

Draft Mayor's Transport Strategy

**Statutory consultation with the public and
stakeholders**

TfL'S REPORT TO THE MAYOR ON CONSULTATION

April 2010

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1. Introduction

1.1 Overview and purpose of this Report

- 1.1.1 The Mayor of London decided to produce a new, revised Mayor's Transport Strategy (MTS), to replace the one approved in 2001. The MTS is the principal policy tool through which the Mayor and TfL exercise their responsibilities for the planning, management and development of transport in London. The development of this strategy was delegated to Transport for London (TfL), although the Mayor retained responsibility approving the consultation documents. TfL was delegated responsibility for undertaking the necessary consultation exercises and impact assessments.
- 1.1.2 The Greater London Authority Act 1999, as amended, ("the GLA Act") requires two phases of statutory consultation associated with the preparation or revision of a Mayoral Strategy. In relation to the MTS, the first phase, consultation with the Greater London Assembly and Functional Bodies, was undertaken in summer 2009. The second phase, consultation with the public and stakeholders on the proposed text of a new strategy ("the Public Draft MTS"), commenced in October 2009 and closed in January 2010. The purpose of this report is to inform the Mayor about the second phase of consultation. A brief summary of the first phase of consultation, placing it in the wider context of the development of the Mayor's vision for London, is set out in Section 1.5 below.
- 1.1.3 This is a report of the public and stakeholder consultation exercise into the proposed revisions to the MTS as set out in the Public Draft, which was carried out between 12 October 2009 and 12 January 2010. Chapter 2 outlines the consultation process itself and refers to Annex A which contains the Accent report. "Accent" are the contractors who, on behalf of TfL, analysed the 5,578 responses received from the public, businesses and other organisations. Annex B summarises the 151 stakeholder responses received, which were analysed by TfL. Chapter 3 sets out TfL's response to these representations and the topics raised. The issues are summarised and then followed by TfL's response and recommendations. The Mayor is advised, when considering TfL's summaries, responses and recommendations, to have regard to the consultation responses themselves all of which have been copied to him.
- 1.1.4 The remainder of this chapter outlines the legal framework for the Mayor's Transport Strategy; describes how it has been developed alongside the London Plan and the Economic Development Strategy; and describes the Strategy in the context of the challenges facing London and the Mayor's vision for the Capital.

1.2 The Legislative Framework for the Mayor's Transport Strategy

1.2.1 The GLA Act provides the legislative framework for the MTS. It sets out the general transport duties of the Mayor, and requires that he publishes a Strategy containing his policies and proposals for discharging his general transport duty: to promote and encourage safe, integrated, efficient and economic transport facilities and services to, from and within Greater London. The Act also specifies that the MTS must also contain the Mayor's proposals for providing transport that is accessible to persons with mobility problems, together with a timetable for their implementation. (This was addressed in the Accessibility Plan contained in the Public Draft MTS.)

1.2.2 It is also a statutory requirement that the Mayor, in revising the MTS, must have regard to –

- the effect the proposed revision would have on the Greater London Authority's principal purposes (promoting economic development and wealth creation in Greater London; promoting social development in Greater London; promoting the improvement of the environment in Greater London.
- the effect it would have on promoting the health of persons in Greater London; promoting a reduction in health inequalities between persons living in Greater London; promoting the achievement of sustainable development in the UK; and climate change prevention and the consequences of climate change.

1.2.3 He must have regard to –

- the resources available for the implementation of the revised strategy;
- the need to ensure that the revised strategy is consistent with national policies announced by the Government and with such international obligations as the Secretary of State notifies to him.
- the need to ensure that the revised strategy is consistent with each of his 11 other statutory strategies (as set out in s 41 of the GLA Act).
- the desirability of promoting and encouraging the use of the River Thames safely, in particular for the provision of passenger transport services and for the transportation of freight;
- the need to do all that can reasonably be done to prevent, crime and disorder (including anti-social behaviour and behaviour adversely affecting the local environment) in areas within Greater London and the misuse of drugs, alcohol and other substances in those areas.

- 1.2.4 In formulating the policies to be included in the MTS the Mayor must make appropriate arrangements with a view to securing that there is due regard to the principle that there should be equality for all people, and the need to promote equality of opportunity for all persons irrespective of their race, sex, disability, age, sexual orientation or religion, to eliminate unlawful discrimination and to promote good relations between persons of different racial groups, religious beliefs and sexual orientation.
- 1.2.5 The MTS must also contain such of the available policies and proposals relating to the subject matter of the strategy as the Mayor considers best calculated to do the following (except to the extent that the Mayor considers that any action that would need to be taken by virtue of those matters is not reasonably practicable in all the circumstances of the case):
- To promote improvements in the health of persons in Greater London (including mitigating any detriment to health which would otherwise be occasioned by the revision);
 - To promote the reduction of health inequalities between persons living in Greater London (including mitigating any increase in health inequalities which would otherwise be occasioned by the revision);
 - To contribute to the achievement of sustainable development in the UK;
 - To contribute towards the mitigation of, or adaptation to, climate change in the UK.
- 1.2.6 Once the strategy is published, the Mayor must exercise the powers of the GLA for the purpose of securing the services and facilities set out in the new MTS. TfL is under a duty to exercise its own powers to secure and facilitate the implementation of the new MTS generally. Persons and organisations exercising functions in respect of Greater London, including the 32 London boroughs and the Corporation of London, are under a statutory duty to have regard to the MTS when exercising any function. The MTS also forms the basis for the Corporation's and London Boroughs' Local Implementation Plans (LIPs), which must contain proposals that are consistent with the MTS and seek to implement its policies and proposals in their particular area.

1.3 The Development of a new Mayor's Transport Strategy

- 1.3.1 The first Mayor published his Transport Strategy in July 2001, with a ten-year time horizon. Two limited revisions were made to the Strategy: one in 2004 to provide for the implementation of the Western Extension to the Central London Congestion Charging Zone; the other in 2006 to allow for the introduction of a Londonwide Low Emission Zone.

- 1.3.2 However there remained major challenges for transport in London which could not be adequately addressed within the revised 2001 Strategy. In addition, the election of a new Mayor of London, Boris Johnson, in May 2008, means that it is timely to revise the Transport Strategy. As set out in the Public Draft MTS, the projected continued growth of London after 2017 will put greater pressure on the transport system and present challenges for road congestion, air quality, CO₂ emissions and quality of life. The investment set out in TfL's ten year Business Plan as published in November 2008, and the government's High Level Output Strategy for railway investment and service improvements for the period 2009-14 (HLOS 1) will deliver significant benefits in terms of increased capacity and service improvements, but will not address all of the challenges facing London.
- 1.3.3 In addition, a number of significant events have also occurred since the 2001 MTS was published including the successful bid to host the 2012 Olympic and Paralympic Games, Parliament's approval for the commencement of work on Crossrail, the implementation of the Public Private Partnership for the renewal of the Underground and the election of a new Mayor in 2008.
- 1.3.4 Hence, the Mayor considered that a new MTS is required to address these challenges and developments, and the Public Draft MTS sets out what further transport interventions are required, beyond TfL's Business Plan and HLOS1, in order to meet the Mayor's long-term aspirations for London.
- 1.3.5 TfL published an update to the Business Plan in the form of the 2009/10 Budget, in October 2009. This was accompanied by the annual announcement from the Mayor on public transport fares, and plans to change the operation of the Congestion Charge Zone, including the proposal to remove the Western Extension and introduce auto-payment accounts.
- 1.3.6 In November 2008 the Mayor published *Way to Go!*, his vision for transport in London. This set out the Mayor's principles for developing the Strategy, which were:
- Respecting choice
 - Keeping people informed
 - Developing outer London
 - Connecting transport and planning
 - Working with the Boroughs
 - Providing transport for all
 - Delivering value for money

1.3.7 There was an informal consultation on *Way to Go!* and the submissions have been used to inform the development of the draft Transport Strategy. Information about the formal consultation process for the development of the Strategy is provided below.

1.4 The Mayor's Vision for London, the Transport Strategy, the London Plan and the Economic Development Strategy

1.4.1 The development of the MTS has been closely aligned with the development of the Mayor's spatial plan for London (The London Plan), and the Economic Development Strategy. Doing so helped to ensure consistency and good use of resources as well as enabling the strategies to set out how the Mayor's vision for London will be delivered. A shared evidence base has been applied in developing the three strategies, and TfL, GLA and LDA officers have worked together throughout the process. The three documents together will form an integrated 'Strategy for London', with a single, long-term vision for the Capital.

1.4.2 The Mayor's Vision for London is set out in the public consultation draft of the London Plan, is that London should, over the years to 2031:

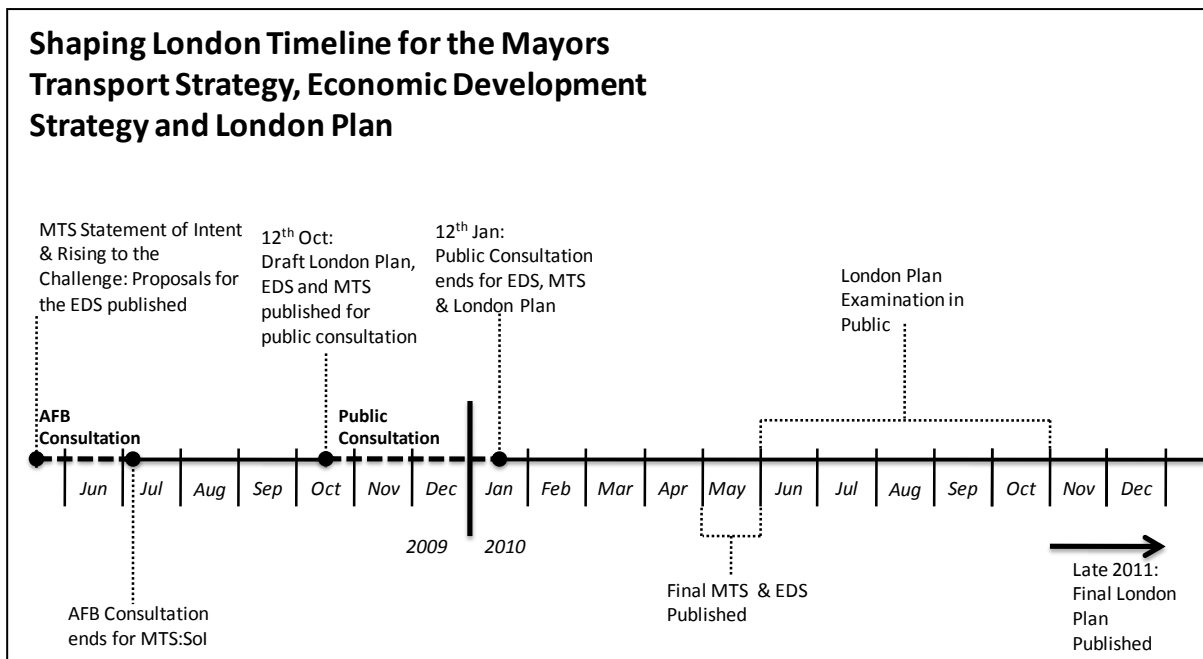
"Excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the twenty first century, particularly that of climate change."

1.4.3 There are six detailed objectives for what the Mayor's overarching vision should achieve. These have been reflected in the consultation drafts of the three strategies and are set out below:

1.4.4 Ensuring London is:

- A city that meets the challenges of economic and population growth
- An internationally competitive and successful city
- A city of diverse, strong, secure and accessible neighbourhoods
- A city that delights the senses
- A city that becomes a world leader in improving the environment
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities

1.4.5 As far as possible, the consultations for the three strategies have been aligned, although the London Plan is subject to different legal requirements which affect its timetable. Additionally, a further Minor Alteration to the draft London Plan was consulted on from 7 December 2009 to 1 February 2010 (which covered specific aspects of the draft Plan already under consultation). The overall timetable for the three strategies is summarised in the diagram below.



1.4.6 The Mayor’s vision for London is set out in the Public Draft MTS as follows:

“London’s transport system should excel among those of global cities, providing access to opportunities for all its people and enterprises, achieving the highest environmental standards and leading the world in its approach to tackling urban transport challenges of the 21st century.”

1.4.7 Six goals are set out for the achievement of this overarching vision in transport:

- Supporting economic development and population growth
- Enhancing the quality of life for all Londoners
- Improving the safety and security of all Londoners
- Improving transport opportunities for all Londoners
- Reducing transport’s contribution to climate change, and improving its resilience
- Supporting delivery of the London 2012 Olympic and Paralympic Games

1.4.8 These goals formed the structure of the policies and proposals that the Assembly and Functional Bodies were consulted upon, and then in the later public and stakeholder consultation on the Public Draft MTS.

1.5 Formal consultation with the Assembly and Functional Bodies

1.5.1 Before commencing the wider public and stakeholder consultation on the draft Strategy, the GLA Act requires the Mayor to consult with the London Assembly and the four Functional Bodies. These are: the London Fire and Emergency Planning Authority (LFEPA), the Metropolitan Police Authority (MPA), the London Development Agency (LDA) and Transport for London (TfL). The Mayor is also required, by Olympics legislation, to consult the Olympic Delivery Authority.

1.5.2 On 18 May 2009 the Mayor published the Transport Strategy Statement of Intent, for consultation with the Assembly and Functional Bodies. This consultation ran for 8 weeks until 13 July 2009. While this consultation was primarily intended for the Assembly and Functional Bodies, responses from other stakeholders, the public and businesses, were also considered.

1.5.3 The Assembly delegated responsibility for preparing its response to its Transport Committee; responses were also received from all four Functional Bodies and the ODA. In addition, there were 65 responses from stakeholders, 16 from businesses, six from the public and four from other organisations. These responses have been used to inform the development of the Public Draft of the Strategy.

1.5.4 TfL presented a Report to the Mayor on this consultation in October 2009. This report sets out TfL's analysis of the responses received and a full list of respondents, as well as more information on the consultation process and planned next steps.

1.5.5 As required by section 42A of the GLA Act, the Mayor submitted a statement to the Chair of the Assembly setting out which of the Assembly's comments on the Statement of Intent were accepted for implementation in the MTS (as prepared for public and stakeholder consultation), and which were not. Both TfL's Report to the Mayor and the Mayor's Statement to the Chair of the Assembly may be downloaded from the link below:

<http://mts.tfl.gov.uk/Read-the-strategy/Supporting-documents.aspx>

1.6 Other related strategies and developments

1.6.1 A number of other strategies and policy developments have informed the development of the draft Transport Strategy, the London Plan and the Economic Development Strategy. Further information on other strategies, policy development and data updates which are relevant to the Public Draft MTS is provided in Chapter 4 of this report.

The Outer London Commission

1.6.2 The Mayor is keen to ensure that outer London realises its full economic potential and set up the Outer London Commission (OLC) to advise on how outer London can play its full part in the city's economic success, including an exploration of potential land-use options for achieving this. In its interim conclusions, published in summer 2009¹, the OLC recommended that the focus for growth in outer London should be focused on existing town centres.

1.6.3 The Public Draft MTS therefore includes policies and proposals to support further growth around town centres and corridors, as well as other growth and intervention areas as identified in the London Plan.

The City Charter

1.6.4 Soon after taking office in 2008, the Mayor of London signed a 'Memorandum of Understanding' with the London Boroughs, setting out a shared intention to develop a "City Charter for London". This Charter was subsequently finalised in April 2009, signed jointly by the Chair of London Councils and the Mayor of London.

1.6.5 The City Charter is a voluntary agreement whereby the GLA, the London Boroughs and the City of London set out their shared principles, identify possible areas for joint action (including a set of outcomes for transport in London), and represents an agenda for the future of elected government in the Capital. The principles laid out in the City Charter have informed the development of the draft MTS and TfL's ongoing work, in particular the preparation for the second round of Local Implementation Plans. More information on these is given in Section 1.7 below.

¹ Outer London Commission (2009) Interim Conclusions

The Western Extension of the Central London Congestion Charging Zone

- 1.6.6 Following an informal consultation in autumn 2008, the Mayor proposed the removal of the Western Extension of the Congestion Charging Zone, subject to the completion of further statutory consultations and related processes. The proposal was included in the Transport Strategy Statement of Intent and in the Public Draft MTS (Proposal 127). The Mayor is asked to carefully consider the submissions made by the public and stakeholders in relation to this proposal before deciding whether or not to include it in the MTS. The implementation of this proposal will require further public and stakeholder consultation on a variation order to amend the Congestion Charging Zone Scheme Order to remove the Western Extension.

The Low Emission Zone

- 1.6.7 The Public Draft MTS also included a proposal to defer the phase of the London Low Emission Zone (LEZ) targeting heavier vans (LGVs) and minibuses, which had been planned for implementation in October 2010. The LEZ requires the heaviest and most-polluting diesel vehicles to meet emissions standards in order to drive within London without paying a daily charge. The scheme already applies to lorries, buses and coaches. The Public Draft MTS included a proposal (Proposal 94) to defer implementation of the LGVs and minibuses phase to an appropriate time in 2012. Again, the Mayor is asked to carefully consider the submissions made by the public and stakeholders in relation to this proposal before deciding whether or not to include it in the MTS. The deferral of the LGVs and minibuses phase to 2012 will require further public and stakeholder consultation on a variation order to amend the LEZ Scheme Order.

The Mayor's Air Quality Strategy

- 1.6.8 Also of relevance is the developing revision of the Mayor's Air Quality Strategy (MAQS) given the significant contribution made by road transport to emissions of nitrogen oxides (NO₂) and particulate matter (PM₁₀). A draft air quality strategy was subject to Assembly and Functional Bodies consultation in October 2009. Certain proposals relating to air pollutant emissions from transport, including the proposed deferment of the LGVs and minibuses phase of the LEZ, are common to both the MTS and MAQS. The Public Draft of the MAQS was launched for a 12 week public and stakeholder consultation on 28 March 2010. It is expected that the final MAQS will be published in autumn 2010.

Accessibility

- 1.6.9 The Public Draft MTS included an Accessibility Plan setting out proposals for the provision of transport that is accessible to people with mobility problems and a timetable for their implementation. TfL also consulted on its three-year Disability and Deaf Equality Scheme (DES) between September and December 2009, and the new Scheme for 2009-12 is now in place. The DES shows how TfL will promote disability equality and ensure that its activities meet the needs of disabled and deaf people better. The DES is a statutory document and it also forms part of the Mayor's Transport Strategy. The Accessibility Plan in the MTS draws out the key accessibility elements of the MTS and the DES shows how the plan will be implemented over the next three years. Progress in meeting the actions outlined in the DES will be reported every year as part of TfL's annual equality report, the first of which will be published to coincide with the Business Plan in December 2010.

1.7 Local Implementation Plans and London regional strategy development

- 1.7.1 Delivery of the policies and proposals set out in the MTS depends on action and support from a number of agencies, including national government. At London borough level, implementation of the MTS is via the Local Implementation Plan (LIP) prepared by each of the London boroughs and the City of London. The current LIP Guidance (published July 2004) is no longer relevant as it aligned to the 2001 Transport Strategy. TfL and London Councils jointly consulted on draft Guidance for the second round of LIPs (LIP 2) during the public consultation on the Public Draft MTS, and workshops were held with the boroughs. The Draft LIP Guidance, and the Public Draft MTS, reflected the spirit of the London City Charter.
- 1.7.2 London Boroughs are required to consider how their LIPs should be revised as soon as is practical after the publication of the MTS. The Draft LIP Guidance asked boroughs to set out in their forthcoming LIP submissions their transport objectives, their delivery plan and a performance monitoring plan. The goals that must be addressed in the LIP are the same as those set out for the MTS as a whole (see Section 1.4.7 above), with the exception of the goal relating to the 2012 Games. It is expected that the Mayor will publish the LIP 2 Guidance following the publication of the MTS.

1.7.3 On 11 December 2009 the Mayor confirmed the LIPs funding allocations for the boroughs in 2010/11, which totalled £155m. The system has been simplified, moving from 23 to five funding streams, and fairer funding has been introduced where needed. Boroughs will also have more flexibility to move funding between schemes. Funding has been provided for the following five streams: corridor; neighbourhood; Smarter Travel; area-based schemes; and maintenance. This funding is designed to improve local town centres and public spaces, create more shared space and simplify streetscapes. It will also help to increase cycling facilities, support electric vehicles and car clubs and smooth traffic flow, which are all key Mayoral priorities. Each borough has also been allocated an additional £100,000 to spend locally on transport as they choose.

Sub-regional Transport Plans

1.7.4 TfL, with the GLA and LDA, has also been working closely with the London boroughs and other partners to develop an integrated approach to sub-regional transport development and land-use planning based around five London regions (central, north, south, east and west London). In addition to the LIPs, non-statutory Sub-regional Transport Plans will be agreed between TfL and stakeholders for each sub-region, to assist in the delivery of the MTS and to form a framework for the development of LIPs.

1.8 The Integrated Impact Assessment of the draft MTS

1.8.1 When delegating the development of the new MTS to TfL, the Mayor also delegated to TfL the responsibility for undertaking the associated statutory Strategic Environmental Assessment (“SEA”) required by the Environmental Assessment of Plans and Programmes Regulations 2004, and also wider non-environmental impacts, in respect of the policies and proposals contained in the Public Draft MTS.

1.8.2 TfL engaged consultants to prepare an Integrated Impact Assessment (“IIA”), which integrates the following assessments of the Public Draft MTS’ policies and proposals: Strategic Environment Assessment (SEA), Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA). It also includes an Assessment of Economic Impacts (AEI). Community safety, including crime and disorder, is assessed as part of the HIA and EqIA. A Habitats Regulations Assessment (HRA) screening exercise has also been undertaken to determine if there is potential for impacts on the integrity of ‘Natura 2000 sites’ potentially affected by the draft MTS.

- 1.8.3 Prior to the commencement of the first phase of consultation, English Heritage, the Environment Agency and Natural England were consulted on the Scoping Report for the IIA, in accordance with SEA requirements. Appendix A of the IIA Report contains a summary of their comments, and how these have been addressed.
- 1.8.4 While the draft MTS was in preparation, the IIA process assessed and influenced its development. The assessment focused on how the Public Draft MTS delivers a high-level strategic direction and policy approach, consistent with the delivery of sustainable transport planning and operation within London.
- 1.8.5 Three strategic transport policy alternatives ('Options') were put forward for the draft revised MTS, with the aim of identifying how best to structure and deliver transport within Greater London in the period to 2031. A preliminary assessment was undertaken of these Options and the outputs of this assessment were used to influence the ongoing development and drafting of the preferred strategy reflected in the Public Draft MTS as published for consultation.
- 1.8.6 Option 1 was the 'do minimum' option, following the current London Plan approach to spatial and land-use planning and TfL investment as set out in the Business Plan to 2017/18 and the rail investment set out in HLOS to 2014. Option 2 – which became the preferred Option – uses the London Plan approach to spatial and land-use planning but extends the timeframe to 2026 and incorporated the revised MTS policies and proposals. Option 3 used an approach to spatial and land-use development involving greater emphasis on decentralised development, with revised MTS policies and proposals in line with this pattern of development.
- 1.8.7 There were three stages to the IIA assessment: the first stage was an assessment of the 'do minimum' option and a consideration of two land-use alternatives (and accompanying transport arrangements); the second stage assessed emerging policies and proposals for the preferred option for MTS (Option 2); and the third stage was the preliminary and final assessment of the draft strategy.
- 1.8.8 Assessment objectives and an Assessment Framework were used to assess the Public Draft MTS in terms of sustainability. The six headings of the Assessment Framework are as follows:
- To contribute to and facilitate more sustainable and efficient economic progress within London
 - To enhance equality and actively mitigate the barriers to this
 - To contribute to enhanced health and wellbeing for all within London

- To promote safety and security for all working, travelling and using London's transport services and facilities
- To contribute to the mitigation of, and adaptation to, climate change and
- To protect and enhance the physical, historic, archaeological and socio-cultural environment and public realm

1.8.9 The overall performance of the policies and proposals in the Public Draft MTS was assessed against each of these headings in terms of its significance and magnitude. For example, an impact could be positive or negative, and of major or minor magnitude, with gradations on each of these two scales. The IIA also contained recommended measures to enhance the implementation of the draft MTS, to maximise its impacts in terms of sustainability, and to mitigate any adverse impacts.

1.8.10 The IIA report also incorporates and integrates assessments covering proposals for the removal of the Western Extension Zone (WEZ) of the Central London Congestion Charging Scheme and the deferment of Phase 3 of the Low Emission Zone (LEZ).

1.8.11 The assessment is set out in the IIA Report, which was available during the public consultation on the Public Draft MTS, as described in Chapter 2. A Non-Technical Summary was also made available, and details of how to comment on the IIA were provided.

The Assessment findings

1.8.12 The overall performance of the policies and proposals contained in the Public Draft MTS against each of the primary objectives of the IIA Assessment Framework is set out in the table below.

Headline Primary Objective Assessment Objectives of IIA	Overall significance of impact
Primary Objective A – to contribute to and facilitate sustainable and efficient economic progress within London	Positive and of minor to moderate magnitude
Primary Objective B – to enhance equality and actively mitigate the barriers to achieving equality and inclusion	Positive and of moderate to major magnitude
Primary Objective C – to contribute to enhanced health and wellbeing for all within London	Positive and of minor to moderate magnitude
Primary Objective D – to promote safety and security for all working, travelling and using London transport services and facilities	Positive and of minor to moderate magnitude
Primary Objective E – to contribute to the mitigation of and adaptation to climate change	Positive and of minor to moderate magnitude
Primary Objective F – to protect and enhance the physical, historical, archaeological and socio-cultural environment and public realm	Positive and of minor to moderate magnitude

1.8.13 The IIA Report concluded that, “the Draft Revised MTS provides a clear strategic direction and framework for facilitating delivery of a more sustainable transport network, as articulated in its opening sections. It therefore progresses sustainability in line with the review of identified issues, DfT’s DaSTS and UK sustainability policy more broadly. By taking the framework of DaSTS and applying this within the specific context of London, the Draft Revised MTS facilitates a strategic approach that addresses the challenges facing London’s transport network and its users” (Section 6 of the IIA Report).

1.8.14 In addition, detailed assessments of two specific proposals, the removal of WEZ and the deferment of the LEZ light goods vehicles (LGVs) and minibuses phase, were undertaken to inform the overall assessment of the Draft Revised MTS. These assessments were set out in Appendix E and Appendix F of the IIA respectively.

1.8.15 With regard to the proposed removal of the Western Extension, the assessment was that the overall impact on London as a whole is anticipated to be marginal in terms of realised benefits and disbenefits, and scored it as neutral and not significant. With regard to the extension zone itself, the overall conclusion is that the proposal to remove WEZ will result in a mixture of benefits and disbenefits. Identified as a principal issue is how far measures set out in the draft MTS can mitigate the impacts of potentially increased congestion.

1.8.16 With regard to the LEZ phase targeting LGVs and minibuses, the overall impact of the deferral of this phase was assessed to be uncertain with both positive impacts on socio-economic factors and negative impacts on the environment and human health. These impacts would be minor in magnitude. The public and stakeholder consultation on the variation order to change the start date of the LEZ LGVs and minibuses phase will be supported by further analysis of the impacts of the deferral of this phase.

The Post-Adoption Statement

1.8.17 Following the formal adoption and publication of the MTS Post Adoption Statement (PAS) will be published in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004. This will demonstrate how the IIA and SEA process has informed the MTS. This IIA Statement will meet all the requirements of the Regulations and will additionally seek to reflect the wider scope of the assessment in respect of its coverage of sustainability.

1.8.18 The PAS sets out how the IIA has been undertaken, what this entailed and what effect the assessment process has had in terms of informing the MTS as adopted. Included within this is a consideration of the responses from the public and stakeholder consultation. The PAS also specifically considers the responses to the IIA Report received during the consultation and states how these have been considered in finalising the MTS. For this reason, TfL's Report to Mayor does not include comments made directly about the IIA in its analysis of responses within Chapter 3, of this Report to the Mayor.

2. The Consultation Process

2.1 Introduction

- 2.1.1 This chapter provides details of the public and stakeholder consultation carried out by TfL on the Public Draft MTS in 2009.
- 2.1.2 The public and stakeholder consultation ran for 13 weeks between 12 October 2009 and 12 January 2010 in accordance with Cabinet Office guidelines. Additional time was added to the usual 12 weeks because the consultation time ran over the Christmas holiday period.
- 2.1.3 In order to make good use of resources, and to effectively communicate the Mayor's overarching Vision for London, much of the communication activity for the MTS was integrated with activities to raise awareness of the consultations on the London Plan and the Economic Development Strategy (EDS).
- 2.1.4 Accordingly, the consultations on the three strategies were branded together under the tagline 'Help Shape London's Future', shared a website page (which contained click-through links to separate sites for each consultation), and ran joint consultation roadshows and, in some instances, shared stakeholder meetings. This was intended to foster an awareness of the strategies as an integrated approach to shaping London's future and to enable people to engage with, and respond to, all three in parallel.
- 2.1.5 The consultation process was accompanied by comprehensive engagement with stakeholders, building on the pre-engagement that had been undertaken during the first phase of consultation, which is described in TfL's Report to the Mayor on the Assembly and Functional Bodies consultation.
- 2.1.6 TfL sought to ensure that opportunities to maximise value for money were identified and taken up, and worked closely with the GLA and LDA to achieve this throughout the consultation. For this reason, for example, TfL invited stakeholders to download the draft MTS from the website rather than post out hard copies, although hard copies were available on request. Similarly, paid-for advertising was kept to appropriate levels and other cost-effective routes were deployed. The consultation exercise is described in detail below.

2.2 Information leaflet and questionnaires

- 2.2.1 TfL published a 32-page information leaflet entitled 'The Mayor's Transport Strategy: A consultation on the key policies and proposals', which included a questionnaire for respondents to complete by giving their views on the Public Draft MTS, and return to TfL for analysis.

- 2.2.2 The leaflet set out the context for the development of the MTS, and identified the key planned improvements contained within the draft Strategy. It then provided more information about the proposals as they relate to each of the six goals set out in the document, a summary of the projected impacts of the draft Strategy, and information on the next steps.
- 2.2.3 Public, businesses and organisations were encouraged to complete the questionnaire in order to help them express their views on the policies and proposals contained in the Public Draft MTS. The questionnaire offered respondents the opportunity to identify which measures they believed would most improve travelling in London, organised into a number of sections, such as 'Tube', 'Walking' and 'Buses'. Each of these sections concluded with a free text box provided for respondents to describe any other improvements they would like to see.
- 2.2.4 In a separate section, there was a question on the potential use of demand management measures and a question on the proposal to remove the Western Extension of the Congestion Charging Zone. Finally, a further free text box was provided for additional comments about the draft Strategy.
- 2.2.5 The questionnaire could be posted back to a pre-paid PO Box. Respondents could also use this PO Box address if they preferred to respond by letter.
- 2.2.6 In total, 2,937 completed hardcopy questionnaires were returned; and 630 open responses (by email and letter) were received. As described below, several requests for bulk copies of the leaflet and questionnaire were fulfilled, and the paper version also provided information about completing the questionnaire online. Section 2.4 below provides figures for questionnaires completed on the website.
- 2.2.7 A copy of the leaflet and questionnaire is provided within Annex A.

Distribution of the public information leaflet and questionnaire

- 2.2.8 The leaflet (including the questionnaire) was available in hard copy on request from TfL's call centre and 1,650 in total were distributed in advance to London boroughs for them to display in local libraries and other centres as they saw appropriate. Copies were made available at the road shows described in more detail below. The information leaflet and questionnaire were available on request in other languages and formats, and information on how to obtain these was provided in the standard leaflet and on the consultation website.
- 2.2.9 Table 2.1 below shows the number of MTS public information leaflets sent out for the Shaping London consultation, to both organisations and individuals.

Table 2.1: Number of MTS public information leaflets despatched

MTS Leaflets with questionnaires	Quantity
Organisations	
Transport for All	80
West London Residents Association	300
Portobello Road Market Traders	750
Age Concern	30
London Plan team at GLA	90
Total sent to organisations	1,250
Total sent to Individuals	4,200
Total bulk orders despatched	5,450

2.2.10 Included within these figures are requests for bulk copies of the MTS leaflet which were received from organisations which identified themselves to the call centre. Individuals were able to request up to 20 copies for their own use or onward distribution. Requests for more than 20 copies were fulfilled as set out in the table above.

2.3 Telephone helpline

2.3.1 A telephone number (0800 298 3009) was provided in the information leaflet, advertised on the Shaping London consultation website and on print advertisements for people who wished to request leaflets, a copy of the Public Draft MTS or to ask a question about the draft Strategy and the consultation process.

2.3.2 The telephone number was managed by TfL's call-centre, Granby Marketing Services, on behalf of TfL. Its operating hours were 8.00am – 8.00 Mon-Fri (answerphone service out of hours).

2.3.3 Some 189 calls were received during the public consultation, and the call centre sent out 4,333 leaflets. Queries were answered in the first instance by operators at the call centre but a number of queries were escalated to TfL officers where this was warranted.

2.4 Website

- 2.4.1 In order to make it easier for people to find out about and participate in all three Mayoral strategy consultations, the GLA hosted a joint landing-page on their website, using the 'Help Shape London's Future' tagline. The address for this was www.london.gov.uk/shaping-london. From this landing-page, users could access specific consultation information hosted on the relevant body's own website, with TfL hosting the information on the draft MTS. This could also be accessed directly from TfL's own website, www.tfl.gov.uk and people accessing the TfL home page were made aware of the consultation using promotional banners which could be clicked on to go to the Shaping London site.
- 2.4.2 The website contained a summary of the key points in the draft Strategy, and summaries of the main topics covered. It displayed a calendar showing the roadshow dates and a facility to search for upcoming roadshows by postcode. In a 'Facts and Figures' section, there were a number of maps indicating future scenarios in London, for example in terms of population growth and rail crowding. It was also possible to download (in PDF or RTF format) the full draft Strategy or individual chapters, and to download the information leaflet and questionnaire.
- 2.4.3 The website also invited viewers to have their say by using the online questionnaire, which replicated the questionnaire provided in the information leaflet. Respondents were required to provide an email address before completing the online questionnaire, in order to verify that responses came from individual email addresses. An email address was also provided, mts@london.gov.uk, for people who chose to register their views in this way.
- 2.4.4 The 'Supporting Documents' section of the website provided downloadable files for the Economic Evidence Base for the draft MTS, the Integrated Impact Assessment (IIA) and Habitats Screening Report prepared for the consultation. A Non-Technical Summary of the IIA was also provided here. The IIA documents were available from 19 October, one week after the consultation was launched.
- 2.4.5 In addition, this section contained information on the context to the development of the Public Draft MTS, including the informal consultation on *Way to Go!*, and the consultation with the London Assembly and Functional Bodies on the Statement of Intent. Relevant documents related to these stages could be downloaded from this section.
- 2.4.6 The MTS page received 36,778 visitors during the period of public and stakeholder consultation. 2,011 online questionnaires were completed and submitted.

2.5 Roadshows

2.5.1 In order to raise public awareness and engagement with the draft MTS, 21 roadshow events were held in venues around London. The roadshows were intended to promote all three of the Mayoral strategies under consultation, and were attended by officers from TfL, GLA and LDA. To enable a greater number of people to visit the roadshow, a number of events took place beyond usual office hours. The dates and venues of the roadshows are shown in Table 2.2 below.

Table 2.2: Roadshow dates and venues

Dates (2009)	Venue	Address
22 October	The Liberty Shopping Centre	Romford, Essex
23 October	Treaty Shopping Centre	44 Treaty Centre, High St, Hounslow
26 October	Bexleyheath Shopping Centre	Broadway, London
30 October	Bromley Central Library	High St, Bromley, Kent
2 November	Wood Green Library	High Rd, London
5 November	Ealing Central Library	Ealing Broadway Centre
6 November	Kensington Town Hall	Horton Street
9 November	*Stratford Shopping Centre	The Broadway, Stratford
11 November	*Whitgift Centre	Croydon, Surrey
13 November	Canary Wharf Shopping Centre	Canada Place, London
16 November	Harrow Library	5 St Johns Road, Harrow
18 November	Liverpool Street Station	West Mall, London
19 November	Brent Cross Shopping Centre	Hendon, London
20 November	Leytonstone Library	6 Church Lane, Leytonstone
24 November	Sutton Library	Civic Offices, St. Nicholas Way, Sutton
25 November	N1 Shopping Centre	21 Parkfield St, London
27 November	W12 Shopping Centre	Shepherd's Bush Green
30 November	*Westminster Reference Library	35 St Martin's Street, London
3 December	Mill Hill Library	Hartley Avenue
4 December	Clapham Library	1 Northside, Clapham Common
7 December	*City Hall	Greater London Authority, Queens Walk

2.5.2 At a number of roadshows, British Sign Language (BSL) interpreters were available. These dates are shown with an asterisk in the table above.

2.5.3 At each event, there was a stand with the 'Help Shape London's Future' banner and maps and images related to London and the three consultations. Copies of the information leaflet and questionnaire for the draft MTS were available and respondents could deposit completed questionnaires in a collection box which was later sent on to the consultation analysis contractors.

2.6 Other promotional activity

- 2.6.1 At the start of the consultation, press releases were sent out to national, London and local titles, and were followed later by trade media releases.
- 2.6.2 Editorial pieces were placed in a number of London titles to encourage people to take part in the consultation by visiting the Shaping London website to find out about the roadshows or complete the questionnaire online. TfL also used its regular page in the free Metro newspaper to publicise the consultation. On four occasions, the page was dedicated to the consultation, using a themed approach. On the first occasion (16 November) the page focused on “better streets to encourage walking and cycling.” Week two (25 November) focused on the accessibility of the transport system including physical accessibility, while on 30 November the article focused on the economy, for example, how Crossrail would enhance access to employment. A final piece on 6 January used the approach of highlighting particular questions and issues from the Public Draft MTS in order to encourage people to respond in the last week of consultation.
- 2.6.3 Additionally, advertisements were placed in the Metro newspaper during the public consultation. Advertisements were also placed in several local publications promoting the roadshows and MTS website as part of the ‘capital package’ of 61 local titles. TfL also secured a free London Lite insertion for the week commencing 9 November.
- 2.6.4 A poster advertising the consultation was placed in London Underground stations and bus shelters for four weeks from 27 November. These advertisements featured the MTS rather than the three integrated strategies. It included details of the website and the call centre phone number. TfL included an item on the public consultation in the 6 January 2010 edition of its weekly London Loop ‘ezine’ newsletter, which is sent to registered subscribers.
- 2.6.5 Copies of the consultation public information leaflet with questionnaire were placed in racks in Tube stations in Zone 1 for a four week period from 13 November.

2.7 Stakeholders consulted

- 2.7.1 Around 500 stakeholders were sent an email notifying them of the start of the public and stakeholder consultation. A full list of these stakeholders is attached at Appendix 1. Although previously consulted on the earlier Transport Strategy Statement of Intent, the London Assembly and Functional Bodies were included in those consulted on the Public Draft MTS.

- 2.7.2 The email contained brief information about how the Public Draft MTS had been developed alongside the draft London Plan and EDS as part of the overall Mayor’s Vision for London, its six goals and an overview of its strategic aims. It also set out the consultation dates, the roadshows and provided an email address for responding to the consultation, as well as an email address for any further queries. The email included a hyperlink to the Shaping London website, so that recipients could download the draft MTS and supporting documents.
- 2.7.3 A number of email recipients were identified as key stakeholders, and the email notified them of a series of briefings that TfL was planning for different types of stakeholder organisations as follows: business; environment; disability and community groups. Further information about these and other meetings convened during the consultation is provided in the following section.
- 2.7.4 A total of 151 stakeholders responded to the consultation. These are listed in Appendix 2.

2.8 Meetings and forums

- 2.8.1 TfL arranged meetings with stakeholders on request, and also attended a number of forums and meetings during the period of public and stakeholder consultation. In addition, TfL undertook a number of meetings as part of pre-engagement in advance of the start of the public and stakeholder consultation. Information about these meetings is provided in Appendix 3.
- 2.8.2 TfL scheduled briefings for political groups as set out in Table 2.3 below.

Table 2.3: Briefings for political groups

Date (2009)	Stakeholders
20 October	London group of Labour MPs
17 December	Tom Brake MP, Liberal Democrat spokesperson on London (The presentation was circulated to other London MPs).
7 January	London group of Conservative MPs

- 2.8.3 TfL offered a briefing to the London Assembly Transport Committee and other interested members at the time of launch of the draft MTS. This was declined, however, the Assembly Transport Committee held a formal meeting to question the Mayor on the draft MTS on Tuesday 20 October. TfL’s Commissioner and the Managing Director of Group Planning accompanied the Mayor to this meeting to answer questions on the MTS.

2.9 Advertising

- 2.9.1 A single, umbrella campaign was created to integrate all three consultations for the most cost effective approach. Advertisements were used to inform the public that the Mayor was seeking their views on how London will develop over the next 20 years. These adverts invited the public to find out more by visiting a roadshow or going online or calling the call centre for more information. Advertisements were placed in the Metro, the 'capital package' (see below), council publications, and a range of other titles. The media campaign ran from the start of the consultation on the 12 October to the 11 January 2010, the day before the consultation closed.
- 2.9.2 The capital package and the Metro adverts featured information about the local road shows taking place close to the area, split between North, South, East, West and Central areas. A combination of full page and 25 inch by 4 inch colour advertisements provided details of the upcoming venues, addresses, dates and times open as well as featuring the website address and call centre number.

Impact of print and media advertising

- 2.9.3 TfL's media agency estimated that the cumulative number of adult 'impacts' was approximately 25 million. One impact is equivalent to one person seeing or hearing an advert once. Therefore the number reflects the number of times a person could see or hear something about the consultation, rather than the number of individual people affected. This calculation does not include council, LGBT or BAME press, nor the London Gazette.

Table 2.4: London and local print media advertising to support the consultation

Barking and Dagenham Yellow Advertiser
Barking and Dagenham Post
Barnet and Hendon Press
Bexley Mercury
Bexley Times
Bromley Times
Bromley and Tandridge News
Croydon Advertiser
Croydon Post
Dartford and Swanley Times
Gravesend Express
Dartford Times
Gravesend Reporter

Ealing Gazette
Ealing Leader
East London Advertiser
Enfield Advertiser
Enfield Gazette
Fulham Chronicle
Romford Yellow Advertiser
South London Press
Southwark News
Stratford and Newham Express
Staines Informer
Staines Leader
Stratford Yellow Advertiser
Streatham Post
Surrey Mirror Series
Sutton and Epsom Post
Metro
Hackney Gazette
Hampstead and Highgate Express Series
Haringey Advertiser
Harrow and Wembley Observer
Harrow Leader
Hounslow Chronicle
Hounslow Informer
Iford Recorder
Iford and Redbridge Weekly Post
Islington Camden Gazette
Hornsey Journal Series
Kingston Informer
Lewisham and Greenwich Mercury
Mitcham Morden and Wimbledon Post
Newham Recorder Series
Redbridge and Iford Yellow Advertiser
Richmond and Twickenham Informer
Romford and Havering Post
Romford Recorder

The Docklands
The Wharf
Uxbridge Leader
Uxbridge Gazette
Waltham Forest Yellow Advertiser
Wembley and Willesden Leader Series
Wembley and Brent Times
West London Informer
London Informer

2.9.4 In addition a full page on the consultation and how to take part was advertised in the following London Borough publications:

Table 2.5: London Boroughs' press titles containing a consultation advertisement

Title	Borough	Dates (2009)
Westminster Reporter	Westminster	1 December
The Royal Borough	Kensington and Chelsea	7 December
Hammersmith and Fulham News	Hammersmith and Fulham	3 November
Brightside	Wandsworth	28 October
Lambeth Life	Lambeth	26 October
East End Life	Tower Hamlets	19 October
Hackney Today	Hackney	2 November
Your Camden	Camden	2 November
The Brent Magazine	Brent	28 October
Around Ealing	Ealing	1 November
Hounslow Matters	Hounslow	23 November
Arcadia Magazine	Richmond Upon Thames	30 October
My Merton	Merton	19 November
Sutton Scene	Sutton	18 November
Your Croydon	Croydon	28 October

Lewisham Life	Lewisham	23 October
Greenwich Time	Greenwich	20 October
Living	Havering	16 November
The News	Barking and Dagenham	17 October
Redbridge Life	Redbridge	2 November
The Newham Magazine	Newham	6 November
Waltham Forest News	Waltham Forest	2 November
Haringey People	Haringey	10 November
Our Enfield	Enfield	16 November
Harrow People	Harrow	26 November

Table 2.6: Other titles containing a consultation advertisement

Title	Dates (2009)
Gujarat Samachar	28 October
Urdu Times Weekly	29 October
Des Pardes	29 October
Polish Express	30 October
Bangla Mirror	30 October
Noticias	29 October
Londra Gazette	29 October
The Voice	29 October
Diva	5 November
The Gay Times	21 October

2.10 London Gazette Notice to publicise the consultation

2.10.1 A notice publicising the consultation was published on 12 October 2009 in the *London Gazette*. The notice included the following information:

- Notice that the Mayor had issued a draft of the proposed MTS for consultation with the public and stakeholders
- Details (including web address) of where the leaflet summarising the proposal and other supporting documents could be obtained
- The postage-paid address for people to submit their questionnaires and any additional comments
- The date by which representations were to be received.

3. Analysis of Response by Theme

3.1 Introduction to analysis of responses by theme

3.1.1 This chapter sets out TfL's analysis of responses received to the consultation and any changes that TfL is recommending to the Mayor. The forty-five themes in this chapter follow, where possible, the order in which these areas were addressed in the Public Draft MTS, although there are some themes which cover a number of different areas in the strategy. An index for these forty-five themes follows this section.

3.1.2 It will be useful at the start to clarify the approach and conventions used in this chapter, starting with how the Strategy is referenced, and then providing some background on the formats of the responses received, and how these have been used in this chapter.

The Public Draft MTS and the MTS

3.1.3 In this chapter, it is necessary to refer to both the version of the draft MTS that was published for public and stakeholder consultation in October 2009, and the version which is being recommended to the Mayor by TfL in April 2010. This is because in many cases the numbering of the Sections, Figures, Policies and Proposals has changed between the two versions. The former will be referred to as the Public Draft MTS (abbreviated to PD MTS), and the latter as the MTS.

3.1.4 This chapter considers comments made on the PD MTS, and then sets out TfL's recommendations for the MTS. Each section in this chapter has the same 'three-part' structure: beginning with a reference to where the theme can be found in the PD MTS; then providing the TfL Response; and then TfL's Recommendations.

3.1.5 In the first and final parts of each section, the references are given for the PD MTS. In the middle part, 'TfL Response', reference is first made to the MTS, with the PD MTS references given in square brackets, to enable a comparison to be made more easily. Where there is no difference in numbering, only one reference is given.

Consultation responses

- 3.1.6 As noted in Chapters 1 and 2, TfL received 151 consultation responses from stakeholders, and 5,578 responses from members of the public, businesses and other organisations. TfL analysed the responses from stakeholders and its contractor, Accent Market Research, analysed the responses from the public, businesses and other organisations.
- 3.1.7 This chapter sets out an analysis of the responses by theme, identifying issues raised by stakeholders and by the public, businesses and other organisations. It also sets out TfL's recommendations to the Mayor. As far as possible, the order and naming of the themes within this Chapter reflects the structure of the public draft MTS.
- 3.1.8 Stakeholders responded to the consultation by letter or email, providing their comments on the draft MTS using a structure of their choosing. The majority of responses from members of the public, businesses and other organisations (4,948) were made using the paper and web-based questionnaire that TfL made available. The questionnaire invited respondents to tick boxes to indicate their response to specific closed questions as well as offering the opportunity to make further comment in open-text boxes. The remaining 630 responses from the public, businesses and other organisations came by letter or email.
- 3.1.9 The several methods of responding mean that there is some variety in the type of analysis available and it is important to note that this chapter contains information from across the range of response channels and respondents.
- 3.1.10 As indicated above, the questionnaire was the main response channel for members of the public, and so for this group the principal data available relates to their responses to specific closed questions.
- 3.1.11 Comments made by respondents providing responses by email or letter as well as comments made in free-text fields in the questionnaire were analysed by reference to the same code-frame (which is provided within Annex A). This enabled the analysis to use the same approach to identifying common themes regardless of whether they came from stakeholders or the public, or via letters and emails or questionnaires.
- 3.1.12 Section 3.2 below contains more detail about the questionnaires and how the analysis of public responses has been used in this chapter. This is intended to aid understanding of the data from the questionnaire responses which is used in this chapter. A copy of the questionnaire is provided within Annex A.

3.1.13 A list of the stakeholders who responded is provided at Appendix 2, and summaries of their responses are at Annex B. Accent Marketing and Research has prepared a report on the public, business and other organisation responses which provides more detail on these responses, and this is at Annex A.

Public, business and other responses by questionnaire, email and letter

3.1.14 The questionnaire contained both closed and open questions about the draft MTS. Data from Question 1, which sought demographic information, is not used in this chapter but is provided within the report at Annex A. Question 2 asked respondents to address ten categories relating to transport in London: Tube, rail, interchange, cycling, walking, buses, information, better streets, freight, and the Thames. Under each category was listed between four and six measures that had been proposed in the public draft MTS to improve travelling in London. Respondents were invited to tick those that they considered would bring most benefit (and there was no restriction on the number of measures that respondents could select).

3.1.15 The sections on these categories in Chapter 3 of this report therefore contain information about the response to Question 2. The information is twofold: firstly the proportion of respondents to these categories, and then the most frequently ticked measure for each category. The base for these proportions is 4,948 (all questionnaire respondents).

3.1.16 Additionally, under each category a final tick-box was available for respondents to check if they wished to identify any other measure that they considered would bring benefits in that area. Respondents were then invited to specify this measure using an open text box. 39% (1,909) of respondents made one or more comments in the open text boxes in Question 2. These comments were coded and the proportions are quoted in Chapter 3. Percentages for these comments use the number of respondents who ticked the 'Other' box (1,909) as a base.

3.1.17 Question 3 contained two closed questions, asking respondents to tick one of a number of boxes to indicate how far they agreed or disagreed with two propositions. The first question was: "To what extent do you agree or disagree that a fair system of managing demand for road use should be used if necessary?" The second question asked "To what extent do you agree or disagree with the proposal to remove the Western Extension." Data from both issues is included in the relevant sections in Chapter 3 where appropriate. In both cases the base for the percentages is all questionnaire respondents (4,948).

- 3.1.18 Question 4 provided an open text box for any additional comments that the respondent wished to make on the draft MTS. Here, 40% (1,979) of respondents made a comment; again, these comments were coded and are cited in Chapter 3 where relevant. The base for these percentages is all questionnaire respondents (4,948).
- 3.1.19 As noted above, some members of the public, businesses and organisations chose to respond by letter or email rather than via the questionnaire. The numbers using this 'open response' channel were: 551 members of the public; 25 businesses and 55 organisations (a total of 630 open responses).
- 3.1.20 The responses from this group were coded using the same code-frame as was used for the open text in the questionnaire responses and stakeholder responses, enabling an analysis of the issues raised most frequently-raised by this group.
- 3.1.21 As indicated, the number of entirely 'open' responses is relatively small and it is therefore less useful to refer to proportions of comments raised for this group. Chapter 3, therefore, lists the most frequently raised issues from this response channel and briefly describes the type of comment made.

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1. Inner London

Section 3.2.2 of the Public Draft MTS describes the context and challenges facing inner London. All policies that apply London wide are relevant to inner London. A list of key issues raised during the consultation can be found below.

Analysis of responses

Seven stakeholders commented on issues relevant to this section. These were: Chartered Institution of Highways and Transportation, Friends of Capital Transport Campaign, London Borough of Bexley, London Councils, London Forum of Amenity and Civic Societies, RAC Foundation and Valerie Shawcross AM.

Comments on inner London from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- Recognise the considerable walking and cycling potential in inner London
- The role of the road network in inner London
- The role of cars in outer London and the effect this has on inner London
- Need to respond to the needs of inner London with regard to transport in the context of outer London growth

TfL Response

Walking and cycling

The walking and cycling policies - Policies 3, 11, 17 and Proposals 52, 53, 54, 55, 57, 91, 116 [51, 52, 53, 54, 56, 90, 115] described in the PD MTS apply across the whole of London, including inner London. The exact location and nature of cycle facilities, including parking and changes to road layout will be considered on a case-by-case basis in discussion with boroughs and others. Funding for boroughs is agreed via the LIPs process. TfL recommends additions to sections 5.13.2 [5.12.2] and 5.13.5 [5.12.5] concerning potential expansion of the Cycle Hire scheme and the implementation of Cycle Superhighways are recommended.

Cars and the road network

The PD MTS considers the role of the car and the road network in inner London in section 3.2.2. It contains proposals for mode shift to public transport, walking and cycling and these proposals will apply to outer London. TfL recommends no change.

Inner London's transport needs

The effects of growth throughout London and the particular transport needs of inner London have been considered in the PD MTS (section 3.2.2). While TfL does not recommend any changes to this section, a change to Proposal 13 is recommended.

TfL Recommendations

Amend wording of MTS to specify expansion of the Cycle Hire scheme in inner London subject to sufficient demand and feasibility (section 5.12.2 and Proposal 53)

Amend wording of MTS to note network of Cycle Superhighways running from outer and inner to central London (section 5.12.5)

Amend Proposal 13 to cover improvements that could be made to inner suburban rail services if the Mayor had a greater direct role

2. Outer London

Comments on outer London do not always relate to a specific section of the public draft MTS. Section 3.3 of the Public Draft MTS, 'Planning for London's development' considers the projected growth patterns for the Capital, the findings of the Outer London Commission and the implications for transport planning in outer London, but all of the public draft MTS should be considered relevant to this section.

Analysis of responses

Thirty-eight stakeholders commented on issues relevant to this section. These were:

Association of British Drivers, British Telecom, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Logistics & Transport, Energy Saving Trust, Friends of Capital Transport Campaign, Friends of the Earth, Highways Agency, Institute of Advanced Motorists (IAM), Kent County Council, London Borough of Barking & Dagenham, London Borough of Bexley, London Borough of Bromley, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Haringey, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Merton, London Borough of Redbridge, London Borough of Sutton, London Borough of Waltham Forest, London Councils, London Development Agency, London Forum of Amenity and Civic Societies, London Gatwick Airport, London Thames Gateway Development Corporation (LTGDC), LSDC, RAC Foundation, Royal Borough of Kingston upon Thames, South East England Regional Transport Board, SWELTRAC, Tandridge District Council, The Chartered Institution of Highways and Transportation, The South London Partnership and Valerie Shawcross AM.

Comments on outer London from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- Support for findings of the Outer London Commission but some concern that MTS insufficiently reflects these
- Greater car use in outer London: both the need to recognise this and the implications for measures to provide alternatives and achieve more use of sustainable modes
- New infrastructure schemes do not directly benefit outer London

- Comment about specific part of outer London and measures required there
- Further consideration of cross-boundary travel and Outer Metropolitan area in transport planning
- Agreement with local and sub-regional approach to outer London
- Welcomes focus on outer London

TfL Response

The Outer London Commission

The Outer London Commission concluded in its interim findings, that, while growth should be supported in outer London town centres, this should be focussed on existing town centres, rather than on a smaller number of strategic hubs. This approach has informed the development of the Mayor's three strategies for London (MTS, EDS and the London Plan), as set out in section 3.3 of the Public Draft MTS. TfL does not recommend any changes to this section.

Car use in outer London

It is acknowledged in the PD MTS (section 3.3) that there is greater car use in outer London, and the MTS seeks to recognise this as a characteristic that is likely to remain, while also setting out measures to encourage the use of more sustainable modes (see Section 5.13 [5.12] and 5.14 [5.13] for policies and proposals to encourage walking and cycling), and in ensuring that developments maximise opportunities for walking and cycling (section 3.3). Therefore no changes are recommended.

New infrastructure schemes do not directly benefit outer London; schemes for specific locations

There was some concern that specific new schemes set out in the PD MTS, for example the Tube upgrade and Crossrail, would not directly benefit outer London. The PD MTS sets out the wider economic benefits of Crossrail (section 5.2.3, and in the case study) and Proposal 6 sets out the commitment to consider future extensions of the line. In terms of committed funding, the draft MTS cannot go beyond the 2017/ 18 period. Decisions about additional new infrastructure will be made subject to available funding as set out in future Business Plans, and a consideration of the options on a case-by-case basis. In the meantime, the specific details of any more local measures would be considered as part of the sub-regional transport planning and LIPs processes. TfL recommends no changes.

Cross-boundary travel

Cross-boundary journeys are considered within Chapter 3 which acknowledges the importance of London in terms of sub-regional, inter-regional, national and international travel. Section 4.2.2.1 and Policy 2 reflect the Mayor's position on these. TfL recommends no changes.

TfL notes the support for the approach to outer London and the sub-regional transport planning process.

TfL Recommendations

No recommendations

3. Delivering radial capacity and connectivity improvements into central London/ Metropolitan town centres (radial connectivity)

Radial connectivity is covered in sections 4.2.2.3 and 4.2.2.5 of the Public Draft MTS, and is considered throughout the strategy.

Analysis of responses

Nine stakeholders commented on issues relevant to this section. These were: Community Transport Association, Corporation of London, London Borough of Brent, London Councils, London Borough of Lambeth, London Borough of Waltham Forest, Park Royal Partnership (PRP), Royal Borough of Kingston upon Thames and Westminster City Council.

Comments on radial capacity and connectivity from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- Need for more detail on the context of MTS and on Opportunity Areas
- Call for radial rail links at a specific location
- Call for further capacity on radial links
- Support for proposals on radial connectivity

TfL response

Context

Chapter 3 of the public draft MTS sets out the context.

The public draft MTS includes references to radial connectivity in section 4.2 and opportunity areas in section 4.5 but TfL considers that amending the text could make this more explicit with regard to strategic outer London development centres in Policy 6 and the contribution of opportunity areas in Section 4.5.

Links at named locations

One stakeholder named a location where it considered there should be further provision of radial rail links. The PD MTS contains funded improvements to 2017. Any further proposals for rail would be considered on a case by case basis. The MTS provides a framework, but is not the place for detailed scheme proposals. More local schemes may also be dealt with by Sub-regional Transport Plans. TfL recommends no change.

Further radial capacity

The PD MTS sets out planned improvements to radial capacity and connectivity to central London in Section 4.2.2.3 and Policy 4; and to metropolitan town centres in 4.2.2.5 and Policy 6. However, it is recommended that some additional text on the development of transport proposals for existing and potential metropolitan town centres and strategic outer London development centres is added to section 4.2.2.5 and Policy 6.

Comments of support are noted.

TfL Recommendations

Amend Policy 6 to include reference to current and potential metropolitan town centres and strategic outer London development centres

Include reference to assessing potential contribution to supporting development of intensification areas and opportunity areas in Section 4.5

Additions to Paragraphs section 4.2.2.5

4. Orbital Connectivity

Section 4.2.2.6 of the Public Draft MTS describes the approach to orbital connectivity.

Analysis of responses

40 stakeholders commented on issues relevant to this section. These were: ATOC, Campaign for Better Transport, Campaign to Protect Rural England, Clive Efford MP, Corporation of London, Federation of Small Businesses, First Capital Connect, Friends of Capital Transport Campaign, Hertfordshire County Council, IDAG, Jenny Jones AM, London Borough of Barnet, London Borough of Bexley, London Borough of Brent, London Borough of Bromley, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Haringey, London Borough of Harrow, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Merton, London Borough of Richmond upon Thames, London Borough of Sutton, London Borough of Waltham Forest Council, London Councils, London Forum of Amenity and Civic Societies, London Liberal Democrats, London Visual Impairment Forum, Park Royal Partnership (PRP), RAC Foundation, Royal Borough of Kingston upon Thames, SWELTRAC, The Chartered Institution of Highways and Transportation, The South London Partnership, Transport for All, Valerie Shawcross AM, West London Partnership and Westminster City Council.

Comments on orbital connectivity from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- Capacity of orbital roads and other local movements
- More on orbital bus routes
- Improvements to interchanges for orbital travel
- Desire for enhanced orbital rail
- The need for more infrastructure, including Underground extensions
- Support for Crossrail 2
- The importance of striking a balance between orbital and radial travel
- Promotion of orbital cycle routes
- Promotion of mode shift on orbital routes
- Need for better information and journey planning

TfL response

Local road movements

Local road movements will be considered in the development of the Sub-regional Transport Plans and LIPs, and no change is recommended.

Local bus routes

New bus routes are decided as a result of regular bus network reviews as set out in Proposal 23 of the PD MTS (and see section on Buses in this chapter).

Interchange

Sections 5.10.1-2 describe the approach to improving interchanges. Measures to improve interchange (Proposal 5, 45, 46) would apply across London and facilitate orbital travel movements; therefore no change is recommended.

Infrastructure

The public draft MTS contains funded improvements to 2017. Any further proposals for orbital rail, light rail and additional infrastructure would be considered on a case by case basis. The MTS provides a framework, but is not the place for detailed scheme proposals.

Crossrail 2

Support for Crossrail 2 is noted.

Orbital and radial travel

There is support for orbital transport movements (section 4.2.2.6, Policy 7) in the PD MTS and further detail on specific corridors will be in the Sub-regional Transport Plans.

Sections 4.2.of the PD MTS outlines how transport will support economic development and population growth, including radial travel into the Central Activities Zone and Metropolitan town centres as well as support for enhanced orbital travel. TfL recommends no change.

Cycle routes

The PD MTS recognises the potential to expand cycling in outer London (section 5.13 [5.12]) and identifies where interventions may be appropriate, although it is not intended to be prescriptive.

Mode shift

The PD MTS contains measures, to promote modal shift which apply throughout London including orbital journeys. Policy 11 sets out this commitment, and no change is recommended.

Information

The PD MTS contains measures to improve information and journey planning (Policy 21) to help people avoid travelling through central London unnecessarily, and no further changes are recommended.

TfL Recommendations

No changes recommended

5. Natural Environment

Section 4.3.3 of the Public Draft MTS describes the approach to enhancing the built and natural environment. Policy 14 and Proposals 82-84, 89 and 112 take this approach forward.

Analysis of responses

Eleven stakeholders commented on issues relevant to this section. These were: Campaign to Protect Rural England, Corporation of London, English Heritage, Environment Agency, Friends of the Earth, London Borough of Havering, London Borough of Lambeth, London Borough of Redbridge, London Borough of Tower Hamlets, London TravelWatch and Royal Parks.

One per cent of consultation representations from individuals and one per cent from businesses concerned the impact of transport on the natural environment. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

Blue Ribbon Network

- Change MTS to acknowledge the value of the Blue Ribbon Network for its biodiversity benefits and recreational opportunities

Natural Environment Policy and Proposal

- Change MTS by adding a proposal for the Mayor to work with DfT to recognise environmental quality of railway land in the High Level Output Specification (HLOS)
- Change MTS by adding words to the end of Policy 14, providing more detail and funding sources for Proposal 89, and linking Proposal 89 to London Plan Policy 2.18

Heritage

- Comment made that it is important to engage stakeholders on tree planting in order to recognise historic landscapes and conservation areas

Support

- Support from a majority for the inclusion of transport's contribution to improving the quality of the natural environment. Support for tree planting. Comment made that synergy exists between climate change policies and protecting and enhancing biodiversity

TfL Response

Blue Ribbon Network

In addition to the Blue Ribbon Network providing opportunities for sustainable transport, TfL acknowledges that it also provides opportunities for the preservation and enhancement of biodiversity, recreation and the protection of important landscapes and views. Therefore, TfL considers that a change to the PD MTS in section 4.3.3 will better recognise this.

Natural Environment Policy and Proposal

Proposal 90[89] includes the action for the Mayor to work with DfT and Network Rail to improve the quality of the natural environment with regard to railway lines. TfL does not recommend a change. TfL considers the existing wording of Policy 14 is appropriate and does not recommend a change. In common with other proposals in the strategy Proposal 90[89] does not contain specific details about funding. In general the MTS does not link proposals to London Plan policies. TfL does not recommend a change.

Heritage

The PD MTS includes the Mayor's vision for London which implies the protection of London's built and landscape heritage, as well as its promotion. Section 7.3 of MTS sets out TfL's approach to delivery which includes adhering to statutory procedures and consents. TfL does not recommend a change.

Support

TfL notes support for inclusion of a reference to transport's contribution to improving quality of natural environment in MTS, in section 5.20[5.18.4] and particularly tree planting. TfL accepts that synergy exists between climate change policies and protecting and enhancing biodiversity.

TfL Recommendations

Amend section 4.3.3 on natural environment to include reference to London's Blue Ribbon Network as an important element of London's natural environment

6. Enhancing the Quality of Life for all Londoners: improving health outcomes

Sections 4.3.4 to 4.3.6 of the Public Draft MTS are the main sections which describe the approach to improving health outcomes in London, however health is included throughout the draft MTS. Policies 13 (journey experience), 14 (built and natural environment), 15 (air quality), 16 (noise), 17 (walking and cycling), 18, 19 and 20 (safety and security) and Proposals 13, 18, 20, 21, 25-27, 41, 42, 47, 50-54, 56-88, 89-94, 102, 104, 107, 109-112, 114, 115, 128 and 129 take this approach forward.

Analysis of responses

Nineteen stakeholders commented on issues relevant to this section. These were: Age Concern London, Campaign for Clean Air in London, Campaign to Protect Rural England, Chartered Institute of Environmental Health, Commissioning Support for London-NHS, Community Transport Association, Environment Agency, Friends of the Earth, London Borough of Barking & Dagenham, London Borough of Sutton, London Borough of Waltham Forest, London Cycling Campaign, London Primary Care Trusts, NHS Lambeth, NHS London, NHS Tower Hamlets, Parliamentary Advisory Council for Transport Safety, Sustrans and Valerie Shawcross AM.

Comments on health from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

Benefits of active travel

- Change MTS to emphasise the potential physical and mental health benefits of the promotion of active travel such as cycling and walking and travel planning

Supportive of MTS

- Support for the proposed measures with regard to supporting healthy travel options and addressing health inequalities

Health Inequalities

- Concern about lack of consideration of groups which may be more adversely affected by adverse transport impacts (older people, those in deprived areas or on lower incomes)
- Concern about absence of link between MTS and the Mayor's Health Inequalities Strategy
- Comment made that boroughs ought to reflect the need to reduce health inequalities in their delivery plans

Journey Experience

- Comment made that journey experience can be a cause of stress

NHS

- Comment made that TfL and the NHS must work together to co-ordinate door to door services and NHS commissioned transport, and promote healthy travel options at NHS locations

Climate Change

- Comment made that there is synergy between climate change policies and health outcomes

MTS Goals

- Change MTS to include health within the Safety & Security goal

TfL Response

Benefits of active travel

TfL notes the support for the inclusion of measures to encourage active travel modes. While the public draft MTS includes the health benefits of these modes and contains many measures to promote walking and cycling (Policy 17, section 4.3.6, and in the sections on The Cycling Revolution Making Walking Count), TfL accepts that this could be given more emphasis and additions have been made to section 4.3.6 to note the benefits in addressing obesity and improving mental health and section 5.14.1 [5.13.1] to recognise the health benefits of walking.

Health Inequalities

TfL accepts that there should be clearer reference made to the Mayor's duty with regard to health inequalities and it is recommended that changes are made to Section 1.5 and section 4.3.6 to reflect this. Also in this section it is recommended that a more explicit reference is made to the disproportionate adverse impacts of transport on certain groups. TfL recommends changes to Section 5.13.4 [5.12.4] to emphasise the work on mainstreaming cycling to encourage currently under-represented groups, and to note the importance of travel planning; and to section 4.3.3 on enhancing the built environment to encourage walking for health and relaxation. However TfL considers it is inappropriate to prescribe in the MTS how boroughs should address health inequalities and does not recommend a change.

Journey Experience

Section 4.3.2 of the public draft MTS recognises the effect that journey experience can have on health and wellbeing and measures to improve this are set out in Policy 13 and taken forward in proposals throughout the strategy. TfL does not recommend a change.

NHS

TfL recognises the importance of sharing best practice and working with the NHS and other health organisations, as in the case study in Section 4.3.5 'Working with the NHS to improve access to health services'. A further addition is recommended by TfL to this case study on sharing best practice and ensuring that Mayoral strategies are mutually supportive wherever possible.

Climate Change

With regard to the impact of climate change on health, TfL recommends that text is included in Section 5.23 [5.21] to recognise these effects.

MTS Goals

While health is related to Safety & Security, it is considered that it fits best within the goal of Enhancing the Quality of Life for all Londoners and a change is not recommended.

TfL Recommendations

Amend the following sections:

Section 1.5 add reference to Health Inequalities Strategy

Section 4.3.6 to have reference to wider health benefits of walking and cycling, and to the Mayor's duty to address health inequalities. Also 4.3.6 to refer to health outcomes rather than impacts

Section 5.12.4 additions on mainstreaming cycling to under-represented groups, and use of travel planning

Section 5.13.1 add text to recognise the health benefits of walking

Section 4.3.3 add text on the importance of quality open spaces to encourage walking

Section 4.3.5 Case Study – add text on sharing best practice and ensuring that strategies are mutually supportive

Section 5.21 to recognise the impact of climate change on health

7. Links to the London Plan and Economic Development Strategy

Section 3.3 of the draft MTS describes the broad approach to planning for London's development. Section 4.2 describes how the approach to supporting economic development and population growth and section 4.5.3 describes the approach to tackling deprivation and targeting transport investment in regeneration areas.

Analysis of responses

66 stakeholders commented on issues relevant to this section. These were:

ASLEF, CPRE, Chartered Institute of Logistics & Transport UK, Cllr Peter Morgan – Bromley, Cyclists Touring Club, Energy Saving Trust, Environment Agency, Friends of Capital Transport Campaign, Guide Dogs for the Blind Association, Heathrow Airport Limited, Highways Agency, Inclusion London, Institute of Civil Engineers (ICE), Jenny Jones AM, Licensed Private Hire Car Association (LPHCA), London Assembly, London Borough of Barking & Dagenham, London Borough of Bexley, London Borough of Brent, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hackney, London Borough of Haringey, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Lambeth, London Borough of Merton, London Borough of Newham, London Borough of Southwark, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Civic Forum, London Councils, London Development Agency, London Forum of Amenity and Civic Societies, London Liberal Democrats, London Primary Care Trusts, London Sustainable Development Commission (LSDC), London Thames Gateway Development Corporation (LTGDC), London TravelWatch, National Joint Utilities Group (NJUG), Network Rail, NHS London, Olympic Delivery Authority (ODA), Park Royal Partnership, Parliamentary Advisory Council for Transport Safety, Port of London Authority, RAC Foundation, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Sustrans, SWELTRAC, The South London Partnership, Transport for All, Transport Planning Society, Valerie Shawcross AM, Walk England, West London Partnership and Westminster City Council.

Comments on the London Plan and Economic Development Strategy from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues Raised

The following is a list of issues raised:

- Support for the approach set out in the draft MTS to integrate land use and transport planning and the approach to developing the London Plan and Economic Development Strategy (EDS) in parallel
- Need for greater consistency between the MTS and emerging London Plan and EDS
- There should be greater emphasis on linking land use and transport planning - the MTS fails to show how it will support economic development, population growth and the emerging London Plan/EDS, particularly in the Opportunity Areas. Specific local schemes linking to individual Opportunity or Intensification Areas were raised and requested to be included in the MTS
- The MTS may need to recognise additional highway capacity may be needed to support regeneration
- The MTS should make clear that transport infrastructure is key to sustainable growth
- The growth forecasts are not robust and the MTS should contain a number of scenarios to reflect possible lower growth rates due to current economic conditions
- Growth is not geographically represented, therefore it is impossible to tell how the road network will perform in future
- The MTS should prioritise growth areas
- Policy 9 should mention road safety
- The MTS, London Plan and EDS should have a single 'house' style
- The Mayor should consider limitations posed by running major consultation simultaneously

TfL response

Statements of support

Statements of support are acknowledged and welcomed.

Need for greater consistency between the MTS and London Plan/EDS

TfL has worked closely with the GLA and LDA to develop the public draft MTS, replacement London Plan and Economic Development Strategy in parallel, but acknowledges that in some areas, the MTS could be more explicit on the links between the strategies. Therefore, TfL recommends that MTS includes references to Lifetime Neighbourhoods and emerging London Plan priority areas not mentioned in the public draft MTS such as Outer London Development Centres and Strategic Industrial Locations, and the three potential new metropolitan town centres of Stratford, Brent Cross and Woolwich. In addition, it is recommended that further definitions are added to the Glossary.

Need for clearer links between land use and transport planning, in particular more detail on how Opportunity Areas will be supported

As stated above, TfL has worked closely with the GLA and LDA to develop the MTS, replacement London Plan and Economic Development Strategy in parallel. Therefore it is considered that strategic policy is fully aligned. In particular, Policy 23 makes it clear that TfL and partners will support the regeneration of Opportunity and Intensification Areas.

However, as the MTS is a strategic document, it is not appropriate to cover in any detail what transport proposals are required to support growth in any one area such as an Opportunity Area. TfL is currently working with the GLA, LDA, the boroughs and other stakeholders to investigate in greater detail the transport priorities of the growth areas as part of the Sub-regional Transport Plan (SRTP) and Opportunity/Intensification Area Planning Framework (OAPFs/IAPF) processes. This link could be made more explicit in the MTS. TfL recommends that definitions of OAPF/IAPFs be added to the Glossary.

Need to recognise new roads may be required to support regeneration

Proposal 35 [34] in the PD MTS and Policy 6.13 of the draft replacement London Plan sets the criteria for which new road capacity may be considered and one of the criteria is the contribution to London's development/regeneration. Therefore no change is recommended.

Should make it clear that transport infrastructure is key to sustainable growth

Section 4.2 highlights that the key challenge for the MTS is supporting economic development and population growth. Many of the policies and proposals stem from this challenge. The emerging London Plan also makes explicit the importance of delivering the MTS to achieve its vision and objectives. Therefore no change is recommended.

The growth forecasts are not robust and there should be scenarios

The GLA provide growth forecasts for the London Plan and all Mayoral strategies are developed from this, as described in the section on Data in this chapter, and in Chapter 4. Therefore it is not considered appropriate that the MTS should consider the robustness of these forecasts or that there should be scenarios – these are matters for the emerging London Plan. Therefore no changes are recommended.

Growth is not spatially presented to allow an assessment of impact on the road network.

Figures 14 and 15 in the PD MTS show the spatial distribution of population and employment growth and Figures 25 and 26 show highway congestion in 2006 and

2031 with the MTS reference case. Therefore no changes are recommended with regard to this point, but please see Chapter 4 for information on updated data and Figures.

MTS should prioritise growth areas.

Policy 1 in the PD MTS states that London's transport system will be developed in order to accommodate sustainable population and employment growth. Policy 23 supports Opportunity and Intensification Areas. It is considered that this adequately demonstrates the commitment to support growth areas. Therefore no changes are recommended.

Policy 9 should mention road safety.

Policy 9 is a strategic development management policy and is not intended to cover all transport related planning considerations. Policy 19 and Proposal 70 seek to improve road safety generally. Therefore no changes are recommended.

The London Plan, EDS and MTS should have a single house style

This is not a strategic consideration for the MTS, therefore no change is recommended.

Limitations as a result of running the three major consultations together should be considered.

There are clear benefits of developing the MTS, London Plan and EDS together to ensure consistency, as there also benefits in consulting upon the three at the same time, for example so that stakeholders can consider each within the context of the other strategies. Chapter 2 of this report sets out the approach to consultation in more detail. No changes are recommended.

TfL recommendations

Add references to the following key London Plan designated areas/concepts to improve consistency:

Strategic Outer London development centres:

Section 3.1.3

Section 4.2.2.5

Policy 6

Lifetime neighbourhoods:

Section 4.2.2.7

Section 5.13.2

Glossary

Strategic Industrial Locations:

Section 4.2.3.4

Policy 12

Add reference to Sub-regional Transport Plans with regard to identifying transport priorities in Opportunity and Intensification Areas in section 4.5

Add definitions/additions in the Glossary for:

Opportunity Area and Intensification Area Planning Frameworks

The three potential metropolitan town centres identified in the London Plan:

Stratford, Woolwich and Brent Cross

8. Supporting delivery of the London 2012 Olympic and Paralympic Games and its legacy

Section 4.7 of the Public Draft MTS describes the approach to supporting the delivery of the 2012 Olympics and Paralympic Games in London. Policy 26 takes this approach forward.

Analysis of responses

Twenty-one stakeholders commented on issues relevant to this section. These were: Chartered Institute of Environmental Health, Chartered Institution of Highways and Transportation, Community Transport Association, Crown Estate, Department for Transport, Environment Agency, Freight Transport Association, Independent Disability Advisory Group, Living Streets, London Borough of Hackney, London Borough of Newham, London Borough of Sutton, London Chamber of Commerce and Industry, London City Airport, London Thames Gateway Development Corporation (LTGDC), National Joint Utilities Group (NJUG), Olympic Delivery Authority (ODA), Private Hire Board, Trade Union Congress, Transport Salaried Staff Association and University of East London.

Comments on the Games from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

Games

- Suggestion that the MTS should focus on London aspects of the Games
- Opposes the need for an Olympic section in a 20-year strategy
- Concern about the management of the Olympic and Paralympic Games
- Support for the section on the Olympic and Paralympic Games

Legacy

- Concern on the lack of detail on the legacy aspects of the Games, particularly around convergence
- Consideration of improvements to a rail station in the Legacy
- Comment on how the legacy should be delivered

TfL Response

The 2012 Games

TfL accepts that the wording should focus on the London aspects of the Games. Therefore it is recommended that wording of the draft MTS is changed to reflect this. TfL recommends changes to section 4.7 and 'Spotlight on the London 2012 Olympic and Paralympic Games Transport Plan' to focus on London issues relating to the Games.

The Olympic Games is a significant event for London, and it is over 60 years since it was last held in the Capital. It is therefore appropriate that the MTS includes a policy (Policy 26) which refers to the transport aspects of the Games both in terms of preparation and operation and in terms of legacy planning. Transport planning for the event, then, is not just concerned with the four weeks that the Games are in progress, but with ensuring that the benefits of the longer-term legacy to London are maximised.

Issues around managing the Games and relevant transport interventions will be considered within the Olympic Transport Plan, which is being prepared by the Olympic Delivery Authority (ODA). TfL continues to work closely with the ODA on the development of this Plan, and, as set out in Policy 26 in the PD MTS, will be working with them to ensure that the infrastructure is in place and the legacy is delivered, as well as on the day-to-day transport operations. TfL recommends no change.

Legacy

The case for specific improvements to rail stations, while not considered a strategic issue for inclusion in the public draft MTS, will be considered as part of the Transport Legacy work required by the MTS.

It is accepted that greater focus needs to be made on the legacy aspects of the 2012 Games. Therefore TfL recommends that text relating to the principle of Convergence is included in section 4.7 and in Policy 26. It is also recommended that a new strategic outcome indicator, on supporting the delivery of the London 2012 Olympic and Paralympic Games and its legacy be added.

How the transport legacy will be delivered will be covered in transport legacy planning and TfL recommends that the MTS includes a new Proposal 47 to take forward the transport legacy planning.

TfL Recommendations

Changes to section 4.7 and spotlight on the London 2012 Olympic and Paralympic Games Transport Plan to focus on London issues relating to the Games

Recommend inclusion of the principle of Convergence in section 4.7 and in Policy 26

Add a new strategic outcome indicator – the definition of this indicator will be developed by TfL in conjunction with the 5 Olympic Boroughs

Include a new section 5.1.1. on the Legacy and a new Proposal 47 on the Transport Legacy Action Plan and using transport interventions to support convergence

9. National Rail, Crossrail, Thameslink, Overground, DLR and Tramlink

Section 5.2 of the Public Draft MTS describes the Mayor's approach towards National Rail in London, including Crossrail, Thameslink (as part of HLOS1), the DLR and Tramlink.

Analysis of responses

Ninety-one stakeholders commented on issues relevant to this section, these were:

ASLEF, Association for Consultancy and Engineering, Association of British Drivers, Association of International Courier and Express Services, Association of Train Operating Companies, Aviation Environment Federation, Better Bankside, Campaign for Better Transport, Campaign to Protect Rural England, CBI, Chartered Institute of Logistics & Transport UK, Clive Efford MP, Cllr Peter Morgan – Bromley, Community Transport Association, Corporation of London, Department for Transport, East of England Development Agency, First Capital Connect, Friends of Capital Transport Campaign, Heathrow Airport Limited, Hertfordshire County Council, Independent Disability Advisory Group, Institute of Advanced Motorists, Jenny Jones AM, Kent County Council, the London Assembly, London Borough of Barking & Dagenham, London Borough of Bexley, London Borough of Brent, London Borough of Bromley, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Merton, London Borough of Newham, London Borough of Redbridge, London Borough of Richmond upon Thames, London Borough of Southwark, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Civic Forum and Youth Campaign for Better Transport, London Councils, London Cycling Campaign, London Development Agency, London First, London Forum of Amenity and Civic Societies, London Gatwick Airport, London Liberal Democrats, London Thames Gateway Development Corporation, London TravelWatch, National Express East Anglia and c2c, Network Rail, North London Strategic Alliance, Olympic Delivery Authority, Park Royal Partnership, Parliamentary Advisory Council for Transport Safety, RAC Foundation, Railfuture, Richard Tracey Conservative Spokesperson London Assembly, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Royal Free Hampstead NHS Trust, South East England Regional Transport Board, Steve O'Connell AM, South West London Transport Consortium, Tandridge District Council, Thames Gateway London Partnership, The Crown Estate, The South

London Partnership, Transport for All, Transport Planning Society, TSSA, TUC, Valerie Shawcross AM, West London Partnership and Westminster City Council.

The public questionnaire asked which measures would most benefit use of the Rail network, which was answered by 88 per cent of respondents (93 per cent of responses via the web and 84 per cent of paper responses). The measure which was most often selected was “enabling passengers to use Oyster pay as you go across all rail in London” (54 per cent of respondents).

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 7 per cent of respondents made a comment with regard to rail (other), 5 per cent of respondents made a comment with regard to increasing rail capacity, and 5 per cent of respondents made a comment with regard to rail freight. Fewer than two per cent of respondents made a comment about DLR or Tramlink. The issues raised in the public responses were broadly similar to those raised by stakeholders.

In the 24 letter and email responses from businesses, seven made comments in support of Crossrail 1 & 2.

Issues raised

The following is a list of the issues raised:

- Support for more international services on HS1 and that Stratford International is served by international services
- Support for more rail freight proposals
- Support for Domestic High Speed Rail, with several stakeholders requesting more details, especially regarding a potential interchange at Old Oak Common
- There was strong support to deliver Crossrail and consider extensions to Crossrail, after it opens in 2017, as well as a reference be added to the LDA’s Crossrail regeneration work
- A number of stakeholders expressed concern that the High Level Output Specification (HLOS)1 (2009 – 2014) programme (including Thameslink), while committed by Government, may not be delivered in its entirety, noting the importance for London’s economy of completing valuable capacity upgrades to the National Rail network. If the HLOS1 programme is not completed as proposed, it could have a significant impact on HLOS2 (2014/15 – 2019), for which stakeholders requested more prioritisation in the Transport Strategy
- Call for the MTS to reference the Network Rail Route Utilisation Strategy (RUS) process
- Request for reference to potential for new stations to be added

- There were a range of comments relating to possible further expansion of capacity of the National Rail network in London, including a range of mostly supportive comments relating to the committed HLOS1 programme, and a number of comments relating to possible HLOS2 schemes including a request for more details
- A number of stakeholders support a proposal for a new link, commonly known as the “Hall Farm Curve”, to provide direct trains between Chingford and Stratford, plus other rail improvements in this area
- Support for Chelsea-Hackney Line (Crossrail 2) and the review of the scheme, though some calls for specific routes/stations and a more detailed timetable for delivery
- A number of stakeholders support the Mayor and TfL having greater powers over suburban National Rail services in London
- Call for closer working between GLA group and neighbouring regions regarding rail planning
- There was strong support for extension of the Oyster ‘pay as you go’ to National Rail services, with some concerns raised regarding Oyster Extensions Permits
- Range of comments regarding possible improvements to the London Overground network, with strong emphasis on support for electrification of the Gospel Oak to Barking line. Some concern about potential change to third rail ‘DC’ services to Wembley Central and Watford Junction, principally diverting them away from Euston
- Request for more details regarding potential Tramlink extensions
- Request for more details regarding potential DLR extensions, plus more definitive commitment to Dagenham Dock extension in particular

TfL Response

Where overall support has been expressed, comments have been noted.

HS1 and Stratford International

Improving London’s international rail passenger links is set out in section 5.2.2 and Proposal 1, which confirms support for more international services on HS1, and that Stratford International station should be served. TfL recommends no change.

