LONDON BOROUGH OF NEWHAM

CONSULTATION RESPONSE ON THE DRAFT MAYOR’S TRANSPORT STRATEGY

The London Borough of Newham (LBN) welcomes the opportunity to provide its comments on the Draft London Mayor’s Transport Strategy.

This consultation response has been prepared by officers in the transport planning, highways, planning and regeneration teams of LBN and has been endorsed by the Deputy Mayor and Strategic Delivery and Cabinet Member for Community Neighbourhoods, Regeneration and Planning and Public Affairs, Cllr. Ken Clark and the Mayoral Advisor for the Environment, Cllr. Patrick Murphy. For further information or questions regarding this response please contact: Murray Woodburn, Principal Transport Officer, murray.woodburn@newham.gov.uk.

The consultation response has been provided in the format requested, and the questions presented at the end of each chapter in the Mayor’s Transport Strategy are responded to in the following sections.

However, LBN also has some wider observations which go beyond the questions posed at the end of each chapter.

In broad terms, the aims of the strategy and the proposed interventions and measures are supported by LBN. However there is concern around the cost of delivering the strategy and how it is to be funded. LBN is most concerned by the lack of a promised commitment to further river crossings in east London in the document and the lack of commitment to investigating fully an Eastern Branch of Crossrail 2 to support growth in the east sub-region, as recommended by the National Infrastructure Commission.

We demand that the relative merits of additional road crossings in east London are examined immediately, and in particular, that the regeneration and economic uplift of a road and DLR crossing at Gallions (compared to just a DLR crossing) is identified. TfL need to be working with LBN to develop the best possible Crossrail 2 scheme which will be supported by Treasury and will deliver the most support to London’s growth – which we firmly believe is the Eastern Branch.

LBN is also concerned that the London Plan is not more closely aligned with this transport strategy, as they are quite clearly inextricably linked, and is disappointed that one is being consulted upon in advance of the other. They are clearly complementary documents and are very closely related to one another. It therefore seems ill-considered that the consultation on the transport strategy will end before we have seen any sight of the new London Plan.

In terms of a consultation response, this limits the scope of the comments that can be provided as it is impossible to reference between plans to accommodate growth across London and future transport provision and investment, but more fundamentally, it shows a sub-optimal approach to planning for London’s growth that many European cities would find inconceivable. Why a city with the importance of London does not deserve such a coordinated approach to its future growth is a question for the London Mayor to answer.
While the majority of the general aims and objectives of the strategy are to be widely supported, LBN has fundamental concerns over the levels of funding needed to deliver such an ambitious strategy and therefore questions its pragmatism and its ultimate deliverability. LBN believes that the balance between idealism and realism in the document has not been correctly achieved and the overall credibility of the strategy is unfortunately undermined as a result.

LBN’s full response is set out below.

CONSULTATION QUESTIONS ON CHAPTER 1 – THE CHALLENGE

1) London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.

- Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.

We think that London’s challenges have been succinctly outlined in this chapter. LBN is highly supportive of interventions which address the imbalance between motor vehicles and other users of London’s streets. London’s greatest challenge may be how many other Boroughs are also so inclined. Without significant investment in other modal opportunities in outer London, this imbalance could continue for some time in those areas – and some Boroughs may still not welcome this type of change, as car drivers remain a powerful lobby in outer London.

London’s environmental challenge is a very significant one, and it is perhaps understated, if anything, in this chapter, although it is understood that admitting the severity of the air quality crisis across London could be seen as an admission that TfL’s policies have been ineffective to date. It is quite clear that significantly more restrictive policies will be required alongside significant investment in sustainable modes of transport if London’s air quality trends are to be reversed. LBN’s view on whether this reversal can be achieved without a road user charge or a substantial uplift in investment levels is presented in a later response below.

LBN fully recognises the relationship between a quality public transport network and quality of life for Londoners and the ability to deliver sustainable ‘good’ growth and supports this aspiration. However, delivering high quality public transport will itself be a challenge within the current funding environment, given the significant costs of such projects and this issue is raised again later in this response.

‘Good growth’ principles are well established in a rapidly regenerating Borough such as Newham, and it is essential that the delivery of London’s growth does not result in significant deteriorations in the transport experiences for the city’s existing residents. This will undoubtedly be a challenge, made even more challenging by the apparent lack of funding (or indeed the short to medium term prospect of funding) for the major public transport projects that will be needed and the significant lead times before such projects will be delivered. This challenge is further complicated by the spatial and transport strategies for the city not being progressed in tandem, which suggests a disconnect between land use planning and transport planning for London, with potentially damaging consequences to the effectiveness of either strategy.
CONSULTATION QUESTIONS ON CHAPTER 2 – THE VISION

2) The Mayor’s vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80 per cent of Londoners’ trips will be made on foot, by cycle or using public transport.

- To what extent do you support or oppose this proposed vision and its central aim?

It is hard to find fault with a laudable vision such as this, as such an outcome would be immensely beneficial to London. The level of ambition is also to be commended, although LBN considers that it will be extremely hard to achieve London-wide by 2041. While such levels of non-motorised and public transport level appear quite possible for those well connected areas of London with high quality and dense public transport networks, well-developed walking and cycling networks and a high quality public realm, achieving such levels in outer London without huge investment in all of these infrastructure areas will be extremely challenging.

As the Boroughs will be expected to deliver most of these improvements themselves at a time where funding at both Borough and TfL level is shrinking, LBN does not believe that this target can be achieved everywhere. We also believe that not all Borough administrations are yet ready to introduce what could potentially be construed by some as ‘anti-car’ policies that would be needed to achieve such an ambitious modal share target, and that its achievability is diminished further as a result.

Until such time as Borough administrations are required to implement such policies instead of being requested to do so, perhaps as a condition of TfL LIP funding, there will continue to be policy ‘anomalies’ across London between Boroughs with different levels of support for the strategy.

3) To support this vision, the strategy proposes to pursue the following further aims:
   i. by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day
   ii. for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041
   iii. for all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London’s entire transport system to be zero emission by 2050
   iv. by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public
   v. to open Crossrail 2 by 2033
   vi. to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor
   vii. to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared with the full network
   viii. to apply the principles of good growth
To what extent do you agree or disagree with the aims set out in this chapter?

