



# Draft Mayor's Transport Strategy

TfL's Report to the Mayor  
on the statutory consultation  
March 2018

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# Executive Summary

We, Transport for London (TfL), on behalf of the Mayor of London, Sadiq Khan, undertook a public and stakeholder consultation on the draft Mayor's Transport Strategy. The consultation ran for over 14 weeks; from 21 June to 02 October 2017. During the consultation we carried out an extensive marketing and engagement programme to promote the consultation and seek the views of Londoners, businesses and stakeholders.

We received 6,110 public responses and 476 responses from stakeholders and businesses which generated 43,550 discrete comments. We received a further 383 campaign based responses as part of five stakeholder led campaigns. We also ran a series of deliberative workshops to ensure we received the views of a diverse sample of Londoners.

## **Summary of responses**

There was broad support for the Vision, the Healthy Streets Approach and the 80 per cent mode share target, although there were concerns about whether the level of behaviour change required would be achieved, especially in outer London.

The strategy was welcomed by the majority of stakeholders, including boroughs, the transport industry, and notably the health sector. As you would expect with a high level strategy covering a large number of issues, for specific parts of the strategy, there was sometimes less consensus, and on many issues we received comments expressing divergent and often opposing views.

There was support for the strategic policy direction established in the document and a desire to see it delivered, although there was some opposition to the strategy's aim to increase active travel. There were concerns the strategy lacked sufficient detail in a number of areas. There were also calls from both the public and stakeholders for more ambitious timescales (and for the inclusion of interim milestones) especially for the proposals concerning the environment, safety and accessibility.

Regarding 'Healthy Streets and healthy people' chapter, there was support for improving air quality; the walking and cycling proposals; and Vision Zero to tackle road danger (although there were calls for this to be extended to all modes).

There was a mixed response to road user charging with some seeing this as key to being able to deliver the strategy, while others expressed concerns about a revision of the current, or development of any future, charging schemes.

Regarding the 'A good public transport experience' chapter, there was a good level of support for delivering Crossrail 2; rail devolution and providing a metro-style service on suburban rail; and improvements to station capacity. In response to the

'New homes and jobs' chapter, there was good support for the adoption of the transport principles of 'good growth'.

### **Summary of key issues**

A number of areas of concern and suggestions for improvement were made across the strategy. Notable issues included:

Regarding the **Healthy Streets and healthy people** chapter, a key request was for it to better address the challenges of mode shift in outer London. There were also concerns that how we manage conflict between different road users and how we allocate road space is not clear enough.

There were calls for a clearer freight strategy (including river and rail) and concerns raised about the impact of multiple schemes on the industry and on small and medium sized businesses.

The requirement to co-ordinate borough traffic reduction strategies was also noted. As were concerns about how we ensure infrastructure is in place to allow growth in low emission vehicles.

Regarding the **A good public transport experience** chapter, there were concerns as to whether the affordability of transport was fully addressed and also the human element required for good customer service. There were also calls for the strategy to better address public transport accessibility and also to apply a broader definition of accessibility.

There were also requests for a broader range of rail capacity improvements, more ambition on tram extensions and clearer proposals on buses, orbital public transport and better utilisation of the river.

Regarding the **New homes and jobs** chapter, there were mixed views on the future of river crossings, along with calls for a range of options to be assessed for southern access to Heathrow.

Regarding the **Delivering the vision** chapter, there were concerns that the opportunities for new technology were not fully recognised.

There were also concerns about deliverability and consistency in provision across multiple partner agencies; how the strategy is funded; and mixed views on future funding opportunities – especially in regard to devolution of Vehicle Excise Duty.

### **Summary of changes**

We have recommended a number of changes to the strategy in response to issues raised during the consultation. Below is a summary of the changes – this is not an exhaustive list, for full details please refer to chapter 6.

In the **Vision** and relevant chapters we have recommended that the narrative on the opportunities from new technology is strengthened to ensure that innovations contribute to Mayor's Transport Strategy outcomes and the public good. We also recommend a clarification that Vision Zero applies to the whole transport system.

In the **Healthy Streets and healthy people** chapter, we advise the narrative and proposals regarding freight are strengthened and also that proposals to clarify that improvements to air quality and mitigation against climate change will be taken forward as soon as practicable.

In the **Good public transport experience** chapter, we have recommended a strengthening of the narrative on accessibility and inclusion (this also applies across the strategy). We have also recommended the narrative on bus services and bus priority (including a revised map showing the plans for buses in outer London), and also the narrative on national rail in London, including station capacity, interchanges, train service capacity, and rail freight, are all strengthened.

In the **New homes and jobs** chapter we have recommended the inclusion of a new section on setting out the potential route and benefits of a west London orbital rail line and requested additional narrative and a proposal to extend the tram network to Sutton, funded primarily from locally derived sources. We also recommended a revision of the narrative around southern rail access to Heathrow, including a basis to consider more options with Network Rail.

In the **Delivering the vision** chapter we have recommended the inclusion of a new section on mode shift in outer London, referring to proposals from across the strategy which will contribute.

### **Next steps**

Having completed the public and stakeholder consultation, and in response made a number of changes to the draft Mayor's Transport Strategy, the Mayor is asked to approve the final text for the purpose of its formal adoption. If he does so, the 2010 strategy will be replaced by the revised Mayor's Transport Strategy.

# Chapter 1 - The Draft Mayor's Transport Strategy

## 1.1 Introduction

The Mayor's Transport Strategy (MTS) is the principal policy tool through which the Mayor exercises his responsibilities for the planning, development, provision, and management of transport in London.

The Mayor is required to prepare and publish a transport strategy and to keep that strategy under review. As specified in the Greater London Authority Act 1999 (GLA Act), the MTS must contain his policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London, his proposals for discharging his duty of exercising his powers for the purpose of securing the provision of those transport facilities and services, his proposals for providing accessible transport as well as a timetable for the implementation of such proposals and any other appropriate proposals. In revising any of his statutory strategies, the Mayor must have regard to the effect the revised strategy would have on the health of persons in Greater London and the achievement of sustainable development in the UK and include those policies and proposals which are best calculated to promote improvements in health and contribute to the achievement of sustainable development.

There have been significant developments in transport facilities and services since the publication of the current MTS in 2010, as well as changes to London's population and employment forecasts. Given this context the Mayor of London, Sadiq Khan, decided that it is appropriate for the MTS to be revised to reflect the current climate and the strategic direction, as set out in his 'A City for All Londoners' document (published for consultation in October 2016).

The development of this revised strategy was delegated to Transport for London (TfL), although the Mayor retained responsibility for approving the draft and associated consultation materials. TfL was also delegated the responsibility for undertaking the necessary consultation exercises and impact assessments.

This is a report of the outputs of the public and stakeholder consultation on the draft MTS and Integrated Impact Assessment. It includes recommendations to the Mayor for changes to be made to the draft strategy to address issues raised in the consultation.

# Chapter 2 - The consultation

## 2.1 Purpose

The objectives of the consultation were:

- To fulfil the Mayor's statutory requirements under the GLA Act
- To seek informed, meaningful and constructive responses to help to shape the final strategy, by ensuring sufficient information was provided to stakeholders and the public:
  - To gauge the level of support for the vision and aims of the strategy
  - To understand any concerns and objections
  - To identify any potential areas and issues that were missing

## 2.2 Potential outcomes of the consultation

The potential outcomes of the consultation were:

- Following careful consideration of the consultation responses, the Mayor decides to proceed with the policies and proposals as set out in the draft MTS and publish the strategy
- Following careful consideration of the consultation response, the Mayor amends the policies and proposals and publishes an updated strategy

## 2.3 Pre-consultation engagement

The transport strategy, as all other Mayoral strategies, has been revised to reflect the priorities and direction set out by the Mayor in 'A City for All Londoners', which the Mayor published for consultation in October 2016.

During that consultation, the GLA led a series of engagement activities with a wide range of stakeholders, the outcomes of which were considered in the revision of the draft MTS. Following this, an extensive programme of pre-consultation engagement was undertaken by TfL with over 250 stakeholder organisations, to develop and refine the MTS policies. This engagement included one to one meetings, briefings, workshops and panel discussions and included:

- Using established engagement events to discuss the emerging MTS including London Councils Transport & Environment Committee meetings, TfL's Freight Forum, the Bus Forum, the Business Improvement District Roundtable, the

Pan-London Mobility Forum, the Independent Disability Advisory Group (IDAG) and the TfL Youth Panel

- Specific MTS meetings with stakeholders including London TravelWatch, London boroughs, transport and environment campaign groups, business organisations, the Wider South East, and groups representing specific communities including disabled and older people
- Presenting to and leading discussions at third party arranged events including those organised by London First, Institution of Civil Engineers, Urban Design London and Future of London
- Developing a 'London 2040' tent at the Transported by Design festival, where artists captured the ideas for transport in the future to inspire the public to consider the challenges for London's transport over the next 25 years

A full list of these engagement activities is available in Appendix A.

## **2.4 Who we consulted**

The GLA Act, as amended, requires the Mayor to consult the following on his proposed policies and proposals:

- the London Assembly;
- functional bodies;
- each London borough council;
- the Common Council of the City of London;
- any other body or person who he considers it appropriate to consult but he must include:
  - voluntary bodies some or all of whose activities benefit the whole or part of Greater London;
  - bodies which represent the interests of different racial, ethnic or national groups in Greater London;
  - bodies which represent the interests of different religious groups in Greater London;
  - bodies which represent the interests of persons carrying on business in Greater London
- the Disabled Persons Transport Advisory Committee;
- such other persons or bodies which represent the interests of people with mobility problems as he considers it appropriate to consult



For the Strategic Environmental Assessment carried out in respect of the MTS, as part of the wider Integrated Impact Assessment, the Mayor must also consult:

- Natural England;
- English Heritage
- The Environment Agency

Encouraging participation in a consultation on strategy documents is always challenging. Often the length of the document can be off-putting. Similarly, there is a challenge in making a strategy that looks forward over the next 25 years relevant and meaningful to the individual. Therefore the statutory requirements placed on this consultation rightly place a focus on the principal audiences of statutory bodies and stakeholder groups, as they are best placed to provide balanced views on behalf of the groups they represent.

However, it was important that we provided an opportunity for anyone with an interest to participate in the consultation. The consultation was therefore widely promoted to the public and a series of deliberative workshops were held to ensure feedback from a representative sample of Londoners was received. Further details on this are in section 2.9.

## **2.5 Dates and duration**

The consultation ran for 14.5 weeks; from 21 June to 2 October 2017. This timeframe was considered necessary to allow for the summer holiday period.

## **2.6 What we asked**

The consultation consisted of two separate questionnaires. One was aimed at the public and asked a mixture of closed and open questions about the challenges, overall vision and aims, the challenges, and the 'Healthy Streets and healthy people', 'A good public transport experience' and 'New homes and jobs' chapters. The other was aimed at businesses and stakeholders / stakeholder organisations and asked a mixture of closed and open questions for each element of the whole strategy. These questions were also included in the draft document at the end of each relevant chapter.

This decision to split the surveys was based on the assumption that members of the public were more likely to engage with the executive summary than the full strategy, which is over 300 pages long. A copy of both consultation questionnaires is enclosed at Appendix B.

## 2.7 Methods of responding

Respondents were able to submit their responses through the following channels:

- By completing an online questionnaire available via [www.tfl.gov.uk/mayors-transport-strategy](http://www.tfl.gov.uk/mayors-transport-strategy)
- By email to [consultations@tfl.gov.uk](mailto:consultations@tfl.gov.uk)
- In writing to Freepost TfL Consultations
- By phone via 0343 222 1155
- By completing a hard-copy of the consultation questionnaires which were made available on request

## 2.8 Consultation materials and publicity

A marketing and stakeholder engagement campaign was used to raise awareness of the consultation and to encourage people to have their say.

### Website

Our on-line consultation portal ([www.tfl.gov.uk/mayors-transport-strategy](http://www.tfl.gov.uk/mayors-transport-strategy)) hosted the draft strategy and the Executive Summary (also available as an EasyRead version) as well as a short video summarising the key elements of the strategy. It also hosted the following supporting documents:

- The Evidence Base - these reports formed the analytical basis of the strategy development process. They contain analysis of past trends, current conditions and modelling of possible futures, and make the case for the Aims, policies and proposals set out in the strategy.
- The Integrated Impact Assessment – this is an iterative assessment of the environmental, social and economic impacts of the strategy's policies and proposals.

A dedicated web page was also available on both TfL's (<https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/the-mayors-transport-strategy>) and the GLA's (<https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017>) main pages which signposted people to the on-line consultation portal.

### Copies of draft MTS and Executive Summary

Hard copies of both the full draft strategy and the executive summary were made available on request. Reference copies were also placed in 20 locations across London. A full list of locations is at Appendix C.

## **Emails to public**

An email campaign publicised the consultation and how and when to respond. The email was sent to 1,658,211 registered TfL customers and drivers, with an open rate of 28 per cent and a click-through rate to the consultation webpage of 2.1 per cent (approx. 35,000 people). These compare well with rates for similar exercises.

A copy of our email is attached in Appendix D.

## **Emails to stakeholders**

At the launch of the consultation, we sent emails to 2,060 stakeholders representing 978 organisations (12 letters were also sent to those without email addresses) to inform them of the launch of the consultation and explain how and by when they should respond.

The list of stakeholder organisations contacted, as well as copies of the emails sent, is included in Appendix E.

## **2.9 Press and media activity**

Two press adverts were run in the Evening Standard to publicise the consultation. A press release was issued on 21 June to a selection of international, national and London based media, as well as black, Asian, minority ethnic (BAME) media and trade media.

A press release focusing on the Healthy Streets element was also issued to select media on 20 June.

The consultation received media coverage from a number of outlets including print coverage in the Evening Standard, The Sun, Daily Mail, Times, Guardian and Independent, and broadcast coverage on the BBC and ITV News, as well as a number of trade and local titles.

The press releases are included at Appendix F, together with examples of media activity.

## **2.10 On-site advertising**

4,509 posters advertising the consultation were placed across our poster sites on the Bus, London Overground, London Underground and DLR networks.

## **2.11 Social Media**

We ran a social media campaign advertising the consultation between 21 June and 27 September. A total of 36 posts were scheduled, 35 of them on Twitter and 1 on Facebook.

A bitly link was used to track how many people clicked-through to the MTS consultation portal (all posts included the link: <http://bit.ly/tflmts2017>), counting 11,751 click-throughs.

A number of London boroughs agreed to complement TfL's social media campaign with publicity of their own, primarily through Twitter.

## **2.12 Digital advertising**

We ran a digital advertising campaign using paid-for search and digital display advertising. The digital display advertising was live from 10 August to the 29 September and generated 7,495 'lands' on the consultation page.

The paid-for search (using key words such as 'mayor transport strategy', 'London transport plan', 'London transport plan' and 'London transport strategy') generated 2,142 click-throughs to the consultation page.

## **2.13 Deliberative Workshops**

We ran four deliberative workshops with an invited sample of 77 Londoners across four locations (16-18 participants per workshop). The sessions took place across inner and outer London to ensure a mixed sample and to capture the voice of Londoners living in different local contexts.

The sessions represented the diversity of London's population ensuring the following groups were represented:

- Gender
- Age and life stage
- Social economic grade
- Ethnicity
- Disability (physical, mental and sensory)
- Protected groups – gay / lesbian / bisexual / transgender

A summary of the key findings from these sessions can be found in section 5 of this report. A full report documenting the output of these sessions can be found in Appendix G.

## **2.14 Stakeholder Workshops, Meetings and Events**

We undertook an extensive programme of stakeholder engagement during the consultation period to ensure stakeholders were well briefed and able to participate in the consultation.

A stakeholder breakfast briefing was held on the morning of 21 June to launch the consultation with 275 stakeholders invited and 56 attending.

6 workshops were held, catering for the following stakeholder groups:

- London boroughs
- Freight and business
- Communities, including accessibility groups
- Environment, health and road users
- Growth and development
- Suppliers and industry

450 representatives from stakeholder organisations were invited to these workshops with 172 attending.

A list of invited organisations and event attendees along with a summary note of issues raised can be found in Appendix H. The issues raised are also addressed in chapter 6 of this report.

We also met with a wide range of stakeholders in response to briefing requests, meetings and third-party events. There were 56 such occasions and a full list of these can be found in Appendix I.

## **2.15 Implications of the Equalities Impact Assessment for the consultation**

An Integrated Impact Assessment (IIA) was undertaken in regard of the draft strategy. This incorporates an Equality Impact Assessment which found the draft MTS to have a net minor to moderate positive impact against the social and health focussed IIA objectives. No significant issues were therefore raised for protected groups; nonetheless, we took steps to ensure the draft strategy was made accessible to protected groups, as described below

## **2.16 Measures taken to encourage participation**

Recognising that engaging with a large strategy document is challenging for some people, we have made every effort to make the strategy as accessible as possible. The following steps were therefore taken:

- A shorter Executive Summary was provided that was easier to engage with
- An Easy Read version of the Executive Summary was provided
- A short video was produced, with subtitles, describing key elements of the strategy
- The provision of consultation documents in other formats was offered on request
- The launch of the consultation was publicised in a variety of ways
- The submission of consultation responses was available by a variety of methods

Stakeholder groups representing people with disabilities and other seldom heard / protected groups were actively engaged. Protected groups were also adequately represented at the deliberative events.

## **2.17 Analysis of consultation responses**

Following a competitive process, Steer Davies Gleave (SDG) were commissioned to undertake statistical and thematic analysis of the responses to the consultation.

The statistical analysis was of the closed questions within the public and stakeholder / business questionnaires. The result of this can be found in Chapter 3 and 4 of this report.

The thematic analysis refers to the categorisations of statements within consultation responses into distinct issues (or 'codes') and the further categorisation of these codes into themes. A series of comprehensive code frames were developed to help categorise and report the points made by both the public and stakeholders in their responses.

Comments received to free text questions in both the public and stakeholder / business questionnaires were often for parts of the strategy not relevant to that particular question. SDG were therefore instructed to attribute comments to the most appropriate part of the strategy. This meant SDG developed code frames for each of the 6 main chapters of the MTS (5 for the public as specific questions were not asked on 'Delivering the Vision' - where comments were provided these were recorded in the 'Others' frame) and also a frame on comments relating to the IIA and comments that fell outside of the main structure of the MTS. These code frames are available in Appendix J.

All stakeholder and public open responses were read and analysed by SDG analysts. Individual comments were coded to one or many of the codes within the code frames as appropriate. In order to help categorise the nature of comments we also asked SDG to classify whether comments were supportive of the proposals / in

opposition to the proposals / raised concerns about the proposals / made suggestions to improve the proposals.

To ensure consistency between individuals coding responses, the coding of 50 stakeholder responses were checked across team members. Samples of coding were also shared with TfL to check for quality and accuracy.

## **2.18 Our approach to classifying and reporting on the analysis**

We received a large number of responses with 6,110 replies from the public and 476 from stakeholders and businesses. In total this generated over 43,550 coded comments. We wanted to ensure a consistent and accountable methodology in the way we reported on the issues raised and to balance this with the need to create a readable and useful consultation report.

However, In order to manage this volume of comments it was necessary to apply a classification process to determine what to report on. This consisted of the following:

- Reporting on issues raised by more than 20 public responders or 5 stakeholders / businesses responders, so long as they were strategic in nature and not technical or geographically specific
- To support this, and to ensure no pertinent issues were missed, we :
  - included all issues raised in the deliberative events and;
  - included the output of the TfL City Planning team's own review of all stakeholder and large business responses.

We have reported on each individual chapter of the draft MTS and presented the key issues raised in the order that these were addressed in the draft strategy. A final section considers issues raised that are pertinent to the development of the MTS but fall outside of the current structure of MTS. It also covers issues raised with regard to the IIA.

Each section considers the different types of comments made and sets out TfL's response and recommendations for amendments to the strategy for the Mayor's consideration.

It is important to note that the MTS is a long-term strategy for London, covering the period up to 2041. There are numerous other Mayoral and TfL strategies, business plans, service plans and local agreements which contribute to the planning, management and development of London's transport infrastructure and services. Many of the issues raised in this consultation are more appropriate for these documents or for the development of the proposals into specific projects, many of which will be subject to their own individual consultation processes as they are taken forward.

## **2.19 Late Submissions**

We received 39 un-notified responses outside of the consultation period. While these haven't been included in SDG's code frames, as they were received after the period agreed with SDG for analysis, they have been reviewed by TfL and all substantive points feature in our analysis. Of the 39 responses, 14 were part of a Mums for Lungs campaign and nine were from an Alliance of British Drivers campaign. A further six were from stakeholder organisations (Luton Borough Council, Hertfordshire Infrastructure and Planning Partnership, Hermes UK, Deptford Neighbourhood Action, London Fire Brigade, and the United Kingdom Warehousing Association). The remaining 10 were from members of the public.



# Chapter 3 - The respondents

## 3.1 Number of respondents

We received 6,964 responses to the consultation. The table below shows what proportion of responses were from the public, stakeholders, businesses and what proportion were generated from campaigns.

Respondents	Total	%
Public Responses	6,110	88%
Stakeholder Responses	361	5%
Business Responses	115	2%
Campaign Responses	383	5%
Total	6969	100%

## 3.2 About the public respondents

This section provides more information about the 6,110 members of the public who responded to the consultation, including information on how they identified themselves, methods they chose to submit their views, and how they heard about the consultation.

Please note that percentages have been rounded. For them to add up exactly to 100 per cent we would need to display up to two decimal points.

### 3.2.1 How respondents heard about the consultation

We asked respondents how they had heard about the consultation.

How respondents heard	Total	%
Received an Email from TfL	3,216	53%
Read about in the press	338	6%
Social media	1,003	16%
Saw it on TfL website	245	4%
Other	513	8%
Not answered	717	12%
Total	6,110	100%

### **3.2.2 Methods of responding**

We asked respondents which channels they had used to submit their comments to the consultation.

<b>Response method</b>	<b>Count</b>	<b>%</b>
Online	5,745	94%
Letter/email/paper/survey/phone	365	6%
Total	6,110	100%

### **3.2.3 Gender of respondents**

We asked respondents how they would identify themselves.

<b>Gender</b>	<b>Total</b>	<b>%</b>
Female	1,727	28%
Male	3,307	54%
Gender neutral	29	<1%
Trans female	12	<1%
Trans male	7	<1%
Prefer not to say	291	5%
Not answered	737	12%
Total	6,110	100%

### **3.2.4 Ethnicity of respondents**

We asked respondents to identify their ethnic background.

<b>Ethnicity</b>	<b>Total</b>	<b>%</b>
White – British	3,122	51%
White – Other	844	14%
Asian or Asian British – Indian	179	3%
White – Irish	121	2%
Asian or Asian British – Chinese	70	1%
Black or Black British – African	65	1%
Mixed – Other	61	1%
Black or Black British – Caribbean	55	1%
Asian or Asian British - Other	54	1%
Asian or Asian British - Pakistani	47	1%
Mixed – White and Asian	41	1%
Other Ethnic Group	37	1%
Asian or Asian British – Bangladeshi	28	<1%
Mixed – White and Caribbean	21	<1%
Mixed – White and Black African	16	<1%
Black or Black British - Other	15	<1%
Other Ethnic Group – Arab	15	<1%
Other Ethnic Group – Latin American	15	<1%
Other Ethnic Group – Turkish	6	<1%
Other Ethnic Group – Gypsy/Irish Traveller	5	<1%
Other Ethnic Group – Kurdish	3	<1%
Prefer not to say	524	9%
Not answered	766	13%
<b>Total</b>	<b>6,110</b>	<b>100%</b>

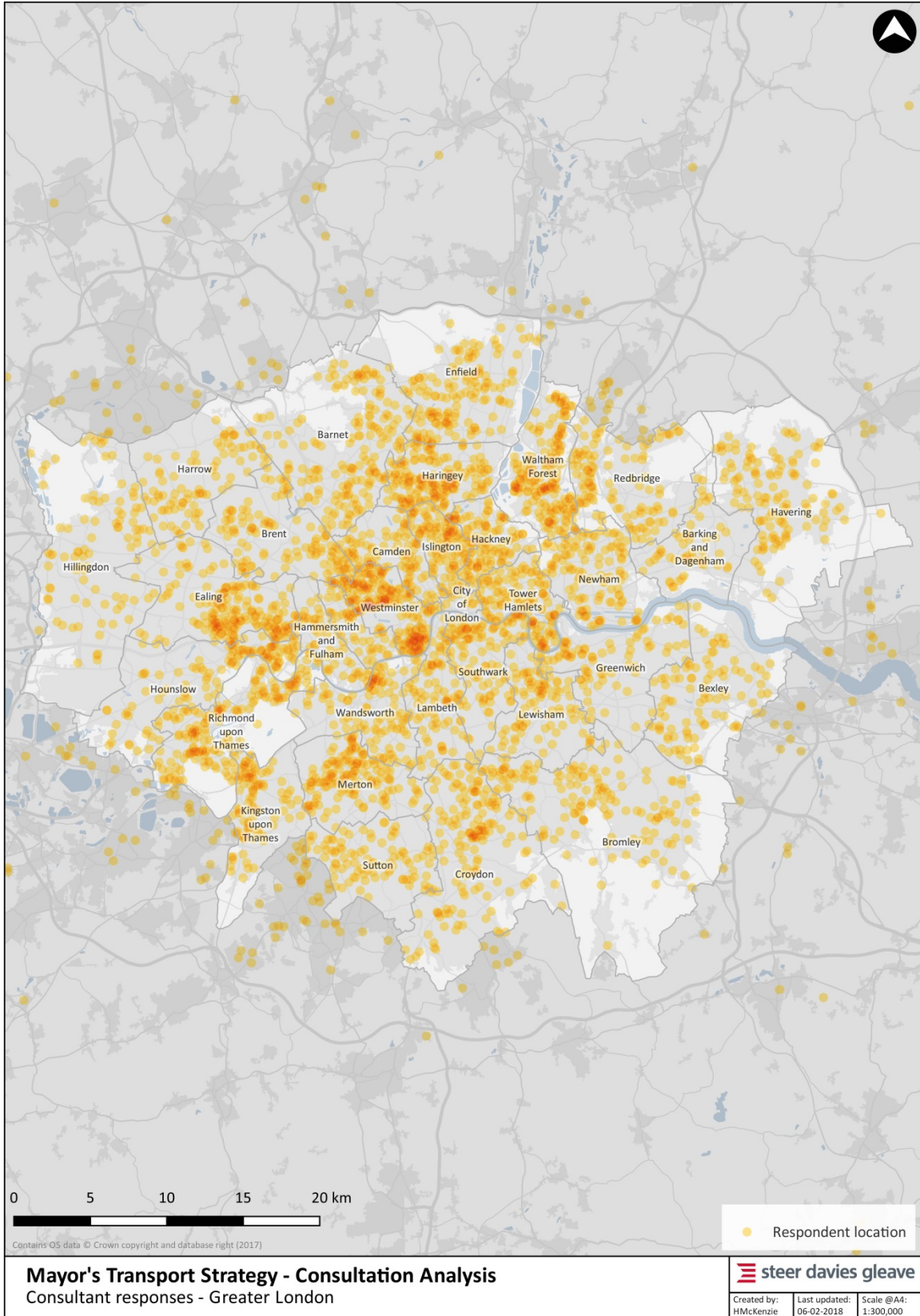
### **3.2.5 Age of respondents**

We asked respondents to select their age bracket.

<b>Age</b>	<b>Total</b>	<b>%</b>
Under 15	17	<1%
16-20	60	1%
21-25	176	3%
26-30	376	6%
31-35	502	8%
36-40	531	9%
41-45	522	9%
46-50	587	10%
51-55	606	10%
56-60	602	10%
61-65	506	8%
66-70	307	5%
71+	247	4%
Prefer not to say	359	6%
Not answered	712	12%
<b>Total</b>	<b>6,110</b>	<b>100%</b>

### **3.2.6 Distribution of respondents**

We asked respondents to provide us with a postcode. 4,184 provided a postcode and we were able to geocode 4,044 of these. Of those that provided a postcode, 91 per cent were within London and 9 per cent were outside. The map over the page plots the location of every respondent who provided us with a valid postcode within the London area.



### 3.3 About the Stakeholder and Business responses

We received 361 responses from individual stakeholders / stakeholder organisations and a 115 from those that either identified themselves as businesses, or have been categorised as a business response.

We received more than one response from 12 stakeholder organisations and two businesses. For the purposes of recording numbers we have only counted one response per organisation but we have combined the detail of their responses for analysis purposes.

We have categorised stakeholder responses into types and these stakeholder types along with the number of responses in that category are in the table below. A full list of all stakeholders and businesses that responded can be found in Appendix K.

We have provided summaries of responses from national / local government bodies, regional politicians and campaign / think tanks / health / environment / charities / business groups with a regional focus and large multi-site businesses. These can be found in Appendix L.

Stakeholder Type	Number of responses	%
Local/National Government Bodies	72	20%
Political	17	5%
Think Tank/Academics	7	2%
Health	15	4%
Environment	11	3%
Charities	14	4%
Campaign Groups	49	13%
Trade Association/Business Groups	56	16%
Local Groups	69	19%
Land Owners and Utilities	16	4%
Transport	22	6%
Other	13	4%
Total	361	100%

## 3.4 Campaign Responses

### 3.4.1 Introduction

During the consultation we received 383 emails from members of the public as part of five stakeholder led campaigns. These campaigns were led by Alliance of British Drivers, ZipCar, Mums for Lungs, Stop Killing Cyclists and Transport for All.

In the case of all the campaigns, it appeared that respondents had been provided by the organiser of the campaign with a template response which could be amended.

Further detail about each of the campaigns and an analysis of any additional comments that were received is set out below.

### 3.4.2 Alliance of British Drivers (ABD)

We received 247 responses as part of this campaign; 244 as emails and three leaflets. ABD had provided 11 templates of text. An example of one is below and the full set can be found in Appendix M.

I wish to object to the draft Mayor's Transport Strategy proposals.

I particularly object to any extension of the Congestion Charge. When he was after our votes last year, Sadiq Khan promised he would just maintain the Congestion Charge at its current level.

He is not to be trusted with any new ways of paying for road use, such as powers to set the rate of road tax (VED). It is obvious that he would be after more money not less. The proposals would hurt many ordinary families.

I also object to the proposal to make councils force us out of our cars through traffic reduction measures. Public transport is already overcrowded, yet the plan seems to be to want an unnecessarily large population increase. This will just increase the pressure on public transport and road space.

An alternative to local road pricing schemes was given as Workplace Parking Levies, which would be a tax on going to work. Whoever thinks up these ideas is simply on another planet.

These sweeping proposals could be very expensive, and of course Londoners would have to pay for them. Not even basic cost figures are given. They don't meet the legal requirement that people being consulted should be given enough information to make an informed decision.

Would it be too much to ask the Mayor to go back to the drawing board and ask London's many motorists what they actually want?

Of the emailed response, 116 were almost identical to at least one of the templates, or made very minor changes, such as the provision of details of where they live. 100 responses were based on the text on one of the templates. Different wording was at times used but the same points were made and/or limited extra substantive points



were made. Many personalised with context such as details on their personal car use, other issues raised included opposition to the extension of the congestion charge in Kensington and Chelsea, concerns about the impact of increased charges on self-employed/trades people/SMEs and those on a low incomes.

A further 28 responses did not use the templates but either copied the campaign group into their response or were clearly making one or more of the campaigns arguments. Of these, the additional issues raised which were additional to the campaign points included:

- Concern about the impact on those visiting London and Londoners using cars to make trips outside of London
- Concern about the impact on trades people, SMEs and success of high streets
- Concern about impact on people with low income
- Concern about public transport not being appropriate for all type of journeys or for all people
- Concern about the cost of public transport
- Concern about congestion caused by cycling infrastructure
- Suggest a big improvement will be required in public transport to encourage behaviour change
- Suggest improving parking availability at stations to encourage use of public transport

### **3.4.3 ZipCar**

We received 62 responses as part of this campaign. The template text for the ZipCar campaign is below:

As a member of ZipCar, I would like to see greater provision for and support of car clubs and car sharing in the Mayor's Transport Strategy. I believe car sharing delivers positive behaviour change that can help address some of London's immediate challenges such as air quality and traffic congestion.

Of the responses, 44 used the template. The other 18 used part of the template or changed the wording, but made identical points, 12 of these also added additional points. The additional issues raised included geographically specific points and statistics on the advantages of car club use other points were:

- Suggest more ambitious measures are needed to tackle pollution
- Suggest better cycling infrastructure is needed to encourage cycling
- Suggest quicker implementation of infrastructure to support electric vehicles

### **3.4.4 Mums for Lungs**

We received 54 responses as part of this campaign. The template text for the Mums for Lungs campaign is below:

Air quality is the most pressing environmental threat to the future of all Londoners, especially babies, children and other vulnerable people. 9,000 Londoners are dying prematurely every year; children are affected by stunted cognitive development, reduced lung sizes and other preventable illnesses. Many of us see our children coughing frequently, which doctors have diagnosed to be caused by the horrendous levels of pollution in London (despite coming from smoke free homes). This is simply unacceptable!

I welcome your Transport Strategy but urge you to make one goal your overarching priority:

**Ensure that the air in London is healthy and safe to breathe (by EU-standards) within your tenure by 2020.** Only this will ensure that the current generation of London's babies, children and all other residents can recover from the many years of toxic pollution.

Our children's health and reducing air pollution has to be your main priority for your current tenure and I ask you to implement any measures that are required to achieve that.

As you explained in your election campaign: "Environmental checks are not simply a side concern to be weighed up against economic and social benefits."

I look forward to hearing from you directly and through the community group I support, Mums for Lungs, about how you will adapt the Transport Strategy to ensure London becomes a healthy city to live in for all of us by 2020.

45 of the responses used the template and a further nine used the template but added additional information such as their geographic location or details about their families. Of these nine, three also referenced two linked campaigns – 'Positively Chronic' and 'Stop Killing Londoners- Cut Air Pollution'.

### **3.4.5 Stop Killing Cyclists**

We received 16 responses as part of this campaign. The template text for the Stop Killing Cyclists campaign is below:

On behalf of Stop Killing Cyclists 6,000 members, I would like to submit the following response to the Mayor's Cycling Strategy. Overall, they very much welcome the radical pro-cycling proposals contained in it and call for them to be implemented as fast as possible and for an adequate budget to be allocated to its implementation ie at least £500 million per year by 2020.

There are however a number of issues contained which are objected to or which should be included but are currently missing.

**I welcome:**

1. New significantly expanded protected cycle highway network + Quietway network.
2. Liveable Neighbourhoods to be principle underlying future for roads across London i.e. Mini-Holland or home-zone neighbourhoods approach.
3. 20 mph limits but want these to be on all roads other than motorways and major A roads.
4. The proposals for road pricing.
5. The proposals for pollution charging.
6. The safety regime for HGVs but would like it to be speeded up.
7. Commitment to zero deaths from buses by 2030 and all vehicles by 2041 but would like it speeded up.
8. Opposition to expanded Heathrow Airport which would stop increase in road pollution.
9. Proposal to seeking regulatory powers over phvs and uber. Their numbers need to be radically reduced.
10. Proposals to have new car-free spaces, squares and streets across London.
11. Proposal to remove vehicular traffic from Oxford Street and excitingly the commitment to tackle Parliament Square.
12. Proposal to have car free days across London.
13. Proposal role for consolidation centres to reduce congestion in central London.
14. Proposal date for ending fossil-fuel powered cars in London but should be brought forward, likewise deadlines for phasing out fossil fuel powered buses and cabs.

Items opposed or believed to need addressing in the Strategy:

1. The transformation of London to implement Mayor's vision will take billions. But biggest proposed capital expenditures are still the old big transport capital projects i.e. Crossrail (£32 billion), Bakerloo line extension (£3.1 billion) and Silvertown tunnel (£1 billion).  
Yet despite the Mayoral stating that active travel is at the heart of his vision for London, only tiny £130 million/year is proposed for cycling investment.  
The building of the cycle-network must be prioritised for capital expenditure and timing. We call for £0.5 billion/year to be invested annually by 2020.
2. The strategy should not support a car based Silvertown tunnel, rather it should be than public transport / bike crossing, but if it does go ahead, both it and Blackwall Tunnel need congestion charging introduced.
3. The strategy should not support City Airport expansion, it will worsen transport pollution killing people cycling.

4. The strategy needs to plan on how to radically reduce mini and black-cab usage in Central London.

Even new EV cabs will have 75% of particulate pollution that current cabs have and they take up a huge amount of space in central London needed for active travel and buses.

An estimated 40% of all vehicular traffic in central London during cczone hours are cabs (mc+bc).

The Mayor should impose a congestion charge on all minicab + black cab customers and encourage central London businesses to get their staff to use active travel and public transport for in-work travel.

5. The strategy should promote London's only zero pollution cabs i.e. pedicabs . The mayor should introduce pedicab stands in central London and at train stations.

6. The Mayor should encourage public services to switch staff work travel to bikes.

7. Mayor should encourage the switch to using cargo bikes to replace white-van deliveries, whose use is exploding and major new cause of congestion

8. Whilst we welcome the commitment to Oxford Street pedestrianisation has obscure phraseology. Likewise, the very welcome Parliament Square proposals. These need to be traffic free areas, safe and pollution-free for people walking /cycling.

9. The phasing out of fossil fuel powered cabs refers to zero emission capable. It should be zero emission.

10. The strategy needs to set out how London will produce the huge amount of clean renewable electricity needed for zero emission electric public transport and essential delivery/emergency vehicles etc.

11. The phase in of the welcome safer design regulations for HGVs should be faster. Every year is another year of preventable deaths.

12. Recognising that the Mayor has only legal authority over 5% of London's roads, ie the main trunk routes and that the 32 Boroughs have full legal control over all the rest, it is crucial that the Mayor devises strategies to prevent cyclophobic boroughs and local councillors block good quality safe cycle highways and Quietways. To do this, the Mayor should publish an annual cycling safety performance league table comparing progress in all 32 boroughs.

He also needs to convene an annual borough cycling summit, for all the borough leaders, responsible cabinet members and heads of borough transport departments.

13. The Mayor should restore the Western Extension of the congestion charge zone and use monies raised to fund speeded up implementation of the protected cycling proposals. There are literally thousands of dangerous junctions that need urgent Dutch level safety refurbishments.

Of the responses, 10 used the template and a further 6 edited the template with personal information or made small changes to the template text. No substantive additional points were raised.