Rail freight

Proposals 2 and 3 set out the potential to develop rail freight in London, with a particular call to support rail routes that relieve London of rail freight that has neither origin or destination in London. Domestic High Speed rail is considered in Proposal 4. However, while more detail about HS2 and the further development of domestic high speed rail was published by the government on 11 March 2010, as part of their response to the HS2 report (in the form of a “Command Paper”), further research is

needed to ensure that Old Oak Common is the optimum location for a potential interchange between HS2 and Crossrail. Chapter 4 of this report sets out more detail on the HS2 report. TfL recommends no change.

Crossrail

Crossrail is integral to delivering the outcomes of the MTS and is strongly supported by Section 5.2.3, which sets out how growth will be accommodated on the National Rail network, beginning with Proposal 5 supporting the delivery of Crossrail and Proposal 6 supporting potential future extensions of Crossrail. It is too early in the development of potential Crossrail extensions for the MTS to support any scheme in detail. The current Crossrail section does not reference the LDA's Crossrail Regeneration Investment Plan, and TfL recommends that this is added. The PD MTS strongly supports the delivery of the HLOS1 programme and Thameslink, through section 5.2.4 and Proposal 7. However, it is also considered that a change to the MTS could help to reinforce the vital need for these projects to be delivered to their original specification, given their positive impact on London's economy.

HLOS1, RUS, new stations

Consideration of the next stage of improving National Rail capacity, beyond that which is committed through HLOS1, is set out in Proposal 8, while Proposals 9 and 11 reference further capacity enhancements beyond HLOS1. However, it is considered that a change to the public draft MTS to reference the Network Rail Route Utilisation Strategy process could help to reinforce the close working relationship between TfL and Network Rail. In addition, TfL recommends the addition of a reference to improve access to rail services by providing additional stations, which was requested by a number of stakeholders.

Hall Farm curve, Chelsea-Hackney Line

It is too early to include more detail about rail capacity schemes beyond HLOS2, which is itself yet to be developed, while a full prioritisation of HLOS2 schemes will not have been completed by TfL London Rail in time to be included in the MTS. However, TfL recommends that more detail is added regarding improving rail access to Stratford as part of a wider West Anglia package, in order to indirectly reference the "Hall Farm Curve", as well as the addition of Great Northern medium-term priorities and Brighton Main Line and West Coast Main Line longer term priorities. Proposal 9 sets out the intention to undertake a review of the Chelsea-Hackney Line, however it is too early to set out more detail about such a potential scheme at this time, and so no change is recommended.

Suburban services, Oyster

Proposals 12 and 13 set out the approach to improving customer standards across the National Rail network in London. TfL recommends a text change to recognise the Mayor's role regarding suburban rail services in London, though referencing more

detailed working with neighbouring regions is outside the scope of the MTS. The roll-out of Oyster across National Rail is now complete, though issues relating to Oyster Extensions Permits and other specific aspects of National Rail integration are considered too detailed for inclusion in the MTS.

London Overground

Proposal 14 sets out the next steps for London Overground, including the potential for future expansion. Decisions about the future of the through services between Watford junction and London Euston (DC lines) will be developed with the DfT, following publication of the HS2 report, so it is not appropriate to make a change at this time.

DLR and Tramlink extensions

Proposal 15 sets out the potential for DLR extensions. However, it is felt that this could be strengthened regarding safeguarding for Dagenham Dock extension in order to align with London Plan, as well as investigation of the feasibility of network expansion of the DLR network.

Proposal 16 sets out the potential for Tramlink extensions. However, more details cannot be provided because any schemes themselves are still at an early stage of development through the Sub-regional Transport Plans.

TfL Recommendations

Insert additional text in section 5.2.3 to reference the LDA's Crossrail Regeneration Investment Panel

Insert additional text in section 5.2.4 to ensure that Thameslink and the remainder of the committed HLOS1 programme are delivered as planned

Insert additional text in section 5.2.4 to confirm that TfL will continue to work closely with Network Rail regarding their Route Utilisation Strategies, inform franchise specifications, and inform the HLOS process

Insert additional text to section 5.2.4 to reference the potential for new stations, as part of improving access to rail services, with them to be taken forward through the Opportunity Area Planning Framework and Sub regional Transport Plan process

Insert additional text to Proposal 8 to include a reference to an overall package for West Anglia services and Great Northern services, as part of the highest priorities for rail capacity improvements in the medium term, with potential longer term solutions required on a number of lines, such as the Brighton Main Line and the potential from capacity released from HS2 on the West Coast Main Line

Insert text to section 5.2.4 to clarify that the influencing of the franchise process, could be better achieved by the Mayor having greater powers over suburban

passenger services

Insert additional text in Proposal 13 to clarify that the roll-out of improved customer standards across the National Rail network in London could be better achieved if the Mayor had more control over suburban rail services

Insert additional text in Proposal 15 to support the safeguarding of the Dagenham Dock extension, as well as that further feasibility work will be investigated for other potential DLR extensions

Update text relating to potential domestic high speed rail proposals, based on HS2 Command Report, therefore being up to date

Update text to clarify that the Chelsea-Hackney Line review includes the benefits from helping with onward dispersal from passengers at central London termini

10. London Underground

Section 5.3 of the Public Draft MTS describes how the London Underground network will continue to be improved over the life of the MTS. Policies 3, 4, 9, 10, 13, 18, 20, 21, 22, 23, 24 and 25 and Proposals 17 to 22 also relate to London Underground.

Analysis of Response

Fifty-four stakeholders commented on issues relevant to this section. These were:

Age Concern London, ASLEF, Association for Consultancy and Engineering, Association of Train Operating Companies, Campaign for Better Transport, Confederation of British Industries, Chartered Institute of Environmental Health, Corporation of London, Department for Transport, Friends of Capital Transport Campaign, Institute of Advanced Motorists, Kent County Council, London Assembly, London Borough of Bexley, London Borough of Camden, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hammersmith & Fulham, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Merton, London Borough of Newham, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Civic Forum and Youth Campaign for Better Transport, London Councils, London First, London Forum of Amenity and Civic Societies, London Liberal Democrats, London TravelWatch, North London Strategic Alliance, Park Royal Partnership, RAC Foundation, Railfuture, Richard Tracey Conservative Spokesperson London Assembly, Royal Borough of Kensington & Chelsea, Royal Free Hampstead NHS Trust, Steve O'Connell AM, South and West London Transport Conference, Crown Estate, Transport for All, Transport Salaried Staffs' Association (TSSA), TUC, Unite the Union, Valerie Shawcross AM and Westminster City Council.

The public questionnaire included a question about which measures would most improve the Tube network, which was answered by 91 per cent of respondents (96 per cent of responses via the web and 88 per cent of paper responses). The question on 'the Tube' attracted the highest proportion of answers within Question 2. The measure which was most often selected was "delivering a more reliable service" (49 per cent of respondents). Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 11 per cent commented on the Tube, and five per cent commented on providing a service which was more reliable or operated for longer hours. Other issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues Raised

The following is a list of the issues raised:

- The need for litter bins in Tube stations
- The possibility of publishing lift and escalator repair times
- The importance of technical innovation on London Underground
- The need for co-ordination of line closures with Network Rail
- The fare zone classification of stations
- The need for public toilets in Tube stations
- The lack of seating on the new Sub-Surface (S-Stock) trains
- The need for a no strike deal with the trade unions
- The prospect of a Central line diversion to Uxbridge
- A lack of ambition in the strategy related to congestion on the network
- The importance of maintaining ticket office facilities
- The importance of maintaining existing infrastructure
- The need for air conditioning on the Underground
- The need for commitment to a Northern line extension to Battersea
- Suggestions for the route of a southbound Bakerloo line extension
- Suggestions for various other line extensions
- The importance of continuing with the step-free access programme
- The high costs of the Public Private Partnership (PPP) contracts and the need for clarity on the funding and timescales of the Line Upgrades
- The need for detailed capacity enhancement plans at stations
- Concern about crowding on the network

TfL Response

The need for litter bins in Tube stations

Litter bins are provided throughout many Tube stations, and at ticket hall level at some higher security stations. London Underground conducted a trial of below-ground level litter bins at King's Cross in 2009, and found that they impeded passenger flows, presented a security risk and did not have a significant impact on litter levels. There are therefore no plans to increase the provision of litter bins at Tube stations, and no changes are recommended.

Publishing lift and escalator repair times

One stakeholder requested that London Underground publish details of its target response times for lift and escalator repairs. TfL currently publishes a variety of

performance indicators in its Business Plan, including a percentage of assets in good repair and passenger hours lost due to infrastructure problems, which include lift and escalator performance. Therefore, no change is recommended.

The importance of technical innovation on London Underground

TfL accepts the importance of technical innovation to improving the Tube network, and many innovative features are being introduced as part of the ongoing programme of line upgrades. It is recommended that further references to these innovations be included in section 5.3.2.

The need for co-ordination of line closures with Network Rail

TfL plans line closures carefully, and co-ordinates its closures with Network Rail through regular meetings. TfL does not recommend a change in this area.

The fare zone classification of stations

The zone classification of individual stations is not a strategic issue and not suitable for inclusion in the MTS, so no change is recommended.

The need for public toilets in Tube stations

Because of space restrictions it is not normally possible to install public toilets at existing Tube stations. However, TfL will provide public toilets wherever possible at new stations and at stations undergoing significant reconstruction. TfL does not recommend a change with regard to this point.

The lack of seating on the new Sub Surface (S-Stock) trains

The new S-Stock trains were designed to increase capacity and shorten journey times. On the Metropolitan line this has resulted in a reduction in the number of seats per train, however this will be offset by an increase in service frequency and a significant increase in total capacity. The S-Stock design has now been finalised and so TfL does not recommend a change.

The need for a no-strike deal with the trade unions

Any possibility of a no-strike deal with unions would be reviewed during regular discussions with union representatives, but this does not constitute a strategic issue and TfL does not recommend that this issue is discussed in the MTS.

The prospect of a Central line diversion to Uxbridge

TfL has considered the possibility of a Central Line diversion to Uxbridge. Initial analysis showed that any benefits of a diversion would be outweighed by the significant cost involved and the disbenefits to customers using the Metropolitan and Piccadilly lines. There are therefore no plans to progress plans for a diversion to Uxbridge at this time, and TfL does not recommend a change to the strategy.

A lack of ambition in the strategy related to congestion on the Tube network

Some stakeholders suggested that the proposals suggested in the PD MTS did not go far enough in mitigating congestion on the Tube network, or propose enough longer term schemes. However, the PD MTS does include proposals to consider longer term enhancements and extensions within Proposals 8, 9 and 22; and TfL does not recommend a change to the strategy.

The importance of maintaining ticket office facilities

Stakeholders commented on the importance of providing ticket office facilities and travel information at stations. TfL recognises the importance of customer care, and Proposal 21 of the PD MTS details how TfL will continue to deliver a high standard of customer care on the Underground network. TfL therefore does not recommend a change to the strategy.

The importance of maintaining existing infrastructure

TfL recognises the importance of maintaining existing assets as well as providing new infrastructure. Section 5.3.2 of the PD MTS outlines how the current programme of upgrades will renew and maintain existing assets, and so TfL does not recommend a change to the strategy.

The need for air conditioning on the Underground

Stakeholders expressed support for the introduction of air conditioning on the sub surface lines, and many asked for air conditioning to be extended to the deep Tube lines. TfL considers that section 5.3.5 and Proposal 20 of the PD MTS discuss this issue in sufficient detail and so does not recommend a change to the strategy.

The need for commitment to a Northern line extension to Battersea

Proposal 22 sets out the Mayor's support for an extension to the Northern line to Battersea. Stakeholders requested more details on the route of the extension and how it would be funded. Further details on the extension will be provided in the relevant Sub-regional Transport Plan and details of funding will be included in future Business Plans; therefore TfL does not recommend a change.

Suggestions for the route of a southbound Bakerloo line extension

Various suggestions were also made for the route of a southbound extension to the Bakerloo line. Proposal 22 includes a commitment to review the potential for such an extension and this would include an assessment of the optimal route for the line. Further information will also be provided in the relevant Sub-regional Transport Plan, so TfL does not recommend a change.

Suggestions for various other line extensions

Some stakeholders also suggested the Tube could be extended to a variety of other locations including Bexley, Leaside, Eltham and Hackney Wick. Where transport improvements in these areas are being considered, this will be discussed in the relevant Sub-regional Transport Plan. In the longer term, TfL will continue to explore opportunities for extensions to the Underground and rail network, as described in Proposals 8, 9 and 22. TfL considers these proposals to be sufficient in this regard and so does not recommend a change to the public draft MTS.

The importance of continuing with the step-free access programme

TfL recognises the importance of providing step free access at Tube stations. A significant number of stakeholders commented on this issue and TfL's commitment to continue to enhance step free access as part of the continuing Tube upgrade programme is set out in section 5.9 of the MTS. TfL does not recommend changes relating to this issue in the London Underground section.

The high costs of the Public Private Partnership (PPP) contracts and the need for clarity on the funding and timescales of the Line Upgrades

The implications for the current issues concerning the PPP contracts and details of how the line upgrades are being funded is dealt with in the TfL Business Plan process and a Business Plan report is published annually. TfL does not recommend changes to the strategy in this area, however it should be noted that a new sub-section has been recommended for inclusion in Chapter 8 on Tube funding (see section in this report on 'Funding the Strategy').

The need for detailed capacity enhancement plans at stations

Stakeholders expressed concerns over the lack of detailed capacity enhancement plans for various underground stations, and in particular those stations that might experience increased level of usage as a result of the line upgrades and other transport improvements. Proposal 19 of the PD MTS explains how a prioritised programme of station enhancements will be developed and implemented. More detailed plans at a station by station level would be too specific for the MTS, so TfL does not recommend a change to the strategy.

Concern about crowding on the network

Respondents expressed concern over crowding on the existing network and especially on the District line. The planned programme of line upgrades will significantly increase capacity across the network and should reduce crowding. TfL considers that the proposed upgrades are described in section 5.3.2 of the PD MTS and so does not recommend a change.

TfL Recommendations

Amend section 5.3.2 on the renewal and repair of the network to include more references to technical innovation

11. London's Bus Network

Section 5.4 of the Public Draft MTS describes the approach to manage and develop the bus network in line with Policy 3,4, 5, 6, 7, 8, 10, 13, 21, 22, 23 and 24.

Proposals 23-25 take this approach forward.

Analysis of responses

Seventy-three stakeholders commented on issues relevant to this section. These were: Age Concern London, Association of British Drivers, ATOC, Better Bankside, Campaign for Better Transport, Campaign to Protect Rural England, Canary Wharf Group Limited, CBI, Corporation of London, Friends of Capital Transport Campaign, Guide Dogs for the Blind Association, Hertfordshire County Council, IDAG, Inclusion London, Institute of Advanced Motorists (IAM), Institute of Civil Engineers (ICE), Jenny Jones AM, Jonathan Glantz Ward Councillor Westminster City Council, London Assembly, London Borough of Barking & Dagenham, London Borough of Barnet, London Borough of Bexley, London Borough of Brent, London Borough of Bromley, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hackney, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Merton, London Borough of Newham, London Borough of Richmond upon Thames, London Borough of Southwark, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum and Youth Campaign for Better Transport, London Councils, London First, London Forum of Amenity and Civic Societies, London Liberal Democrats, London Thames Gateway Development Corporation (LTGDC), London TravelWatch, London Visual Impairment Forum, North London Strategic Alliance, North West Londons Hospitals NHS Trust, Park Royal Partnership (PRP), RAC Foundation, Railfuture, RNIB, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, SWELTRAC, Tandridge District Council, The Chartered Institution of Highways and Transportation, The Crown Estate, Transport for All, Transport Planning Society, TSSA, TUC, Unite, Valerie Shawcross AM, West London Partnership, and Westminster City Council.

The public questionnaire included a question about which measures would most improve bus service in London, which was answered by 83 per cent of respondents, (92 per cent of responses via the web and 77 per cent of paper responses). The measure which was most often selected was "providing more information at bus stops" (42 per cent of respondents).

In addition, Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of

those who made a comment here, 16 per cent of respondents made a comment with regard to the bus service and route issues. In the responses by letter and email, 14 of 55 organisations made a comment on this issue, including the comment that there was a need for a strategic review of the bus network. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

- Call for stronger policies and proposals to improve bus links and services in outer London, including orbital links
- Request for a proposal on express bus services
- Need for MTS to set out the strategic priorities to guide a bus review
- Need for a strategic review of the bus network
- Suggestion to highlight the role of bus priority and calls for less or more bus priority
- Concerns over the reduction of bus services
- Concerns over bus fare increase
- Suggestion to review bus ticketing including the introduction of a time-based ticket
- Concerns that LIPs funding guidance does not encourage bus priority
- Call for a more efficient bus network
- Suggestions to enhance the management of the bus network
- Comments on specific routes or locations
- Opposition to/concern regarding the introduction of the New Bus for London regarding costs, accessibility, safety
- Concerns about the cost and consequences of the removal of 'bendy buses'
- Suggestion for improving bus travel information
- General comments and support, and positive comments on bus travel information and the use of hybrid buses

TfL Response

Outer London and express buses

The introduction of express bus services will be considered on a case-by-case basis in discussion with boroughs and others through the Sub-regional Transport Plan process, or via a strategic bus review. However, TfL considers that a change to the PD MTS could help emphasise the importance of the bus network in outer London and recommends that appropriate text is added to MTS.

Strategic bus review, strategic priorities and efficiency of the bus network

With regard to requests for a strategic review of buses, Proposal 23 states that the development of the bus network will be kept under regular review. However, TfL recommends a modification to Proposal 23, to state that the regular review will include reviews of the strategic priorities underlying the process of how the bus network is planned. This review will take place approximately every five years. An efficient bus network will help to meet the challenge of delivering an efficient and effective transport system for people and goods.

Bus service levels and fares

The TfL Business Plan outlines performance targets for bus kilometres until 2017/18 and these are reviewed on an annual basis. TfL business planning decisions are made in alignment with the MTS policies and proposals, including the development of outer London town centres while increasing the efficiency of the bus network.

The TfL Business Plan outlines how fares will rise from January 2011 and acknowledges that decisions will be made on an annual basis. TfL business planning decisions are made in alignment with the MTS policies and proposals to ensure that fares provide an appropriate level of financial contribution towards the cost of providing public transport services while ensuring that concessionary fares will be most effective at helping those in most need of them. TfL recommends no change.

Bus ticketing

Specific change to the bus ticketing system will be considered in line with Proposals 23 and 24 of the MTS. TfL recommends no change.

LIP guidance

Boroughs' contribution to the delivery of the MTS, including the efficiency of the bus network, will be monitored but there is no specific requirement in revised LIPs guidance as to how the boroughs should implement the MTS. TfL recommends no change.

Efficiency of the bus network

One of the challenges the MTS addresses is delivering an efficient and effective transport system for people and goods. This includes delivering an efficient bus network, and therefore TfL recommends no further changes.

Changes to specific routes and location

Changes to the way the bus network is managed will be considered during any strategic or regular bus reviews. Changes to specific bus routes or bus service in local areas will be considered as part as any strategic or regular bus reviews and, if appropriate, through the Sub-regional Transport Plan process. TfL recommends no change.

New Bus for London

The introduction of a new bus for London is one of Mayor's election commitments. TfL will consult a broad range of user groups during its development and will make refinements in the light of their views. TfL recommends no change.

Removal of bendy buses

Removing the 'bendy buses' is one of the Mayor's election commitments, and this will be done in a cost-effective way. TfL recommends no change.

Supportive comments

TfL welcomes supportive comments on the policies and proposals on the bus network including specific supportive comments on proposals to develop the use of hybrid buses and to improve bus travel information.

TfL Recommendations

Amend section 5.4.1 to underline the importance of the bus network in outer London

Amend Proposal 23 to include a reference to a strategic bus review

Amend section 5.4.3 to highlight the benefits of bus priority

12. Taxis, private hire and community transport

Sections 5.5.1-2 and 5.5.4 of the Public Draft MTS describes the approach to taxis, private hire vehicles (PHVs) and community transport. Proposals 26, 27 and 29 take this approach forward in the draft MTS.

Analysis of responses

Twenty-five stakeholders commented on issues relevant to this section. These were: Better Bankside, Campaign to Protect Rural England, Chartered Institute of Environmental Health (CIEH), Community Transport Association, Corporation of London, Federation of Small Businesses, TfL's Independent Disability Advisory Group (IDAG), Licensed Private Hire Car Association (LPHCA), London Borough of Camden, London Borough of Croydon, London Borough of Havering, London Borough of Hillingdon, London Borough of Lambeth, London Borough of Newham, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Liberal Democrats, London TravelWatch, London Visual Impairment Forum, Private Hire Board, RNIB, Royal Borough of Kensington & Chelsea and Westminster City Council.

Comments on taxis, private hire vehicles and community transport from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

Support for approach

- Comments of support for acknowledging the contribution of taxis, private hire vehicles (PHVs) and community transport

Driver behaviour

- Need to improve taxi/PHV driver attitudes and behaviour
- Ensuring that licensed PHV drivers do not operate independently from licensed operators

Taxi supply

- Support for a strategic review of taxi provision and location of services

PHV restrictions

- Restrictions on PHVs in bus lanes
- Need to help alleviate PHV pick-up/ set down issues

Environmental

- Comments regarding the contribution (low emissions) taxis and PHVs can make to improving air quality emissions

Community transport

- The provision of door to door services needs to be maintained
- Community transport should be recognised in LIPs

Editorial

- Comment that individual community transport organisations should be mentioned

TfL response:

Comments of support are noted and welcomed.

Driver behaviour

Proposal 26 in the PD MTS contains measures to improve driver behaviour through licensing procedures, so no change is recommended.

Taxi supply

Proposal 26 details a number of measures to support improvements to the taxi offer in London. This includes provision of parking and waiting facilities, including rest facilities. Therefore, no change is recommended

PHV restrictions

Paragraph text in section 5.5.2 indicates that there may be opportunities to review restrictions governing PHVs over the duration of the Strategy. PHVs are allowed to make use of bus lanes to pick up and set down pre-booked passengers. TfL does not recommend a change.

Proposal 26 promotes a continuous process of improvement to provide a modern and cost effective licensing service for taxis and PHVs. Proposal 27 also outlines opportunities to review the licences industry and reappraise restrictions, in addition to the 'Safer Travel at Night' scheme. No change is recommended.

Environmental

Proposals 26 and 108 [107] highlight the contribution of taxis and PHVs could make to improving air quality and reducing London's greenhouse gas emissions through the development of low carbon and low pollutant vehicles. However, it is recommended that the text in section 5.5.1 should be amended to further clarify this position.

Community transport

Door- to-door services, including Dial-a-Ride are considered in the section on Transport Opportunities for All in this report.

Local Implementation Plans are addressed by Policy 29. Consultation on the draft revised LIPs guidance is now closed, and the final version will be issued following publication of the MTS. No change is recommended.

Editorial

Given the strategic role of MTS, referencing individual community transport organisations would not be appropriate.

TfL Recommendations

- Amend section 5.5.1 to highlight the potential contribution of improving taxi and PHV emissions in improving London's air quality

13. Coaches

Section 5.5.3 of the Public Draft MTS describes the Mayor's approach towards coach travel in London, however there are also interactions with policies and proposals relating to parking and loading; orbital connectivity in outer London, the bus network and interchanges (see separate sections in this report).

Analysis of responses

Fourteen stakeholders commented on issues relevant to this section, these were:

Confederation of Passenger Transport, London Borough of Havering; Lambeth; London Borough of Newham and London Borough of Wandsworth; London Chamber of Commerce and Industry; London First; London Forum of Amenity and Civic Societies; London TravelWatch; Olympic Delivery Authority (ODA); RAC Foundation; Royal Borough of Kensington & Chelsea; Royal Parks and Society of Motor Manufacturers and Traders Ltd (SMMT).

Comments on coaches from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

General support

- Support for approach, in particular highlighting that it is often an overlooked mode, so its inclusion in the MTS is welcome

Infrastructure, pick up/set down and parking facilities

- New dedicated coach infrastructure needed e.g. new coach hubs, improved pick up/set down facilities, particularly in central London and other busy areas
- Lack of dedicated coach facilities puts passengers in danger when boarding or alighting
- More details needed regarding potential for dispersal of coach activity from Victoria Coach Station

Olympic Legacy

- Need for consultation on any potential coach hubs at Stratford as part of the Olympic Legacy

Editorial

- MTS does not do enough to highlight the benefits coach transport offers to the economy and environment

TfL Response

General support

Support has been noted.

Infrastructure, pick up/set down and parking facilities

Measures to improve coach parking and, in the longer term, the provision of alternative facilities are contained within Proposal 28 of the PD MTS.

Building upon Proposal 28 [28], further details regarding the provision of coach facilities, particularly those in central London, will be provided in the London Coach Strategy to be produced following publication of the MTS. The issue will also be considered as part of the Central London Sub-regional Transport Plan process. Therefore, TfL does not recommend a change.

Safety concerns are addressed in Proposal 63. Measures contained in Proposals 28 and 124 [123] may also help to improve passenger safety, for example when boarding and alighting. Therefore, TfL does not recommend a change.

Olympic legacy

A more comprehensive section regarding the legacy phase of the Olympics would be beneficial for the MTS and would commit partners to engaging with each other on transport issues such as the potential provision of coach facilities at Stratford. This is considered in the chapter on 'Olympic and Paralympic Games legacy' in this report.

Editorial

The wider benefits provided by coach transport are set out in section 5.5.3. Therefore, TfL does not recommend a change.

TfL Recommendations

Include a new section regarding the Olympic and Paralympic Games Legacy with a proposal committing partners to a Transport Legacy Action Plan and Monitoring programme (see also section on Olympic and Paralympic Games Legacy in this report)

14. Managing the Road Network

Section 5.6 of the Public Draft MTS describes how the strategy will maximise the efficient use of London's road network. Proposals 30 to 35 and Policies 5 to 8, 10, 12, 13 and 24 also relate to managing the road network.

Analysis of Response

Eighty-nine stakeholders commented on issues relevant to this section. These were: Association of British Drivers, Association for Consultancy and Engineering, Association of International Courier and Express Services, Automobile Association, Better Bankside, British Motorcyclists Federation, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Logistics & Transport, Confederation of British Industries, Confederation of Passenger Transport, Corporation of London, Crown Estate, CTC, Department for Transport, Energy Saving Trust, English Heritage, Federation of Small Businesses, Friends of Capital Transport Campaign, Friends of the Earth, Hertfordshire County Council, Highways Agency, Inclusion London, Independent Disability Advisory Group, Jenny Jones AM, Licensed Private Hire Car Association, Living Streets, London Assembly, London Borough of Barking & Dagenham, London Borough of Barnet, London Borough of Brent, London Borough of Bromley, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Merton, London Borough of Newham, London Borough of Redbridge, London Borough of Richmond upon Thames, London Borough of Southwark, London borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Councils, London Cycling Campaign, London First, London Forum of Amenity and Civic Societies, London Liberal Democrats, London Thames Gateway Development Corporation, London TravelWatch, London Visual Impairment Forum, National Joint Utilities Group, NHS Lambeth, North London Strategic Alliance, Parliamentary Advisory Council for Transport Safety, Private Hire Board, RAC Foundation, Ramblers, Richard Tracey Conservative Spokesperson London Assembly Royal National Institute of Blind People, Roadpeace, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Society of Motor Manufacturers and Traders Ltd, South and West London Transport Conference, South East England Regional Transport Board, South London Partnership, Sustrans, Trade Union Congress, Transport for All, Transport Planning Society, Transport Salaried Staffs' Association (TSSA), Unite the Union, Valerie Shawcross AM, West London Partnership and Westminster City Council.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, seven per cent made a comment about making changes

to how different road users use the road or on road space allocation. Two per cent made a comment on smoothing traffic flow. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

- Questions regarding the meaning of smoothing traffic flow
- Concern that smoother traffic flows could induce further traffic and have a negligible effect on congestion growth
- Concern over the re-timing of traffic lights and pedestrian countdown
- Increasing capacity of the road network through road building
- Suggestions for improving responses to incidents on the road network
- Criticism of the management of roadworks
- Criticism of the lack of a road user hierarchy in the strategy
- Suggestions for measures relating to motorcyclists

TfL Response

Questions regarding the meaning of smoothing traffic flow

Since the publication of the Public Draft MTS TfL has continued to engage with stakeholders to develop a smoother traffic flow plan². This means greater transparency and information is now available to be included in the strategy. Section 5.6.3 [5.6.2] and 5.6.4 [5.6.3] describe the core components of smoothing traffic flow and Proposals 30 to 35 set out the measures to smooth traffic flow. However, TfL recommends that some further text is added to the section to clarify the six core principles of the smoothing traffic flow agenda.

Concern that smoother traffic flows could induce further traffic and have a negligible effect on congestion growth (average vehicle delay)

Population and employment induced congestion growth (average vehicle delay) is discussed in section 5.6.3 [5.6.2]. Smoothing traffic flow is not exclusively designed to increase capacity, nor is it a way of prioritising motor vehicles over other road users. The efficient operation of the network is focussed on the most efficient use of capacity at junctions and how this is allocated. The efficient management of the road network can increase the predictability of journeys. The smoothing traffic flow interventions vary on a case-by-case basis, as is described in these sections. Furthermore the PD MTS contains measures to increase walking and cycling journeys and increase public transport capacity. However, TfL recommends the addition of a new sub-section on population and employment-induced congestion

² <http://www.tfl.gov.uk/assets/downloads/corporate/STF-Discussion-Paper-261109.pdf>

growth (new section 5.6.9 'Outcomes' in MTS) and a new figure to show how congestion (average vehicle delay) could be mitigated (new Figure 42 in MTS).

Concern over the re-timing of traffic lights and pedestrian countdown

Any change to the operation of traffic signals, including any re-timing, is planned and carried out in accordance with TfL standards that take into account the safety of pedestrians and all other road users. The level of detail in traffic signal policy makes it more appropriate to include these details in a modal action plan, than in an overarching strategy that has a 20-year timeframe. The timing of signals with countdown devices will also follow these standards. The introduction of pedestrian countdown at traffic signals, which TfL is currently trialling, will provide more information to pedestrians so that they can cross the road with more certainty during the blackout phase (see Proposal 30). TfL recommends no change.

Increasing capacity of the road network through road building

Some respondents raised concern regarding increasing capacity through road building. The strategy describes that the main approach to managing the road network in London is to employ the most effective solutions to get the most out of existing capacity. Proposal 35 [34] sets out the criteria by which new road schemes will be assessed and taken forward only if they display an overall net benefit against relevant criteria. TfL recommends no change.

Suggestions for improving responses to incidents on the road network

TfL accepts that the reaction of highway authorities and other agencies to unplanned incidents plays a key role in maintaining journey time reliability. The management of incidents on the roads by the police is one such area, and section 5.6.6 [5.6.4] and Proposal 33 [32] sets out how this will be addressed. TfL recommends no change.

Criticism of the management of roadworks

The road works permit scheme has been well received and the Code of Conduct on road works has strengthened co-operation between TfL and the major utility companies. In the future more incentivisation will be needed to ensure road works take as little time as possible, at critical points on the network lane rental charging could be used, as set out in Proposal 32 [31], and no change is recommended.

Criticism of the lack of a road user hierarchy in the strategy

It is not appropriate for a 'one size fits all' hierarchy to be applied to London as all road users are equal and the usage characteristics of streets varies widely. The strategy presents an approach where the management of the road network by all relevant highways authorities takes into account the needs of all road users (section 5.6.1). TfL recommends no change.

Suggestions for measures relating to motorcyclists

Section 5.6.1 and Proposal 30 include a trial of motorcycles and scooters to use TLRN bus lanes for a limited period to consider the extent to which this facilitates more reliable journeys; no change is recommended.

TfL Recommendations

Amend section 5.6.2 to further describe the six core components of the smoothing traffic flow agenda; add new text on population and employment induced congestion growth (new section 5.6.9 'Outcomes' in MTS) and a new chart (new Figure 42 in the MTS) that illustrates how congestion (average vehicle delay) will be mitigated

15. The Blue Ribbon Network

Section 5.7 of the Public Draft MTS describes the Mayor's approach towards development of the Blue Ribbon Network (BRN) of rivers and canals for passenger and freight traffic.

Analysis of responses

Twenty-nine stakeholders commented on issues relevant to this section, these were:

Association for Consultancy and Engineering (ACE), Better Bankside, British Waterways, Chartered Institute of Environmental Health (CIEH), Corporation of London, Environment Agency, Friends of Capital Transport Campaign, Hertfordshire County Council, TfL Independent Disability Advisory Group (IDAG), London Borough of Barking & Dagenham, London Borough of Greenwich, London Borough of Havering, London Borough of Hillingdon London Borough of Newham, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Waltham Forest, London Borough of Wandsworth, London Chamber of Commerce and Industry, London City Airport, London Civic Forum, London First, London Forum of Amenity and Civic Societies, London TravelWatch, Port of London Authority, Royal Borough of Kensington & Chelsea, SWELTRAC, Transport for All and TSSA.

The public questionnaire included a question about which measures would most benefit the Thames in London, which was answered by 73 per cent of respondents (82 per cent of responses via the web and 66 per cent of paper responses). The measure which was most often selected was "introducing Oyster on passenger services" (51 per cent of respondents).

Respondents were also invited to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 6 per cent of respondents made a further comment classified as "Other Thames/waterways/River Crossing". The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

Support for expansion of river services

- Widespread support for approach to BRN
- Local stakeholders claim there is potential to further develop the canal network for freight and passenger services
- Suggestions as to how to further use could be made of the BRN for passengers and freight
- Some stakeholders claim there is a need for greater pier capacity

Freight and Land use considerations

- Need to safeguard existing wharves and/or revive derelict facilities
- Should not prejudice other development (e.g. in Thames Gateway regeneration areas) in neighbouring areas or increase local highway traffic

Accessibility, inclusion and integration

- Physical accessibility of piers, towpaths and vessels needs more consideration

Fares and funding

- Complaints that fare levels on river services are prohibitively high
- Questions over the commercial viability and subsidy required to support passenger services
- Support for policies especially for Oyster roll-out on Thames Clippers, and calls for more integration (of passenger information, for example)

Environmental concerns

- Important to preserve the river environment for nature, walkers, cyclists
- Concerns that air quality could deteriorate due to increased river traffic
- Concerns that riparian properties could suffer from increased noise pollution due to increased river traffic

Regulation

- Suggestions to change the regulatory framework of the BRN
- Suggestions to review speed limits (for example in the Pool of London or central London)

Other

- Editorial points raised (factual corrections)

TfL Response

Support for expansion of river services

Supporting statements are noted and welcomed.

TfL considers that measures to develop the BRN to encourage more passenger and freight traffic are set out by Proposals 36 and 37. However, TfL recommends that changes be made to reinforce existing and future proposals to develop the network further, for example emphasising the role canals could play.

Freight and Land use considerations

TfL considers that measures to develop the BRN to encourage modal shift of freight are outlined in Proposals 37 - 38 and further illustrated by text in section 5.7.5.

The draft replacement London Plan (principally Policy 7.26) safeguards protected wharves. It also highlights the attributes which make a wharf suitable for safeguarding, including road/rail access, relationship with surrounding land uses (contextual factors) and impact on improving the sustainability of freight distribution.

The relevant Sub-regional Transport Plans (specifically for East) and Opportunity Area/Intensification Area Planning Frameworks will also consider scope for mode shift of freight to water and respective land use issues. TfL recommends no change.

Accessibility, inclusion and integration

Policies 3 and 17 aim to improve pedestrian accessibility of the BRN, and Policy 21 aims to improve the physical accessibility of the transport system in general. TfL recommends that Proposal 36 be modified in order to reinforce the intention to improve the integration of the BRN with other transport modes. Similarly, changes to the text in section 5.7.4 are recommended to highlight opportunities to improve pedestrian and cycle access to the BRN.

Improved integration between modes is outlined in section 5.1 and the importance of high quality interchanges and improved information is reinforced by Proposal 45. In addition to the changes to Proposal 36 recommended above, TfL recommends that the text within section 5.7.2 should be updated to emphasise ongoing work to integrate ticketing.

Fares and funding

TfL notes that there is concern about the financial viability (due to levels of subsidy) of any expansion of passenger services on the BRN.

Policies 30 and 31 aim to maximise efficiencies, fund services at appropriate levels and seek value for money. No change is recommended with regard to these comments.

Environmental concerns

Proposal 90 [89] includes measures to improve the quality and diversity of London's natural environment. TfL recommends that paragraph text and proposal wording should be updated to emphasise the importance of a good quality natural environment, including towpaths. Additionally, TfL considers that the environmental remit of the River Concordat should also be highlighted, as well as text explaining the need to be sensitive to potential impacts of services on smaller rivers and canals.

Regulation

Governance and river regulation is an issue for discussion and resolution through the River Concordat, however, TfL recommends that this issue should be highlighted in the text.

Other

TfL considers that a number of factual updates and clarifications should be made.

TfL Recommendations

Update text in sections 5.7.2 and 5.7.3 to elaborate further how the River Concordat is working to develop the BRN, by improving facilities for passenger services; integration (information and ticketing) and reducing environmental impacts

In section 5.7.3 provide further information on (optimisation of) pier capacity. Add a paragraph highlighting where there is potential to develop passenger services. Insert new paragraph in section 5.7.3 highlighting the potential to change river traffic management facilities

Insert new paragraph in section 5.7.4 to highlight the potential for increasing passenger and freight traffic where applicable on canals (e.g. Grand Union) and other smaller waterways

Update text in section 5.7.5 to highlight that waterborne freight could help alleviate impacts of road congestion

Insert new paragraph to highlight the potential opportunities to improve access to the BRN (including towpaths) and change Proposal 36 to highlight improved integration with the public transport network

Insert new text in section 5.7.4 to highlight the need for a better quality towpath environment

Highlight the environmental remit of the River Concordat in section 5.7.2 and include text in section 5.7.4 explaining the need to consider potential environmental impact of more services on smaller rivers and canals

Highlight the potential implications new river traffic management facilities for the regulatory framework of the river

Make factual updates in sections 5.7.2 and 5.7.4

16. River Crossings

Section 5.8 of the Public Draft MTS describes the Mayor's approach to new River Crossings, principally east of Tower Bridge across the Thames. Proposal 39 takes this approach forward.

Analysis of responses

Forty-two stakeholders commented on issues relevant to this section, these were:

ASLEF, Association for Consultancy and Engineering (ACE), Campaign for Better Transport, Campaign to Protect Rural England, CBI, Chartered Institute of Environmental Health (CIEH), Clive Efford MP, CTC, English Heritage, Friends of the Earth, TfL Independent Disability Advisory Group (IDAG), Institute of Civil Engineers (ICE), London Borough of Barking & Dagenham, London Borough of Bexley, London Borough of Greenwich, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Havering, London Borough of Hounslow, London Borough of Lewisham, London Borough of Newham, London Borough of Redbridge, London Borough of Wandsworth, London Chamber of Commerce and Industry, London City Airport, London Civic Forum, London Cycling Campaign, London First, London Liberal Democrats, London Thames Gateway Development Corporation (LTGDC), London TravelWatch, London Visual Impairment Forum, Port of London Authority, RAC Foundation, Royal Borough of Kensington & Chelsea, Sustrans, SWELTRAC, Thames Gateway London Partnership, The Chartered Institution of Highways and Transportation, TSSA, TUC, and Valerie Shawcross AM.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 6 per cent of respondents made a comment with regard to other Thames/waterways/river crossings. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

General support for MTS Proposal 39

- Support for a new package of measures to improve accessibility across the Thames in east London

Support for new or improved road crossings, improved resilience and enhanced ferry services

- Support for the principle of new vehicular crossings to permit cross-river transit of cars and freight vehicles in the interests of resilience, and improving local economic performance

- Some support for a new crossing at Silvertown to improve connectivity and resilience
- Some opposition to a fixed Thames crossing at Silvertown as it would offer less capacity than other fixed link options and the potential to generate road traffic on the surrounding highway networks
- Disappointment regarding the cancellation of previous schemes such as the Thames Gateway Bridge
- Support for proposals to reduce congestion at the Dartford Crossings whilst opposing charges for the crossing
- Support for measures that reduce congestion at the Blackwall Tunnel and improve resilience across the (sub-regional) highway network
- An appeal for the restoration of Blackwall Tunnel contraflow during emergency periods
- Some support for expansion of ferry services at Woolwich and a new service at Gallions Reach, some support for the extra resilience they would provide (as both Blackwall Tunnel and Woolwich Ferry are subject to delays)

Opposition to new road crossings and enhanced ferry services

- Opposition to new vehicle crossings, owing to social and environmental impacts such as reduced air quality, increased CO₂ emissions and congestion due to traffic generation
- Opposition to a fixed link crossing at Gallions Reach due to potential higher capacity and therefore traffic generation impacts
- Other stakeholders oppose expansion in vehicle ferry operations due to the increases in traffic in the local area and/or their low capacity compared to a fixed link

Support for public transport, walking and cycling

- Support for an increase in the provision of cross-river public transport, walking and cycling connectivity and capacity
- Some stakeholders agree that a new vehicular crossing is necessary (for private vehicles and freight) but feel a comprehensive package of mitigations including measures such as public transport priority, improved pedestrian and cycle provision and/or tolling is needed to suppress traffic growth

Costs, timescales and other construction issues

- Concern over the high cost (or lack of budget) of any new crossing and the long timescales involved
- Suggestions as to how new crossings could be funded and built
- Wish to preserve the historic environment within any new Thames crossing schemes

Local issues in west London

- Support for local west London Thames crossings – pedestrian/cyclist fixed crossings or ferry services to improve sub-regional connectivity and increase public transport catchment areas (for example, extending the reach of Imperial Wharf station south into Wandsworth)

Editorial comments

- More detail is needed before contributing further comments and comments that it is unclear what the final proposals might be

TfL Response

Support for new or improved road crossings

Section 5.8 of the public draft MTS contains background to, and support for, a package of new Thames crossing options in east London. Proposal 39 sets out in slightly more detail options for improving crossings in east London and highlights the Mayor's support for a package of improvements in the longer term.

Although the Dartford crossings are outside Mayoral jurisdiction, two thirds of the traffic that uses it has an origin or destination in the GLA boundary and therefore it is appropriate the MTS commits the Mayor to work closely with the relevant authorities to seek improvements. Accordingly, TfL recommends a change to the MTS text.

Section 5.8 explains the need for improved resilience at existing river crossings and the effects lack of resilience has on the local road network. TfL considers that the MTS should however explain more clearly the importance of improved crossing, particularly for commercial vehicle trips for which no alternative to a road crossing exists.

Restoration of the Blackwall Tunnel's contraflow during emergency periods would conflict with measures to improve road safety as set out in Policies 19 and 20 and Proposals 70-71 [69-70]. It would also restrict HGV usage of the tunnel. TfL considers that measures in Policy 10 and Proposals 30-35 and the support expressed in sections 5.6.5 [5.6.3], 5.6.6 [5.6.4], 5.6.7 [5.6.7] and 5.15.2 [5.14.2] will help improve resilience, reduce local congestion and improve capacity and connectivity. TfL recommends no change.

Opposition to new road crossings

Proposal 39 sets out the criteria for development of any river crossing. Proposals 35 [34] and 130 [129] address development of the wider road network as well as the need to mitigate any adverse impacts, including through tolling on new crossings and potentially wider road user charging in the longer term.

In accordance with national and EU regulations and policy, scheme options will be subject to full environmental assessment – in accordance with the relevant regulations, including consideration of social and environmental impacts and the need for any mitigation. TfL recommends no change.

Support for public transport, walking and cycling

TfL considers that the MTS should offer measures to reinforce the Mayor's commitment to reducing demand on the highway network in East London (i.e. on the approaches to the crossings), wherever possible by encouraging greater use of public transport, walking and cycling facilities and use of more sustainable freight distribution measures. TfL recommends that the text should also be re-arranged to emphasise that these measures would be introduced in advance of any new road crossing.

Policies 3 and 11, and Proposal 60 [59] parts (b) and (j) seek to improve pedestrian connectivity.

Costs, timescales and other construction issues

Proposal 130 [129] provides support for the introduction of tolls to finance specific infrastructure improvements such as river crossing if appropriate. However, TfL considers that this should be highlighted within section 5.7 as well to improve clarity.

The Outcomes table in Figure 2 states the Mayor's recognition of the challenge to enhance the built and natural environment, which includes the 'historic environment', as specified in Proposal 83 [82].

The Implementation Plan in chapter 7 offers details to the proposed phasing of the package of river crossings.

Local issues in west London

Policies 3 and 11, and Proposal 59 [60] parts (b) and (j) seek to improve pedestrian connectivity. However matters such as pedestrian and cycle crossings in west London, and the specific details of any such measures, would be more appropriately addressed as part of the Sub-regional Transport Plan and/or Local Implementation Plan process. TfL recommends no change.

Editorial comments

While it is understandable that some stakeholders wish to see further scheme details at this stage, it is not considered appropriate to provide this type of information in the MTS in its role as a regional transport strategy. Proposal 39 outlines potential options for further scheme development but does not prejudice option at present. TfL recommends no change.

TfL Recommendations

Insert text in section 5.8 to highlight the potential to further enhance pedestrian, cycling and public transport crossing facilities and to re-affirm commitment to modal shift from car, and measures that can be taken to reduce the impact of freight on the highway network

Update section 5.8 to reflect the economic and population growth of east London to highlight the lack of alternatives to the Blackwall Tunnel and its importance to delivery and servicing activity

Change wording of Proposal 39 part (e) to focus resources onto modal shift from the car and to highlight the rail infrastructure available to implement the proposal

Insert text in section 5.8 to highlight the possibility that tolling of existing and/or new crossings could fund infrastructure improvement schemes, and potentially provide an instrument for managing demand

17. Transport Opportunities for All

Section 4.2.2.2 of the Public Draft MTS describes the approach to increasing transport accessibility Londonwide. Sections 4.5.1 and 4.5.2 describe the approach to improving transport opportunities for all Londoners and improving accessibility. Section 5.9 outlines the proposals for a more accessible transport system and section 5.23.2 outlines proposals for concessionary fares. Policy 3, Policy 21, Proposals 40 to 44, Proposal 120 and the Accessibility Implementation Plan (section 7.2) takes this approach forward.

Analysis of responses

52 stakeholders commented on issues relevant to this section. These were:

Age Concern London, Better Bankside, Campaign for Better Transport, Chartered Institution of Highways and Transportation, Commissioning Support for London – NHS, Community Transport Association, Friends of Capital Transport Campaign, Guide Dogs for the Blind Association, Hertfordshire County Council, Independent Disability Advisory Group (IDAG), Inclusion London, Jenny Jones AM, London Assembly, London Borough of Barking & Dagenham, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Hackney, London Borough of Havering, London Borough of Harrow, London Borough of Hounslow, London Borough of Hillingdon, London Borough of Islington, London Borough of Lewisham, London Borough of Newham, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Civic Forum and Youth Campaign for Better Transport, London Councils, London Disability Cycling Forum, London Forum of Amenity and Civic Societies, London Liberal Democrats, London TravelWatch, London Visual Impairment Forum, NHS Lambeth, North West London Hospitals NHS Trust, Park Royal Partnership, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Royal National Institute for the Blind (RNIB), Royal National Institute for the Deaf (RNIB), Transport for All, Transport Planning Society, Transport Salaried Staffs' Association (TSSA), TUC, Unite, Valerie Shawcross AM, and West London Partnership.

In the public questionnaire, Question 2 invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment, 7 per cent of respondents made a comment with regard to physical accessibility improvements, for example step-free Tube stations and bus ramps. In the email and letter responses from other organisations, 16 of the 55 respondents made comments on this issue. Respondents indicated that while they supported the proposals, they would like more to be done.

Issues Raised

The following is a list of the issues raised:

- Support for the approach to accessibility and improvements that are being delivered
- Concern over and/or opposition to cuts in the step-free station programme. Many want the step-free programme to be reinstated and step-free provision to be prioritised, with targets for number of step free stations and completion of bus stop accessibility programme
- More needs to be done to enhance accessibility of public transport (e.g. ramps for river boats) with more consistent standards across all public transport modes; TfL should investigate more cost effective measures than step free provision
- Cars should be considered as part of the accessible transport network and parking must be available to those who are unable to walk, cycle or use public transport
- Requests for specific references to 'equity', the Social Model of Disability, hidden impairment (including mental health), and clearer language (especially the definition of accessibility and step-free). Should also consider mental impairment, pregnant women and disabled hate crime
- More support for, and detail, is needed on local access to services, with specific local schemes requested to be included in the MTS. More detail is needed on access in deprived areas
- Access to health services needs to be improved with better coordination between transport and health providers
- Disabled groups should be better engaged in MTS and scheme design process (e.g. accessibility and mobility forums, Better Streets). TfL should provide support, including sharing best practice, to disability groups
- Need better information for the disabled, including use of technology and improved access to tickets, ticket office facilities and travel planning at certain stations
- Better staff training needed, especially bus drivers and Dial-a-Ride staff with raised awareness of disabled/older people amongst staff and passengers. More funding should be provided for travel mentoring
- There is insufficient detail on, or policy support for, Dial-a-Ride and other demand responsive modes and that service provision needs to be integrated and more consistent across London. Dial-a-Ride should accept the Freedom Passes, give a guaranteed return trip and there should be a transparent complaints system
- Who benefits from concessionary fares should be clarified and should be extended to other groups (e.g. apprenticeships). There should be a standard

London wide approach to concessionary fares/Freedom Pass, including on National Rail services

- The design of buses needs to be reviewed
- The Public Transport Accessibility Level (PTAL) methodology needs to be refined
- Response times for broken lifts/escalators should be given
- Little mention in the executive summary of implications of the MTS for disabled people

TfL Response

Statements of support

Statements of support are acknowledged and welcomed.

Step-free programme

It is acknowledged that the decision to suspend some of the step-free station projects in the latest TfL Business Plan due to the current financial climate causes concern, particularly to disabled people. However, step-free station access is only one element of making the public transport system more accessible and TfL is committed to improving access for mobility impaired and disabled passengers in a variety of ways. Proposal 40 sets out the approach to, and a commitment to work with partners on, improving accessibility of the transport system. The PD MTS takes a 'whole journey' approach and proposes a range of initiatives to reduce journey time differentials and improve journey experience for all. This includes better safety and security, information provision and staff training, developed in consultation with disabled groups.

The Accessibility Plan in section 7.2 of the public draft MTS sets out a timetable for the implementation of relevant proposals. TfL's Disability and Deaf Equality Scheme (DES) also sets out, in more detail than the MTS, what action TfL will take to ensure that its services are accessible to disabled people as well as giving greater detail on TfL's approach to disability equality. TfL has recently carried out a public consultation on the new DES which will apply up to the end of 2012. Section 5.9.1 in the PD MTS reaffirms the link to the DES. No changes are therefore recommended.

More needs to be done to enhance the accessibility of the public transport network.

As set out in the paragraph above, TfL are proposing a variety of measures to enhance the accessibility of the public transport network and this is taken forward in more detail in the DES. Therefore no change is recommended.

Cars to be considered as part of the accessible transport system

The emerging London Plan sets out the requirements for disabled parking provision in new developments. Section 5.9.1 sets out support for the Blue Badge scheme to give priority parking for disabled people in key places such as town centres and at stations and a 100 per cent exemption from the Congestion Charge. Measures to improve journey time reliability on the road network, such as smoothing traffic (Proposal 30) will benefit all road users. Therefore no change is recommended.

Specific mention of groups/concepts wanted

The MTS is a strategic document and as such cannot contain reference to every approach or every interest group. The DES contains TfL's approach to disability equality and covers in greater detail on which groups TfL engage with. Therefore no change is recommended.

More detail on access to local services and specific areas/deprivation areas

Policies 3 to 9 in the PD MTS set out the approach towards improving access to jobs and services. Policy 22 sets out the approach to tackling deprivation. Specific schemes to deliver these policies are more appropriately covered in the Sub-regional Transport Plans, Local Implementation Plans and modal delivery plans. Therefore no changes are recommended.

More needed on access to health

It is agreed that better coverage of access to health services is appropriate and that the MTS should emphasise the need for coordinated working with health providers. Therefore TfL recommends that text in the MTS is strengthened to reflect stakeholder comments on this matter.

Better engagement needed with disabled groups

The DES sets out how TfL involves deaf and disabled people in developing its policies and proposals – for example the Citizens Jury. The public draft MTS outlines how disabled people will be consulted when designing better streets schemes. Therefore no changes are recommended.

Better information for disabled people is needed

Section 5.6.2 and Proposal 41 states how enhancing information provision will reduce barriers to travel. The DES also sets out a number of measures to improve information provision and access to ticketing, for example enhancements to the TfL Journey Planner. Therefore no changes are recommended.

Better staff training is needed

Proposals 42 and 43 outline how staff service and training and the attitude of passengers and staff towards each other will be improved. Section 5.9.3 states support for travel mentoring. The Accessibility Implementation Plan and DES sets

out how and when these proposals will be delivered. Therefore no change is recommended.

More needed on Dial-a-Ride and other door to door services

TfL accepts that the section in the public draft MTS on door-to-door travel (Section 5.9.4) focuses on Dial-a-Ride, only mentions Taxicard in one place and does not mention Capital Call. Proposal 44 in the public draft MTS refers only to Dial-a-Ride. TfL recommends that the text and proposal be amended to state support for other door-to-door services. However, the MTS is not the appropriate place to consider detailed changes to Dial-a-Ride operation, which would be covered in modal delivery plans.

More needed on concessionary fares with extension to more groups

Proposal 120 states that concessionary fares will be kept under regular review and therefore it is inappropriate for the MTS to go into any further detail. No change is recommended.

Bus design needs to be reviewed

Proposal 25 outlines proposals for a new bus for London, which will be designed in consultation with disabled users and will meet the appropriate statutory accessibility requirements. Therefore no change is recommended.

Change in PTAL methodology needed

Public Transport Accessibility Levels (PTALs) are a transport planning tool that is used widely throughout London. It is not appropriate to consider revision to the methodology in a strategic document such as the MTS. Therefore no change is recommended.

Targets for response times to lift/escalator breakdowns should be given

Detailed operational issues like response times for broken lifts/escalators are not appropriate for inclusion in a strategic document such as the MTS and would form part of modal delivery plans. Therefore no change is recommended.

Little mention of disabled people in the executive summary

While the Executive Summary is not intended to provide full details about any aspect of the MTS, it does outline the approach to disability equality and physical accessibility; therefore no change is recommended.

TfL Recommendations

Add additional references to access to health services and working with health providers, including in the Case study: *Working with the NHS to improve access to health services*; and in the definition of '*Biking Boroughs*' in Glossary

Add a definition of Polyclinics in Glossary

Add additional text in section 5.9.4 to include other forms of door-to-door transport such as Capital Call and Taxicard

Add additional text in Proposal 44 supporting other door-to-door services

18. Integrating London's Transport System and Services

Section 5.10 of the Public Draft MTS discusses the approach to integrating London's transport system and services through improved interchange and strategic interchanges. Proposals 45 and 46 take this approach forward.

Analysis of responses

Fifty-six stakeholders commented on issues relevant to this section. These were: Association for Consultancy and Engineering (ACE), ATOC, Automobile Association, Better Bankside, Campaign for Better Transport, Campaign to Protect Rural England, CBI, Chartered Institute of Logistics & Transport, Corporation of London, CTC, English Heritage, First Capital Connect, Friends of Capital Transport Campaign, Hertfordshire County Council, Highways Agency, Institute of Civil Engineers (ICE), Living Streets, London Borough of Barking & Dagenham, London Borough of Brent, London Borough of Bromley, London Borough Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Greenwich, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Newham, London Borough of Richmond upon Thames, London Borough of Southwark, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Councils, London Cycling Campaign, London Forum of Amenity and Civic Societies, London Liberal Democrats, London Thames Gateway Development Corporation (LTGDC), London Travel Watch, London Visual Impairment Forum, National Express East Anglia and C2C, Park Royal Partnership (PRP), Railfuture, Royal Borough of Kensington & Chelsea, Society of Motor Manufacturers and Traders Ltd (SMMT), South East England Regional Transport, SWELTRAC, Transport Planning Society, West London Partnership and Westminster City Council.

The public questionnaire included a question on which measures would most benefit interchange in London, which was answered by 80 per cent of respondents (87 per cent of responses via the web and 75 per cent of paper responses). The measure which was most often selected was "reducing the need to come in to central London to interchange for journeys to other places" (50 per cent of respondents). Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 4 per cent of respondents made a comment with regard to interchange. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

- Support the strategic interchange concept
- Should ensure an interchange is provided between Crossrail and orbital services in West London and other interchange priorities
- Must balance potential conflicts between enhanced orbital rail services with capacity and journey time for radial services
- Should make more of the role of interchange improvement schemes in unlocking development/regeneration opportunities
- Must ensure there is sufficient station capacity to cater for passenger demand
- Must improve walk/cycle links to/from stations and facilities at stations
- Information provision at interchanges should be improved
- Support for and opposition to new park and ride schemes

TfL response

Support

Comments in support for the approach to improving interchange and the strategic interchange concept are noted and welcomed.

West London interchange

The merit of an interchange opportunity between orbital London Overground services and Crossrail in west London is recognised. However, plans for this location will be heavily influenced by the emerging concept of a 'West London Interchange' as part of proposals for a new high speed rail line from London to the West Midlands and the north of England. TfL supports the principle of both a new high speed rail line and a new interchange in West London, between high speed services and Crossrail. This was recently announced as the preferred option of the Government in the March 2010 White Paper. However, proposals are currently at too early a stage of development for them to be included in MTS.

The concept of strategic interchanges has been developed to relieve passenger dispersal congestion pressures at London's rail termini and ensure that the full potential benefit of the upgraded London Overground network is realised. A number of stakeholders identified interchange upgrade priorities, some of which corresponded to the strategic interchange examples shown in Figure 46[44] of the public draft MTS. Catford / Catford Bridge, Elephant and Castle and West Croydon are recommended to be added to a revised Figure 46 [44] as they align with the concept as outlined in Figure 45 [43] and Proposal 46 and analysis shows significant potential demand. However, some of the interchange priorities identified by stakeholders did not align to the strategic interchange concept as outlined in these

Figures and the relevant proposal, or analysis shows there to be low levels of potential demand: these are therefore not recommended for inclusion. It should be noted, though, that the strategic interchanges identified in Figure 46 [44] are examples and non-inclusion does not depreciate the key role of other interchange locations in London's transport system.

Orbital rail and radial services

TfL recognises that there may be conflicts between further enhancements to orbital rail services and capacity, and journey times on key radial rail routes. It is intended that these be managed through detailed discussions with relevant stakeholders and are not considered appropriate for specific reference in the MTS. TfL recommends no change.

Interchange and regeneration

The development of strategic interchanges, and indeed other interchange enhancements, often presents excellent opportunities to accommodate London's growth in accessible locations. It should be noted that a number of strategic interchanges identified in Figure 46 [44] correspond to London Plan Opportunity Areas. The London Plan contains policy support for encouraging development in areas of high public transport accessibility, which invariably strategic interchanges are. The Sub-regional Transport Plans and Opportunity/Intensification Area Planning Framework process will examine in more detail the potential synergies of interchange enhancements and development to accommodate London's growth sustainably. No further change is recommended.

Station capacity

Station capacity issues are addressed in the Rail and London Underground chapters, specifically Proposal 11 and Proposal 19, and no change is recommended.

Walking and cycling links

Improvements to walking and cycling links to and from stations and improvements of facilities at stations including cycle parking are addressed in the cycling chapter of the public MTS and in the cycling section of this report.

The proposed approach to physical accessibility issues is outlined in section 5.9 of the public draft MTS, and the Transport Opportunities for All section of this report.

The MTS sets out key criteria which the boroughs and/or other stakeholders should address when making the case for new park and ride facilities in Proposal 127 [126]. TfL has published a 'Park and Ride Framework' which provides more detailed guidance on the assessment of proposals for new park and ride facilities. It is recommended that a reference is added in the final MTS to the TfL Park and Ride Framework.

TfL Recommendations

Catford / Catford Bridge, Elephant and Castle and West Croydon to be added to Figure 44

A reference to the Park and Ride framework published by TfL be added to the MTS

19. London's airports

Section 5.11 of the Public Draft MTS sets out policies and proposals for London's airports, including the Mayor's opposition to expansion of London Heathrow. Section 5.18.3 addresses the issue of aircraft noise. Proposals 47 to 49 and Proposal 88 take the approach forward.

Analysis of responses

Sixty-six stakeholders commented on issues relevant to this section, these were:

Association for Consultancy and Engineering (ACE), Association of International Courier and Express Services, Aviation Environment Federation (AEF), CBI, Chartered Institute of Logistics & Transport UK, Corporation of London, Department for Transport, East of England Development Agency, English Heritage, Environment Agency, Federation of Small Businesses, First Capital Connect, Friends of Capital Transport Campaign, Friends of the Earth, Heathrow Airport Limited, Heathrow Hub Limited, Hertfordshire County Council, Jenny Jones AM, Kent County Council, London Assembly, London Borough of Barking & Dagenham, London Borough of Bexley, London Borough of Bromley, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Greenwich, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lewisham, London Borough of Newham, London Borough of Richmond upon Thames, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest, London Borough of Wandsworth, London Chamber of Commerce and Industry, London City Airport, London Civic Forum, London Councils, London First, London Forum of Amenity and Civic Societies, London Gatwick Airport, London Liberal Democrats, London Thames Gateway Development Corporation (LTGDC), London TravelWatch, London Sustainable Development Commission, North London Strategic Alliance, RAC Foundation, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, South East England Development Agency, Sustrans, SWELTRAC, Tandridge District Council, The Chartered Institution of Highways and Transportation, TSSA, TUC, Unite, Valerie Shawcross AM and West London Partnership.

Comments on aviation from the public, businesses and other organisations made up less than one per cent of all public responses to the consultation. Eight of the twenty-four open responses from businesses commented on surface access to airports and High Speed Rail and these comments were supportive of High Speed Rail. The

issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

Opposition to/ Support for Heathrow expansion

- Support for the Mayor's approach to aviation, including opposition to expansion of Heathrow airport
- Some stakeholders wish to see greater elaboration of the reasons for the Mayor's opposition to Heathrow expansion
- Calls to expand Heathrow airport and suggestions that impacts can be mitigated against (i.e. that DfT targets would provide safeguards)

Environmental concerns

- Support for Proposal 88 regarding aircraft noise
- Criticism over the current approach to predicted growth for air travel
- Requests for more demand management measures, for social and environmental reasons

High Speed Rail

- Support for High Speed Rail (HSR) to mitigate the need for expansion at Heathrow, either by short haul rail substitution or redistribution of air travel demand to other UK airports
- Claims HSR not an adequate substitute for a third runway at Heathrow

Other airports outside London (including Thames Estuary Airport)

- A few stakeholders wish to see a clearer position on the Thames Estuary Airport concept, based on Mayoral announcements over the past year, before submitting their views
- Opposition to Thames Estuary Airport concept based on Mayoral statements made since 2008, rather than draft MTS or emerging London Plan content
- Concern about social and environmental impacts of potential growth at Stansted (if G2 programme were to receive clearance from Secretary of State) and Gatwick airport (if a second runway were to be built beyond the 2019 moratorium)

Surface access

- Wide support for improving public transport links to airports including improving outer London connectivity and capacity of corridors to major airports serving London, e.g. Airtrack, further Heathrow rail links, Crossrail

interchange at London City Airport, better links to Gatwick, Luton and Stansted

- Growth at Heathrow should be restricted due to lack of surface access capacity

Other London airports

- Some stakeholders express support for expansion beyond current limits of London City and Biggin Hill airports, and other airports outside of London including new heliport facilities
- Opposition to further growth of London City airport due to noise impacts on local residents (flights now capped at 120,000 air traffic movements (atm) per annum from previous 80,000 limit)
- Claims that draft replacement London Plan paragraphs 6.24 and 6.25 could be interpreted as support for further growth at London's other airports

Other issues

- Claims that MTS needs to express more support for time-critical air freight
- Editorial points raised and suggestions to replace text

TfL response

Opposition to/ Support for Heathrow expansion

Support for the Mayor's position is noted and welcomed.

TfL recommends that explanatory text should be added regarding the Mayor's opposition to Heathrow expansion, based on noise and air quality impacts and capacity pressures on existing (and planned) surface access infrastructure. The final decision on airport expansion remains with the Government.

TfL considers that the economic benefits for, and social and environmental impacts of aviation on London are reflected in Proposals 48-50 [47-49] of the MTS and Policy 6.6 of the draft replacement London Plan. These provide the regional planning policy basis to ensure that aviation can continue to support London's competitive position within the global economy, taking full account of environmental impacts and provided the aviation industry meets its full environmental and external costs.

It is recommended that text be inserted within section 5.12.1 [5.11.1] to reflect the need for co-operation with planning authorities outside London, as highlighted in the draft replacement London Plan.

Environmental concerns

TfL considers that concerns over greenhouse gas emissions are addressed as far as practicable at a regional level. Policy 24 includes a target to reduce CO₂ by 60 per

cent by 2025, from a 1990 base. This target includes emissions from ground-based aviation. This is augmented by Proposal 101 [100].

TfL considers that measures to address air quality and noise impacts of aviation and surface access transport are contained within MTS Policies 15 and 16 and Proposals 50 [49], 89 [88], 94 [93] and 95 [94] as well as in the draft Mayor's Air Quality Strategy.

Proposal 49 [48] should be strengthened to reflect the need for the aviation industry to invest in measures to reduce and mitigate its social and environmental costs, as per Policy 6.6 in the emerging London Plan.

TfL considers that support for a more far-reaching demand management for aviation would be incompatible with the approach outlined in section 5.22.5 [5.20.5] and Proposal 48 [47] as well as draft replacement London Plan policy 6.6.

TfL recommends that section 5.22.5 [5.20.5] be cross-referenced from section 5.12 [5.11], and that section 5.22.5 [5.20.5] should reflect the role of emissions trading and to highlight that measures to curb flights from London and the south east may encourage growth elsewhere, for example at competitor airports in mainland Europe.

High Speed Rail

TfL considers that MTS Proposal 4 and the text in section 5.12.1 [5.11.1] demonstrate clear support for High Speed Rail which could have the potential to replace some domestic or short haul flights. Hence, no change is recommended. Moreover, it should be noted the ultimate decision on such a network would be made by the Government.

Other airports outside London (including Thames Estuary Airport)

Comments regarding the position of other airports in London and the South East have been noted, however TfL does not recommend any changes to the PD MTS as there is a need to be consistent with the emerging London Plan. The latter may be subject to changes following the Examination in Public in the summer.

Furthermore, possible expansion of other airports serving London and the South East are beyond the Mayor's direct control and would be primarily a matter for national transport and planning policy, although the London Plan would be a consideration in any planning decision.

It will be important to mitigate the impacts on the Capital's transport network arising from any expansion of airports outside London. It is considered that no change to the Proposals 49 [48] and 50 [49] is needed, as they support measures to improve public transport capacity and connectivity to airports serving London. However TfL considers that text should be inserted to reflect co-operation with planning authorities in the South East and East of England regions would also be relevant for this issue.

Surface access

As outlined above, TfL considers that Proposals 49 [48] and 50 [49] support measures to improve public transport capacity and connectivity to airports serving London, hence no change is recommended.

Other London airports and heliports

Comments regarding the position of other airports in London (principally London City and Biggin Hill) from some stakeholders have been noted. However, TfL recommends no changes for the reasons of consistency with the emerging London Plan. The Mayor would have a statutory planning role in any application for airport expansion within the GLA and the London Plan would be a material consideration, as would local (borough) and national policy.

TfL recommends no changes to the PD MTS with regards to heliport expansion as this is addressed in the draft replacement London Plan (Policy 6.6).

Other issues

Factual corrections to be made (see 'TfL recommendations').

Air freight accounts for less than two per cent of total freight lifted in the capital; although this is percentage rises when considered by value of goods. The primary focus of the MTS with regards to aviation is surface access to the airports and accordingly it proposes a range of measures to reduce traffic journey time variability. This will benefit freight on the first or final legs to/from airports and to help the freight sector improve its economic efficiency, social and environmental sustainability. These are addressed by Proposals 30 to 35; Proposal 87 [86] and Proposals 117 to 119 [116 to 118]. Furthermore, Proposal 89 [88] contains measures to work with industry to reduce the noise impact of flights. No changes are therefore recommended.

TfL Recommendations

Insert introductory text to section 5.11 to explain that the scope of the "London's airports" section is limited to capacity and surface access issues, and cross-reference to proposals highlighting the need for carbon efficiency in section 5.20

Insert additional text in section 5.11 to further explain the reasons for opposition to expansion at Heathrow, including surface access impacts

Insert text in section 5.11.1 to emphasise the air quality and noise impacts that could be generated, and cross-references to other relevant sections of the MTS

Insert new text in section 4.2.2.1 highlighting the Mayor's belief that aviation should

meet its full external and environmental costs, as set out in draft replacement London Plan policy 6.6

Insert additional paragraph in section 5.11.1 to reflect the continuing need to co-operate with planning authorities in the South East and East of England regions, as highlighted in London Plan

Clarifications:

Update text in section 5.11.1 to highlight that present airport capacity will limit trips to 180 million per annum in the South East

Proposal 48: highlight the Air Transport White Paper in question was published in 2003

New text inserted at the request of London City Airport to clarify the airport's current capacity limit (120,000 ATMs per annum)

20. The Cycling Revolution

Section 5.12 of the Public Draft MTS describes the approach to achieving a cycling revolution in London. Policies 3, 4, 5, 6, 8, 9, 11, 13, 17, 23, 24 and Proposals 50-57 take this approach forward. Please also see sections in this report on Road Safety, for issues related to cyclist safety.

Analysis of responses

Sixty-seven stakeholders commented on issues relevant to this section. These were:

Association of British Drivers, Better Bankside, British Waterways, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Environmental Health (CIEH), Corporation of London, Cycle Touring Club (CTC), Energy Saving Trust, Enfield NHS Trust, English Heritage, Guide Dogs for the Blind Association, Inclusion London, Institute of Advanced Motorists (IAM), Institute of Civil Engineers (ICE), Jenny Jones AM, Living Streets, London Borough of Barking & Dagenham, London Borough of Brent, London Borough of Bromley, London Borough of Camden, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Harrow, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Merton, London Borough of Newham, London Borough of Redbridge, London Borough of Richmond upon Thames, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Councils, London Cycling Campaign, London Disability Cycling Forum, London Liberal Democrats, London TravelWatch, London Visual Impairment Forum, Natural England, NHS Lambeth, North West London Hospitals NHS Trust, Olympic Delivery Authority (ODA), RAC Foundation, Railfuture, Road Haulage Association, Roadpeace, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Royal Free Hampstead NHS Trust, Royal Parks, Sustrans, South and West London Transport Conference (SWELTRAC), The Ramblers, Transport for All, Transport Planning Society, TSSA, and Westminster City Council.

The public questionnaire included a question about which measures would most benefit cycling in London, which was answered by 73 per cent of respondents (83 per cent of responses via the web and 66 per cent of paper responses). The measure which was most often selected was "Providing more secure cycle parking", (37 per cent). The issues raised in the public responses were broadly similar to those raised by stakeholders.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 14 per cent made the comment, “prosecute dangerous cyclists who do not adhere to the laws of the road.” Eleven per cent made another comment about cycling and nine per cent commented on changes to road layout for cyclists.

Issues raised

The following is a list of the issues raised:

- Request for further clarity on the Biking Boroughs concept and anticipated Cycle Hire extension
- Further clarification on workplace cycling facilities and expected demands on development. There is a need for more cycle parking and/or higher standards of cycle parking and facilities (e.g. secure cycle parking, shower facilities, lockers etc.)
- Concern that too much funding is focused on ‘signature’ cycling schemes (such as Cycle Superhighways) and that the LCN+ will not be completed
- Concern that demand for cycle parking has been underestimated
- There is broad agreement on the approach to cycle safety, however, concern there is no mention of the Commercial Vehicle Education Unit
- Strong call for greater emphasis on cycling etiquette and behaviour
- Call for cycle training, National Bike Week and other events to be directly referenced for promotion
- Concern that there are no interim targets for cycling
- Debate on cycling ‘contraflow’ on one-way streets, some support and also opposition to this concept
- Request for further emphasis on encouraging cyclists from underrepresented groups and support for encouraging children to cycle to schools
- Additional planned cycle parking must be implemented in a consistent manner to ‘Better Streets’ principles and minimise conflict with other users of highway space
- Cycle parking should be retro-fitted to houses and other developments

TfL Response

Inner and Outer London cycle schemes

Biking Boroughs are London Boroughs that work in partnership to prioritise cycling in their Local Implementation Plans (LIPs). A full definition could be provided in the glossary. TfL recommends that further clarification on the potential expansion of the Cycle Hire scheme is provided, acknowledging that any decision will adhere to demand and feasibility studies (Proposal 54 [53]).

Cycle facilities and developments

The exact location and nature of cycle facilities, including parking and changes to road layout will be considered on a case-by-case basis in discussion with boroughs and others. Funding for boroughs is agreed via the LIPs process. The PD MTS also acknowledges the Mayor's planning powers in relation to cycle facilities (Proposal 57 [56]).

Section 5.13 [5.12] of the PD MTS sets out the measures to bring about a cycling revolution, of which cycle parking and integrating cycle provision with development will be supported where appropriate, as set out in Proposals 51[50] to 54[53] and Proposals 57 [56] and 58[57]. Proposal 57 [56] makes specific reference to providing cycle parking to an appropriate standard; in addition, retrofitting facilities is addressed in Proposal 57 [56] and the draft replacement London Plan. TfL recommends no change.

New interventions

The Mayor and TfL are committed to increasing cycling in all parts of London and will continue to support cycling improvements and the provision of training in partnership with the boroughs. TfL recognises that the LCN+ has played an important role in making London a more cycle friendly city, and it is intended that new schemes, such as Cycle Superhighways, will complement the existing network and provide a wider package of measures to support the cycling revolution. TfL recommends that further detail on the complementary measures delivered alongside the Cycle Superhighways should be provided in the MTS in order to acknowledge how funding for this programme is distributed.

Cycle parking

There is no explicit mention of replacing car parking spaces with cycle parking racks in Section 5.13 [5.12] of the draft MTS. However, on-street parking bays are predominantly the responsibility of the London boroughs and Proposals 51[50], 52 [51] and 54 [53] would allow this to happen if considered appropriate.

TfL recommends that further information on the current condition of cycle parking in the capital and further guidance on how it can be improved be added to the MTS. Guidance on improving cycle parking security and a reference to Transport for London's Cycle Parking Standards should also be included.

Cycle safety

Many stakeholders are in agreement that cycle safety is paramount to delivering a cycling revolution. Stakeholders called for more to be done to reduce the number of cyclists injured in London (particularly fatal crashes caused by HGVs). Respondents were also concerned that as cycling becomes more popular the actual number of casualties may increase. Following publication of the public draft MTS, the Mayor's

Cycle Safety Action Plan³ was published (this contains references to the Commercial Vehicle Education Unit), and TfL recommends that this should now be referenced in the MTS.

Cycling etiquette and behaviour

Respondents were concerned that the behaviour of some cyclists – not stopping at red lights, for example - had a negative effect on pedestrians and other road users. TfL therefore recommends a change to the PD MTS in order to reinforce the need for mutual respect between all road users and in particular, correct cycling etiquette and behaviour (new section 5.13.6 and amended Proposal 55 [54]). This reference is also linked with section 5.16.5 [5.15.5] (Cyclist Safety), where amendments are recommended to include reference to advanced stop lines and driver behaviour (Proposal 68 [67]).

Cycling events

It is considered that Proposal 53[52] provides an appropriate steer towards ensuring the profile of cycling is accounted for at major events. TfL recommends that MTS should include a direct reference to Bikeability and National Standards for Cycle Training to further clarify cycle training initiatives.

Targets

The MTS delivers an ambitious approach to increasing cycling in London and it is appropriate to set out the overarching level of ambition. Further detail will be developed in partnership with the boroughs through the Sub-regional Transport Plan process. Biking Boroughs are also being encouraged to set their own level of ambitions which will boost the cycling revolution and help deliver targets. TfL recommends no change.

One-way streets

One-way streets can adversely affect the permeability of streets and act as a barrier to cycling. As already indicated, the Mayor is committed to achieving a cycling revolution in London, and TfL therefore considers it appropriate that there is scope to allow consideration of changes such as allowing cyclists to go the “wrong way” down one-way streets. However, Proposal 35 [34] makes it clear that decisions on individual road schemes will use a criteria-based framework, and there is no blanket approach. In this context, there would be consideration given to concerns about potential adverse impacts of changes on other road users before a decision was made. TfL recommends no change.

Underrepresentation of cyclists

³ http://www.tfl.gov.uk/assets/downloads/Cycling/Cycle_Safety_Action_Plan_V3.pdf

The MTS includes a specific note on the benefits of smarter travel initiatives for those from current under-represented cycling groups such as women, children and those with disabilities. Furthermore, cycle training for school children is directly referenced and supported by a reference to school travel planning in section 5.23 [5.22]. This is in addition to the case study for New City Primary School, which provides evidence of how planning can significantly affect cycling levels in schools. However, a more clear acknowledgement is considered helpful and TfL recommends that Section 5.13.4 [5.12.4] be modified to more clearly acknowledge the need to 'mainstream' cycling.

Cosnistency with 'better streets' principles

Creating better streets is an important part of the MTS and the implementation of cycle parking infrastructure falls under the principles set out in section 5.18 [5.17] and in Proposal 83 [82].

TfL Recommendations

Include a definition of 'Biking Borough' in the Glossary. Amend text and Proposal 52 to clarify intentions for the Cycle Hire scheme

Expand the note on Cycle Superhighways to acknowledge accompanying complementary measures

Include a reference to the now published Cycle Safety Action Plan

Add a new sub-section on 'Creating a considerate cycling culture' (5.13.6) and complement this change in Proposal 54. In addition, include a reference to advanced stop lines and driver behaviour in Proposal 67

Include a reference to Bikeability and National Standards for Cycle Training to provide further clarification on cycle training initiatives

Amend section 5.12.4 to directly reference those groups that will benefit from the 'mainstreaming' of cycling Proposal 52

Revise section 5.12.8 to provide further detail and guidance on cycle parking

21. Making Walking Count

Section 5.13 of the Public Draft MTS describes the approach to making walking count in London. Policies 3, 5, 8, 9, 11, 13, 17, 21, 22, 23 and Proposals 58-61 take this approach forward.

Analysis of responses

Fifty-seven stakeholders commented on issues relevant to this section. These were:

Better Bankside, British Waterways, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Environmental Health (CIEH), Community Transport Association, Corporation of London, Energy Saving Trust, Enfield NHS Trust, English Heritage, Institute of Advanced Motorists (IAM), Institute of Civil Engineers (ICE), Living Streets, London Borough of Barking & Dagenham, London Borough of Brent, London Borough of Camden, London Borough of Ealing, London Borough of Hackney, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Merton, London Borough of Newham, London Borough of Redbridge, London Borough of Richmond upon Thames, London Borough of Southwark, London borough of Sutton, London Borough of Waltham Forest Council, London Chamber of Commerce and Industry, London Civic Forum, London Councils, London Disability Cycling Forum, London First, London Liberal Democrats, London TravelWatch, London Visual Impairment Forum, Natural England, NHS Lambeth, North West London Hospitals NHS Trust, Olympic Delivery Authority (ODA), Park Royal Partnership (PRP), RAC Foundation, Railfuture, Roadpeace, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Royal Free Hampstead NHS Trust, Royal Parks, Sustrans, SWELTRAC, The Ramblers, Transport Planning Society, Walk England, and Westminster City Council.

The public questionnaire included a question about which measures would most benefit walking in London, which was answered by 81 per cent of respondents (87 per cent of responses via the web and 77 per cent of paper responses). The measure which was most often selected was “tackling crime and the fear of crime” (47 per cent of respondents). This issue is dealt with in the section in this chapter on Reducing crime, fear of crime and anti-social behaviour. Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 5 per cent of respondents made a comment with regard to walking. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

- Further integration with the Better Streets chapter needed
- No mention of Core Walking Group, London Walking Plan and Physical Activity Strategy or Walkability comparison
- Low attention to the health, economic and social benefits of walking
- More needed on information provision and encouragement to walk
- Further clarity needed on the Mayor's intentions for the Legible London programme and support for appropriate wayfinding systems
- Further clarity needed on the extension of leisure route networks and maintenance of footways
- Not enough mention of open spaces
- Concern over negative impact of more pedestrian capacity, crossings and streetscape improvements on road capacity
- Lack of ambition and committed funding for walking

TfL Response

Better Streets

The principles of 'better streets' are outlined in section 5.18 [5.17], however, it is considered an addition of text to section 5.14 [5.13] would reinforce the 'better streets' principles and provide clarification on how the 'enrichment' of pedestrian movement can be achieved consistently, and TfL recommends this addition.

Links to other plans and strategies

Although there is currently a London Walking Plan based on the previous MTS, it is expected that a revised plan will not be forthcoming. This is due to the change of roles/focus in the delivery of walking improvements, with greater involvement of the boroughs and the revision to LIPs guidance. New schemes will be based on the MTS proposals, but will also be flexible enough to respond to local needs.

Several groups and activities, such as the Core Walking Group and an international 'walkability' comparison, are underway to develop evaluative methods and monitoring techniques for walking improvements. These will help initiate discussions and remain part of a wider package of activities that will evolve throughout the lifetime of the strategy. It is therefore considered not appropriate to directly reference these interventions, and no change is recommended.

Benefits of walking

The PD MTS has a section on 'Promoting the health and environmental benefits of walking' (5.14.4 [5.13.4]) and a corresponding Proposal (62 [61]), however, it does not directly reference the health, economic and social benefits as a rationale behind the promotion of walking. TfL therefore recommends that there should be additional

text throughout section 5.14[5.13] to remain consistent with Policy 17 and state more clearly the many benefits of walking.

Information

The provision of information as a means to increase and encourage walking journeys is outlined in section 5.14.3 [5.13.3] 'Making it easier to plan journeys on foot' in conjunction with Proposal 61[60]. Furthermore, support for this technique is also provided in section 5.24.2 [5.23.2] 'Smarter Travel Initiatives'. TfL recommends no change.

Wayfinding

Proposal 61[60] states the Mayor's intentions on Legible London and acts as a placeholder for further discussion on new wayfinding schemes for boroughs. In addition, funding is available to the boroughs via the restructured LIP process. The MTS also advocates other consistent wayfinding formats and therefore provides scope to adhere to a few borough concerns on the suitability of the Legible London system. It is important that the MTS remains consistent with London Plan on the provision of information for pedestrians. No change is recommended.

Maintenance

The MTS states the Mayor is committed to raise the profile of walking and seeks to encourage the use of the Strategic Walk Network, amongst other leisure route networks. In addition to this, the maintenance of footways is directly addressed in Proposal 34.

The need to assess pedestrian capacity is directly referenced in the MTS under Proposal 60[59], which highlights the need to produce street audits to identify pedestrian needs and guidance (such as pedestrian comfort levels). Furthermore, the effects of streetscape improvements on road capacity is covered within section 5.6. No change is recommended.

Open spaces

The PD MTS does not directly reference the benefits of London's wealth of open spaces as a rationale for the promotion of walking. It is therefore considered appropriate to include an amendment in the revised text.

Funding

With reference to the need for funding for walking improvements, the TfL Business Plan provides a commitment of £154m for the Better Routes and Places directorate (which includes delivery of initiatives). TfL does not considered that any further detailed targets are required within the MTS, and no change is recommended.

TfL Recommendations

Amend the section on walking to reference the principles of 'Better Streets' and ensure consistency throughout the strategy

Include a further reference to the health, economic and social benefits of walking in section 5.14. In addition, directly reference the benefits of open spaces, parks and how these are interlinked with walking opportunities

22. Improving Public Transport Safety

Section 5.14 of the Public Draft MTS describes the approach to public transport safety. Policy 20 and Proposal 62 takes this approach forward. Some stakeholders combined their responses to 5.16 Reducing crime, fear of crime and anti-social behaviour (including terrorism) with public transport safety comments.

Analysis of responses

Sixteen stakeholders commented on issues relevant to this section, these were:

Association of British Drivers, Campaign to Protect Rural England, Hertfordshire County Council, London Borough of Croydon, London Borough of Hackney, London Borough of Hounslow, London Borough of Lambeth, London Borough of Lewisham, London Borough of Redbridge, London Borough of Wandsworth, London Chamber of Commerce and Industry, National Express East Anglia and c2c, Parliamentary Advisory Council for Transport Safety, Railfuture, Royal Borough of Kensington & Chelsea and TUC.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, two per cent of respondents made comments regarding reducing crime and fear of crime in and around transport; and five per cent of respondents made a comment with regard to public transport safety. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised:

General support

- General support for proposals

Staff training and safety

- Calls for improvements to driver training / driving standards to improve public transport safety
- Need to ensure transport worker safety, and to liaise with unions

Infrastructure

- Need to ensure adequate station capacity to deal safely with pedestrian flows

Editorial points

- Should include a wider definition of resilience, including issues such as snow, strikes, terrorist attack, and economic developments, for example oil price rises

TfL Response

General support

Support is noted and welcomed.

