

## Appendix 1: List of respondents to the consultation

Respondent Type	Number of responses
Assembly, GLA Functional Bodies and ODA	6
London Boroughs	22
London political representatives (eg Assembly Members)	3
Transport and environment representative organisations	9
Business representative organisations & Economic and regeneration partnerships	9
Non Departmental Public Bodies	4
GLA Commissions	2
Aviation / motoring organisations	4
Local health/ community representative	1
Partnerships	2
Disability and mobility organisations	2
Other	7
<b>Total</b>	<b>71</b>

Public	6
Businesses	16
Other organisations	4
<b>Total</b>	<b>26</b>

***Statutory consultees (6)***

London Assembly (response delegated to its Transport Committee)\*  
London Development Agency (LDA)  
London Fire and Emergency Planning Authority (LFEPA)  
Metropolitan Police Authority  
Olympic Delivery Authority (ODA)  
Transport for London (TfL)

\* The response from the London Assembly is responded to by the Mayor in his Statement to the Chair of the Assembly (see Introduction). It is listed here for completeness.

***Informal consultees***

**London Boroughs (22)**

City of London  
City of Westminster  
London Borough of Barking & Dagenham  
London Borough of Bexley  
London Borough of Bromley  
London Borough of Ealing  
London Borough of Enfield  
London Borough of Hackney  
London Borough of Hammersmith & Fulham  
London Borough of Haringey  
London Borough of Havering  
London Borough of Hillingdon  
London Borough of Islington  
London Borough of Lambeth  
London Borough of Merton  
London Borough of Sutton  
London Borough of Tower Hamlets  
London Borough of Waltham Forest  
London Borough of Wandsworth  
Royal Borough of Kensington & Chelsea  
Royal Borough of Kingston upon Thames  
London Councils

**London Political Representatives (3)**

Jenny Jones, AM (Green Party)  
London Assembly Labour Group  
London Assembly Liberal Democrat Group

**Transport and Environment Representative Organisations (9)**

Campaign for Better Transport  
East London Line Group  
Energy Saving Trust  
Friends of the Earth  
Living Streets  
London Cycling Campaign

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Railfuture  
Southwark Rail Users Group  
Sustrans

### **Business Representative Groups & Economic and Regeneration Partnerships (9)**

Association of International Courier & Express Services (AICES)  
Central London Forward  
Central London Freight Quality Partnership  
Federation of Small Businesses  
London First  
London Thames Gateway Development Corporation (LTGDC)  
Motorcycle Industry Association (MCI)  
Park Royal Partnership  
South Bank Employers Group

### **Non-departmental Public Bodies (4)**

English Heritage  
Environment Agency  
Highways Agency  
Network Rail

### **GLA Commissions (2)**

London TravelWatch  
London Sustainable Development Commission (LSDC)

### **Aviation / motoring organisations (4)**

Association of British Drivers (ABD)  
BAA Gatwick  
BAA Heathrow  
RAC Foundation for Motoring

### **Local health / community representatives (1)**

Enfield PCT

### **Partnerships (2)**

South London Partnership (SLP)  
West London Partnership (WLP)

### **Disability and Mobility organisations (2)**

Croydon Mobility Forum  
London Visual Impairment Forum (LVIF)

### **Others (7)**

Age Concern  
British Telecom (BT)  
British Vehicle Rental and Leasing Association (BVRLA)  
Institute of Civil Engineers (ICE) London  
London Forum of Amenity and Civic Services  
Port of London Authority (PLA)  
Tandridge District Council

## **Appendix 2: Summaries of responses to the consultation from the Functional Bodies and stakeholders**

### **1. GLA Functional Bodies and Olympic Delivery Authority (5)**

#### **London Development Agency (LDA)**

The LDA welcomes the emphasis on delivering growth identified in the Statement of Intent. It notes the increased emphasis on TfL, the Homes and Communities Agency and the LDA working together in supporting economic and population growth, stating that TfL should be a key partner in investment and regeneration work. The LDA states that the MTS will need to set out which projects are needed beyond 2017 and both the MTS and sub-regional plans should describe the transport needed to support growth in identified areas. More specifically, the LDA states that the transport system must accommodate growth in central London and facilitate outer London realising its full economic potential. The LDA sees the funding of infrastructure to support growth as a key challenge. It states that an efficient logistics sector is the key to supporting London's economy and calls for the Greater London Authority family to provide policy support for the provision of adequate infrastructure and land for the sustainable growth of freight and logistics, including ways to encourage the use of the river and canals for freight movement. It also states that the MTS should advocate regeneration, land-use planning and behavioural change in addition to new infrastructure. Employment variety should be supported in accessible locations close to people with appropriate skills. Regarding the Olympics, the LDA believes that one of the key objectives is to secure and spread the Olympic legacy. The LDA is keen to work with TfL and the London Plan team in developing measures of accessibility to services and facilities, for example via the ATOS (Access to Opportunities and Services) tool. Finally, with regard to electric vehicles, the LDA notes the need for appropriate infrastructure and states that it is investigating whether to become more involved in the issue of supply and demand of energy, and how this might link to work on decentralised energy provision.

#### **London Fire and Emergency Planning Authority (LFEPA)**

LFEPA states that the inclusion of safety in MTS and the focus on reducing congestion are welcomed as less congestion can potentially benefit emergency vehicle response and attendance times. It also states that the role of the Fire Brigade could be highlighted more in the MTS especially in relation to accessibility and Underground stations, with specific mention of fire safety and suitable access for emergency vehicles. LFEPA has made a number of changes to its fleet in order to improve environmental standards related to air quality and CO<sub>2</sub> emissions, and is keen to work with TfL about future Low Emission Zone requirements.

#### **Metropolitan Police Authority (MPA)**

The MPA supports the objective of ensuring the safety and security of all Londoners, and wishes to work with the GLA on reducing crime and antisocial behaviour and improving safety and security on London's transport services. The MPA states that it supports the policy of reducing crime by allocating resources between different policing units and notes that Police Community Support Officers working in the 'Safer Transport Teams' will work

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alongside British Transport Police in achieving these objectives on the public transport system.

### **Olympic Delivery Authority (ODA)**

The ODA comments that the draft MTS should be clear that Olympic events will be held across London, including in central, inner and outer London.

### **Transport for London (TfL)**

TfL states that MTS should be ambitious in seeking to meet the six challenges identified in the Statement of Intent, and that the draft MTS for public consultation will need to provide more detail on specific policy proposals. With regard to shaping the draft MTS, it notes the influence of the Outer London Commission's review and the spatial growth patterns identified in the draft London Plan; as well as the issue of the likely funding available from both public and private sources. In addition to emphasising essential schemes which are already being progressed, such as the tube upgrade and Crossrail, TfL states that the draft strategy will need to set out further investments in order to maximise the benefits of these schemes and should also stress the importance of effective bus services. For bus services, it will also need to set out the relationship between subsidies, fares and levels of service. TfL notes that the MTS also provides an opportunity to set out longer term investment priorities such as the need for additional river crossings in east London, additional rail capacity, and longer term demand management measures.

## **2. London boroughs (22)**

### **City of London**

City of London believes that the Statement of Intent has captured the major challenges, though a greater emphasis on defining their relative importance would be helpful. It considers that consistent outcomes across London are not necessarily appropriate and that London wide and sub regional partnerships can provide a means of coordinating regional and cross-borough schemes providing adequate funding is available. The City of London considers that developing outer London centres based mainly on private vehicle usage is not viable in the long term, and that there is not enough money available to undertake the necessary investment in public transport to provide an orbital network that will support major investment in outer London. It is also concerned that emphasising outer London as the main growth area could affect the transport investment required in central London post 2017, and states that the strategy should set out what investment there will be in this area. City of London states that there is a need for continued transport investment including upgrading the Tube network and infrastructure and the completion of Crossrail; it also considers that projects such as Cross River Tram and the Chelsea-Hackney line will be essential in order to encourage businesses to retain offices in central London and assist with the regeneration of inner London. The City of London considers that new technologies may mean that more selective and sophisticated methods of road pricing may be appropriate in the future. Of the three policy approaches the City is cautious about land use changes and states that priority should be given to providing additional transport capacity and connectivity. It considers demand management may be a useful tool in the short term.

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In terms of other policies, the City would like to see more on reducing traffic congestion, improving radial links, improving journey experience, air quality and the public realm, improving road safety, actual and perceived levels of crime and increasing accessibility. It is particularly keen to see more on safe forms of public transport at night, including more licensed taxis. The City welcomes the measures to tackle climate change, particularly the changeover of the Greater London Assembly family to electric vehicles and the encouragement of cleaner vehicles. It opposes the suspension of Phase 3 of the Low Emission Zone.

### **City of Westminster**

City of Westminster welcomes the broad approach and identifies a number of issues which are particularly important to the borough, including Controlled Parking Zones (CPZs) and the need for them to better meet the needs of residents and local businesses; better co-ordination of street works; the need to convert traffic signalled junctions to include green man phases; stronger emphasis on road safety for pedestrians, cyclists and motorcyclists; addressing the noise impacts of buses and an overall review of the bus network to ensure it is fit for the 21st century, including considering reducing the provision of free travel for children. The City of Westminster welcomes the Cycle Hire scheme and would like MTS to provide guidance to boroughs on improving cycling facilities as well as measures to address unsafe cycling. It also welcomes any reduction in the number of bus services travelling along Oxford Street and considers Legible London information should be provided at all TfL infrastructures and there should be clear policies for improving the public realm, an approach to which the City Council has already shown its commitment. Similarly the City of Westminster welcomes and shares the commitment to electric vehicles, charging points and car clubs. The City of Westminster considers that management of the Transport for London Road Network (TLRN) should be devolved to the boroughs, and in any case there is a need to improve the network. The City of Westminster recognises the need to increase airport capacity and there should be improved Underground and surface rail routes to major airports: the MTS should include a commitment to press the Government and National Rail for investment in this. With regard to the Local Implementation Plans (LIPs) 2 process, the City of Westminster welcomes streamlining of the programme but there should be cost monitoring of project delivery and local transport trends should be monitored in each borough and reported on in TfL's annual reports. The City of Westminster supports land use policies which encourage outer London development centres but since the Central Activity Zone is and will remain the most economically productive part of the Capital, development of road and rail corridors into the centre is imperative. Overall the City of Westminster prefers the option of focussing economic development in the centre. The City of Westminster supports managing demand and smoothing the traffic flow (so long as it does not lead to increased traffic speeds and volumes) by removing traffic signals but notes that TfL does not provide funds to help boroughs do this. With regard to capacity, there is a need to adopt 'capacity spreading solutions' in order to meet increasing population growth and transport demand, including longer Underground operating times, helping businesses to implement home working, underwriting freight consolidation schemes and a graded fare structure to encourage a greater use of spare capacity in the interpeak periods. The City of

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Westminster states the Congestion Charge should operate 7am to 1pm Mondays to Fridays and that there should be 'buffer zones' for some residents once the Western Extension is removed. For improving quality of life, the City of Westminster suggests the following policy priorities: smoother traffic flow; less crowded buses (for example bus route 18); safer cycling conditions; improved Underground stock; extension of Oyster card onto the surface rail network, promotion of the Low Emission Zone and more efficient engine technology and more on-street parking for residents. The City of Westminster notes that Westminster experiences poor air quality and noise nuisance, much of which can be attributed to traffic and congestion and both of which should be addressed in the MTS. Lastly the City of Westminster states that the car when used for certain essential journeys, should be recognised as a sustainable mode.

