

Mayor's draft Transport Strategy

Response by Just Space

2 October 2017

Just Space is a self-help community-led network of voluntary and action groups from across London. We aim to influence plan-making and planning policy to ensure public debate on crucial issues of social justice and economic and environmental sustainability.

The response is mainly derived from Just Space's publication [Towards a Community-Led Plan for London](#) which contains policy directions and proposals for the planning of London. This was the product of some 85 groups discussing issues at 3 open door conferences and follow up workshops to refine the text.

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 relationship of this strategy with other Mayoral strategies, in particular the London Plan, is also discussed in the concluding remarks to this questionnaire. (See Q24 Process/next steps comments below). This is a challenge in itself to get this right. London's population is predicted to increase considerably, but the London Plan has not been doing enough to reduce the need for people to travel and to maximize uptake of walking and cycling before bringing forward mega transport projects. It is even pursuing new roads and river crossings for vehicles, which would add to the problems of traffic congestion and pollution, without non-road alternatives being properly considered. Poor attention has been given to social and environmental factors, such as carbon emission targets, air quality, public transport fares and local employment. The London Plan and the Mayoral Transport Strategy need binding policies to bring essential changes in our transport habits.

This is not simply an institutional challenge that can be resolved through closer attention to proper processes, but requires a substantial change to the present visioning of London's future (and the setting of objectives) from one of a 'global city'. (Continued below at Q2).

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?

As expressed in such terms above, the Vision is admirable. But the delivery of this is very much dependent on appropriately resourced and nuanced policies and proposals and requires a substantial change from the present visioning of London's future as a 'global city'. to one that embraces a new geography and imagination for

London: one underpinned by inclusive growth, fairness and diversity of people, businesses and places; more balanced and polycentric, with Lifetime Neighbourhoods and Lifetime Suburbs; therefore, avoiding reliance on the Central activities Zone/Isle of Dogs, high-order Town Centres and on a small number of economic sectors. (For further elaboration see Appendix 1: Proposal for a Community Generated Spatial Option).

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
- 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.

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

These 'aims' are not explicitly brought together in such a format in the text. It would add clarity and purpose to the MTS if they were so marshalled together. They then can inform and be informed by the monitoring process which itself is disconnected from the strategy document. (See Q23 comments below). Note that these 'aims' are largely targets or milestones. It is standard practice for strategies to translate their visions into objectives and thence to policies and proposals. Just Space in its Towards a Community-Led Plan for London publication set out, among many other ones, transport objectives that this network asks should set the framework for transport planning. To serve as examples, they are attached as Appendix 2: Transport Objectives.

'Good Growth' is a rather nebulous concept whose definition and attributes lack precision, and are capable of wide ranging interpretation and application. Evaluation and monitoring, consequently, will be problematical. This together with Policy 19 [p193] pre-empts the proper plan-making process for the new London Plan. (See Q24 Process/next steps comments below).

Inner London: when read with other parts of the strategy, particularly through the application of 'Good Growth' and Chapter 5, this will inevitably lead to an Inner London no longer suitable for families. (See also Q18 comments below).

Outer London needs lifetime suburbs - mixed communities of jobs and homes with everyday facilities & services - to scale up lifetime neighbourhoods going beyond the small planning unit of the neighbourhood - with flourishing town centres. There

needs to be a real mixed development strategy for Outer London that the MTS supports. This would reduce the need for travel, the length of travel, and overdependence on the centre of London (Central Activities Zone) by a greater share of economic opportunity, jobs and homes. However, a caution should be stated: that the 'High Street', industrial and transport lands need to be protected to ensure the proper functioning of London including its local/real economy, .

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.