### **3.4.6 Transport for All**

We received four responses as part of this campaign. While they did not follow a template they all endorsed the response submitted by Transport for All. A summary of this can be found in Appendix N. Their response called for the following:

- Set a timeline for 100 per cent step free access
- Commit to turn-up-and-go
- Make a plan for invisible impairments
- Prioritise bus passenger safety
- Make cycle lanes work for everyone
- Guarantee door-to-door services for those who need it
- Ensure that disabled passengers can still use cars when they need them
- Make Oxford Street accessible
- Design London's buses to have space for everyone

## **3.5 Casework – Masthouse Terrace Pier**

Throughout the consultation we received 59 emails from members of the public concerned about the omission of Masthouse Terrace Pier from the map (figure 47) on pages 230-231 of the draft strategy. We confirmed to these respondents that this was an error and would be corrected in the final strategy.

# Chapter 4 - Responses to the closed consultation questions

## 4.1 Summary of all closed consultation questions (public)

This section describes the outcome of the 14 closed questions we asked those that identified themselves as responding as an individual (the 'public' responses).

The majority of public respondents completed the consultation online (94 per cent), and so responded to the closed consultation questions.

The majority of responses received from stakeholders were provided in writing rather than via the online consultation questionnaire. As such, closed questions were not completed by the majority of stakeholders. We have therefore not reported on the results as they can not be considered representative of all stakeholders' views..

## 4.2 Overview

46 per cent of public respondents said they strongly agreed, and a further 22 per cent said they partially agreed, with the overarching vision and central aim of the strategy - that by 2041, 80 per cent of Londoners' trips will be on foot, by cycle or using public transport.

There were high levels of support for the key aims of the strategy, most notably:

- Improving the overall accessibility of the transport system
- For no-one to be killed by a bus and for all death and serious injuries to be eliminated by 2041
- For all buses to be zero emission by 2037, for all vehicles to be zero emission by 2040 and for the entire London transport system to be zero emission by 2050

However, there was a notable level of disagreement with the aim that by 2041 Londoners should be doing 20 minutes of active travel each day. This is expanded on in responses to open questions, with concerns about active travel not being possible for everyone and questions about the appropriateness of a transport strategy setting health targets.

There were similar levels of support for the key areas of the strategy, with over a third of respondents strongly agreeing, and a further 25-30 per cent partially agreeing, that the draft MTS would improve transport in a number of key areas.

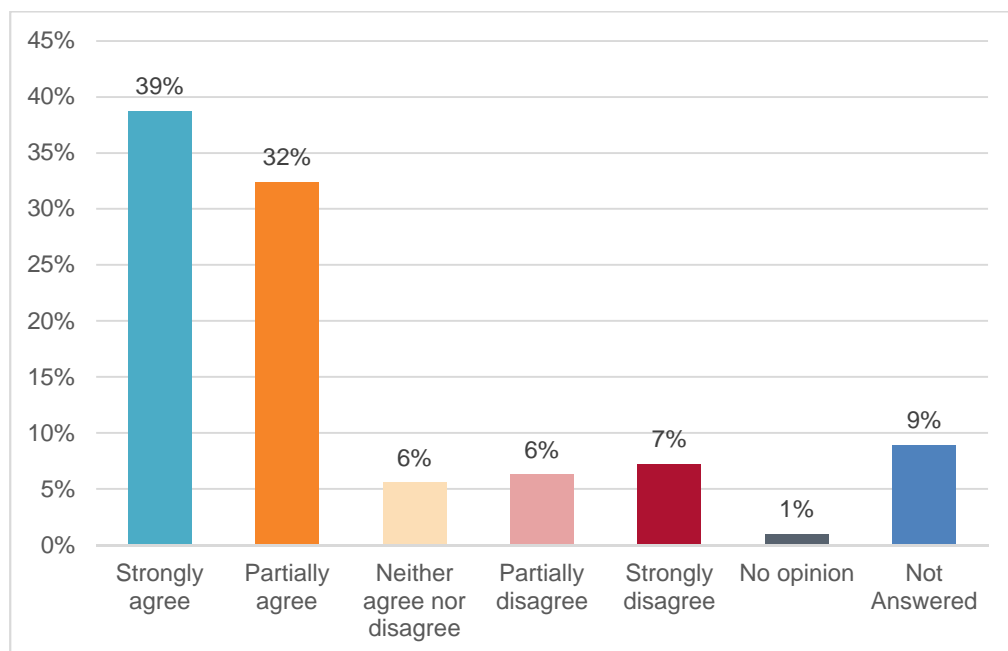
There was one particular discrepancy to this pattern in response to the question about the Mayor's proposed approach to road user charging (proposals 18 & 19).

Although the number that strongly agreed with the approach was similar to other areas, those that partially supported was lower and those that opposed was almost double any other area of the strategy at 17 per cent.

Please note that in the following tables the percentages have been rounded. For them to add up exactly to 100 per cent we would need to display up to two decimal points.

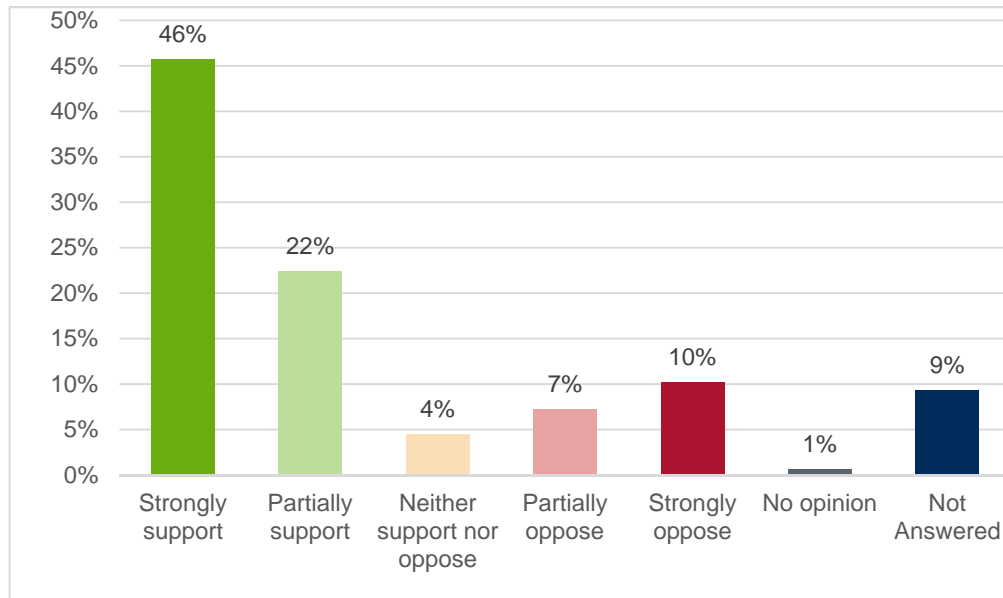
### 4.3 Summary of responses to Question 1: challenges

We asked respondents to tell us whether they agreed or disagreed that the correct challenges have been identified.



#### 4.4 Summary of responses to Question 2: vision and central aim

We asked respondents to what extent they supported or opposed the proposed vision and central aim.





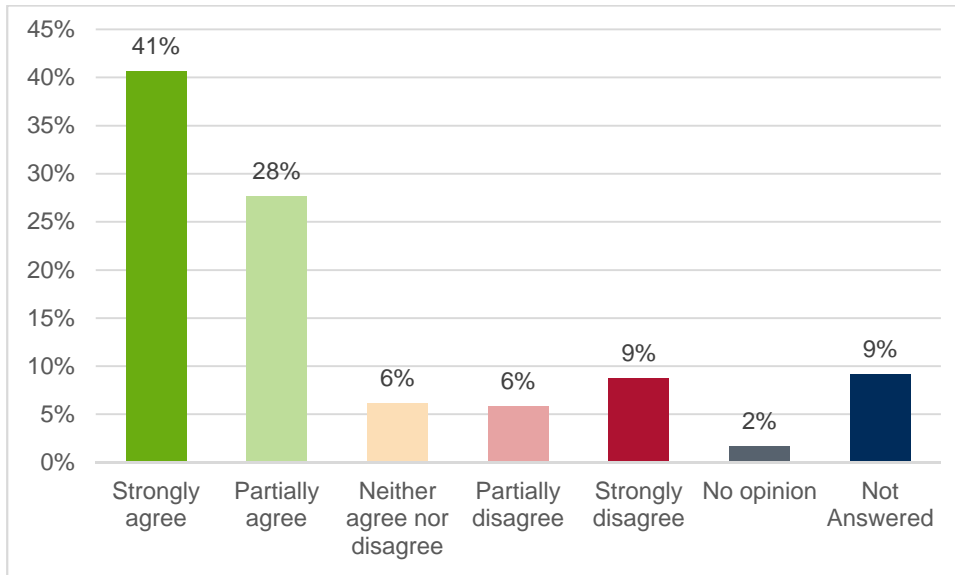
## 4.5 Summary of responses to Question 3 - aims

We asked respondents to what extent they agreed or disagreed with the proposed aims:

	Strongly agree	Partially agree	Neither agree or disagree	Partially disagree	Strongly disagree	No opinion	Not answered	Total
By 2041 for all Londoners to do at least 20 minutes of active travel they need to stay healthy each day.	2,902 (47%)	1,148 (19%)	512 (8%)	281 (5%)	644 (11%)	88 (1%)	535 (9%)	6,110 (100%)
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	3,823 (63%)	738 (12%)	380 (6%)	197 (3%)	337 (6%)	93 (2%)	542 (9%)	6,110 (100%)
For all buses to be zero emission by 2037, for all new road vehicles driven into London to be zero emission by 2040, and for London's entire transport system to be zero emission by 2050.	3,809 (62%)	869 (14%)	260 (4%)	231 (6%)	365 (6%)	48 (1%)	528 (9%)	6,110 (100%)
By 2041, to reduce traffic volumes by about six 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.	3,284 (54%)	1,048 (17%)	346 (6%)	305 (5%)	515 (8%)	67 (1%)	545 (9%)	6,110 (100%)
To open Crossrail by 2033.	2,992 (49%)	1,007 (16%)	780 (13%)	172 (3%)	336 (5%)	234 (4%)	589 (10%)	6,110 (100%)
To create a London suburban metro by the late 2020s, with suburban rail services devolved to the Mayor	3,037 (50%)	1,163 (19%)	553 (9%)	216 (4%)	422 (7%)	154 (3%)	565 (9%)	6,110 (100%)
To improve the overall accessibility of the transport system including, by 2041, halving average additional time taken to make a public transport journey on the step-free network compared to the full network.	3,473 (57%)	1,172 (19%)	492 (8%)	137 (2%)	181 (3%)	100 (2%)	555 (9%)	6,110 (100%)
To apply the principles of good growth	2,972 (49%)	1,131 (19%)	806 (13%)	103 (2%)	188 (3%)	299 (5%)	611 (10%)	6,110 (100%)

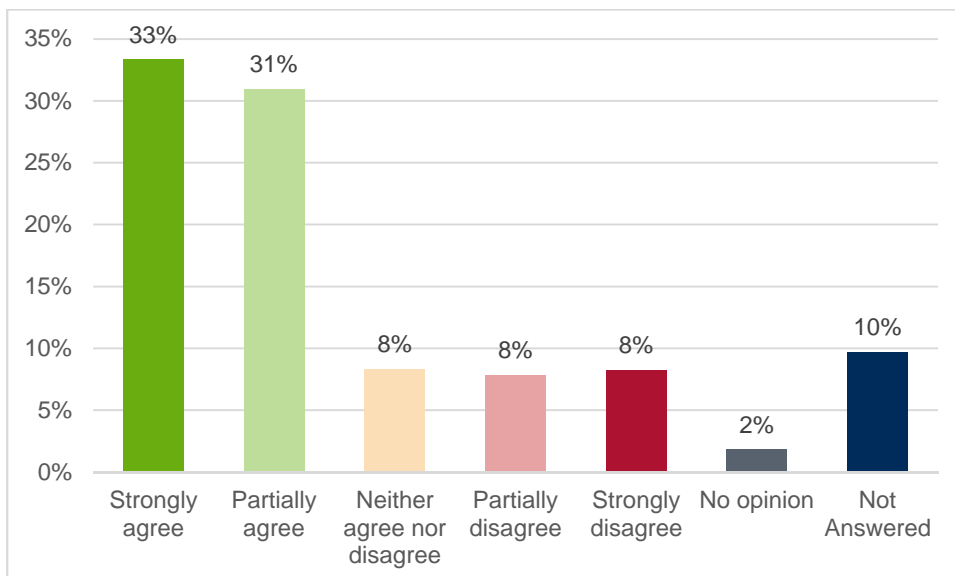
#### 4.6 Summary of responses to Question 4: improving the experience of pedestrians and cyclists

We asked respondents to what extent they agreed or disagreed that the proposals set out in 'Healthy Streets and healthy people' will improve the experience of pedestrians and cyclists using London's streets.



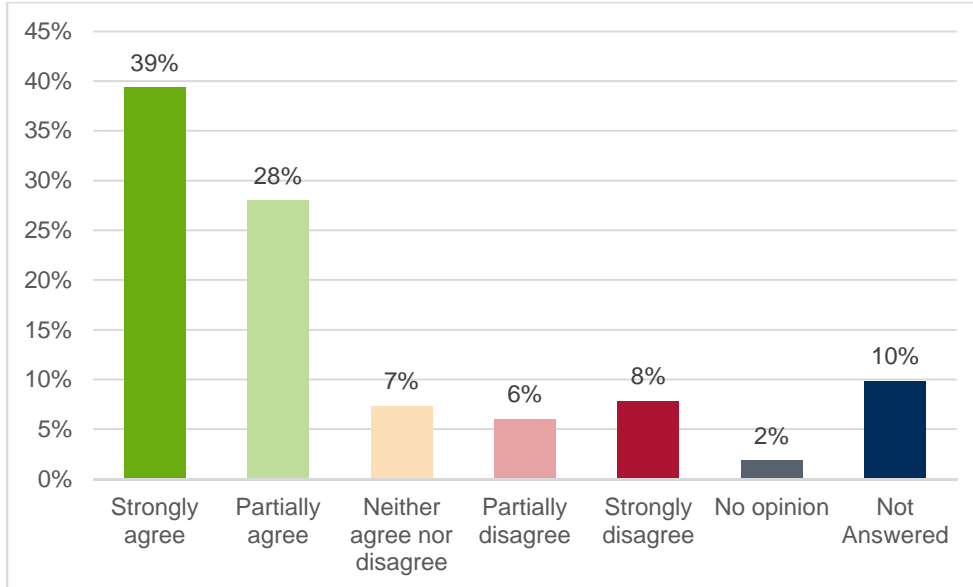
#### 4.7 Summary of responses to Question 5: reducing road danger

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would reduce road danger.



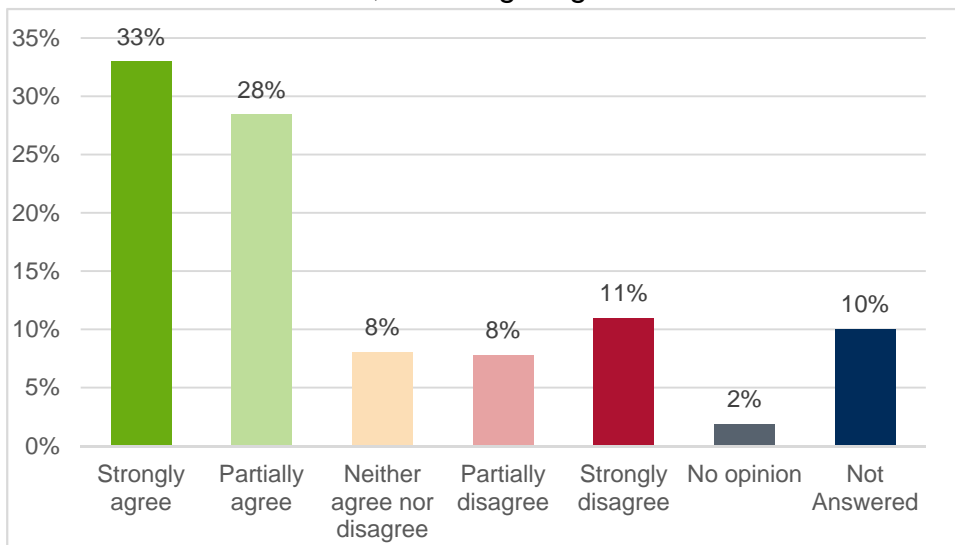
#### 4.8 Summary of responses to Question 6: reducing emissions

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city.



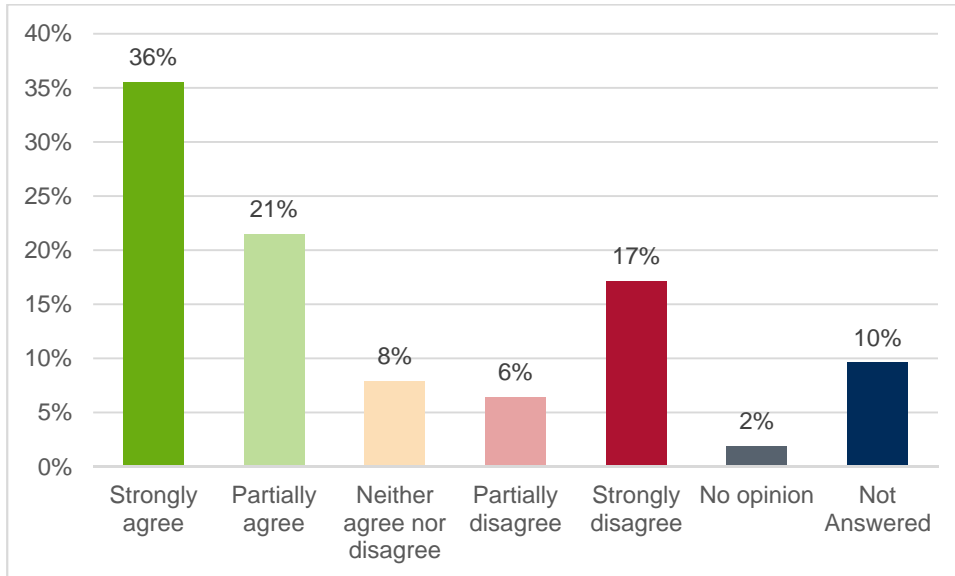
#### 4.9 Summary of responses to Question 7: tackling congestion and improving the efficiency of streets

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would tackle congestion and improve the efficiency of streets for essential traffic, including freight.



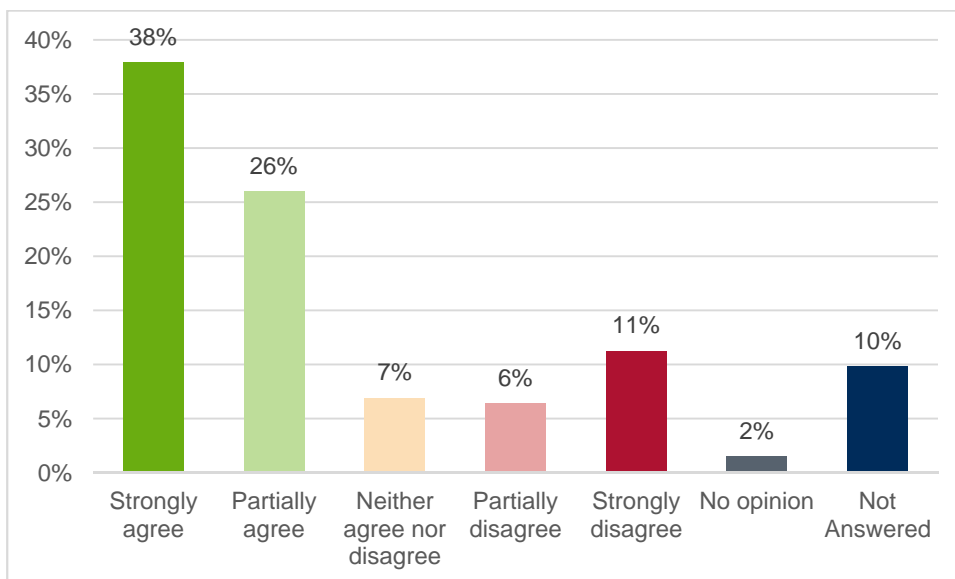
#### 4.10 Summary of responses to Question 8: road user charging

We asked respondents to what extent they agreed or disagreed with the Mayor's proposed approach to road user charging (such as amending current schemes to ensure they remain effective and exploring new schemes that reflect factors such as distance travelled, time taken or emissions produced).



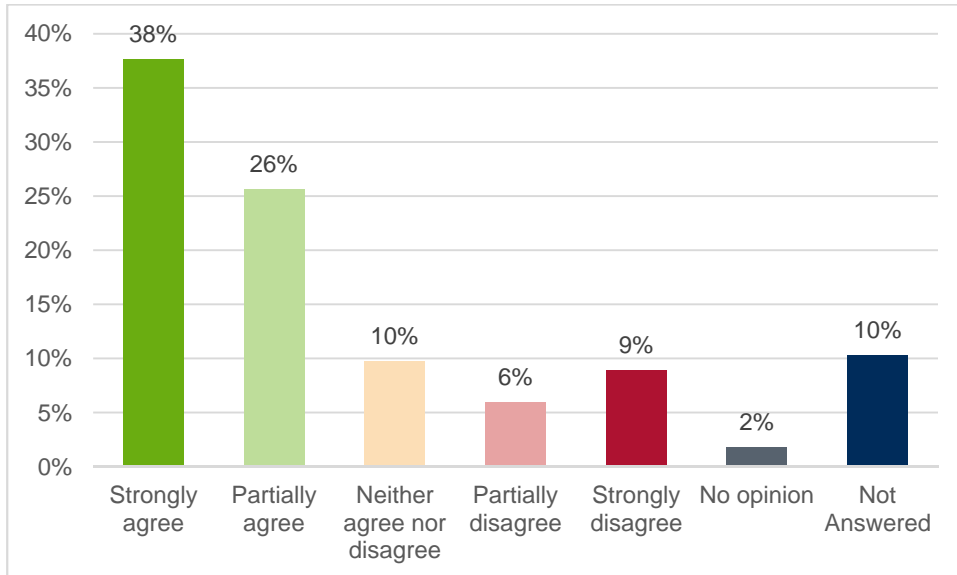
#### 4.11 Summary of responses to Question 9: whole journey experience

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would provide an attractive whole journey experience that would make onward journeys by walking, cycling and public transport as straightforward as a trip by car.



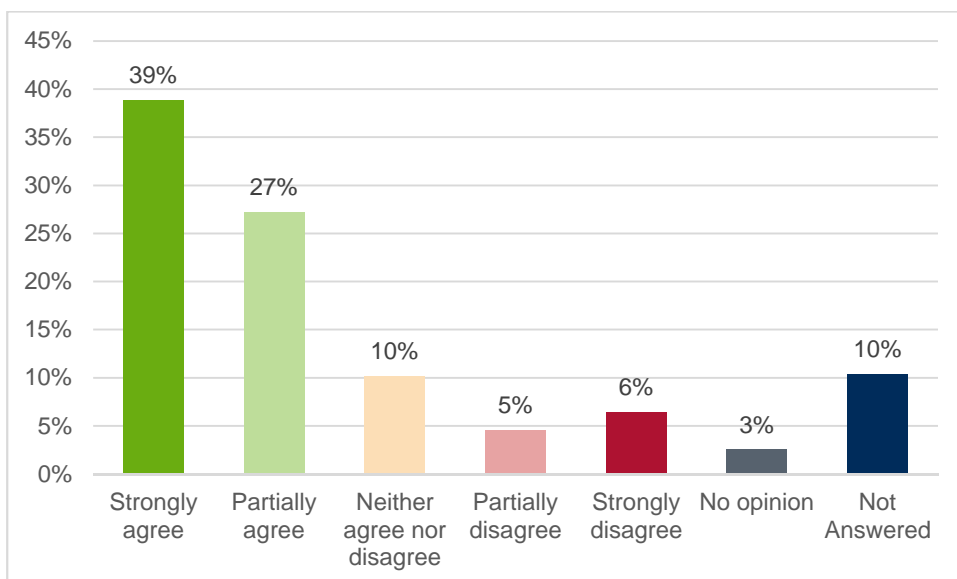
#### 4.12 Summary of responses to Question 10: affordability and customer service

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would ensure public transport is affordable and customer service is improved.



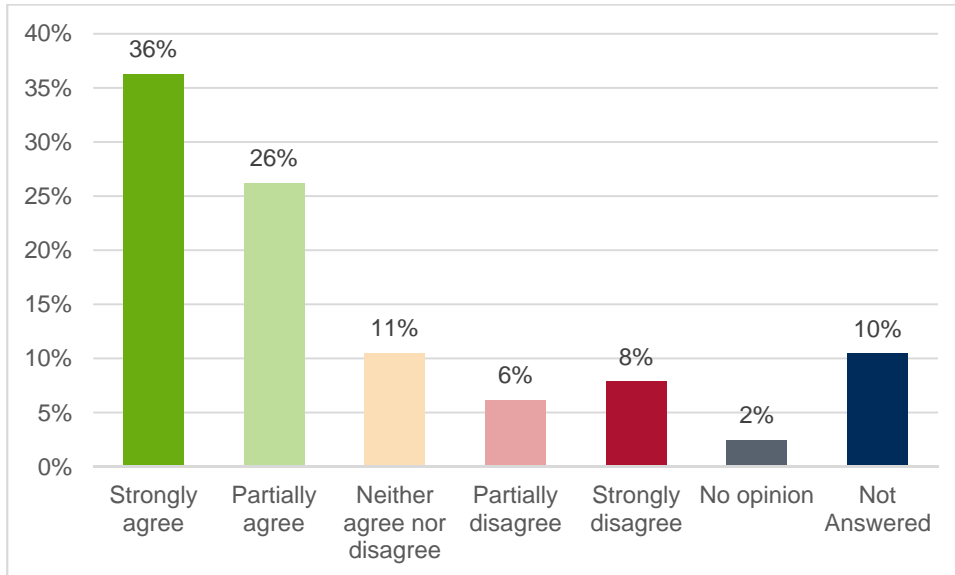
#### 4.13 Summary of responses to Question 11: accessibility

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would improve the accessibility of the transport system.



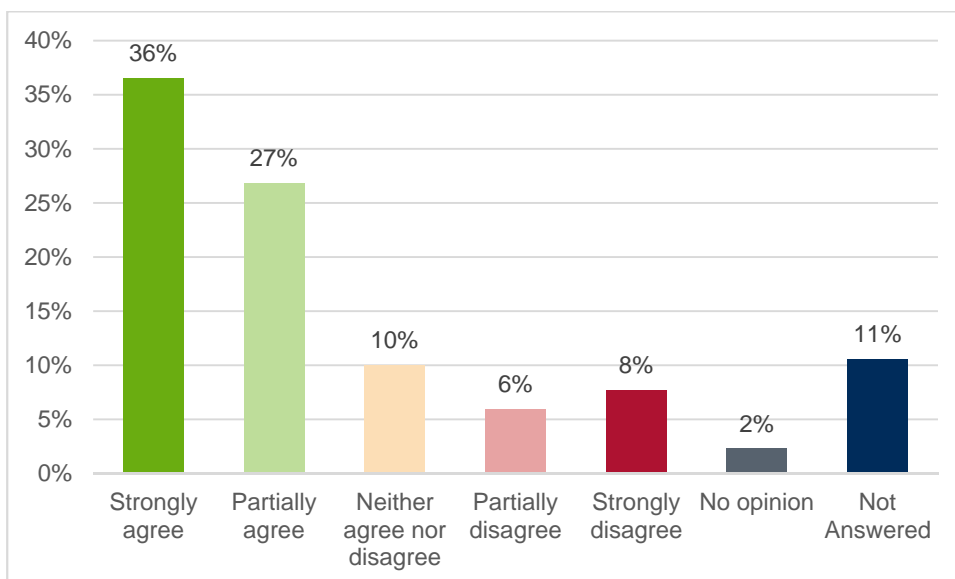
#### 4.14 Summary of responses to Question 12: transforming the bus network

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would transform the bus network to ensure it offers faster, more reliable, travel where it is needed.



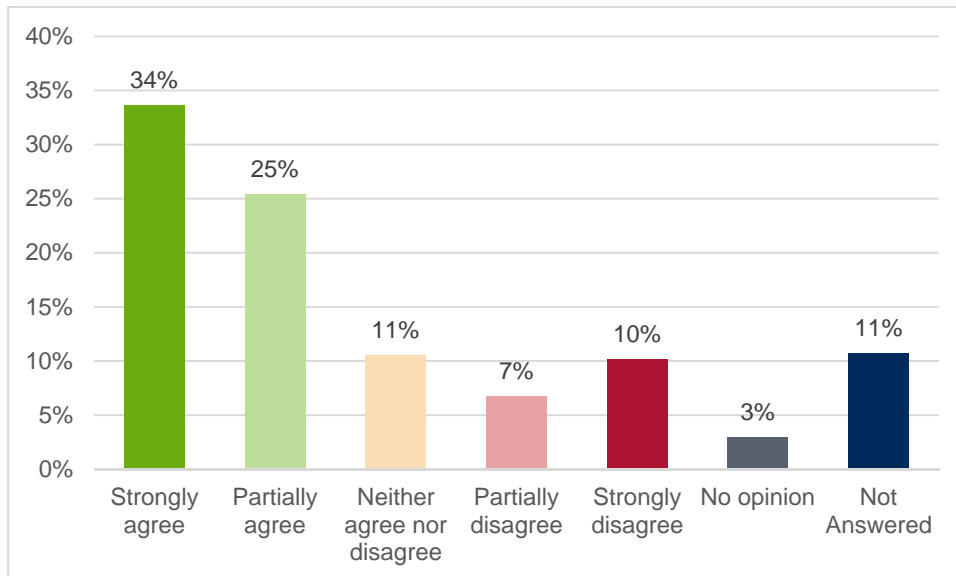
#### 4.15 Summary of responses to Question 13: improving rail services

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would improve rail services by improving journey times and tackling crowding.



#### 4.16 Summary of responses to Question 14: supporting the development of new homes and jobs

We asked respondents to what extent they agreed or disagreed that the Mayor's draft policies and proposals would ensure that transport supports the development of new homes and jobs so that current and future Londoners become less dependent on their cars to get around?



# Chapter 5 - Deliberative workshops

## 5.1 Introduction

This section provides an overview of the key outputs from the four deliberative workshops held during the consultation period. The full report of the sessions is available in Appendix G.

## 5.2 Overview

Deliberative events were run as part of the public consultation exercise to ensure that a diverse range of people, who could be seen as a credible representation of Londoners, had their say.

Holding deliberative workshops was a way to address the risks associated with self-selection of participation in public consultation exercises, which often results in an over dominance of response from certain groups and / or those with particular interests. Indeed, the response profile for the public consultation shows a dominance of white, male respondents.

It also allowed us to carry out a more considered engagement with Londoners. Given the scale of the strategy, the deliberative workshops allowed time and space for people to understand the strategy and ask any questions before they responded.

The key themes that came from the discussions are summarised below. These outputs have been included alongside the analysis of the written responses from the public and are detailed in the next chapter.

## 5.3 The challenge and the vision

London's growing population and the resulting pressures on infrastructure and individuals was recognised and is a daily reality for most. Participants also acknowledged that the situation will get worse unless action is taken and were pleased to see the Mayor stepping up to the task. There was a high level of support for the Mayor's vision, with participants agreeing that the status quo needs to change.

While participants were quick to recognise the outcomes of London's challenges – polluted city, congested roads, crowded transport – they were less cognisant of the causes and their individual sense of contribution. They prioritised solutions like improvements to London's streets and public transport environment to encourage people away from cars.



While participants liked the idea of a less car-dependant London they were wary about the role of individual behaviour change and believed a major shift was needed. They questioned whether the strategy had fully accounted for entrenched habits and social norms that underlie car dependency, and whether the scale of change required is achievable.

The aim for every Londoner to do at least twenty minutes of active travel per day also concerned participants as they did not necessarily equate active travel with exercise.

The Challenge	Theme	Missing challenges
<b>Streets and Cars</b>	Congestion and car dependency	Addressing the “car is king” culture
		Inactivity crisis not clearly linked to transport
	Street design	Safer cycling
<b>Public transport and quality of life</b>	Unreliability, crowding and unpredictable journey times	Fix basics first
		Safety and security for all is a barrier to public transport use, walking and cycling
	Parts of Outer London are cut-off with poor transport links	Bus routes that meet local demand
	General observations	Cost is a major barrier to use of public transport
		Respecting others
Ban smoking in public		
<b>Future Growth</b>	A London that works for everyone	Meeting the needs of current Londoners
		Keeping pace with innovation

The Vision	Aim	Key concern/issues with vision and aims
Planning London's streets	Central aim	Increased strain on public transport created by mode shift
	20 minutes active travel	Tension between the idealism of the vision and the reality of every day travel
		Driving believed to be more cost and time effective
		Not fair for certain groups of people
		People should be able to choose how they travel
		Not everyone wants to exercise or do so by active travel
		Change London's transport and street contexts first
		Is there a role for financial incentives?
	Vision Zero	Early intervention is also key
	Zero Emissions	Improve air quality more generally
Speed the process up		
Reduce traffic volumes	How do we achieve reduced traffic without regulation?	
Improving public transport	Crossrail 2	More connectivity for South London
	London suburban metro	More services not just improving existing ones
		Fairer coverage of night services
Improve accessibility	Do accessibility plans go far enough?	
Good growth	Encourage responsible local housing and business development	Ensure affordability

## 5.4 Healthy Streets and healthy people

Participants were excited by the proposals set out in 'Healthy Streets and healthy people' as they felt that they tackle issues highly relevant to Londoners today. Safety was a priority and some worried that existing plans did not go far enough to ensure Londoners would feel safe from crime in local areas. Participants were worried about whether plans had accounted for the threat of terrorism and travelling around at night. Better road safety was also a key concern and participants wanted "proper road segregation" for cyclists.

There was resistance to the perception that the strategy was dictating how they would choose to travel and a discomfort with seemingly moralistic overtones. Participants wanted to make sure the strategy catered for individuals who are reliant on their cars for mobility.

Plans to tackle air pollution and create a zero carbon city were supported. Participants liked the fact TfL was leading the way, believing it was a fair and

effective way of prompting wider cultural shift. However, they believed zero emission timescales could be more ambitious.

Healthy Streets and healthy people	Strategy sub-section	Key concerns
Active, Inclusive and safe travel	Improving walking and cycling environments	More effort needs to be put into making London nice
		More segregation is needed on London streets
		Plans need to be more universal and local
	Greater human presence needed on London streets	
	Getting all Londoners Walking and Cycling	Wider promotion needed of active travel message
Vision Zero to tackle road danger		More local approaches to speed reduction may be required
		More commitment to pedestrian safety is needed
		Good road segregation is vital for feeling safe on London roads
		We <u>all</u> need to learn and re-learn road behaviours
Improving personal safety and security		Plans need to be more ambitious to make London's streets safer and more secure
		Cuts to TfL staff and police cast doubt on crime protection plans
		Local safety and anti-social behaviour need policing too
Making more efficient use of street network	Efficiency of deliveries and servicing	Small and medium-sized enterprises (SME) may be unfairly impacted
Changing the way we pay for roads and borough traffic reduction		Road-user charging may negatively impact those on lower incomes
Improving air quality and environment	Reducing harmful air pollution from road transport	Timescales should be more ambitious
		Public awareness of the damaging effects of car use needs boosting
		Car-sharing schemes could be more actively encouraged
	Focus on natural and built environment	Crossrail and future transport developments could negatively impact on green space

## 5.5 A good public transport experience

Participants backed the proposals within 'A good public transport experience', and were reassured by the Mayor's commitment to make the transport system better and improve connectivity. However, there were concerns that what the strategy proposed will not be sufficient to meet future demands on the system caused by population growth and reduced car use. Failings of the current system also undermined trust in the Mayor's ability to deliver something better in the future.

There were many concerns related to "fixing the basics" – ensuring the daily reality of people's travel experience was bearable, that the environment was comfortable, clean and safe. Participants who were residents of south London in particular prioritised connectivity and extended services as they currently felt cut-off and under-served. Ambitious plans to deliver Crossrail and HS2 only exacerbated this, as many felt they would not benefit from these schemes.

Affordability was important but there were mixed views about what it meant and whether public transport could match the perceived affordability and cost-effectiveness of driving, especially for family travel.

Safety on public transport and, in particular, travel at night was a key issue and many worried that perceived "recent cuts to staff and police" made it hard to guarantee a safer system. They felt that the Mayor's commitment to provide better customer service was missing a commitment of greater staff presence and face-to-face contact.

Participants felt step-free access to the network should be implemented across a much bigger range of stations. They also wanted the Mayor's plans to encompass a broader definition of accessibility, including people with sensory and temporary accessibility needs like families with young children, customers carrying shopping and shift workers.

A good public transport experience	Sub-section	Key concerns
The Whole Journey		Make it universal and fair
Improving Affordability and Customer Service	Enhancing customer service	Need to improve pleasantness and convenience of the public transport experience
		Fix the basics (e.g. cleanliness, ambient temperature etc)
		Promote a wider culture of care and respect
		Safer travel on night services
		Face-to-face contact is key to good service public transport
	Tensions between improving customer service with staff cut backs	
	Making public transport more affordable	Improve cost-effectiveness and value for money of public transport
	Fares should be reduced not just frozen	
Improving Public Transport Accessibility		Whole network needs to be accessible
		Better provision for hearing-impaired customers
		Broader definition of accessibility is required
Improving Rail Services and Tackling Crowding		Need more ambitious, universal plans to tackle crowding across London
		Safer rail travel at night
		Express services for Outer London
Shaping and Growing the Bus Network	Planning the bus network	More bus provision for Outer Londoners
		Extend night bus services for Outer London
	Improving journey time and reliability	Improve safety and security on buses
		Tension between bus priority and road congestion
Improving the Connectivity of the Public Transport System		Need to ensure fairer coverage across London
		The Elizabeth line will bring even more demand and pressure on the system
		Improve connectivity to outside London
		More river services for commuting and leisure

## 5.6 New Homes and Jobs

Participants supported plans to improve transport services and connections to make underdeveloped parts of London viable places to build homes and create jobs.

