

# LONDON ASSEMBLY

Keith Prince AM, Chairman of the Transport Committee

London Assembly  
City Hall  
The Queen's Walk  
London SE1 2AA

**29 September 2017**

Sadiq Khan  
Mayor of London  
City Hall  
The Queen's Walk  
London SE1 2AA

Dear Sadiq,

I am writing to share the views of the Transport Committee on your draft Mayor's Transport Strategy (MTS).

We welcome the publication of your draft strategy, and would like to thank the Deputy Mayor for Transport Val Shawcross, Walking and Cycling Commissioner Will Norman, TfL Commissioner Mike Brown and Director of City Planning Alex Williams for engaging with us during the consultation period. As you know, we would have appreciated the opportunity to meet you directly to discuss the strategy. The committee remains disappointed that Londoners have been denied the chance to see you questioned publicly about your proposals.

We share your views on the major challenges facing London's transport network. London needs to deliver healthier streets with enhanced opportunities for active travel, to improve the experience of travelling by public transport, and to make effective use of the transport network to help create homes and jobs.

We note the ambitious target you have set for 80 per cent of journeys made in London to be by foot, cycle or public transport by 2041. We agree this is an important objective for the city, although we would also recommend that as well as the overall 80 per cent target, you publish your mode share targets for walking, cycling and specific public transport services, and your intermediate targets for mode share between now and 2041.

Achieving this objective will be challenging, and require sustained investment in a number of areas. In particular, if Londoners are to be persuaded to reduce private car usage, it is vital that effective alternatives are in place throughout the city, especially in outer London. Our general impression of the strategy is that much more detail on your proposals is required to assure us this will be the case.

In this letter, I will set out our views on specific proposals in the draft strategy, particularly where we feel you may need to make changes to your proposals or include additional measures.

## **Walking**

We welcome your target for all Londoners to undertake at least 20 minutes of active travel every day. For most Londoners this would be achieved by walking. We support the measures in the draft MTS to promote walking by improving the street environment (proposal 1), provided each intervention is considered on a case-by-case basis. Going forward, you should provide more detail on what constitutes a 'healthy route' for walking, how many routes you expect to introduce, and by when. German Dector-Vega from Sustrans shared views with us on some of the details that need to be clarified:

"We are not talking about throughput anymore and we need to talk about walking as a mass mover because it is a mass mover. It needs to be direct, efficient, inviting, safe and accessible. I would prioritise the safe and the accessible. You can have a beautiful, very inviting route but if you cannot cross to it, then that is it; it is pointless. The safe and accessible is super-important and the key thing is the junction and the key thing that is blocking the junction design is the prioritisation of traffic, unfortunately, which is still there."<sup>1</sup>

The landmark walking proposal of your election manifesto was the pedestrianisation of Oxford Street. We recently responded to TfL's latest consultation on this topic.<sup>2</sup> As set out there, we welcome the recent move to reduce the number of buses running along Oxford Street. We note, however, that in the draft MTS you have failed to include any details on what the 'transformation' of Oxford Street will involve (proposal 2). While we appreciate the complexity of this issue, it is time now for you to be clear about your vision. Working with Westminster Council, you should come forward with specific proposals for consultation as soon as possible.

## **Cycling**

We support your objective for 70 per cent of Londoners to live within 400 metres of a safe, high-quality cycle route (proposal 3). We would point out, however, that proximity to a cycle route will not necessarily lead to people taking up cycling while other barriers persist. We would urge you to improve the way Londoners are consulted about new cycling infrastructure.

A weakness of your draft MTS with regards to cycling measures is the lack of clarity about what new cycling infrastructure you want to introduce over the period of this strategy. We will be investigating this topic in more depth in 2018 and will share our findings with you in due course. Segregated Cycle Superhighways and Quietways both have their place on London's roads, perhaps in modified forms as we learn more about how this infrastructure is used.<sup>34</sup> Beyond the immediate plans set out in TfL's latest Business Plan, however, it is not clear what your vision is for London's cycling infrastructure. For instance, you could set out what types of infrastructure will encourage take-up among those not currently cycling. As Nicole Badstuber of University College London told us:

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<sup>1</sup> Transport Committee meeting, 12 July 2017.

