some logic to this, Shoreditch is now a major focus of the night time economy. **It is extraordinary that Old Street and Angel have no night tube.**

The Mayor should consider if it is necessary and best value to tunnel HS2 from Old Oak to Euston (page 181 and Proposal 71). Crossrail would convey passengers to any interchange point they would require with other transport services and they would not all want to arrive in Euston. The £8BN saved if that tunnel is not built would fund Crossrail 2 and other transport improvements in Northern England

## **CONSULTATION QUESTIONS ON 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.**

It is vital that public transport, cycling and walking provision is planned alongside the plans for housing so that new residents can see that there are alternatives to having a car before they move in.

We strongly support the proposal (77) for local consolidation strategies. This should, however, also be applied to existing (as well as new) developments, and incorporate a process for determining how it is best achieved. Commercial waste collection should be improved to avoid many different companies serving a high street and collecting during peak times.

**New housing developments in areas of good PTAL should have conditions imposed that occupiers should not be allowed to buy Controlled Parking Zone permits for use in local streets and the number of parking spaces on site should be limited to ones for disabled people and for cycles.**

Policy 19 and page 197 refer to creating “high-density” developments but they should refer to creating schemes of optimum density in conformance with the London Plan housing density matrix and its Key Performance Indicator 2.

**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.**

There should be a presumption against new roads which encourage car journeys, unless supported by a charging system which can guarantee that there will be no increase in traffic. This includes the Silvertown Tunnel. There might however be a case for decking over junctions, such as the A13 junction in Barking, as in Proposal 93, which would free land from pollution, noise and congestion and make it available for other uses such as housing or parks.

The tunnelling of the A4 underneath Hammersmith to replace the flyover should be considered for the same reasons. It had outline approval by the last Mayor and TfL.

We are pleased to read the reference to good interchanges as part of developing Opportunity Areas – “Dedicated public transport and walking and cycling provision should be at their heart” (page 203).

We feel that the emphasis of CrossRail2 has swung too far from the original objective of relieving severe overcrowding to unlocking the potential for homes. Because no new lines were built between 1906 and 1968 there is an overwhelming need to address the former. Proposal 83 should have higher priority than Proposal 82. We need to be assured that road crossings (proposal 90) will not compromise the objective of modal shift. Surplus land can suddenly become land required for public transport as a result of actions of third parties and great care needs to be exercised before land is sold – ask the residents of Mexborough.

Proposal 83 for a rail service from Hounslow through Old Oak to Cricklewood needs more explanation of benefits, cost analysis and their priority in the list of other transport initiatives.

London Forum objects to the Proposal 91 as it includes the sale of TfL’s surplus land. The land should be retained as GLA owned land and developed at existing use values by TfL with developer partners to maximise the delivery of affordable homes as described in the Mayor’s Affordable Housing and Viability SPG.

Proposal 93 should be extended to examine the feasibility of tunnelling the A4 under Hammersmith to replace the flyover and to provide development land and reduce blight, noise and pollution.

**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?**

Heathrow is the wrong place to put an airport but this cannot be changed. However it is right to oppose its extension. Unacceptable pollution levels arise not only from aircraft but from surface transport accessing the airport. The displacement of a large number of people who would lose their homes if a third runway is built is unacceptable.

The growth of air-borne freight at Heathrow and the vehicle movements for it are additional considerations.

City Airport also suffers from the same problems and this should be considered carefully.

To reduce car and taxi movements related to Heathrow airport, there could be an exit toll for such vehicles of perhaps £30. Passengers would then be dropped or picked up by friends or taxis at suitable stations instead of being driven to or collected from Heathrow terminals.

## **CONSULTATION QUESTIONS ON 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?**

Policy 21 and associated proposals are worrying because they do not provide believable solutions to the growth of private hire vehicles and the kerb space and road space that they occupy - page 257: "At the moment, it is not yet clear which precise measures will be needed to manage these new services over the full course of the strategy to 2041."

On page 260 it is stated that "They should not undermine TfL's ability to deliver any of the aims of this strategy, impact on its network management duties or cause additional congestion, particularly in central and inner London." London Forum shares that concern and wants to see policies to prevent such adverse effects.

Section b of the policy states that such services "should also provide a means of travel in areas where public transport connectivity is currently poor (especially in outer London)." However, there is no policy to restrict them to those areas nor to restrict the number of mini-cabs.

The policy states that "new services should help more people who would otherwise complete their journey by car to access the public transport network". However, mini-cabs offer convenience and there is little incentive except price to influence a passenger to use such services only to reach a station. They could walk to a bus stop which would take them to a station but those who can afford to hire a mini-cab, particularly if several people ride together, are unlikely to do so.