### **London Borough of Barking & Dagenham**

London Borough of Barking & Dagenham supports the emphasis on developing outer London and states that there needs to be significant investment in transport infrastructure in the Thames Gateway area, including: Dagenham Dock DLR extension; East London Transit Phases 2 and 3; a new Thames Crossing; rail links to Stratford; and improving the flow of traffic on the A13. It also suggests an expansion of the bus network and the introduction of feeder buses to maximise the potential of Crossrail, as well as expansion of walking and cycling networks. There is more scope to use the Thames and other rivers and expand the Thames Gateway ports to include passenger services. In terms of borough funding, there needs to be more certainty around future maintenance funding. It states that there is a need to consider other major policy areas such as the delivery of new homes in the Thames Gateway area, and the need to encourage modal shift.

### **London Borough of Bexley**

London Borough of Bexley considers a specific challenge to be meeting the transport gaps in outer London boroughs without access to the Tube. With regard to the different levels of transport, it considers that local airports have a role to play and that the role of the river in freight distribution should not be underestimated. Bexley believes Local Implementation Plans are the most appropriate way to ensure consistency across London. While it supports polycentric development, 'super hubs' should not be developed at the expense of existing major town centres, such as Bexleyheath, which needs to have better north-south links to the rest of the borough. The first transport priority for outer London would be to link outer London town centres by high quality public transport connections. A polycentric growth scenario is unlikely to have adverse impacts on central London and therefore no particular transport interventions would be required to safeguard central London. In terms of balancing the policy approaches of changes to land-use, managing travel demand and expanding capacity, Bexley states that the key issue is to provide and promote public transport alternatives that will encourage people out of their cars. Providing more comprehensive and reliable passenger information on stations or at bus stops should also be a key priority. Bexley would be pleased to work with the Mayor in promoting electric vehicles though notes that locally there is not yet much demand. Enhancement and improvement of public transport infrastructure in outer London boroughs is the key to a successful shift to more polycentric growth. The London Borough of Bexley does not

support road pricing in principle. Additional transport accessibility is needed in the Thames Gateway region. There should be more extensive use of hybrid and electric vehicles in the bus and taxi fleets. Incentives should be provided for the continued development and use of electric cars. The London Borough of Bexley welcomes proposals on safety and security and climate change and with regard to quality of life and transport for all, Bexley considers that improved and affordable public transport in outer London should be a priority.

### **London Borough of Bromley**

London Borough of Bromley states that MTS should provide more information on how the projections for population, employment and daily trips were calculated. It suggests keeping the MTS at a sufficiently high level that the process of modifying it need not be cumbersome. It states that the role, form and content (and the relationship between) the MTS, Regional Transport Plans and Local Implementation Plans is unclear; it considers that London Regional Transport Plans should remain advisory only. Bromley supports smoothing of traffic and easing of pinch points and would also like to see a review of bus routes, consideration of express buses and extensions to trams and the Docklands Light Railway as well as rail based park and ride within the M25. Bromley does not consider that a greater focus on outer London would adversely impact other parts of the Capital. It does not consider the case has been made for any form of London-wide road pricing and rejects it as a solution for its own borough and states that other demand management proposals should be brought forward, with road pricing only as a last resort. Bromley acknowledges the benefits that new technology can bring, but cautions that the promotion of electric vehicles should try to avoid significant investment in new technologies which quickly become obsolete. The London Borough of Bromley strongly supports the economic development of outer London but urges against concentrating this on strategic outer London development centres. It supports instead the development of all metropolitan town centres. The London Borough of Bromley states that the objective of the strategy should be to work towards removing the real and perceived barriers to greater uptake of non-car modes. With regard to the proposals to tackle climate change, Bromley would like to see explicitly laid out what forms of pricing interventions are regarded as appropriate, and the circumstances in which the Mayor would believe each type of intervention to be justified. The London Borough of Bromley also urges clarity on the CO<sub>2</sub> benefits of each of the proposed measures.

### **London Borough of Ealing**

The London Borough of Ealing states that the Mayor's policies are broadly in line with its own transport strategy (particularly "respecting choice", "Developing Outer London", smoothing traffic flow and improving journey time reliability), and notes that it supports the response of the West London Partnership. With regard to ensuring consistent outcomes across London, the London Borough of Ealing notes that boroughs continue to have flexibility in deciding priorities and that there should be careful scrutiny of the Local Implementation Plans following the issue of the LIPs 2 guidance. The London Borough of Ealing notes that there is no mechanism suggested for dealing with existing pinch points on the road network, for example on the Uxbridge Road corridor which requires land-take for which there is no funding available. It considers that in supporting outer London

development, there will need to be a collaborative approach to bus service planning, in particular to develop express bus services and there is a need for higher investment in transport infrastructure in west London's radial links, as Crossrail will be insufficient according to the modelling shown. In regard to the broad land use options proposed, the London Borough of Ealing states its preference for option 2 – a more dispersed growth pattern – and states that all urban and metropolitan town centres hold considerable potential for economic development. The London Borough of Ealing notes that while the policies set out cover all the priorities, there will always be a need for local prioritisation of schemes and approaches.

### **London Borough of Enfield**

The London Borough of Enfield states that access to healthcare should be included in the evaluation criteria for bus services. It is concerned about car parking space availability in the context of increasing car ownership, and states that a consistent policy perspective should be developed. The London Borough of Enfield would like more attention given to orbital transport, as it believes orbital routes are poor or nonexistent in Enfield and North London. It states that too much emphasis has been placed on radial routes and that reliance on radial networks discourages the development of a polycentric city. The London Borough of Enfield calls for a review of investment in the bus network and also suggests that interchange improvements are important. There is a need to tackle congestion on the road network and it considers that road-based connectivity should be improved by focusing on the development of orbital links through the joining up of existing radial corridors. While calling for a shift in priority from radial to orbital routes, Enfield also believes that improvements to the London-Stansted-Cambridge-Peterborough growth corridor are required to ensure ease of movement to central London and between outer London growth centres. It also considers that there should be investment in new corridors and services particularly to town centres. It calls for the recognition of the Upper Lee Valley as a strategic corridor. Enfield opposes any further increases in the fiscal burden on motorists but suggests that certain specific and clearly defined demand management proposals may be considered to keep traffic moving. Enfield states that every effort should be made to maximise the potential of Intelligent Transport Systems to make travel safer and more efficient. With regard to land-use options, Enfield strongly favours a dispersed growth scenario and supports the development of 'outer London strategic growth corridors', which it states have the potential to reduce the need to travel in to central London. Enfield welcomes the intention to promote economic growth in outer London but states that this should not be at the cost of generating additional car trips and congestion in outer London.

### **London Borough of Hackney**

London Borough of Hackney supports measures to reduce the need to travel and supports the use of a road user hierarchy and road space reallocation to encourage the use of more sustainable modes. It supports smoothing traffic flows as long as it does not generate additional traffic growth and would like to see mention of the Principal Road Network. It would like the Mayor to consider a 20mph limit and the use of average speed cameras for residential roads and encourage boroughs to consider traffic-free zones. The London Borough of Hackney states that there should be a focus on road safety initiatives in areas of

high deprivation and also a focus on providing access from deprived areas to employment opportunities. It is keen to secure interchange improvements between Hackney Central and Hackney Downs stations, and, in the longer term, Crossrail 2. It strongly supports measures to encourage walking and cycling and states that the cycling target is too modest and should differ between inner and outer London. Hackney also supports greater use of the River, but states that interchange with other modes is important and suggests looking at making use of other waterways in London. With regard to parking, the London Borough of Hackney states that differential charges should be used to encourage less-polluting vehicles and there should be some alignment of London parking policies and notes that changes to land-use and employment could lead to more parking demand in outer London. The London Borough of Hackney welcomes electric vehicles, but notes that the energy source should be renewable and the overall volumes of traffic should not increase and that policies associated with these vehicles will need to be kept under review and boroughs must have control over how charging points are introduced. The London Borough of Hackney believes that road pricing has a role to play in reducing the impact of through traffic on its residents.

#### **London Borough of Hammersmith & Fulham**

London Borough of Hammersmith & Fulham states that the west London boroughs do not support the concept of outer London development centres and notes that there is potential to develop Brownfield sites in the inner boroughs where it would be more efficient to improve existing transport links. Hammersmith & Fulham identifies improving the District Line as an immediate priority, while Crossrail 2 would help relieve congestion in the longer term. With regard to managing demand, the London Borough of Hammersmith & Fulham is not opposed to road pricing at congested times and locations but states any scheme must be sophisticated, avoid adverse boundary effects and must be in the context of good public transport alternatives. Hammersmith & Fulham states that electric vehicles have a limited role to play but suggests that electric buses and freight vehicles might be viable, and that Liquefied Petroleum Gas (LPG) powered vehicles should be encouraged in the context of improving overall existing vehicle technology. Hammersmith & Fulham advocates traffic signal technology and in-vehicle information as a way of smoothing traffic flow. It considers quality of life and safety could be improved by making London's streets more 'liveable', for example by reducing air pollution and aircraft noise and encouraging more people to use streets. It suggests targeted interventions to improve road safety, such as resolving the conflict between Heavy Goods Vehicles (HGV) and cyclists. In promoting transport for all, it says step-free access at major interchanges should be a priority and smaller buses, with shorter routes, should be considered. With regard to boroughs' duty to deliver policies set out in the MTS, the Hammersmith & Fulham suggests that boroughs should produce short annual reports on what they are doing, and TfL management should be light touch. It would like the mayor to make a commitment to extending the curfew on night flights at Heathrow beyond 2012 and also to support Old Oak Common as the location for the high speed rail hub for this airport.

#### **London Borough of Haringey**

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The London Borough of Haringey states that the policies in the Statement of Intent are broadly in line with its own for land use and transport planning, including reducing the need for travel, supporting public transport and the promotion of sustainable modes such as walking and cycling. Haringey supports the focus on developing outer London town centres and encouraging employment growth there, identifying Tottenham Hale and Wood Green as local centres and Haringey Heartlands as an area of intensification. It identifies a need to address capacity issues particularly in the north east corridor, and welcomes recognition of the need to improve orbital transport and links to town centres in outer London. It considers there are problems of crowding on public transport and road congestion locally and states that road pricing should be considered as part of an overall strategy for outer London centres. While the Haringey supports the approach of encouraging people to choose sustainable modes, it considers there is also a role for formal road space allocation to achieve this. Haringey supports cycle highways in principle but would like more engagement on this; it also supports car club bays, electric vehicles and railway electrification.