<sup>2</sup> <https://www.london.gov.uk/moderngov/documents/s65239/Appendix%20-%20-%20Oxford%20St.pdf>

<sup>3</sup> David Kurten AM of UKIP recommends that new cycling routes should not narrow road space for other vehicles, particularly buses, on the basis that this would increase traffic congestion.

<sup>4</sup> The view of Caroline Russell AM of the Green Party Group is that cycling infrastructure such as segregated Cycle Superhighways has proven to be effective at improving safety for cyclists and allowing more efficient use of road space. The Mayor and TfL's priority should be to continue with their plans to roll out further infrastructure upgrades.

“If you look at the Cycle Superhighways, they are often very radial and they are also, once again, trying to bring people in within half an hour from inner London into the city. If we want to encourage a broader section of society to cycle, then we also need to think about what sort of travel they are looking for and where they are travelling and so trying to build more of a comprehensive network which also caters to maybe women or other communities [...] I wanted to point out that we really need to create a network that is not disjointed and that does not have junctions suddenly that are unsafe and put people off because of that.”

The draft MTS discusses your support for future models of cycle hire (proposal 6). We agree that ‘dockless’ cycle hire schemes have the potential to open up opportunities for people to cycle, especially in those areas not covered by TfL’s Cycle Hire scheme, provided the right infrastructure is available to support them. We heard from Stephen Joseph of the Campaign for Better Transport about good practice in Birmingham:

“There is a project called the Big Birmingham Bikes project, which is non-dock bike hire, basically. They have distributed bikes with global positioning system (GPS) trackers to people all over south Birmingham and have been incredibly successful in getting low-income people, Asian people and women on bikes across south Birmingham.”

Recent experience with dockless cycle hire in London shows that these services must be carefully managed to avoid causing disruption to other road users, including pedestrians and other cyclists. Working with London boroughs is vital – in particular there must be clear agreement about where dockless bikes can be left. We will be examining this in our future transport investigation, and will look to make recommendations in our report in early 2018.<sup>5</sup>

The draft MTS states that you will explore options for including e-bikes in TfL’s Cycle Hire scheme, although we understand from our meeting with Will Norman that this has in fact been ruled out for the time being.<sup>6</sup> We believe that making e-bikes more available could help increase cycling take-up, and look forward to seeing further details of the trials that Mr Norman discussed in our meeting.

### **Road safety**

We welcome the commitment to Vision Zero in the draft MTS, with a target to reduce the number of people killed or seriously injured (KSI) on or by a London bus by 70 per cent by 2022, and to zero by 2030 (proposal 10). It is not clear, however, why other modes have a Vision Zero timeframe of 2041; it seems more appropriate to state that you will aim to eliminate all KSIs by 2030. In particular, as well as bus safety, you should have specific targets for increasing walking and cycling safety in the same timeframes.

It is also important to remember, of course, that Vision Zero is not merely a target for KSI reduction; it should be considered a guiding principle for transport planning, under which any fatal or serious injury is considered an unacceptable outcome and all necessary measures taken to avoid it.

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<sup>5</sup> <https://www.london.gov.uk/current-investigations/future-transport>

<sup>6</sup> Transport Committee meeting, 18 July 2017

As you will be aware, we recently published a report on bus safety, *Driven to Distraction*.<sup>7</sup> Implementing the measures we recommended in our report should be a priority, and will help to ensure that you achieve your new targets. In summary, our recommendations included the following:

- TfL should set safety targets for bus operators, as well as reliability targets.
- Performance-related payments for senior TfL staff should be linked to bus safety targets.
- TfL should review bus driver working conditions, and work with operators to reduce the number of distractions drivers face.
- TfL should take direct responsibility for bus safety training, as it has for customer service training.
- TfL should review how bus incidents are investigated in London, considering how to ensure independence and consistency.

