

Mayor of London’s draft Transport Strategy ~ Response from Campaign for Better Transport

September 2017

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to contribute to the development of the Mayor of London’s Transport Strategy (MTS).

Consultation questions	Response from Campaign for Better Transport
<p>1). <i>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.</i></p>	<p>Getting transport right is not only vital for the sustainability of the transport system but is also central to addressing the challenges London faces now and in the future.</p> <p>We share the draft MTS analysis that focuses on cutting motor traffic, boosting public transport and active travel as part of delivering sustainable growth by accommodating more people and fewer cars.</p> <p>Breaking the false link between economic growth and traffic growth is central to London having a sustainable future. London has demonstrated over the years that economic and population growth can be delivered without equivalent traffic growth, with regeneration of the Docklands, for example, enabled by investment in high quality public transport.</p> <p>In addition London faces environmental and public health challenges from climate change, air pollution and inactivity to which we believe affordable, reliable, accessible public transport for all and a high quality network of spaces for people to walk and cycle are an important part of the solution.</p> <p>London faces significant economic and demographic change. The impacts of Brexit are uncertain but likely to provide fresh financial challenges, at a time when central government grant is being withdrawn from TfL.</p> <p>Social inclusion and access to housing are major challenges as are the needs of an ageing population with increasing levels of physical challenge: for example, the RNIB predicts that by 2020 the number of people with sight loss will rise to over 2,250,000.</p> <p>In addition technological changes bring both opportunities for better access to and planning of transport and mobility services but also fresh challenges on managing congestion from competing providers on London’s busy streets.</p>
<p>2). <i>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</i></p>	<p>Campaign for Better Transport’s vision is a country where communities have affordable transport that improves quality of life and protects the environment.</p>

<p><i>those people to live and work in. The aim is that, by 2041, 80% of Londoners' trips will be made on foot, by cycle or using public transport.</i></p> <p><i>To what extent do you support or oppose this proposed vision and its central aim?</i></p>	<p>We strongly welcome the MTS vision of creating liveable places with healthy streets and proposals to address car dependency, with the goal of having 80% of Londoners' trips made on foot, by cycle or using public transport, however we would support bringing this forward.</p> <p>We would like to see milestone measures in place, to help achieve this target as soon as possible, with 2041 as the latest date rather than the earliest target: in addition we note that whatever the target date, action needs to start now in order to have the right infrastructure and the right balance of investment to deliver this highly desirable outcome.</p> <p>Provision of better public transport, walking and cycling options that are accessible, reliable and affordable has a direct, beneficial impact on reducing traffic and congestion. This includes providing dedicated space for walking and cycling, and flexible ticketing options for public transport that provide fair fare options for part-time workers.</p> <p>In addition, land use planning and parking management play a critical role. London's housing crisis is well known: using land to house cars rather than people is woefully inefficient, and fosters greater car dependency, reinforcing social and economic exclusion for people without access to a car.</p> <p>We are disappointed that the plans for the Silvertown Road Tunnel are still included: this will increase traffic volumes through neighbourhoods already suffering heavy traffic levels with knock on effects worsening congestion, CO2 emissions, road danger, and poor air quality. Building major new roads will inevitably undermine the positive goals of the MTS. We urge the Mayor to reconsider this damaging new road scheme.</p>
<p><i>3). To support this vision, the strategy proposes to pursue the following further aims:</i></p> <p><i>To what extent do you agree or disagree with the aims set out in this chapter?</i></p>	
<ul style="list-style-type: none"> ● <i>By 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day</i> 	<p>We support the overall aspiration for more active travel, but want to see this target for 2030, in line with the goals set by Public Health England.</p> <p>As with the Government's Cycling & Walking Investment strategy, the vision is welcome but must be matched with the political will and financial resources to deliver it.</p> <p>Delivering this target means providing safe and attractive networks and places for people to walk and cycle, with a London-wide reallocation of road space from cars to people walking and cycling and dedicated funding for measures at borough level.</p> <p>We note that for some Londoners (e.g. people with a disability) a specific target of 20 minutes a day may not be appropriate. Therefore targets for appropriate access to walking and cycling facilities as well as targets for activity should be included.</p>
<ul style="list-style-type: none"> ● <i>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</i> 	<p>We support measures to make bus operation safer for bus passengers and other road users. With well-designed streets, making good use of bus priority and transport technology, and placing well timed crossings at desire lines, safety should not be at the expense of a high quality, frequent and reliable bus service.</p> <p>To achieve the aspiration (one we obviously support) that no-one should be killed in buses (or indeed in any other form of public transport) is not just a matter of road safety but of wider public safety, addressing issues of antisocial behaviour and violent crime: this will require adequate levels of staffing and policing as well as safer operation of buses.</p>