4a) Focus on buses (pages 60-61). See Q15 comments below)

Planning should start with reducing the need to travel and to promote active travel, namely, walking, cycling and public transport – sustainable modes of travel. This requires greater attention to facilitating walking and mainstreaming cycling. The benefits include those for health, the environment and tackling congestion. Cars and HGVs (Heavy Goods Vehicles) are a dominating influence on London whereas car sharing, cycling and walking are liberating. Amenity, the environment and users should not be subordinated to the demands of road traffic, but should be enhanced by appropriate levels of connectivity with the emphasis on the sustainable modes of travel. Reallocation of road space between users would ensure fairer share of space for cyclists, buses, pedestrians and public realm. The aim should be to achieve liveable attractive places and spaces for all parts of London, not simply the iconic destinations, such as Oxford Street, and for all, including, for example, children, not just active adults.

The emphasis on cycling , admirable as that may be, leads to a lack of attention on those who are unable to cycle or even to walk further or more frequently because of age, infirmity, disability – temporary or enduring – or because of personal duties such as caring for small children. The roll out of walkable attractive routes, places and spaces for all parts of London that put walking first should have good connectivity with public transport.

Current proposals, such as the cycle super highways, quiet ways and Mini – Hollands (cycle friendly low traffic areas) have yet to demonstrate critical mass take off. Cycling network should be comprehensive (fine grained) and segregated covering all cycling needs and potentials, and not only super cycle highways, which are very high level. The ambition should be to achieve a take-off in everyday 'civilised continental style' cycling. Therefore, the policy and proposals should be to 'normalise' or 'mainstream' cycling as the mode of choice, avoiding numerical targets, but requiring a transformational implementation strategy that progressively builds up the modal share for cycling. However, that said, the current 3 mini-Hollands for Outer London only have 20% of trips as their rather unambitious target. Nevertheless mini – Hollands should be brought in for all 32 Boroughs, the City and Mayoral Development Corporations.

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.

The intentions here to strive to reduce road danger and improve personal safety and security are commendable. But see the comments below to Policy 3. Also there are issues of safety around pavement cycling and the disregard of traffic regulations, shared surfaces and 'floating bus stops' which are separated from main pavements by cycle lanes. These all present hazards to pedestrians, particularly to the younger, older, disabled, and less agile members of the population. (See comments made at MTS Communities Workshop, 10 August 2017). A wider adoption of 20mph speed limits is supported.

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.

Feeling safe on public transport and in the streets is crucial, particularly for the more vulnerable members of society. An important component of a secure environment, as promised by Policy 3 [p68], is the presence of staff, as well as the specialised policing, on public transport. This should be added to Policy 3 as a commitment to and in recognition of this function of staff. The recent reducing of staffing levels at stations was a retrogressive step. Policing of the streets through the Safer Neighbourhood Teams are important. Since the Mayor's Police and Crime Strategy has already been finalised, this will need to be revisited, to ensure that the MTS proposals are aligned, integrated and adequately resourced.

It is heartening that in this technical and high level strategy that the especially vulnerable and rough sleepers are referenced in Proposal 12b [p69], and TfL is encouraged to implement the promised improvements.

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.

The promotion of an integrated approach to freight together with enhanced water transport should be both a strategic aim and incorporated into Policy 4 [p70]. Freight and delivery vehicles in particular have been increasing their number of trips and are expected to so continue unless proactively managed. Rationalisation is needed. There should be a network of consolidation hubs and managed distribution for the final leg of delivery. Wide area wide restrictions on goods vehicles (other than permit holders) would direct freight into consolidation freight hubs which would manage and rationalize distribution. The proposition for a surcharge/levy on central London business deliveries could assist reducing congestion.

Shift road freight to rivers and canals by implementing the Blue Ribbon Network and enhance water transport opportunities, facilities and services. Operational facilities for water transport are to a degree have policy protection through the existing London Plan 2015 (see policies 6.2 & 7.26), but satisfactory adherence to these is contested by developers etc. On the waterways there should be (more) multi-stop, fast ferry services, with TfL providing more resources for water transport (existing fare structure and waiting times are a barrier). Crossing the Thames by ferries has more merit than building more bridges, even if they are walking and cycling bridges.

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.