Concern around affordability remained, with many assuming that better transport links and regeneration would lead to rising property and rental prices. Participants

were concerned that current residents would be pushed out to areas with poorer access to transport.

With regard to densification, participants were worried about resident safety and overcrowding. Participants were ambivalent about mixed-use developments and were worried that businesses would move in that were either too expensive for locals or were inappropriate and anti-social, for example betting shops.

New homes and jobs	Strategy sub-section	Key concerns
Shaping the type of growth	Improving access to public transport	Better transport access makes an area less affordable
		Improve access across London
	Embedding active travel in new development	Need to address fear of crime
		Oppose demonization of cars
	Plans to promote active travel are not radical enough	
Shaping the city	Using transport to support and direct good growth	Is mixed-use/densification desirable?
		Londoners may not benefit from mixed-use developments
	Unlocking growth potential through new rail links	New rail links do not benefit existing Londoners
	Unlocking growth potential through improved rail services	Better connectivity needed for South London
Unlocking growth potential through improved bus services		
General observations		Who pays? Concerns burden will fall on current Londoners.

## 5.7 Conclusion - a step in the right direction

While the deliberative events highlighted concerns about the transport strategy, they also demonstrated clear support and enthusiasm for the Mayor's plans.

Where there were concerns, it was often due to worries about achievability rather than ideological opposition. Participants worried that the Mayor had not factored in the size of the shift in behaviour that was required to reduce car use. They were also sceptical about whether proposed infrastructural changes would come to fruition given the service they experienced day-to-day.

## 5.8 How does feedback compare to the response from the on-line questionnaire

There was a higher level of support for the Mayor's vision at the deliberative workshops, with an increase of over 10 per cent from the on-line questionnaire. Levels of support expressed in the closed questions for individual elements were typically between 10-20 per cent higher from participants in the deliberative events. There were three areas where support was the same rather than higher - in response to zero emission and zero carbon proposals, and also the active travel aim.

There were two notable discrepancies - road user charging and the whole journey experience. There was 10 per cent less support for the Mayor's approach to road user charging than typically expressed in the on-line survey and 20 per cent more disagreed that improving the whole journey experience would make onward sustainable travel options as straight forward as car trips.

Participants raised many similar issues to those highlighted through the on-line survey process. However, there were a number of issues that appeared more strongly in the deliberative events:

- More needs to be done to address personal safety (sense of vulnerability) on public transport and on streets as this is currently a barrier to use
- The strategy needs to better acknowledge the level of engrained behaviour shift that will be required to reduce car dependency
- The strategy needs to ensure it also focuses on getting the basics right with current public transport provision (cleanliness / comfort / addressing anti-social behaviour) to make it more attractive than using the car
- The strategy should acknowledge that good customer service has a human element and cannot be met by technology alone – the strategy needs to address how customer service can be improved in the light of staff cutbacks
- The strategy needs to acknowledge that the cost of public transport is a barrier to use (particular calls for fare reductions not just freezes)
- Wider definition of accessibility is required – to cover cognitive and other sensory issues as well as young families
- Improvements must be fairly distributed throughout the capital (including improving orbital and night time public transport provision in outer London)

## **Chapter 6 - Summary of comments made and recommended revisions**

This section provides an overview of the key issues that have been raised in response to the consultation on the draft MTS.

It brings together comments from stakeholders, the public and businesses. It contains issues that have been commonly raised during our review of the analysis of the public open question responses, stakeholder open question responses and all written responses, along with the outputs from the deliberative events and stakeholder workshops.

In structuring the issues, comments have been attributed to the most pertinent aspect of the strategy and we have produced an overview of issues raised for each key section of the strategy.

Each section documents the number of comments categorised as in support, those with concerns/in opposition and those which make suggestions for change. Please note that the concern category was applied to comments where people felt the strategy was not ambitious enough and also where they had issues with the policies and proposals themselves.

We have included the counts to demonstrate levels of interest in that area of the strategy. The counts provided for the types of comment listed in the chapter reflect the number of comments made and not the number of respondents who raised the comments. In addition, some of the responses received (particularly from the public) covered a range of issues including concerns about the current transport system. Therefore some of the comments categorised as 'concern' or 'suggest' were comments about the current transport system and not about the proposals within the MTS itself.

All policy, proposal and figures numbers in this chapter refer to the draft MTS. Such numbers will change in the final strategy.



## 6.1 Chapter 1: The challenge

### **Comments in support**

Challenges as identified were generally well supported. We received 124 supportive stakeholder and business and 189 public comments. Comments particularly supported:

- Identification of congestion, air pollution, changing demographics (especially the aging population) and road danger as key challenges for the transport system
- Support for the focus on health

### **Comments noting concerns or opposition**

We received 103 stakeholder and business and 694 public comments identifying concerns with the challenges outlined. Particular areas of concern included:

- Concern that there should be more emphasis on the challenges of:
  - congestion and air quality;
  - the pressures population growth is placing on the system
  - the different challenges facing inner and outer London
- Concern with the population forecasts used
- Concern that people should have free choice in choosing travel and that the car should be seen as a solution in the face of growing population and an overcrowded transport network
- Concern that levels of car ownership rather than car use should be the focus
- Concern about the challenge of the current bias in the system in favour of motor traffic
- Concern that proposals will change / be scrapped with subsequent Mayoral transport agendas

### **Comments making suggestions**

We received 182 stakeholder and business and 77 public comments identifying additional challenges that should be considered. Key requests included:

- Need to better recognise the challenge of creating behaviour change from the car to active travel choices – recognising both mental (personal preference / free choice) and physical barriers (lack of infrastructure / maintenance and cleanliness / safety and security / cost of public transport)

- Creating a culture of respect - anti-social and ego-centric behaviour on public transport / in public spaces is a barrier to use
- Better recognition of the challenges facing disabled travellers (physical, sensory and cognitive)
- Pressure that the centralisation of employment places on the transport network and opportunities / risks of changing employment patterns
- Challenge in managing freight and delivery of goods (especially consumer expectation)
- Reference to the funding challenge transport faces should be included
- Better recognition of growing social and economic inequality
- The political challenge of delivering across boroughs and over time through successive administrations
- Recognition of challenges facing the areas adjacent to London
- Risk and opportunity that new technology represents (especially for congestion and road charging)

### **TfL response and recommendation**

#### **Challenges**

Congestion, air quality and population growth are identified as key challenges facing London throughout the strategy. Air quality in particular is also picked up as a central issue in the London Environment Strategy. It is felt that the strategy as it stands clearly identifies these areas as central challenges to London's future and also sets out a range of policies and proposals to address these issues.

The strategy acknowledges that different approaches will be needed in different parts of the city and sets out a vision for the future of central, inner and outer London in Chapter 2 and in Chapter 6.. Throughout the strategy reference is also made to the different challenges facing different parts of the city and acknowledges the different types of approach that will be needed across the city.

**TfL recommends no change to the strategy in response to these comments.**

#### **Population forecasts**

Population forecasts in the MTS are based on the most up-to-date figures from the GLA Economics. The figures included in the draft strategy were the most up-to-date and accurate at the time of publication. Since publication of the draft strategy, revised figures have been produced and should be reflected in the final strategy.

**TfL recommends a change to the strategy to reflect publication of revised population forecasts since publication of the draft strategy.**

## **Individual choice**

The MTS sets an aim of 80 per cent of all trips in London to be made by active, efficient and sustainable modes by 2041. Achieving this aim will help address some of the most significant challenges facing London, including poor air quality, worsening traffic congestion, poor physical and mental health and the Londoners' overall quality of life. People are of course free to choose how they travel and the car will, in some cases, remain the most suitable mode for certain trips. However, changing the way people travel round the city is key to making London a more liveable city and making it easier and more attractive to travel round on foot, by cycle or by public transport will be essential if this aim is to be achieved. Adding more traffic to London's roads by encouraging greater car use is not a sustainable approach and would make people less likely to choose to walk, cycle and use public transport.

TfL recommends **no change** to the strategy in response to these comments.

## **Political cycle**

The MTS sets out a vision and approach to transport planning until 2041. This will overlap with multiple political cycles at local, regional and national level. It is inevitable that political control of the Mayoralty will change during this period. However, to ensure London's success, it is essential that a coherent long-term approach is taken. This is particularly important when trying to influence travel behaviours, deliver environmental improvements and plan and deliver large-scale infrastructure projects.

## **Recognising the challenge of mode shift**

TfL has undertaken extensive research on mode shift and propensity for people to switch modes as part of the development of the strategy. This research has been published alongside the draft strategy and is available online. Working with schools, communities, boroughs and other organisations will be key to encouraging people to think differently about how they travel around the city. TfL has also run a number of recent campaigns to try and promote more considerate behaviour on the public transport and road networks, and will continue to run evidence based campaigns of this type.

TfL recommends **no change** to the strategy in response to these comments.

## **Accessibility**

During the MTS consultation period TfL has engaged extensively with disability groups. In light of this, and feedback to the consultation, TfL recommends that the sections on accessibility be revised.

TfL recommends **changes to the narrative and Proposals 51- 52** as outlined in the relevant section of this report.

## **Employment growth and managing freight**

The London Plan sets the strategic direction for how London is planned and shaped. Although transport plays a vital role in supporting growth across the city and unlocking new areas for housing and jobs, much of the direction for this is taken from the work undertaken to develop the new draft London Plan.

Freight and delivery and servicing activity is identified as a key challenge in the Healthy Streets and healthy people chapter of the strategy. The challenges arising from freight are closely related to economic and population growth, identified as a challenge in the 'Future growth' section of Chapter one.

TfL recommends **no change** to the strategy in response to these comments. Changes are recommended as part of Chapter 3 (b) on the 'Efficiency of deliveries and servicing'. These recommendations can be found in the corresponding section of this consultation report.

## **Funding challenge and cross-borough / boundary delivery**

Chapter six of the strategy sets out how the strategy will be funded and acknowledges the challenges around this. It is felt that this is a more appropriate section for these challenges to be raised.

The MTS makes clear the need for the Mayor, TfL, London's boroughs and other delivery partners to work closely together to deliver the aims of the strategy. TfL in particular will be working closely with the boroughs to support the delivery of the strategy as well as with London Councils. There is also a commitment in the strategy to work more closely with neighbouring authorities on cross boundary issues. There will be on-going stakeholder engagement following the publication of the final strategy to ensure any future challenges can be overcome.

TfL recommends **no change** to the strategy in response to these comments.

## **Risk and opportunity of new technology**

Technology could help speed up the delivery of some aspects of the strategy, but could also have a negative impact in other respects. In light of consultation feedback, it is recommended that references to new technology be strengthened and clarified. These recommendations are outlined in the section of this report that addresses responses to Chapter six of the strategy.

TfL recommends **a change** to the strategy to highlight the effect that technology could have on the city.

## 6.2 Chapter 2: Vision and aims

### **Comments in support**

We received 149 supportive stakeholder and business comments and 1,525 supportive public comments showing support for the principles of the strategy, in particular:

- Active travel
- Mode shift to 80 per cent sustainable travel
- Switching to low emission vehicles (both public and private transport and private)
- Reducing car use
- Plans for suburban metro
- Devolution of rail franchises to the Mayor
- Delivery of Crossrail 2
- Principles of Good Growth
- Improved public transport in outer London / suburban areas
- Giving priority to cyclists and pedestrians
- The Healthy Streets Approach

### **Comments noting concerns or opposition**

We received 155 stakeholder and business comments – 18 of these were in opposition, in particular to the perceived restrictions on private car use and the focus on zero carbon. 45 comments were concerned that the strategy and the timescales were not ambitious enough and a further 92 comments raised a mixture of concerns with the strategy.

We received 511 public comments in opposition (311 of these were in general opposition and the remainder listed more specific objections such as the perceived restrictions on private car use, the focus on cycling and Crossrail 2). We received 527 comments that were concerned that the strategy and the timescales were not ambitious enough, and a further 1,926 comments raising a mixture of concerns with the strategy.

Particular areas of concern across both public and stakeholders / businesses were:

#### **Air quality**

- oppose 'zero-carbon' targets
- concern that timescales for zero emissions (especially buses) are too long

- concern that proposals will displace pollution to other areas

### **Active Travel**

- expects too much modal shift (especially to cycling)
- Active travel not realistic for all journeys or for all people
- Nanny state – it is not appropriate for a transport strategy to be setting health targets

### **Reduction in traffic levels**

- Opposition to restrictions on private car use
- People should be able to choose how they travel
- Driving is often more cost and time effective (especially for orbital journeys)
- It will not be achievable without regulation / 'stick' measures
- Concern about the impact on businesses of measures to manage traffic
- Concern that the strategy fails to consider the potential motorcycles have to address congestion / air quality issues

### **Modal shift**

- Aim won't be achievable in outer London
- Public transport infrastructure can not support more users
- Public transport and cycling / walking infrastructure needs to be more pleasant and reliable before you can ask for mode shift
- Sustainable modes not appropriate for all types of journeys or for all people
- Concern that the strategy does not address lack of transport links in the south and south east of London

### **Improving Accessibility**

- Concern that the strategy does not go far enough to address access for disabled people

### **Vision Zero**

- Concern that the targets are unrealistic

### **Crossrail 2**

- Opposition to the delivery of Crossrail 2 (particularly costs and impact on environment)

## **Level of detail**

- Concerned that the strategy needs more detail on implementation and delivery

## **Comments making suggestions**

We received 152 stakeholder and business and 824 public comments making suggestions for the aims of the strategy. Key suggestions were:

### **Calls for prioritisation**

- There were competing calls for the strategy to prioritise different policies, for example cycling, walking, road safety, congestion and accessibility.

### **Request for more detail**

- Would like to see more detail and interim targets and milestones to deliver mode shift
- Spatial approach / recognising differences between central / inner / outer – needs to be more detailed and explicit

### **More ambitious targets**

- Strategy should be delivered sooner and be more ambitious with particular requests for more ambitious targets / timescales for:
  - Achieving active travel
  - Achieving zero emissions
  - Achieving step free access and wider accessibility improvements
  - Achieving Vision Zero
- Suggestion that an air quality target should be 80 per cent of journeys made being emissions free
- Suburban Metro – would like to see commitment to provide more services / routes not just improving existing ones
- Quicker delivery of Crossrail 2

### **Consistency**

- Will require consistent level of walking and cycling infrastructure across all boroughs

## **TfL response and recommendation**

### **Air quality**

Transport emissions in London have a detrimental impact on the city's streets and the health of those who live and work in or visit London as well as contributing to climate change. Air quality and climate change are such pressing issues with such serious consequences for London, it is right that ambitious aims are set to deal with emissions and improve air quality. The aims set out in the strategy have been carefully considered in the context of London as a growing city and in light of currently available technology. Analysis that supports these aims can be found in the MTS evidence base reports:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

Any proposals to tackle pollution will consider wider impacts to ensure that overall there is a net positive improve in air quality and the health of Londoners.

**TfL recommends no change to the strategy in response to these comments.**

### **Active Travel**

The strategy aims for 80 per cent of all journeys to be made by active, efficient and sustainable modes by 2041 – this will come from more people walking, cycling and using public transport. The strategy has not set a specific mode shift target for each of these modes. It is also acknowledged that active travel may not be possible for all trips, all of the time, and that localised mode shares may vary. The MTS evidence base sets out the analysis that has gone into the development of the 80per cent aim:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

This is an ambitious aim, but an achievable one based on the delivery of the strategy over the next 25 years.

TfL considers that it is appropriate to include an aim relating to health in the MTS. This is consistent with the Mayor's obligations to have regard to the effect the revised strategy would have on the health of persons in Greater London and the achievement of sustainable development in the UK, and include those policies and proposals which are best calculated to promote improvements in health and contribute to the achievement of sustainable development. Promoting active travel will help deliver the other aims of the strategy such as a cleaner city and reduced congestion. It is also one of the easiest ways to build activity into people's daily routines.

**TfL suggests no change to the strategy in response to these comments.**



## **Reduction in traffic levels**

Congestion is one of the biggest issues facing London, with the city's streets among the most congested in Europe. Congestion has a significant impact on quality of life in the city, reducing the reliability of the bus network and delivery and servicing activity. Around 75 per cent of congestion is caused by there being too much traffic on the street network. Reducing traffic levels will be essential to achieving the broader aims of the strategy, to make London a better city in which to live, work and visit. Encouraging people to travel differently and consider alternative options to the car will play a vital role in reducing levels of congestion.

The strategy sets out a number of ways in which environments will be improved for walking, cycling and public transport to encourage more people to travel in an active, efficient and sustainable way. This includes better infrastructure and facilities for those travelling on foot or by cycle, improving the reliability of the bus network, enhancing existing public transport services and providing new infrastructure. The strategy also states that existing and planned road user charging schemes will be kept under review as well as investigating proposals for the next generation of road user charging schemes.

Making public transport more affordable is also key to the strategy and progress has already been made in this area with the introduction of a fares freeze across the TfL network. Walking and cycling are already free or very cheap ways of travelling around London. It is acknowledged that in some less well-connected areas of the city, trips by public transport can take longer and be less reliable. The strategy suggests a number of ways in which services will be improved in these areas, including the development of a suburban metro service, improved bus services and a London-wide strategic cycle network to provide greater active travel choices. .

Congestion can have a negative impact on the efficiency of deliveries and servicing in London. Measures to reduce congestion will benefit businesses by ensuring that deliveries and servicing activity is more reliable. The 'Efficiencies of deliveries and servicing' section of Chapter 3 sets out how the strategy will ensure better management of this activity. Recommended changes to the strategy are outlined under the corresponding section of the consultation report.

Motorcycles are currently exempt from the Congestion Charge as they contribute significantly less to congestion compared with other motorised vehicles. In addition, when the scheme was initially developed, it was difficult to capture the vehicle registration numbers of motorcycles and mopeds using the camera technology proposed to enforce the scheme. However they do contribute to emissions and the reduction of these is the objective of schemes to improve air quality, such as the Ultra Low Emission Zone (ULEZ). It is therefore appropriate to include them in any such scheme. Any future changes to the Congestion Charge would be consulted on and consultations have already been carried out in relation to the ULEZ.

TfL recommends **no change** to the overall aim of reducing traffic in the strategy. Any recommended changes to specific comments raised above can be found in the corresponding section within this report.

## **Modal shift**

The mode share target of 80 per cent of trips to be made by active, efficient and sustainable modes by 2041 is an ambitious, but achievable one. The strategy sets out the ways in which this aim will be supported and delivered. The 80 per cent aim is a London-wide one for overall trips and Chapter 6 provides a more detailed breakdown of what this will mean at a more local level. It is acknowledged that more detail could be provided on how mode shift will be delivered over the course of the strategy and in different parts of the city.

The MTS sets the long-term strategic approach to transport in London for the next 25 years. Introducing interim targets would have the effect of reducing the longevity of the strategy, as short to medium-term trajectories are highly susceptible to change. Interim targets are more appropriate for subsequent delivery plans, the TfL business plan and similar documents, as these can be revised on a more frequent basis, while remaining aligned to the MTS.

Chapter 3 of the strategy sets out plans to improve the environment for walking and cycling, including delivering a programme of Liveable Neighbourhood schemes, transforming Oxford Street, reducing road danger and delivering a London-wide strategic cycle network.

Chapter 4 of the strategy sets out policies and proposals for improving the public transport network, including bus reliability, increased capacity across the Underground network and working with Network Rail and central Government to make further improvements to National Rail services. Chapter 5 also outlines a number of policies and proposals that will deliver additional capacity to the transport network, including the extension of the Bakerloo line and delivering Crossrail 2.

The strategy also acknowledges that for some trips walking, cycling or public transport may not be possible or the most suitable choice, with the expectation that around 20 per cent of trips will be made by car, taxi or private hire vehicles in 2041. The MTS evidence base sets out the analysis that supports this aim.

TfL recommends **a change to Chapter 6** to add further detail on how mode shift will be achieved over the lifetime of the strategy and in different parts of London.

TfL recommends **a change** to Figure 2 (Mode share 2015, and 2041) and other references to current mode share, to clarify that 2015 mode share for walking, cycling & public transport is 63 per cent.

The strategy includes a number of proposals that will directly benefit transport services in south and south east London, this includes lobbying Government for the devolution of local stopping rail services to the Mayor and TfL to create a suburban metro service, extending the Bakerloo line to Lewisham, extending the Elizabeth line

from Abbey Wood to Bexley and North Kent delivering Crossrail 2 and improving orbital travel through the creation of mini-radial hubs.

TfL recommends **no change** to the strategy in response to these comments.

### **Improving accessibility**

One of the aims of the strategy is 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 to the full network

Policy 12 and Proposals 51-52 cover accessibility in more detail and it is in the section of the consultation report that more detailed responses to accessibility issues can be found.

TfL recommends **no change** to the aim.

TfL recommends changes to the narrative and Proposals 51-52 as outlined in the relevant section of this report.

### **Vision Zero**

Vision Zero is based on the belief that deaths and serious injuries as a result of collisions on the roads are neither inevitable nor acceptable. These tragic events are the result of a number of factors coming together, many of which are preventable.

This is why the strategy has set an aim to eliminate death and serious injury from London's streets. The journey towards zero is set out with the short term and mid term casualty reduction milestones for 2022 and 2030. All milestones were set with reference to past trends in casualty reductions and the anticipated results of TfL's wide ranging programme to reduce road danger, and therefore they are ambitious but achievable.

TfL recommends **no change** to the strategy in response to these comments.

### **Crossrail 2**

Crossrail 2 has the potential to deliver 200,000 new homes and 200,000 new jobs across London. The benefits of the scheme will be felt not just in the capital but across the country. The delivery of Crossrail 2 is essential to achieving the aim of more people travelling by active, efficient and sustainable modes in London. Elements of the scheme have already been consulted upon, and any further development of the scheme will also be subject to consultation. Relevant environmental impact assessments will be made to minimise any negative impacts on the environment.

TfL recommends **no change** to the strategy in response to these comments.

## **Level of detail / Requests for more detail**

The MTS is a 25 year strategy that sets out the vision and policies and proposals for improving transport in London. It is not possible, nor is it suitable, to provide detail on individual schemes within the strategy. Chapter 6 of the strategy sets out how the strategy will be funded and delivered, including an implementation plan for key schemes. Further detail on individual schemes and their delivery will be published in the TfL Business Plan.

TfL recommends **no change** to the strategy in response to these comments.

The strategy sets the ambitious aim of 80 per cent of all trips to be made by active, efficient and sustainable modes by 2041. Individual mode share targets have not been set for this strategy as walking, cycling and public transport all contribute to achieving the 80 per cent active, efficient and sustainable mode share aim. The MTS is a long-term strategy deliverable over 25 years – TfL publishes its business plan annually, covering a five-year period, which is a more suitable document for interim targets. It is, however, accepted that some additional clarity would be useful on the 80 per cent aim and what this might mean for walking and cycling and public transport, which should be covered elsewhere in the strategy.

TfL recommends **a change to Chapter 6, part C, to clarify** the breakdown, broadly, between different modes as part of the 80 per cent active, efficient and sustainable mode share target.

Chapter 2 of the strategy includes a section entitled 'Transforming the transport system – a spatial approach'. This outlines the vision for central, inner and outer London. Figure 57 in chapter 6 provides expected mode share breakdowns for trips within and between these areas. Suggestions for additional detail at a spatial level have been accepted and a recommended change is proposed.

TfL recommends **a change to Chapter 6 to add** further detail on how mode shift will be achieved over the lifetime of the strategy and in different parts of London.

## **Calls for prioritisation**

The central aim of the strategy is for 80 per cent of trips in London to be made by active, efficient and sustainable modes by 2041. This means encouraging more people to walk, cycle and use public transport. To achieve this aim the strategy will need to be delivered as a whole as each policy and proposal contributes towards this and the other aims of the strategy. Chapter 3 of the strategy outlines the policies and proposals that will be delivered to encourage more people to walk and cycle, reduce road danger and make more efficient use of the street network. Improving accessibility of the transport network is set out in Chapter 4 but is also addressed in Chapter 3 in relation to walking and cycling.

TfL recommends **no change** to the strategy in relation to the prioritisation of policies and proposals. Any recommended changes specifically relating to cycling, walking,

road safety, congestion and accessibility can be found in the corresponding sections of this consultation report.

### **More ambitious targets**

The timescales for delivery of the aims across the MTS have been based on extensive modelling and analysis and also assessing the feasible timescales for delivery. It is felt that these aims are ambitious in the context of London's growing population. Across a number of areas, including Vision Zero and achieving zero emissions there are interim milestones that have been set. For these two areas a number of minor revisions are recommended to expand the scope of Vision Zero and to bring forward some of the timescales relating to emissions.

TfL recommends **a change** to the strategy to expand the scope of Vision Zero to apply to the entire transport system and to adjust timescales around emissions for taxis and private hire vehicles and buses. Changes to specific areas of the strategy in relation to Vision Zero, zero emissions and accessibility can also be found in the corresponding sections of this consultation report.

The plans for a suburban metro service would see control over local stopping services in south London passed to the Mayor and TfL. These plans would include significant enhancements to current services, including increased frequencies, particularly at off-peak times and weekends. This would bring these services in line with London Overground. In addition to the suburban metro there are proposals for two new services in south London: Crossrail 2 and the extension of the Bakerloo line.

TfL recommends **no change** to the strategy in response to these comments.

### **Consistency**

The strategy acknowledges the need to work in close collaboration with London's boroughs when developing new schemes and TfL will play a strategic role in co-ordinating activity in relation to a number of proposals in the strategy. Revised Local Implementation Plan (LIP) guidance for boroughs will be an important part of this and has been developed in conjunction with the strategy. Different approaches will be required in different parts of the city, but all will be underpinned by the Healthy Streets Approach which is set out in the strategy and LIP guidance.

TfL recommends **no change** to the strategy in response to these comments.

## **6.3 Healthy Streets and healthy people**

### **6.3.1 Active, inclusive and safe travel - Improving walking and cycling environments (Policy 1)**

#### **Comments in support**

We received 214 supportive comments from stakeholders and businesses and 233 supportive comments from the public. Particular areas of support were:

- Encouraging walking and cycling
- Aim for 20 minutes of active travel per day
- More investment in promoting active travel / sustainable transport
- More priority to be given to pedestrians and cyclists
- Active travel targets and policies to improve public health

#### **Comments noting concerns or opposition**

We received 94 comments of concern from stakeholders and businesses and 716 comments of concern from the public. Particular areas of concern were:

#### **Targets**

- The active travel aim of 20 minutes per day is not inclusive – a lack of policies to support less able people; walking and cycling not being practical for everyone and unfair to those who have to drive or are more restricted in their choices of how to get around
- Walking and cycling targets are not ambitious enough

#### **Managing conflicting needs**

- Emphasis on cyclists in the proposals
- Conflict between development of cycle infrastructure, pedestrian infrastructure and bus priority
- Insufficient consideration has been given for how different age groups use streets (children, teenagers and elderly people)
- Healthy Streets infrastructure will impede the flow of emergency vehicles

## **Other**

- The weather in relation to walking/cycling alternatives (deterring people from active travel)

## **Comments making suggestions**

We received 153 comments of suggestion from stakeholders and businesses and 150 comments of suggestion from the public. Key suggestions included:

### **Applying the Healthy Streets Approach**

- The Healthy Streets Approach should not be applied through a blanket approach and that local interpretations should be considered
- There should be a strategy to detail how all road users can be accommodated with limited road and pavement space
- There should be a London-wide road user hierarchy
- The strategy should provide timescales / targets for walking / cycling measures
- A budget for the promotion of walking and cycling should be set
- Suggest learning from international case studies

### **Healthy Streets Indicators**

- Pavements and footpaths should be cleaned more regularly
- Street furniture / clutter should be reduced to improve visibility and accessibility of streets
- There should be greater separation of walkers and cyclists (less shared space)
- There should be better street lighting

### **Active Travel**

- A greater emphasis should be placed on the mental health benefits of active travel
- Evidence should be included in the final strategy of engagement with Public Health England to ensure active travel objectives tie up with public health outcomes
- Target should be treated as advisory and not mandatory

## **TfL response and recommendation**

### **Targets**

The active travel aim in the draft MTS was developed by TfL from the guidance of the Chief Medical Officer

([https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/213740/dh\\_128145.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/213740/dh_128145.pdf)) which says everybody needs to be active every day in periods of ten minutes or more to reach a minimum of 150 minutes of activity per week for adults, or 60 minutes of activity per day for children aged over 5 years. An individual's physical or mental capabilities should be considered when interpreting these guidelines. The proportion of Londoners who are physiologically unable to be active on a daily basis is very small and these individuals will need to seek advice from their GP as to how they can optimise their health in this context. The strategy acknowledges that for some trips walking, cycling or public transport may not be possible or the most suitable choice, with the expectation that around 20 per cent of trips will be made by car, taxi or private hire vehicles in 2041. The MTS evidence base sets out the analysis that supports this aim.

The strategy aims for 80 per cent of all journeys to be made by active and sustainable modes by 2041 – this will come from more people walking, cycling and taking public transport. The MTS evidence base sets out the analysis that has gone into the development of the 80 per cent aim:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

This is an ambitious aim, but an achievable one based on the delivery of the strategy over the next 25 years.

**TfL recommends no change to the strategy in response to these comments.**

Proposals for walking and cycling contribute to the aim of 80 per cent of trips to be made by active, efficient and sustainable modes by 2041. This is seen as an ambitious target in light of the projected growth in London's population and subsequent growth in the number of trips over the life-time of the strategy. Evidence relating to how this aim was reached can be found in the associated evidence reports available on the TfL website:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

**TfL recommends no change to the strategy in response to these comments.**

### **Applying the Healthy Streets Approach**

The Healthy Streets Approach is designed to be applied at a local level as well as across the transport network. It is for boroughs to use the approach when designing schemes in their area, taking into consideration the needs for their borough or



neighbourhood. TfL has recently published further guidance on applying the Healthy Streets Approach, including a tool for scheme designers. TfL will provide support to boroughs to ensure officers and councillors are familiar with the approach and how it can be applied in their local area. In addition to this revised LIP guidance has been developed alongside the strategy, this is underpinned by the Healthy Streets Approach and will provide additional guidance on taking the strategy forward and implementing Healthy Streets at a local level.

**TfL recommends no change to the strategy in response to these comments.**

The strategy already provides a number of delivery timescales for walking and cycling schemes, including the delivery of the first phase of the Oxford Street transformation in winter 2018. The strategy also includes an implementation table in Chapter 6 which gives further detail on the delivery of streets schemes. As a high level strategy, the MTS is not the correct document for discussing detailed scheme delivery or funding and further details on new schemes will be provided as they are developed.

**TfL recommends no change to the strategy in response to these comments.**

In many areas, London is a leading world city in transport planning best practice. TfL continues to take note of international best practice across all areas of transport through its participation in international benchmarking projects and by playing an active role in groups such as the Union Internationale des Transport Publics (UITP) and Urban Transport Group (UTG) and in transport planning and policy development more generally.

**TfL recommends no change to the strategy in response to these comments.**

### **Managing conflicting needs and Healthy Streets Indicators**

The active, inclusive and safe travel section of the strategy places equal emphasis on the need to improve conditions for both walking and cycling. The strategy reflects this through the proposals specifically aimed at encouraging more walking and cycling, including the Liveable Neighbourhoods programme, the transformation of Oxford Street and the development of a London-wide strategic cycle network.

**TfL recommends no change to the strategy in response to these comments.**

It is acknowledged that there are many competing demands on London's street network, particularly between the needs of those travelling on foot, bike or bus and also movement of essential services such as vans, lorries and cars. Any approach to allocating street space needs to be considered carefully and will vary between different parts of the city. The Healthy Streets Approach provides guidance that can be applied at a local level. The strategy has a central aim of 80 per cent of all trips to be made by active, efficient and sustainable modes by 2041; reducing overall car use. The concerns and suggestions that have been raised in response to the consultation have been acknowledged.

TfL recommends **a change** to the narrative in the 'Improving London's Streets' section of the strategy, **to clarify** the approach to the way in which street space is allocated.

TfL recommends **no change to the policy** in relation to a London-wide road user hierarchy, as it is felt that this is sufficiently addressed through the aim of an 80per cent active, efficient and sustainable mode share.

The Healthy Streets Approach is based on 10 Healthy Street Indicators. These should be considered in the development of all new schemes in London and can be used to review streets. 'Pedestrians from all walks of life' is one of two top-level indicators which seek to ensure streets are designed for all users, including older and younger people. The indicator 'People feel relaxed' ensures streets are clean, well maintained and clear from unnecessary street furniture and clutter, in particular to make it easier for those travelling in groups, with bags and disabled people to get around. The 'People feel safe' indicator also guides principles on ensuring the whole community feels comfortable and safe on the streets at all times, including improving personal safety, which can be enhanced by better street lighting. More information on the indicators is set out in the Guide to Healthy Streets Indicators.

TfL recommends **no change** to the strategy in response to these comments.

### **Active travel**

The section of Chapter 3 entitled 'Focus On: Health Benefits of Active Travel' highlights a number of the benefits of walking and cycling to both physical and mental health, including the reduced risk of depression and social isolation.

TfL recommends **no change** to Policy 1.

TfL recommends **a change** to the wording in Proposal 1 **to add** wording on reducing severance caused by roads and rails to limit social isolation.

Public Health England (PHE) Guidance 'Everybody active, every day' (<https://www.gov.uk/government/publications/everybody-active-every-day-a-framework-to-embed-physical-activity-into-daily-life>) shows that building activity into the daily routine through walking or cycling for travel purposes is the most effective means of achieving the recommended physical activity level for the majority of the population. In London the majority of people walk each week and report wishing to walk or cycle more if the conditions were amenable to do so. 'Active 10' is the PHE campaign to increase the level of activity amongst adults (<https://www.nhs.uk/oneyou/active10/home#Jh4CBTxclQBwyvwY.97>) and promotes walking in 10 minute periods. 'Ten minute shake ups' is the equivalent PHE campaign for children (<https://www.nhs.uk/10-minute-shake-up/shake-ups#JQmzXThex4tTTfwr.97>).

TfL recommends **no change** to the strategy in response to these comments.

## **6.3.2 Active, inclusive and safe travel – Getting all Londoners Walking and Cycling (Street environments that encourage walking & cycling – proposals 1-4)**

### **Comments in support**

We received 294 supportive comments from stakeholders and businesses and 1165 supportive comments from the public. Particular areas of support were:

#### **Funding**

- The Liveable Neighbourhoods programme and associated funding
- More investment in promoting active travel / sustainability projects

#### **Cycling**

- The ambition of 70 per cent of people living within 400m of a safe cycle route / the number of cycle routes to be built
- Constructing a comprehensive cycling network / cycling infrastructure design to an agreed standard (London-wide)
- Segregated cycle lanes
- More cycle parking and secure cycle parking
- More investment in cycling infrastructure

#### **Walking**

- Protecting, improving and promoting walking networks (e.g. the Walk London network)
- Pedestrianisation schemes and streets being designed for pedestrians first (Oxford Street / Parliament Square/ wider footpaths / better crossings and street lighting)

#### **Both Walking and Cycling**

- The creation of a high-quality public realm that encourages walking and cycling
- More cycle and pedestrian river crossings

### **Comments noting concerns or opposition**

We received 161 comments of concern from stakeholders and businesses and 603 comments of concern from the public. Particular areas of concern were:

## **Displacement of traffic**

- The impact of re-routed traffic due to Oxford Street transformation / pedestrianisation
- Loss of vehicle access as a result of cycle infrastructure schemes with resulting increases in congestion and pollution (Cycle Superhighways / ability for existing road widths to accommodate cycle schemes)

## **Concerns about extent and quality of walking and cycling infrastructure**

- The London-wide cycle network doesn't adequately cover the whole city and that the target of 70 per cent living within 400m is not ambitious enough
- The quality of existing cycle infrastructure (routes ending abruptly / traffic lights on Superhighways)
- Oppose cycle lanes/ segregated cycle lanes
- Pedestrian crossings can be poorly designed / impractical / unsafe
- New cycle infrastructure needs to be delivered faster
- The value for money of investing in cycling infrastructure (lanes empty outside peak hours)

## **Shared space and accessibility**

- The mix of share space between pedestrians and cyclists

## **Comments making suggestions**

We received 237 comments of suggestion from stakeholders and businesses and 416 comments of suggestion from the public. Key suggestions included:

### **Walking and cycling infrastructure**

- The MTS should give further emphasis to cycle parking improvements (adding cycle racks to buses, trains and the underground / secure bicycle parking next to car club locations / boroughs provided with adequate funding to provide cycle parking)
- Greater emphasis is given to requirement for cycle infrastructure in outer London, with a particular focus on orbital routes
- Strategy should include reference to improving canal tow paths and recognition of their role as active travel infrastructure
- Enforcement of cyclist use of segregated lanes

## **Shared space and accessibility**

- Improving walking and cycling environments for disabled people (improving DDA compliance of footways / ensuring safety of disabled people / innovative solutions for blind and partially sighted)
- Consideration should be given to impacts of construction / street works on pedestrians and cyclists and disabled / older people.
- Improved management of share spaces
- Needs to be more segregation on London's streets
- Improving safety in pedestrianised areas

## **TfL response and recommendation**

### **Displacement of traffic**

In developing plans to transform Oxford Street extensive analysis, modelling and option development has been undertaken to assess the impact of re-routed traffic on neighbouring areas. The scheme will aim to mitigate against the impacts of re-routed traffic on neighbouring areas.

TfL recommends **no change** to the strategy in response to these comments.

Cycling is an efficient use of space and encouraging more people to cycle is an integral part of maintaining the reliability of London's roads. However, it is acknowledged that the design of new cycling infrastructure must be balanced with the needs of other road users, particularly the bus network, pedestrians and disabled people.

TfL recommends **a change** to the narrative in the 'Improving London's Streets' section of the strategy, **to clarify** the approach to the way in which appropriate use of street space is considered.

### **Walking & cycling infrastructure**

The London-wide cycling network proposed in the MTS will provide a network of high-quality, safe routes across Greater London, making it easier and more attractive to get around by cycle. This will provide routes able to cater for substantial levels of cycling for both shorter and longer trips. The strategic network will be designed to link existing and new routes and area-wide interventions developed at a local level, including in outer London. This will provide widespread coverage for the entire city. The ambition of 70 per cent of people living within 400m of the strategic cycle network is ambitious, and access to this network will ultimately be wider when feeder links from neighbourhood routes are taken into consideration.