### **London Borough of Havering**

The London Borough of Havering identifies two additional challenges for the MTS to address: the growth of an ageing population and achieving higher levels of travel awareness by everyone in the community so that people can be encouraged to adopt sustainable travelling habits. It welcomes closer TfL engagement with highway authorities outside London and suggests that, with regard to borough implementation of the strategy, it would be logical to publish London-wide monitoring results annually, including results at borough and sub-regional level, although the need for local prioritisation should be acknowledged. Havering, however, does warn that the new local flexibility, entwined with the new strategy, could lead to uneven progress towards achieving MTS objectives. With regard to future land-use planning, it favours an approach which rejuvenates outer London through concentrating on growth corridors. For Havering this would be north-south orbital links as well as radial links - for example the Crossrail Corridor and the Riverside Corridor. It identifies the Romford Gateway project, which is a new interchange to adjoin Romford Station, as a priority, as well as reiterating the need for an extension of the East London Transit toward Rainham and Romford and the provision of a new station at Beam Park and capacity enhancements on the Tilbury Loop line. It also notes the regeneration project providing a 'learning village' at Harold Hill, and the planned access improvements there. To support outer London development, it advocates more use of Urban Traffic Control and Intelligent Transport Systems to smooth traffic flow around town centres, real time information at all bus stops and enhanced pedestrian and cycling linkages from developments to open and leisure areas. With regard to road pricing, it states that this should not be introduced in more areas of London unless the relevant boroughs are supportive; it is concerned that road or parking charges do not act to make outer London locations less competitive compared to sites outside London. It states that electric vehicles have a role but has concerns about sourcing renewable electricity, the provision of charging points and that 'free at point of use' charging facilities will have to be paid for by local authorities. Havering notes that the regeneration of Thames Gateway has been identified

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as a priority in the London Plan and that there is a need to maximise the benefits of transport schemes such as Crossrail. It states that additional connectivity and capacity enhancements should be focussed on sustainable transport corridors in outer London. Finally, it concludes that management of the road network for all users needs to be made clearer on what it means in practice.

### **London Borough of Hillingdon**

London Borough of Hillingdon states that there is under provision of public transport links between the north and south of the borough, which has adverse impacts on access to employment and opportunities for modal shift from the private car. It also states that there is a lack of accessibility to Uxbridge. Hillingdon would welcome a fast link from High Speed 2 rail services to Heathrow airport, and states that Heathrow should be treated as a special case of international importance rather than as a local super-hub. Hillingdon welcomes the Mayor's opposition to further expansion of Heathrow but, even without expansion, considers there is a need to address the congested routes to the airport and the negative impacts on air and noise pollution. Hillingdon is concerned about poor air quality locally and notes that the numbers of Light Goods Vehicles are projected to grow and without Phase 3 of the Low Emission Zone, there is a need to find another approach to managing emissions from this source; it also notes the potential adverse impact on air quality of the removal of the Western Extension of the Congestion Charging zone. The London Borough of Hillingdon states that MTS should ensure that the mandatory legal limits for local air quality pollutants are met. With regard to monitoring the boroughs' implementation of the MTS, The London Borough of Hillingdon suggests that the Mayor could specify a number of performance indicators, which should include measurement of CO<sub>2</sub> emissions. It also suggests a borough wide carbon footprint monitor. Hillingdon identified two specific opportunities for encouraging more sustainable travel locally: an upgrade of Uxbridge station and a number of routes for express bus services. It also states that most of the interchanges in Hillingdon need upgrading. The London Borough of Hillingdon supports the aim of improving the public realm and would like better walking and cycling links to its town centres. However, it does have concerns about the practical installation of additional dedicated cycle routes along Hillingdon's arterial routes and think the Grand Union Canal could be developed as a major pedestrian/cycle facility. In addition, Hillingdon would be keen to act as a pilot for any carbon-trading scheme for aviation and surface transport. Hillingdon suggests a review of Dial-a-Ride and offers to act as a pilot for the rationalisation of mobility impaired travel. With regard to future land-use options, Hillingdon states that existing town and district centres should be considered as more important than promoting new 'super hubs' in outer London.

### **London Borough of Islington**

London Borough of Islington states that the MTS should identify key regeneration opportunities in London with a view to working with boroughs to prioritise the transport investment that would help to realise these opportunities; it would also like more attention given to the needs of mobility impaired people, including a review of door-to-door travel; and more information on proposals to potentially devolve certain responsibilities for the Transport for London Road Network (TLRN) to the boroughs. Islington sees improving the distribution of freight around London as a key priority. It supports the use of new

technologies but believes that walking and cycling and high-density mixed-use developments are the best means of reducing the environmental impact of travel. With regard to the spatial approach proposed, the London Borough of Islington considers there is not sufficient emphasis to the many local journeys made, particularly on foot or by bicycle. In implementing the strategy, TfL should agree a strategic investment framework with the boroughs and a limited number of performance indicators and targets should be set (and included in boroughs' Local Implementation Plans), but boroughs should then have absolute discretion as to how these were achieved; borough funding should take the form of an equal payment for all plus a further payment to be based on performance. The London Borough of Islington states that the Mayor must set challenging targets for reducing demand for motorised travel and increasing the proportion of walking and cycling trips. It says investment in outer London should not be at the expense of investment in inner and central London and the London Borough of Islington remains unconvinced about the benefits of directing employment growth to outer London. In line with this view, it prefers the broad land-use transport option 1: the focus of economic development in central London. Islington would like the Mayor to examine the introduction of a London-wide road user charging scheme. Working with the boroughs, there should be action to improve road safety and there should be a greater range of policies to address climate change and deliver a more sustainable transport system. With regard to local transport, the London Borough of Islington sets out priorities for the short, medium and long term in the borough. Among the first tranche are improvements to Highbury and Islington Station, removal of the gyratory at Highbury Corner and an interchange for Crossrail and Thameslink at Farringdon. Over the next five to ten years, the London Borough of Islington would like to see improvements at Old Street and Archway and increased connectivity through and to large scale social housing estates; beyond this it lists the implementation of proposals for Holloway Road/Seven Sisters, Cross River Tram, Crossrail 2 and rail improvements to reduce demand for short haul flights.

### **London Borough of Lambeth**

London Borough of Lambeth states that the MTS should contain specific targets, for example for increased cycling and reduced traffic, and that the Strategy should focus on increasing the capacity and frequency of public transport services. The London Borough of Lambeth is concerned that there is a move away from a road user hierarchy, and states that there should be more emphasis on road safety and a 20mph speed limit on all roads. Lambeth supports improving rail connections as an alternative to air travel, supports road pricing in principle if certain conditions are met and considers the detrimental effects of a new airport including air quality, noise, climate change, outweigh the potential benefits. Lambeth states that the strategy should prioritise projects in areas with high stress levels and describes a number of schemes that would benefit the borough: Cross River Tram (or its alternatives), extensions to Tramlink and East London Line, and improvements to capacity at Vauxhall, Waterloo and on the Victoria Line. It also states that the borough requires significant improvements in orbital east-west rail and bus service provision and refers to extensions to the East London Line as a possible scheme. The London Borough of Lambeth advocates a new Brixton rail station on the East London Line extension but

opposes the Thameslink Blackfriars proposal. The London Borough of Lambeth is keen to prioritise sustainable modes of travel and reduce private car use and notes that growth in outer London must be accompanied by public transport provision, walking and cycling. It advocates holistic area based schemes in outer London, complemented by robust smarter travel programmes, to stimulate shorter trips and alternative modes to the car. The London Borough of Lambeth acknowledges the role of technology in improving services (eg iBus, Countdown) and welcomes electric vehicles while noting that they also cause parking stress and road safety problems; it suggests that there should be an emphasis on shifting fleets to electric rather than just creating additional electric vehicles. The London Borough of Lambeth promotes a road danger reduction approach locally and urges the Mayor to adopt this; and also notes that fear of crime can be a barrier and measures such as staffed stations can address this. It says transport should enable people to access key services like health, education and employment as well as providing employers access to labour markets and freight movements.

### **London Borough of Merton**

London Borough of Merton favours polycentric growth and believes there should be investment in orbital services in addition to extra capacity on all transport networks. Merton considers the Croydon Tramlink extension should go ahead and there should be a tram extension through Mitcham town centre, and in addition National Rail's proposal to stop the Wimbledon loop at Blackfriars should be challenged. It notes that Oyster Pay As You Go (PAYG) should be extended to the wider south area, as well as continual improvements in the Underground service such as reliability, and regeneration and capacity enhancement of Morden Underground station and town centre generally. Merton states that buses have an extensive role to play in the shorter term to accommodate future growth and to improve orbital services and cross boundary trips. It supports more flexible car parking standards where there is poor public transport accessibility, and supports road pricing policies and electric vehicles alongside a reduction in non essential car trips generally. The London Borough of Merton supports the removal of dysfunctional gyratories and unnecessary signalised junctions, improved urban realm, including mixed priority spaces, and optimisation of airport links and capacity.

### **London Borough of Sutton**

London Borough of Sutton states that MTS should contain overarching policies with which boroughs must comply whilst allowing flexibility to adapt policies locally. The London Borough of Sutton considers demand management to be a policy priority, which will include some elements of land use planning. It considers there will be a need for some expanded public transport capacity in outer London including more emphasis on using the Thames and canals, but additional road capacity should be avoided. Sutton supports polycentric development over the development of 'super hubs'. It considers greater capacity and frequency on suburban rail, particularly in south London is needed, as well as improved bus priority and frequency, especially during the off peak and more late night services. Sutton also supports a future Tramlink extension to Sutton; improved interchange between public transport modes and better access for freight vehicles. It opposes the third runway at Heathrow and instead supports measures to high speed rail alternatives. The London

Borough of Sutton believes major interventions are needed to achieve a 'step change' in cycling and walking facilities. With regard to road user charging, it suggests that a sophisticated system which reflected traffic conditions and other factors could be rolled out across London, focussing on congestion hot spots and busy times of day, with funds ring fenced for transport improvements and a proportion going to the relevant borough. Sutton also considers that if car use increased in outer London as a result of economic development, road pricing may be necessary. Sutton says boroughs can encourage and facilitate electric vehicles by the provision of charging infrastructure and parking concessions. Other policies Sutton would like to see included in the MTS include: powered two wheelers, water transport, parking, car clubs, leisure and tourist transport requirements, the need for a 24 hour public transport system, a potential one-hour bus ticket and a greater emphasis on Smarter Travel.

