

London Assembly Transport Committee

Response to draft London Plan

We welcome the Mayor's draft London Plan and this opportunity to submit our views. The draft plan contains a series of measures that will help to enhance London's transport network by delivering our shared ambitions for achieving a mode shift to sustainable transport and delivering healthy streets across London.

We support the objective, as set out in Policy T1, for 80 per cent of all trips made in London to be made by walking, cycling or public transport by 2041. We have already commented in response to the Mayor's draft Transport Strategy that interim targets should be set before 2041 and hope this proposal will be reflected in the London Plan.

The London Plan is a vital tool in the effort to transform London's street environments. We support the Mayor's Healthy Street agenda, as set out in Policy T2. Transport for London has developed a Healthy Streets check for designers, which should be applied to new developments to ensure they improve opportunities for Londoners to use active travel modes.

In this submission we have highlighted areas where we believe changes to the draft London Plan to further these aims.

Policy T3 Transport capacity, connectivity and safeguarding

Current wording:

D. In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line.

Suggested changes:

- Active travel and bus services should also be given priority alongside major rail schemes and river crossings.

Suggested wording:

D. In Development Plans and development decisions, priority should be given to delivering upgrades to Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river

crossings, an eastwards extension of the Elizabeth Line, local walking and cycling routes and outside the CAZ, bus network enhancement.^{1,2}

Evidence in support of changes:

The Mayor has set several targets that are not adequately reflected in this policy. These targets cannot be met without enhancements to walking and cycling routes:

- For 80 per cent of journeys to be undertaken by walking, cycling and public transport.
- For all Londoners to undertake at least 20 minutes of active travel per day.
- For 70 per cent of Londoners to live within 400 metres of a high quality, safe cycle route.

The mode share of walking and cycling has not increased significantly in recent years:³

- Between 2010 and 2016, the mode share of cycling has increased slightly from 1.7 per cent to 2.2 per cent.
- Between 2010 and 2016, the mode share of walking has decreased slightly from 20.9 per cent to 20.8 per cent.

Following a decade of strong growth, bus passenger numbers are now in decline. Between 2014-15 and 2016-17, the number of passenger journeys made on buses fell by six per cent.⁴ The causes for this include the rise in traffic congestion, which contributed to a 20 per cent increase in excess wait times for buses in the three years to 2015-16.⁵

The Transport Committee has called for an increase in bus capacity in outer London. Much of London's growth will take place in outer boroughs, which already tend to have poorer transport connectivity based on Public Transport Accessibility Level (PTAL) scores.⁶

Outer London should offer the most potential for mode shift from cars to public transport, as car use is significantly higher there. On average, Outer London residents make twice as many car journeys than inner London residents, and significantly fewer bus journeys.⁷

¹ Caroline Pidgeon AM and Caroline Russell AM propose that road-based river crossings should not be given priority in Development Plans and development decisions. This would apply specifically to the Mayor's proposals for a Silvertown tunnel. Cycling and pedestrian crossings should remain as priority schemes, in order to encourage active travel options without inducing additional motorised vehicle traffic.

² David Kurten AM of UKIP believes motor vehicle routes should also be prioritised in Development Plans and development decisions. The objective of this is to ensure the transport network is inclusive to people who have no alternative than to use motorised transport such as disabled people, and those who use car clubs.

³ <http://content.tfl.gov.uk/travel-in-london-report-10.pdf>. Based on journey stages. Walking journeys are counted if the entire journey is walked.

⁴ <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports>

⁵ <http://content.tfl.gov.uk/q4-2015-16-quarterly-report.pdf>

⁶ <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

⁷ <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports>

Policy T5 Cycling

Current wording:

This policy contains no reference to a target modal share for cycling.

Suggested changes:

- A target modal share for cycling should be added.

Suggested wording:

The Mayor will work with all relevant partners to bring about a significant increase in cycling in London, so that it accounts for at least 7 per cent of modal share by 2041.

Evidence in support of changes:

The Mayor has set a target in his Transport Strategy to increase the combined modal share of cycling, walking and public transport to 80 per cent by 2041.

