

**Mayor's Transport Strategy – Statement of Intent  
London First Response  
13/07/09**

**INTRODUCTION**

1. London First welcomes the opportunity to respond to the Mayor's Transport Strategy – Statement of Intent. We look forward to working with the Mayor, his advisers and officers on emerging policy. We will also be responding to the Mayor's housing and economic development strategies and the London Plan.
2. London First is a business membership group whose aim is to make London the best city in the world in which to do business. We do this by mobilising the experience, expertise and enthusiasm of the private sector to develop practical solutions to the challenges London faces and to lobby government for the investment that London needs in its infrastructure. London First delivers its activities with the support of around 250 of the capital's major businesses in key sectors such as finance, professional services, property, creative industries, hospitality and retail. Our members represent around a quarter of London's GDP.
3. The capital's economic growth is heavily dependent on the ability fluidly to move people and goods within London and to and from other regions of the UK and the rest of the world. London First therefore strongly supports the Mayor's commitment to improve transport to support London's continued economic success in the face of severe and growing global competition for markets and investment.
4. In particular, London First welcomes:
  - the clear and comprehensive statement of the major transport related challenges facing the capital, transport users, the economy and the environment;
  - the Mayor's commitment to deliver significant increases in public transport capacity with the building of Crossrail and the planned modernisation of the Tube;
  - recognition of the need to improve conditions on the road network;
  - the emphasis placed on the integration of transport and land use planning;
  - the Mayor's plans to complete the upgrades of overground rail system;
  - recognition of the need to work more closely with local authorities to provide consistent and integrated public transport and road networks; and
  - the Mayor's intention to develop measures to manage demand as part of his overall approach to improving London's transport provision.
5. The final Strategy will run through to 2031 and so needs to look well beyond the current TfL ten year plan which covers both the delivery of Crossrail and the bulk of the Tube modernisation work. Investment decisions in the later period need to be based on objective predictions of likely transport demand and be consistent with the other Mayoral strategies. London needs a comprehensive transport vision through to 2031 with milestones that will mark the delivery of a transport system that will meet London's needs.

6. Following extensive dialogue with London First members, we believe that the final strategy must:

- set out a prioritised list of projects, based on rigorous cost benefit assessments to ensure maximum value is gained from limited transport investment. These should include projects which relieve Tube overcrowding and improve cross river connectivity, such as Crossrail 2 and new east London river crossings, respectively;
- give greater weight to tackling road congestion;
- tackle London's air transport needs;
- place more emphasis on integrating transport provision and improving information for transport and road users;
- develop innovative measures to manage demand; and
- take further action to address the problems faced by delivery and servicing operators.

## **EXPLANATION OF RECOMMENDATIONS**

### **1. Prioritised list of projects**

The *Eddington Transport Study* (DfT, December 2006) showed definitively that poor transport is a major barrier to increasing economic growth. Central London is at the heart of the UK's economy. Agglomeration benefits and national and international connectivity are key to central London's competitiveness and productivity. It is essential that its growth is supported through continued improvements to existing public transport networks - particularly capacity upgrades to address overcrowding and cater for growth - and to the road system. Equally, where improvements to transport provisions associated with any sufficiently dense development elsewhere in London can provide comparable economic benefits they too should be promoted.

Given that funds available for transport investment in London are already overstretched in the short-medium term, it is essential that any new investment is targeted to the areas which will allow London to reach its maximum economic potential. We believe, therefore, that the Strategy should be based on rigorous cost benefit assessments to ensure that the most economically effective schemes are taken forward first.

However the Strategy needs to do more than just set out investment criteria. The Bakerloo line upgrade in 2022 is the only major capital investment project included in the Statement, after Crossrail opens in 2017/8 and the bulk of the planned Tube modernisation is completed in 2018. Given the lead times associated with capital investment projects (as has been demonstrated by Crossrail) the final Strategy should include a list of new projects that will be delivered through to 2031. To avoid interruptions to network development after this period, projects which require planning before 2031 should also be included, where practicable.

This clarity will underpin funding discussions with central Government during future spending reviews and steer priorities in the event of any funding shortfalls. The Strategy also needs to provide sufficient detail to enable the development and investment sectors to plan and provide clear, specific guidance in the event of a public examination.

