

London Plan Examination in Public

Matter 76 Transport Schemes and Development

Friends of the Earth (755)

M76. (a) Are all of the transport schemes set out in Table 10.1 necessary and adequate to deliver the development proposed in the Plan? (b) In the context of the identified funding gap of £3.1billion per year, is there a reasonable prospect that the transport schemes set out in Table 10.1, and any other essential strategic transport schemes, will be delivered in a timely fashion in relation to the timing of development proposed in the Plan?

1. Friends of the Earth's view is that the schemes in Table 10.1 are mostly necessary with some key exceptions, but not sufficient. We outline some specific points as follows:
 - a) The list includes 'Borough-led traffic reduction strategies (including workplace parking levies)', but is not adequate as there is nothing for a strategic London-wide road traffic reduction strategy, which should be added. Reduction in car miles of at least 20% is needed to achieve the necessary cuts to transport carbon emissions (and would also help cut air pollution):
https://policy.friendsoftheearth.uk/sites/files/policy/documents/2019-01/More_than_electric_cars_final.pdf (from <https://friendsoftheearth.uk/climate-change/its-high-time-make-bus-travel-free>)
 - b) The list includes 3 entries on the Ultra Low Emission Zone (ULEZ), which we consider should be amended to the following to allow for variation / strengthening of the existing plans, as we do not consider these to be adequate. We consider that the ULEZ should be London-wide for all vehicles and come in sooner:

"ULEZ in central London

ULEZ expansion beyond central London

ULEZ in inner London

ULEZ London-wide for buses, coaches and HGVs"
 - c) The list includes several entries on buses, but Friends of the Earth considers that nationally free buses, initially at least for under 30s, is key to delivering the necessary cuts to transport climate emissions (and would also help cut air pollution) - and Friends of the Earth considers that in London fare structures should be re-evaluated to help modal shift as much as possible:
<https://friendsoftheearth.uk/climate-change/its-high-time-make-bus-travel-free>

- d) The list includes “Bus network: Silvertown Tunnel and associated bus services”. The Silvertown tunnel as proposed is a 4-lane road crossing and (unless this was indeed just a bus scheme, with cycle/walk - but even then this would likely not be a cost effective option - it should be removed. It is not necessary and indeed, even if tolling would constrain traffic as TfL assert, would worsen air pollution already over limits for some people which would be at odds with policies in the Plan and with requirements. There are better ways to resolve the existing congestion problems at the Blackwall tunnel. What is proposed would effectively be a very expensive congestion re-distribution scheme as traffic getting across the river quicker just got caught up slightly further away. Proposed spend must be more effectively used in facilitating access without road-building (such as referenced in new paragraph 10.3.5A).
- e) The list includes three entries on river crossings, and we consider that the first of these three is not necessary and should be removed. There is no place for any river crossing in East London other than public transport (to which should be added walk and cycle provision), supported by river services extensions, such as referenced in new paragraph 10.3.5A - ie no place for any crossing including general road traffic. Thus we suggest the following amendment is necessary:

~~— River crossing at
Gallion’s Reach
and/or Belvedere
(subject to further
assessment)~~

- River crossings
(public transport,
cycle and walking
provision) in East
London (subject to
further
assessment)

- River services extensions to the east (subject to further assessment)

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Matter 77

Friends of the Earth (755)

M77. Would the successful implementation of the policies in the Plan, including delivery of the transport schemes set out in Table 10.1, be likely to achieve (a) the target of 80% of all trips in London being made by foot, bicycle or public transport by 2041, and (b) the mode shares in central (95%), inner (90%) and outer (75%) London set out in Figure 10.1A?

1. Friends of the Earth's view is that the schemes in Table 10.1 are mostly necessary but may not be sufficient. See our statement on matter 76.

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Matter 80

Friends of the Earth (755)

M80. How would delivery of the Plan’s transport policies and schemes affect (a) the objectives of Policy GG1 “building strong and inclusive communities” and advancing equality of opportunity as required by the Equalities Act; and (b) the objectives of policies GG3 “creating a healthy city”, SI1 “improving air quality”, and SI2 “minimising gas emissions”?

1. Friends of the Earth’s view is that the schemes in Table 10.1 are mostly necessary (see M76 above) but some are counter productive. Overall the list is not sufficient, for example excluding a London wide road traffic reduction strategy. See our statement on Matter 76.

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