<ul style="list-style-type: none"> 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 	<p>We welcome the aspiration in the Mayor's Transport Strategy that London's entire transport system should be zero emission, but feel the timescales are unambitious (all taxis and private hire vehicles to be zero emissions capable by 2033, all buses to be zero emission by 2037, 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). London's air pollution crisis requires action on much faster timescale with implementation as soon as possible and certainly by 2030.</p> <p>We strongly support practical measures to deliver a greener bus fleet. Innovation across the sector is seeing greener buses already on the road not only in parts of London but also in Brighton, Nottingham and York among others. However providing the infrastructure needed to fuel zero emission buses and taxis will require support, as may individual operators in making the up-front investment in new fleet. Any national or London-specific scrappage scheme should focus on buses and taxis as part of the public transport fleet rather than private motor cars.</p>
<ul style="list-style-type: none"> 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 	<p>We strongly support having an explicit target for reducing motor vehicle kilometres. The UKCCC sets a target of cutting car road miles by 5% beyond current base by 2050. It is not clear how the MTS proposal to cut approximately 6m vehicle kilometres a day relates to the UKCCC target. However we note that the MTS proposes a shift in daily mode share for private motor vehicles from 36% of 26.7m daily trips (approx. 9.6m trips) in 2015 to 20% of 32 m daily trips (approx. 6.4m trips) which assuming similar trip lengths would be a cut of one third. We strongly welcome this approach.</p> <p>As above we would like to see measures to achieve this target as soon as possible, with 2041 as the latest date rather than the earliest target. In addition we note that whatever the target date, action needs to start now in order to have the right infrastructure and the right balance of investment to deliver this highly desirable outcome.</p>
<ul style="list-style-type: none"> To open Crossrail 2 by 2033 	<p>We support Crossrail 2 as part of an integrated public transport network across the capital. We note that the case for Crossrail 2 is linked to its potential to unlock new housing sites and support the approach that new homes should be located where public transport links are already in place or are fully This is vital to deliver the MTS traffic reduction goals.</p> <p>Crossrail 2 should not be developed as a tube/rail line in isolation but as part of a network of sustainable transport hubs with public realm improvements. We welcome the idea of a network of outer London mini hubs built around good local interchanges for Crossrail2 and for other existing and planned lines.</p>
<ul style="list-style-type: none"> To create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor 	<p>We welcome this approach: we strongly support the view that all suburban rail services should be integrated and in the London context it makes sense for this integration to be within the TfL family. This would provide the opportunity to address current fare anomalies, to better integrate suburban rail with other public transport and to make the services offered more democratically accountable.</p> <p>Our research into London Overground and Merseyrail has demonstrated the benefits of such transport devolution. Both are successful rail operations and have improved significantly since the previous arrangements. Their performance in terms of punctuality and reliability is good, and the passenger satisfaction is among the highest on the rail network - see www.bettertransport.org.uk/sites/default/files/research-files/GoingLocal.pdf for more information.</p>
<ul style="list-style-type: none"> To improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport 	<p>Step-free access brings benefits for all Londoners including disabled and elderly people, people travelling with small children, and travellers with suitcases, and enables efficient use of escalators and corridors at busy times.</p> <p>We would prefer to see a target for a 100 per cent accessible network,</p>

<p><i>journey on the step-free network compared to the full network</i></p>	<p>prioritising rail, light rail and bus accessibility, including step-free access. We do not believe that the 40% by 2022 target is sufficient. We would like to see a roadmap towards 100% step free access with milestones along the way, such as goals for progress in 5 years, 10 years etc. Other transport systems, for example in Vienna, have successfully adopted a time- bound accessibility plan.</p> <p>TfL should look proactively for opportunities to access third party funding to make this possible, for example the step-free access at Tower Hill tube was facilitated by planning gain from an adjacent hotel development.</p> <p>Step-free access is vital but attention also needs to be given to minimising the distance needed to walk. This is equally important to making the system accessible to more people, particularly older people or people whose disability means they can and do walk but cannot do so over long distances. Some station lifts (for example at London Bridge) are at the end of long corridors, while others (for example at Kings Cross) require multiple changes involving long walks between lifts. Ideally step free provision would be designed to minimise the distance between interchange points: at the least there should be improved information, for example step counts on signs and maps so that people can make informed journey choices.</p>
<ul style="list-style-type: none"> <i>To apply the principles of good growth</i> 	<p>We welcome the priority given to good growth, including a focus on car-free places and carbon-free travel. We would like to see explicit links from the MTS to targets for CO2 reduction and for new jobs and homes in the other Mayoral strategies, underlying that it is both possible and desirable to decouple economic growth from growth in motor traffic.</p>
<p><i>Please let us know if you have any comments you would like to make on the aims of the strategy.</i></p>	<p>We welcome the commitment to linking the MTS with other mayoral strategies, including those on housing and the environment. This is the best way to deliver the MTS positive vision of a high quality, low carbon transport future in a liveable and sustainable city.</p>
<p><i>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 let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>Walking and cycling are recognised by the Government as a highly desirable transport choices with the aspiration in the national Cycling and Walking Investment Strategy that they become the normal choice for shorter journeys. We welcome the prospect of real action in the MTS to make this a reality across London.</p> <p>We support measures to extend pedestrianisation to London's high streets, including Oxford Street, and local centres, along with improved networks of walking and cycling routes between local centres and across central London. These are best designed and delivered with the active involvement of user led groups, for example planned in line with 'desire lines'.</p> <p>Cycling and walking provision should be coordinated with bus route planning and design to deliver an integrated public transport system that complements active travel options and provides all Londoners with real alternatives to car dependency.</p> <p>London has a good basis from which to build, with the successful record of cycle superhighways, Quietways and on street bike hire. We support a London wide rollout of bike hire schemes, with a particular focus on provision around outer London rail stations and bus interchanges.</p> <p>The MTS will require leadership and funding to reallocate road space and upgrade public realm so as to create safe networks and attractive spaces for people of all ages and fitness levels to enjoy walking and cycling.</p> <p>Delivery plans for walking and for cycling with milestone targets, championed by the relevant Commissioners and with appropriate resourcing, will be important to see the aims of the MTS delivered in</p>