TfL recommends **a change to Proposal 3 and Figure 4** in the final strategy **to clarify** the nature and extent of the London-wide cycle network.

TfL recommends **no change** to the ambition for 70 per cent of Londoners living within 400m of the London-wide cycle network.

The proposed London-wide strategic cycle network will provide a high quality network of safe routes across the city, making it easier and more attractive to get around by cycle. All new cycling infrastructure will also be subject to the Healthy Streets Check and use or follow London Cycle Design Standards.

TfL recommends **no change** to the strategy in response to these comments.

London's canal and river tow paths are integral parts of the city's walking and cycling network and TfL works closely with the Canal & Rivers Trust on a number of walking and cycling schemes and initiatives.

TfL recommends **no change** to the strategy in response to these comments.

Lack of secure cycle parking is an identified deterrent to more people cycling. The suggestions for more emphasis to be placed on cycle parking in the final strategy have been accepted and it is proposed that they are reflected with a change to the strategy. .

TfL recommends **a change to Proposal 1 (c) to add wording on 'secure' cycle parking**.

The central aim of the strategy is for 80 per cent of all trips in London to be undertaken by active, efficient and sustainable modes by 2041. Achieving this will help address a number of the biggest challenges facing the city such as congestion, poor air quality and health issues related to inactivity. Improving cycling infrastructure will play a significant role in making it easier and more attractive to get around by cycle.

Cycle-specific infrastructure such as cycle lanes and cycle tracks, which separates cyclists from other road users, can give greater physical protection for cyclists and contribute to their feeling of safety. Many people are put-off cycling because they perceive it as being dangerous, so it is important that infrastructure makes them feel safer and more comfortable. The approach to cycling infrastructure will differ across the city and will depend on local conditions, therefore segregated cycle lanes are not advocated as a blanket approach to cycling infrastructure in the strategy.

Mandating the use of cycle lines by those travelling by cycle would fall outside the remit of the Mayor and TfL and would be an issue for the Department for Transport. The strategy would not support such an approach for a number of pragmatic reasons, such as people cycling needing to use the main carriageway to get in and out of cycle tracks, particularly where there are two-way tracks on one side of the road. As such connections are not always straightforward it would be impractical to ban those travelling by cycle from the rest of the road. It is also generally understood by road users that they might encounter people cycling on any road, which is helpful for promoting road danger reduction. The strategy should not erode that understanding and create an expectation that cyclists are banned in certain places.

TfL recommend **no change** to the strategy in response to these comments.

The proposal for the delivery of the London-wide strategic cycle network, and the timescale for delivery, is deemed to be appropriate given the need to carefully plan and engage on proposals, to design new infrastructure to high standards, and to build new schemes in a way meets Healthy Streets objectives for people walking, cycling and using public transport during the construction period. It is important to recognise that key infrastructure will be delivered across the life-time of the strategy. A number of new schemes that will form part of the London-wide strategic cycle network have already been consulted on in 2017, including Cycle Superhighways 4 and 9.

TfL recommends **no change** to the strategy in response to these comments.

Investing in cycling infrastructure, to encourage more people to walk and cycle, can bring a number of wide ranging benefits to London.. Cycling has a number of recognised health benefits, both physical and mental. Encouraging more people to cycle will increase levels of physical activity, which is currently one of the biggest threats to the health of Londoners. Cycling is a zero emission form of transport so can help improve the city's poor air quality. It is also a more efficient use of street space.

Cycling schemes are also relative low cost when compared to larger infrastructure schemes and often produce high benefit / cost ratios providing good value for money against the initial investment.

TfL recommends **no change** to the strategy in response to these comments.

One of the 10 Healthy Streets Indicators is 'Easy to cross' which focuses on making streets easier to cross which is important in encouraging more walking and connect communities. This acknowledges that people prefer direct routes and being able to cross streets at convenient points. In addition to this the indicators 'Pedestrians from all walks of life', 'People choose to walk, cycle and use public transport' and 'People feel safe' also seek to improve the experience for people travelling on foot, including better pedestrian crossing facilities. The Healthy Streets Approach, combined with relevant design guidance and future strategies to improve walking, will help to improve the design, practicality and safety of pedestrian crossings.

TfL recommends **no change** to the strategy in response to these comments.

### **Shared space and accessibility**

TfL's approach to the use of shared space is that it needs to be considered as a solution to a problem rather than being an objective in itself, and that there is no standard 'one size fits all' approach. Any scheme also needs to be considered in line with our wider principles for designing pedestrian environments, which includes the inclusivity and legibility of shared areas and how priority is defined. As a long-term strategy document the MTS is not the most suitable place for a detailed discussion on this topic.

TfL recommends **no change** to the strategy in response to these comments.

Proposal 1 (d) includes details on improving accessibility of streets for older and disabled Londoners. Any improvements made on London's streets for pedestrians and cyclists will consider the needs of all Londoners and approved design guidance. New walking and cycling infrastructure will follow the Healthy Streets Approach. Two of the key Healthy Streets Indicators are 'People choose to walk, cycle and use public transport' and 'Pedestrians from all walks of life' – for schemes to address these two indicators they will need to be accessible and give consideration to the needs of all users. TfL has recently published more guidance for planners across London on how to use the Healthy Streets Approach when planning the city's streets and spaces.

TfL recommends **no change** to the strategy in response to these comments.

TfL has already introduced measures at street works on the TLRN to improve conditions for people cycling, keeping some sections of road open for people cycling whilst staying closed to other traffic. The suggestion on further mitigating the impact of street works is reflected.

TfL recommends **a change to Proposal 1 (d) to add** reference to mitigating the impact of street works.



### **6.3.3 Active, inclusive and safe travel – Getting all Londoners Walking and Cycling (Making it easier to get around in foot or by bike – proposals 5-6)**

#### **Comments in support**

We received 56 supportive comments from stakeholders and businesses and 6 supportive comments from the public. Particular areas of support were:

- Improving wayfinding for walking and cycling
- Mapping and journey planning tools prioritising pedestrian, cycle and bus routes across London
- Increasing the use of the Cycle Hire scheme, as well as future models of cycle hire

#### **Comments noting concerns or opposition**

We received 3 comments of concern from stakeholders and businesses and 50 comments of concern from the public.

No significant concerns were raised with regards to either of these proposals.

#### **Comments making suggestions**

We received 83 comments of suggestion from stakeholders and businesses and 65 comments of suggestion from the public. Key suggestions included:

##### **Technology**

- Utilising technology to promote walking and cycling routes
- Expanding Cycle Hire network interoperability with Oyster cards

##### **Dockless and new forms of cycle hire**

- Final strategy needs to reference effective management of dockless cycle hire
- Final strategy should reference how dockless cycle hire can provide a solution in boroughs out of scope for TfL Cycle Hire
- Strategy should include a plan and funding for the use of e-bikes

#### **TfL response and recommendation**

##### **Technology**

Chapter 6 and Policy 21 sets out the approach to new technology over the course of the strategy. This will ensure London's transport system evolves with new and developing technology and that new technology develops in a way that compliments

the aims and vision of the strategy. There are also a number of existing apps and journey planning tools available that allow people to plan walking and cycling routes and TfL will work with these developers to improve these wherever possible.

TfL recommends **no change** to the strategy in response to these comments.

## Cycle Hire

Incorporating the Cycle Hire scheme into the Oyster payment network has been raised and investigated previously. The current scheme is unfortunately not compatible with Oyster card technology. TfL is currently investigating the next generation of payment systems, therefore upgrading the scheme to Oyster now may mean the technology is quickly superseded by a newer payment system.

TfL recommends **no change** to the strategy in response to these comments.

## Dockless and new forms of cycle hire

Dockless cycle hire schemes can potentially provide additional travel options in areas of the city not currently covered by TfL's Cycle Hire scheme. The suggestions around dockless cycle hire – the need for good management of schemes, plus the solutions they can provide – have been acknowledged.

TfL recommends **a change** to the narrative text around **Proposal 5** to make reference to the need for appropriate management.

TfL recommends **a change to Proposal 6** to reflect the potential of new models of cycle hire.

Proposal 6 references future models of cycle hire. TfL will work with boroughs and operators to ensure that any such schemes provide a suitable addition to the transport system and work for all Londoners.

TfL recommends **a change to Proposal 6** to clarify the position on future models of cycle hire. TfL recommends **a change** to the narrative text **to clarify** how the impact of new technology is managed in relation to dockless cycle hire schemes.

E-bikes have been considered as part of cycle hire schemes before; however there was found to be no business case for a successful scheme. As a high-level strategic document, the MTS would not be the place to detail plans or funding for e-bikes and in some instances it may be a decision for consideration at a local, borough level.

TfL recommends **no change** to the strategy in response to these comments.

However, further research by TfL has deemed that an e-bike scheme in London would not be financially viable at this time and therefore it is recommended that reference to this type of scheme is **removed** from the final strategy.

### **6.3.4 Active, inclusive and safe travel – Getting all Londoners Walking and Cycling (Promoting walking and cycling for all Londoners – proposals 7-8)**

#### **Comments in support**

We received 51 supportive comments from stakeholders and businesses and 110 supportive comments from the public. Particular areas of support were:

- Working with schools, employers and community and user groups to promote walking and cycling
- The suggestion to promote one-off, regular and trial closures of streets to some or all motorised traffic so that Londoners can see their streets differently

#### **Comments noting concerns or opposition**

We received 7 comments of concern from stakeholders and businesses and 35 comments of concern from the public. Particular areas of concern were:

- Lack of consideration for the psychology behind mode choice / behaviour change
- Policies and proposals aren't ambitious enough and do not acknowledge the extent of the behavioural shift required to reduce car dependency.
- Impact of trial street closures on delivery and servicing activity

#### **Comments making suggestions**

We received 67 comments of suggestion from stakeholders and businesses and 142 comments of suggestion from the public. Key suggestions included:

##### **Education**

- More cycle training / education on road safety including encouraging more BAME cyclists

##### **Behavioural change**

- A strategy to encourage mode shift to active modes for Londoners who are dependent on motor cars
- More proposals to reduce car use for school runs/improve safety at schools
- Greater promotion of the active travel message
- Proposals should be more radical and promote a society where fewer people actually own cars

## Street Closures

- Greater acknowledgement that boroughs need to assess suitability of street closures on a case by case basis
- Introducing car free days across London

## TfL response and recommendation

### Cultural shift and education

TfL has undertaken extensive research and analysis on mode shift and propensity for people to switch modes, as set out in the supporting MTS evidence base:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

Working with schools, communities, boroughs and other organisations will be key to encouraging people to think differently about how they travel around the city. The strategy also sets out how the Healthy Streets Approach will be applied across the transport network to improve environments for active, efficient and sustainable travel. Better provision and improved environments will play a major role in getting more people walking, cycling and using public transport.

TfL recommends **no change** to the strategy in response to these comments.

### Street closures

In many instances temporary or trial street closures for traffic will be decided at a local level. Proposal 7 in the strategy provides the policy basis for undertaking more temporary street closures for traffic in the future, the nature of which will be developed going forward. Any street closures will be undertaken with local engagement and provision for essential servicing and deliveries.

TfL recommends **no change** to the strategy in response to these comments.

## **6.3.5 Active, inclusive and safe travel - Vision Zero to tackle road danger (Policy 2)**

### **Comments in support**

We received 76 supportive comments from stakeholders and businesses and 159 supportive comments from the public. Particular areas of support were:

- General overall support for making improvements for road safety
- The aims and ambitions of Vision Zero
- Improving bus safety
- Partnership working to meet road safety aims and associated funding
- Making walking and cycling safer

### **Comments noting concerns or opposition**

We received 90 comments of concern from stakeholders and businesses and 289 comments of concern from the public. Particular areas of concern were:

#### **Vision zero targets**

- Vision Zero is unrealistic (the aim of no KSIs by 2041 is not achievable)
- 2041 road safety targets are too long term

#### **Reducing slight injuries**

- Vision Zero falls short by only focussing on fatal or serious injuries when slight injuries are rising and have more impact on people's choice of travel

#### **New technology and bus safety**

- Vision Zero for buses will not be achievable unless collision prevention technology is introduced due to age and profile of existing fleets and layout of roads
- Bus maintenance and driver welfare presenting accident / health and safety risks

#### **Behaviour, education and enforcement**

- Cyclist behaviour (danger to pedestrians from pavement cycling / shared space areas / causing accidents)
- Current dangers of cycling in London
- Strategy does not reference ensuring that the police have sufficient resources to police roads

## **Comments making suggestions**

We received 85 comments of suggestion from stakeholders and businesses and 403 comments of suggestion from the public. Key suggestions included:

### **Behaviour, education and enforcement**

- Better education around road safety and greater awareness of the Highway Code – including better education for drivers (providing information that is proven to improve safety)
- Better training and education for cyclists (including tests / insurance / licenses / more cycle training)
- Introducing measures to ensure cyclists give way to pedestrians
- Stricter enforcement of traffic offences
- More commitment to pedestrian safety

### **Vision zero targets**

- Reducing the timescales for KSI targets (bringing them forward from 2041)

### **New technology**

- Using alternative methods of managing speed (harnessing new technology)

### **Reducing slight injuries**

- More reference should be given to reducing slight injuries

## **TfL response and recommendation**

### **Vision Zero targets and reducing slight injuries**

Vision Zero is based on the belief that deaths and serious injuries as a result of collisions on the roads are neither inevitable nor acceptable. These tragic events are the result of a number of factors coming together of which many are preventable.

This is why the strategy has set an aim to eliminate death and serious injury from London's streets. The journey towards zero is set out with the short-term and mid-term casualty reduction milestones for 2022 and 2030. All the milestones were set with reference to past trends in casualty reductions and the anticipated results of TfL's wide ranging programme to reduce road danger, and therefore they are ambitious but achievable. The MTS evidence base provides further detail on this:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

Vision Zero focuses on eliminating death and serious injury across London's road network. This will be achieved by reducing road danger, thereby reducing slight

injuries and improving perceptions of safety. Addressing the sources of road danger will protect those who are most vulnerable on London's streets, especially people walking, cycling, or motorcycling.

TfL recommends **no change** to the strategy in response to these comments.

### **Buses and technology**

New technology will help achieve Vision Zero, for example, TfL is rolling out speed limiting technology on London Buses. As technology can change rapidly it is not appropriate for the strategy to commit to specific technological solutions that may rapidly be superseded. However concerns and suggestions around the role of technology have been acknowledged.

TfL recommends **a change to Proposal 9 (a and c) to add wording on new technology in relation to vehicle safety and lowering vehicle speeds.**

The strategy clearly sets out across Policy 2, in Proposal 9 and in accompanying text, the ambition to improve safety across the bus network. This includes the aim of no-one to be killed in or by a London bus by 2030 and the development of a Bus Safety Standard which will feature design and training measures to protect passengers and other road users. The Safe Vehicles and Safe People principles of Vision Zero further strengthen this.

TfL recommends **no change** to the strategy in response to these comments.

### **Education and training**

Proposal 9 (d) in the strategy sets out plans for the delivery of a programme of training, education and enforcement activity to improve the safety of vulnerable road users. This will build on activity that TfL has run in the past to raise awareness of good road user behaviour, including working with schools, businesses and freight operators on safety education and training. TfL will continue to work closely with the police, including funding the Metropolitan Police's Cycle Safety Team, to maintain enforcement against dangerous behaviour from all road users.

More detail on future programmes will be published separately from the MTS.

TfL recommends **no change** to the strategy in response to these comments.

### **Walking and cycling**

Policy 2 and Proposal 9 (a-d) set out the Mayor's plans for improving safety for vulnerable road users, especially those travelling on foot and by bike, by adopting a Vision Zero approach to road danger reduction. More detail on Vision Zero will be published separately from the MTS. In addition to the specific sections of the strategy that address road danger reduction, Policy 1 and the accompanying proposals on improving walking and cycling environments will also help improve safety for walking and cycling. This includes the ambition of 70 per cent of Londoners living within 400m of a strategic cycle network made up of safe, high-

quality routes, as well as improvements to the Walk London network and the transformation of Oxford Street.

TfL recommends **no change** to the strategy in response to these comments.

### **Enforcement**

Proposal 9 (d) sets out plans to deliver a programme of training, education and enforcement activity to improve safety. TfL will work with and support London's police forces on enforcement activity. This will be coupled with better design of streets to encourage slower speeds.

TfL recommends **no change** to the strategy in response to these comments.



### **6.3.6 Active, inclusive and safe travel - Vision Zero to tackle road danger (proposals 9-11)**

#### **Comments in support**

We received 185 supportive comments from stakeholders and businesses and 318 supportive comments from the public. There was general support for improvements in road safety with particular support for:

- The Direct Vision Standard
- Educating bus drivers on road safety
- The proposed measures to reduce road danger
- Reducing traffic as means to increase road safety
- Imposing / reducing and enforcing speeding limits and traffic offences – particularly 20mph zones
- Enforcement activities to improve safety
- Proposed measures to improve motorcycle safety

#### **Comments noting concerns or opposition**

We received 84 comments of concern from stakeholders and businesses and 566 comments of concern from the public. Particular areas of concern were:

##### **DVS and technology**

- Cost of upgrading vehicle fleets for freight operators in relation to Direct Vision Standard
- Targets for no serious injuries will not be achievable without significant and currently unknown technological advances

##### **Motorcycles**

- Safety issues from motorcycles in bus lanes
- The benefits of motorcycling are not recognised in the strategy enough

##### **20 mph zones**

- Opposition to applying 20mph limits

##### **Policing of cyclists**

- Cyclist behaviour with suggestions for cyclist registration scheme / improved policing of cyclist behaviour

## **Comments making suggestions**

We received 195 comments of suggestion from stakeholders and businesses and 610 comments of suggestion from the public. Key suggestions included:

### **20 mph zones**

- The strategy should be more robust about lowering speed limits – including:
  - Enforcing 20mph speed limits on residential streets
  - More areas should become 20mph – including TLRN

### **Motorcycles**

- Looking more into motorcycling safety in bus lanes
- Consideration should be given to the Motorcycle Action Group (MAG) campaign response
- Strategy should encourage motorcycle use

### **Collision Investigation**

- Greater transparency in collision investigation – including more analysis of accident hot spots and KSIs by accident and vehicle type

### **Policing of cyclists**

- Improved policing of cyclist behaviour

## **TfL response and recommendation**

### **Direct Vision Standard**

It is understood that ensuring the least dangerous vehicles are on the road can mean increased costs to businesses. In developing DVS, TfL has carried out a full Cost and Business Impact Assessment. A careful balance between meeting the goals of Vision Zero, ensuring ‘good growth’ in London and ensuring sustainable operations for industry is required.

The scheme proposal does not require HGVs with poor direct vision to adopt practices or equipment that are not already approved and commonplace in the industry. TfL used an estimated maximum cost of around £2,000 per vehicle to fit equipment to comply. In practice, many operators will already be at, or near, this level and the cost to them will be considerably less. The costs of an operator’s HGV colliding with a vulnerable road user are likely to be far higher in terms of disruption to the business, including police investigations and Coroners Court attendance, loss of use of the vehicle and driver, and potential reputational damage. Most importantly of all is the very real pain and anguish for everyone affected by a collision that might have been avoided: the victim, the driver, their families, friends and colleagues.

TfL recommends **no change** to the strategy in response to these comments.

### **Vision Zero targets**

All the Vision Zero milestones were set with reference to past trends in casualty reductions and the anticipated results of TfL's wide ranging programme to reduce road danger, and therefore they are ambitious but achievable.

As technology can change rapidly it is not appropriate for the strategy to commit to specific technological solutions that may rapidly become superseded. However, concerns and suggestions around the role of technology have been acknowledged.

TfL recommends **a change to Proposal 9 (a and c) to add wording on new technology in relation to vehicle safety and lowering vehicle speeds.**

Technology has already played a role in improving road safety in London, including trials of speed limiting technology on buses and technological improvements to HGV safety. TfL will continue to trial and introduce new technology on the services under its direct control and work with others to encourage the same.

TfL recommends **no change** to the strategy in response to these comments.

### **Motorcycles**

Motorcycles have been allowed to use bus lanes on the TLRN on a permanent basis since January 2012, as well as bus lanes in an increasing number of London boroughs. An inconsistent approach is a concern as other road users don't know whether to expect and interact with motorcyclists in bus lanes. Calling for motorcycles to have access to bus lanes across the city is expected to help avoid confusion for motorcyclists travelling across borough boundaries.

TfL recommends **no change** to the strategy in response to these comments.

The strategy contains a focus box on motorcycle safety and sets out a number of proposals to address safety for motorcyclists. Motorcycles are also referenced in other sections of the strategy. Comments relating to the response from the Motorcycle Action Group (MAG) are acknowledged. The response from MAG has been reviewed along with other stakeholder responses to the consultation.

TfL recommends **no change** to the strategy in response to these comments

Proposal 11 (b) sets out the strategy's plans for raising the standard of motorcycle safety training in London, going beyond the minimum required by law.

TfL recommends **a change to Proposal 11 (b) to clarify the wording around motorcycle safety training.**

### **Speed**

The strategy supports more 20mph zones, including on the TLRN. Whilst opposition to more 20mph zones is acknowledged, there has also been support expressed for further roll out of 20mph limits. Lowering speeds is fundamental to reducing road

danger because a person is five times less likely to be fatally injured if hit at 20mph than at 30mph.

Enforcement of the speed limit is the responsibility of the local police forces and TfL will continue to work with them on this. Proposal 9 (d) sets out plans for the delivery of a programme of training, education and (working with the police) enforcement activity.

In many cases the best way to enforce speed limits is through better street design and the strategy encourages this across London's street network.

TfL recommends **a change to Proposal 9 (a) to add** additional wording on 20mph limits on the TLRN and in other locations across the city, as well as better street design to aid enforcement.

### **Education and training**

Proposal 9 (d) in the strategy sets out plans for the delivery of a programme of training, education and enforcement activity to improve the safety and road user behaviour. Raising awareness of good road user behaviour amongst all road users is the right approach to improving safety and reducing collisions and anti-social behaviour on London's street network. The strategy provides the necessary direction for this approach. TfL will continue to work closely with the police, including funding the Metropolitan Police's Cycle Safety Team, to ensure enforcement against dangerous behaviour from all road users.

TfL recommends **no change** to the strategy in response to these comments.

### **Post-collision**

The suggestion of more transparency in collision investigation has been acknowledged.

TfL recommends **a change** to the text in the final strategy to include 'Post-Collision' as one of the focus areas for achieving a reduction in the danger posed by motor vehicle journeys.

TfL recommends **a change to Proposal 9 to add** an additional point (e) on working with stakeholders to improve the emergency response to collisions, including post-collision reporting and accountability.

### **6.3.7 Active, inclusive and safe travel – Improving personal safety and security (Policy 3 and proposals 12-14)**

#### **Comments in support**

We received 91 supportive comments from stakeholders and businesses and 8 supportive comments from the public. Particular areas of support were:

- The proposals to ensure crime and fear of crime remain low (especially through designing secure environments and integrated policing)
- Reducing crime on streets and public transport
- A more visible police / staff presence
- Prioritising the tackling of ‘high-harm’ crimes, such as sexual offences and hate crime, on London’s streets, and improving safeguarding response to protect vulnerable adults and children
- The proposed measures to reduce motorcycle theft and motorcycle / moped related crimes
- The proposals to respond to, and counter, terrorist threats to London

#### **Comments noting concerns or opposition**

We received 33 comments of concern from stakeholders and businesses and 145 comments of concern from the public. Particular areas of concern were:

- Safety on public transport and it being a barrier to use
- Safety on streets due to crime / anti-social behaviour / terrorism and this being a barrier to active travel

#### **Comments making suggestions**

We received 65 comments of suggestion from stakeholders and businesses and 80 comments of suggestion from the public. Key suggestions included:

- Plans need to be more ambitious to make London’s streets safer and more secure
- Calls to improve police provision / visibility
- Strategy needs to address that local safety and anti-social behaviour need policing too
- Proposal 14 should be revised to take into account hostile vehicle prevention in a way that compliments and contributed to the Healthy Streets Approach

## **TfL response and recommendation**

The concerns about safety on public transport and at a street level are acknowledged. The strategy outlines plans to address these concerns with a focus box on pages 68-69. Policy 3 and proposals 12-14 outline plans to improve safety and security across the transport system. One of the 10 Healthy Streets Indicators is 'People feel safe' which states that the whole community should feel comfortable and safe on our streets at all times. The Healthy Streets Approach is considered across the strategy and will also be embedded into new LIP funding guidance.

**TfL recommends no change to the strategy in response to these comments.**

The strategy supports working closely with the British Transport Police and the Metropolitan Police to ensure the safety and security of customers and staff across the transport network. This is necessary to encourage more people to walk, cycle and use public transport. If people do not feel safe using the street network and transport system it will undermine the central aims of the strategy. Policy 3 in the strategy and the associated Proposals 12 -14 outline how safety and security will be improved across the transport system and also on London's streets.

**TfL recommends no change to the strategy in response to these comments.**

Suggestions in relation to Proposal 14, ensuring the Healthy Streets Approach is adopted when introducing on-street measures to combat the threat of attack from hostile vehicles, have been acknowledged.

**TfL recommends a change to Proposal 14 and the accompanying narrative to clarify how the Healthy Streets Approach will be adopted when protecting public spaces to counter, current and future terrorist threats to London.**

## **6.3.8 Making more efficient use of the street network (Policy 4)**

### **Comments in support**

We received 87 supportive comments from stakeholders and businesses and 518 supportive comments from the public. Particular areas of support were:

- Plans for reducing traffic and congestion
- The prioritisation of space-efficient modes of transport
- Plans for increased co-operation between the boroughs, TfL and highways England on road management and planning
- Policies that improve traffic flow (e.g. improve road work information, improved signal phasing)

### **Comments noting concerns or opposition**

We received 48 comments of concern from stakeholders and businesses and 388 comments of concern from the public. Particular areas of concern were:

#### **Congestion management and displaced traffic**

- New measures will make traffic congestion worse
- Car use cannot be reduced further without adverse economic impacts
- Displacement of traffic onto tertiary / residential roads from policies and sat-navs
- Displacement of congestion from car-free areas / areas with road user charging
- Reducing road widths will increase congestion, pollution and accidents

#### **Motorcycles and PHVs**

- The strategy fails to consider / opposes motorcycles /PTWs as a viable solution to reducing congestion, accidents and pollution
- The number of private hire vehicles on London's roads

### **Comments making suggestions**

We received 65 comments of suggestion from stakeholders and businesses and 235 comments of suggestion from the public. Key suggestions included:

#### **Defining essential traffic**

- Policy should include a definition of essential traffic

## Traffic Management

- Traffic management improvements should be on a whole network basis (including clarifying relationship between TfL, boroughs, TLRN and borough roads)
- There should be policies that improve traffic flow (improve road work information and co-ordination and times of operation / fewer bus lanes / improved signal phasing)
- Implementing more flexible working and school hours to help reduce rush hour congestion
- Roads to be widened to cope with future traffic demands/expanding the road network

## TfL response and recommendation

### Congestion and reducing car use

The strategy recognises that congestion is a significant issue facing London and that it has a number of negative impacts on life in London. Section b of the Healthy Streets and healthy people chapter states that a reduction in traffic of 10-15 per cent by 2041 is needed to keep congestion in check, whilst also achieving the aims of the strategy. Policy 4 and associated proposals, as well as policies and proposals across the strategy to encourage more active, efficient and sustainable travel, outline plans to reduce the amount of traffic on London's roads and encourage a change in the way people travel around the city. It is acknowledged that changes to allocation of road space will need to be carefully managed; however 75 per cent of congestion is caused by there being too much traffic on the street network, therefore the strategy supports managing the street network more efficiently and encouraging more space efficient modes to help reduce congestion.

TfL recommends **no change** to Policy 4 in response to these comments.

TfL recommends **a change** to the narrative in the 'Improving London's Streets' section of the strategy **to clarify** the approach to the way in which street space is allocated.

### Displacement of traffic

As London's strategic transport authority, TfL has a role to play in ensuring that proper strategic oversight is given to large scale schemes that are likely to displace traffic elsewhere and also for local traffic demand management schemes to minimise conflict across borough or regional boundaries.

TfL recommends **a change to the narrative to clarify** TfL's role in the strategic management of local traffic reduction schemes.



## Motorcycles and PHVs

Motorcycles are part of the transport mix in London. However, the strategy is promoting active, efficient and sustainable travel. Whilst motorcycles may provide a more efficient use of road space than cars, they are less efficient than walking, cycling and public transport and they don't address active travel. There are also concerns relating to safety and motorcycling which the strategy seeks to address. The strategy includes a dedicated section on improving motorcycle safety, including expanding initiatives such as allowing motorcycles to use bus lanes across the city.

TfL recommends **no change** to the strategy in response to these comments

In recent years the number of private hire vehicles on London's roads has increased as has the number of PHV licences that have been issued (as set out in Figure 9 in the strategy). This is especially true in central London. The strategy acknowledges this and includes proposals to keep under review new and existing road user charging schemes to make sure they remain fit for purpose in a rapidly changing environment. The strategy also sets out ambitions to seek additional powers to restrict PHV numbers.

TfL recommends **no change** to the strategy in response to these comments.

## Essential traffic

Comments on providing a definition of what is meant by essential traffic have been acknowledged. In order to provide clarity to the strategy it is suggested that this term be removed from the final strategy.

TfL recommends **a change** to the strategy to **remove** the term essential traffic.

## Traffic management

TfL oversees the management of the TLRN and also London's network of traffic signals to ensure the road network can operate as efficiently as possible. TfL also works closely with London's boroughs and other highway authorities operating in the city to reduce delays and disruption on the network. The strategy sets out a central aim to encourage more walking, cycling and public transport use and this will shape the way in which traffic is managed over the course of the strategy. Bus lanes are the responsibility of both TfL and London's boroughs. They play an essential role in ensuring that buses can transport over 6 million people on a daily basis and there are plans set out in the strategy to ensure these remain effective and are improved wherever possible.

TfL recommends **no change** to the strategy in response to these comments.

The aim of the strategy is for 80 per cent of trips to be made on foot, by bike or by public transport by 2041. Whilst more flexible working and education hours may help to reduce peak demand, a more effective approach would be to encourage more sustainable travel to and from school or work. This will help encourage more active travel and improve air quality whilst also reducing congestion at peak times.

Proposal 7 in the strategy also highlights the work that the Mayor and TfL will undertake with schools, employers and community groups to encourage more sustainable travel for a range of trips.

TfL recommends **no change** to the strategy in response to these comments.

The central aim of the strategy is to encourage more active, efficient and sustainable travel, with more trips being undertaken on foot, by cycle or by public transport. Space for expanding the road network in London is limited due to the historic nature of the city's streets, it is also expensive and not an acceptable approach in London. Even if building more roads was more cost effective and easier to deliver, it would likely generate more traffic and lead to worsening congestion and poor air quality. This would go against the central aim of encouraging more trips on foot, by bike and by public transport.

TfL recommends **no change** to the strategy in response to these comments.

## **6.3.9 Making more efficient use of the street network - Efficiency of deliveries and servicing (proposals 15-16)**

### **Comments in support**

We received 216 supportive comments from stakeholders and businesses and 11 supportive comments from the public. Particular areas of support were:

#### **Consolidation and distribution**

- A network and promotion of consolidation/ distribution centres
- industrial land being protected to enable freight distribution
- The proposed extension of collection points for personal deliveries

#### **Construction and safety**

- Tailoring relevant proposals specifically to construction freight
- Proposal to work with business and the freight industry to improve the efficiency and safety of freight and servicing activity in London
- The development of a London Lorry Standard (with careful implementation)
- Reducing construction traffic in London

#### **Rail and river**

- River and rail freight / consolidation
- A strategy for the use of river and rail in transporting freight

#### **General**

- TfL engagement with freight sector and businesses on the issue
- The 10 per cent reduction of peak time freight traffic aim
- Cargo bikes / e-bikes as alternative forms of freight
- Optimisation of freight (e.g. consolidation centres and efficient last mile systems)

### **Comments noting concerns or opposition**

We received 118 comments of concern from stakeholders and businesses and 90 comments of concern from the public. Particular areas of concern were:

#### **Targets and growth**

- The feasibility of the 10 per cent reduction aim

- The strategy does not address potential future growth in HGVs
- Deliveries of online shopping are making roads busier

### **Deliveries**

- Banning workplace deliveries
- The Healthy Streets Approach does not sufficiently consider freight needs

### **Freight optimisation**

- The effectiveness and cost of consolidation centres
- Opposition to night time deliveries and concern about the practicalities surrounding this

### **Rail and river freight**

- The strategy is too negative towards rail freight
- The suitability of moving freight to river / rail
- The lack of space on the rail network for existing rail freight demand and practicalities of rail freight in urban areas

### **Comments making suggestions**

We received 357 comments of suggestion from stakeholders and businesses and 402 comments of suggestion from the public. There was a call for a dedicated Freight Commissioner and other key suggestions included:

### **New technology and alternative freight**

- Autonomous vans and lorries should be used for freight delivery, and more consideration should be given to this in the strategy
- The strategy should consider drone and droid freight
- The strategy should consider smaller freight vehicles including e-cargo bikes and ePTWs
- Encouragement of the use of cargo bikes/e-bikes for deliveries

### **Environment**

- Need for low / zero emission delivery vehicles and incentives to adopt
- Need for low emission / electric last mile delivery vehicles
- Consideration of noise nuisance and pollution resulting from retiming of freight

### **Reducing and optimising freight**

- Optimisation of freight

- Recognition/expansion of the work the Business Improvement Districts (BIDs) are doing in consolidation of deliveries
- Reducing HGV movements
- Restricting the times of day that delivery vehicles can operate
- Safeguarding industrial distribution centres

### **Loading and deliveries**

- More loading bays and in more convenient locations
- More robust loading restrictions on delivery vehicles
- Cycle lanes should not be placed across loading bays
- The use of ITS to manage kerbside delivery and loading
- Banning personal deliveries and more effective use of click and collect, including at transport hubs
- Restricting rather than banning workplace deliveries
- A review of night-time delivery restrictions
- Encouraging off-peak deliveries (out of hours / night-time)
- Increasing the efficiency of last-mile delivery system, including introducing Delivery Service Plans, and incentives to adopt these.

### **Rail and river**

- More emphasis should be placed on putting freight on the river (especially for construction)
- More use of canals for freight
- Rail freight facilities / depots/land must be safeguarded
- Suggest strategic rail freight interchanges (including mainline stations)
- The strategy should support and encourage rail freight – including requests for a rail freight strategy

### **TfL response and recommendation**

#### **General**

Responses to the 'Efficiency of deliveries and servicing' section of the strategy have largely been accepted. In light of this it is recommended that this section of the strategy is revised to reflect the feedback that has been received. This will clarify activity around delivery and servicing and add further detail on a number of key areas.

TfL recommends **a change** to the strategy **to add** additional detail to the narrative on delivery and servicing activity in the 'Efficiency of deliveries and servicing section'.

TfL recommends **a change** to Proposal 15 to separate it out into two separate Proposals **to add** further clarity and additional detail.

TfL recommends **a change** to Proposal 16 **to add** additional points to the Proposal to provide further clarity.

### **Freight Commissioner**

The freight sector is essential to London's success. Freight will be a key focus area for the Deputy Mayor for Transport and for TfL as the strategy is taken forward and embed within TfL's operations. The Deputy Mayor will be working closely with the sector, thinking about how freight operates in London in the context of the broader transport strategy and other key modes of transport. This will ensure freight is given the right level of priority and will be a key area of delivery for TfL.

TfL recommends **no change** in response to these comments.

### **Targets and growth**

As an interim milestone, the Mayor aims to reduce lorries and vans in central London, during the AM peak, by 10 per cent by 2026. This is set within the wider context of working with the business and the freight and servicing industry to enable them to use the street network more efficiently. This milestone is ambitious, but achievable based on TfL analysis, which is available in the MTS evidence base which has been published alongside the strategy online:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

The Vision chapter of the strategy notes that freight traffic in central London, in the AM peak, is set to increase by around 10 per cent in the next 10 years. However, current trends suggest that much of this growth is being driven by an increase in the number of vans on London's streets. It is recognised that more emphasis should be placed on the anticipated growth of freight traffic in London.

TfL recommends **no change** to the strategy in response to comments on the 10 per cent reduction aim.

TfL recommends **a change** to the 'Efficiency of deliveries and servicing' section **to add** additional text on the growth of freight traffic.

TfL recommends **a change** to the strategy **to add** an additional proposal to provide more clarity on the need to reduce the impact of freight on London's roads.

### **Loading and Deliveries**

Suggestions around loading activity have been acknowledged. There is more scope to improve loading facilities and also to reduce the impact that kerbside loading and servicing in particular can have on the city's streets. This includes giving

consideration to thoughtful design and management of the kerbside when designing new streets and transforming places.

TfL recommends a **change** to the narrative text in the 'Efficiency of deliveries and servicing' section of the strategy **to add** a section on reducing the impact of kerbside load and servicing.

TfL recommends a **change** to the strategy **to add** a new proposal to provide further detail on improving the design and management of loading and servicing activity at the kerbside and off-street.

In order to ensure the efficiency of deliveries and servicing it is important to acknowledge the impact that the changing nature of personal deliveries can have on streets, particularly in central London and in town centres. The strategy supports better use of London's comprehensive network of collection points. The concern around banning of deliveries to workplaces has been acknowledged and an alternative approach is suggested.

TfL recommends a **change to Proposal 15 to remove** reference to the banning of personal deliveries.

TfL recommends a **change** to the narrative text **to add** reference to encouraging more efficient deliveries to individuals in central London and town centres.

To ensure London's businesses can continue to receive the goods and services they need, achieving Healthy Streets means that all aspects of freight and servicing activity need to be actively managed. This is especially important in locations such as Oxford Street which will be transformed to create better environments for pedestrians. Concerns around the relationship between the Healthy Streets Approach and freight and servicing activity have been acknowledged.

TfL recommends a **change** to the narrative in the 'Efficiency of deliveries and servicing' section of the Healthy Streets and Healthy People chapter of the strategy **to add** additional narrative text **to clarify** how the Healthy Streets Approach will consider and benefit efficient deliveries and servicing.

### **Reducing and optimising freight**

Consolidation centres may provide an effective solution for more efficient management of freight activity in some instances. The Mayor supports the expansion of the existing network of consolidation facilities for the construction industry in particular and also the use of micro-distribution centres. It is acknowledged that there are some concerns about the effectiveness and cost of consolidation centres, a number of changes are therefore recommended to the final strategy.

