

Consultation response:

Draft further alterations to the London Plan

Introduction

Since 1973, Campaign for Better Transport has been helping to create transport policies and programmes that give people better lives and support the environment. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

This document is a response to the consultation by the Mayor of London on proposed changes to the London Plan:

<http://www.london.gov.uk/priorities/planning/london-plan/draft-further-alterations-to-the-london-plan>

Our response is focused on transport issues and on the following documents published for consultation:

- Chapter 6 – London's transport
<http://www.london.gov.uk/sites/default/files/FALP%20chapter%206%20-%20London%27s%20transport.pdf>
- Tracked changes version of table 6.1 – Indicative list of transport schemes
http://www.london.gov.uk/sites/default/files/Table%206.1%20January%202014_0.pdf

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1. Changes we welcome

We welcome a number of aspects of the proposed alterations to policy, particularly the inclusion of new public transport and cycling projects. Changes we welcome include:

- **Legacy of the 2012 Games (paragraph 6.10).** However, much more could have been included on the lessons learned from the Games and achievements made in demand management, including mode and time shifting of journeys, and the success of travel planning with businesses and employers. We summarised some of these lessons in our report on football travel, 'Door to Turnstile' in 2013.¹ Our report cited evaluations carried out by the Olympic Delivery Authority showing considerable success in changing commuting patterns.² In terms of legacy, more specific policies should be introduced to use the Olympic lessons much more actively to reduce demand for road travel in conjunction with major events and trip attractors, such as the O2, Excel, sporting events, the West End and major shopping centres.
- **Commitment to Crossrail 2** (paragraph 6.18A)
- **More strategic and extensive cycling policies and schemes** (policy 6.9 and paragraphs 6.33 to 6.36). We will not comment on the detail of these plans, but it is very welcome to see outer London better included with these changes. However, we are concerned that in the list of schemes and planned investment (table 6.1) none of the new cycling commitments are extended in to the post-2022 period. Several schemes, including Greenways, Cycle Superhubs at railway stations, Cycle parking and Better Junctions appear to lose funding completely after 2016.

2. East London river crossings and new road capacity plans

We are opposed to major new road capacity provision in London and to the provision of new road crossings in East London. So we are very concerned that previous policies to investigate a range of options for this area have, in the alterations, been solidified in favour of road crossings.

Paragraph 6.41 is unchanged and still refers to the Mayor 'investigating the possibility of additional road-based river crossings in East London' and says '*He is committed to improving cross-river pedestrian, cycle and public transport links [and] to promoting a shift from private cars to more sustainable modes*'.

However, the range of options presented in paragraph 6.20, with the now-built and little-used pedestrian cable car removed from future plans, is now exclusively road-based and appears to be aimed at increasing road capacity for cars and increasing car dependency in this area, rather than offering alternatives.

During the most recent consultation on options for East London river crossings, which closed in February 2013,³ local residents and campaigners challenged the fact that only road-based options were put forward and, in response, Transport for London released a document showing other options late in the consultation period.⁴

¹ Door to Turnstile, Campaign for Better Transport, May 2013

http://www.bettertransport.org.uk/files/admin/Door_to_Turnstile_CfBT_FINAL_web.pdf

² Delivering Transport for the London 2012 Games. Olympic Delivery Authority, October 2012.

<http://learninglegacy.london2012.com/publications/delivering-transport-for-the-london-2012-games.php>

³ <https://consultations.tfl.gov.uk/rivercrossings/consultation>

⁴ East London River Crossings, Assessment of Options. TfL, Dec 2012

https://consultations.tfl.gov.uk/rivercrossings/consultation/user_uploads/package-assessment-of-options.pdf-1

There were no questions about these other options in the consultation questionnaire, which was very narrowly focused on whether respondents supported or opposed new road crossings at Silvertown and Gallions Reach.

The most recent update on the consultation website about TfL's response to this consultation includes the following key conclusion:³

"Making clear that there is a strong appetite within the public and stakeholders for TfL to consider crossing improvements for cyclists, pedestrians and public transport users;"

Yet nowhere in the alterations to the plans is this conclusion reflected. In fact, by adding the text 'including Silvertown tunnel' to table 6.1, the alterations appear to further exclude alternatives that would benefit these groups (the tunnel would not be open to pedestrians or cyclists and would be of minimal benefit to public transport users compared with a dedicated link).

We would like to see the plan altered to keep options for crossings in East London much more open, in line with commitments made during the consultation, and since.

3. Incorporation of the Roads Task Force findings and report

We have read with interest the report of the Roads Task Force published in July 2013,⁵ and TfL's response.