### **London Borough of Tower Hamlets**

London Borough of Tower Hamlets states that there should be quantifiable measures for tackling climate change in the MTS and more emphasis on the integration of land-use and transport policies. Tower Hamlets would like more detail on ensuring the affordability of public transport fares and reassurance that step-free access to railways is achieved in a shorter timescale. It also states that the access needs of the mobility impaired should be considered in public realm and public transport improvements. Tower Hamlets would like a London tram network to relieve overcapacity on bus routes, more use of the river and a further river crossing and welcomes the cycle hire scheme and cycle superhighways, though it has concerns about the proposed route of the pilot superhighway that goes through Tower Hamlets. Tower Hamlets is concerned about the removal of articulated buses and considers the New Bus for London should have more space for wheelchairs and pushchairs. It welcomes the emphasis on electric vehicles but questions some of the delivery plans. While Tower Hamlets welcomes Crossrail it notes the potential adverse impact of the levy and says Crossrail 2 should interchange with Hackney Wick stations and states that it has had discussions about the possibility of an enhanced interchange at Hackney Wick to support regeneration and relieve crowding elsewhere. It has also been looking at the potential for addressing the 'barrier' created by the A12.

### **London Borough of Waltham Forest**

London Borough of Waltham Forest welcomes plans to expand transport capacity but would like MTS to tackle the need to reduce car dependency in outer London, for example by road pricing and the use of parking charges as well promoting sustainable modes. The benefits of traffic smoothing measures must be used to give more capacity to buses, pedestrians and cyclists and not to encourage car use. Waltham Forest supports polycentric development but says the initial emphasis should be on expanding capacity and managing demand, with changing land-use as a longer term goal. It has reservations about airport expansion and favours high-speed rail alternatives to air travel. It states there should be more focus on achieving social and regeneration goals through transport, enabling access to jobs and services regardless of access to a car. The council is drawing up a proposal for a Chingford to Stratford rail line. The London Borough of Waltham Forest would like to see more attention given to climate change and a consideration of this issue

alongside air quality and measures to meet limit values in the absence of Low Emission Zone Phase 3. Waltham Forest is concerned that small, local trips might be overlooked in the framework and has concerns about the funding process for boroughs; it is also concerned about its location within the sub-region. The London Borough of Waltham Forest considers it is important not to overstate the case of technological solutions and recognise that they will not work without behavioural change.

### **London Borough of Wandsworth**

London Borough of Wandsworth considers that the greatest challenge for the MTS to address will be the gap between projected and target CO<sub>2</sub> emissions, and while it is supportive of the policy approaches set out in MTS, states that it would be unwise to rely on technological fixes when behavioural change and demand management approaches are more under the Mayor's control. It states that Local Implementation Plans guidance should not be over prescriptive and the borough councils should be key consultees in developing Regional Transport Plans. Overall, it thinks the focus of the MTS should be on demand management and provision of more public transport capacity, particularly extensions to the Tramlink and enhancing capacity on south west radial routes and more investment in Nine Elms and Battersea. It considers orbital routes between new outer London destinations will also be needed and extra highway capacity could be considered to alleviate stress on key bus corridors and provide more space for pedestrians and cyclists. Wandsworth states there should also be an emphasis on enabling people to live, work and shop locally wherever this may be and that even if further growth in outer London is prioritised, there will still be the need to meet strong demand for transport to and from Central London, because of existing business, tourism and leisure activities. The London Borough of Wandsworth supports the consideration of pricing options if they are the best means of managing demand and do not harm economic vitality; schemes should be revenue neutral, fair, and with the revenue ring-fenced for transport improvements. Pricing might also be acceptable for the use of specific new infrastructure such as a road or a bridge. It also states that new mechanisms to raise funds are needed. The London Borough of Wandsworth is supportive of Airtrack, but not capacity expansion at Heathrow, and identifies enhancing the urban realm, action to reduce road casualties and the removal of real and perceived barriers as priorities. With regard to electric vehicles, the London Borough of Wandsworth states that since the technology is developing rapidly, there should be care about supporting measures that could soon become obsolete.

### **Royal Borough of Kensington & Chelsea**

Royal Borough of Kensington and Chelsea states that there is a need for a full review of bus network, a review of the cost of public transport fares, a long-term commitment to the Chelsea-Hackney line (Crossrail 2), more step-free access and better use of existing infrastructure, for example having more entrances to tube stations and increased frequency on the Circle Line. Kensington and Chelsea favour a dispersed growth scenario and advocate an orbital rail network. With regard to new technologies, it advocates better provision of information to help modal shift as well as using technology to reduce air and noise pollution. It considers electric vehicles have a role but has concerns about parking stress, the impact of charging points on streetscape (these should be off-street) and the risk

of encouraging car use at the expense of more sustainable modes. The Royal Borough of Kensington & Chelsea states that road pricing may be appropriate in managing demand but must be sensitive and not penalise very short trips, encourage increased driving or displace traffic onto side roads. It welcomes the development of hybrid vehicles, particularly buses, and states that all buses should have mandatory speed limiters. In terms of TfL working with boroughs, the Royal Borough of Kensington & Chelsea states that there should be monitoring of outcomes rather than consistent progress, since the need for particular improvements is not uniform across London. It hopes that TfL will address the issue of the Earls Court one-way system. It would like West London Line services to Gatwick Airport to be restored, a station reopened in the North Pole Road area, a Crossrail station near Ladbroke Grove and the Crossrail 'turnback' facility from Westbourne Grove relocated to North Kensington.

### **Royal Borough of Kingston upon Thames**

Royal Borough of Kingston upon Thames supports polycentric development and considers Kingston Town would be an ideal strategic outer London development centre. It says there is a pressing need for improved orbital transport links and increased service frequencies in south west London and around Kingston Town in particular - including links to centres outside London, to airports and the Channel Tunnel as well as the reclassification of Kingston and Surbiton stations to Zone 5. The Royal Borough of Kingston upon Thames would like to see more emphasis on Smarter Travel, bus priority, accessibility (and affordability) of public transport, better integration of transport modes and funding for road maintenance. It also suggests investigating opportunities to extend the Low Emission Zone. The Royal Borough of Kingston upon Thames would like TfL and the boroughs to develop five-year transport infrastructure plans. It would like to see cycling schemes extended to outer London and considers that road pricing should only be considered where there are sufficient public transport, walking and cycling alternatives to car use. The Royal Borough of Kingston upon Thames states that electric vehicles have a role to play in reducing air pollution and should be subsidised, but overall there should be a preference for shifting away from private vehicle use, and the bus fleet should be made more environmentally friendly. The Royal Borough of Kingston upon Thames would strongly oppose any reduction in bus services and says there should be more consistent parking policies across borough boundaries. It considers there should be equal priority given to investing in orbital transport in inner and outer London, and that real-time travel information and signage could help to smooth traffic flow.

### **London Councils**

London Councils supports the development of outer London around existing town centres rather than a few 'strategic outer London development centres' and states that there is a need to improve orbital public transport in outer London and connections to centres beyond the Capital's boundary. It also states that transport improvements should be focused on high growth areas and areas of deprivation. London Councils states that the draft MTS should set out clearly which schemes are funded, timescales and costs for new proposals and estimates of funds available. MTS needs to be explicit about how the Regional Transport Plans will be used for this, and may require a resetting of the Local

Implementation Plans process timescale. London Councils also believes that the MTS should set out priority unfunded schemes and states that Crossrail 2 and a new Thames Crossing would be its priorities. London Councils would like assurance about funding for maintenance of the road network and a full strategic review of the bus network, involving the boroughs, to include ticketing options, use of smaller vehicles and shorter routes. Linked to this, London Councils believes that there should be more focus on local journeys and measures that encourage walking and cycling. Non-car based transport should be planned for in all new development. The Strategy should encourage people to make Smarter Travel choices following a sustainable hierarchy of transport modes; London Councils would like a review of the approach to road safety and traffic calming schemes and states that this would help support the planned increase in walking and cycling. London Councils calls for a London Walking Plan and stronger support for car clubs. With regard to road pricing, London Councils states that it would like to see a set of clear objectives for congestion charging and a framework for developing options which would fully involve the boroughs, and set out safeguards for any borough-led consultation on road pricing proposals. London Councils welcomes initiatives to address climate change, particularly encouraging fuel-efficient driving and influence modal choice, but wishes to know how the Mayor will determine if current approaches are sufficient. Similarly, London Councils would like the Mayor to outline what steps he would take to tackle the issue of London not meeting air quality targets. London Councils supports electric vehicles as long as they do not add to parking pressures and congestion and do not detract from the encouragement of walking and cycling. With regard to transport opportunities, it suggests that a more flexible approach may be taken to accessibility, but there should be prioritisation of step-free access at major interchanges, and affordability of public transport is also important. London Councils notes south London's dependence on National Rail networks and states that the Strategy should contain measures for further integrating the rail network into the London system, and developing a common fares policy. Finally the MTS should make clear how it will take into account changes in health, education and business policy.

### **3. London political representatives (3)**

#### **Jenny Jones, AM (Green Party)**

Ms Jones states that MTS should outline how boroughs will be supported to conduct and evaluate pilot schemes that have been developed to help meet the goals set out in the Strategy. Ms Jones also states that there is a challenge in marrying localism with strategic goals and there is a need to ensure big priorities such as cycling are delivered locally and boroughs and TfL should identify sub-regional problems and target resources at them. Ms Jones considers MTS needs ideas on how to increase capacity or reduce demand and should reinstate various cancelled schemes such as Greenwich Waterfront Transit and help to reduce the overall levels of traffic. She also states there needs to be more promotion of public transport, walking and cycling, air quality and to improve the feel of the city, and is opposed to the removal of the Western Extension Zone as it will lead to increase in traffic and air pollution. Ms Jones states that cycling could have a major role in outer London for

short trips and also that there is no clear plan for cycling in the suburbs. She believes that 20mph zones will help increase cycling and that these should be implemented on all residential roads in London. Ms Jones states that there is also a need for large scale investment in walking such as Legible London, traffic free zones, signage, infrastructure for pedestrians and that delaying Phase 3 of Low Emission Zone will be a backward step for air quality. Ms Jones also notes that parking standards should be tightened and that car free developments should be set up in areas with good public transport. Ms Jones considers there should be greater clarity over options for reducing traffic demand through road and parking pricing. Ms Jones also identifies a need for more freight measures especially on light goods vehicles and no expansion of aviation capacity. Ms Jones states plans for step-free access should be reinstated and there should be a reduction of energy use on the Underground and rail, as well as stating the need for the TfL fleet to be hybrid before progressing to zero carbon by 2025. In terms of land-use planning, Ms Jones advocates the dispersal of economic activity to centres of inner and suburban London, but the shift to a more polycentric city should not be done at the expense of investment in the Thames Gateway. Ms Jones adds that these policies will require employment centres outside central London to have better public transport, including orbital links. Light rail and transit should be considered for many areas of outer London and Ms Jones advocates a web-like rail network. Ms Jones opposes any new bridge or tunnel at Silvertown, a New Gallions Reach Bridge, and improvements to the Dartford Crossing.