	practice.
<p>5). <i>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?</i></p> <p><i>Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>We welcome the focus on safety and the target zero approach to deaths and serious injuries, including 20mph default speed limits in all appropriate locations across London.</p> <p>We welcome moves to a co-ordinated approach with boroughs and the Metropolitan Police on education, information and enforcement to give active travel appropriate safety and priority.</p> <p>For example, this should include measures to remove dangerous HGVs from London streets; uphold bans on pavement parking; uphold pedestrian priority at crossings; and enforce safe passing distances to protect cyclists.</p>
<p>6). <i>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?</i></p> <p><i>Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>It is important that the MTS plays its part in improving not only road safety but also wider public safety, addressing issues of antisocial behaviour and violent crime: this will require adequate levels of staffing and policing as well as better street design and lighting and more consistent enforcement of traffic offences.</p> <p>We believe that the safety of women and other potentially vulnerable groups is best served by tackling anti-social behaviour and seeking to make public transport safe for all users at all times.</p>
<p>7). <i>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?</i></p> <p><i>Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>We support moves to prioritise space-efficient modes of transport in particular the aspiration to make greater use of the rail network and river for freight. Recent National Travel Survey statistics show that car trips are falling, while there is growth in both HGV and LGV traffic volumes.</p> <p>There is a strong environmental and efficiency case for boosting the use of rail freight. Rail freight produces 76 per cent less CO2 per tonne carried than the equivalent road journey. Fully laden HGVs are 160,000 times more damaging to road surfaces than the average car. Transferring 2000 lorry loads a day to rail would be the equivalent of taking 8000 cars off the road.</p> <p>We would like to see greater emphasis in the MTS and the London Plan on the need to allocate and deliver sites for rail freight interchanges and terminals, without which significant demand for rail freight will be continue to be suppressed and its considerable benefits unrealised.</p> <p>We strongly support moves to encourage co-operation within and between boroughs, BIDs and other bodies to consolidate deliveries. We advocate an accelerated rollout of smarter last mile delivery and area-wide servicing plans, to co-ordinate delivery times and promote shared use of vehicles. The Regent Street scheme is a successful example where retailers direct their suppliers to a joint consolidation centre, with final delivery then made to stores in shared low emission vehicles.</p>

