

The Mayor's Draft Transport Strategy, London TravelWatch response

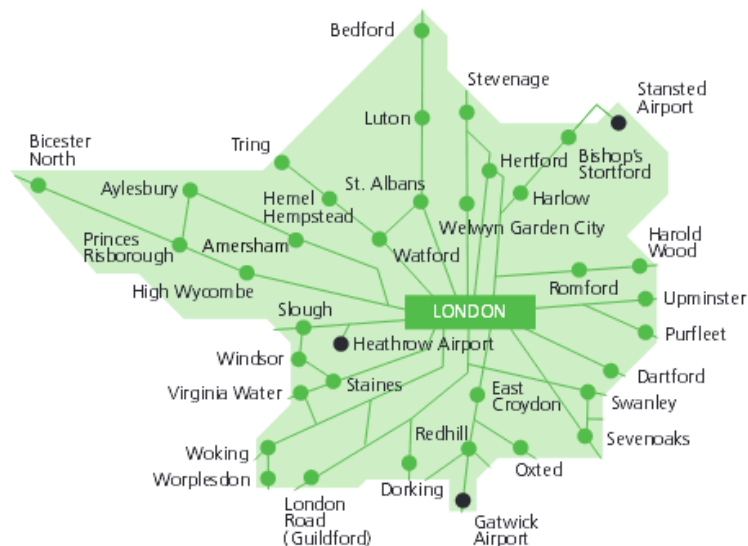
London TravelWatch is the independent, multi-modal body set up by Parliament to provide a voice for London's travelling public. This includes users of rail services in and around London, all Transport for London (TfL) services (bus, Tube, DLR, trams, taxis) and motorists, cyclists and pedestrians using London's strategic road network. We are funded by and accountable to the London Assembly.

Our approach

- We commission and carry out research, and evaluate and interpret the research carried out by others, to ensure that our work is based on the best possible evidence
- We investigate complaints that people have been unable to resolve with service providers – in 2016–17 we got more than 11,000 enquiries a year from transport users and took up 2,400 cases with the operator because the original response the complainant had received was unsatisfactory
- We monitor trends in service quality as part of our intelligence-led approach
- We regularly meet with and seek to influence the relevant parts of the transport industry on all issues which affect the travelling public
- We work with a wide range of public interest organisations, user groups and research bodies to ensure we keep up to date with passenger experiences and concerns
- We speak for the travelling public in discussions with opinion formers and decision makers at all levels, including the Mayor of London, the London Assembly, the Government, Parliament and local councils.

Our experience of using London's extensive public transport network, paying for our own travel, and seeing for ourselves what transport users go through, helps ensure we remain connected and up to date.

Our aim is to press in all that we do for a better travel experience for all those living, working or visiting London and its surrounding region.



London TravelWatch welcomes the Mayor's Draft Transport Strategy. The Strategy takes on board the key priorities of London's transport users that we published during the last Mayoral election:

- Sustained investment to meet London's ever-growing transport needs;
- A road network that makes the best use of scarce capacity;
- As many of London's rail services as possible co-ordinated by the Mayor;
- Reliable bus services that keep up with the pace of change;
- Simpler fares, better value for money and a fairer deal when things go wrong;
- A co-ordinated approach to transport interchanges;
- Transport networks accessible to all;
- Reliable, accessible and timely information;
- Everyone able to travel without fear of crime or anti-social behaviour;
- Disruption effectively managed.

The strategy recognises the importance of improving London's streets for pedestrians and cyclists. It promotes a visionary approach to road safety with a target to reduce serious injury and death on London's streets to zero. This is clearly crucial for transport and societal reasons.

The strategy proposes investment in rail-based public transport and improved customer service that should mean less crowded, more attractive and easier travel. There are real incentives for drivers to switch to other modes to reduce congestion. This will allow for quicker bus travel and safer and more pleasant journeys by foot and cycle.

Passengers will welcome the commitment to more affordable fares - particularly those that have moved to outer London but still work in the central area. Disabled and older people will certainly benefit from the target to halve the additional journey time for those using the step-free network. We know from our research that improvements to access will be welcomed both by those passengers that

need step-free facilities, but also other passengers who may occasionally need a step-free route or know others that do.

London TravelWatch very much welcomes this bold strategy. It has the potential to ensure London's transport leads the world. It provides Londoners and London's visitors with genuinely greener, cleaner, healthier and, most importantly for us, more efficient, quicker, affordable and safe ways of getting around the capital.

