

Regeneration Committee: Written submissions received
for the investigation on transport-led regeneration
(TfL's Growth Fund)

Ref	Submission Name	
TS1	Just Space	2
TS2	TfL	6
TS3/TS3a	Camden Town Unlimited	16
TS4	Royal Town Planning Institute	22
TS5	Royal Borough of Kensington & Chelsea	25
TS6	London Borough of Lambeth	27
TS7	Lea Valley/Poplar Joint Programme Board	31
TS8	Alan Taylor's Bus and Cycle	33
TS9	Friends of the Earth	34

Just Space submission to Assembly Regeneration Committee hearing 2 July 2015 on Transport and “regeneration”

Background: Just Space has been invited to contribute as a network of community organisations to this enquiry. The request was

The focus of the investigation will be to find out exactly what is the Mayor’s strategy for investing in transport improvements that will promote regeneration. The premise is that, while TfL invests in projects primarily to improve transport capacity, it also invests on the basis of supporting access to development sites which will generate future economic returns. Our focus would be on how transport supports local regeneration, rather than the economic impacts new transport infrastructure may have on the city as a whole. At the moment, it is unclear how the Mayor and TfL decide which transport projects to support on the basis of local regeneration, and what the proven regeneration impacts of transport infrastructure are.

Response:

Who we are

Just Space is a network of community organisations which support each other in engaging with the planning and related policy consultations in London, at levels from neighbourhoods through Boroughs to the whole GLA. It has been active in supporting many dozens of community groups to make representations and to appear at the various London Plan EiPs and often makes its own representations where there is a consensus among member organisations.

This statement is distilled from the many submissions which Just Space and its member organisations have made on relevant issues in recent years. Just Space will be delighted to enlarge on the points made or to answer the Committee’s questions and will also be encouraging others to make submissions.

Information vacuum: missing research

The Committee asks what are the “proven regeneration impacts...” There is no serious research-based answer to this question because the relevant monitoring and research has not been done.

Just Space and many academics have been arguing for some years that a major weakness in regeneration policy is the lack of longitudinal studies which would track positive and negative impacts of “regeneration” schemes, including displacement - for households and enterprises alike. Without this data it is impossible to determine whether changes in an area (comparative snapshots, e.g. from census data) are changes experienced by the original people / enterprises or represent replacement of previous by new populations. This is a VERY serious matter. The London Assembly should call for or commission such studies AND it should make representations to research funding bodies (ESRC, EPSRC) pointing out the need.

The UCL Urban lab “Pamphleteer #2” contains a call for such research at pp 24-27. (Note that the two maps in the same issue showing displacement from the Heygate estate have their captions switched). Free download at <http://www.ucl.ac.uk/urbanlab/research/urban->

[pamphleteer/UrbanPamphleteer_2.pdf](#)

Prof Loretta Lees (lately of King's, now University of Leicester) is thought to be doing a study of this type, though we are not sure how many regeneration projects she is studying nor over what timescale, nor whether transport figures specifically.

Essence of the impact problem

On the specific issue of transport improvements triggering or supporting “regeneration”, transport improvements - especially high-capacity rail ones - do indeed trigger land and property price increases and thus speculation and development. Whether these effects constitute “regeneration” in the sense of benefitting existing low- and medium-income residents and established enterprises is an open question. Often in recent years the reverse seems to be the case. Anecdotally the effects of the Overground at Haggerston and Dalston, and impending pressures at Peckham and elsewhere seem to be mainly or wholly negative. In terms of the questions posed, this relates to how “economic return” is conceptualised and estimated - simple profitability or wider social and economic benefit.

Just Space has always argued that “regeneration” schemes should not be launched until after a social impact analysis had shown them to be beneficial to the target populations of the area.

Just Space has also always argued that “regeneration” schemes should not be approved where there could be a net reduction in the availability of social rented housing. Evidence from our groups convinced the independent panel of inspectors at the EiP on the London Plan who recommended a policy change “These schemes should seek to achieve no net loss of affordable housing...” (EiP Panel Report 2011). The Mayor, however, chose not to accept the recommendation.

Similarly there are grave concerns about the losses of affordable workspace being experienced in many parts of London via the pressure of property prices rises and “regeneration” schemes and the Just Space Economy and Planning Group has given evidence¹ on these problems too – which are expected to worsen if the Mayor's current thinking in the Infrastructure Plan 2050 is embodied in policy.

Problems in land value capture

There have been attempts all over the world to “capture” land value uplifts resulting from transport improvements – initially by private companies buying greenfield land and then developing transport and buildings (mainly housing) in the USA and when London's Metropolitan Line was built. In such cases the key is for large areas of land to be acquired before the effects of transport improvement have to be reflected in the purchase price. Where the development of transport is by a public body the same applies. This does not

¹ <http://justspace.org.uk/category/economy-and-planning/> various documents and research links.

seem likely to be a viable strategy in London in the near future because London does not have large consolidated land ownerships, at least within the green belt.

The New Towns Acts, if used for the purpose, could enable land to be acquired at existing use value.

The alternative - —and in many ways simpler— approach is through a system of land value taxation which, automatically and without special action, would capture land value uplift wherever it occurs. The case for this kind of taxation is very strong but it has not yet appeared on political agendas in England.

What we have in London is two unsatisfactory approaches to capturing land value uplift, both of which cause serious concern to Just Space and community groups and local businesses in affected areas:

- (i) Attempts by transport undertakings (TfL or others) to capture land value uplift on the bits of land they happen to own directly – at or alongside stations. Because station development is expensive and transport operators typically own only small adjoining sites, this tends to lead to outstandingly dense development, especially where the operator is trying to recoup the costs of an over-specified station, as at Dalston Junction. In this kind of case the pressure to cover costs can pre-empt resources for other purposes – especially for genuinely affordable housing which was, at Dalston, squeezed to zero on the principal development. Our experience from the impacts of the East London segment of the Overground ring is that prices of property in the surrounding areas have risen dramatically but with the displacement effects probably outweighing any housing benefits to the pre-existing communities. The optimism expressed by Lord Adonis about the scope for property values to pay for BOTH transport improvements AND the affordable housing London needs is unfounded.
- (ii) use of CIL, in parallel with Section 106 to capture some part of the development value arising, though only on new developments. Just Space organisations have expressed grave concern in recent years about the way in which infrastructure costs are thus placed in competition with social facilities and social housing provision, and in ways which tend to relegate social housing contributions to a residual share – often 0% - of what can be found through the infamous “viability” testing regime in which profit considerations trump all other objectives.

Conclusion and next steps

In summary: Community, housing and neighbourhood groups in London have major concerns that transport investment – essential for their transport benefits – tend in private market conditions to lead to mainly negative impacts on incumbent communities and the local economies of areas. Built-in and powerful safeguards to inoculate “regeneration areas” against these ill effects are essential.

Just Space would be delighted to amplify these comments and to attend future meetings to give evidence and to arrange meetings for the Committee or its Officers in affected areas – especially Peckham, Dalston, Tottenham, Ealing.