These are addressed in turn below:

i. This is an excellent aim and is one to be welcomed. However, more detail on how this is actually to be achieved would be welcomed. This may happen organically, as more trips are made on foot and by bicycle, but it would be interesting to know what potential further interventions could be made to positively encourage people to achieve this target. Incentivised charging on cycle hire to ‘reward’ achievement of active travel levels, for example, may be a possible intervention to be considered.

ii. While the first part of this aim will undoubtedly be very challenging and relies on the behaviour of other road users, the second is clearly impossible, and its inclusion is of little value other than an admirable aspiration. While having a goal zero objective is acceptable in principle, there appears to be no realism in the document over the absolute certainty that this target will never be achieved. Road incidents have a chaotic and human behaviour element to them which will prevent accidents ever being eliminated altogether. Even if we were to have a substantial number of fully autonomous vehicles by 2041, where human error is effectively removed, there is still likely to be accident risk which will result in casualties. Pedestrians and cyclists will remain ‘chaotic’ and the elimination of risk while cyclists and pedestrians are present in a streetscape is simply not realistic, either through gradual behavioural change or legislation.

iii. The composition and characteristics of the bus fleet are entirely within the control of the London Mayor and TfL, so there is no reason to suggest why this element of the aim cannot be achieved. The only question that remains is one of the target date and whether it is rather unambitious, given the level of control held by the Mayor over the bus fleet. Achievement of all new road vehicles being zero emission by 2040 will largely be determined by the rate at which manufacturers phase out petrol and diesel vehicles, and given that a number of manufacturers (e.g. Volvo) have made commitments to phase out the production of such vehicles in a much shorter time frame, this target may, over time, appear unambitious. It is suggested that this target is therefore kept under review year on year as more manufacturers’ future policies on petrol and diesel-only vehicles are more clear. Similarly, manufacturers’ future plans could allow for a more ambitious target for all zero emission vehicles in London, and the 2050 target for this could also potentially be brought forward.

iv. This aim is to be supported, but, as commented elsewhere in this response, there is clearly a significant level of investment required in public transport networks, walking and cycling networks and public realm improvement if such a target is to be achieved. LBN believes that this level of funding is unlikely and therefore the achievement of this aim is also just as unlikely under the current financial operating conditions – both at a TfL level and nationally. While the principle of freight deliveries outside of peak times is entirely sensible, there are clearly some local amenity implications of deliveries outside peaks. Night-time deliveries as trialled during the Olympics at Stratford were fairly successful, but Stratford had unique characteristics with limited residents (at that time) and this approach would not be appropriate everywhere. In mixed use centres, for
example, which are exactly the sort of centres we are trying to create, such amenity issues could be highlighted and careful pre-planning of changes to delivery regimes will be necessary.

v. While it is probably as soon as is practical, it is still far too late, and a lot of time has been wasted in the scheme’s development to date. To learn from the lessons of history, Crossrail 3 should be being investigated in detail now, and not only after Crossrail 2 is agreed and under construction. London cannot wait for these projects, if the ‘good public transport experience’ is to be maintained while growth is delivered. Specifically with regard to the Crossrail 2 scheme, LBN has very serious concerns over the proposed alignment of Crossrail 2 and its ability to support growth across those parts of London where the greatest levels of growth are expected. As a result, LBN questions if the scheme as presented is indeed the best for supporting London’s growth and has been developed on spatial and transport planning need. If not, then it must put in doubt HM Treasury’s support for the scheme, and TfL is urged to develop the best scheme possible in pure transport planning terms. The current scheme is considered sub-optimal in terms of unlocking growth potential and threatens Treasury support of the entire project as a result. This is covered in more detail in the appropriate response later in this document.

vi. The aim is to be supported, as there are clear advantages in devolution of services which have been very apparent to LBN following the transfer of Abellio Greater Anglia services between Liverpool Street and Shenfield to TfL Rail. However, while the Secretary of State appears minded to refuse such applications LBN questions the pragmatism shown here.

vii. This is an objective to be supported. However, in recent discussions with TfL over step-free access at London Underground (LUL) stations in the Borough, a Borough contribution was being sought to the costs of works. This is entirely inappropriate, and step free access across the Underground network is wholly LUL’s responsibility.

viii. Applying good growth principles is a long-established concept and is to be supported. The Borough has already been seeking to deliver such growth in its regeneration schemes, subject to appropriate PTAL levels and supporting sustainable networks. Instead, what is questioned in the strategy is whether sufficient investment in the supporting transport networks will be forthcoming to allow good growth to take place while still delivering London’s growth at the required rate. Already, the delivery of growth in the Royal Docks is being impeded by DLR capacity improvements lagging behind need, and TfL are now beginning to recommend refusal of GLA promoted applications in that area due to DLR capacity concerns. Again this demonstrates the disconnect between land use and transport strategies and between the agencies involved. Good growth must be supported by substantial investment informed by better integration of land use and transport strategies and policies otherwise it will not happen.

CONSULTATION QUESTIONS ON CHAPTER 3 – HEALTHY STREETS AND HEALTHY PEOPLE
4) Policy 1 and proposals 1-8 set out the Mayor’s draft plans for improving walking and cycling environments (see pages 46 to 58).

- **To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.**

These proposals are to be generally welcomed and the concept of healthy streets, healthy routes and liveable neighbourhoods are all to be supported. Similarly the development of improved walking and cycling connectivity across the capital is necessary and must be delivered if any significant change in modal share is to be realised. In particular, investment in relation to evidence base is supported, and LBN expects to see cycling funding allocated on the basis of the recent Strategic Cycling Analysis.

However, the proposals conceal within them some significant policy conflicts that are not discussed in the necessary detail. For example, while there is a laudable attempt made to integrate buses fully into a healthy streets approach with the ‘focus on’ section, it completely fails to address the policy conflicts which buses present to scheme designers. Proposal 1 states quite clearly that schemes must deliver improvements to the pedestrian and cycle environment but in many cases where bus priority cannot be delivered in parallel, improvements to the pedestrian and cycle environment will result in delays to buses. The Borough has received separate notification from TfL that schemes that incur bus delay will not be supported, and the Borough considers that a veto of this sort is completely unacceptable in the development of Borough roads schemes.