We are pleased to see that the draft strategy includes plans to improve motorcycle safety, an issue which has previously been overlooked to some extent (proposal 11). The Transport Committee published a report on this topic in 2016, *Easy Rider*, shortly before you took office. We support the proposals you have made to raise training standards, press for consistency in bus lane access and to accredit courier businesses – we look forward to further details of this work. We will be following up our report at a meeting with TfL and other stakeholders in November. In the meantime, we would urge you to update the Motorcycle Safety Action Plan, which is now outdated and does not reflect these latest initiatives.

### ***Bus network***

We are disappointed that your draft strategy does not provide more detail on how you will re-shape London's bus network (proposal 53). Since your early days in office there have been hints that TfL will undertake a major review of the bus network, but this has not taken place despite falling passenger numbers giving you a clear indication that change is needed. As discussed above, we welcome TfL's changes to bus routes along Oxford Street, but this must be the start of a process, not the end. Nicole Badstuber of University College London told us you need to take bold actions:

“If the Mayor was really serious about wanting to realise the shift that is mapped out with his intentions in the Transport Strategy, he really needs to improve the attractiveness of in particular the bus network. There is mention of, for instance, extending the bus priority lanes and maybe putting some in where, after review, it was highlighted that there was a need for it, but you need a bit more bold action here. Yes, we need to create a bus priority network so that there are not pinch-points at which buses are still stuck and you have a lot of bus bunching, which also impacts on the reliability of the service provided and the travel times.”

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<sup>7</sup> <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/driven-distraction-tackling-safety-london>

We investigated this topic in 2016-17. In our recent report, *London's bus network*, we discussed how TfL could improve the design of the bus network and deliver increased usage.<sup>8</sup> Our proposed action plan included the following key points:

- TfL should redistribute bus service capacity from central to outer London. This is necessary to enable the reduction in car usage that is vital for your mode share target. In your final MTS you should specify how much capacity will be redistributed to outer London, and over what period, and confirm plans to introduce more orbital routes.
- TfL should move towards a more efficient network design based on the feeder/trunk model. This would involve shorter, local bus routes connecting people to high-capacity, express services on major corridors.
- TfL should reform the bus tendering process. The current system is a barrier to delivering a new approach to buses. This could involve multi-route tenders covering all services on a particular corridor.
- TfL should improve the bus experience to attract new passengers. This should include providing wi-fi on board buses, improving passenger information and making interchange between buses easier.

The draft MTS also discusses demand-responsive bus services, which would have flexible routes designed in response to real-time passenger demand (proposal 87). We understand several firms are preparing to introduce these in London. We support the proposal to explore the potential of these services, as they could contribute to the necessary increase in service capacity in under-served areas. We will be considering this topic further in our ongoing investigation into future transport technology.

### **Traffic congestion**

Traffic congestion is increasing across London, as we found in our recent investigation of this topic. In our report, *London Stalling*, we recommended that you should:<sup>9</sup>

- Reform the Congestion Charge to target congestion more effectively, and develop proposals for a wider road pricing scheme that could integrate all existing road charges.
- Support boroughs developing proposals for workplace parking levies.
- Encourage more delivery consolidation and reduce restrictions on night-time delivery.
- Pilot a ban on personal deliveries to staff on TfL premises, and modify TfL's approach to 'click and collect' at tube stations to include a greater number of retailers.
- Assess the congestion impact of your proposals to allow TfL to cap the number of private hire licenses it issues.
- Conduct analysis of the congestion impact of TfL's Road and Transport Enforcement Team.

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<sup>8</sup> <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/londons-bus-network>

<sup>9</sup> <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/london-stalling-reducing-traffic-congestion>. David Kurten AM of UKIP dissented to recommendations on the Congestion Charge, road pricing, workplace parking levies and the Road Modernisation Plan. Steve O'Connell AM of the GLA Conservatives dissented to the recommendation on road pricing. Details are available on our website.

- Conduct analysis of the Lane Rental and London Permit schemes for roadworks.
- Undertake more effective planning of Road Modernisation Plan schemes in order to minimise the congestion impact during construction.
- Conduct analysis of the pilot scheme displaying traffic notices on buses.