22 June 2015
justspace.org.uk

contact for this document: [REDACTED]
contact for Just Space generally [REDACTED]

MAYOR OF LONDON

Gareth Bacon AM

Chairman of the Regeneration Committee
City Hall
The Queen's Walk
London SE1 2AA

Date: 25 June 2015

Dear Gareth

Regeneration Committee – transport-led regeneration

Thank you for your letter of 28 May regarding the Committee's investigation into transport-led regeneration and your request for information ahead of the Committee's meeting on 2 July.

I have enclosed a short document which addresses the points raised in your letter about Transport for London's approach to investing in schemes with impacts on regeneration and growth. It makes clear that TfL takes its responsibilities for supporting the city's growth very seriously and has developed specific methods for ensuring schemes with merit are brought forward and delivered.

I look forward to discussing this important subject with you and your colleagues further on 2 July.

Yours sincerely



Isabel Dedring

Deputy Mayor for Transport

1 London's Growth

- 1.1 London is bigger than it has ever been before, surpassing its previous record (set in 1939) with a population of 8.6 million people and growing by the equivalent of two full buses every day or two full Tube trains every week. The capital is projected to reach 10 million people – the OECD definition of a 'megacity' – by 2030.
- 1.2 Meeting the demands of that expanding population will require a focus on growth and regeneration across the city, to provide not only the homes but also the employment that new Londoners will need.

2 The role of transport – and TfL – in supporting growth and regeneration

- 2.1 A growing population means more travel to work and for education; more shopping trips and leisure travel; and more deliveries of goods and construction traffic. As a result, TfL estimates there will be 11 billion annual trips in London on its roads, buses and railways by 2030. This means that there will be on average 5 million more trips made on London's transport network every day in 2030 than there are today.

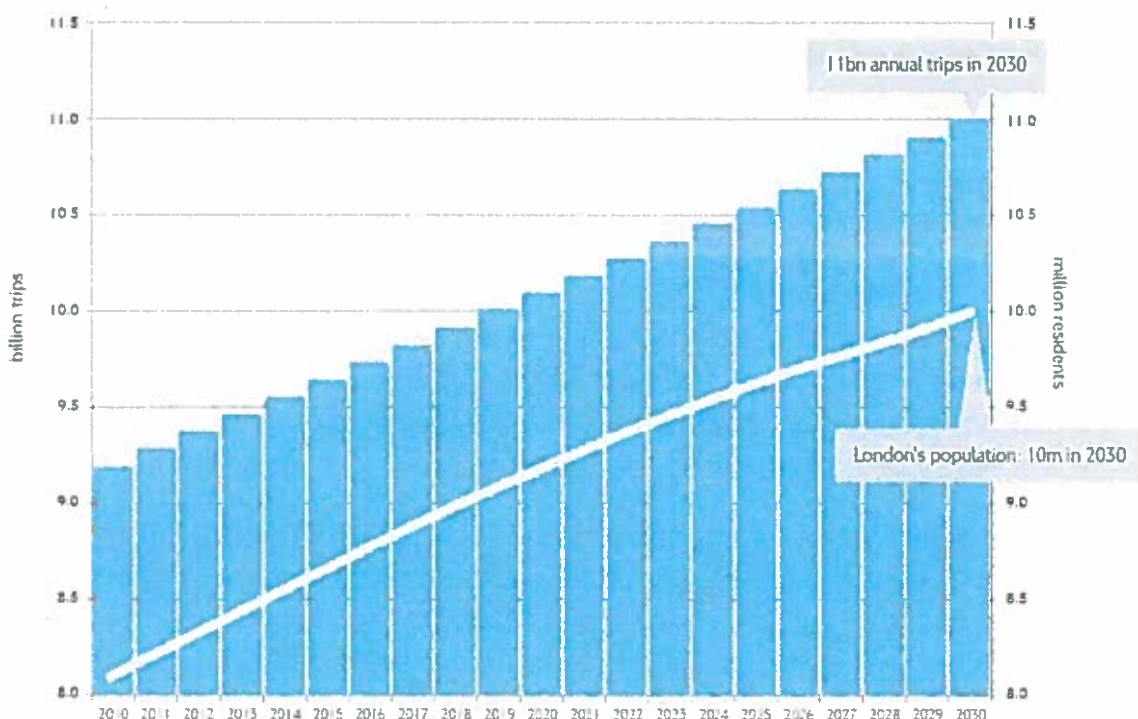


Figure 1: London population and trip forecast to 2030

- 2.2 This growth represents both challenges and opportunities for TfL. TfL is delivering major rail investment programmes and the unparalleled £4bn Roads Modernisation Programme to deliver the enhancement and expansion of its existing networks that

will be necessary to cope with so many more people moving around the transport network every year.

- 2.3 This includes a suite of new Tube upgrades and initiatives such as the launch of Night Tube services in September 2015 that will create at least 2,000 new jobs and add £360m to the economy; a full upgrade of the Piccadilly line planned to start in 2019 that will increase capacity on the line by 60 per cent; the Northern Line Extension that will open in 2020; and major station transformations at Tottenham Court Road, Bond Street, Victoria and Bank.
- 2.4 The Roads Modernisation Programme includes major schemes as well as over 160 smaller improvement schemes; key junction improvements and traffic light modernisation; and the modernisation and maintenance of 1,800 bridges and 12 tunnels, 9,000,000m² of carriageway and more than a thousand miles of pavements and cycle lanes.
- 2.5 While helping meet the challenges of growing demand, that investment also allows TfL to support the city's growth. It has repeatedly been shown that new transport links can unlock homes and jobs across London, and TfL is prioritising its investment to maximise these opportunities.

3 Growth Areas Programme

- 3.1 The Growth Areas Programme identifies specific areas of the capital where growth can be supported by direct transport intervention. The list of these areas includes Opportunity Areas and Intensification Areas designated in the London Plan; a number of the Greater London Authority (GLA) Housing Zones; and some sites which have not received any official designation but have particular growth potential. There are currently thirty-two 'Growth Areas' monitored as part of the TfL Growth Areas Programme, which are shown in Figure 2.
- 3.2 In the case of Opportunity Areas, the development and publication of an Opportunity Area Planning Framework (OAPF) creates a forum through which specific transport interventions that will unlock new homes and jobs can be identified. Each OAPF is a comprehensive document that is supported by detailed studies considering topics including development capacity and transport.
- 3.3 For areas not designated as Opportunity Areas, Transport for London officers routinely work closely with colleagues at the GLA and representatives from the boroughs to develop appropriate transport policies to support growth and the assemble funding packages to support the delivery of selected interventions.
- 3.4 The Growth Areas Programme provides a central organisation point for this work on regeneration and growth. Regular meetings of TfL's Growth Areas Steering Group and Investment in Transport Enabling Growth group (both of which include representatives from across the GLA family) allow projects' strategic lead officers to update senior managers and ensure projects are progressing and coordinated with the rest of the programme.