While the Borough has some sympathy with the predicament of buses, and the circle of increasing journey times and reducing patronage, we also believe that this problem is substantially one of TfL’s own making, and that TfL’s own Cycle Superhighway and Better Junctions programmes have contributed significantly to the downwards trends in bus journey time and patronage. This subsequent backlash against Borough schemes is therefore entirely inappropriate, as is any one branch of TfL holding any ‘veto’ over the progression of any Borough scheme. Boroughs must be allowed to assess the likely outcomes of any scheme intervention in the round, using an appropriate framework approach and on an entirely scheme-specific basis and to use its engineering and political judgement (based on the achievement of TfL and Borough objectives) to determine if the scheme should proceed.

It may not always be possible to meet every single TfL objective in every scheme, and this must be recognised in any sensible strategy document. The additional concept that any scheme that incurs delays to buses must be mitigated against by implementing bus priority measures elsewhere in the borough at the Borough’s own expense is also not acceptable, and had such an approach been adopted by TfL themselves while implementing their own programme, perhaps the predicament of buses would not be as it is.

There needs to be more thought around how bus journey time issues can be integrated better into a healthy streets approach as the current attempt in the focus section is weak. There also needs to be an explicit discussion of how, when outcomes are conflicting, resolution on schemes can be achieved without any ‘veto’ approach, which is unhelpful. Funding for any necessary mitigation for buses following Borough healthy street interventions also needs to be explicitly discussed in the document.
Regarding cycle hire, LBN welcomes the commitment to further expansion of cycle hire systems across London, although given the capital support required, LBN questions if the current TfL scheme is the best use of scarce resources, particularly given the rise in dockless operators with more competitive rates.

LBN considers there to be considerable merit in welcoming dockless operators to London, subject to a set of criteria to be agreed between TfL and the Boroughs. We welcome the work in this area, but urge it to be completed soon and a London wide MoU agreed, as the pressure from dockless cycle hire operators to commence operation is growing in our Borough.

5) Policy 2 and proposals 9-11 set out the Mayor’s draft plans to reduce road danger and improve personal safety and security (see pages 62 to 67).

- To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security? Please also describe any other measures you think should be included.

These proposals are laudable and are to be supported. However, policy conflicts may arise which are not highlighted. For example, the implementation of a 20mph corridor scheme will adversely affect bus journey times outside peak hours and therefore would currently be opposed by TfL buses, despite these proposals. Once again, buses, may not fit comfortably within some elements of this strategy and this sort of policy confusion needs to be clarified.

As highlighted previously, LBN expresses some concern over the adoption of a goal zero approach as it is clearly entirely unrealistic for such chaotic events and would urge a more realistic interim target to be adopted.

6) Policy 3 and proposals 12-14 set out the Mayor’s draft plans to ensure that crime and the fear of crime remain low on London’s streets and transport system (see pages 68 to 69).

- To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London’s streets and transport system? Please also describe any other measures you think should be included.

Clearly efforts to ensure that crime and the fear of crime are reduced are to be supported, although besides additional investment in the policing of the transport network, it is not clear what other non-financial measures would be of merit.

Given LBN’s concerns expressed over the overall funding to deliver this strategy, there is a similar concern over the funding for this element, and the wider level of support for the British Transport Police and Metropolitan Police that would be necessary to deliver the positive changes envisaged.

LBN believes that the introduction of night tube and a more 24hr economy in parts of London will place additional demands on law enforcement and safety agencies which will require
funding in parallel to any needed to extend services. Staff levels at stations during night tube operation must be maintained at levels which ensure adequate security for passengers.

In addition, in times of increased terrorist threat, London’s transport system must remain protected and funding must be available to ensure an appropriate level of security is maintained. Additional scanning or screening technology should also be considered, to address potential threat risk.

7) Policy 4 and proposals 15-17 set out the Mayor’s draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).

- **To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets? Please also describe any other measures you think should be included.**

Any reduction in vehicles at peak times will benefit the city’s economy and air quality. Similarly, as the way in which we buy goods changes to an on-line and delivery based model, the need for management of servicing and freight traffic is increasing. Freight consolidation and last mile partnerships have a role to play, but while they are voluntary, it will remain a fairly small role. Requirement through the planning process may have more impact, but this is yet to be fully tested.

Simple retiming of deliveries outside of peaks is worth consideration, where amenity and other potential disturbance to residents and businesses allows. During London 2012, deliveries to Stratford were retimed with little major impact on residents, resulting in the development of a revised servicing plan following the town centre improvement scheme, and the outcomes of this will be monitored.

There may come a time where the control of deliveries will be needed, and many central London offices have already banned their staff from receiving deliveries at their place of employment. Boroughs may have to take these sorts of measures at town centre level in acute circumstances, either through strict parking and loading enforcement or through planning condition.

8) Proposals 18 and 19 set out the Mayor’s proposed approach to road user charging (see pages 81 to 83).

- **To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.**

LBN considers the London Mayor’s approach to road user charging in this document to be a missed opportunity, and that the Mayor has avoided any potentially unpopular decision on road user charging in the document by instead deferring it to individual Boroughs to make instead.

Clearly, road user charging at a Borough level would be divisive and would be extremely difficult for a borough to promote in isolation, particularly with the likely displacement and social equity issues to adjacent boroughs. This needs London-wide direction which the Mayor is in position to provide.
Road user charging provides the opportunity to tackle London’s problems and indeed may be the only means of funding projects included in the strategy and its outcomes being delivered. The Mayor has chosen to selectively apply Road User charging to the Silvertown scheme (which coincidentally does not sit comfortably with many of the objectives of this strategy) but has backed away from making any decision to apply it wider across London.

Had road user charging been included, the likelihood of the objectives of this strategy being achieved would have been increased markedly, but instead, without it, the strategy is an unfunded list of aspirational projects with no prospect of funding for any but a small number of them.

If the Mayor is determined to tackle air quality, public transport investment and private car use, then removing one of the most significant transport planning tools to achieve those outcomes from those available is a completely flawed approach.