Staff training and safety

The importance of driver training is addressed by paragraph text within section 5.15.2 [5.14.2] and Proposal 63 [62] of the PD MTS. However, to reinforce the need to ensure training safety standards are kept high, TfL recommends that the text should be updated slightly.

Ensuring safety is embedded into the work culture is highlighted by paragraph text within section 5.15.2 [5.14.2] and Proposal 63 [62]. Therefore, no change is recommended.

Infrastructure

Ensuring station capacity can deal with pedestrian flows is addressed in section 5.3.4, Proposals 18, 19 and 40. Therefore, no change is recommended.

Editorial points

The resilience of London's transport system is addressed by Policy 10, Policies 24 and 25 and Proposals 35[34], 82[81], 110 [109], 111[110], 112 [111] and 114 [113]. These will improve longer term resilience to disruption from climate change and other potential threats. Therefore, no change is recommended.

TfL Recommendations

Update section 5.14.2 to reinforce the need to ensure training safety standards are maintained

Update Proposal 63 to include a reference to the police as participants in measures to help reduce fatality and injury rates on the transport system

23. Road Safety

Section 5.15 of the Public Draft MTS describes how road safety will be improved over the life of the strategy. Proposals 63 to 72 and Policies 13,17,19 and 24 also relate to road safety.

Analysis of Response

Fifty stakeholders commented on issues relating to road safety, these were:

Better Bankside, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Environmental Health, Community Transport Association, Confederation of Passenger Transport, Corporation of London, CTC, Institute of Advanced Motorists, Institute of Civil Engineers, Jenny Jones AM, Living Streets, London Borough of Barking & Dagenham, London Borough of Camden, London Borough of Croydon, London Borough of Enfield, London Borough of Hackney, London Borough of Havering, London Borough of Hillingdon, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Newham, London Borough of Redbridge, London Borough of Southwark, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Councils, London Cycling Campaign, London Forum of Amenity and Civic Societies, London Primary Care Trusts, London TravelWatch, London Visual Impairment Forum, London Sustainable Development Commission, NHS Lambeth, NHS Tower Hamlets, Parliamentary Advisory Council for Transport Safety, RAC Foundation, Ramblers, Roadpeace, Royal Borough of Kensington & Chelsea, Society of Motor Manufacturers and Traders Ltd, Sustrans, TSSA, West London Partnership and Westminster City Council.

Question 4 of the public questionnaire invited respondents to make any additional comments; one per cent made a comment on road safety. Of the 551 email and letter responses from members of the public, 13 per cent made a comment on road safety, which often advocated further use of 20mph zones, as reflected in the issues raised by stakeholders below.

Issues Raised

The following is a list of the issues raised:

- Support for 20mph zones and speed limits
- Not enough on the safety of pedestrians and other vulnerable road users
- Call for more road user behaviour campaigns and education aimed at reducing the danger to vulnerable road users
- Better enforcement of road rules
- Support for Intelligent Speed Adaptation and calls for it to be introduced in more vehicle fleets
- More ambitious/specific road safety targets needed
- The need for further road safety research
- Improved safety on the TLRN needed
- Better streets and the impact on road safety

TfL Response

20mph zones and speed limits

Section 5.15.9 [5.15.8] recognises the role 20mph zones can play in road safety and TfL recommends that changes be made to the text to clarify and highlight the evidence supporting 20mph zone effectiveness. Stakeholders also suggested a 40mph limit on rural roads, but this is a local issue that should be dealt with at a borough level. Some stakeholders argued for a default 20mph limit in London, but as speed limits in London are determined by many different highway authorities (TfL, the 33 boroughs, Highways Agency) it would not be appropriate to advocate this in the MTS.

Pedestrian safety and road safety education

The PD MTS recognises that action is needed to protect vulnerable road user groups, and Proposals 64 to 73 [63 to 72] relate to improving their safety. Section 5.16.5 [5.15.5] and Proposal 68 [67] outline the actions the strategy will take in regard to cyclist safety. TfL recommends the addition of a paragraph on cyclist safety and Advanced Stop Lines in this section.

The PD MTS proposes the use of education campaigns to improve the safety of vulnerable road users in Proposal 67 [66]. TfL does not recommend a change.

Enforcement

Stakeholders called for further enforcement of the rules of the road and for an increase in the number of police officers. In particular, stakeholders criticised the closure of the Commercial Vehicle Education Unit. The work of this Unit will,

however, continue to be delivered by the Metropolitan Police. Stakeholders expressed concern at the high number of hit and run collisions. Some stakeholders suggested making increased use of speed cameras. Proposal 73 [72] of the PD MTS supports the use of more speed cameras, but it is recommended that a sub-section, 'Road Safety Enforcement' is created to set out further details on how the strategy addresses this issue (section 5.16.8).

Intelligent Speed Adaptation

Proposal 72 [71] of the PD MTS states that the Mayor will encourage the early introduction of Intelligent Speed Adaptation, so TfL does not recommend a change.

Road safety targets

Many stakeholders stated that they would like to see more ambitious targets set for the reduction of casualties, and some highlighted the fact that no targets are included in the MTS. The MTS includes a commitment to producing a new London Road Safety Plan (Proposal 65 [64]), and to meeting the targets set by the Mayor from time to time (Proposal 64 [63]). During the course of the strategy the Government will set new road safety reduction targets and TfL will adopt these. Therefore TfL does not recommend a change.

Road safety research and casualty reduction on the TLRN

Stakeholders called for further research in the area of road safety and for the publication of collision maps so residents can identify collision hot spots. Proposal 66 [65] of the PD MTS outlines how the Mayor will continue to monitor road safety schemes and publish road safety casualty reports and research.

Some stakeholders stated that they would like to see what action TfL is going to take to reduce casualties on the TLRN. The characteristics of the roads that make up the TLRN and the casualty rates on them vary across London, so it is more appropriate to include these details in the Sub-regional Transport Plans, rather than a strategic document. TfL does not recommend a change.

Better streets

Some stakeholders expressed concern that the application of the 'better streets' principles could have a negative impact on the safety of London's roads, and this is considered in the 'Better Streets' section of this chapter.

TfL Recommendations

Create a new section on road safety enforcement (new section 5.15.8 in MTS)

Include text on how evidence supports the use of 20mph and how polices reflect this in section 5.15.9

Include a paragraph on cyclist safety and Advanced Stop Lines in section 5.15.5

24. Reducing crime, fear of crime and antisocial behaviour

Section 5.16 of the Public Draft MTS describes the approach to crime and fear of crime on the transport system, including public transport, walking and cycling. Policy 18 and Proposals 73-81 take this approach forward within the draft MTS.

Analysis of responses

Forty-five stakeholders commented on issues relevant to this section, these were:

Age Concern London, Association of British Drivers, Campaign for Better Transport, Campaign to Protect Rural England, Community Transport Association, Corporation of London, CTC, Energy Saving Trust, English Heritage, Hertfordshire County Council, TfL Independent Disability Advisory Group (IDAG), Licensed Private Hire Car Association (LPHCA), London Borough of Bexley, Croydon, London Borough of Hackney, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Newham, London Borough of Redbridge, London Borough of Southwark, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum and Youth Campaign for Better Transport, London Cycling Campaign, London TravelWatch, London Sustainable Development Commission (LSDC), National Express East Anglia and c2c, North West London's Hospitals NHS Trust, Park Royal Partnership (PRP), Railfuture, RNID, Roadpeace, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, SWELTRAC, The Ramblers, Transport Planning Society, TSSA and TUC.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, two per cent of respondents made comments regarding reducing crime and fear of crime in and around transport; and five per cent of respondents made a comment with regard to public transport safety. Additionally, in the 'Walking' category of Question 2, the measure most often selected was "tackling crime and the fear of crime" (47 per cent of respondents). The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised:

Overall support

- A number of stakeholders expressed general support for policies and proposals, for example safety of public transport services at night. Some respondents offered examples of best practice
- Support for safer travel at night measures

Anti-social behaviour

- Concerns were raised about anti-social behaviour and that the MTS should be more far-reaching

Implementation

- Those likely to be implementing proposals were concerned about the availability of financial or other in-kind resources required for implementation
- Need for further advice on how to roll out community safety partnerships
- Clarity was sought over what constitutes a “priority crime”

Staffing resources

- The availability of staff resources (particularly at stations) and the need to ensure staff safety

Cycling and walking

- Intimidating behaviour of drivers towards cyclists and pedestrians
- Need to do more to curb cycle theft
- Support for measures to design out crime but warnings over its negative impacts (e.g. closing convenient pedestrian routes)

Hate crime

- Concerns over hate crime against disabled people on transport

Editorial matters

- The Mayoral goal and heading in section 4.4 state the overall policy aim of “Improving the safety and security of all Londoners”. Issues regarding definition of Londoners (and implied disregard for the safety and security of non-London residents)

TfL Response

Overall support

Statements of support and best practice examples have been noted.

TfL considers that safety of night-time travel is addressed by Proposals 26 [26], 27 and 81 [80] supported by text in section 5.17.9 [5.16.9] in the PD MTS. TfL recommends no change.

Anti-social behaviour

Anti-social behaviour is addressed in Policy 18 [18] and Proposals 74 [73], 75 [74] and 77-80 [76-79], further reinforced by an indicator measuring public perception of

crime and anti-social behaviour on the transport system, outlined in chapter 9. TfL recommends no change.

Implementation

The three-yearly Community Safety Strategy (CSS) outlined in Proposal 74 [73] will offer greater detail as to the Mayor's community safety priorities

The CSS will aid the implementation of proposals in the MTS. Sub-regional Transport Plan process and TfL's business as usual activity (e.g. engagement with boroughs, police etc) will also address the issue.

Financial resources for community safety expenditure are outlined in the TfL Business Plan. Moreover, the measures in the MTS aim to improve the value of money invested in policing resources. Further details will be provided within the three-yearly Community Safety Strategies, the first of which will be published later in 2010. TfL recommends no change.

Staffing resources

Staff safety and deployment issues are addressed by Proposals 75 to 77 [74 to 76] which seek to improve the availability and efficiency of uniformed staff, ensuring they're deployed where needed. This is also supported by Policy 18 [18]. TfL recommends no change.

Cycling and walking

The suitability of 'Designing out crime' measures are addressed by Proposal 78 [79] which provides enough flexibility to tailor design measures to be sensitive to local environments.

TfL considers that measures to improve the attitudes of other road users towards pedestrians and cyclists are outlined within policies 18 [18] and 19 [19], proposals 54 [53], 55 [54], 60 [59] and 75 [74]. However, TfL recommends that this be further reinforced with new paragraph text.

TfL considers that measures to curb cycle theft are outlined in Proposal 54 [53], but recommends that this could be further reinforced with new paragraph text.

Hate crime

TfL considers that general support for measures to reduce hate crime and improve personal security for more vulnerable people in the network are found in Policies 18 and 21 and Proposals 42 and 43. The Disabled and Deaf Equality Scheme contains more detail on how TfL is addressing these issues over the next three years. Moreover, reducing discriminatory behaviour is a statutory requirement under the Disability Discrimination Act (2005).

Editorial matters

"Londoner" is defined within the Glossary of the MTS and aims to encompass anyone who may be using the transport system. Furthermore, it should be highlighted that the safety of visitors to London may be improved especially by measures such as those to reduce taxi touting (Proposals 26 and 27) improve customer service (Policy 21 and Proposals 18 and 42), information provision (Proposal 115 [114]) and the safety of travel at night (Proposal 81 [80]) as well as consideration of pedicab licensing (Proposal 56 [55]) which will be of particular benefit to tourists.

TfL Recommendations

TfL recommends that the importance of improving attitudes of other road users towards pedestrians and cyclists could be further reinforced with new paragraph text, (see section 5.13.6 in MTS)

TfL recommends that existing measures to reduce cycle theft, a reference to the intention to publish a new Cycle Security Action Plan and the role of partnership working be emphasised with new paragraph text in section 5.12.5

25. Better Streets

Section 5.17 of the Public Draft MTS describes the approach to achieving better streets in London. Policy 14 and Proposals 82-84 take this approach forward.

Analysis of responses

Forty nine stakeholders commented on issues relevant to this section. These were:

Association of British Drivers, Better Bankside, Campaign for Better Transport, Campaign to Protect Rural England, English Heritage, Friends of Capital Transport Campaign, Guide Dogs for the Blind Association, Inclusion London, Living Streets, London Borough of Bexley, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Redbridge, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum , London Civic Forum and Youth Campaign for Better Transport, London Cycling Campaign, London Disability Cycling Forum, London Forum of Amenity and Civic Societies, London TravelWatch, London Visual Impairment Forum, Park Royal Partnership (PRP), RAC Foundation, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, RNIB, RNID, Royal Parks, Southwest London Transport Consortium, Sustrans, The Automobile Association, The Crown Estate, The Ramblers, Transport for All and the Transport Planning Society.

The public questionnaire included a question about which measures would most benefit better streets. This was answered by 77 per cent of respondents (83 per cent of responses via the web and 69 per cent of paper responses). The measure which was most often selected was “Removing unnecessary signage and clutter” (47 per cent of respondents).

The public questionnaire also invited respondents to specify any other measures which they consider would bring benefit to travelling in London. Three per cent of respondents made a comment with regard to shared space/better streets. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

Shared space

- Concern about the potential impact on visually impaired people's ability to safely navigate shared space/'better streets'
- Concern of the use of the term shared space
- Support shared space provided different users are taken into account

Design issues

- Comment suggesting greater weight given to historic environment and current landscape in better streets scheme design
- Concern that the local context needs to be taken into account in better street scheme design
- Concern over new street furniture suggests consideration in Better Streets (e.g. electric charging points)
- Comment suggesting Better Streets section makes reference to more informal crossings to improve conditions for pedestrians
- Concern that interventions need to go further to improve the urban realm
- Concern that smoothing traffic flow will prevent improvement to urban realm
- Support removal of street 'clutter'

Process

- Suggest the MTS should outline how to share best practice
- Concern of the need to ensure any better street project has sufficient consultation
- Support better maintenance of public realm

General comment

- Supportive statements on better streets
- Concerns raised regarding local issues and the quality of the public realm
- Suggestion that better streets be linked to mode shift

TfL Response

Shared space

One of the aims of better streets, as set out in Proposal 83 [82] in the Public Draft MTS is to make it easier for disabled people to get about and Proposal 84 [83] states that better streets will be accessible for all. Additionally, sections 5.18.2-5.18.4 [5.17.2-5.17.4] set out that the needs of those with reduced mobility, visual impairment and deaf people will be taken into account and these users will be consulted when designing better streets. TfL recommends no change.

TfL acknowledges that there is concern around the use of the term 'shared space', and that this term may mean different things to different people. Accordingly, the MTS uses the term sparingly, whilst the Glossary has a definition of shared space to clarify what it means in the context of the MTS. TfL recommends no changes.

TfL also accepts that all users need to be taken into account when designing any shared space or 'better streets' scheme. As this is covered in Proposal 84 [83] of the PD MTS, TfL recommends no change.

Design issues

Section 4.3.3 of the PD MTS states that the definition of 'Built Environment' includes the historic environment for the purposes of the MTS. Proposal 83 [82] seeks to enhance and protect the historic environment.

Section 5.18.2 [5.17.2] recognises the importance of the local context and acknowledges that every street is different and so there can be no 'one size fits all' approach.

TfL accepts that any new street furniture needs to be well planned, and the principles for interventions to improve streets are set out in section 5.18.2 [5.17.2].

It is acknowledged that a potential option for improving conditions for pedestrians is the provision of informal crossings. However this might not be an appropriate solution for each location, and the local context needs to be considered. The principles outlined in Section 5.18 [5.17] give enough scope for such interventions to be considered.

The principles and stages to improve the streets are shown in Figures 53 and 54 [51 and 52]. It is considered that as they are high level, they do not limit ambition of interventions.

A good quality urban realm and the smoothing of traffic flow are not mutually exclusive goals. There are examples of good street design which also allow motor traffic. TfL recommends no changes with regard to design issues.

Process

Activities to promote best practice are already being undertaken by the Mayor with support for New London Architecture and Urban Design London, and it is not appropriate for the MTS to be a best practice document. Any 'better streets' project will have appropriate consultation, as set out in section 5.18.4 [5.17.4]. TfL recommends no changes.

General comment

Specific issues relating to improving the public realm are more appropriately covered in the Sub-regional Transport Plan or Local Implementation Plan process.

While achieving mode shift is not the primary purpose of 'better streets', as Proposal 83 [82] sets out, 'better streets' will make it easier for cyclists, pedestrians and disabled people to get about, thereby encouraging the greater use of non-car modes. TfL recommends no changes.

TfL Recommendations

No changes

26. Improving Noise impacts

Section 5.18 of the Public Draft MTS describes the approach to improving the noise impacts of transport in London. Policy 16 and Proposals 85 to 87 take this approach forward.

Analysis of responses

Thirty one stakeholders commented on issues relevant to this section. These were:

Association of International Courier and Express Services, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Environmental Health (CIEH), Community Transport Association, Corporation of London, Friends of Capital Transport Campaign, Heathrow Airport Limited, London Borough of Barking & Dagenham, London Borough of Croydon, London Borough of Hackney, London Borough of Havering, London Borough of Lambeth, London Borough of Newham, London Borough of Redbridge, London borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London City Airport., London Civic Forum, London Forum of Amenity and Civic Societies, London Primary Care Trusts, London Visual Impairment Forum, RAC Foundation, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Royal Parks, Sustrans and Westminster City Council.

Comments on noise impacts from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

Mode

- Concern that further measures are needed to deal with noise from public transport
- Concern that traffic reduction is needed if there is to be a reduction of noise transport
- Concern that noise from taxis needs to be addressed further in the MTS

Impact of noise

- Suggested that noise proposals should be targeted at dwellings and people
- Comment that it is difficult to ascertain the impacts of noise on health

Other

- Supports the measures in the draft MTS
- Concern the proposals in the MTS are not sufficient to tackle noise from transport
- Concern that measures to reduce the impacts of noise should not hinder business

TfL Response

Mode

Proposal 86 [85] seeks to reduce noise from public transport and TfL considers that no further changes are necessary.

Delivery of the MTS will lead to a mode shift away from private vehicles and a number of proposals will lead to reduced noise from traffic, including Proposal 102 [101] (smoothing traffic flow) which reduce the noise from idling vehicles and Proposal 105 [104] to encourage the uptake of electric vehicles. It is considered that traffic reduction is not necessarily needed to reduce noise from transport. MTS Proposal 88 [87] seeks to reduce noise from professional drivers. Taxi drivers are professional drivers, therefore TfL recommends no change.

Impact of noise

TfL accepts that the most significant noise impacts are on dwellings and people, therefore TfL recommends changes to Proposal 86 [85] so measures are targeted at dwellings and people.

Noise is known to be an irritant and can reduce quality of life, for example through disturbed sleep. While TfL accepts that it can be difficult to precisely ascertain the impacts, it is an issue that needs to be addressed to meet the wider objectives of the MTS. TfL recommends no change.

Other

Support is noted and welcomed.

It is considered that Proposals 86 to 88 [85 to 87] will not hinder business as they are not prescriptive; indeed proposals to smooth traffic flow will have economic benefits. TfL recommends no change.

TfL Recommendations

Amend Proposal 85 to clarify the importance of noise impacts on dwellings and people
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27. Air Quality

Section 5.19 of the Public Draft MTS describes the approach to improving air quality in London. Policy 15 and Proposals 25, 90, 91, 92, 93, 94, 102, 104, 107, 112, 128 and 129 take this approach forward.

Analysis of responses

Thirty-three stakeholders commented on issues relevant to this section. These were:

British Vehicle Rental and Leasing Association, Campaign for Better Transport, Campaign for Clean Air in London, Campaign to Protect Rural England, Community Transport Association, Corporation of London, Energy Saving Trust, Environment Agency, Friends of the Earth, Jenny Jones AM, Living Streets, London Assembly, London Borough of Camden, London Borough of Croydon, London Borough of Hackney, London Borough of Lambeth, London Borough of Newham, London Borough of Redbridge, London Borough of Southwark, London borough of Sutton, London Borough of Waltham Forest Council, London Civic Forum, London Councils, London Forum of Amenity and Civic Societies, London Primary Care Trusts, London Sustainable Development Commission, North West London Hospitals NHS Trust, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Royal Parks, South East England Development Agency, The Crown Estate and Westminster City Council.

Comments on air quality from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. In the email and letter responses received from members of the public, 16 per cent of respondents made comments about “the environment/ climate change”, as did 11 of the 55 organisations who made open responses. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised by stakeholders:

Support

- Support the proposed approach, policies and proposals

Alternative approaches / extra measures

- More needs to be done to address taxi emissions
- More needs to be done to address emissions from idling buses
- More needs to be done to address tyre and brake wear

- More information should be included, such as on road closures and local measures
- Believe that air quality can be improved through smarter travel choices
- Suggest additional local measures or hotspots in need of targeted action
- Present alternative approaches to improve air quality, including a greater focus on Londonwide activity, a greater focus on road traffic emissions, the use of compulsory measures rather than incentives
- Concern about difference between modelled air emission reductions and current monitored trends, especially for NO₂, and emphasise importance of replacing vehicles rather than abating them because of potential impact on emissions of retrofit equipment

Low emission zones

- Concern about the potential impact of deferring the extension of LEZ to include LGVs and minibuses on air quality
- Call for the case for a central London LEZ to be reconsidered
- Oppose the Mayor's proposals to support boroughs in developing their own local low emission zones or believed that Londonwide standards would be needed to ensure consistency between local low emission zones

Western extension

- Concern about the potential impact of removing the Western Extension of the Congestion Charging zone on air quality

Aviation / airports

- Concern that only Heathrow was mentioned in terms of aviation contribution to poor air quality and noted that City Airport is also an issue
- Improving public transport access to Heathrow will reduce air quality pollutant emissions

Human health

- Highlight risks to humans of exposure to poor air quality

Impact on air pollutants / EU limit values and delivery

- The strategy does not do enough to reduce air quality pollution or meet EU limit values. Air quality should be more of a priority with TfL taking a stronger lead and that earlier action should be taken
- Contingency plans should be in place if the Government fails to get EU limit value extension

- Funding needed to be secured for the air quality measures outlined in the Strategy

TfL Response

It should be noted that the air quality section of the PD MTS has been developed in parallel with the Mayor's Air Quality Strategy (MAQS). It is appropriate that the Mayor's Air Quality Strategy contains the detail about air quality measures and only an overview be provided in the MTS. Stakeholder comments on the MTS have been shared with colleagues preparing the Mayor's Air Quality Strategy; many of these comments will be addressed there directly. The emerging Mayor's Air Quality Strategy has been published for public and stakeholder consultation (closing 21 June 2010), giving stakeholders an additional opportunity to comment. The draft MAQS contains greater detail, which many stakeholders requested.

Support

TfL notes support for the approach to improving air quality set out in the MTS.

Alternative approaches / extra measures

In developing the draft Mayor's Air Quality Strategy and the air quality section of the MTS, there has been the opportunity to take a holistic view and identify the most effective ways of improving air quality in London to meet EU limit values and protect human health. The PD MTS sets out the preferred approach, which is to act proportionately, securing improvements by using incentives first. However, it is accepted that additional action is required and a number of 'compulsory' measures are included in the PD MTS, including an extension of the Low Emission Zone to include a NO_x standard for HGVs, buses and coaches from 2015 (Proposal 45 [44]).

TfL considers that the package of measures included in the draft Mayor's Air Quality Strategy and PD MTS will deliver necessary air quality improvements in the period of the plan.

The PD MTS sets out ambitious proposals to address taxi emissions by introducing new age-based limits. TfL already requires its bus operators to ensure that bus drivers do not leave their engines running when they are at bus stands. The draft Mayor's Air Quality Strategy sets out proposals for a Londonwide 'No Idling Zone', which will further address idling, particularly from taxis, coaches and buses.

It is agreed that more needs to be done to address tyre and brake wear, but at present the mechanisms to do this effectively are not in place. There are currently no regulations to address tyre and brake wear in the same way that exhaust emissions are regulated by Euro standards. Consequently, working closely with the Government and the European Union to support technological solutions to address tyre and brake wear is appropriate, as set out in Proposal 93 [92] of the MTS.

Three interconnected areas which are most at risk of exceeding EU limit values for PM₁₀ in 2011 have been identified. The MTS states that tackling poor air quality on a local basis can be an effective way of improving air quality, especially in the short-term. However, it is agreed that this is only a part of the solution and Londonwide action to address sources of emissions is also required. Such action is set out in the MTS (Proposals 91, 92, 93 and 95 [90, 91, 92 and 94]) with further detail provided in the draft MAQS.

The PD MTS recognises that there are other locations which have comparatively poor air quality for both PM₁₀ and NO₂ and it will be important that boroughs undertake action at local hotspots that they have identified through their local monitoring. Through TfL, the Mayor will work with the boroughs to identify these additional locations and provide support to tackle them through the LIPs process, as set out in the draft MAQS.

Borough suggestions for additional local measures are welcomed. The list of local measures contained within the PD MTS is not meant to be exhaustive. Any measures undertaken to improve air quality at the hotspots would be developed in close partnership with the relevant London boroughs. Further information on local measures, including proposals to close roads, is included in the draft MAQS.

The PD MTS sets out how mode share for public transport, walking and cycling can be increased, for example by improving public transport, promoting smarter travel and investing in cycling infrastructure. Proposals to smooth the flow of traffic will reduce emissions from those who continue to drive (Proposal 30). It sets targets for walking and cycling supported by proposals for Cycle Hire, Cycle Superhighways and to develop cycle freight, as well as to achieve increased levels of walking. TfL agrees that these changes have significant potential to improve air quality in London.

The Mayor, through TfL, will continue to provide leadership on air quality issues. The PD MTS sets out ambitious proposals to reduce emissions from buses, taxis and other public sector vehicles, ensuring TfL sets an example. The Mayor has also proposed action to further address emissions from LGVs, minibuses, HGVs, buses and coaches through the Low Emission Zone. Locally, the Mayor will continue to provide support to boroughs through the LIPs and local air quality management processes.

Concerns expressed about a divergence between modelled air emission reductions and current monitored trends, especially for NO₂, are acknowledged in the PD MTS. However, the approach set out in the Strategy remains the correct one. It is widely accepted that reducing emissions improves air quality. It is also agreed that the relationship between emissions and concentrations is complex and non-linear. While TfL accepts that using retrofit equipment to reduce emissions has its limitations in some circumstances, the use of such equipment continues to deliver improvements in air quality while minimising compliance costs especially for small businesses.

Low emission zones

The proposal to defer the extension of LEZ to include LGVs and minibuses is addressed in the 'London Low Emission Zone' section of this report.

The PD MTS provides that the Mayor may consider introducing tighter standards in particular locations (e.g. Central London) in Proposal 95 [94]. This would likely be in response to emerging air quality challenges, and subject to the effectiveness of the other measures set out in the PD MTS and draft MAQS and be dependent on a clear statement of the expected benefits and other impacts of such a scheme.

Linked to a central London LEZ scheme, a number of stakeholders suggested that a system of enforcement based on the Berlin Low Emission Zone would be appropriate for London. TfL has considered this approach and further work is required to assess its potential role in London.

The Local Transport Act 2008 gives boroughs the powers to establish their own local emission zones. However, in London these need to be in conformity with the MTS so the inclusion of Proposal 94 [93] enables boroughs to establish them should they so wish. This is in keeping with the Mayor's commitment to devolving powers where possible to boroughs. TfL recommends that further text is added to section 5.21.7 [5.19.7] to clarify that the Mayor would work with the boroughs to establish guidelines for introducing any local low emission zones should there be interest in doing so. This approach would help to ensure Londonwide interoperability and minimise compliance costs.

Western extension

The air quality impacts of the removal of the Western Extension are considered under the 'Western Extension' section of this chapter.

Aviation / airports

TfL accepts that addressing air pollutant emissions from aviation sources is important and the Mayor's Air Quality Strategy sets out in more detail how a further shift towards public transport to access Heathrow Airport will be achieved. BAA has supported the Heathrow Express, Crossrail and Airtrack as well as providing general funding for additional bus services (including free bus travel within the Heathrow site), but further steps are required. The draft MAQS considers City Airport in greater detail.

Human health

It is clear that poor air quality has a major impact on human health, particularly for vulnerable members of society including elderly people, children and people suffering from respiratory conditions. The policies and proposals set out in the MTS

and the draft Mayor's Air Quality Strategy will reduce the adverse health impacts of poor air quality. More information on health impacts is provided in the draft MAQS.

Impact on air pollutants / EU limit values

The PD MTS contains ambitious proposals to reduce emissions from buses, taxis and other public sector vehicles, ensuring TfL sets an example. The MTS has also proposed action to further address emissions from LGVs, minibuses, HGVs, buses and coaches through the Low Emission Zone. Locally, the Mayor will continue to provide support to boroughs through the LIPs and local air quality management processes. Further information on funding of air quality measures is set out in the Mayor's Air Quality Strategy.

TfL considers that the MTS and the emerging Mayor's Air Quality Strategy will achieve significant reductions in emissions of air pollutants, especially from road transport. The measures laid out in this Strategy increase the confidence that all parts of London will meet the EU limit values for PM₁₀ by 2011. Pre-compliance for proposals relating to the LEZ and taxi age limits plays an important role in this.

NO₂, meanwhile, is a national issue requiring further action from central Government. The policies in the MTS and draft Mayor's Air Quality Strategy provide for encouragement to be given to central Government in developing a package of measures which together with the measures in this strategy should meet the limit value in London. Consequently, the Strategy will be fit for purpose and reflects the high priority that the Mayor attaches to improving London's air quality.

TfL Recommendations

Add text to Section 5.19.7 to clarify that guidelines would be developed for local low emission zones

The draft Mayor's Air Quality Strategy provides further information on proposed measures to improve air quality in London

28. London Low Emission Zone

Section 5.19.7 of the Public Draft MTS describes the next and potential future phases of the London Low Emission Zone (LEZ) and the proposed deferral of the light goods vehicles (LGVs) and minibuses LEZ phase from 2010 to 2012. Proposal 94 takes this forward.

Analysis of responses

Twenty-three stakeholders commented on the Low Emission Zone. These were:

Association of British Drivers, Campaign for Clean Air in London, Chartered Institution of Highways and Transportation, Community Transport Association, Corporation of London, Federation of Small Businesses, Friends of the Earth, Jenny Jones AM, Living Streets, London Borough of Camden, London Borough of Hackney, London Borough of Islington, London Borough of Tower Hamlets, London Chamber of Commerce and Industry, London Forum of Amenity and Civic Societies, NHS Tower Hamlets, RAC Foundation, Road Haulage Association, Royal Borough of Kingston upon Thames, Society for Motor Manufacturers and Traders, TSSA, TUC and Valerie Shawcross AM.

The questionnaire accompanying the draft MTS for public consultation did not include a specific question on the deferral of the LEZ LGVs and minibuses phase. Representations on the LEZ from the public, businesses and other organisations made up less than one per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

- Support the deferral of LEZ LGVs and minibuses phase
- Oppose the deferral of LEZ LGVs and minibuses phase
- Impact of deferral on air quality and meeting EU limit values
- Operator compliance and impact on small businesses/ charities
- Consideration of potential future phases of the LEZ scheme including a Berlin-style central London low emission zone targeting all vehicles with tighter emissions standards
- Need for inter-operability of local low emission zone schemes

TfL Response

Support the deferral of LEZ LGVs and minibuses phase

TfL notes the support for the proposal to defer the implementation of the LEZ LGVs and minibuses phase from October 2010 to 2012.

Oppose the deferral of LEZ LGVs and minibuses phase

The public draft MTS describes the rationale for the proposed deferral of the extension of the LEZ to LGVs and minibuses from 2010 to 2012 (section 5.19.7 [5.21.7]). Deferring the LEZ LGVs and minibuses phase to January 2012 provides additional time for operators to comply with the emission standard and mitigate some of the potential impacts for small businesses. TfL considers that the draft MTS balances the economic benefits for operators of deferring the LGVs and minibuses LEZ phase with the loss of any air quality and associated health benefits that would have been realised in 2010 and 2011. Therefore, no change is recommended.

Impact of deferral on air quality and meeting EU limit values

TfL has undertaken further investigation of the emissions reductions likely to result from the introduction of the LEZ LGVs and minibuses phase in 2012. TfL estimates that extending the LEZ to LGVs and minibuses in 2012 will reduce emissions of PM₁₀ by around 8 tonnes and emissions of NO_x by around 100 tonnes in 2011 through pre-compliance benefits. These are important in the context of meeting the 2011 EU daily limit values for PM₁₀. TfL therefore recommends a change to the public draft MTS to reflect the updated investigations into the air quality impacts of this LEZ phase.

The contribution of the LEZ LGVs and minibuses phase, through operators taking early action to comply with the emission standard, to meeting the 2011 EU target for PM₁₀ is considered further in this report in the section on air quality.

The Mayor's Air Quality Strategy contains a range of measures proposed to ensure the achievement of the EU PM₁₀ targets by 2011 and associated health benefits for London, of which the extension of the LEZ to LGVs and minibuses is an important element.

Operator compliance and impact on small business/ charities

The draft MTS takes into account the economic impact of complying with the LEZ emissions standards for small businesses and charities in the proposal to defer the implementation of the LGVs and minibuses phase. Delaying the implementation of this phase will allow time for the current economic situation to improve and provide additional time for smaller operators to take the necessary steps to comply. TfL considers MTS measures to be effective with regard to the impact on operators of the LEZ LGVs and minibuses phase, therefore no change is recommended.

Future LEZ phases

Potential future phases of the LEZ scheme, including consideration of the case for a central London LEZ based on the Berlin environmental zone, are dealt with in this report in the theme on air quality.

Inter-operability of local low emission zones

The inter-operability of local low emission zones is dealt with in this report in the theme on air quality.

Next steps

TfL will need to consult with the public and stakeholders on a variation order to the *Greater London Low Emission Zone Charging Order 2006* (the Scheme Order) to defer the extension of the LEZ to LGVs and minibuses to 2012.

The public and stakeholder consultation on the variation order to change the start date of the LEZ LGVs and minibuses phase will be supported by further analysis of the impacts of the deferral of this phase.

TfL Recommendations

Update the estimates of the emissions reductions from the deferred LEZ phase for LGVs and minibuses to reflect revised emissions modelling, in section 5.19.7.

29. Reducing CO₂ emissions and adapting to climate change

Section 5.20 of the Public Draft MTS sets out the Mayor's Policies and Proposals for reducing carbon dioxide (CO₂) emissions from transport in London. Policy 24 and proposals 95 – 108 inclusive respectively detail the Mayor's target and the actions the Mayor proposes to take to reach his target. Proposals to reduce CO₂ emissions from transport in London also appear throughout the document. In particular, the following proposals in the MTS will contribute towards reducing transport related CO₂ emissions in London: 1, 2, 4, 7, 8, 9, 17, 23, 25, 30, 33, 45, 46, 47, 49-54, 56-61, 68, 71, 72, 82, 83, 84, 90, 91, 92, 95-108, 112, 114-18, 124, 126, 128 and 129.

Section 5.21 of the draft MTS describes the Mayor's approach to adapting to climate change. Policy 25 and Proposals 109 – 113 inclusive take this approach forward.

Analysis of responses

Eighty-eight stakeholders commented on issues relevant to this section. These were:

ASLEF, Association for Consultancy and Engineering (ACE), Association of British Drivers, Association of International Courier and Express Services, Aviation Environment Federation (AEF), Better Bankside, British Telecom, British Vehicle Rental and Leasing Association, Campaign for Better Transport, Campaign to Protect Rural England, Central London Freight Quality Partnership, Chartered Institute of Environmental Health (CIEH), Chartered Institute of Logistics & Transport UK, Cllr Liz Santry – Haringey, Cllr Rahman Khan – Haringey, Community Transport Association, Corporation of London, Department for Transport, Energy Saving Trust, Enfield NHS Trust, English Heritage, Environment Agency, Federation of Small Businesses, Friends of Capital Transport Campaign, Friends of the Earth, Guide Dogs for the Blind Association, Heathrow Airport Limited, Jenny Jones AM, Licensed Private Hire Car Association (LPHCA), Living Streets, London Borough of Barking & Dagenham, London Borough of Brent, London Borough of Bromley, London Borough of Camden, London Borough of Croydon, London Borough of Greenwich, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Merton, London Borough of Newham, London Borough of Redbridge, London Borough of Richmond upon Thames, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Civic Forum and Youth Campaign for Better Transport, London Councils, London Cycling Campaign, London Disability Cycling Forum, London First, London Forum of Amenity and Civic Societies, London Liberal, London TravelWatch, London Visual Impairment Forum, LSDC, NHS Lambeth, NHS Tower Hamlets, North West London

Hospitals NHS Trust, Olympic Delivery Authority (ODA), Park Royal Partnership (PRP), RAC Foundation, RNIB, Roadpeace, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Society of Motor Manufacturers and Traders Ltd (SMMT), Sustrans, SWELTRAC, The Chartered Institution of Highways and Transportation, The Crown Estate, Transport for All, Transport Planning Society, TSSA, TUC, Uklpg, Unite, Valerie Shawcross AM and Westminster City Council.

Question 4 of the public questionnaire invited respondents to make any additional comments; one per cent made a comment on CO₂ emissions. The issues raised in the public responses were broadly similar to those raised by stakeholders. In the open responses from the public, 18 per cent of respondents made a comment on this issue, and the majority of these responses suggested that the proposed CO₂ emissions reductions required further action. Thirteen of the 55 organisations making an open response made a comment on this theme and the majority supported the Mayor's target for CO₂ emissions reduction while questioning whether the proposals set out would be sufficient to achieve this.

Issues Raised

The following issues were raised:

- Definition of the Mayor's target for CO₂ emissions reduction by 2025
- Action required to meet the Mayor's CO₂ emissions reduction target
- Interim CO₂ emissions targets in the period to 2025
- Encouraging and incentivising the uptake of electric/low carbon vehicles
- Provision of electric vehicle recharging points
- The use of low carbon fuels/energy
- Smoothing traffic flow
- Reducing CO₂ emissions from Mayoral vehicle fleets
- Road user charging to reduce CO₂ emissions
- Changing driver behaviour in order to reduce CO₂ emissions
- Adapting to climate change

TfL Response

In comparison to other global cities, the target of a 60 per cent reduction in CO₂ emissions in Greater London in the period 1990 – 2025 is amongst the most ambitious. Strong stakeholder support for a challenging CO₂ emissions reduction target is found in the responses.

Definition of the Mayor's target for CO₂ emissions reduction by 2025

The CO₂ emissions reduction contribution required from the transport sector to the Mayor's London wide target assumed in the draft MTS is consistent with the Climate Change Action Plan (CCAP) of 2007. The Mayor's Climate Change Mitigation and

Energy Strategy (CCMES) was published for London Assembly and Functional Body consultation on 9 February 2010 and has replaced CCAP in defining the Mayor's target for CO₂ emissions reduction. The draft CCMES maintains the London wide target for CO₂ emissions reduction by 2025 as in CCAP, however the relative contribution expected from the three emissions sectors of 'homes', 'workplaces' and 'transport' has changed. In comparison to CCAP, the draft CCMES identifies greater potential to reduce CO₂ emissions from the 'homes' sector. Therefore, the relative contribution required from 'workplaces' and 'transport' reduces accordingly. Given a degree of uncertainty as to the CO₂ emissions reductions that will be achieved in each sector, it is recommended that the 2025 transport sector CO₂ emissions required to contribute to the Mayor's target be presented as a range on a revised Figure 61 [58]. This approach will provide an accurate indication of the level of emissions reduction required, with the intention of narrowing the range as clarity is gained on the potential to reduce CO₂ emissions across the three identified sectors.

CCAP and the PD MTS use a forward projection of 2004/05 London Energy and Greenhouse Gas Inventory (LEGGI) data to estimate 2006 CO₂ emissions. The draft CCMES presents LEGGI data from the 2006 survey and states the intention to move to 2008 LEGGI data when available. 2008 LEGGI was published in the days following publication of the draft CCMES. Therefore, it is recommended that Figure 28 is updated with 2008 LEGGI CO₂ emissions data to ensure consistency with CCMES.

Action required to achieve the Mayor's CO₂ emissions reduction target

In October 2009 the Committee on Climate Change (CCC) published a progress report that called for an extended level of Government ambition to reduce greenhouse gas emissions beyond the level required by the legislated 'interim' national carbon budgets. The draft CCMES has applied the CCC scenario of extended Government ambition across all three emissions sectors. It is recommended that Figure 61 [58] is revised to reflect the impact of an extended level of Government ambition as set out in the CCC report.

In a scenario of extended Government ambition the draft CCMES projects an approximate 57 per cent reduction in London's CO₂ emissions by 2025 from a 1990 base, compared to the Mayor's target of 60 per cent. The draft CCMES proposes that the CCMES be updated at least every 5 years. In view of the uncertainty as to the distribution of CO₂ emissions reduction across emissions sectors and the dynamic nature of technologies and policies to reduce CO₂ emissions in the MTS and CCMES, it is not recommended that the MTS speculates as to how the remaining CO₂ emissions gap relating to the Mayor's target could be filled. It is recommended that a reference to the CCMES be added to the MTS.

The package of Mayoral initiatives set out in the PD MTS to mitigate climate change has been balanced to ensure affordability and avoid undue disruption. The MTS and CCMES are consistent in the definition of Mayoral actions to reduce transport related

CO₂ emissions in London. TfL considers that the MTS, together with further Government action, is likely to make the required contribution to achieve the Mayor's CO₂ emissions reduction target. Therefore, no alteration to the measures set out in MTS to reduce transport related CO₂ emissions is recommended.

Interim CO₂ emissions targets in the period to 2025

A number of stakeholders commented that interim targets for CO₂ emissions reductions would be helpful in the period to 2025 in order to monitor progress. The draft CCMES proposes interim targets for total London transport related CO₂ emissions for 2015 and 2020. However, technology and policy to reduce CO₂ emissions are developing rapidly. In order to retain flexibility to pursue CO₂ emissions reduction in the most effective emissions sectors, TfL does not recommend the introduction of interim targets for individual emissions sectors.

Figure 8.4 in the draft CCMES shows the anticipated trajectory of transport related CO₂ emissions to 2025. It is recommended that a chart based on the same data is added to the MTS, but without formal interim targets for the transport sector (new Figure 62 in MTS).

Figure 8.4 of the PD MTS shows transport related CO₂ emissions in London on a modal basis. There were some suggestions for CO₂ emissions reductions targets on a modal basis. Such targets are considered overly detailed for the MTS, particularly given uncertainty as to the rate of uptake of low carbon vehicle technologies and fuels in individual modes. However, in some cases, detail is provided on uptake of low carbon vehicles, for example, all new buses from 2012 to be hybrid. No changes to the PD MTS are recommended.

Encouraging and incentivising the uptake of electric / low carbon vehicles

There was strong stakeholder support for London's electric vehicle (EV) revolution, as well as acknowledgment of the broad support the PD MTS provides for low carbon vehicles. A small number of responses stated that there might be too much focus on EVs. However, the PD MTS wording provides broad support for all potential solutions to decarbonise transport and identifies EVs as just one particularly promising opportunity. Therefore, no change is recommended.

Some stakeholders cautioned that promotion of EVs and other low carbon cars must not conflict with congestion, road safety, parking and/or mode shift to walk, cycle and public transport objectives. TfL accepts this point and recommends that Proposal 103 [102] be revised to read "encourage a switch from conventional to low CO₂-emitting road vehicles" from the previous "encourage the purchase and/or use of low CO₂-emitting road vehicles".

A small number of stakeholders raised concerns regarding the impact of EVs on road safety, particularly for those with visual impairments, due to lower noise emissions of EVs in comparison to conventional vehicles. It is acknowledged that

adjustment will be required from all road users, particularly pedestrians as a consequence of mass market uptake of EVs. However, lower noise levels should not detract from the safety of crossing the road at controlled crossings. On balance no changes are recommended to the draft MTS to reflect this point.

Provision of electric vehicle recharging points

Broadly, stakeholders recognised the need for a network of EV recharging points in London, and agreed that there should be consistency in the standards used across the network. Some stakeholders were concerned that EV charging infrastructure could have a detrimental impact on the streetscape and that EV recharging point technology will develop rapidly and therefore TfL must be cautious to avoid installing soon-to-be obsolete charging equipment. The above points are addressed in more detail in London's Electric Vehicle Infrastructure Strategy that was published in December 2009. TfL recommends that a reference to the London Electric Vehicle Infrastructure Strategy be added to the MTS as a signpost to further information. It also recommends that text be added to section 5.22.7 [5.20.7] to reflect the potential conflict between the 'better streets' initiative and the development of a Londonwide network of EV recharging points.

The use of low carbon fuels / energy

A small number of stakeholders suggested that the use of EVs should be linked explicitly to low or zero carbon electricity generation. The MTS contains a reference to encouraging recharging EVs at night, thus avoiding additional demand on the National Grid at peak times that may necessitate the use of less carbon efficient generating capacity. In line with Government guidance, it is not proposed to link low carbon electricity supply directly to one use, to avoid simply assigning less efficiently generated electricity to other uses and not reducing overall CO₂ emissions. However, a combination of proposals for decentralised electricity generation in London (as in the draft CCMES) and nationwide decarbonisation of the National Grid are anticipated to result in significantly reduced CO₂ emissions associated with electricity consumption in the period to 2025. Therefore, no changes are recommended in relation to this issue.

At present, there is no consensus on the extent to which bio-fuels could replace fossil fuels. This is due to significant uncertainty around how far bio-fuels can reduce transport related CO₂ emissions in a sustainable manner (without, for example, competing with land for food crops). A limited number of stakeholders called for the MTS to make a stronger case for the use of bio-fuels. However, given current uncertainty it is not considered appropriate to move beyond the EU target of 10 per cent of transport energy from renewable sources, to which the PD MTS makes reference. Production of bio-methane from organic waste was identified as a particular opportunity. The production of fuels in such a manner is limited to the availability of organic waste and it is considered that CCMES is better placed to assess this potential and decide which sector the energy is best allocated to (e.g.

bio-methane could just as well be used in a combined heat and power plant for a building than for transport purposes). Therefore, no changes are recommended.

A few stakeholders suggested that more could be done to promote Liquid Petroleum Gas (LPG) and to set renewable energy targets for all Mayoral fleets. The use of LPG does not necessarily result in lower CO₂ emissions than conventional fossil fuels if the LPG is originally sourced from fossil fuels. Therefore, current references to bio-fuels are considered adequate to support sustainable LPG. Given uncertainties in the quantities of bio-fuels that may be available in the future, it is not considered appropriate to define targets for individual modes. For example, it may in the future be considered appropriate to concentrate use of bio-fuels in modes with little alternative to the use of high density liquid hydrocarbons, e.g. aviation and shipping. Therefore, fewer bio-fuels may be available for modes such as cars where alternative fuels types such as electricity or hydrogen exist. No changes are recommended as a result of these comments.

Smoothing traffic flow

Mixed stakeholder responses were received as to the effectiveness of smoother traffic flow as an initiative to reduce transport related CO₂ emissions. The MTS explains the concept of smoothing traffic flow in section 5.6.3 [5.6.2]. The impact of smoother traffic flow on CO₂ emissions from road vehicles is explained in more detail in section 5.22.6 [5.20.6] and Proposal 102 [101]. TfL recommends no change to the PD MTS relating to this issue.

Reducing CO₂ emissions from mayoral vehicle fleets

There was strong support in the consultation responses for the introduction and wider roll-out of low carbon vehicles in the fleets either directly controlled by the Mayor or regulated by the Mayor. However, eleven stakeholders were also of the opinion that more could be done to reduce CO₂ emissions from vehicle fleets controlled by the Mayor. The PD MTS contains the proposal for all new buses to enter the London fleet from 2012 to feature hybrid engine technology. It is not recommended that set further targets for vehicles fleets controlled or regulated by the Mayor are set.

Road user charging to reduce CO₂ emissions

Some stakeholders stated the opinion that some form of road user charging or other significant policy intervention to reduce road vehicle usage would be required to meet the Mayor's CO₂ emissions target. Data in the draft CCMES makes it clear that road user charging is not a prerequisite in meeting the Mayor's CO₂ emissions target, but that the option must be kept open for review over the longer term. TfL has no further recommendations for changes on this matter, but please also see section in this report on Road User Charging and Proposal 130[129].

Changing driver behaviour in order to reduce CO₂ emissions

Support for encouragement of eco-driving techniques is noted. The CCC scenario of extended Government ambition includes a higher level of impact from eco-driving, therefore a reference to the CCC scenario of extended Government ambition is recommended to be added to the MTS.

A number of stakeholders made suggestions for further action to improve the efficiency of freight movement, or services such as refuse collection. The draft MTS provides support for initiatives that are detailed in other documents including the London Freight Plan. The current balance of broad support in the MTS and detail in other documents is considered appropriate and no change is recommended.

TfL notes the view that more action is required to raise public awareness of practical feasibility of the emerging generation of low carbon road vehicles. However, motor manufacturers are considered to be better placed to promote the advantages of the new vehicles they will be bringing to market. Therefore, no change to the MTS is recommended.

TfL notes support for the intention to expand car clubs in London.

Climate Change adaptation

A number of stakeholders endorsed the need to take action to adapt to the consequences of climate change and stated support for initiatives to adapt to climate change. Support was noted in particular for the planting of more trees in London, and further detail on this was requested. However, details about the delivery of measures are not considered appropriate for inclusion in the MTS, therefore no alterations are recommended. The Mayor's draft Climate Change Adaptation Strategy (CCAS) was published for public consultation in February 2010. The approach set out in the MTS and the CCAS to adapting London's transport system to anticipated climatic changes is consistent. It is recommended that a reference be added to MTS to the draft CCAS as a reference for further detail on climate change adaptation issues.

Other

A limited number of stakeholders put forward the opinion that no new roads or additional road capacity should be provided. However, such a rigid approach would go against other MTS policies such as accommodating growth, removing severance caused by lack of river crossings in east London and smoothing traffic flow by tackling bottlenecks where there is a net beneficial impact. Therefore, no change is recommended.

Greater levels of mode shift from car to public transport, walking and cycling in order to reduce CO₂ emissions was suggested. Figure 1 in the PD MTS projects significant mode shift from car to lower carbon modes. This level of mode shift is derived from analysis of the impact of PD MTS policies and proposals anticipated through TfL's forecasting tools. Therefore no change is recommended.

Responses stated that there should be stronger reference to the need to integrate land-use and transport planning in order to reduce transport related CO₂ emissions. The London Plan, MTS and EDS joint development process considered alternative land-use scenarios and identified the optimum based on a balanced consideration of objectives. Policy 11 and Proposal 97 [96] in MTS aim to integrate land-use and transport planning and to minimise the need to travel. In view of the respective scope of the three complementary strategies it is considered appropriate that the London Plan provides the appropriate detail on this issue.

TfL Recommendations

To present transport sector 2025 CO₂ emissions level required to contribute to the Mayor's target as a range on a revised Figure 58

To update relevant sections of the draft MTS to ensure consistency with the draft Mayor's Climate Change Mitigation and Energy Strategy (CCMES)

Revise Figure 58 to reflect the impact of an extended level of Government ambition as set out in the Committee on Climate Change report

Remove references as to how the CO₂ policy gap could be filled from Figure 58

Update Figure 28 with 2008 London Energy and Greenhouse Gas Inventory (LEGGI) CO₂ emissions data

Add a reference to the Mayor's draft Climate Change Mitigation and Energy Strategy in section 5.21

Add a chart to display the trajectory of transport related CO₂ emissions to 2025, using the same data as Figure 8.4 in the draft CCMES (new Figure 62 in MTS)

Revise Proposal 102 of the Public Draft MTS to read "encourage a switch from conventional to low CO₂-emitting road vehicles" from the previous "encourage the purchase and/or use of low CO₂-emitting road vehicles"

It is recommended that a reference to the London Electric Vehicle Infrastructure Strategy be added

It is recommended that text be added to ensure that the development of a London wide network of electric vehicle recharging facilities is undertaken in a consistent manner to the 'better streets' initiative

It is recommended that a reference be added to the draft Mayor's Climate Change Adaptation Strategy as a pointer for further detail on climate change adaptation issues

30. Public transport and road user information

Sections 4.5.2 and 5.22 of the Public Draft MTS describe the approach to better journey planning; this is set out in Policy 21 and Proposal 114 takes this forward. With regard to enhancing information within the context of accessible transport, Section 5.9.2 describes the approach and Proposal 41 takes this forward.

Please also see the sections in this report on 'Transport Opportunities for All', 'Making Walking Count', 'the Cycling Revolution' and 'Smarter Travel.'

Analysis of responses

Thirty-five stakeholders commented on issues relevant to this section. These were:

Age Concern London, British Telecom, CBI, Chartered Institute of Environmental, Health (CIEH), Corporation of London, Energy Saving Trust, Hertfordshire County Council, Institute of Civil Engineers (ICE), London Borough of Bexley, London Borough of Brent, London Borough of Croydon, London Borough of Havering, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Newham, London Borough of Redbridge, London Borough of Tower Hamlets, London Borough of Wandsworth, London Civic Forum and Youth Campaign for Better Transport, London First, London Forum of Amenity and Civic Societies, London TravelWatch, London Visual Impairment Forum, National Express East Anglia and c2c, NHS London, North West London Hospitals NHS Trust, Park Royal Partnership (PRP), RAC Foundation, Royal Borough of Kensington & Chelsea, Society of Motor Manufacturers and Traders Ltd (SMMT), SWELTRAC, Transport for All and Westminster City Council.

The public questionnaire included a question about which measures would most benefit information, which was answered by 71 per cent of respondents (82 per cent of responses via the web and 63 per cent of paper responses). The measure which was most often selected was "improving the travel information assistance provided at stations" (33 per cent of respondents). Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 8 per cent of respondents made a comment with regard to information, and 5 per cent commented on travel planning and guidance to assist people in deciding how to travel. As is reflected in the issues raised by stakeholders, respondents welcomed proposals to improve travel information and made specific suggestions to achieve this.

Issues raised

The following is a list of issues raised:

- Need to involve boroughs in local implementation and comments on local matters
- Clear information and variety of formats welcomed and must remain mindful of the needs of older people, disabled people and those without internet access
- Ideas for better information provision, including on night-time travel
- Caution about the capacity to effect behavioural change through better information
- Lack of mention of public Rights of Way
- Welcome proposals to improve journey planning information

TfL Response

Borough involvement

It is agreed that there will need to be discussion with boroughs on how to implement specific measures locally, and Proposal 115 [114] indicates that TfL will work with the boroughs and others to do this.

Information formats

With regards to ensuring information is available in suitable formats to enable greater accessibility, this is addressed in Proposal 41 and is included in the Accessibility Implementation Plan (Section 7.2). Proposal 115 [114] includes a commitment to provide customers with a range of paper-based information.

Technology and night-time travel information

Suggestions were made for improvements to journey planning tools, including more use of mobile phone technology to provide real-time information for drivers and pedestrians, and better information at bus stops and at interchanges. Measures for improved customer information are set out in Proposal 115 [114]. Proposal 81 [80] addresses the issue of providing information about safer travel options at night.

Behavioural change

Respondents noted that information can play a role in helping people to choose more sustainable modes but cautioned that this alone may not engender significant behaviour change. TfL acknowledges this and the public draft MTS sets out additional measures to encourage cycling in Proposals 51-58 [50-57] and walking in Proposals 59-62 [58-61] as well as demand management measures including Smarter Travel and the potential use of pricing incentives in Proposals 116 [115], 130 [129].

Public Rights of Way

One respondent indicated that the draft MTS should include reference to Public Rights of Way. These are considered a borough rather than a Mayoral responsibility and therefore no change is recommended.

TfL notes support for the proposals.

TfL Recommendations

No recommendations

31. Smarter Travel initiatives

Section 5.22.1 and 5.22.2 of the Public Draft MTS describe the approach to encouraging smarter travel and journey planning. Policies 8, 10, 11, 17 and Proposals 114-115 take this approach forward.

Analysis of responses

Fifty-nine stakeholders commented on issues relevant to this section. These were:

Better Bankside, British Vehicle Rental and Leasing Association, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Environmental Health (CIEH), Community Transport Association, Corporation of London, CTC, Energy Saving Trust, Enfield NHS Trust, Environment Agency, Friends of Capital Transport Campaign, Friends of the Earth, Institute of Civil Engineers (ICE), Living Streets, London Assembly, London Borough of Barking & Dagenham, London Borough of Barnet, London Borough of Bromley, London Borough of Camden, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hackney, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Lambeth, London Borough of Lewisham, London Borough of Newham, London Borough of Redbridge, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Civic Forum, London Councils, London Cycling Campaign, London Liberal Democrats, London TravelWatch, Network Rail, NHS Lambeth, NHS London, Olympic Delivery Authority (ODA), Park Royal Partnership (PRP), Port of London Authority, The Ramblers, RAC Foundation, Roadpeace, Royal Borough of Kensington & Chelsea, Royal Borough of Kingston upon Thames, Society of Motor Manufacturers and Traders Ltd (SMMT), Sustrans, SWELTRAC, South London Partnership, TSSA, Valerie Shawcross AM, West London Partnership and Westminster City Council.

Five per cent of respondents to the open responses section of the public questionnaire included a comment on MTS proposals that cover the provision of travel planning and guidance to assist people in deciding how to travel. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

- The impact of smarter travel on air quality
- Smarter travel initiatives do not focus on long-distance carbon intensive journeys
- Expand car club proposals to include low carbon vehicles
- Awareness of eco-driving
- Not enough attention given to mode shift
- Greater recognition of Smarter Travel Sutton needed
- Working hours / activities

TfL Response

Air quality

The impact of behavioural change on air quality is referenced in the public draft MTS under section 5.21.3 [5.19.3]. In addition, Proposals 92 [91] and 91 [90] identify interventions to help change travel behaviour in order to reduce vehicle emissions. TfL consider MTS measures to be effective with regard to the impact of behavioural change on air quality, therefore no change is recommended.

Carbon intensive journeys

The need to address long-distance carbon-intensive journeys is a national strategic issue and therefore not appropriate for the MTS. Smarter travel initiatives are intended to be implemented locally, and therefore no change is recommended.

Car clubs

The Mayor is committed to encouraging the use of low carbon vehicles within car clubs (Proposal 98 [97]). Although the encouragement of low carbon vehicles within car clubs is anticipated to have a modest effect on reducing emissions, this initiative is also complemented by other strategic proposals, for example, hybrid bus technology (Proposal 25) and will therefore contribute to an overall positive benefit. TfL considers PD MTS measures to be effective with regard to car club interventions.

Eco-driving

Proposal 96 [95] of the PD MTS aims to encourage the awareness and adoption of eco-driving practices, and no further addition is recommended.

Modal shift

It is considered that the PD MTS provides a balanced view on the need for modal shift. This intention is supported by Policy 11. In addition, further support is provided by Proposal 116 [115], which states that the Mayor will use smarter travel initiatives

to facilitate more efficient use of the transport system and achieve modal shift. No change is recommended.

Smarter Travel Sutton (STS)

The PD MTS references the recent annual report from the STS programme and the achievements that have been made as a result of the three year TfL-funded programme; but it is recommended that this is updated.

Flexible working patterns

TfL accepts that working patterns should be taken into consideration when implementing a package of smarter travel measures and recommends that the PD MTS be amended to reflect this.

TfL Recommendations

Amend section 5.22.2 to acknowledge the impact of working patterns
Include an update on the Smarter Travel Sutton programme

32. Freight

Freight and servicing issues apply across a number of modes. Freight is considered throughout the Public Draft Mayor's Transport Strategy, but with particular relevance in the following sections: International and national rail freight (section 5.22); Making better use of rivers and canals for waterborne freight (5.7.5); Managing the road network (5.6), Improving road safety (5.15); Reducing CO₂ emissions from freight delivery (5.20.3); Smarter transport of freight and services (5.22.3); and Parking and Loading (5.24.2).

Analysis of responses

A total of sixty-three stakeholders commented on issues relevant to this section, these were:

ASLEF, Association for Consultancy and Engineering (ACE), Association of International Courier and Express Services, Better Bankside, British Waterways, Campaign for Better Transport, Campaign to Protect Rural England, CBI, Central London Freight Quality Partnership, Chartered Institute of Environmental Health (CIEH), Chartered Institute of Logistics & Transport, Corporation of London, CTC, Federation of Small Businesses, First Capital Connect, Freight Transport Association, Friends of Capital Transport Campaign, Heathrow Airport Limited, Heathrow Hub Limited, Institute of Advanced Motorists (IAM), Jenny Jones AM, Kent County Council, London Borough of Barking & Dagenham, London Borough of Bexley, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Greenwich, London Borough of Hackney, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Newham, London Borough of Redbridge, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth. London Chamber of Commerce and Industry, London City Airport, London Civic Forum, London First, London Forum of Amenity and Civic Societies, London Liberal Democrats, London Thames Gateway Development Corporation (LTGDC), London TravelWatch, National Express East Anglia and c2c, Network Rail, North London Strategic Alliance, Park Royal Partnership (PRP), Port of London Authority, RAC Foundation, Railfuture, Road Haulage Association, Roadpeace, Royal Borough of Kensington & Chelsea, The Crown Estate, Transport Planning Society, TUC, West London Partnership and Westminster City Council.

The public consultation questionnaire included a question about which measures would benefit freight in London, which was answered by 72 per cent of respondents (82 per cent of responses via the web, 65 per cent of paper responses). The measure which was most often selected was "promoting the use of the Thames and other waterways for freight" (49 per cent of respondents). Question 2 of the public questionnaire invited respondents to specify any other measures which they

considered would bring benefit to travelling in London; of those who made a comment here, five per cent made a comment on rail freight and four per cent made a comment on 'other freight' matters. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

General support

- Some stakeholders expressed overall support for policies and proposals, offering best practice examples or ideas how to build upon them in future

Land use considerations

- Need for the London Plan (supported by MTS) to safeguard land for sustainable freight uses including rail freight terminals
- Assurance was sought that freight uses will not infringe on development land intended for activities that might be discouraged by proximity to freight facilities (e.g. housing in the London Thames Gateway)
- Suggestions made regarding facilities outside London area or outside MTS / LP remit (e.g. at airports and near the M25)

Modal shift and environmentally-friendly freight vehicles

- Some concern that an increase in rail freight (e.g. in North/East London) would reduce passenger rail capacity
- Support for water freight policies and proposals with geographically-specific suggestions
- Support for more references to eco-friendly road freight technology, i.e. MTS needs more policies/proposals dedicated to electric / low carbon freight vehicles (especially in central London)
- Support for implementing non-motorised freight solutions such as cycling

FORS, and Delivery and Servicing Plans (DSPs)

- The current Freight Operator Recognition Scheme (FORS) is supported by some stakeholders, others wished to see proposals strengthened, i.e. that FORS membership should be a pre-requisite for suppliers to the GLA family and boroughs
- Some doubt about the social and environmental benefits FORS can bring and a claim that the design of the scheme is too bureaucratic
- Support for Delivery and Servicing Plans (DSPs) and Construction Logistics Plan approaches – e.g. for major projects such as Crossrail

Consolidation and break-bulk centres

- Some stakeholders pointed out that freight distribution by road will, out of necessity and market preference, remain the dominant mode. Therefore, they consider the scope for mode shift to rail and water is limited
- Support shown for the consolidation centre approach
- Some scepticism as to the usefulness/private sector appeal of consolidation and break-bulk centres, claiming the existing supply chain is efficient and employs vertical consolidation centre approach

Parking, loading and out of hours delivery

- Stakeholders highlighted that current conflicts generated by freight activities
- Support for out of hours delivery
- However some stakeholders had reservations about the impact of out of hours delivery on residents at night
- Some support for changes to London Lorry Control Scheme
- Some opposition to changes to London Lorry Control Scheme

Safety

- Suggestions regarding safety of freight vehicles, e.g. conflicts with cyclists

Other issues

- Request for acknowledgement of specialist facilities for express freight services and deliveries to central London and the importance of air freight for certain sectors of the (knowledge) economy
- Support for Freight Quality Partnerships (FQPs) seeking text / proposals to re-affirm their importance
- New proposals submitted, e.g. dedicated London Lorry, use of Post Office rail tunnels

Editorial points

- Text/layout changes suggested (e.g. have a dedicated freight section in the MTS)

TfL Response

General support

Where general support has been expressed, comments have been noted and will be considered in the implementation of MTS policies and proposals.

Land use considerations

The spatial aspects of freight, for example safeguarding wharves and land-use policies encouraging multi modal freight terminals, are most appropriately covered in the London Plan. Policies 6.14 and 6.15 of the draft replacement London Plan address the spatial planning dimensions of rail and water freight facilities.

Current Supplementary Planning Guidance (SPG) documents, Industrial Capacity and Land for Transport functions make reference to rail and water freight and their land use requirements. Revisions to these documents are anticipated following final publication of the replacement London Plan. Furthermore, the Sub-regional Transport Planning process will identify the opportunities and barriers in strategic freight distribution, for example, measures required to mitigate the traffic impacts of any new proposed intermodal rail/road freight facility. This includes working with stakeholders in neighbouring regions (e.g. South East).

TfL considers that measures are outlined in the PD MTS (based on Proposal 3) to relieve London of freight trains without an origin or destination in the capital, including support for Government investment in the Felixstowe-Nuneaton line. Further investment in rail capacity is sought by Proposal 8. The MTS also offers support for gauge clearance (funded in the current HLOS) of the Gospel Oak-Barking line which would enable a diversionary route from the North London Line for freight trains travelling to destinations on the West Coast Main Line. Both schemes are referenced in section 5.2.4. Further train path conflicts may be addressed in future Rail Freight Plans for London and TfL's submission to DfT as part of the next HLOS funding round. TfL recommends no change.

Modal shift and environmentally-friendly freight vehicles

Support for low carbon vehicles and modal shift to rail and water is noted and welcomed by TfL, and no changes are required to the draft policies, proposal or paragraph text. The use of non-motorised freight vehicles is referred to in section 5.13.7.

TfL considers that Proposal 38 contains measures outlining support for waterborne freight, supported by paragraph text in section 5.7.5 [5.7.5]. Further support is offered within sections 5.22 [5.20] and 5.24.3 [5.22.3]. Therefore, no changes are recommended.

TfL considers that Proposal 2 contains measures outlining support for rail freight, supported by paragraph text in 5.24.3 [5.22.3]. Therefore, no changes are recommended.

Proposals that seek to encourage mode shift will be monitored in the *Travel in London* report. Monitoring is outlined in Policy 29 and throughout chapter 9.

FORS, Delivery and Servicing Plans (DSPs) and Construction Logistics Plans (CLPs)

FORS is currently supported principally through Proposal 117 [116]. It is considered that a change to the draft MTS could help give further support to FORS through public sector procurement. FORS will be subject to on-going development work which will provide an opportunity to address some stakeholder reservations.

TfL considers that Proposal 117 [116] contains measures outlining support for Delivery and Servicing Plans. The PD MTS offers further support in paragraphs 4.2.3.4 [4.2.3.4]; 5.18.5 [5.17.5]; 5.22.3 [5.20.3] and 5.24.3 [5.22.3]. Therefore, no changes are recommended.

TfL considers that Proposal 117 [116] contains measures outlining support for Construction Logistics Plans. The MTS offers further support in sections 4.2.3.1; 5.22.3 [5.20.3] and 5.24.3 [5.22.3]. Therefore, no changes are recommended.

Consolidation and break-bulk centres

TfL considers that Proposal 119 [118] outlines measures to reduce congestion and improve supply chain efficiency through consolidation and break-bulk centres. The effectiveness of these will be monitored in Travel in London report. Monitoring is outlined in Policy 29 and throughout Chapter 9.

Measures to encourage greater uptake of sustainable freight distribution methods and low carbon vehicles are already addressed by Policy 12 and Proposals 87 [86]; 99 [98]; 103-105 [102-104] and 117[116]. This is an increasingly important issue nationally and as such, national policy on low carbon freight vehicles may become more comprehensive over the course of the Strategy.

Comments regarding facilities outside the Mayor's jurisdiction have been noted. The Sub-regional Plan process will take forward dialogue with authorities outside the GLA area. TfL recommends no change.

Parking, loading and out of hours delivery

Parking and loading issues are addressed principally by Proposal 126 [125], which takes a flexible approach and by Proposals 87 [86] and 117-119 [116-118] which seek to improve the efficiency of freight operations, including out of hours deliveries. Measures to manage the road network are outlined in Proposals 30-33. TfL recommends no change.

Safety

The PD MTS already contains measures to help improve the safety of freight vehicles in Proposals 68-70 [67-69]. However, it is considered that further support to improving cycle safety could be included (see section on Road Safety in this report). TfL's annual Cycle Safety Action Plan will specify in greater detail measures to improve cyclist safety.

Other issues

TfL recommends a change to the text to set out its support to developing Freight Quality Partnerships.

Measures to improve the reliability of central London deliveries are covered in Policy 12 and Proposals 30 to 33 and 117 to 119 [116 to 118] which seek to manage the road network more efficiently and make better use of road capacity by encouraging delivery at off-peak periods. Moreover Proposal 124 [123] outlines a fair and consistent approach to enforcement of parking and loading regulations in London. The Sub-Regional Transport Plan process will investigate in greater detail the measures that may be needed to address central London freight issues.

A number of non-strategic and/or more specific proposals that would require significant feasibility studies have been noted, for example use of the former Post Office rail tunnels. These are not intended to be addressed in the MTS and would be more appropriately considered in the Sub-regional, local and modal planning processes. TfL recommends no change.

Editorial points

TfL does not consider a new stand-alone freight section to be appropriate in the MTS as freight issues are cross-cutting across safety, managing the road network, climate change and parking and loading.

TfL Recommendations

Amend section 5.22.3 'Smarter transport of freight and services' and Proposal 116 to express support for Freight Quality Partnerships (FQPs)

Amend Proposal 107 to encourage public sector procurement bodies and their suppliers to procure freight services from FORS members or freight carriers able to demonstrate equivalent competencies

33. Fares and ticketing

Section 5.23 of the draft MTS describes the Mayor's approach to fares and ticketing. Policies 10, 11, 13 and Proposals 119-122 take this approach forward.

Analysis of responses

Thirty-two stakeholders commented on issues relevant to this section. These were:

Age Concern London, Campaign for Better Transport, Campaign to Protect Rural England, Chartered Institute of Environmental Health (CIEH), Cllr Liz Santry - Haringey, Cllr Rahman Khan - Haringey, Corporation of London, First Capital Connect, Inclusion London, London Assembly, London Borough of Barking & Dagenham, London Borough of Camden, London Borough of Hackney, London Borough of Islington, London Borough of Newham, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Councils, London First, London Liberal Democrats, London TravelWatch, London Visual Impairment Forum, Park Royal Partnership (PRP), Transport Planning Society, TSSA, Unite, Valerie Shawcross AM and Westminster City Council.

Twenty-three per cent of respondents to the open responses section of the public questionnaire (Question 2) made a comment on fares and ticketing; three per cent made a comment in this issue in response to Question 4. In the email and letter responses from the public, 31 per cent of respondents commented on fares and ticketing. Two per cent made a comment on concessionary fares. The majority of comments expressed opposition to recent fare increases, which was a view shared by stakeholders.

Issues raised

The following is a list of the issues raised:

- Opposition to recent fare increase and call for a more detailed strategy for fare levels
- Removal of the affordability MTS outcome and some concern over the future of concessionary fares
- Support for the implementation of 'through ticketing'

TfL Response

Fares increase

Proposal 120 [119] states that fares will provide an appropriate and necessary level of financial contribution towards the cost of providing public transport services. Any future changes to fare levels would be a business planning issue and the TfL Business Plan outlines how fares will rise from January 2011, with future decisions on fares made on an annual basis. TfL considers PD MTS measures to be effective with regard to fare increases. TfL recommends no change.

Affordability

The Mayor is committed to ensuring fares are set at an appropriate and sustainable level. Concessions will be reviewed to ensure they are made available in the most effective manner to those most in need (Proposal 121 [120]). 'Real fares levels' will be monitored as a strategic indicator for the 'Improving transport opportunities for all' goal. TfL considers the measures set out in the PD MTS to be effective with regard to fare levels, and recommends no change.

Through ticketing

The PD MTS sets out that the Mayor will focus on integrating fares across all modes and states that the use of common ticket types and an approach to standardisation will be applied where appropriate (Proposal 122 [121]). There are no immediate proposals to introduce through ticketing; however, Proposal 123[122] provides scope for review if considered appropriate. TfL considers these measures to be effective with regard to ticket integration, and therefore recommends no change.

TfL Recommendations

No recommended changes

34. Parking and Loading

Section 5.24 of the Public Draft MTS describes the approach to regulation and enforcement of parking and loading in London. Proposals 123-126 take this approach forward.

Cycle parking, coach parking and issues related to taxis and private hire vehicles are covered in the relevant cycle, coach and taxis sections. Park & Ride is covered in the interchange section and EV incentives are covered in the Climate Change section. Workplace Parking Levy is covered in the Road User Charging Section. Parking for disabled people is covered in the Transport Opportunities for All section.

Analysis of responses

Fifty-seven stakeholders commented on issues relevant to this section. They were:

Association of British Drivers, Association of International Courier and Express Services, Better Bankside, British Motorcyclists Federation, British Vehicle Rental and Leasing Association, Campaign for Better Transport, CBI, Central London Freight Quality Partnership, Commissioning Support for London – NHS, Corporation of London, CTC, English Heritage, Federation of Small Businesses, Friends of Capital Transport Campaign, Friends of the Earth, IDAG, Inclusion London, Jenny Jones AM, Licensed Private Hire Car Association (LPHCA), London Borough of Barking & Dagenham, London Borough of Bexley, London Borough of Bromley, London Borough of Camden, London Borough of Enfield, London Borough of Hackney, London Borough of Havering, London Borough of Hillingdon, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Newham, London Borough of Redbridge, London Borough of Waltham Forest Council, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Councils, London Cycling Campaign, London Disability Cycling Forum, London First, London Forum of Amenity and Civic Societies, London Liberal Democrats, London TravelWatch, NHS Lambeth, North West London Hospitals NHS Trust, Park Royal Partnership (PRP), RAC Foundation, RNID, Royal Borough of Kensington & Chelsea, Royal Free Hampstead NHS Trust, Society of Motor Manufacturers and Traders Ltd (SMMT), Tandridge District Council, The Confederation of Passenger Transport, The South London Partnership, Transport Planning Society, Uklpg, West London Partnership and Westminster City Council.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, 5 per cent of respondents made a comment with regard

to parking and two per cent on delivery hours and loading. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of the issues raised:

- Should improve motorcycle parking provision
- Support more flexible approach to parking standards in outer London as in the London Plan
- Concern about inconsistent parking regulations in London
- Support for the principle of fair/reasonable regulations and enforcement
- Calls for greater and more flexible parking provision
- Calls for a limitation on parking provision
- Enabling effective deliveries, including night-time deliveries
- Support for emissions-based parking charges but some concern of the impact on parking revenues and views that parking charges should focus on demand management
- Need ability to pay for parking by text as well as by phone

TfL Response

TfL recognises that it is essential that parking regulations reflect local circumstances and are therefore generally most effectively determined at a borough level. The boroughs have developed parking management plans that balance the needs of road users in the local area and take into account a number of the identified issues. Notably, motorcycle parking, short stay parking at local services, parking for the mobility impaired and arrangements for kerbside and night-time deliveries are issues that are generally determined by the boroughs through local planning documents. TfL recommends no changes.

Motorcycle Parking

Section 5.26.3 [5.24.3] of the PD MTS states that motorcycle parking is most effectively addressed at a local level. Therefore, TfL does not recommend any changes.

Outer London Parking Standards

The Mayor supports local decision making and accountability for parking policy. The London Plan provides outer London boroughs with greater flexibility to influence

parking standards for office developments, should they wish to do so. No change is therefore recommended.

Parking Regulations and Enforcement

The fact that parking policy is a matter for individual boroughs will inevitably lead to some differences in approach between boroughs in London. However, Proposal 124 [123] of the PD MTS seeks to make parking regulations more easily accessible by establishing a single portal to provide access to parking regulations across London. No changes are recommended.

Support for fair parking enforcement is noted.

Parking Provision

There was a range of opinions about the need to provide more and less parking. Some respondents said it should be made easier to park for short periods of time at services such as shops, libraries, and leisure centres while others said there needs to be tighter controls on parking to encourage a shift to walking, cycling and public transport. One stakeholder stated that parking should be minimised on main roads. Parking provision remains an issue which is best decided on a local, case-by-case basis and as indicated earlier, is a borough matter. Therefore no change is recommended.

Parking for Deliveries

The PD MTS recognises the importance of freight transport in Proposal 126 [125] where the need to provide adequate off-street lorry parking and waiting facilities for new developments is set out. No change is recommended.

Emissions-Based Parking Charges

Support for emissions-based parking charges to incentivise the switch to less polluting road vehicles, as set out in Proposal 125 [124], is noted, as is the concern that this will have a negative effect on revenue. TfL considers that emissions-based parking charges have a role to play in managing demand. No change is recommended.

Payment for Parking by Text

Parking charges and the collection of payment are largely the responsibility of the boroughs in London. Therefore, no change is recommended.

TfL recommendations

No changes are recommended

35. Road user charging

The comments summarised in this section relate to the use of road pricing to manage demand on London's roads, which is considered in Policy 11 and Proposal 129 of the Public Draft Transport Strategy.

Analysis of responses

Sixty-six stakeholders commented on this issue. These were:

Association for Consultancy and Engineering, the Association of British Drivers, the Association of International Courier and Express Services, the Automobile Association, the British Vehicle Rental and Leasing Association, the Campaign for Better Transport, the Campaign for Clean Air in London, the Confederation of British Industry, the Chartered Institute of Environmental Health, the Chartered Institution of Highways and Transportation, the Chartered Institute of Logistics & Transport UK, the Crown Estate, CTC, the Energy Saving Trust, the Environment Agency, the Federation of Small Businesses, the Friends of Capital Transport Campaign, Friends of the Earth, the Highways Agency, the Institute of Civil Engineers, Jenny Jones AM, Living Streets, the London Assembly, the London Boroughs of Barking & Dagenham, Bexley, Brent, Bromley, Camden, Croydon, Greenwich, Hackney, Haringey, Harrow, Havering, Hounslow, Islington, Lambeth, Newham, Redbridge, Southwark, Tower Hamlets, Waltham Forest and Wandsworth, the London Chamber of Commerce and Industry, the London Civic Forum, London Councils, the London Cycling Campaign, London First, the London Forum of Amenity and Civic Societies, the London Liberal Democrats, the London Thames Gateway Development Corporation, London TravelWatch, Network Rail, the RAC Foundation, Railfuture, Richard Tracey Conservative Spokesperson London Assembly, the Royal Boroughs of Kensington & Chelsea and Kingston upon Thames, the Society of Motor Manufacturers and Traders Ltd, Sustrans, the Transport Planning Society, TSSA, the TUC, Unite, Valerie Shawcross AM and Westminster City Council.

Of these, 44 expressed explicit support for demand management, or consider that it might be necessary to combat congestion or emissions. These were:

The Association for Consultancy and Engineering, the Campaign for Better Transport, the Campaign for Clean Air in London, the Chartered Institution of Highways and Transportation, the Chartered Institute of Logistics & Transport UK, the Confederation of British Industry, the Crown Estate, CTC, the Energy Saving Trust, the Environment Agency, the Friends of Capital Transport Campaign, Friends of the Earth, the Highways Agency, the Institute of Civil Engineers, Jenny Jones AM, Living Streets, the London Boroughs of Barking & Dagenham, Hackney, Haringey, Hounslow, Islington, Lambeth, Redbridge, Southwark, Tower Hamlets, Waltham Forest and Wandsworth, the London Civic Forum, the London Cycling Campaign,

London First, the London Forum of Amenity and Civic Societies, the London Liberal Democrats, London TravelWatch, the RAC Foundation, Railfuture, the Royal Boroughs of Kensington & Chelsea and Kingston upon Thames, Sustrans, the Transport Planning Society, TSSA, the TUC, Unite, Valerie Shawcross AM and Westminster City Council.

Many of these suggested that there were issues that should be considered before any scheme was introduced.

Six stakeholders explicitly opposed the use of demand management. These were: the Association of British Drivers, the Federation of Small Businesses, the London Boroughs of Bromley and Croydon, Richard Tracey, the London Assembly Conservative spokesperson, and the Automobile Association.

Sixteen stakeholders did not explicitly support or oppose the use of demand management. These were:

The Association of International Courier and Express Services, the British Vehicle Rental and Leasing Association, the Chartered Institute of Environmental Health, the London Assembly, the London Boroughs of Bexley, Brent, Camden, Greenwich, Harrow, Havering and Newham, the London Chamber of Commerce and Industry, London Councils, the London Thames Gateway Development Corporation, Network Rail, and the Society of Motor Manufacturers and Traders Ltd.

Some of these gave comments that could potentially have been interpreted as being supportive of demand management.

Public response

Question 4 of the public questionnaire noted that it may be necessary to consider a fair system of road user charging to reduce congestion and asked, “to what extent do you agree that a fair system of managing demand for road use should be used if necessary?” 88 per cent of respondents responded to this question, well above the average response of about 75 per cent, making it the fourth most answered question and suggesting that it is a key consultation issue.

39 per cent of respondents agreed that road user charging should be used if necessary (sum of those who agreed and strongly agreed), compared to 29 per cent who opposed this proposal (sum of those who disagreed and strongly disagreed). Question 4 of the public questionnaire invited respondents to make any additional comments; two per cent made a comment on further road user charging in London. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised in relation to managing demand through road pricing

- Need for more clarity/details of schemes/more work to be done/Consultation
- Need for road pricing to meet MTS goals/Traffic impacts/Congestion impacts/ Air quality impacts/CO₂ emissions impacts/Road safety impacts
- Mayor's statements on road pricing
- Public transport alternatives
- Fairness
- Dynamic road pricing systems/Payment systems/Vehicle types
- Revenues
- Impact on economy/Impact on individuals/Needs of business
- Borough schemes/Issues posed by multiple schemes
- Public acceptability
- Principle

TfL Response

Need for more clarity/details of schemes/more work to be done on schemes/consultation

Proposal 130 [129] does not propose a specific scheme but confirms that the Mayor will keep the option of managing demand for road use through road user charging under consideration. As noted in section 5.27.6 [5.26.6] of the PD MTS, any proposed scheme would, by law, be subject to full public and stakeholder consultation. This process would set out full details of its operation and likely impacts to be considered. TfL recommends that a clarification is added to the effect that any consideration of road user charging is likely to be in the longer term.

Need for road pricing to meet MTS goals/Traffic impacts/congestion impacts/Air quality impacts/CO₂ emissions impacts/Road safety impacts

Section 5.27.6 [5.26.6] states that final decisions on the mix of demand management measures that might be deployed across London and the relative priority accorded such interventions would depend on a number of considerations including the specific aims of the strategy. Proposal 130 [129] further states that the Mayor may consider road user charging schemes if other measures at his disposal are deemed insufficient to meet the strategy's objectives. These would include the reduction and management of traffic and congestion, the improvement of air quality, and the reduction of CO₂ emissions and road safety. TfL recommends no change.

Mayor's statements on road pricing

The Transport Strategy is the definitive account of the Mayor's vision for transport in London. Proposal 130 [129] is clear that the Mayor may consider road user charging schemes if other measures at his disposal are deemed insufficient to meet the strategy's objectives. TfL recommends no change.

Public transport alternatives

Proposal 130 [129] states that any proposed road user charging scheme would need to take account of local conditions. This would include consideration of public transport alternatives and the issue would be considered during the necessary public

and stakeholder consultations that would accompany any proposal to introduce a specific scheme. TfL recommends no change.

Fairness

Proposal 130 [129] states that any scheme would need to be fair. This would be considered during the necessary public and stakeholder consultations that would accompany any proposal to introduce a specific scheme. TfL recommends no change.

Dynamic road pricing systems/Payment systems/Vehicle types

Proposal 130 [129] states that any scheme would need to be flexible, relating charges to the external costs of travel, with sensitivity to time of day and scope for discounts or exemptions for specific user groups. Any proposal to introduce a scheme would set out the specific methods of operation and would be subject to full public and stakeholder consultation. TfL recommends no change.

Revenues

Section 5.27.6 [5.26.6] of the public draft Transport Strategy notes the significant potential for road user charging schemes to raise revenue, alongside their contribution to addressing the challenges facing London's transport system. TfL recommends no change.

Impact on economy/Impact on individuals/Needs of business

Proposal 130 [129] states that any proposed road user charging scheme would need to be fair and flexible and take account of local conditions, the impact on other regions, and the balance between the objectives of a scheme and its costs and other impacts. This would include consideration of the impact of a scheme on individuals, business and the economy and the issues would be considered during the necessary public and stakeholder consultations that would accompany any proposal to introduce a specific scheme. TfL recommends no change.