TfL recommends a **change** to the strategy **to add** text to the narrative in the 'Efficiency of deliveries and servicing' section of the strategy **to clarify** the strategy's position of consolidation facilities.

TfL recommends a **change** to the strategy **to add** additional detail to a new Proposal to outline plans to review the potential benefits of regional consolidation and distribution networks.

Whilst the strategy does support the re-timing of deliveries outside of peak hours, it does not specifically suggest activity be shifted to the night-time. The strategy focuses on making it easier to re-time activity where this is appropriate. Re-timing freight activity can have a number of significant benefits including reducing congestion at peak times and also reducing road danger by removing the potential for collisions between large freight vehicles and those on cycles who often share the street at the busiest times of day. It is recognised there is some concern in relation to night-time deliveries and therefore a number of changes are suggested to the strategy.

TfL recommends a **change** to the narrative text in the 'Efficiency of deliveries and servicing' section of the strategy **to add** an additional section on retiming deliveries to clarify the strategy's position on this.

TfL recommends a **change** to the strategy **to add** a new Proposal to reference the re-timing of goods and services to times where they will have the least impact on streets.

The Mayor and TfL are supportive of activity that some Business Improvement Districts (BIDs) have already undertaken around consolidation. The strategy sets a number of ways in which the Mayor and TfL will work with BIDs to improve the efficiency of deliveries and servicing.

TfL recommends a **change** to the narrative text in the 'Efficiency of deliveries and servicing' section of the strategy to further highlight how the Mayor and TfL will work with BIDs on freight related activity.

The 'Efficiency of deliveries and servicing' section of the strategy sets out a number of ways to reduce the impact of freight on London's streets and ensure it is managed more efficiently. This includes the aim of reducing freight activity by 10 per cent in central London in the AM peak by 2026, improving the efficiency of freight networks, investigating joint procurement opportunities and re-timing deliveries. Further expansion of the existing network of construction consolidation centres may help to reduce the number of HGVs in particular on London's roads. The strategy supports further expansion of these centres and has set out support for all of London to be within a 30-minute drive of a construction consolidation centre.

TfL recommends a **change** to the narrative text in the 'Efficiency of deliveries and servicing' section of the strategy **to add** further detail on optimisation of freight and more efficient HGV movements.

TfL recommends a **change** to the strategy to add a new proposal **to add** more detail on construction consolidation centres.



The strategy supports the safeguarding of industrial land and the planning of a strategic distribution network. Safeguarding of industrial land will be delivered through the revised London Plan. Construction Logistics Plans can also play a role in encouraging greater use of such centres.

TfL recommends **a change** to the narrative text in the 'Efficiency of deliveries and servicing' section of the strategy **to add** additional wording on the identification and protection of new sites for load consolidation.

## **Rail and river freight**

Concerns relating to the portrayal of rail freight are acknowledged. The value of rail freight is recognised, but careful planning is needed to make best use of rail capacity for everyone. This can be achieved by the following principles:

- Supporting the shift of road freight onto cleaner modes, such as rail and river
- Moving freight at quieter times of day when demand for passenger services is much lower
- Supporting projects that allow more freight to run on routes bypassing London, where more capacity is available and the demand for passenger services is much lower

Additional coverage of rail freight is given in Chapter 4 of the strategy and in the associated section of this report. To reflect the benefits that moving more freight on the river and rail networks, the following changes are recommended:

TfL recommends **a change** to Proposal 16 in the strategy **to add** additional points to clarify how the efficiency of freight and servicing trips on London's strategic transport network can be improved.

TfL recommends **a change** to the narrative text in the 'Efficiency of deliveries and servicing' section to add narrative on the benefits of rail freight.

TfL recommends **a change** to the 'Efficiency of deliveries and servicing' section of the strategy **to add** a focus box on making the most of London's rail network for freight and passengers.

It is acknowledged that more freight could potentially be moved on London's waterways. This might include not only the River Thames, but also the city's network of canals and other rivers. As with moving more freight by rail, this could help reduce the amount of freight being moved on London's streets.

TfL recommend **a change** to Proposal 16 **to clarify** and support the movement of more freight on the city's waterways.

TfL recommends **a change** to the narrative text in the 'Efficiency of deliveries and servicing' section to add narrative on the benefits of moving more freight by water.

Suggestions for safeguarding rail freight facilities and associated land have been acknowledged, as have suggestions for strategic rail freight interchanges. The London Plan will support this further.

TfL recommends **a change** to the narrative text in the ‘Efficiency of deliveries and servicing’ section to add narrative on identifying and protecting new sites for load consolidation, particularly those adjacent to rail or river services.

### **New technology and alternative freight**

Whilst new technology will play a role in delivering more efficient servicing and deliveries, the strategy needs to maintain an open approach to new technology as this is a continuously developing area of policy. Policy 21 in Chapter 6 sets out the strategy’s approach to new technology. It is recommended that the link between Policy 21 and new freight technology is strengthened.

TfL recommends **a change** to the strategy in response to comments relating to new technology and freight, **to strengthen** the link between the freight chapter and Policy 21 in Chapter 6.

The strategy is supportive of more delivery and servicing activity taking place on both foot and by cycle where practical. This type of activity can be particularly effective as part of last mile deliveries and servicing and when supported by micro-distribution services.

TfL recommends **a change** to the strategy **to add** additional wording to a new proposal to support more delivery and servicing activity on foot and by cycle.

### **Environment**

Section C of the ‘Healthy Streets and healthy people’ chapter sets out in more detail the strategy’s approach to improving air quality and reducing emissions and noise from road transport. This is further supported by the Mayor’s London Environment Strategy. It is acknowledged that low emission vehicles or modes of transport can play an important role in delivery and servicing activity in London. It is also acknowledged that careful consideration needs to be made when retiming freight to minimise any negative impacts on quality of life.

TfL recommends **a change** to the strategy to add a new proposal to support the use of zero emission vehicles and walking and cycling deliveries for last mile deliveries and servicing.

TfL recommends **a change** to the strategy to add a new proposal to support the retiming of deliveries of goods and services to times where they will have least impact on streets.

### **6.3.10 Making more efficient use of the street network – Reducing car use (proposal 17)**

#### **Comments in support**

We received 155 supportive comments from stakeholders and businesses and 236 supportive comments from the public. Particular areas of support were:

- General support for reducing car dependency and car use – particularly in outer London
- Transforming the experience of the walking and cycling environment in central London by reducing the dominance of vehicular traffic
- General support for car clubs
- Encouraging more car club use
- Particular support for proposals that link the provision of car clubs for residents when paired with a reduction in the availability of private parking

#### **Comments noting concerns or opposition**

We received 14 comments of concern from stakeholders and businesses and 496 comments of concern from the public. Particular areas of concern were:

#### **Concerns and opposition to reducing car use**

- Oppose reducing car use / oppose prosecuting car drivers / oppose removing vehicles completely as unrealistic / unfair
- Outer London boroughs will find reducing car use challenging
- Reducing car use too much will reduce trade / increase cost of living for Londoners
- Measures to reduce car use will not be successful

#### **Parking**

- On-street and on-pavement parking
- Reductions in parking spaces

#### **Comments making suggestions**

We received 102 comments of suggestion from stakeholders and businesses and 394 comments of suggestion from the public. Key suggestions included:

## **Car clubs and car sharing**

- Inclusion of a clear car club vision in the final strategy
- More reference to different models of car club and their differential ability to address issues in different areas (central / inner / outer)
- There should be more car clubs in outer London
- Strategy should support car sharing

## **Reducing car use**

- A variety of modes will be needed to reduce car use, not just public transport
- Car use is necessary sometimes and that in some areas and situations there is no alternative to the car
- Public transport needs to improve to reduce car use
- Reducing car parking (e.g. on red routes)

## **Parking**

- Increasing parking (e.g. pay and display on all roads)

## **TfL response and recommendation**

### **Concerns, opposition and suggestions around reducing car use**

The central aim of this strategy is to achieve an 80 per cent mode share target for active, efficient and sustainable modes of travel by 2041. This means encouraging more people to switch, from using their car to walking, cycling and using public transport. The Vision chapter of the strategy, along with chapters 3-5, sets out the benefits of changing the way in which people move around the city, including improved physical and mental health, less congestion and improved air quality. To support such a shift the strategy sets out plans to improve environments for walking and cycling and also investing in public transport.

**TfL suggests no change to the strategy in response to these comments.**

It is acknowledged that reducing car use will be more challenging in some parts of the city than in others. TfL will work with outer London boroughs to develop the right measures for their part of the city. Chapter 6 of the strategy contains details on how the strategy will be delivered. In areas currently less well served by public transport, improvements will be made. This is outlined in Figure 34 of the strategy. The car may be the most efficient mode in some parts of the city that are served less well by public transport.. Schemes such as the Liveable Neighbourhoods programme, the London-wide strategic cycle network, plans for improved suburban rail and bus services will provide alternatives to the car in many areas of outer London.

TfL recommends **a change to Chapter 6 to add** further detail on how mode shift will be achieved over the lifetime of the strategy and in different parts of London.

TfL recommends **no change** to Proposal 17 in response to these comments.

In terms of increasing costs, the Mayor has introduced a fares freeze across the TfL network and is lobbying central government to match this across the suburban rail network in London. The Hopper ticket on the bus network has also helped to make public transport cheaper to use. Walking and cycling are both affordable modes of transport. Switching to these modes is cheaper than owning or using a car. By helping to make more efficient use of street space the strategy aims to improve the reliability of deliveries and other services, thereby reducing any costs incurred as a result of delays. Schemes such as the Liveable Neighbourhoods programme will help improve town centres for walking, cycling and public transport thereby creating more enjoyable places in which to live, work and visit.

TfL recommends **no change** to the strategy in response to these comments.

## **Parking**

Converting space used for parking to provide better conditions for walking, cycling and public transport can also help reduce car use and might form part of the individual borough plans to address this. In some instances, the strategy supports the provision of car clubs as a means of providing residents access to infrequent car journeys, following a reduction in overall parking supply for private vehicles.

Currently the Mayor and TfL also look to ensure that at new development, the number of parking spaces provided is restricted, particularly in areas that are well connected by public transport. This ensures new development does not lead to additional congestion and supports the wider draft London Plan and the significant levels of growth it sets out following the Good Growth principles in Chapter 5 of the strategy, as well as the aim to encourage more active and sustainable travel as set out in the MTS.

Parking standards are within the scope of the draft London Plan.

TfL recommends **no change** to the strategy in response to these comments.

## **Car clubs and car sharing**

The strategy makes reference to car clubs and Proposal 17 supports the provision of car clubs. Car clubs can have a role to play in reducing overall car use in London, providing they are used as an alternative to private cars, rather than to walking, cycling or public transport. It is acknowledged that there a number of different models of car club and approaches to car sharing. Proposal 17 outlines how this can be supported through replacing private car parking in inner or outer London with dedicated spaces for car clubs. The suggestion to include a car club vision in the strategy is acknowledged, but the approach to car clubs must be part of a wider set

of measures to reduce car use in order to prevent any unintended consequences, such as a net increase in car travel resulting from non-car owners driving more.

TfL recommends **no change** to the strategy in response to these comments.

Car sharing has the potential to reduce car ownership in some places, and for some households; however car travel remains an inefficient use of road space and should only be encouraged where there are no alternatives or for trips which are not able to be reasonably switched. Figure 53 in the MTS illustrates this point by showing how much road space is needed to cater for 67 people travelling by various modes. The amount of space required for 67 people in private cars is the same as that needed for 67 people travelling in car club cars, or other shared vehicles.

Sharing vehicles might lead to a reduction in ownership and a resulting reduction in demand for parking, however to reallocate space from parking this would need to be significant and concentrated in specific places; it would be less impactful if reductions in demand for parking were in relation to off-street spaces as opposed to those on-street.

Furthermore, the potential for shared car services to be appealing to households which currently do not have access to a car means that car sharing in many guises would lead to an increase in the number of trips undertaken by car. This may be especially true at certain times of day or when the weather is poor.

TfL recommends **no change** to the strategy in response to these comments.

### **6.3.11 Making more efficient use of the street network – Changing the way we pay for roads (proposal 18-19)**

#### **Comments in support**

We received 108 supportive comments from stakeholders and businesses and 142 supportive comments from the public. Particular areas of support were:

- General support for road user charging / increased road user charges
- A more sophisticated road user charging system
- Continuously reviewing road charging schemes
- The introduction of additional road user charging schemes
- Local road user charging schemes
- Workplace parking levies

#### **Comments noting concerns or opposition**

We received 78 comments of concern from stakeholders and businesses and 488 comments of concern from the public. There was a level of general opposition to road user charging / increased road user charges. Particular areas of concern were:

##### **Car drivers**

- Opposition to prosecuting car drivers
- Road user charging is unfair on people with lower incomes.
- Opposition to workplace parking levies – unfair to penalise those going to work
- The introduction of road user charging without sufficient transport alternatives

##### **Other Impacts**

- Road charges for services / freight will increase prices for consumers
- Displaced traffic avoiding charging areas

##### **Motorcycles**

- Older PTWs being included in charging schemes - users tend to be low-income and the PTWs are a more efficient mode of transport than cars
- Oppose including motorcycle and scooters in Congestion Charge

##### **Charging Schemes**

- Devolution of some road user charging schemes to boroughs in terms of consistency/pricing/driver understanding/displacing traffic

- Oppose Congestion Charge

### **Comments making suggestions**

We received 189 comments of suggestion from stakeholders and businesses and 309 comments of suggestion from the public. Particular suggestions included:

#### **Congestion Charge**

- All vehicles should pay the Congestion Charge
- Congestion Charge should be increased
- More detail on plans for road pricing is required especially detail on updating the Congestion Charge
- Urgently reforming the Congestion Charge
- Extending the Congestion Charge zone
- Extending Congestion Charge & ULEZ to private hire vehicles/ taxis, pending a review on impact
- Extending the Congestion Charge hours of operation

#### **New charging schemes**

- More detailed plans on road pricing are needed
- There needs to be separate charging systems for emissions and congestion
- A single charging system for emissions and congestion should be introduced
- Road user charging should reflect the pollution level of the vehicle
- Motorcycles / PTWs should be exempt from ULEZ / considered separately
- Road user charging should be introduced for the whole of Greater London
- Charging per mile
- There should be exemptions for vehicles such as emergency services and blue badge
- River crossings need to be included in all new schemes

### **TfL response and recommendation**

#### **Car drivers and motorcycles**

The central aim of the strategy is for 80 per cent of all trips to be undertaken by active, efficient and sustainable modes by 2041. The car is an inefficient way of moving around the city and contributes to increased congestion, inactivity, poor air quality, CO2 emissions, severance and road danger. The strategy clearly sets out how it will improve environments for walking and cycling and encourage greater



public transport use by investing in the network. The MTS evidence base provides further details of the analysis behind these aims:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

The Mayor is seeking to reduce the cost of travel in London. He has introduced a fares freeze across the TfL network and is lobbying central government to match this across the suburban rail network in London. The Hopper ticket on the bus network has also helped to make public transport cheaper to use. Walking and cycling are both affordable modes of transport. Switching to these modes is often cheaper than owning or using a car.

A workplace parking levy is one option that is referenced in the strategy which may be suitable for use at a local level. Any revenue raised by such schemes would be invested back into the transport network, including walking and cycling schemes, to improve alternatives for people choosing not to travel by car. Any future charging schemes will be subject to a statutory public consultation and Mayoral approval. Any such schemes would be developed separately in conformity with the policies and proposals of the strategy and detailed information, including information on impacts, would be made available as part of the consultation.

**TfL recommends no change to the strategy in response to these comments.**

### **Other impacts and charging schemes**

By helping to reduce congestion, the strategy aims to improve the reliability of deliveries and other services, thereby reducing any costs incurred as a result of delays. Any future charging schemes will be subject to a statutory public consultation and Mayoral approval. As in the previous case, any such schemes would be developed separately in conformity with the policies and proposals of the strategy and detailed information, including information on impacts, would be made available as part of the consultation.

**TfL recommends no change to the strategy in response to these comments.**

As London's strategic transport authority, TfL has a role to play in ensuring that proper strategic oversight is given to large scale schemes that are likely to displace traffic elsewhere and also for local traffic demand management measures schemes to minimise conflict across borough or regional boundaries.

**TfL recommends a change to Proposal 19 to clarify TfL's role in the strategic management of road user charging schemes.**

**TfL recommends a change to Proposal 20 to clarify TfL's role in the strategic management of local traffic reduction schemes.**

## **Congestion Charge**

The concerns and suggestions around the Congestion Charge are acknowledged. When the Congestion Charge was first introduced the immediate impact was a reduction in congestion of 30 per cent. Whilst traffic in Central London has continued to reduce by a small amount each year, the congestion for this smaller number of vehicles has increased. This would be far worse without the Congestion Charge zone in place. Fifteen years after the introduction of the Congestion Charge, the challenges facing London have changed. The bustling night time economy and cultural scene mean that more people than ever wish to enjoy all that London has to offer in the evenings when traffic levels are at their highest and weekends when traffic levels are now similar to weekdays. The number of vehicles that are exempt from the charge such as private hire vehicles has also increased.

The strategy states in Proposal 18 that the Congestion Charge will be kept under review: any future plans to change the Congestion Charge would be subject to a statutory public consultation and Mayoral approval and would be developed in conformity to the MTS.

[TfL recommends \*\*no change\*\* to the strategy in response to these comments.](#)

## **New charging schemes**

The strategy states in Proposal 19 that the Mayor will give consideration to the next generation of road user charging schemes. These could be developed by TfL or by London boroughs and would be implemented subject to consultation and Mayoral approval. The suggestions from the consultation have been acknowledged and more detailed plans will be developed in due course, including consideration of any exemptions for specific road users.

[TfL suggests \*\*no change\*\* to the strategy in response to these comments.](#)

Section C of the Healthy Streets and healthy people chapter of the MTS covers issues relating to air quality and emission based charging schemes. Specifically Policy 5 and accompanying proposals set out plans for the Ultra Low Emission Zone (ULEZ). The recently launched T-Charge and the forthcoming ULEZ apply a charge to vehicles based on how polluting a vehicle is. Plans for ULEZ are being consulted upon separately from the MTS. In order to provide clarity for customers any current and future charging schemes must be able to work together. Any future schemes will be subject to a statutory public consultation and Mayoral approval. Any such schemes would be developed separately in conformity with the policies and proposals of the strategy and detailed information, including information on impacts, would be made available as part of the consultation

[TfL recommends \*\*no change\*\* to the strategy in response to these comments.](#)

With regard to river crossings, user charges would apply as a way of managing demand and paying for the scheme at the new Silvertown Tunnel and, once that is open, the nearby Blackwall Tunnel. Additionally, a number of central London

crossings already fall within the Congestion Charge zone, and are therefore already subject to user charges within certain hours, albeit they are not charged on an individual basis and the objective here is to manage congestion. In considering future crossing schemes, user charges would be considered as an option.

TfL recommends **no change** to the strategy in response to these comments.

### **6.3.12 Making more efficient use of the street network – Borough Traffic Reduction Strategies (proposal 20-21)**

#### **Comments in support**

We received 27 supportive comments from stakeholders and businesses and 2 supportive comments from the public. Particular areas of support were:

- Borough traffic reduction strategies
- Policies / proposals to reduce car use
- Proposals to reduce driving to school
- TfL working with boroughs to implement new Traffic Demand Management schemes
- Filtered permeability schemes as part of traffic reduction strategies

#### **Comments noting concerns or opposition**

We received 64 comments of concern from stakeholders and businesses and 14 comments of concern from the public. Particular areas of concern were:

- Opposition to individual borough road user charging scheme
- Boroughs will be able to use road user charging schemes to displace traffic to other boroughs
- If strategies are not enforced there will be inequalities between boroughs / particular populations
- Boroughs are expected to lead on traffic reduction strategies and how this might be funded

#### **Comments making suggestions**

We received 52 comments of suggestion from stakeholders and businesses and 26 comments of suggestion from the public. Key suggestions included:

- Revenue from road user charging should be devolved to boroughs
- TfL should be more proactive at working with boroughs to reduce traffic
- A policy should be included to reduce parking
- Public transport needs to improve in order to reduce car use

#### **TfL response and recommendation**

Concerns around how local traffic reduction strategies and road user charging schemes might be co-ordinated have been acknowledged. As London's strategic transport authority, TfL has a role to play in ensuring that proper strategic oversight

is given to large scale schemes that are likely to displace traffic elsewhere and also for local traffic demand management schemes to minimise conflict across borough or regional boundaries.

TfL recommends **a change to Proposal 20 to clarify TfL's role in co-ordinating local traffic reduction schemes.**

The strategy does not mandate that boroughs will be required to introduce local road user charging schemes, but suggests that these might be a useful tool as part of a wider traffic reduction strategy. It will be for individual boroughs to decide what is appropriate for their local area. TfL will provide support and technical advice and expertise to aid in the development of borough traffic reduction strategies and to ensure that aforementioned strategic overview is maintained. TfL will also work with boroughs to fund additional schemes and improvements to help reduce traffic such as the Liveable Neighbourhoods programme and the development of a London-wide cycle network. Chapter 4 of the MTS also sets out the extensive plans to improve the public transport network, including providing more and improved services for areas of outer London.

TfL recommends **no change to the strategy in response to these comments.**

Reducing the availability of car parking is one approach to reducing car use and might form part of individual borough plans to address this. The space could then be reused for a variety of other purposes, such as cycle parking hangers or in some instances dedicated bays for car clubs to provide residents access to infrequent car journeys.

TfL recommends **a change to the strategy document to include additional detail on controlled parking zones.**

### **6.3.13 Improving air quality and the environment (Policy 5)**

#### **Comments in support**

We received 180 supportive comments from stakeholders and businesses and 378 supportive comments from the public. Particular areas of support were for:

- Further investment in and promotion of sustainable vehicles ( eg carbon neutral / electric)
- Ban on idling / promoting stop start technology
- Action to reduce / eliminate emissions from vehicles
- All new vehicles in London being zero emission by 2040
- Measures to improve air quality generally
- Policy that discourage diesel engine cars

#### **Comments noting concerns or opposition**

We received 46 comments of concern from stakeholders and businesses and 278 comments of concern from the public. Particular areas of concern were:

##### **Behaviour Change**

- A lack of detail on lowering vehicle demand / behaviour change campaigns
- People do not view pollution as being a product of their actions / habits

##### **Testing**

- Real driving emissions testing fails to adequately address air quality issues

##### **Targets**

- The target for all newly registered vehicles in London to be zero-emission by 2040 is under-ambitious
- The current level of pollution and associated health impacts

##### **Affordability**

- The affordability of low emission vehicles and societal impacts

#### **Comments making suggestions**

We received 119 comments of suggestion from stakeholders and businesses and 207 comments of suggestion from the public. Key suggestions included:

##### **Targets**

- Air quality proposals being accelerated with a more holistic perspective

- More needs to be done to reduce emissions
- There should be more emphasis placed on air quality / have more ambitious targets for reducing transport emissions
- An enhancement of policy 5 to meet World Health Organisation (WHO) emission levels
- Stricter enforcement of the idling ban

### **Behaviour change**

- A shift towards sustainable transport is needed to tackle negative health impacts of poor air quality and sedentary lifestyle
- Stronger messaging around the need to reduce vehicle use to improve air quality is required to achieve behaviour change

### **Alternative Fuels**

- Promoting a range of alternative fuels to achieve air quality targets

### **Retrofitting**

- An accreditation scheme for repowered / retrofitted vehicles
- More retrofitting of vehicles and retrofitting standards to be the same across the UK

### **TfL response and recommendation**

#### **Behaviour change**

The central aim of the strategy is for 80 per cent of trips to be made by active and sustainable modes by 2041. The policies and proposals set out in sections A and B of the Healthy Streets and healthy people chapter and throughout the rest of the strategy in Chapters 4 and 5, detail how this will be achieved. Changing the way people travel around London and reducing emissions from buses, taxis & private hire vehicles and freight activity will help improve air quality across London.

[TfL recommends \*\*no change\*\* to the strategy in response to these comments](#)

#### **Testing**

It is acknowledged that Real Driving Emissions testing has issues, especially in light of recent high profile cases. The MTS evidence base models the real world impact of its measures as opposed to real driving emissions testing as means of setting targets. This is referenced on Page 87 of the strategy.

[TfL recommends \*\*no change\*\* to the strategy in response to these comments.](#)

## Targets

The aims set out in the strategy have all been carefully considered in the context of London as a growing city and in light of currently available technology. Analysis that supports these aims can be found in the MTS evidence base, available on-line.

TfL recommends **no change** to the strategy in response to these comments.

It is acknowledged that poor air quality is a serious issue in London and damages people's health. Section C of the Healthy Streets and healthy people chapter details specific transport related schemes to tackle poor air quality resulting from transport. This supports the Mayor's London Environment Strategy which sets out further plans to improve the city's environment. This, together with the MTS, represents an ambitious set of plans to improve London's air quality.

TfL recommends **no change** to the strategy in response to these comments.

It is generally not appropriate to include references to external organisations over which the Mayor has no control. However, the narrative text preceding the policy has been edited to refer to leading health experts, rather than specifically the World Health Organisation.

TfL recommends **a change to the narrative to add** reference to leading health experts.

## Alternative fuels

The strategy takes a technology neutral approach to the promotion of alternative fuels and it is not felt appropriate to advocate for specific fuels in the strategy. Policy 6 makes reference to this position. Further detail on future technology in relation to the strategy is covered in Chapter 6 under Policy 21.

TfL recommends **no change** to the strategy in response to these comments.

## Retrofitting

The Mayor and TfL are supporting the Government's national accreditation scheme for vehicle retrofit.

TfL recommends **no change** to the strategy in response to these comments.

## Affordability

Whilst it is likely that the cost of low emission vehicles will drop overtime as they become more popular, the direct cost of these vehicles is outside the control of the Mayor and TfL. The strategy is focused on encouraging a shift to active, efficient and sustainable modes which are often cheaper than owning and running a car. Walking and cycling in particular are free or low cost ways of getting around. The Mayor is also committed to making public transport more affordable and has already



introduced a fares freeze across the TfL network and is lobbying central government to match this across the suburban rail network in London.

The strategy sets out a number of ways in which environments for walking, cycling and public transport will be improved to make these modes more attractive and the first choice for many trips in London.

TfL recommends **no change** to the strategy in response to these comments.

### **6.3.14 Improving air quality and the environment - Reducing harmful air pollution from road transport (proposals 22-26)**

#### **Comments in support**

We received 138 supportive comments from stakeholders and businesses and 55 supportive comments from the public. Particular areas of support were:

#### **Funding/Incentives**

- Using the Mayor's Air Quality Fund to tackle pollution
- A national diesel scrappage scheme as well as other incentives to help remove older vehicles and switch to low emission vehicles sooner
- Amendment of fiscal incentives to encourage the purchase of clean vehicles

#### **ULEZ**

- Seeking to introduce the central London Ultra Low Emission Zone standards and charges in 2019
- Expanding ULEZ to outer London boroughs
- Expansion of ULEZ for HGVs by 2020

#### **Clean Technology**

- All buses to be Euro VI by 2020
- Electric or hydrogen buses

#### **Alerts/Limits**

- Measures to improve air quality at sensitive locations, e.g. schools
- Powers to restrict vehicle use when air quality limits are breached
- An alert system to inform people of air pollution episodes

#### **Comments noting concerns or opposition**

We received 43 comments of concern from stakeholders and businesses and 52 comments of concern from the public. Particular areas of concern were:

#### **Costs to users**

- The impact of road user charging schemes (e.g. ULEZ) on businesses / freight / taxi & PHV
- Introducing ULEZ in 2019
- Motorcycle charging as part of an expanded ULEZ

## **Boundary issues**

- Setting the boundary for ULEZ for non-compliant vehicles will lead to vehicles concentrating in outer London
- Implementation of ULEZ and creation of new arbitrary boundaries at edge of an expanded scheme

## **Scrappage schemes**

- Diesel scrappage scheme doesn't take into account specialist vehicles that are more expensive and only run on diesel
- Scrappage schemes may not achieve desired goals and deliver poor value for money

## **Comments making suggestions**

We received 106 comments of suggestion from stakeholders and businesses and 82 comments of suggestion from the public. Particular suggestions included:

### **ULEZ**

- ULEZ is currently unrealistic for freight to comply with due to the financial investment required and an under-developed standard
- ULEZ should be implemented as soon as possible/should have a shorter timescale for implementation
- ULEZ should be extended to the M25 / London-wide
- More preparatory work is needed with businesses (especially SMEs) for ULEZ
- Taxis should not be exempt from ULEZ

### **Targets**

- Targets for reducing bus emissions should be brought forward

### **Air Quality Monitoring**

- Information on air quality is accompanied by health advice
- Improved air quality monitoring systems across London

### **Scrappage schemes**

- Introducing a diesel scrappage scheme that does not depend on the recipient buying a new car
- Any potential scrappage scheme should be carefully targeted

- TfL should be transparent with the final destination of vehicles taken off the road by way of scrappage schemes
- Banning diesel vehicles

## **TfL response and recommendation**

### **Scrappage schemes**

Proposal 26 clear sets out the position on scrappage schemes and suggests a scrappage fund to enable cities to take the most polluting vehicles off the streets with a mobility credit offer for car drivers rather than a direct vehicle for vehicle replacement. Any scrappage scheme should be national and government led, but targeted at cities and will be supported by the Mayor and TfL.

TfL recommends **no change** to the strategy in response to these comments.

### **ULEZ / Cost to users / Boundary issues**

The proposals around bringing forward the commencement of ULEZ have been consulted on and the scheme will commence in April 2019. Consultation on tightening of London-wide LEZ standards for heavy vehicles and an expansion of the ULEZ scheme to the North / South circular for all vehicles launched in November 2017. In depth feedback on these proposals will be considered as part of the on-going engagement process around ULEZ.

TfL recommends **no change** to the strategy in response to these comments.

### **Taxis and ULEZ**

Taxis are exempt from the ULEZ as proposed, as they have new licensing requirements and an existing age limit. However, even with the ULEZ proposals there is still a requirement to further reduce emissions in order to reach compliance with the Air Quality limit values, which will require future action to reduce emissions from taxis. Whilst we are not proposing including taxis within the ULEZ at this stage, it is something that may be considered in the future, subject to a full statutory consultation.

TfL recommends **a change** to Proposal 22 to **remove** the wording 'except taxis' to allow greater flexibility for future proposals.

### **Targets**

The aims set out in the strategy have all been carefully considered in the context of London as a growing city and in light of currently available technology. Analysis that supports these aims can be found in the MTS evidence base, available online:

<http://content.tfl.gov.uk/mts-outcomes-summary-report.pdf>

<http://content.tfl.gov.uk/mts-challenges-and-opportunities-report.pdf>

TfL recommends **no change** to the strategy in response to these comments.

### **Air quality monitoring**

Air quality announcements are already coupled with health advice. A new alert system introduced by the Mayor advises vulnerable people, such as children and older people, of health risks on days of higher pollution levels as well as advice on walking and cycling in such conditions. The recent campaign to launch the T-Charge also made the clear link between poor air quality and adverse health impacts. Proposal 24 in the strategy makes reference to this. The Mayor and TfL work closely with King's College London on monitoring air quality across the city.

TfL recommends **no change** to the strategy in response to these comments.

### **6.3.15 Achieving a zero carbon city and safe levels of air quality (Policy 6 and proposals 27-30)**

#### **Comments in support**

We received 153 supportive comments from stakeholders and businesses and 439 supportive comments from the public. Particular areas of support were:

#### **Electric Vehicles**

- Proposals to encourage switching to EVs (local charging points, on street parking, financial incentives)
- Wider use of electric vehicles
- GLA and its functional bodies leading by example in terms of vehicle fleets

#### **Public Transport**

- The aim of zero carbon transport network by 2050
- Low / zero emission public transport
- Proposed measures to ensure a clean bus fleet including the roll out of electric or hydrogen buses and for zero emission buses by 2037

#### **Taxis/PHV**

- Implementing a comprehensive plan to encourage and accelerate the transition from diesel-powered to Zero Emission Capable taxis
- Measures proposed to ensure clean PHV fleet

#### **Comments noting concerns or opposition**

We received 43 comments of concern from stakeholders and businesses and 187 comments of concern from the public. Particular areas of concern were:

- A zero carbon transport network is unrealistic
- The lack of discussion in the strategy on emerging technology and alternative sustainable vehicle options

#### **Comments making suggestions**

We received 136 comments of suggestion from stakeholders and businesses and 198 comments of suggestion from the public. Particular suggestions included:

#### **Targets**

- Would like the inclusion of milestones to deliver zero carbon transport network

- The Mayor works with Local Authorities and other stakeholders to develop a roadmap for how to transition to zero carbon and adhere to ULEZ standard
- Would like the inclusion of specific targets for EV charging stations

### **Timescales**

- Requests for shorter timescales against Policy 6 – delivering a zero carbon transport network
- Requests for shorter timescales for the introduction of zero emission buses

### **Low emission taxi fleet**

- Would like to see the strategy be more ambitious on low emissions taxi fleet
- Significant infrastructure will be required to support low emission taxi fleet (parking, ranks, charging points)

### **Other**

- Suggest focusing on PM and NOX emissions as well as CO2 as a matter of urgency
- Would like to see more being done to reduce emissions

## **TfL response and recommendation**

### **Targets and timescales**

The aims and timescales set out in the strategy have all been carefully considered in the context of London as a growing city and in light of the expected development and availability of new technology. Analysis that supports these aims can be found in the MTS evidence base, available online. The strategy contains a Zero Emission Road Transport Timeline that sets out the milestones to deliver a zero carbon transport network, including targets for EV charging stations. Suggestions regarding targets and timescales have been acknowledged, in particular with regards to buses.

TfL recommends **a change to the Zero Emission Road Transport Timeline** and associated narrative to add: (a) potential earlier introduction of town centre Zero Emission Zones (2020-2030 rather than 2025-2030); (b) accelerating the call for the government to ensure that all new cars and vans sold in the UK are zero emission to 2030, which is earlier than the government's stated ambition of 2040. The MTS will also include a 2040 date for all new heavy vehicles (over 3.5 tonnes) sold to be zero emission.

TfL recommends **a change to Proposal 27 to clarify** the position on the zero emissions bus aim.

TfL recommends **no change** to the other aims as presented.

## **New technology**

The MTS remains technology neutral in relation to environmental issues. Whilst new technology will play a role in delivering improved air quality and a zero carbon city, through already emerging technology like electric vehicles, it would not be appropriate for the strategy to detail specific technologies that may rapidly become superseded. Chapter 6 and Policy 21 provide more detail on the approach to new technology across the transport system.

TfL recommends **no change** to the strategy in response to these comments.

## **Other**

The strategy seeks to address emissions relating to PM and NO<sub>x</sub> through policies 5 and 6, and this is also set out in the vision and aims at the start of the strategy. An initial consultation on bringing forward the implementation date of ULEZ has already been held with the scheme due to launch in April 2019. The Mayor has also launched the T-Charge, a £10 charge on top of the Congestion Charge for the most polluting vehicles operating in the existing Congestion Charge zone. The strategy sets out an overall, ambitious, vision for reducing emissions and, coupled with the Mayor's London Environment Strategy, represents a step change in improving air quality and the environment in London.

TfL recommends **no change** to the strategy in response to these comments.

## **Low emission taxi fleet**

Under TfL's current licensing requirements London's entire taxi fleet will become zero emission capable by 2033 at the very latest. Proposal 28 states that the Mayor will work to develop a comprehensive plan to encourage and accelerate the introduction of Zero Emission Capable taxis, which will include provision of the required infrastructure to support this transition. TfL will deliver 300 rapid charge points across London by 2020, with a high proportion for exclusive taxi use. Proposal 28 includes a stretching objective to reach a minimum of 9,000 ZEC taxis by 2020.

TfL recommends **no change** to the strategy in response to these comments.



### **6.3.16 Improving air quality and the environment - Zero emission private and commercial vehicles (proposals 31-40)**

#### **Comments in support**

We received 130 supportive comments from stakeholders and businesses and 3 supportive comments from the public. There was wide support for proposed measures to minimise the impact of transport services on the environment and to reduce London's overall emissions. Particular areas of support were for:

#### **Infrastructure/Technology**

- The wider use of electric vehicles and policies to encourage switching to EVs
- The measures to support transition to ULEVs
- The measures to provide sufficient and appropriate charging and refuelling infrastructure to EVs
- Zero emission zones
- The proposal to accelerate development & uptake of technologies to tackle tyre and brake wear
- The measures to increase low-carbon generation (including on TfL land and for supply to its assets)
- Compliance with Non-Road Mobile Machinery standards for TLRN construction and maintenance activities

#### **River / Airports**

- The strategy's opposition to Heathrow expansion
- Monitoring and implementing measures to limit emissions from river vessels
- The publication of an emissions strategy of the River Thames

#### **Other**

- Further research into health risks of particulate matter on Underground network

#### **Comments noting concerns or opposition**

We received 29 comments of concern from stakeholders and businesses and 28 comments of concern from the public. Particular areas of concern were:

- Lack of EV charging infrastructure on-street and the impact this will have on the transition to EV use
- Poor air quality on the Underground

## **Comments making suggestions**

We received 132 comments of suggestion from stakeholders and businesses and 17 comments of suggestion from the public. Key suggestions included:

### **Infrastructure**

- Coordinating discussions with the GLA, local authorities and charge point installers to increase and manage EV infrastructure
- Major investment is needed in EV charging infrastructure
- Specific targets should be set for EV charging stations
- Investment in hydrogen refuelling infrastructure
- The wider rail network will need to be electrified

### **TfL response and recommendation**

The Mayor, through TfL, is seeking to create conditions to encourage greater private investment in EV charging infrastructure, with a particular focus on delivery through the Go Ultra Low City scheme and on introducing more rapid charging points.

**TfL recommends no change to the strategy in response to these comments.**

The GLA and TfL are working with stakeholders to forecast appropriate levels of EV charging infrastructure to support the ambitious aims set out in the MTS and to support the transition to ULEVs. The draft London Plan also includes a requirement for any parking provision in new residential developments to support EVs or other ULEVs.

**TfL recommends no change to the strategy in response to these comments.**

The MTS calls for greater electrification of the rail network, but this is not within the remit of TfL to deliver. The Mayor and TfL will continue to lobby central government and work with Network Rail to introduce more electrification across the rail network in London.