Road user charging will undoubtedly play a major role in addressing London’s problems in future years, and it is regrettable that the London Mayor has not shown sufficient courage to include it meaningfully in this strategy. Potential future charging schemes and workplace parking levies are not sufficient – these policies need to be specified and set out now, and not simply mentioned and then deferred. The severity of London’s transport problems demand more resolve from a London Mayor if we are to genuinely reverse trends, rather than simply slow the rate of deterioration. Without road pricing and other restraint policies, the strategy will only achieve the latter, which is simply not good enough for London.

9) Proposals 20 and 21 set out the Mayor’s proposed approach to localised traffic reduction strategies (see page 83).

- To what extent do you agree or disagree with this approach? Please also describe any other measures you think should be included.

While the Council supports the principles of road traffic reduction through traffic management, healthy street and liveable neighbourhood initiatives, and will continue to implement such strategies with its LIP and other funding, it is firmly of the view that it is not the role of individual local authorities to develop and implement their own road user charging or workplace parking levy schemes. It is clearly the role of the London Mayor to introduce transport strategies of this sort at a London-wide or sub-regional level and to assist individual local authorities with their implementation.

This is not the sort of leadership or resolve that London needs on this issue.

10) Policies 5 and 6 and proposals 22-40 set out the Mayor’s draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero-carbon city (see pages 86 to 103).

- To what extent do you agree or disagree that these plans would help London become a zero-carbon city? Please also describe any other measures you think should be included.
LBN supports the initiatives in these proposals, although it acknowledges that its own delivery role in achieving the stated outcomes is limited. We will work with TfL to tackle air quality hotspots and hope that funding will be directed to those areas where air quality demands action. We will also develop liveable neighbourhood schemes and healthy streets interventions that will seek to tackle emissions at source.

LBN is supportive of the Ultra Low Emission Zone and urges its early introduction. However it is important that the A406 remains the boundary, and no erosion of the outer boundary to exclude Blackwall and Silvertown from the ULEZ is supported.

The concept of emergency interventions, and their need is accepted by LBN, but we would need to fully understand the nature of the vehicle restrictions proposed and their consequential social and other impacts before we could support such interventions completely.

Electric vehicle charging policies are key to delivering air quality improvement and are to be broadly supported. However, there has been a significant hiatus over EVCP delivery following the demise of Source London, and the situation appears to have become a bit more fragmented London-wide as a result. It is urged that TfL take ownership of a London-wide electric charging point implementation programme and make funding available for Boroughs to deliver a network of residential charging points. In addition, a strategic network of rapid charging stations needs to be planned and implemented London-wide under TfL supervision and management.

TfL has not yet made contact with Boroughs regarding a widespread programme to introduce electric charging points at taxi ranks, despite the targets for a zero emission taxi fleet, and we would urge TfL to do so promptly, as the delivery of these is not entirely straightforward and may affect the achievement of fleet targets.

In general terms, it is important that the rate of the delivery of charging infrastructure does not impede the take up of new technology amongst London’s residents, so considerably more effort and funding will be needed in this area in the short to medium term. While a change in Government incentives for electric vehicles would be beneficial, London’s charging infrastructure is not currently ready for any such change.

LBN welcomes the initiatives to limit the pollution from non-road transport sources. As a borough on the Thames, emissions from water vessels is of particular significance and the Borough is supportive of environmental controls in this sector.

Finally, the Council recognises the restrictive environment on the Underground system and the control of pollutants in that particularly sensitive environment is to be welcomed, especially on the deeper lines serving the Borough (Central, Jubilee). In the current threat environment, deep tube environments or trains could also be potential targets for contamination, so there is a clear security aspect to this area of the strategy as well.

11) Policies 7 and 8 and proposals 41- 47 set out the Mayor’s draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).
• To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

LBN agrees with the proposals set out in this section, although there is a lack of detail provided in some areas. London’s transport network’s resilience to severe weather events is certainly something that requires improvement, but it is not clear what measures would be taken other than improved maintenance and reactive regimes, which will require investment and the source of this additional funding is not clear.

CONSULTATION QUESTIONS ON CHAPTER 4 – A GOOD PUBLIC TRANSPORT EXPERIENCE

12) Policy 9 and proposal 48 set out the Mayor’s draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling (see pages 118 to 119).

• To what extent do you agree or disagree that these plans would provide an attractive whole journey experience? Please also describe any other measures you think should be included.

This is a sensible approach, and indeed is one already adopted by LBN in its Crossrail and Stratford major schemes. Subject to the earlier comments about policy conflicts this approach is to be broadly welcomed. However, the widespread transformation of street environments across London will be a very expensive exercise and the document fails to mention any financial challenge to delivering this degree of improvement.

LBN’s three Crossrail schemes have required £7.5m of funding and the Stratford town centre improvement scheme will cost in excess of £17m, and London wide there is a whole host of further comparable schemes which require to be implemented if this objective is to be fully achieved. There is simply not enough funding available to deliver the numbers of schemes across London to deliver this objective, particularly as the Boroughs will be responsible for the delivery of most. To illustrate the scale of the funding issue, the Borough would have had to use either 5 years worth of its LIP funding or 4 times the suggested available funding through the Liveable Neighbourhoods programme to deliver the improvements at Stratford – and there are numerous projects across London in similar need of investment.

13) Policies 10 and 11 and proposals 49 and 50 set out the Mayor’s draft plans to ensure public transport is affordable and to improve customer service (see pages 121 to 125).

• To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport? Please also describe any other measures you think should be included.

Low fares are certainly desirable but there is also a financial reality which must be considered. There is already evidence that the TfL bus hopper fare, introduced by the London Mayor following his election, has had a significant negative impact on TfL revenue. Therefore, there is a difficult balance between funding the many other initiatives in this strategy alongside a fares freeze which effectively reduces TfL’s overall income in real terms.
In effect, this section of the document makes the achievement of many of the other objectives of the strategy increasingly unlikely, as it restricts the availability of funding for investment in other programmes. It is therefore advisable that a robust cost benefit assessment of the value of this measure is available for external scrutiny to determine its transport planning merit.

14) Policy 12 and proposals 51 and 52 set out the Mayor’s draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan (see pages 127 to 129).

- **To what extent do you agree or disagree that these plans would improve accessibility of the transport system? Please also describe any other measures you think should be included.**

This policy and associated proposals are considered uncontroversial and are to be supported. Improved accessibility of the transport system is a human right and network access must be improved across London.