In the Memorandum of Understanding on devolution you agreed with the Government and London Councils in March 2017, it is stated that:

The GLA will commission an independent study that will work with TfL to identify the key causes of increased road congestion in central London over the last 5 years, with a particular focus on bottlenecks, and will identify a set of prioritised actions that will improve journey times.

We understand that the independent congestion study will be concluded before the end of 2017. The final version of your strategy should reflect the findings of the study, which should be published.

### ***Freight***

We welcome the focus on reducing freight traffic in the draft MTS (proposal 15). We support your ambition to ensure all of London is within a 30-minute drive of a construction consolidation centre. This will be difficult to achieve, however, so it is vital that TfL is prepared to play an active role in bringing organisations together to ensure new centres are established. As we heard from Richard Dilks of London First:

“There are welcome ambitions in here about consolidation centres and about measures that are going to help freight reduction. Actually achieving those is difficult going. It is a difficult co-ordination piece and there is a very live question for the Mayor, the Greater London Authority and TfL as to what sort of role they take on this. How interventionist do they get? Do they put real money into this? Are they striking bigger and bolder partnerships with other players to achieve consolidation and freight efficiency? It does need a guiding mind—freight—which it broadly lacks at the moment.”

Personal deliveries also cause an increasing amount of freight traffic. We understand that TfL has banned staff from receiving personal deliveries at work, something that should be considered across the GLA Group. TfL should take the opportunity to quantify the impact of this new policy, and share the evidence with businesses in order to promote a reduction in delivery traffic. TfL should also use its estate more effectively to enable ‘click and collect’ services at Tube, rail and bus stations, potentially removing the last mile out of many freight journeys.

We note that the draft MTS does not discuss drones and droids, as a method of making personal deliveries that could help take traffic off the roads. Although the scale of this opportunity is not yet proven and there are barriers to drone deliveries in built-up areas, it is important that you explore the potential congestion impact of this technology. We will be considering this topic further in our future transport investigation.

## ***Road charges***

You pledged in your manifesto not to increase the level of the Congestion Charge, and we accept it is important to keep this promise to Londoners (proposal 18). London led the world in the introduction of the Congestion Charge, and for a decade it had the effect of minimising traffic in central London and allowing road space to be used for sustainable modes. With the recent increase in congestion, its usefulness appears to be waning. The main weakness of the Congestion Charge is that it charges a flat rate to all drivers entering the zone, creating a perverse incentive for people to drive more once they have paid. We do not propose specific changes here but we would support a review of the pricing structure of the Congestion Charge, in particular to consider differential charging for peak and off-peak driving.

Regarding the potential introduction of a wider road pricing scheme, we note that you will not bring forward road pricing proposals in this term (proposal 19). We recognise this is a controversial topic and views differ on the committee about whether to implement road pricing. If you are considering introducing road pricing after 2020, then proposals should be developed and published during this Mayoral term in order to allow Londoners to consider the plans. Preparatory work by TfL should consider the potential congestion impact, cost and civil liberties implications of road pricing.

There is a range of views on the committee regarding your proposals for the Silvertown Tunnel (proposal 88). A majority of Members are broadly supportive of the construction of the tunnel as one way of improving cross-river connectivity in east London. Liberal Democrat and Green Members do not support the construction of Silvertown Tunnel. Views differ across the committee on how the scheme should be funded. In general, Members believe it is important that if you proceed with proposals to toll the Silvertown and Blackwall tunnels, you should take steps to avoid an increase in congestion at other crossings, such as the Rotherhithe tunnel.

## ***Car clubs***

We support the expansion of car clubs in London (proposal 17). Car clubs could be particularly beneficial to your modal shift objective if they are expanded in outer London—alongside other measures like an increase in bus capacity—where coverage is relatively sparse. Clearly, some private parking provision would need to be dedicated to car clubs in order to allow this to happen, and on-street charging points would be needed to enable car club fleets to go electric. TfL should work with boroughs to determine how to achieve the best solutions for each locality.