**TfL recommends a change to the narrative to clarify that by 2050, all rail lines in London should be electrified and all trains hauled by zero emission motive-power within London.**

The strategy contains a Zero Emission Road Transport Timeline that sets out the milestones to deliver a zero carbon transport network, including targets for EV charging stations.

**TfL recommends no change to the strategy in response to these comments.**

The 'Focus On: Reducing Emissions from Non-Road Transport Sources' covers issues relating to poor air quality on the Underground network. Proposal 40 sets out plans to undertake further research into the health risks of particulate matter on the

London Underground network and take appropriate measures to mitigate the adverse effects of any risks found where practicable.

TfL recommends **no change** to the strategy in response to these comments.

The Mayor continues to support hydrogen refuelling through the Hydrogen London partnership. As set out in the Roadmap to Zero Emission Road Transport diagram, at least 15 hydrogen refuelling stations will be installed in and around London by 2020.

TfL recommends **no change** to the strategy in response to these comments.

### **6.3.17 Improving air quality and the environment - Natural and built environment and climate change resilience (Policy 7 and proposals 41-43)**

#### **Comments in support**

We received 139 supportive comments from stakeholders and businesses and 186 supportive comments from the public. Particular areas of support were:

- The protection of existing and provision of new green infrastructure
- Additional tree planting and green infrastructure
- The implementation of sustainable infrastructure drainage
- The protection, promotion and enhancement of London's built heritage and cultural importance

#### **Comments noting concerns or opposition**

We received 21 comments of concern from stakeholders and businesses and 10 comments of concern from the public. Particular areas of concern were a perceived weakness in Policy 7 and its deliverability with suggestions the wording is amended to strengthen the policy.

#### **Comments making suggestions**

We received 71 comments of suggestion from stakeholders and businesses and 29 comments of suggestion from the public.

There were a number of specific plant and tree varieties suggested that can reduce pollution and enhance the natural environment.

#### **TfL response and recommendation**

Concern around the wording used in Policy 7 has been acknowledged.

**TfL recommends a change to Policy 7 to clarify and add more detail to the policy.**

The suggestion around different plant and tree varieties and their impact on reducing pollution has been acknowledged. TfL regularly reviews the type and variety of trees planted across its own network. Boroughs are responsible for such decisions in their local area.

**TfL recommends no change to the strategy in response to these comments.**

### **6.3.18 Improving Air Quality and the environment - Natural and built environment and climate change resilience and transport noise and vibration (Policy 8 and proposals 44-47)**

#### **Comments in support**

We received 72 supportive comments from stakeholders and businesses and 2 supportive comments from the public. Particular areas of support were:

- The programme of measures to protect new and existing transport infrastructure from severe weather and climate change
- Researching the effects of extreme weather on the transport network
- Reducing the number of Londoners exposed to excessive noise and vibration levels from road transport
- Reducing noise pollution from public transport in particular for the mitigation of noise pollution and vibration from rail services

#### **Comments noting concerns or opposition**

We received 17 comments of concern from stakeholders and businesses and 49 comments of concern from the public. There was concern that TfL does not give enough priority to Policy 8. A particular area of concern was air and noise pollution from refrigerated lorries.

#### **Comments making suggestions**

We received 89 comments of suggestion from stakeholders and businesses and 90 comments of suggestion from the public. Key suggestions included:

- The strategy should do more to address noise pollution, especially at night
- A commitment to setting a maximum noise standard addressing poorly maintained or modified vehicles and calls for working with DfT and authorities on detection of illegally noisy aftermarket or modified exhausts
- Noise pollution from certain vehicles types must be addressed (e.g. motorcycles, sports cars including in-vehicle sound systems)
- The strategy should do more to address noise pollution / noise pollution should be considered equally important as air pollution
- Underground trains should be included in Proposal 47 on noise and vibration from rail services
- The Mayor should take a stronger position on pollution from aircraft

## **TfL response and recommendation**

It is acknowledged that there are issues relating to refrigerated lorries. Measures to address this will be part of TfL's wider work for achieving a zero emission transport network, delivered through Proposals 30, 31, 32 and 46.

**TfL recommends no change to the strategy in response to these comments.**

The strategy has a two-page 'Focus On' section covering noise and vibration. Proposals 46 and 47 set out plans for improvements in this area. The Mayor's London Environment Strategy also includes an extensive section tackling noise pollution across the city. It is therefore felt that adequate attention has been given to issues relating to noise pollution and vibration.

**TfL recommends no change to the strategy in response to these comments.**

Addressing noise pollution from poorly maintained, modified (including aftermarket or modified exhausts) and specific vehicle types, is addressed in Proposal 46.

**TfL recommends no change to the strategy in response to these comments.**

Underground trains are already included in Proposal 47 on noise and vibration from rail services. The London Underground is classified as a rail service. It is acknowledged that the Proposal could be clearer on this point.

**TfL recommends a change to the strategy to clarify that Underground trains are covered under Proposal 47.**

Aircraft pollution and emissions is beyond the control of the Mayor and the scope of the MTS. However, in Chapter 5 of the strategy on New Homes and Jobs, the Mayor sets out his opposition to any further expansion of Heathrow airport on the grounds of the negative impact it will have on residents across the city.

**TfL recommends no change to the strategy in response to these comments.**

## 6.4 A good public transport experience

### 6.4.1 The whole journey (Policy 9 and proposal 48)

#### Comments in support

We received 66 supportive comments from stakeholders and businesses. Responses were generally supportive of this policy and proposal. Particular areas of support were:

- Using the Healthy Streets Approach to transform the design of street space and transport facilities around stations to enable a better integrated, attractive whole journey experience and facilitate mode shift from the car
- Focussing on creating safer and more secure gateways to public transport

#### Comments noting concerns or opposition

We received 15 comments of concern from stakeholders and businesses. Particular area of concern was the distribution of improvements:

- Improvements might not be fairly distributed across London and would reinforce social inequalities by servicing those living in richer areas first

#### Comments making suggestions

There were no substantial suggestions made for this policy and proposal.

#### TfL response and recommendation

##### **Distribution of improvements**

The ambitious aim of achieving 80 per cent mode share for walking, cycling and public transport will require action across all parts of London. Policy 9 and Proposal 48 apply to all modes and all levels of intervention.

[TfL recommends a change to Policy 9, Proposal 48 and the narrative to clarify these points.](#)

## **6.4.2 Improving affordability and customer service - Making public transport affordable (Policy 10 and proposal 49)**

### **Comments in support**

We received 114 supportive comments from stakeholders and businesses and 492 supportive comments from the public. There was general support for plans to make public transport more affordable with respondents noting that affordability is a core part of an attractive and fair public transport system that serves all Londoners.

Particular areas of support were:

- Providing affordable fares, including the fares freeze, as a means to reducing car reliance
- Introducing the Hopper fare and its planned expansion

### **Comments noting concerns or opposition**

We received 36 comments of concern from stakeholders and businesses and 328 comments of concern from the public. Particular areas of concern were:

- Rising fares and the impacts on Londoners; particularly lower-income families who are often driven further away from the centre where there are fewer, and often more costly, transport options
- The existing cost of public transport, even with the fares freeze

### **Comments making suggestions**

We received 72 comments of suggestion from stakeholders and businesses and 215 comments of suggestion from the public. Key suggestions included:

#### **Rising fares and existing cost of transport**

- Reduce rather than freeze fares
- Make public transport fares free

#### **Cost effectiveness**

- Improve cost effectiveness and value for money of public transport

#### **Integration of fares**

- Improve integration of fares across modes
- Hopper fares should apply between different modes (e.g. from train to Underground)



## Part-time fares

- Measures should be considered to ensure that part-time and low-income workers are taken into account as part of the fares structure, e.g. more flexible season tickets taking into account the travel patterns of part-time workers

## TfL response and recommendation

### Rising fares and existing cost of transport

An affordable fares system, both now and in the future, is essential to encouraging a shift from car to public transport. TfL has implemented the Mayor's fares freeze on its own services, and TfL's latest business plan protects all TfL travel concessions, with free or discounted travel for children, people aged over 60, those on income support and disabled people.

In the longer-term, ensuring affordable fares will be challenging in the context of TfL having to absorb an average £700m per year cut in Government funding over five years, with the general grant to support operating costs removed from 2018/19. Policy 10 sets out the strategic ambition to ensure public transport fare levels are set to enable access to affordable travel for all Londoners in this context. This will need to be balanced against the need for investment to ensure London's transport system is safe, efficient and fit for purpose.

The strategy sets out plans to improve public transport links and provide a better walking and cycling environment for London's less well-connected areas (e.g. by adjusting bus service volumes, redistributing resource from central to inner and outer London). This will ensure there are viable, sustainable, and affordable travel choices available to residents across all parts of the city.

[TfL recommends no change to the strategy in response to these comments.](#)

### Cost effectiveness

TfL is implementing a comprehensive cost reduction programme which will transform the organisation and ensure it can deliver a freeze on fares despite the £2.8bn reduction in our grant from Government over the period. Continued cost effectiveness will be critical as London becomes one of the only major cities in the world with a public transport and road network that doesn't receive Government subsidy to support the operating costs. Issues relating to funding the strategy are addressed in Chapter 6.

[TfL recommends no change to the strategy in response to these comments.](#)

### Integration of fares

The Hopper fare has now been introduced, meaning that customers can make unlimited bus or tram transfers within the hour, even if other trips on Oyster modes are made in between. When interchanging between TfL and TOC rail services, the fare charged is a single pay as you go (PAYG) through-fare, which is less than the

sum of the equivalent TfL and TOC single PAYG fares. Daily fare caps will continue to apply to all multi-modal trips.

The MTS recognises that not all rail services are under TfL control. Proposal 49 states that Government will be lobbied to match TfL's fares freeze on those services which are not devolved to TfL control.

TfL recommends **no change** to the strategy in response to these comments.

### **Part-time fares**

Since 2015 TfL's PAYG daily Travelcard caps have been set at 20 per cent of the price of the equivalent 7 Day Travelcard. This means that part-time workers pay at most the same daily rate as a full time worker using a weekly ticket to travel on 5 days. Weekly capping on Contactless, which is also due to be implemented on Oyster by the end of 2018, means customers no longer need to predict their weekly travel pattern in order to choose the best value ticket for the week.

TfL recommends **no change** to the strategy in response to these comments.

### **6.4.3 Improving affordability and customer service - Enhancing customer service (Policy 11 and proposal 50)**

#### **Comments in support**

We received 81 supportive comments from stakeholders and businesses and 96 supportive comments from the public. Responses were generally supportive of plans to enhance customer service and make the public transport network easier and more pleasant to use across TfL and other transport operators. Particular areas of support were:

- Commitment to provide a comfortable experience
- Improving real-time journey information
- Improving staff training, including the training of bus drivers
- Improving mobile phone coverage on the Underground

#### **Comments noting concerns or opposition**

We received 43 comments of concern from stakeholders and businesses and 333 comments of concern from the public. Particular areas of concern were:

##### **General principles**

- Cleanliness, comfort and facilities on public transport services

##### **Efficiency savings and staffing**

- Tension between improving customer service and making efficiency savings (e.g. staff cut backs)

##### **Staff training**

- Lack of specified future actions to continuously train staff, particularly with regard to those with accessibility needs

#### **Comments making suggestions**

We received 148 comments of suggestion from stakeholders and businesses and 874 comments of suggestion from the public. At a general level, respondents raised:

##### **General principles**

- The importance of getting the basics right (i.e. cleanliness, ambient temperature and air conditioning and improved comfort) as these failures undermine trust in the Mayor's ability to deliver better services and more ambitious plans in the future

- The importance of investment in, and utilisation of, technology to aid journey planning, including improved live information, digital maps, route suggestions (including to those with accessibility needs)
- The importance of face-to-face contact in providing good customer service

More specific suggestions included:

### **Efficiency savings and staffing**

- Providing more staff on public transport

### **Staff training**

- Improving staff training, including bus drivers, to improve customer service, particularly with regard to accessibility issues

### **Toilets**

- Provide more public toilet facilities on the public transport network

### **4G & WiFi**

- Provide mobile data and WiFi on all public transport

### **Information**

- Provide live journey time information at bus stops

### **Safety and security**

- Improving safety on public transport and at stations and a focus on reducing anti-social behaviour and the impact it has on journey experience

### **Other issues**

- Doing more to prevent strikes on rail services

## **TfL response and recommendation**

### **General principles**

The MTS sets out the strategic approach to getting the basics right, investing in technology and providing face-to-face contact in Proposal 50.

[TfL recommends no change to the strategy in response to these comments.](#)

### **Efficiency savings and staffing**

The importance of having well-trained staff is emphasised in Proposal 50a which sets out plans to improve staff training, including for bus drivers.

Following a review by London TravelWatch into the customer impacts of ticket office closures, TfL has implemented a number of changes, including recruiting an

additional 325 staff into stations, trialling new focal points to ensure passengers know where they can reach staff, and rolling out high-visibility tabards to help passengers find staff in ticket halls more easily.

On the Overground network, Arriva Rail London is incorporating lessons learned from the review of Tube ticket office closures into the London Overground programme.

Issues relating to funding the strategy are addressed in Chapter 6.

TfL recommends **no change** to the strategy in response to these comments.

### **Staff training**

The strategy recognises the importance of staff training in delivering a good public transport experience, and this is highlighted in Proposal 50.

TfL recommends **a change** to the Accessibility Implementation Plan (Figure 17) to **clarify** that staff training will continue over the lifetime of the strategy.

### **Toilets**

The provision of public toilets across London is addressed in the draft London Plan. The provision of toilets can be considered when planning and designing new infrastructure.

TfL recommends **no change** to the strategy in response to these comments.

### **4G & WiFi**

Building on the improvements in communication technology for the emergency services, 4G mobile communications will be provided on the Underground. This gives an opportunity to provide public cellular services.

Wi-Fi on buses in London has been trialled several times, most recently in 2016. Transport for London is open to Wi-Fi being installed on London buses if a third party were to fund it or a commercial model concession / operator could be found to provide a cost neutral / revenue share service model for TfL and its passengers. TfL continues to meet with potential partners to discuss these options but, to date, have not found a commercial partner to take the proposition further.

TfL recommends **a change** to the narrative about 4G and Wi-Fi to **clarify** key deliverables.

### **Information at bus stops**

In 2011, TfL completed the roll-out of 2500 bus-shelter signs as part of the TfL Funded "Countdown II" project. Since that time, there has been no further funding available within the TfL Business plan. Therefore TfL have 'productised' the Countdown signs and offered a service to all London boroughs where they can purchase Countdown signs using whatever third-party funding is available. To date

14 boroughs have purchased 86 signs using independent or S106 funds. This service has been widely publicised and remains available.

Proposals 50 and 55 outline how TfL will continue to provide real-time data to passengers and staff across all modes.

TfL recommends **no change** to the strategy in response to these comments.

### **Safety and security**

Safety and security on the public transport network is partly covered in the context of personal safety / security under Policy 3 and Proposals 12 and 14. The issue of anti-social behaviour has been acknowledged in the strategy, particularly in the context of night-time services. Safety on the public transport network has not been covered explicitly.

TfL recommends **a change** to the narrative **to add** a new section at the beginning of Chapter 4a, and renaming Chapter 4a to *Improving safety, affordability and customer service* to address this point.

TfL recommends **a change to add a new policy** within this new section to set out how the Mayor, through TfL and with other public transport operators, will work to eliminate deaths and serious injuries from London's rail, Tube, London Overground, DLR, tram, Dial-a-Ride, river and cable car services.

### **Industrial disputes**

There is a Mayoral manifesto pledge to reduce the number of days lost to strike action, by maintaining better industrial relations. TfL will continue to engage with relevant parties as appropriate.

TfL recommends **no change** to the strategy in response to these comments.

## **6.4.4 Improving public transport accessibility (Policy 12 and proposals 51-52)**

### **Comments in support**

We received 126 supportive comments from stakeholders and businesses and 298 supportive comments from the public. Responses were generally supportive of plans to improve the overall accessibility of London's streets and public transport.

Particular areas of support were:

- Improving accessibility of public transport for people with mobility issues
- Improving the culture of accessibility for all users
- Improving accessibility at transport interchanges
- Delivering step-free upgrades at Underground stations
- Providing staff and facilities to help wheelchair users board trains
- Measures to improve frequency of public transport services more generally

### **Comments noting concerns or opposition**

We received 106 comments of concern from stakeholders and businesses and 247 comments of concern from the public. Particular areas of concern were:

#### **Hidden disabilities**

- Insufficient focus given to providing improvements that cater for those with hidden disabilities, such as sensory disabilities, mental health issues or learning disabilities

#### **Different needs**

- Lack of focus on the needs of disabled passengers
  - Public transport is not adapted for mobility impaired users
- Public transport is not a universally appropriate mode of travel for certain groups such as, disabled people, elderly passengers, and those travelling with young families

#### **Step-free access**

- Proposed step-free upgrades are moving too slowly and targets lack sufficient detail
- A turn-up-and-go service for wheelchair users is not achievable without a more holistic (whole network) commitment to accessibility

## **Comments making suggestions**

We received 261 comments of suggestion from stakeholders and businesses and 484 comments of suggestion from the public. Key suggestions included:

### **Hidden disabilities**

- Provide more focus on non-physical barriers to improve access for those with sensory/cognitive impairments, including mental health issues, dementia and learning disabilities

### **Different needs**

- Broaden the definition of accessibility to include users with temporary access needs, such as travelling with a buggy and shopping
- Review bus layout to improve spaces for buggies and wheelchair users as well as those with temporary access needs, such as those travelling with shopping
- Ensure better placement of bus stops for accessibility by disabled and elderly users
- Provide more focus on community transport
- Provide more parking near public transport facilities to improve access

### **Step-free access**

- Ensure the whole network is accessible with a greater focus on ensuring all stations have step free access, including those in outer London
- Bring step-free access targets forward
- Improve operation of existing services and provide more investment in public transport infrastructure

## **TfL response and recommendation**

### **Hidden disabilities**

The strategy sets out to improve travel in London for all users by making it easier, safer and more convenient to use. A fundamental element of this is inclusive design, which, along with other specifically highlighted improvements, will make the network more accessible and inclusive.

TfL recommends **a change** to the narrative throughout the section **to clarify** the need to consider all users, including those with both visible and invisible disabilities.

TfL recommends **a change** to the narrative **to add** more detail highlighting the variety of barriers that can be faced by different disabled people.



TfL recommends **a change to Proposal 52 to clarify** that inclusive design will give consideration to those with both visible and invisible disabilities.

### **Different needs**

Making travel across all modes easier is a key objective of the strategy in order to achieve the modal shift target, with the network needing to improve and take greater account of the wide variety of current and potential users. Disabled people currently travel less than the wider population for a number of reasons, and tackling the barriers that are faced to using public transport will be an important part of addressing this. When discussing accessibility and inclusivity we also include those, for example, with luggage or a pushchair, who will also benefit from the measures.

TfL recommends **a change to add** a new section to the narrative entitled *Enabling spontaneous and independent travel* to highlight the ways in which different needs are addressed on the transport system.

TfL recommends **a change to add a new proposal** within this new section, incorporating the elements of Proposal 52a/d/f relating to service and information provision, and including reference to seeking to act on feedback from disabled and older Londoners regarding public transport services.

TfL recommends **a change to Proposal 51** is recommended **to add** references to:

- Working with operators to ensure they are meeting their requirements for the level of service that their drivers provide;
- Reviewing existing bus design
- Ensuring that all new and amended bus stops will be, as a minimum, wheelchair accessible.

TfL recommends **a change to proposal 52 to move** elements of Proposal 52a/d/f to the new proposal as described above.

TfL recommends **no change** to any text specifically with regard to bus stop location as the principles of inclusive design address this, while there may be greater opportunity to discuss in greater detail within other documents.

TfL recommends **a change to add** to the narrative in the Social Needs Transport section to reflect the wider work that Assisted Transport Services undertake, and how the road map to improve services will benefit users, and **a new proposal** to set out the principles for the delivery of ATS.

### **Step-free access**

Delivery of an improved step-free network will provide a larger range of travel options for all users and so forms a key part of the strategy and achieving the required level of mode shift. While these improvements to the network are crucial, it is also essential that they are complemented by a wider package of accessible and inclusive measures to truly provide stations with an inclusive design. It is also

important that investment continues in stations outside of our control to ensure that London is more accessible by rail.

It is not proposed to change any text with regard to step-free access (SFA) delivery timescales due to a number of factors:

- Delivery assumptions being made on similar budget basis over the funding periods
- That stations will become bigger and more time consuming to deliver
- The need to undertake feasibility, viability and deliverability work to better understand implementation timescales

As highlighted previously, new text has been proposed to take account of providing wider accessibility measures to support elements such as 'turn-up-and-go' by making the wider network more accessible and inclusive.

TfL recommends **a change to Proposal 52 to clarify** that step-free access will be provided at further national rail stations and **add** reference to Victoria Coach Station's potential replacement.

TfL recommends **a change** to the narrative **to clarify** the context and challenge of reducing the journey time differential between the step-free network and the non-step-free network.

TfL recommends **a change to Policy 12 to add** reference to reducing journey times for disabled and older users.

Concerns that a turn-up-and-go service for wheelchair users is not achievable without a more holistic (whole network) commitment to accessibility are noted.

TfL recommends **a change** to the narrative in the *whole journey* section of Chapter 4 **to clarify** that the needs for accessible drop-off and pick-up locations for those with limited mobility will be a consideration when designing stops and stations and **a change** to the narrative in the *Enhancing customer service* section of Chapter 4 **to clarify** that inconsistent levels of service across the network can prevent some people from being able to travel.

### **Accessibility Implementation Plan**

TfL recommends **a change** to the Accessibility Implementation Plan to reflect the changes to policies and proposals outlined in this report, and **to clarify** that programmes will continue to be delivered over the duration of the strategy.

## **6.4.5 Shaping and growing the bus network (Policy 13 and proposals 53-54)**

### **Comments in support**

We received 119 supportive comments from stakeholders and businesses and 132 supportive comments from the public. Particular areas of support were:

#### **Bus service planning**

- Expanding the bus network, including more and improved local bus routes
- Transforming of bus services to make them more reliable, accessible, comfortable and convenient to reduce car use
- Adjusting bus service volumes to match demand, including improved and increased bus services in outer London

#### **Bus speeds/reliability**

- Delivering bus priority measures to improve bus journey times and reliability
- Commitment to reduce the number of times streets have to be dug up to limit disruption

### **Comments noting concerns or opposition**

We received 87 comments of concern from stakeholders and businesses and 170 comments of concern from the public. Particular areas of concern were:

#### **Bus service planning – Future planning of the bus network**

- Impact of adjusting bus service volumes
  - Reductions may decrease the usefulness of the network and encourage car use
- Lack of detail on future plans for the bus network
- Many buses are currently empty or sparsely used

#### **Bus speeds/reliability**

- Falling speeds caused by congestion and roadworks
- Congestion affecting bus reliability
- Volume of buses on the road network
- The tension between bus priority and its negative impact on road congestion
  - Increase in bus-only lanes and extended bus lane operating hours could have a negative impact on congestion for other road users

- Bus priority proposals are too radially focussed

### **Comments making suggestions**

We received 213 comments of suggestion from stakeholders and businesses and 621 comments of suggestion from the public. At a general level, respondents suggested that more is needed on buses and bus priority and that policies and proposals should be strengthened. Particular suggestions included:

#### **Bus service planning – Future planning of the bus network**

- Improve orbital routes (both volume of them and their journey time reliability)
- Redistribute bus services from central and inner London to outer London as outer London bus services are more important for making orbital journeys
- Give consideration to bus services that operate across the London boundary (Links/fares policy) and encourage collaborative working with other authorities
- Provide more express bus routes
- Terminate more bus routes at hospitals
- Improve the frequency of buses
- Extend more routes
- Commit to providing suburban bus services
- Introduce more on-demand bus services

#### **Bus speeds/reliability**

- Improve bus priority on orbital routes
- Introduce more segregated bus lanes

### **TfL response and recommendation**

#### **Bus service planning - Future planning of the bus network**

The bus network has been carefully developed over the past decades to accommodate changing travel demands. Compared to the rail network, the bus network is relatively flexible with shorter lead-in times and less expensive fixed infrastructure. The strategy sets out the principles which will form the basis of bus planning, but in a long-term strategy it is not appropriate to specify the bus network in detail. This can be developed gradually as London grows, new rail infrastructure and upgrades are delivered, and travel patterns evolve. In the case of cross-boundary services, Policy 16 sets out that regional and national public transport schemes should be integrated into London's public transport system wherever practical.

TfL recommends **a change to Proposal 53** and the narrative **to add** more detail on the principles underlying bus network planning now and in the future. The narrative should include references to how adjusting bus service volumes in different parts of London would work in practice, and the circumstances under which express services could be considered.

TfL recommends **a change** to Figure 19 **to add** more detail on elements of bus service planning (including orbital and express service concepts) alongside bus priority measures.

Proposal 87 and Proposal 99 address demand responsive transport.

TfL recommends **no further change** to the strategy in response to these comments.

### **Bus speed/reliability - Impact of congestion on the bus network and allocation of street space**

Concerns relating to congestion, its impact on bus speeds / reliability, and competition for road space are noted. The Healthy Streets Approach puts people at the centre of transport planning decisions. Buses have a vital role to play in delivering Healthy Streets as a good quality bus service can attract new users if it is seen as a viable alternative to the car. However, the greatest threat to bus journey times and reliability is from road congestion. It is therefore essential that buses are given priority where needed.

TfL recommends **a change to add a new proposal** under the heading *Improving bus journey times and reliability* to describe how bus passengers will be put at the heart of street network design, and how the bus network will be protected from congestion.

TfL recommends **a change** to the narrative in chapter 3 **to clarify** that the allocation of street space will vary in different places and at different times as appropriate for the delivery of the policies and proposals of the strategy.

### **Bus speeds/reliability - Bus priority**

The strategy sets out plans to provide more bus priority. This could take the form of segregated bus lanes, but the most appropriate form of bus priority would be considered on a case-by-case basis.

Concerns and suggestions relating to bus priority on non-radial routes are noted.

TfL recommends **a change to Proposal 54 to add** more detail on how bus priority would look in different parts of London. This should include reference to orbital services.

## **6.4.6 Improving rail services and tackling crowding – Growth and crowding on radial services to central London (Policy 14 and proposals 55-59)**

### **Comments in support**

We received 184 supportive comments from stakeholders and businesses and 351 supportive comments from the public. There was general support for the policy to transform rail-based services to provide safer, modern, reliable, integrated, accessible and user-friendly services. Particular areas of support were:

- Increasing capacity on rail services
- Reducing journey times
- Reducing overcrowding
- Providing real-time data, information and visualisations to improve the communication of overcrowding and congestion
- Delivering Crossrail 2 by 2033
- Opening the Elizabeth Line in 2019 and increasing its frequency as required.
- Investing in the Tube network to improve capacity and reliability

### **Comments noting concerns or opposition**

We received 146 comments of concern from stakeholders and businesses and 459 comments of concern from the public. Particular areas of concern were:

#### **Crowding and its impact on the public transport system as a whole**

- Overcrowding on rail services, particularly the Tube and whether the plans in the strategy would improve this
- Population growth and the provision of public transport capacity to accommodate this
- Plans for the Elizabeth Line, Crossrail 2 and HS2 would not reduce crowding and improve connectivity for all Londoners – only some areas/users will benefit
- Other public transport services and stations may not be able to manage the additional demand brought into the system by the Elizabeth Line

#### **National Rail investment**

- The strategy does not address the issue of the reliability of trains

## **Comments making suggestions**

We received 219 comments of suggestion from stakeholders and businesses and 719 comments of suggestion from the public. Key suggestions included:

### **Crowding and its impact on the public transport system as a whole**

- Provide more ambitious, universal plans to tackle crowding across London
- Increase capacity of rail services
- Improve station capacity
- Build more Tube stations and lines

### **National Rail investment**

- Set out a strategy to achieve further rail investment
- Reduce journey times on National Rail
- Provide more express rail services from outer to central London
- Modernise the rail fleet

### **Maintenance of existing assets**

- Increase investment in public transport infrastructure, including in maintenance of existing transport and assets

### **Other issues**

- Allow bicycles on trains

## **TfL response and recommendation**

### **Crowding and its impact on the public transport system as a whole**

The MTS sets out an ambitious plan to tackle crowding on London's rail services (including National Rail, Tube, DLR and Tram). TfL shares the view of respondents that crowding is a concern, and this is reflected in Policy 14 which states that an increase in capacity of at least 80 per cent by 2041 should be sought in order to tackle crowding as well as facilitate mode shift to rail.

[TfL recommends a change to the narrative relating to Crossrail 2 to add reference to the importance of high capacity interchange to gain the full benefit of the scheme.](#)

Station capacity more generally is addressed by Proposal 67 (station capacity improvements). This proposal addresses the point that increased capacity of train services must be accompanied by improved station capacity to avoid bottlenecks developing.

All Londoners will benefit from these measures through reduced traffic dominance, better air quality and a better overall public transport experience citywide.

## **National Rail investment**

Concerns and suggestions relating to capacity, reliability, service patterns, journey times and long-term investment on the national rail network in London are noted.

TfL recommends **a change to Proposal 59** and the narrative **to add** more detail on national rail priorities and the importance of the national rail network in delivering the aims of the strategy.

## **Maintenance of existing assets**

Suggestions relating to investing in existing assets are noted. This is broadly reflected in the approach to rail as set out in the strategy, which aims to make the most of existing assets through line upgrades, new rolling-stock and station capacity schemes. Policy 14 makes clear that a reliable rail service is needed. Effective maintenance of existing assets will be essential to this.

TfL recommends **no change** to the strategy in response to these comments.

## **Other issues**

Allowing bicycles on trains relates to conditions of carriage for individual operators and is dependent on rolling stock and operational constraints. TfL recognises the great potential that exists for shift to multi-modal trips, as a contribution to meeting the MTS mode share aim, and strongly encourages measures to encourage cycling to and from stations. For instance, TfL's conditions of carriage allows folded bicycles to be brought on TfL services. Enabling multi-modal trips involves a combination of better cycle parking facilities and the ability to carry cycles on trains – we encourage train and station operators to aim for an appropriately balanced provision that allows people to make choices that help us meet MTS aims. Where space for cycle parking is constrained, train operators should promote and enable carriage of cycles on trains, including that platform lifts at stations meet the minimum recommended lift sizes published in the London Cycling Design Standards. The principle of enabling multi-modal trips by public transport, walking and cycling is supported by Policy 9 and Proposal 48.

TfL recommends **a change to Proposal 48 to clarify** that actions will include the provision of high quality cycle facilities at stops and stations.



## **6.4.7 Improving rail services and tackling crowding – Rail services to enable mode shift from car in inner and outer London (Proposals 60-67)**

### **Comments in support**

We received 126 supportive comments from stakeholders and businesses and 169 supportive comments from the public. Particular areas of support were:

#### **Suburban rail, interchange and orbital links**

- Devolving suburban rail services to TfL control (a minority of respondents expressed opposition / concern)
- Creating a London Suburban metro
- Improving public transport in outer London and between suburbs
- Developing mini-radial transport interchange hubs, integrating inner / outer London rail services
- Improving station capacity

#### **Rail freight**

- Improving rail freight connectivity and capacity
- Upgrading rail freight routes outside London to reduce congestion in London to free up capacity for passenger services

#### **Tram/DLR**

- Upgrading the DLR to increase capacity

### **Comments noting concerns or opposition**

We received 58 comments of concern from stakeholders and businesses and 93 comments of concern from the public. Particular areas of concern were:

#### **Suburban rail, interchange and orbital links**

- Lack of solutions for delivering orbital links across all areas of London
  - The strategy does not address lack of transport links in the south and south east London
- Concern about devolution of rail services to TfL

#### **Rail freight**

- The strategy does not address rail freight sufficiently / portrays it negatively

## Tram/DLR

- Ambition for trams is not high enough and targets are too long term / low

## Comments making suggestions

We received 103 comments of suggestion from stakeholders and businesses and 263 comments of suggestion from the public. Key suggestions included:

### **Suburban rail, interchange and orbital links**

- Expand the rail network in south London
- Make a stronger commitment on delivering services on the West London Orbital line
- Provide more on the importance of interchanges and how these can be improved

### **Rail freight**

- Strike a more positive tone on rail freight e.g. better engagement

## Tram/DLR

- Upgrade existing tram services
- Extend the existing tram network
- Make the Sutton tram extension a proposal in its own right

## TfL response and recommendation

### **Rail devolution**

A minority of respondents expressed opposition or concern relating to rail devolution. This is noted. TfL has proven what can be delivered from rail devolution – more frequent trains, fewer cancellations and delays, more staff on stations and more affordable fares. There is a very strong business case for devolving local stopping services to TfL: <http://content.tfl.gov.uk/rail-devolution-business-case-narrative.pdf>. The MTS already states that passengers using longer-distance services would be unaffected in terms of fares, train stopping patterns or relative priority of services.

TfL recommends **no change** to the strategy in response to these comments.

### **Suburban rail, interchange and orbital links**

High quality interchange is critical to improving journey times by public transport between destinations in inner and outer London. Proposal 62 sets out plans to improve these facilities and associated services.

TfL recommends **a change** to the narrative to **clarify** in more detail the interventions required to achieve this.

The suggestion to make a stronger commitment on delivering services on the West London Orbital Line is noted. TfL is supportive of this.

TfL recommends **a change to Proposal 83** (West London Orbital line), associated narrative, and Figure 41 **to clarify** this.

Links in south and south east London will be addressed by the creation of a London Suburban metro (Proposal 60), improving interchange at Lewisham (Proposal 62) and improving tram services (Proposal 65).

TfL recommends **no further changes** beyond those described above.

## Rail freight

Concerns relating to the portrayal of rail freight are noted. The value of rail freight is recognised, but careful planning is needed to make best use of rail capacity for everyone. This can be achieved by the following principles:

- Moving freight at quieter times of day when demand for passenger services is much lower
- Supporting projects that allow more freight to run on routes bypassing London, where more capacity is available and the demand for passenger services is much lower

Achieving this will require close working with Network Rail.

TfL recommends **a change** to the narrative of the strategy **to add** these principles to a new 'focus box; on making the most of London's rail network for freight and passengers, within the *Efficiency of deliveries and servicing* section of Chapter 3.

TfL recommends **a change to move Proposal 64** to this new focus box, and **a change to clarify** the importance of working with Network Rail and make clear that both passenger services and London-bound freight services would be beneficiaries when rail paths within London are freed following upgrades to rail freight routes outside London.

TfL recommends **a change to add** a new section to the narrative on improving efficiency of freight networks within the *Efficiency of deliveries and servicing* section of Chapter 3, including a description of how the rail freight network can support the broader aims of the strategy.

TfL recommends **a change to add a new proposal** within this new section to outline how the Mayor will improve the efficiency of freight and servicing trips on London's strategic transport network, including rail and river.

TfL recommends **a change to remove Proposal 16** as this is now superseded by the changes outlined above.

## Trams

Suggestions and concerns relating to the stated ambition for the tram network are noted. Extensions to the tram network will be considered where they enable the provision of more homes and jobs, and are supported by Area Action Plans. The Sutton extension is being considered in this context. Innovative funding mechanisms can be explored to deliver these extensions.

TfL recommends **a change to add a new proposal** in Chapter 5 outlining the principles that would apply for considering tram extensions and stating that the Mayor, through TfL and the boroughs, will explore opportunities for an extension to Sutton and potentially beyond.

TfL recommends **a change** to the narrative in Chapter 5 **to add** reference to the points outlined above and the potential for an extension to support new homes and jobs in the area.

TfL recommends **a change** to the narrative around Proposal 66 **to clarify** deliverables on the existing tram network and **to move** reference to extensions to Chapter 5 as outlined above.

TfL recommends **no change** to Proposal 66 as the issues raised are being addressed in the new proposal.

## **6.4.8 River Services (Policy 15 and proposals 68-69)**

### **Comments in support**

We received 95 supportive comments from stakeholders and businesses and 85 supportive comments from the public. Respondents supported the proposal to deliver a London Passenger Pier strategy. Particular areas of support were:

- Using the full potential of the Thames for public and commercial use, in particular increased passenger services
- Transferring freight from road to river
- Promoting new piers and increasing pier capacity
- Investigating potential of new cross-river ferry services in east London.
- Extending river transport services to Barking

### **Comments noting concerns or opposition**

We received 17 comments of concern from stakeholders and businesses and 24 comments of concern from the public. Particular area of concern was river freight and that the long term strategy for river freight is not clear enough.

### **Comments making suggestions**

We received 57 comments of suggestion from stakeholders and businesses and 10 comments of suggestion from the public. There was a call for a dedicated Rivers Commissioner and other suggestions included:

#### **River freight**

- A clearer strategy on river freight - including conduct a feasibility study of wharves to identify those for protection, restoration or (re)development
- Give more emphasis to strengthening the aspiration to transfer freight from road to river throughout the strategy

#### **River services**

- Provide more river services for commuting and leisure

#### **Interim river passenger targets**

- Specify intermediate river passenger target to provide a focus

## **TfL response and recommendation**

### **River freight**

The protection of wharves is a topic which would be considered by the London Plan. TfL, as part of the new Thames and London Waterways Forum will work with the Port of London Authority (PLA) and other key stakeholders to identify and promote opportunities move freight off the road network and on to the Thames and London's waterways.

TfL recommends **a change to add** a new section to the narrative on improving efficiency of freight networks within the *Efficiency of deliveries and servicing* section of Chapter 3, including a description of how the river network can support the broader aims of the strategy.

TfL recommends **a change to add a new proposal** within this new section to outline how the Mayor will improve the efficiency of freight and servicing trips on London's strategic transport network, including river and rail.

TfL recommends **a change to remove Proposal 16** as this is now superseded by the changes outlined above.

TfL recommends **no change** to Policy 15, Proposals 68-69 or the associated narrative to as the concerns and suggestions raised have been addressed by the new proposal and the associated narrative in Chapter 3 of the strategy.

### **River services**

Proposals 68 and 69 set out plans to investigate the potential of new river services.

TfL recommends **no change** to the strategy in response to these comments.