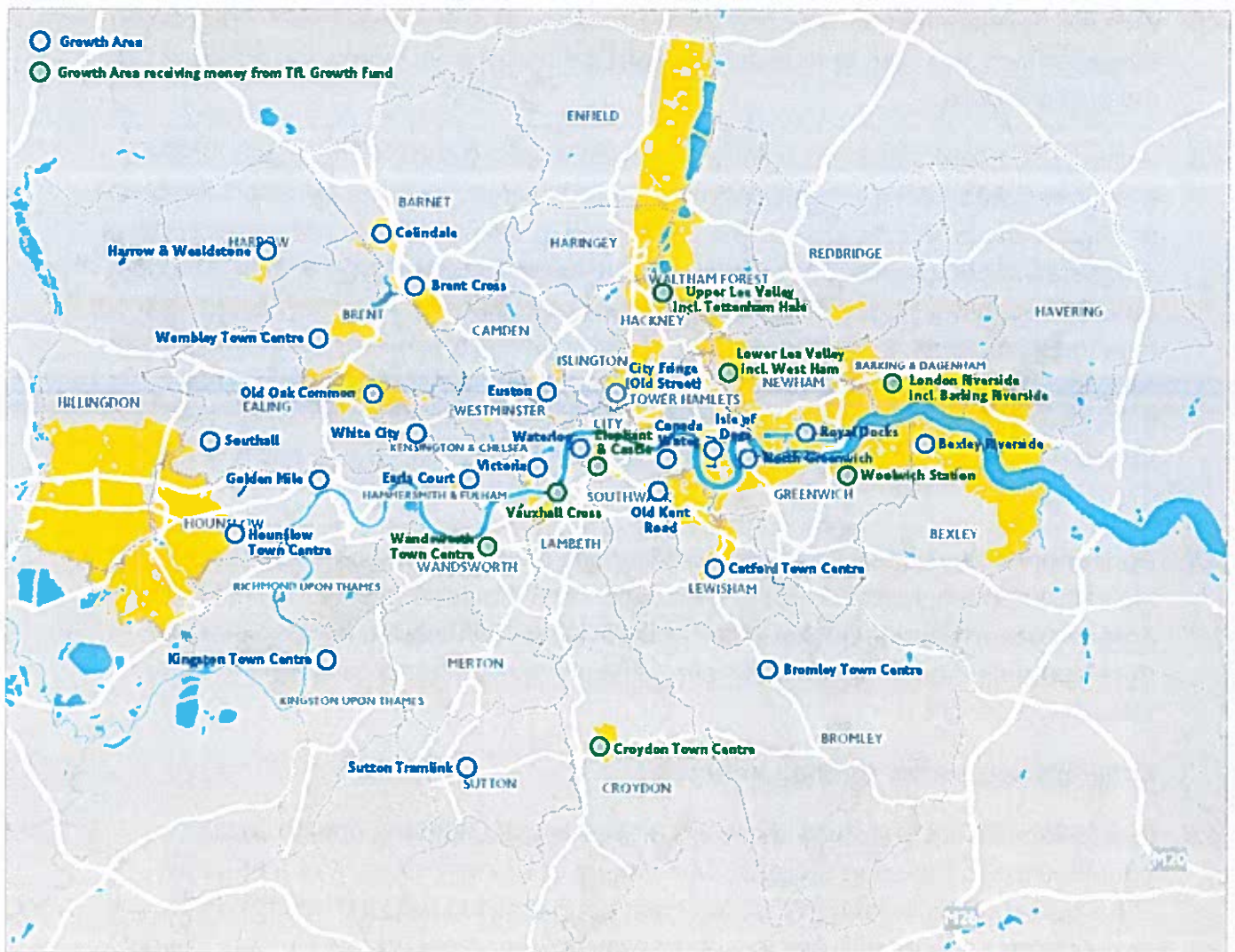


Figure 2: Growth Areas within TfL's Growth Areas Programme

4 Potential funding sources to support transport projects linked to regeneration

- 4.1 A major element of TfL's work to support regeneration and growth in London is identifying and securing funding sources for transport projects that will enable or support development.
- 4.2 TfL seeks where possible to fund transport projects using third-party private sector contributions, but often it is not possible to assemble a complete funding package for a project without a degree of public funding.

Developer contributions

- 4.3 Agreements with developers (and boroughs) can often be used to secure significant contributions to growth-related transport interventions and are the first port of call for assembling a funding package for a project.
- 4.4 TfL is responsible for negotiating appropriate section 106 (s106) agreements with development partners to secure private sector contributions to transport projects. In this capacity TfL actively considers the transport implications of about 300 of the major applications referred to the Mayor each year.

- 4.5 With the development of more and more Borough CIL's this negotiation for transport mitigation can also lead to a discussion with the borough as to how the Borough CIL receipts are used.
- 4.6 It should be noted that there are financial obligations placed on developers beyond what is required for improvements to local infrastructure, and this will affect the ability of TfL and the boroughs to secure contributions to transport projects that may unlock regeneration and growth. For example, TfL is responsible for the collection of funds raised through the Mayoral Community Infrastructure Levy (CIL) which is charged on most developments in London. As part of the original Crossrail funding arrangement with government, TfL has been tasked with raising £600m towards the project through a combination of Mayoral CIL and s106 contributions as defined in the Funding of Crossrail Supplementary Planning Guidance. TfL is on track to achieve this target.
- 4.7 Furthermore, developers' financial contributions towards transport projects are typically not the only matter under negotiation and the need to secure suitable agreements on other factors such as the provision of affordable housing in new developments – and the effect this can have on developments' viability – must be taken into account.

Other private sector funding sources

- 4.8 In addition to CILs and s106, there are other ways of capturing private sector contributions to transport projects. One variant of this is a creation of a Mayoral Development Corporation (MDC) to acquire and develop the land most likely to benefit from a value uplift that is a direct result of the transport investment. The net proceeds of development sales could be used for transport funding. An MDC can also levy its own CIL, reflective of the specific viability circumstances in the area.
- 4.9 Another alternative is tapping into the uplift in values of residential property through taxation mechanisms such as stamp duty. This tax is not currently devolved to local authorities but a case for its devolution to London has been made.

Public sector funding sources

- 4.10 When a development partner or group of developers is unable to provide the full funding for a transport project, TfL will seek the remaining funding from a range of public sector sources.
- 4.11 Different public sector funding sources may become applicable depending on the nature of the project. In some cases funding may be available from central Government or from Government bodies such as Network Rail or the Highways Agency. A number of specific funds are available within the GLA to support regeneration and growth projects, including the Mayor's Regeneration Fund; the Growing Places Fund; and the Housing Zones programme.
- 4.12 If all of these options are exhausted and a funding gap remains, money can be sought from the TfL Growth Fund (or, in specific circumstances, from elsewhere in

the TfL Business Plan) to complete the funding package and allow the project to proceed.