There are of course challenges to achieving all of this, particularly in making swift early progress to build public confidence that real change is happening. However, London TravelWatch believes it is an eminently achievable strategy if Londoners and London government work together and bold decisions are made as soon as practicable. London TravelWatch looks forward to playing its part in promoting the strategies, policies and plans needed to achieve these outcomes.

Below are responses to the questions posed in the consultation draft. Please contact Vincent Stops: Vincent.stops@londontravelwatch.org.uk, if anything is unclear.

Chapter 1 – The challenge

Chapter one sets out the challenges London faces going forward to 2041: population and employment growth; congestion on London's streets and overcrowding on public transport along with a need to address environmental and public health issues.

London TravelWatch recognises that London is growing and that to accommodate growth and improve the experience of transport there should be fewer car journeys and more walking, public transport and cycling journeys. There are difficult trade-offs to be made, but it is crucially important to London's travelling public that the nettle be grasped.

There should be continued investment in rail based public transport, improvements to the customer service offer of public transport and priority for buses on the streets wherever this will materially improve bus speed and reliability. More pleasant, direct and safer walking and cycling environments are needed to enable and encourage these modes.

London TravelWatch's seeks to represent the interests of all Londoners' and London's transport needs. But, it is impossible for the capital's road capacity to meet all the needs of private car users. Making the best use of scarce capacity inevitably means reducing car dependency and more active travel. This in turn will have wider societal benefits. These include better air quality, lower road casualties, a healthier more active population, a lower carbon footprint for London and improved public spaces and climate resilience. In turn this should lead to a happier and more productive city.

Chapter 2 – The vision

Chapter two sets out the Mayor's vision is of more active travel, clean air and a smaller environmental footprint; 80% of trips should be by foot, cycle or public transport. There should be less crowding on London's public transport and a reduction in the difference in travel time between those that do and do not need to use step-free access routes. More housing should be directed towards areas accessible by foot, cycle and public transport. There is a vision of zero killed and seriously injured on London's streets.

London TravelWatch very much supports this vision. We want to see more active travel, fewer road casualties and less transport related emissions. Crossrail 2, along with numerous other infrastructure proposals will be needed to increase rail capacity. We welcome the new target for accessibility and the principles of good growth as described.

We support the aim of 80% of Londoners' journeys being undertaken by foot, cycle or public transport. This is a challenging target, that will only be achieved by sustained investment in infrastructure, better customer service and managing the demand for road space by a fundamental change in the way road use is paid for. It will also require an acknowledgement of the need to improve links between Greater London and the wider south east.

A key part of the vision is a much better performing National Rail system. London TravelWatch advocates that this is best achieved by devolution, but if this is not to be then TfL must persuade national government to improve the performance of National Rail operations, because at present it is simply not good enough.

Chapter 3 – Healthy streets and healthy people.

This chapter seeks to promote active travel. It recognises that public transport use can, along with cycling and walking provide some of the activity one is advised to integrate into ones daily life. The chapter promotes better and safer pedestrian and walking environments along with support for bus services.

Policy 1 – Healthy streets

London TravelWatch has been a consistent supporter of developing good quality walking and cycling environments. The Board particularly supported the TfL commissioned work of Jan Gehl: *Towards a fine city for people*.

To create good walking and cycling conditions good design is important, but so is good management of London's streets. For example pedestrians, particularly older and disabled pedestrians don't want pavements that are obstructed with all manner of advertising boards, waste, unlicensed chairs and tables etc.

London TravelWatch has had some success in persuading TfL to take a more active approach to keeping its pavements clear of highway obstructions, but it needs to do much more. Only a handful of London boroughs undertake their legal duties properly in this regard. Our research has demonstrated that many boroughs allow their pavements to be badly obstructed. Some defend the rights of traders to obstruct the pavement. The map below shows how the London boroughs perform.

Transport for London and the London boroughs must do much more to manage their pavements and particularly keep them clear of unlicensed obstructions.



Green	streets are clear of pavement obstructions;
Yellow	some streets are clear of pavement obstructions (targeting is undertaken);
Pink	streets have pavement obstructions, but they are located next to buildings in response to limited enforcement.
Red	streets have many pavement obstructions on them;

The maintenance condition of the carriageway and footway affects everyone, particularly pedestrians, cyclists and bus passengers. Standards of carriageway and footway maintenance are not high enough. The Board was particularly disappointed when, a few years ago, TfL reduced its target for the percentage of highway that should be in good repair.