Borough schemes/Issues posed by multiple schemes

Section 5.27.6 [5.26.6] states that the Mayor would work with local authorities to evaluate the potential for local road user charging schemes. The details of these and any interoperation with other road user charging schemes in London would be presented for full public and stakeholder consultation. The complexity of any proposed scheme, and its interaction with other schemes would be considered during that process. TfL recommends no change.

Public acceptability

Section 5.27.6 [5.26.6] of the PD MTS states that any proposed scheme would, by law, be subject to full public and stakeholder consultation, allowing the Mayor to consider public attitudes alongside other salient factors before making a decision on the scheme.

Principle

The PD MTS presents TfL and the Mayor's view on the principle of road user charging to manage demand and assist in meeting the Mayor's objectives for transport in London.

TfL Recommendations

Minor change recommended to section 5.25.6 to note that consideration of road user charging is more likely to be in the longer term

36. The Congestion Charging scheme

Section 5.25 of the public draft of the Mayor's Transport Strategy describes the central London Congestion Charging scheme, and sets out future plans. In particular the section of the MTS sets out the proposal to remove the Western Extension, which is dealt with in the next section of this report. Section 5.25 also contains Proposal 128 detailing future plans for the remaining Congestion Charging zone.

Analysis of responses

In all, 23 stakeholders made comments on Proposal 128 or on the Congestion Charging scheme generally. These were: the British Vehicle Rental and Leasing Association, the Campaign to Protect Rural England, Cllrs Liz Santry and Rahman Khan – Haringey, the Department for Transport, the Energy Saving Trust, the Federation of Small Businesses, the Friends of Capital Transport Campaign, Friends of the Earth, Greg Hands MP, the Institute of Advanced Motorists, Jenny Jones AM, the London Borough of Lambeth, the London Chamber of Commerce and Industry, London Councils, the National Joint Utilities Group, the RAC Foundation, the Royal Borough of Kensington & Chelsea, the Society of Motor Manufacturers and Traders Ltd, Sustrans, TSSA, UKIpg and Westminster City Council.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, two per cent of respondents made a comment with regard to Congestion Charging. Question 4 of the public questionnaire invited respondents to make any additional comments; four per cent made a comment on Congestion Charging. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- CO₂ charging
- Traffic and congestion
- Payment mechanisms
- Revenue
- Needs of, and concessions for, businesses
- Fairness
- Sustainable modes
- Dynamic road-pricing tariffs
- Roadworks and congestion
- Alternative fuel discount
- CO₂ impacts

- Air quality impacts
- Principles of Congestion Charging
- Aims of Congestion Charging

TfL Response

CO₂ charging & CO₂ impacts

The Mayor announced in July 2008 that the previously proposed £25 charge for cars with high CO₂ emissions would no longer be implemented. The Congestion Charging scheme, which the Mayor proposes to continue to operate, discourages the use of private motor vehicles and hence contributes to the reduction of CO₂ emissions from transport in London. Proposal 129 [128] commits to keeping the Congestion Charging scheme under review and making variations to it to reflect best practise, improve its operation or to help it deliver the desired outcomes of the Transport Strategy.

In addition, Proposals 1, 2, 4, 7, 9, 17, 23, 25, 30, 31, [33], 47 [46], 48 [47], 50-51 [49-54], 57-62 [56-61], 72, 73, 83-85, 91-93, 96-109, 113, 115-119, 125 and 130 [68, 71, 72, 82-84, 90-92, 95-108, 112, 114-118, 124, and 129] all take forward the Mayor's commitment to tackling climate change.

TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Traffic and congestion

TfL notes the comments made by stakeholders that Congestion Charging has been an effective tool for reducing traffic and congestion. Proposal 129 [128] in the PD MTS reflects the Mayor's commitment to maintaining and building upon the effectiveness of the central London Congestion Charging scheme. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Payment mechanisms

TfL notes the comments made by stakeholders that the Congestion Charging payment system should be reviewed and updated. Proposal 129 [128] in the public draft of the MTS provides for the Mayor to make changes to the scheme to reflect best practise and improve its operation. TfL considers that no changes to this proposal are necessary in light of these comments.

Revenue

TfL notes comments from stakeholders that non-implementation of previous CO₂ Charging proposals reduces the income that TfL could expect from the Congestion Charging scheme. While the principal aim of Congestion Charging is to reduce

congestion, the net revenues raised by the scheme are a welcome side-benefit of the scheme and the significant net revenue raised is invested in improving transport in London. However, the previous CO₂ Charging proposals were not designed to raise additional revenue, and TfL does not consider that a reduction in expected income would be sufficient justification to reinstate the policy. Section 8.2. of the MTS explains TfL's approach to funding transport in London, which will benefit from the continued operation of Congestion Charging in central London. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Needs of, and concessions for, businesses

TfL notes comments raised by stakeholders who request special consideration for businesses operating in the Congestion Charging zone. However TfL considers that specific discounts or exemptions for businesses using the zone would be difficult to define and enforce, and would undermine the effectiveness of the scheme. Businesses could potentially benefit from the various concessions that exist for specific vehicle types, and the Fleet Autopay scheme already assists those managing multiple vehicles. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Fairness

TfL notes the comments raised by stakeholders who suggest that the Congestion Charging scheme is or can be unfair. TfL does not accept the view that the scheme is unfair, but recognises that some people affected by the scheme feel that they have lost out differentially because of it. Section 5.27 [5.25] of the PD MTS makes clear that the Mayor intends to continue the operation of the central London Congestion Charging scheme, making variations as appropriate to reflect best practise, improve its operation or to help it deliver the desired outcomes of the Transport Strategy. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Sustainable modes

TfL notes the points made that Congestion Charging is a useful means of supporting the use of sustainable modes. This is a key benefit and aim of the scheme and this impact is reflected in section 5.27.1 [5.25.1] of the PD MTS. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Dynamic road-pricing tariffs

TfL notes the comments of those stakeholders who seek the introduction of variable or dynamic charging regimes to increase the effectiveness of the scheme. Though there are no plans or proposals to introduce such a change, Proposal 129 [128] provides that the Mayor may make variations to the scheme to reflect best practise, improve its operation or to help it deliver the desired outcomes of the Transport

Strategy. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Roadworks and congestion

TfL notes comments raised regarding the contribution of roadworks to congestion in the Congestion Charging zone. As stated in paragraph 708 of the public draft of the Transport Strategy TfL believes that a combination of factors, including street-works as well as road-space reallocation policies, have been responsible for the reduction in effective road network capacity that appears to have taken place in the Congestion Charging zone. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Alternative fuel discount

TfL notes the comments concerning the discounts available for alternatively-fuelled or low-CO₂ vehicles. Proposal 129 [128] commits to keeping the Congestion Charging scheme under review and making variations to it to reflect best practise, improve its operation or to help it deliver the desired outcomes of the Transport Strategy. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Air quality impacts

TfL notes the comment that the central London Congestion Charging scheme has been beneficial for air quality. The primary focus of the Congestion Charging scheme is the reduction of congestion through reductions in traffic. Related reductions in the emission of air quality pollutants from vehicles in the zone, while helpful, have been comparatively small and not resulted in measurable improvements in air quality because other factors have a much more significant effect in determining air quality. Other measures set out in the MTS and in the Mayor's Air Quality Strategy will be the focus of efforts to improve London's air quality, but the continued operation of Congestion Charging in the original central London zone will assist. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

Principles of Congestion Charging

TfL notes the comment expressing support for the principle of Congestion Charging. Proposal 129 [128] demonstrates the Mayor's commitment to maintaining and building upon the success of the scheme and TfL considers that no changes are necessary in light of these comments.

Aims of Congestion Charging

TfL notes the comment that the aim of the Congestion Charging scheme should be to reduce congestion, not emissions. As noted in section 5.27.1 [5.25.1] of the public draft Transport Strategy, the Congestion Charging scheme is focused on reducing the impact of congestion on the economy by reducing traffic and promoting

sustainable transport choices. Related reductions in the emission of air quality pollutants from vehicles in the zone, while helpful, have been comparatively small and not resulted in measurable improvements in air quality because other factors have a much more significant effect in determining air quality.

Other measures set out in the MTS and in the draft Mayor's Air Quality Strategy will be the focus of efforts to improve London's air quality, but the continued operation of Congestion Charging in the original central London zone, with improvements as appropriate, will assist in meeting the air quality challenge. TfL considers that no changes to Proposal 129 [128] are necessary in light of these comments.

TfL Recommendations

No changes recommended

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37. The proposed removal of the Western extension

Proposal 127 of the Public Draft MTS proposed that the Western Extension (WEZ) of the Congestion Charging Zone be removed, and section 5.25.3-5 provided further information on this.

Overall, 48 out of 151 stakeholders who responded to the MTS consultation commented on the proposal to remove the Western Extension. Of the 4,948 responses from members of the public, businesses and other organisations using the consultation questionnaire, 4,686 addressed the specific closed question which asked how far respondents agreed or disagreed with the proposal to remove the Western Extension

There was some evidence of informal campaigning to encourage respondents to respond in a particular way and a number of public respondents registered concern that consultation leaflets had been delivered to them together with unofficial instructions on how to respond. The number and extent of this is not known.

Overall stakeholder support and opposition for the proposal

33 stakeholders registered explicit support or opposition for the proposal to remove the Western Extension, of whom 23 opposed the proposal while 10 supported it. A further 14 stakeholders commented on the Western Extension in some way, of whom 10 gave comments which suggested that they were concerned over the removal of the scheme.

Stakeholders in support of the removal of the Western Extension

Support for the proposal came from the Association of British Drivers, the Association of International Courier and Express Services, the Automobile Association, the British Vehicle Rental and Leasing Association, the Federation of Small Businesses, Greg Hands MP, the London Boroughs of Hammersmith & Fulham, Wandsworth and Westminster and the London Chamber of Commerce and Industry.

Stakeholders in opposition to the removal of the Western Extension

Those who expressed clear opposition to the proposal were the Campaign for Better Transport, the Campaign for Clean Air in London, the Campaign to Protect Rural England, the Chartered Institute of Environmental Health, CTC, the Energy Saving Trust, Friends of the Earth, Inclusion London, Jenny Jones AM, Living Streets, the London Boroughs of Islington, Lambeth and Redbridge, the London Civic Forum, the London Civic Forum and Youth Campaign for Better Transport, the London Cycling Campaign, London First, the London Forum of Amenity and Civic Societies, London TravelWatch, NHS London, Railfuture, the Royal Borough of Kingston upon Thames, the TUC and Valerie Shawcross AM.

Stakeholders who commented on the Western Extension but did not explicitly register support/opposition to the removal of the scheme

Those who commented on the Western Extension without explicitly registering support or opposition to its removal were, Cllrs Liz Santry and Rahman Khan of Haringey, the Friends of Capital Transport Campaign, the London Boroughs of Camden, Hackney, Havering, Hillingdon and Hounslow, the RAC Foundation, the Royal Borough of Kensington & Chelsea, the Chartered Institution of Highways and Transportation, TSSA and Unite.

Of these, the Chartered Institute of Environmental Health, Cllrs Liz Santry and Rahman Khan of Haringey, the Friends of Capital Transport Campaign, the London Borough of Hackney, the RAC Foundation, the Royal Borough of Kensington & Chelsea, the Chartered Institution of Highways and Transportation, TSSA and Unite gave responses which suggested that they were concerned over aspects of the proposal to remove the Western Extension.

Comments on the Western Extension from stakeholders supportive of the removal of the Western Extension

Those who were supportive of the proposal to remove the Western Extension raised the following issues with regard to the Western Extension:

- Delays / timelines for removal / implementation programme
- Negative impacts of the Western Extension on the local economy
- The effectiveness of the scheme
- Negative impact of the Western Extension on congestion in the original central London zone
- Public support for the proposal to remove the Western Extension
- Unfairness of the Western Extension on certain groups
- The negative impact of the Western Extension on parking outside the zone
- Support for removal dependent on mitigation measures being in place

Comments on the Western Extension from stakeholders opposing the removal of the Western Extension

Those opposing the removal of the Western Extension raised the following issues with regard to the proposal:

- Concern over air quality impacts of removal
- Concern over traffic impacts of removal
- Concern over revenue impacts
- Mitigation measures
- Concern over CO₂ impacts
- Concern over impacts – general
- Priority for sustainable modes
- Concern over costs of removal
- Mayor's statements regarding Congestion Charging have been contradictory
- Should be two separate zones
- Concern over impact on road casualties

- Alternative charging tariffs

Comments on Western Extension from stakeholders not explicitly supporting or opposing the removal of the Western Extension

Those who did not explicitly support or oppose the proposal to remove the Western Extension raised the following issues with regard to the proposal:

- Concern over traffic impacts of removal
- Concern over revenue impacts of removal
- Concern over the environmental impacts of removal
- Charge during morning peak only
- Mitigation measures
- The decision is principally a matter for local boroughs
- Questioning the effectiveness of the Western Extension
- Requesting more data on the impacts of the proposal
- Impact of the proposal on priority for sustainable modes
- There should be no discount for Western Extension residents if the zone is removed

The Royal Borough of Kensington & Chelsea stated that while the proposal to remove the Western Extension was in line with the results of the 2008 informal consultation on the issue, it has concerns about the impacts of removing the scheme on traffic, with knock-on impacts on its ability to allocate roadspace to sustainable modes and improve air quality. The borough also urges the Mayor to ensure that traffic in the area does not return to pre-charging levels.

Responses from individuals, businesses and other organisations concerning the Western Extension

In response to the specific closed question in the consultation questionnaire which asked how far respondents supported or opposed the removal of the Western Extension, 58 per cent of public respondents (2,885) supported the proposal (sum of those who agreed and strongly agreed), compared to 25 per cent (1,260) who opposed it (sum of those who disagreed and strongly disagreed).

The comment made most frequently in the free text box in Question 4 of the questionnaire was support for the proposal to remove the Western Extension: 5 per cent of all respondents (241) entered comments in this free-text box supporting the proposal to remove the Western Extension. 11 per cent of business respondents (23) made comments in support of the proposal in this free-text box – again, the single most frequent comment.

Seventy-one per cent of respondents stated their postcode, of these, 347 were in the Western Extension, 81 in the original charging zone, 2,739 in the rest of London, and

328 outside London. The respondents who gave Western Extension postcodes as their address were much more likely to agree with the proposal to remove the Western Extension than those who did not: 67 per cent who lived in the Western Extension agreed or strongly agreed with the proposal to remove the Western Extension compared to 21 per cent who lived in the original charging zone, 51 per cent who lived in the rest of London and 48 per cent who lived outside London.

There was a small but significant proportion of respondents (236 respondents, 5 per cent of the total sample) who answered the Western Extension question but did not answer any other section of the questionnaire. This group of single issue respondents were very much more likely to agree with the proposal to remove the Western Extension with all but one strongly agreeing to it (over 99 per cent) compared to 49 per cent of all responses who stated that they strongly agreed.

Ten of the 55 open responses to the consultation that TfL received from other organisations registered opposition to the removal of the Western Extension. These were: Client Earth, Southwark Living Streets, Islington Living Streets, the Chelsea Society, Harrow Friends of the Earth and West London Friends of the Earth, the Kensington Society, and Cheltenham Terrace Residents Association. Only one other organisation, the Bromley Borough Roads Action Group, expressed support for the removal of the Western Extension. With regard to open responses from members of the public (551), 20 per cent of these opposed the removal of the Western Extension, while 14 per cent supported it.

TfL response

The following section addresses the points raised by stakeholders as listed above. It deals with them in turn, although where the same point has been raised more than once it is only dealt with once here.

Concern over delays / timelines / implementation programme

TfL notes concerns raised over the length of time required to remove the Western Extension. The procedure required to remove the scheme is laid down in the GLA Act and must be followed if the scheme is to be removed. TfL also notes the wish for greater clarity over the implementation programme but considers that this would be set out fully in the consultation on a Congestion Charging Variation Order if the Mayor confirms the MTS proposal and formally proposes the removal. TfL does not recommend any change in light of these comments.

Concern over the impact of the Western Extension on the local economy

As noted in section 5.27.3 [5.25.3] of the Transport Strategy, TfL is conscious of concerns that have been raised over the impact that the Western Extension has had on the local economy. The section notes that emerging analysis suggests that the Western Extension may have contributed to a small decline in the rate of formation

of small enterprises, while similar analysis in the original central zone showed no discernible effect on the enterprise population in the area.

Section 5.27.3 [5.25.3] also points out that in the opinion of business owners and employers in the Western Extension zone (based on telephone interviews) their sales and profitability had declined since charging was introduced in the Western Extension zone in 2007, while respondents from comparator locations reported no such falls. The proposal to remove the zone is made in light of such concerns and TfL does not recommend any change in light of these comments.

Concern over the impact of the Western Extension on congestion in the original central London zone

TfL notes concerns raised over the impact of the Western Extension on congestion in the original central London zone. Section 5.27.3 [5.25.3] of the MTS recognises that a small decrease in congestion in the original central zone is a potential benefit of removing the Western Extension and TfL does not recommend any change in light of these comments.

Highlighting public support for the proposal to remove the Western Extension

TfL notes the strong and continued public opposition to the Western Extension and support for proposals to remove it. TfL believes that this concern is a legitimate consideration for the Mayor and the proposal to remove the Western Extension is made partly in light of this factor. TfL does not recommend any change in light of these comments.

Concern that the Western Extension is unfair

TfL notes the concern raised that the Western Extension is unfair. TfL does not agree with this view, but recognises that some people affected by the scheme feel that they have lost out differentially because of it. As noted in Section 5.27.3 [5.25.3] of the public draft Transport Strategy, there is a higher proportion of vehicles driven by local residents in the Western Extension, higher average speeds, and lower level of congestion in the area, than in the original Congestion Charging zone. Additionally, a number of elderly and disabled residents of the zone have reported a reduction in the frequency of visits by friends and family since the introduction of the scheme. Together with the somewhat lower (albeit still very good) provision of public transport in the area, this could contribute to a feeling that the scheme is unfair. Removing the Western Extension, and putting alternative measures in place to mitigate the impacts of doing so, should alleviate these concerns and TfL does not recommend any change in light of these comments.

Concern over the impact of the Western Extension on parking

TfL notes the view that the Western Extension has increased pressure on parking spaces outside the zone, though it does not have data that supports it. TfL does not recommend any change in light of these comments.

Support for removal is dependent on mitigation measures being in place

TfL notes that for some, support for the proposal to remove the Western Extension is dependent on mitigation of the impacts. Proposal 128 [127] in the public draft MTS explicitly notes the plan to introduce such mitigation measures as are practicable and desirable. TfL does not recommend any change in light of these comments.

Concern over air quality impacts of removal

TfL notes the concerns of those opposed to the removal of the Western Extension that the removal of the scheme would have undesirable implications for air quality. The primary focus of the Congestion Charging scheme has always been the reduction of traffic congestion through reductions in traffic. Related reductions in the emission of air quality pollutants from vehicles in the zone have been a welcome by-product, however they have been comparatively small and have not necessarily resulted in measurable improvements in air quality because other factors have a significant effect in determining air quality.

Correspondingly, the removal of the scheme would not be expected to result in a deterioration of measured air quality in London. As stated in section 5.27.4 [5.25.5] in the public draft of the MTS, measures to improve air quality which will be progressed through the Mayor's Air Quality Strategy will help to offset any increases in the emission of air quality pollutants.

The inclusion of light goods vehicles and minibuses in the Low Emission Zone scheme, which is now proposed for implementation in 2012, should help to ameliorate the removal of the Western Extension through pre-compliance benefits as owners and operators choose vehicles which will comply with the scheme in advance of its introduction. Benefits would also be brought by the tightening of the Low Emission Zone standards for buses, coaches and heavy goods vehicles and other measures in the draft Mayor's Air Quality Strategy such as the roll-out of hybrid buses, the retirement of the oldest, most-polluting taxis and the development of a low-emission taxi, the application of age-limits to private hire vehicles and the promotion of smarter travel and eco-driving.

The draft Mayor's Air Quality Strategy also highlights the potential for local measures to complement Londonwide action in specific areas of poor air quality. Air quality is addressed in its own section in this report, where more detail can be found.

TfL considers that the measures in the PD MTS and Air Quality Strategy would be effective to deal with the expected relatively small increase in emissions of air quality pollutants that would result from the removal of the Western Extension, and does not recommend any change in light of these comments.

Concern over traffic impacts of removal

TfL notes the concerns raised that removing the Western Extension would be likely to increase traffic and congestion in the area. In accordance with the proposal in the

MTS, TfL will pursue such measures in mitigation of these impacts as are both desirable and practicable. Measures that should help to mitigate the impacts of removing the Western Extension include the accelerated further implementation of electronically optimised traffic signals in the area, the introduction of the Mayor's Cycle Hire Scheme, the new road works permitting scheme, and a general review of signal timings. The Mayor's Smoothing Traffic Flow programme will also seek to ensure that journeys through the capital are as reliable as possible. However, as pointed out in section 5.27.4 [5.25.5] of the MTS, some increases in traffic and congestion would tend to arise. The Mayor will wish to consider how to set these against the importance that businesses and individuals place on access to the area by private transport and the impact on the local economy.

TfL considers that the relevant policies in the public draft MTS provide, to the extent possible, for adequate control and mitigation of the traffic flow effects of the removal of the Western Extension, and does not recommend any change to the MTS in light of these comments.

Concern over revenue impacts/costs of removal

TfL notes the concerns of those who point out that removing the Western Extension would entail some costs and directly reduce the income that TfL receives. While this is true, it is important to note that the Congestion Charging scheme is principally a traffic management scheme and that net revenues raised by the scheme to be invested in transport in London are an additional benefit. While some of this revenue would be lost if the Western Extension were removed, and there would be a smaller one-off cost associated with the removal of the scheme, this is not in itself a reason to retain it. It should also be noted that this reduction in charge income for TfL would represent a saving for those who currently pay the charge to drive within the Western Extension area. TfL does not recommend any change in light of these comments.

Mitigation measures

TfL notes the concerns of those stating that mitigation measures should be put in place or that they are unlikely to offset the impacts of removing the Western Extension. TfL intends to implement various measures in mitigation of the removal of the scheme, but accepts that it is unlikely that mitigation measures would fully offset the impacts of removing the Western Extension, as is pointed out in section 5.27.4 [5.25.5] of the public draft of the draft Transport Strategy. TfL would monitor the impacts and make further adjustments as necessary to ensure the negative impacts were minimised. TfL does not recommend any change in light of these comments.

Concern over CO₂ impacts

TfL notes the concerns of those opposed to the removal of the Western Extension that removing the scheme would have undesirable implications for emissions of climate change gases. Through its primary focus on reducing congestion by reducing traffic, the Congestion Charging scheme has brought reductions in CO₂ emissions from road transport in the zone. Accordingly, because removing the Western

Extension would be expected to increase traffic and congestion in the zone some increase in emissions of CO₂ would be expected. As stated in section 5.27.4 [5.25.5] of the public draft of the Transport Strategy this issue is to be addressed on a Londonwide basis – for example through measures set out in the Mayor’s Climate Change Mitigation and Energy Strategy and other measures in the MTS, which aim to minimise CO₂ emissions by supporting a shift to more efficient modes of transport, improving operational efficiency, and to stimulate the development and use of low carbon vehicles, energy and design principles. TfL does not recommend any change in light of these comments.

General expressions of concern over impacts

TfL notes general concerns raised about the impacts of removing the Western Extension. These are addressed both in section 5.27.4 [5.25.5] of the public draft of the Transport Strategy itself and in TfL’s responses to the points raised above, and TfL does not recommend any change in light of these comments.

Priority for sustainable modes

TfL notes the concerns raised that removing the Western Extension could reduce the priority given to sustainable modes such as the bus and cycling and walking. However, section 5.27.4 [5.25.5] of the public draft of the Transport Strategy indicates that the allocation of road capacity away from sustainable modes is not planned. TfL does not recommend any change in light of these comments.

Mayor's statements regarding Congestion Charging

TfL notes concerns raised about the Mayor’s statements in relation to the Western Extension and road user charging generally but considers that the PD MTS is a clear statement of the Mayor’s policies and proposals and notes that no order removing the Western Extension would be made without public consultation on a draft Variation Order. TfL does not recommend any change in light of these comments.

Should be two separate zones/Alternative charging tariffs

TfL notes the views of stakeholders who believe that the Western Extension should be retained as a separate zone from the original central London zone or that instead of removing it, an alternative charging tariff, such as a charge-free interpeak period, should be introduced. However, such options would not remove Congestion Charging from the Western Extension area and/or alleviate concerns over the impacts of the scheme on the local economy. TfL does not recommend any change in light of these comments.

Concern over impact on casualties

TfL notes the concern raised that the removal of the Western Extension would result in an increase in collisions. The Western Extension has not been clearly shown to have had an impact on the rate of accidents in the zone. Removal of the Western Extension is not thought likely to result in any increase in collisions. Measures proposed in the MTS such as the encouragement of improved road user behaviour

and adoption of technologies will help reduce collisions. TfL does not recommend any change in light of these comments.

The decision is principally a matter for local boroughs

TfL notes the comment that the future of the scheme should principally be a matter for local boroughs and recommends that the Mayor consider these views carefully when coming to a decision over the scheme. TfL does not recommend any change in light of these comments.

Questioning the effectiveness of the Western Extension

TfL notes the view that there is uncertainty over the effectiveness of the Western Extension. Its own monitoring suggests that while congestion in the zone has over time returned to pre-charging levels, this reflects a reduction in the effective capacity of the road network in the area. Hence, as indicated in section 5.27.4 [5.25.5] of the Transport Strategy, TfL anticipates an increase in traffic and congestion following the removal of the scheme, which will be mitigated as far as practicable and desirable. TfL does not recommend any change in light of these comments.

Requesting more data on the impacts of the proposal

TfL notes the request for more data on the impacts of removing the Western Extension. More data would be made available to accompany the draft variation order that would be necessary to effect the legal revocation of the scheme should the Mayor decide to formally propose it. TfL does not recommend any change in light of these comments.

There should be no discount for Western Extension residents if the zone is removed

TfL notes the view that residents of the Western Extension who currently receive the residents' discount should no longer receive it if the Western Extension is removed. These considerations would be addressed in the consultation on the variation order that would be necessary to effect the revocation of the scheme should the Mayor decide to formally propose it. TfL does not recommend any change in light of these comments.

TfL recommendations

Changes recommended to the text of section 5.25.1 to 5.25.5 to: explicitly acknowledge the implications of removing the Western Extension on TfL income and to acknowledge the sustained public opposition to the scheme. Other changes recommended to the text of section 5.25.1 to 5.25.5 to improve clarity

38. Expected outcomes of the MTS; Monitoring and Review of the MTS

Chapter 6 of the Public Draft MTS describes the expected outcomes of the MTS in 2031 compared to 2006 levels. Chapter 9 describes the monitoring and reporting arrangements for MTS.

Analysis of responses

Thirty-one stakeholders commented on issues relevant to this section. These were:

Age Concern London, Better Bankside, Campaign to Protect Rural England, Energy Saving Trust, Enfield NHS Trust, Environment Agency, Friends of Capital Transport Campaign, Friends of the Earth, Inclusion London, Institute of Civil Engineers (ICE), Living Streets, London Assembly, London Borough of Barking & Dagenham, London Borough of Brent, London Borough of Islington, London Borough of Lambeth, London Borough of Sutton, London Borough of Waltham Forest Council, London Cycling Campaign, London First, London Forum of Amenity and Civic Societies, London Liberal Democrats, London Primary Care Trusts, London TravelWatch, NHS Lambeth, NHS London, Park Royal Partnership (PRP), Roadpeace, Royal Borough of Kingston upon Thames, Sustrans and the West London Partnership.

Issues raised

The following is a list of the issues raised:

- Need for a description of the anticipated outcomes
- Targets: call for additional targets for road traffic reduction, physical accessibility; more interim targets; targets for particular groups of people and separate targets for central, inner and outer London; for borough-based targets; and more ambitious targets for walking, cycling, modal shift and road safety
- Indicators: suggestions for further indicators
- Suggestions on the detailed definition of indicators
- Performance monitoring arrangements
- Support or general comments on anticipated outputs and outcomes

Comments on outcomes and monitoring from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

TfL Response

Description of the anticipated outcomes

Chapter 6 of the draft MTS describes the anticipated outputs and outcomes of the MTS in 2031 compared to 2006 levels. The anticipated outputs and outcomes as described in Chapter 6 are not targets for the purpose of s 41 (9) of the GLA Act 1999, and TfL recommends that this is clarified in the MTS.

Additional targets

The strategy is a broad outcome focused strategy which should be flexible and allow room for changes. Having too many targets can reduce flexibility, especially as budget and future challenges such as societal change which has impacts on trip rates are not known. That said, the strategy sets out ambitious policies to increase road safety and to increase walking, cycling, and the modal share of public transport. Therefore it is not recommended that there are further additions or changes to the PD MTS on this issue. The issue of interim targets for CO₂ emissions reduction is addressed in the 'Climate Change' section of this chapter.

Additional indicators, definitions and monitoring

Some respondents suggested additional indicators including for health inequalities, better streets and smarter travel. The MTS outcome indicators are set out in Chapter 9 of the MTS (and please see section on the Olympics in this report with regard to a new indicator). TfL's key performance indicators are published annually in the *Travel in London* report and TfL's *Business Plan* respectively. Information on how the indicators are defined is given in the *Travel in London* report, which provides a wide range of information about key trends in travel and the performance of the transport network in the Capital. It is not recommended that further changes or additions are made on this issue.

Support

TfL welcomes support for the expected strategic outcomes which were set out in the public draft MTS.

TfL Recommendations

Amend section 9.1.2 to highlight that the anticipated outcomes described in Chapter 6 are not statutory targets

39. Funding the strategy

Section 8.2 of the Public Draft MTS describes the approach to funding the strategy. Policy 30, 31, 32, 33, 34 and 35 and Proposals 50-57 take this approach forward.

Analysis of responses

Seventy three stakeholders commented on issues relevant to this section. These were: Age Concern London, ASLEF, Association for Consultancy and Engineering, Association of Train Operating Companies, Better Bankside, Campaign to Protect Rural England, Confederation of British Industry, Cllr Elizabeth Santry -Haringey, Cllr Rahman Khan - Haringey), Department for Transport, Energy Saving Trust, English Heritage, Environment Agency, Federation of Small Businesses, Friends of Capital Transport Campaign, Guide Dogs for the Blind Association, Heathrow Airport Limited, Inclusion London, Jenny Jones AM, London Assembly, London Borough of Barking & Dagenham, London Borough of Barnet, London Borough of Bexley, London Borough of Brent, London Borough of Bromley, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Greenwich, London Borough of Hackney, London Borough of Haringey, London Borough of Havering, London Borough of Hounslow, London Borough of Islington, London Borough of Merton, London Borough of Newham, London Borough of Southwark, London Borough of Sutton, London Borough of Tower Hamlets, London Borough of Wandsworth, London Chamber of Commerce and Industry, London Civic Forum, London Civic Forum and Youth Campaign for Better Transport, London Cycling Campaign, London First, London Forum of Amenity and Civic Societies, London Liberal Democrats, London TravelWatch, London Sustainable Development Commission, National Express East Anglia and C2C, Network Rail, North London Strategic Alliance, Olympic Delivery Authority (ODA), Park Royal Partnership, RAC Foundation, Richard Tracey AM, Roadpeace, Royal Borough of Kingston upon Thames, Royal Free Hampstead NHS Trust, Steve O'Connell AM, Southwest London Transport Consortium, Thames Gateway London Partnership, The Chartered Institution of Highways and Transportation, The Crown Estate, The South London Partnership, Transport for All, Transport Planning Society, Transport salaried staff association, Trade Union Congress, Unite, Valerie Shawcross AM and Westminster City Council.

Question 2 of the public questionnaire invited respondents to specify any other measures which they considered would bring benefit to travelling in London; of those who made a comment here, two per cent commented on financing transport schemes. The issues raised in the public responses were broadly similar to those raised by stakeholders. In the email and letter responses from businesses, half of the 24 respondents made a comment on financing transport schemes. These comments

stated support for transport schemes proposed in the Public Draft MTS, but asked for more detail on how these would be financed

Issues raised

The following is a list of the issues raised:

Resources

- The impact on borough funding and available borough resources
- Concern about financial burden of Crossrail and implications for availability of S106 money for other priorities
- Call for more detail on funding in MTS around prioritisation and ring fencing
- Comments about availability of funding and financing source, different funding mechanisms and concern about commitments to fund transport projects
- Want LIPs funding available to organisations other than boroughs

Mode

- Concern raised about potential reduction in bus subsidy
- Concern about the language used in the MTS to describe public funding of transport services in London, with funding for buses a subsidy
- Concern over funding of Tube upgrade due to problems with PPP

Overarching funding

- Comment that the MTS needs to be more ambitious with plans despite funding issue
- Comment that public ownership is best place to deliver an efficient and reliable public transport network
- Commenting on the financial and economic context for the MTS
- A comment supporting a particular part of the funding section of the MTS

Financial Management

- Concern over how contractors will be appointed for transport projects
- Concern about asset management approach
- Achievement of vital schemes e.g. Crossrail 1 and 2, Thameslink and HS2 should not be wholly subject to TfL controlled capital funding streams. It is requested that this risk is made explicit in the MTS

TfL Response

Resources

The impact on borough funding is dealt with in the TfL business plan and Local Implementation Plans. Boroughs will be expected to deliver outcomes and will be given the flexibility on how best to achieve this. TfL recommends no change.

Crossrail is a key element of the MTS and delivers benefits across London. The funding settlement for Crossrail has already been agreed and there has also been a separate consultation on Crossrail funding with government and is therefore it is not a matter for the MTS. TfL recommends no change.

The MTS is an outcome-focussed document and already considers the various needs of London which would be considered in any prioritisation of funding, ring fencing. There is not one set of priorities for whole of London and different measures will be needed for different locations. Also, monitoring will indicate where more resources are needed from year to year, so priorities will change over time, and the detail of how these are delivered will also change. It is not appropriate to be prescriptive about detailed measures for a twenty-year timescale; the MTS does, though, set out the overarching framework. Current allocation of funding, and ring fencing has resulted from TfL business planning process. Any future prioritisation of funding will be addressed through the TfL business planning process and LIPs. TfL recommends no change.

TfL accepts that there are potentially additional sources of funding and therefore recommends including reference to them in section 8.2.7 [8.2.8]. TfL, with relevant stakeholders will consider other funding mechanisms, and current wording (with the changes) within the PD MTS will provide sufficient flexibility to use a range of mechanisms. The detail of funding matters for TfL are dealt with through the annual Mayor's budget and TfL business planning process.

Currently there are no plans in allowing agencies other than the boroughs to receive LIP funding. There will be an opportunity to influence the availability of funding to non boroughs through Sub-regional Transport Plans. TfL recommends no change.

Mode

The approach set out in the Public Draft MTS focuses upon more efficient management of the bus subsidy rather than a reduction in the level of bus service. TfL recommends no change to policies in the PD MTS.

The PD MTS refers to buses operating with a subsidy. Stating that bus services operate with a subsidy is not a judgement about the comparative importance of bus and Tube services. TfL recommends no change.

TfL accepts that there is concern about funding the Tube upgrades following the failure of Metronet and problems with current upgrade. TfL therefore recommends having a new sub-section in 8.2 about Tube funding and a new policy (Policy 33 in the MTS) about securing investment to deliver the transformation of the Tube.

Overarching funding

The MTS is ambitious with regard to the Mayor's overall vision for London and contains a number of challenging targets, for example in the target for overall reduction in CO₂ emissions. However, it must have regard to the current and likely future economic and financial context. For this reason the MTS Implementation Plan sets out clearly to what extent various schemes are funded, alongside the potential timescales for their implementation. TfL recommends no change.

The principle over whether public transport is publicly or privately owned is not a matter for the MTS; it is dealt with through detailed procurement and business planning process. TfL therefore recommends no change.

The current financial and economic context is important in so far as it affects the delivery of transport projects. Given the 20-year timescale of this strategy, it is important to have regard to the longer term economic context, and TfL recommends no change.

Financial Management

The appointment of contractors is dealt with in individual project procurement and contractual arrangements. TfL recommends no change.

Asset management is important in delivering value for money and maintaining the current transport network. This is addressed through TfL's business planning process. TfL recommends no change.

Crossrail 1 and 2, Thameslink and HS2 are not entirely the responsibility of TfL. Therefore they are not wholly subject to TfL controlled capital funding streams, and it is not appropriate to include considerations of risk to the funding of those projects. TfL recommends no change.

TfL Recommendations

Amend the section 8.2.8 [8.2.7] to include other funding sources for transport projects and initiatives

Add new section 8.2.4 and new Policy 33 to secure funding for the Tube upgrades

40. Cancelled Schemes

Comments on cancelled schemes do not relate to a specific section of the Public Draft MTS. However, comments on the issues listed below were made within responses and are therefore included here for completeness. Additionally, comments related to Thames Gateway Bridge may be found in the section on River Crossings and comments about Tramlink extensions, the East London Line and DLR Dagenham Dock extension are considered in the Rail section.

Analysis of responses

Nine stakeholders commented on issues relevant to this section. These were:

ASLEF, London Borough of Camden, London Borough of Greenwich, London Borough of Lambeth, London Borough of Southwark, London Liberal Democrats, London TravelWatch, Thames Gateway London Partnership and Westminster City Council.

Comments on cancelled schemes from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- Cross River Tram
- Oxford Street Tram
- Greenwich Waterfront Transit (GWT)

TfL Response

Cross River Tram

Given the lack of funding available to implement the project and the likelihood of not securing additional third party funding, TfL is not in a position to develop the Cross River Tram scheme. For this reason it has not been included in the PD MTS. TfL will continue to work with the boroughs, the LDA and the GLA to seek improvements in the local areas through the sub-regional transport plans. The TfL Business Plan sets out a number of transport improvements to the communities along the proposed routes including the increased capacity and more frequent services to come on the Northern, Victoria and Piccadilly lines. Proposal 22 supports a further review of a southern extension of the Bakerloo line. TfL recommends no changes.

Oxford Street Tram

With regard to an Oxford Street tram scheme, although TfL completed a feasibility study investigating the potential for this some time ago, it has not been developed any further and is not included in the PD MTS. TfL continues to work closely with all relevant parties to identify ways of improving the public realm along Oxford Street and ensuring the needs of all users are being met. TfL recommends no changes.

Greenwich Waterfront Transit

The Greenwich Waterfront Transit scheme is no longer funded and is not included in the PD MTS as a specific scheme. However the benefits of the transit scheme in terms of improved bus accessibility, reliability and public realm are supported in the strategy and TfL continues to work with the London Borough of Greenwich and other partners to identify how these improvements can be delivered. TfL recommends no changes.

TfL recommendations

No recommended changes

41. Working with Boroughs; LIPs and Sub-regional Transport Plans

Section 7.3 of the Public Draft MTS describes the delivery processes including the overall approach to delivery, the sub-regional strategy development and local delivery through Local Implementation Plans (LIPs). Policies 27-29 take this approach forward.

Analysis of responses

Thirty-three stakeholders commented on issues relevant to this section. These were:

Age Concern London, Better Bankside, Community Transport Association, English Heritage, Friends of Capital Transport Campaign, London Borough of Barking and Dagenham, London Borough of Barnet, London Borough of Bexley, London Borough of Brent, London Borough of Camden, London Borough of Croydon, London Borough of Harrow, London Borough of Havering, London Borough of Hillingdon, London Borough of Lewisham, London Borough of Merton, London Borough of Wandsworth, London Civic Forum, London Councils, London TravelWatch, London Sustainable Development Commission, North London Strategic Alliance, Olympic Delivery Authority, Park Royal Partnership, RAC Foundation, Royal Borough of Kensington and Chelsea South London Partnership, SWELTRAC, Transport for All, TSSA, West London Partnership and Westminster City Council.

Comments on the boroughs, LIPs and Sub-regional Transport Plans from the public, businesses and other organisations made up less than one per cent of all public responses to the consultation. Five businesses made comments in consultation responses on this issue, which were broadly consistent with the stakeholder comments.

Issues raised

The following is a list of the issues raised:

- LIPs context and contents
- LIPs and funding
- Sub-regional transport plan context
- Balancing local and strategic issues

TfL Response

LIPs context and contents

The Public Draft MTS recognises that a significant element of the MTS will be delivered by the London boroughs with each borough setting out its contribution in its

LIP. It contains a section on LIPs (section 7.3.3) that describes the framework for LIPs. Policy 29 sets out the five goals boroughs are required to address in their LIPs.

The current round of LIPs expires in April 2011. The public draft MTS recognises that new LIPs must be prepared as soon as reasonably practicable after MTS is published to ensure the second round of LIPs is in place before the current round expires.

TfL and London Councils consulted on 'Draft Guidance for the Second Round of LIPs' alongside the consultation on the public draft MTS. Overall the balance of responses suggests that there is general support and acceptance of the approach set out in the draft guidance. Final guidance will be published alongside MTS.

Section 7.3.3 sets out the context and timings for LIP preparation once the MTS is published. TfL consider the measures set out in the PD MTS to be effective with regard to LIPs, therefore no change is recommended.

LIPs funding

There is greater flexibility built into the second round of LIPs for boroughs to allocate funding. The work on the second round LIPs builds in the reforms TfL has introduced during 2009/10 including allocating £100k per borough to spend on transport priorities of their choice, reducing the number of programmes from 23 to five, introducing formula funding for the majority of the LIP funding and confirming the funding levels for the next three years. The three year LIPs funding commitment enables boroughs to deliver the Mayor's and their own local priorities. For some projects, for example the Cycle Superhighway proposals, specific additional funding will be provided and where practical TfL will seek additional support from other sources, such as the Plugged in Places programme for electric vehicle infrastructure. TfL considers the measures set out in the PD MTS to be effective with regard to LIPs, therefore no change is recommended.

Sub-regional transport plan context

TfL notes the support for the sub-regional transport plans. Sub-regional transport plans are described in section 7.3.2 and addressed in Policy 28.

The sub-regional transport plans will be live documents that influence LIPs, and third party funding, as well as helping to guide priorities for TfL's future Business Plans. They will provide a link between MTS and LIPs and a means to identify common issues, as well as issues that cross administrative boundaries such as local river crossings and access to key locations. The sub-regional boundaries are intentionally 'fuzzy' to allow boroughs to participate in those sub-regions whose policies affect them and TfL notes the borough support for this approach.

The first stage in the development of the sub-regional transport plans was the publication in February 2010 of an interim report on transport challenges and

opportunities for each sub-region. Boroughs will be able to use this information in the preparation of their second round LIPs and there will be further analysis and collaboration between TfL and stakeholders on the issues explored and the development and assessment of options.

TfL consider MTS measures to be consistent with regard to the development of sub-regional transport plans, therefore no change is recommended.

Balancing local and strategic issues

The sub-regional transport plans will provide an opportunity to balance local and strategic needs, for example the potential conflict between local journeys and that of long-distance commuting. In investigating feasible scheme and policy priorities to address the MTS and sub-regional challenges, the impacts of such priorities will be considered in more detail including at the local, sub-regional and Londonwide level. TfL considers the measures set out in the PD MTS to be effective with regard to balancing local and strategic issues, therefore no change is recommended.

TfL notes the support for the overall approach to delivery within the spirit of the London City Charter.

TfL Recommendations

No recommended changes

42. Comments in support of the Mayor's Vision for Transport in London

The Mayor's vision for transport in London is set out in Chapter 2 of the Public Draft MTS and the six goals for the achievement of this vision are set out in Section 2.2.

Analysis of responses

Fifty-eight stakeholders made positive comments about the Mayor's vision for transport. These were:

Association for Consultancy and Engineering (ACE), Association of International Courier and Express Services, ATOC, Better Bankside, Campaign to Protect Rural England, CBI, Community Transport Association, Enfield NHS Trust, Environment Agency, Heathrow Airport Limited, Hertfordshire County Council, Kent County Council, London Assembly, London Borough of Bexley, London Borough of Brent, London Borough of Bromley, London Borough of Croydon, London Borough of Enfield, London Borough of Harrow, London Borough of Havering, London Borough of Greenwich, London Borough of Hammersmith & Fulham, London Borough of Hillingdon, London Borough of Lambeth, London Borough of Newham, London Borough of Richmond upon Thames, London Borough of Sutton, London Borough of Southwark, London Borough of Waltham Forest, London Borough of Wandsworth, London Civic Forum, London Civic Forum and Youth Campaign for Better Transport, London Cycling Campaign, London Development Agency, London Liberal Democrats, LSDC, NHS Lambeth, NHS London, NHS Tower Hamlets, Olympic Delivery Authority (ODA), Richard Tracey Conservative Spokesperson London Assembly, Royal Borough of Kensington & Chelsea, South East England Regional Transport Board, Steve O'Connell AM, Sustrans, SWELTRAC, Thames Gateway London Partnership, The Chartered Institution of Highways and Transportation, The Crown Estate, The Ramblers, The South London Partnership, Transport for All, Transport Planning Society, TUC, University of East London, Valerie Shawcross AM and Westminster City Council

Comments from the public, businesses and other organisations coded as 'positive' made up less than two per cent of all public responses to the consultation. However, there were positive comments made on specific aspects of the draft MTS which are addressed in the other sections of this chapter. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- Support for the general direction of the public draft MTS
- Support for the six goals of the public draft MTS

- Noting that the overarching objectives of the draft MTS are reflected in stakeholders' own strategies and approaches

TfL Response

The support is noted and welcomed.

TfL Recommendations

No recommended changes

43. Negative and Other Comments about the MTS

These comments pertain to either the Public Draft MTS as a whole, or specific sections within it.

Analysis of responses

Twenty-two stakeholders commented on this issue. These were:

Association of British Drivers, Campaign for Better Transport, Campaign to Protect Rural England, Cllr Liz Santry – Haringey, Cllr Rahman Khan – Haringey, East of England Development Agency, Friends of Capital Transport Campaign, London Borough of Bexley, London Borough of Camden, London Borough of Ealing, London Borough of Hackney, London Borough of Hillingdon, London Borough of Islington, London Borough of Merton, London Borough of Southwark, London Councils, London Forum of Amenity and Civic Societies, LSDC, Royal Borough of Kingston upon Thames, South East England Regional Transport Board, Unite and Valerie Shawcross AM.

Comments from the public, businesses and other organisations coded as ‘negative’ made up less than two per cent of all public responses to the consultation. However, there were critical comments made on specific aspects of the draft MTS which are addressed in the other sections of this chapter. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised:

- Lack of consistency between the public draft MTS, draft replacement London Plan and public draft EDS
- Lacks reference to Government plans for a Sustainable Transport System
- Format of PD MTS
- Need for clearer link between policies and proposals
- Those living outside London, the less affluent and drivers are insufficiently considered
- Balancing local and long distance travel
- MTS lacks ambition
- Level of detail provided in MTS (too much, too little)
- Lack of detail on schemes post-2017
- Does not define transport need and link proposals to this
- Priority should not be given to ‘headline-grabbing’ schemes

TfL Response

Consistency between the MTS, London Plan and EDS

The Mayoral strategies must have regard to each other and the development of the three Mayoral strategies has been closely aligned since the Mayor decided to produce them and they have been produced using a shared evidence base. Updates to this evidence are described in Chapter 4 of this report.

National policy

With regard to national transport policy, as described in Section 2.1, the PD MTS is consistent with national objectives as set out in 'Delivering a Sustainable Transport System' (DaSTS), and no change is recommended.

Format

Comments about the format concerned the evidence base and some inconsistency in use of terms: the shared evidence base was available during the consultation and inconsistencies have been addressed in preparing the revised text, as described in Chapter 4 of this report.

Linking policies and proposals

In both the public draft and the MTS, each policy is followed by the proposals that take it forward, and this is also set out in a table at Annex B, and no further addition is recommended.

Scope of MTS

The Mayor is required to consider the transport needs of all people living or working in, or visiting Greater London, and the PD MTS addresses these.

Local and long-distance travel

The transport geography approach (Section 3.1) recognises the multiple levels that London operates at, from international connectivity to local journeys, and no change is recommended.

Ambition and level of detail

The Mayor sets out his vision and ambition for transport in the Foreword, and has set out his overarching vision for London is set out in Section 2.1. The MTS is a long-term, 20-year Strategy, which strikes a balance between providing certainty and a clear framework with the need to be flexible enough to respond to future circumstances and local priorities.

The MTS sets out policies and proposals but not the details of scheme implementation. Sections 8.1 and 8.2 set out the funding approach and sources for the strategy, and the Implementation Plan in Section 7 indicates the likely timescales for projects and whether these are currently funded. It is not appropriate to provide detail on projects beyond the scope of TfL's current Business Plan (2009/10 – 2017/18), because funding is not certain beyond this date. TfL recommends no change.

Transport need

Projections are based on transport demand rather than need, although there are specific policies to address improving accessibility, tackling deprivation and supporting regeneration (Policies 21-23). The MTS sets out the policies and proposals to meet the transport demand outlined in section 4.2 to facilitate the growth assumed in the London Plan. TfL recommends no change.

Media attention

The strategy sets out a very wide range of policies and proposals. It is to be expected that certain measures will attract more attention from the media and the public than others.

TfL Recommendations

Consistency checks and updates of data as described in Chapter 4 of this report

44. Links to Other Strategies and Agencies

There are no specific sections in the Public Draft MTS on other strategies relevant to the draft MTS or on how TfL and the GLA will work with other agencies, rather, references to these are made throughout the strategy as is appropriate. Comments made about this issue, then, relate to various sections of the draft MTS, details of which are given below.

Comments related to how TfL works with the NHS and how health-related matters are addressed in the MTS are discussed in the Health section of Chapter 3.

Analysis of responses

Twenty-eight stakeholders commented on issues relevant to this section. These were:

Age Concern London, Association for Consultancy and Engineering (ACE), Aviation Environment Federation (AEF), British Waterways, Campaign to Protect Rural England (CPRE), Chartered Institute of Environmental Health (CIEH), Commissioning Support for London – NHS, Community Transport Association, Energy Saving Trust, Friends of Capital Transport Campaign, Heathrow Airport Limited, Institute of Advanced Motorists (IAM), Institute of Civil Engineers (ICE), London Borough of Bromley, London Borough of Camden, London Borough of Croydon, London Borough of Havering, London Borough of Lambeth, London Borough of Southwark, London Councils, NHS Lambeth, NHS London, NHS Tower Hamlets, Society of Motor Manufacturers and Traders Ltd (SMMT), South East England Regional Transport Board, SWELTRAC, The Ramblers, Transport for All and Valerie Shawcross AM

Comments on this issue from the public, businesses and other organisations made up less than two per cent of all public responses to the consultation. The issues raised in the public responses were broadly similar to those raised by stakeholders.

Issues raised

The following is a list of issues raised:

- The need for TfL and other GLA bodies to work with other relevant agencies in order to deliver the Strategy
- Working with local authorities contiguous to London
- Linking the MTS to the draft Mayor's Air Quality Strategy (MAQS)
- A suggested wording amendment to paragraph 64 of the public draft MTS with regard to regional agencies in South East England

TfL Response

TfL accepts that it is important to work with other agencies in order to effectively deliver the Mayor's vision for London, and will continue to do so, including with local authorities in the wider south-east via the Inter-Regional Forum.

The development of the Mayor's new air quality and transport strategies has been closely aligned, and the transport policies and proposals set out in Section 5.21 [5.19] of the MTS have been aligned with those in the draft MAQs, which was recently published for public and stakeholder consultation.

It is recommended that minor changes are made in order to correct some factual errors.

TfL Recommendations

Clarify in Section 1.5 that the MTS has had regard to the Mayor's other strategies, including the emerging draft Air Quality Strategy, Climate Change Mitigation and Energy Strategy, Climate Change Adaptation Strategy, Waste Strategy and Health Inequalities Strategy

Minor wording change to section 3.1.2

45. Comments on Data used in the Public Draft MTS

Chapter 4 of this report describes the source of the population and employment data underpinning the Public Draft MTS and how updates have been reflected in the revised text.

Three stakeholders made specific comments about the data used in the draft MTS, which are addressed below. These were the South East of England Regional Transport Board, the London Borough of Barking & Dagenham and the London Borough of Ealing. There were no public responses on this issue.

Issues raised

- In Figure 16, the forecast regional population growth in the South East over the period 2006-2031 should read 1.6 million, not 1.3 million
- Figure 14 shows that Barking Riverside will only experience a growth of 2-3000 people by 2031 and South Dagenham will only experience a growth of 0-1000 people. This is at odds with the London Plan which identifies a capacity for 25,000 new homes in London Riverside. Of these approximately 20,000 will be in Barking & Dagenham and these are reflected in the borough's housing target of 1510 new homes per year. Similarly Figure 15 shows that Dagenham Dock will experience a decline in employment by 2031 despite the fact that good progress is being made with implementing the Sustainable Industrial Park
- Robustness of the population and employment forecasts and scenarios upon which the plans are based – there are some concerns that the population forecasts may underestimate employment growth and another source is suggested

TfL Response

On the first issue, it is recommended that Figure 16 be revised to correct the forecast growth in the South East.

With regard to the second issue, the spatial allocation of population and employment data has now been updated, as described in Chapter 4. This reflects an updated population projection from the GLA in January 2010 which results in a small reduction in the overall population (reducing by 0.2%) but also changes in borough level growth. TfL has also refined its assumptions of growth allocated at a detailed level below borough level, based on updated site data. In the detailed allocation underlying the latest modelling, the population growth allocated to London Riverside in the London Borough of Barking & Dagenham now exceeds 50,000 people. Further growth in population is also reflected in London Riverside in the London Borough of Havering. The number of jobs allocated to London Riverside has also been

reviewed, and the current figures assume over 30,000 jobs in the 2007 baseline and further growth in addition to this.

Finally, with regard to the suggestion of alternative sources of data are used, it may be useful to first reiterate the source of the data used in the preparation of MTS and how this has been updated. In preparing the MTS, TfL has used population and employment growth assumptions provided by the GLA. In January 2010 the GLA produced an updated set of population projections, which included some revisions to borough population projections. GLA employment projections and the allocation to London boroughs were set out in GLA Working Paper 39, published in November 2010. TfL has reflected the updated borough population and employment projections in its modelling and examined the impact of the MTS. This showed that the transport impacts of the updated figures were not significant and did not result in any changes to the policies and proposals in the MTS nor to the headline figures.

The GLA provide a lead on population and employment projections, which have been used in the MTS and in the London Plan and Economic Development strategy. In order to ensure consistency, it would not therefore be appropriate for TfL to use other sources of data for these figures. Any representations in relation to alternative growth assumptions to the London Plan are in the first instance a matter for consideration by the GLA. TfL therefore recommends no change.

TfL Recommendations

Update Figure 16 as described above

4. Other Issues of relevance to the development of the draft MTS

4.1.1 There are a number of other factors which have a bearing on the final publication of the MTS. The MTS must align with other Mayoral strategies and national policy.

4.1.2 Since the publication of the Public Draft MTS there have been developments in these areas, which fall into three broad categories:

- Modelling: updated population and employment forecasts from the GLA
- Other Mayoral strategies: the MTS must align with the other Mayoral strategies, in particular the London Plan, the Economic Development Strategy (as described in Chapter 1) and the Mayor's Air Quality Strategy (see below)
- National policy: developments on Climate Change and High Speed 2
- Other updates, corrections and clarifications

The London Plan – updated population and employment forecasts

4.1.3 Modelling and analysis for the draft MTS was based on population and employment forecast data supplied by the GLA. Figure 13 of the draft MTS summarises the spatial distribution of forecast population and employment growth from 2007 to 2031. These projections were consistent with figures underpinning the draft London Plan and draft Economic Development Strategy.

4.1.4 In January 2010 the GLA released updated population projections, reported in DMAG update note 01-2010 and included in the GLA Datastore⁴. This update included a small change to the projected population to 2031 at a London level (reducing the total by only 0.2%) and larger changes in the distribution of population between London boroughs. TfL examined the impact of this updated population projection and also refinements to the sub-borough allocation of both population and jobs, on the MTS analysis. It was found that the updates to the population and employment figures had an insignificant impact on the MTS.

4.1.5 Figures 13 and 14 have been updated to reflect these latest population figures of January 2010. There was no change to employment growth at borough level. Figures 14 and 15 have been revised to show growth at borough level (the Public Draft MTS had shown this at zonal level), and in Figure 14, to reflect the latest population figures.

⁴ <http://data.london.gov.uk/>

The Mayor's Air Quality Strategy (MAQS)

- 4.1.6 The MAQS⁵ looks at air quality in London more broadly and considers commercial, industrial, domestic and construction sources of air pollutant emissions as well as transport sources. Improving air quality and achieving the EU limit values requires reductions in emissions from all these sources. By looking at all sources together it is possible to ensure that the best overall contribution to improving air quality is delivered without disproportionately affecting one sector. Consequently, it is appropriate that the MAQS contains the detail about air quality measures and this be reflected at a high level in the MTS.
- 4.1.7 Stakeholder comments on the MTS have been shared with colleagues preparing the MAQS; many of these comments will be addressed there directly. The draft MAQS was published for public and stakeholder consultation on 28 March 2010 giving stakeholders an additional opportunity to comment. The draft contains greater detail, which many stakeholders requested.
- 4.1.8 In addition to the changes set out in Chapter 3 which TfL recommends as a result of its analysis of stakeholder representations, TfL also recommends a number of changes to the air quality section in the MTS to reflect policy development work undertaken for the MAQS, the latest emissions modelling and to better reflect the Mayor's statutory duties. Because some of the numbering has changed between the two versions of the strategy, in the section below, references are given first to the MTS, then followed in square brackets by the Public Draft MTS references:
- Figures 57 and 58 [54 and 55] have been updated to reflect the latest baseline concentrations modelling while Figures 59 and 60 [56 and 57] have been updated to reflect the emissions impact of the emerging detailed transport policies and proposals contained within the draft MAQS and reflected in MTS
 - The text accompanying Figures 59 and 60 [56 and 57] has also been updated to reflect the latest modelling outputs
 - To reflect the latest policy development work, more information has been included on local measures in Section 5.21.6 [5.19.6]

⁵ <http://www.london.gov.uk/priorities/environment/vision-strategy/air-quality>

- In light of the proposed changes to the LEZ scheme, the naming of the phases has been amended to better reflect the vehicles affected in Section 5.21.7 [5.19.7]
- Section 5.21.2 [5.19.2] has been updated to better reflect the Mayor's statutory duties.

Climate change publications

4.1.9 Since the launch of the public consultation for the MTS, London Plan and Economic Development Strategy a number of climate change related publications and events have taken place, spurred in part by the United Nations Climate Change conference in Copenhagen in December 2009. The following provides a summary of publications and events since October 2009, in chronological order, and whether TfL recommends any changes to the MTS arising from these. As in the MAQs section above, MTS references are given first, followed by Public Draft MTS references in square brackets, where these are different.

October 2009: Committee on Climate Change (CCC) first annual progress report on meeting the UK Carbon Budgets⁶

4.1.10 This report introduced scenarios of increased levels of Government ambition. The scenario of 'extended' ambition was applied to London. The following scenario parameters are noteworthy in terms of impact on transport related CO₂ emissions in London:

- 2.6 million electric vehicles (EV)/ plug-in electric vehicle (PHEV) nationwide by 2022, and around 28 per cent of new vehicle sales EVs/ PHEVs by 2022
- 200g CO₂/ KWh National Grid electricity supply by 2025
- Marginally greater impact achieved through smarter travel initiatives (including greater resource input) than assumed in draft MTS

4.1.11 The CCC analysis assumed energy consumption of EVs of 0.2 KWh/ km. Analysis in support of the draft MTS assumed energy consumption of 0.16 KWh/ km (sourced from the October 2008 DfT/BERR report *Investigation into the Scope for the Transport Sector to Switch to Electric Vehicles and Plug-in Hybrid Vehicles*)⁷. Following review of energy demand published by vehicle manufacturers when unveiling new EVs TfL has updated the MTS analysis to be consistent with the CCC. TfL recommends changes to Figures 61 and 63 [58 and 59] to reflect this.

⁶ <http://www.theccc.org.uk/reports/progress-reports>

⁷ <http://www.dft.gov.uk/pgr/scienceresearch/technology/lowcarbonelecvehicles/>

December 2009: United Nations Copenhagen Summit on Climate Change

4.1.12 TfL recommends changes to Section 5.22.7 [5.20.7] to better reflect the failure to reach international agreement on aviation and shipping emissions.

*December 2009: London's Electric Vehicle Infrastructure Strategy for consultation*⁸

4.1.13 TfL recommends that reference is made to London's Electric Vehicle Infrastructure Strategy in MTS as a signpost to further details on plans for London's EV recharging network.

December 2009: Committee on Climate Change (CCC): Meeting the UK aviation target – options for reducing emissions to 2050

4.1.14 Further data on the projected future growth in aviation CO₂ emissions and potential mitigation has been reviewed. However, a combination of lack of agreement at the United Nations Climate Change conference in Copenhagen and this report has seen greater awareness of the challenge in securing a sustainable aviation industry. Therefore, TfL recommends a change to Figure 63 [59] and additional text in Section 5.22 [5.20] to reflect this.

*January 2010: Government response to the first annual progress report of the Committee on Climate Change*⁹

4.1.15 A supportive response from Government, however no firm commitment to move to a scenario of greater ambition as suggested by the CCC. No change recommended to MTS.

*February 2010: Publication of the Mayor's Climate Change Mitigation and Energy Strategy (CCMES) for Assembly and Functional Body Consultation*¹⁰

⁸ <http://www.london.gov.uk/electricvehicles/charging/>

⁹ <http://www.official-documents.gov.uk/document/other/9780108508738/9780108508738.asp>

¹⁰ <http://www.london.gov.uk/priorities/environment/climate-change/climate-change-mitigation-strategy>

4.1.16 TfL recommends a number of changes to the MTS to reflect the publication of the draft CCMES, including to Figure 61 [58] and references to this strategy in Chapters 4 and 5. The CCMES identifies greater CO₂ emissions savings potential from the 'Homes' sector than had been assumed in CCAP. As a result the CO₂ emissions reduction contributions required from the 'transport' and 'workplaces' sectors reduce. Therefore TfL recommends the MTS should target Transport sector related 2025 CO₂ emissions as per the CCMES (i.e. emissions target not as low as draft MTS). The revised transport sector target is more realistically attainable, approximately halving the CO₂ policy gap identified in the draft MTS and enabling the final MTS to set out a policy pathway to meeting the target. TfL proposes that the transport sector CO₂ emissions target be presented as a range between projected emissions as per CCMES (CCMES projected emissions are as per the draft MTS, together with an extended level of Government ambition), and the level of transport sector emissions required if the transport sector in isolation were to make the further emissions reduction necessary to move from the 57 per cent reduction (1990 – 2025) projected in CCMES to the target of 60 per cent. The resulting range is 1.3m tonnes of CO₂.

*February 2010: Publication of the Mayor's Climate Change Adaptation Strategy for public consultation*¹¹

4.1.17 This strategy is out for public consultation until 9 May 2010 and is consistent with MTS. TfL recommends a change to Chapters 4 and 5 of the MTS to include reference to this strategy.

*February 2010: Publication of further detail on how Government intend to use the "Adaptation Reporting Power" as legislated in the 2008 Climate Change Act.*¹²

4.1.18 TfL recommends changes to Chapter 4 of the MTS to reflect further details on the GLA/ TfL reporting requirement.

February 2010: Finalisation of London Emissions of Greenhouse Gases Inventory (2008)

¹¹ <http://www.london.gov.uk/climatechange/>

¹² <http://www.defra.gov.uk/environment/climate/legislation/reporting.htm>

4.1.19 CCAP and the MTS public consultation draft used a forward projection of 2004/05 LEGGI data to estimate 2006 emissions. The draft CCMES for consultation with the Assembly and Functional Bodies presents LEGGI data from the 2006 survey. 2008 LEGGI data was made available in the days following publication of CCMES for Assembly and Functional Bodies consultation. TfL recommends that Figure 28 is updated to reflect the 2008 LEGGI data.

High Speed 2

4.1.20 In March 2010, the Government published the High Speed Rail Command Paper¹³, which set out proposals for delivering a second High Speed Rail line (known as HS2) from London to Birmingham. The proposals contained in the Command Report and the accompanying documents, propose a new line starting from a significantly enlarged and redeveloped Euston station (for which mitigation measures will be part of the solution). From there, it will run in a tunnel to Old Oak Common, where a major new interchange is proposed with Crossrail on the Great Western Main Line, which would also provide access to Heathrow. From Old Oak Common, the line would head parallel to the Central Line, out of London through Ruislip and onto Birmingham.

4.1.21 A second phase, to deliver a 'Y-shaped' network, the detail of which will be developed over the next 12 months, would eventually see the new line extended onto Manchester and Leeds. TfL recommends that the MTS is updated to reflect the publication of the Command Paper. However, no specific reference to the proposed interchange at Old Oak Common has been added, reflecting the fact that more research will be needed in order to determine the optimum location for an interchange with Crossrail in west London. Although HS2 is not a TfL operated service, the Mayor and TfL have a significant interest in domestic high speed rail, given the potential implications on dispersal and capacity at the London terminals and any other interchange stations in London. Updates to Section 5.2.2 have been made to reflect the publication of the Command Paper.

¹³ <http://www.dft.gov.uk/pgr/rail/pi/highspeedrail/commandpaper/>

Other updates, corrections and clarifications

- 4.1.22 In addition to the matters outlined above which have a bearing on the development of MTS, there are a number of minor changes between the Public Draft MTS published in October 2009 and the MTS as revised following the public and stakeholder consultation. These are described briefly below, but this is not intended to be an exhaustive list. It will also be useful to compare the Public Draft MTS and the MTS, as well as considering the Recommendations contained within Chapter 3 of this report.
- 4.1.23 Sections which were only relevant when the Public Draft MTS was published for consultation have been deleted. This includes the set of ‘Stakeholders Questions’ and details of how to respond to the consultation, and the Next Steps section describing the arrangements for finalising the MTS.
- 4.1.24 There have also been some changes to the text to reflect developments during the consultation period. For example, from January 2010, Oyster card was accepted on National Rail in London.
- 4.1.25 A number of photographs have been replaced in order to better reflect the content of the MTS, and, where appropriate, Figures have been updated to improve clarity. Spelling and grammatical errors have been corrected, and the Glossary has been expanded to include more terms and aid reader understanding. As a consequence of these changes, and the other changes described in Chapter 3, there has been some renumbering of sections, policies, proposals and figures within the document, as well as a renumbering of the paragraphs.
- 4.1.26 A new section has been added on the Olympic Legacy, and a strategic indicator for the Games’ legacy has been included. A new section on London Underground funding has been included in Chapter 8, alongside the section on bus and rail funding that were in the Public Draft MTS.

5. Next Steps

5.1 Introduction

- 5.1.1 This report is TfL's analysis of the issues raised during the public and stakeholder consultation on the Public Draft MTS. It contains TfL's recommendations for changes to the text of the Strategy for the Mayor's consideration.
- 5.1.2 Copies of all stakeholder representations, and a database of the responses from the public, businesses and other organisations have also been made available to the Mayor.
- 5.1.3 It is important to bear in mind that the Mayor's Transport Strategy is intended to provide an overarching framework for transport for the next twenty years. It is a *strategic* document and does not operate in isolation. There are numerous other Mayoral and TfL strategies, service plans, and local agreements which contribute to the planning, management and development of London's transport infrastructure. Many of the issues raised in the consultation are more appropriate to these documents, for example the Local Improvement Plans, or the TfL Business Plan, or the forthcoming Mayor's Air Quality Strategy.
- 5.1.4 In considering the issues, and making recommendations to the Mayor, TfL has been mindful of the remit of the Strategy and sought to focus on the issues relevant to the policies and proposals included in the Public Draft MTS. This is intended to provide the Mayor with the information he needs in order to understand the range of issues raised by respondents and make a decision on the final text of the Strategy for its formal approval and publication.
- 5.1.5 However, TfL will seek to use the full range of views expressed in other plans and in particular, in future engagement with the boroughs and other partners in the sub-regional planning process.

5.2 The Mayor's Transport Strategy

- 5.2.1 Having completed the public and stakeholder consultation on the policies and proposals set out in the Public Draft MTS, the Mayor is asked to approve the final text of the Transport Strategy for the purposes of its formal adoption and publication under sections 41 and 142 of the GLA Act. If he does so the 2001 strategy will be replaced and superseded by the revised text. TfL recommends to the Mayor that he formally approves the text set out in Appendix A of the Mayor's Decision Form as his statutory Transport Strategy.

Draft Mayor's Transport Strategy

**Statutory consultation with the public and
stakeholders**

TfL'S REPORT TO THE MAYOR ON CONSULTATION:

Appendices 1, 2 and 3

Annexes B and C

March 2010

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Appendix 1 - List of Stakeholders consulted

(441 in total)

Black, Asian and Minority Ethnic Representative Organisations (37)

1990 Trust
African Caribbean Business Network
Al-Hasaniya Moroccan Womens Centre
Al-Muntada Al-Islami Trust
Asian Business Association
Bait al-Mal al-Islami
Bangladesh Welfare Association
Beit Klal Yisrael
Bengali Workers Association
Black Londoners Forum
Black Neighbourhood Regeneration and Renewal Network (BNRRN)
Black Training and Enterprise Group (BTEG)
Centre for Armenian Information & Advice
Chinese in Britain Forum
Confederation of Indian Organisations
Consortium of Bengali Associates
Council of Ethnic Minority Voluntary Sector Organisations (CEMVO)
Eritrean Support Group
Institute of Race Relations
Iraqi Community Association
Irish Support & Advice Service
Islamic Universal Association
Jewish Care
Joint Council for the Welfare of Immigrants
London Chinese Community Network
Monitoring Group
Moroccan Community Welfare Group
National Assembly Against Racism
Naz Project
Operation Black Vote
Race Equality Foundation
Race on the Agenda
Refugee Council
Society of Afghan Residents
Somali Welfare Association
Zimbabwe Community Association
Zoroastrian Trust Funds of Europe

Business Improvement Districts (BIDs) (8)

Angel BID
Croydon BID
E11 BID
Ealing Broadway BID
Kingston First
London Bridge BID
London Riverside BID

Paddington BID

Business Representative Groups (19)

British Chamber of Commerce
British Retail Consortium
Camden Town Unlimited
Canary Wharf Group
Confederation of British Industry (CBI)
Covent Garden Market Authority
Federation of Small Businesses (FSB)
Forum of Private Business
Heart of London
In Holborn
Islington Chamber of Commerce
London Chamber of Commerce and Industry (LCCI)
London First
New West End Company
Oxford Street Association
Regent Street Association
Southwark Chamber of Commerce
Visit London
Wandsworth Chamber of Commerce

Children/Young People (13)

4Children
Action for Children
Barnardos
British Youth Council
Catch 22
Kids Co
London Youth
National Children's Homes (NCH)
National Council of Voluntary Youth Services
National Society for the Prevention of Cruelty to Children (NSPCC)
Prince's Trust
Save the Children
Tamezin Club

Cycling/Pedestrian Organisations (3)

Living Streets
London Cycling Campaign (LCC)
Cyclists' Touring Club (CTC)

Disability and Mobility Groups (30)

Asian People's Disability Alliance
Association of Disabled Professionals
Black Disabled Londoners Association
British Council of Disabled People
British Deaf Association
Community Transport Association UK (CTA)

Deafblind UK
Disability Alliance
Disability Resource Team
Disabled Drivers Motor Club
Disabled Persons Transport Advisory Committee
Employers' Forum on Disability
Guide Dogs for the Blind Association
Inclusion London
Independent Disability Advisory Group (IDAG)
Joint Committee on Mobility of Blind & Partially Sighted People (JCMBPS)
Joint Mobility Unit
London Community Interest Company of Deaf and Disabled People's Organisations
Mencap
Metropolitan Society for the Blind
Mobilise
National Autistic Society
Organisation of Blind Africans & Caribbeans (OBAC)
People First
Royal Association for Disability Rights (RADAR) - London Access Forum
Royal National Institute for Deaf People (RNID)
Royal National Institute of Blind People (RNIB)
SCOPE
SENSE
Spinal Injuries Association

Economic and Regeneration Partnerships (8)

Better Bankside
Central London Partnership
Hainault Business Partnership
London Thames Gateway Development Corporation
Restore Peckham
Thames Gateway London Partnership (TGLP)
Waterloo Quarter Business Alliance
West London Partnership

Education (5)

Heriot-Watt University
Imperial College
University College London (UCL)
University of East London (UEL)
University of Westminster

Emergency Services Providers (6)

Association of Chief Police Officers
British Transport Police
City of London Police
Maritime & Coastguards Agency
Metropolitan Police Service
Metropolitan Police Transport Service

European Government (2)

Gerard Batten MEP
Syed Kamall MEP

Faith Groups (14)

Archdiocese of Southwark
Archdiocese of Westminster
Bah'i Community of the UK
Board of Deputies of British Jews
Buddhist Society
Chinese Church in London
Church of England
Evangelical Alliance
Holy Mission
Interfaith Network
Jain
Muslim Council of Britain
National Council of Hindu Temples
Network of Sikh Organisations

Freight/Haulage Representative Organisations (4)

British International Freight Association
Freight Transport Association (FTA)
National Courier Association
Road Haulage Association (RHA)

GLA Functional Bodies & Commissions (8)

London Development Agency (LDA)
London Fire & Emergency Planning Authority
London Sustainable Development Commission (LSDC)
London TravelWatch
Mayor's London Equalities Commission
Metropolitan Police Authority
Olympic Delivery Authority (ODA)
Transport for London (TfL Board)

Government (6)

Cabinet Office Social Exclusion Task Force
Department for Environment, Food and Rural Affairs
Department for Transport (DfT)
Foreign and Commonwealth Office
Government Office for London
MoD Defence Movements and Transport Policy Division

Health Organisations (20)

Asthma UK
British Lung Foundation
British Red Cross

Care Quality Commission
Carers UK
Cystic Fibrosis Trust
Health Protection Agency
London Health Observatory
Muscular Disease Society
National Institute for Health and Clinical Excellence
National Patient Safety Agency
National Patient Transport Modernisation Group
National Performance Advisory Group for the NHS
National Treatment Agency
NHS Blood and Transplant
NHS London
NHS Professionals Special Health Authority
Regional Public Health Group London
St John Ambulance - London (Prince of Wales's Division)
Stroke Association

London Assembly (11)

25 London Assembly Members
Assembly Planning and Housing Committee Secretariat
Assembly Transport Committee Secretariat
Greater London Assembly Conservative Group
Greater London Assembly Green Group
Greater London Assembly Health
Greater London Assembly Labour Group
Greater London Assembly Liberal Democrats Group
Greater London Assembly One London Group
London Assembly
London Assembly Transport Committee

London Boroughs (34)

City of Westminster
Corporation of London
London Borough of Barking and Dagenham
London Borough of Barnet
London Borough of Bexley
London Borough of Brent
London Borough of Bromley
London Borough of Camden
London Borough of Croydon
London Borough of Ealing
London Borough of Enfield
London Borough of Greenwich
London Borough of Hackney
London Borough of Hammersmith & Fulham
London Borough of Haringey
London Borough of Harrow
London Borough of Havering
London Borough of Hillingdon

London Borough of Hounslow
London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Redbridge
London Borough of Richmond upon Thames
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
London Councils
Royal Borough of Kensington & Chelsea (RBKC)
Royal Borough of Kingston upon Thames

Motoring Organisations (11)

Association of British Drivers (ABD)
Association of Car Fleet Operators
Automobile Association (AA)
British Motorcyclists Federation
Chartered Institute of Logistics & Transport (CILT)
Federation of British Historic Vehicle Clubs
Green Flag Group
Institute of Advanced Motorists (IAM)
Motorcycle Action Group
Motorists' Forum
RAC Foundation

NHS Trusts/Health Authorities within Greater London (80)

Barking and Dagenham Primary Care Trust
Barnet & Chase Farm Hospitals NHS
Barnet Primary Care Trust
Barnet, Enfield & Haringey Mental Health NHS Trust
Barts and The London NHS Trust
Bexley Care Trust
Brent Teaching Primary Care Trust
Bromley Hospitals NHS Trust
Bromley Primary Care Trust
Camden & Islington Mental Health & Social Care Trust
Camden and Islington Mental Health and Social Care Trust
Camden Primary Care Trust
Central & NW London NHS Foundation Trust
Chelsea and Westminster Hospital NHS Foundation Trust
City & Hackney Teaching Primary Care Trust
Croydon Primary Care Trust
Dartford and Gravesend NHS Trust
Ealing Hospital NHS Trust
Ealing Primary Care Trust

East London NHS Foundation Trust
Enfield Primary Care Trust
Epsom & St Helier NHS Trust
Great Ormond Street Hospital
Greenwich Teaching Primary Care Trust
Guy's & St Thomas' Hospital NHS
Hammersmith & Fulham Primary Care Trust
Hammersmith Hospitals NHS Trust
Haringey Teaching Primary Care Trust
Harrow Primary Care Trust
Havering Primary Care Trust
Hillingdon Hospital NHS Trust
Hillingdon Primary Care Trust
Homerton University Hospital NHS
Hounslow Primary Care Trust
Islington Primary Care Trust
Kensington and Chelsea Primary Care Trust
King's College Hospital NHS Trust
Kingston Hospital NHS Trust
Kingston Primary Care Trust
Lambeth Primary Care Trust
Lewisham Hospital NHS Trust
Lewisham Primary Care Trust
London Ambulance Service NHS Trust
Mayday Healthcare NHS Trust
Moorfields Eye Hospital NHS Trust
Newham Primary Care Trust
Newham University Hospital NHS Trust
North East London Mental Health NHS
North Middlesex University Hospital NHS Trust
North West London Hospitals NHS
Oxleas NHS Trust
Princess Alexandra Hospital NHS Trust
Queen Elizabeth Hospital NHS Trust
Queen Mary's Sidcup NHS Trust
Redbridge Primary Care Trust
Richmond and Twickenham Primary Care Trust
Royal Brompton & Harefield Hospital
Royal Free Hampstead NHS Trust
Royal Marsden NHS Trust
Royal National Orthopaedic Hospital NHS Trust
South London & Maudsley NHS Foundation Trust
South West London & St Georges Mental Health NHS Trust
Southwark Primary Care Trust
St George's Healthcare NHS Trust
St Mary's NHS Trust
Surrey and Borders Partnership NHS Trust
Surrey and Sussex Health Care NHS Trust
Sutton & Merton Primary Care Trust
Tavistock & Portman NHS Foundation Trust

The Hillingdon Hospital NHS Trust
The Lewisham Hospital NHS Trust
Tower Hamlets Primary Care Trust
University College London Hospitals NHS Foundation Trust
Waltham Forest Primary Care Trust
Wandsworth Primary Care Trust
West London Mental Health NHS Trust
West Middlesex University Hospital
Westminster Primary Care Trust
Whipps Cross University Hospital NHS Trust
Whittington Hospital NHS Trust

Non Departmental Government Bodies/Executive Agencies/Public (17)

Commission for Equality and Human Rights
Commission for Racial Equality
Driver and Vehicle Licensing Agency
Driving Standards Agency
Environment Agency
Equalities and Human Rights Commission
Equality and Human Rights Commission (formerly Disability Rights Commission)
Highways Agency
Low Pay Commission
Office of Rail Regulation
Parking and Traffic Appeals Service
Parliamentary Advisory Council for Transport Safety
Royal Commission on Environmental Pollution
Sustainable Development Commission
The Royal Parks
Vehicle and Operator Service Agency (VOSA)
Vehicle Certification Agency

Older People (5)

Age Concern
Association of Greater London Older Women
Greater London Forum for the Elderly
Help the Aged
National Pensioners Convention

Other (11)

Argall Avenue
DHL International Ltd
Hammersmith London
Health Commission
J Doorman Associates Ltd (IIA)
Kimpton
Partnership Solutions
Routemaster Association
South London Sub Regional Strategy Board
Tellings Golden Miller Limited
United Parcel Service (UPS)

Professional Organisations (11)

Association for Consultancy and Engineering (ACE)
Association of Town Centre Managers
British Medical Association
Chartered Institution of Water and Environmental Management
Finance and Leasing Association
Institute of Directors
Institution of Highways and Transportation
Royal Academy of Engineering
Royal College of Nursing
Transport Planning Society (TPS)
Transport Research Laboratory

Regional Government (2)

East of England Development Agency (EEDA)
South East England Development Agency (SEEDA)

Trade Associations (9)

British Vehicle Rental and Leasing Association (BVRLA)
Guild of British Coach Operators
Licensed Taxi Drivers' Association
Natural Gas Vehicle Association Limited (NGVAL)
Society of Motor Manufacturers & Traders Ltd
Telecommunications Industry Association
The Despatch Association
The Society of London Manufacturers (SOLOMAN)
UKLPG (UK Liquefied Petroleum Gas)

Trade Unions (10)

Associated Society of Locomotive Engineers and Firemen (ASLEF)
Communication Workers Union
Fire Brigades Union Regional Office
National Farmers Union
National Union of Rail Maritime and Transport Workers
National Union Students
Public and Commercial Services Union
Trades Union Congress (TUC)
Union of Shop, Distributive and Allied Workers (USDAW)
Unite

Transport and Environment Representative Organisations (25)

Alliance Against Urban 4x4s
Campaign for Better Transport
Campaign for Clean Air in London
Capital Transport Campaign
Cenex
Cleaner Transport Forum
Confederation of Passenger Transport (CPT)
Energy Saving Trust (EST)

Environmental Protection UK (formerly NSCA)
Friends of the Earth
Greenpeace
Kensington & Chelsea Environment Round Table
London Civic Forum
London Sustainability Exchange (LsX)
London Sustainable Development Forum
Low Carbon Vehicle Partnership
National Federation of Bus Users
Natural England
North London Transport Forum
Passenger Focus
Ramblers
Road Peace
Sustrans
Transport for All (TfA)
Walk London

Transport Operators (6)

Abellio (formerly Travel London)
London Bus Operators' Forum
Port of London Authority
South & West London Transport Conference (SWELTRAC)
Stagecoach London
Universitybus Limited

Transport Partnerships (1)

South-East London Transport Strategy (SELTRANS)

Transport Research Groups (2)

Centre for Independent Transport Research
Institute for Transport Studies

Utilities (5)

British Gas Group
British Telecom (BT)
National Grid
Royal Mail
Thames Water

Voluntary/Community Groups (18)

Bassac
Central London CVS Network
Garratt Park
Greater London Volunteering
London Advice Services Alliance (LASA)
London Citizens
London Community Recycling Network (LCRN)
London Forum of Amenity & Civic Societies
London Tenants Federation

London Voluntary Service Council
National Trust
Off the Streets and into Work (OSW)
School for Social Entrepreneurs
Stonewall
Toynbee Hall
Volunteer Bureau
Volunteering England
Women's Resource Centre (WRC)

Appendix 2 - List of Stakeholders who responded to the consultation

(151 in total)

Business Representative Groups (4)

Confederation of British Industry (CBI)
Federation of Small Businesses (FSB)
London Chamber of Commerce and Industry (LCCI)
London First

Contiguous Local Authorities (3)

Hertfordshire County Council
Kent County Council
Tandridge District Council

Cycling/Pedestrian Org (4)

Cyclists' Touring Club (CTC)
Living Streets
London Cycling Campaign (LCC)
Walk England

Disability, Mobility and Older People (9)

Age Concern
Community Transport Association UK (CTA)
Guide Dogs for the Blind Association
Inclusion London
Independent Disability Advisory Group (IDAG)
London Disability Cycling Forum
London Visual Impairment Forum (LVIF)
Royal National Institute for Deaf People (RNID)
Royal National Institute of Blind People (RNIB)

Economic/regeneration partnerships (7)

Better Bankside
London Thames Gateway Development Corporation
North London Strategic Alliance
Park Royal Partnership (PRP)
South London Partnership (SLP)
Thames Gateway London Partnership (TGLP)
West London Partnership

Education (1)

University of East London (UEL)

Freight/Haulage Representative Organisations (3)

Central London Freight Quality Partnership
Freight Transport Association (FTA)
Road Haulage Association (RHA)

GLA Functional Bodies & Commissions (5)

London Development Agency (LDA)
London Sustainable Development Commission (LSDC)
London TravelWatch
Olympic Delivery Authority (ODA)
Transport for London (TfL Board)

Government (2)

Department for Transport (DfT)
Parliamentary Advisory Council for Transport Safety

Health (8)

Commissioning Support for London
Enfield NHS Trust
London Primary Care Trusts
NHS Lambeth
NHS London
NHS Tower Hamlets
North West London Hospitals NHS Trust
Royal Free Hampstead NHS Trust

London Assembly (6)

Jenny Jones AM
London Assembly
London Liberal Democrats (The London Assembly Liberal Democrat group and Liberal Democrat London spokesperson Tom Brake MP)
Richard Tracey - London Assembly Conservative Group
Steve O'Connell - Assembly Member
Val Shawcross - Assembly Member

London Boroughs (34)

Corporation of London
London Borough of Barking & Dagenham
London Borough of Barnet
London Borough of Bexley
London Borough of Brent
London Borough of Bromley
London Borough of Camden
London Borough of Croydon
London Borough of Ealing
London Borough of Enfield
London Borough of Greenwich
London Borough of Hackney
London Borough of Hammersmith and Fulham
London Borough of Haringey
London Borough of Harrow
London Borough of Havering
London Borough of Hillingdon
London Borough of Hounslow

London Borough of Islington
London Borough of Lambeth
London Borough of Lewisham
London Borough of Merton
London Borough of Newham
London Borough of Redbridge
London Borough of Richmond Upon Thames
London Borough of Southwark
London Borough of Sutton
London Borough of Tower Hamlets
London Borough of Waltham Forest
London Borough of Wandsworth
London Councils
Royal Borough of Kensington and Chelsea (RBKC)
Royal Borough of Kingston upon Thames
Westminster City Council

London Councillors (4)

Councillor Jonathan Glantz - Westminster City Council
Councillor Liz Santry - Haringey
Councillor Peter Morgan - Bromley
Councillor Rahman Khan - Haringey

Motoring Organisations (5)

Association of British Drivers (ABD)
Automobile Association (AA)
British Motorcyclists Federation
Institute of Advanced Motorists (IAM)
RAC Foundation

MPs (2)

Clive Efford MP
Greg Hands MP

Non Departmental Public Bodies (5)

British Waterways
English Heritage
Environment Agency
Highways Agency
Natural England

Other (2)

Royal Parks
The Crown Estate

Professional Organisations (6)

Association for Consultancy and Engineering (ACE)
Chartered Institute of Environmental Health (CIEH)
Chartered Institute of Logistics and Transport (CILT)
Chartered Institution of Highways and Transportation (CIHT)

Institute of Civil Engineers (ICE)
Transport Planning Society (TPS)

Regional Government (2)

East of England Development Agency (EEDA)
South East England Development Agency (SEEDA)

Trade Associations (6)

Association of International Courier and Express Services (AICES)
British Vehicle Rental and Leasing Association (BVRLA)
Licensed Private Hire Car Association (LPHCA)
Private Hire Board
Society of Motor Manufacturers and Traders Limited (SMMT)
UKLPG (UK Liquefied Petroleum Gas)

Transport and Environment Representative Organisations (16)

Aviation Environment Federation
Campaign for Better Transport
Campaign for Clean Air in London (CCAL)
Campaign to Protect Rural England (CPRE)
Confederation of Passenger Transport (CPT)
Energy Saving Trust (EST)
Friends of Capital Transport Campaign
Friends of the Earth
London Civic Forum
London Civic Forum and Youth Campaign for Better Transport
London Forum of Amenity and Civic Societies
Railfuture
Ramblers
Roadpeace
Sustrans
Transport for All (TfA)

Transport Operators (11)

Association of Train Operating Companies (ATOC)
First Capital Connect
Heathrow Airport Limited
Heathrow Hub Limited
London City Airport
London Gatwick Airport
National Express East Anglia and c2c
Network Rail
Port of London Authority
South & West London Transport Conference (SWELTRAC)
South East England Regional Transport Board

Unions (4)

Associated Society of Locomotive Engineers and Firemen (ASLEF)
Trades Union Congress (TUC)
Transport Salaried Staffs' Association (TSSA)
Unite

Utilities (2)

British Telecom (BT)
National Joint Utilities Group (NJUG)

Appendix 3 – List of meetings relevant to the development of the draft Mayor’s Transport Strategy

Date	Event
2009	
29 June	Pre-engagement roundtable - <i>attended by Living Streets, London Cycling Campaign and Natural England +8 other organisations</i>
2 July	Pre-engagement roundtable for community, voluntary and disability groups- <i>attended by Royal National Institute of Deaf People, Age Concern, Independent Disability Advisory Group +34 other organisations</i>
1 October	Confederation of British Industry / London First briefing
7 October	Central London Chief Executives / Greater London Authority Officers
13 th October	London First Mayor’s Transport Strategy event with Deputy Chair of TfL
13 October	City of London
14 October	London Borough of Islington
15 October	London Councils TEC – Local Implementation Plans and Cycling Revolution
16 October	Age Concern, Help the Aged and the Greater London Forum for Older People - ‘Break the Barriers’
19 October	Royal Borough of Kensington & Chelsea
20 October	London Borough of Tower Hamlets
20 October	Urban Transport World Europe - ‘Matching National and Local Government plans with the needs of the city’
21 October	London Borough of Bexley
21 October	The Chartered Institute of Logistics and Transport
22 October	London Thames Gateway Development Corporation
24 October	Youth Participation event - <i>attended by London Youth, London Civic Forum and British Youth Council + 4 other stakeholders</i>
26 October	Thames Gateway London Partnership

Date	Event
27 October	London First
28 October	North London Transport Forum – (Assistant Directors)
28 October	Croydon multi agency regeneration meeting - <i>attended by London Development Agency, National Rail and Homes and Communities Agency</i>
28 October	London Borough of Bexley
2 November	South & West London Transport Conference
2 November	London Development Agency - New Urban Agenda
4 November	Central London Forward
4 November	Integrated Transport Conference
5 November	Passenger Transport Group
5 November	Kent County Council
6 November	Royal Borough of Kingston upon Thames
6 November	London Borough of Camden (Leader and Chief Executive)
8 November	London Borough of Barnet
9 November	South London Strategy Board
10 November	Haringey Transport / Mobility Forum
10 November	London Travelwatch
10 November	Smarter Travel Sutton
10 November	Environmental Agency
11 November	Road Safety Expo
12 November	London Borough of Merton
12 November	London Borough of Barking & Dagenham
12 November	London Council TEC members and Borough Officers
17 November	Royal Borough of Kensington & Chelsea
17 November	Community Transport Association
17 November	London Borough of Wandsworth
17 November	'London Calling' - <i>attended by Friends of the Earth, London Forum of Amenity & Civic Societies, Living Streets +56 other stakeholders</i>

Date	Event
17 November	Public and Stakeholder event at New London Architecture
17 November	Greater London Authority Chief Executives (North Sub-region)
17 November	London Voluntary Services Council
18 November	Thames Gateway London Partnership
19 November	London Borough of Newham
20 November	London Borough of Bromley
23 November	Association of Train Operating Companies and Train Operating Companies
23 November	London Borough of Lewisham
26 November	Follow up on the MTS workshop with the West London Strategic Transport Group
26 November	London Borough of Lewisham (attended by Mayor)
27 November	Roundtable discussion for Disability and Equality Groups - <i>attended by Royal National Institute of Blind People, Guide Dogs for the Blind and Kingston Centre for Independent Living (KCIL)</i>
27 November	London Borough of Greenwich
27 November	London Borough of Richmond - (Director of Environment)
27 November	London Councils – (South London boroughs)
30 November	Corporation of London – (Chairman of Policy and Resources Committee)
30 November	Air Quality Summit: Department for environment food and rural affairs / Department for Transport
1 December	Passenger Transport Executive Group
1 December	Roundtable discussion with Health stakeholders - <i>attended by the Greater London Authority, NHS London and London Ambulance Service NHS Trust +16 other stakeholders</i>
1 December	London Councils
1 December	London Sustainable Development Commission
2 December	North Region Follow-on workshop from 12 Nov
2 December	West London Partnership

Date	Event
3 December	London Borough of Richmond upon Thames
3 December	Launch of the Disabilities Equality Scheme
3 December	London Environment Coordinators Forum
7 December	London Borough of Enfield
7 December	London Thames Gateway Development Corporation
7 December	London Councils - (Central London boroughs)
8 December	London Borough of Barnet
9 December	East Region Follow-on workshop from 12 Nov
9 December	Meeting with London Councils
10 December	Meeting with London Councils TEC
10 December	London Borough of Havering
11 December	Environmental Group Stakeholder Meeting - <i>attended by Campaign for Better Transport, Living Streets, Walk England +4 other stakeholders</i>
11 December	London Borough of Hillingdon
12 December	Transport for London / London Councils - Sub Regional Transport Planning Event
14 December	Third sector London Civic Forum Event - <i>attended by London Forum of Amenity & Civic Societies, Guide Dogs for the Blind Association and Inclusion London + 13 other stakeholders</i>
15 December	Network Rail
15 December	London Borough of Hackney
16 December	Federation of Small Businesses and London Chamber of Commerce
17 December	London Borough of Barking & Dagenham
17 December	Meeting with Tom Brake MP, Liberal Democrat, Spokesperson on Home Affairs, the Olympics and London

Date	Event
2010	
5 January	London Borough of Tower Hamlets
5 January	Meeting with Ibero-American Community Group
6 January	City Property Association / Westminster Property Association Seminar
7 January	London Borough of Southwark
7 January	Meeting with Conservative MPs
8 January	London Borough of Hammersmith & Fulham

Note: Transport for London has regular meetings with the London boroughs, and other stakeholders, and the above is not an exhaustive list of these. The table above includes meetings organised by stakeholders and representatives from the Mayor's office as well as Transport for London officers.