	<p>Car clubs are valuable in tackling congestion as they provide an alternative to individual car ownership, and operate on a pay as you go basis, encouraging more targeted usage. CarPlus, the car club industry body, calculate that over 25,000 privately owned vehicles have been removed from the roads as a result of car club membership. In addition LGV options reduce costs for and congestion from the growing small business sector. The Mayor and TfL have a range of tools to encourage car club parking provision, including through planning requirements and by requiring provision for car clubs in TfL-funded traffic management and/or parking schemes and on TfL land.</p> <p>We commend to TfL these and other examples that were included in our evidence submission to the London Assembly Transport Committee's congestion inquiry (see http://www.bettertransport.org.uk/blog/better-transport/cure-londons-congestion).</p>
<p><i>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 the proposed approach to road user charging? Please let us know if you have any comments you would like to make on the proposed approach and please also describe any other measures you think should be included.</i></p>	<p>We support the principle of usage-based road pricing. Such schemes help make best use of road space, cut congestion, reduce illegal levels of air pollution and free up space for public transport and active travel in a greener and more pleasant city.</p> <p>Owning a car in London is an expensive choice: on average £3k a year to own and £18.88 per hour driving to operate. Owner-drivers make a high cost investment in their vehicle, including purchase price, tax, insurance, depreciation and parking, but, fuel apart, do not pay per use: the greater the number of trips, the smaller relative cost per trip to the user. This contrasts with the 'pay as you go' model of car clubs, taxis and public transport. In utilitarian terms, individual motor vehicles are highly inefficient users of road space, compared with buses, cycling or walking, yet there is no financial reward or incentive on travellers to make that choice.</p> <p>In addition, the lack of a 'pay as you go' model for road transport means that motor vehicles do not pay the cost of their impact in terms of carbon emissions, air pollution or road maintenance. Road user pricing reflects the principle that those who contribute to congestion and environmental problems should help pay for the costs to society this causes. A usage-based regime moves closer to the concept of 'mobility as a service' where travellers make smart choices for each journey based on convenience and price, rather than being invested in a single mode.</p> <p>We note that the argument is sometimes made that such charges would discriminate against lower income users, as any fixed charge is inevitably regressive in nature. However it is important to note that London pensioners, people with disabilities, young people and other groups have free or discounted access to public transport, reducing their need for car use. The poorest households will not be the most impacted, because they are least likely to have cars. 46 per cent of London households do not have a car, and the general trend is for household car access to rise as household income increases. Car ownership is lowest in the lowest income households, with a majority of households at or below London Living Wage income having no car.</p> <p>We favour keeping the congestion charge zone and ULEZ under review, with a view to increasing their coverage and varying the charge levels so as to remain effective. The Congestion Charge is a vital part of managing traffic in London. Without it, current levels of congestion on the road network would almost certainly be far worse. However, the Charge is now less effective than when first introduced and as TfL figures show, it is now managing traffic growth rather than deterring it. It is important to keep the Congestion Charge under review to ensure that its pricing level is appropriate, and to ensure that it is collected efficiently.</p>

	<p>It may be appropriate to add additional Congestion Charge zones within London, not necessarily adjacent to the central London zone, in response to specific local need, for example around Heathrow Airport. However, we believe that other options such as usage-based road pricing (that could be piloted on key routes), and workplace parking levies around employment zones in outer London boroughs, would provide even more effective options as part of a London-wide approach.</p> <p>Road pricing schemes should be designed to deliver environmental as well as traffic reduction goals, enabling London to tackle both pollution and congestion in a smart and transparent way, while generating vital revenue for greener transport alternatives, public transport, low carbon transport, active travel and improved public realm.</p>
<p>9). <i>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 let us know if you have any comments you would like to make on the proposed approach and please also describe any other measures you think should be included.</i></p>	<p>Boroughs will play a vital role in delivering the MTS aspirations to cut traffic and deliver significant moves away from car-based travel.</p> <p>The success of the mini Holland scheme in Waltham Forest and other local traffic reduction and cycling provision initiatives shows that partnership working with boroughs can deliver significant positive results.</p> <p>As well as comprehensive borough-wide strategies, we also see a role for smaller scale initiatives including pilot schemes that can start making the transition to low car dependency as soon as possible. For example, the school streets initiative in Camden is an innovative approach, closing some streets leading to primary schools at peak times.</p>
<p>10). <i>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 let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>We strongly support moves to make London's transport systems low emission and ultimately emission free and zero carbon and believe this must be done at the earliest possible opportunity. We believe that all Londoners are part of a shared community: we each have the same rights to breathe clean air and the shared responsibility to play our part in delivering clean air.</p> <p>Polluting vehicles are no less polluting if driven by residents as opposed to visitors, and delivering cleaner air requires action on all motor vehicles. Charging zones are not only the most effective way to tackle air quality but also the fairest, as the lowest income Londoners are the least likely to own or have use of cars, yet are most likely to suffer the ill effects of air pollution.</p> <p>The MTS should include programmes to share information and provide support for the many alternative options available, such as enhanced active travel and public transport options, or car club membership, rather than simply purchasing a newer vehicle.</p> <p>Many of the solutions to air pollution also address CO2 concerns, noting new research that indicates that diesel vehicles are not only the main source of NOx emissions but are also larger scale producers of CO2 than was previously thought. Lifecycle analysis taking into account production costs and typical mileage proves that diesel cars emit 3.65 tonnes more CO2 over their lifetime than a petrol equivalent.</p> <p>Electrification of the vehicle fleet is a necessary step but not the whole solution, as there will still be particulate emissions (PMs) from tyres and braking systems. Vehicles are only as green as the source of their energy generation. The MTS must continue to champion fewer cars not only newer cars as part of its comprehensive low carbon approach.</p> <p>We are disappointed that the plans for the Silvertown Road Tunnel are still included. Building major new roads will inevitably undermine the positive goals of the MTS in terms of reducing CO2 emissions and improving air quality. We urge the Mayor to reconsider this damaging new road scheme.</p>