London TravelWatch advocates that everyone should follow the rules. Parking enforcement and roads policing generally improves the experience of users. London TravelWatch wants to see more enforcement of the rules.

To deliver a good pedestrian and cycling environment across London we want to see the following programmes delivered by TfL and the boroughs through the Local Implementation Plan (LIP) process:

- dropped kerbs where they are not provided;
- street nameplates, where they are missing;
- a continuing programme of accessible bus stops and a plan to convert 'hail and ride' services to fixed stops;
- a programme to roll out Legible London wayfinding, but as originally envisaged, with 'infoliths', not the multi-fingerposts that have been installed in recent years. The fingerposts should be replaced.
- a programme of seating;
- a programme of de-cluttering;
- parking enforcement and controlled parking zones.
- side road entry treatments (raising the carriageway to footway level and reducing turning radii.)
- advance cycle stopping areas (ASLs) at signalised junctions.
- targeted road safety interventions;
- closure of minor streets to through traffic.

London TravelWatch has undertaken research looking at affordability of public transport for those living in outer London and recommended that rail stations should become cycling hubs. The graphic in Appendix 1 shows isochrones¹ from all zone 5 and 6 stations, that can be accessed by either a 15 minute cycle or walk journey.

There should be consideration of a programme of area wide investment in the streets around outer London stations, within a 15 minute cycle ride to enable cycling to the station.

¹ An isochrone is a line on a map connecting points relating to the same travel time.

Policy 2 – Vision zero for road safety

The adoption of a Vision Zero target for road safety is welcome. There has been a substantial reduction in casualties over a number of years, but still too many are injured on London's streets. London TravelWatch supports a data-led approach to road safety with initiatives to maximise casualty savings per pound spent. This will mean slower speeds, traffic reduction and a focus on those locations where most injury occurs, i.e. busy road intersections.

It is important that there is a balanced approach to roads safety insofar as some interventions may well be safer for one mode, but be problematical for another. For example the introduction of pedestrian refuges may help pedestrians cross more safely, but will be regarded as a dangerous pinch point for cycles.

London TravelWatch wants to see better enforcement of the rules of the road whether they be associated with road safety, parking, highways enforcement etc. Everyone will benefit from better behaviours and compliance with the rules. We have particularly supported operations ATRIUM, FOIST and Safeway which target non-compliant use of London's streets and the illegal use of vehicles. London TravelWatch advocates for more roads policing than is presently the case.

Motorcyclists are the most vulnerable users of London's streets, and as such more needs to be done to highlight the dangers of motorcycling, awareness of motorcycles and the need for better training and enforcement, though it is recognised that tackling motorcycle safety is difficult because of the speed differential between motorcycles and most other users.

Motorcyclists are concerned about the narrowing of lane widths. They need room to be able to filter through queuing traffic. This issue needs some study particularly as lane widths are often narrowed to accommodate cycle lanes.

The introduction of motorcycles into bus lanes was initiated despite the mixed evidence from trials. There was evidence that motorcyclists were less safe in specific bus lanes, but generally there was no statistically significant effect. At the time, London TravelWatch was concerned with the rigour of the network assessment that was undertaken. A further assessment was agreed between London TravelWatch and TfL, but was not carried out. TfL should undertake this assessment and justify this proposal in the light of it.

London TravelWatch recognises the disproportionate role of heavy goods vehicles in fatalities and advocated that HGVs are better designed to suit London's streets.

The differentiation in the strategy between road casualties caused by London buses and all other road casualties is strange. We would, of course, expect TfL to lead in procuring bus operations that are as safe as they can be with a vision of zero serious injuries and deaths.

Policy 3 – Tackling crime on London’s transport networks

London TravelWatch recognises the priority of tackling ‘high harm’ crimes: terrorism etc, but the Roads and Policing Command is the only policing organisation that can keep London’s Red Routes moving and tackle lower level nuisance. London TravelWatch wishes to see these ‘day job’ activities of the policing command recognised in the strategy

Policy 4 – Priority for space-efficient modes

Tackling congestion is key to tackling many of the issues transport users have with London's road network. London TravelWatch supports the prioritisation of the most space efficient modes, bus, walk and cycle. This will in turn improve conditions for essential journeys and those that need to use private transport.

