

Sadiq Khan, Mayor of London  
New London Plan  
GLA City Hall  
London Plan Team  
Post Point 18  
FREEPOST RTJC-XBZZ-GJKZ  
London SE12AA

2 March 2018

Dear Mayor Khan,

**The New Draft London Plan**

I am writing on behalf of London TravelWatch, London's statutory transport watchdog.

Please find attached our response to the New Draft London Plan consultation.

If you have any questions please contact Vincent Stops by email,  
[Vincent.stops@londontravelwatch.org.uk](mailto:Vincent.stops@londontravelwatch.org.uk)

Yours sincerely

Arthur Leathley  
Chair, London TravelWatch

## **Submission by London TravelWatch to the New London Plan consultation**

### **Chapter 1, Good growth policies**

London TravelWatch supports the Mayor's good growth approach to the London Plan. Streets that are clean, walkable and vibrant are also streets that support public transport services.

### **Chapter 2, Spatial development patterns**

London TravelWatch supports more intense development of those areas already well connected, such as transport hubs and town centres. The recognition that more convivial, healthy and accessible streets must accompany development is supported.

The opportunity areas (OA's), where major development is directed are supported, but there should be more certainty about the timescales of supporting transport infrastructure. Where phasing of development is suggested, or interim public transport solutions promoted, there should be more detail. Bus services also need planning well ahead of implementation if they are to operate as efficiently as possible.

### **Chapter 9 Sustainable infrastructure**

#### **Policy SI 15 C, Water transport**

This policy supports development proposals to facilitate an increase in the amount of freight. London TravelWatch supports this proposal insofar as freight journeys undertaken by river will reduce the demand on London's streets.

### **Chapter 10, Transport**

**Policy T1 A, Strategic approach to transport.** The policy promotes a target of 80% of all trips to be made by foot, cycle and public transport. The policy supports a series of schemes as diverse as planting street trees to roads pricing and Crossrail 2. This is generally supported, as are the associated transport schemes in Table 10.1.

We have previously called for:

'A road network that makes best use of scarce capacity', because without action, congestion will worsen as traffic grows and capacity is reduced to facilitate town centre, cycle and road safety schemes. To make best use of the available space London TravelWatch wants to see:

A planned and co-ordinated approach to reducing road traffic, which considers all measures including roads pricing'

London TravelWatch therefore supports a review of the existing congestion charging scheme and consideration of a 'next generation' charging scheme. In relation to the timescale suggested in Table 1, i.e. 2022-2041, consideration of charging needs to commence sooner rather than later if London is to address traffic congestion on its streets and particularly enable bus services to operate much more efficiently. Similarly, there needs to be certainty as to when major public transport schemes, such as Crossrail 2, will commence and be operational.

There is support for wheelchair accessible bus stops in Table 10.1. However, the entry needs clarifying to note that 'Hail and Ride' bus services are not accessible and should be phased out. A policy to utilise development gain (£106 million) associated with nearby development sites to inaccessible bus stops would be welcome.

### **Policy T1 B, Strategic approach to transport**

This general policy is supportive of making the most effective use of well-connected land. This is supported.

### **Policy T2, Healthy streets**

This policy promotes the Mayor's 'Healthy Streets' approach to the development of London's streets. This is supported.

### **Policy T3, Transport capacity, connectivity and safeguarding**

This policy promotes effective transport policies for London and the 'Wider South East' and seeks to protect land for transport functions, including the safeguarding of new sites and alignments associated with the indicative list (Table 10.1). This policy is supported.

London TravelWatch has previously promoted the protection and use of various parcels of land and corridors for transport uses. These are summarised in our report, *What next for London's transport infrastructure*. This can be found at: [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=4254&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=4254&field=file)

The Croxley Link project to divert the Metropolitan Line from Watford station to Watford Junction is supported by London TravelWatch. It improves local journey opportunities and provides links to and from London. Whilst it is outside the Greater London boundary, Watford is within the wider London Travel Area and the 'Wider South East'. Although there are some funding issues at present, this strategic plan should refer to its safeguarding in the medium and longer term. We believe it should be supported in the text of the London Plan.

The Victoria Coach station is a unique transport facility. It is by far the largest such facility in central London. It should also be specifically safeguarded within this policy because it is at risk of being lost to the transport network without a satisfactory replacement.

## **Policy T4, Assessing and mitigating transport impacts**

This policy supports transport assessments, as part of development control, and the provision of appropriate transport infrastructure, facilities and mitigation. This is supported.