The Transport Committee is currently investigating cycling infrastructure, including cycle parking. The report will assess the Mayor's progress in delivering new infrastructure and recommend steps that need to be taken to increase cycling modal share. The report will be published in Spring 2018. The Committee may have further suggested changes to this policy at that time.

Stakeholders engaging with the Committee during this investigation have advised that specific targets for cycling are required. Specific cycling targets are necessary to help guide investment decisions, and to allow the Mayor to be held to account. It is also important to ensure that TfL prioritises cycling, rather than relying on public transport to meet the 80 per cent target.

Policy T6.1 Residential parking

Current wording:

D. Outside of the CAZ, and to cater for infrequent trips, car club spaces may be considered appropriate in lieu of private parking.

Suggested changes:

- This policy needs firmer requirements to provide car club spaces to ensure car clubs becomes a viable alternative to car ownership.

Suggested wording:

D. Outside of the CAZ, and to cater for infrequent trips, new residential developments must include dedicated car club parking spaces, which are available for use by any car club.

Evidence in support of changes:

Car clubs offer the potential to decrease traffic congestion, by reducing private car ownership, and therefore reducing the number of unnecessary journeys made by car. A survey of car club members by Carplus has produced data to show reduced car ownership and car mileage among long-term members (over six months' membership):⁸

- 26 per cent of respondents said overall car mileage had gone down in their household after joining a car club, while 19 per cent said it had gone up.
- 49 per cent owned at least one car before joining a car club, falling to just 23 per cent after joining.
- 11 per cent had sold or disposed of a car in the previous year. One in four stated that car club membership was the main reason or a major factor in their decision to sell or dispose of their car.
- 34 per cent said they would have bought a private car if they had not joined a car club.

Privately owned cars are parked for 97 per cent of the time.⁹ This requires substantial parking provision. If car club vehicles are in more frequent use some existing parking space could be freed up, particularly if private car ownership declines.

The Mayor and Transport for London have a car club strategy, published in 2015. This set a target for a five-fold increase in car club membership in London by 2025, to one million members.

This level of membership will not be achieved unless the availability of car club vehicles is increased significantly, especially in Outer London. In 2015, there were 2,480 car club parking bays in London. This is an average of 75 per borough, although there were wide discrepancies. While there were over 200 bays in Camden and Lambeth, eight outer boroughs had fewer than 10 bays. Car clubs report difficulties in obtaining parking spaces on existing residential streets, where most spaces are reserved for use by residents to park private cars.

⁸ [Annual survey of car clubs in London](#), Car Plus, March 2017. Among members of car clubs with fixed parking spaces requiring users to make a round-trip journey.

⁹ [A Car Club Strategy for London](#), TfL, 2015

Policy T7 Freight and servicing

Current wording:

F. Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

G. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

Suggested changes:

- The policy should refer to the Mayor's target for all of London to be within a 30-minute drive of a construction consolidation site
- The policy should seek to reduce the number of personal deliveries being made within central London.

Suggested wording:

F. Development proposals should facilitate sustainable freight and servicing, including through the provision of adequate space for servicing and deliveries off-street. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments. Development proposals for construction consolidation centres should be located in such a way as to cover all of London within a 30-minute drive.

G. Developments should be designed and managed so that the overall number of personal deliveries received on the site is minimised, and so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

Evidence in support of changes:

After a period of stability, LGV traffic has increased from 3.8 to 4.2 billion kilometres per year since 2012 (11 per cent) while HGV traffic has remained stable at 1.0 billion kilometres per year.¹⁰ Vans make up around 80 per cent of commercial traffic in London, and are responsible for almost all the recent growth in freight traffic.

The growth in freight traffic is a reflection, generally, of the growth of London's population and economy. But the fact that van traffic has outstripped lorry traffic suggests other

¹⁰ [Traffic volume – kilometres](#), Department for Transport, 2016

changes are contributing to the trend, including the restrictions placed on lorries, and the increasing popularity of internet shopping.