That said, there is much latent demand for travel and so the benefits of modal switch and traffic reduction must be 'locked-in', otherwise the benefits will be lost as freed up road space is used by others. This will mean a system of road user charging is necessary to tackle congestion on London's streets. Commercial deliveries will use the roads more efficiently, and may turn to freight consolidation etc, although a road user charge would only be a small part of the cost of operating a freight vehicle.

Car clubs are supported with the caveats suggested in the strategy.

From observation some car club users are not paying directly for entering the congestion zone. There seems no reason why congestion charge should not apply to car club use because this will reduce the disincentive to enter the central area by private transport.

The Central Area Congestion Charging Zone has been effective in reducing travel demand within the zone. However, there has also been a reduction in traffic capacity and additional use of exempt vehicles (PHVs using hailing Apps) in the central area. This has led, in part, to congestion problems returning to the central area. London TravelWatch advocates that PHVs should be charged and operational charging hours increased, to help improve the performance of bus services that use the central area.

London TravelWatch advocates for a wider and more sophisticated roads user charging scheme to help bus services to operate efficiently. This is vital in the context of the modal switch to bus that this strategy implies. Whilst a London-wide scheme would be most beneficial it is recognised that developing such a scheme may proceed more easily in boroughs that are most affected by congestion and the negative impacts of motor vehicles.

Q10 Policy 5 & 6 – Air quality and a zero carbon transport network

London TravelWatch's remit is to represent the needs of London's transport users. As such, air quality is not core to our work. That said, transport is a major source of harmful emissions and transport users are affected by poor air quality as they go about their travels.

We therefore support measures to improve air quality and believe our policies contribute to the improvement of air quality. In the debate about emissions we note that Euro vi engines in buses are a very large step forward and provide good value for money with respect to improving air quality. Other technologies are worth developing, but will necessarily be longer term.

The ultra low emission zone and other associated proposals are supported generally. However, the coach industry is an important element of passenger transport in London, particularly for people on low incomes. We understand this industry will have difficulties in speedy compliance. A challenging, but realistic target for compliance should be set for this industry.

London TravelWatch would support a transfer of VED for vehicles registered in London to TfL in order to support the Mayor's policies.

Converting London's vehicle fleet to be powered by electricity is a laudable objective and so is generally supported. However, providing electric charging points for users at the roadside is problematic insofar as numerous charging points will be added to already cluttered pavements. This strategy, nor the existing plans for electric vehicle charging, provides a comprehensive plan setting out how a large number of electric vehicles will be charged on London's streets. There needs to be more clarity as to how vehicle charging is going to be delivered in London, at the roadside.

The public sector fleet of vehicles that operate within a local area and that return to base would seem best placed for early conversion to low emission operation.

Whilst a zero emission zone is supported it may well make sense to develop a single charging system to address both congestion and emissions. At the very least ULEZ should be introduced in a manner that could later on incorporate roads user charging.

The text notes that all London's rail lines are expected to be electrified during the plan period. However, in order for electric trains to be operated, the wider network must be electrified or bi-mode vehicles operation will be needed. It is of note that bi-mode vehicles are inefficient both in their use of line capacity and energy.

The Mayor and TfL need to work to secure an electrification programme for the remaining railways in London that are not so at present. This will mean ongoing dialogue with the DfT and Network Rail. The lines include those from Old Oak Common and Marylebone over the Chiltern route, West Ealing to Greenford and freight only routes such as the Dudding Hill Line and the Kew Curves. It would also be useful to secure commitments to electrify routes such as Hurst Green to Uckfield,

the North Downs Line and Ashford to Ore, which although not located within London have a direct impact on London rail operations.

We support the proposal to use TfL land for solar energy generations, but would also suggest consideration of measures to encourage regular public transport users to invest in solar panels at home e.g. by giving a one year discount on a season ticket price for a new solar installation. There may also be opportunities for micro-hydro electric generation using culverts and rivers that pass underneath railways owned by TfL. This would have the added benefit of protecting services from storm damage.

Policy 7 & 8 – Green infrastructure, historic heritage and Climate change resilience

London TravelWatch supports proposals to introduce street trees. From a transport perspective the introduction of street trees will change the look and feel of the street and help slow traffic and encourage active travel.

There is a conflict between introducing street trees that would generally be placed along the outside of the footway and introducing cycle lanes along the same outside of the pavement or adjacent to it. Some cycle schemes that have been implemented will have reduced the space for street tree planting. Care also needs to be taken to ensure that trees do not encroach on the swept path of buses using the street.

London TravelWatch supports sustainable drainage. Puddling can be a deterrent to cycling on rainy days and can adversely affect pedestrians where there is inconsiderate driving by motorists.