A number of projects identified by London First members as important are listed in our response to Question 6a.

### **2. Attaching greater weight to tackling road congestion**

60% of journeys in London are made by road. Buses, taxis, and servicing and delivery vehicles are all dependent on the road network, as well as the private car. Three million tonnes of freight travel by road in London each week. The road network is critical to business.

Transport for London (TfL) states that the capital experiences 40% of England's congestion. The network is very unreliable and critically lacks resilience on many routes. The congestion charge continues to deter 70,000 vehicles a day from entering central London, but congestion has returned to pre-charging levels. More widely, traffic growth over the last 10 years has been negligible but average speeds on major roads have fallen by 8%.

London is more congested than its competitor cities and this disadvantages existing businesses and has the potential to deter new investment.

While the actions to tackle congestion listed in the Statement are welcome, the weight attached to this issue needs to be increased considering that congestion will, according to TfL's own figures, cost the economy over £40 billion during the life of this transport strategy.

The following complementary actions are required:

- Holistic planning of all major routes, versus agreed and challenging targets
- Improved rapid response facilities on all strategic routes
- Better micro management and co-ordination of road and major works
- Greater investment to tackle congestion 'hot-spots'

### **3. Delivery of new airport capacity in London**

London's competitiveness and attractiveness to international investment as a world city depends on easy and efficient connections to a wide range of business centres. This is recognised in *Rising to the Challenge*, the Mayor's proposals for the economic development strategy, and the transport strategy must highlight the importance of improving international connectivity.

The Strategy will require policy clarity if it is to support the development of excellent international connections needed to underpin London's growth. At present, there is a disconnect between the analysis of London's need for enhanced international connections, particularly the strains on Heathrow, and the opposition to a third runway.

Work to evaluate long-term potential solutions to London's air transport needs should proceed in parallel with the medium term expansion of Heathrow; and does not obviate the need to tackle the short term drivers of poor service quality at Heathrow that continue to undermine London's competitiveness and attractiveness as a major world city.

In addition to the services offered by the larger airports and carriers, high quality and readily accessible facilities are required for business aviation users. We consider that a heliport closer to the City, Canary Wharf and the London Thames Gateway is required, and that better use of existing spare runway capacity at London's local airports would be desirable.

### **4. Integrating transport and improving information for transport and road users**

Increasingly, feedback from London First members suggests that performance of individual modes has improved considerably but that better integration between modes is necessary. Fully integrating TfL and non-TfL services - within and connecting to London - to provide a seamless and high quality 'end to end' journey experience was rated as a top priority in a survey of 107 London First members in October 2008.

Additionally, we believe that effective capacity can be increased, at modest cost, by creating an holistic transport provision more effectively communicated to users. Improvements should incorporate all modes and services – including those not provided by TfL - and should include:

- aligned multi-modal timetables (e.g. bus and river services);
- further interchanges improvements (e.g. rail and cycle hire);
- unified ticketing system and fares structure (e.g. aiming for 'one ticket commutes'); and
- mobile, real time information (e.g. via mobile phones and in-vehicle GPS devices)

## **5. Development of innovative measures to manage demand**

London First agrees that a strategy steering the development of an effective transport system in a large city, constrained by funding and space, has to be multi-faceted in its approach. We support the inclusion of policies which seek to examine land use assumptions, provide further transport capacity and manage demand.

We welcome the wider use of demand management with the caveat that it must support, not lessen, London's competitiveness.

We welcome the proposal to explore wider road user charging schemes which do not unduly restrict business and believe the Strategy should provide the framework for other, innovative, demand management approaches including:

- co-coordinating connecting non-TfL services to flatten demand peaks (e.g. equi-spacing train arrivals);
- actively seeking ways to consolidate the large numbers of light goods vehicles; and
- progressing out-of-hours deliveries in non-residential areas.

## **6. Further action to address issues facing delivery and servicing operators**

Delivery and servicing vehicles account for 15-20% of all traffic in London. In the charging zone, they complete over four times more mileage than buses and coaches combined. These operations and many of these journeys are essential to London. Increasing customer demand, growing congestion, the reduced availability of official and safe unloading kerbside facilities and complex and contradictory regulation have unduly contributed to difficult operational conditions.