5 TfL Growth Fund

- 5.1 As described above, TfL typically seeks funding first from private sector sources and then from alternate sources including local authorities, central government and the GLA. Given the pressures placed on developers by the planning process (for example through stricter affordable housing targets) it has become increasingly difficult to assemble complete funding packages through these sources alone.
- 5.2 In recognition of this, TfL established its Growth Fund in 2012, allocating £300 million over ten years from the TfL Business Plan for funding transport improvements that will have a direct impact on unlocking growth. A further £60 million was added to the Growth Fund in 2014 (i.e. an additional £30 million per annum to extend the funding in the TfL Business Plan through to 2024).
- 5.3 The funding is to be targeted at those locations where a transport scheme can overcome barriers to development and directly unlock new homes and jobs or regenerate key growth areas. This case is made stronger where growth funding is essential in the timely progression of development. In some cases it may be possible to use the Growth Fund to bridge a funding gap in the short term with an agreement that the funding will be paid back by developers following longer term returns on the development.
- 5.4 The money within the Growth Fund differs from other funding in the TfL Business Plan because of its additional focus on regeneration and growth rather than purely on the transport case for an investment. While regeneration and growth will be a qualitative factor in most TfL business cases, the viability of the transport case and its effect on the overall benefit to cost ratio are paramount. The prioritisation of homes and jobs creation in the allocation of TfL Growth Fund money allows for the progression of projects which, although highly desirable schemes, produce a less favourable transport case through the typical business case appraisal methodology and would be less likely to receive conventional Business Plan funding. An example of this is the reconfiguration of Elephant & Castle junction, which is expected to have a negative effect on traffic flow and has a weaker transport business case as a result, but which will have a very strong positive effect on regeneration and growth.
- 5.5 The allocation of the £360 million Growth Fund was determined by the TfL Leadership Team, after receiving recommendations from the Growth Areas Steering Group.
- 5.6 There are currently 14 schemes with allocations of money from the TfL Growth Fund, supporting in total over 50,000 new homes and 30,000 new jobs. These are listed in Appendix A.
- 5.7 These projects were selected from a long list of over 20 schemes requiring in total more than £600 million in growth funding. Since the establishment of the Growth Fund, a number of the schemes on the original long list still have not assembled full

funding packages, demonstrating the difficulty of funding growth-related projects in key locations and the importance of the Growth Fund in supporting the projects it currently funds. If the Growth Fund did not exist it is highly likely that many of the schemes within the Fund would not currently be progressing and any money for the schemes that was available from third party sources would have been lost.

5.8 Prioritisation of the allocation of the fund was carried out on the basis of a number of factors, including:

- a) The total number of homes and jobs likely to be 'unlocked' by the provision of growth funding
- b) The contribution of third party funding from developers, boroughs and other sources and its relationship to the level of growth funding required to complete the funding package for the project
- c) The certainty of a project's delivery if funding were to be allocated
- d) The profile of required funding across the life of the ten-year Growth Fund period

5.9 Consideration was also given to the dispersal of projects across the city, and the alignment of project goals with other strategic priorities such as the recommendations of the Roads Task Force and the development of major Opportunity Areas.

5.10 The performance of the projects in the Growth Fund is now monitored as part of the Growth Areas Programme and reported to the TfL Leadership Team on a quarterly basis.

6 Business Cases

6.1 A query has been raised before the hearing about how the Growth Fund projects' business cases compare. It is important to note that the development of business cases in TfL is carried out in accordance with the TfL Business Case Development Manual and this approach is closely aligned with the Government's WebTAG guidance. This recognises that value for money and financial affordability should be weighed against regeneration (physical, economic and social) and growth as well as the transport case for investment.

6.2 However, the WebTAG definition for the regeneration impact of a project is quite narrow and limited to the direct employment impacts of a transport proposal, and it is not admissible to add the net economic value of any jobs created to the transport benefits to form a single economic benefit (as this is a distributive, not an additional benefit, and also as there are likely to be additional costs associated with the creation of new jobs beyond that of the transport project itself which are not captured in the development of the business case).

6.3 In line with WebTAG guidance, change in land values is considered to be acceptable as an illustration of impact on certain groups and to make a case for funding from the

beneficiaries of transport investment, but it is not considered a social or economic benefit and cannot be included in a calculation of benefit to cost ratio.

- 6.4 In practice this means that TfL business cases often consider regeneration and growth impacts in a qualitative manner rather than directly factoring them into an calculation of benefit to cost ratios. In many cases these will form part of a wider qualitative assessment of a project's strategic fit against the Mayor's Transport Strategy, which has a broad set of goals including supporting regeneration and tackling deprivation.
- 6.5 Often the transport case itself will be sufficient to justify TfL's investment in a proposal. For those proposals where regeneration and growth is a significant driving factor for the project, however, TfL has established its Growth Areas Programme to focus on and support the creation of homes and jobs across the capital.

In summary

- TfL needs to invest to meet the demands of a rapidly growing London – but this also presents a significant opportunity to support the city's further regeneration and growth.
- Where possible, funding for TfL projects is sought from third party sources especially from the private sector. In the case of growth-related projects a number of additional funding sources are available.
- In practice these sources are often insufficient to provide full funding for highly desirable projects with major impacts on regeneration and growth. TfL established its Growth Fund to respond to this and to help such schemes assemble complete funding packages.
- The TfL Growth Fund's £360 million is currently supporting 14 projects across London, which are expected to create over 50,000 homes and 30,000 jobs in total.
- TfL's Growth Areas Programme manages the Growth Fund but has a much broader remit and is enabling collaborative working across the GLA family to ensure the opportunities for transport to support growth are maximised throughout London.

Appendix A – Growth Fund projects

A number of schemes are still at an early stage and precise benefit to cost ratios have not been calculated yet

	Growth Fund contribution (rounded)	Scheme total cost (rounded)	Homes	Jobs	Benefit to Cost ratio
Barking Riverside Extension	£30m	£263m	7,000	2,200	2.0 : 1 ^a
Tottenham Hale station	£32m	£32m	5,000	4,000	2.0 : 1
West Ham station	£13m	£10-15m	2,500	500	TBC
Woolwich Crossrail station	£24m	£79m	3,500		2.8 : 1
Elephant & Castle Northern line ticket hall	£70m	£130m			TBC ^b
Elephant & Castle Northern Roundabout	£15m	£25m	4,000	5,000	0 : 1
Bromley-by-Bow	£12m	£67m	2,800	3,000	TBC
Fiveways	£43m	£66m	10,000	7,500	TBC
Wandsworth Ram Brewery gyratory	£33m	£67m	670	300	3.6 : 1
Vauxhall Cross	£38m	£50m	3,500	8,000	4.1 : 1
White Hart Lane station	£11m	£15m	2,000		2.0 : 1
STAR	£10m	£121m	9,000		1.9 : 1
Beam Park station	£9m	£18m	2,500		2.7 : 1
Croxley Rail Link	£16m	£284m	Growth benefits primarily outside Greater London		

^a BCR falls to 1.1 : 1 if third party funding excluded

^b A business case for an earlier proposal had a BCR of 2.3 : 1

Responses to questions:

1. Do the Mayor and TfL use investment in transport effectively to support regeneration?

Short answer: Not as well as could be

Long Answer:

In relation to long term connectivity of transport investment in the areas of greatest need eg East London/South East London then no. There needs to be more done.

If in relation to funding local activity in the short term then funds such as OLF, MRF and High Streets funding have made positive change in the area used for regeneration but funds and pot sizes are drying up. Concerns are where is the funding going to come from in the future or where will it be spent if not extending this sort of activity?

2. Which places in London have a high need for transport improvements in order to deliver regeneration?

Short Answer: Anything around East London or South of the River.

Long Answer:

Target high poverty areas where there is an East London wide issue. Waltham

Forrest/Newham/Barking & Dagenham in top 4 poverty chart with Havering/Greenwich severely detreating. http://www.londonspovertyprofile.org.uk/LPP_2013_Findings_Web.pdf.

Outer East London's general connectivity (particularly Waltham Forest/Havering/Bexley/Bromley) is very poor. There are no local train networks at all in those areas and literally only a couple of buses that cross the river either side (in addition to virtually no night buses). This means if you have no car in those areas, highly likely for a low income family then you have no chance of reaching jobs or opportunities without a severe commute. Arguably a major barrier to employment and regeneration.