This should be expressed in policy and not simply a proposal. Road user charging, London wide, would change travel behaviour, may make streets more pleasant places, and tackle congestion and pollution. (It is still in the current London Plan 2015 - para 6.39A). It would need to be applied in an equitable and proportionate way and could operate in a variety of ways, such as higher charges during peak periods or for certain vehicle types etc. Acceptance may prove problematical over, for example, privacy issues, but the Mayor should commit to developing these schemes rather than simply "considering" as per Proposal 19 [p83]. With traffic reduction, this would create a fairer share of space for cyclists and buses, and the revenue raised used to support sufficient, reliable, safe, affordable and accessible public transport.

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.

Road Traffic Reduction Target Setting should be part of policy and not just the expressing of support in Proposal 20 [p83]. Target setting would provide benchmarks to measure progress, determine the need to strengthen or further resource implementation and require other agencies and authorities to fulfil their responsibilities in delivering an integrated transport strategy.

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.

An important driver of this transport strategy should be to meet air quality targets. The greater emphasis on cleaner streets is supported, but one that satisfies the Supreme Court's judgement that this should be as soon as possible. This requires greater regulation and restriction of vehicular traffic not only in Central London, but elsewhere. A London-wide Ultra Low Emission Zone (ULEZ) out to the M25 /GLA boundary should be a priority. Targets should be based on the more stretching and public health benefitting WHO limits. Among other measures, this will require the

phasing out and ultimate banning of all diesel (including buses and water transport) in a sooner time frame than the planned 2040. Going along with these policies and proposals are strong road traffic reduction targets, fewer and cleaner vehicles, and implementing London wide road user charging. Through planning and the new London Plan traffic generating transport and development schemes should be actively avoided. The need to travel can be reduced by planning mechanisms that support local employment and services.

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.

Climate change remains an issue even if the air quality crisis is solved. An implementation strategy setting out the measures that are eventually determined to be necessary to fulfil the policies and proposals is essential. The route map to achieve London as a zero carbon city by 2050 has yet to be determined and the present London Plan 2015 is unclear as to the mechanisms that will result in compliance with the prescribed carbon reduction targets towards the latter part of its plan period.

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.

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.

There is an important social dimension to transport, which, if it is to effectively contribute to proper planning of London and the achievement of sustainable development, should address affordability and accessibility. These are often of great concern. All elements of public transport should be planned and operated in an integrative way with fare structures, tariffs and facilities that enable all to readily access those services most appropriate to use. The report, "Living on the Edge" by London Councils et al, Dec 2015 revealed that low paid workers are disproportionately affected by rising transport costs. The cost of changing between bus and train can be relatively expensive – in a sense a double charge, making longer

multi-modal trips unaffordable. Having a single transport operator within London would assist fare equalisation. The persistence and prevalence of low wage employment often means long and unsocial hours of work. Adding time consuming commuting to this 'life of work' as a consequence of having to use less expensive but longer time-wise travel options is detrimental to well-being. So too is the kind of spatial organising or planning of London that deliberately distances places of work from homes etc..

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.

The present access upgrade programme is lamentable. Accessibility, where provided, stops at the platform edge with a gulf between that and the train. (See comments made at MTS Communities Workshop, 10 August 2017). If you cannot use the stairs/steps, then a glance at a step-free tube map reveals that much of central London is inaccessible to you. And the 5 yearly performance of delivering step-free tube stations will decline over time according to Figure 17 [p130-131]:
2020-24 25; 2025-29 15; 2030-39 15.

Given the size of the Network Rail and Overground networks, Figure 17's one or two step upgrades per annum is disappointingly slow and will make only marginal improvements to accessibility over time. N.B. Figure 17 could with advantage be redrawn to make clear how many of the step free tube stations that are promised will be upgrades of existing stations and how many will be new stations on the Elizabeth line, Bakerloo Extension etc.