While we welcome the actions distributed throughout the Strategy, we believe that these need complementing to reverse the decline in conditions witnessed over the last decade.

Actions required include working with boroughs to reduce the worst unloading hot-spots and the rationalisation of the restrictions which influence operations, such as the London Lorry Control Scheme and the delivery windows specified in planning consents.

## **ANSWERS TO QUESTIONS LISTED**

### **Question 1**

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

#### **End to end journeys**

Fully integrating TfL and non-TfL services - within and connecting to London - to provide a seamless and high quality 'end to end' journey experience was rated as a top priority in a survey of 107 London First members in October 2008.

We believe that as effective capacity can be increased, often at relatively modest cost, there is a strong case for including an explicit objective in the Strategy to provide a framework for improvements including:

- Aligned multi-modal timetables (e.g. bus and river services)
- Further interchanges improvements (e.g. rail and cycle hire)
- Unified ticketing system and fares structure (e.g. aiming for 'one ticket commutes')
- Mobile, real time information (e.g. via mobile phones and in vehicle GPS devices)

#### **Disruption management**

An undesirable by-product of the high rate of renewal and upgrade to the transport network is the increased level of disruption experienced. Minimising the impact of essential works to business (including some critical parts of evening and weekend economies such as major leisure venues) is important.

This is a significant challenge in the short and medium terms and the Strategy should define this challenge and propose high-level actions to satisfactorily address it.

#### **Self funding**

Growing transport demand combined with greater pressures on conventional funding channels, will necessitate that transport increasingly funds itself, where viable. For example, without unduly restricting business, new road user charging schemes designed to reduce congestion on the worse roads could raise funds for reinvestment in public transport. This would be an important step towards a financially sustainable transport provision and, as such, should be included in the Strategy as an important challenge.

#### **Value for money**

Bus services have been one of London's major transport success stories, but one which has led to a significant increase in subsidies.

We would welcome a wholesale review to examine how these benefits can be maintained at better value, by increasing average occupancy through better matching supply to demand.

This is likely to necessitate adopting a new philosophy which recognizes that some journeys may need to be made by multiple modes or multiple buses, supported by 'through' ticketing.

## **Question 2**

*Referring to chapter three, the MTS Statement of Intent proposes adopting a spatial approach similar to that set out by the DfT's Delivering a Sustainable Transport System (see Figure 1). Does anything need to be added or improved to ensure this approach fully complements the national strategy while meeting London's needs?*

In addition to the services offered by the larger airports and carriers, high quality and readily accessible facilities are required for business aviation users. We consider that a heliport closer to the City, Canary Wharf and the London Thames Gateway is required.

Taxis and minicabs are an important part of the transport system in London. Taxi ranks (mentioned in paragraph 80 but not Figure 1) should feature as an interchange.

River services and piers should be included in the Strategy and hence the overall transport provision.

If an electric vehicle hire scheme is planned, these facilities should also be included.

## **Question 3**

*Referring to chapter three, the MTS will be implemented in partnership with boroughs and other stakeholders through London Regional Transport Plans and Local Implementation Plans (LIPs). With this in mind, how should the MTS ensure consistent outcomes and progress across London?*

It is critical to predict objectively likely transport demand up to the end of this period, consistent with the other mayoral strategies, and to use this analysis to develop a comprehensive vision. In addition to providing this framework, the Strategy should aid the focusing of finite resources of different organisations on to key projects. Due to this, and the long lead times associated with capital investment projects, the Strategy must include a tenable list of projects. Where possible, these should cover the strategic period up to 2031.

Funding should be set, and the operational service levels achieved should be reviewed, against a series of key performance indicators for each major deliverable. These should include the road network and modes and services not directly provided by TfL but which are important to London's transport system.

In the interests of consistency, we do not support the boroughs being given any further traffic or road management powers on the TfL Road Network.

## **Question 4**

*Referring to chapter four, what is the right balance between the three broad policy approaches: changing land use assumptions, managing demand and providing further transport capacity? What role can new technologies play in tackling London's transport challenges?*

We agree that a strategy steering the development of an effective transport system in a large city, constrained by funding and space, has to be multi-faceted in its approach. We support the inclusion of policies which seek to examine land use assumptions, manage demand and provide further transport capacity.