Most transport in East London is geared toward central London connectivity (Barking/Newham is better connected than the rest) but there is no interconnectivity between East London north of the River and the SE regions. It takes 1.5/2 hours to simply go from one side of the river in SE London to East London (that's just to cross the river to get to the other side) via public transport on average which is how long it takes to cross the entire London network from East to West via public transport.

- Extend Piccadilly Line Overground in Waltham Forrest region.
 - (Dagenham/Greenwich/Havering/Bexley) East to South East connectivity would be improved by allowing the extension of DLR/Overground routes or perhaps even new buses in the interim in those boroughs would help. New bridges would also help both sides of the river in east London be better interconnected.
3. How could the Mayor and TfL ensure that lower income groups living locally are not adversely affected by rising land values as a result of transport improvements?

For people who would have otherwise be priced out of buying in the area offer a grant/interest neutral loan towards right to buy (if being displaced by new build or if neighbouring such developments as first priority to purchase at discount) in some shape or form so that they are not priced out of the local market?

Congestion charge zone provides discounts for residents on its borders perhaps offer similar discount scheme to residents of low income families for transport (season tickets).

4. Does TfL's £360 million Growth Fund to support jobs and growth represent value for money for the taxpayer?

Not sure what the bench mark for performance would be so cannot comment directly.

In terms of other Mayoral regeneration funding such as OLF, MRF and HSF a lot of good practice and learning has been shared across London between local authorities on how to stimulate jobs and local economies where co-working spaces and incubators have become one of the favoured methods over a selection of projects being adopted across boroughs. This method if not supported by those Funds may have never come to the forefront due to start-up costs.

5. Should the Growth Fund change in the next Mayoral term? Should it be withdrawn or expanded?

Expand the growth fund as it does help but rethink where and how money is spent.

6. What mechanisms would best enable the Mayor and TfL to claw back public investment in transport from developers who benefit from rising land values?

Short answer: Charge developers around public investment areas a levy similar to Sec106 to top up a Community/Growth Fund to aid home ownership and provide other activity.

Long Answer:

Create a **Developer levy charging zone** around any new public investment. The levy would be charged on any new developments which occur during or post planning permission of publicly funded infrastructure acting like Section 106 but the funds should be pooled into the Growth Fund to be re-distributed by the Mayor. Local authorities always fail to recover and utilise the Sec106 funds themselves. This mechanism would create a direct benefit to those effected by the land value increase and be paid for by the highest benefactors the developers.

7. What other measures the Mayor and TfL could take to improve how they invest in transport to support regeneration?

Short Answer: Do all of the above

Long Answer:

- Short term across London: If you combine the **Developer Levy Charge** to a new **Right to/Help to buy fund** ring-fenced for local residents you could create win win situation. It would be a virtuous cycle where local residents directly benefit from the opportunity to buy a home or at least do not get priced out due to rising values directly from public investment while the remaining fund get pooled into a Growth Fund. Could also create a transport discount scheme supported by levy.
- Mid/long term: Extend train routes, increasing stations across East/SE London and build new bridges/tunnels in SE London.

Just keep doing more of this engagement, activity and funding.



Camden Town Unlimited BID please contact

info@camdentownunlimited.com or 0207 380 8260 to discuss for more information.

**A mechanism for capturing wealth created from rising land and asset values
generated from public transport investments:**

Introduction:

Public sector funded infrastructure has a great regenerating effect on the area of which it is invested in but most of the rise in asset and land value is capitalised by private sector developers often pricing out the original locals from the area. This sparks passive gentrification aided by the state.

In light of Crossrail 1+2, High Speed 2 and future infrastructure investments we must create a mechanism to capture the value created by the public sector for reinvestment into the very communities that the value is created for.

London case study:

The highest poverty areas include Waltham Forrest, Newham and Barking & Dagenham, which are all in the top four poverty chart with Havering/Greenwich severely deteriorating; [click here for report](#). This is directly in correlation with areas which lack of connectivity to the rest of London and therefore the employment opportunities London offers.

Developers take no interest in areas of no or low transport infrastructure. It is clear from the map below that the areas of highest poverty in London have a direct correlation with levels of transport connectivity.

The map below shows the current underground system and most deprived boroughs.



Outer East London's general connectivity (particularly Waltham Forest/Havering/Bexley/Bromley) is very poor. There are no local train networks at all in those areas and literally only a couple of buses that cross the river either side (in addition to virtually no night buses). This means if you have no car in those areas, highly likely for a low income family then you have no chance of reaching jobs or opportunities without a severe commute. Arguably a major barrier to employment and regeneration.

Most transport in East London is geared toward central London connectivity (Barking/Newham is better connected than the rest) but there is no interconnectivity between East London north of the River and the SE regions. It takes 1.5/2 hours to simply go from one side of the river in SE London to East London (that's just to cross the river to get to the other side) via public transport on average which is how long it takes to cross the entire London network from East to West via public transport.

The solution:

Create a **Developer levy charging zone** around any new public investment. The levy would be charged on any new developments which occur during or post planning permission of publicly funded infrastructure acting in much the same way as Section 106 but the funds should be pooled into a single pot to be re-distributed in initiatives which support the respective communities similar to Mayoral initiatives such as Outer London Fund. This mechanism would create a direct benefit to those affected by the land value increase and be paid for by the highest benefactors, the developers.

How to utilise the new levy raised:

1. Community Funds:

Local authorities time and time again fail to recover and utilise their Sec106 funds. An alternative is to pool all the London wide funds into one pot to create an open and competitive application process.

2. Transport relief:

The central London Congestion charge zone provides discounts for local residents on its borders. Perhaps offering a similar discount scheme to residents of low income families for public transport (season tickets) could be paid for using the levy through means testing for eligible households in developer zones.

3. Home ownership aid:

For residents who would have been otherwise priced out of buying in the area due to sudden rising asset values provide them a grant/interest neutral loan towards right to buy (if being displaced by new build or if neighbouring such developments as first priority to purchase at discount) in some shape or form so that they are not priced out of the local market due to new transport links.

This scheme could be funded through a portion of the levy and be available to residents or former residents who have been displaced wishing to become home owners.

Conclusion:

If you use the **Developer Levy Charge** towards **Community Funds**, a **Public Transport Relief Scheme** (immediate benefit) and **Right to/Help to buy fund** (long term benefit) ring-fenced for local residents you could create win-win situation. It would be a virtuous cycle where local residents directly benefit from transport infrastructure investment and gain aid in the opportunity to buy a home or at least not be priced out due to rising values (directly from public investment).

This would be a major step towards capturing the value generated from economic growth and increase social returns on public sector investment.



This proposal has been produced by Camden Town Unlimited BID
please contact info@camdentownunlimited.com or 0207 380 8260
to discuss for more information.