## ***Accessibility***

We welcome TfL's ongoing commitment to deliver step-free stations (proposal 52). We believe your plans could be more ambitious, however. We have noted from our discussions during the consultation period that TfL is seeking to implement station upgrades more cost-effectively than previously. If this is achieved, the savings should be re-invested in the upgrade programme so more stations can be made step-free. It is also vital that TfL invests in the maintenance of station facilities such as lifts and escalators. As we heard from Faryal Velmi of Transport for All:

“We like the fact that we have heard [the Deputy Mayor for Transport] talk about the use of perhaps a different way of looking at how stations can be made step-free, not to do it on the cheap but look at more cost-effective ways. That is really important. Supplementing that as well, we need

to look at how quickly lifts and escalators are maintained because there is nothing more frustrating than having had the investment in a Tube station to get the lifts, to get it accessible and then the lift is out for months.”

Improved accessibility for passengers with a sensory impairment is equally important. The Transport Committee published a report, *Leading the way*, on this topic in early 2016, and we urge you to consider our recommendations.<sup>10</sup> Most importantly, we would stress that accessibility for those with a sensory impairment depends on the provision of staff who are well-trained, visible and available to help, across the transport network.

### ***Door-to-door services***

There is a short discussion in the draft MTS on door-to-door transport services, but no specific proposals for what you will do to improve them. We find this both surprising and concerning, as there is a clear need for improvement in these services and a strong consensus developed over many years on the steps that need to be taken. As we recommended in our recent report, *Door-to-door transport in London: Delivering a user-led service*, integrating services such as Dial-a-Ride, Capital Call and Taxicard should be a priority for TfL and its partners.<sup>11</sup>

We welcome TfL’s response to our report and the decision to explore a pilot programme combining Taxicard and Capital Call in two boroughs. However, we fail to see any meaningful progress toward integration of the journey booking process, for instance, or a commitment from TfL to deliver this. We appreciate that TfL Board member Anne McMeel is now leading on this issue for TfL, and urge you to come forward as soon as possible with a renewed plan for integration with specific, timed actions.

### ***Private hire services***

There are a range of views on the committee about your proposals for private hire services, reflecting the challenge of balancing consumer choice with the need to tackle congestion in London. A majority of Members support your proposal to lobby for a cap on the number of private hire licenses that can be issued in London and a ban on cross-border hiring (proposal 73). There is a range of views among Members on the possible removal the private hire exemption from the Congestion Charge. Liberal Democrat, Green and UKIP Members support this proposal. The Labour Group would support a review into the proposal. The GLA Conservative Group opposes a private hire cap and the removal of the exemption.

We are unanimous in urging you to implement the recommendation from our congestion report, to publish an analysis of the congestion impact of the proposed cap. You should also publish your feasibility study into the removal of the Congestion Charge exemption. These steps are necessary in order for an informed debate to take place about these measures.

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<sup>10</sup> <https://www.london.gov.uk/assembly-publications/leading-way-travelling-sensory-impairment-london>

<sup>11</sup> <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/door-door-transport-london-delivering-user-led>



## ***Crossrail 2***

Since your draft MTS was published, we have seen the announcement from the Department for Transport regarding the Government's support for the Crossrail 2 scheme. The Government's proposal that the GLA fund half of the scheme's costs during the construction phase creates a significant financial challenge for you and TfL. It is far from clear how and whether you will be able to meet this. We would expect your final strategy to reflect this changed situation and set out your plans for delivering the scheme.

## ***Autonomous vehicles***

We are currently investigating the potential benefits and risks of autonomous vehicles in our future transport investigation. It is right that you have set out the ways in which this technology could exacerbate traffic congestion in London – this would need to be carefully monitored. In our initial meeting with experts and stakeholders on this topic we also heard about some of the potential benefits of autonomous vehicles, including using road space more efficiently, making roads safer, and increasing accessibility for disabled people. There is an opportunity for autonomous vehicles to become a shared resource, much more so than the private car is at present, which should be encouraged. We will continue to explore these issues and share our findings with you in early 2018.

We hope you will consider incorporating our suggestions for the strategy and look forward to further discussions with you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Keith', with a horizontal line underneath it.

**Keith Prince AM**  
**Chairman, Transport Committee**