However, regarding proposal 50c, it is hoped that sponsorship opportunities will be explored to provide any improved mobile phone coverage rather than TfL funding being used, as this is not a transport planning priority.

15) Policy 13 and proposals 53 and 54 set out the Mayor’s draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed (see pages 133 to 137).

- **To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.**

Subject to the earlier remarks about policy conflicts with other healthy streets objectives, LBN supports the protection of the bus network through bus priority interventions and the development of extended services to meet emerging demands. Buses have an ability to respond to short term changes in demand, and given that London is lagging behind in the delivery of major high capacity public transport interventions, the role of the bus will be important in supporting London’s growth until the major projects catch up.

The bus network plays an important role in London and particularly in Newham, so it is to be supported in broad terms. However, there are sometimes conflicts with other scheme priorities/objectives when providing a degree of priority for buses, so bus priority measures cannot necessarily be supported in every case. It is important that TfL appreciates this when considering Borough’s LIP schemes, and makes a considered and balanced decision based on the site-specific scheme objectives and outcomes rather than exercising any kind of veto on schemes which do not tick certain checklist boxes. Scheme assessment can never be as formulaic as this, and must adapt to the scheme under consideration.  

This ‘afterthought’ regarding buses is apparent in the discussion of them in the context of healthy streets. The document claims that “the Healthy Streets Approach will support buses by reasserting the priority of walking, cycling and public transport over private vehicle use, and taking an integrated approach to planning these complementary modes.” What this statement fails to acknowledge is that, where bus priority cannot be provided, in reality the healthy streets approach will assert walking and cycling over general traffic, including buses. Once again, LBN
appeals for some clarity over how such policy conflicts are to be considered and resolved, and where the responsibility for the final decision on schemes on Borough roads lies.

16) Policy 14 and proposals 55 to 67 set out the Mayor’s draft plans to improve rail services by improving journey times and tackling crowding (see pages 140 to 166).

- To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

While capacity enhancement and further development of the rail based public transport network is to be welcomed in general, we have specific asks in Newham and the east sub-region which are not specifically referred to in the strategy. In particular, the strategy is non-committal on any eastern extension to Crossrail 2 and merely shows a stub end off the main route at Dalston Junction with just an arrow pointing further eastwards – no eastern alignment is suggested, despite the work ourselves and other boroughs have done on making a case for an eastern extension. The need for Crossrail 2 to support growth in housing and employment in the east sub-region will require to be made strongly to ensure HM Treasury support for the scheme. TfL therefore needs to develop the best possible scheme which will be supported by Treasury and will deliver the most support to London’s growth – which we firmly believe is the Eastern Branch of Crossrail 2.

LBN notes with interest the selective quotes from the National Infrastructure Commission in relation to Crossrail 2 included in the document, and would suggest that the following quotation from the NIC report also be included:

“There may also be advantages to exploring the phasing of Crossrail 2 and to investigate the costs and benefits of each individual station. Although this review has not developed alternative options in detail, it would seem sensible that a couple of potential refinements could be reviewed in more detail (if not already undertaken) that could improve the BCR. These could potentially form part of a phased scheme. Firstly, exploring a potential refinement of a branch to the east where development growth is expected to be high, potentially as part of a second phase, or as an alternative to the New Southgate branch assuming proposed depot facilities can be relocated.”

There is a clear direction, backed up by the work undertaken by the Boroughs, that the National Infrastructure Commission believes that there is significant merit in an Eastern Branch of Crossrail 2, and which may have significantly improved outcomes in terms of growth and BCR over the New Southgate Branch.

TfL must therefore undertake a full and complete review of Crossrail 2 inclusive of an eastern alignment as an alternative to New Southgate or as a subsequent second phase. This review must be transparent and involve key stakeholders, including the Boroughs concerned.

In order to secure Treasury funding, the Crossrail 2 scheme needs to be the best that it can be for London, and LBN believes, along with the NIC, that this optimal scheme has not yet been achieved by the current proposals and that the feasibility and benefits of an Eastern Branch must be explored as a matter of extreme urgency, as the delivery of London’s growth is at stake.

TfL must also examine the set of circumstances that have led to the NIC proposing an alternative to the preferred alignment, and to the degree of dissatisfaction among Boroughs over the process that has been adopted to date in addressing the needs of the east sub-region. In particular, TfL must examine the degree of transparency, the degree of inclusion and the engagement with Boroughs in the sub-region to date and ensure that this is substantially improved going forward. If TfL cannot
demonstrate transparency in its approach to the planning of Crossrail 2 and the evaluation of costs and benefits, then support for the scheme is threatened not only from HM Treasury, but also from London itself. London simply cannot afford to build this desperately needed railway in the wrong place.

Aside from Crossrail 2, additionally, we have station capacity issues in the Borough which require to be addressed urgently, although no specific mention is made of these, nor is there any indication given of how such schemes will be funded. Stratford Regional station may take £100m to address, and there will be other stations across the network which will also require substantial investment, so again the source of funding for these costly schemes must be questioned.

The DLR and its continued expansion is essential to Newham, and growth of this mode is supported. However, LBN is concerned at the speed of the capacity enhancement programme, which has already fallen behind demand. DLR capacities on the Woolwich Branch are 120% of capacity in the AM peak already, and this is now hampering the delivery of growth in the Royal Docks. We are quite sure that many Boroughs across London will be making similar observations regarding transport provision being outstripped by emerging demand, and that the delivery of growth is being impeded as a result. Whenever this occurs, it demonstrates a failure in London’s land use and transport planning that must be addressed going forward.

In general terms, just to maintain the existing public transport experience within the challenging growth environment will take a significant amount of public transport investment - way beyond that identified in this strategy or the TfL Business Plan. Crossrail 1 will provide perhaps about 5-7 years of respite before that too is at capacity and the Jubilee and Central lines return to current levels, and yet a new intervention will take 20 years to deliver. Planning for Crossrail 3 and 4 needs to happen now, if London’s transport planning strategy is ever going to catch up with growth and demand.

This short term and limited approach to city planning and to the funding of infrastructure investment must change or it will result in diminishment of London as a competitive world city.

