Written Statement for the London Plan Examination in Public – Matter 79

Transport for London (1170) March 2019

M79. How would delivery of the development proposed in the Plan (particularly the housing and employment development in Opportunity Areas and housing targets in outer Boroughs) and the associated car parking standards affect the safety, reliability and/or operation of the motorways (M1, M4, M11 and M25) and strategic trunk roads in and around London?

1. INTRODUCTION

1.1. The draft Plan seeks to minimise negative impacts on the road network in London and by extension, those that surround it. While the delivery of any significant levels of development would have some impact on the motorways and strategic trunk roads in and around London, the Plan's approach to focusing growth in well connected locations, in line with NPPF, allied with the focus on mode shift seeks to ensure these impacts to be minimised. This will be further supported by the Plan's transport policies, particularly the car parking standards, and the interventions set out in the Mayor's Transport Strategy (MTS).

2. IMPACT OF NEW DEVELOPMENT

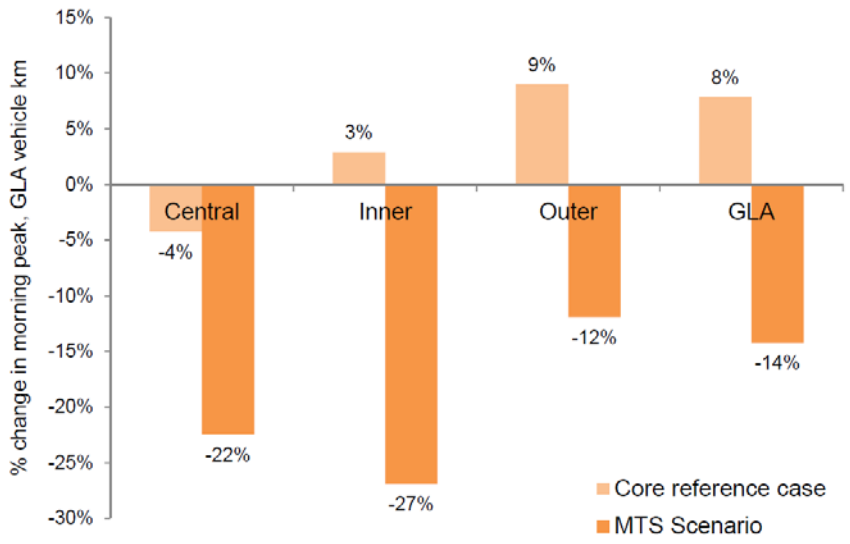
2.1 We have tested the proposed levels of growth in the draft Plan using our suite of strategic transport models, which we explain in more detail in our statement on M77. This modelling demonstrates that the proposed levels of growth can be accommodated within the limits of London's highways network, providing the proposals of the Mayor's Transport Strategy (MTS) are implemented alongside. Without policies around parking restraint and mode shift for example, this will not be possible.

2.2 With these proposals, significant growth can be accommodated with lower overall levels of peak vehicle kilometers (as shown by Figure 1) reducing the negative traffic, including on road danger, delays and road maintenance requirements. Rates of traffic congestion during peak periods would be similar to today (as shown by Figure 2), despite a significantly higher population. We have provided the GLA with additional relevant information on the role of our strategic models which is included in the Mayor's statement on this matter.

2.3 A significant amount of the growth tested is located in outer London, reflected in the housing targets set in the draft London Plan. In outer London, the MTS would reduce road delays, as demonstrated by higher average vehicle speeds (again shown in Figure 2). This would help mitigate impacts of growth in outer London on the motorways and strategic trunk roads in and around the city. However, it should be noted that growth outside of London, and the continuation of high levels of car parking, ownership and use will impact the motorways and strategic trunk roads in and around London. Investment in transport infrastructure must be balanced in favour of public transport and active travel options outside of London as well as inside to effectively manage the road network. This includes the need to consider whether capacity increases on the motorways is inducing additional traffic rather than alleviating congestion.