### **London Assembly Labour Group**

The London Assembly Labour Group states that the Mayor should set out a longer-term vision for transport in London, which would include reinstating schemes such as Cross River Tram, East London Transit, Greenwich Waterfront Transit and extensions to the DLR and Tramlink. It also states that further tram options for outer London should be explored, that there should also be a commitment to Crossrail 2, High Speed 2 and further Underground extensions including the Northern Line to Battersea and the Bakerloo Line to Camberwell and Catford. It is opposed to any airport expansion. The London Assembly Labour Group calls for more public transport investment along outer London 'growth corridors' and at town centres such as Croydon, Brent Cross and Dagenham. There should be more emphasis on climate change in the strategy and ways to improve London's air quality, in particular by decreasing car use, for which there should be a specific TfL target. Electric vehicles are to be welcomed but are a small proportion of the overall fleet and their energy needs to come from renewable sources; it is also important to encourage other forms of transport to reduce their emissions. The London Assembly Labour Group says step-free access must be given a higher priority and is concerned that smoothing traffic flow means that car users have a higher priority than pedestrians and could reverse the achievements made in reducing car use. The Assembly Labour Group also notes that traffic light rephasing must always ensure that there is sufficient time for pedestrians to cross the road. There needs to be greater investment in walking and cycling: addressing problems of pedestrian congestion in London and ensuring shared space is acceptable to disabled people; setting a higher target for cycling; a 20mph default speed limit and removal of gyratories and guard rails. The London Assembly Labour Group encourages the Mayor to

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lobby for greater control over the National Rail network and an equalisation of fares on the Overground and Underground as well as further electrification of rail lines and action to address pinch points. On buses, it calls for a full review of the bus map, more bus lanes and bus priority measures, a consideration of how to provide express routes and 'hail and ride' services in outer London and expresses concerns over the safety of the 'new Routemaster.' The London Assembly Labour Group calls for coordination of complementary transport services such as Dial-a-Ride, Taxicard and local community transport services and would like competitively priced fares and a commitment to continued concessionary fares and passes; better information provision to travellers and more investment in Legible London and Way Finding. The London Assembly Labour Group highlights a number of ways to address the needs of freight and business operators, including use of waterways, use of cleaner vehicles, better loading and unloading arrangements and promotion of freight by rail. There should be greater use of London's rivers and canals, improved river crossings including a reinstatement of Thames Gateway Bridge or a new crossing for the area; there should be measures to improve the environmental performance of taxis; motorcycle safety and parking should be improved and quieter and cleaner motorcycles should be promoted. The London Assembly Labour Group is concerned about the congestion and air quality pollution effects of cars and states that there should be an overall reduction in car reliance and the need to travel, and supports measures such as congestion and road user charging as well as incentives for using sustainable modes and car clubs. The London Assembly Labour Group states that in MTS there should be plans for transport to support London's regeneration, with the focus of investment being on car dependent communities. There should be incentives and technological support to help change travel and working patterns. Public transport services should be improved at weekends and there should be incentives and better parking provision for visitor coaches.

### **London Assembly Liberal Democrat Group**

The London Assembly Liberal Democrat Group states that the MTS should set out which schemes have been funded, which are in development and which the Mayor intends to re-introduce at the end of the current ten year investment cycle, including a consideration of how to secure alternative funding for schemes such as Cross River Tram. The London Assembly Liberal Democrat Group states that all cancelled schemes should be retained for consideration in future spending reviews and states that the Mayor should cease work on the Thames Estuary airport scheme. The London Assembly Liberal Democrat Group identifies as its first priority the funding gap for upgrading the Tube, including accessibility enhancements which should be prioritised at London's most popular visitor attractions; the second challenge is funding Crossrail 1. The London Assembly Liberal Democrat Group would like to see more detail on encouraging people out of their cars and reducing the need to travel and notes that measures to promote cycling and walking can be very cost-effective. It suggests the wider roll-out of personalised travel plans. The London Assembly Liberal Democrat Group supports the development of outer London, connecting town centres, and notes that situating employment, housing and services close together can help reduce the need to travel. As an example, it suggests that more housing should be provided in the Docklands. It also states that the development of outer London centres requires

considerable improvements to public transport and walking and cycling along orbital corridors. It is not convinced by the chordal link proposals, and thinks a London-wide car club should be considered, and it calls for the introduction of express coach services in outer London such as between Woolwich and Croydon. It also advocates the Fastbus scheme proposed between Wembley and Ealing. With regard to road pricing, the London Assembly Liberal Democrat Group says that boroughs should be invited to identify 'hot spots' with a view to developing tag-and-beacon congestion charging schemes. To improve quality of life for Londoners, it suggests that there needs to be action on air quality, including the pedestrianisation of more of central London, and that a one-hour bus ticket would help to improve fare affordability. It considers there is scope to 'green' the fleet, including diesel buses, taxis and rail trains, and the next stage of the Low Emission Zone should be implemented. The London Assembly Liberal Democrat Group opposes the third runway at Heathrow and supports High Speed 2. To improve safety and security, it states that there should be high visible policing on streets and the transport networks. It states that TfL should be more open with the boroughs and other stakeholders and publish information about how decisions are made, for example on bus routing. The London Assembly Liberal Democrat Group also advocates further development of freight consolidation centres, the promotion of electric vehicles for deliveries and greater use of the Thames for both freight and passengers. Lastly, it states that Dial-a-Ride needs to be improved and that bus costs need to be reduced.

#### **4. Transport and environment representative organisations (9)**

##### **Campaign for Better Transport**

The Campaign for Better Transport states that for CO<sub>2</sub> reduction to be successful there needs to be a consistent message regarding traffic reduction; promoting active and 'healthy' travel; reducing the need to travel and improving air quality and the public realm. It notes that the Accessibility Plan is also an opportunity to help reduce the need to travel. The Campaign for Better Transport also states that there is concern over car traffic and congestion especially if 'super hubs' are pursued and to help remedy this Smarter Travel and travel plans should be increased. It states that there should be road pricing as well as an enhanced public transport system and improved public realm to encourage use of other modes. The Campaign for Better Transport also states that car parking and new road standards must be more rigorous and there should be the establishment of exemplars of low car dependency areas or transport eco-quarters in order to persuade people out of cars. The Campaign for Better Transport also states that local employment, working from home and raising demand for local services should be encouraged in order to reduce the need to travel. The Campaign for Better Transport states that they support consolidation centres for freight and appropriately sized vehicles as well as an integration of transport and land use policy for the purpose of traffic avoidance.

### **East London Line Group**

The East London Line Group states that there should be more orbital to outer services with improved frequencies and capacity. The East London Line Group also states that there should be an identification of greater opportunity for higher density spatial developments in the neighbourhood of orbital railway stations. The East London Line Group is concerned about the focus on outer London, as it risks ignoring the need to redress social and regeneration shortcomings in inner London. The East London Line Group wants the consequences and timescales of new elements of the MTS to be outlined, as well as stating that each sub-region should be able to fine tune spatial and transport options.

### **Energy Saving Trust**

The Energy Saving Trust strongly supports the promotion of cycling and suggests the following measures to support this: traffic-calming measures; provision of parking and storage facilities; and separate cycling paths and rights of way. It states that new developments should be mixed-use and restrict car parking spaces in favour of cycle spaces and that cycle highways should be well-lit to encourage use. It also supports Smarter Travel initiatives and better provision of information to encourage people to use public transport. The Energy Saving Trust says pricing mechanisms should be used to incentivise the choice of more sustainable and low carbon modes of travel, and while it strongly supports the uptake of electric vehicles, notes that there are a number of barriers and that tariffs should be set to encourage re-charging at off-peak times.

### **Friends of the Earth**

Friends of the Earth states that alternatives to cars need to be sufficiently available in order to encourage mode shift however this will require funding and road space priority, and greater clarity is requested over the Mayor's CO<sub>2</sub> targets. Friends of the Earth also states that they like the idea of reducing the need to travel and believe value for money is key but only where it contributes to environmental goals as well. It states that reduced traffic levels must be achieved by whatever means necessary. Friends of the Earth considers that sustainable development and better integrated land use planning must underpin the whole London plan, and that targets for climate change and air quality need to be based on science and adapted when necessary as well as contributions from each sector being specified. Friends of the Earth also state there should be a presumption against aviation growth; accessibility should be improved for local people without contributing to climate change and that there should be a diversification of London's economic base and expansion of 'green' jobs. It also states that the use of existing public transport and the river should be maximised, and that there should be a recognition that green areas and open spaces have a part to play in improving health.

### **Living Streets**

Living Streets states that journey length reduction and demand management are needed; however there should also be a shift to sustainable modes and this commitment is absent from the Statement of Intent (Sol). It states that measures for reducing motor vehicle use and modes that are not economically productive need to be enacted in order for smoothing traffic and demand management to be successful. Living Streets also states that Local

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Implementation Plans (LIPs) funding for town centre improvements should include explicit requirements that a certain proportion is allocated to walking and public realm improvements. Living Streets says that there needs to be more explicit proposals to smooth the flow of people on foot and treat pedestrians as part of traffic - which links into support for shared space and taking into account the needs of disabled people - all as part of traffic smoothing. It considers modal shift in relation to climate change should be a primary policy initiative, serious and proactive measures are needed in order to shift London's travel patterns in favour of less polluting public and active travel needs. Living Streets also states that 20mph speed limits on restricted roads should be added to Safety and Security and Quality of Life priorities as well as stating that modal shift should be considered in terms of air quality as well as CO<sub>2</sub>, and that it should be noted that electric vehicles still have a large carbon footprint and contribute to congestion. It believes that new technologies are not a panacea and there needs to be a range of measures to tackle challenges such as climate change, including a shift to sustainable and public transport modes and a gradual shift to more environmentally friendly vehicles. Living Streets also states that road pricing is suitable for urban and national networks as well as city centres, and that it should be used to encourage people to undertake journeys in ways that are most sustainable and less likely to add to congestion, as well as managing demand.

### **London Cycling Campaign**

London Cycling Campaign (LCC) states that the modal share target for cycling should be ten per cent by 2026; that the health sector should match the funding that TfL puts into cycling and walking and policies should help to attract and support new cycle users in order to help reach the target for increased mode share. LCC also states an effective system of road pricing should be implemented beyond the current Congestion Charging Zone, but believes there should also be continued integration of transport and land use planning as well as more speed enforcement and reduction policies. LCC states that motorbikes on bus lanes can have a negative impact on the safety of cyclists; Heavy Goods Vehicles are also identified as a potential danger to the safety of cyclists and pedestrians and LCC states that there should be a task force to address this, and the impacts of increased lorry mileage due to construction projects. LCC welcomes the cycle hire scheme but wants it to be extended beyond central London before the Olympics; the development of cycle superhighways is also welcomed. LCC also states that a mechanism whereby boroughs are incentivised to deliver a cycle hub is missing from MTS and that the MTS should direct boroughs to collaborate on walking and cycling routes. LCC also states that the London Cycle Network+ should not be abandoned, and that TfL should improve cycling conditions on all of its roads and use green spaces as a cycling resource.