London TravelWatch supports proposals to reduce noise associated with London's transport systems, although we note that vehicles that are too quiet could pose some safety risks that will need to be addressed.

Chapter 4 – A good public transport experience

This chapter sets out policies to increase the capacity and accessibility of London's public transport networks, provide better information to customers and improve integration whilst ensuring that public transport remains affordable.

Policy 9 – Healthy streets and public transport, a whole journey

London TravelWatch is very pleased that there is recognition in the strategy that quality of interchange doesn't just start and stop at the curtilage of a station. There are some good examples where this has been well considered. Crossrail has been exemplary in this regard. Crossrail Ltd accept that the millions that use their stations are their passengers and they have considered how they would arrive and depart the new Elizabeth line stations to their transport objectives, not just the boundary of the station.

There are however, many poor examples, such as at Paddington station, where neither the local authority, nor the station manager (Network Rail) will take responsibility for the environs of the station nor how passengers arrive or depart. At Southgate LUL station the area around the station is inaccessible because of small steps, clutter and a wide busy road. Both these stations could be much better with a little investment.

Beyond the station TfL, the London boroughs and the operators need to consider how their passengers access their stations. London TravelWatch wants to see linked walk, cycle and public transport trips promoted, particularly in outer London. An area wide approach to walking and cycling to the station would benefit many passengers and, in the case of cycling, expand the catchment area of the station as shown in the graphic in Appendix 1 of 15 minute walk and cycle isochrones² for each zone 5 and 6 station.

Additional policy – Interchange matters

Whilst policy 9 recognises that the environs of a station must be of high quality there needs to be a specific policy about the interchange itself.

Interchanging between public transport services is part and parcel of travelling on public transport in London. Passengers accept this, but transport providers must minimise the necessity and inconvenience of interchange where they can. Where interchange is unavoidable, it must be of the highest quality it can be. London TravelWatch has promoted good interchange in its report³ *Interchange matters*. This found that there was room for improvement at many interchanges.

Good interchange is also important for transport providers because it will mean millions of passengers spend less time at their stations etc. and move through the system more efficiently. Interchange really does matter!

² An isochrone is a line on a map connecting points relating to the same travel time.

³ http://www.londontravelwatch.org.uk/our_work/interchange_matters

Policy 10 & 11 – Affordable travel and improved customer service

Affordable travel is really important to Londoners, particularly those that are living in outer London and travelling to work in central London. London TravelWatch recently undertook research⁴ looking at these issues because we know that there is a migration of less well off workers to the outer London boroughs, as a result of rising housing costs.

The Mayor should work with the DfT and National Rail train operators to establish a single tariff for fares on London's rail network. This would overcome the apparent disadvantage of areas of London with no TfL rail services

Improvements in customer service has to be a continuous process. These proposals are generally welcome. However, It must be emphasised that all of London's public transport services have to continuously improve. This is not happening at a quick enough pace across National Rail. It is not acceptable that passengers using one service get a much poorer service than others.

Transport for London has taken over National Rail operations as part of their London Overground service and have demonstrated that dramatic improvements to customer service can be made. It is disappointing that further devolution has not occurred. However, TfL is the strategic transport authority and must do all it can to ensure the rail industry plays its part in improving customer service.

Network Rail manages London's most important rail interchanges. Customer service at London's termini is not good enough. London TravelWatch has published Interchange matters⁵ which describes some of the issues at these termini.

Some passengers will not welcome proposals to enable telephone calls to be made on Underground carriages and platforms. Considerate use should be encouraged.

Additional Proposal – bus station standards

London TravelWatch is particularly pleased that the strategy acknowledges the need for bus station standards. This is an outcome of our work with TfL. There should also be consideration of important bus interchanges, for example at Elephant and Castle, where there are very large numbers of on-street interchanging bus passengers.

⁴ http://www.londontravelwatch.org.uk/documents/get_lob?id=4100&field=file

⁵ http://www.londontravelwatch.org.uk/our_work/interchange_matters

Policy 12 – Access improvements for disabled and older users.

London's public transport networks are becoming more accessible. There is good progress, both in terms of step-free access and improvements for those with sensory impairments. The initiatives for hidden disabilities are also welcome as are the various staff training initiatives. Many of these improvements will benefit all passengers, and are welcomed by passengers even where they don't directly benefit from them⁶.

