

From: Peter Eversden
Sent: 07 May 2019 22:28
To: Jennifer Peters
Cc:
Subject: NLP EiP M76 to M80 - requested FSCs
Attachments: Central London bus cuts and congestion _ TravelWatch.pdf

Follow Up Flag: Follow up
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Dear Jennifer,

In written statements and during the hearing today on M76 to M80 several organisations supported London Forum's proposal that an equivalent should be in the NLP of Policy 6.1 A a) in the current 2016 London Plan for "encouraging patterns and nodes of development that reduce the need to travel, especially by car." It is the first strategic policy in the current plan for 'Integrating transport and development' and is used to consider development proposals.

The only use of the words "reduce the need to travel" in the draft NLP is in paragraph 5.1.8A for co-location of social infrastructure facilities. It should be a key objective in all new developments for supporting the Mayor's Transport Strategy and Policy T1 for the 'strategic approach to transport'.

That would accord with paragraphs 29, 30 and 34 of the 2012 NPPF.

London Forum proposes that Policy T1 B should have an insert as in bold :-

All development should make the most effective use of land **and reduce the need to travel, especially by car**, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Also that Policy T2 A should have an insert as in bold :-

Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling **and reduce the need to travel by car**.

London Forum said today that the TfL Budget lacked defined bus priority measures, following the fall in bus usage. We hope that TfL will consider the six proposals of London TravelWatch in their statement of 12 April 2019, as attached, which London Forum supports.

At the discussions on M78, London Forum pointed out that paragraph 30 of the 2012 NPPF requires that "supporting sustainable transport and development patterns are aligned."

If the Mayor's MTS deliveries will not be achieved early enough, the implications could be that Policy D6 B 3) and 3A) should cause developments to be phased or for the applicant to fund the infrastructure required, if social infrastructure including public transport are inadequate.

Paragraph 2.1.11 of the draft NLP supports that - "Where development proposals are emerging and transport investment is not yet fully secured, delivery of the long- term capacity for homes and jobs will need to be phased".

As a result, London Forum proposed today that there should be an additional paragraph 10.4.4A :-

New development may need to be phased if infrastructure, including public transport, will be overloaded or fail to meet the needs introduced by the development. See paragraph 2.1.11 and Policy D6 B 3) and D6 B 3A).

Regards, Peter Eversden

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Central London bus cuts could compound congestion warns watchdog

12 April 2019

The central London bus service cuts announced today by Transport for London will mean tens of thousands of bus passengers will have to make an additional change to complete their journey or change the way they travel every day.

Arthur Leathley, Chair of London TravelWatch expressed concern on behalf of passengers: 'These changes will mean slower and less reliable bus journeys for tens of thousands of bus passengers every day. Passengers will have to make an additional change of bus to complete their journey or have to change the way they travel, probably using a more expensive alternative or even compounding the problems of congestion by using their car or a private hire vehicle. Older and disabled passengers will have particular difficulties where they will have to make an additional change from one bus to another.'

When TfL consulted on their proposals last year London TravelWatch asked for action to halt deteriorating bus performance and rising costs by prioritising the bus, not cutting and curtailing services. The watchdog will continue to press TfL and local councils to prioritise bus travel by:

- Extending congestion charging so that it operates for longer hours, seven days a week
- Extending the operational hours of bus lanes – many could operate 24/7. This would also be of great benefit to cycles
- Extending the operational hours of the red routes
- Reviewing parking on roads used by buses
- Increasing the number of bus only streets like the proposed Tottenham Court Road scheme, and
- Investigating a wider and more sophisticated roads pricing scheme.

Further information

From: Peter Eversden
Sent: 07 May 2019 22:49
To: Jennifer Peters; Josephine Voss
Cc: Andrew Bosi; EIP Secretary; Michael Bach
Subject: NLP EiP M76 to M80 - Freight demand management

Follow Up Flag: Follow up
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Dear Jennifer and Josephine,

At today's hearings on public transport policies, London Forum pointed out what we think is an error in Table 4.2 of the Summary traffic reduction measures in the MTS scenario on page 14 of the 2017 Strategic Transport Modelling Report (NLP/TR/002).

It has an assumption that for 'Freight demand management' van traffic will grow only in line with population.

However, in the light of increased on-line shopping per head of the existing population and associated deliveries, that is unlikely. There could be an increase in deliveries and the movement of small business vehicles to off-set some of the fall in the use of private cars. Policy T7 E applies.

Regards, Peter Eversden

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