Royal Town Planning Institute
41 Botolph Lane
London EC3R 8DL
Tel +44 (0)20 7929 9494
Fax +44 (0)20 7929 9490
Email online@rtpi.org.uk
Website: www.rtpi.org.uk

Patron HRH The Prince of Wales KG KT PC GCB

14 August 2015

Dear Gareth Bacon,

Response to Regeneration Committee call for evidence: Investigation into Transport-led regeneration

Thank you for the opportunity to respond to the above call for evidence. The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 23,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Yours Faithfully,

James Harris MA MSC

Policy and Networks Manager
Royal Town Planning Institute
41 Botolph Lane, London, EC3R 8DL
Tel: 020 7929 9483

Do the Mayor and TfL use investment in transport effectively to support regeneration?

We welcome the coordination of transport and regeneration planning in London. There are huge and varied benefits to be gained from effective, integrated, and strategic planning of transport infrastructure, however these benefits are often excluded from the formal appraisal methodologies applied by the Department for Transport for national projects. The approach taken in London, for example through the 2050 London Infrastructure Plan, therefore represents a valuable step forward in the strategic planning of transport investment, which recognises the wider benefits that can be derived from regeneration and other development priorities. However more might be done to ensure that London's strategic plans are produced in cooperation with the surrounding counties which they impact upon.

Does TfL's £360 million Growth Fund to support jobs and growth represent value for money for the taxpayer?

Lack of infrastructure is one of the main barriers to growth identified in our work on housing growth and delivery. People partly oppose growth because they know it will place burdens on public services, and planning permissions sometimes can be refused or not built out when granted because the private sector has been required to take on positions of risk related to the funding of infrastructure which it deems too costly.

What mechanisms would best enable the Mayor and TfL to claw back public investment in transport from developers who benefit from rising land values?

A similar model to the Business Rate Supplement established for Crossrail 1 could conceivably enable the Mayor to capture a greater proportion of the uplift from major projects in the future, although we would like to see a discussion around extending this to capture land value uplift from all property owners as oppose to just businesses – as part of a broader consideration around finance and property tax reform in London.

In countries like Germany, French and Holland there are better ways to capture land value uplift. A shift towards these alternative models of growth-based planning and development also help to distribute the benefits of transport investment more widely.

How could the Mayor and TfL ensure that lower income groups living locally are not adversely affected by rising land values as a result of transport improvements?

Regarding the above point, if land value uplift from transport investment was returned to London, then the Mayor would be better able to make choices which support lower income groups.

What other measures the Mayor and TfL could take to improve how they invest in transport to support regeneration?

- A stronger degree of cross-boundary cooperation between London and its surrounding local authorities when planning for transport infrastructure and regeneration
- An expansion of transport appraisal methodologies to include wider social and environmental benefits and costs, such as public health, pollution, biodiversity, heritage and security, recognising that while many of these are not easily quantifiable, they are better included in a simplified form that neglected.
- Support for the proper resourcing of local authority planning departments and plan-making at all spatial scales
- Additional investment in smaller 'soft' infrastructure projects, such as those that encourage sustainable modal shift or improve connectivity for walking and cycling at the neighbourhood level

For more information on these topics, please see our 2014 paper: [Transport Infrastructure Investment: Capturing the Wider Benefits of Investment in Transport Infrastructure](#)

Planning and Borough Development

Kensington Town Hall, Hornton Street, London, W8 7NX

Executive Director for Planning and Borough Development

Graham Stallwood



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

London Assembly Regeneration Committee
Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

14 August 2015

BY EMAIL to: regenerationcommittee@london.gov.uk

Please ask for: James Masini

Dear Sir/Madam

Re: Mayor's Regeneration Committee call for submissions

I am pleased to enclose the response of the Royal Borough of Kensington and Chelsea to the Mayor's Regeneration Committee call for submissions.

This response focuses on two questions raised:

Which places in London have a high need for transport improvements in order to deliver regeneration?

Do the Mayor and TfL use investment in transport effectively to support regeneration?

For the most part the GLA and TfL do a good job of realising London's potential in bringing forward sites for development, but the Council is frustrated that firm support for a Crossrail station at Kensal Canalside from the Mayor, TfL, and Crossrail remains lacking. Without this we will not be able to optimise residential development on this Opportunity Area site and we will fall considerably short of our London Plan housing target for the borough.

This site has the potential to create up to 4,000 more homes and nearly 3,000 more jobs. It is a development that could yield more than £2.2 billion in Gross Development Value and £2 billion in Gross Value Added. The station would also be a catalyst for the wider regeneration of North Kensington where millions of pounds of regeneration potential would be unlocked.

Like most of the remaining brownfield sites left undeveloped in Central London, it has constraints - in this case transport accessibility.

In order to unlock this, improvements to public transport are essential. The site is currently dependent on a dead-end service road that joins it to Ladbroke Grove, at a junction that is already approaching congested. It is why the Borough would like a Crossrail station to serve the site. This comes at a cost, but it is one that would be borne by the landowners in the form of

Direct Line: 020 7361 3234

Fax:

Email:

Web:

www.rbkc.gov.uk

planning obligations. The Council has already resolved to underwrite the station costs in advance of those receipts.

It is potentially a very good news story for London, but the Council is yet to secure confirmation - due in no small part to the disparate nature of the transport establishment with which we have been trying to engage.

We have been working with Isabel Dedring and TfL to seek a solution to these issues, pointing out that the additional track needed to deliver the station would be very useful in addressing significant congestion problems facing Crossrail when the HS2 station at Old Oak comes online. Earlier this month we gave evidence to the HS2 Bill Committee, and made this point.

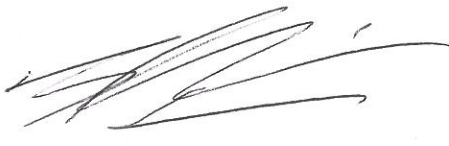
Without a Crossrail station, the capacity of this site with the existing transport languishes at just 700 units. This is less than ten per cent of our 10 year housing targets. In light of London's current housing shortage, we must be able to do better than that. Furthermore, the Gross Value Added for this unpalatable alternative is less than a quarter of what could be achieved with a station.

The railway industry has been keen to talk to us but, perhaps understandably, their remit is strictly limited. We are asking the regeneration community to come together, galvanise the transport community and help to deliver this significant brownfield site.

The Council has already agreed to underwrite the cost of the station (to be recouped from developer contributions) and work with Network Rail, TfL and Crossrail to discover how additional tracks will be funded. This is a railway scheme that should come forward not only to unlock new development on site, but also across North Kensington. It has the potential to be an excellent case study as a prime example of private business funding public infrastructure and unlocking development at the Borough's last remaining major development site.

Should the committee wish to discuss any of this further, please do not hesitate to contact me.

Yours faithfully

Pp 

Graham Stallwood
Executive Director
Planning and Borough Development



10 Wandsworth Road
London, SW8 2LL

Responding Officer - John Rider
Head of Delivery – Transport Strategy

Email – [REDACTED]
Tel – 020 7926 0411

Re: Regeneration Committee call for evidence: Investigation into transport-led regeneration– Officer Response to Consultation Exercise (August 2015) by the London Borough of Lambeth

Dear Sirs,

The London Borough of Lambeth welcomes the opportunity to respond to the Regeneration Committee's call for evidence into Transport Led Regeneration and in particular, use of the Growth Fund to pump prime development.