There should be road user charging for mini-cabs and PHVs.

We support the proposal for mini-cabs to share data on their journeys (Policy 21 f) to plan future TfL transport services that would meet an apparent need.

We wish to see full implementation at bus stops of Countdown (Proposal 97).

There should be more convenient connections between bus, Tube and Rail services and some bus stops have been moved too far away from interchange points.

We agree strongly with Proposal 99 for TfL to explore and trial demand-responsive 'bus' services of their own to complement 'conventional' public transport.

Connected and autonomous vehicles will bring new challenges. One problem could be vehicles driving empty. Proposals 100 and 101 suggest GLA participation in trials and working with Government to optimise the benefits and manage problems. We look forward to the outcome of the investigations and the policies that will have to be applied.

**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?**

We agree with the statement on page 265 that "Without adequate funding, quality of life, health and social integration are at risk, and there will be damage to London's economic growth, ability to deliver new housing and resilience to climate change." The Proposal 22 for devolution by Government to the GLA for a more stable funding environment was proposed years ago by the Finance Commission, chaired by London Forum's Patron, Professor Tony Travers of the LSE, but has been ignored by Government. We look forward to the outcome of the joint task force for DRAM now established.

We support the recognition on that page of road user charging as a future controlling mechanism and income source.

**We object to the inclusion of advertising for 'Funding the strategy' on page 266. The electronic billboards on the TLRN have degraded the public realm, deterred walking and introduced distraction for drivers, cyclists and those walking which reduces safety on those roads. The use of advertising by TfL, by boroughs on bus shelters and by 'telephone' companies on walkways is contrary to the policies for Healthy Streets.**

London Forum supports the Mayor's call in Proposal 102 for Vehicle Excise Duty to be devolved to TfL.

There should be a more pro-active approach to methods of securing contributions from property owners, the value of whose property is uplifted by transport improvements, as on page 268.

It should be made clear in the bullet points on page 266 that road use pricing will be a future policy and a source of income for TfL.

There seems to be no mention of transport CIL beyond the Elizabeth Line, yet one is to be introduced for CR2.

The Implementation Plan in Figure 55 shows the Deep Tube Programme now many years later than in earlier plans. Consideration should be given to bringing forward the upgrade of the Piccadilly Line which shows unacceptable reliability levels and capacity problems as the passengers to and from Heathrow airport increase with the use of larger aircraft.

We welcome the proposal in Figure 55 for more street trees but they must be of a broad leaved variety for dealing with air pollution and for climate change. The boroughs wish to plant small trees that have a small amount of leaf fall but that should not be allowed by Mayoral policy.

The ULEZ for Inner London should be implemented earlier than indicated.

Under 'River' there should be a milestone for introducing freight services on London's canal system, particularly the Paddington arm which was designed to have no locks. The canals should be used for movement of waste, demolition materials, construction materials and other goods.

There should be a milestone for extending the Congestion Charge Zone.

**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?**

TfL should use the LIP Guidance and its response to each Borough's LIP proposals in order more forcefully to secure Borough compliance. The result should appear in TfL annual monitoring reports. There should be monitoring to ensure that LIP funds are spent in the way agreed with TfL and that is required in Proposal 103.

All boroughs should have policies for reducing motor traffic and for increasing the width and number of pedestrian crossings.

They should be encouraged to seek implementation of signed pathways between streets and through new developments to transport nodes which would reduce walking distances and encourage active travel.

Figure 57 indicates a considerable increase in trips in East London, presumably arising from new development which emphasises our earlier point that developer contributions to transport should be sought.

The large reduction shown in Figure 57 in the use of car/taxi/PHV in the West of London from 45% in 2015 to 20% in 2041 and East of London from 30% to 10% need explanation for the trips across Inner/Outer/Beyond. The mode share trends will need to be reported for policy review purposes.

A survey should be conducted by TfL across London to ask residents what would make them give up their use of a car.

There should be an assessment of the degree if any of severe transport overcrowding that will be experienced still in 2041 (figure 58).

The aim in that figure for people to feel safe and secure when walking will depend upon zero tolerance to knife crime, acid attacks and the snatching of mobile phones and other possessions.

We strongly support Proposal 103 for borough monitoring plans supported by TfL.

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

It is not clear which Key Performance Indicators will be used and reported upon to ensure clarity of progress on improved service delivery, mode share changes and other expected outcomes.

The use of permeable tarmac to reduce noise, glare, rainwater spray and particulates has been reported by other countries as a successful method of improving road safety, wear and air quality. **The Mayor's MTS should have some content on that subject.**