<p>11). <i>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).</i></p> <p><i>To what extent do you agree or disagree that these plans would achieve this?</i></p> <p><i>Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>Climate change is a threat to us all: it is already affecting the operation and maintenance of the transport network with increased instances of extreme weather and flooding. Growth in CO2 emissions and development of land in London's flood plains, combine to increase the future risks of major disruption.</p> <p>The MTS and London Plan should coordinate to minimise development on floodplains. New infrastructure developments and improvements to public realm should incorporate SUDS (Sustainable Urban Drainage Systems) as standard and look for opportunities to increase tree planting, the use of green walls and green/brown roofs and the use and generation of renewable energy. TfL's land and property can make an important contribution as seen in the solar panels at Vauxhall bus station and the green roofs and wind turbine at West Ham bus garage.</p> <p>We welcome the commitment to address noise and vibration. The World Health Organisation (WHO) has reported that noise is second only to air pollution in the impact it has on human health, causing not only hearing loss, but also of increased stress and sleep disturbance, leading to increased risk of heart disease, stroke, and poor mental health.</p> <p>Noise barriers, while effective and essential in some locations, can be visually intrusive. Greater use could be made of natural barriers such as tree screening at sensitive locations. Dense planting can achieve a reduction of 3-5 dB A road noise per 100 feet according to the US Department of Transportation.</p> <p>Ideally noise pollution should be addressed by reducing the noise at source. This should include not only electrification of the transport fleet but also ensuring major roads are resurfaced with noise reducing surfacing with priority given to areas where noise affects the highest numbers of people.</p> <p>We are disappointed that the plans for the Silvertown Road Tunnel are still included: by increasing traffic volumes through neighbourhoods already suffering heavy traffic levels with knock on impacts on the environment including road noise. Building major new roads will inevitably undermine the positive goals of the MTS. We urge the Mayor to reconsider this damaging new road scheme.</p>
<p>12). <i>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).</i></p> <p><i>To what extent do you agree or disagree that these plans would provide an attractive whole-journey experience?</i></p> <p><i>Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>An effective transport strategy will recognise that people make end-to-end journeys by a mix of modes, and make travelling by sustainable modes as easy as possible. This will include smart ticketing and fair fares as well as attractive places.</p> <p>We support the principle of designing healthy streets with smooth interchanges and liveable places to encourage modal shift. This approach needs to go beyond public realm design, and also look at factors that affect the safety and affordability of active travel and public transport, and we welcome the inclusion of these factors elsewhere in the MTS.</p> <p>Joining up with the planning system is also vital so that the location of homes, services and jobs will mitigate the need for people to travel long distances, and their design focuses on encouraging walking and cycling, easy interchange with public transport and suppression of car dependency.</p>
<p>13). <i>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).</i></p> <p><i>To what extent do you agree or</i></p>	<p>We support the principle that public transport fares should be affordable to users and support a sustainable network.</p> <p>Our approach to fares is that they should be cheaper, fairer and simpler. We want to see regulated rail fares fall over time to come closer to the European average and with any increases linked to CPI rather than RPI.</p>

<p><i>disagree that these plans would improve customer service and affordability of public transport? Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>We recognise the need to balance fare reductions with the need to invest in a modern public transport network, with reliable services for everyday travel that are not overcrowded and that provide good value for money.</p> <p>We recognise the positive impact that the Oyster card, daily pay as you go caps, and the new bus hopper fare have had. It is important that the technology works consistently to ensure that all users benefit. Good quality bus information and flexible ticketing are important to maintain and increase bus usage. We welcome the introduction of the bus hopper ticket and would encourage TfL to introduce a part-time travel card to benefit the many Londoners who work flexible hours.</p> <p>We would like to see Oyster and/or contactless payment extended to include bike hire and car club schemes.</p> <p>As mobility as a service options become more of a feature of London's transport offer, we want to see TfL take a lead in ensuring such services are accessible and make a positive contribution as part of London's transport family. In particular it is important that any car-based services are safe, affordable and are deployed to complement public transport provision, without generating increased traffic and congestion in already busy areas.</p> <p>Improved customer service means protecting levels of trained, visible members of staff, who provide a service that cannot be adequately replaced with help points or CCTV alone. We support disability equality training for all senior TfL staff, and those involved in service planning as well as front line customer-facing staff: to be effective, such training should be delivered by older and disabled people not actors. There is a wealth of expertise among disability-led groups including Transport for All, RNIB and SCOPE, that can contribute to making this goal a reality.</p>
<p><i>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 let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>We support the approach to accessibility outlined in the MTS including an Accessibility Implementation Plan.</p> <p>There are a number of practical measures that could improve accessibility across modes.</p> <p>These include:</p> <ul style="list-style-type: none"> • requiring buses to have separate identified space for wheelchairs and buggies, as is the case in Edinburgh, Cardiff and Oxford • installing and maintaining hearing loops at all ticket machines, with a priority for stations where ticket offices are unstaffed or staffed on a part-time basis, so that deaf / hard of hearing people have a place at each station where they can always speak to a member of staff • investigate automatic ramps on new train rolling stock, as in Liverpool • ensure that there is good quality tactile edging at every station edge, and that this is maintained once installed • a maintenance and servicing programme to improve station lift reliability; without prompt repairs stations which in theory are step-free become effectively out of bounds for months to disabled people and passengers with buggies, suitcases, etc • a one-stop web-page on lift status on the TfL website rather than having to check separately for each tube line • more seating and better maintenance of existing seats bus stops and stations, as well as more shelters at outdoor interchanges: on the same basis that priority seats are provided on buses and trains, there should be a recognition that older people, pregnant women and people with disabilities, cannot stand for long at stops and stations.