Annex B – Summary for each stakeholder response received

Age Concern

Age Concern London supports the goals of improving transport opportunities for all Londoners, improving physical accessibility and access to services. Age Concern London also welcomes the concept of a joined-up 'whole journey' approach. It urges the Mayors Transport Strategy (MTS) to include a timeline for increasing step-free access to the Underground but states the planned accessibility improvements to the Underground are welcome. It states that there needs to be continued attention to bus driving standards and driver behaviour, as well as making disability and age awareness part of the assessment of driver performance, and that bus timetables should allow drivers to take the time to ensure passenger safety. Age Concern London states that the acknowledgement of the role of community transport and the commitment to work with the boroughs and other stakeholders is welcome. It states that the MTS should support inclusive access to the Blue Badge scheme and calls for a public information campaign on the Freedom Pass. It states that many older people could benefit from travel-mentoring; and that there needs to be better coordination between door-to-door services provided by Transport for London (TfL) and Patient Transport Services commissioned by the NHS.

Associated Society of Locomotive Engineers and Firemen (ASLEF)

ASLEF states that the Oxford Street tram, Thames Gateway Bridge and cancelled transport schemes must be re-examined and funds should be used to improve reliability and capacity on the transport system as well as continue to be available for Crossrail and Underground upgrades. It states that Crossrail should not be jeopardised by short term savings, but welcomes support for the development of rail freight terminals and high speed rail. ASLEF states there is a need for capacity upgrades on the North London Line and that the commitment to the electrification of the Gospel Oak to Barking line is welcome but the line would also benefit from capacity increases. It states that escalating costs on Tube projects should not affect other projects within London and that the transport system requires long term investment in infrastructure and rolling stock.

Association for Consultancy and Engineering (ACE)

ACE welcomes the overall objectives of the MTS but is concerned about affordability and suggests there needs to be creative ways to find investment, and also that there should be more detailed timescales for the implementation of the schemes listed. It advocates a long-term approach to asset maintenance and suggests that schemes need to be considered as short, medium or long-term depending on a balance of their benefits and affordability. For example, it welcomes a national high speed rail network, and further extensions to Crossrail, Docklands Light Railway (DLR) and Tramlink, but these must be considered long-term aspirations. In the short term, it would like further Tube station enhancements, work on strategic interchanges, smoothing of road journey flows and the incorporation of features to improve the resilience to climate change effects.

Association of British Drivers (ABD)

ABD states that MTS needs to cater more for drivers by: reversing measures that reduce road speed and remove road space; providing innovative parking relief; trialling the removal of some traffic signals; and reviewing the usage of bus lanes, including the potential for allowing cars to use these lanes more often. It states that physical and engineering design on the road network needs to be done in a manner that is driver-friendly and that MTS should require transport authorities to remove road humps and other 'street furniture'. The ABD also states that the Congestion Charging Western

Extension Zone should be removed and expresses doubts over Cycle Superhighways due to the reallocation of road space.

Association of International Courier and Express Services (AICES)

AICES states that there should be further recognition of the needs of express services including international aviation, while welcoming proposals for smoothing traffic flows, a roadworks permit scheme and easing congestion. It states that access to loading and unloading bays needs to be improved and supports the decision to remove the Western Extension Zone. AICES states that any further road user charging should differentiate between commercial and domestic vehicles and that the use of rail, waterways and outer-city consolidation centres would not be appropriate for express services. It welcomes the promotion of delivery and service plans, construction logistics plans and the Freight Operator Recognition Scheme as well as the need for noise abatement measures and greater flexibility in out of hours delivery times.

Association of Train Operating Companies (ATOC)

The Association of Train Operating Companies states that there is a need for cooperation between TfL and the Train Operating Companies in order to facilitate improvements and effective long-term planning for the rail system in London. It welcomes the work done so far and states that TfL can most effectively ensure alignment between the MTS and TOCs' objectives by influencing the Department for Transport's franchise specification process, without micro-management of the TOCs. It supports the Mayor's approach of using both infrastructure development, improved integration and demand management in order to meet growing demand and would be pleased to work with TfL on strategic interchanges. It would like more investment in orbital rail; supports providing information for pedestrians and cyclists at termini; and supports changes to franchises so that TOCs could take greater responsibility for station improvements.

Automobile Association (AA)

The AA notes that the majority of London's goods or people use the road network for a part of their journeys and states that there should be a greater appreciation of the road system as a transport asset especially for those who are less mobile. It states that there should be better management of road and building works that affect the operation of the road network; improvements to traffic light phasing; reallocation of removed road space back to traffic; and improvements to incident management with clearance targets and the creation of fast response units to deal with incidents that create congestion as well as a review of special events and the disruption that they cause. It states there should be an assessment of the performance of key road junctions and the causes of congestion hotspots with a view to developing solutions. It calls for an assessment of bus lanes, including their operating hours, and the potential removal of these where they are ineffective; better coordination between TfL and the boroughs on their respective road networks; improved road maintenance, particularly around traffic signal fault repair and road surface skid; and supports the removal of the Western Extension Zone. It would welcome more car drop off points at interchanges and considers that while the need for tidy streets is appreciated, temporary signs can alleviate the need for permanent signs and play an important traffic and safety role. It does not support the principle of London-wide road user charging.

Aviation Environment Federation

The Aviation Environment Federation focuses its response on those aspects of the strategy that relate to aviation. It agrees that Heathrow expansion should be resisted and suggests that there should be an evidence base for the assertion that not providing additional runway capacity in the South East of England would undermine London's competitive position. With regard to surface access to airports, it supports schemes to increase the proportion of public transport trips but suggests that there should

be a coordinated approach whereby road and parking capacity is constrained. It strongly supports research into the relative environmental impacts of alternative transport modes, such as high-speed rail.

Better Bankside

Better Bankside states that the proposed targets and framework of indicators do not capture all of the aspiration of the strategy, particularly in relation to 'better streets' and smarter travel. It welcomes the establishment of the River Service Concordat; states that services for commuters should be improved at Bankside Pier and endorses further extension of Oyster pay as you go to other river operators besides Thames Clipper. It welcomes proposals that will result in improvements to London Bridge station and proposals to regularly review the development of the bus network and introduce a permit scheme for road and street works. It suggests that proposals to encourage cycling and walking should be clearly linked to 'better streets' proposals and states that the targets to increase the mode share for cycling and walking are not ambitious enough. It welcomes proposals regarding Cycle Superhighways, Cycle Hire, cycle safety measures and cycle parking but also raises concerns about each initiative.

British Motorcyclists Federation

The British Motorcyclists Federation states that it would like to see more references to motorcycling within the MTS, and calls for improved provision of parking facilities for motorcycles. It states there should be greater access to existing facilities, more consideration of motorcycles when designing road infrastructure, access for motorcyclists to bus lanes and access for motorcyclists to advance stop lines across London.

British Telecom (BT)

BT states that Information and Communications Technology (ICT) can help to reduce carbon emissions from transport in a number of ways. These include providing people with real-time information about transport such as likely journey times and the carbon impacts of different modes; and encouraging businesses to switch from using vans to walking and cycling, as do BT's 'walking engineers'. It also advocates the adoption of home and flexible working to reduce overall travel, and the establishment of remote working centres in outer London, to boost business and reduce the congestion and emissions impacts of commuting.

British Vehicle Rental and Leasing Association (BVRLA)

The BVRLA states its support for offering incentives for the uptake of short term rental vehicles and electric vehicles such as exemption from the Congestion Charge and free parking for electric vehicles. It also states that there should be an expansion of car clubs and be better information provision about travel options. The BVRLA also states that local authority low emission zone schemes as well as the approach to electric vehicles should be consistent across all boroughs; and that local authorities should not negatively affect businesses with the introduction of local road pricing schemes or unnecessarily penalise commercial vehicles. The BVRLA expresses support for the removal of the Western Extension Zone and states that any changes to the LEZ standards should be signalled well in advance of implementation.

British Waterways

British Waterways states that the MTS should take into account the most relevant and up-to-date national policy frameworks for waterways and supports the inclusion of the Blue Ribbon Network and opportunities for passenger and freight transport on waterways. It states that more information should be provided on cycling and walking on the Blue Ribbon Network.

Campaign for Better Transport

Campaign for Better Transport welcomes the coordinated publication of the strategies. It supports plans to increase walking and cycling, improve access to town centres and strike a new balance between the different users of streets. It considers the MTS is seriously flawed as it claims to promote sustainable transport and work towards environmental improvements but is unwilling to tackle the volume or speed of traffic. It calls for clarification on smoothing traffic flow but supports the principle provided that provision for cyclists, pedestrians and people with disabilities is genuinely protected and improved. It supports keeping the Western Extension Zone, further road user charging and the use of parking charges to manage demand. It states that expenditure on physical accessibility should be maintained and commends the recent transformation of the bus network but states that there is no recognition of the role that buses play in outer London. It states that proposals for buses should be more detailed and include measures for bus priority and interchange. It states that the MTS lacks proposals for planning the expansion of the public transport network after the completion of the current TfL investment programme. It states that improving connectivity and facilities should not be limited to metropolitan town centres but all town and local centres. It welcomes Crossrail, Tube modernisation, the modernisation and expansion of London Overground and the expansion of the DLR and states that improving provision and service on rail services and stations should also include safety and security, access to pedestrians and cyclists and cycle parking at stations and on trains. It supports the development of orbital rail services and improved interchange between orbital and radial services and considers that interchange between the rail network and other modes, including cycling, needs urgent improvement. It calls for a change to the law to presume driver responsibility in collisions involving pedestrians or cyclists and supports 20mph speed limits and the use of average speed cameras. It states that cycle and walking mode share targets should be more ambitious and that the potential for cycling and walking in outer London has been neglected. It supports shared space provided the needs of different users are addressed and states that proposals to improve London's environment should include expressions of support for car-free initiatives.

Campaign for Clean Air in London (CCAL)

CCAL states that the Mayor's strategies fail to grasp the magnitude or urgency of the public health crisis caused by poor air quality in London and that the Transport and Air Quality strategies fail to include an adequate environmental assessment of the likely impact of key measures such as the removal of the Western Extension Zone or the delay of the implementation of Phase 3 of the Low Emission Zone, both of which it opposes. It states that both WEZ and LEZ Phase 3 are good measures in their own right and that WEZ could be improved by the adoption of dynamic road pricing and LEZ improved by the introduction of one or more additional inner LEZs combined with the earlier tightening of the standards for the current London-wide LEZ. It considers that the package of mitigation measures to ameliorate the air quality impacts of the removal of WEZ and delay of LEZ Phase 3 are largely unspecified and likely to be small in effect and that daily limit values for PM₁₀ would be breached in West London if the WEZ is removed.

Campaign to Protect Rural England (CPRE)

CPRE London welcomes a number of the high-level ideas, such as better quality public space and making the Thames effectively a new Tube line, as well as initiatives including public transport upgrades, and the rolling out of car clubs and cycle hire. However, it is concerned that many of these policy areas are not backed up with detailed analysis and, while the MTS proposes halving the rate of modal shift from car use achieved over the last decade, it reverses policies fundamental to London's success, such as relaxing strict controls on road building and the rolling back of congestion charging. It states that, as it stands the MTS would hinder rather than deliver the most important aspects of the Mayor's vision for London, its economic development and improvements in quality of life. It is concerned that the MTS underestimates the costs of physical inactivity, air pollution and carbon

emissions that are individually as great as those of congestion and considers that despite plans for a cycling revolution London's cycle hire share will continue to compare badly with other European cities.

Central London Freight Quality Partnership

Central London Freight Quality Partnership supports, the promotion of strategic rail / water freight interchanges; the acknowledgement of the importance of multi modal freight and the further implementation of Delivery and Servicing Plans. It states that there needs to be a more proactive approach to safeguarding sites for break bulk and consolidation as freight consolidation can improve freight transport and reduce freight emissions. It states that measures are needed to encourage the uptake of electric and low emission vehicles and that the importance of kerbside deliveries needs to be considered in the design and planning of the road network. It states that 'out of hours deliveries' can improve freight delivery in the right circumstances.

Chartered Institute of Environmental Health (CIEH)

The CIEH welcomes the MTS and focuses its response on areas which have an impact on climate change and air quality. It states that there should be better links between the MTS and the Mayor's Air Quality Strategy and would also like to see improved links between the sections on CO₂ and air quality in order to ensure that all efforts to reduce the former do not have a negative impact on the latter. It supports all efforts by the Mayor to reduce CO₂ emissions and to adapt to climate change but would like to see the contribution transport makes to air quality in addition to climate change recognised throughout. It supports proposals to reduce the noise impacts of transport in London. The CIEH welcomes further work to investigate options for road based river crossings in east London but stresses that these should include opportunities for improved walking and cycling crossings. It supports all schemes to encourage cycling but notes that road safety needs to be improved. Additionally the CIEH welcomes the smarter travel initiatives and efforts to reduce freight transport within the capital. It considers it essential that any proposals to charge for road use does not disproportionately affect those who can least afford it.

Chartered Institute of Logistics and Transport (CILT)

CILT states that land use changes must be considered in a balanced way and that within the MTS and that there is not enough of a focus on air transport. It also states that demand management should be considered as part of the main response to increasing congestion, with road and parking pricing reflecting the differential costs between peak and off peak. It also states its support for safeguarding sites for logistics and freight interchanges as well as increasing the use of London's wharves and waterways for freight. It states that the MTS should have an electric car scheme to zero carbon generation and it would like outer London orbital travel patterns which are currently inadequately catered for to be identified in a proposal and for proposals for public transport or road improvement to be brought forward. It considers the MTS should recognise the role of smaller airports within the Greater London Authority (GLA) boundary and the impact of High Speed 2 on demand for air travel. It states the MTS should concentrate on providing a high quality interchange between National Rail and interconnecting services at the termini in lieu of new orbital rail routes.

Chartered Institution of Highways and Transportation (CIHT)

CIHT support the overall direction of the MTS but raises concerns over the Mayor's rejection of the Thames Gateway Bridge scheme and the demotion of the fixed link at Gallions Reach. It supports proposals to ensure transport provision is accessible to people with mobility impairments and states that all bus stops should meet TfL's standard bus stop kerb height requirement, that the MTS should include Shopmobility schemes in its 'better streets' proposals and that step-free access should be prioritised in London's premier shopping streets. While it supports the strategy to develop locally

agreed improvements that enhance the viability of outer London, it does not support the greater emphasis on a few outer London developments and suggests that this could be detrimental to other town centres in Inner London. It states that there is a need for improved orbital public transport links in outer London. It supports proposals for road user charging but has concerns about proposals to remove the Western Extension zone if no measures are put into place to mitigate any resultant negative impacts in air quality and traffic congestion. It supports the provision of an additional runway at Heathrow and would welcome further assessment of the impacts of congestion at airports. It advocates improvements of surface access to airports but notes that no such proposals are outlined for Gatwick airport. It stresses the need for clarification on what steps the Mayor is willing to undertake to reduce the adverse impacts of climate change. It recommends that Phase 3 of the Low Emission Zone begins in 2010 with completion by 2011 and it calls for an implementation strategy to be identified and determined in 2010.

Clive Efford MP

Clive Efford MP has concerns about congestion in southeast London and Kent and particularly in relation to the approaches to the Blackwall Tunnel. He considers that a third tunnel from North Greenwich peninsula to Silvertown should have been the priority, instead of the Thames Gateway Crossing, because it generates the least amount of opposition locally and would create the least amount of disruption in terms of generating new traffic problems across the existing network. He considers that North Greenwich has developed into a major interchange and that additional transport links will be required in southeast London to support growth in the Docklands and Thames Gateway. He proposes that any crossing between Greenwich peninsula and Silvertown should have the capacity to include the DLR and that a feasibility study should be undertaken to extend the DLR into southeast London to Eltham.

Commissioning Support for London

NHS Commissioning Support for London acknowledges that the MTS can contribute to improving health by encouraging cycling and walking but would like more emphasis on the importance of physical activity for mental wellbeing. It suggests that TfL work with the NHS to promote healthy travel, further develop walking and cycling routes to and from health facilities and meet the high demand for public transport for accessing health facilities. It notes that consideration should be given to patients who are not able to travel by walking; cycling or public transport and that provision for parking should be made for such patients at health venues. It welcomes the Mayor's commitment to the provision of community transport.

Community Transport Association UK (CTA)

The CTA welcomes the vision of better transport integration but would like to see a stronger commitment to community transport in the Capital with clear guidance for boroughs and associated funding. It welcomes London-wide connectivity improvements but wishes to engage with the boroughs and TfL to ensure that the most vulnerable Londoners have access to the most appropriate forms of transport to meet their needs and it is keen to ensure that local transport issues are addressed through clear guidance to the boroughs. It is also keen to see stronger leadership in ensuring that public transport accessibility levels (PTALs) are adhered to and that issues relating to street furniture, traffic calming measures and accessibility guidelines for public transport should all be consistent. It would like to see further developments in travel training and assisted travel options for those who are currently unable to use public transport; welcomes the concept of integrated transport and would like the boroughs and TfL to ensure that a consistent approach to community transport is adopted across London. It is pleased that training has been highlighted within the MTS and would be keen to see this strengthened using the skills and experiences of CTA members to deliver high quality services to older and disabled Londoners. Finally, it would like to see stronger support for the role community

transport could play across London if further developed, particularly if further emphasis was placed on community transport in the LIP process.

Confederation of British Industry (CBI)

CBI supports the six goals of the MTS and states that its priorities for transport include the delivery of Crossrail and Tube upgrades to 2018; additional capacity on Tube and rail; improving the road network; and increased aviation capacity. It also supports enhanced interchange, more modal integration and smarter use of travel information systems. With regard to future capacity enhancement, it lists the Northern line upgrade, further extensions to Crossrail and Crossrail 2, improving strategic interchanges and a Bakerloo line extension as priorities. It would like schemes to be prioritised, and welcomes possible further Tramlink enhancements and supports river crossings in the east. It would like more focus on parking and loading issues and a thorough review of the bus network.

Corporation of London

The Corporation of London states support for the development of a national high speed rail network but also believes route alignment and connections to Heathrow are important factors which should be considered in the MTS. It states support for Crossrail, the Chelsea-Hackney line (although not a high priority) and the development of river services. It states that the Cross River Tram should be reinstated and that the MTS should emphasise a focus on affordable. It states that it is important that planned improvements to the rail network and services in London are delivered within the High Level Output Strategy (HLOS) 1 period to 2014 and states that it will support lobbying for adequate funding for capacity enhancements including Liverpool Street station. It states that it is supportive of the concept of a westward DLR expansion towards Charing Cross and Victoria as well as the Northern line upgrade 2 but states it is not convinced that the proposed possible extension to Battersea will be beneficial to the existing Northern line and its passengers. The Corporation of London would like a 'grassroots' review of bus routes and services and states that allowing taxis to use bus lanes in the City of London would be detrimental to bus services. It states that the MTS should clarify a plan for reducing taxi emissions and supports taxi marshalling in the City of London. It cautiously welcomes smoothing traffic flow in principle because of air quality benefits but any potential increased delays for pedestrians must be mitigated. It states that 'lane rental' as a concept should be further investigated; that the MTS should ensure that all new residential developments provide adequate cycle storage; and supports the proposed licensing of pedicabs, improved information to aid the take up of walking and the provision of increased provision of cycle training and cyclist awareness campaigns. It supports the proposals for mitigating transport related noise, in particular quieter buses and replacing road surfaces with low noise surfacing and encouraging companies to operate quieter vehicles. The Corporation of London supports emissions reductions from the public transport fleet but states that no specific targets or measures have been set; it would be pleased to work with the Mayor to introduce targeted local measures at air quality hotspots. It is concerned that encouraging the take up of electric vehicles may encourage a shift of people from public transport into electric vehicles and about the effect on Air Quality of deferment of Phase 3 of the Low Emission Zone to 2012. It welcomes further controls on taxi emissions and supports improvements to public information on journey planning.

Councillor Jonathan Glantz - Westminster City Council

Councillor Jonathan Glantz proposes that the Oyster card is adapted to allow cardholders to change buses as many times as necessary within a given time period to complete their journey as this would address some of the issues of bus flow and bus numbers, principally on Oxford Street.

Councillor Liz Santry – Haringey

Councillor Liz Santry is concerned about the above inflation increase in TfL fares and also questions why the Western Extension Zone and a levy on 'gas guzzling' vehicles are being removed if there is a deficit in TfL's finances.

Councillor Peter Morgan – Bromley

Councillor Peter Morgan states that there should be a connection between the DLR and Bromley North (via Lewisham), noting that the line already exists and requires joining up.

Councillor Rahman Khan – Haringey

Councillor Rahman Khan is concerned about the above inflation increase in TfL fares and also questions why the Western Extension Zone and a levy on 'gas guzzling' vehicles are being removed if there is a deficit in TfL's finances.

Cyclists Touring Club (CTC)

CTC states that there are serious omissions in the MTS around specific means to deter motor transport and is concerned that the commitment to get rid of physical barriers to cycling does not include the TfL road network. It states the MTS gives little attention to 20mph zones and that these zones need to be pursued more thoroughly. It states that improvements to public transport should be concentrated at interchange points, and cycle parking should be improved at interchange points; that rather than removing WEZ the Mayor should seek to extend the charging area; and is concerned over proposals which suggest new crossing for motor traffic at Silvertown and Gallions Reach and suggests that only river crossings dedicated to non-motorised traffic should be permitted. It supports measures to reduce freight journeys by using consolidation centres, using alternative vehicles and working with the boroughs to alter the restriction on freight delivery times. It states that there needs to be better planning to ensure people can live close to the services they need and believes that if measures to deter car use and reduce freight were stronger it would strengthen interventions to promote cycling. CTC states that it is important to improve the perceptions of personal safety and this should be enlarged to encompass the risk to cyclists and pedestrians from illegal driver behaviour.

Department for Transport (DfT)

DfT welcomes the fact that the MTS clearly aligns with its own strategic goals and it shares the Mayors enthusiasm for Crossrail and acknowledges the commitment to further improve the Tube and rail services. It states that it recognises the importance of reducing congestion by coordinating roadworks and is pleased to see commitment to lowering CO₂ emissions with electric vehicles and encouraging modal shift. It states that the MTS should be consistent with national policy over Heathrow and would like more clarity on unfunded schemes such as a southbound Bakerloo line extension, a Northern line extension to Battersea and new river crossings at Silvertown and Gallions Reach.

East of England Development Agency (EEDA)

EEDA supports the goals of the MTS and considers it aligns well to DaSTS national goals set by DfT, although a more explicit link between national and London policy would help together with an explicit reference to improvement in productivity growth within the goals. It supports proposals for enhanced radial rail capacity, for increased rail terminal capacity and for improved onward connectivity including Tube, bus and cycling / walking. It recognises Heathrow Airport as a nationally important airport hub and supports the expansion proposals advocated through the Air Transport White Paper subject to maximising environmental mitigation measures. It supports the collaborative approach with regional,

sub-regional and local authorities and agencies in the East and South East of England to secure the sustainable development and management of growth in the wider metropolitan area and the greater South East of England and coordinate approaches to other strategic issues of common concern. Finally, it seeks greater reference in all three strategies to the Greater South East prospectus which is being developed to reduce barriers to growth and improve opportunities for international competitiveness.

Energy Saving Trust (EST)

EST focuses its response on the impact of the strategy on CO₂ emissions. Overall it welcomes the strategic vision set out in the document and commends that climate change issues are a key tenet in it. It strongly supports policies that encourage reduced car use and modal shift towards walking, cycling and public transport. It states that unprecedented levels of investment in cycling are required and welcomes the Cycle Hire and Cycle Superhighway initiatives though stresses the importance of safety in order to encourage uptake. It states that the cycling mode share targets are not ambitious enough; notes that awareness raising and consumer engagement to encourage modal shift are essential; and is keen to work with the Mayor to help promote smarter travel and 'eco-driving'. It welcomes the targets to reduce London's CO₂ emissions and is pleased to see a balance of climate change mitigation and adaptation proposals within the strategy but stresses the focus should be on mitigation methods in the short to medium term. It supports air quality policies for transport that also have significant CO₂ reduction benefits and it welcomes proposals to support the uptake of lower carbon vehicles to reduce CO₂ emissions of both private and public sector vehicles. It suggests including a proposal which encourages public sector fleets to take up its Fleet Advice Services and it supports further development of car clubs and car sharing initiatives and the uptake of electric vehicles. It opposes removal of the Western Extension Zone and states that further developments on schemes such as congestion charging will be needed in the future. It supports policies to manage demand and is pleased that the Mayor will keep the option of road user charging open. It states that pricing should reflect the cost to society and the climate and that low polluting modes that reduce congestion should be the most affordable.

Enfield NHS Trust

Enfield NHS Trust states that while there are several interventions in the MTS that could increase cycling, there should be more ambitious targets for walking and cycling and further measures to increase levels of cycling. It also states walking and cycling could bring significant health benefits to people as well as helping to reduce CO₂ emissions.

English Heritage

English Heritage is pleased to see the intention to protect and enhance the historic environment but states that this could be strengthened. It calls for a coordinated approach to managing streets and spaces including the need for good design that respects London's character for example, balancing measures to combat crime and climate change with their impact on the character of the local environment. It states the removal of traffic signs will help enhance the urban realm and states that further careful consideration needs to be given to the heritage value of stations as part of the development of proposals to increase capacity. It states that road schemes and Thames crossings need to be considered in terms of impacts before they go ahead; that clarity is required on how future expected increases in air travel serving London will be accommodated; and states its support for the general improvement in the provision for cycling but would like to see the infrastructure designed so that it contributes to the local context and character. English Heritage states that there is a need to consider how pedestrians interact with other modes of transport in the same space and hence manage and change the 'fabric' of the street accordingly and states that there is an opportunity to increase access to the historic environment through the use of modern technology and information

points. It states that it is important to ensure that key stakeholders including English Heritage are engaged in the development and implementation of tree planting schemes, Sub-regional Transport Plans and the development of borough Local Implementation Plans.

Environment Agency

The Environment Agency supports the six goals of the MTS, and in particular supports the integration of transport and land-use planning, the promotion of modal shift to public transport, walking and cycling and the recognition of transport's role in the quality of the environment and in addressing inequalities, especially health inequalities. It states its reservations with regard to the reliance on encouragement rather than specific target-setting or compulsion for measures in the MTS (for example, at borough level for walking and cycling), and is also uncertain if lack of funding means that some projects will not be delivered. It is concerned about the impact of airport expansion on air quality and climate change and while it welcomes the measures to improve air quality here and in the Mayor's Air Quality Strategy, it states that forecast emissions of NO₂ are not supported by recent monitored trends. It supports the London Low Emission Zone, but is doubtful about local emission zones and instead advocates a 'central zone' LEZ with tougher emission controls. The Environment Agency states that there may need to be additional demand management measures may be needed to reduce transport's contribution to air pollution and climate change. It supports the aim to make the 2012 Games as environmentally friendly as possible.

Federation of Small Businesses (FSB)

The FSB strongly believes that the best outcome for London businesses will be achieved through an integrated and practical approach to the realities of London's transport, spatial, and economic needs. It is disappointed the three strategies are more disconnected than suggested in the Statement of Intent and that the MTS appears contains many unfunded schemes without obvious links between transport needs / future provision and economic growth. It is concerned that scant regard is given to how businesses might transport the goods and equipment needed for services. It welcomes the efforts made to extend orbital links but remains concerned about radial links. It is extremely disappointed no timeline has been given on the removal of the Western Extension and is concerned the MTS opens the way for further road user charging with very little detail about what this might involve. It is disappointed that while the third runway at Heathrow is unsupported, there is no plan for an alternative but plans to increase transport links to Heathrow. It is disappointed that the plans for freight are not relevant to small scale freight or transport of goods and it remains concerned that businesses will be penalised with unfair costs in relation to complying with LEZ Phase 3 and may still be non-compliant with future emissions standards despite remedial measures already taken. It welcomes the introduction of the lane rental scheme but would like to see better communication with small business to make them aware of works ongoing and, while it is happy with the introduction of SCOOT, it is disappointed about the lack of any details of further roll outs. Finally, it welcomes any efforts to improve public transport but would like to see better integration with cars to encourage multi-modal journeys.

First Capital Connect

First Capital Connect states its support for the High Level Output Specifications (HLOS) schemes including, HLOS 2, Thameslink and relieving London of freight by developing a new rail route but has concern about its location and impacts. It states that there should be careful consideration when implementing an integrated fare system and also encourages rail routes to go to Gatwick and London Luton. It states that it believes it will be difficult to replace all stock with stock compliant with the Rail Vehicle Accessibility Regulations.

Freight Transport Association (FTA)

The FTA is concerned about the dissolution of the Freight Unit and states that it could potentially result in a loss of focus on freight issues at a time of major developments such as Crossrail. It is concerned over the emphasis the MTS places on the Freight Operator Recognition Scheme and states that there is not adequate importance given to air freight. It states that the Delivery and Serving Plans methodology has the potential to underpin the Cycle Superhighways project and in a more general application would provide benefits in terms of general traffic flow.

Friends of Capital Transport Campaign

Friends of Capital Transport Campaign states that there is a lack of practical measures in the MTS to tackle congestion and emissions and suggests that where there are significant conflicts between goals or different users it should be openly acknowledged in the MTS. It welcomes the acknowledgement of the conflicting demands for road space in central London and the disruption that will be caused during the investment programme but questions what the solutions are to this. It states that the MTS should specifically mention linking bus routes as a way to improve orbital public transport connectivity; welcomes proposals regarding seven day travel; is concerned about the lack of funding for the South London line; suggests that consideration should be given to stations and interchange with passing lanes rather than looking at additional rail lines; does not believe that a review of Chelsea-Hackney line is a good use of funding; warmly welcomes the strong support for railway electrification, in particular the Barking / Gospel Oak line; and welcomes the proposal for strategic interchanges, but only if not implemented at the cost of severing direct radial routes. It considers that there is a conflict between a mass transit system and full accessibility and is concerned that the plans for step-free access schemes have been halted. It states that managing demand for travel is fundamental to delivering decent transport infrastructure and states that seeking to reduce emissions of air pollutants from transport should be secondary to achieving modal shift away from private vehicles and to public transport. It states that the fare increase falls most heavily on outer London, which is most vulnerable to adverse mode-shift and questions why there is a lesser shift to sustainable modes put forward in the strategy than had been planned when Transport 2025 was published. It states that road user charging is essential if the CO₂ emissions target is to be met. Before reaching a decision on the future of the Western Extension Zone it would like to see the data on any adverse impacts on the original zone and contends that the loss of funding as a result of WEZ removal would have a significant negative impact on the Mayor's ability to meet his policies and proposals.

Friends of the Earth

Friends of the Earth has a number of concerns regarding the London Plan, MTS and EDS including the need for outer London to contribute to the sustainable development of London, encouraging more people to live and work there, maximising access by walking and cycling and addressing car dependence, not exacerbating it by relaxing car parking standards or new vehicle river crossings. It is concerned that transport will only achieve a 10 per cent cut rather than the 60 per cent needed if it is to play its full role in meeting CO₂ targets and expresses concern that WEZ is being removed and that LEZ phase 3 is being deferred. It considers that the Mayor should reconsider introducing the CO₂ related Congestion Charge and expresses concern that while road user charging has the greatest potential to fill the CO₂ policy gap, along with road vehicle efficiency, its possible application is not set out in specific proposals. It is concerned that there will be an increase in congestion, despite Crossrail, Tube improvements and increased cycling. It considers that road building criteria must not be relaxed and no new large roads or vehicle crossings allowed, which would add to traffic and associated problems, and that public transport improvements should be pursued to provide any additional capacity required. It opposes growth in airports, including City Airport. It also considers that the Western Extension Zone provides an important revenue resource which would be lost at a time

when the Mayor has put up fares on public transport, a move that could force some to drive rather than use public transport. It welcomes the inclusion in the London Plan of reducing the need to travel, especially by car and the need to make it easier for people to access jobs, shopping, leisure facilities and services by public transport.

Greg Hands MP

Greg Hands MP states that there is a clear need to remove the Western Extension Zone; that the driving force behind Congestion Charging should be the reduction of congestion and not emissions; that TfL should continue to examine more innovative systems of payment and collection of the Congestion Charge; and that emissions related congestion charging is ineffective and needs modification.

Guide Dogs for the Blind Association

The Guide Dogs for the Blind Association states its concern over shared spaces for partially-sighted or blind people and the use of shared spaces by electric / hybrid vehicles that do not produce much sound to warn of their approach. It states concern over curtailment of step-free access on the Tube and states the need for accessibility improvements at Overground stations such as tactile platform edges.

Heathrow Airport Limited

Heathrow Airport Limited states that there is a strong economic case to expand Heathrow and details how a third runway could be added by 2020 and enable EU air quality limits for PM₁₀ and NO₂ to be met without the need for further mitigation measures yet there is no proposed solution for further growth at Heathrow. It states support for high-speed rail as complementary to additional airport capacity rather than as a substitute as it would only free up 2 per cent of Heathrow's capacity. It supports Airtrack and states that Heathrow should be served by a high speed rail station at the airport rather than a spur off the main route. It states that it would be premature to publish the final MTS without having considered the Government's forthcoming proposals over High Speed 2 and it states the overarching connectivity policy ignores airports completely. Heathrow Airport Limited states that there is no recognition that the M4, M25 and A4 are also major contributors to noise and air quality impacts in the Heathrow area and that it is inappropriate for a London-only review of national aviation policy.

Heathrow Hub Limited

Heathrow Hub Limited wants to ensure proper consideration is given to Heathrow interchange between High Speed Rail, existing rail services, proposed rail services including Crossrail and Airtrack, the road network and the airport itself. It states that consideration should also be given to the location of strategic freight interchange related to the Great Western Mainline, High Speed 2, Heathrow and the road network. It states that the MTS should reference work undertaken by Arup and HHL on the advantages to be obtained by seamless interchange between rail and air and the potential for rail / air substitution.

Hertfordshire County Council

Hertfordshire County Council supports the MTS in general, and welcomes any improvement to London's transport network as it is used by a large proportion of Hertfordshire's residents on a regular basis. It supports the proposals relating to rail and welcomes the inclusion of Finsbury Park in the priority list for improved capacity but would also like capacity improvements at Tottenham Hale, Farringdon, Euston and Moorgate stations. It supports extra capacity to assist orbital movement on the Overground network and wishes to ensure that this includes the route to Watford Junction and

that service upgrades to local services should be considered in conjunction with any future upgrade of strategic rail services on the West London line. It has concerns about Watford Junction Overground services being diverted to Stratford and considers that it is important that four-tracking on the West Anglia line provides for improved services at Hertfordshire stations. It supports the proposals to improve the Underground network, welcomes the inclusion of the interchanges at Finsbury Park, Highbury and Islington, Old Street and Moorgate in any future improvements and welcomes the continued support for the Croxley Rail Link scheme. It has concerns over the financial stability of cross-boundary bus services and would welcome opportunities to work with TfL to improve cross-boundary services and community transport and to continue to share journey planning and real-time information. It welcomes proposals to improve the management of traffic flows in London provided that traffic is not diverted out of London on to the already congested roads in southern Hertfordshire, including the M25. It would welcome discussion with TfL regarding use of the Grand Union Canal and River Lee Navigation canal and better dialogue to promote and deliver cross-boundary cycling schemes. It urges TfL to ensure that all stations are brought up to accessibility standards as soon as possible, in particular the stations that provide a gateway into the network for Hertfordshire residents including Stanmore, Edgware, High Barnet and Cockfosters. It opposes expansion at Stansted and Luton airports.

Highways Agency

The Highways Agency states that it is essential that the effects of growth and development on the Strategic Road Network (SRN) are mitigated and that there needs to be adequate public transport provision in place seeking to improve cross regional boundary connectivity. It notes that it is not against park and ride schemes in principle, but that it would oppose any that had an adverse impact on the trunk SRN. It proposes hard shoulder running on some sections of the SRN. It states that road travel demand needs to be carefully managed. It supports proposals to reduce existing demand on the network by implementing a range of measures aimed at influencing travel behaviours, combined with measures to manage residual traffic. It states that proposals regarding land use development should contain a reference to road safety.

Inclusion London

Inclusion London is concerned that accessibility, affordability and safety have not been given specific targets or timescales in the MTS. It states the steps taken by TfL to involve deaf and disabled people in developing the Disability Equality Scheme have not been taken in the development of the MTS; it also states that the Mayor should reinstate the step-free access programme as existed in the original strategy as well as encourage central London boroughs to adopt the Blue Badge scheme. It states that instead of developing a New Bus for London funds could be better spent on meeting the transport needs of disabled people and states that the proposed removal of the Western Extension Zone would result in a significant loss of revenue, and that plans for accessibility including Dial-a-Ride should not be delayed or abandoned. Inclusion London states concern over the removal of traffic lights, controlled crossings, allowing cyclists to cycle both ways along one way streets and shared spaces. It states that there should be no reduction in the range or scope of concessionary fares available.

Independent Disability Advisory Group (IDAG)

IDAG states that clear leadership is needed from the Mayor on the Disability Equality Duty and engagement with older and disabled people. It would like to see mention of hidden impairments and the use of clearer language with regards to terms for disability, impairment and accessibility. IDAG states that it wishes to see improvements in accessibility in the next 5-10 years such as London Overground being fully step-free and more London Underground stations being step-free, and a list of all stations where step-free access will be available. It states that there should be a standard approach to eligibility for Freedom Pass and concessions across London and wants more mention of

disabled cyclists and disabled hate crime in the MTS. It states that it is not convinced about the value of the New Bus for London and that the MTS should promote the Safer Travel at Night initiative to disabled and older people.

Institute of Advanced Motorists (IAM)

IAM welcomes the MTS and is pleased to see proposals for major improvements to public transport into and within London. It also welcomes the recognition of the importance of personal mobility and the need to encourage walking and cycling. However, it is concerned about the absence within the MTS of either recognition of the importance of cars and motorcycles to personal mobility, or positive proposals for the inclusion of cars and motorcycles in the strategy. It notes that cars remain the predominant form of personal transport for journeys outside the central London area and that motorcycles are growing in importance as a form of commuter transport. It welcomes proposals to tackle congestion but notes the shortcomings of the present single charge cordon operation of the Central London Congestion Charging Scheme and states that the system can be unfair. The IAM is pleased to see an emphasis on improving the quality of life and safety of those who live and / or travel within the Capital and feels that while emphasis is rightly placed on infrastructure improvements and the introduction of technological developments, greater emphasis needs to be placed on the responsibility of all road users for their own safety and that of those around them.

Institute of Civil Engineers (ICE)

ICE states that tough targets, to build upon the aim of the previous strategy by implementing modal shift from private to public transport, seem to be missing and it is concerned that the strategy offers no clear incentive for modal shift. It suggests that the quality and range of bus services need to be improved, that more signage and information is required at street level and that more information should be provided at bus / rail interchanges. It commends the iBus network and the existing Countdown system and notes that not all passengers will find mobile communication practical or convenient, so clear information needs to be provided at points of transit as well. It also states there should be a more recognisable way of providing bus service information. It commends the Mayor's commitment to Cycle Highways and Cycle Hire Schemes but notes that the barrier caused by road safety issues needs to be removed if any hope of a major increase in cycling is to be achieved. It is disappointed in the Mayor's decision not to go forward with the Thames Gateway Bridge and therefore welcomes the announcement of a review of the potential of river crossings in east London and urges that any Thames crossing provides a viable route for bus services, cyclists and walkers. It is supportive of demand management systems but notes that while public transport should be the only attractive option for accessing central London, in outer London the private car will still need to play a role. The ICE states that a stop-start approach to planning is causing delays in too many important infrastructure projects.

Jenny Jones Assembly Member

Jenny Jones welcomes much about the MTS but has concerns that long term problems are not matched by a definite plan, interim targets or a package of solutions: while there will be growing congestion of the roads in the future, there is no expressed desire to promote road pricing or to generate sufficient funding to implement larger scale traffic demand management; there is no plan or funding to promote cycling in outer London and hit the target of a 400 per cent increase in cycling; and there is no package of measures to reduce the policy gap in CO₂ emissions. She considers that the MTS threatens London's success in reducing traffic and encouraging people to shift from car to public transport by cancelling a package of improvements to deliver a further 10 per cent increase in public transport capacity ahead of 2025; the proposed removal of the Western Extension; making motoring cheaper in London, while public transport fares are raised above inflation; increasing capacity on the roads through traffic light rephasing; the proposed increase in car parking in outer

London town centres; and not including targets for traffic reduction. She considers that parking standards should be tightened in developments and that the impacts of traffic on air pollution, noise and road casualties should be more clearly set out. She agrees that planning is the key to the MTS, but considers there should be a dispersal of economic activity to inner and suburban centres with an improved web of rail lines linking the radial lines. She considers that the Mayor should reinstate a number of schemes in order to attract government and private funding with an additional focus on light rail and transit in outer London. She considers the emissions related congestion charge should be reinstated, that there should be a move to 100 per cent renewable energy and a zero carbon aim for TfL's fleet by 2025. She welcomes the cycling target and believes that cycling in London could ultimately take a larger modal share than Underground and rail and suggests an aspiration to have a level of investment in cycling over the next 15 years that is comparable to that being planned for rail and Underground. She supports borough wide 20mph zones and welcomes the trial of speed limiters on buses and taxis. She considers that air quality is worsened by the dropping of six-monthly licensed taxi inspections and the proposed removal of the Western Extension; considers that the 2010 implementation date for LEZ Phase 3 should be retained and that further measures are needed targeted at light goods vehicles. She has concerns about the impact of fare increases and reduction to the bus network on modal shift to sustainable transport.

Kent County Council

Kent County Council states that in general the proposals in the MTS are comprehensive and innovative but it calls for more references to areas outside and including the M25. It would like to know more about plans for Thames Estuary Airport; welcomes support for rail freight and support for new road / rail terminals in or near to London; is disappointed that the MTS will only consider, rather than support, the Crossrail extension beyond Abbey Wood to Dartford, Ebsfleet and Gravesend and that no reference has been made to potential new services available after completion of Thameslink works in 2015. It states that there is considerable scope to improve connectivity between Kent and London; and supports extensions of the DLR south of Lewisham and the Bakerloo line beyond Elephant & Castle; and calls for a new interchange at Lewisham and the wider utilisation of Beckenham Junction.

Licensed Private Hire Car Association (LPHCA)

The LPHCA is pleased that the MTS proposes working closely with London boroughs and other stakeholders to support improvements to Private Hire services with a focus on minicabs, but would like to point out that many other private hire vehicle services are also provided in the delivery of London's 'Door to Door' services. It will continue to support the Safer Travel at Night scheme and the campaign against touting and urges for ongoing action against illegal activity, followed by prosecution in the courts. As well as working to prevent street touting it would like to see further action to help stop the illegal invitation for the provision of drivers, vehicles and services on the internet and promotes the 'joining up' of drivers, operators and vehicles in order to aid this process. The LPHCA welcomes the proposal to provide facilities to pick up as well as drop off passengers where appropriate but stresses the importance of being able to park legally once passengers are set down. It also welcomes improvements to the licensing service and supports the proposal regarding lower emissions from private hire vehicles; and urges that licensed private hire vehicles should have bus lane access in order to reduce emissions and improve services.

Living Streets

Living Streets states that the MTS needs to be more ambitious for walking and cycling; there must be a cycling target of 10 per cent and support for more car clubs and road user charging. It states concern about proposals for smoothing traffic flow and the impact of countdown times on pedestrians. It states that powered two wheelers in bus lanes will reduce safety for pedestrians; that it is important

to consider walking at all interchanges and that it states support for Cycle Hire as well as stating that cycle training should include how to act around pedestrians; and that there should be a more permeable network for walking with informal crossing points on streets as well as making street design more pedestrian friendly. It states support for keeping the Western Extension Zone and would prefer the Low Emission Zone Phase 3 to start in 2010. Living Streets states that there should be more attention given to promoting car free development in London, emphasis on 20mph speed limits and would like walking in London to be benchmarked against other cities.

London Assembly

The London Assembly welcomes the fact that the MTS has incorporated some of the recommendations it made in its response to the Statement of Intent, but sets out a further four main issues which it would like to see addressed in the final Strategy. The first concerns unresolved challenges: it notes that the MTS forecasts rising population and employment and increased demand for travel resulting in public transport crowding and road congestion, even with the measures set out in the MTS. Additionally, there will be increased CO₂ emissions. It notes that the Mayor has said he will not implement further road user charging and calls on him to set out what alternatives there are to address the 'policy gap' for both congestion and CO₂ emissions. In its second point, it recommends the adoption of interim targets for public transport usage, walking and cycling. It also considers that, given that new infrastructure investment takes many years of hard work to secure, the final MTS should include information about how potential schemes will be progressed and funding secured for them. It states that there should be a discussion about the possibility of the Thames Estuary Airport. Finally, the London Assembly comments that, in the context of falling fare income and increased costs, it will be a challenge to pay for future transport improvements. Alongside planned increases to capacity (including Crossrail), programmes to modernise stations and provide step-free access have been reduced, and TfL plans to reduce the bus network by 8m km by 2017/18. It states that the Strategy should set out the Mayor's thinking on these challenges, stating the relative priority of schemes, the basis for future decision-making (e.g. on fares), the balance between improving conditions for different road users, and the potential for using financial incentivisation to bring about behavioural change.

London Borough of Barking & Dagenham

The London Borough of Barking & Dagenham states that there is much to welcome in the MTS but raises concerns about the plans for outer London and in particular the London Riverside Opportunity Area. It states that there needs to be enhanced access to local jobs, and identifies three key regeneration areas: Barking Town Centre, Barking Riverside and South Dagenham, and calls for better public transport links to and within these areas, including the Dagenham Dock DLR extension. It questions the figures shown in the MTS for the projected population and homes growth in the area and states that the transport investment proposed in the MTS does not support the planned new homes set out for London Riverside in the London Plan. It states that its policy is to maximise development opportunities around committed or proposed transport infrastructure, and that the Strategy should reflect this. It supports increased walking and cycling as a means to improve health as well as transport opportunities, and that improving access to jobs will also address health inequalities. It supports Crossrail, a more even implementation of Countdown across London, and plans to improve strategic interchange, calling for the prioritisation of Barking station and Dagenham Dock. With regard to river crossings, it favours a Gallions Reach option, but any scheme must be self-financing and there need to be appropriate improvements to the road network, namely the A13 at Renwick Road and Lodge Avenue. It is interested in becoming a Biking Borough and piloting a borough-wide 20mph zone. In future it would like to work with TfL on potential river services and how local routes (such as East London Transit) can benefit from a new hydrogen refuelling facility. It states that the MTS should recognise ways to reduce travel by encouraging, for example, home working, and says that parking regulations and charges should remain a borough issue.

London Borough of Barnet

London Borough of Barnet endorses the position set out in the London Councils response. However, it emphasises that car travel will continue to play a significant role in outer London and priority has to be given to making other modes more attractive or in improving the performance of less sustainable modes through reduced emissions, rather than penalising road users. It emphasises the importance of orbital movement to the borough and believes that improved high quality bus links should be provided where it is not possible to provide rail links, including limited stop express buses for journeys that cannot be easily made by rail. Improved travel choices on orbital routes have to play a key role in supporting the increase in population and demand for travel given the scale of regeneration and development in Barnet. It considers that improved bus services are the only realistic public transport option for these movements and that express services joining town centres, station and key interchanges will be necessary to provide an attractive alternative to car journeys. Barnet also consider there is a role for carefully targeted road schemes in delivering improvements in orbital movement, supporting regeneration and development, more generally in reducing congestion and achieving other benefits. It believes that further improvements along the North Circular Road, particularly at Henly's Corner and Golders Green Road have to be considered. It considers that the MTS should more clearly acknowledge the investment that may be required to implement the Sub-regional Transport Plans.

London Borough of Bexley

The London Borough of Bexley states that the MTS should be more streamlined and should focus on giving strategic direction, with more detailed analysis or proposals to be considered elsewhere. It stresses the importance of ensuring consistency between the three Mayoral strategies, as well as policies and proposals within the MTS. It calls for a review of all funding to meet the growth agenda in the Thames Gateway and the needs of outer London. It states that the MTS should recognise the pressing need for long-term public transport infrastructure improvements in Bexley, including the borough's aspiration to be connected to the London Underground network. It calls for a firm commitment to the Crossrail extension to Gravesend. It states that the flexibility for outer London boroughs to set local parking standards for offices should be extended to other use classes. It welcomes the intention to work with the boroughs but states that this needs further recognition in order to overcome the directional approach of the MTS. It stresses the importance that the MTS reflects the full recommendations of the outer London Commission when they are published. It welcomes the aim for a mode shift to walking, cycling and public transport but suggests a more realistic and progressive approach on the improvement of infrastructure, training and safety for cycling, in conjunction with walking. It calls for the MTS to recognise that orbital transport corridors are less developed in outer London than in Inner London. It states that little reference has been made to travel patterns in the east sub region, given the expected growth in the area. It stresses the importance that improvements are not limited to metropolitan town centres but also serve major town centres and other important centres of retail or employment activity. It states that the MTS should consider the potential for further tram schemes. It remains opposed to a fixed link at Gallions Reach. It supports the need for better cycle parking facilities and the possible use of Cycle Hire schemes in outer London town centres but notes that more needs to be done in outer London than Inner and central London to create a dramatic mode shift. It states that overemphasis on schemes such as Cycle Superhighways or Cycle Hire may detract from more substantive solutions. It welcomes proposals to reduce crime and anti-social behaviour, deliver significant investment to improve walking conditions and proposals for freight consolidation centres to facilitate the use of more environmentally friendly vehicles in urban town centres. It states that it should be recognised that charging schemes cannot be applied 'on a level playing field' across London. It notes that the level of bus subsidy is relatively small compared to the support given to rail based services

London Borough of Brent

The London Borough of Brent broadly supports the approach set out in the MTS, notes that the policies and proposals align with its own aspirations for transport and endorses the response provided by London Councils. However, it is concerned that there is insufficient detail in the MTS as to how town centres, Opportunity Areas and major developments are to be served with transport infrastructure and services and states that outer London town centres need improved orbital links as well as continued investment in radial connectivity. It welcomes recognition that decisions on local transport are often best made by boroughs and agrees that there is a need to invest in improved interchange. It states that there needs to be better integration of the National Rail network with other transport modes and that stations and service frequency must be improved. It notes that there are gaps in the west London orbital bus network and calls for the development of high-speed bus services and new infrastructure to address this. Brent supports further investment in orbital rail transport on the North and West London (London Overground) lines, but calls for these to be better linked to radial lines, particularly Crossrail. It welcomes the emphasis in the MTS on walking and cycling and supports proposals for cycle training, cycle parking, better journey information and the seven Strategic Walking Network Routes. However it is concerned about the apparent lack of a hierarchy of transport modes or a London Walking Plan, and is concerned that the promotion of electric vehicles could increase car dependency and increase congestion. Finally, while it supports the objective of a 60 per cent reduction in London's CO₂ emissions by 2025, it notes that continuing road traffic bottlenecks will affect air quality and calls for further measures to address this problem.

London Borough of Bromley

The London Borough of Bromley supports much of the Mayor's vision for transport, but is concerned that, even with the planned capacity upgrades, there will continue to be crowding on public transport and congestion on the roads, given the level of growth forecast. It states it will have little direct benefit from Crossrail and calls for more local rail capacity and for more priority to be given to improving orbital connectivity in outer London. It would like an extension of the DLR from Lewisham to Bromley Town Centre and a Tramlink extension to Bromley Town Centre, and more rail-based park and ride provision. It calls for a fundamental review of bus routes, with a view to securing greater value from the service, for example by changes to the timetable. It supports smoothing traffic flow and suggests further measures that could be used here. It supports the intention to increase cycling, and would like further development of recreational cycling routes, but believes that allowing cyclists to cycle up a one way street is a matter for national Government rather than the Mayor. Bromley opposes the proposal to set emissions-related parking charges, and states that this is a matter for boroughs to decide; similarly it states that boroughs must be allowed to decide on the location of infrastructure related to alternatively-fuelled transport. It does not believe that there is a case for road user charging and rejects this as a potential solution in Bromley. Finally, it notes uncertainty about future funding levels, and seeks assurance that the Mayor will not compel boroughs to raise additional funds for implementation of the LIPs programme.

London Borough of Camden

The London Borough of Camden welcomes sub-regional transport studies as an opportunity to examine local issues in more depth and is particularly keen to consider freight, taxis and buses. It is concerned about the lack of a road user hierarchy which prioritises pedestrians, cyclists and public transport and the drop in LIP funding to the borough. It is pleased to see proposals to enhance rail and Tube capacity but notes that even with these there will still be crowding and states that there is a case for further investment in Camden Town Tube station; it also advocates further encouragement of cycling and walking as a way of relieving pressure on public transport in central London and is keen to see alternatives to Cross River Tram. It calls for a strategic review of the bus network; more emphasis placed on developing electric and hybrid taxis as a means to address carbon emissions; and while it

supports smoothing traffic flow in principle, this must not induce more traffic nor be at the expense of pedestrians, cyclists and mass transit modes. Camden would like to have the Cycle Hire scheme locally and is supportive of 'better streets' initiatives, noting that it has pioneered these and that there must be scope for local adaptation; it also suggests that 'shared space' is a misunderstood term and could be re-defined. It welcomes proposals to improve air quality but states that there needs to be funding for emissions control schemes, and while it welcomes electric vehicles, these must not lead to a shift from more sustainable modes such as public transport. It would like more work on the use of freight consolidation centres in the Central Activities Zone; it is neutral on the proposed removal of the Western Extension and states that any further road user charging schemes must be developed in conjunction with the boroughs.

London Borough of Croydon

The London Borough of Croydon supports and endorses the basic premise and principles of the three strategies. It would welcome more flexibility on planning parking standards; regards the extension of Tramlink as essential to provide greater orbital connectivity; considers greater emphasis is needed of Croydon's relationship with Gatwick; and that recognition of Croydon as a major factor in the resurgence and growth of South London should be matched by appropriate investment in infrastructure. It welcomes the six overarching goals of the MTS and the increased emphasis on improving transport in outer London but is concerned at the deliverability of the proposals given the level of funding and delayed programming. It welcomes the strong line that is taken on sustainability and recognises that choice has to be a key principle but has concerns over the ability to persuade people to leave their cars at home. It welcomes the commitment to improve orbital movement for outer London, but beyond the completion of the East London line extension, particularly in light of the decision not to progress work on the Crystal Palace Tramlink extension. It feels the strategy does not adequately address the need to improve access to jobs, services and opportunities and believes that local transport services should be prioritised. It welcomes the Mayor's principle of improving the integration of economic development, transport, spatial and land use planning as a means of affecting travel patterns and reducing the need to travel and considers that transport policy should also be integrated with other policy areas including health, education and duties under the Traffic Management Act. It welcomes the renewed emphasis on a better allocation of surface space between pedestrians, cyclists and motorised modes, together with an improved public realm and hopes that TfL will continue to allocate adequate funds to boroughs to implement high quality integrated schemes to support local trips by sustainable modes. It considers that severe congestion at East Croydon station has been overlooked and that policies within the strategy are predominantly supportive of improvements to radial capacity with little commitment to enhancing orbital movements.

London Borough of Ealing

The London Borough of Ealing stresses the need for clarity on and commitment to transport investment and states that emphasis should be given to identifying and providing appropriate investment. It is concerned that the policies and proposals in the MTS will not provide sufficient transport capacity to meet forecast demand. It states that there is no ambition to cut journey times or support for removing bottlenecks on the road network except through smarter travel initiatives. It states that there are not enough proposals to support the Outer London Commission's recommendation of developing a 'hub and spoke' network. It suggests that the orbital transport provision in west London should be connected with Crossrail at the Old Oak Common interchange. It states that there are no proposals to improve orbital public transport near Ealing even though the strategy recognises the need for orbital travel to Heathrow. It states that there is no detail on how town centres, Opportunity Areas and major developments are to be served by transport infrastructure and public transport services. It states that there is a need for better communication and partnership working with TfL over the development of bus services and that there needs to be a review of the existing bus network and of the proposals that provide improved connectivity to Crossrail. It states

that there is a major potential role for orbital buses on key corridors, in the absence of orbital rail links, and notes that there is no reference to express bus services in the strategy. It states that some major interchanges and interchange proposals in Ealing are not mentioned in the strategy. It would welcome encouragement in the strategy for 20mph zones and shared space schemes. It considers that the draft MTS lacks a plan to improve accessibility and is disappointed by the cancellation of the step-free access project at Greenford station. It states that aviation plans are not satisfactorily detailed in the strategy, opposes expansion of Heathrow and would support fully developed proposals for alternatives. It would welcome an attempt to reform smarter travel initiatives to reduce carbon emissions by focussing on movements that are carbon intensive. It states that there is no mention of the role of freight quality partnerships in addressing freight problems in the strategy. It stresses the importance of ensuring that there is consistency between the objectives of the three Mayoral strategies.

London Borough of Enfield

The London Borough of Enfield substantially agrees with the MTS as it accords well with its own aims and aspirations. It supports the recognition of the importance of outer London; the recognition that a high proportion of the population is dependent on car travel; the London Street Works Permit initiative; proposals for improving physical accessibility; the inclusion of an Implementation Plan; and the Mayor's criteria based approach to road schemes. It supports the broad perspective of the MTS to induce and encourage mode shift to public transport, cycling and walking without disproportionately penalising car drivers. However, it is concerned about the level of economic and employment growth used for the strategies and considers that MTS must make clear provision for the required development of new transport infrastructure implied by and concomitant with the anticipated growth as measures to extract more capacity from the existing infrastructure are unlikely to be adequate, as evidenced by the West Anglia rail corridor. It considers that orbital routes are poor or non-existent in many sectors of North London and that the lack of orbital transport is a crucial factor in the development opportunities in areas such as North East Enfield, being frustrated by inadequate accessibility by both public and private transport and proposes a fully integrated package of measures including the Northern Gateway Access Package. It considers that a comprehensive review of the bus network is required, including an audit of costs and benefits, with the provision of buses, bus priority, bus stops and bus stands based on audited bus usage figures and kept under regular review. It does not consider young people should receive free travel other than for school journeys. It considers that clear policy guidelines relating to parking and consistent standards across London are required. It considers the MTS proposal on door-to-door transport should be based on the recommendations of the London Councils commissioned report. It considers that uninsured or untaxed vehicles should be excluded from controlled parking zones and favours a return to effective traffic policing dealing with careless driving instead of focusing on speed cameras. It considers that there is a strong case for access to health care to be explicitly recognised as a transport need. Enfield supports the MTS cycling initiatives but has reservations over cycle superhighways in terms of the viability of cycling for commuting in outer London and the implications for other traffic of reducing road capacity. Enfield lists local areas of concern including the need for grade separation of the North Circular Road; North Eastern Enfield including Ponders End; connectivity in Central Leaside, the importance of four-tracking of the London-Cambridge railway for regeneration, problems with level crossings and the extension of the Victoria line to serve Central Leaside; and congestion on the Great Cambridge Road / A10.

London Borough of Greenwich

The London Borough of Greenwich concurs with the broad goals of the MTS but is concerned that there is a lack of long-term infrastructure investment for the Thames Gateway and South East London areas. While it welcomes Crossrail, it indicates that this will not improve certain links in the borough and calls for the extension of the DLR from Woolwich both into the Thames Gateway and south

towards Eltham; it also states that options for Bakerloo line extensions should cover the south west of the borough or consider a further extension of the Jubilee line. It also calls for a review of the bus network, measures to address local congestion caused by the Blackwall Tunnel and a commitment to the development of river services in the east. It states that the new High Speed 2 terminal should be in Stratford so that it connects with both High Speed 1 and Crossrail. The borough would like to see replacement proposals for the Greenwich Waterfront Transit and states that Tube upgrades should not be at the expense of other modes of transport such as buses.

London Borough of Hackney

The London Borough of Hackney considers that the MTS is not ambitious enough and lacks forward thinking proposals, although it supports previously publicised proposals such as encouraging cycling, improving the public realm and improving orbital interchanges. It expresses disappointment that additional demand measures, such as road user charging, will be required to meet the objectives of the MTS when the Mayor has already publicly ruled out implementing additional road pricing schemes while in power. It considers the MTS is not ambitious enough to counter the problems of traffic congestion, public transport overcrowding and poor air quality that disproportionately affect Hackney. It also considers the MTS fails to fully embrace the commitments to the Olympic legacy in East London, as set out in the Five Host Borough Strategic Regeneration Framework. It welcomes the commitment to the Chelsea-Hackney Line but would like to see an early timetable for completing the strategic review of the route and, while supporting the current route, considers that it may be prudent to reserve alternative more deliverable policy options to ensure that population growth will be matched by infrastructure improvements and would also like to see commitment to orbital (London Overground) and radial (West Anglia rail corridor) rail networks improvement. It considers decisions on investment in transport infrastructure should reflect the parts of London where significant population and employment increases will take place. It welcomes the updating of climate change targets but would like to see interim targets set. It considers that the MTS should address the potential for worsening congestion as a result of regeneration and economic development and should make mode shift from cars to more sustainable modes a priority. It strongly opposes the Mayor's intention to continue to increase bus fares and reduce total kilometres of the bus network and considers this will disproportionately impact on Hackney residents where bus is the main mode of transport. It supports the electric vehicle delivery plan proposals but believes that pedestrians, cyclists and public transport should be prioritised over private vehicles and that control of parking policy and charges for electric vehicle charging bays needs to remain with boroughs. It is concerned about the removal of the Western Extension Zone because of the potential impacts on bus journey times, traffic and air quality and that this contradicts the Mayor's proposals to improve air quality, reduce CO₂ emissions and generate income to fund transport improvements in London. Finally, it believes that continued growth at Heathrow is unrealistic.

London Borough of Hammersmith & Fulham

The London Borough of Hammersmith & Fulham reiterates its support for the removal of the Western Extension of the Congestion Charging Zone and states that measures to improve traffic flow on the borough's north-south roads should accompany this removal. It welcomes Crossrail but is disappointed that there has been no mention of a possible interchange at Old Oak Common, where the confluence of several railway lines offers a good opportunity for interchange; it also states that this could be a hub for High Speed 2, and stimulate regeneration in this part of London. It also calls for the relocation of the A40 northwards, to release land for development and smooth traffic flows. With regard to borough priorities, it identifies the following: improved traffic flow on north-south roads; upgrading of the District line; and improved east-west links at Fulham Riverside, including a re-routing of the Chelsea-Hackney line and a cyclist and pedestrian bridge at Imperial Wharf / Chelsea Harbour. It welcomes initiatives to encourage cycling but states that superhighways need to be agreed with boroughs and for cycling training to be targeted on enabling more women, children and older people

to cycle. Finally it calls for quieter, low-emission buses, a restoration of the through service to Gatwick on the West London line and for electric vehicle charging points to be provided off-street.

London Borough of Haringey

The London Borough of Haringey welcomes the broad perspective of the MTS and the coverage of accessibility, safety, the importance of public realm and support for the role of outer London. It welcomes the proposals for infrastructure improvements to address the predicted increase in demand for travel, the continuing importance of works at Tottenham gyratory and the opportunity to work with TfL on infrastructure proposals such as the review of the Chelsea–Hackney line. However, it is concerned that all three of the Mayor's strategies are based on the prediction that employment growth will be concentrated in inner London, the Central Activities Zone and along the Crossrail route, which will reinforce the existing radial travel patterns on overcrowded transport links and not reduce the need to travel or lead to shorter journeys being made. It is concerned that the planned growth could lead to more journeys over 5km, particularly car journeys which will exacerbate the severe traffic and environmental problems Haringey already experiences due to the number of strategic radial routes through the borough. It is not convinced that the measures in the MTS will help tackle increases in medium and long car journeys and considers that a polycentric approach to growth around London metropolitan town centres and interchanges with investment in orbital routes could promote less car travel. It considers that the MTS should set out how specific infrastructure measures will be promoted and delivered to support the predicted growth and support policies on road congestion and climate change. It welcomes the identification of Wood Green as a metropolitan centre and considers it should be identified as a priority strategic interchange, which would also assist promotion of orbital movements. It is concerned no funding has been committed to lengthening trains on the Gospel Oak-Barking line with the implication that growth will lead to overcrowding; does not support replacing road humps with other speed reduction alternatives; considers more support is needed for transport behavioural change in outer London; considers that measures for improving and managing congestion on the North Circular Road should smooth traffic and not lead to road capacity being increased; and considers the priority for public transport improvements must support internal London movement and not commuting.

London Borough of Harrow

The London Borough of Harrow agrees with much of the MTS, noting that many issues are reflected in its own plans. It particularly welcomes the principle of encouraging higher-density housing in areas with good public transport accessibility; it also supports the wider use of Smarter Travel and travel plans and agrees that the climate change agenda should have a high priority. With regard to road user charging, it states that outer London boroughs will have to consider the viability of their town centres if they are to consider it. The borough supports initiatives to reduce street clutter and improve the environment for pedestrians and cyclists. However, there are a number of matters related to West London and Harrow which it states are insufficiently addressed in the MTS: the need for accessibility improvements at Harrow on the Hill station and the distinction between potential metropolitan centres and major centres compared to metropolitan centres. Additionally, it states that there must be specific funding provided to boroughs for initiatives including Legible London and cycle superhighways, or there is a risk that these will not be implemented. It calls for better connectivity to airports (including Harrow to Gatwick); orbital links from Crossrail to the borough; and the completion of the Strategic Walking Network.

London Borough of Havering

The London Borough of Havering is pleased that the MTS has generally acknowledged the challenges facing outer London. It supports the encouragement of further modal shift towards walking, cycling and buses and commends the Mayor's willingness to work with the boroughs to implement the

strategy. It states that the delivery of Crossrail in full by 2017 is its top priority and that extra funding should be available for boroughs in which Crossrail stations are located. It states that the MTS should include mention of Mayoral support towards a new station at Beam Park on the Fenchurch Street line. It supports the aspiration for common service standards to be achieved on London's National Rail services. It asserts that the Dagenham Dock extension of the DLR should be given priority over other potential extensions. It welcomes all proposals regarding London Underground. It supports the proposal to keep the development of the bus network under regular review and states that high priority should be given to the implementation of Countdown 2. It welcomes proposals regarding coach services, taxis and private hire vehicles and is pleased to see support cited for taxi marshalling measures. It supports the rationale of proposals for managing the road network and states that the utilisation of advances in intelligent transport systems technology warrants priority. It supports proposals regarding the Blue Ribbon Network but states that ferry crossings are poor alternatives to fixed crossings. It supports the Mayor's approach to aviation, especially the proposal to improve access to London's airports by public transport and the absence of any proposal for a Thames Estuary Airport. It accepts proposals for a more accessible transport system and stresses the need to maximise the accessibility benefits of new transport schemes and better streets initiatives. It considers the definition of strategic interchanges to be too narrow and that Romford should be identified as a strategic interchange. It states that more support is required if the proposed increased cycling levels in outer London are to be achieved. It states that wayfinding in outer London should extend to cyclists and equestrians as well as pedestrians and that Legible London is not appropriate for more rural locations. It welcomes the range of actions and initiatives to improve public transport and road safety and reducing crime and terrorism threats. It commends the proposal to integrate local policing structures on the transport system. It notes that while the introduction of average speed cameras would be preferable, in the absence of funding the introduction of road humps might be worthwhile. It supports the aspiration to extend car clubs and proposals regarding low carbon infrastructure and adapting to climate change. It is broadly supportive of proposals for demand management and proposals relating to better journey planning and information. It stresses the importance of a fully-integrated London fare-collecting system and welcomes flexibility for outer London in terms of applying parking standards. It maintains its view that road user charging should not be introduced to further areas unless it follows comprehensive consultation and has clear support from the relevant London local authorities. It states the views of those local authorities covered by and bordering the Western Extension Zone should be given considerable weight when deciding the future of the Zone.

London Borough of Hillingdon

The London Borough of Hillingdon is generally positive about the MTS, although it raises a number of specific local issues which it states have been insufficiently addressed, in particular how public transport connectivity and services to key town centres like Uxbridge will be improved. It welcomes the upgrade of the rail network and the Metropolitan line and suggests that Airtrack could be extended to Hayes and a re-consideration of the business case for the Central line diversion to Uxbridge. It is concerned that the proposed requirement for bus services to provide good value for money could lead to less emphasis being placed on accessibility and deprivation and makes a number of suggestions for local improvements, including interchange, orbital services and potential bus priority measures. It states that there needs to be improvements to taxi driver behaviour, including an Operator Recognition Scheme similar to that available for freight, and that TfL could consider supporting the Community Transport Association as a means of improving demand responsiveness. With regard to Heathrow, it opposes capacity increases and suggests that the Mayor's support for High Speed 2 be linked to reduced short-haul flights and less local road congestion; there should also be proposals for reducing emissions from ground-based operations. It would like to see more on addressing emergency issues - such as flooding - in the MTS, and would welcome guidance to councils on improving access to town centres, shared-space schemes and 20mph zones. Also, it states that there needs to be more detail on freight strategy and is keen that electric goods vehicles, break-bulk

facilities and consolidation centres are all deployed. It welcomes emissions-based parking charges and agrees with a fair charging system for managing demand and it supports alternative measures to the Western Extension.

London Borough of Hounslow

The London Borough of Hounslow states that the MTS has limited provision for notable investment in orbital transport in west London. It suggests that provision should be made in the strategy for a feasibility analysis of the West London Orbital Railway. It states that the strategy should provide detailed evaluation of additional interchanges to link the North London line to Crossrail and that a new outer London north-south rail route should be a priority after the completion of Crossrail. It supports the seven day railway initiative. It states that the development of an orbital network of express bus routes should be considered. It questions why parking policies are not referenced in detail in the strategy. Its key areas of interest are improvements to street scenes, journey time reliability and transport safety. It states that improving information is one of the most cost effective ways of achieving modal shift. It supports the promotion of sustainable transport, especially cycling and the decarbonisation of transport. It supports Electric Vehicles, but it notes that these are unlikely to yield significant benefits in the short term. It welcomes targets for modal shift and CO₂ emissions but states the need for interim targets and fundamental changes to the CO₂ efficiency of vehicles and travel behaviour. It requires clarification on support available to authorities wishing to develop their own road user charging schemes or Low Emission Zones but notes that the schemes would be best implemented at a regional level. It calls for clarity on the likely trigger points determining when London-wide road user charging would need to be introduced. It welcomes the focus on smoothing traffic flow. It strongly opposes expansion of Heathrow and supports the promotion of reduced aviation emissions and sustainable transport to airports. It stresses the need for more concrete and funded proposals to meet cycling targets and more incentives to become a 'Biking Borough'. It encourages the roll out of Cycle Hire in outer London. It supports measures to make walking count but warns that methods to smooth traffic flow might create barriers for walking. It encourages working in partnership with the NHS to promote walking. It supports aspirations to reduce the need to travel and the environmental impacts of transport. It stresses the need to develop infrastructure to support smarter travel, and suggests the introduction of High Occupancy Vehicle lanes. It supports the upgrading of the Tube network, especially the Piccadilly line. It states that improving the accessibility of suburban stations should be a priority, with at least four fully accessible Tube stations in each outer London borough. It supports the improvement of perceived safety and security at unmanned stations and the development of new interchanges to link existing lines. It states that there is potential for growth in freight and waste traffic on the Thames and additional crossing options for pedestrians and cyclists in west London.

London Borough of Islington

The London Borough of Islington identifies the following measures as being of most benefit: more frequent trains and further extensions of the Tube; building more rail lines and the use of Oyster pay as you go across all rail; improvements to interchanges including public realm improvements and providing more capacity. It supports measures for cycling and walking but seeks funding for the London Cycle Network; and notes that it has delivered many public realm improvements in the borough and needs TfL to work with boroughs on improving the TfL Road Network (TLRN). It advocates the provision of good quality information at bus stops and on buses, supports shared space schemes and is critical of the disbandment of the Commercial Vehicle Education Unit (CVEU). It states that accessibility is important but would like to see an exploration of other ways of delivering this on the Tube in place of the step-free programme. It agrees with a fair system of demand management and calls for the MTS to include interim targets that, if not met, will trigger the introduction of these measures, including road user charging. It disagrees with the proposal to remove the Western Extension, stating that this will undermine the achievement of the Mayor's carbon

reduction target. It is disappointed that schemes to enhance local Tube station capacity are not in the TfL Business Plan and is keen to work to remove more gyratories. It advocates a 20mph speed limit in all residential areas and is concerned that smoothing traffic flow and reducing congestion is not pursued at the expense of making cycling and walking less safe. It states that its LIP funding is insufficient for Islington's projected growth; urges a review of door-to-door bus services; and does not support the proposed delayed implementation of Phase 3 of the Low Emission Zone. Finally, it opposes any significant expansion of airport capacity and recent bus fare increases, calling for a more flexible ticketing system.

London Borough of Lambeth

The London Borough of Lambeth identifies a number of common concerns regarding the MTS, the London Plan and the Economic Development Strategy, these are: an insufficient link between planning and transport provision; a lack of identified investment; and the need for development of particular parts of the borough. It stresses the need for the strategy to include clear targets for the Boroughs. It supports the proposal to relieve London of 'through' rail freight and proposals to seek further capacity on National Rail and London Overground services but notes that the Thameslink Programme will negatively effect Lambeth commuters. It stresses the need to improve radial link services across Lambeth. It emphasises the need for a stop on the East London line at Brixton and states that Brixton should be included as a strategic interchange. It states that ceasing the operation of the South London Line will adversely affect Lambeth residents and regeneration plans in the Vauxhall area. It welcomes the intent to develop Crossrail 2 provided it will not have any adverse impact on Lambeth. It strongly welcomes proposals to improve station environments at London's most congested stations. It stresses the importance of a Tramlink extension to Lambeth. It supports the proposals regarding coaches, taxis, minicabs and extensions to London Underground and would welcome the development of the bus network. It acknowledges that it is not possible to fund the construction of the Cross River Tram at present but is keen to see alternatives that would offer the same transport and regeneration benefits. Lambeth broadly agrees with the principles behind the proposals to make London a cycling city but stresses that additional provision for cycle parking must not conflict with priorities to remove street clutter. It recommends provision for cycle parking at workplaces, residential areas and outside key areas for services. It supports the principle of cycle superhighways but has concerns about road safety. It would be interested in becoming a 'Biking Borough'. It is disappointed at the removal of the Commercial Vehicle Education Unit and urges its reinstatement. Lambeth supports measures to encourage more people to walk and stresses the importance of information campaigns and improved signage. It believes in certain circumstances that road space will need to be transferred from motorised forms of vehicles to pedestrians and cyclists. It also supports a Road Danger Reduction strategy to overarch all policies, the reinstatement of the road user hierarchy, 20mph zones on all residential streets, cycle permeability, wider publicity of cycle training and more thorough enforcement of the law on speeding and driving while using a mobile phone. Lambeth agrees with the proposals put forward to improve public transport safety. It suggests that road safety education for drivers should be provided in the workplace. It is concerned that the Mayor's vision to smooth traffic flow may be to the detriment of pedestrians and cyclists. Lambeth agrees with the proposals to reduce crime, the fear of crime and antisocial behaviour as well as responding to the threat of terrorism. It endorses proposals for better streets. It agrees with the proposals to improve noise impacts and enhance transport's contribution to the natural environment. It is pleased to see that proposals to improve air quality contain smarter travel interventions as opposed to just technological improvements. It disagrees with proposals for the relaxation of parking regulations for electric vehicles. It is supportive of technological advances to improve air quality and the environment. It agrees with the proposals put forward for demand management and would support road pricing in principle providing certain conditions are met. Lambeth states that it would be detrimental to remove the Western Extension Zone.

London Borough of Lewisham

The London Borough of Lewisham welcomes many of the policies with the emphasis on improving public transport accessibility and capacity, commitment to improving walking and cycling, the emphasis on reducing carbon emissions, and the desire to have greater influence over National Rail services. It supports the need to integrate Crossrail with the transport network, in particular with the London Overground network at Whitechapel. It supports the planned rail improvements and considers that the London Overground concept should provide a template for common service standard across London. It welcomes the improvements to the London Overground network but is disappointed the construction of Surrey Canal station was not included in the original announcement. It considers that the Bakerloo line extension is preferable over a south DLR extension and would allow the line to serve inner and outer southeast London serving areas of poor transport accessibility and freeing up National Rail capacity at London Bridge. It considers a Victoria to Orpington service via Catford and Bromley South to be an ambition and that Lewisham station requires significant investment as a key interchange. It supports London Councils' proposal for the development of a bus strategy for London. It is concerned about the impact of allowing motorcycles to use bus lanes and strongly supports the street works permit scheme. It wishes to be involved in discussions on future river crossings and in the development of cycling superhighways. It is unclear about what the biking borough approach means in practice and is interested in understanding the effectiveness of the cycle hire scheme and the practicalities of extending it to Lewisham. It considers that it will be difficult to enforce 20mph limits when the speed limit is much higher and would like a greater understanding of the effectiveness and public acceptability of time distance enforcement cameras. It considers that safety should be paramount when considering the removal of traffic signals.