### **Railfuture**

Railfuture states that there should be a modal balance rather than shift, as well as cross boundary and cross suburb services. Railfuture also states that the MTS must ensure transport is good value for money, seamless and efficient. It considers that land use management provides balanced development throughout London, and that the MTS must mirror priorities set out in the revision to the London Plan.

### **Southwark Rail Users Group**

Southwark Rail Users Group states that there are severe gaps in public transport services in inner South London, and states that they can be helped by Overground rail services. Southwark Rail Users Group also states there is a need for direct rail services into Central London rather than orbital links as well as stating any deterioration in radial transport would add to crowding and congestion.

### **Sustrans**

Sustrans states the MTS should seek to address current inequalities in take up and access to cycling and would like an emphasis on improving the environment and the quality of life around homes and offices. Sustrans also states that the Local Implementation Plans process and Regional Transport Strategy should be used consistently across London; the MTS should set delivery targets in key areas (including mode shift) and should promote travel demand management through a London-wide road pricing scheme. Sustrans considers that the MTS should prioritise climate change measures with cross-over benefits, for example active travel to improve health. It supports a dispersed growth approach in order to reduce journey distances and make it easier for people to use sustainable modes. It states that the MTS should not encourage further runway capacity in the south east and should promote alternatives to air travel. Sustrans notes that the MTS should promote walking and cycling for journeys to and from outer London town centres and promote the reduction of traffic on residential streets and active travel routes. It would like to see the reallocation of road space to sustainable modes, and the reduction of traffic speeds especially in residential areas; it is in favour of more Smarter Travel initiatives, including its own TravelSmart programme, and supports the promotion of cycling to school.

## **5. Business representative organisations & economic and regeneration partnerships (9)**

### **Association of International Courier and Express Services (AICES)**

AICES welcomes the approach of smoothing traffic flow and reducing congestion, because congestion has an adverse impact on the industry. It is concerned that there is no explicit mention of express services or air freight and does not believe high speed rail can be a substitute for regional air transport. It would like to see the inclusion of policies related to kerbside and bay loading and unloading; and better administration of penalty charges with regard to freight and delivery services. AICES supports the removal of the Western Extension of the Congestion Charging Zone and states that any wider road charging schemes should not result in additional road costs for those using the roads for business.

### **Central London Forward**

Central London Forward shares the high level strategic priorities set out in the Statement of Intent. It identifies as its four key priorities for central London: increased reliability of public transport; continued investment, particularly in areas where public transport access is poor; the need to provide suitable transport in opportunity areas and areas for intensification; and the increasing demands placed on London as a 24-hour city, and the need to ensure that public transport and the public realm are suitable for this. It acknowledges the agenda to

spread economic growth to outer London but notes that central London remains fundamental to the Capital's success. It welcomes Crossrail, the Tube upgrade and plans to promote walking, and states that it is important for TfL and the boroughs to work together on enhancing interchanges and stations in inner London. Central London Forward identifies a number of areas where regeneration opportunities should be supported by public transport investment, including Elephant & Castle, Vauxhall/Nine Elms; and states that there should be an East London Line interchange in Brixton. It notes its ongoing discussions with the Mayor regarding the Crossrail levy and would like a consideration of this and other contributions, for example CIL and Section 106. It calls for a systematic review of bus routes and services, stating that there is crowding on some routes and that there is more scope to use mobile and internet services for passenger information. Central London Forward states that, although traffic has reduced, congestion has not improved and notes the effects of roadspace re-allocation and the promotion of cycling; it also highlights the potential future effects of public realm schemes in central London. It would like improvements at some of the main rail termini, in conjunction with Network Rail and DfT. It states that there needs to be an effective reward and penalty scheme in addition to the Permit Scheme for roadworks, and it would like to discuss with TfL alternatives to weekend closures for Tube upgrade works. Finally, to improve air quality, priority should be given to cleaning up the bus and taxi fleets.

### **Central London Freight Quality Partnership**

The Central London Freight Quality Partnership states that strategic rail freight interchanges, multimodal freight and break-bulk facilities should be promoted and there should also be a distribution of the latest freight 'best practice' across boroughs to help produce consistent initiatives. More specifically it states the need to safeguard inner city rail freight as well as potential multimodal interchange sites. The Central London Freight Quality Partnership also states that there should be an increased sharing of knowledge, costs and use between all London boroughs on the matter of electric and low emissions vehicles as well as attempting to increase the efficiency of freight movement through freight consolidation (however there should be also be a London-wide review). The Central London Freight Quality Partnership also states that ways to encourage electrical vehicle uptake in the Large Goods Vehicles sector should be investigated and implemented as well as stating that there should be a kerbside delivery policy across London.

### **The Federation of Small Businesses (FSB)**

The FSB believes it is important to recognise the difference between essential and non-essential journeys made by private vehicles. It strongly supports the expansion of public transport, but not at the expense of essential road journeys. The FSB is concerned that the Mayor's commitment to respecting choice is not compatible with a desire to reduce carbon emissions. With regard to implementing the MTS across London, the FSB does not believe that a series of consistent outcomes is essential and that London's diversity should be reflected in these outcomes. The FSB also states that it would be helpful to see these proposals in light of the Outer London Commission's findings. The FSB welcomes the new working relationship with the boroughs and would like to see the influence of the MTS diminish as it reaches a local level. The FSB supports the dispersed growth option and

states that economic development should be enabled in all parts of London, which will require greater provision for the private vehicle user, and a standardised approach to deliveries or new peripheral transport routes in order to enable businesses to operate, however, a 'one size fits all' approach is not appropriate. The FSB states that parking is also a key issue which affects businesses and provision for parking must be made in MTS. The FSB believes that road pricing cannot be justified without a significant increase in public transport provision, and that in the current economic climate the additional burden on business cannot be justified. The FSB supports moves to encourage the use of public transport and walking and cycling, but believes there should be a distinction between business vehicles for essential journeys, and private vehicles making non essential journeys. The FSB recognises the need for improved orbital transport, but in the current economic situation thinks there should be a focus on increased provision for bicycle and car parking near rail stations to encourage use of public transport. The FSB would also like to see the end of bus lane enforcement, pedestrian zones and traffic calming measures and supports measures to smooth traffic flow. The FSB supports new technology and incentives to move to electric vehicles and would like the MTS to pay greater attention to the transport needs of businesses.

### **London First**

London First welcomes many of the plans outlined in the Statement of Intent, particularly improvements to public transport capacity; the linking of transport and land-use planning; the need to improve road network conditions and the intention to develop demand management measures. In the final strategy London First would like to see a list of projects to 2031 and notes that a major challenge is achieving value for money in constrained times, calling for investment to be targeted where it can achieve maximum economic benefit, finding sustainable ways to fund transport including the use of revenue from road user charging; and a wholesale review of the bus network to ensure that supply matches demand. London First is particularly concerned about road network management and congestion and recommends measures such as holistic planning of all major routes and improved rapid response facilities. London First welcomes the proposal to explore road user charging more fully and also calls for better management of disruption and approaches to freight and servicing, including use of freight and waste consolidation centres, use of out-of-hours deliveries and consolidation of the large numbers of light goods vehicles. London First states that it will be impossible to meet climate change and air quality targets without significantly reducing congestion. London First is also keen to improve end-to-end journey experience through improved interchanges, aligned multi-modal timetables, better provision of information, flexible, unified ticketing and the integration of TfL and non-TfL services; also there should be an emphasis on integration of modes, including taxis and river transport. London First states that there is a need for more airport capacity (including Heathrow expansion), and that there should be a new heliport closer to the City and Canary Wharf. Other policy priorities include the completion of Overground rail upgrades, future work on Crossrail 2 and new river crossings in East London. With regard to land-use options, London First notes that central London is at the heart of the UK economy and states that its growth must be supported through improvements to public transport networks but also

states that where improvements to transport in outer London can achieve comparable economic benefits, these should be given equal priority. London First also states that development should be promoted in accessible areas which maximises density. It also advocates the enhancement of the urban realm; integrated policing; and safe transport at night. Lastly it supports implementing electric vehicles on a supplementary, not additional, basis.

### **London Thames Gateway Development Corporation (LTGDC)**

LTGDC favours the option of encouraging outer London growth and notes that there is enthusiasm for this in east London. Growth should be concentrated on key town centres (as long as it is not at the expense of other centres), and orbital connectivity is the key to achieving regeneration and community living. LTGDC states growth needs to be matched with higher levels of investment and sub-regional plans should be co-ordinated with Local Implementation Plans to monitor the outcomes. In terms of managing demand, it would like to see policies that encourage a shift from the car to public transport, and urban realm improvements to support cycling and walking. It highlights the Blackwall Tunnel and A12 corridor as areas where these policies should be applied. LTGDC strongly supports the approach of increasing transport capacity and calls for a reinstatement of the Docklands Light Railway extension to Dagenham Dock; a Barking to Royal Docks bus corridor; a new C2C rail station at Beam Park and a further bus corridor to Rainham. The LTGDC was disappointed about the cancellation of projects such as Greenwich Waterfront Transit and would like to ensure that the policy behind these projects is not lost. It strongly supports a new river crossing and increased north-south access. LTGDC would support targeted road pricing as a package of measures to reduce demand and also to fund major transport projects; but a London-wide scheme would need greater consideration. LTGDC believes improving the natural and built environment is the greatest priority for improving quality of life and that it will have many beneficial effects in terms of air quality, noise and health and it is also important to reduce crime and the fear of crime in order to improve an area's image. The LTGDC states that there should be greater emphasis on regeneration as it is key to all issues and would like to know more about the policies to achieve regeneration in the opportunity areas; and would also like to know more about the Mayor's ideas for a Thames Estuary airport. The LTGDC supports the use of SCOOT in managing traffic and supports the provision of electric vehicle charging points.

### **Motorcycle Industry Association (MCI)**

The MCI welcomes access to bus lanes for motorcycles however is concerned about the lack of mention of Powered Two Wheelers (PTWs) or any policies towards PTWs in the MTS. The MCI also states that there needs to be a London wide motorcycle strategy in the MTS which encourages safer riding and introducing measures to reduce rider vulnerability as well as stating that the MCI is opposed to 'demand management'. The MCI believes that transport needs to be responsive to the demand placed on it by users and should be managed to cater for individual choice in transport. It supports traffic smoothing measures, low cost parking and removal of traffic calming measures and considers there is no role for road pricing at the current time. The MCI supports the promotion of a shift from conventionally-powered vehicles to electric vehicles and powered two wheelers.

### **Park Royal Partnership**

Park Royal Partnership is concerned about the adverse impact of road traffic congestion on growth, and is also concerned about a potential imbalance between investment in east and west London, the former benefiting from, for example, more access to Crossrail. It states that there should be implementation of the Fastbus concept, as well as improved access to rail and Tube stations including Crossrail. Park Royal Partnership also states that there needs to be better local bus services and London Overground improvements as well as improved ticketing, travel planning and smoothing of traffic flows. Park Royal Partnership also states there should be a smoothing of traffic flow and the development of a new transport hub at Old Oak, which should also act as an access point for High Speed 2 rail.