17) Policies 15 to 18 and proposals 68 to 74 set out the Mayor’s draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully inclusive and well-connected public transport system. The Mayor’s policy to support the growing night-time economy is also set out in this section (see pages 176 to 187).

- To what extent do you agree or disagree that these plans would deliver a well-connected public transport system? Please also describe any other measures you think should be included.

In relation to use of the river, this is a policy to be supported, subject to the appropriate designation of passenger and freight piers in Newham. LBN has already insisted on extensive use of the River Thames for any excavated material from the Thames Tideway and Silvertown Tunnel schemes, and can also appreciate the relief to existing transport networks in Newham that a passenger river boat service could provide – and protected piers exist where such services could operate (e.g. Royal Wharf). However, there has been no engagement by TfL with the Borough on any new potential services to date.

Regarding wider links in the south east, while broadly to be supported, there are some concerns over these proposals. Housing growth along certain corridors could cause crowding on services into London if public transport investment is insufficient. Growth on the Essex or Cambridge corridors
could cause issues at Stratford, for example. Proposal 71 fails to mention the HS1-HS2 link debacle nor does it refer to a potential for an Eastern Branch of Crossrail 2 to interchange with HS1 at Stratford. There is no mention of international trains stopping at Stratford International in this section of the document either.

Regarding coach facilities, LBN has some sympathy for TfL in finding a new location following the closure of Victoria, but unfortunately it is not a particularly attractive activity for other Boroughs to accommodate. TfL have approached Newham about locating a coach hub somewhere around Stratford, but we are not minded to accommodate development of this type in this location. Not only is Stratford no longer the appropriate location in land use terms for development of this sort, but it is considered that land values would also now be prohibitive for any facilities to be located in this area.

The promotion of the night time economy in London is to be supported, subject to the necessary arrangements for passengers safety and security being in place, and there being adequate staff to deal with any operational emergencies that may arise.

The proposals for increased regulation of taxi travel are to be broadly supported as there is a clear need for greater regulation, particularly in the private hire sector. With the increase in Uber and other similar operators there has been a significant increase in non-compliance with waiting and loading regulations and anti-social behaviour, with City Airport being an example. We would therefore welcome more regulation in this area, and we welcome the Mayor’s recent decision regarding Uber. While it is likely that the license will ultimately be issued, the Mayor’s action in forcing Uber to consider their activities and safety record is to be applauded.

CONSULTATION QUESTIONS ON CHAPTER 5 – NEW HOMES AND JOBS

18) Policy 19 and proposals 75 to 77 set out the Mayor’s draft plans to ensure that new homes and jobs are delivered in line with the transport principles of ‘good growth’ (see pages 193 to 200).

- To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

Good growth by its very nature is something to be supported – no-one will be a supporter of bad growth. Every land use and transport planner will sign up to the concept, and politicians are now in a position to be able to support most of the principles of good growth, even those in outer London. However, the investment required to ensure that growth is indeed classed as ‘good’ must be in place. Indeed, in the ideal case, the investment should happen long before the growth occurs, which questions even the more innovative developer-funded models of infrastructure investment.

Ideally, large scale borrowing should be available in advance of receipts from development, so that transport infrastructure investment and delivery can stay ahead of the growth curve and be delivered in advance of development to ensure good growth, with repayments to borrowings recouped from uplifted development and transport receipts. Greater public transport densities deliver greater development densities which in turn deliver higher development receipts and fare revenues, so the early investment in transport infrastructure makes perfect economic as well as planning sense in the long run.

This is a model that is currently being trialled in the Royal Docks Enterprise Zone, although it is yet to be proven as successful. Difficulties remain with certainty of forecasting of receipts and the liability
for borrowings, and also over the projects that should be supported and to what extent the agencies concerned must contribute and repay up-front funding. It is hoped that lessons learned from this exercise in the Royal Docks Enterprise Zone can be carried forward in planning for London and similar delivery models can be created.

19) Proposals 78 to 95 set out the Mayor’s draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving existing public transport services, providing new river crossings, decking over roads and transport infrastructure and building homes on TfL land (see pages 202 to 246).

- To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth? Please also describe any other measures you think should be included.

These proposals are addressed in turn below:

78. This is to be welcomed. LBN is supportive of the OAPF process and is liaising closely with GLA on the imminent Royal Docks OAPF. In addition, LBN already promotes sustainable travel and development in its development plans and has designated ‘Sustainable Transport Opportunity Areas’ based on PTAL and other characteristics to ensure sustainable, high density, mixed use development is delivered in these areas.

79. LBN has already made its views on the Crossrail 2 scheme as presented in the strategy in a previous section of this response. LBN considers that the opportunity to support growth in east London with high capacity infrastructure must not be missed. Transport planning is not about spreading investment evenly for political purposes, it is about building infrastructure where it is most needed. Crossrail 1 already serving east London is wholly irrelevant in a planning exercise for Crossrail 2 – it is about delivering a scheme which supports the growth of London most effectively. Investment and growth must correlate. LBN requires that TfL engages better and with greater transparency than to date with the relevant authorities to develop the optimal Crossrail 2 scheme and to fully examine the relative merits of a range of options to support London’s growth. A poorly conceived scheme not entirely based on transport planning need threatens the overall support for the scheme, both from HM Treasury or from a long list of Local Authorities and County Councils in and around London. This is too important a scheme for London for TfL to progress in the current flawed and secretive manner, and we have no confidence on the process adopted to develop the optimal scheme to date.

80. While LBN considers that the West Anglia Main Line is undoubtedly important, we believe that the Great Eastern Main Line also requires investment priority. This would create more train paths, especially between Colchester, Shenfield and Stratford to address severe overcrowding on these routes. TfL trains from Shenfield to Liverpool Street in the AM peak are frequently not making timetabled stops at stations in Newham (Manor Park, Forest Gate, Maryland) due to overcrowding on trains, with passengers held outside stations. This would not appear to be a good public transport experience for these passengers, either for those on the overcrowded trains or those watching them pass through their station without stopping.