London Borough of Merton

The London Borough of Merton is disappointed that there is no guidance in the MTS on how Merton as an outer London borough can deliver the transport improvements it requires to achieve as part of its 2030 vision. It is particularly concerned about the lack of information on when the issue of dysfunctional gyratories will be addressed, including those in Morden and Colliers Wood. Additionally it notes that extending Tramlink is particularly important to Merton and is therefore disappointed that no extensions to the tram network are proposed. It also believes there is a strong business case for re-designating Morden Tube station as Zone 3 in order to support regeneration of the town centre. It suggests that there needs to be a separate funding pot for outer London transport infrastructure in order to bridge the gap in quality between that in outer London and that in central London. Merton is pleased to see the proposals on the promotion of common service standards across London's rail network, the consideration of Crossrail 2, improved capacity on Thameslink routes and the commitment to cycling. However it would like to see more on the importance of transport regeneration in South London, a stronger emphasis on the tram and on walking, a clearer message on the future of bus services in outer London, a further commitment to orbital routes, clarity on the future of the Thameslink loop and its services and more on community transport to reflect the ageing population. It states that there are too many policies in the MTS and that those in the London Plan do not need to be duplicated. It suggests that proposals be rationalised where possible, for example combining proposals related to air quality and climate change. Additionally it states that there is a lack of clarity on the role of boroughs in delivering the strategy. Merton would like to see addressing climate change as the overarching theme of the strategy.

London Borough of Newham

The London Borough of Newham emphasises the importance of delivering the Olympic legacy via the principle of convergence, and states that the MTS should set out the transport policies and actions to achieve this. It welcomes the aim to have High Speed 1 services at Stratford International and calls for this to be directly linked to High Speed 2. With regards to DLR, it calls for an extension northwards

from Stratford International and is disappointed about the postponement of the Dagenham Dock extension. It agrees that good logistics infrastructure is important and states that local businesses could benefit from facilities next to High Speed 1 in Barking. It notes the economic role that transport fulfils both as a local employer and in bringing visitors to the area. With regard to river crossings, it states that a Silvertown crossing alone would be insufficient and looks forward to working with TfL on the future options, particularly a crossing at Gallions; it also sees merit in a new Gallions ferry. It supports cycling schemes but is keen that initiatives that reallocate road space are assessed on their individual merits on a site-specific basis and with a consideration of their impacts on other road users; it also welcomes proposals to encourage walking and enhance the public realm. Finally, it notes the importance of buses in the borough and calls for clarification of Stratford's status as a Metropolitan Centre.

London Borough of Redbridge

The London Borough of Redbridge welcomes the proposals to bring about a cycling revolution by raising awareness and improving cycle amenity in the boroughs. It would welcome a rapid roll out of the Cycle Hire Scheme in outer London, a feeder network for the Aldgate to Ilford Cycle Superhighway and the introduction of high quality, waterproof shelters at stations. It has some concerns about air quality and accident prevention on parts of the Strategic Road Network. It supports the introduction of Legible London and the use of emerging technologies to assist in dissemination of local travel information. It states that pedestrian access to stations and interchange need to be improved as well as access to town centres and local amenities. It supports proposals to address crime and fear of crime issues through better design of public spaces and supports the de-cluttering of the urban realm. It states that improving safety and security is a high priority. It supports initiatives to address HGV and freight safety and promotional initiatives and campaigns that target vulnerable groups. It welcomes proposals to improve London's environment through the better streets campaign, targeting noise impacts, public transport's contribution to the natural environment and generally targeting improvements to air quality. It supports the London Low Emission Zone and subject to technical feasibility would support the roll out of Phase 3. It welcomes proposals to reduce CO₂ emissions. It supports proposals to manage the demand for travel, notably through better journey planning and information incorporating smarter transport for both people and freight. It would like to see a business case before consenting to any road user charging scheme but notes that if a fair system could be developed and revenue was distributed to address congestion along the busy arterials into London then this proposal may have merit. It opposes the removal of the Western Extension Zone and notes that further measures, including improved traffic control systems and a road works permit scheme, should also be considered to mitigate the growth of traffic. It is concerned that schemes such as Crossrail, Transforming the Tube and the Cycling Revolution have dominated the strategy and states that there is a need to invest in the development of a polycentric London with significant radial routes, notably a river crossing in east London.

London Borough of Richmond upon Thames

The London Borough of Richmond upon Thames welcomes the recognition of the role of boroughs in identifying and delivering transport improvements to the road network. It is fully committed to cycling and walking and their integration with other modes of travel. It supports the Cycle Superhighways initiative and the principle of providing a dedicated road-space to cyclists but would like to see a network of orbital, as well as radial routes and feeder routes. It supports Airtrack and states that appropriate technologies can help mitigate the impact of constructing it. It welcomes the Crossrail proposals but wants to see a similar level of commitment to invest in promoting new orbital rail routes. It opposes expansion of Heathrow Airport. It states that it is important to keep an appropriate level of funding in London Bus Priorities Network, particularly in the context of outer London boroughs that are not well resourced with Underground and Overground rail networks. It suggests that Sub-regional Transport Plans could be an effective way to achieve a better local bus network. It supports the

Mayor's agenda on Climate Change and CO₂ emissions but states that the CO₂ target would benefit from interim targets. It supports the proposal to promote a lane rental system. It notes the importance of sub-regional planning to address cross-borough and shared transport challenges and objectives and would like to see further details and full consultation in defining the roles and responsibilities of the sub-regions. It supports electric vehicle charging point proposals in principle but suggests that investment in infrastructure is carefully balanced with current and future demand. It supports the opening up of bus lanes to coaches, minibuses and motorcycles.

London Borough of Southwark

The London Borough of Southwark states that while the MTS recognises the important link between transport improvement and land-use growth, it lacks ambition. It states that there should be further funding committed to the improvement of key transport interchanges in Southwark, and at Elephant & Castle and Peckham Rye in particular. It asserts that in the absence of firm proposals for a Cross River Tram (CRT), a deliverable alternative must be developed to improve accessibility for the Aylesbury and north Peckham areas connecting with Elephant & Castle and through to central London. Southwark welcomes the possible extension of the Bakerloo line and in view of the cancelled CRT scheme wishes early engagement over the options for the extension, where provision for Camberwell can also be considered. It suggests that the future of the South London Line, when known, should be included in the MTS and also notes its uncertainty over the East London line phase 2 with regard to the proposed Surrey Canal Road station and Brixton High Level. Southwark considers that there is a need for a more fundamental analysis of bus provision across London, rather than incremental review, and states that there is a need for bus timetabling to take account of school children. It supports the improved coordination of works on the highway network but encourages a more rigid, detailed and longer term programme to support the overall reduction of traffic. It welcomes the positive approach taken to encourage greater use of the Thames. Southwark states that road safety should have a greater weighting within the strategy's policies and is disappointed that the strategy does not set out a coherent speed reduction programme that would support Southwark's own 20mph strategy or acknowledge the wider benefits of reduced speed limits. It welcomes the focus on enforcement but notes that no new resources are identified for this purpose. Southwark suggests that the strategy does not set out a convincing approach for encouraging walking. It states that while the strategy acknowledges that there is a potential conflict between the focus on smoothing traffic flow and improving the public realm, there is no indication of a clear strategy to resolve this. It welcomes cross-borough initiatives to promote cycling but is disappointed that there is no clear programme or additional funding identified to deliver the concept of 'Biking Boroughs'. It notes that the document lacks a coherent strategy to achieve the challenging CO₂ targets and that local air quality factors are also not considered sufficiently. It suggests that more may have to be done to manage demand on the road network in order to reach the challenging targets for CO₂.

London Borough of Sutton

The London Borough of Sutton supports the six overarching goals of the MTS which it considers builds on the success of previous approaches, and is pleased to see the greater emphasis on outer London. Although it recognises their importance to London as a whole, it notes that Sutton will not directly benefit from Crossrail, the London 2012 Olympic and Paralympic Games or Tube upgrades, and states that outer London boroughs must continue to receive funding for smaller scale local improvements, for example Smarter Travel. It notes the success of this programme locally and, in this context, calls for a more ambitious target for cycling mode share. It would like further enhancements to orbital bus services; a commitment to improving connectivity across the GLA boundary; and for all bus stops to be fully accessible. It supports proposals for smoothing traffic flow as long as these are not at the expense of pedestrians and cyclists, and it welcomes measures for better streets, including shared spaces. It welcomes the call for greater Mayoral powers over National Rail, and the requirement for London Overground style standards on the network, but notes gaps in the rail

services from Sutton; it would also like an extension of Tramlink to Sutton Town Centre. It states there is a need to reduce road traffic and is supportive of measures to improve road safety, including 20mph zones, safer driving and improved street lighting. It considers that there needs to be a greater emphasis on demand management of aviation and further consideration given to public transport access to airports. It suggests a number of measures which could improve air quality, such as enforcement of regulations on engine idling and further uptake of electric and low emission vehicles; it is also keen to reduce noise from aircraft and vehicles locally. Finally it states that there is a case for a review of the concessionary travel scheme and that consideration should be given to more flexible ticketing.

London Borough of Tower Hamlets

The London Borough of Tower Hamlets identifies its four main priorities for the transport system as follows: providing better access; connecting communities and places (including Hackney Wick and Bromley-by-Bow interchanges); promoting sustainable travel (including opposition to further expansion at London City Airport); and delivering new strategic transport infrastructure, including cycle hire scheme, pedestrian and cyclist river crossings, electric vehicle charging infrastructure. It supports Crossrail 2 and would like High Speed 2 to connect with High Speed 1 at Stratford; it identifies a number of stations in the borough for step-free access and it would like consideration of a Central line or other link to Hackney Wick. With regard to buses, it welcomes measures to make the fleet more attractive, such as Countdown, but is concerned about capacity issues on crowded routes following withdrawal of articulated buses and also calls for more investment in physical accessibility on the network. Traffic smoothing should not compromise pedestrian and cyclist safety, TfL should promote the take-up of low emission taxis and, while welcoming greater use of the Thames, it states that fare levels are currently prohibitive. It opposes expansion of runway capacity in London, indicating that High Speed 2 offers the opportunity to switch some flights to rail. It is concerned about noise and air quality impacts of road river crossings and would like TfL to commit to reducing road accidents on the TLRN in every borough. It describes its own Clear Zone plans and welcomes the proposal to encourage electric vehicles and improve the public realm. Finally it welcomes the CO₂ reduction target and states that demand management tools like road user charging are required to achieve this and could also provide funding for future transport infrastructure.

London Borough of Waltham Forest

The London Borough of Waltham Forest states its support for the Cycle Superhighways and cycle hire scheme and its potential future extension to outer London. It states that a road user hierarchy is still useful and supports 20mph speed limits on residential streets, but is concerned that smoothing traffic flow could disadvantage pedestrians. Waltham Forest proposes several specific rail recommendations such as improved connectivity between Waltham Forest and the Stratford / Lower Lea Valley area, and states support for Crossrail, the Chelsea-Hackney line and the electrification of the Gospel Oak to Barking line. It states opposition for continued increases to bus fares and states that fare increases should not reduce the attractiveness of the bus relative to the private car. It states support for the forthcoming Countdown bus signs and the Mayor's intention to develop London river services, but states that river services should be better integrated into the overall transport network. It states that more emphasis should be placed on improving orbital transport links as well as enhancing capacity on radial routes; it also states its concern that rephasing traffic lights may increase traffic speeds. Waltham Forest states that a 5 per cent mode share for cycling by 2031 is insufficiently ambitious and underrepresented groups such as women, children and older people should be encouraged to cycle. It states that in order to improve air quality a reduction in road traffic by cutting unnecessary vehicle journeys is needed, as well as targets to reduce traffic. It states that travel plans need to be simplified and linked to environmental and health objectives and also states that road pricing would help reduce congestion and emissions as well as improve air quality. It also states that it seeks to improve access to all its Overground and Underground stations and unsure that all stations

are refurbished to meet current access standards as well as seeking an improvement in east-west bus linkages or routes in the borough.

London Borough of Wandsworth

The London Borough of Wandsworth states the importance of ensuring that existing transport networks operate as effectively and efficiently as possible and of delivering large scale infrastructure improvements, particularly on the public transport network. It stresses the need to enable transport choice by providing infrastructure, facilities and information to support all modes of transport and to ensure that adequate funds are reserved for transport projects, both pan-London and at borough level. It commends proposals to increase rail capacity on routes in south west London and potentially to deliver Crossrail 2. It welcomes proposals to deliver capacity enhancements at Clapham Junction and Balham stations and improvements to orbital rail services on London Overground via Clapham Junction. It would like more explicit support for cross-river tram services. It welcomes improvements to the Underground but would like greater clarity on which schemes have been deferred or cancelled. It stresses the importance of maintaining an affordable and efficient bus service network. It supports proposals for taxis, private hire, coaches, community transport and the Blue Ribbon Network. It supports proposals for managing the road network provided that they lead to a balanced outcome and no particular user groups are adversely affected. It opposes expansion of Heathrow and supports Airtrack. It stresses that discrepancies in the Oyster pay as you go fares need to be eliminated. It supports proposals to increase cycling mode share and establish 'Biking Boroughs' but states that the detail of individual initiatives should be decided in partnership with borough councils. It states that walking should be considered as an integral part of any transport intervention or scheme. It supports measures for improving public transport safety and urges for improvements to bus driver training. It states that improving road safety should remain a high priority and stresses that casualty hotspots should be targeted. It states that staff presence at stations and creating exemplar urban realm schemes will help to reduce crime, fear of crime and antisocial behaviour. It supports 'better streets' and improved noise impacts. It broadly supports the proposals for improving air quality and tentatively supports electric vehicles but with a caveat that there must not be too much money spent on infrastructure that will quickly become obsolete. It states that in order to improve Air Quality, modal shift must be a priority, particularly to walking and cycling and states that there is need for a climate change adaption strategy. It supports better journey planning and information but states that there is potential for new technologies alongside paper-based information. It states that Smarter Travel interventions should be well targeted. It opposes any park and ride scheme in outer London if there were to add to overcrowding on key public transport corridors. It supports road user charging as an option should congestion levels dictate that further action is required, although states that any new scheme should be based on congestion levels and be fair. It supports the removal of the Western Extension Zone provided that it will not lead to an unacceptable increase in traffic congestion and delay in Wandsworth. It states that in the absence of a road user hierarchy, more guidance on prioritising interventions is needed as areas of the strategy seem to be in conflict.

London Chamber of Commerce and Industry (LCCI)

LCCI welcomes and supports the Mayor's continued commitment to both Crossrail and the Underground upgrade and notes that consideration of future extensions would also be welcome. It is disappointed that the MTS does not contain any proposals for a strategic review of bus services, though welcomes the proposals for buses overall. It is pleased that the MTS recognises the importance of taxis and supports the measures outlined, but urges for the issue of the shortage of taxis plying for hire at night to be addressed. It welcomes proposals to make better use of the river but cautions that significant investment is needed to ensure the provision of sufficient infrastructure, capacity and connectivity. It also states that ferry services are a poor substitute for tunnels or bridges. LCCI is pleased to see that the Mayor recognises the need for additional airport capacity in the South East but is disappointed that the proposal for a third runway at Heathrow has been rejected without

any suitable alternatives provided. It welcomes the proposals to remove the Western Extension Zone and to defer Phase 3 of the Low Emission Zone but urges for a clear timetable to be provided for the former. It does not support proposals regarding road user charging.

London City Airport

London City Airport requests further information on the integration of Crossrail with London City Airport at Poplar and Custom House and calls for further development of the DLR in East London as well as longer operating hours for DLR so that its staff could use it for work journeys. It states that it does not support the safeguarding of wharves for waterborne freight as it could prejudice development opportunities and cause heavy road traffic on local roads. It does not support enhancements to the Woolwich Ferry or the potential for an additional ferry at Gallions Reach as this would contradict objectives for sustainable regeneration and would provide slow and inefficient crossings. It states support for new river crossings in east London and the proposals to encourage the development and use of quieter aircraft and to seek coordination of flight paths to minimise impact on London. It states that the MTS should be updated to expand the number of flights from London City Airport from 80,000 to 120,000 and states that the MTS should plan for accommodating these journeys to the airport.

London Civic Forum

The London Civic Forum supports the promotion of walking and cycling as travel options, improving the accessibility of the transport system for all, recognition of the potential for the Blue Ribbon Network for both leisure and freight, opposition to Heathrow expansion, 'better streets' principles, the notion of the whole journey approach to transport planning, the integration of transport and land use planning, reducing the need to travel, improving transport connectivity, improving the public realm, supporting regeneration and tackling deprivation and would like to see these elements strengthened in the strategy. It supports Crossrail, Tube modernisation, the modernisation and expansion of London Overground to form an orbital rail service and the expansion of the DLR. It states that the strategy should develop specific proposals for planning the expansion of the public transport network after the completion of the current TfL investment programme. It opposes the deferment of the step-free programme and supports the exploration of new possible revenue sources such as road user charging and parking levies to fund the programme. It states that any work on 'better streets' should be done in conjunction with local communities and disability groups in order to ensure their safety. It states that there needs to be better and more consistent eligibility criteria for the Dial-a-Ride service. It welcomes work to encourage walking and cycling but is concerned that targets are not ambitious enough. It supports changing travel behaviour to encourage use of more sustainable modes but states that this is countered by proposals which will result in increased traffic. It states that lower speed limits should be introduced to encourage walking and cycling, reduce short car journeys and increase road safety. It states that a number of policies and proposals aimed to meet the challenges of climate change and poor air quality will not have sufficient impact. It states that the strategy does not have clear policies, proposals and goals aimed at reduction in car traffic levels. It is concerned that methods to smooth traffic flow will counteract many of strategy's aims for reducing carbon emissions and improving air quality. It supports reducing road space and allocating it in favour of sustainable modes. It opposes the removal of the Western Extension Zone.

London Civic Forum and Youth Campaign for Better Transport

The London Civic Forum and Youth Campaign for Better Transport welcomes the MTS and is keen to ensure that young people's views are heard. It would like to see the Mayor extend eligibility for 18+ concessions to all young people between the ages of 18 and 24, not just those currently in full or part-time education. It is pleased to see commitment to promoting clean public spaces and better streets but also stresses the importance of ensuring that public transport remains clean and that any waste

collected is recycled appropriately. It welcomes the emphasis on the importance of reducing crime and anti-social behaviour and is keen to ensure that this is addressed fairly, and in a way which doesn't discriminate against young people. In addition it would like to see an increase in the number of staff available at stations at night, improved communication regarding night services using 'youth-friendly' technology, improved lighting at stations and increased night services. It is pleased to see the Mayor's commitment to tackling climate change but urges for the Mayor to prioritise spending on the advancement of 'green' technologies in order for all London's buses to exceed EU targets for emissions. It opposes the proposed removal of the Western Extension Zone and calls for further public consultation on this.

London Councils

London Councils welcomes many aspects of the MTS, including the Implementation Plan; the commitment to walking and cycling and an increased mode share for these and public transport; proposals to reduce carbon emissions and improve interchange and integration; and the opposition to Heathrow expansion. It also supports the intention to improve connectivity into existing town centres; and it is pleased that the requirements for LIPs will be kept to a minimum and that the Mayor will seek greater influence over National Rail. It highlights a number of areas where it would like to see changes made to the MTS. These include better integration of the MTS with the EDS and London Plan, so that, for example, priority areas for investment can be identified; it would also like to see more integration of these strategies with non-London strategies. It would like the MTS to set out how local and long-distance services will be balanced, and more clarity about what is achievable in the timetable given (for example, a date for review of the Chelsea-Hackney line). London Councils continues to call for an explicit road user hierarchy and, while it welcomes the measures for cycling and walking, would like more emphasis on target-setting and the achievement of this shift. Similarly it supports the polycentric approach but firstly is concerned that there is little said about radial links into central London (which remain important) and secondly, that much of the approach for outer London depends on improved information and integration rather than on new infrastructure or services. Related to this, it would like to see a full review of bus routes and services, including noise impacts and ticketing flexibility, and would like to be involved in this. London Councils states that the Mayor should make his position on further road user charging clear, particularly in the light of boroughs' powers to implement this. It states that there needs to be interim targets for CO₂ reduction, and specific targets for bus and taxi emissions; and a statement on the contingency plan if the EU refuses the request for an extension for achieving NO₂ and PM₁₀ targets. It advocates the development of a low emission taxi but, in regard to incentivising other low emission vehicles, states that parking charges must be decided by individual boroughs. It is concerned about the affordability of public transport, particularly with regard to bus fares, and recommends the introduction of concessionary travel for apprentices. Finally, London Councils calls for increased Mayoral control over National Rail services, including franchise specification, and states its concern that there are requirements for boroughs in the MTS (for example, electric vehicle parking, road works permits) that have not been funded.

London Cycling Campaign (LCC)

LCC states that the pace of change for the implementation of cycle-friendly policies need to be increased and states that creating the right conditions for cyclists will address environmental, health and congestion issues. For this reason it believes that there should be a preference for reallocating street space to walking, cycling and public transport. It is concerned that any planned pedestrian crossing time proposals would be detrimental to pedestrians. It states that the MTS does not fully engage with managing demand across the modes of transport and that the targets for cycling in the MTS should be reviewed with interim targets set, and a long-term goal of 20 per cent modal share of trips under five miles. LCC states that cycle journeys should be counted to demonstrate the extent of cycling and that greater emphasis should be given to improving off-peak on-train cycle carriage

provision. It states that there should be a commitment to the Road Danger Reduction Charter and a commitment to funding Borough public realm design guidance. LCC states that planning requirements and incentives to the employer must be included in the MTS to facilitate workplace and educational establishments' cycling facilities and states the MTS should set sub-targets for increasing cycling among particular target groups as well as targets for private motor traffic reduction. LCC states that 20mph speed limits are required on all residential streets; river crossings should support active travel; and Biking Boroughs should be encouraged with the provision of dedicated funding and central coordination.

London Development Agency (LDA)

LDA is satisfied, with the policy levers outlined in the draft Strategy. It states that the strategy should make a stronger proposition to support Opportunity Areas through the spatial investment offer of the LDA. It would welcome a reference to the LDA Crossrail Regeneration Benefits and Investment Plan within the strategy. It suggests that, in order to support the outer London economy, thought needs to be given to the local variety, distinctiveness and capability of places. It states that outer London often has more in common with the Outer Metropolitan Area and that there is a need to address the many key transport issues of common concern on both sides of the Greater London boundary, including congestion and strategic transport routes.

London Disability Cycling Forum

The London Disability Cycling Forum states that more provision needs to be made for cycling equipment used by disabled cyclists, not only on the road but also in development sites and at public transport locations. It would like more emphasis on accessibility issues for disabled cyclists and the inclusion of a wide range of cycles in cycle schemes, as well as the inclusion of trikes in the London Cycle Hire Scheme.

London First

London First welcomes the following in the MTS: the planned increases in capacity; the need for additional airport capacity and river crossings; the intention to develop demand management measures; and the upgrade of Overground rail. It would also like to see a proposal to develop new funding mechanisms to get projects started, noting the current constraints on revenue; and lists further actions which are needed to reduce congestion; it also states that there is more scope to develop real-time information for transport users. With regard to aviation capacity, it does not support the Mayor's position on Heathrow and also calls for a heliport in east London. On the proposal to remove the Western Extension, it prefers that it is suspended for six months, so that an evaluation of the impacts and complementary measures can be made, with a further option to reinstate with reduced operational hours in future. It supports road user charging to reduce congestion and pollution on the most affected roads during peak periods and would like details on how schemes will be developed with stakeholders.

London Forum of Amenity and Civic Societies

The London Forum of Amenity and Civic Societies identified four developments which must shape the MTS: meeting CO₂ reduction targets; improving air quality; greater use of demand management; and recognition of growing financial constraints. It opposes the proposal to defer implementation of Phase 3 of the Low Emission Zone; it supports the development of road user charging for economic and environmental aims and opposes the proposed removal of the Western Extension. It supports proposals to develop outer London based on a 'hub-and-spoke' approach, the promotion of walkable neighbourhoods, an improved public realm and step-free access. It states concern that the strategy relies too much on the need to travel especially by car for long distances. It supports break-bulk or

consolidation centres as well as the concept of a 'London lorry' and more rail freight terminals. It states that the current reduction in current bus transport capacity is unacceptable but supports access improvements to town centres, higher capacity orbital railway, changing travel behaviour and encouraging the use of more sustainable modes. It also states that there should be better coordination between rail and Underground networks with regard to closures for maintenance, supports the program of station refurbishment, but is concerned that there is insufficient commitment to improving transport interchanges. It states further concern over smoothing traffic flow if this advantages vehicular traffic at the expense of pedestrians. It supports maximising use of the Blue Ribbon Network for passengers and freight as well as support for enhancing information provision and making traffic lights more pedestrian friendly. It supports proposals to encourage cycling and states that the same priority should be given to walking. It welcomes measures to: improve road safety, reduce noise impacts, provide better walking routes, encourage the use of Delivery Service Plans and encourage more carbon efficient travel behaviour. Finally it hopes that there will be further work to integrate the MTS and the draft London Plan, particularly with regard to identifying preferred locations for high trip-generating uses, for consolidation and break-bulk centres and aligning new public transport provision with new development areas.

London Gatwick Airport

London Gatwick Airport states that good rail links between the airport and central London are vital and supports the objective of improving accessibility to central London as well as stating that improved connectivity to Gatwick from south London should be considered as part of the corridor approach. It is disappointed that the MTS does not promote improved rail connectivity between key south London locations and West London line to Gatwick

London Liberal Democrats (The London Assembly Liberal Democrat group and Liberal Democrat London spokesperson Tom Brake MP)

The London Liberal Democrats states that there are contradictions in the MTS and that it lacks interim measures of success, and in particular lacks detail on the Mayor's priorities for schemes in a difficult financial climate. It is concerned about the funding for the Tube upgrade and questions whether there is funding for the potential Northern and Bakerloo line extensions, although it welcomes these in principle. It is critical of bus fare increases and plans to reduce bus services, stating that this is unfair for passengers with lower incomes and calls for changes to bus contracts so that there is an incentive for bus companies to carry more passengers. It urges the inclusion of policies to help reduce the need to travel, including joining-up spatial and transport planning so that, for example, people live closer to key services. It welcomes proposals to encourage walking and advocates the pedestrianisation of Oxford Street; it also supports cycling proposals but also states that there needs to be more effective enforcement of legislation in regard to cycling. It notes that even with capacity increases on public transport, there is still a 14 per cent increase in road congestion forecast by 2031 and urges TfL to investigate road-pricing schemes, accompanied by a further roll-out of Smarter Travel schemes. London Liberal Democrats are concerned about air quality and would like to see a proposal for an inner London Low Emission Zone; there should also be more done on bus fleet emissions and enhanced electric vehicle charging infrastructure. It would like priority given to step-free access, a review of Dial-a-Ride and for the Mayor to have direct oversight of all regional rail routes in the London area.

London Primary Care Trusts

London Primary Care Trusts states that the hard evidence on the health effects of transport is not made clear or qualified in the strategy. It states that the health impacts of the decision to defer Phase 3 of the Low Emission Zone are not quantified and that it is not clear that progress in reducing poor air quality at the worst sites is adequate or will be maintained. It welcomes the acknowledgement of the

annoyance factor of noise and its effects on mental health but notes that these effects are not mapped or quantified in order to judge how unacceptable or damaging noise levels are. It notes that the downside of more cycling may be more casualties and states that the NHS may wish to be involved in local policy and implementation to avoid these burdens on services and to maximise the benefits through safe physical activity. It is unsure to what extent the overall road safety policy will lead to real and substantive progress on the ground. It suggests that a strategic review of accessibility to health services may be warranted. It states that it is unclear how the aim of prioritising transport improvements in regeneration areas will be effectively delivered. It is disappointed that despite the repeated reference to health and the assertion that the monitoring will be outcome-based, the monitoring indicators do not include specific health indicators.

London Sustainable Development Commission (LSDC)

LSDC welcomes the commitment to CO₂ reduction targets and making improvements to air quality; it also welcomes the approach taken to the Integrated Impact Assessment of the MTS. It would like greater emphasis on reducing the need to travel and on improving access to services rather than access to transport itself. It would like more policies on raising money for public transport improvements and guidance for supporting communities to choose lower carbon transport options, and while it welcomes electric vehicles, notes the need to reduce emissions overall. The Commission would like the Mayor to state how air quality targets will be met; a clearer direction on addressing road accidents and more on how TfL policies will help the most vulnerable. It also calls on TfL to accelerate the take-up of sustainable technologies, for example by using its procurement programme. It notes that there will need to be closer examination of any airport expansion plans.

London Thames Gateway Development Corporation

London Thames Gateway Development Corporation states that the MTS could say more about how specific proposals will be funded and delivered, in order to help delivery agencies fulfil their targets for housing and employment. While it supports the principle of integrating transport and land use planning, regeneration areas may need improvements to capacity beyond public transport and demand management, for example via additional highway capacity. It welcomes the inclusion of the following schemes: Barking station, Dagenham Dock DLR extension (but would like more detail on future extensions), and the commitment to High Speed Rail, and advocates Stratford as a suitable interchange for High Speed 1 and 2. It notes a number of apparent discrepancies between the MTS and the London Plan, for example the former does not mention Beam Park station. It strongly supports a new river crossing and is keen to see more details about the review being undertaken and potential timescales for a project; it would also like more information on the Blackwall Tunnel refurbishment and how this fits in with the current A12 study; and also calls for TfL to state its views on the possible Thames Estuary Airport.

London TravelWatch

London TravelWatch identifies a number of priorities for transport in the short term, particularly with regard to securing further bus priority measures across the range of borough and authority boundaries, an extension of the network and its operating hours, and timely delivery of the bus stop accessibility programme. It calls for further work to be done on the costs and benefits of further road user charging so that it can be better understood; progression of the Better Streets initiative and delivery of both the Underground PPP and the National Rail HLOS projects. It is keen that more efficient, mass transit modes like buses are given more road space and priority and is wary about reallocation of road space for uses including loading and motorcycles and PHVs in bus lanes. It welcomes the promotion of walking and cycling, measures to improve safety and security and advocates much greater use of Smarter Travel and the adoption of travel plans in hospitals, schools and workplaces. While it is positive about smoothing traffic flow and Smarter Travel, it states that

there is a need to 'lock in' the benefits through the use of complementary measures, otherwise there is a danger that there will just be increased demand for this released road space. It would like greater value given to health-related trips, for example a consideration of how bus stops can be moved closer to hospitals. London TravelWatch welcomes the proposals for new infrastructure such as Crossrail 2, increases to capacity on National Rail and further DLR extensions but calls for more detail on how these will be funded; it also would like to see further proposals for tram schemes. It also states that there must be targets and monitoring for key objectives such as reducing congestion and crowding. Finally, it sets out a number of specific improvements on the rail network that it would like to see, and a list of locations on the road network where it would like the Mayor to explore options for reducing peak time delays.

London Visual Impairment Forum

The London Visual Impairment Forum is concerned that the rephrasing of traffic signals may result in blind and partially sighted people having less time to cross the road, and notes that safety must be a factor in the design of streetscape and shared spaces. It stated that attention should be given to the design of streets so that buses are able to pull up to stops and deploy the wheelchair ramp effectively. It expresses concern over cycle greenways where they include shared use, any curtailment of step-free access and any reduction in concessionary fares. It supports the introduction of Countdown 2, effective pavement maintenance and the commitment to work with utility companies to reduce road congestion. It states that taxi and private hire drivers and Dial-a-Ride staff should have adequate disability equality training; and that cycle training should include disability awareness. It welcomes measures to improve signage including Legible London, the introduction of ISA technology to limit the speed of vehicles and the introduction of 20mph speed limits however it does not support allowing cyclists to cycle both ways down one way streets.

National Express East Anglia and c2c

National Express East Anglia and c2c welcome the MTS and fully supports the aspiration to achieve a transport system 'which can excel among those of world cities'. It agrees with the desire outlined in the MTS to achieve improvements in key areas such as station interchange, orbital journeys, better station facilities, enhanced pedestrian and cycle access to stations, and other modal improvements which would complement rail transport and share the ATOC view that there should be a greater focus in the strategy on tackling capacity constraints, enhanced light rail and bus links with National Rail services, better accessibility and additional prioritisation of schemes (to help direct investment according to the funding environment - especially if, as seems likely, funding is constrained). It reiterates the importance of both extra capacity and new trains on the West Anglia route and considers that 'four tracking' of the Lea Valley is essential but consider there is also a vital need for major upgrade to infrastructure and services on the Great Eastern Main Line with faster journey times, new trains (especially on the intercity services to Norwich) and increased capacity and line speed, and the need to compliment Crossrail. It also considers that priority should be accorded to the crucial multi-modal interchanges at Liverpool Street, Stratford, Walthamstow Central, Tottenham Hale and Seven Sisters, where the flows are substantial, growing and beyond the levels they were originally expected to easily accommodate and that more work is required on ticket inter-availability and information provision. Finally, collaborative working between the train operating companies, British Transport Police and TfL on safety and security should be a priority.

National Joint Utilities Group (NJUG)

NJUG welcomes the Mayor's emphasis on securing a reliable road network and supports initiatives to minimise disruption from unplanned events, use intelligent traffic control and develop a workable Permit scheme for roadworks. However, it states that new initiatives such as lane rental and permit schemes need to be properly trialled and evaluated in terms of their benefits to road users and their

cost to utility companies and consumers. It notes that there are already a number of regulations in place to manage the impact of street works, and some of these are relatively new, including overstay charges, Fixed Penalty Notices and permit schemes applied by local authorities. It urges that these be properly evaluated to ascertain whether further measures would add benefits. NJUG notes that it has, at the Mayor's request, been implementing the Clearway 2012 project to minimise disruption during the 2012 Games and that, generally, utilities only ever excavate roads for essential reasons of safety, security of supply, connection / upgrade or to divert apparatus for major transport or regeneration projects. It welcomes TfL's commitment to coordinate roadworks but states that TfL and all the boroughs should also upload their planned works to the database and that there is more scope to organise 'workathons' when different agencies undertake work simultaneously to minimise disruption. Finally, NJUG questions whether utility works are responsible for significant levels of congestion, citing research that only 10 per cent of congestion is caused by road works, half of which are undertaken by local authorities.

Natural England

Natural England welcomes the prominence given to walking and cycling, as these modes of active travel have major health benefits, as does access to green space. Therefore it welcomes plans to plant trees, improve the street scene and create safe walking routes in London. However, it would like parks to be included in these walking routes and notes that these could also bring biodiversity benefits.

Network Rail

Network Rail supports the Mayor's goals as set out in the MTS, and welcomes its status as a key delivery partner for the proposals in the document, noting the central importance of the passenger and freight railway in supporting economic growth in the Capital. It welcomes the integration of the three Mayoral strategies, particularly for ensuring that development makes use of existing and planned transport links. It also calls on the Mayor to invest revenue from the planning system and road charging to improve London's railway. Network Rail notes that it is working with TfL on the London and South East Route Utilisation Strategy (RUS) and states that this should be referred to in the MTS. It welcomes Mayoral involvement in planning National Rail services and standards and calls for the Mayor to be a champion of the case for sustained investment in rail infrastructure in London.

NHS Lambeth

NHS Lambeth states that resources should be invested in areas of economic deprivation to encourage use of public transport by those from more disadvantaged groups and states TfL should engage with stakeholders to facilitate access to new health developments. It states that there should be improved signage from stations and bus stops as well as more information on maps to help people find their way to public services, and also states there should also be a specific option on journey planner for routes to public services. It calls for preventive measures to minimise the potential risks associated with increased cycling.

NHS London

NHS London is broadly supportive of the MTS and welcomes the emphasis on different organisations within London working together. It makes a number of suggestions for further additions and clarifications: greater embedding of health and health inequalities, including the monitoring of these, within the MTS and a modification so that Journey Planner should make walking its first recommendation for trips, which would help NHS and TfL to promote this mode and its attendant health benefits. It is disappointed that the removal of the Western Extension is proposed, given the high air pollution levels in London and the high levels of respiratory disease. It notes that while there has been good progress in improving communication between public services and TfL, the process of

reconfiguring transport remains slow. Finally it states that the principle of working in partnership could be expanded to include, for example, co-funding of developments such as lifts and signage.

NHS Tower Hamlets

NHS Tower Hamlets PCT broadly welcomes the MTS and commends the Mayor's office for the vision and ambition of the document. It applauds the prominence given to the further development of promoting active healthy travel and notes that the strategy moves a considerable way towards addressing the interlinked issues of travel, climate change and public health. However, it states that an opportunity has been missed to support NHS policy since it has a major role with regard to carbon reduction, given the size and travel patterns of its work force and the volume of its procurement activity. It notes that the focus within the strategy upon road safety and work-related road safety is to be applauded but states that it is not clear to what extent the overall policy will lead to real and substantive reductions in accidents on the ground. It regrets that it is proposed that Phase 3 of the Low Emission Zone be deferred, given the acknowledgement in the strategy that London's overall air quality remains the poorest of any region in the UK, with transport emissions as a major contributory factor.

North London Strategic Alliance

NLSA acknowledges the progress that has been made in improving London's transport network and welcomes the level of investment in TfL's Business Plan. It is pleased with TfL's work on sub-regional transport analysis and welcomes many of the policies and projects outlined in the MTS. It considers that, while these improvements will go some of the way towards meeting the challenges facing North London, additional measures are essential in the longer term if the sub-region is to play its full role in supporting growth of London as a world class city. It is concerned that: funding is concentrated on Crossrail and the Underground upgrades with little provision for the development and implementation of other medium and large scale schemes; by 2025 the additional capacity from the PPP improvements will not be enough to mitigate congestion on the Victoria, Piccadilly and Northern lines; the suitability of the existing bus network and the range of services on offer and that there are not enough specific plans to address ongoing congestion on key arterial road routes, including the North Circular Road. It states that, if adequate airport capacity is to be provided in the longer term, then growth at Luton and Stansted could play an important part in the renewal of two corridors of coordination and growth. NLSA supports the Chelsea-Hackney line as a strategic rail link between South-West and North London, providing new capacity and congestion relief, particularly on the Victoria line and the identification and promotion of a viable proposal securing maximum benefits for North London should remain a priority. It considers work is needed to continue to relieve existing crowding on the Northern and Piccadilly lines, including interchange improvements at Camden Town station, and to maximise the benefit of the Thameslink Programme for North London and the wider London-Luton Growth Corridor including ensuring that inner suburban services are enhanced and improving key stations at Mill Hill Broadway and Cricklewood and the interchange at West Hampstead to cope with growth. It considers that increased capacity is required on the West Anglia routes to mitigate over-crowding and support sustainable growth along the London-Stansted-Cambridge-Peterborough corridor and at Stansted, and welcomes TfL's support for four-tracking, and considers that enhanced Stratford services, including to Chingford, should be long-term priorities. It considers that longer trains and full electrification of the North London and Gospel Oak to Barking lines are required to support growth and upgrades to the Gospel Oak to Barking and Felixstowe to Nuneaton lines are required to encourage the sustainable distribution of freight. It considers that a top priority is for a review of the bus network to tackle issues including poor orbital links, and suggests that solutions for North London could include bus-based transit schemes. Finally, it considers that bespoke packages of investment to deal with congestion are required to reduce delays, achieve a mix of priorities for different road-users and achieve an environmental balance.

North West London Hospitals NHS Trust

The North West London Hospitals NHS Trust is concerned that transport services, particularly bus services do not adequately serve London's hospitals and that the consultation process to consider such requests are inadequate. It suggests specific bus route changes and would like to see the Countdown 2 project be provided as a real time system located in the cafe / lounge areas of hospitals and expanded to include Underground and Overground information. It suggests Northwick Park station should be a priority for step-free access and states that provision of secure cycle parking is a high priority. It states that the Cycle Superhighways concept should be extended to popular cycle routes in outer London.

Olympic Delivery Authority (ODA)

The ODA welcomes the following in the MTS: the commitment to Crossrail; the 60 per cent target for a reduction in CO₂ emissions; the commitment to having London 2012 Olympic and Paralympic Games transport infrastructure in place for the Games; and the proposal for international services to stop at Stratford. While it welcomes the proposed DLR extension from Stratford it would like to be consulted on the detail. The ODA supports initiatives to increase walking and cycling and would like to see reference made to the 'Chingford Link Project' in the MTS. Finally, it states that the approach of raising developer contributions for Crossrail should be balanced with the need to fund the delivery of local schemes in key regeneration areas, and these may need to take precedence over Crossrail.

Park Royal Partnership (PRP)

PRP states that, as a major stakeholder in the economic prosperity of west London, it should have a direct and funded role in helping to develop and implement the strategy's policies. PRP suggests that TfL operating departments should be set targets to increase mode share by making public transport services, including park and ride schemes, more attractive to motorists. It encourages low emission and electric vehicles, as well as the reduction of the number of commuters accessing Park Royal by car but states that Park Royal's urban realm and security around public transport must be improved in order to encourage modal shift. PRP seeks to reduce congestion by encouraging parking at integrated transport hubs. It welcomes the continuing attention to smarter travel in the strategy and states that the restoration of PRP's smarter travel funding is necessary. It notes that the establishment of a freight forum will improve the efficiency of freight distribution, and would like to see more use of the Grand Union canal, where viable, to distribute freight. It also suggests that Network Rail should be encouraged to improve utilisation of some of the major rail freight facilities in London. In order to further improve accessibility, PRP wishes to see real time running information at all bus stops in the Park Royal area, better signposting and easier access to tickets. It welcomes the policy to support regeneration in Opportunity areas and seeks the transport investment necessary to deliver it in Park Royal. It states that the removal of the articulated bus is unnecessary and that significant re-design of the bus service is required in order to provide a better orbital bus service. Additionally it requires an explanation within the strategy of what the 'development of the bus network' will involve. It wishes to see information on the Mayor's manifesto commitment to introduce a network of express bus services linking rail stations in outer London, and would like this to include Fastbus. It states that the potential for enlarging North Acton station ticket hall and providing step-free access to its platforms as well as construction of the proposed First Central interchange should be investigated. Additionally it states that there is a need for rail interchange between the west / north London lines and Crossrail.

Parliamentary Advisory Council for Transport Safety

The Parliamentary Advisory Council for Transport Safety states its support for the introduction of voluntary Intelligent Speed Adaptation due to safety improvements and also supports proposals to improve cycle safety in the vicinity of HGVs. It also states that there may be interesting cross-modal

approaches which can be taken to risk manage London's rail networks more effectively. It states that the Mayor should not only commit to reducing casualties and injury but also to encourage all agencies to work together and narrow any data 'gap' between them as well as encourage the GLA and TfL to implement driving-for-work policies.

Port of London Authority

The Port of London Authority is pleased to see that the movement of people and goods by river has been comprehensively integrated into the MTS and suggests some further clarifications and additions to the proposals and policies relating to this. Firstly it asks for consistency of terms when the Thames, Blue Ribbon Network and other waterways are referenced, and a full inclusion of river transport in the definition of public transport. It states that the MTS should include the Port of London in addition to the other ports listed in the draft. It supports proposals to seek financial support for new piers, retain safeguarded wharves and the identification of further wharves. It notes that there must be early consultation on any future river crossings.

Private Hire Board

The Private Hire Board states that private hire vehicles should be able to use bus lanes, noting that lifting the restrictions may help improve air quality through reduced engine idling. It states that any shortages in official Olympic transport provision could be met by private hire vehicles.

RAC Foundation

The RAC Foundation states that the approach of the MTS to maintaining an efficient road network is unrealistic in the context of growth, competing demands for road space, road space reallocation and constrained funding. It states that the MTS appears to deal with rail congestion but not increasing road congestion as well as stating the MTS lacks a clear indication of priorities and only refers to funding in general terms. It states initiatives such as cycling and walking are welcome but will not entirely solve the problems of congestion as well as stating that dealing with road congestion is important as it affects prosperity, competitiveness and bus performance. While it supports smoothing traffic flow it states that there is no evidence to suggest that this approach will make more than a small difference to the problem of deteriorating road network performance. It states that differential pricing could be used to control future demand for road space and states that firm proposals are needed for demand management. It states the MTS should include the importance of the road network, car travel, road freight and identification of 'quick win' junction improvements as well as a strategic assessment of road space requirements linked to a pricing mechanism. It states that the MTS's focus on accessible transport should not only be on public transport, but also include car travel. It states it is hard to see how commitments on carbon reduction and reducing congestion can be met without road user charging, and advocates a 'second generation' scheme possibly covering a much wider area of London than the current scheme. It states that roads should be widened where possible, that there is a need for another river crossing and bus lanes should be re appraised periodically to ensure they are working correctly. In particular, it calls for a better recognition of the importance of the car in outer London; and notes that virtually all freight and services to and within London is done by road. Finally, it would like to see clearer prioritisation of the Mayor's schemes and proposals and a better indication of where funding will be focused.

Railfuture

Railfuture states that more frequent trains, better service reliability, to both inner and outer London and the quality and cleanliness of rail services are important. It states that improving and redesigning stations will help to improve capacity, access and passenger flow and states its support for demand management and disagreement with the proposed removal of the Western Extension Zone. It states

that secure parking is important at stations and there should be further promotion of the transfer of road freight to rail, including the provision of freight transfer depots.

Ramblers

The Ramblers notes that praise is undoubtedly due for the enlightened approach of several proposals in the MTS but it is not certain that the proposals will go so far as to create a demand for walking across London and raise the pedestrian in the highway hierarchy. It feels that the strategy should further promote walking through the expedients of social inclusion and targeting. It is delighted that there is a commitment to roll out Legible London in other areas but would like to see a greater commitment to better integrate it with other modes. It is pleased to note the strategy's proposals for promoting physically active modes of transport but feels there needs to be better communication and coordination between the various agencies delivering such projects. It praises the proposals regarding better policing and designing out crime but stresses that measures to reduce crime should interfere as little as possible with a citizen's freedom to move around unimpeded. It welcomes proposals for safety improvements and promoting balanced streets but feels that while road safety campaigns for young people are essential, they must not deter them from walking. It suggests that cycling should be encouraged provided that work done to improve routes for cyclists does not make those routes less attractive and safe for walkers.

Richard Tracey - London Assembly Conservative Group

The Conservative Group in the London Assembly states that the MTS is an excellent document. It states that both the Tube upgrades and construction of Crossrail will be of great benefit to London as a whole but notes that these will not be of direct benefit to South London. It would like to see a clear breakdown of the costs of desirable projects as well as more clarity over the order of priority of such projects. While it understands that a number of excellent schemes are currently unaffordable, it suggests that the MTS should make clear that specific improvements to South London's transport are at the very top of the Mayor's future priorities as soon as funding becomes available. It suggests that there is further scope for the strategy to consider bringing back into use unused or little used railway lines, particularly in South London. It does not support the option of road user charging. It notes that when discussing forecast increases in public transport trips and road congestion the strategy does not take into account the extent to which measures such as flexible working and working from home will help to reduce demand.

Road Haulage Association (RHA)

The RHA endorses many of the aims and aspirations of the MTS. It welcomes the efforts already underway to adopt more business-friendly enforcement of traffic regulations on TfL roads and the commitment to take this approach to boroughs it considers have been unreasonably using fixed penalty notices. It supports the encouragement of cycling in London and offers support in highlighting the dangers and responsibilities involved to both cyclists and truck drivers. It agrees with promotion of alternatively-fuelled freight vehicles, is keen to seek reasonable incentives for operators, and encourages the publication of testing of the technology so that operators and financial institutions fully understand the operational and cost risks involved. It highlights the efforts that the industry and its suppliers have made over the past three decades to innovate, to improve efficiency and to reduce the environmental impact of freight. While it supports TfL's continued commitment to Delivery Service Plans, Construction Logistics Plans, the freight portal, and the overall aim of FORS, it does not agree with the segmentation of the freight industry under FORS. It recognises the challenges posed by NO_x levels but is concerned about the benefit / cost of imposing a NO_x requirement in 2015 on trucks that do little mileage in London and the impact on small businesses.

Roadpeace

Roadpeace supports proposals to encourage cycling but states that the Mayor should encourage TfL, council and justice sector staff to cycle in order to encourage public uptake. It states that campaigns promoting compliance among cyclists should include other road users, that there should be a wider implementation of cycle superhighways and that in addition to making the Highway Code more cyclist friendly, there should be reform of the civil compensation system. It supports proposals to promote walking but states that it is necessary to adopt a sustainable road user hierarchy with pedestrians at the top. It states that the road casualty reduction targets are disappointing and that greater publicity should be given to the number of road casualties and the location of collision hotspots. It stresses the need for a Road Danger Reduction Plan and supports the continued investment in road safety research publications. It supports proposals for HGV and freight safety but stresses that even more needs to be done in these areas. It states that 20mph default speed limits should be implemented in London. It suggests that tackling crime and fear of crime should also include motoring offences and that all police consultations should include motoring offences. It welcomes proposals for designing out crime and states that a key priority should be designing out blind spots on Lorries and promoting mandatory Intelligent Speed Adaptation. It welcomes proposals for smarter travel and supports the wider use of safety cameras and Automatic Number Plate Recognition systems. It states that aspirations for modal shift should be higher but raises concerns that electric vehicles would eliminate the warning of oncoming vehicles provided by engine noise. It states that support for biofuels should be qualified. It suggests that intermediate targets should be defined for the development and uptake of CO₂ efficient road vehicles and to secure modal shift and that failure to meet these targets should trigger the use of stronger incentivisation.

Royal Borough of Kensington & Chelsea (RBKC)

The Royal Borough of Kensington & Chelsea states that the MTS must aim to manage the consequences of population growth without compromising sustainability. It believes that the delivery of Crossrail by 2017 should be the main priority but is disappointed that there is no proposal to turn the provision of a turnback facility into a working station. It supports the development of a national high-speed rail network and welcomes the inclusion of the Chelsea-Hackney line in the strategy. It strongly supports improvements to orbital rail capacity and interchange but stresses that interchange stations should be accessible to all and that direct links provided by existing orbital rail travel should be preserved. It would like to see the removal of the capacity constraints at Clapham Junction station and further integration in the timetabling of Southern train and London Overground train services on the West London line. It supports the proposals to relieve London of freight without an origin or destination in the Capital. It supports the planned upgrade of the Underground service. It is disappointed that there is no commitment in the strategy to carry out a large area-wide review of the bus network, such as on a sub-regional basis, or a review of London's taxi provision. It welcomes the proposed measures to smooth traffic flows and supports investment in intelligent traffic control systems. It opposes capacity increases at Heathrow and supports proposals to improve public transport access to London's airports but stresses the need for the West London line services to Gatwick to be reinstated. It supports initiatives to create a more accessible transport system. It supports efforts to make the road network more permeable for cyclists, increase provision of cycle parking and training and introduce the Cycle Hire Scheme but is sceptical about the benefits of Cycle Superhighways. It would like to see a greater focus on the implementation of smarter travel initiatives. It notes the importance of balancing improved information provision and the reduction of street clutter. It welcomes efforts to improve road safety, especially with regard to technology and side-guard protection on HGVs. It suggests a programme of education and enforcement to promote road safety and considerate behaviour towards other modes. It supports the Mayor's Share the Road Campaign and believes that this should be included explicitly within the strategy. It supports proposals to reduce crime, fear of crime and anti-social behaviour. It commends the principles of 'better streets'. It strongly supports the provision of noise reduction measures but suggests that more can be done to tackle

vehicle noise. It supports the principle of Low Emission Zones but notes that the current zone has not delivered large benefits in air quality. It states that the strategy should go further to address air quality issues, including taking a more proactive role in addressing the problem and setting explicit targets for reducing bus and taxi emissions. It supports proposals for car clubs, promoting behavioural change and the development and use of hybrid vehicles but has reservations about encouraging electric vehicles. It welcomes the introduction of Oyster pay as you go on Thames Clipper and National Rail services in London and supports the rationalisation of TfL and National Rail fares. It does not support consistent parking and loading regulations across London. It states that there may be a case for road pricing across London but stresses that any scheme would need to take into account local conditions and have fair and flexible charges. It states that the Western Extension Zone is inflexible and that if the proposals to remove the zone go ahead, the Mayor should ensure that traffic levels do not return to their pre-Western Extension levels.

Royal Borough of Kingston upon Thames

The Royal Borough of Kingston upon Thames states that there needs to be a stronger link between the MTS policies and proposals. It states that despite metropolitan town centres being identified as key growth areas, the proposals do not prioritise them or provide certainty that the transport infrastructure will be delivered to support these areas as growth nodes. It opposes the Mayor's intentions to continue to increase bus fares and reduce the total kilometres of the bus network. It is concerned that appropriate funding has not been provided for the implementation of the new proposals and initiatives for the boroughs set out in the MTS. It states that proposals throughout the strategy do not provide confidence that reducing the high mode share of private motor vehicle use in outer London is a priority for the Mayor. It states that transport infrastructure in south London is not supported in a way that would allow all parts of London to contribute to economic growth and that focusing investment in transport infrastructure and economic growth in central London is contrary to the aim of creating a low carbon economy. It is concerned that the measures outlined in the strategy fail to achieve the Mayor's own CO₂ reduction targets for London and states that reducing CO₂ emissions should be a priority for the MTS. It states that the strategy needs to set interim targets to assess the Mayor's performance and track the progress towards the strategy's 2025 and 2031 targets. It calls for greater consideration of transportation links to key population centres outside London. It suggests that Travelcard rezoning of metropolitan town centres should be considered as a means to reduce travel costs and promote the economic development of these areas. It requests that Kingston and Surbiton stations be reclassified to Zone 4. It calls for strong consideration to be given to increasing train frequencies, and improving the connectivity of the rail network in southwest London as key means of increasing capacity; as opposed to just considering longer trains. It supports the increased emphasis on Smarter Travel initiatives and the promotion of walking and cycling. It requests that Cycle Superhighways are expanded further into outer London and that orbital highways are considered and calls for a commitment to installing cycle storage on trains. It supports road user charging and demand management but stresses the need to ensure that such measures do not provide incentives for modal shift away from public transport, walking and cycling and would prefer to see incentives for using electric vehicles rather than penalising motorists. It has concerns regarding the Mayor's proposal to remove the Western Extension of the Congestion Charging Zone and opposes the deferment of Phase 3 of the Low Emission Zone.

Royal Free Hampstead NHS Trust

The Royal Free Hampstead NHS Trust states its support for air conditioning on the Underground and would like the programme extended to the Northern line; for capacity increases on the London Overground; upgrades to the Northern line; and 'Making Walking Count'. It also states the targets to improve cycle parking at stations could be achieved in one year rather than the proposed two.

Royal National Institute for Deaf people (RNID)

RNID states that it welcomes plans to make transport more accessible for people with hearing impairments and wants the same accessibility standards across all public transport networks. It also welcomes plans to improve staff training and would like to see commitments to improve public address systems and improve taxi drivers' awareness in relation to people who are deaf. RNID states that it wants more information available in a variety of formats that people with hearing impairments can use. It states concern over shared spaces but welcomes the fact that the MTS states that it will take into account disabled and deaf peoples needs, and notes that it has previously raised concerns on this issue. It also states that the needs of disabled people need to be taken into account when encouraging walking and cycling. It states that deaf people's needs must be incorporated into planning of transport and infrastructure.

Royal National Institute of Blind people (RNIB)

RNIB requests that bus drivers are trained to pull up close to the stop and notes that taxi drivers must be aware of their obligations under the Disability Discrimination Act. It states that all pedestrian crossings should have audible signals, welcomes plans to improve coordination with community transport, and requests that information related to transport, including LondonWorks and Dial-a-Ride is available in suitable formats, including online. It welcomes travel mentoring initiatives and the provision of real time information for bus services. While it supports the removal of street clutter, it states that there must be a delineation between the pavement and the kerb and opposes the removal of controlled crossings; it is also concerned the introduction of quiet electric vehicles as these would not always be perceived by other people, and calls for measures to address the potential safety risk.

Royal Parks

The Royal Parks supports the balanced vision for improving transport combined with enhancing quality of life through better place making and urges the Mayor to give rigorous protection to existing valued places such as the Royal Parks. It states that parks should be recognised in the strategy as landscape heritage. It supports and will work with the Mayor on the promotion of healthy travel options and increasing the number of trees and vegetation in London. It supports aspirations to encourage walking through improved streets and facilities and a greater provision of information, and to reduce the impact of noise and improve air quality in order to ensure the tranquillity of parks is maintained

Society of Motor Manufacturers and Traders Limited (SMMT)

SMMT is committed to working with the Mayor in order to improve road safety and engage in the forthcoming Road Safety Plan for London. It suggests that changes to the London Low Emission Zone and policies on air quality must take into account the complete Euro standard regime and supports the Mayor's initiatives in reducing CO₂ emissions through traffic management policies, conventional vehicle improvements and investment in a variety of new technologies. It is pleased to see the commitment to incentivising low carbon, electric; hybrid, hydrogen and other alternatively fuelled vehicles as early markets develop, including initiatives that can be implemented straight away. The SMMT urges the Mayor to ensure national collaboration in low carbon vehicle development and supporting infrastructure.

South & West London Transport Conference (SWELTRAC)

SWELTRAC welcomes the increased focus on transport issues in outer London but states that there should be stronger emphasis still and that the findings of the Outer London Commission should be given greater weight within the MTS. It welcomes the move towards a 'hub and spoke' approach. It supports the emphasis on boroughs to identify and implement proposals in their own areas but notes that they will need extra support and funding in order to achieve this. It welcomes emphasis on the

integration of services with National Rail as well as all proposals to help increase capacity on rail routes. It suggests that even more can be done to improve capacity at outer London interchanges, including East Croydon station. It is disappointed at the lack of commitment to large-scale orbital transport. It welcomes Crossrail and stresses the need for Crossrail 2. It urges that the strategy should include support for improved public transport access to all the airports serving London, rather than just Heathrow and opposes expansion at Heathrow, but feels that the strategy could be bolder in addressing issues of airport capacity. It would like to see Tramlink extended to locations such as Crystal Palace, Tooting and Sutton. It welcomes proposals to extend the Northern line and would like to see improvements to the District line. It supports proposals to keep the bus network under regular review and all means to improve information for bus passengers but would like to see more emphasis on the role of the bus in improving orbital travel. It is concerned that bus priority measures will lose much of their impact due to a change in LIP funding. It states that the potential for ferry services along the Thames and new crossing points should be investigated. It supports aspirations for a 'Cycling Revolution' and initiatives such as 'Biking Boroughs', Cycle Hire and Cycle Superhighways but notes there should be better consultation with the boroughs on the latter. It supports the Legible London initiative but does not feel enough emphasis has been given to how walking can reduce overcrowding and benefit health. It notes that the introduction of shared space in many areas would be welcome but requires a better definition of what constitutes a 'Better Street'. It supports the use of electric vehicles and proposals to get the infrastructure in place first in order to encourage a significant uptake. It welcomes any plans to promote car clubs and the use of other low carbon vehicles and carbon efficient technologies. It encourages a greater emphasis on Smarter Travel measures currently in place. It is concerned that proposals to smooth the flow of traffic could cause conflict with pedestrian use of the highway and requires greater clarity on the prioritisation of interventions. It supports consideration of use of bus lanes by coaches, minibuses and possibly HGVs where this is not already permitted.

South East England Development Agency (SEEDA)

SEEDA disagrees with the Mayor's position in opposing the expansion of the capacity of Heathrow but states support for improving public transport access to Heathrow as it will help address air quality considerations and help to mitigate climate change impacts. It also states support for the principle of high-speed rail links to Heathrow.

South East England Regional Transport Board

The South East England Regional Transport Board focuses its response on matters of strategic cross-boundary interest. It notes that many of the proposals, including many regarding National Rail, have a cross-boundary dimension relevant to South East England and that the final document should recognise this. It states that the document should recognise the role of London as an interchange point for trips across the Greater South East as well as consider local trips across the Greater London boundary to outer London town centres. It also notes that the significance of the M25 for route choices for London-bound traffic should be acknowledged.

South London Partnership (SLP)

SLP welcomes the coordinated publication of the strategies and the commitment to developing outer London, but states that inconsistencies between the plans must be resolved and that there is no vision or shape for south London emerging from the strategies. It states that small scale tram extensions need to be part of the strategy's investment programme. It stresses that new routes and infrastructure are required as well as better promotion in order to achieve the enhanced orbital travel objective. It welcomes the Sub-Regional Transport Plans but states that the emphasis on these means that strategy is light on detailed analysis, which makes it difficult for boroughs and businesses to establish their own development plans. It states that beyond committed schemes, there is little

prospect of major investment in SLP's identified transport priorities in the near future and therefore urges the Mayor to work with SLP to prioritise projects. It would like to see greater policy support and investment in Smarter Choices initiatives, and stronger commitment to investment in managing essential highways networks beyond the support given to traffic smoothing. It welcomes the more flexible approach to town centre parking in outer London and the support for Park and Ride schemes.

Steve O'Connell - Assembly Member

Steve O'Connell, Assembly Member for Croydon and Sutton, states that the MTS is an excellent document. He states that both the Tube upgrades and the construction of Crossrail will be of great benefit to London as a whole but notes that these will not be of direct benefit to South London. He would like to see a clear breakdown of the costs of desirable projects as well as more clarity over the order of priority of such projects. While he understands that a number of excellent schemes are currently unaffordable, he suggests that the strategy should make clear that specific improvements to South London's transport are at the top of the Mayor's future priorities as soon as funding becomes available. In particular he feels that the extension of the Croydon Tramlink to Crystal Palace as well as extensions from Purley to Brixton and a Sutton extension via Morden would be of huge benefit to South London.

Sustrans

Sustrans states that overall it supports the direction that the MTS sets out, as well as the six goals for transport in London. Sustrans also makes several recommendations for inclusion in the MTS such as interim targets for cycling growth and carbon dioxide emissions reduction. Sustrans recommends that there should be a focus on under-represented groups such as women and children in delivering the cycling revolution. Sustrans states that the MTS should set out a London-wide road traffic reduction target and that the scope and structure of expanded road user charging is established under the current mayoralty. Sustrans also recommends that the MTS should promote the reduction of traffic speeds and expansion of 20mph speed limits and should seek to smooth traffic flow by increasing the uptake of space efficient modes such as cycling. Sustrans also states its support for new pedestrian and cycle Thames crossings in east London, however it opposes proposals for additional Thames crossings for motor vehicles; Sustrans also opposes additional airport runway capacity provision in the south east.

Tandridge District Council

Tandridge District Council stresses the need to deal with growth impacts across GLA borders. It states that the cross boundary implications of rail in Croydon and Bromley should be taken into account and that it would like to see Thameslink completed, including the East Grinstead Railway line. It opposes expansion of Heathrow. It states that the cross boundary impact of any park and ride scheme in Bromley and Croydon should be taken into account in the strategy. It calls for the strategy to look at the potential of extending the Tramlink network to Selsdon and Purley / Streatham. It states that the strategy should take the cross boundary implications of bus routes into account and that there is scope to provide real time information on such bus routes. It states that cycle parking and hire facilities should be made available at London Terminal stations.

Thames Gateway London Partnership (TGLP)

TGLP states that the Thames Gateway is the area of the greatest expansion in the capital yet the Mayor's transport proposals are not consistent with this level of growth and states that there should be a commitment to early implementation of the Hall Farm Curve due to the enhanced access to jobs and services that it may bring. It states concern that some critical schemes to the sub region remain unfunded and schemes that are funded would not be delivered on a timescale consistent with the delivery of new homes in the London Plan. It is also concerned that no funding is in place for the

implementation of further river crossings and states that consideration should be given to renegotiation of the PFI credits that were available as part of the potential funding package for the Thames Gateway Bridge.

The Confederation of Passenger Transport (CPT)

The CPT states that the MTS has insufficient focus on coach travel and the benefits that this can bring to London. It identifies three areas where it would like to see further detail: coach parking facilities; traffic enforcement; and school transport. With regard to coach parking, it calls for better provision of safe and secure facilities both day and night, while coach operators are willing to pay for these, it requires local government to provide them. On enforcement, it would like a review of standards across London with a view to developing a more consistent system and more flexibility about where coaches can pick up and set down passengers. Finally it calls for the Mayor to encourage London boroughs to make dedicated coach parking bays outside schools.

The Crown Estate

The Crown Estate is pleased that proposals for central London will focus on tackling congestion, increasing the capacity of the rail network, encouraging walking and cycling and managing demand. It applauds the emphasis on the environment and stresses the importance of improvements to the urban realm, especially in the West End. It supports proposals for better streets and a better allocation of surface space between pedestrians, cyclists and motorists. It also supports initiatives to improve transport's contribution to the built environment welcomes measures to smooth traffic flow. It notes that work to review the bus network should include reviewing optimum provision and routes in the West End; balancing provision with that of other forms of transport and the impact on the public realm. It states that the delivery of Crossrail and upgrade of the Tube are essential and suggests the use of consolidation centres to ease congestion while work takes place. It supports initiatives to improve delivery and servicing and proposals to transfer freight to smaller low emission vehicles. It notes that since the Mayor has a legal obligation to comply with European targets for air quality, this must be given greater emphasis. It states that poor air quality should be approached in a more comprehensive way and suggests substantial reductions in high-emitting vehicles including buses.

Trade Union Congress (TUC)

The TUC welcomes an increased focus on the needs of businesses and organisations in the MTS, the Mayor's commitment to increasing capacity and investment in public transport and the integration of different modes, as well as welcoming the recognition that demand management may be necessary on some parts of the road network. It is concerned that targets for modal shift have been reduced, and the potential impacts of financial cuts on the provision of services, where it calls for more public ownership of projects. It states that it is wrong that so few Tube stations are accessible to wheelchair users and calls for consideration of the needs of the visually-impaired in making changes to street crossings and layout. It supports the Low Emission Zone, the transfer of freight from road onto rail and water (but calls for more investment in the relevant infrastructure) and supports schemes to reduce road congestion, including road charging for delivery and service vehicles.

Transport for All (TfA)

TfA states it welcomes the commitment to improve the physical accessibility of the transport system but is concerned that accessibility plans such as the step-free Tube programme have undergone funding cuts. However it welcomes the step-free transport opportunities that Crossrail will bring. TfA states that there should be regular engagement with disabled Londoners on Crossrail and the New Bus for London to ensure the service will meet their needs and states that clarification is needed on the level of accessibility on Thameslink services. It states support for the proposal for a '7 day railway', common service standards, staffing at stations and plans to make part of the new orbital

railway for London step-free however it would like to see plans expanded and is concerned that funding for step-free access on the Overground is not ring-fenced. It welcomes proposals to upgrade the Tube, station refurbishments and accessibility, increasing capacity and air conditioning on the Tube. It states that TfL should publish the response times to repair broken lifts and escalators as well as take more robust action against companies that allow buses to leave depots with faulty ramps as well as more rigorous training for bus drivers, and it states support for iBus and the 'Countdown' display at bus stops. TfA states its support for enhancing river boat provision but would like more detail on how accessibility will be factored into the proposals such as portable ramps. TfA states strong opposition for shared surfaces and states that the removal of the curb is dangerous. It states that TfL should ensure Blue Badge Holder in London have up to date and clear information as to where they can park, and is concerned about the enforcement of the priority seating on buses. It states its support for travel mentoring and states there should be more money for Dial-a-Ride and the Freedom Pass should be honoured on Door to Door transport.

Transport for London (TfL) – (TfL Board)

TfL Board notes the development of the MTS in tandem with the development of the London Plan and the Economic Development Strategy, and is fully supportive of the policies and proposals within it. It states that the TfL Business Plan has been structured around the six goals contained within the MTS to set out how TfL will deliver its contribution to the strategy to 2018. Beyond 2018, it notes that the rate of implementation of the MTS will depend on the financial environment and funding available. It reiterates its commitment to working with the Mayor, the GLA, the boroughs and other agencies in order to implement the Mayor's vision for London

Transport Planning Society (TPS)

The TPS welcomes the MTS's recognition of the need for a balance between enhancing capacity and managing demand; it also welcomes the proposals for improving customer service on the National Rail network. However it would like to see more details on how buses will be used, particularly to support suburban centres. It states that the MTS could aim to enable wheelchair users to travel spontaneously rather than booking in advance but states that the MTS is right to recognise that accessibility is not just about step-free access. It welcomes the proposals to improve safety and security, better streets and cycling infrastructure, although it notes that secure cycle parking will be vital. It states that street design that encourages slower driving should be used rather than time-distance cameras and states smoothing traffic flow should not mean allowing more or faster traffic flow. It welcomes the recognition that additional road user charging or other demand measures may be needed and supports the use of pricing differentials based on vehicle emissions; it also states that a fully-integrated fare system is an important goal.

Transport Salaried Staffs' Association (TSSA)

TSSA notes that the policies and proposals in the MTS require a multi-agency approach and prefers that staff are permanent and in-house, and is critical of recent private sector involvement in Tube maintenance contracts. It is concerned about reductions to the step-free access programme; is cautious about water transport; and states that the removal of the Western Extension will reduce revenues further and have negative air quality and congestion effects. It is also concerned about reductions in funding of the Commercial Vehicle Education Unit and increases to bus fares, stating that fares can be an important factor in encouraging travel behavioural change. It would like flexible working included in the Strategy and for TfL to explore new ways of raising funds; it also states that the goals of the MTS will not be met without road user charging.

UKLPG (UK Liquefied Petroleum Gas)

UKLPG supports measures to increase the use of Liquid Petroleum Gas (LPG) as a low carbon alternative to conventional fuels. The 100 per cent discount on the Congestion Charge for LPG vehicles to continue; and it states that there should be parking discounts for LPG vehicles.

Unite the Union

Unite the Union calls on the Mayor to adopt a higher target for increased public transport mode share, stating that achieving this shift is important for a range of reasons including London's position as a world city and to meet climate change objectives. It states that there has been a reduction in planned bus kilometres and calls for a reversal of fare increases, retention of the bus subsidy at previously planned levels and an expansion of the network, particularly in outer London. On fares generally, it is concerned that these will continue to rise over the life of the Strategy, with negative impacts on the lowest-paid and on achieving modal shift. It supports the third runway at Heathrow but believes there must be reductions in CO₂ emissions associated with Heathrow, for example by high-speed rail links and local congestion charging. It is concerned about constraints on the transport budget and notes that the removal of the Western Extension will further constrain revenue; instead of the New Bus for London, it calls for the development and introduction of a zero emission bus fleet by 2015.

University of East London (UEL)

UEL states its general support for the three Mayoral strategies and particularly welcomes the principle of convergence, whereby the host boroughs for the 2012 Games achieve parity with the London average across a range of socio-economic indicators. It notes the range of agencies which will deliver this in London and states that these, including the GLA group, need to work together effectively and across strategic service boundaries. It states that transport planning should seek to address the uneven spread of services and institutions across London, and in this context welcomes a Thames Gateway crossing, eastwards extension of the DLR and the use of the Hall Farm Curve.

Valerie Shawcross - Assembly Member

Valerie Shawcross states that the priorities for the MTS should be investment in sustainable transport, increasing the capacity of public transport, reducing car use, encouraging more people to make their journeys on foot or by bike; and tackling congestion on public transport. Ms Shawcross also states that the MTS fails to plan for London's long-term transport challenges and states that the MTS serves to deliver identified and ongoing schemes but not future and unfunded schemes. Ms Shawcross states that the MTS fails to plan for the predicted population and employment growth in the capital. Ms Shawcross states that there is a gap between the desired outcomes and the ability of proposed policies to achieve the goals, and states that there is no clear strategy to progress possible projects. Ms Shawcross agrees that achieving CO₂ emission reduction targets, yet questions whether proposals such as bus fare increases, Low Emission Zone Phase 3 deferral and the proposed removal of the Western Extension Zone will help to achieve a shift to public and sustainable transport. Ms Shawcross states that decisions to cancel projects related to accessibility should be taken in consultation with disability groups and states her concern over cuts to projects that improve physical accessibility. Ms Shawcross is concerned that the cancellation of plans for the Thames Gateway Bridge and Cross River Tram will have negative effects on regeneration in, for example, Elephant & Castle and states that it is unclear in the MTS if the Thames Estuary airport is to be pursued, and suggests it is not developed further. Ms Shawcross states that London's economic growth must not be limited to central London, and that the MTS must contain serious proposals for high capacity public transport improvements for outer London such as bus services. Finally Ms Shawcross identifies several risks in the delivery of projects including: the deferring or scaling back of station upgrades on

former Metronet lines, upgrades being behind schedule on the Jubilee line, disputes regarding the second period of the Tubelines upgrade contract and plans to reduce TfL's budget by £5bn.

Walk England

Walk England welcomes the Mayor's proposals to encourage walking and advocates the following: that the Mayor should embrace an overarching vision for a walkable city; a clearer statement of the wider benefits of walking and the publication of the Physical Activity Strategy for London. With regard to the Strategic Walk Network, it urges that this is maintained and promoted beyond 2012 and suggests a number of locations for its extension.

West London Partnership

West London Partnership supports the overall aims and objectives of the MTS but it has concerns that there are several west London issues that are not dealt with satisfactorily in the MTS and that there is no hook for the Sub-regional Transport Plan to deal with these issues while remaining compliant with MTS. It considers there is also no clear statement on the mechanism for achieving cross-boundary coordination, which should include sub-regional partnerships and boroughs. It considers that it would be better if less was said in the MTS about the needs of and proposals for the sub-regions so that there would be more scope for the Sub-regional Transport Plan for West London to respond to the real issues the sub-region faces. It also considers there should be a more consistent read across between the MTS and the London Plan, particularly that growth and development opportunities set out in the London Plan will be frustrated by lack of transport investment. It also considers the MTS should note the importance of car parking policy and standards as a demand management tool and a means of enabling access to developments. It considers there is a need to monitor congestion levels on key hub and spoke routes in West London and that the hub and spoke network in West London should be mentioned. It is concerned there is no MTS ambition to reduce journey times or support for removing bottlenecks on West London's highway system except through smarter travel initiatives. It is concerned there is no detail on how town centres, opportunity areas and major developments are to be served with transport infrastructure and public transport services to support development; that investment in orbital public transport is completely focussed on the North and West London lines with no attempt to connect this orbital transport provision with Crossrail at Old Oak Common; and that there are no proposals to improve orbital public transport elsewhere in West London with no mention of West London Orbital Rail, Wembley to Park Royal Fastbus or other bus-based orbital services, for example the proposed extension of the North London line to serve Hounslow, or to improved rail access to Uxbridge. It disagrees that London has a comprehensive orbital bus network and considers the role of freight quality partnerships has been ignored; that there is a lack of plans for improving accessibility at West London stations; that aviation plans are not satisfactorily detailed; and that smarter travel initiatives should focus on the most carbon intensive movements, such as long-distance commuter travel, business travel, visitor travel and fleet and goods movements.

Westminster City Council

Westminster City Council supports the overarching vision and goals set out in the MTS, and notes that it aligns with its own policies and programmes. It identifies a number of areas where particular attention is needed; calling for policies to increase capacity to be met by expansion of surface and Underground rail and Crossrail. It states that there is a case for reviewing the operation of the bus network in central London and that while it welcomes the proposed removal of Western Extension Zone there is no proposal to remove the original central zone, which it continues to oppose. It states support for the promotion of smoothing traffic flows and lane rental scheme as well as stating support for the Cycle Hire scheme. It states that Legible London should be further developed and states that more reference should be made to car clubs due to their potential to reduce air pollution. Westminster

City Council states that the following schemes should be set out in a realistic implementation programme and that boroughs' responsibilities for their delivery should be defined: Thameslink, Crossrail, London Underground line upgrades, station congestion relief, Victoria and Paddington upgrades, Western Extension Zone removal, bus network improvements and cycling and walking initiatives. It states that the following schemes should be safeguarded in the MTS: Crossrail 2, DLR extension west of Bank, High Speed 2 and the Northern line extension. It supports proposals to encourage walking and states that smoothing traffic flows must not be at the expense of reduced road crossing times; it would also like the greater integration of modes; and urges the Mayor to strengthen cycle parking standards across London. It states that there should be a review of the bus network, so that it can serve London appropriately. It questions whether there are adequate standards in place to ensure river services use less polluting engines and supports the encouragement of freight consolidation schemes. Westminster City Council supports the inclusion of a policy to enhance connectivity, reduce severance and improve access to employment, and identifies areas in the borough that might benefit from such a policy. It welcomes proposals for TfL to work with the boroughs on Air Quality 'hotspots'; it supports the proposal to include NO_x in the Low Emission Zone (LEZ) and calls for clarification of the proposed changes to the LEZ implementation timetable, as well as suggesting modification to the scheme; and it prefers that TfL operate Low Emission Zones rather than have several boroughs run zones. It states that the requirement for all buses in London to meet the Euro IV standard for NO_x by 2015 is insufficiently ambitious and calls for the electrification of the rail network across London. Westminster City Council recognises that road user charging has the potential to improve air quality and that further schemes may be needed across London, but this must be considered in consultation with the boroughs, and take account of economic severance in deprived areas. Westminster City Council urges the Mayor to consider a limit on future fare increases and certain concessionary fares for the most vulnerable.

Annex C - TfL's consideration of late responses to the consultation

This annex is Transport for London's consideration of late responses to the Mayor's Transport Strategy

All responses until the 31st March are considered here, copies of these responses and any further late responses were forwarded to the Mayor.

This annex considers responses in the following order

1. Open Responses (11)
2. Questionnaire responses (26)

Section 1: Open Responses

List of late stakeholder respondents received

Organisations (3)

Councillor Paul Webbewood – (London Borough of Greenwich)
Ibero-American Community Group
The Westminster Society

Businesses (4)

DB Schenker Rail (UK) Ltd
Muswell Hill Metro Group
Quintain Estates and Development PLC
Real Estate Opportunities Limited

Public (4)

Comments included in open responses have been coded to the codeframe. The table below shows the issues raised and how many respondents raised them, sorted in descending order of number of comments made.

Code	Comment made on:	Number of Respondents making a comment
A6	Other (Tube)	4
T4	London Plan comment (planning issues)	3
A4	Tube line extensions	2
B2	Increased rail capacity	2
B8	Crossrail 1 & 2 (inc Chelsea-Hackney line)	2
B11	Other (Rail)	2
C5	Other (Interchange)	2
F1	Bus Service / route issues	2
F3	Bus design inc New Bus, Bendy Bus	2
H2	Smoothing traffic flow	2
I6	Other (Freight)	2

Code	Comment made on:	Number of Respondents making a comment
N10	Other environment / climate change comment	2
P2	Physical accessibility improvements, eg step-free tube, bus ramps	2
S6	Regeneration / Economic downturn (general)	2
S8	Olympic Games 2012	2
T1	Working with Boroughs / LIPs process / Sub-regional plans	2
T2	Financing transport schemes	2
T3	Fares and ticketing	2
T7	Positive General Comment on MTS	2
A1	More reliable / longer hours tube service	1
A2	Improvements to tube stations / staffing	1
A5	Air con on tube	1
B1	Improved service levels (staffing, clean, secure)	1
B4	High Speed 1 / rail links to Europe	1
B5	TfL Overground rail (inc East London Line, North LL)	1
B6	Integration of TfL / NR services eg Oyster PAYG on all rail (and Mayoral control / influence of NR)	1
B7	Improved services inner + outer London	1
B9	DLR comment	1
M2	Surface access to airports and High Speed 2 rail	1
D4	Cycle Superhighways	1
D7	Other (Cycling)	1
E2	Pedestrian access to PT and safety	1
E4	Development of key walking routes	1
E5	Other (Walking)	1
H1	Parking	1
H7	Other (Better Streets / Roads)	1
I2	Freight consolidation / distribution	1
I3	Environment / noise impacts of freight	1
I5	Rail freight	1
J2	Integrating Thames with other transport (including Oyster)	1
J4	River crossings	1
J5	Other Thames / waterways / River Crossing comment	1
N1	Noise Pollution (General)	1
N7	Electric vehicles	1
N8	Adapting to / Risk Mgt of Climate Change	1
N9	Transport impact on natural environment	1
N11	Targets for CO2	1
N12	Targets for Air Quality (incl. EU targets on NO2 and PM)	1
O7	Against for Deferment / Suspension of Phase 3 of LEZ	1
P1	Public transport and access to services - eg health, education, jobs	1

Code	Comment made on:	Number of Respondents making a comment
Q2	Public Transport Safety (general)	1
R3	Smarter Travel (inc workplace and school travel plans)	1
R5	Other demand mgt / road user charging / traffic reduction	1
S1	Orbital Connectivity	1
S3	Outer London comment	1
S5	Comment on local issue	1
S7	Cancelled Schemes (eg Cross River Tram, Thames Gateway Bridge)	1
S10	Modal Shift / sustainable choices	1
T8	Negative General Comment on MTS	1
T9	Other re Mayor or TfL	1
T11	Other Strategies / UK Agencies	1

Section 2: Questionnaire Responses

Late public questionnaires received

26 paper Questionnaires were delivered to TfL on 1 March 2010. The analysis of the responses is below:

Q1: Questions about you

Note: Due to the small number of late respondents, some percentage totals may be greater than 100% due to rounding.

Do you live in London?	Total (%)
Yes	73%
No	23%
Not Stated	4%
Total Responses	26

Do you work in London?	Total (%)
Yes	65%
No	31%
Not Stated	4%
Total Responses	26

In what capacity are you responding to this consultation?	Total (%)
As an individual	96%
As a representative of a business or organisation	4%
Not Stated	0%
Total Responses	26

Are you:	Total (%)
Male	73%
Female	23%
Not Stated	4%
Total Responses	26

What is your ethnic background?	Total (%)
Asian / Asian British	4%
Chinese	0%
White	81%
Black / Black British	0%
Mixed ethnic background	0%
Other ethnic group	15%
Total Responses	26

What is your age group?	Total (%)
Under 16	0%
16-24	4%
25-44	31%
45-64	54%
65+	12%
Total Responses	26

Q2: Transport for London is proposing a range of measures to improve travelling in London; for each category listed below please tick those that you consider would bring most benefit:

Note: As respondents could select as many options as they wish within each sub-question, the percentages for the respondents change with each question and usually total more than 100%.

Tube	Total (%)
No response	12%
Providing air conditioning on trains	38%
Expanding step free access	35%
Building more Tube lines	38%
Providing more frequent trains	19%
Delivering a more reliable service	42%
Other (Please Specify)	31%
Base	26

Rail	Total (%)
No Response	12%
Enabling passengers to use Oyster pay as you go across all rail in London	54%
Providing more capacity on the DLR and Tramlink	23%
Building more rail lines	27%
Improving the cleanliness, security and quality of suburban rail stations	38%
Creating an improved service for Inner and Outer London	42%
Other (Please Specify)	27%
Base	26

Interchange	Total (%)
No Response	15%
Reducing the need to come in to central London to interchange for journeys to other places	58%
Improving the design and quality of areas around stations and termini	31%
Redesigning stations to provide more capacity	27%
Providing more facilities to drop off car passengers so they can continue their journey by public transport	27%
Other (Please Specify)	12%
Base	26

Cycling	Total (%)
No Response	31%
Providing more secure cycle parking	46%
Introducing specially designated Cycle Superhighways	27%
Introducing Cycle Hire Schemes	15%
Providing more cycle training	23%
Other (Please Specify)	23%
Base	26

Walking	Total (%)
No Response	23%
Providing more information about journeys that could be undertaken by foot	19%
Improving the quality and design of streets	31%
Improving signs and other information to help people find their way better	31%
Tackling crime and fear of crime	46%
Improving pedestrian access to stations and improving safety in surrounding areas	35%
Other (Please Specify)	12%
Base	26

Buses	Total (%)
No Response	15%
Providing more information at bus stops	58%
Developing a New Bus for London	19%
Phasing out the bendy bus	27%
Ensuring all new buses from 2012 have environmentally friendly engines	50%
Other (Please Specify)	27%
Base	26

Information	Total (%)
No Response	15%
Providing travel planning and guidance to assist people in deciding how to travel	35%
Enhancing the provision of up to minute information, for instance online and by text message	42%
Improving the travel information assistance provided at stations	31%
Introducing journey planning tools which are focused on specific areas, eg town centres	19%
Building consistent signage and information for cyclists and pedestrians	23%
Other (Please Specify)	19%
Base	26

Better Streets	Total (%)
No Response	4%
Encouraging the uptake of low emission vehicles	50%
Removing unnecessary signage and clutter	46%
Introducing shared space schemes to improve the look and feel of streets and make them safer	15%
Using high quality and attractive materials for pavements and streets	46%
Other (Please Specify)	23%
Base	26

Freight	Total (%)
No Response	19%
Promoting the use of the Thames and other waterways for freight	69%
Encouraging out-of-hours delivery	38%
Building more centres to transfer freight to cleaner vehicles for local deliveries	46%
Other (Please Specify)	0%
Base	26

The Thames	Total (%)
No Response	23%
Introducing Oyster on passenger services	62%
Raising service standards and making them consistent with other public transport	23%
Introducing more stops	31%
Providing more environmentally friendly boats	35%
Other (Please Specify)	12%
Base	26

Question 3: Additionally, there are some particular issues we would like your opinion on; please consider the following two questions

Note: Some respondent's selected more than one option as such percentages may add up to more than 100%

Demand Management

To what extent do you agree or disagree that a fair system of managing demand for road use should be used if necessary?