### **South Bank Employers Group**

The South Bank Employers' Group states that there needs to be investment in pier capacity and promotion and considers that there is not enough clarity about integration between National Rail and TfL modes. The South Bank Employers' Group also states that the MTS has to be clear about national and regional priorities, as well as pressure points which may require a more prescriptive approach. It also notes the needs for stronger input mechanisms for business in strategic transport issues. The South Bank Employers Group also states that they welcome the walking and cycling initiatives and the Legible London initiative.

## **6. Non-departmental public bodies (4)**

### **English Heritage**

English Heritage states that any future development of London should have regard to the historic environment and that this should be a key outcome for the built and natural environment objective. For this, proposals for transport schemes (e.g. Cycle hire and Crossrail) should be considered in the light of their potential impact on this environment. It says enhancement of the historic environment should be recognised as a key contributor to quality of life and English Heritage considered a key partner in the delivery of projects that have an impact on the character of places. Understanding should also be sought, of how the existing network of centres has developed. This would help sustain and reinforce the heritage value and distinctiveness of places. Finally, English Heritage would like greater clarity on shared spaces and assurance that, in considering sites for new airport capacity, the impact on the historic environment will be addressed.

### **Environment Agency**

The Environment Agency supports the emphasis on environment and climate change and the intention to consider issues across the Mayoral strategies in parallel. The Environment Agency believes that wide-spread behavioural changes are needed to reduce reliance on private passenger road transport. It supports measures to tackle climate change and acknowledges that adaptation measures are also necessary, but urges that these do not contribute to CO<sub>2</sub> emissions. The Environment Agency is concerned about airport expansion and would welcome early engagement on any proposal for a Thames Estuary Airport. It supports High Speed 2 in principle. The Environment Agency would like to see

local planning targets included in the MTS and the sub-regional strategies. It generally supports greater sustainable use of the River Thames but says awareness is needed of potential conflicts between transport, leisure uses and bio-diversity. As well as supporting electric vehicles, The Environment Agency would like to see support for development of other alternative fuels such as hydrogen and biofuels. It questions how existing measures will deliver a 20% reduction in ground based transport emissions given current monitored trends in air pollution and encourages serious consideration of all demand management measures.

### **Highways Agency**

The Highways Agency is already working to increase capacity on the M25 and will look to both the MTS and London Development Agency strategy to lock in the benefits of this work by managing the demand for private car use. The Highways Agency will support proposals that reduce the existing demand on the network by implementing a range of measures aimed at influencing travel behaviour combined with measures to manage residual traffic.

### **Network Rail**

Network Rail states that the Mayor needs to adopt a long term view about challenges and wants promotion of modal shift away from less sustainable modes towards rail. It would like long-term investment to address issues of crowding on the network, noting that despite its planned enhancement, there will still be issues of capacity. Network Rail also states that more information is needed on the Mayor's approach to orbital and radial routes. It supports High Speed Rail and notes the need to accommodate increasing freight on rail. Network Rail says it would like London Regional Transport Plan and Local Implementation Plan partners to engage in the development of the London and South East Route Utilisation Strategy, as well as stating a commitment to climate change and safety and security.

## **7. GLA commissions (2)**

### **London TravelWatch**

London TravelWatch would like the MTS to acknowledge that there will be little new road capacity and indicate how best use is to be made of the existing rail and road networks. London TravelWatch cites interchanges as another issue to be addressed, as well as step-free access, cycle parking provision and additional rail infrastructure, with electrification of London's National Rail network. London TravelWatch states that there should be more in the MTS on reallocation of road space and the use of pricing to manage demand. London TravelWatch states that respecting choice may not be a workable solution on the road network and advocates the introduction of new more sophisticated and flexible pricing schemes and increased bus priority. London TravelWatch states that the strategy also needs to be clear about what funding is available and where funding is coming from. It considers journeys to health services should also be considered, in the context of NHS reconfiguration. London TravelWatch is concerned that any focus on growing outer London is supported by additional capacity on public transport networks. London TravelWatch advises land planning be designed around cycling, walking and the bus rather than around private vehicles. In terms of consistency, London TravelWatch states that the MTS needs to

set out clear policies that boroughs will implement in order to ensure consistency of service, for example in providing bus priority across borough boundaries. London TravelWatch welcomes additional capacity on the rail network, but does not see this as an option with the road network, believing instead that greater use of road pricing will be necessary, either as part of a London wide scheme or in discrete zones. London TravelWatch states that new technology would be useful as a way to introduce a more sophisticated road pricing scheme. London TravelWatch also warns of the importance of 'future proofing' new technology policy proposals. London TravelWatch wants to see a greater emphasis on buses and bus priority, and notes their status as the only universally accessible form of transport, suggesting that marketing could help improve bus ridership, especially in outer London. London TravelWatch also says that Dial-a-Ride should be improved. London TravelWatch would like to see some flexibility in the Strategy and different scenarios addressed as much could change in the period to 2031; it also seeks reassurance that the public consultation will engage a wide audience.

### **London Sustainable Development Commission (LSDC)**

The LSDC supports the vision set out in the Statement of Intent but states that more emphasis should be given to how the strategy will support the energy, biodiversity, air quality and noise strategies. It considers that the strategy could go further in trying to reduce the demand for travel. The LSDC states that reducing car use, particularly in outer London, will need specific action and it is not clear how this will be achieved. The LSDC supports the fuzzy boundaries of the sub regions but wants more clarity on how the strategy will be delivered through Local Implementation Plans. The LSDC considers that it should be clearer that all transport policy should reflect the overriding need to reduce CO<sub>2</sub>, including the contribution made by shifting to walking and cycling. Finally, LSDC states that it should also be clear how TfL's own policies and procurement will support this, for example by using hydrogen fuel cells in the bus fleet.

## **8. Aviation/ motoring organisations (4)**

### **Association of British Drivers (ABD)**

The ABD welcomes development of the outer London transport network, linking transport and planning more closely and enabling more local borough involvement. It also supports a more dispersed growth scenario. The ABD questions if there is scientific evidence to support expensive measures to control emissions, states that there is no need to manage demand and opposes all road user charging including the Congestion Charge. The ABD also states that there should be a development of an improved road network and supports smoothing traffic flows. It says new transport capacity should be determined by economic benefits and their impact on other transport modes and generally opposes tram schemes. It supports walking and cycling but not a blanket replacement of subways and footbridges with surface crossings. The ABD states that transport measures for the Olympics must have long term benefits; says there is a need for improvement in air quality; and supports electric vehicles. The ABD also states that the Sol phrases, 'removing dysfunctional gyratories' and 'one way streets' are blanket statements and inappropriate for some areas. It considers there should be more orbital routes and higher volume routes between regional

centres. Lastly it states that there should be less direction from TfL and much more support and advice on best practice.

### **BAA Gatwick**

BAA Gatwick states that public transport should be affordable to encourage people to use it, and that the Oyster card should be acceptable on London to Gatwick routes. It welcomes the focus on addressing road congestion and seeks a focus on improving routes to Gatwick, particularly the A23. BAA Gatwick would like to see greater emphasis on the importance of airports to London and the need to ensure surface access, including the potential to link Gatwick with a future High Speed rail link connecting London to the North.

### **BAA Heathrow**

BAA Heathrow supports the overarching goals of the MTS, particularly the recognition that London is an international hub and that continuing economic growth depends on expanding access to markets, which depends on excellent transport connections. It considers that the development of the Thames Valley Corridor is of fundamental importance. BAA Heathrow welcomes the acknowledgment of the fact that a shortage of airport capacity could limit London's economic growth but is concerned about the Mayor's opposition to a third runway at Heathrow, which it states is inconsistent with national transport policy. BAA Heathrow asserts that air congestion is a cost to business in the same way that road congestion is; demonstrating the need for extra capacity at Heathrow. BAA Heathrow supports plans to increase London's national connectivity by rail and states that High Speed 2 should be directly connected to Heathrow; it also advocates the Airtrack scheme. BAA Heathrow believes the challenge in outer London is to achieve better connectivity between bus, road and Underground services; orbital routes could take the form of 'zig-zag' links to enable short journeys. It recognises that some form of road pricing will be necessary in the long term in order to control congestion and reduce emissions. BAA Heathrow states that schemes aimed at increasing public transport access to Heathrow should emphasise coach services and enhanced rail capacity; there should be further evaluation of tram schemes in outer London; and bus lanes should be extended onto the motorway network coming into outer London. With regard to electric vehicles, BAA Heathrow believes there is a need to manufacture vehicles which meet speed, cost and distance requirements, and provide sufficient charging points.

### **RAC Foundation for Motoring**

The RAC considers that the car is not given appropriate priority in the Statement of Intent and that measures to reduce car use should be limited as the car will continue to be an important mode, especially in outer London. It also states that there will always be a need for moving freight by road. The RAC also states that proposed increases in bus provision will not meet objectives if the road network is subject to congestion and so suggest improvement to the road network.

## **9. Local health / community representative organisations (1)**

### **Enfield PCT**

Enfield PCT states that reducing health inequalities through improvement to public transport and access to healthcare facilities should be explicit in the MTS.

## **10. Partnerships (2)**

### **South London Partnership (SLP)**

The SLP agrees that there will need to be a robust transport solution to meet the challenges identified. While the SLP agrees that the DfT's DASTS approach is logical it emphasises the need to strike a balance between providing for long distance commuter journeys and short local trips as south London boroughs should not end up as transit corridors for neighbouring counties. The SLP welcomes the proposed Regional Transport Plans and states that these plans should provide a consistent framework which reflects sub regional variation without leading to a lowest common denominator, 'one size fits all' approach. It considers the MTS will need to address the practical development of these plans and new style Local Implementation Plans in some detail to ensure that the new transport planning framework will be equitable and deliverable. The SLP state that key determinants of the balance of the three key policy approaches will be financial viability and social acceptance and in setting priorities, a high degree of pragmatism is required. The SLP is pleased to see the use of technology to increase capacity, although it must be seen primarily as a medium to long term investment. The SLP believes for outer London development centres to work, there needs to be a step change in transport provision and quality. In mode terms it sees this as requiring major investment in rail capacity, frequency and quality, tram extensions where possible and significant bus priority to improve local bus corridors. It says care should be taken in introducing additional highway capacity because of the risk of unconstrained demand from adjoining regions. It says whilst there is little enthusiasm in south London for road pricing measures per se, there is a recognition that through demand management tools, including pricing, it may be possible to influence travel choice. The SLP welcomes new technology but says there is also a need for traditional solutions as we wait for the technology to become available. The SLP favours a more dispersed growth scenario and says connecting major centres and local centres in south London should be a priority. The SLP considers that strategic outer London development centres and orbital connectivity should be prioritised. It is not appropriate to prioritise one policy over another with regard to quality of life, journey experience or safety and security. The SLP would like to see more detail on emissions controls and other possible restraints to address the issue of climate change, and says that regeneration should be included in the theme of transport opportunities for all.