81. LBN has no major view on the Bakerloo line extension, and defers to the key stakeholders and Boroughs concerned on this issue.
82. Any extension of Crossrail 1 (the Elizabeth Line) beyond Abbey Wood must not be at the expense of frequencies on the section of the route serving Custom House, or on the core route. Major demand east of Abbey Wood could significantly affect train loadings and congestion on the core section, and potentially undermine the overall benefits of the scheme to Newham residents. Extension of the DLR to Woolwich for example, simply meant trains were then full on arriving in Newham, and that extension clearly did not benefit existing DLR users in our Borough. It is not clear what detailed passenger modelling of such an extension has been undertaken and what evaluation of the wider line impacts has been undertaken, but these will clearly be needed to support such a proposal.

83. LBN has no major view on the Hounslow to Old Oak Overground extension provided that there is no impact on frequencies at Stratford or on the Gospel Oak to Barking branch and defers to the key stakeholders and Boroughs concerned on this issue.

84. LBN supports the investigation of new stations where their benefits outweigh any line wide impacts on journey times, frequencies, operating costs, etc. LBN supports the aspiration for a station on Crossrail 1 at London City Airport, subject to third party funding and no adverse impact on Crossrail services, and will work with the airport and key stakeholders to investigate the issue further.

85. LBN supports the principle of supporting major new transport investment by complementary changes to bus services, so as to ensure the benefits of the major investment are spread over a wider area. This is a principle currently being implemented at Custom House following the introduction of Crossrail in December 2018, and LBN is working with TfL to deliver the necessary bus infrastructure to accommodate additional terminating services.

86. TfL have already commenced engagement on a bus transit network for east London (East London Transit V.2) which could serve the Royal Docks, Barking Riverside and Dagenham growth areas. This could involve a new crossing of the River Roding at Beckton. We are supportive of this project, subject to details, as we were in its previous incarnation. A general traffic crossing of the River Roding could create some problems however, as it could be seen as a parallel route to the A13 leading to (potentially) the Silvertown Tunnel, and could have adverse traffic impacts on the Royal Docks Enterprise Zone. As implied previously, this is not the first study into this issue, and it is hoped that the outcomes of this study will be acted upon and implemented.

87. LBN is supportive of this concept, subject to there being no significant deterioration of other bus services or public transport opportunities in the area in question.

88. LBN has been engaged in a long and detailed process of engagement and negotiation with TfL over the Silvertown Tunnel and our views on the scheme have been made clear many times elsewhere. Unlike Greenwich and Tower Hamlets, Newham receives no benefit from the scheme whatsoever, and in fact suffers worse air quality and congestion as a result of the scheme than at present. LBN remains of the view that Silvertown does not sit comfortably within the MTS and is a legacy of the previous administration that cannot now be cancelled. It fails the very first proposal set out in this document, by not providing at all for pedestrians and cyclists, despite the requirements of proposal 1 and struggles to be consistent with a large number of the proposals subsequently, particularly those related to air quality, traffic reduction strategies, healthy streets and public transport. However, it is noted in proposal 88 that the pretence of the scheme being one with regeneration benefits has now been dropped. Just how much this scheme is in the strategy in order to generate money
(hopefully for other transport interventions) is not clear, and perhaps if this were explicit, the scheme may actually be more justifiable than it is from the attempts to integrate it into the rest of the strategy’s objectives. However, as stated LBN’s position on Silvertown has been made very clear to TfL and does not require further repetition here.

While LBN is supportive of new crossings, the explicit exclusion of road crossings here is not supported, particularly in the context of the Mayor’s enthusiastic support for Silvertown and its ‘wide-ranging benefits’. In fact Chief Officers have attempted to convince us that Silvertown was indeed a public transport scheme, quoting bus frequencies which TfL’s own officers bitterly fought against during the DCO hearing. However, as it appears that road crossings are in fact public transport crossings by TfL’s Managing Director’s own definition, perhaps the Boroughs have some hope that a road crossing could be delivered under this proposal. Otherwise, the Boroughs in east London are very unhappy indeed with this proposal and demand that highway crossings are investigated for their additional economic and regeneration benefit over public transport only crossings. There is no reason why the additional regeneration and economic impact of a highway crossing at Gallions cannot be evaluated now, as part of that ongoing DLR crossing exercise. There are clear additional connectivity, regeneration and economic benefits of a DLR and road crossing compared with a DLR crossing only, and a dual mode crossing could be more cost effective, as it could be part-funded by user charges (whereas a public transport crossing would require to be funded from TfL budgets). The Council therefore expects a modification of this proposal and demands discussions with TfL over the evaluation of river crossings in east London urgently.

LBN disagrees in the strongest possible terms with this proposal and considers it a major disappointment in the context of a number of discussions between the leaders of a consortium of Local Authorities in the sub-region and the Mayor and Deputy Mayor for Transport. It does not reflect the unified aspirations of the Authorities in the sub-region as expressed at those meetings, nor does it reflect the assurances given by the Deputy Mayor for Transport at those meetings. It is therefore not acceptable as a result, and could seriously damage the working relationship that the Borough has with the London Mayor. Neither the timescale suggested (which would in all reality be near to 2030 before a scheme would be even investigated – an age in transport planning terms) nor the conditions under which a scheme would be supported are acceptable to LBN and the wording of this proposal must be reconsidered, so as not to preclude the possibility of a highway crossing and to ensure consistency with the London Mayor’s support for Silvertown. It is interesting to note the Silvertown scheme in the context of this proposal, which sets out the terms (albeit a very long time in the future) under which any new road crossing would be considered after Silvertown. It is a matter for debate just how many of these criteria would actually be met by the Silvertown scheme, and it could be said that London may have to rely on the Secretary of State to ensure that even just one of them is met at all. This unfortunately shows a glaring inconsistency in the strategy and further illustrates just how far outside the rest of the MTS’s objectives the Silvertown scheme sits. The Boroughs concerned will not accept a change in ‘rules’ over river crossings following the delivery of Silvertown. This is simply TfL moving the goalposts after their own scheme has been implemented, and this is not acceptable. LBN therefore demands further discussion of this issue at a high level as a matter of extreme urgency to address these significant concerns over this fundamental issue in the east sub-region. We expect the Deputy Mayor for Transport
to engage with the Newham Mayor and Deputy Mayor personally, and immediately on this issue so that it can be resolved and the final strategy finalised.