1 Introduction

- 1.1 The London Plan identifies Opportunity Areas throughout London where the highest levels of growth will take place. Lambeth has two of these, Nine Elms Vauxhall (NEV) and Waterloo, both of which are in the Central Activities Zone. NEV will create more than 18,000 new homes and 25,000 new jobs with a further 2,000 homes and 18,000 jobs in the Waterloo area.
- 1.2 We are also committed to seeing further growth in the number of jobs elsewhere in the borough. Our plans for Brixton are forecasted to create an additional 1,000 new jobs alone. The development of the Brixton Central Masterplan with local residents and businesses will provide the practical ways in which these jobs will be created.
- 1.3 Investment in transport is fundamental to the delivery of these jobs and homes in all these areas. The Nine Elms Vauxhall Opportunity Area Planning Framework recognises a lack of transport accessibility as a barrier to growth in the area. Importantly in the context of the Growth Fund and transport role in bringing forward development, the phasing and timing of delivery of transport interventions was identified as a concern and there was a need to ensure early delivery wherever possible.

- 1.4 Transport is similarly crucial to development of the Waterloo area where the OAPF identifies a number of key transport and public realm aspirations. Again, specifically in relation to the role of the Growth Fund, a key principle identified in the Waterloo OAPF was that infrastructure should be added to keep pace with development. Implicitly this suggests that the necessary infrastructure (including transport) needs to be in place **before** the housing and jobs as an enabling activity.
- 1.5 A key barrier to development has always been the phasing of new infrastructure. Developers and businesses would argue that the infrastructure needs to be in place before jobs and homes can be built, however current funding arrangements operate such financing of the infrastructure is through S106/CIL which is usually paid once development has started.

2 Questions

- 2.1 Do the Mayor and TfL use investment in transport effectively to support regeneration?
- *Yes. The growth fund in particular is an important mechanism for pump priming transport infrastructure to enable new development. Improvements on the A23 through Streatham and in South Norwood were both funded through the GLA's Outer London fund*
 - *The Northern Line Extension is an excellent example of pump priming strategic transport investment on the back of uplift in land value*
- 2.2 Which places in London have a high need for transport improvements in order to deliver regeneration?
- *Good models exist for delivery in OAPF areas, however going forwards new models are need to support regeneration in other areas, especially outside the CAZ where forecast S106 revenues are much lower and sites are harder to identify.*
 - *An overground rail connection in Brixton would have significant benefits in terms of regeneration and links to similar areas of regeneration in East London with shared or similar characteristics in terms of cultural and media growth i.e. Shoreditch and Dalston Junction. A new East Brixton overground station should be considered to enable this benefit to occur. This would also over considerable benefit in terms of relief to the existing bus and LUL services which are severely overcrowded.*
 - *The functioning of Vauxhall in terms of public realm improvements, including pedestrian access and safety, would greatly benefit from the implementation of a transformational approach to the gyratory currently under development.*
- 2.3 How could the Mayor and TfL ensure that lower income groups living locally are not adversely affected by rising land values as a result of transport improvements?
- *Strong commitment to a properly defined affordable rent policy.*

- *Greater levels of support for Boroughs to implement apprenticeships and training to ensure that a significant proportion of new jobs can be filled locally.*
- *Capping of annual fare rises.*

2.4 Does TfL's £360 million Growth Fund to support jobs and growth represent value for money for the taxpayer?

- *Yes. It is a crucial mechanism for pump priming transport investment to get early delivery and enable growth.*

2.5 Should the Growth Fund change in the next Mayoral term? Should it be withdrawn or expanded?

- *Lambeth would support expansion of the Growth Fund. There is an increasing need to unlock development across the Council which generally requires pump priming of key infrastructure (often transport) to facilitate development. The Growth Fund is a good mechanism for enabling this, but it needs to operate at a strategic level.*
- *Lambeth have recently completed a major infrastructure study exploring the need for strategic infrastructure across the Borough over the next 15 years to support growth and regeneration. This covers not just Transport but also includes Health, Education, Open Spaces & Parks and Utilities. The study has identified there is a substantial funding gap between the projected income from CIL and S106 and the forecast infrastructure costs in the region of £160m. The Growth Fund is a way of helping close this gap, as well as delivery high density development.*

2.6 What mechanisms would best enable the Mayor and TfL to claw back public investment in transport from developers who benefit from rising land values?

- *Clawback against Business Rates generated (as per the Northern Line Extension). This is only practical for very large schemes with a high degree of certainty over future patronage levels.*
- *Stronger support for Boroughs in negotiations around CIL levies based on forecast land values.*
- *More explicit incorporation of wider transport benefits (including the uplift in land value) into the Business Case for projects/schemes. This can then be more easily incorporated into the negotiations around CIL levels and Business Rates.*

2.7 What other measures the Mayor and TfL could take to improve how they invest in transport to support regeneration?

- *Continue developing evidence base around wider economic impacts of transport investment to build this into the business case.*

- *More partnership working with Boroughs around TfL commercial opportunities (rather than current system which seems very confrontational). TfL commercial to be more integrated into wider TfL activities and programmes. There is an opportunity to work with TfL around their development sites to bring forward schemes of real community/social value.*
- *Whilst investment in capital is to be welcomed and encouraged, funding cuts to Local Authorities inevitably mean that there is little or no revenue available to maintain the new infrastructure.*

Dear Sir or Madam,

There is massive potential for the Mayor and TfL to use investment in transport effectively to support regeneration. To date, apart from my several high profile schemes, there has not been much joined up thinking between the TfL and GLA in regard to transport and regeneration.

The area in which I want to focus on is the East London area, especially as it relates to the Lower Lea Valley, Poplar and the areas on either side of the Tower Hamlets and Newham boundaries. This is potentially the largest regeneration area in terms of homes and jobs across the whole of London. A HousingZone has recently been announced, OAPF's are taking place for the Isle of Dogs and Poplar and the Royal Docks. To the north of the area is the Olympic Park, Stratford and Hackney Wick. There is already major transport infrastructure investment occurring such as Crossrail and the Silvertown Crossing. However, there are a whole host of transport and accessibility projects that are needed to secure the regeneration and thousands of homes and jobs throughout the area. A Joint Programme Board of all the key partners including TfL are presently developing a programme called Stitching Us Back Together (SUBT) which hopes to capture all of these projects, prioritize them and identify funding gaps that need to be met. TfL are beginning to take the lead in this process but this needs to be firmed up and TfL need to be resourced sufficiently to carry the programme through. The SUBT Programme will also need London wide recognition by TfL and the GLA. Unless this programme takes place, the regeneration process will stop but as important, the present massive damage being done to the local community by transport, accessibility and environmental weaknesses will continue. This area has the highest concentration of Brownfield sites, the worst environmental impact (eg. A12, A13 and Aspen Way) and the poorest and most unhealthy communities in London. What is worse is the fact that much of this community and environmental damage is caused by the transport infrastructure. The Joint Programme Board will be keen to present the SUBT Strategy and Programme to the regeneration committee as an example of how transport and regeneration needs to and can work together.

Transport improvements may increase land values but equally they should be structured to benefit the local community as compensation. Indeed, the two should go together ie. The community should benefit for the same advantages that transport improvements bring that also impact on land values. One very important strategic example is the land bridge proposal over Aspen Way. This will undoubtedly massively increase values in South Poplar but equally it will enable access for one of the poorest communities in London to the Canary Wharf Business District and Crossrail. Poplar residents will be able to have jobs at Heathrow Airport. At present, the cliff edge between the Canary Wharf business district and Poplar is the worst in London, if not in Europe. A similar principle will apply to all of the road and river crossings included in the SUBT programme ie. Higher land values, but transformed life opportunities for the local community.