### **West London Partnership (WLP)**

The WLP welcomes the focus on developing outer London and the sub regional approach to planning but would like greater clarity with regard to strategic development and metropolitan town centres in west London, and how they should be connected by public transport, as well as recognition of the characteristics that differentiate west London. The

West London Partnership states there is a need for improved public transport services and infrastructure to serve Heathrow. It would like the Strategy to consider providing boroughs with the flexibility to set parking standards and believes that road schemes and traffic management schemes may be needed to ensure no further deterioration in journey time reliability on key spokes and orbital connections. The West London Partnership would like clarification on how the Mayoral strategies will work together and with stakeholders and would like to be consulted on how to handle cross – boundary issues. It emphasises the importance of smooth interchange and proposes an outer London Oyster card be offered at a reduced price as well as suggesting express buses as a way to improve orbital connectivity. The West London Partnership considers road traffic congestion to be a major concern and seeks to encourage more sustainable choices through travel planning, although it would also review road user charging options as Government and TfL policy becomes clearer. It also seeks to improve the efficiency of freight services to west London business whilst limiting the impact on the community and the environment.

## **11. Disability and mobility organisations (2)**

### **Croydon Mobility Forum**

Croydon Mobility Forum states that railings can help the visually impaired to move around and so should not be removed; street clutter is a barrier to accessibility and the strategy should include references to Scootability. It states that the Freedom Pass for the disabled should be maintained and access to priority bus seats and wheelchair spaces should be given priority over buggies on buses; there needs to be full integration and accessibility of all transport.

### **London Visual Impairment Forum (LVIF)**

LVIF comments that transport planning needs to take into account the increasing number of visually impaired and disabled people, and that accessibility of Underground and Overground stations needs to be improved. LVIF also states that they are concerned over shared surface streets for safety reasons; they are also concerned about uneven pavements and overhanging trees as obstacles for the visually impaired. LVIF also states that they oppose the Mayor's proposal for cyclists to turn left on red as it will render pedestrian crossings at traffic lights unusable, however LVIF supports cycle highways. LVIF also states that hydrogen and hybrid vehicles may be a danger to partially sighted or blind people because they make little noise.

## **12. Others (7)**

### **Age Concern (London)**

Age Concern is concerned that initiatives to make transport more accessible will be undermined by public expenditure constraints in the new economic climate. It would like to see more safety measures to enable older people to use buses, such as: buses stopping for enough time; buses pulling up close to the kerb; drivers being able to operate the ramp; addressing the problem of crowding at school travel times and leaving space for wheelchairs. Age Concern recommends more training for drivers and that enough time for

stops should be built into bus timetables. Age Concern believes it is important to ensure a joined up approach where all modes of transport combine to ensure accessible journeys for older people across London, including specialist door to door and community transport. This integration should include NHS patient transport in order to avoid the situation where older people have to use their transport allowances to access healthcare. Finally, it stresses the importance of consulting with older and disabled people before taking transport decisions at local, sub-regional and regional levels.

### **British Telecom (BT)**

BT states that there should be a greater emphasis on smoothing traffic flows, using methods such as flexible working, supports real time information services and suggesting expansion. BT also supports electric charging points, and suggests the possibility of using their payphones to further the scheme. BT believes that subsidising the development of electric industrial vehicles would help deliver a wider range of fleets to London in a meaningful number as well as suggesting more effective systems integration and sharing of services across and within TfL and the Greater London Authority family. BT also notes that a London wide integrated CCTV network that is interchangeable between BT Police, Metropolitan Police Service, TfL and London boroughs would be a step forward.

### **British Vehicle Rental and Leasing Association (BVRLA)**

The BVRLA states that rental and fleet cars can help to achieve a number of the objectives outlined in the Statement of Intent: reduced need for private car ownership; reduced overall mileage and, because these cars are newer, reduced CO<sub>2</sub> emissions as well. It states that car rental facilities should be part of transport hubs in outer London, with parking spaces set aside for these vehicles. With regard to road pricing, it states that this should be used to encourage off-peak car usage, it should place a minimal burden on businesses in terms of payment and management and schemes should be sophisticated and inter-operable; and any scheme must recognise the role of commercial vehicles and not unnecessarily penalise them. It supports the policy on electric vehicles and comments that car rental has a role to play in enabling people to become accustomed to this new technology without the costs of ownership; it suggests London-wide free parking would assist with their uptake.

### **Institute of Civil Engineers (ICE)**

The Institute of Civil Engineers states that the main aim of the Transport Strategy should be to build on the modal shift to public transport that has already been achieved and that targets should be set for this. Demand management measures may also be appropriate. It notes a number of cancelled projects and states that enhanced bus services can increase capacity: buses should be given priority on the road and there should be better information (for example bus maps) to encourage greater use of this mode. It welcomes the emphasis on cycling but states that safety concerns prevent greater uptake; it supports the commitment to a new river crossing.

### **London Forum of Amenity and Civic Services**

The London Forum of Amenity and Civic Services states that increasing road capacity is not a realistic option, there is a pressing need to reduce the demand for road space and that pricing should be used because it is the most flexible and least arbitrary form of demand management, with local schemes fitting into a London-wide system. It also supports reducing the overall need to travel and encouraging people to use more

sustainable modes. It advocates the development of a 'London Lorry' which is smaller and less polluting; this could now be electric and it also suggests ways of encouraging electric vehicle uptake, including reduced parking charges and allowing them to use bus lanes. London Forum of Amenity and Civic Services states that more consideration is needed over airport expansion and its CO<sub>2</sub> effects and that, in order to encourage people to adopt measures to reduce emissions, there should be interim targets of five years within the Strategy.

### **Port of London Authority (PLA)**

The Port of London Authority (PLA) is disappointed that river transport, particularly with regard to freight, has not been given more consideration in the Statement of Intent (Sol), and notes that the London Plan Sol includes an objective of making better use of the Thames. The PLA notes that river transport is sustainable and could help to achieve CO<sub>2</sub> reduction targets; its emission levels compare favourably with road transport and there is planning policy in place to achieve modal shift to rail and water freight transport. There is scope to use the river to transport materials for building Crossrail and support should be given, in the MTS, to using the river for Freight. The PLA would like to see a reference to the draft MTS for the Olympics and notes that river transport is key to achieving the aim of the 'greenest ever' Olympics. While there are references to London's sea ports in the Sol, there is insufficient reference to water transport at other levels of the transport network including the Blue Ribbon Network and the Port of London itself. Piers should be included in multi-modal strategic corridors and Murphy's Wharf and Ford's Dagenham Wharf should be considered as major logistics nodes. There should be reference to river use in morning peak travel and reference should be made to the aim of achieving a five per cent increase in passengers and freight on the Blue Ribbon Network between 2001 and 2011.

### **Tandridge District Council**

Tandridge District Council states that the MTS should take into account the negative impacts of further runway capacity on areas surrounding London such as Gatwick and the Tandridge District. Tandridge District Council states that the MTS should take into account cross boundary implications such as the effects of park and ride schemes, the contribution of improved rail facilities and cross boundary for improved real time information. Tandridge District Council states that there should be consideration for an extension of the tram link (Purley/Streatham). It also emphasises the importance of having sufficient cycle hire and parking facilities at central London Termini enabling visitors and commuters to access cycles in central London. Tandridge District Council also raises concerns about the environmental impact of widening the M25.

## Appendix 3: Statement of Intent consultation questions

### Question 1

Referring to chapters one and two, are there any other transport challenges facing London that the MTS should address?

### Question 2

Referring to chapter three, the MTS Statement of Intent proposes adopting a spatial approach similar to that set out by the DfT's Delivering a Sustainable Transport System (see Figure 1).

Does anything need to be added or improved to ensure this approach fully complements the national strategy while meeting London's needs?

### Question 3

Referring to chapter three, the MTS will be implemented in partnership with boroughs and other stakeholders through London Regional Transport Plans and LIPs.

With this in mind, how should the MTS ensure consistent outcomes and progress across London?

### Question 4

Referring to chapter four, what is the right balance between the three broad policy approaches:

- changing land use assumptions
- managing demand and
- providing further transport capacity?

What role can new technologies play in tackling London's transport challenges?

- a. For land use assumptions, your views would be welcomed on the following:
  - What transport interventions are required to support economic development focused on 'strategic Outer London development centres'?
  - What transport interventions are required to support more growth in Outer London generally?
  - If there were to be a greater focus on economic development in Outer London, what additional transport interventions would still be required to maintain central London's economic vitality?
- b. For managing demand, your views would be welcomed on the following:
  - What is the role of pricing (eg targeted local road pricing or London-wide road pricing) to help manage demand?
  - Would your view of pricing change if there was more economic development in Outer London where car usage is higher and public transport less pervasive?
- c. For providing further transport capacity and connectivity your views would be welcomed on the following:

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- Where is additional transport capacity and connectivity most needed, in the context of proposals to alter land user assumptions and manage demand?

d. For using new technologies your views would be welcomed on the following:

- What role can be played by new technologies, for example electric vehicles, in tackling challenges such as climate change, air quality and noise?
- What steps should be taken to support their development and use?

### Question 5

In chapter four, two broad land use transport options are identified:

- Option 1 prioritises focused economic development in central London, with more emphasis on radial transport capacity and connectivity improvements into central London and transport improvements within central London itself
- Option 2 prioritises a more dispersed growth scenario, with more radial transport capacity and connectivity improvements into potential 'strategic Outer London development centres' and other metropolitan town centres

Any final decision about which option is taken forward will be strongly influenced by economic viability. With this proviso, what are your views on the two broad options given the transport and economic challenges London faces?

### Question 6

Referring to chapter four:

a) To support economic development and population growth a number of broad policies have been outlined to improve London's national and international links, capacity and efficiency London-wide, radial links into central London and 'strategic Outer London development centres' and orbital connectivity. What are the policy priorities?

Are there any other policies that should be included in the MTS under the economy theme?

b) To enhance quality of life a number of broad policies have been outlined to improve journey experience, the built and natural environment, air quality, reduce noise impacts and improve health.

What are the policy priorities?

Are there any other policies that should be included in the MTS under the quality of life theme?

c) To improve safety and security a number of broad policies have been outlined to reduce crime, the fear of crime and antisocial behaviour, and to improve road safety and public transport safety.

What are the policy priorities?

Are there any other policies that should be included in the MTS under the safety and security theme?

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d) To improve transport opportunities for all a number of broad policies have been outlined to increase accessibility, support regeneration and enhance access to opportunities and services.

What are the policy priorities?

Are there any other policies that should be included in the MTS under the transport opportunities for all theme?

e) To tackle climate change a number of broad policies have been outlined.

What are the policy priorities?

Are there any other policies that should be included in the MTS under the climate change theme?