2.4 Opportunities for large scale development in outer London are predominately within Opportunity Areas (OAs), or in and around town centres. Development in OAs will be planned and designed alongside walking, cycling and public transport provision from the outset, enabling these areas to be less car dependent than those surrounding them. This is supported by Policy SD1 and paragraph 2.1.4, which sets out the role of Opportunity Area Planning Frameworks (OAPFs). These can help maximise the use of sustainable modes and will be supported by strategic transport studies which can identify how potential negative transport impacts can be mitigated. In some cases, this can involve more detailed transport modelling (supported by TfL's Highway Assignment Models) to test the impact of development in OAs, which can in turn inform, for example, parking standards for the OA based on the capacity of the surrounding road network to support the proposed level of development (as is the proposed approach in the Old Oak and Park Royal OA[1]).

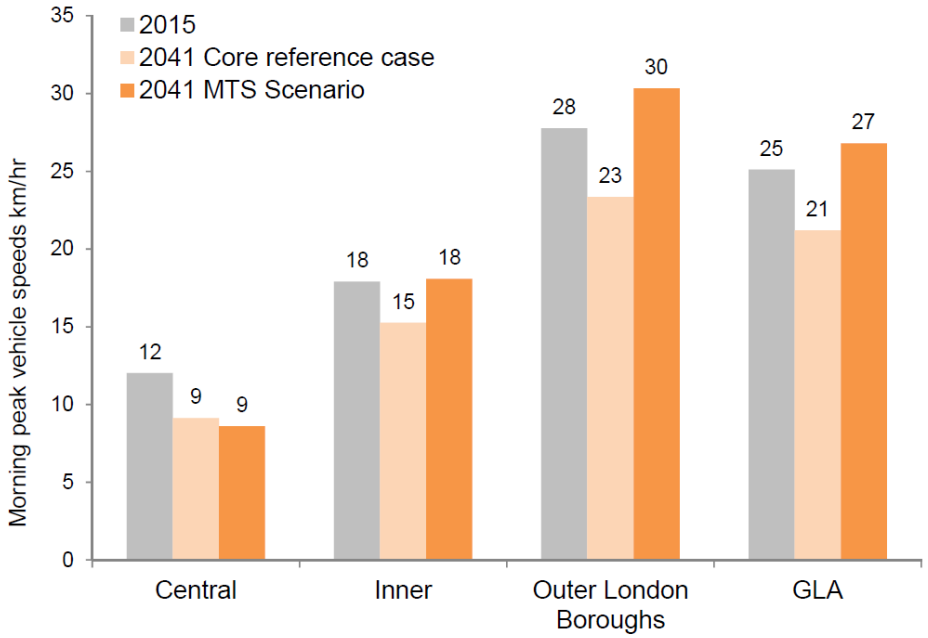
Figure 1 – Percentage change in morning peak vehicle kilometres, 2015 to 2041 in the core reference case and MTS scenario



Source: Figure 2.3, Mayor's Transport Strategy: Supporting Evidence Outcomes Summary Report Addendum

[1] OPDC Old Oak and Park Royal Development Corporation Car Parking Study: Local Plan Supporting Study (June 2018), https://www.london.gov.uk/sites/default/files/6._car_parking_study_2018.pdf

Figure 2 – Change in London wide morning peak vehicle speed, 2015 to 2041

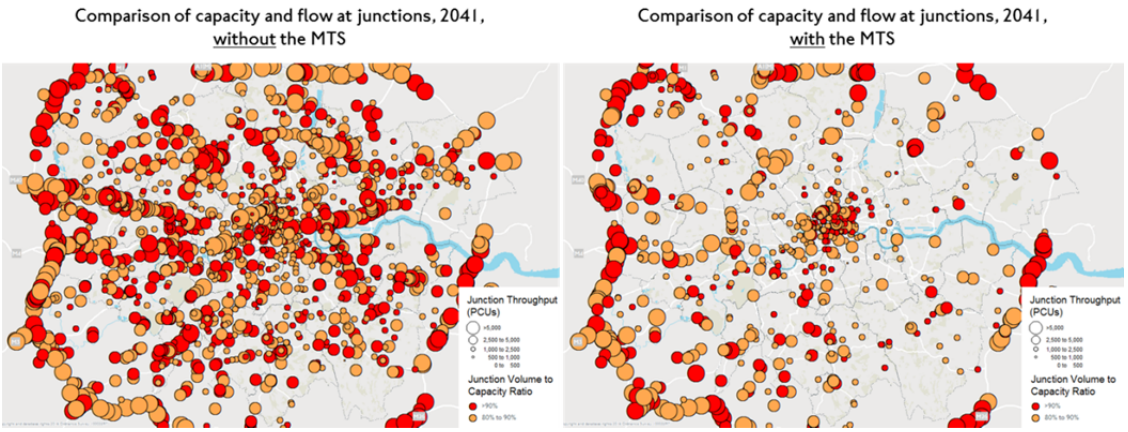


Source: Figure 2.4, Mayor's Transport Strategy: Supporting Evidence Outcomes Summary Report Addendum