We very much welcome the target to halve the additional journey time required by passengers having to use step-free routes. This is innovative and will reflect the everyday journeys of passengers.

It is acknowledged that rail station access schemes can be very expensive projects, but it is important that there is an ongoing programme of large, medium and small schemes both by Network Rail and the Underground..

Progress has been made to improve the accessibility of bus services. All buses are now low floor and almost 95% of stops are accessible, although it is disappointing that a few boroughs, and particularly Bromley, have not made the progress with accessible bus stops that they should have. The allocation of Local Implementation (LIP) funding should be used to incentivise some of these key accessibility interventions such as accessible bus stops.

In addition to bus services with typical fixed bus stops there are still a great number of 'hail and ride' services that are inaccessible to users that need the bus to pull up alongside the kerb. These are often in residential areas and the issue is the removal of kerbside parking. This has to be resolved and there must be a target established to drive this forward. There should be an accompanying budget that London boroughs can bid against.

We suggest the target should be: 'all London's bus services must have fully accessible stops, including 'hail and ride' services by 2020 where it is practicable'. It is accepted that a very small number of stops will remain inaccessible because of unique local conditions, but these should be kept to an absolute minimum.

⁶ http://www.londontravelwatch.org.uk/documents/get_lob?id=3780&field=file

Policy 13 – Bus service improvements

Whilst we accept the principle that bus service capacity should be adjusted to meet demand, it is of concern that it is not recognised in the strategy that there has been a sharp deterioration in bus service performance that has affected demand, particularly in central London. Passengers are abandoning the bus service because it is can be poor.

The various types of bus priority are all very welcome. We have made other suggestions to improve bus performance in the short and longer term. But, in principle, we want to see buses have priority on all of the streets that buses use. This does not mean bus lanes on every street, but it does mean a ‘whole route’ review looking at what might be done to improve journey times and reliability. Where the bus operates 24/7 so should the bus priority.

The exemption of PHVs from congestion charge should be reversed and there should be longer operational hours for congestion charging to help improve bus service performance.

Improving bus performance should mean an examination of the case for road user charging with a view to implementation.

Proposal 54 a) in the strategy suggests a limited extension of the operating hours of bus priority. This would be disappointing for bus passengers. It would also be disappointing for cyclists, whom have benefitted hugely from the introduction of bus lanes.

More ‘clear space’ for cycling, i.e. less kerbside parking would benefit cyclists greatly.

London TravelWatch has supported the proposals for Tottenham Court Road and Bank junction. Both prioritise buses, cycles and pedestrians over general through traffic which is banned during specific hours.

When there are road works undertaken along bus routes there should be a change to how bus services are treated and diversions implemented. Buses should be kept on their route in both directions with shuttle working through the road works via signal controls. All other motor traffic should be diverted away from the area of works.

Bus services use both TfL and local authority controlled roads and it is therefore important that the London boroughs are active in the implementation of bus priority and review of parking and loading on their roads. TfL should again promote a bus priority partnership and incentivise bus priority with a funding programme as part of the LIP process.

Additional policy – Bus priority

Quick and reliable bus operation is vital to this strategy’s ambition of 80% of journeys to be undertaken by foot, cycle or public transport. Buses should get priority on all

the roads they use. To enable the boroughs to do this there should be a bus priority fund as part of the LIP process.

Bus lanes etc. should operate for the same hours that buses do. Stopping, waiting and loading restrictions should be reviewed on all bus routes. Legitimate loading should be restricted to when it least affects bus performance.

Buses cannot easily be diverted from their route without inconveniencing passengers. There should therefore be a presumption that buses are kept on their route through road works and other traffic diverted around the worksite.

Policy 14 – Improvements to London’s rail network

Passengers want up to the minute information about disruption before and during their travel so that they can make the best choices as to how to minimise the impacts of disruption. During the 2012 Olympic and Paralympic games the transport industry in London demonstrated that it could work together to provide real-time information to passengers during times of disruption. This was undertaken under the banner of *One Team Transport*. London TravelWatch has been pressing the industry to mainstream this approach.

Giving passengers useful information when they need it would also benefit the transport industry by diverting passengers away from disruption and incidents rather than them arriving at, say, a major termini, only to be told to turn around and find another way to their destination.

Proposals for investment in new and existing rail infrastructure (Underground and National Rail) are welcome. The Mayor, through TfL, can directly invest in the infrastructure he controls, but influencing the rail industry is more difficult. It is vitally important that TfL can agree a broad programme of works, performance targets and customer service improvements with the rail industry. Without this it is difficult to see how the strategy can succeed.