Denial of the ability to independently live and travel worsens the health and well-being of those with access issues. Until all bus stops, all taxi ranks, all rail stations and all tube stations are fully accessible this is not A City for All Londoners. Londoners do not have a vision of full accessibility even by 2041. Policy 12 [p127] "will seek" - if anywhere, it is here in this policy that this un-emphatic verb should be discarded in favour of much more purposeful wording that truly conveys action and implementation. To be meaningful, this policy should have an ambitious and challenging time target of achieving full accessibility, say, within 2 terms of the Mayor.

The "social needs transport review" of community transport is needed given the likely increased demands that will be placed on it as the elderly population grows in numbers and the service is faced with funding difficulties. It may be that demand-responsive bus services would be particularly appropriate – see comment below for Proposal 99 [p260].

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.

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.

London's predicted population growth will sustain improved levels of service and patronage. This will make feasible the intensifying and extending bus services coupled with the creation of Outer London Orbital Rail and long distance limited stop bus services. Bus reliability is a good objective to help a significant number of Londoners who depend on the buses, but too much of the proposal relies on a reduction of traffic congestion to increase bus efficiency. Specific implementation proposals could include more segregated and continuous bus routes to overcome congestion delay, particularly in the light of growing distributed delivery services (e.g. Amazon) and private hire (e.g. Uber) which may well adversely affect congestion levels. London's Transport Strategy needs to ensure that bus and rail services are closely integrated and linked and connect with transport for the wider South East region.

Within an aim of the strategy to plan and make the transport system work better, a suite of measures, mostly small-scale, but targeted to achieve in an incremental way a denser coherent and convenient travel network should be set out. In this way of more and improved interchanges the progress to seamless journeys can be accomplished. (See Q19 comments below). The answer is not to build more 'Crossrails' whose funding is not assured and if funded would starve other proposals of scarce capital investment. Supporting the bus network would reap better returns.

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.

On the waterways there should be (more) multi-stop, fast ferry services, with TfL providing more resources for water transport (existing fare structure and waiting times are a barrier). Crossing the Thames by ferries has more merit than building more bridges, even if they are walking and cycling bridges.

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.

Policy 19 [p193] pre-empts the proper plan-making process for the new London Plan. (See Q24 Process/next steps comments below).

Densification of development at and around stations through Proposal 75 [p198] has, is and would generate typically speculative, formulaic 'luxury apartments' that do not meet local need in terms of affordability, tenure unit sizes or amenities. It neither creates life time neighbourhoods (London Plan policy) or sustainable development (national planning policy), but act as agents of change that disrupt

and displace settled communities and are likely to lead to increased travel, both quanta and distance. And by occupying scarce sites such developments deprive localities of the opportunities for more carefully curated development attuned to their physical, economic and social fabric.

There are international examples that may usefully inform the strategy if used with care. Transit Oriented Developments (TODs) are planned integrations of neighbourhood service and employment hubs around rapid transit stations together with higher density development that has low levels of car usage. Tokyo's railway station areas can be seen as good practice. Across a wider scale, Malmo's Comprehensive Plan 2014 plans growth in urban multi-function concentrations around public transport nodes. Existing London Plan policy using the Public Transport Accessibility Level (PTAL) matrix promotes transit adjacent development, namely higher density development, but without the full realization of the sustainable development benefits of TODs. There is a need to challenge the current use of PTAL for density studies with new more sensitive assessments that analyse transport connectivity to, for example, employment opportunities, door to door accessibility, factoring in ease of travel etc. However, this must not be at the expense of retaining and creating sustainable communities. Any policy or proposal of the MTS must be situated within appropriate policies of the new London Plan that prioritise social sustainability - strong and inclusive communities, recognising the value of existing local economies, delivering the homes that Londoners need and so forth. Any policy or proposal of the MTS should not pre-empt the proper plan-making process of the new London Plan.

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.

Planning London's transport system inevitably identifies a catalogue of generic programmes and specific projects. These should be designed to make the system work better. For example, by promoting the exploitation of counter direction radial route capacity; the creation of interchanges to enable a wider range of destinations; and recognising air quality as a fundamental determinant of policy and practice. Any/all proposals should be 'future proof' by ensuring their passive potential for further adaptability and extension/expansion/integration. All project options should be open to debate and their impact assessments available for scrutiny to ensure user consideration and suitability for local communities. A suite of measures, mostly small-scale, but targeted to achieve in an incremental way a denser coherent and convenient travel network should be the output of a MTS that recognises its funding limitations. (See Q22 comments below).