Some of the ideas in the report are encouraging, and we regard the 'London street-types framework' as a much more promising way to look at streets in the round, including their function as places, and walking, social, business and cultural environments not simply as travel corridors. We support the changes to the wording of policy 6.11B.

However, some other aspects of the Roads Task Force report are more worrying, including the apparent desire to accommodate traffic growth, particularly for through-traffic, by building new capacity and the extensive use of tunnelled bypasses.

Quite apart from our opposition to policies of 'predict and provide' road-building, particularly in urban areas such as London, these proposals appear problematic even on their own terms for reasons of cost and the severance and environmental effects of providing suitable entrances, exits, junctions and slip roads for any new tunnels. In addition, the Roads Task Force report and the TfL response both appear to acknowledge there may be serious problems with these plans in practice due to these issues. No detailed proposals along these lines have been presented and no assessment has been carried out of the potential impact of these plans on the economy or the environment.

We therefore disagree with the alterations to the plan that seek to turn the recommendations of the Roads Task Force into planning policy at such an early stage of development (paragraph 6.39) when there is a strong likelihood many of their recommendations and proposals may not be suitable or practical for London.

We are also opposed to the amendment to policy 6.11A, which effectively compels boroughs to incorporate the RTF findings into their own local development plans. It currently says:

⁵ The vision and direction for London's streets and roads. Roads Task Force report, and TfL response, July 2013, <http://tfl.gov.uk/roadstaskforce>

"The Mayor wishes to see DPDs and Local Implementation Plans (LIPs) take a co-ordinated approach to smoothing traffic flow and tackling congestion through implementation of the recommendations of the Roads Task Force report. The Mayor will use his powers where appropriate."

4. Lower Thames Crossings

No amendments are planned to paragraph 6.41, but we believe that this paragraph should be amended in the light of the evidence presented to accompany the recent consultation on options for new Lower Thames Crossings.

Our response to this consultation showed that car dependency in the boroughs of Havering and Bexley, near the current Dartford Crossing was much higher than average for outer London boroughs and we believe that this should be tackled by improving alternative modes and improving access by public transport, not made worse by doubling the number of traffic lanes across the Thames at Dartford, or beyond.⁶

There is also a much stronger legal case for action to improve air quality since the Supreme Court ruling of May 2013 that the UK was in breach of its obligations to take urgent action on air pollution to protect public health. All options for the Lower Thames Crossing were found to worsen air quality in an area already highly polluted.

Therefore, we believe that any amendments made to the London Plan should now be removing any commitment from London to support Highways Agency schemes for new crossings.

5. Weakening/abolition of maximum parking standards

Finally, we are strongly opposed to the changes made in Policy 6.13 to weaken (in fact effectively abolish) maximum parking standards for planning applications.

As well as increasing the maximum provision of parking spaces in residential developments, the policy wording changes in 6.13C (from 'should be applied' to 'should be the basis for considering') are such as to make these completely non-binding for developers and those considering local applications.

This policy change is irrational in the light of recent reductions in car ownership rates in London, and nationally, and also risks encouraging more driving and more car dependency, when the growing population of London makes it even more important that the positive recent changes in driving patterns and traffic levels in London must be preserved and encouraged to develop further.

Research carried out for the Department for Transport, among other evidence, shows that maximum parking standards lead to a reduction in traffic demand, while having no impact on economic development. Key conclusions of a review of evidence presented in the DfT study included:⁷

"i) Restricting parking numbers leads to a reduction in demand

⁶ Lower Thames Crossing consultation response. Campaign for Better Transport, July 2013. http://www.bettertransport.org.uk/files/Lower_Thames_Crossing_july_2013.pdf

⁷ Research into the Use and Effectiveness of Maximum Parking Standards, Atkins for the Department for Transport, June 2008 <http://webarchive.nationalarchives.gov.uk/20111025111955/http://www.dft.gov.uk/publications/maximum-parking-standards>

ii) Modelling has shown that parking is a more effective demand management tool than public transport fare reductions

[...]

xiv) There is no evidence that relaxing parking standards improves economic performance"

The Mayor and TfL need to look carefully at the evidence against the proposed changes to parking standards and policies before committing to a change that may reverse a positive trend and increase congestion, for none of the intended economic benefit. The changes to the policy are reproduced below, and we would ask for these to be reversed and the original policy retained. We would also want the numerical standards for residential and commercial developments to be tightened rather than weakened.

"C The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be **the basis for considering** applied to planning applications."

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