## **Policy T5, Cycling**

The policy is supportive of more and safer cycling, the development of cycle routes and improved infrastructure. It also specifies minimum cycle parking levels for different uses. This is supported.

London TravelWatch has recently published its own report, *Cycling in London*, that contains several recommendations for more and safer cycling. This is available at: [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=4469&age=&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=4469&age=&field=file)

**Policy T6 and T6 1 to 4, Car parking.** London TravelWatch recognises that parking management is a necessary tool to manage available road space, and in those locations that are well served by public transport can be used to manage demand for private vehicle travel. We support these policies.

Car-free and 'car-lite' policies will allow development at densities that would not otherwise be possible in locations that are well connected to public transport. These policies are supported. They could also reduce the impact of traffic on the local road network. However, restricting car parking within the curtilage of a large-scale development may lead to parking pressure on the public highway if there are insufficient on-street parking controls in place. The text of this policy should refer to the need for on-street controls and controlled parking zones associated with car-free development.

**Policy T6.1, sub-policy G.** This policy seems to secure a good proportion of parking for disabled residents. But these issues are contentious, particularly once residents have moved in to a development. There should be a specific requirement, written into associated S106 agreements, to ensure that those who move into car-free developments are made aware that parking bays may subsequently be converted for the use of disabled people.

## **Policy T6.5, Non-residential disabled persons parking**

We support the provision of disabled car parking spaces. However, this policy does not provide for this in car-free developments because it relies on providing a percentage of total car parking for disabled users. 5% of nothing is nothing! This policy needs reconsideration.

## **Policy T7, Freight and servicing**

London TravelWatch has no remit for freight transport unless it affects the use of London's passenger transport networks and streets.

Freight consolidation outside of congested areas is desirable, but difficult to achieve. **Sub-policy T7 D** is supportive of freight consolidation sites and is supported.

Retiming of deliveries away from the peak hours would benefit those we represent. New development should facilitate out of hours delivery where possible.

London's streets are often narrow and difficult to negotiate. Some sizes of lorries are not appropriate, however beneficial large payloads are to business. This has implications for many aspects of how the public perceives London's streets. Development control should restrict inappropriately large vehicles where it can be justified and the Mayor should seek to reduce the use of London's streets by inappropriately large lorries, perhaps using management plans for sites or considerate constructor agreements.

## **Policy T8 sub-policy E, Aviation**

This sub-policy requires expansion plans to demonstrate credible surface transport plans and is supported. Any plans must take account of the needs of existing and future, non-airport related passengers.

## **Policy T9, Funding transport infrastructure through planning**

This policy promotes the use of the Mayor's powers to levy a community infrastructure levy and require the funding of mitigation measures associated with the travel demand of new development. This is supported.

## **Chapter 11, Funding the London Plan**

This chapter sets out the funding challenge to deliver the objectives of the Plan and the sources of capital and revenue to deliver transport services. The summary of sources of income does not explore roads pricing, but it should. Roads pricing would manage demand for road space, improve the performance of bus services, enable more and safer cycling and walking as well as generate an income scheme to fund alternative transport services.

## **Additional policies**

### **Transport and London's Rivers and waterways**

There is a policy supporting the use of the River Thames in the Sustainable infrastructure chapter along with text supporting passenger transport and the Port of London and TfL's Piers Strategy. There is an entry in Table 10.1 referencing river services.

However, there seems to be an omission of a policy on the use of London's rivers for public transport services and as cycling corridors where this is appropriate.

### **London's bus services**

The plan supports London's bus services at 10.3.6, but there are no particular policies to protect and develop bus services. The following is suggested:

Development plans and development control should seek to support bus services through planning agreements where appropriate. For example, bus services should be supported in the early stages of occupation of a development, when their operation cannot be fully justified due to low passenger numbers.

### **Walking**

It is noted that the Walk London Network is safeguarded. This is welcome; however, there is no policy support for the development of additional long distance walking routes.

There are still many locations where pavements do not exist, there are no dropped kerbs or crossovers, pavements are too narrow, pedestrian crossings unavailable or not at the locations pedestrians would want them. Sometimes there are physical barriers to comfortable and direct walking. There should, therefore be policies to ensure these deficiencies are rectified when development takes place.

The roll out of Legible London should be supported by a policy. It should specifically promote the map-based wayfinding signs, rather than the finger posts that have been allowed to proliferate over the last few years, contrary to the original concept of the scheme.

All streets should have street nameplates in an appropriate location.