Internet shopping has increased significantly in recent years. In October 2011, 9.4 per cent of all retail spending was online. In October 2016 this had increased to 15.2 per cent.¹¹ This changes traffic patterns as more vans are deployed, visiting more locations as they deliver packages to consumers and businesses. Traffic is also created by people returning items they have bought online.

Personal deliveries also cause an increasing amount of freight traffic. TfL has banned staff from receiving personal deliveries at work and urged other companies to do the same.

Freight consolidation has been effective at reducing delivery traffic. The Mayor is now promoting the use of consolidation centres. In his new Transport Strategy, he has set an ambition for all of London to be within a 30-minute drive of a construction consolidation centre. The London Plan should reflect this policy.

Policy T8 Aviation

Current wording:

E. All airport expansion proposals should demonstrate how public transport and other surface access networks would accommodate resulting increases in demand alongside forecast background growth; this should include credible plans by the airport for funding and delivery of the required infrastructure.

H. Airport operators should work closely with airlines, Transport for London and other transport providers and stakeholders to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access. They should also increase the proportion of journeys passengers and staff make by sustainable means such as rail, bus and cycling, and minimise the environmental impacts of airport servicing and onward freight transport.

Suggested changes:¹²

- The policy should specify that any expansion plans which lead to an increase in road traffic or severe overcrowding on public transport are unacceptable.
- The policy should set a binding target for the proportion of staff and passenger journeys made by sustainable modes.
- The policy should reiterate that any surface access measures in airport expansion proposals can only be considered in light of the opposition to Heathrow expansion if this results in noise or air quality harm.

Suggested wording:

¹¹ [Retail sales in Great Britain: October 2016](#), Office for National Statistics, November 2016; [Retail sales, October 2012](#), Office for National Statistics, November 2012

¹² Caroline Russell AM would like to clarify that she is opposed to the expansion of Heathrow Airport under any circumstances.

E. Notwithstanding the policy to oppose the expansion of Heathrow Airport if this results in any additional noise or air quality harm, all airport expansion proposals should demonstrate how public transport and other surface access networks would accommodate resulting increases in demand alongside forecast background growth; this should include credible plans by the airport for funding and delivery of the required infrastructure. All airport expansion proposals must demonstrate their delivery will not lead to an increase in road traffic or severe overcrowding on public transport.

H. Airport operators should work closely with airlines, Transport for London and other transport providers and stakeholders to ensure straightforward, seamless and integrated connectivity and to improve facilities and inclusive access. They should ensure at least half of all journeys by passengers and staff are made by sustainable means such as rail, bus and cycling, and minimise the environmental impacts of airport servicing and onward freight transport.

Evidence in support of changes:

The Airports Commission projected a rise in the number of passengers using Heathrow from 73 million per year, to 148 million per year by 2050 if a third runway is delivered. This doubling of passenger numbers, in addition to the growth in freight traffic and the airport workforce, will mean that there needs to be a corresponding increase in the capacity of the transport network. To date there is no plan from the airport or the Government to fund and deliver new transport infrastructure to meet this demand.

The transport schemes identified as being required, if a decision is made to expand Heathrow, include upgrading of the M4, M25 and other local roads, upgrading the London Underground's Piccadilly Line, Crossrail, High Speed 2 and the 'Southern Rail Access' scheme connecting Heathrow to Waterloo. It is likely that further schemes would be required to support a 'full utilisation' scenario by 2050, as set out above. This would represent a highly ambitious and costly programme of upgrades.

We understand that the Airports Commission has estimated that the cost of upgrading surface transport upgrades for an expanded Heathrow – for the 2030 scenario – is around £5.7 billion. This represents only a part of the total cost of the required upgrades, because the Commission has only cited the costs supposedly 'directly' attributable to Heathrow. The total cost of the identified upgrades is likely to be around £15-20 billion, as estimated by Transport for London.

Proposals for airport expansion need to include clear guarantees that the required transport infrastructure will be delivered. Without new infrastructure, congestion on the road network around Heathrow will increase significantly, and overcrowding on public transport services to Heathrow will become severe.