<p>15). <i>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 let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included</i></p>	<p>We support these proposals, particularly moves for more bus lane priority. Buses are an essential part of London's public transport and have far greater potential to adapt to meet changing needs than rail or other fixed link services.</p> <p>However changes to bus routes must be well planned in advance with clear and consistent information on the new services and alternative options.</p> <p>We welcome a proactive approach to planning new or revised bus routes, including working with destinations such as hospitals. There is great potential for using travel data (such as analysing trip origin and destination information from mobile phone signals as piloted in Northamptonshire) to identify and respond to unmet demand for new services. In particular this could be used to develop orbital routes in outer London including express routes, as well as local connections to new housing and employment sites.</p> <p>We would like to see a comprehensive programme to deliver improved design, more seating and better maintenance of bus stops and station waiting areas, as well as more shelters at outdoor interchanges: on the same basis that priority seats are provided on buses and trains, there should be a recognition that older people, pregnant women and people with disabilities, cannot stand for long at stops and stations.</p> <p>It is important that bus stops on major roads are safety located, with crossing points nearby, recognising that passengers are highly likely to be crossing the road at the start or end of their journey, and that the good work of designing high quality bus bypass for cycle routes continues.</p> <p>Good quality bus information and flexible ticketing are important to maintain and increase bus usage. We welcome the introduction of the bus hopper ticket and would encourage TfL to introduce a part-time travel card to benefit the many Londoners who work flexible hours.</p>
<p>16). <i>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 let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>We support the principle that public transport fares should be affordable to users and support a sustainable network.</p> <p>Our approach to fares is that they should be cheaper, fairer and simpler. We want to see regulated rail fares fall over time to come closer to the European average and with any increases linked to CPI rather than RPI.</p> <p>We recognise the need to balance fare reductions with the need to invest in a modern public transport network, with reliable services for everyday travel that are not overcrowded and that provide good value for money. Improving journey times and tackling crowding are both important elements of this.</p> <p>Flexible working for passengers can make a major contribution to managing rail capacity. It is widely noted that school holidays have a major positive impact on peak time commuting because they change the pattern of travel by parents and carers. We agree with the statement that many employees have limited ability to alter their travel patterns while noting that the number of part-time workers, self-employed workers and freelance / consultancy / sole trader roles is increasing as a significant share of the workforce. The Mayor has considerable influence on employers in the capital as well as direct influence over organisations in the GLA family. It would be a useful contribution for the Mayor to use that influence to encourage more work flexibility across a wider range of employers.</p> <p>The rail network is important for moving goods as well as people. We</p>