London First particularly welcomes the Mayor's commitment to increasing capacity by building Crossrail and delivering the Tube modernisation originally promised by the PPP.

While the actions to tackle congestion detailed are welcome, we believe that greater weight needs to be attached to maximising the effective capacity of the road network by tackling congestion. The road network is vital to most business sectors, is very unreliable and critically lacks resilience due to high and rising congestion on many routes.

In particular, in a demand-managed area such as within a charging zone, congestion growth can be restrained or reduced with a package of suitable measures including - when necessary - carefully targeted increases in charge levels.

We welcome the wider use of demand management with the caveat that resulting travel patterns and volumes support and do not unduly lessen London's competitiveness. We specifically welcome the proposal to explore wider road user charging and believe the Strategy should provide the framework for other, innovative, demand management approaches including:

- demand managing connecting non-TfL services (e.g. equi-spacing train arrivals)
- actively seeking ways to consolidate the large numbers of light goods vehicles
- progressing out-of-hours deliveries in non-residential areas

#### **Question 4a**

*For land use assumptions, your views would be welcomed on the following:*

- *What transport interventions are required to support economic development focused on 'strategic Outer London development centres'?*
- *What transport interventions are required to support more growth in Outer London generally?*
- *If there were to be a greater focus on economic development in Outer London, what additional transport interventions would still be required to maintain central London's economic vitality?*

Central London is at the heart of the UK's economy. Agglomeration benefits and national and international connectivity are key to central London's competitiveness and productivity. It is essential that its growth is supported through continued improvements to existing public transport networks - particularly capacity upgrades to address overcrowding and cater for growth - and to the road system. Additionally, maximum use must be made of existing transport capacity, including promoting development in accessible areas which maximises density.

Equally, where improvements to transport provisions associated with any sufficiently dense outer London development centre can provide comparable economic benefits they should be promoted with equal priority.

Given that funds available for transport investment in London are already overstretched in the short-medium term, it is absolutely essential to target new investment in transport to allow London to reach its maximum economic potential. In practice high cost capital works will only be viable in central London and a small number of centres (where density supports private sector contributions via s106 agreements), during the period covered by the 10 year funding settlement.

London First therefore believes that, in the short-medium term, the Strategy should promote three principal approaches to improving transport policy in outer London. First, delivering a better managed road network; second, making the existing network infrastructure work more efficiently; and third, improving public transport modes which are flexible and have lower capital costs – such as low cost bus routes (where procured capacity closely matches demand), walking and cycling. In the longer term, this approach in outer London should be supplemented by investment in key infrastructure, for example with extensions to the Croydon Tramlink.

We support policy that integrates transport and development. This should include maximising development opportunities (and density) in areas of existing accessibility. This will be particularly important in the short to medium term in light of funding constraints.

#### **Question 4b**

*For managing demand, your views would be welcomed on the following:*

- *What is the role of pricing (e.g. targeted local road pricing or London-wide road pricing) to help manage demand?*
- *Would your view of pricing change if there was more economic development in Outer London where car usage is higher and public transport less pervasive?*

As a complement to measures which increase effective road capacity, London First supports in principle the increased use of road user charging, including tolling. Schemes must be designed to avoid undue impacts on business and should be targeted at areas of high congestion, primarily to improve the reliability of the network. We also note that meeting carbon and air quality targets in the short to medium term will be impossible without significantly reducing congestion.

As typically 15-20% of local traffic is undertaking delivery and servicing, demand management of these vehicles would have a significant effect on local congestion and air quality. Where congestion levels are insufficiently high to suggest that the public would support road pricing, retail and waste consolidation centres are an effective solution. Such centres are proven to reduce local delivery traffic and emissions by 60-70% and would be suitable for introduction in central London and some of the outer London town centres being considered.

#### **Question 4c**

*For providing further transport capacity and connectivity your views would be welcomed on the following:*

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

Agglomeration benefits and connectivity are vital to central London's competitiveness and productivity. It is essential that its growth is supported through continued improvements to existing public transport networks – particularly capacity upgrades to address overcrowding and cater for growth - and to the road system.