Demand Management	Total (%)
Strongly agree	35%
Agree	12%
Neither agree nor disagree	8%
Disagree	12%
Strongly disagree	15%
Don't know	4%
No Response	19%
Base	26

Western Extension of the Congestion Charging Scheme

To what extent do you agree or disagree with the proposal to remove the Western Extension?

Western Extension	Total (%)
Strongly agree	27%
Agree	12%
Neither agree nor disagree	4%
Disagree	8%
Strongly disagree	27%
Don't know	18%
No Response	12%
Base	26

The Mayor's Transport Strategy – Public Consultation

Draft Report

March 2010

TfL project number: 08006

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EXECUTIVE SUMMARY

Introduction and Background

This report is on the public, business and Other Organisation responses received as part of the public and stakeholder consultation on the new draft Mayor's Transport Strategy (MTS).

The first phase was a consultation with the London Assembly and Functional Bodies on a 'Statement of Intent' for the new draft MTS. This took place in summer 2009.

The second phase of consultation on the new draft MTS is with public and stakeholders, and took place between 12 October 2009 and 12 January 2010. Accent accepted for analysis all responses received up to 20 January 2010; those received after this date were forwarded to TfL for separate analysis.

Response

There were 5,578 responses to the consultation received by January 2010.

Responses from Questionnaires

The main body of the questionnaire invited respondents to identify which measures to improve travelling in London would bring most benefit. These measures were grouped into 10 themes, as set out below:

¹ 'Other Organisations' were those organisations that responded to the public consultation exercise on behalf of the interests of a wider group.

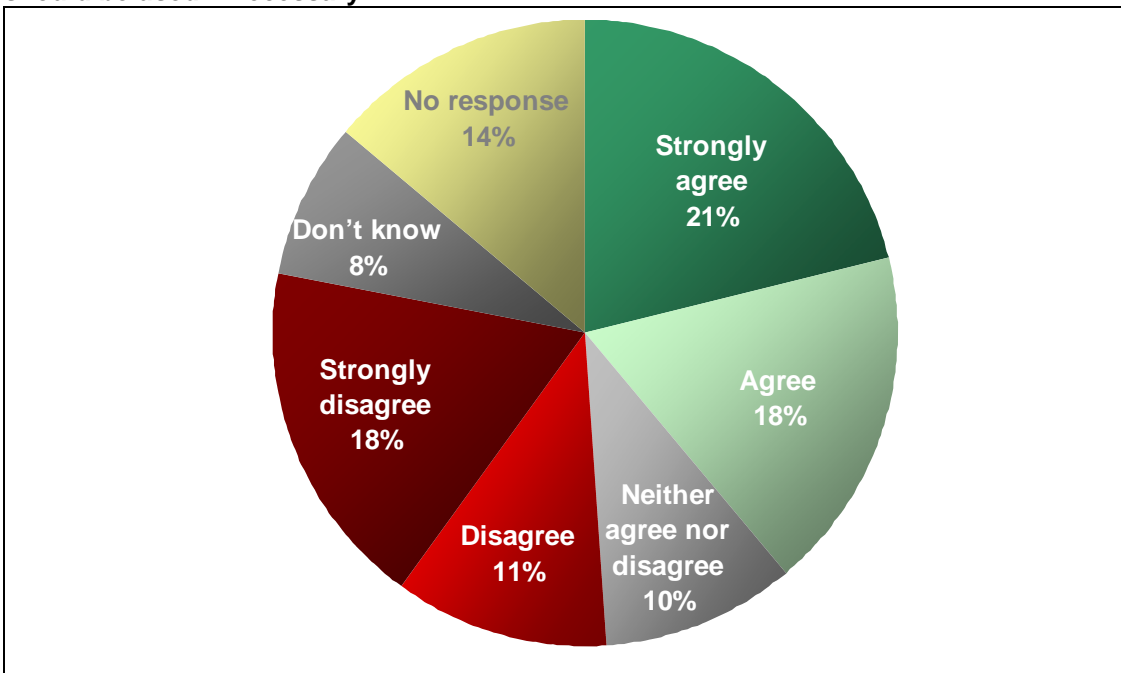
Across these ten sections the ten most ticked measures are shown below along with the sections they are in. Percentages show the proportion of respondents selecting this option.

Section	Response	%
Rail	Enabling passengers to use Oyster pay as you go across all rail in London	54
The Thames	Introducing Oyster on passenger services	51
Interchange	Reducing the need to come in to central London to interchange for journeys to other places	50
Tube	Delivering a more reliable service	49
Freight	Promoting use of the Thames and other waterways for freight	49
Walking	Tackling crime and fear of crime	47
Better streets	Removing unnecessary signage and clutter	47
Tube	Providing air conditioning on trains	44
Freight	Encouraging out-of-hours delivery	43
Buses	Providing more information at bus stops	42

Demand Management

The questionnaire asked whether respondents agreed that a fair system of managing demand for road use should be used if necessary. Overall, 39% agreed and 29% disagreed.

Figure 1: Whether agree or disagree that a fair system of managing demand for road use should be used if necessary

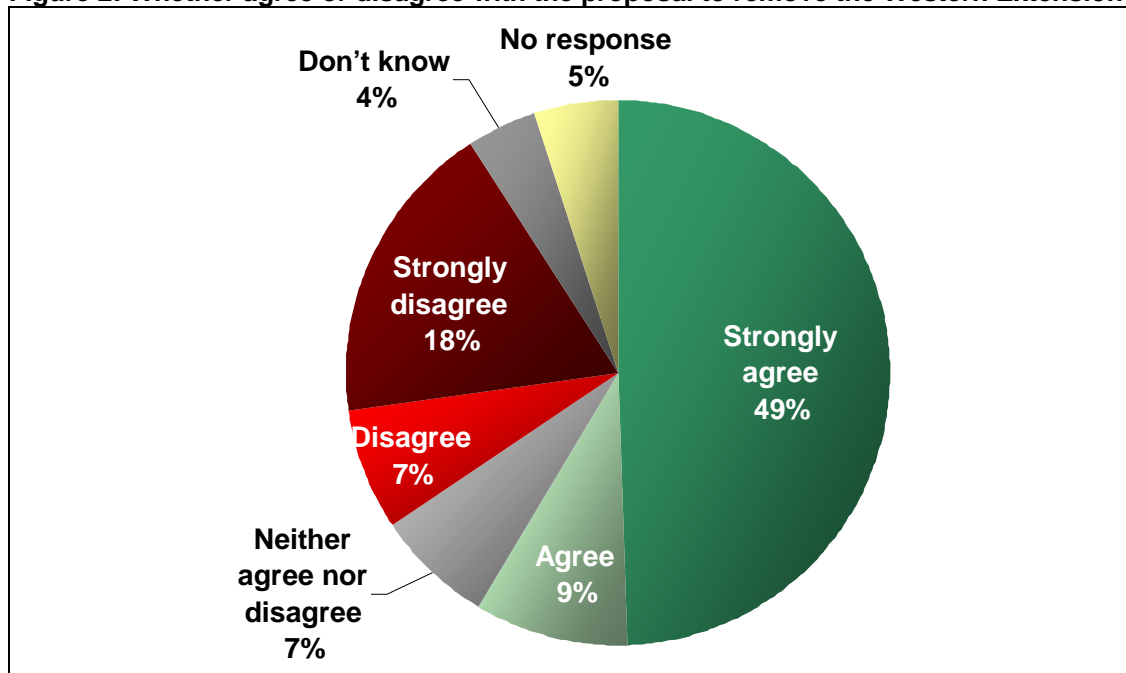


Base: 4,948 all questionnaire respondents

Western Extension (WEZ) of the Congestion Charging Scheme

The questionnaire also asked whether respondents agreed or disagreed with the proposal to remove the Western Extension. Overall, over half (58%) of all questionnaire respondents agreed to the proposal to remove the Western Extension. A quarter of the consultation respondents disagreed.

Figure 2: Whether agree or disagree with the proposal to remove the Western Extension



Base: 4,948 all questionnaire respondents

General Public – ‘Open’ Responses

The 551 respondents made 2,347 codeable comments, an average of 4.3 per respondent.

For the general public the five topics most frequently commented on were²:

- Fares and ticketing
- Opposes removal of WEZ
- CO₂ emissions general
- Supports removal of WEZ
- Road safety.

Business 'Open' Responses

For the 24 business responses the four topics most frequently commented on were³:

- Financing transport schemes
- Integrating London's transport system and services
- Surface access to airports and High Speed 2 rail
- Crossrail 1 & 2.

² See Table 34: Comments made by general public respondents

³ See Table 35: Comments made by business respondents

Other Organisations

For the 55 Other Organisations the five⁴ topics most frequently commented on were⁵:

- physical accessibility improvements eg step-free tube, bus ramps
- bus service/route issues
- CO₂ emissions general
- Financing transport schemes
- Orbital connectivity.

⁴ The following two categories for comments that could not be coded under a theme were fourth and fifth 'Other - better streets/roads' and 'Other – rail'. We show the top five specific areas

⁵ See Table 33: Comments made by Other Organisations

1. INTRODUCTION

1.1 Background

The Mayor of London, Boris Johnson, has decided to produce a new Mayor's Transport Strategy (MTS), which is the principal policy tool through which the Mayor exercises his responsibilities for the planning, management and development of transport in London. The development of this strategy has been delegated to Transport for London (TfL), although the Mayor retains responsibility for the approval of the documents consulted upon. TfL has also been delegated responsibility for undertaking the necessary consultation exercises.

In line with statutory requirements, two phases of consultation were required before the Mayor could publish a revised Transport Strategy. The first phase was consultation with the London Assembly and Functional Bodies on a 'Statement of Intent' for the new draft MTS. This took place in summer 2009.

The second phase of consultation on the new draft MTS was with public and stakeholders, and took place between 12 October 2009 and 12 January 2010. TfL commissioned Accent to analyse and report on the public, business and other organisation responses received during this phase of the consultation. TfL officers analysed responses from stakeholders and their analysis will be presented in a separate Report to the Mayor.

Following the completion of this consultation, and the Mayor's consideration of the responses received, it is anticipated that a new MTS will be in place in Spring 2010.

This report is on the qualitative and quantitative analysis of the public representations (comprising public, business and other organisations' responses) received during the public consultation on the MTS.

1.2 The MTS

The MTS is the principal legal tool through which the Mayor exercises his responsibilities for the planning, management and development of transport in London. The MTS supports the London Plan, provides the context for the more detailed plans of the various transport related implementation bodies and constitutes the overall policy framework within which London transport services are planned and delivered.

As set out in the Greater London Authority Act 1999 the MTS should contain policies for "*the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London*" and proposals for securing the facilities and services (both people and goods) needed to implement the Mayor's policies over the lifetime of the Strategy. The Act also requires that the following four cross-cutting themes are addressed to:

- promote improvements in health (including mitigating detriments to health)
- promote the reduction in health inequalities
- contribute to the achievement of sustainable development
- contribute towards the mitigation of, or adaptation to, climate change.

The MTS must also include an Accessibility Plan and timetable and requires the Mayor to consider the promotion of equality and to have regard to the River Thames in the development of the Strategy.

This is the first new MTS since the original one was published in 2001 and was twice revised. These revisions took place in 2004 and 2006 to enable the Western Extension to the Congestion Charging Zone (WEZ) and the introduction of the London Low Emission Zone (LEZ) respectively.

A new MTS is required, rather than further revisions to the 2001 MTS, as the future major challenges for transport in London cannot be adequately addressed within the current MTS. Further drivers for a new MTS are the recent changes in political direction for London with the election of Boris Johnson in May 2008; London's successful bid to host the 2012 Olympic and Paralympic Games; the commencement of work on Crossrail; and the implementation of the Public Private Partnership for work on the Underground.

In addition, as set out in the public consultation draft MTS, the continued growth of London post-2017 will put greater pressure on the transport system and present challenges in terms of road congestion, air quality, CO₂ emissions and quality of life. The investment set out in TfL's ten year Business Plan as published in November 2008, and the government's High Level Output Strategy for railway investment and service improvements for the period 2009-14 (HLOS 1) will deliver significant benefits in terms of increased capacity and service improvements, but will not address all of the challenges facing London.

The draft MTS sets out policies and proposals for transport in London to 2031. It is structured around six overarching goals:

- supporting economic development and population growth
- enhancing the quality of life for all Londoners
- improving the safety and security of all Londoners
- improving transport opportunities for all Londoners
- reducing transport's contribution to climate change, and improving its resilience
- supporting delivery of the London 2012 Olympic and Paralympic Games.

1.3 The Consultation

The Mayor's Vision for London

The new MTS is being developed in parallel with the revision of the London Plan (the Mayor's spatial strategy for London) and the Economic Development Strategy, using a shared evidence base. This alignment provides an opportunity to facilitate the integration of strategic land use, transport and economic development planning decisions affecting London. The three documents together set out an integrated 'Strategy for London' with a single, long-term vision for the Capital.

The MTS will support the Mayor's vision for London, as set out in the initial proposals for the London Plan. Hence, the Transport Strategy Statement of Intent, which was consulted on during the consultation with the Assembly and Functional Bodies in

summer 2009, outlined potential land-use and economic development options for London, as well as the potential transport approaches.

As far as possible, the consultations for the three strategies have been aligned, although the London Plan is subject to different legal requirements (including an Examination in Public) which affect its timetable.

The development of the London Plan and, by extension the MTS, has been informed by the findings of the Outer London Commission, which was set up by the Mayor early in 2009 to explore the land-use options for encouraging greater economic growth in outer London. In its interim report of July 2009, the Commission recommended that, while growth should be supported in outer London town centres, this should be focused on existing town centres rather than a smaller number of strategic 'hubs'. The public consultation draft of MTS therefore included policies and proposals to support further growth around town centres and corridors, as well as other growth and intervention areas as identified in the London Plan.

Soon after the public consultation on the draft MTS began, the Mayor made his annual announcement on the fare levels for 2010. In November 2009, TfL published its annual update to the ten year Business Plan (2009/10-2017/18).

The Consultation phases: with Assembly and Functional Bodies; with public and stakeholders

There were two phases of statutory consultation associated with the preparation of a new Strategy. In the first phase, the Mayor was required to consult the London Assembly and the four Functional Bodies (the London Development Agency, the London Fire and Emergency Planning Authority, the Metropolitan Police Authority and TfL) before undertaking wider consultation. The Mayor was also under a duty to consult with the Olympic Delivery Authority (ODA). For the first phase of the consultation, TfL, on behalf of the Mayor, produced a draft MTS Statement of Intent, which set out the guiding principles and broad policy statements for the development of the new MTS. This consultation phase lasted eight weeks and took place between 18 May and 13 July 2009. Responses from other organisations and the public were also accepted.

TfL presented its analysis of these responses in its Report to the Mayor of October 2009. The Mayor also wrote to the Chair of the Assembly to identify which of the Assembly's submitted comments were accepted by the Mayor for implementation in the strategy and which were not, and set out the reasons why any comments so submitted were not accepted. Both the Report to the Mayor and the Mayor's Statement to the Chair of the Assembly may be downloaded from:

<http://mts.tfl.gov.uk/Read-the-strategy/Supporting-documents.aspx>

The second phase of consultation was with the public and stakeholders on a draft MTS, which incorporated changes made as a result of the Assembly & Functional Bodies consultation. The consultation took place between 12 October 2009 and 12 January 2010. Extra time was added to the usual 12 week consultation period because of the holiday period. The following section describes how the consultation was promoted to the public and how they could respond. The remainder of this report presents Accent's analysis of the responses received from the public, businesses and other organisations.

Engagement with stakeholders, and the Assembly and Functional Bodies, was undertaken by TfL. An analysis of their responses, and recommendations to the Mayor, can be found in TfL's Report to the Mayor, to which the present Report is an appendix.

Process for Public & Stakeholder Consultation

In order to make good use of resources, and to effectively communicate the Mayor's overarching Vision for London, much of the communication activity for the MTS was integrated with the activities to raise awareness of the consultations on the London Plan and the Economic Development Strategy.

Accordingly, the consultations on the three strategies were branded together under the tagline 'Help Shape London's Future', and shared resources and approaches. The GLA hosted a dedicated website with a joint landing page for the three consultations at the following address: <http://www.london.gov.uk/shaping-london/>

Visitors to the site could read and download the full version of the draft MTS as well as view summaries and maps. Supporting documents were also available for download online: the Integrated Impact Assessment (IIA) of the draft MTS; the economic evidence base and documents related to the first phase of consultation on the Statement of Intent. TfL produced a public information leaflet with an integral questionnaire which could be downloaded from the website or requested from TfL's call centre. The questionnaire (which is reproduced in Appendix A of this report) presented a number of questions about the options for improvement to London's transport and also provided space for free text comments. The questionnaire could be detached from the leaflet and sent to Accent using a postage-paid address.

Respondents could also use this address for letter responses and an email address (mts@london.gov.uk) was also provided.

The questionnaire was also available to complete online, following verification of the respondent's email address. Respondents were asked to provide their email address before accessing the questionnaire; an automatic email containing a hyperlink to the questionnaire was then sent to the respondent. This process was intended to prevent automated submissions and also to enable monitoring for duplicate submissions.

In addition, 21 'Shaping London' roadshows were jointly run by TfL, LDA and GLA at venues around London. Members of the public could view the draft Strategies, pick up leaflets, complete and return the questionnaire and speak to officers about the consultations.

Editorial pieces were placed in a number of London titles to encourage people to take part in the consultation by visiting the Shaping London website to find out about the roadshows or complete the questionnaire online. There was also some advertising of the consultation in the London press. A poster advertising the consultation was placed in Tube stations and bus shelters in Zone 1, and leaflets were available from racks in selected Tube stations. Further information about the promotional activity for the consultation is provided in Chapter 2 of TfL's Report to the Mayor.

1.4 Objectives

The objectives of the Consultation were to inform Londoners and other interested parties about the Mayor's proposed strategy for transport, and seek their views on the policies and proposals contained within it. These views would then inform TfL's Report to the Mayor and any recommendations for amendments to the proposed revisions to MTS.

2. METHODOLOGY

2.1 Introduction

This section describes the methodology of the processing and analysis of the responses to the consultation.

2.2 Nature of Responses to the Consultation

The following types of submissions were received:

- Paper questionnaires
- On-line questionnaires
- Open responses (ie letters or emails) from:
 - the general public
 - businesses
 - Other Organisations.

Any Stakeholder responses were forwarded to TfL for analysis by them.

2.3 Other Organisations Responses

'Other Organisations' were those organisations that responded to the public consultation exercise on behalf of the interests of a wider group; for example, local business representative groups, residents' associations etc.

2.4 Return of Responses

The paper questionnaires included a postage-paid address:

Mayor of London Transport Strategy
PO Box 65064
London
SE1P 5GE

As set out in Section 1.3 above, the paper questionnaire was available at roadshows, on request from TfL's call centre, and at certain Tube stations. It could also be filled in online at <http://www.london.gov.uk/shaping-london/>

- Web survey responses were collated by TfL and sent to Accent on a weekly basis by secure FTP
- Emails and letters that were sent to TfL were forwarded to Accent on a weekly basis;
- Responses were received throughout the consultation period – 12 October 2009 to 12 January 2010 – and up to 20 January 2010. Those received after this date were sent to TfL for analysis.

Logging

All responses were logged prior to processing and analysis.

- On receipt the responses were numbered and batched ready for coding and analysis;
- All responses were assigned a unique record number so that they could be identified in the data set;
- A different series of record numbers was assigned according to the source of the response: questionnaires, other organisations, business and public open responses.

Freedom of Information Act

All responses were opened within two days of receipt and initially checked to see if there were any requests for information under the terms of the Freedom of Information Act. The Freedom of Information Act gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. If there were such requests these would have been immediately forwarded to TfL. There were no such requests.

2.5 Coding

The open response questions were individually analysed.

Most of these responses were written within the boxes provided in the questionnaire. Some respondents also attached a note with additional comments. These were included in the analysis and separately typed or scanned and appended to the appropriate questionnaire in the database.

The open responses were coded with up to four codes using a code frame. The initial code frame was developed after coding the first 1,000 questionnaires. A copy of the final code frame is included as Appendix B.

Obscene comments were coded 'rude/irrelevant'. General comments not relevant to the draft MTS were coded as irrelevant.

As a check on the consistency of coding staff and to ensure that all elements of responses were correctly coded and included, rigorous quality checks were applied. This included:

- a 10% back check of all coding undertaken
- a 10% back check of all data entry undertaken
- checking of the first 50 questionnaires coded for each coder.

Any errors identified as a result of miscoding were corrected.

Coding of Open Submissions

Open submissions from other organisations, the general public and businesses were received as letters (both handwritten and typed), emails, faxes, petitions and documents, some of substantial length.

All typed responses were scanned using optical character recognition (OCR) software and the responses proofed before being entered into the appropriate Microsoft Excel spreadsheet (ie other organisation, business etc).

The open text was then individually analysed to the code frame.

2.6 Code Frame Structure

The code frame (see Appendix B) was structured to follow the questionnaire with the following groups of codes for the free text sections of Q2 and Q3 as follows:

- Q2
 - A Tube
 - B Rail
 - C Interchange
 - D Cycling
 - E Walking
 - F Buses
 - G Information
 - H Better Streets
 - I Freight
 - J The Thames
- Q3
 - R Demand Management
 - O Western Extension

In addition, other categories of codes were created as follows:

- L Taxis, private hire and coaches
- M Airports/access to airports
- N Environment, Air Quality & Climate Change (CO₂)
- P Accessibility
- Q Crime, Safety & Security
- S Misc & Cross Mode Issues
- T Links to other Strategies/Finances/General.

The appropriate code was used wherever the comment was made. In other words a comment about buses in the open text for the Tube question would be coded with the relevant bus code.

Therefore, 'irrelevant' would only be used for a comment completely unrelated to transport.

Format of Tables on Open Responses

In this report we report on the open responses in three distinct areas:

- Open responses to Q2 of the questionnaire
- Open responses to Q4 of the questionnaire
- Open submissions.

There was a different approach used in the format of the tables for reporting these three areas as described in the box below.

Table format for tables 12-14 (Open responses to Q2 of the questionnaire)
Open responses to Q2 were only made if respondents chose to tick the 'other' option for one or more of the improvements listed. Many respondents did not do this but did tick one or more of the improvements listed. Therefore, in the analysis of these comments we present them as proportions of those who made one or more comments.
Table format for tables 22-24 (Open responses to Q4 of the questionnaire)
This approach contrasts with the analysis of the open responses to Q4 where everyone was invited to make a comment. For Q4, therefore, we present the data as proportions of all respondents.
Note on table format for tables 33-35 (Open submissions)
Table 33 for Other Organisations and Table 35 for businesses show numbers and not percentages as the sample sizes are small. In table 34 we present the data as proportions of all general public respondents who submitted an open response.

2.7 Data Processing

All open responses from the paper questionnaires were typed into a Microsoft Access database along with the postcodes.

Open responses were then spell checked. To ensure that the integrity of the response was maintained, no changes were made to the grammar or content of submissions.

The data was exported into SPSS. Range and logic error checks and data edits were undertaken. Edit checks covered multiple responses to single code questions.

Analysis was undertaken using SPSS and output was in the form of tables (SPSS for Windows analysis files and Excel).

2.8 Context to the Analysis

It is important to note that the findings reported in this document are from a consultation and not an opinion poll or referendum. A consultation is intended to seek information and views relating to the proposal and is not intended to elicit representative samples of opinion.

With consultations there can be a tendency for responses to come from those more likely to consider themselves affected and more motivated to express their views. The nature of public consultation is that respondents are self selecting and therefore not necessarily representative of opinion across London.

2.9 'Independent' Campaigns

In terms of the questionnaires or open responses (letters or emails) received for analysis, the following independent campaigns were identified.

Portobello Road Market traders

There were 31 questionnaires returned which stated the questionnaire had been handed out in Portobello Road Market.

Questionnaires from Ibero-American respondents

208 questionnaires were received from respondents at the end of the consultation which sought to highlight their ethnic origin:

- 71 had 'ibero-american', 'latino americano' or 'latina americana' written in the ethnic background question (in the English-language version of the questionnaire)
- In the translated version of the questionnaire (Spanish or Portuguese language), a new question had been added on ethnic origin, with 'Hispano o portugués hablante' replacing 'Mixed ethnic background'. 137 questionnaires were received with this option ticked. Other than that the questionnaire was the same as the consultation questionnaire except that it did not have the question on whether it was a response from an individual or a business. These responses were entered onto blank questionnaires and included in the analysis. The open responses were in English and Spanish.

Campaign for Better Transport

There were 92 emails forwarded by Campaign for Better Transport. These included a number of emails which included the same text; for example, there were 24 emails which contained the following suggestions for the MTS:⁶

- *Keeps the western extension of the congestion zone. The western extension provides vital income for Transport for London and helps reduce traffic in the city but the Mayor intends to abolish it*
- *Reverses the plan to increase bus and tube fares above inflation. The Mayor is planning to increase fares by RPI+2 every year. Keeping the western extension would help avoid such steep rises in fares*
- *Contains a target for reducing traffic. Targets for reducing traffic have been dropped but they are essential to close the gap of two million tonnes a year between what the Strategy proposes and the Mayor's target of reducing emissions by 60% by 2025. This is in line with the Committee on Climate Change's call for traffic reduction year on year*
- *Firmly commits to planning transport projects after Crossrail is completed, including expanding the tram network to provide more alternatives to the car in outer London.*

⁶ Each was treated as a separate response

Some others included a subset of these suggestions.

Other campaigns

There were 19 emails with the following text:

“Dear Boris,

Why did you institute an above inflation increase for Transport for London services for the second year running?

You appear to suggest that this is to plug a hole in Transport for London’s finances, but why then did you scrap the Western Extension of the Congestion Charge (worth £70 million a year) and why did you scrap the levy on gas guzzling vehicles (worth £50 million a year)?

Do you realise that your transport policies have resulted in the most affluent Londoners benefiting at the expense of ordinary Londoners?

Do you think that is fair?”

Each of these coordinated responses represented less than one per cent of the open responses.

3. RESPONSES – VOLUMES

Accent accepted for analysis all responses received up to 20 January 2010, those received after this date were forwarded to TfL for separate analysis.

The responses received by 20 January 2010 are shown below:

• Paper questionnaires	2,937
• On line questionnaire	2,011 ⁷
• Open responses:	
– Other organisations ⁸	55
– Businesses	24
– General public	551
Total	5,578

The 55 other organisations responses were from:

- Action Disability Kensington & Chelsea (ADKC)
- airTEXT consortium
- Barnet Labour Group
- Bexley LA21 Natural Environment Focus Group (NEFG)
- Bromley Borough Roads Action Group (BBRAG)
- Cambridge Heath and London Fields Rail Users Group
- Campaign for a Better Harrow Environment
- Cheltenham Terrace Residents Association
- Chelsea Society
- Chris Nicholson, Liberal Democrat Parliamentary Candidate for Streatham
- Chuka Umunna, Parliamentary Candidate, Streatham Labour Party
- ClientEarth
- Connect
- Croydon Mobility Forum
- Drivers Alliance
- Driver-Guides Association (DGA)
- Duncan Terrace Association
- Ealing Liberal Democrats
- Earls Court and Olympia Group (submitted by Capital and Counties and WSP Group)
- East Surrey Transport Committee
- Evolution Quarter Residents Association (EQRA)
- Friends of the North Kent Marshes
- Green Chain Working Party
- Greenwich Action to Stop Pollution (GASP)
- Greenwich and Lewisham Friends of the Earth
- HACAN ClearSkies
- Hackney and Tower Hamlets Friends of the Earth

⁷ 175 duplicates were removed

⁸ ‘Other Organisations’ are those organisations that responded to the public consultation exercise on behalf of the interests of a wider group.

- Hammersmith and Fulham Disability Forum (DF)
- Harrow Friends of the Earth
- Harrow Public Transport Users Association
- InHolborn
- Islington Living Streets
- Kensington Society
- King's Health Partners
- Lambeth Liberal Democrat Group
- Liftshare
- Loanna Morrison, PPC for Bermondsey and Old Southwark
- London Autism Rights Movement
- London Environmental Education
- London to Luton Coordination Corridor Group
- Mark Clarke Conservative Parliamentary Spokesman, Tooting
- Metropolitan Tabernacle Baptist Church
- Neasden Residents' Association
- Oxford and Cambridge Square Residents and Leaseholders Association
- Progressive London
- Redbridge Disability Association
- RSPB
- South Bank Employers' Group
- South East London Chamber of Commerce
- Southwark Living Streets
- Southwark Rail Users' Group
- Team London Bridge (London Bridge Business Improvement District (BID))
- West London Friends of the Earth
- Windsor Lines Passengers Association.
- Zac Goldsmith, PPC Richmond Park and North Kingston.

4. QUESTIONNAIRE FINDINGS

4.1 Introduction

There were 4,948 consultation questionnaires received by 20 January 2010:

- 2,937 paper questionnaires
- 2,011 online questionnaires⁹.

The findings for the consultation show analysis by response channel (whether Paper or Web questionnaire used).

The rest of the chapter is structured as follows:

Section 4.2 describes the consultation questions.

Sections 4.3-4.5 discusses Q2 'Attitudes towards a Range of Measures to improve travelling in London'

Section 4.6 discusses Q3 'Demand Management'

Section 4.7 discusses Q3 'Western Extension of the Congestion Charging Scheme'

Section 4.8 discusses Q4 'Any additional comments'

Section 4.9 discusses Q1 'questions about the respondent'.

4.2 Description of the Consultation Questions

The questionnaire contained four main questions, the first of which collected some basic demographic data about the respondent in order to both facilitate further analysis of responses and to ascertain the reach of the consultation. In Question 2, respondents were asked to identify which measures would be most benefit to travelling in London. These measures were grouped into ten broad themes, as set out below:

- Tube
- Rail
- Interchange
- Cycling
- Walking
- Buses
- Information
- Better streets
- Freight
- The Thames.

Each of these closed sub-questions was accompanied by space for the respondent to write their own additional response, if he or she wished to do so.

Question 3 sought views on two specific issues: the potential use of demand management measures, including road user charging; and the proposed removal of the Western Extension of the Congestion Charging Zone, both of which were included as

⁹ 175 duplicates were removed

proposals in the draft MTS for public consultation. For each, respondents were asked how far they agreed with the proposal. It may be useful to provide some context to these proposals in order to better understand the analysis of question responses that follows, and to set out the potential next steps, following the Mayor's consideration of the responses to the consultation.

Demand Management

The first sub-question of Question 3 concerns Proposal 129 of the public draft MTS, which states that the Mayor may consider managing the demand for travel through pricing incentives in order to meet the overall objectives of the transport strategy. These pricing incentives may include, for example, a fair system of road user charging. It is important to note here that this proposal, and the question included in the public questionnaire, does **not** relate to a specific potential road user charging scheme. Both in the draft MTS, and in subsequent comments concerning the proposal (for example, in his Letter to the Chair of the London Assembly of October 2009), the Mayor has stated that these measures would only be considered if the other measures at the Mayor's disposal were deemed insufficient to meet the objectives set out in the Strategy, and that there would need to be a balance between the objectives of any such scheme and its impacts. Only at this point would a specific scheme be developed and consulted on. The first sub-question in Question 3, then, is intended to seek views on demand management **in principle**, not on a specific charging scheme. It is particularly important to understand this in the context of the second part of Question 3, which does concern a specific proposal, and which is described below.

The Western Extension of the Congestion Charging Zone (WEZ)

The Mayor of London, Boris Johnson, made a commitment in his election manifesto to consult on the future of the Western Extension. In autumn 2008, TfL carried out an *informal* consultation on this matter on behalf of the Mayor. The majority of the public and businesses who responded to this informal consultation supported the removal of the Western Extension (69% overall; with 67% of members of the public and 86% of business respondents selecting this option). Following this informal consultation the Mayor announced that he was minded to remove the WEZ and would begin the statutory processes needed in order to do this. But while the informal consultation provided an opportunity for the Mayor to hear Londoners' views on the future of the WEZ, it was made clear at the time that any subsequent change to the scheme would be subject to further statutory processes. Firstly, any proposed variation to the central London Congestion Charging Scheme must be in conformity with the Mayor's Transport Strategy (MTS). The Strategy which applied at the time of the informal consultation (and continues to apply), states that there will be a Western Extension. Hence, any future removal of the WEZ would require a modification to the Mayor's Transport Strategy. The public draft of the MTS which has just undergone public consultation therefore included a proposal (Proposal 127) to remove the WEZ, subject to the outcome of the consultation. The second sub-question in Question 3 is intended to help inform the Mayor's decision on this matter, by inviting respondents to state how far they agree or disagree with the proposal.

Should the Mayor decide, following this MTS consultation, to proceed with the proposal to remove the WEZ, there would need to be a further stage of public and stakeholder consultation on a draft Variation Order (VO) for the Congestion Charging

Scheme. This consultation could not take place until a revised MTS is in place, so that the changes proposed within the VO would be in conformity with the overarching Transport Strategy.

4.3 Analysis of Q2: Attitudes towards a Range of Measures to Improve Travelling in London

In Question 2, respondents were asked to tick measures that they considered would bring most benefit from a list of measures under the following headings:

- Tube
- Rail
- Interchange
- Cycling
- Walking
- Buses
- Information
- Better streets
- Freight
- The Thames.

Each of these had between three and five measures as well as an ‘other’ category which invited respondents to state another measure or measures. Respondents could tick as many measures as they wished – or, indeed, none. In the following charts, therefore, percentages will usually add up to more than 100%.

The question heading was:

Q2 Transport for London is proposing a range of measures to improve travelling in London. For each aspect listed below please tick all those that you consider would bring most benefit:

Tube

There were six measures in the Tube section:

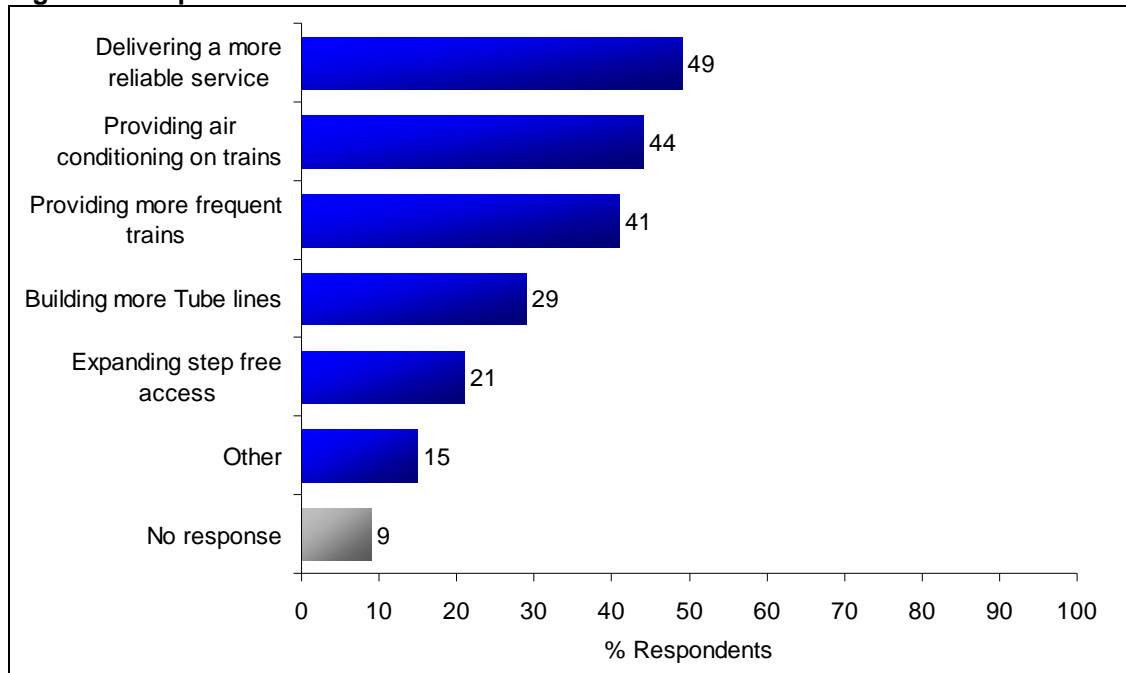
- Providing air conditioning on trains
- Expanding step free access
- Building more Tube lines
- Providing more frequent trains
- Delivering a more reliable service
- Other (please specify) ¹⁰.

The measure which gained most support was ‘Delivering a more reliable service’ with nearly half (49%) of the total consultation respondents ticking it.

¹⁰ This had a free text box next to it

‘Providing air conditioning on trains’ (44%) and ‘Providing more frequent trains’ (41%) also gained high levels of support. ‘Expanding step free access’ with 21% gained the least support. See Figure 3.

Figure 3: Responses to section on Tube



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Tube Section: 96% compared to 88%.

There were similar levels of support for the different measures in the Tube section by response channel. The main differences were:

- Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick ‘Providing air conditioning on trains’: 48% compared to 42%
- Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick ‘Building more Tube lines’: 36% compared to 25%

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick ‘Other’: 20% compared to 11%.

Table 1: Responses to section on Tube by response channel

	Total %	Response channel	
		Web %	Paper %
No response	9	4	12
Delivering a more reliable service	49	50	49
Providing air conditioning on trains	44	48	42
Providing more frequent trains	41	41	40
Building more Tube lines	29	36	25
Expanding step free access	21	21	20
Other	15	20	11
Base (all questionnaire respondents)	4,948	2,011	2,937

Rail

There were six measures in the Rail section:

- Enabling passengers to use Oyster pay as you go across all rail in London
- Providing more capacity on the DLR and Tramlink
- Building more rail lines
- Improving the cleanliness, security and quality of suburban rail stations
- Creating an improved service for Inner and Outer London
- Other (please specify)¹¹.

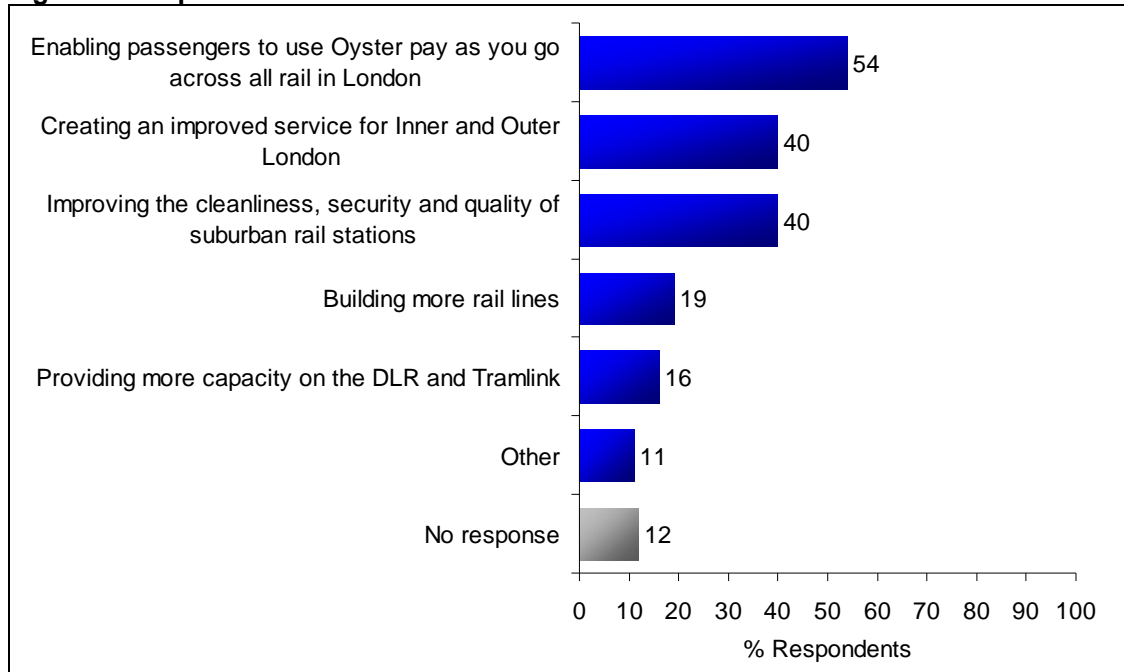
The measure which gained most support was ‘Enabling passengers to use Oyster pay as you go across all rail in London’ with over half (54%) of the total consultation respondents ticking it.

Four tenths ticked both ‘Creating an improved service for Inner and Outer London’ and ‘Improving the cleanliness, security and quality of suburban rail stations’.

‘Providing more capacity on the DLR and Tramlink’ with 16% gained the least support. See Figure 4.

¹¹ This had a free text box next to it

Figure 4: Responses to section on Rail



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Rail Section: 93% compared to 84%.

There were similar levels of support for the different measures in the Rail section by response channel. The main differences were:

- Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick ‘Enabling passengers to use Oyster pay as you go across all rail in London’: 65% compared to 46%
- Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick ‘Creating an improved service for Inner and Outer London’: 45% compared to 37%

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick ‘Other’: 15% compared to 9%.

Table 2: Responses to section on Rail by response channel

	Total %	Response channel	
		Web %	Paper %
No response	12	7	16
Enabling passengers to use Oyster pay as you go across all rail in London	54	65	46
Creating an improved service for Inner and Outer London	40	45	37
Improving the cleanliness, security and quality of suburban rail stations	40	41	39
Building more rail lines	19	19	20
Providing more capacity on the DLR and Tramlink	16	16	16
Other	11	15	9
Base (all questionnaire respondents)	4,948	2,011	2,937

Interchange

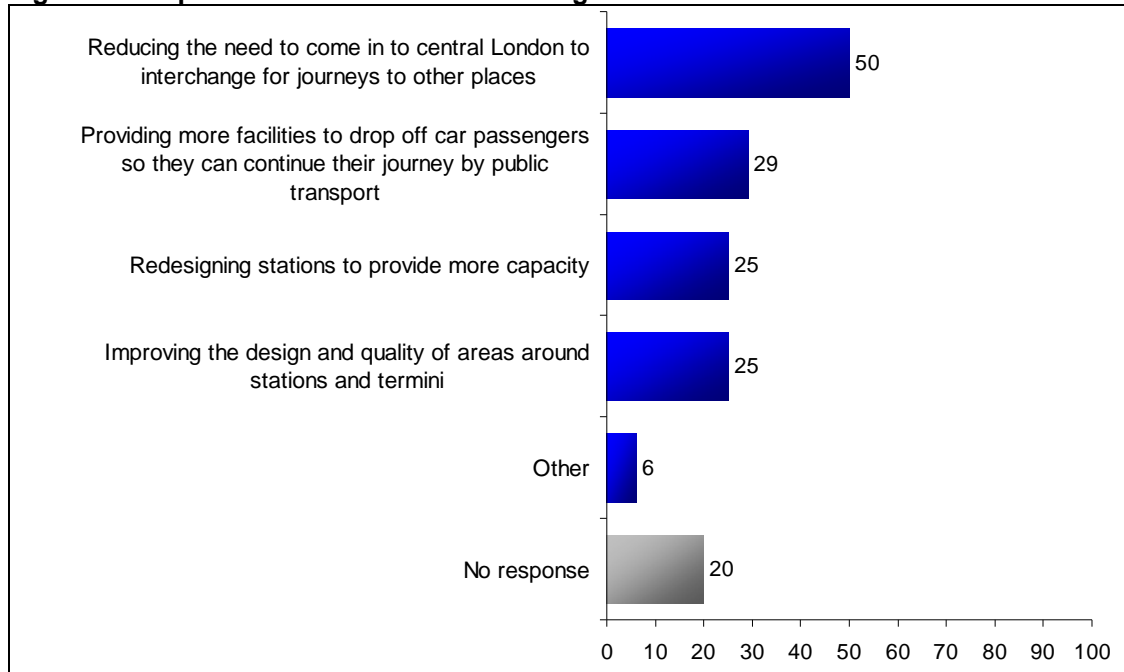
There were five measures in the Interchange section:

- Reducing the need to come in to central London to interchange for journeys to other places
- Improving the design and quality of areas around stations and termini
- Redesigning stations to provide more capacity
- Providing more facilities to drop off car passengers so they can continue their journey by public transport
- Other (please specify)¹².

The measure which gained most support was ‘Reducing the need to come in to central London to interchange for journeys to other places’ with half of the total consultation respondents ticking it. The other three measures gained similar and much lower levels of support. See Figure 5.

¹² This had a free text box next to it

Figure 5: Responses to section on Interchange



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Interchange Section: 87% compared to 75%.

There were similar levels of support for the different measures in the Interchange section by response channel. The main difference was that respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick ‘Reducing the need to come in to central London to interchange for journeys to other places’: 59% compared to 43%.

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick ‘Other’: 9% compared to 4%.

Table 3: Responses to section on Interchange by response channel

	Total %	Response channel	
		Web %	Paper %
No response	20	13	25
Reducing the need to come in to central London to interchange for journeys to other places	50	59	43
Providing more facilities to drop off car passengers so they can continue their journey by public transport	29	30	28
Redesigning stations to provide more capacity	25	27	23
Improving the design and quality of areas around stations and termini	25	27	24
Other	6	9	4
Base (all questionnaire respondents)	4,948	2,011	2,937

Cycling

There were five measures in the Cycling section:

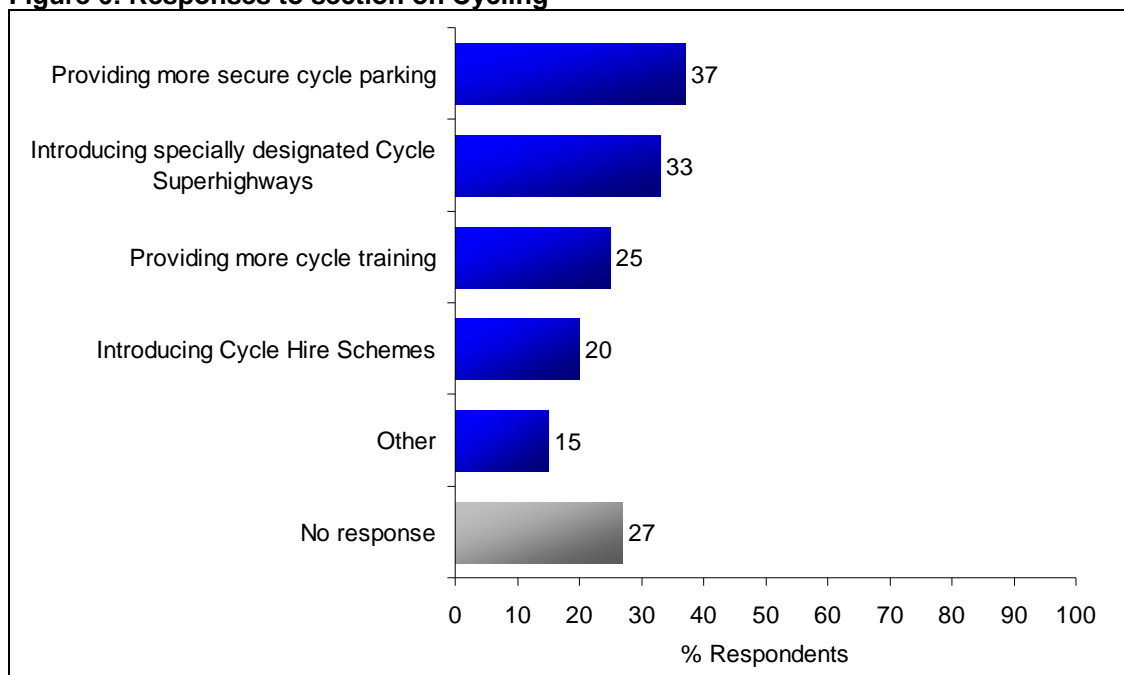
- Providing more secure cycle parking
- Introducing specially designated Cycle Superhighways
- Introducing Cycle Hire Schemes
- Providing more cycle training
- Other (please specify)¹³.

The measure which gained most support was 'Providing more secure cycle parking' with 37% of the total consultation respondents ticking it.

A third ticked 'Introducing specially designated Cycle Superhighways' and a quarter ticked 'Providing more cycle training'.

'Introducing Cycle Hire Schemes' was ticked by 20% and gained the least support. See Figure 6.

Figure 6: Responses to section on Cycling



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Cycling Section: 83% compared to 66%.

Respondents using the paper questionnaire were more likely than respondents using the Web questionnaire to tick 'Providing more cycle training': 28% compared to 22%. The other three measures were more likely to be supported by respondents using the Web questionnaire.

¹³ This had a free text box next to it

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick 'Other': 22% compared to 11%.

Table 4: Responses to section on Cycling by response channel

	Total %	Response channel	
		Web %	Paper %
No response	27	17	34
Providing more secure cycle parking	37	44	32
Introducing specially designated Cycle Superhighways	33	44	26
Providing more cycle training	25	22	28
Introducing Cycle Hire Schemes	20	25	16
Other	15	22	11
Base (all questionnaire respondents)	4,948	2,011	2,937

Walking

There were six measures in the Walking section:

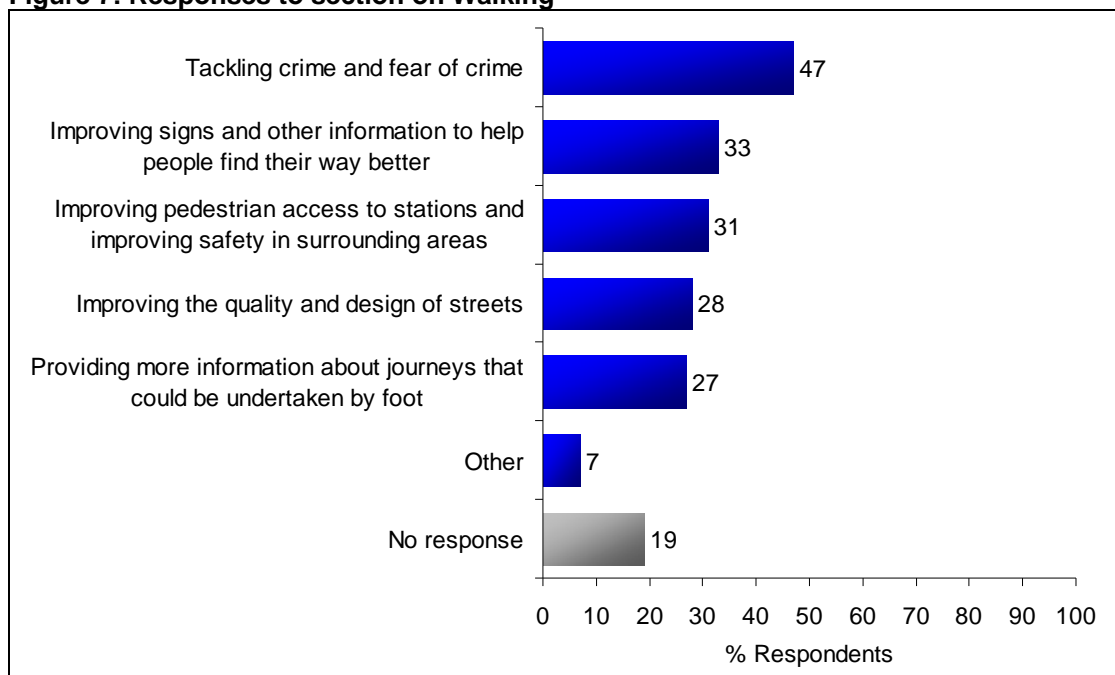
- Providing more information about journeys that could be undertaken by foot
- Improving the quality and design of streets
- Improving signs and other information to help people find their way better
- Tackling crime and fear of crime
- Improving pedestrian access to stations and improving safety in surrounding areas
- Other (please specify)¹⁴.

The measure which gained most support was 'Tackling crime and fear of crime' with nearly half (47%) of the total consultation respondents ticking it.

The other four measures gained similar levels of support with between 33% and 27% each. See Figure 7.

¹⁴ This had a free text box next to it

Figure 7: Responses to section on Walking



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Walking Section: 87% compared to 77%.

There were similar levels of support for the different measures in the Walking section by response channel. The main differences were:

- Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick ‘Improving the quality and design of streets’: 33% compared to 25%
- Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick ‘Improving signs and other information to help people find their way better’: 38% compared to 30%.

Table 5: Responses to section on Walking by response channel

	Total %	Response channel	
		Web %	Paper %
No response	19	13	23
Tackling crime and fear of crime	47	47	47
Improving signs and other information to help people find their way better	33	38	30
Improving pedestrian access to stations and improving safety in surrounding areas	31	32	29
Improving the quality and design of streets	28	33	25
Providing more information about journeys that could be undertaken by foot	27	29	26
Other	7	8	6
Base (all questionnaire respondents)	4,948	2,011	2,937

Buses

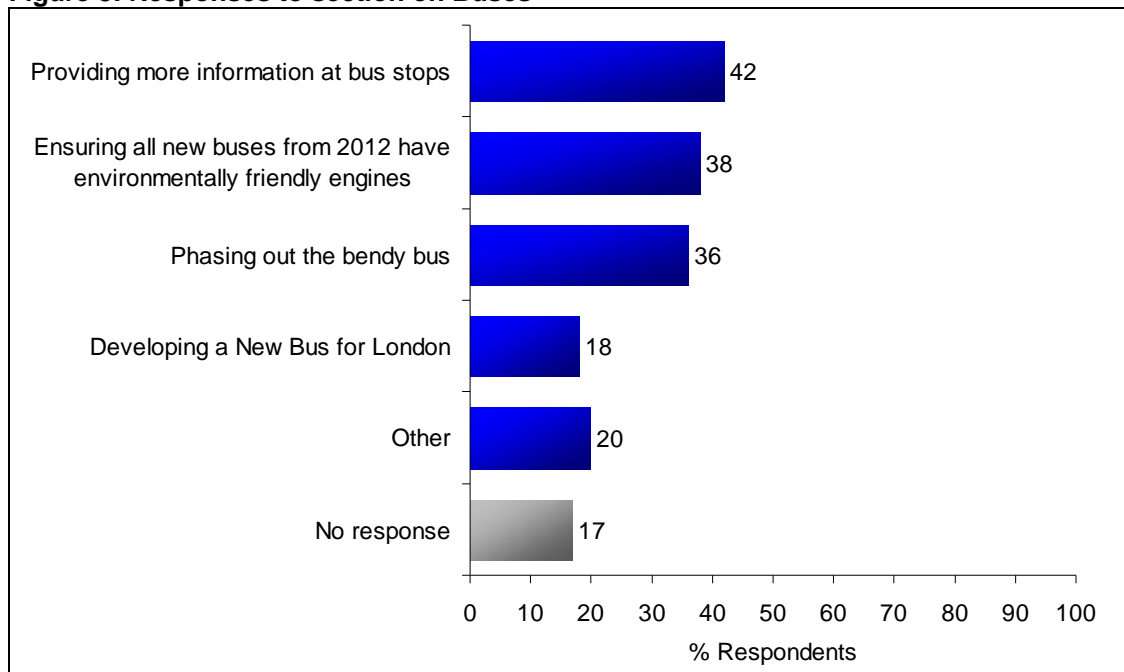
There were five measures in the Buses section:

- Providing more information at bus stops
- Developing a New Bus for London
- Phasing out the bendy bus
- Ensuring all new buses from 2012 have environmentally friendly engines
- Other (please specify)¹⁵.

The top three measures gained similar levels of support. 42% ticked 'Providing more information at bus stops', 38% ticked 'Ensuring all new buses from 2012 have environmentally friendly engines' and 36% ticked 'Phasing out the bendy bus'.

'Developing a New Bus for London' with 18% gained the least support. See Figure 8.

Figure 8: Responses to section on Buses



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were much more likely than respondents using the paper questionnaire to tick one or more measures in the Buses Section: 92% compared to 77%.

There were similar levels of support between the web and paper response channels for the following three measures in the Buses section by response channel: 'Providing more information at bus stops', 'Ensuring all new buses from 2012 have environmentally friendly engines' and 'Phasing out the bendy bus.'

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick the other two measures:

¹⁵ This had a free text box next to it

- ‘Providing more information at bus stops’: 50% compared to 37%
- ‘Ensuring all new buses from 2012 have environmentally friendly engines’: 43% compared to 34%

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick ‘Other’: 28% compared to 15%.

Table 6: Responses to section on Buses by response channel

	Total %	Response channel	
		Web %	Paper %
No response	17	8	23
Providing more information at bus stops	42	50	37
Ensuring all new buses from 2012 have environmentally friendly engines	38	43	34
Phasing out the bendy bus	36	37	35
Developing a New Bus for London	18	20	17
Other	20	28	15
Base (all questionnaire respondents)	4,948	2,011	2,937

Information

There were six measures in the Information section:

- Providing travel planning and guidance to assist people in deciding how to travel
- Enhancing the provision of up to the minute information, for instance online and by text message
- Improving the travel information assistance provided at stations
- Introducing journey planning tools which are focused on specific areas, eg town centres
- Building consistent signage and information for cyclists and pedestrians
- Other (please specify)¹⁶.

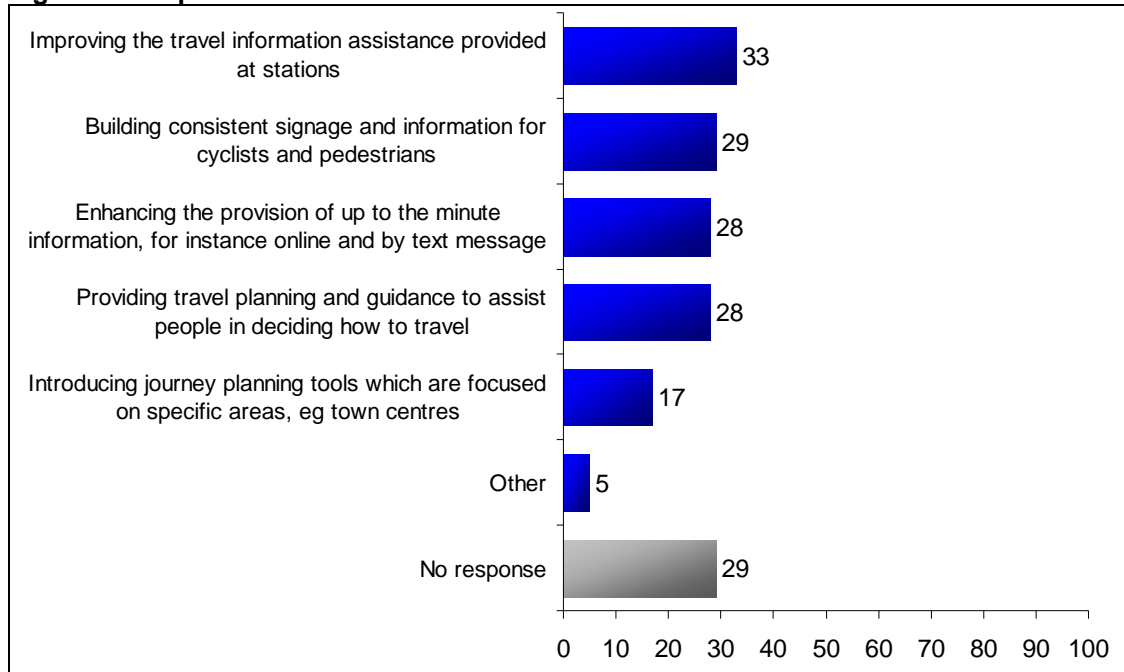
The measure which gained most support was ‘Improving the travel information assistance provided at stations’ with a third of the total consultation respondents ticking it.

The next three measures gained very similar levels of support (between 28% and 29%).

‘Introducing journey planning tools which are focused on specific areas, eg town centres’ with 17% gained the least support. See Figure 9.

¹⁶ This had a free text box next to it

Figure 9: Responses to section on Information



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Information Section: 82% compared to 63%.

Respondents using the Web questionnaire gave higher levels of support to all the different measures in the Information section than respondents using the paper questionnaire, particularly for:

- ‘Enhancing the provision of up to the minute information, for instance online and by text message’: 41% compared to 20%
- ‘Building consistent signage and information for cyclists and pedestrians’: 34% compared to 25%.

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick ‘Other’: 7% compared to 4%.

Table 7: Responses to section on Information by response channel

	Total %	Response channel	
		Web %	Paper %
No response	29	18	37
Improving the travel information assistance provided at stations	33	37	30
Building consistent signage and information for cyclists and pedestrians	29	34	25
Enhancing the provision of up to the minute information, for instance online and by text message	28	41	20
Providing travel planning and guidance to assist people in deciding how to travel	28	31	26
Introducing journey planning tools which are focused on specific areas, eg town centres	17	21	15
Other	5	7	4
Base (all questionnaire respondents)	4,948	2,011	2,937

Better Streets

There were five measures in the Better Streets section:

- Encouraging the uptake of low emission vehicles
- Removing unnecessary signage and clutter
- Introducing shared space schemes to improve the look and feel of streets and make them safer
- Using high quality and attractive materials for pavements and streets
- Other (please specify)¹⁷.

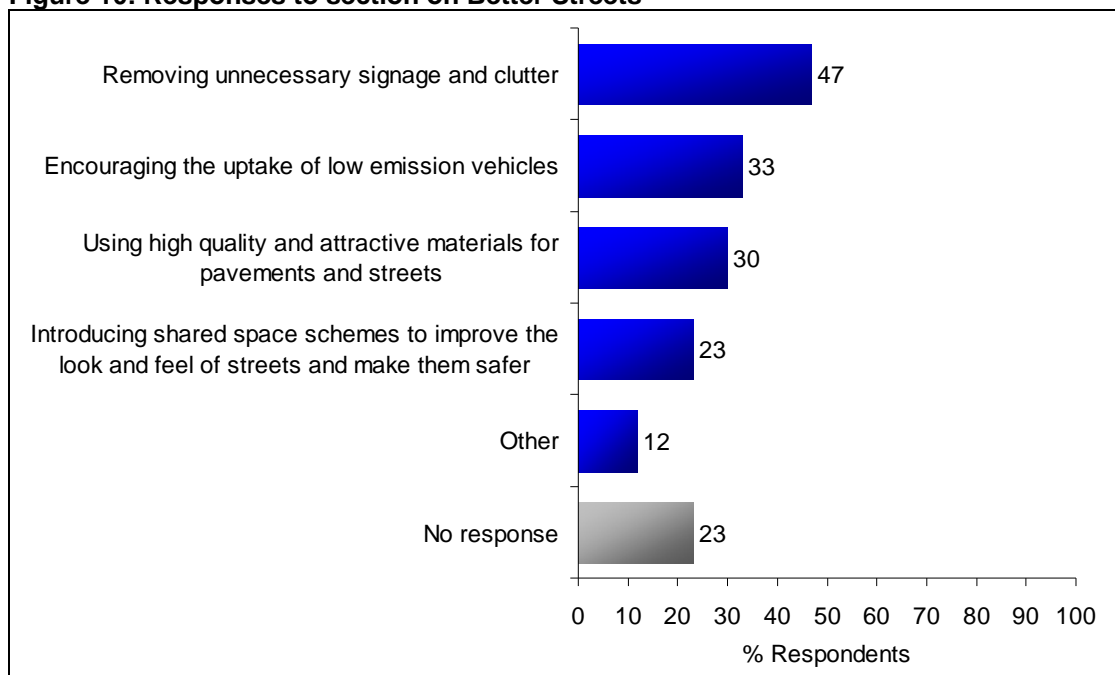
The measure which gained most support was ‘Removing unnecessary signage and clutter’ with nearly half (47%) of the total consultation respondents ticking it.

A third ticked both ‘Encouraging the uptake of low emission vehicles’ and 30% ticked ‘Using high quality and attractive materials for pavements and streets’.

‘Introducing shared space schemes to improve the look and feel of streets and make them safer’ with 23% gained the least support. See Figure 10.

¹⁷ This had a free text box next to it

Figure 10: Responses to section on Better Streets



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Better Streets Section: 88% compared to 69%.

Respondents using the Web questionnaire gave higher levels of support to all the different measures in the Better Streets section than respondents using the paper questionnaire, particularly for:

- ‘Removing unnecessary signage and clutter’: 57% compared to 40%
- ‘Introducing shared space schemes to improve the look and feel of streets and make them safer’: 29% compared to 19%.

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick ‘Other’: 17% compared to 9%.

Table 8: Responses to section on Better Streets by response channel

	Total %	Response channel	
		Web %	Paper %
No response	23	12	31
Removing unnecessary signage and clutter	47	57	40
Encouraging the uptake of low emission vehicles	33	37	30
Using high quality and attractive materials for pavements and streets	30	36	27
Introducing shared space schemes to improve the look and feel of streets and make them safer	23	29	19
Other	12	17	9
Base (all questionnaire respondents)	4,948	2,011	2,937

Freight

There were four measures in the Freight section:

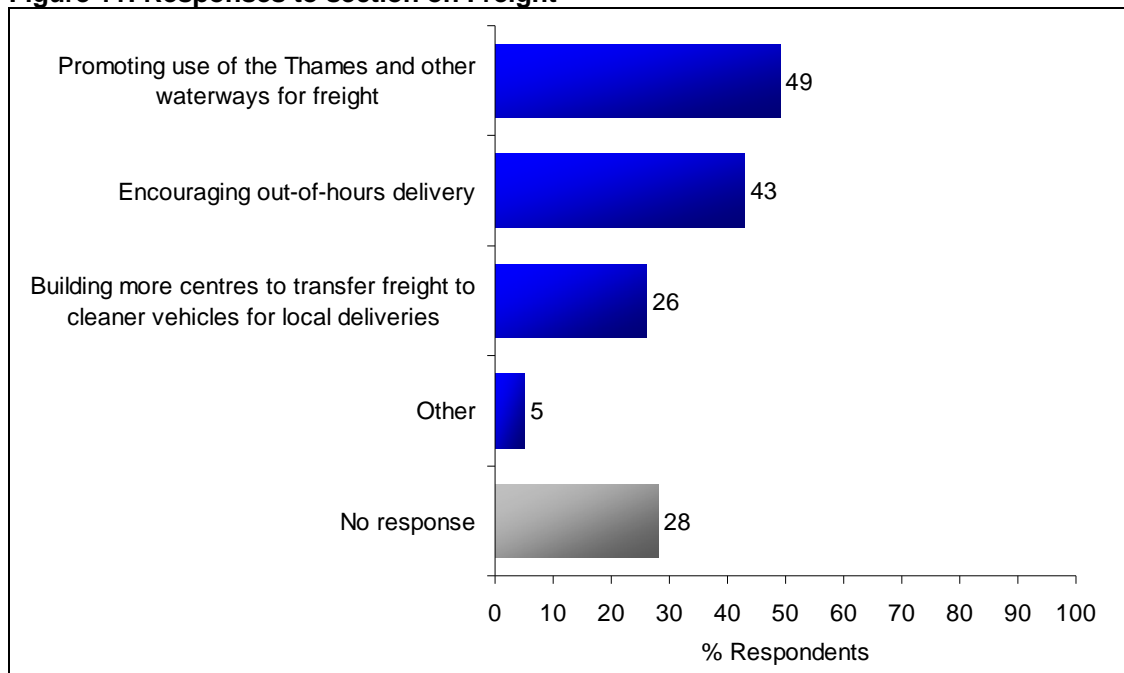
- Promoting use of the Thames and other waterways for freight
- Encouraging out-of-hours delivery
- Building more centres to transfer freight to cleaner vehicles for local deliveries
- Other (please specify)¹⁸.

The measure which gained most support was ‘Promoting use of the Thames and other waterways for freight’ with nearly half (49%) of the total consultation respondents ticking it.

Over four tenths (43%) ticked ‘Encouraging out-of-hours delivery’.

‘Building more centres to transfer freight to cleaner vehicles for local deliveries’ with 26% gained the least support. See Figure 11.

Figure 11: Responses to section on Freight



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in the Freight Section: 82% compared to 65%.

Respondents using the Web questionnaire gave higher levels of support to all the different measures in the Freight section than respondents using the paper questionnaire, particularly for ‘Promoting use of the Thames and other waterways for freight’: 59% compared to 43%.

¹⁸ This had a free text box next to it

Respondents using the Web questionnaire were also more likely than respondents using the paper questionnaire to tick 'Other': 7% compared to 4%.

Table 9: Responses to section on Freight by response channel

	Total %	Response channel	
		Web %	Paper %
No response	28	18	35
Promoting use of the Thames and other waterways for freight	49	59	43
Encouraging out-of-hours delivery	43	48	40
Building more centres to transfer freight to cleaner vehicles for local deliveries	26	31	23
Other	5	7	4
Base (all questionnaire respondents)	4,948	2,011	2,937

The Thames

There were five measures in The Thames section:

- Introducing Oyster on passenger services
- Raising service standards and making them consistent with other public transport
- Introducing more stops
- Providing more environmentally friendly boats
- Other (please specify)¹⁹.

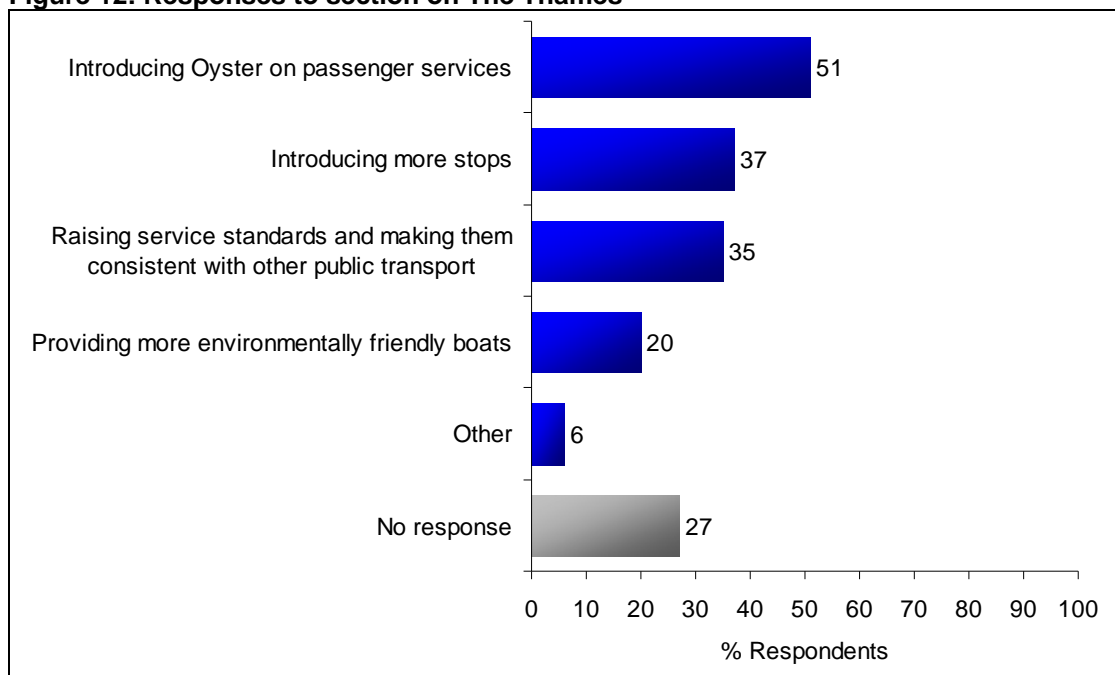
The measure which gained most support was 'Introducing Oyster on passenger services' with over half (51%) of the total consultation respondents ticking it.

Similar proportions ticked 'Introducing more stops' (37%) and 'Raising service standards and making them consistent with other public transport' (35%).

'Providing more environmentally friendly boats' with 20% gained the least support. See Figure 12.

¹⁹ This had a free text box next to it

Figure 12: Responses to section on The Thames



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire were more likely than respondents using the paper questionnaire to tick one or more measures in The Thames Section: 82% compared to 66%.

There were similar levels of support for one measure in The Thames section by response channel: 'Providing more environmentally friendly boats'.

Respondents using the Web questionnaire gave higher levels of support to three other measures in The Thames section than respondents using the paper questionnaire, particularly:

- 'Introducing Oyster on passenger services': 61% compared to 44%
- 'Introducing more stops': 45% compared to 32%
- 'Raising service standards and making them consistent with other public transport': 41% compared to 31%.

Table 10: Responses to section on The Thames by response channel

	Total %	Response channel	
		Web %	Paper %
No response	27	18	34
Introducing Oyster on passenger services	51	61	44
Introducing more stops	37	45	32
Raising service standards and making them consistent with other public transport	35	41	31
Providing more environmentally friendly boats	20	21	20
Other	6	7	6
Base (all questionnaire respondents)	4,948	2,011	2,937

4.4 Overview of Responses to Question 2

Response rate by section

The section of Question 2 which had the highest proportion giving one or more answers was Tube, followed by rail, buses and walking. The sections which attracted least responses were Freight and Information. The list below shows the proportion giving one or more answers to each section, sorted in descending order of response level.

	Total	Web	Paper
	%	%	%
• Tube	91	96	88
• Rail	88	93	84
• Buses	83	92	77
• Walking	81	87	77
• Interchange	80	87	75
• Better streets	77	88	69
• Cycling	73	83	66
• The Thames	73	82	66
• Freight	72	82	65
• Information	71	82	63

For all sections, respondents using the Web questionnaire were more likely to answer each section than respondents using the paper questionnaire.

Analysis of response by age group showed little difference by age group except for two sections: cycling and The Thames where the response from the 65+ age group was notably lower than for the other age groups:

- 72% of those aged 65+ years old gave one or more answers in the Cycling section compared to between 77% and 81% for the other age groups
- 75% of those aged 65+ years old gave one or more answers in The Thames section compared to between 80% and 81% for the other age groups

Numbers of Sections Responded to

An analysis of how many of the ten sections in Q2 were answered shows that, overall, nearly half the sample (48%) answered all ten sections, whereas 7% did not answer any. The distribution of sections answered is shown below.

	Total	Web	Paper
	%	%	%
• All 10 sections	48	59	40
• 9 sections	14	16	13
• 8 sections	9	9	9
• 7 sections	6	5	6
• 6 sections	6	3	7
• 5 sections	4	2	5
• 4 sections	3	2	4
• 3 sections	2	1	3
• 2 sections	1	1	1
• 1 section	1	1	1
• No sections	7	2	10

Top 25 Measures

Across all ten sections of Q2 the most ticked measure was ‘Enabling passengers to use Oyster pay as you go across all rail in London’ with 54%. Below we show the top 25 measures in Q2 along with the sections they are in.

Table 11: Top 25 measures

Section	Category	%²⁰
Rail	Enabling passengers to use Oyster pay as you go across all rail in London	54
The Thames	Introducing Oyster on passenger services	51
Interchange	Reducing the need to come in to central London to interchange for journeys to other places	50
Tube	Delivering a more reliable service	49
Freight	Promoting use of the Thames and other waterways for freight	49
Walking	Tackling crime and fear of crime	47
Better streets	Removing unnecessary signage and clutter	47
Tube	Providing air conditioning on trains	44
Freight	Encouraging out-of-hours delivery	43
Buses	Providing more information at bus stops	42
Tube	Providing more frequent trains	41
Rail	Improving the cleanliness, security and quality of suburban rail stations	40
Rail	Creating an improved service for Inner and Outer London	40
Buses	Ensuring all new buses from 2012 have environmentally friendly engines	38
Cycling	Providing more secure cycle parking	37
The Thames	Introducing more stops	37
Buses	Phasing out the bendy bus	36
The Thames	Raising service standards and making them consistent with other public transport	35

²⁰ Proportions are of respondents

Cycling	Introducing specially designated Cycle Superhighways	33
Walking	Improving signs and other information to help people find their way better	33
Information	Improving the travel information assistance provided at stations	33
Better streets	Encouraging the uptake of low emission vehicles	33
Walking	Improving pedestrian access to stations and improving safety in surrounding areas	31
Better streets	Using high quality and attractive materials for pavements and streets	30
Tube	Building more Tube lines	29

4.5 Open Responses to Question 2

As can be seen from the preceding tables, each sub section within Question 2 included a space for the respondent to describe an improvement not listed in the options, using a free text box. These open responses were coded to the code frame (which is at Appendix B). The main comments (representing 2% or more of all respondents who made one or more comments) are shown below for the overall sample by response channel (Table 12) and by whether individual (Table 13) or business (Table 14). These tables show the code reference (eg T3) and the code descriptions. The code reference is made up of a letter which represents a theme (described in Section 2.6) and a number.

It should be noted that most respondents did not make comments in this section. Overall 61% did not make any comments (47% of Web and 71% of paper questionnaire respondents).

<p>Note on table format for tables 12-14</p> <p>Open responses to Q2 were only made if respondents chose to tick the 'other' option for one or more of the improvements listed. Many respondents did not do this but did tick one or more of the improvements listed. Therefore, in the analysis of these comments we present them as proportions of those who made one or more comments.</p> <p>This approach contrasts with the analysis of the open responses to Q4 where everyone was invited to make a comment. For Q4, therefore, we present the data as proportions of all respondents.</p>

Just under a quarter (23%) of those who made one or more comments made a comment on 'Fares and ticketing'. Bus service/route issues were raised by 16%. Other issues with respect to Better Streets/Roads²¹ and other issues with respect to Buses were mentioned by 15% and 14% of people who made one or more comments respectively.

Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road was raised by 14% of people who completed a text box in Question 2.

²¹ ie single issues not covered in the code frame

Table 12: Other comments by response channel²²

	Total %	Web %	Paper %
T3 Fares and ticketing	23	23	22
F1 Bus Service/route issues	16	17	14
H7 Other (Better Streets/Roads)	15	16	13
F4 Other (Buses)	14	12	17
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	14	12	16
D7 Other (Cycling)	11	10	12
A6 Other (Tube)	11	10	11
D6 Changes to road layout for cycling (cycle lanes, one way sts, gyratories etc)	9	10	8
F3 Bus design inc New Bus, Bendy Bus	9	9	8
G4 Other (Information)	8	6	11
P2 Physical accessibility improvements, e.g. step-free tube, bus ramps	7	6	9
B11 Other (Rail)	7	6	7
H6 Making changes to how different road users use the road/road space allocation (e.g. bus, cycle lanes)	7	8	5
J5 Other Thames/waterways/ River Crossing comment	6	6	7
Q3 Road Safety	6	6	6
H1 Parking	5	8	3
B2 Increased rail capacity	5	6	4
H5 Improving the appearance of streets	5	4	8
Q2 Public Transport Safety (general)	5	5	6
G3 Providing travel planning and guidance to assist people in deciding how to travel	5	5	5
I5 Rail freight	5	5	5
C4 Integrating London's transport system and services	5	5	4
E5 Other (Walking)	5	4	6
A1 More reliable/longer hours tube service	5	5	4
I6 Other (Freight)	4	4	5
F2 iBus and information provision	4	3	6
C5 Other (Interchange)	4	4	4
A2 Improvements to tube stations/staffing	4	3	6
Q5 Other crime, safety comment	4	5	3
A4 Tube line extensions	3	3	3
B1 Improved service levels (staffing, clean, secure)	3	1	4
H4 Shared space/better streets	3	3	2
G1 Providing consistent signage and information for cyclists and pedestrians (inc Legible London)	2	2	3
G2 Enhancing the provision of live information about transport (eg online and text message)	2	2	3
D1 Cycle parking	2	3	1
Q1 Reducing crime and fear of crime in and around transport	2	2	2
H3 Roadworks (Permits, lane rental, control of)	2	2	2
A3 Tube frequency/capacity	2	1	3
D8 Introduce a compulsory license scheme for cyclists	2	2	2
I1 Delivery hours and loading issues	2	1	2
T2 Financing transport schemes	2	3	1
O4 Comment on Congestion Charge generally	2	3	0
P6 Concessionary fares	2	2	2
H2 Smoothing traffic flow	2	2	1
Other (sum of where proportion was less than 2%)	34	36	32
Irrelevant	6	5	8
Base (respondents who made one or more comments)	1,909	1,064	845
Proportion of respondents who made no comment	61%	47%	71%

²² Proportions are of respondents who made comments

Individuals

Since individuals make up a large proportion of all comments²³ the comments from individuals are very similar to those for the overall sample.

Table 13: Other comments – individuals²⁴

	Total %
T3 Fares and ticketing	22
F1 Bus Service/route issues	16
H7 Other (Better Streets/Roads)	15
F4 Other (Buses)	15
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	14
D7 Other (Cycling)	11
A6 Other (Tube)	11
D6 Changes to road layout for cycling (cycle lanes, one way sts, gyratories etc)	9
F3 Bus design inc New Bus, Bendy Bus	9
G4 Other (Information)	8
P2 Physical accessibility improvements, e.g. step-free tube, bus ramps	7
H6 Making changes to how different road users use the road/road space allocation (eg bus, cycle lanes)	7
B11 Other (Rail)	7
J5 Other Thames/waterways/ River Crossing comment	7
Q3 Road Safety	6
B2 Increased rail capacity	6
H5 Improving the appearance of streets	5
Q2 Public Transport Safety (general)	5
G3 Providing travel planning and guidance to assist people in deciding how to travel	5
E5 Other (Walking)	5
I5 Rail freight	5
A1 More reliable/longer hours tube service	5
F2 iBus and information provision	5
C4 Integrating London's transport system and services	5
H1 Parking	4
A2 Improvements to tube stations/staffing	4
C5 Other (Interchange)	4
I6 Other (Freight)	4
Q5 Other crime, safety comment	4
A4 Tube line extensions	3
B1 Improved service levels (staffing, clean, secure)	3
H4 Shared space/better streets	2
G1 Providing consistent signage and information for cyclists and pedestrians (inc Legible London)	2
D1 Cycle parking	2
G2 Enhancing the provision of live information about transport (eg online and text message)	2
H3 Roadworks (Permits, lane rental, control of)	2
Q1 Reducing crime and fear of crime in and around transport	2
A3 Tube frequency/capacity	2
T2 Financing transport schemes	2
I1 Delivery hours and loading issues	2
D8 Introduce a compulsory license scheme for cyclists	2
H2 Smoothing traffic flow	2
P6 Concessionary fares	2
Other (sum of where proportion was less than 2%)	34
Irrelevant	5
Base (individuals who made one or more comments)	1,699
Proportion of respondents who made no comment	54%

²³ 74% of those who answered whether they responded as an individual or a business

²⁴ Proportions are of respondents who made comments

Businesses

A quarter of business comments were about physical accessibility improvements, eg step-free tube, bus ramps. 18% made a comment on fares and ticketing.