	<p>echo the response from our colleagues at Freight on Rail who are concerned that the MTS does not sufficiently recognise the huge economic, safety and environmental benefits of rail freight. We support the proposal to lobby the DfT for more rail freight capacity to allow more rail freight to go directly from Felixstowe to the West Midlands and the North via Leicester. We also recognise that much road freight is heading to London as its destination, and that planning to make best use of rail freight will be important to delivering the MTS goals of reduced road traffic and a better environment for Londoners.</p>
<p><i>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 let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>River services are not only important for the tourism and leisure economy but also have great potential to be expanded as an everyday travel option, not least by improving integration with the Oystercard system and by joining up with other provision in particular bus routes, bike hire and cycling routes.</p> <p>We support better integration with wider South East transport, for example developing joint rail and bus boards with representatives from surrounding transport authorities as well as operators and user groups.</p>
<p><i>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 let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>London's housing crisis is well known: using land to house cars rather than people is woefully inefficient, and fosters greater car dependency, reinforcing social and economic exclusion for people without access to a car.</p> <p>We support policies requiring new residential developments to be 'car-free', delivered by a combination of legally binding planning conditions, through property lease rules and/or exclusion from residents' parking permit schemes. This model is recognised in the 2016 London Plan and could be rolled out to all the boroughs.</p> <p>Concentrating new residential development close to public transport, including on TfL and GLA owned land, has the opportunity to deliver more affordable housing, and also reduces car dependency. In areas with a low PTAL, the emphasis of planning policy should be to secure developer contributions for enhanced public transport, rather than simply relaxing parking controls.</p> <p>Through coordination with the London Plan, planning for new employment centres and destinations event venues and retail areas can require a move away from car-based travel, for example by planning to include new bus or rail interchanges rather than large-scale parking provision.</p> <p>There is also the opportunity to work with large employers and key destinations to incentivise modal shift, for example introducing workplace parking levies, and designing integrated cycling and bus access. A consistent policy of including local or regional public transport free with event tickets - similar to the German 'Kombi Ticket' - would have wide benefits. London's successful 'Get ahead of the Games' initiative from 2012 showed how additional road congestion from events</p>

	<p>can be managed and this approach could be extended to more regular events.</p> <p>TfL and boroughs are well-placed to work with employers, schools and other destinations to support better travel planning and information to encourage smarter travel choices, in particular targeting single occupancy car use.</p>
<p>19). <i>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).</i></p> <p><i>To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth? Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.</i></p>	<p>There is a considerable body of evidence, not least from the impact of the Local Sustainable Transport Fund as well as TfL's own research, showing the positive impact good quality public transport and local transport has on connecting people to jobs, regenerating communities and facilitating good growth.</p> <p>We support enhancing and expanding the public transport network with new rail & light rail infrastructure, new cycling and walking routes, improved bus services and rail freight interchanges; we support using TfL land to provide these new links as well as being a sensible way to provide land for new homes located close to transport hubs.</p> <p>We can also see the potential for decking over existing roads to tackle pollution and provide space for new homes and jobs, provided that this is part of a comprehensive strategy to cut overall road traffic and encourage sustainable modes instead.</p> <p>We have consistently objected to plans for major new roads and new road-based river crossings which will be contrary to the positive moves to cut traffic and improve London's environment. While we are glad to see plans for additional crossings at Belvedere and Gallions have been dropped from current programmes, we are very concerned that plans for the Silvertown Tunnel are still being taken forward.</p> <p>The risk that additional traffic will be stimulated is real and has been seen on existing new road schemes, such as the widening of the M25 and the increased capacity at the Dartford Crossing. DfT post-opening evaluation reports produced on major road schemes demonstrate that traffic levels on both the new and the existing road network grew once "bypass" routes had opened. The risk can only be avoided by dropping plans for expensive and damaging new road plans, including the proposed Silvertown Tunnel, and investing instead in sustainable alternatives, such as the dedicated walking/cycling bridge proposed to connect Rotherhithe to Canary Wharf, or new Overground connection to Barking Riverside and across to Abbey Wood.</p> <p>There is however potential for a new approach to investing in redesign of existing road infrastructure, for example removing gyratories, improving the quantity and quality of public realm, with provision for cycling and bus routes, as part of a comprehensive traffic reduction approach.</p>
<p>20). <i>Policy 20 and proposal 96 set out the Mayor's proposed position on the expansion of Heathrow Airport (see pages 248 to 249).</i></p> <p><i>To what extent do you agree or disagree with this position? Is there anything else that the Mayor should consider when finalising his position?</i></p>	<p>We support continued opposition to Heathrow expansion and believe this should be absolute not conditional. We are unconvinced that any meaningful mitigation of Heathrow expansion is possible given the inevitable CO2 and noise impacts.</p> <p>DfT forecasts show aviation emissions exceeding the CCC planning assumption in both 2030 and 2050. Surface transport is also a huge issue. All of the London airports, including City Airport, have less than 50% of passengers arriving by public transport.</p> <p>There is a major funding gap in what is needed to deliver sustainable public transport to an expanded Heathrow. Instead of expanding Heathrow, more attention should be given to improving public transport connections for existing customers, disincentivising car travel to airports and improving the interchanges for intercity and international rail for both passengers and freight.</p>