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?

The funding of extensive transport measures to support any intensification of activities at Heathrow airport should be by the owner developer, Heathrow PLC and

not the public exchequer as presently stated in Proposal 96. Any public monies should be used to support appropriate capital investment elsewhere in London. Policy 20 would be more widely relevant if it referred to intensification as well as expansion.

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?

“Whether a vehicle is shared or privately owned makes no difference to the amount of street space it takes up” (see Fig.52–53) [p256]. Whilst this may be correct for vehicles on the move, it could be that widespread adoption of sharing would reduce on street parking, improve the street scene and create space for the Healthy Streets Approach. The MTS should commit to further research on how exactly to well manage new services [p257 & p259], to make this explicit and to be more supportive of sharing in preference to private ownership in Policy 21 and Proposal 98. This would align better with the principles of a Circular and Sharing Economy which are likely to figure prominently in the London Environmental Strategy, the new London Plan and possibly, the Economic Development Strategy.

Demand-responsive bus services would be particularly appropriate for those with disabilities or older persons, for example, having to attend medical appointments, luncheon clubs etc. from/at widely dispersed origins and destinations where conventional bus routes are relatively coarse-grained. This should be recognised in the text relating to Proposal 99 [p260] and actively promoted to remedy the ‘accessibility deficit’ endured by a growing sector of the population. (See MTS Supporting Evidence: 2011-2041 GLA population change +28%, but for those over 70 years old, +85%). Also should be linked to/from “Improving Public Transport Accessibility’s” Policy 12 and Proposals 51 & 52 [pp127-129] as another potentially important mechanism.

Connected and autonomous (C&A) vehicles: It is imperative that C&A vehicles adapt to the street environment which is set to improve through the Healthy Streets Approach and that the street environment is not adapted to meet the technical requirements of C&A vehicles.

Professor Helmut Holzapfel (consultant to Mercedes Benz) in “Will future transportation technologies solve our transport problems?” seminar, 18th May 2017, UCL, predicted that vehicle manufacturers would seek to have street environments simplified and other road users more closely regulated or corralled. That C&A vehicles are not only fit for purpose but fit for our streets needs to be more emphatically expressed in Proposals 100 & 101 [pp261-262].

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?

This draft does not provide evidence to give clarity and certainty on how transport infrastructure will actually be delivered and as well not comprising the delivery of other kinds of infrastructure that London presently needs, and increasingly in the future will need; such as affordable housing, utilities, and the various essential facilities underpinning the social, environmental and economic fabric – schools, health centres, parks etc. Much of the strategy’s realisation is predicated on the precarious premise that the Mayor will acquire new powers, particularly financial ones (Policy 22) [p265]. It is also dependent on the willing collaboration of the boroughs.

The cost of the strategy is estimated at some £82 billion unadjusted for inflation etc. (25 years at £3.3bn pa), whilst the funding gap between this and known income streams is not estimated. However, it is advanced on the basis that this capital investment would represent three-quarters of the National Infrastructure Commission’s recommendation for spending on economic infrastructure. But this represents the lion’s share, if ever such sums became available, and would inevitably deny the meeting of other extensive demands for long term infrastructural renewal as set out in the London Infrastructure Plan 2050. There are apart from transport other priorities for essential infrastructure to remedy existing deficiencies and provide for predicted future population and economic growth. The MTS should be realistic about the resources likely to be available and formulate its proposals and programmes /Implementation Plan accordingly. The Mayor shall have regard to, among other things, the resources available for implementation of the strategy (GLA Act 1999 Section 41(5)). As it stands, the plan is not deliverable as it does not have a coherent financial plan.