London TravelWatch and the passengers it represents have seen the benefits of Transport for London’s operation of the London Overground. It has delivered more capacity, higher frequencies, better customer services and integration. Devolution of more of the suburban National Rail network to TfL is supported. London TravelWatch advocates that it is absolutely vital that London makes the best use of its existing railway infrastructure and that further devolution of the management of suburban rail to TfL will be necessary for this.

London TravelWatch supports improvements to transport hubs described in the strategy. Making the best use of the rail network means that all interchanges should be enhanced and links created.

London TravelWatch has specifically promoted Brixton, West Hampstead, Brockley, Park Royal, Old Oak Common and Lewisham stations as potential hubs in need of development to maximise their usefulness to passengers. There are other medium scale investments in new infrastructure that we have promoted in our report, *What’s Next for London’s Transport Infrastructure*⁷. We would welcome further discussion on these proposals.

We also advocate greater emphasis on promoting and enhancing smaller stations, as these often have available capacity and could play a much greater strategic role⁸.

London TravelWatch supports an increase in the capacity of the London Overground, Docklands Light Railway and Tramlink and urges investment in

⁷ http://www.londontravelwatch.org.uk/documents/get_lob?id=4254&field=file

⁸ http://www.londontravelwatch.org.uk/documents/get_lob?id=4401&field=file

additional interchanges where this would give greater orbital movement, thereby reducing pressure on the radial routes around London.

Given the volumes of public transport use being planned, one would expect proposals to come forward for additional light rail schemes. This seems an omission in the strategy.

London TravelWatch supports investment in freight lines, and urges investment in the Felixstowe – Ely – Peterborough – Nuneaton corridor to free up capacity on the Great Eastern and West Coast Main Lines, and the North London Line for additional local services and increased network resilience.

London TravelWatch supports enhancement to station capacity, but would ask that priority be given to improving the accessibility of stations such as Bank, where step free access to the Central Line platforms would substantially improve the capacity of the network as a whole as well as providing better access for disabled people.

Policies 15, 16, 17 & 18 – River services; public transport beyond London; public transport and the night time economy; taxis and private hire vehicles

London TravelWatch supports investment in transport in the wider south east. In particular, we would like to see improvements to the road and rail network that would enable the diversion of traffic that does not need to travel via London to do so. Examples of this might include the East – West Railway, upgrading the Felixstowe – Ely – Nuneaton railway, electrification of the North Downs and Ashford – Rye railways (improving access to Gatwick Airport), and better road links between the M3 and A31 in Hampshire and Surrey.

London TravelWatch shares the concern that HS2 needs to be fully integrated with Crossrail 2 at Euston and other rail lines at Old Oak Common. Euston needs to be fully redeveloped as a single station. Integration with London's other transport networks must be maximised and with better links with bus services at Euston.

Victoria Coach station is a very well managed facility in a central location. London TravelWatch has repeatedly argued for it to remain at Buckingham Palace Road because another site that could provide a similar facility is not available. Victoria Coach station is much valued by passengers and an important hub for those needing low cost inter-city transport. It cannot be stressed enough how important it is to retain this site or as much of it as possible until a site of equivalent utility to coach operations and passengers is identified.

Coaches are an important public transport facility for Londoners and visitors. London TravelWatch supports TfL's coach unit and the work it does.

London is a 24/7 city and its transport networks should cater for that wherever they can. This should include the operation of bus priority and priority for bus services on all the streets they use for as long as they operate. Too often parking controls end and parking enforcement ceases at 7pm. This is then followed by busy streets being parked up and bus services being delayed. This must change in order to catch up with night time activity.

London TravelWatch recognises the role of taxis and PHVs insofar as they fill the gaps in provision when other services are not available. Taxis have a particular role in respect of their capability to transport wheelchair users.

However, the arrival of App-hailable, PHVs means more vehicles are circulating in central London and at other busy locations waiting for a fare. This can cause congestion and delay bus services in particular. The Mayor has to address congestion caused by these vehicles and their impacts on bus services. London TravelWatch has called for PHVs to be subject to congestion charge to help bus services run sensibly in central London.

We recognise that the Mayor wishes to cap the number of PHVs because of their contribution to congestion. However, we are unconvinced this would work as hoped or is desirable for users. We have suggested that congestion charge (or a more sophisticated version of road user charging) is best applied to tackle congestion caused by PHVs.