### **Interim river passenger targets**

The MTS sets the long-term strategic approach to transport in London for the next 25 years. Introducing interim targets may reduce the longevity of the strategy as short to medium-term trajectories are highly susceptible to change. Interim targets are more appropriate for subsequent delivery plans, the TfL Business Plan and similar documents, as these can be revised on a more frequent basis, while remaining aligned with the MTS.

TfL recommends **no change** to the strategy in response to these comments.

## 6.4.9 London's links with the Wider South East and beyond (Policy 16 and proposal 70-71)

### Comments in support

We received 34 supportive comments from stakeholders and businesses. Respondents supported the overall policy and gave qualified support for strategic investment on corridors in the Wider South East that support economic and housing growth, provided this growth is mutually beneficial and not solely for to the benefit of London.

### Comments noting concerns or opposition

We received 16 comments of concern from stakeholders and businesses and 8 comments of concern from the public. Respondents expressed concern that the strategy may imply that London's housing needs would be accommodated by neighbouring authorities.

### Comments making suggestions

We received 43 comments of suggestion from stakeholders and businesses and 13 comments of suggestion from the public. Suggestions were primarily around improving connectivity to neighbouring authorities, including making a stronger commitment to the Metropolitan Line Extension.

### TfL response and recommendation

#### **London's housing needs**

Concerns around this issue are noted. TfL believes the strategy is compatible with the *willing partners for growth* approach to development in the Wider South East.

TfL recommends **a change to Figure 35 to clarify the initial strategic infrastructure priorities identified in the draft London Plan.**

#### **Improving connectivity to neighbouring authorities**

Policy 16 states the importance of integrating regional public transport schemes into London's public transport system wherever practical.

TfL recommends **a change to Policy 16 to add reference to international travel (e.g. Channel Tunnel) to indicate that this is also within the scope of the policy.**

#### **Metropolitan Line Extension**

The Metropolitan Line Extension (MLX, formerly the Croyley Rail Link) was transferred from Hertfordshire County Council (HCC) to TfL for delivery on 20 November 2015. The project transferred with funding arrangements of £284.4 million. Since taking over the project, TfL has worked with the supply chain and

Network Rail to progress the design and obtain market prices for delivery. The outturn cost of the project will be significantly in excess of £284.4 million. The increased project costs weaken the MLX business case. The deteriorating business case and loss of its operating grant mean that TfL is no longer able to bear cost risk above the current £284.4 million funding package.

TfL recommends **no change** to the strategy in response to these comments.



## **6.4.10 Coaches (Proposal 72)**

### **Comments in support**

We received 16 supportive comments from stakeholders and businesses. Respondents supported well-connected coach facilities.

### **Comments noting concerns or opposition**

We received eight comments of concern from stakeholders and businesses and two comments of concern from the public. At a general level, respondents expressed concern about the lack of detail on coaches in the strategy.

### **Comments making suggestions**

We received 32 comments of suggestion from stakeholders and businesses and 19 comments of suggestion from the public. A key suggestion was that the strategy needs to better consider different types of coach service with calls for it to expand coverage of different types of coach service (e.g. tourism, education).

### **TfL response and recommendation**

#### **Different types of coach service**

Coaches can play an important role in enabling group travel, such as school trips and organised tours.

TfL recommends **a change to Proposal 72 to add** reference both scheduled and tourist coach service and their safe and efficient operation, and a commitment for TfL to work with delivery partners including the coach and tourism industries to develop FORS for coaches.

## 6.4.11 Public Transport and the Night-Time Economy (Policy 17)

### Comments in support

We received 46 supportive comments from stakeholders and businesses and 76 supportive comments from the public. Respondents supported developing London's night-time public transport services to support the growth of the night-time economy.

### Comments noting concerns or opposition

We received 7 comments of concern from stakeholders and businesses and 4 comments of concern from the public.

There were no substantial concerns expressed in relation to this policy.

### Comments making suggestions

We received 41 comments of suggestion from stakeholders and businesses and 11 comments of suggestion from the public. Key suggestions included:

- Improve safety and security on night services
- Extend night bus services to outer London

### TfL response and recommendation

#### **Safety and security**

People should feel safe and secure moving around London at any time of the day or night. Policy 3 sets out that TfL and the police will seek to ensure that crime and fear of crime remain low on London's transport system. "High-harm" crimes will be prioritised, as set out in Proposal 12. As part of this the Mayor's Night Czar is developing a Women's Night Safety Charter.

Policy 2 sets out ambitious aims for in-vehicle safety on buses.

TfL recommends **a change to add** a new section to Chapter 4 to address safety on the public transport system.

#### **Night Bus services**

Bus planning principles are covered by Policy 53 and the supporting narrative. The roll-out of Night Overground and extension of Night Tube services to more lines will require the Night Bus network to be reviewed to ensure we are making best use of our resources. This will be similar to the review process which took place when Night Tube initially opened.

TfL recommends **no change** to the strategy in response to these comments.

## **6.4.12 Taxi & Private Hire (Policy 18 and proposals 73-74)**

### **Comments in support**

We received 104 supportive comments from stakeholders and businesses and 113 supportive comments from the public. Particular areas of support were:

- Seeking Mayoral powers to limit the numbers of private hire vehicles (PHVs) and introduce a requirement that journeys start or end in Greater London
- Introducing better regulation of PHVs
- Reducing the number of PHVs
- Raising safety standards for taxis and PHVs

### **Comments noting concerns or opposition**

We received 67 comments of concern from stakeholders and businesses and 135 comments of concern from the public. Particular areas of concern were:

#### **Mode share aim**

- Taxis not included in the 80 per cent public transport / walking / cycling mode share aim

#### **Impact of PHV restrictions on those who use them**

- The impact of any restriction on cross-boundary PHV operation
- Reducing the numbers of PHVs could have an impact on those who use them

#### **Impact and regulation of large-scale app-based PHV operators**

- The perceived negative impact of large-scale app-based PHV operators and their regulation

### **Comments making suggestions**

We received 159 comments of suggestion from stakeholders and businesses and 293 comments of suggestion from the public. Key suggestions included:

- Strategy needs to be firmer on reducing the number of taxis and PHVs in operation
- Make taxis and PHVs more accessible to vulnerable users
- Ban taxis from idling
- Remove PHV exemption from the Congestion Charge

## **TfL response and recommendation**

### **Mode share aim**

The aim of this strategy is for 80 per cent of trips to be made by active, efficient and sustainable modes. While taxis have an important role to play in expanding travel horizons for those requiring safe, accessible travel options, their use does not typically entail an active travel stage. Therefore it would not be appropriate to include trips made by taxi within the 80 per cent as set out in the mode share aim.

TfL recommends **no change** to the strategy in response to these comments.

### **Impact of PHV restrictions on those who use them**

Any major changes to the private hire or taxi regulations are likely to be subject to a public consultation and also an Equality Impact Assessment. As part of this the impact on passengers would be taken into consideration.

TfL recommends **no change** to the strategy in response to these comments.

### **Accessibility**

Policy 18 sets out plans to ensure taxis and PHVs are safe, secure and accessible. TfL acknowledges that taxis can expand travel horizons for those requiring safe, accessible travel options. High-quality accessible taxi ranks are vital to this. Proposal 52 sets out plans to improve the accessibility of taxi ranks as part of a wider accessibility package. TfL also plans to consult on new proposals aimed at raising the standards for all private hire users.

TfL recommends **no change** to the strategy in response to these comments.

### **Reducing the number of taxis/PHVs**

The number of licensed taxis and drivers in London has been relatively stable for the past decade and it is not felt that action is needed to reduce the number of licensed taxis or taxi drivers. However, there has been a significant increase in the number of licensed private hire drivers and vehicles in the past few years and TfL is seeking new powers to allow the number of private hire licenses to be managed. This data is available at: <https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/licensing-information>.

TfL recommends **no change** to the strategy in response to these comments.

### **PHV exemption from the Congestion Charge**

TfL has been asked to undertake further work on the potential change and / or removal to Congestion Charge discounts and exemptions, including the current PHV exemption. Any change would align with draft Proposal 18, which states that the Mayor will keep existing and planned road user charging schemes under review to ensure they prove effective in furthering or delivering the policies and proposals of

this strategy. Any change to the Congestion Charge would be subject to consultation.

TfL recommends **no change** to the strategy in response to these comments.

### **Impact and regulation of large-scale app-based PHV operators**

In recent years, the taxi and private hire industries have changed with the emergence of app-based booking services and ridesharing. As the technological landscape continues to evolve we remain committed to ensuring London has safe, secure, accessible, world-class taxi and private hire services.

TfL recommends **a change** to the narrative **to clarify this point**.

Chapter six of the strategy outlines the principles for ensuring new transport services and technology support the delivery of the aims of the strategy.

### **Ban taxis from idling**

Action to address engine idling generally is referenced in Chapter 3 of the strategy.

TfL recommends **no change** to the strategy in response to these comments.

## 6.5 New homes and jobs

### 6.5.1 Transport and good growth (Policy 19)

#### **Comments in support**

We received 123 supportive comments from stakeholders and businesses and 430 supportive comments from the public. Particular areas of support were:

- Delivering new homes and jobs in line with the transport principles of 'Good Growth'
- Utilising transport to support housing development
- Unlocking growth potential in underdeveloped parts of the city

#### **Comments noting concerns or opposition**

We received 64 comments of concern from stakeholders and businesses and 688 comments of concern from the public. Particular areas of concern were:

- Improving transport links to underdeveloped areas will lead to rising property prices and rents; with areas becoming unaffordable and people being displaced to less accessible parts of the city where they would more likely rely on their cars
- Improvements will not be applied universally across London and will benefit only a few pockets of outer London
- Car use is demonised, even when it may be the most practical option, particularly for families living in outer London
- The impact of population growth on housing
- Opposition to new homes being built in London

#### **Comments making suggestions**

We received 108 comments of suggestion from stakeholders and businesses and 471 comments of suggestion from the public. Key suggestions included:

- The need for regional planning (collaboration across a number of boroughs) to bring forward developments that meet the principles of Good Growth
- A better spread of work places outside of central London would reduce the need to travel

## **Housing related comments**

We received a considerable number of comments regarding housing. Key issues were around housing costs, availability and planning standards. These fall outside the remit of the transport strategy and are more appropriate for the Mayor's London Plan and Housing Strategy. We have passed this feedback to the policy teams working on these strategies. Below is an overview of the key issues:

### **Cost**

- Concern about unaffordable housing
- Concern proposals don't support affordable housing in central London
- Concern about the cost of housing

### **Availability**

- Concern the housing market is distorted, affordable houses not available
- Concern about the impact of foreign investors on housing market
- Concern homes are only built for wealthy investors
- Suggest policy which penalises empty properties
- Suggest housing for key workers in London
- Suggest Londoners should have priority for housing (both private and affordable)

### **Planning Standards**

- Concern about building on the Greenbelt / use of Greenbelt for development
- Concern new homes will create extra pressures on other services
- Suggest enforcing policies which require developers to build affordable housing
- Suggest all new homes are built with gardens / outdoor space

## **TfL response and recommendation**

### **London Plan issues (cross-cutting)**

Several comments of concern and suggestion relating to this policy and the chapter more generally relate to issues within the scope of the London Plan, for which a consultation draft has now been published.

TfL recommends **a change** to the narrative throughout Chapter 5 to clarify that the MTS policy relating to Good Growth, and associated proposals, will contribute to the draft London Plan's priorities.

## **Affordability**

As London grows, it is essential that this growth is accommodated in a sustainable way, in line with the vision of the strategy. Improving transport links will enable more housing to be built in areas that otherwise could not be developed sustainably. Policy relating to the affordability of housing would be in scope of the Mayor's Housing Strategy and his London Plan. Standards relating to affordable housing would be in scope of the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

## **Benefits across London**

The principles of Good Growth can be applied at both small and large-scales. In terms of its application at a large-scale, Figures 44-50 demonstrate where transport could be the enabler of significant change to areas across different parts London: Lee Valley, south west London, inner east London and the Isle of Dogs, outer east London and the Thames corridor, Old Oak and Park Royal Opportunity Area, and south London. All Londoners will benefit from the application of these principles through reduced traffic dominance, better air quality and a better overall public transport experience citywide.

TfL recommends **no change** to the strategy in response to these comments.

## **Car use**

The MTS sets out plans to transform London's streets, improve public transport and create opportunities for new homes and jobs. To achieve this, we will need to reduce car use and encourage more people to walk, cycle and use public transport. A city of over 10 million people needs a transport system that supports 80 per cent of trips being made by active, efficient and sustainable modes. The policies and proposals in the strategy have been developed to make these modes a viable alternative to the car across all parts of London.

TfL recommends **no change** to the strategy in response to these comments.

## **Population growth and housing**

Concerns relating to the impact of population growth and housing are noted. The policies and proposals in the strategy have been developed to support London's growth and create opportunities for new homes to be delivered. The MTS evidence base concludes that 80 per cent mode share for walking, cycling and public transport can be achieved in the context of this population growth:

<https://tfl.gov.uk/cdn/static/cms/documents/mts-outcomes-summary-report.pdf>. More specific concerns relating to housing would be in scope of the Mayor's Housing Strategy and the London Plan.

TfL recommends **no change** to the strategy in response to these comments.



### **Opposition to new homes being built in London**

Spatial planning policy has been consulted on separately in the draft London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Need for regional planning**

Chapter 6b and Figure 54 emphasise that delivering the aims of the strategy will require collaboration by multiple stakeholders, including all boroughs. TfL will continue to support boroughs where they wish to work together on issues of a sub-regional nature.

TfL recommends **no change** to the strategy in response to these comments.

### **Spread of work places outside of central London to reduce the need to travel**

By following the principles of Good Growth, the need to travel in London will be reduced. Work trips only account for about a fifth of all trips made by London residents. Therefore reducing the need to travel for shopping, leisure and education purposes will also be important. Spatial planning is within the scope of the London Plan which is currently under consultation.

TfL recommends **no change** to the strategy in response to these comments.

## **6.5.2 Improving access to public transport (Proposal 75)**

### **Comments in support**

We received 25 supportive comments from stakeholders and businesses and 119 supportive comments from the public. Particular areas of support were:

- The densification of (mixed-use) development supported by the public transport network to enable active and sustainable travel
- The use of sustainable transport to deliver growth

### **Comments noting concerns or opposition**

We received 18 comments of concern from stakeholders and businesses and 351 comments of concern from the public. Particular areas of concern were:

#### **Densification**

- Densification, and the type of businesses attracted to such mixed-use developments, will advantage developers and wealthy residents and will drive others further out.

#### **Restriction on cars affecting viability of development**

- The move away from car could affect the commercial viability of developments and may not be practical in some circumstances (e.g. industrial land)

#### **Dwelling size**

- Local Authorities are approving developments that are not suitable for the needs of current and future Londoners, for example, too many small flats are being built rather than family homes
- Densification would normalise cramped and potentially unsafe living conditions, leading to a reduced quality of life
- Opposition to high rise blocks

#### **Impact of additional housing**

- Additional housing in London will lead to overcrowding and congestion

#### **Development location**

- New developments are not located close to relevant services

### **Comments making suggestions**

We received 32 comments of suggestion from stakeholders and businesses and 161 comments of suggestion from the public. Key suggestions included:

- Public Transport Access Levels (PTALs) should include a measure of walkability and the local cycle network
- Better regulation of building and planning industries to ensure housing supply meets the quantity and quality needed

## **TfL response and recommendation**

### **Densification**

Concerns relating to densification, the types of businesses and residents attracted to developments, and opposition to high rise blocks are noted. These are primarily issues for spatial planning policy and are therefore within the scope of the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Restriction on cars affecting viability of development**

Current Mayoral and TfL policy looks to ensure that at new development, the number of parking spaces provided is restricted, particularly in areas that are well connected by public transport. This ensures the development does not lead to additional congestion and supports the wider London Plan and the significant levels of growth it sets out. As public transport becomes more affordable, accessible and integrated, these restrictions can be increased to further support the switch away from a car-dependent city. Parking standards are within the scope of the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Dwelling size**

Concerns relating to dwelling size are noted. This is primarily an issue for spatial planning policy and is therefore within the scope of the London Plan, and is supported by the Strategic Housing Market Assessment. The assessment sets out the size mix of dwellings that are needed to meet London's need using evidence and household formation forecasts.

TfL recommends **no change** to the strategy in response to these comments.

### **Impact of additional housing**

London's growth necessitates at least 65,000 new homes to be built in London every year between now and 2041. The policies and proposals in this strategy, and more specifically the policies and proposals in Chapter 5 of this strategy, have been developed to ensure that this growth can be delivered in a way which does not lead to overcrowding and congestion, by putting the Healthy Streets Approach and the principles of Good Growth at the heart of planning decisions. The MTS evidence base concludes that 80 per cent mode share for walking, cycling and public transport can be achieved in the context of this population growth:

<https://tfl.gov.uk/cdn/static/cms/documents/mts-outcomes-summary-report.pdf>.

TfL recommends **no change** to the strategy in response to these comments.

### **Development location**

The principles of Good Growth and Proposal 75 make clear that development should be oriented towards public transport stations and stops to ensure connectivity, and developments should be mixed-use to reduce the need to travel.

TfL recommends **no change** to the strategy in response to these comments.

Ensuring housing supply meets the quantity and quality needed is addressed through housing targets and space standards in the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

Figure 38 in the MTS illustrates the potential for PTALs to be enhanced to include cycle access the public transport, and the accompanying narrative includes text describing how station catchments can be expanded if the local cycling network and infrastructure is good. However, it is important to consider the impact of higher density development further from stations if the local walking and cycling networks are not perceived as safe and welcoming. As such, a site by site approach is needed, so that local context can be taken into account, rather than a strategic policy to promote high density developments further away from stations than would normally be considered acceptable.

TfL recommends **no change** to the strategy in response to these comments.

### **Regulation**

Ensuring housing supply meets the quantity and quality needed is addressed in the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **6.5.3 Embedding active travel in new development (Proposal 76)**

#### **Comments in support**

We received 98 supportive comments from stakeholders and businesses and 188 supportive comments from the public. Particular areas of support were:

- Encouraging developers to promote sustainable travel
- Embedding active, sustainable travel in new developments; providing better walking and cycling infrastructure, including secure cycle parking
- Reduced car parking for new developments
- Car-free developments in central London and other highly accessible areas

#### **Comments noting concerns or opposition**

We received 48 comments of concern from stakeholders and businesses and 273 comments of concern from the public. Particular areas of concern were:

##### **Impact of parking restraint**

- Restricting car parking in new developments; cars will continue to be a necessity for some journeys as public transport isn't appropriate for all trips
- Car reduction will negatively impact on those with mobility impaired users / health issues / young families with children

##### **Impact of car-free developments**

- Concern over car-free developments in London causing issue with parking on external highway

#### **Comments making suggestions**

We received 68 comments of suggestion from stakeholders and businesses and 131 comments of suggestion from the public. Particular suggestions included:

- There should be a spatial approach to assessing car parking provision in new developments from a central, inner and outer London perspective
- Introducing cycle parking standards for new housing developments
- Continued car access for mobility impaired people
- Including a commitment to local crime reduction in proposal
- Making greater use of S106 and Community Infrastructure Levy (CIL) policies to ensure developers provide and pay towards walking and cycling infrastructure

- Strengthened wording around car and cycle parking standards to say, where parking is provided, new developments should support the switch to electric vehicles and other ultra-low emission vehicles, including through providing charging points
- All new developments should have these and they need to be developed earlier in the planning process

## **TfL response and recommendation**

### **Impact of parking restraint (including the impact on mobility impaired users)**

Current Mayoral and TfL policy looks to ensure that at new development, the number of parking spaces provided is restricted, particularly in areas that are well connected by public transport. This ensures the development does not lead to additional congestion and supports the wider London Plan, and the significant levels of growth it sets out. As public transport becomes more affordable, accessible and integrated, these restrictions can be increased to further support the switch away from a car-dependent city.

Parking standards are within the scope of the London Plan.

Concerns relating to car access for mobility impaired residents are noted.

TfL recommends **a change** to the car and cycle parking guiding principles in the narrative **to clarify** that there should be appropriate provision of dedicated spaces for disabled drivers.

### **Impact of car-free developments**

Concerns around car-free developments causing issue with parking on surrounding streets are noted. This can be addressed through restrictions (e.g. permits) and enforcement at a local level.

TfL recommends **no change** to the strategy in response to these comments.

### **Spatial approach to assessing car parking provision**

Suggestions relating to assessing car parking provision from a central, inner and outer London perspective are noted. The car and cycle parking principles set out an expectation for car-free development in London's more accessible areas. While these will mostly be in the Central Activities Zone (CAZ) or inner London, there will be some locations in outer London where this expectation should apply.

Parking standards are within the scope of the London Plan.

TfL recommends **a change** to the car and cycle parking guiding principles in the narrative **to clarify** that outside of the CAZ, car clubs could be provided in lieu of private car parking.

### **Commitment to local crime reduction**

This is not within the scope of a transport strategy and would be more relevant to the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Cycle parking standards**

The guiding principles for car and cycle parking standards state that development should have well-located and accessible cycle parking provision to meet minimum standards as set out in the London Plan.

Parking standards are within the scope of the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **S. 106 and CIL policies**

Suggestions to make greater use of S. 106 and CIL policies to ensure developers pay towards walking and cycling infrastructure are noted. The approach to funding the strategy is set out in Chapter 6.

TfL recommends **no change** to the strategy in response to these comments.

### **Electric vehicles**

The suggestion that where parking is provided, it should cater for electric vehicles is noted.

TfL recommends **a change** to the car and cycle parking guiding principles in the narrative **to clarify** that any residential parking spaces permitted should make provision for ultra low emission vehicles.

### **Delivery and service planning**

Suggestions relating to delivery and service planning are noted and addressed within Proposal 77 of the draft strategy.

TfL recommends **no change** to the strategy in response to these comments.

## **6.5.4 Embedding efficient freight and servicing in new developments (Proposal 77)**

### **Comments in support**

We received 22 supportive comments from stakeholders and businesses. Particular area of support was for embedding integrated and efficient delivery and servicing in new developments.

### **Comments noting concerns or opposition**

We received 8 comments of concern from stakeholders and businesses and 1 comments of concern from the public. A Particular area of concern was the deliverability of freight re-timing – maintaining operational integrity at mixed-use developments may require relaxing constraints on night-time servicing but the need to maintain quiet residential areas would necessitate maintaining these constraints.

### **Comments making suggestions**

We received 27 comments of suggestion from stakeholders and businesses and 10 comments of suggestion from the public. There was as a particular focus on the strategy encouraging greater use of cargo cycles for deliveries.

### **TfL response and recommendation**

#### **Re-timing**

Concerns relating to freight re-timing are noted.

TfL recommends **a change to Proposal 77 to clarify** that large-scale developments and area-wide plans should include a local freight and servicing strategy, which would provide the necessary framework to address these concerns.

#### **Cargo cycles**

The suggestion for greater use of cargo cycles for deliveries is noted. This is referenced within the 'Efficiency of deliveries and servicing' section of Chapter 3 and within Proposal 77

TfL recommends **a change to Proposal 77 to clarify** that the Mayor will seek the use of more active modes of delivery such as cargo cycles.



## **6.5.5 Using transport to support and direct good growth (Proposal 78)**

### **Comments in support**

We received 35 supportive comments from stakeholders and businesses and 86 supportive comments from the public. There was particular support for growth through transport investment and planning in the CAZ, Opportunity Areas and town centres.

### **Comments noting concerns or opposition**

We received 7 comments of concern from stakeholders and businesses and 145 comments of concern from the public. A particular concern was the lack of space for homes in central London.

### **Comments making suggestions**

We received 16 comments of suggestion from stakeholders and businesses and 275 comments of suggestion from the public. Key suggestions were:

- Brownfield sites should be used for new housing developments
- Focus on incentivising businesses to locate outside of central London zones to aid capacity issues
- Development should be focused outside of London to benefit the rest of the UK

### **TfL response and recommendation**

#### **Space for homes**

Concerns relating to the available land for homes in central London are noted. The MTS sets out an approach to using transport to support and direct Good Growth across the Greater London area. This means extending the network to open up new areas for homes, as well as maximising the capacity of the existing network, optimising land use around stations and radically improving conditions for walking and cycling.

Spatial planning is within the scope of the London Plan.

TfL recommends **a change** to the narrative around using transport to support and direct good growth **to clarify** that this will involve extending the network to open up new areas for homes and grow the catchments of town centres.

### **Brownfield sites**

The strategy supports bringing surplus transport land into use for the delivery of housing when it becomes available (Proposal 91). Spatial planning is within the scope of the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Incentivising business to locate outside of central London**

Spatial planning is within the scope of the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Focusing development outside of London**

London is the driving force of the UK economy and London's growth and success will benefit Londoners and non-Londoners alike. Regional development and spatial planning outside of London is a matter for government policy and the respective local authorities.

TfL recommends **no change** to the strategy in response to these comments.

## **6.5.6 Unlocking growth potential through new rail links and improved rail services (Proposals 79-84)**

### **Comments in support**

We received 98 supportive comments from stakeholders and businesses and 56 supportive comments from the public. Particular areas of support were:

- Utilising the opportunity of Crossrail 2 to maximise housing delivery and healthy new places
- Network Rail enhancements to West Anglia Mainline to enable and serve suitable development of the Upper Lea Valley
- Bakerloo line extension to Lewisham and beyond
- Extending the Elizabeth line eastwards beyond Abbey Wood
- Investigating a London Overground rail link between Hounslow and Old Oak
- Efforts to find opportunities for new rail stations that will unlock the potential for the creation of homes and jobs

### **Comments noting concerns or opposition**

We received 22 comments of concern from stakeholders and businesses and 38 comments of concern from the public. A particular area of concern was around new rail links, such as Crossrail 2, primarily serving non-London residents commuting into London.

### **Comments making suggestions**

We received 29 comments of suggestion from stakeholders and businesses and 10 comments of suggestion from the public. A key suggestion was the further extension of the Bakerloo line to Croydon.

### **TfL response and recommendation**

#### **Beneficiaries of new rail services**

New rail links such as Crossrail 2 will benefit London residents and non-residents alike. Beyond the direct benefits for those living and working along the route, other transport users will benefit from reduced crowding on parallel lines, improved facilities at key stations along the route and increased resilience of the overall network.

These large projects are vital to support new housing and employment growth and are critical components in delivering Healthy Streets, as a high quality public transport network is key to enabling mode shift away from the car. This will benefit the city as a whole.

TfL recommends **no change** to the strategy in response to these comments.

### **Bakerloo line extension**

The case for an extension beyond Lewisham and potential options including Croydon are currently being reviewed following responses from the 2017 public consultation feedback.

TfL recommends **no change** to the strategy in response to these comments.

## **6.5.7 Unlocking growth potential through improved bus services (proposal 85-87)**

### **Comments in support**

We received 57 supportive comments from stakeholders and businesses and 11 supportive comments from the public. Particular areas of support were:

- Improvements to local bus services and infrastructure to enable new developments
- Focus on investing in improving existing bus services alongside more ambitious infrastructure plans.
- Piloting bus transit networks in outer London Opportunity Areas
- Exploring the role for demand responsive bus services

### **Comments noting concerns or opposition**

We received 5 comments of concern from stakeholders and businesses and 1 comments of concern from the public. There were no significant areas of concern.

### **Comments making suggestions**

We received 20 comments of suggestion from stakeholders and businesses and 6 comments of suggestion from the public. There were no significant suggestions made.

### **TfL response and recommendation**

Comments in support of proposals 85 - 87 are noted and welcomed.

## **6.5.8 Unlocking growth potential through improved cross-river connectivity (Proposal 88-90)**

### **Comments in support**

We received 104 supportive comments from stakeholders and businesses and 40 supportive comments from the public. Particular areas of support were:

- Construction of the Silvertown tunnel
- Introduction of user charges on the Blackwall and Silvertown tunnels
- Promotion of new walking, cycling and public transport river crossings
- Consideration of additional road crossings of the river in east London

### **Comments noting concerns or opposition**

We received 67 comments of concern from stakeholders and businesses and 67 comments of concern from the public. Particular areas of concern were:

- Opposition to the construction of the Silvertown crossing due to adverse congestion and pollution impacts to surrounding areas
- Opposition to additional road crossings of the river in east London

### **Comments making suggestions**

We received 47 comments of suggestion from stakeholders and businesses and 74 comments of suggestion from the public. Particular suggestions were for additional road crossings of the river in east London with requests that the proposals for fixed road crossings at Gallions Reach and at Belvedere should be revisited urgently to maximise growth potential in east London

### **TfL response and recommendation**

#### **Silvertown crossing**

TfL has applied for permission to construct and operate the Silvertown Tunnel under the Development Consent Order (DCO) process and the examination was completed in April 2017. It is currently awaiting a decision from the Secretary of State on the application, and this is expected in May 2018, following a Government decision to move the deadline. The scheme will address the problems of persistent congestion, closures and lack of resilience for crossings in east London. The application outlines how the environmental and traffic impacts of the scheme will be managed, principally by the application of a flexible set of user charges.

[TfL recommends no change to the strategy in response to these comments.](#)

## **Additional road crossings of the river in east London**

Respondents had mixed views on Proposal 90, which sets out how the Mayor will give consideration to the case for further road crossings of the river in east London, and the criteria which should be met. Some respondents were strongly opposed to any additional road crossings, whereas some suggested that the criteria were too stringent and that proposals for crossings at Gallions Reach and Belvedere should be revisited urgently.

TfL understands the demand for further road crossings in east London and acknowledges the potential benefits. However, we also understand the concerns raised by some respondents about the potential impact of further crossings on car use and air quality. It is proposed therefore to retain the draft policy to prioritise a DLR extension in the short term, and to revisit the need for, and impacts of, further road crossings at a later date.

**TfL recommends a change to Proposal 90 to clarify that any new crossing would support Good Growth.**

## **6.5.9 New homes and jobs on transport land (Proposals 91-93)**

### **Comments in support**

We received 53 supportive comments from stakeholders and businesses and 10 supportive comments from the public. Particular areas of support were:

- Development of surplus transport land to provide affordable, sustainable housing
- Pursuit of mixed-use development and redevelopment in and around operational sites
- Decking over the A13 at Barking

### **Comments noting concerns or opposition**

We received 19 comments of concern from stakeholders and businesses and 9 comments of concern from the public. There were no substantial concerns expressed with regard to these proposals.

### **Comments making suggestions**

We received 40 comments of suggestion from stakeholders and businesses and 8 comments from the public. Key suggestions included:

- Reclaiming land from former car-related uses, for example car parking and unnecessarily wide roads
- A greater focus on affordable housing, including opportunities to build affordable housing in outer London
- Explore further opportunities for road decking

### **TfL response and recommendation**

#### **Reclaiming land from former car-related uses**

The MTS is clear that redesigned streets and public realm will prioritise people, and this will include reallocating space to people walking, cycling or using public transport. Designing streets that are safe for all users means designing in features that reduce speeds and encourage drivers to be more aware of people walking and cycling.

The strategy includes proposals to examine the feasibility of decking over roads and other transport infrastructure to provide land for housing. The Mayor encourages car parking that is underutilised to be redeveloped into higher density, mixed use development to make the best of use of land and encourage travel by walking, cycling and public transport. This is reflected in Chapter 5 of the MTS and throughout the draft London Plan.



TfL recommends **no change** to the strategy in response to these comments.

### **A greater focus on affordable housing**

Suggestions that there should be a greater focus on affordable housing, including opportunities to build affordable housing in outer London are noted. This is a matter for the Mayor's Housing Strategy and the London Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Further opportunities for road decking**

Decking over roads is expensive and must be carefully managed. Proposal 93 outlines plans to examine the feasibility of decking over the A13 at Barking. There may be further opportunities to do this but it is likely that these will be limited.

TfL recommends **no change** to the strategy in response to these comments.

## **6.5.10 Getting the planning process right (Proposal 94)**

### **Comments in support**

We received 15 supportive comments from stakeholders and businesses. Particular area of support was for the proposals to work with planning authorities within and beyond London in support of Good Growth.

### **Comments noting concerns or opposition**

We received two comments from stakeholders and businesses and three from the public. No substantial concerns were raised.

### **Comments making suggestions**

We received 27 comments from stakeholders and businesses. No substantial suggestions were raised.

### **TfL response and recommendation**

Comments in support of proposals for working with planning authorities within and beyond London in support of good growth are noted and welcomed.

## **6.5.11 Public transport links to airports / Focus on the unacceptable impact of expanding Heathrow (Policy 20 and proposals 95-96)**

### **Comments in support**

We received 79 supportive comments from stakeholders and businesses and 41 supportive comments from the public. Particular areas of support were at times conflicting and included:

- Improving surface links to London airports
- Seeking commitment from Government to fund and deliver transport measures supporting Heathrow expansion
- Another runway or alternative airport in the south-east (e.g. Gatwick or Stansted)
- The strategy's position on Heathrow expansion

### **Comments noting concerns or opposition**

We received 101 comments of concern from stakeholders and businesses and 57 comments of concern from the public. Particular areas of concern were:

#### **Heathrow expansion**

- Heathrow cannot be expanded with zero increases in air and noise pollution and traffic congestion
- Oppose the strategy's position on Heathrow expansion – suggest the Mayor supports the findings of the independent Airports Commission
- The aspiration for no net increase in passenger and staff highway trips as a result of Heathrow expansion is unachievable
- Concern over funding for transport schemes linked to Heathrow expansion, e.g. proposed Southern Rail Access

#### **Improving rail access to Heathrow without airport expansion**

- Proposed Southern rail link to Heathrow airport is needed with or without expansion
  - Some respondents expressed concern about the alignment for this scheme as shown in Figure 52

### **Comments making suggestions**

We received 175 comments of suggestion from stakeholders and businesses and 122 comments of suggestion from the public. Particular suggestions included:

## **Heathrow expansion**

- Opposition of Heathrow expansion should be unconditional
- Heathrow and/or Gatwick must be expanded as a priority to support the economy
- Heathrow expansion should be conditional on mitigation of air and noise pollution for all affected Londoners both now and in the future
- Heathrow expansion should only occur if improvements to public transport links will accommodate background growth as well as demand

## **Rail links to airports**

- Proposal should reference additional schemes, including Heathrow Southern Access, Heathrow Western Access and Brighton Main Line
- Rail links to all airports should be improved

## **Improving rail access to Heathrow without airport expansion**

- Surface access improvement to Heathrow is required regardless of its potential expansion

## **TfL response and recommendation**

### **Heathrow expansion**

The Mayor's position on expansion is clear in its opposition to Heathrow expansion, underpinned by the evidence presented to the Airports Commission and the Government's National Policy Statement (NPS), as well as analysis undertaken by TfL. In his submissions to Government, the Mayor is adamant that expansion cannot be taken forward as proposed, with severe noise and air quality impacts and without the transport investment that could accommodate the additional traffic from expansion alongside background demand.

The aspiration for no increase in highway trips is Heathrow Airport's, and is recognised by the Mayor as critical.

The Mayor seeks better use of existing capacity but also recognises the pressing need for new capacity so long as it can be delivered without severe environmental impacts or placing significant pressure on surface access networks. His aviation policy is further elaborated in the Draft London Plan.

[TfL recommends a change to the narrative to clarify that the aspiration for no increase in highway trips is Heathrow Airport's, not Government's.](#)

## Improving rail access to Heathrow without airport expansion

The Mayor believes investment in significant new public transport infrastructure is essential for Heathrow expansion and he remains deeply concerned that none is currently committed.

Since the draft MTS was published, a process has been launched with the key stakeholders to better understand the nature of the surface access requirement and assess the various options. Once the package of surface access schemes required to enable expansion is identified, it will be the responsibility of Heathrow Airport and the Government to set out how they will be funded, including a key role for the former. The Mayor has been explicit in his submissions to Government that it should not be left to Londoners to pay for the transport improvements required.

Government policy is to support Heathrow expansion and schemes which have not yet been committed such as Western Rail Access and Southern Rail Access should be developed on that basis. Should the Government reverse its policy support for a third runway, then the schemes can be reviewed on that basis, recognising that the objectives, design, business case and funding approach of any scheme could be considerably different under a non-expansion scenario.

TfL recommends **a change to Proposal 96 to add** a clause stating that the Mayor will engage with stakeholders to assess the various options for surface access to Heathrow.

So as not to prejudge the conclusion of that process, TfL recommends **a change to remove** the map showing the indicative alignment of the Southern Rail Access scheme and **a change** to the narrative **to clarify**, at a high level, what is required of any Heathrow surface access scheme.

## Rail links to airports

The importance of good rail links to all of London's airports is emphasised in the strategy. The strategy states that improvements should include:

- New, longer trains for Gatwick and Luton airports as part of the Thameslink Programme and Brighton Main Line upgrade, followed by next phase of upgrade and redevelopment of Gatwick Airport station.
- Upgrading the West Anglia Main Line serving Stansted airport, including four-tracking, to be followed by increasing frequencies associated with Crossrail 2.
- Enabling new routes and frequencies to Heathrow airport, with the delivery of the Elizabeth line.
- Further introduction of full-length and more frequent DLR services to London City airport.
- Increased frequencies on rail services to Southend airport.

- New automated people-mover to better connect Luton airport with the rail network.

TfL recommends **a change** to the narrative **to add** a reference to the next phase of the Brighton Main Line upgrade and the redevelopment of Gatwick Airport station.