As for funding, this draft simply lists various income streams and speculative financial tools and powers, without detailing how they will be applied in an appropriate mix and scale to deliver the envisaged capital investment that will in turn also place additional demands on revenue spending; their feasibility and practicality are not adequately discussed. There is no objective evidence to indicate how a funding gap will be met, as suggested sources are increasingly to be drawn on for council core budgets and possibly not available (e.g. business rates; borrowing against future business rates). CIL only makes a marginal contribution (£300 million to £16billion Crossrail) and increasing the levy rates would adversely impact on development ‘viability’ and planning benefits, especially affordable housing. Tax Increment Financing (TIF) – to borrow off the back of predicted future revenue returns - would mean mortgaging the future, to be covered by future generations of tax payers. The capacity to sustain this level of borrowing is unpredictable and imprudent in the face of multiple uncertainties regarding the UK and London economies, as well as additional debt burdens already accruing to the Mayor associated with developments across London (such as Vauxhall Nine Elms presently and maybe at Old Oak in the near future). TfL has reported to the London Assembly recently that there is a current dispute over who should pay for £240million for station design changes at Battersea Station on the Northern Line Extension. Keeping the station closed after the 2020 launch date is an ‘option’. Committing to a programme of heavy transport infrastructure is imbued with risk. The proposals for meeting a funding gap are thus highly insecure and potentially onerous for current and future Londoners both in terms of a future tax burden, and possible unfulfilled necessities for investment other than transport.

As a consequence, the Implementation Plan beyond the current Business Plan period, is largely a wish list.

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?

Relatively little is written on Local Implementation Plans (LIPs) although “within this strategy, several policy goals can only be achieved with substantial borough-level intervention” [p275]. These are quite fundamental ones: “Healthy Streets and healthy people, including traffic reduction strategies; good public transport experience; and new home and jobs”. This is all dependent on the willing collaboration of the boroughs and this is in the light of the tenuous funding of the MTS, as explained above. The handing down of policies and proposals give limited space for the originating at a local level of proposals that are appropriate for the locality and its particular character and ambitions. To be effective in delivery, the MTS should clearly set out the resourcing and expectations to be placed up on boroughs having first ascertained that they are broadly acceptable and, therefore, realistic.

LIPs lack weight and cross boundary projects, and so it seems, uncertain future funding. A more local and sub-regional approach to the planning of transport is required. This should be in the public arena by harnessing existing sub-regional partnerships and any TfL's sub-regional strategies which presently avoid public scrutiny prior to publication.

It is noted that TfL's Travel in London annual statistical report will publish trends and outcomes [p282]. Nevertheless it is standard practice for the tests of appraisal and evaluation and the indicators to be identified within the 'covers' of a strategy. But as the IIA Report explains in para 8.5.3 [p85]: “the draft MTS does not include a comprehensive set of monitoring indicators to measure and evaluate progress towards the goals or improvements against the challenges identified in the MTS”. Again, para 8.5.4 [p85]: the multi-criteria framework tool to appraise schemes and proposals has yet to be developed. Clearly further work here is required before adoption is proposed. At least a table should be incorporated into the strategy showing the targets and objectives, the indicators, how and where they are presented so that users can find the reports on any adverse effects during implementation.

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

Process/next steps issue:

It is understood that the London Assembly review period for the draft MTS will be in January 2018 with a launch of the finalised strategy early 2018, possibly close to the close of consultation on the new London Plan. Such early finalisation of the MTS would be premature and injurious to the iterative process whereby the Mayor's principal strategies inform and refine one another as they are exposed to administrative and public scrutiny. This made all the more important because the draft MTS has significant policies and proposals that predetermine the spatial framework for London's future. Such a framework should be determined through the new London Plan making process as this, as the Spatial Development Strategy, is the overarching spatial strategy for London. The Mayor's The London Planning