Where improvements to transport provisions associated with any sufficiently dense outer London development centre can provide comparable economic benefits they should be promoted with equal priority.

Opportunities should be actively identified and promoted where major developments can deliver substantial operational and environmental improvements to key transport interchanges such as at Victoria. This will be particularly important in the short to medium term where TfL's funds for transport projects are likely to be limited.

#### **Question 4d**

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

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

Fully integrating TfL and non-TfL services - within and connecting to London - to provide a seamless and high quality 'end to end' journey experience was rated as a top priority by London First members in a survey in October 2008. New technology could be employed to achieve this and increase the effective capacity of the transport network, often at relatively modest cost by unifying the ticketing system providing mobile, real time information (e.g. via mobile phones and in vehicle GPS devices)

Implementing electric vehicles on a supplementary, and not additional, basis is welcome as part of a package of measures to reduce emissions that contribute to climate change and poor air quality.

#### **Question 5**

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

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

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

Central London is at the heart of the UK's economy. Agglomeration benefits and national and international connectivity are key to central London's competitiveness and productivity. It is essential that its growth is supported through continued improvements to existing public transport networks.

Equally, where improvements to transport provisions associated with any sufficiently dense outer London development can provide comparable economic benefits, they should be promoted with equal priority.

We therefore support neither option but a policy which targets new investment in transport to allow London to reach its maximum economic potential.

Referring to chapter four:

### Question 6a

*a) To support economic development and population growth a number of broad policies have been outlined to improve London's national and international links, capacity and efficiency London-wide, radial links into central London and 'strategic Outer London development centres' and orbital connectivity. What are the policy priorities? Are there any other policies that should be included in the MTS under the economy theme?*

London First believes that policy priorities should be:

- Completing Crossrail and planned Tube modernisation
- Tackling road congestion, principally on major routes feeding and joining business centres
- Improving integration and information pan-London
- Completing the overground rail upgrades, described in *Rail 2025*
- Improving the aviation provision
- Identifying strategically critical projects, including Crossrail 2 and new river crossings in east London which support the views expressed in our answer to Q5, above
- More innovative demand management, including road user charging
- Improving conditions for delivery and servicing operators

Where final solutions are not affordable within the 10 year funding settlement, adequate short term improvements should be sort, for example with the procurement of a vehicle ferry at Gallions Reach.

### Question 6b

*To enhance quality of life a number of broad policies have been outlined to improve journey experience, the built and natural environment, air quality, reduce noise impacts and improve health. What are the policy priorities? Are there any other policies that should be included in the MTS under the quality of life theme?*

London First believes that policy priorities should be:

- Expanding the capacity and quality of the Tube network
- Tackling road congestion to improve air quality
- Improving strategic management and operation of the road network
- Improved information
- Enhancing quality of urban realm
- Increased flexibility of ticketing

### Question 6c

*To improve safety and security a number of broad policies have been outlined to reduce crime, the fear of crime and antisocial behaviour, and to improve road safety and public transport safety. What are the policy priorities? Are there any other policies that should be included in the MTS under the safety and security theme?*

London First believes that policy priorities should be:

- Implementing an integrated local transport policing provision by closer coordination of Met Police, BTP and City of London resources
- Ensure provision of safe and secure transport at night

**Question 6d**

*To improve transport opportunities for all a number of broad policies have been outlined to increase accessibility, support regeneration and enhance access to opportunities and services. What are the policy priorities? Are there any other policies that should be included in the MTS under the transport opportunities for all themes?*

London First believes that policy priorities should be:

- Improving access to jobs, healthcare, education, retail and leisure services
- Improving availability of information available

**Question 6e**

*To tackle climate change a number of broad policies have been outlined. What are the policy priorities? Are there any other policies that should be included in the MTS under the climate change theme?*

London First believes that policy priorities should be:

- Facilitating use of more sustainable modes via investment
- Tackling road congestion to reduce emissions
- Promoting wider use of road charging to reduce traffic and congestion
- Improving efficiency of freight movements via the use of consolidation centres
- Implementing electric vehicles on a supplementary and not additional basis