2.5 Some specific roads and junctions will experience delays at certain points (as shown by the right-hand side of Figure 3) but this is already true today and to some extent inevitable given the draw of strategic roads and (space-constrained) locations such as central London and some town centres. To a certain extent, some congestion is a natural consequence of a successful and vibrant economy, although beyond a point congestion becomes an economic problem.

2.6 While there is potential for higher congestion than today if no interventions other than those in the reference case are implemented (as shown by Figure 2 above and the left-hand side of Figure 3 below) this is not actually realistic in practice. A scenario without further investment or demand management measures over a 20 year period would not be able to successfully achieve the levels of growth set out in the Plan. In particular, if congestion levels were to rise significantly, the case for road user charging at some point by 2041 (as included in the MTS modelling and Table 10.1), would be strengthened. We will be considering how a future scheme (beyond 2020) could be designed to deliver balanced outcomes for Londoners. Any future proposals would be preceded by detailed feasibility work and subject to consultation with stakeholders and the public.

Figure 3 – Most congested junctions in 2041 with and without the MTS interventions



3. REDUCING THE IMPACT OF DEVLEOPMENT

3.1 The draft Plan seeks to ensure that future development in London is concentrated in well connected locations. This promotes lower car dependency and limits the impacts on the strategic road network in and around London compared to more dispersed patterns of development, including a greater proportion of development outside the of the GLA boundary where sustainable travel choices are sometimes more limited.

3.2 Meanwhile, Policy T4 sets a requirement for robust assessments of transport impacts and appropriate mitigation to be secured where any adverse transport impacts are identified. These are complemented by a range of policies that promote walking, cycling and public transport use over car travel.

3.3 In particular, the parking standards contained in the Plan would mitigate the impact of new development on the road network, including in terms of safety, reliability and operations. They do this by applying restraint where public transport alternatives are most available and where there are local amenities accessible by foot and cycle. OAs are specifically referred to in a number of the standards, reflecting the scale of development in these areas and the opportunities to design and plan walking, cycling and public transport use from the outset. For example, the residential standards require car-free (with the exception of disabled persons parking) development in inner London OAs, and 0.5 spaces per unit across outer London OAs (with a standard of car-free applying at PTAL 5-6 within OAs).

3.4 In their consultation response to the draft Plan, Highways England expressed concern at the clause enabling outer London boroughs to adopt minimum residential parking standards in areas of PTAL 0-1, which they argue could adversely impact the motorways and strategic trunk roads that they manage. We understand this concern but would note that maximum standards still apply in these areas and a significant majority of outer London development will be in areas of PTAL 2-6. The approach to managing any impact from these areas will be part of the wider approach set out in the previous section of this statement.

3.5 Policy T7 Deliveries, servicing and construction also plays an important role in managing demand for the motorways and strategic trunk roads in and around London. The Policy seeks to minimise impact on the road network from freight movements associated with new development by:

- requiring area-based plans to include freight strategies that seek to co-ordinate and reduce freight movements;
- protecting the role of water and rail-based freight to minimise the need for road freight and;
- requiring development proposals to submit Construction and Logistics Plans and Delivery and Servicing Plans to reduce the impact of these activities.

3.6 Paragraph 10.7.6 also refers to the Direct Vision Standard that is being developed by the Mayor and TfL to support better, safer design of freight vehicles to help reduce road danger as London grows.

4 CONCLUSION

4.1 While the draft Plan does set out significant growth, including in outer London, this can be delivered sustainably with managed impacts on the road networks in and around London through the measures set out in the MTS and the policies of the Plan.

4.2 Highways England note in their representation the previous constructive engagement that has taken place with TfL and the GLA on Economic Growth Plans and that they would welcome the opportunity to continue to build on previous dialogue on the draft London Plan to better understand the impacts on motorway and strategic trunk roads. We, along with the GLA, would welcome continued engagement, including in relation to strategic transport modelling and any OAPFs or other strategic studies relevant to their network.