Statement, Supplementary Planning Guidance May 2014, explains this in para 2.4: *“The London Plan also provides an overarching framework for the Mayor’s other strategies, by: providing a spatial (geographical and locational) framework and context for his other strategies (such as those on transport, economic development, housing and the environment); bringing his strategies and policies together in a single, comprehensive framework, showing how together they will contribute to the sustainable development of London over the next twenty years; and giving effect to those of the Mayor’s policies that require the planning system for implementation.”*

The Supreme Court in 2014 (*R (on the application of Moseley (in substitution of Stirling Deceased)) (Appellant) v London Borough of Haringey (Respondent) [2014] UKSC 56*) confirmed the ‘Sedley’ or ‘Gunning’ principles that consultation must, in order to be considered fair: *“take place when the proposal is still at a formative stage; that sufficient reasons for the proposal be put forward to allow for intelligent consideration and response; that adequate time be given for that consideration and response; and that responses be conscientiously taken into account”*, and went a step further, extending the interpretation of fairness to include consultation on alternatives. It is understood that the new London Plan with its supporting Integrated Impact Assessment will present various spatial options, as is required by the Strategic Environmental Regulations, for public consultation. But the draft MTS, in presenting a certain determined view of the trajectory for London’s future, effectively undermines the London Plan consultation process, negating the authenticity of its exploration of alternatives and the possibility of revisions. Premature finalising of the MTS would pre-empt the proper plan-making process and increase the risk of both strategies to judicial review.

IIA Report for the draft MTS

Section 3.9 IIA Process: para 3.9.4 “Stages B and C in Figure 3.2 (presented in this IIA report) of developing and refining alternatives and assessing impacts will be subject to public consultation and will take into account the responses of those consulted”.

The IIA is now at Stage D and no known public consultation has happened at Stages B and C. Close reading of still relevant ODPM Guidance and the EU Directive has generated the Just Space analysis that sets out the required and recommended involvement of the public at the early formative stages. This is below. The ODPM guidance on p10 applying Article 6.1 & 6.2 explains that the public shall be given an early and effective opportunity ... to express their opinion on the drafts... at both Stages B and D. The public were not given this opportunity. A caution on engagement was given in the Just Space comments on the Scoping Report, but was not heeded. Indeed by letter dated 1st December 2016, Lucy Hayward-Speight, TfL, wrote: “ The public will be have the opportunity to comment on the draft MTS and IIA at a stage which can still be described as formative and will be able to influence the final documents. Parliament saw fit to design a consultation process for the MTS and the IIA and the GLA and TfL intend to fully comply with the requirements imposed”. They have not according to government guidance and EU Directive transposed into UK law.

Note that In the IIA Scoping Report of October 2016, the equivalent paragraph to para 3.9.4 would have been 3.10.4 on p13 or p14. This was missed off the version circulated to Just Space in October 2016.

Involvement of the public at Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope

Just Space comment: Stage A identifies other relevant policies, plans, environmental protection objectives and the current state of the environment – baseline information and environmental problems; develops SEA objectives; and consults on the scope of the assessment.

Fig 1 – The SEA Directive’s Requirements on Consultation
(scoping stage)

At Stage A

- authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4). [p10 ODPM Practical Guide]

But see also para 5.A.2

Responsible Authorities need to consider what information they already have and what more they will need. They may already hold useful information, for example from environmental assessments of previous plans or programmes. It may be useful to consult the public at this stage to seek additional information and initial opinions. [[p26 ODPM Practical Guide]

And Appendix 3

- Other consultees, including representative bodies and members of the public, who often have a wealth of knowledge and understanding of the strategy or plan area, e.g. local conservation groups.

Involvement of the public at Stage B: developing and refining alternatives and assessing effects

Just Space comment: Stage B tests the plan’s objectives against the SEA objectives; develops strategic options including reasonable alternatives, predicts/evaluates the effects of the plan and alternatives, considers mitigating and maximising beneficial effects; and proposes monitoring measures.