<p>21). <i>Policy 21 and proposals 97 to 101 set out the Mayor's proposed approach to responding to changing technology, including new transport services, such as connected and autonomous vehicles (see pages 256 to 262).</i></p> <p><i>To what extent do you agree or disagree with this proposed approach?</i></p> <p><i>Is there anything else that the Mayor should consider when finalising his approach?</i></p>	<p>We see great potential and also some risks from the development of technology. We see new technology best used as a means to deliver the aims of the smarter travel hierarchy: reducing the need to travel, reducing the impact of travel, and making it easier to use sustainable modes.</p> <p>Technology offers a range of solutions to congestion: real time information and smartcards make sustainable modes more accessible and attractive, while big data can assist in traffic management and transport planning.</p> <p>The risk is that we will simply see new technology result in congested streets. Our guiding principle is that we need fewer cars not simply newer cars.</p> <p>We are concerned that an over focus on new vehicle types and gadgets may distract from the more important applications of data to improve transport planning by operators and providers and transport choices for individual users.</p> <p>As technology driven options become more of a feature of London's transport offer, we want to see TfL take a lead in ensuring such services are accessible and make a positive contribution as part of London's transport family.</p> <p>Mobility as a service packages can be liberating for people excluded from conventional public transport, however it is important that provision is designed to complement existing public transport, filling gaps in services at specific locations or times of day, rather than adding new traffic in already busy and well-connected areas.</p> <p>It is also important that people who do not have smartphones or feel unsafe using phones in public, particularly older people, are not excluded for example by having phone in as well as app-based options for Demand Responsive Transport.</p>
<p>22). <i>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).</i></p> <p><i>To what extent do you agree or disagree with this proposed approach?</i></p> <p><i>Is there anything else that the Mayor should consider when finalising his approach?</i></p>	<p>It is vital that London's transport has adequate, fair, robust and sustainable funding.</p> <p>We are concerned that the combined effect of the loss of DfT revenue support to TfL, combined with the future ring-fencing of VED (including VED paid by Londoners and by motorists from across the UK who use London's roads) or England's strategic road network outside London, will result in a dangerous double hit on the sustainability of London's transport funding. This will mean that not only do London's motorists get no local benefit from the VED they pay, but that all Londoners will effectively be subsidising the repair of London's roads through fares and other local payments. We strongly support calls for some of Londoners' VED to be retained for road repairs, renewals and safety improvements.</p> <p>Introducing some form of road user pricing so that the external costs from road traffic are appropriately charged would redress this unfairness. Any future new taxation streams for London (for example a tourism-related tax) should make a fair contribution to public transport and the public realm.</p> <p>We advocate having a joined up strategy with the London Plan and boroughs on S106 and CIL contributions, recognising that affordable public transport is as important as affordable housing for a sustainable city, and ensuring that the uplift in value that developments gain from having good public transport links is appropriately captured.</p> <p>Where boroughs are supporting delivery of the MTS, for example by introducing Workplace Parking Levies, the revenue could be held at</p>

	borough level but ring-fenced for contributions to the healthy streets approach.
<p>23). <i>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).</i></p> <p><i>To what extent do you agree or disagree with this proposed approach?</i></p> <p><i>Is there anything else that the Mayor should consider when finalising his approach?</i></p>	<p>We welcome an outcome-based approach to monitor delivery of the MTS, with the ultimate outcome being a greener, more liveable, traffic reduced city.</p> <p>We favour involving user groups in the design and monitoring of performance indicators.</p> <p>There is a risk that long term targets can lead to delaying action in the short-term. Therefore we also favour having milestones for each policy target to ensure that progress starts early and is maintained throughout the delivery of the strategy, addressing the area 'under the curve'.</p>
<p>24). <i>Are there any other comments you would like to make on the draft Mayor's Transport Strategy?</i></p>	<p>The vision is welcome and needs to be underpinned by appropriate actions and funding.</p> <p>We propose a combination of traffic demand management through introducing measures such as workplace parking levies, road user pricing, smart freight solutions, and using land use planning to move away from car dependency.</p> <p>We oppose the expensive fallacy that we can build our way out of congestion with new roads, and call for an immediate end to plans for new road-based river crossings in east London: instead, we advocate investing the substantial sums currently allocated for new roads, together with a fair share of London's VED income, in better walking, cycling and public transport options.</p> <p>We believe such a package of measures would have wider social, health, environmental and economic benefits for London as a whole, and help make our capital a model of liveable 21st century cities.</p>
<p>25). <i>We have commissioned an Integrated Impact Assessment (IIA) on the draft Mayor's Transport Strategy. We would welcome your views on the impacts that have been identified and whether you feel anything is missing?</i></p>	<p>It is important that the MTS contributes positively to meeting carbon emission and other mandatory environmental targets, and for the IAA to provide a sufficiently robust appraisal framework, including challenging the assumption that investment in greater road connectivity is the best or only way to deliver social inclusion or economic growth.</p> <p>As new technology becomes ever more central to accessing transport services, it is important that the needs of older people, people with disabilities and others who may not have easy access to smartphones yet who are highly dependent on accessible public transport, to be taken into account.</p>

29 September 2017

Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's 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.

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