The TfL Growth Fund has invested very little so far in SUBT and so it is difficult to see what value for money there is for the local taxpayer. The Growth Fund should be targeted to the major regeneration areas in London to enable regeneration to take place especially SUBT. Developing the appropriate mechanisms to claw back public

transport investment from developers will be critical. Most of the SUBT projects will greatly benefit developers such as Berkeley Homes and most significantly, Canary Wharf Ltd. The developer gains will be massive. The most important improvement is that the Mayor guides TfL to make regeneration the top priority for transport investment, that TfL has the clear lead responsibility on regeneration transport programmes and that there is a complete joining up of all the partners, not least TfL and GLA and the local authorities concerned.

Yours sincerely,

Steve Stride
Chair of the Lea Valley/Poplar Joint Programme Board

I would submit that no new Boris's buses are ordered. And that the present fleet of Boris's buses be altered to allow for windows that open in summer, and a heating system be fitted for winter use. These buses are far too hot in summer and far too cold in winter.

Plus the fact that the diesel engines run all of the time.

Lastly, that the major closure of central London roads for cycle days or cycle racing be a thing of the past.

Alan Taylor

Re Inquiry: Transport-led regeneration

Thank you for the opportunity to comment on this important issue.

We trust that, given that it was until the end of the month that responses to the inquiry were welcomed (see email chain below), you will accept our comments dated 31st August.

We wish to make the following brief comments, with reference to the Thames Gateway road bridge as a case study of ill-conceived transport-led regeneration.

We understand that Campaign for Better Transport will have made a submission referencing a report of theirs.

We wish to follow that up stating that it is our view that it is regeneration led by sustainable transport modes which is clearly the way to develop London sustainably in a way which helps address inequalities and helps us meet our environmental targets, and that road-building-led regeneration is not only counter-productive but also iniquitous.

Focusing on regeneration models which help improving accessibility through reducing the need for people to have to travel, by providing as much as possible, key amenities and work opportunities within easy walking and cycling distances not only enhances quality of life and health, but also takes the pressure off public transport.

Investing in public transport for any identified need to facilitate longer journeys helps all road users. It helps those without access to a vehicle and reliant on public transport, and also helps take the pressure off the road network – the aim should be that the road network should be left for essential vehicle journeys (both existing and potential new ones as a result of population growth).

By contrast investing in road-based regeneration tends to mean fewer people travel by sustainable modes (as people are attracted by driving), which is not only contrary to policy and also deprives people of the health benefits of active travel.

Non-road based regeneration makes much better use of space, enabling higher densities and more land available for housing and work opportunities, or public/open space – as providing space for roads and parking space is wasteful. The main businesses which tend to be attracted to an area when road-based regeneration is pursued would be vehicle-dependent development such as warehousing and distribution which tends to be low-density and low-employment usage.

Indeed, the evidence for road-based regeneration is very weak and potentially counter-productive.

The Greenwich Peninsula site should have been a prime development site, if its position next to the 4-lane Blackwall road Tunnel was truly beneficial – yet the site lay dormant for a long time until British Gas paid English Partnerships £20m (as I recall) to secure a Jubilee Line Extension station on the site.

Further the proposed Thames Gateway road bridge (TGB) proposed between Greenwich and Newham, on proper scrutiny at a Public Inquiry in 2005-6, showed that the regeneration claims made for the scheme did not stand up.

Further, given the requirement in planning for sustainable development, whereby economic development, the building of a just society and the requirement to live within our environmental limits are required to be delivered together (ie through win, win, win solutions) it is clear that

transport investment must be such that helps reduce inequalities (including health inequalities), and help deliver on environmental targets such as on climate change and air pollution – and that the pursuit of economic goals does not add to the problems of meeting either social and environmental goals.

Whereas non-road based regeneration helps deliver sustainable development, road-based regeneration adds to traffic levels (through generated traffic – whether overall or at certain times of day), and so worsens congestion in the area (though the pattern of existing congestion may change), and adds to air pollution.

More traffic and worse congestion and more air pollution blights and is clearly de-generation for local communities. Air pollution is an issue which hits the most vulnerable, and the most deprived the hardest (as they tend to live near the main roads where air pollution is worst) – and so adding to air pollution adds to health inequalities.

But worse traffic, congestion and air pollution is also bad for business and for regeneration – adding to congestion is clearly counter-productive, and air pollution makes an area unattractive for people to live or work or visit.

We wish to draw your attention to a few key links:

Case study: the Thames Gateway road bridge:

This press release and linked briefing refers to various issues raised by the planned TGB – on traffic generation and congestion, on air pollution, and on fewer people walking and cycling and using public transport if the scheme went ahead, and on regeneration.

Friends of the Earth's 2007 briefing from after the end of the TGB inquiry but before it was known the Inspector had recommended rejecting it

http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008

Background briefing at the end of the Public Inquiry:

http://www.foe.co.uk/sites/default/files/downloads/thames_gateway_bridge_07.pdf

On traffic and congestion:

- Induced traffic: Professor Phil Goodwin

<http://stopcityairportmasterplan.tumblr.com/post/19513243412/induced-traffic-again-and-again-and-again>

- Transport expert John Elliott's slides showing when Blackwall tunnel was doubled from 2 to 4 lanes, traffic more than doubled within a year at peak time

<http://stopcityairportmasterplan.tumblr.com/post/20012814230/presentation-slides-arguing-the-case-against-the>

- John Elliott also has made clear that with more roadspace, more traffic would mean overall worse congestion in the area (though the pattern of congestion may change).

If congestion was relieved eg at the Blackwall tunnel/Silvertown Link approach then it would just mean that traffic had got on to another area quicker and making congestion worse there.

- The TGB Inspector's report stated that crossing was "likely to cause increased congestion"

http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008

- A Hyder report which was buried by Greenwich warned of "The likely outcome would be the exhaustion of the Silvertown Link capacity within a relatively short timeframe with exacerbated congestion on the local road network." and "This could only be mitigated by a new high quality public transport link, such as a DLR extension."

<http://853blog.com/2014/05/06/buried-greenwich-council-report-criticises-silvertown-tunnel/>

Road building and air pollution:

- For example the TGB would have resulted in worse air pollution (see above)
- Kings college London did a study of widening the A206 (which was a key link to make a route all the way from the TGB to the M25 dual)

<http://www.sciencedirect.com/science/article/pii/S0048969714010900>

This showed:

- Local air quality deteriorated after completion of a road widening scheme in south London.
- The EU PM10 limit value (LV) was breached during construction.
- NO2 LV was breached after scheme due to increased cars, taxis and LGVs

Despite this evidence, TfL have continued to pursue new road-building and argued that it would help regeneration.

What they have not done is look at a proper package of non-road alternatives, which would include multiple non-road investments as well as road-pricing etc as required.

Jenny Bates

Friends of the Earth London Campaigner

(and Air Pollution Campaigner)

The Printworks, 1st Floor, 137-143 Clapham Road

London SW9 0HP

www.foe.co.uk