## **6.6 Delivering the vision**

### **6.6.1 Principles for new transport services and technology / shared car and other low-occupancy services / new public transport and higher occupancy services / connected and autonomous vehicles (Policy 21 and proposals 97-101)**

#### **Comments in support**

We received 116 supportive comments from stakeholders and businesses and 28 supportive comments from the public. There were particular areas of support for:

- Ensuring that information and payment services evolve and remain fit for purpose
- Management of new transport services using the principles of the Healthy Streets Approach
- Supporting new technologies where they offer improvements to the operation of London's transport networks
- Ensuring shared-use schemes do not replace trips currently made on foot, cycle or public transport
- Trialling demand responsive bus services
- Support for trials of new vehicle technology (especially the development of autonomous and low emissions vehicles)
- Support for the guiding principles (e.g. an appropriate mix of policy and regulation) for autonomous vehicles outlined in MTS

#### **Comments noting concerns or opposition**

We received 100 comments of concern from stakeholders and businesses and 99 comments of concern from the public. Particular areas of concern were:

- New technology such as autonomous vehicles could lead to increase in car use/congestion
- Concern over the safety of autonomous vehicles (particularly the interaction with pedestrians and cyclists)
- Concern about the lack of detail in the strategy on emerging technologies and alternative sustainable vehicle options
- Questions over TfL's ability to keep up with new technology and regulation
- Concern that the strategy does not discuss how changing technology may impact travel demand

## **Comments making suggestions**

We received 218 comments of suggestion from stakeholders and businesses and 169 comments of suggestion from the public. Suggestions were generally around data sharing, how to better manage risk and opportunities presented by new technology and seeing new technologies as a measure to reduce car usage. There were requests for consideration of new technology to be given a greater focus in the strategy. Key suggestions included:

### **Data sharing**

- Requests for a clear commitment to data sharing with other bodies – especially boroughs and health bodies
- Standardised data sharing to encourage innovation should be included in the strategy

### **Removing barriers for disabled and older transport users**

- A commitment to ensuring technology removes barriers for disabled and older transport users and also that it does not create a digital divide

### **Mobility as a Service**

- Suggestions that the strategy should consider the concept of mobility as a service

### **Technology trials**

- Strategy needs to acknowledge importance of earlier preparation for new technology
- TfL needs to ensure that trials on new technology must look at the benefits they can deliver not just that they can work as an option
- TfL must ensure that new trials must make a full assessment of the impact on London of new technologies - not just impacts on safety, congestion, and environment but also on employment, equality and health. This needs to inform the development of regulation to manage risks.

### **Role and regulation of autonomous vehicles**

- Suggest the MTS needs to provide clearer policy framework for regulation of autonomous vehicles (e.g. legal and insurance legislation) and boroughs need to input into this
- The MTS should be clearer on future role of autonomous vehicles (including interface with electric vehicles) – ensuring we do not stifle innovation but equally that they do not create problems for London



- Suggestion that autonomous vehicles should be regarded as a solution for cutting down car usage

### **Car sharing**

- Requests for car sharing schemes (both formal such as car clubs and informal such as sharing school-runs) to be more actively encouraged as a means to reduce traffic levels
- Suggestion that autonomous vehicles should be regarded as a solution for cutting down car usage

### **Kerbside space**

- More information is required in the strategy about managing access to kerb side space as a tool to manage demand for car travel in a holistic way

### **TfL response and recommendation**

#### **New technology leading to increase in car use/congestion**

With the right mix of measures, new technology can offer enhanced public transport options and faster adoption of cleaner and safer vehicles for motorised journeys which cannot be made by more sustainable modes, while continuing to reduce overall levels of car use. However the strategy recognises that, if poorly managed, new car-based and other low-occupancy transport services could undermine this.

Policy 21 states in its guiding principles that new transport services should not encourage more car journeys. It also states that new transport services should help clean London's air, create a safer, quieter, more pleasant environment on London's streets, and use space efficiently.

TfL recommends **a change to clarify the principles stated in Policy 21** as set out below:

- Add reference to reducing carbon emissions to the environmental principle (cleaning London's air)
- Provide more detail on how to manage introducing technology directly onto the street
- Emphasise that technology may provide opportunities to reallocate vehicle space to people walking and cycling

In order to achieve this, TfL will require a proactive role. Therefore, TfL recommends **a change to Policy 21 to clarify** that TfL will explore, influence and manage new transport services in London guided by these principles.

TfL recommends **a change to the narrative to clarify the context for the policy changes above.**

## **Safety of autonomous vehicles**

Safety concerns relating to autonomous vehicles are noted. Policy 21 makes clear that new transport services must create a safe environment on our streets.

TfL recommends **a change** to the narrative to **clarify** how autonomous vehicles can potentially contribute to a safer street environment.

## **Detail on emerging technologies**

The MTS sets out a long-term vision for London, and the policies and proposals required to achieve this. The technological landscape in London has changed very quickly in recent years, and will continue to change over the next two decades which are covered by this strategy. In this context, it is appropriate to set out guiding principles within the policy, rather than base policy decisions on a technological landscape which will inevitably change. Further detail on current emerging technologies is therefore not appropriate for this strategy.

TfL recommends **a change** to the narrative to **clarify** that while some technologies will only begin to emerge in future years or decades, many are more immediate and can be used to make active travel and public transport use easier to do right now, in support of the policies and proposals of the strategy.

## **Keeping up with new technology and regulation**

The technological landscape in London has changed very quickly in recent years, and will continue to change over the next two decades which are covered by this strategy. This will have an impact on both transport supply and demand for transport as well as people's travel behaviours. To ensure London's transport system keeps up with new and developing technology, TfL has created a Directorate of Innovation. TfL will continue to conduct horizon scanning to ensure that we are aware of new technologies coming into use, and can respond appropriately through policy, regulation and improvements to our public transport offer. The strategy recognises the inherent uncertainty in the technological landscape, and the policies and proposals in chapter 6a have been developed to ensure that London can make the most of what new technology and services can offer.

TfL recommends **no change** to the strategy in response to these comments.

## **Data sharing**

TfL operates an open data policy. In the future, it is important that lessons are learned from trials and emerging transport services.

TfL recommends **a change to Policy 21** to **clarify** that new services should where possible share data and other knowledge with stakeholders including TfL and the GLA, to enable improved monitoring, operating and planning of the transport network.

## Removing barriers for disabled and older transport users

The concept of opening travel to all is included within the guiding principles for new transport services outlined in Policy 21.

TfL recommends **no change** to the strategy in response to these comments.

## Mobility as a Service

The term 'Mobility as a Service' (MaaS) can often be used inconsistently, though it usually refers to a number of different ideas around using technology to integrate access to, information on and payment for new and existing transport services.

Rather than explicitly referring to MaaS in broad terms, the MTS focuses a number of potentially related issues, including:

- The role of improving payment platforms and information services
- Demand responsive bus services
- The potential benefits and risks of new transport services, particularly car-based services

In line with Policy 21, any development of MaaS-related concepts should avoid the risk of increasing overall car use through making car-based services easier to access (see car sharing below).

TfL recommends **no change** to the strategy in response to these comments.

## Technology trials

It is essential that technology trials are geared towards achieving the aims of the strategy as a whole.

TfL recommends **a change** to the narrative in the 'New public transport and higher-occupancy services' section **to clarify** this.

TfL recommends **a change** to **Proposal 99** to align it more clearly with **Proposal 87** (demand-responsive bus services).

## Role and regulation of autonomous vehicles

The guiding principles set out in Policy 21 will be used to ensure new technologies, such as autonomous vehicles, do not undermine the Healthy Streets Approach by leading to a growth in car use at the expense of a move to walking, cycling and public transport. Proposal 100 sets out plans to trial new vehicle technology and consider its application in support of the Healthy Streets Approach. Proposal 101 makes clear that TfL will work with the DfT and other stakeholders to adopt appropriate regulation to ensure new vehicle technology is used in a way consistent with the strategy.

TfL recommends **no change** to the strategy in response to these comments.

## **Car sharing**

Car sharing can have a role to play in reducing overall car use in London, providing it is used as an alternative to private cars, rather than to walking, cycling or public transport.

However, all forms of car travel use of road space inefficiently compared to public transport, walking or cycling, as illustrated by Figure 53 in the draft MTS. The amount of space required for 67 people in private cars is the same as that needed for 67 people travelling in cars that are not owned by those using them.

TfL recommends **a change** to the strategy **to add** a definition of shared cars to the glossary and **a change to Figure 53 to clarify** its meaning.

## **Kerb space**

Suggestions relating to managing kerb space are noted. Proposal 98 states that the Mayor will explore and monitor the relationship between access to kerb space and the level of demand for all forms of car travel to inform assessment of how demand management measures should evolve over time.

TfL recommends **no change** to the strategy in response to these comments.

## **6.6.2 Delivery, funding and powers (Policy 22 and proposal 102)**

### **Comments in support**

We received 62 supportive comments from stakeholders and businesses and 10 supportive comments from the public. Respondents were broadly supportive of new measures outlined to ensure future adequate funding. There were equal levels of stakeholder support and opposition to Mayoral control over Vehicle Excise Duty (VED). Particular areas of support were:

- Devolving financial regulatory powers to GLA/TfL to fairly fund the transport system
  - Devolving VED (or share thereof) to provide revenue for investment in strategic roads in London
- Funding schemes from monies raised from road user charging
- Financing infrastructure projects from land value uplift
- Support for the proposed role of Boroughs in delivering the strategy

### **Comments noting concerns or opposition**

We received 131 comments of concern from stakeholders and businesses and 748 comments of concern from the public. At a general level, respondents expressed concerns regarding overall costs of the proposals (in particular the level of capital investment needed), whether the public will be expected to fund this through taxation or increased fares, and deliverability in relation to the scale of ambition in the strategy. Some respondents felt the approach to funding is unrealistic. There were equal levels of stakeholder support and opposition to Mayoral control over VED. Some respondents opposed devolution of powers to the Mayor more generally.

More specific areas of concern were:

#### **Funding methods**

- The proposal to devolve further financial powers to London
- The use of business rates and CIL funding to raise funds for investment especially as a means of funding Crossrail 2
- Devolving VED (or share thereof) to provide revenue for investment in strategic roads in London

#### **Funding priorities**

- Bias of investment towards transport in central London and that significant investment will be required in outer London infrastructure in order to meet active travel goals.

- Policies and proposals are a money making scheme

### **Deliverability/Resilience of funding streams**

- The strategy is not clear enough on how the proposals will be funded – in terms of where the money is coming from, whether it is sufficiently adequate and what contingency plan there is if additional funding sources can not be found.
- Levels of borough funding and whether it is sufficient for them to deliver schemes
- Adequate funding would require increasing taxes/borrowing more money.
  - Level of opposition to additional taxes on motorists.

### **Funding for active travel**

- The strategy is not clear on how Healthy Streets will be funded
- Unclear on whether sufficient funds have been allocated
- These types of schemes being hard to fund using revenue-based models

### **Delivery Plan and Implementation**

- Concern over lack of detail on delivery with request for a more detailed phased delivery plan
- Concern MTS needs more detail on implementation

### **Consistency across Mayoral Strategies**

- Concern over the relationship and interdependences with the other Mayoral strategies. Particularly seeking assurances that the timescales with the London Plan will align and how the MTS aligns with the other strategies.

### **Suitability of proposals for outer London**

- Concern that many of the policies and proposals (especially concerning mode shift) are unsuitable/undeliverable in outer London

### **Role of government**

- Concern that policy needs support from central government

### **Local politics, co-ordination between authorities and borough funding**

- Concerns that the proposed approach for boroughs to deliver the strategy will not work. Examples included the lack of political will to deliver the strategy in some boroughs and variances in funding and resources affecting delivery.

## **Comments making suggestions**

We received 240 comments of suggestion from stakeholders and businesses and 139 comments of suggestion from the public. Key suggestions included:

### **Funding methods**

- Real progress must be made on securing enhanced fiscal devolution to the capital to place future transport infrastructure funding on a secure footing
- There needs to be greater transparency in the way schemes are funded

### **Funding for active travel and public transport**

- Provide more funding to deliver active travel improvements, especially for cycling and walking infrastructure
- Invest more in public transport infrastructure

### **Role of boroughs**

- Devolve powers and funding to boroughs as well as the Mayor
- Amend Policy 22 to recognise role of boroughs and the need to provide adequate funding for them to be able to play a full role in delivery of the MTS

### **Private business/developer investment in transport**

- Increase private business/developer investment in transport

### **Local politics, co-ordination between authorities and collaboration with others**

- Suggest greater co-ordination between boroughs is required. The delivery and quality of schemes must be consistent across boroughs and the Mayor should play a stronger role in co-ordinating this.
- Suggest more collaboration is required with authorities and transport bodies that neighbour London to ensure sustainable transport aligns and also that unintended consequences are considered and managed – for example the issue of displaced traffic from ULEZ.
- Suggest a more collaborative and integrated approach is needed with private sector/BIDs/Business
- Suggest a baseline strategy delivery plan is needed to co-ordinate boroughs

### **Role of the public**

- Suggest more public input is needed to the strategy

## Modelling

- Suggest a change to modelling and traffic assessment tools required to give high priority to sustainable modes

## TfL response and recommendation

### Overall cost of proposals

The Government has set the National Infrastructure Commission's fiscal remit between 1 per cent and 1.2 per cent of GDP each year from 2020 to 2050; the level of expenditure envisaged by the strategy is broadly in line with this at 0.9 per cent of London's Gross Value Added.

Proposal 102 sets out three ways of ensuring the strategy is adequately funded: maximising available efficiencies, ensuring sustained level of funding from existing sources of income, and seeking additional financial powers. The exact mix of these, and the projects and programmes they fund, would be considered as part of TfL's annual business planning process. This would take place in the context of Policy 10, which states that the Mayor will ensure public transport fare levels are set to enable access to affordable travel for all Londoners.

TfL recommends **no change** to the strategy in response to these comments.

### Funding methods, priorities and Mayoral powers

As stated in the strategy, there is a large gap between the wealth that London's economy generates and its ability to fund the major investment on which its success depends. London controls relatively little of the tax raised within it and this means it can appear over-reliant on central government.

TfL is having to absorb an average £700m per year cut in Government funding over five years, with the grant to support operating costs removed from 2018/19. While TfL is implementing a comprehensive cost reduction programme which will transform the organisation, in the long-term there will need to be sustained investment in both operating transport services and new capital investment, while maintaining an operational surplus. Expenditure will need to meet the needs of Londoners and deliver a sustained growth in revenue to fund continued investment.

The Mayor must have the right range of powers in order to ensure continued investment in the transport system to support London's growth. An example of this would be using VED to provide revenue for investment in London's strategic roads. This will deliver benefits to London, the Wider South East and the UK as a whole. In 2015 the Chancellor announced England would have a dedicated Roads Fund by the end of decade using ring fenced money coming directly from Vehicle Excise Duty to spend on the strategic road network. Parts of the Strategic Route Network in London were transferred to TfL in 2000. If these roads were still under Highways England's control, they would benefit from the Roads Fund.



Major schemes such as Crossrail 2 bring London-wide benefits for the economy, the ability to deliver housing and to make the public transport network resilient as the city grows. The Mayor believes that business rates, CIL and other sources of funding are appropriate to maximise the contribution London can make to such schemes.

Suggestions regarding transparency of how schemes are funded are noted. TfL's annual business plan outlines how schemes will be funded over a five year period.

TfL recommends **no change** to the strategy in response to these comments.

### **Deliverability/resilience of funding streams**

A strategy that covers a period of 25 years will inevitably include projects and proposals that are not fully funded. As outlined in Chapter 6b, Policy 22 and Proposal 102, , we will fund the delivery of the strategy through maximising efficiencies, ensuring value for money and seeking to ensure a sustained level of funding from fares, Business Rate Retention and other existing sources of income. We will also work with the government to seek additional financial powers related to Land Value Capture and the devolution of VED to create a fairer way of funding transport schemes. Detailed spending decisions at a programme level will continue to be assessed and prioritised in TfL's annual Business Plan.

TfL recommends **no change** to the strategy in response to these comments.

### **Role of boroughs**

All the policies and proposals within the MTS will require determination and collaboration; with the London boroughs and neighbouring authorities, with the government, with transport operators, businesses, and with everyone who makes London their home. TfL recognises the important role boroughs will need to play in delivery of the MTS. This is highlighted in Chapter 6b, in particular in reference to Local Implementation Plans (LIPs, Policy 23).

The Local Implementation Plan (LIP) guidance is being consulted on separately. This sets out the mechanism by which the boroughs secure funding from TfL towards schemes that meet the MTS aims and objectives at a local level.

TfL recommends **no change** to the strategy in response to these comments.

### **Funding for active travel and public transport**

The MTS sets out proposals at a strategic level. Funding for active travel and public transport schemes will continue to be assessed and prioritised in TfL's annual Business Plan.

TfL recommends **no change** to the strategy in response to these comments.

## **Private business/developer investment in transport**

The draft strategy outlines plans to fund the strategy which include business rates, CIL and Section 106 payments. In addition, further devolution of powers would allow proposals to finance infrastructure projects from land value uplift.

TfL recommends **no change** to the strategy in response to these comments.

## **Delivery Plan/Implementation**

The strategy includes an implementation plan, which provides indicative timescales and costs for schemes at a strategic level. Given the strategy covers a period of 25 years, it would not be appropriate to provide a detailed delivery plan, particularly as some proposals are currently not funded. More detail on delivery will be provided as part of the TfL's annual Business Plan, and in daughter documents published over the lifetime of the strategy.

TfL recommends **a change** to the narrative associated with the implementation plan **to add** detail on how mode shift will be delivered in different parts of London, and how the Healthy Streets indicators will be applied.

## **Consistency across Mayoral strategies**

The Mayor has statutory strategies for Transport, Health Inequalities, Economic Development, Housing, Environment and Culture, as well as the London Plan. The Mayor is ultimately responsible for writing all of these strategies, thereby ensuring consistency of policy.

TfL recommends **no change** to the strategy in response to these comments.

## **Suitability of proposals for outer London**

Concerns relating to the suitability of proposals for outer London are noted.

TfL recommends **a change to add** an additional section to the narrative alongside the implementation plan to illustrate how the strategy will work in central, inner and outer London.

## **Local politics, co-ordination between authorities and borough funding**

The MTS sets out a vision and approach to transport planning until 2041. This will overlap with multiple political cycles at local, regional and national level. It is inevitable that political control of various authorities within and outside of London will change during this period.

However, to ensure London's success, it is essential that a coherent long-term approach is taken. This is particularly important when trying to influence travel behaviours, deliver environmental improvements and plan and deliver large-scale infrastructure projects.

All the policies and proposals within the MTS will require determination and collaboration; with the London boroughs and neighbouring authorities, with the government, with transport operators, businesses, and with everyone who makes London their home. Chapter 6b and Figure 54 emphasise that delivering the aims of the strategy will require collaboration by multiple stakeholders, including all boroughs. Separate guidance relating to LIP funding is under consultation. Further detail on how the strategy will be funded is provided under Policy 22.

TfL recommends **no change** to the strategy in response to these comments.

### **Role of government**

All the policies and proposals within the MTS will require determination and collaboration; with the London boroughs and neighbouring authorities, with the government, with transport operators, businesses, and with everyone who makes London their home. Chapter 6b and Figure 54 emphasise that delivering the aims of the strategy will require collaboration by multiple stakeholders, including government.

TfL recommends **no change** to the strategy in response to these comments.

### **Role of the public**

The MTS sets out a long-term approach to planning transport in London. TfL will continue to consult on individual schemes as they are planned and delivered.

TfL recommends **no change** to the strategy in response to these comments.

### **Modelling**

Individual schemes are assessed on a case-by-case basis to ensure they are delivering against the aims of the transport strategy. Strategic modelling has concluded that 80 per cent mode share for walking, cycling and public transport can be achieved through the policies and proposals in the strategy:

<https://tfl.gov.uk/cdn/static/cms/documents/mts-outcomes-summary-report.pdf>.

TfL recommends **no change** to the strategy in response to these comments.

### **6.6.3 Local Implementation Plans (Policy 23)**

This section refers to in principle comments about the LIPs process. A separate engagement exercise has taken place on developing the technical LIPs guidance and this will be reported separately.

#### **Comments in support**

We received 19 supportive comments from stakeholders and businesses. Respondents were supportive of continued commitment to LIPs and boroughs drafting LIPs that will support the delivery of the MTS.

#### **Comments noting concerns or opposition**

We received 22 comments of concern from stakeholders and businesses and 2 comments of concern from the public. There were no substantial issues of concern/opposition raised for this policy. More detailed concerns regarding the technical LIPs guidance will be reported separately.

#### **Comments making suggestions**

We received 47 comments of suggestion from stakeholders and businesses and 53 comments of suggestion from the public. Particular suggestions included:

- Greater collaborative working is required on the development of LIPs with other bodies such as BIDs and Health and Well Being Boards
- Provide more clarity on Healthy Streets in terms of how it will be assessed and more support and guidance from TfL on how to implement it
- More monitoring of consistency of standards of LIPs schemes is required
- GLA/TfL will need to lead on some elements of the strategy as a borough level management may be problematic in terms of consistency – for example on road charging and freight management
- Sub-regional frameworks are required to ensure effectiveness of LIPs

#### **TfL response and recommendation**

##### **Collaborative working**

The London boroughs are essential partners in the delivery of the MTS, working with local residents, businesses and other stakeholders to effect change and improvements through the LIPs. Chapter 6b and Figure 54 emphasise that delivering the aims of the strategy will require collaboration by multiple stakeholders

TfL recommends **no change** to the strategy in response to these comments.

## **Clarity on Healthy Streets assessment and implementation**

Comments relating to clarity of Healthy Streets assessment and implementation are noted. The LIP guidance has been consulted on separately. In addition, TfL has published the first suite of tools in our Healthy Streets Toolkit:

<https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets> to help stakeholders put the Healthy Streets Approach into practice. These tools cover the whole process from initial assessment, through implementation, to evaluation.

TfL recommends **no change** to the strategy in response to these comments.

## **Monitoring**

Comments relating to monitoring of LIP scheme standards are noted. Proposal 103 states that the Mayor, through TfL, will offer support and guidance to ensure that local transport schemes and initiatives as set out in the LIPs are supported by monitoring plans that demonstrate delivery against the policies, proposals and expected outcomes of the strategy. The LIP guidance has been consulted on separately.

TfL recommends **no change** to the strategy in response to these comments.

## **GLA / TfL lead instead of Boroughs on some projects**

All the policies and proposals within the MTS will require determination and collaboration; with the London boroughs, with the government, with transport operators, businesses, and with everyone who makes London their home. Chapter 6b and Figure 54 emphasise that delivering the aims of the strategy will require collaboration by multiple stakeholders.

All boroughs have been asked to produce traffic reduction strategies as part of LIPs, with the aim of reducing car and freight traffic levels across London. This means providing alternatives to car use, discouraging unnecessary trips, looking at how street space is used most efficiently, supporting car-free lifestyles and taking action to reduce and re-time freight trips. TfL will offer boroughs support for the development and administration of demand management schemes and will work with boroughs to ensure these schemes are coordinated across London to increase their effectiveness and reduce costs.

TfL recommends **no change** to the strategy in response to these comments.

## **Sub-regional frameworks**

Chapter 6b and Figure 54 emphasise that delivering the aims of the strategy will require collaboration by multiple stakeholders, including all boroughs. TfL will continue to support boroughs where they wish to work together on issues of a sub-regional nature.

TfL recommends **no change** to the strategy in response to these comments.

## **6.6.4 Outcomes and Monitoring (Policy 24 and proposal 103)**

### **Comments in support**

We received 22 supportive comments from stakeholders and businesses and 1 supportive comments from the public. There was support for the principle of monitoring progress and reviewing delivery plans if it looks like outcomes are unlikely to be achieved.

### **Comments noting concerns or opposition**

We received 11 comments of concern from stakeholders and businesses and 126 comments of concern from the public. There were no substantial issues of concern/opposition raised for this policy and proposal.

### **Comments making suggestions**

We received 44 comments of suggestion from stakeholders and businesses and 45 comments of suggestion from the public. A key suggestion was for the strategy to include interim targets to allow effective monitoring - with suggestions for annual or at least medium term goals.

### **TfL response and recommendation**

#### **Interim targets**

The MTS sets the long-term strategic approach to transport in London for the next 25 years. Introducing interim targets may reduce the longevity of the strategy as short to medium-term trajectories are highly susceptible to change. Interim targets are more appropriate for subsequent delivery plans, the TfL business plan and similar documents, as these can be revised on a more frequent basis, while remaining aligned with the MTS.

**TfL recommends no change to the strategy in response to these comments.**

## 6.7 Other comments

### Comments

We received 72 comments from stakeholders and businesses and 1,145 comments that fall outside of the main chapters of the MTS. They are a mixture of concerns and suggestions and key issues noted include:

- Concerned about the impact of local politics and political cycles on the success of the delivery of the strategy
- Concerned that accumulative affect of policies will adversely affect businesses
- Concerned about the accumulative affect of the strategy on the cost of living
- Concerned the strategy is politically (left wing) and ideologically (anti-car/pro-bike) biased
- Concern that there is consistency across all the Mayoral plans and strategies
- Concern that the scope of the policies and proposals is limited
- Suggested risks and opportunities presented by Brexit should be included
- Suggested it will require collaborative working with a number of other transport providers and authorities within and neighbouring London
- Suggested more work should be done to follow international best practice guidance

### TfL response and recommendation

#### **Impact of local politics and political cycles**

The MTS sets out a vision and approach to transport planning until 2041. This will overlap with multiple political cycles at local, regional and national level. It is inevitable that political control of various authorities within and outside of London will change during this period.

However, to ensure London's success, it is essential that a coherent long-term approach is taken. This is particularly important when trying to influence travel behaviours, deliver environmental improvements and plan and deliver large-scale infrastructure projects.

TfL recommends **no change** to the strategy in response to these comments.

#### **Impact on business**

London's growth is underpinned by its thriving business and industry, which helps make it the driving force of the UK economy. It is essential for London's continued success that it becomes a city where walking, cycling and public transport are the most appealing and practical choice for many more journeys. By reducing

congestion, improving London's air quality, tackling crowding and supporting new homes, the policies and proposals within the MTS will ensure that London remains a prime location to do business.

TfL recommends **no change** to the strategy in response to these comments.

### **Impact on cost of living**

Cost of living is central to several elements of the MTS. The Healthy Streets Approach puts quality of life at the heart of transport planning decisions. Policy 10 (affordability) makes clear that public transport fares should be set to enable access to affordable travel for all. Proposals to improve connectivity to support new homes, and to build homes on transport land will increase the availability of affordable housing in London. Chapter 6 outlines how the strategy will be funded, including a combination of efficiency savings, existing revenue streams and proposals to devolve financial powers to London.

TfL recommends **no change** to the strategy in response to these comments.

### **Political / Ideological bias**

London's Mayor is elected on a four-year term and he or she has a statutory responsibility to have a transport strategy, as set out in the GLA Act (1999). London must become a city where walking, cycling and public transport becomes the most appealing and practical choice for many more journeys. Encouraging more people to walk and cycle across London will help reduce harmful emissions, release extra capacity on public transport and make it easier for people to switch from private vehicles. It will also get people more active on a daily basis, helping to play a vital role in solving London's inactivity crisis. More walking and cycling in London will ultimately make the city a better place in which to live, work and visit, improving quality of life for all Londoners. These themes were part of the Mayoral manifesto in 2016.

TfL recommends **no change** to the strategy in response to these comments.

### **Consistency across Mayoral strategies**

There are Mayoral statutory strategies for Transport, Health Inequalities, Economic Development, Housing, Environment and Culture, as well as the London Plan. The Mayor is ultimately responsible for writing all of these strategies, thereby ensuring consistency of policy.

TfL recommends **no change** to the strategy in response to these comments.

### **Scope of policies and proposals**

The MTS is one of a set of statutory Mayoral strategies covering devolved issues. There are Mayoral statutory strategies for Transport, Health Inequalities, Economic Development, Housing, Environment and Culture, as well as the London Plan. While



there is some overlap between these different strategies, the scope of the MTS, its policies and proposals is primarily focused on transport planning issues

TfL recommends **no change** to the strategy in response to these comments.

## **Brexit**

As part of the supporting evidence for the MTS (<https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports?intcmp=3120#on-this-page-2>), a core reference case has been produced to build on TfL's understanding of current travel and present possible future travel volumes, distribution and mode share. This has formed the basis of analysis identifying the challenges and opportunities facing London and its transport network over the period to 2041.

TfL has developed an approach which recognises the intrinsic uncertainty in forecasting future travel demand. A set of five sensitivity tests have been fully modelled and assessed, reflecting a range of assumptions about population, employment and economic growth, and the cost of car and public transport use. The results show that the broad conclusions of the core reference case are a robust basis on which to plan.

TfL recommends **no change** to the strategy in response to these comments.

## **Collaborative working with other transport providers and authorities**

TfL agrees that collaboration will be vital to deliver the policies and proposals in this strategy. It will require determination and collaboration with boroughs, government, transport operators, businesses and everyone who makes London their home. Chapter 6b and Figure 54 emphasise that delivering the aims of the strategy will require collaboration by multiple stakeholders.

TfL recommends **no change** to the strategy in response to these comments.

## **International best practice**

In many areas, London is a leading world city in transport planning best practice. TfL continues to take note of international best practice across all areas of transport through its participation in international benchmarking projects and by playing an active role in groups such as the Union Internationale des Transport Publics (UITP) and Urban Transport Group (UTG) and in transport planning and policy development more generally.

TfL recommends **no change** to the strategy in response to these comments.

## 6.8 Integrated Impact Assessment (IIA)

### Comments

We received 16 comments from stakeholders and businesses and 97 comments from the public on the independent Integrated Impact Assessment of the draft MTS. Of the public comments, 11 were in the support of the approach and findings of the IIA. There were no supportive comments noted from stakeholders or businesses.

There were 8 stakeholder and business comments and 59 public responses noting concern and/or opposition and key issues raised included:

- General concerns about IIA methodology. In particular, the approach taken for assessing the impact on people with disabilities.
- Would like reassurances that IIA's will also take place for individual proposals/measures before they are put into action
- Concern about the assessment methods not being independent enough

There were 7 stakeholder and business comments and 27 public responses with suggestions to improve the IIA and key issues raised included:

- There were general calls for the scope of the assessment parameters to be widened. Examples of this included:
  - the impact on businesses – especially SMEs and commercial drivers;
  - the impact of Brexit (especially on immigration);
  - and calls for the inclusion of financial and economic impacts

### TfL response and recommendation

The IIA Report was developed in accordance with the Office of the Deputy Prime Minister SEA Guidance, *A Practical Guide to the Strategic Environmental Assessment Directive* (2005). As such the content of the IIA Report itself cannot be changed.

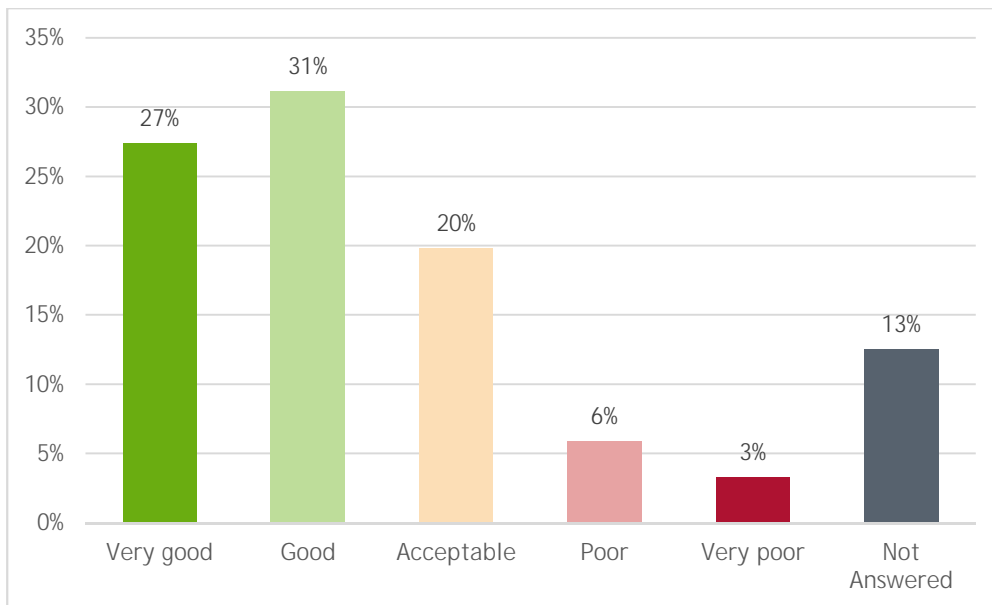
However, in line with this guidance, the comments received on the IIA Report will be addressed within recommended changes to the MTS itself, and subsequently summarised in the IIA Post Adoption Statement which will accompany the publication of the MTS in Spring 2018.

Specific IIA comments will be addressed within the IIA Post Adoption Statement.

# Chapter 7 - Quality of consultation

## 7.1 Overview

We asked those that identified themselves as individuals ('the public') to tell us what they thought about the quality of our consultation. The responses are set out in the table below:



We also received comments on the consultation from 10 Stakeholders.

We reviewed all open text comments to identify themes - these are detailed below.

## 7.2 Key Issues

The key issues raised in the consultation and suggestions for how it could be improved included:

### Issues with consultation materials

- Page numbers in Draft Strategy do not match pages in the pdf which made it difficult to switch from one to another
- Problems with website / links / pdfs do not work
- Lack of justification for proposals / no cost or benefit analysis provided
- Poor proposal / poor quality graphics / maps
- Consultation materials not clear / could have been better presented
- Consultation not well publicised / accessible/relevant to all

- Too long/ time consuming / complicated / technical
- Too little information/ details too vague
- Should have provided a summary of the key items/items referred to in the questions
- Leading questions / proposal is biased / a sham

#### **Issue with consultation process**

- More public input needed
- Waste of money / time
- Sceptical about consultation
- Consultation biased/decision has already been made

### **7.3 TfL response**

We will use the feedback to carry out a lessoned learned exercise to look at how the consultation process could be improved for any future large policy based consultations.

# Chapter 8 - Other issues of relevance to the development of the MTS

## 8.1 Introduction

There are a number of other factors which have a bearing on the final strategy. These include:

- Consistency with other Mayoral strategies – notably the updated population forecasts used in the draft London Plan
- Other updates, corrections and clarifications

## 8.2 Consistency with other Mayoral Strategies

### **The London Plan – updated population and employment forecasts**

The draft MTS stated that London's population was forecast to grow to 10.5 million by 2041. Since publication of the draft MTS, the GLA has published a new 2016-based population projection with a spatial distribution that reflects the new 2017 Strategic Housing Land Availability Assessment (SHLAA) and a new 2017 long term labour market projection. These GLA projections form the basis of the new draft London Plan. Total GLA population growth is greater in the new projection reaching a total of 10.8 million in 2041, with greater growth particularly in outer London. Total London employment is also greater in the new projection reaching a total of 6.9 million in 2041, with greater growth particularly in the CAZ and North Isle of Dogs.

Population and employment are key drivers of travel and TfL examined the impact of these new projections. With the new projections, demand for travel in London is forecast to increase from around 27 million trips per day in 2015 to around 33 million trips per day in 2041. TfL examined the impact of the new projections on the MTS analysis and concluded that if the MTS is delivered an active, efficient and sustainable mode share of 80 per cent in 2041 is achievable.

### **The London Plan and London Environment Strategy – updated emissions forecasts**

Forecast emissions of CO<sub>2</sub>, NO<sub>x</sub> and Particulate Matter have been revised for the final MTS. These revisions align the MTS with the London Plan and London Environment Strategy, reflecting new population and employment forecasts. Emissions forecasts have also been updated based on the results of analysis undertaken for consultation on the Mayor's proposed changes to the Low Emission Zone and Ultra Low Emission Zone.

## 8.3 Other updates, corrections and clarifications

### Mode share estimates

The 2015 mode share estimate for walking, cycling and public transport has been amended from 64 per cent to 63 per cent. The draft MTS specified mode share of walking, cycling and public transport as 64 per cent in 2015. The difference is due to taxi and PHV trips having been included within this category in error. Historically, taxi and PHV trips have been grouped with public transport in TfL's Travel in London statistics. The aim of the strategy is for 80 per cent of trips to be made by active, efficient and sustainable modes. Trips made by taxi and PHV do not typically entail an active travel stage, therefore it would not be appropriate to include trips made by taxi and PHV within the 80 per cent as set out in the mode share aim. The mode share estimate for 2015 has been amended so as to be directly comparable.

### Consistency with TfL Business Plan

The World Class Capacity programme for Tube upgrades on the Jubilee and Northern lines was re-scoped in the latest TfL Business Plan. Figure 26 (Tube Improvement Programme, 2016-2026) has been removed from the strategy as detailed scope and delivery timescales for specific programmes are subject to review in the annual business planning process, and therefore not appropriate for inclusion in a strategic document. The long-term strategic ambition for increasing capacity and improving Tube services remains the same, however, and this change therefore does not require any change to the underlying evidence base.

### Night-time economy

The narrative on the night-time economy has been changed to clarify that night-time services have now been extended to parts of the London Overground network, and to clarify that cultural events such as street closures could be used to activate the night-time economy. While some stakeholders have been named in Policy 17, this list is not exhaustive.

[TfL recommends a change to Policy 17 to clarify that the Mayor will work with stakeholders to seek the development of London's public transport services to support the growth of the night-time economy.](#)

### Minor changes

In addition to the matters outlined above there are a number of minor changes to the Draft MTS. These are described briefly below, although this is not intended to be an exhaustive list.

- Sections which were only relevant to the draft strategy for the purposes of the consultation have been removed, including the stakeholder questions and details of how to respond.

- A number of photographs have been replaced where appropriate in order to better reflect the final strategy. Some figures have been updated to provide further clarity and to correct errors, and the glossary has been expanded to include definitions of more terms.
- As a consequence of all changes there has been some renumbering of sections, Policies, Proposals and Figures within the document.

# Chapter 9 - Next steps

## 9.1 Introduction

This report is the analysis of the issues raised during the public and stakeholder consultation of the Draft MTS. It contains TfL's recommendations for changes to the text of the strategy for the Mayor's consideration.

Copies of all stakeholder representations, and a database of the responses from the public, businesses and other organisations have also been made available to the Mayor.

It is important to bear in mind that the Mayor's Transport Strategy is intended to provide an overarching framework for transport up to 2041. It is a strategic document and does not operate in isolation. There are numerous other Mayoral and TfL strategies, service plans, and local agreements which contribute to the planning, management and development of London's transport infrastructure. Many of these issues raised in the consultation are more appropriate to these documents.

In considering the issues, and making recommendations to the Mayor, TfL has been mindful of the remit of the strategy and sought to focus on the issues relevant to the policies and proposals included in the Draft MTS. This is intended to provide the Mayor with the information he needs in order to understand the range of issues raised by respondents and make a decision on the final text of the strategy for its formal approval and publication.

However, TfL will seek to use the full range of views expressed in other plans and in particular, in future engagement with the boroughs and other partners in the sub-regional planning process.

## 9.2 The Mayor's Transport Strategy

Having completed the public and stakeholder consultation on the policies and proposals set out in the Draft MTS, the Mayor is asked to approve the final text of the Transport Strategy for the purposes of its formal adoption. If he does so the 2010 strategy will be replaced by this revised strategy.

[TfL recommends to the Mayor that he formally approves the proposed final strategy as set out in Appendix A of the Mayoral Decision.](#)