Table 14: Other comments – businesses²⁵

	Total %
P2 Physical accessibility improvements, e.g. step-free tube, bus ramps	25
T3 Fares and ticketing	18
D7 Other (Cycling)	17
H7 Other (Better Streets/Roads)	15
G4 Other (Information)	14
B11 Other (Rail)	14
F1 Bus Service/route issues	12
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	12
F3 Bus design inc New Bus, Bendy Bus	11
N6 Low carbon infrastructure/tech	11
A6 Other (Tube)	9
Q2 Public Transport Safety (general)	9
N7 Electric vehicles	9
F4 Other (Buses)	8
J5 Other Thames/waterways/ River Crossing comment	8
Q3 Road Safety	8
I6 Other (Freight)	8
E5 Other (Walking)	6
D6 Changes to road layout for cycling (cycle lanes, one way streets, gyratories etc)	5
B2 Increased rail capacity	5
H5 Improving the appearance of streets	5
I5 Rail freight	5
C4 Integrating London's transport system and services	5
G1 Providing consistent signage and information for cyclists and pedestrians (inc Legible London)	5
J4 River crossings	5
E2 Pedestrian access to PT and safety	5
H6 Making changes to how different road users use the road/road space allocation (eg bus, cycle lanes)	3
G3 Providing travel planning and guidance to assist people in deciding how to travel	3
A1 More reliable/longer hours tube service	3
C5 Other (Interchange)	3
B1 Improved service levels (staffing, clean, secure)	3
G2 Enhancing the provision of live information about transport (eg online and text message)	3
D8 Introduce a compulsory license scheme for cyclists	3
J1 Piers/ Wharves/Sea Ports/stopping points	3
Other (sum of where proportion was less than 2%)	37
Irrelevant	20
Base (businesses who made one or more comments)	65
Proportion of respondents who made no comment	68%

²⁵ Proportions are of respondents who made comments

Analysis by Theme

The code frame was organised into thematic sections (See Section 2.6). The sections which gained the highest proportions of distinct comments are Buses, Cycling and Better Streets and Roads:

• Buses	43% ²⁶
• Cycling	40%
• Better Streets and Roads	38%
• Links to other Strategies/ Finances/General	27%
• Tube/London Underground	25%
• Rail (incl. National Rail services, TfL Overground, DLR and Tramlink)	21%
• Information	18%
• Crime, Safety & Security	17%
• Freight	14%
• Interchange	11%
• Accessibility	10%
• Thames/River Crossings/Blue Ribbon Network	9%
• Walking	8%
• Environment, Air Quality & Climate Change (CO ₂)	5%
• Misc & Cross Mode Issues	4%
• Western Extension of Congestion Charge and Low Emission Zone	2%
• Demand Management/Road User Charging	2%
• Airports/access to airports	*
• Taxis, private hire and coaches	*

* = less than 0.5%

4.6 Demand Management

Q3 Additionally, there are some particular issues we would like your opinion on; please consider the following two questions:

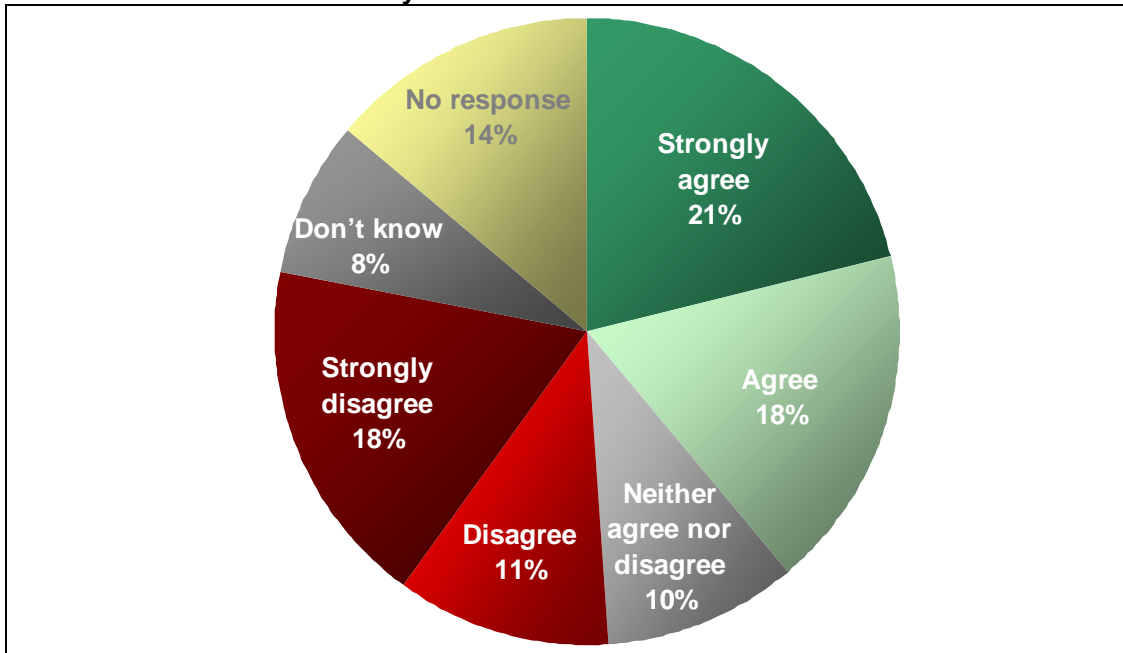
Despite all the improvements outlined in the draft Strategy, increasing population and demand for travel mean congestion and CO₂ emissions might still be a significant problem for London. The draft Strategy proposes that in this case it may be necessary to consider a fair system of road user charging to reduce congestion.

To what extent do you agree or disagree that a fair system of managing demand for road use should be used if necessary?

Overall, 39% of all questionnaire respondents agreed (18% agreed and 21% strongly agreed) that a fair system of managing demand for road use should be used if necessary. 29% of the consultation respondents disagreed (11% disagreed and 18% strongly disagreed).

²⁶ Proportions are of comments

Figure 13: Whether agree or disagree that a fair system of managing demand for road use should be used if necessary



Base: 4,948 all questionnaire respondents

Respondents using the Web questionnaire had more polarised views than respondents using the paper questionnaire, with larger proportions both agreeing and disagreeing that a fair system of managing demand for road use should be used if necessary:

- 48% of respondents using the Web questionnaire agree compared to 34% using the paper questionnaire
- 33% of respondents using the Web questionnaire disagree compared to 25% using the paper questionnaire.

Respondents using the paper questionnaire were much more likely than respondents using the Web questionnaire to tick 'don't know' or to give no response.

Table 15: Whether agree or disagree that a fair system of managing demand for road use should be used if necessary by response channel

	Total %	Response channel	
		Web %	Paper %
No response	14	7	20
Strongly agree	21	27	18
Agree	18	21	16
Neither agree nor disagree	10	10	10
Disagree	11	9	12
Strongly disagree	18	24	13
Don't know	8	2	12
Base (all questionnaire respondents)	4,948	2,011	2,937

Note: per cents may not add to 100% because of rounding

In Table 16 we show the proportions agreeing and disagreeing that a fair system of managing demand for road use should be used if necessary (after excluding those who did not respond to this particular question).

Table 16: Whether agree or disagree that a fair system of managing demand for road use should be used if necessary by response channel – *only* those who responded to this question

	Total %	Response channel	
		Web %	Paper %
Strongly agree	25	28	22
Agree	21	23	20
Neither agree nor disagree	12	11	12
Disagree	13	10	15
Strongly disagree	21	26	17
Don't know	9	3	14
Base (those who responded to this question)	4,240	1,878	2,362

Note: per cents may not add to 100% because of rounding

Analysis by whether resident or non-resident

Respondents to the consultation who lived in London were less likely to agree that a fair system of managing demand for road use should be used if necessary than those who lived outside of London: 44% compared to 50% agree or strongly agree.

Table 17: Whether agree or disagree that a fair system of managing demand for road use should be used if necessary by whether live in London²⁷

	Total %	Do you live in London?		
		Yes %	No %	Not stated %
No response	14	15	9	15
Strongly agree	21	24	29	5
Agree	18	20	21	6
Neither agree nor disagree	10	10	8	12
Disagree	11	9	5	21
Strongly disagree	18	17	24	18
Don't know	8	6	3	22
Base (all questionnaire respondents)	4,948	3,791	394	763

Note: per cents may not add to 100% because of rounding

Analysis by whether work in London or not

There was little difference in the answers to this question between respondents who stated that they worked in London and those who stated they did not work in London: 46% of the former and 47% of the latter agreed or strongly agreed that a fair system of managing demand for road use should be used if necessary.

4.7 Western Extension of the Congestion Charging Scheme

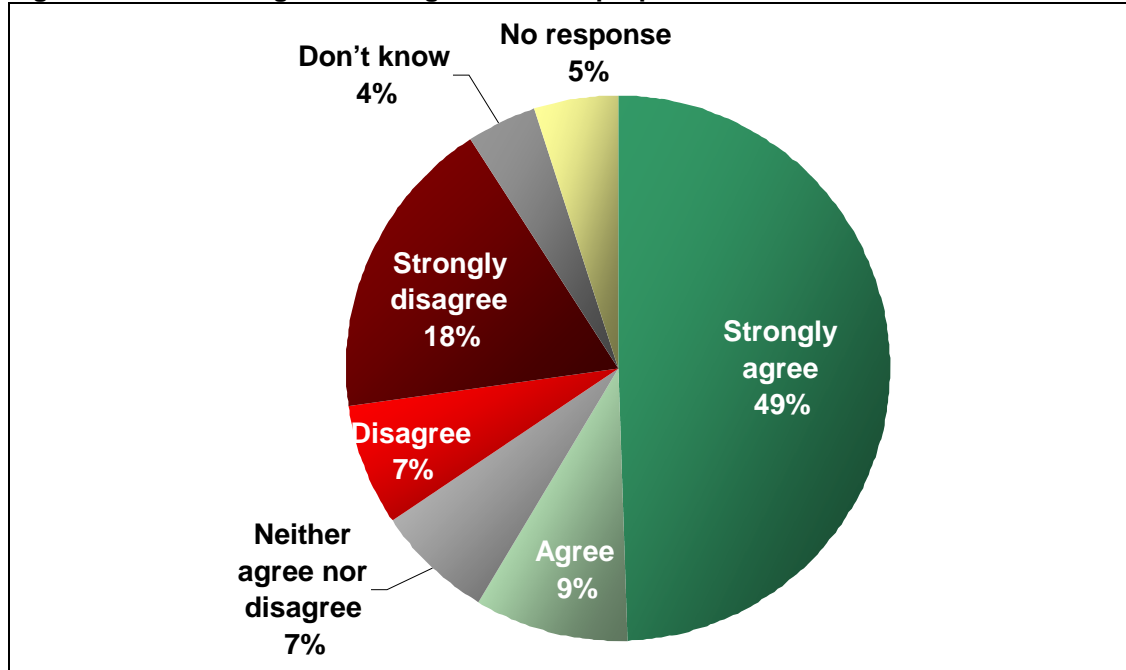
The draft Strategy proposes to remove the Western Extension of the Congestion Charging scheme after introducing measures (including improved traffic control systems and a Roadworks Permit Scheme) to mitigate as far as possible the impact of its removal.

To what extent do you agree or disagree with the proposal to remove the Western Extension?

²⁷ 85% answered the question about whether they lived in London

Overall, over half (58%) of all questionnaire respondents agreed to the proposal to remove the Western Extension (9% agreed and 49% strongly agreed). A quarter of the consultation respondents disagree (18% strongly disagreed and 7% agreed).

Figure 14: Whether agree or disagree with the proposal to remove the Western Extension



Base: 4,948 all questionnaire respondents
 Note: per cents do not add to 100% because of rounding

Respondents using the paper questionnaire were much more likely to agree to the proposal to remove the Western Extension than respondents using the Web questionnaire: 65% compared to 48%.

Table 18: Whether agree or disagree with the proposal to remove the Western Extension by response channel

	Total %	Response channel	
		Web %	Paper %
No response	5	3	7
Strongly agree	49	36	58
Agree	9	12	7
Neither agree nor disagree	7	10	5
Disagree	7	8	6
Strongly disagree	18	28	12
Don't know	4	2	5
Base (all questionnaire respondents)	4,948	2,011	2,937

Note: per cents may not add to 100% because of rounding

In Table 19 we show the proportion of respondents who agreed and disagreed with the proposal to remove the Western Extension, after excluding those who did not respond to this particular question.

Table 19: Whether agree or disagree with the proposal to remove the Western Extension by response channel – only those who responded to this question

	Total %	Response channel	
		Web %	Paper %
Strongly agree	52	38	62
Agree	10	12	8
Neither agree nor disagree	8	10	6
Disagree	7	8	7
Strongly disagree	20	29	13
Don't know	4	2	5
Base (those who responded to this question)	4,686	1,941	2,745

Note: per cents may not add to 100% because of rounding

Analysis by whether resident or non-resident

Respondents to the consultation who lived in London were more likely to agree to the proposal to remove the Western Extension than those who lived outside of London: 54% compared to 46% agree or strongly agree.

Table 20: Whether agree or disagree with the proposal to remove the Western Extension by whether live in London²⁸

	Total %	Do you live in London?		
		Yes %	No %	Not stated %
No response	5	5	5	7
Strongly agree	49	44	32	82
Agree	9	10	14	2
Neither agree nor disagree	7	8	11	1
Disagree	7	8	11	2
Strongly disagree	18	21	24	5
Don't know	4	4	5	*
Base (all questionnaire respondents)	4,948	3,791	394	763

* = less than 0.5%

Note: per cents may not add to 100% because of rounding

There was little difference in views on the proposal to remove the Western Extension between those who worked in London and those who did not.

Analysis by area

71% of respondents gave postcodes which could be used to disaggregate the data by area as follows:

- **WEZ/WEZ buffer** (n=347)– Residents living within the Western Extension area and within the area immediately adjacent to the Western Extension boundary who are eligible for the Residents' discount
- **OCZ/OCZ buffer** (n=81) – Residents living within the original charging zone and also within the area immediately adjacent to the original charging zone boundary who are eligible for the Residents' discount

²⁸ 85% answered the question about whether they lived in London

- **Rest of London** (n=2,739) – Residents living outside both the original charging zone and the Western Extension
- **Outside London** (n=328) – Residents living outside the capital²⁹.

Respondents who live in the WEZ were much more likely to agree with the proposal to remove the Western Extension than those who do not: 67% who lived in the WEZ agreed or strongly agreed with the proposal to remove the Western Extension compared to 21% who lived in the Original charging zone, 51% who lived in the rest of London and 48% who lived outside London.

Table 21 show the response by area compared to the overall response.

Table 21: Whether agree or disagree with the proposal to remove the Western Extension by area

	Total %	area			
		WEZ/WEZ buffer %	OCZ/OCZ buffer %	Rest of London %	Outside London %
No response	5	4	4	5	5
Strongly agree	49	59	15	40	34
Agree	9	8	6	11	14
Neither agree nor disagree	7	2	6	10	9
Disagree	7	4	17	8	13
Strongly disagree	18	22	46	22	21
Don't know	4	1	6	5	4
Base (all questionnaire respondents)	4,948	347	81	2,739	328

Note: per cents may not add to 100% because of rounding

Single Issue Responses

There was a small but significant proportion of respondents (236 respondents, 5% of the total sample) who answered this question but did not answer any part of Question 2.

Of these 236, 23 responded by Web and 213 by paper.

This group of single issue respondents were very much more likely to agree with the proposal to remove the Western Extension with nearly 100% (all but one) strongly agreeing to it compared to 49% for the whole sample (or 47% if these single issue respondents are excluded from the overall sample).

Comparison with non-statutory consultation on the future of the Western Extension

As described in Section 4.2 above, TfL undertook a non-statutory consultation on the future of the Western Extension on behalf of the Mayor in autumn 2008. It may be useful to briefly reiterate here the findings of this non-statutory consultation. In autumn 2008³⁰, respondents were asked to state whether the Western Extension should be kept

²⁹ The consultation was primarily intended for Londoners. However, responses were received from beyond the Capital.

³⁰ The non-statutory consultation did not propose a modification to the Scheme Order. Instead it set out to test opinion on a range of options to enable the Mayor to hear a range of views about the future of the Western Extension. It took place over a five week period from 1 September to 5 October 2008 inclusive.

as it is, be removed, or have changes made to the way it operates. There were 27,577 public, business and other organisation responses to this informal consultation. Of these, 69% chose Option 2 ‘Remove the Western Extension’³¹, compared to 58% agreeing with the proposal to remove the Western Extension in the public and stakeholder consultation on the draft MTS, which is the subject of the present report.

The full report on the non-statutory consultation of 2008 is available on the TfL website at:

<http://www.tfl.gov.uk/tfl/roadusers/congestioncharging/westernextension/default.aspx>

4.8 Additional Comments about Any Aspect of the Draft Mayor’s Transport Strategy

Q4 Any additional comments about any aspect of the draft Mayor’s Transport Strategy?

The open responses from the question asking if there were any additional comments about any aspect of the draft Mayor’s Transport Strategy were coded to the code frame. The main comments (representing 1% or more of all respondents) by response channel are shown in Table 22 for all comments. Table 23 shows responses from individuals and Table 24 shows responses from businesses.

It should be noted that most respondents did not make comments in this section. Overall 60% did not make any comments (45% of Web and 70% of paper questionnaire respondents).

Note on table format for tables 22-24

In Q4 everyone was invited to make a comment. Therefore, in tables 22-24 we present the data as proportions of all respondents.

This approach contrasts with the analysis of the open responses to Q2 where we present the data as proportions of those who made one or more comments. This is because comments in Q2 were only made if respondents chose to tick the ‘other’ option for one or more of the improvements listed. Many respondents did not do this but did tick one or more of the improvements listed.

The main comments were in support of removing the WEZ (5%) and on Congestion Charging generally (4%).

³¹ Just under a fifth (19%) chose Option 1 – *Keep the Western Extension as it is* and the remaining 12% chose Option 3 – *Change the way that the scheme operates*.

Table 22: Any additional comments about the MTS by response channel

	Total %	Web %	Paper %
O1 Supports removal of WEZ	5	7	4
O4 Comment on Congestion Charge generally	4	6	3
T7 General comment on MTS	4	6	2
T8 Other re Mayor or TfL	4	5	3
T3 Fares and ticketing	3	4	3
F1 Bus Service/route issues	3	3	3
F3 Bus design inc New Bus, Bendy Bus	3	4	2
T2 Financing transport schemes	2	3	2
R1 Further road user charging in London	2	4	1
D7 Other (Cycling)	2	4	1
O2 Opposes removal of WEZ	2	4	1
A6 Other (Tube)	2	2	2
H7 Other (Better Streets/Roads)	2	2	1
F4 Other (Buses)	2	2	2
A4 Tube line extensions	1	3	1
H6 Making changes to how different road users use the road/road space allocation (e.g. bus, cycle lanes)	1	3	1
H1 Parking	1	2	1
N5 CO ₂ Emissions (General)	1	3	1
P2 Physical accessibility improvements, eg step-free tube, bus ramps	1	1	1
J4 River crossings	1	3	0
D6 Changes to road layout for cycling (cycle lanes, one way streets, gyratories etc)	1	2	1
B11 Other (Rail)	1	1	1
B9 DLR comment	1	2	0
B10 Tramlink comment	1	1	1
P6 Concessionary fares	1	1	1
Q3 Road Safety	1	2	1
H2 Smoothing traffic flow	1	1	1
Q2 Public Transport Safety (general)	1	1	1
N10 Other environment/climate change comment	1	1	0
B2 Increased rail capacity	1	1	0
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	1	1	1
T4 London Plan comment (planning issues)	1	1	1
Q5 Other crime, safety comment	1	1	1
B8 Crossrail 1 & 2 (inc Chelsea-Hackney line)	1	1	1
J5 Other Thames/waterways/ River Crossing comment	1	1	1
O3 Other WEZ (inc mitigation traffic, environment impacts)	1	1	1
D4 Cycle Superhighways	1	1	0
A3 Tube frequency/capacity	1	1	0
C4 Integrating London's transport system and services	1	1	0
S8 Olympic Games 2012	1	1	0
A1 More reliable/longer hours tube service	1	1	0
N7 Electric vehicles	1	1	0
B6 Integration of TfL/NR services eg Oyster PAYG on all rail	1	1	0
G4 Other (Information)	1	0	1
N9 Transport impact on natural environment	1	1	0
H4 Shared space/better streets	1	1	0
A2 Improvements to tube stations/staffing	1	1	1
Other (sum of where proportion was less than 1%)	14	21	9
Irrelevant	1	1	1
No comments	60	45	70
Base (all respondents who answered the questionnaire)	4,948	2,011	2,937

Individuals

Comments from individuals were very similar to those for the overall sample.

Table 23: Any additional comments about the MTS – individuals

	Total %
O1 Supports removal of WEZ	5
O4 Comment on Congestion Charge generally	5
T7 General comment on MTS	5
T3 Fares and ticketing	4
T8 Other re Mayor or TfL	4
F1 Bus Service/route issues	4
F3 Bus design inc New Bus, Bendy Bus	3
T2 Financing transport schemes	3
R1 Further road user charging in London	2
D7 Other (Cycling)	2
O2 Opposes removal of WEZ	2
A6 Other (Tube)	2
H7 Other (Better Streets/Roads)	2
F4 Other (Buses)	2
A4 Tube line extensions	2
H6 Making changes to how different road users use the road/road space allocation (eg bus, cycle lanes)	2
H1 Parking	2
D6 Changes to road layout for cycling (cycle lanes, one way streets, gyratories etc)	2
N5 CO ₂ Emissions (General)	2
B11 Other (Rail)	2
P2 Physical accessibility improvements, e.g. step-free tube, bus ramps	1
J4 River crossings	1
Q3 Road Safety	1
B9 DLR comment	1
B10 Tramlink comment	1
P6 Concessionary fares	1
Q5 Other crime, safety comment	1
H2 Smoothing traffic flow	1
Q2 Public Transport Safety (general)	1
B2 Increased rail capacity	1
T4 London Plan comment (planning issues)	1
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	1
B8 Crossrail 1 & 2 (inc Chelsea-Hackney line)	1
N10 Other environment/climate change comment	1
S8 Olympic Games 2012	1
B6 Integration of TfL/NR services eg Oyster PAYG on all rail	1
J5 Other Thames/waterways/ River Crossing comment	1
A3 Tube frequency/capacity	1
C4 Integrating London's transport system and services	1
D4 Cycle Superhighways	1
G4 Other (Information)	1
N9 Transport impact on natural environment	1
A1 More reliable/longer hours tube service	1
O3 Other WEZ (inc mitigation traffic, environment impacts)	1
N7 Electric vehicles	1
H4 Shared space/better streets	1
A2 Improvements to tube stations/staffing	1
S2 Radial Connectivity	1
R5 Other demand mgt/road user charging	1
D1 Cycle parking	1

Other (sum of where proportion was less than 1%)	15
Irrelevant	1
No other comments	54
Base (all individuals who answered the questionnaire)	3,681

Businesses

The main comments from businesses were in support of removing the WEZ (11%), or concerned the Mayor or TfL(7%).

Table 24: Any additional comments about the MTS – businesses

	Total %
O1 Supports removal of WEZ	11
T8 Other re Mayor or TfL	7
O4 Comment on Congestion Charge generally	4
T7 General comment on MTS	4
T2 Financing transport schemes	3
T3 Fares and ticketing	2
O2 Opposes removal of WEZ	2
P2 Physical accessibility improvements, e.g. step-free tube, bus ramps	2
O3 Other WEZ (inc mitigation traffic, environment impacts)	2
A6 Other (Tube)	1
H7 Other (Better Streets/Roads)	1
F4 Other (Buses)	1
H2 Smoothing traffic flow	1
Q2 Public Transport Safety (general)	1
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	1
D4 Cycle Superhighways	1
N7 Electric vehicles	1
N6 Low carbon infrastructure/tech	1
F1 Bus Service/route issues	1
F3 Bus design inc New Bus, Bendy Bus	1
R1 Further road user charging in London	1
D7 Other (Cycling)	1
N5 CO ₂ Emissions (General)	1
J4 River crossings	1
N10 Other environment/climate change comment	1
J5 Other Thames/waterways/ River Crossing comment	1
S8 Olympic Games 2012	1
N9 Transport impact on natural environment	1
N3 Incentives for cleaner vehicles in private ownership (eg cars, road tax)	1
D8 Introduce a compulsory license scheme for cyclists	1
S3 Outer London comment	1
I6 Other (Freight)	1
N2 Regs & standards on GLA/public fleet for air quality/CO ₂ /noise	1
P4 Accessibility Plan/Disability Equality Scheme	1
Other (sum of where proportion was less than 1%)	12
Irrelevant	3
No other comments	56
Base (all businesses who answered the questionnaire)	205

Analysis by Theme

The code frame was organised into thematic sections (See Section 2.6). The sections which gained the highest proportions of distinct comments were 'Links to other

Strategies/Finances/General’, ‘Western Extension of Congestion Charge and Low Emission Zone’, ‘Buses’, ‘Better Streets and Roads’ and ‘Rail’:

- Links to other Strategies/ Finances/ General 15%³²
 - Western Extension of Congestion Charge and Low Emission Zone 12%
 - Buses 7%
 - Better Streets and Roads 7%
 - Rail (incl. National Rail services, TfL Overground, DLR and Tramlink) 7%
 - Cycling 6%
 - Tube/London underground 5%
 - Environment, Air Quality & Climate Change (CO₂) 5%
 - Demand Management/Road user charging 4%
 - Accessibility 3%
 - Crime, Safety & Security 3%
 - Misc & Cross Mode Issues 3%
 - Thames/River Crossings/Blue Ribbon Network 2%
 - Interchange 1%
 - Information 1%
 - Walking 1%
 - Airports/access to airports 1%
 - Freight 1%
 - Taxis, private hire and coaches *
- * = less than 0.5%

4.9 Questions about the Respondents

Whether Live in London

Over three quarters of the responses to the consultation were from those who identified themselves as living in London: 77% compared to 8% who identified themselves as not living in London. 15% did not respond to this question.

Respondents who used the Web questionnaire were more likely to identify themselves as living in London than those who used the paper questionnaire (12% compared to 6%³³).

Table 25: Whether live in London by response channel

	Total %	Response channel	
		Web %	Paper %
Not stated	15	8	20
Yes	77	80	74
No	8	12	6
Base (all questionnaire respondents)	4,948	2,011	2,937

³² Proportions are of comments

³³ 13% and 7% after excluding non responses

Whether work in London

Sixty per cent of the responses to the consultation were from those identified themselves as working in London and 19% said they who did not work in London. 21% did not respond to this question.

Respondents who used the Web questionnaire were more likely than those who used the paper questionnaire to say that they worked in London (73% compared to 51%³⁴).

Table 26: Whether work in London by response channel

	Total %	Response channel	
		Web %	Paper %
Not stated	21	10	28
Yes	60	73	51
No	19	17	21
Base (all questionnaire respondents)	4,948	2,011	2,937

Respondent Type

Most of the responses to the consultation were from respondents who identified themselves as individuals rather than businesses: 74% individuals and 4% business. Over a fifth did not respond to this question including 30% of respondents who used the paper questionnaire.

Table 27: Whether answering as individual or business by response channel

	Total %	Response channel	
		Web %	Paper %
Not stated	21	9	30
As an individual	74	88	65
As a representative of a business or organisation	4	3	5
Base(all questionnaire respondents)	4,948	2,011	2,937

Gender

Overall, half of the respondents to the consultation who gave their gender identified themselves as male and 31% said that they were female. A fifth did not respond to this question.

Respondents who used the paper questionnaire were more likely say that they were female than those who used the web questionnaire (33% compared to 27%).

Table 28: Gender by response channel

	Total %	Response channel	
		Web %	Paper %
Not stated	20	11	26
Male	50	62	41
Female	31	27	33
Base (all questionnaire respondents)	4,948	2,011	2,937

³⁴ 81% and 71% after excluding non responses

Ethnic background

The respondents' ethnic background was predominantly identified as White: 57% (or 76% after excluding the 26% who did not respond to this question).

Respondents who used the Web questionnaire were more likely to say that they were White than those who used the web questionnaire (74% compared to 45%³⁵).

Table 29: Ethnic background by response channel

	Total %	Response channel	
		Web %	Paper %
Not stated	26	12	35
Asian/Asian British	4	4	3
Chinese	1	1	1
White	57	74	45
Black/Black British	2	2	3
Mixed ethnic background	2	2	2
Other ethnic group	8	4	11
Base (all questionnaire respondents)	4,948	2,011	2,937

In Table 30 the data from the consultation has been re-percentageed after excluding non responses to allow for comparison with the Census data. According to the 2001 Census, 71% of the London population is white.

Table 30: Ethnic background compared to 2001 Census

	Total* of respondents %	2001Census %
White	76	71
Asian/Asian British	5	12
Black/Black British	3	11
Mixed	3	3
Chinese	1	1
Other	11	2
Base	3,665	5,723,353

* data re-percentageed after excluding 26% who did not state their ethnic background

Age

The age distribution of those who responded is shown in Table 31. Thirty two per cent of the respondents identified themselves as aged 25-44 years and 27% as aged between 45 and 64 years.

Respondents using the Web questionnaire had a younger age profile than those using the paper questionnaire. As shown in Table 31, 56% of respondents using the web questionnaire identified themselves as aged less than 45 years old, compared to 29% for the paper questionnaire.

³⁵ 84% compared to 69% after excluding non response

Table 31: Age group by response channel

	Total %	Web	Paper
		%	%
Not stated	22	9	32
Under 16	1	1	1
16-24	7	10	6
25-44	32	45	22
45-64	27	30	26
65+	10	5	14
Base(all questionnaire respondents)	4,948	2,011	2,937

A comparison with the 2001 Census data for London is shown in Table 32. In this table the data from the consultation has been re-percentage after excluding under 16 year olds and non responses to allow for comparison with the Census data.

Table 32: Age profile of respondents compared to 2001 Census

	Total* of respondents %	2001 Census %
16-24	10	15
25-44	41	44
45-64	36	25
65+	13	16
Base	3,796	5,723,353

* 'Not stated' and those aged under 16 years old have been excluded and the remaining respondents were re-percentage up to 100%

5. OPEN RESPONSES

5.1 Introduction

This chapter reports on the open responses received to the MTS consultation from Other Organisations, the general public and businesses.

There were 55 open responses from Other Organisations, 551 from the general public and 25 from businesses.

The quotations shown in this chapter were chosen to provide a representative view of the comments made and are not intended to be exhaustive.

Note on table format for tables 33-35

Table 33 for Other Organisations and Table 35 for businesses show numbers and not percentages as the sample sizes are small. In table 34 we present the data as proportions of all general public respondents who submitted an open response.

The approach used to present the data in table 34 is similar to that used for tables 22-24 for Q4 where everyone was invited to make a comment and the proportions are of all respondents.

This approach contrasts with the analysis of the open responses to Q2 where we present the data as proportions of those who made one or more comments. This is because comments in Q2 were only made if respondents chose to tick the 'other' option for one or more of the improvements listed. Many respondents did not do this but did tick one or more of the improvements listed.

5.2 Other Organisations

This section presents an analysis of the responses from the 55 Other Organisations who made an open response to the consultation.

These were organisations that responded to the public consultation exercise on behalf of the interests of a wider group; for example, business representative groups and residents' associations. These organisations were often limited to a particular locality, or have a relatively small membership, compared to the stakeholder organisations that TfL invited to respond to the consultation, and whose responses were analysed in TfL's Report to the Mayor.

Sample

There were 55 responses from Other organisations:

- Action Disability Kensington & Chelsea (ADKC)
- airTEXT consortium
- Barnet Labour Group
- Bexley LA21 Natural Environment Focus Group (NEFG)
- Bromley Borough Roads Action Group (BBRAG)
- Cambridge Heath and London Fields Rail Users Group
- Campaign for a Better Harrow Environment
- Cheltenham Terrace Residents Association

- Chelsea Society
- Chris Nicholson, Liberal Democrat Parliamentary Candidate for Streatham
- Chuka Umunna, Parliamentary Candidate, Streatham Labour Party
- ClientEarth
- Connect
- Croydon Mobility Forum
- Drivers Alliance
- Driver-Guides Association (DGA)
- Duncan Terrace Association
- Ealing Liberal Democrats
- Earls Court and Olympia Group (submitted by Capital and Counties and WSP Group)
- East Surrey Transport Committee
- Evolution Quarter Residents Association (EQRA)
- Friends of the North Kent Marshes
- Green Chain Working Party
- Greenwich Action to Stop Pollution (GASP)
- Greenwich and Lewisham Friends of the Earth
- HACAN ClearSkies
- Hackney and Tower Hamlets Friends of the Earth
- Hammersmith and Fulham Disability Forum (DF)
- Harrow Friends of the Earth
- Harrow Public Transport Users Association
- InHolborn
- Islington Living Streets
- Kensington Society
- King's Health Partners
- Lambeth Liberal Democrat Group
- Liftshare
- Loanna Morrison, PPC for Bermondsey and Old Southwark
- London Autism Rights Movement
- London Environmental Education
- London to Luton Coordination Corridor Group
- Mark Clarke Conservative Parliamentary Spokesman, Tooting
- Metropolitan Tabernacle Baptist Church
- Neasden Residents' Association
- Oxford and Cambridge Square Residents and Leaseholders Association
- Progressive London
- Redbridge Disability Association
- RSPB
- South Bank Employers' Group
- South East London Chamber of Commerce
- Southwark Living Streets
- Southwark Rail Users' Group
- Team London Bridge (London Bridge Business Improvement District (BID))
- West London Friends of the Earth
- Windsor Lines Passengers Association.
- Zac Goldsmith, PPC Richmond Park and North Kingston.

Response

All comments were coded to the code frame (see Appendix B).

The code frame was organised into thematic sections (See Section 2.6). The sections which gained the highest proportions of distinct comments were 'Links to other Strategies/Finances/General', 'Environment, Air Quality & Climate Change (CO₂)' and 'Rail':

• Links to other Strategies/Finances/General	13% ³⁶
• Environment, Air Quality & Climate Change (CO ₂)	11%
• Rail (incl. National Rail services, TfL Overground, DLR and Tramlink)	10%
• Better Streets and Roads	7%
• Accessibility	7%
• Misc & Cross Mode Issues	7%
• Buses	6%
• Tube/London underground	6%
• Cycling	6%
• Western Extension of Congestion Charge and Low Emission Zone	5%
• Demand Management/Road user charging	4%
• Interchange	4%
• Airports/access to airports	4%
• Thames/River Crossings/Blue Ribbon Network	3%
• Crime, Safety & Security	3%
• Information	2%
• Walking	2%
• Freight	*
• Taxis, private hire and coaches	0%

* = less than 0.5%

Table 33 shows the coding of the comments made. Because of the small sample size the table shows numbers of comments rather than percentages.

Table 33: Comments made by Other Organisations

	n
P2 Physical accessibility improvements eg step free tube/bus ramps	16
F1 Bus Service/route issues	14
N5 CO ₂ emissions general	13
H7 Other - better streets/roads	12
B11 Other - rail	12
T2 Financing transport schemes	11
S1 Orbital connectivity	11
N10 Other environmental/climate change comment	11
O2 Opposes removal of WEZ	10
T3 Fares and ticketing	10
A6 Other - tube	10
T1 Working with Boroughs/LIPs process/Sub-regional plans	9
T7 General comments on MTS	9
B8 Crossrail 1 and 2	9

³⁶ Percentages are of responses

	n
A3 Tube frequency/capacity	9
T8 Other re Mayor or TfL	8
Q3 Road Safety	8
J4 River crossings	8
N9 Transport impact on natural environment	8
T4 London Plan comment (planning issues)	8
T5 EDS comment	7
R1 Further road user charging in London	7
N7 Electric vehicles	7
F4 Other (Buses)	7
C5 Other (Interchange)	7
B2 Increased rail capacity	7
M3 Aircraft and environment/noise	6
M2 Surface access to airports and High Speed 2 rail	6
M1 Airports general (inc Heathrow 3rd runway, Thames Estuary Airport)	6
H6 Making changes to how different road users use the road/roadspace allocation (eg bus, cycle lanes)	6
H1 Parking	6
F3 Bus design inc New Bus, Bendy Bus	6
E4 Development of key walking routes	6
D7 Other (Cycling)	6
B6 Integration of TfL/NR services eg Oyster PAYG on all rail	6
O4 Comment on Congestion Charge generally	6
S6 Regeneration/ Economic downturn (general)	5
S3 Outer London comment	5
P6 Concessionary fares	5
O7 Oppose Deferment/Suspension of Phase 3 of LEZ	5
N4 Local air quality measures including local low emission zones	5
G1 Providing consistent signage and information for cyclists and pedestrians (inc Legible London)	5
D6 Changes to road layout for cycling (cycle lanes, one way streets, gyratories etc)	5
D4 Cycle Superhighways	5
C4 Integrating London's transport system and services	5
B10 Tramlink comment	5
A4 Tube line extensions	5
S7 Cancelled Schemes (eg Cross River Tram, Thames Gateway Bridge)	4
R6 Introduce more Park and Ride schemes servicing Central London	4
R5 Other demand mgt/road user charging	4
N1 Noise Pollution (General)	4
H4 Shared space/better streets	4
D3 Cycle Hire Schemes	4
D1 Cycle parking	4
S2 Radial Connectivity	3
R3 Smarter Travel (inc workplace and school travel plans)	3
R2 Reducing the Need to Travel	3
Q2 Public Transport Safety (general)	3
P4 Accessibility Plan/Disability Equality Scheme	3
P3 Non-physical improvements eg information, attitudes	3
P1 Public transport and access to services - eg health, education, jobs	3
O5 LEZ (General)	3
N2 Regs & standards on GLA/public fleet for air quality/CO ₂ /noise	3
J5 Other Thames/waterways/ River Crossing comment	3
H5 Improving the appearance of streets	3
G3 Providing travel planning and guidance to assist people in deciding how to travel	3
C2 Improving the design and quality of areas around stations and termini (inc car drop-off)	3
C1 More capacity at interchanges	3
B9 DLR comment	3

	n
A2 Improvements to tube stations/staffing	3
S8 Olympic Games 2012	2
S5 Comment on local issue	2
Q5 Other crime, safety comment	2
P5 Dial-a-Ride	2
N3 Incentives for cleaner vehicles in private ownership (eg cars, road tax)	2
I5 Rail freight	2
H2 Smoothing traffic flow	2
G4 Other (Information)	2
G2 Enhancing the provision of live information about transport (eg online and text message)	2
F2 iBus and information provision	2
E5 Other (Walking)	2
D2 Cycle training	2
B5 TfL Overground rail (inc East London Line, North LL)	2
B4 High Speed 1/ rail links to Europe	2
O6 Support Deferment/Suspension of Phase 3 of LEZ	1
O1 Supports removal of WEZ	1
N6 Low carbon infrastructure/tech	1
J2 Integrating Thames with other transport (including Oyster)	1
J1 Piers/ Wharves/Sea Ports/stopping points	1
H3 Roadworks (Permits, lane rental, control of)	1
E1 Health impacts of walking	1
E3 Improving the quality and design of streets, removing clutter	1
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	1
B7 Improved services inner + outer London	1
B1 Improved service levels (staffing, clean, secure)	1
A1 More reliable/longer hours tube service	1

Base: 55 Other Organisations; 482 comments

Details of response

The three areas which attracted the most comments were:

- physical accessibility improvements eg step-free tube, bus ramps
- bus service/route issues
- CO₂ emissions general.

Physical accessibility improvements eg step-free tube, bus ramps

There were 16 responses under ‘Physical accessibility improvements eg step-free tube, bus ramps’. Whilst there was support for the proposals within the MTS, there was also disappointment that more was not being done. As one would expect, this was stated in particular by mobility and disability groups. However, other groups also expressed concern.

Hammersmith and Fulham Disability Forum responded:

“Whilst supporting the Mayor’s proposals the DF [Disability Forum] are disappointed that the present proposals are a dilution of previous promises in particular the percentage of stations on the tube network with step-free access has been significantly reduced.”

Harrow Friends of the Earth also raised this concern:

“Step-free access at stations should be a major priority for investment in the Underground network. Harrow-on-the-Hill is an example of a very busy station which those with mobility problems, young children or heavy luggage cannot use, at least without the greatest difficulty. Yet we are told there is no funding for improvements.”

Action Disability Kensington and Chelsea provided specific examples:

“Many plans to make tube stations step free have been deferred. Of particular concern step-free access to South Kensington Station has been deferred. There is a huge need for this station to be accessible. It is well documented that disabled people have less access to goods and services and are more likely to experience inequality across many areas (such as health and education) as a result. It is also well documented that they engage less with arts institutions as a result of this inequality . . .

. . . Plans to make Ladbroke Grove Tube station step-free have also been deferred and we would ask for this to be re-considered as this area is of North Kensington has high numbers of social housing and is a ‘hub’ of activity.”

Progressive London called for similar improvements at bus stops:

“Improve the bus waiting environment – particularly tackling the fact that while all buses themselves are step-free, only 45% of stops are fully accessible.”

Hammersmith and Fulham Disability Forum noted that there were no commitments or proposals to improve the effectiveness of ramps in terms of their deployment at bus stops.

Croydon Mobility Forum suggested that the MTS should make the commitment that *“our future transportation systems are more accessible for disabled and older people, together with greater focus in ensuring all forms of transport are better integrated.”*

Other organisations expressing their views on this issue included Islington Living Streets, Redbridge Disability Association, Kings Heath Partners, London Autistic Rights Movement and Ealing Borough Liberal Democrats.

Bus service/route issues

‘Bus service/route issues’ also attracted a high level of response, with 14 mentions on this issue. In particular, there was a perceived need for a further review of the bus service in specific areas where it was considered inadequate, called for by the following organisations: South Bank Employers Group, North London Strategic Alliance, South East London Chamber of Commerce and Loanna Morrison PPC for Bermondsey and Southwark.

The Cambridge Heath and London Fields Rail Users group and Campaign for a Better Harrow Environment wanted more bus lanes, the former recommended that:

“Bus lanes should be improved, extended and all made effective for the full 24 hours. This would remove any confusion among motorists as to whether the lane is operational. Bus lanes should continue right up to traffic signals. The law should be changed to ensure cars turning left always give way to buses in a parallel bus lane.”

Campaign for a Better Harrow Environment also said:

“Fast orbital bus services with a high degree of bus lane provision are therefore essential in outer London to ensure that the metropolitan town centres do not become gridlocked as they already are for part of the working day.”

Action Disability Kensington and Chelsea and Harrow Friends of the Earth expressed concern that bus services may be reduced or altered detrimentally, whilst the East London Transport Committee and Harrow Public Transport Users Association both suggested improvements to the bus network within their areas.

CO₂ emissions general

There were 13 comments on CO₂ emissions. Overall, there was clear support for the Mayor’s commitment to achieving a significant reduction in CO₂ emissions. However, a number of groups expressed concern that there was a policy gap between stating this target and how it will be delivered. For example, Progressive London welcomed the proposed Climate Change Action Plan, but noted that the strategy *“fails to set out how a 60% cut in CO₂ emissions from transport will be achieved by 2025”*. Hackney and Tower Hamlets Friends of the Earth, West London Friends of the Earth and Zac Goldsmith PPC echoed this view.

Harrow Friends of the Earth and Greenwich Action Stop Pollution went further in highlighting the need to target a reduction in road building and road traffic in order to deliver the CO₂ reduction target, whilst Friends of North Kent Marshes and HACAN Clear Skies both called for reduced aviation growth.

Cambridge Heath and London Fields Rail Users Group looked to other pollutants besides CO₂,

“The Mayor’s target for a 60% reduction in CO₂ by 2025 is supported, but there should be more concern about pollutants from diesel and petrol-powered motor vehicles, including nitrous oxides and particulates.”

The Bromley Borough Roads Action Group called into question the basis of the Mayor’s commitment to the CO₂ reduction target,

“Bearing in mind that the science associated with climate change is dubious in the extreme, it is inappropriate for the Mayor to spend large resources on trying to reduce CO₂ emissions. In practice his proposals are not going to even achieve his stated objective. If you really want to reduce CO₂ emissions the only solution would be to reduce the

population and business activities in London, when your policies seem to be the exact opposite!”

Other issues that were of particular concern

Financing transport schemes

There were eleven responses with comments on ‘financing transport schemes’.

Other organisations that raised concerns around funding included The Chelsea Society, Bromley Borough Roads Action Group, The Campaign for a Better Harrow Environment, London to Luton Coordination Corridor Group, South Bank Employers Group, Hackney & Tower Hamlets Friends of the Earth and West London Friends of the Earth.

London to Luton Coordination Corridor Group were concerned that as the *“bulk of Transport for London’s funding was concentrated on the implementation of Crossrail and upgrades to the Underground”* this left *“little, if any, provision for the development and implementation of other medium and large-scale schemes”*.

The Campaign for a Better Harrow Environment thought that the MTS provided a useful framework for detailed planning necessary to achieve a better Harrow environment and that it was vital that it was *“backed by adequate funding in order to ensure that Harrow is able to deliver its targets”*.

West London Friends of the Earth said that shortage of money was stated by the Mayor *“but not in the Strategy, as the reason for not enhancing buses (and also for raising fares).”*

Orbital connectivity

‘Orbital connectivity’ was raised in eleven responses. There was a generally positive response to the MTS on this issue amongst groups such as Progressive London, West London Friends of the Earth, Barnet Labour Group, Bromley Borough Roads Action Group.

“Orbital transport links in Barnet are poor and they will come under greatly increased pressure when major developments in the borough are completed and predicted population growth occurs. Therefore we welcome the intention in Policy 7 to ‘seek to improve orbital connectivity in Outer London’.”

Barnet Labour Group

Southwark Rail Users’ Group said that many rail users welcomed *“the now firm plan to build the orbital Overground rail link via the East London Line Extension phase 2.”* They recognised that the Mayor and TfL do not have responsibility for the other radial Overground rail services through this area but nevertheless stated that it was important that the MTS should indicate the significant role that those radial Overground rail services play in the local transport network for Zone 2 in inner south London.

Campaign for a Better Harrow Environment called for “*fast orbital bus services with a high degree of bus lane provision*” to relieve the pressure on town centre road systems and car parks.

Croydon Disability Forum asked for “*the possible funding, for an upgrade of the south London orbital road system.*”

Harrow Friends of the Earth asked for orbital tram services in outer London. The London to Luton Coordination Corridor requested a clear focus on orbital public transport improvements particularly along the A406 North Circular.

Cambridge Heath and London Fields Rail Users Group said that the “*connectivity of Orbirail needs to be improved over the long term once the East London Line is open.*” Progressive London said that the MTS asked for new services, like orbital and express bus routes to stimulate modal shift in Outer London.

Opposed removal of WEZ

Ten responses were opposed to the removal of WEZ. Progressive London said that the MTS was confusing and contradictory on Congestion Charging as it notes that the Mayor may consider road user charging schemes in future,

“...Yet, when it comes to a Congestion Charging scheme that is already in place, proven to work and which a majority of Londoners support - the Western Extension of the central London congestion zone, the Strategy proposes to scrap it. This is despite noting that the result would be “an increase in congestion in the area.”

ClientEarth said that the removal of the WEZ failed to consider the health impacts of the increased air pollution and said that the MTS contained no detailed quantified mitigation measures to offset the disbenefits of removing the WEZ.

Others who wished the WEZ to be kept included Southwark Living Streets and Islington Living Streets, The Chelsea Society, Harrow Friends of the Earth and West London Friends of the Earth, The Kensington Society and Cheltenham Terrace Residents Association.

“We support the retention of the Western Extension zone to the central London Congestion charge. We believe that it delivers significant benefits to the quality of life of local people through reduced congestion and improved air quality and that its removal flies in the face of other objectives such as climate change and a more liveable London.”
Southwark Living Streets

Only one Other Organisation (Bromley Borough Roads Action Group (BBRAG)) expressed support for the removal of the WEZ .

Fares and ticketing

There were ten comments on ‘fares and ticketing’. Most comments concerned high fares or increases.

Cambridge Heath and London Fields Rail Users Group said that rail and bus fares “*should be held down as far as possible and any rises should be less than any increase in motoring costs.*”

Action Disability Kensington & Chelsea were concerned that as disabled people are more likely to be unemployed and living in poverty they needed access to more affordable public transport. “*Huge fare rises will have a disproportionate impact on this group already more likely to experience poverty.*”

Others complaining about high fares or fare rises included Drivers Alliance, East Surrey Transport Committee, Harrow Friends of the Earth and Progressive London.

Harrow Public Transport Users Association said that the fares increases levied on bus passengers seem “*disproportionate to those levied on the Tube.*”

Barnet Labour Group said that fares increases will discourage people from using more sustainable modes of transport like buses, tubes and trains.

The other comments in ‘fares and ticketing’ concerned increasing flexibility of Oyster.

Campaign for a Better Harrow Environment wanted Oyster to be used for a single payment for a local park and ride scheme.

Cambridge Heath and London Fields Rail Users Group believed that Oyster should be extended nationwide and for renting bicycles in the proposed London scheme.

East Surrey Transport Committee although welcoming the introduction of Oyster to National Rail stated that by “*its rigid nature*” it was proving to be less flexible than paper tickets for a number of types of journey such as when one journey is in the peak and others are in the off-peak.

Crossrail 1 and 2

Nine responses concerned Crossrail 1 and 2. Six supported plans for Crossrail 1 and/or 2.

South East London Chamber of Commerce, Railwatch, West London Friends of the Earth, Hammersmith and Fulham Disability Forum, Bexley Natural Environment Focus Group supported Crossrail.

“Crossrail is good news for London. The Central Line has been overcrowded for the past 30 years.”

Railwatch

Bexley Natural Environment Focus Group added the caveat that it was extended to Abbey Wood station.

The Chelsea Society said that Crossrail 1 and 2 were “*needed to reduce crowding on existing Underground lines and establish new connections.*” However, it was concerned that:

“...both the proposed Chelsea Station sites are heavily constrained by being adjacent to Conservation Areas, listed buildings and established residential streets. Neither is suited to the very large scale works associated with, for instance, the station for Crossrail 1 at Tottenham Court Road.”

It was also concerned about the routing of Crossrail 2. Two ‘Other Organisations’ raised concerns about Crossrail.

South Bank Employers’ Group were concerned that:

“...the commitment to Crossrail will hinder other very high priority transport infrastructure investment, notably at Waterloo.”

Croydon Mobility Forum stated that there was too much emphasis on Crossrail.

With regard to Crossrail 2, Evolution Quarter Residents Association (EQRA) stated:

“We are concerned that references to a Crossrail 2 would drain investment from South London so any funding must be ring fenced and safe from political interference.”

Frequency and capacity

Nine responses related to ‘frequency and capacity’ and how much more could be done.

For example, Chris Nicholson, Liberal Democrat Parliamentary Candidate for Streatham outlined his concerns:

“There is, as the document acknowledges, an urgent need to relieve the current overcrowding on the Northern Line. Whilst the currently planned upgrades and the further suggested upgrades, which are forecast to increase capacity by more than 20%, are welcome this is still not enough, given likely increasing demand and the current severe overcrowding.”

The North London Strategic Alliance raised a similar concern:

“By 2025 the additional capacity from the PPP Underground Programme will not be enough to mitigate congestion levels on the Northern Line. In this context the proposed simplification and recasting of service patterns by 2020 is welcomed. However more will need to be done in the long term if planned growth is to be accommodated.”

The Campaign for a Better Harrow Environment raised the following concern:

“ . . . the replacement of trains on the Metropolitan Line (Proposal 20) will increase capacity by providing more standing space and less seating.”

Other organisations expressing disquiet included Lambeth Democratic Group and Islington Living Streets.

InHolborn and Harrow Public Transport Users Association also outlined their requirements to improve existing capacity.

5.3 General Public

There were 551 general public written submissions in total. A majority of submissions took the form of emails (517) and the rest were letters (34).

Response

All comments were coded to the code frame (see Appendix B). The 551 respondents made 2,347 codeable comments, an average of 4.3 per respondent.

The code frame was organised into thematic sections (See Section 2.6). The sections which gained the highest proportions of distinct comments are ‘Links to other Strategies/Finances/General’, ‘Western Extension of Congestion Charge and Low Emission Zone’, ‘Environment, Air Quality & Climate Change (CO₂)’ and ‘Better Streets and Roads’:

• Links to other Strategies/Finances/General	19% ³⁷
• Western Extension of Congestion Charge and Low Emission Zone	12%
• Environment, Air Quality & Climate Change (CO ₂)	11%
• Better Streets and Roads	9%
• Rail (incl. National Rail services, TfL Overground, DLR and Tramlink)	8%
• Cycling	7%
• Buses	5%
• Tube/London underground	5%
• Crime, Safety & Security	5%
• Misc & Cross Mode Issues	4%
• Demand Management/Road user charging	3%
• Thames/River Crossings/Blue Ribbon Network	2%
• Interchange	2%
• Accessibility	2%
• Information	1%
• Freight	1%
• Walking	1%
• Airports/access to airports	1%
• Taxis, private hire and coaches	*

* = less than 0.5%

Table 34 shows the coding of comments which were made by 3% or more of respondents.

³⁷ The percentage are of responses

Table 34: Comments made by general public respondents

	% ³⁸
T3 Fares and ticketing	31
T8 Other re Mayor or TfL	22
O2 Opposes removal of WEZ	20
N5 CO ₂ Emissions (General)	18
N10 Other environment/climate change comment	16
O1 Supports removal of WEZ	14
H7 Other (Better Streets/Roads)	13
Q3 Road Safety	13
O4 Comment on Congestion Charge generally	12
H6 Making changes to how different road users use the road/roadspace allocation (eg bus, cycle lanes)	11
B10 Tramlink comment	11
B8 Crossrail 1 & 2 (inc Chelsea-Hackney line)	11
D7 Other (Cycling)	11
A6 Other (Tube)	10
T7 General comment on MTS	10
R1 Further road user charging in London	9
T2 Financing transport schemes	9
F4 Other (Buses)	8
F1 Bus Service/route issues	8
B11 Other (Rail)	6
T4 London Plan comment (planning issues)	5
D6 Changes to road layout for cycling (cycle lanes, one way sts, gyratories etc)	5
F3 Bus design inc New Bus, Bendy Bus	5
H2 Smoothing traffic flow	5
S8 Olympic Games 2012	5
C4 Integrating London's transport system and services	4
H1 Parking	4
D4 Cycle Superhighways	4
J5 Other Thames/waterways/ River Crossing comment	4
N7 Electric vehicles	4
N9 Transport impact on natural environment	4
Q2 Public Transport Safety (general)	4
A3 Tube frequency/capacity	3
P6 Concessionary fares	3
Q5 Other crime, safety comment	3
H3 Roadworks (Permits, lane rental, control of)	3
A4 Tube line extensions	3
D1 Cycle parking	3
D9 Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road	3
S1 Orbital Connectivity	3
B2 Increased rail capacity	3
J4 River crossings	3
R2 Reducing the Need to Travel	3
Other (sum of where proportion was less than 3%)	83

Base: 551 general public respondents

Details of response

Some examples of the responses made by general public respondents are shown below under the ten main response headings (excluding the other code categories such as 'Other re Mayor or TfL' or 'Other (Better Streets/Roads)' as these contained disparate comments which otherwise did not fit into a specific category).

³⁸ The percentages are of respondents

For data protection reasons we have anonymised responses from members of the public.

Fares and ticketing (31% of respondents)

Almost all complained about fares increases. Some example responses are shown below:

“20%? Why have Oyster Single bus journey gone up 20%. Interest rates are 0.25%. Inflation is 2%. Oyster single bus journey 20%.”

“The present and future public transport fare increases at the levels proposed are totally unacceptable. London’s fares are by far the highest of any European city, especially considering that the services provided are much superior and more reliable than in London.”

“Furthermore, please keep down fares to encourage use and increase the number of people who choose to use cycles, buses, the tube and trains - and their feet.”

Many linked the fares increases to removing the WEZ and/or removing bendy buses:

“Firstly you have made it more expensive, by not implementing the congestion charge levy on larger cars, you have had to increase the fares for everyone. By pushing through the ‘21st Century Routemaster’ at a cost of around £60 million you have had to further increase the fare, above inflation rate for ordinary people.”

“Reverse the plan to increase bus and tube fares above inflation. I understand you are planning to increase fares by RPI+2% every year. Keeping the western extension would help avoid such steep rises in fares.”

Some also stated that the increase in fares ran counter to the aims of reducing carbon emissions:

“The plans to reduce carbon emissions and traffic are laudable, but with the increases in bus and tube fares, this will only encourage use of cars.”

Opposes the proposal to remove WEZ (20% of respondents)

The WEZ was the second most important theme with a large number of responses both for and against its proposed removal. About a fifth of responses opposed the proposed removal of the Western Extension of the Congestion Charging zone (14% supported its proposed removal).

Many pointed out that as well as reducing congestion and pollution it was also a useful source of revenue:

“I don’t understand why you want to get rid of the Western section of the congestion zone: I have often cursed the congestion zone when I have to

drive in London, but it is a useful source of revenue for Transport in London and of course it reduces congestion which totally overrides any personal inconvenience because it is so vital to reduce emissions if our children are to have a decent future. From reading your pieces in the Telegraph I know that this concerns you too, so I hope you will try to include targets to reduce traffic, and maybe hold off increasing public transport fares (ie: by not scrapping the western extension)."

"I think that the western extension of the congestion zone is a good thing, so please do not get rid of it. It helps reduce emissions, encourages alternatives to the car and makes cycling safer in the area."

One person argued that it was beneficial for London as a whole and that *"it would be a retrogressive step to withdraw it, and thus to placate a small interest group of K&C residents and businesses."*

Some who lived in the WEZ asked for the zone to be kept:

"I live on Westbourne Terrace and often have to make necessary journeys in my car. If you cancel the western extension, I shall no longer be able to get the residents discount and that will stop me from using my car and at the same time, cause me considerable inconvenience and hardship."

"I am appalled by the Mayor's decision to abolish the congestion charge in our area. From an environmental perspective it is absolutely the wrong thing to do. From the perspective of residents it is wrong and crazy from a financial point of view as he is short of revenue for transport generally."

CO₂ Emissions (General) (18% of respondents)

The majority of responses here concerned the MTS not going far enough in terms of reducing CO₂ emissions. A typical comment was:

"I do not feel that the proposals contained within the draft go far enough, in particular with regard to setting out how transport in London will meet its target to reduce CO₂ emissions by 60% by 2020."

Some put forward specific public transport proposals to help achieve such cuts:

"TROLLEY buses!!!! Clean, quiet and efficient. PLUS, LESS pollution."

"Please showcase London in time for the Olympics with a new "all electric" Routemaster bus. Show the world EV³⁹s are viable, it can be done, it just needs determination. The benefits of EVs are well-known, the knock-on effect on public perception will be immense. EVs quickly becoming the talking point, then people will follow your lead with car

³⁹ EV = electric vehicles

purchase decisions and CO₂ / noise will drop soon after. Lead in the EV revolution - show what Mayors are for!"

"Efficient, cheap, reliable, safe Public Transport ...would reduce the number of private cars used which in turn would help with the matter of CO₂ emissions and the serious concerns of global warming."

A number of responses also linked the planned removal of the WEZ with increased CO₂ emissions.

"We find London noisy and smelly enough as it is but at least in the congestion zone there seemed to have been a vast reduction in traffic. How are you expecting to reduce CO₂?"

"...but the big question now is how to cut the carbon emissions and I suggest that you examine the wish list of proposals and cut out any that don't contribute to reduced emissions eg, reducing the congestion zone."

Supports removal of WEZ (14% of respondents)

As mentioned above the WEZ was the second most important theme with a large number of responses both for and against its removal. Fourteen per cent supported the removal of the Western Extension of the Congestion Charging zone (20% wanted it to stay). Typical responses included:

"The Western Extension was an aberration and it will be good news when it has gone."

"My view is that this should go. Indeed it should never have been introduced in the first place and all those who warned about it have been proven to be right. Another waste of tax money down the drain."

"I also insist that the Western extension zone is scrapped. I live within it and have not seen any reduction in traffics as a result. Only higher charges from all tradesmen coming into the zone."

Many of the respondents who wished the Western Extension of the Congestion Charge to be removed raised the issue that the Mayor had been elected on the basis of removing it:

"I expect the Mayor to honour his election pledge to remove the western extension of the congestion charge."

"The Western Congestion Charge was in dispute when Boris Johnson was elected (on this ticket) now he is reneging on this promise to scrapping it, it should be removed not extended."

Some complained that the MTS was a third consultation on the issue:

"Last year, Mayor Johnson held a second consultation. The extension was again overwhelmingly rejected. ...He has now gone back on his

word; ignoring the twice-expressed views of the public. He is holding a third consultation.”

“A third 'consultation' on the same issue is an utter disgrace. I believe the results will be corrupted for party political ends.”

Road Safety (13% of respondents)

There were a wide range of comments made on road safety. The main areas are shown below.

Reducing speed limit to 20mph

A reduction in the speed limit to 20mph throughout London or for all roads except major thoroughways was suggested by some:

“Reducing speed is important on all except the major thoroughways, and we consider the Mayor should include support for a mainly 20mph London, with only the major roads exempted and allowed 30mph.”

“A study of 20mph zones in London showed that they had reduced casualties by 45% and fatal and serious casualties by 57%. ...The strategy should strongly recommend the 20 mph limit throughout London.”

A reduction in the speed limit to 20mph was suggested for roads designated as cycle routes as *“this would improve safety and give these marked routes some meaning.”* Another respondent said that reducing traffic speeds to 20mph and would result in a huge increase in cycling *“as people who are currently afraid feel so much safer.”*

Shared space/removing guardrails

Some respondents made detailed comments against the idea of shared road space or removing guardrails on the grounds that it was unsafe. One said that the *“current fashion, to create shared spaces should be firmly resisted”* as mixing pedestrians and road users in the same space created the potential for high numbers of accidents as *“all too often pedestrians feel they have an automatic right of way, encouraged, of course, by the removal of curbs.”*

Another respondent said that raising the path across the roads to the height of the sidewalks in Earls Court Road and Kensington High Street had made the crossing very dangerous for pedestrians and drivers as *“between 30% and 50% of pedestrian no longer look to see if the right of way is clear for them to cross the road”* and therefore *“drivers are now at much higher risk of hitting a pedestrian.”*

Someone else questioned the safety claims regarding the removal of guardrails from Kensington High Street:

“This is nonsense, because the analysis was flawed. Accidents from all causes were simply added together, whether they were beneficial or not. By comparing accident data for sections of Kensington High Street with

and without guardrails I was able to deduce that removing guardrails had increased accidents by about 30%, or 5 casualties per year, but that this had been masked by decreases due to other changes, such as more crossings, better road surfacing and improved street lighting.”

Shared lanes

Some said it was unsafe to allow cycles, motorcycles and buses to share lanes:

“It is also unsafe to combine bus and cycle lanes, and allowing motorbikes to use these lanes too is a tragedy waiting to happen.”

“The decision to open bike lanes for motorcycles is criminal, the way it endangers lifes.”

Pedestrian crossings

A few raised concerns on the safety of pedestrian crossings:

“From the viewpoint of pedestrian safety and convenience at most signalled intersections in London there needs to be an increase in the frequency of the pedestrian crossing phase, without the need to push endless buttons. Otherwise the majority of pedestrians will continue to cross unsafely without waiting for the pedestrian phase because the wait is too long.”

“The pedestrian crossing outside Bermondsey tube has not worked properly for at least 5 years. I see children and teenagers crossing dangerously every day as they get fed up with the extremely slow response from the lights. Could someone please adjust them so we can cross safely???”

5.4 Business

There were 24 open written submissions from businesses. The businesses were:

- AEG Europe
- Alkol Inc
- Amba QA Ltd
- British Airways
- Barking Riverside Ltd
- BB Associates
- Biggin Hill Airport Ltd
- Colin Buchanan and Partners.
- Canary Wharf Group
- ColladoCollins
- Crowd Dynamics
- Development Securities
- DHL

- Gallery FortyOne
- GOVIA
- Land Securities
- National Grid Property Holdings (NGPH)
- NedRailways
- PricewaterhouseCoopers LLP
- Real Estate Opportunities Ltd
- Rosenstiel's
- UPS
- WiZZBiKE
- Wood Wharf (General Partner) Limited.

Sectors

Six of the companies were property or real estate companies. A further six offered professional services such as management consulting, transport planning, personal development, planning.

Four of the companies were transport companies including two air and two rail. There were two courier companies.

The remaining six companies were each in different sectors.

Response

All comments were coded to the code frame (see Appendix B).

The code frame was organised into thematic sections (See Section 2.6). The sections which gained the highest proportions of distinct comments are 'Links to other Strategies/Finances/General', 'Rail', 'Misc & Cross Mode Issues' and 'Environment, Air Quality & Climate Change (CO₂)':

• Links to other Strategies/Finances/General	16%
• Rail (incl. National Rail services, TfL Overground, DLR and Tramlink)	10%
• Misc & Cross Mode Issues	8%
• Environment, Air Quality & Climate Change (CO ₂)	8%
• Interchange	7%
• Better Streets and Roads	7%
• Airports/access to airports	7%
• Tube/London underground	5%
• Thames/River Crossings/Blue Ribbon Network	5%
• Information	4%
• Freight	4%
• Western Extension of Congestion Charge and Low Emission Zone	4%
• Accessibility	4%
• Buses	3%
• Cycling	3%
• Crime, Safety & Security	2%
• Taxis, private hire and coaches	1%

- Demand Management/Road user charging 1%
 - Walking *
- * = less than 0.5%

Table 35 shows the coding of all the comments made. Because of the small sample size the table shows numbers of comments rather than percentages.

Table 35: Comments made by business respondents

	n
T2 Financing transport schemes	12
C4 Integrating London's transport system and services	9
M2 Surface access to airports and High Speed 2 rail	8
B8 Crossrail 1 & 2 (inc Chelsea-Hackney line)	7
A6 Other (Tube)	5
H2 Smoothing traffic flow	5
M1 Airports general (inc Heathrow 3rd runway, Thames Estuary Airport)	5
N5 CO ₂ Emissions (General)	5
S2 Radial Connectivity	5
T1 Working with Boroughs/ LIPs process/Sub-regional plans	5
T3 Fares and ticketing	5
T7 General comment on MTS	5
A4 Tube line extensions	4
B11 Other (Rail)	4
C5 Other (Interchange)	4
G2 Enhancing the provision of live information about transport (eg online and text message)	4
G3 Providing travel planning and guidance to assist people in deciding how to travel	4
H3 Roadworks (Permits, lane rental, control of)	4
H7 Other (Better Streets/Roads)	4
J2 Integrating Thames with other transport (including Oyster)	4
O1 Supports removal of WEZ	4
P2 Physical accessibility improvements, eg step-free tube, bus ramps	4
S1 Orbital Connectivity	4
S3 Outer London comment	4
T4 London Plan comment (planning issues)	4
B9 DLR comment	3
F1 Bus Service/route issues	3
F4 Other (Buses)	3
H6 Making changes to how different road users use the road/roadspace allocation (eg bus, cycle lanes)	3
I6 Other (Freight)	3
J1 Piers/ Wharves/Sea Ports/stopping points	3
J4 River crossings	3
M3 Aircraft and environment/noise	3
N1 Noise Pollution (General)	3
P1 Public transport and access to services - eg health, education, jobs	3
R1 Further road user charging in London	3
T8 Other re Mayor or TfL	3
A3 Tube frequency/capacity	2
B1 Improved service levels (staffing, clean, secure)	2
B4 High Speed 1/ rail links to Europe	2
B6 Integration of TfL/NR services eg Oyster PAYG on all rail	2
C1 More capacity at interchanges	2
C3 Reducing the need to come into central London for Interchange for journeys to other places	2
D3 Cycle Hire Schemes	2
D7 Other (Cycling)	2

	n
I1 Delivery hours and loading issues	2
I2 Freight consolidation/distribution	2
L2 Taxis/Black cabs (general)	2
N6 Low carbon infrastructure/tech	2
N7 Electric vehicles	2
N8 Adapting to/ Risk Mgt of Climate Change	2
N10 Other environment/climate change comment	2
O4 Comment on Congestion Charge generally	2
P6 Concessionary fares	2
Q2 Public Transport Safety (general)	2
Q3 Road Safety	2
S6 Regeneration/ Economic downturn (general)	2
S8 Olympic Games 2012	2
T5 Economic Development Strategy comment	2
A2 Improvements to tube stations/staffing	1
B2 Increased rail capacity	1
B5 TfL Overground rail (inc East London Line, North LL)	1
D1 Cycle parking	1
D4 Cycle Superhighways	1
D6 Changes to road layout for cycling (cycle lanes, one way sts, gyratories etc)	1
E4 Development of key walking routes	1
F2 iBus and information provision	1
F3 Bus design inc New Bus, Bendy Bus	1
G4 Other (Information)	1
H1 Parking	1
I4 Water-borne freight	1
I5 Rail freight	1
L3 Private hire/minicabs (general)	1
N4 Local air quality measures including local low emission zones	1
N9 Transport impact on natural environment	1
O2 Opposes removal of WEZ	1
O3 Other WEZ (inc mitigation traffic, environment impacts)	1
O5 LEZ (General)	1
S4 Inner London comment	1
S7 Cancelled Schemes (eg Cross River Tram, Thames Gateway Bridge)	1

Base: 24 businesses; 230 comments

Details of response

Focusing on issues where more than five businesses gave a comment, the areas which attracted most comments were:

- Financing Transport Schemes
- Integrating London's transport system and services
- Surface access to airports and High Speed 2 rail
- Crossrail 1 & 2.

Financing Transport Schemes

Whilst businesses tended to show support for the MTS and elements within it, there was a clear requirement for more explanation on how developments were to be funded as existing funding were not expected to be enough. This issue was raised by 12 businesses.

PricewaterhouseCoopers stated that there is substantial financial commitment required to deliver the strategy:

“This ambitious plan places significant financial obligations onto TfL, and relies on sustained government support and a wide-ranging efficiencies programme. So despite the straitened fiscal situation and inevitable pressures on central government funding, TfL must defend vigorously its settlement with government. Equally the efficiencies programme must be delivered. Reducing TfL internal and operational costs appears to be a priority, and rigorous cost and project management will be essential.”

They then went on to state areas where value for money for the transport network could be improved.

Land Securities also recommend that new methods of funding be introduced:

“We have seen the response prepared by London First and endorse its contents. In particular we support the view that the strategy should include a proposal to develop and promote new funding mechanisms and procurement strategies to allow important but unfunded projects to proceed. This could include Tax Increment Financing.”

In relation to cross river developments in the East London Sub Region, AEG Europe identified *“a need to include a proposal to develop and promote new funding mechanisms and procurement strategies to allow important but unfunded projects to proceed.”*

Whilst Govia were mindful that the integration of underground and overground train services *“must be viewed in the context of affordability and value for money.”*

Other businesses were uneasy that specific areas may be unfairly burdened with funding. Wood Wharf expressed this issue along with Amba-QA who, for example, who stated that:

“Motorists already pay a fortune to use the roads. We pay the government over £40 billion a year. If new facilities are needed in London, like river crossings, the Mayor should demand more of our own money back from the government. The GLA doesn’t give value for money in what it takes from our council tax in London. The Mayor should look to cut down on waste before he tries to charge motorists more. He might make economies in other areas, such as officials’ high salaries.”

Integrating London’s transport system and services

Comments relating to an integrated transport system were on the whole positive, with nine mentions amongst businesses. PricewaterhouseCoopers believed that:

“ . . . the strategy also sets out sensible measures to better integrate the management of the transport network across London to facilitate the connectivity of the modes.”

NED Railways Ltd demonstrated their support:

“We are committed to improving this whole journey, for all our passengers, and see the Mayor’s Transport Strategy as an opportunity for this to be achieved in London. Interchanges, such as rail stations, should be at the heart of this approach for London.”

Additionally, Colin Buchanan and Partners welcomed the ideas presented for integrating the transport system but said that things should go further than the extension of Oyster PAYG to national rail services, suggesting Oyster could be extended to taxis and minicabs and that more could be done with respect to multi-modal information provision.

Other supporters included AEG Europe, Barking Riverside, Crowd Dynamics Limited and Wood Wharf – each stating specific examples of where a more integrated approach would assist in their area of interest.

BA expressed support for the integration of transport systems with the caveat that:

“ . . . if high speed rail is to remove the need for some domestic flights then the interchange with Heathrow must be well-planned to ensure efficient and competitive transfers between rail and air. Without such an interchange transfer passengers would simply take flights from their regional airports direct to other EU hub airports instead.”

Surface access to airports and High Speed 2 rail

The issues around surface access to airports and high speed rail were of concern, with eight comments made. There was support for the MTS proposals, for example Colin Buchanan and Partners said:

“Access to Heathrow remains poor for staff and travellers, we support the creation of an extensive PRT⁴⁰ network not only linking all parts of Heathrow and its carparks but also with surrounding areas/hotels and transport hubs.”

NED Railways Ltd outlined potential benefits that they could see:

“The development of High Speed Two, possibly based at Euston and in conjunction with the High Level Output Statement, offers the opportunity to build innovative new approaches to transport integration at the start of the process.”

AEG Europe stated the opportunities that these improvements could provide for their business:

“The global status of The O2 will be further enhanced from mid 2010 with direct connections to Stratford City and Stratford international stations via the Jubilee Line. This will provide excellent links via the

⁴⁰ Personal Rapid Transit

High Speed 1 service to the southeast and mainland Europe. AEG would also support locating the High Speed 2 terminal at Stratford. This will provide excellent interchange opportunities for Crossrail, HSI, enhance the orbital connectivity and in turn relief congestion within Central London.”

DHL expressed “*strong interest*” in the development to enhance road links between Heathrow airport and the rest of the city, which would benefit their business.

Wood Wharf Group were concerned that HSR services were accessible to businesses:

“Wood Wharf welcomes the support given to the development of international rail services but it is equally important that HSR services are accessible by the business community that relies on such links. Eurostar services capture a high proportion of business travel to Paris and Brussels and it is vital that companies in the Isle of Dogs can take full advantage of high speed rail links. The policy refers to ‘some’ trains stopping at Stratford but this should be more explicit.”

Crossrail 1 & 2

It was evident that Crossrail developments were also supported by businesses with seven responses relating to this aspect of the strategy.

Looking at the bigger picture, PriceWaterhouseCoopers stated that:

“It is right that the Mayor’s priority is to ensure the delivery of the transport plan to 2018 focusing on the major capacity improvements from Crossrail and the London Underground line upgrades.”

Equally, NED Railways Ltd suggested that

“Creating new capacity will enable Overground rail stations to be treated more as ‘hubs’ in the overall network, closely integrated with other modes – as in the case of Crossrail (both Crossrail ‘1’ and Crossrail ‘2’), the DLR extension to Dagenham Dock, Stratford International and Thameslink.”

Development Securities gave positive feedback on this element of the policy. Whilst BA supported this aspect of the MTS due to the benefit that Heathrow will get from it.

Some businesses also raised concerns. For example, although Wood Wharf Group “*fully supports the Crossrail proposal and the commitment to its opening in 2017*” they also stated that:

“The success of Crossrail depends upon it being as fully accessible as possible and this requires improvements to interchange facilities at several stations in central London.”

AEG Europe and Barking Riverside were supportive in their comments, but still had concerns about meeting specific development requirements in their operating areas.

APPENDIX A

Questionnaire

PLEASE COMPLETE THE QUESTIONNAIRE, FOLD IN HALF, SEAL ALONG GUMMED STRIP AND POST

Q1 Questions about you

Do you live in London?

- Yes No

What is your home postcode?

Do you work in London?

- Yes No

What is your work postcode?

In what capacity are you responding to this consultation?

PLEASE TICK ONE:

- As an individual
 As a representative of a business or organisation

Are you:

- Male Female

What is your ethnic background?

PLEASE TICK ONE:

- Asian/Asian British
 Chinese
 White
 Black/Black British
 Mixed ethnic background
 Other ethnic group

What is your age group?

PLEASE TICK ONE:

- Under 16
 16-24
 25-44
 45-64
 65+

Q2 Transport for London is proposing a range of measures to improve travelling in London for each aspect listed below please tick all those that you consider would bring most benefit:

Tube

- Providing air conditioning on trains
 Expanding step free access
 Building more Tube lines
 Providing more frequent trains
 Delivering a more reliable service
 Other (PLEASE SPECIFY)

Rail

- Enabling passengers to use Oyster pay as you go across all rail in London
 Providing more capacity on the DLR and Tramlink
 Building more rail lines
 Improving the cleanliness, security and quality of suburban rail stations
 Creating an improved service for Inner and Outer London
 Other (PLEASE SPECIFY)

Interchange

- Reducing the need to come in to central London to interchange for journeys to other places
 Improving the design and quality of areas around stations and termini
 Redesigning stations to provide more capacity
 Providing more facilities to drop off car passengers so they can continue their journey by public transport
 Other (PLEASE SPECIFY)

Cycling

- Providing more secure cycle parking
 Introducing specially designated Cycle Superhighways
 Introducing Cycle Hire Schemes
 Providing more cycle training
 Other (PLEASE SPECIFY)

Walking

- Providing more information about journeys that could be undertaken by foot
- Improving the quality and design of streets
- Improving signs and other information to help people find their way better
- Tackling crime and fear of crime
- Improving pedestrian access to stations and improving safety in surrounding areas
- Other (PLEASE SPECIFY)

Buses

- Providing more information at bus stops
- Developing a New Bus for London
- Phasing out the bendy bus
- Ensuring all new buses from 2012 have environmentally friendly engines
- Other (PLEASE SPECIFY)

Information

- Providing travel planning and guidance to assist people in deciding how to travel
- Enhancing the provision of up to the minute information, for instance online and by text message
- Improving the travel information assistance provided at stations
- Introducing journey planning tools which are focused on specific areas, eg town centres
- Building consistent signage and information for cyclists and pedestrians
- Other (PLEASE SPECIFY)

Better streets

- Encouraging the uptake of low emission vehicles
- Removing unnecessary signage and clutter
- Introducing shared space schemes to improve the look and feel of streets and make them safer
- Using high quality and attractive materials for pavements and streets
- Other (PLEASE SPECIFY)

Freight

- Promoting use of the Thames and other waterways for freight
- Encouraging out-of-hours delivery
- Building more centres to transfer freight to cleaner vehicles for local deliveries
- Other (PLEASE SPECIFY)

The Thames

- Introducing Oyster on passenger services
- Raising service standards and making them consistent with other public transport
- Introducing more stops
- Providing more environmentally friendly boats
- Other (PLEASE SPECIFY)

Q3 Additionally, there are some particular issues we would like your opinion on; please consider the following two questions:

Demand management

Despite all the improvements outlined in the draft Strategy, increasing population and demand for travel mean congestion and CO2 emissions might still be a significant problem for London. The draft Strategy proposes that in this case it may be necessary to consider a fair system of road user charging to reduce congestion.

To what extent do you agree or disagree that a fair system of managing demand for road use should be used if necessary?

- | | |
|---|--|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Disagree |
| <input type="checkbox"/> Agree | <input type="checkbox"/> Strongly disagree |
| <input type="checkbox"/> Neither agree nor disagree | <input type="checkbox"/> Don't know |

Western Extension of the Congestion Charging scheme

The draft Strategy proposes to remove the Western Extension of the Congestion Charging scheme after introducing measures (including improved traffic control systems and a Roadworks Permit Scheme) to mitigate as far as possible the impact of its removal.

To what extent do you agree or disagree with the proposal to remove the Western Extension?

- | | |
|---|--|
| <input type="checkbox"/> Strongly agree | <input type="checkbox"/> Disagree |
| <input type="checkbox"/> Agree | <input type="checkbox"/> Strongly disagree |
| <input type="checkbox"/> Neither agree nor disagree | <input type="checkbox"/> Don't know |

Q4 Any additional comments about any aspect of the draft Mayor's Transport Strategy

Data protection statement

TfL and the Mayor of London will use the information you have supplied in response to this consultation only for the purpose of assessing the proposals. Responses may be made publicly available. However, personal details will be kept confidential. You do not have to provide any personal information, but this information will help TfL to understand the range of responses. For examples, responses may be analysed by postcode areas to identify local issues.



APPENDIX B

Code Frame

Code Frame

A, B, C, etc are theme areas

A1, A2, A3, B1, B2 etc are comment codes within the theme areas

Column PQ: Y = corresponds directly to section or question on public questionnaire;
* = code from other section included for ease of use

	PQ	Modes
A	Y	Tube/London underground
A1	y	More reliable/longer hours tube service
A2		Improvements to tube stations/staffing
A3	y	Tube frequency/ capacity
A4		Tube line extensions
A5	y	Air con on tube
P2	*	Physical accessibility improvements, eg step-free tube, bus ramps
A6		Other (Tube)
B	Y	Rail (incl. National Rail services, TfL Overground, DLR and Tramlink)
B1	y	Improved service levels (staffing, clean, secure)
B2	y	Increased rail capacity
B3	y	Building more rail lines
B4		High Speed 1/ rail links to Europe
B5		TfL Overground rail (inc East London Line, North LL)
B6	y	Integration of TfL/NR services eg Oyster PAYG on all rail
B7	y	Improved services inner + outer London
B8		Crossrail 1 & 2 (inc Chelsea-Hackney line)
B9		DLR comment
B10		Tramlink comment
M2	*	Surface access to airports and High Speed 2 rail
B11		Other (Rail)
C	Y	Interchange
C1	y	More capacity at interchanges
C2	y	Improving the design and quality of areas around stations and termini (inc car drop-off)
C3	y	Reducing the need to come into central London for Interchange for journeys to other places
C4		Integrating London's transport system and services
B6	*	Integration of TfL/NR services eg Oyster PAYG on all rail
C5		Other (Interchange)
D	Y	Cycling
D1	y	Cycle parking
D2	y	Cycle training
D3	y	Cycle Hire Schemes
D4	y	Cycle Superhighways
D5		Borough cycling improvements
D6		Changes to road layout for cycling (cycle lanes, one way sts, gyratories etc)
G1	*	Providing consistent signage and information for cyclists and pedestrians (inc Legible London)
D7		Other (Cycling)
D8		Introduce a compulsory license scheme for cyclists
D9		Prosecute dangerous cycling/cyclists who do not adhere to the laws of the road
E	Y	Walking
E1		Health impacts of walking
E2	y	Pedestrian access to PT and safety
E3	y	Improving the quality and design of streets, removing clutter
E4		Development of key walking routes
G1	*	Providing consistent signage and information for cyclists and pedestrians (inc Legible London)
E5		Other (Walking)

F	Y	Buses
F1		Bus Service/route issues
F2	Y	iBus and information provision
F3	Y	Bus design inc New Bus, Bendy Bus
N2	*	Regs & standards on GLA/public fleet for air quality/CO ₂ /noise
F4		Other (Buses)
G	Y	Information
G1	y	Providing consistent signage and information for cyclists and pedestrians (inc Legible London)
G2	y	Enhancing the provision of live information about transport (eg online and text message)
G3	y	Providing travel planning and guidance to assist people in deciding how to travel
G4		Other (Information)
H	Y	Better Streets and Roads
H1		Parking
H2		Smoothing traffic flow
H3		Roadworks (Permits, lane rental, control of)
H4		Shared space /better streets
H5		Improving the appearance of streets
H6		Making changes to how different road users use the road/roadspace allocation (eg bus,cycle lanes)
D6	*	Changes to road layout for cycling (cycle lanes, one way sts, gyratories etc)
H7		Other (Better Streets/Roads)
I	Y	Freight
I1	y	Delivery hours and loading issues
I2	y	Freight consolidation/ distribution
I3		Environment/noise impacts of freight
I4	y	Water-borne freight
I5	y	Rail freight
I6		Other (Freight)
J	Y	Thames/River Crossings/Blue Ribbon Network
J1		Piers/ Wharves/Sea Ports/stopping points
J2	y	Integrating Thames with other transport (including Oyster)
J3	y	Environmental issues for boats
J4		River crossings
I4	*	Water-borne freight
J5		Other Thames/waterways/ River Crossing comment
L		Taxis, private hire and coaches
L1		Regional, national and international Coach services (general)
L2		Taxis/Black cabs (general)
L3		Private hire/ minicabs (general)
M		Airports/access to airports
M1		Airports general (inc Heathrow 3rd runway, Thames Estuary Airport)
M2		Surface access to airports and High Speed 2 rail
M3		Aircraft and environment/noise
N		Environment, Air Quality & Climate Change (CO₂)
N1		Noise Pollution (General)
N2		Regs & standards on GLA/public fleet for air quality/CO ₂ /noise
N3		Incentives for cleaner vehicles in private ownership (eg cars, road tax)
N4		Local air quality measures including local low emission zones
N5		CO ₂ Emissions (General)
N6		Low carbon infrastructure/tech
N7		Electric vehicles
N8		Adapting to/ Risk Mgt of Climate Change
N9		Transport impact on natural environment
N10		Other environment/climate change comment

O	Y	Western Extension (WEZ) of Congestion Charge and Low Emission Zone (LEZ)
O1		Supports removal of WEZ
O2		Opposes removal of WEZ
O3		Other WEZ (inc mitigation traffic, environment impacts)
O4		Comment on Congestion Charge generally
O5		LEZ (General)
O6		Support Deferment/Suspension of Phase 3 of LEZ
O7		Oppose Deferment/Suspension of Phase 3 of LEZ
P		Accessibility
P1		Public transport and access to services - eg health, education, jobs
P2		Physical accessibility improvements, eg step-free tube, bus ramps
P3		Non-physical improvements eg Information, attitudes
P4		Accessibility Plan/Disability Equality Scheme
P5		Dial-a-Ride
P6		Concessionary fares
T3	*	Fares & ticketing general
P7		Other accessibility comment
Q		Crime, Safety & Security
Q1		Reducing crime and fear of crime in and around transport
Q2		Public Transport Safety (general)
Q3		Road Safety
Q4		Prepare for major incidents & threats
Q5		Other crime, safety comment
R	Y	Demand Management/Road user charging
R1		Further road user charging in London
R2		Reducing the Need to Travel
R3		Smarter Travel (inc workplace and school travel plans)
R4		Car clubs
O4	*	Comment on Congestion Charge generally
R5		Other demand mgt/road user charging
R6		Introduce more Park and Ride schemes servicing Central London
S		Misc & Cross Mode Issues
S1		Orbital Connectivity
S2		Radial Connectivity
S3		Outer London comment
S4		Inner London comment
S5		Comment on local issue
S6		Regeneration/ Economic downturn (general)
S7		Cancelled Schemes (eg Cross River Tram, Thames Gateway Bridge)
S8		Olympic Games 2012
S9		Health impacts of transport
T		Links to other Strategies/ Finances/ General
T1		Working with Boroughs/ LIPs process/Sub-regional plans
T2		Financing transport schemes
T3		Fares and ticketing
T4		London Plan comment (planning issues)
T5		Economic Development Strategy comment
T6		Comment on Integrated Impact Assessment (IIA)
T7		General comment on MTS
T8		Other re Mayor or TfL
T9		Irrelevant