91. (and 92) LBN supports the further development of TfL assets, subject to planning controls and guidance.

93. LBN thinks there may be some merit in this proposal, subject to a robust cost benefit assessment and the scheme being funded entirely from uplifted development value. It is not considered a major highway priority for TfL investment, as there are a number of congestion hotspots on the strategic road network around London more deserving of funding.

94. In many ways, the Boroughs are required to be better at this than TfL in order to fulfil their planning functions under legislation, and LBN welcomes TfL’s attempts to embed good growth into its procedures and guidance documents. We are also beneficiaries of TfL’s growth fund for bus priority measures in the Borough, so we are also supportive of that programme of small investments in public transport schemes. Capturing land value uplift to fund transport is key to helping fund the ambitious projects set out in this strategy and more work is needed in this area if the strategy is to ever come to fruition.

95. LBN supports the provision of improved links to airports as part of a wider modal strategy, and also supports the means of funding these proposed in the strategy.

20) Policy 20 and proposal 96 set out the Mayor’s proposed position on the expansion of Heathrow Airport (see pages 248 to 249).

- To what extent do you agree or disagree with this position? Is there anything else that the Mayor should consider when finalising his position?

LBN supports the necessity for improved transport links to any expanded London airport option, either Heathrow or any subsequent successor as a result of policy change.

CONSULTATION QUESTIONS ON CHAPTER 6 – DELIVERING THE VISION

21) Policy 21 and proposals 97 to 101 set out the Mayor’s proposed approach to responding to changing technology, including new transport services, such connected and autonomous vehicles (see pages 258 to 262).

- To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

LBN supports the objective for welcoming new systems and considers that London should be at the forefront of the development and implementation of innovative information and payment systems.

LBN is intrigued by this proposed analysis of kerb use and is keen to understand the various impacts of different models of car use. In particular, LBN is keen to understand the transport planning merits of a ‘floating’ car club model, where vehicles do not need to be returned to a fixed location but instead are located by GPS smartphone application. LBN remains to be convinced that this model of car club in a city such as London, does not simply replace trips that would otherwise be made by public transport or sustainable modes.

Demand-responsive buses are to be supported in order to meet balance demands with operating costs and also to provide important social connectivity. Dial-a-ride is a long established concept, and
the LBN regrets the shrinkage of the demand responsive network in recent years, but now welcomes this commitment to explore its use further. It should also be noted that this appears to duplicate Proposal 87.

LBN welcomes the deployment of new vehicle technology, subject to the necessary safety and other approvals. Newham was the location of the first fully autonomous vehicle trials (by Nissan) and worked with TfL and the MPS as well as the manufacturer to facilitate the trials. We are supportive of autonomous vehicles, subject to their evaluation and approval and believe they may have a significant role to play in maximising the capacity of strategic roads and also in the servicing and delivery sectors.

22) Policy 22 and proposal 102 set out the Mayor’s proposed approach to ensuring that London’s transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).

- To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

It is almost inconceivable in a strategy containing over 100 policies that only one of them, Proposal 102 deals with the funding of the strategy. In fact, the whole issue of funding is a major failing of this document and actual numbers have been avoided, as it is clearly wholly unaffordable, and this is touched upon further in the Borough’s concluding remarks. It is simply not sufficient in a strategy such as this to wish for a change in financial regulatory and other powers (which remain unspecified) in order for the strategy to be implemented. Any meaningful policy document must be firmly footed in the current reality of its operating environment and in financial reality but instead this document hopes for things to change and that TfL will have more money at its disposal in future to fund all the ambitious interventions that are set out in the strategy.

LBN does not share the London Mayor’s optimism regarding the likelihood of Treasury ceding further fiscal and regulatory flexibility to London, given our current financial realities as a nation post-Brexit vote. The strategy admits that “Additional sustainable funding sources and projectspecific grants are needed to deliver the aims of this strategy alongside contributions from London boroughs and the private sector” although little further detail is provided. LBN is particularly interested to know what financial contributions from Boroughs are expected in order to help deliver the strategy.

Notwithstanding these sceptical remarks regarding funding, the DRAM model is worthy of further investigation and may provide some scope for the delivery of some interventions in the strategy. And while LBN may be supportive of the devolution of additional fiscal and regulatory powers to the London Mayor in order to fund significant projects, it is not confident that this will happen in the term of this Mayor. If such monies were to become available by a change in fiscal arrangements, LBN’s recent experience on Crossrail 2 and river crossings suggests that it would have little confidence in TfL directing this funding towards the correct projects without significantly improved Borough engagement and scrutiny.

23) Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor’s approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283).
To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

The Borough accepts the role of the LIP process in delivering the aims of the MTS, although it maintains that an element of funding flexibility should be retained by Boroughs in annual LIP settlements. The Borough will be preparing a separate detailed response to the LIP3 consultation in due course.

CONCLUDING REMARKS

While many of the remarks in this consultation may appear critical, in fact, the aims of the strategy and the proposed interventions and measures are, in broad terms, completely supported by LBN. The Borough’s concern, besides the specific issues of River Crossings and Crossrail 2 (that TfL is already familiar with), is with the cost of delivering the strategy and how it is to be funded.

There is little debate amongst the transport planning community about the types of interventions that are required and the majority of them are set out in the strategy. There is a degree of disappointment over the lack of London-wide direction on user charging which would also have generated significant funding for the strategy while also delivering dramatic air quality improvement. However this is a failing of what is essentially a political rather than a true transport strategy document. It is understandable why a London Mayor would avoid difficult decisions which put widespread restraint of car use in a strategy, whereas an independent and apolitical transport authority might not.

While Mayor’s Transport Strategies remain associated with specific London Mayors, they will always be political in nature, and this attachment to a specific Mayor makes it easy for a strategy to aim high in terms of objectives, as ultimately there is no accountability to the Mayor concerned in the longer term. Long term funding of the plan is not really an issue, as it is not relevant to the Mayor concerned. So while the system remains as it is, this 4 yearly document will always be little more than a rolling wish list of unfunded aspirations that reflect current transport planning thinking mingled with the public mood of the day. As a policy document it contains some very useful ideas for implementation, but as a delivery plan document, it is questionable due to the lack of a credible funding plan.