Fig 1 – The SEA Directive’s Requirements on Consultation
At Stages B, D

- authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). [p10 ODPM Practical Guide]

Appendix 6 developing and assessing alternatives

“Stakeholders may usefully be involved in the generation and assessment of both strategic and more detailed alternatives through consultation. Demonstrating that there are choices to be made is an effective way of engaging stakeholders in the process. The alternatives considered throughout the process must be documented and reasons given on why they are or are not taken forward.” [p69 ODPM Practical Guide]

Appendix 1 : Proposal for a Community Generated Spatial Option

1. The growth challenges facing London require a new geography and a fresh imagination, underpinned by inclusive growth, fairness and diversity of people, businesses and places, therefore avoiding over-reliance on the Central Activities Zone/Isle of Dogs, high-order Town Centres and on a small number of economic sectors.

2. This new geography for London will be a network of Lifetime Neighbourhoods and Lifetime Suburbs, providing many key amenities and job opportunities locally, thus reducing the need for costly and polluting travel into the Central Activities Zone. Outer London in particular needs lifetime suburbs and a real mixed development strategy. Through a new approach to public and community-owned assets driven by social sustainability objectives, social infrastructure and community spaces in all parts of London will be protected, avoiding the previous decimation of community assets in working class and multi-cultural geographic areas. It will be a Blue Green City, placing value on the connection and interaction between London's blue and green assets.

3. The South East region and the other regions of the UK are a spatial context which has to be considered in thinking about the spatial future of London. Inclusive growth, that puts economic fairness, health and well-being and environmental sustainability at the heart of development would require a re-balancing with the rest of the UK economy and involve the Mayor in partnerships and collaborations with other cities and regions. Such negotiations could lead to welcome reductions in London's need to find space for additional homes or jobs.

4. It seeks growth by fostering higher pay, investment and productivity in the 50% of London jobs where real wages have been static or falling. It avoids the extinction of viable enterprises in industrial zones, in high streets and local centres and supports the provision of new workspace suitable for diverse activities and sectors, particularly in the foundational economy. This approach offsets the historic sectoral bias in favour of financial and business services in the centre.

5. To achieve a balanced polycentric development the public transport priorities will be orbital movement plus walking and cycling, with investment directed towards smaller scale infrastructure rather than commuter routes such as Crossrail 2. This connects well with the aim of protecting more workplaces outside the centre and with the Lifetime Neighbourhood and Lifetime Suburbs objectives, increasing accessibility and connectivity locally.

6. All parts of London (central, inner and outer London and the more affluent geographic areas within Boroughs) will contribute in an equitable way to meeting London's housing needs. There will be a high percentage of not-for-profit rented homes everywhere, the cessation of estate renewal on current terms (which entails demolition/eviction and big net losses of existing social rented housing in geographical areas where there is a high concentration of working class and minority ethnic communities) and direct development by GLA and Councils of not-for-profit rented housing on public land as a matter of urgency;

7. A continuous process of engagement will give voice and agency to all Londoners with a geographically dispersed model of hubs instead of all connections and resources being targeted at a central hub. Targeting areas of need will close deprivation gaps by measures that raise the Quality of Life of existing communities

rather than through their dispersal/displacement. Programmes will be provided so that areas with a high concentration of working class and minority ethnic communities can access the participation tools that are available, such as community rights under the Localism Act.

Appendix 2: Transport Objectives

Reduce Need to Travel by lifetime suburbs, providing key amenities and job opportunities locally **and Plan and Make the Transport System Work Better** with smaller scale changes balanced throughout London and greater public participation in transport planning

Promote Active, Affordable, Integrated and Accessible Travel that is the alternative by choice to car dependency: More investment throughout London in walking, cycling and accessible transport, and in Outer London in public transport services, particularly bus services and Orbital Rail.

Improve environment and infrastructure: Strong road traffic reduction targets, fewer vehicles and cleaner vehicles; implementing London wide road user charging, strengthening Low Emission requirements to include cars and avoiding traffic generating transport schemes.

Promote an integrated approach to freight; With a network of consolidation hubs and managed distribution for the final leg of delivery. Shift road freight to rivers and canals by implementing the Blue Ribbon Network and enhance water transport opportunities, facilities and services.