The Mayor is seeking to restrict taxis and PHVs working outside of the area they are licensed in. This makes sense insofar as passengers would probably expect the vehicle to mainly work in its own licensed area. But if, for example, it delivered a person to Heathrow then there is a strong case for permitting the vehicle to be utilised on its return. Empty mileage contributes to traffic congestion, poor air quality and local nuisance through inconsiderate parking, and for consumers it increases the overall cost of their journeys. It is therefore in the interests of consumers and residents that empty mileage is kept to a minimum. There is also an argument that if 'familiarity' with the licensed area is an issue, it is just as important on the homeward as outward journey. There is no detriment if, for example, a London licensed taxi or PHV takes a passenger to Gatwick and another passenger back to London.

London TravelWatch has worked with TfL to introduce a small (A5) poster into Taxis with a picture of the driver and a note in a visible location describing how to complain about the service. We believe this would ensure the correct driver is driving the Taxi and allow passengers to report any issues they have with their journey, including safety and security issues. TfL had agreed to implement such a scheme, but have not yet done so, some five years later.

Chapter 5 – New Homes and Jobs

This chapter makes the links between transport, housing and employment.

Policy 19 – High density development at well connected locations

The direction of high density, car-free or car-capped, development areas well connected by public transport is welcome. This is typically those locations near a station or town centre, but could easily be further afield if the development site were within cycling distance of a station or town centre.

To enable the planning authority require a car-free or capped development there must be a controlled parking zone (CPZ) in place. This is not acknowledged or promoted in the strategy. The strategy should be supportive of parking controls where they are not already in place because they have many benefits for the transport and planning systems and are a pre-requisite of car-free development.

Four-tracking is the important element of the enhancement of the West Anglia line and is supported by London TravelWatch. This should also include, where appropriate, the replacement or closure of level crossings.

London TravelWatch strongly supports the extension of the Bakerloo line beyond Lewisham as a means of increasing rail capacity and connectivity throughout South East London and Kent⁹.

The extension of the Elizabeth line beyond Abbey Wood and a new London Overground link between Houslow, Old Oak Common and Cricklewood is supported.

Generally new stations on existing lines are supported. Areas around the existing Chiltern line stations between West Ruislip and Marylebone, could be developed provided that service levels at these stations could be improved. Other potential sites for new stations include Maiden Lane near King's Cross on the North London Line, Tufnell Park on the Barking – Gospel Oak route and London City Airport on the Abbey Wood branch of the Elizabeth Line. The Hounslow council proposal for a southern link to Heathrow via Bedfont is supported.

Unlocking growth through the introduction of bus services with high levels of priority is supported. However, this will often mean supporting bus services that do not meet TfL's bus planning criteria because their processes will tend to follow demand rather than lead it. That said, there will be major problems with funding where buses have to cover their full running costs.

[Please note that in paragraph 2 of page 213 there should be more precision in the use of 'planning'. Is this 'bus planning' or 'town planning']

London TravelWatch supported the Silvertown tunnel proposal particularly because of the resilience problems associated with the Blackwall Tunnel, for example when it

⁹ http://www.londontravelwatch.org.uk/documents/get_lob?id=3940&field=file

is blocked by over-height vehicles. But, the Silvertown tunnel was supported on the understanding that there would be a toll for users of both the Silvertown and Blackwall tunnels. The toll was to be at a level that would restrain vehicle numbers to be similar to at present. This toll may need to be quite high to deter additional vehicle use. New bus services were also to be part of the package. These commitments should be stated in the strategy.

London TravelWatch is likely to judge any major road crossing scheme on its own merits, but would support the caveats described in the proposal for river crossings.

Where TfL proposes to sell land for non-transport purposes there must be a thorough consultation as to what future transport uses such land may have. There must be a presumption in favour of retention of land that may have future transport uses or may be exchanged for land with a possible future transport use.

Decking over the A13, or indeed any other transport facility should be considered on its own merit. Bus stations that have been built over are often unpleasant for users, for example at Euston.

The proposals for better town planning are best practice presently and are supported. It is noted above, but not recognised in the strategy, that CPZs will be necessary to maximise the density of development sites.

It is critically important that surface access to London's airports by public transport is radically improved. The planning of surface transport access to London's airports should be a strategic issue.

Major infrastructure to London's airports: railways and roads are planned strategically, but not bus services because most of the airports are either outside of the London boundary or at the edge of London and so are unregulated. Within London TfL is the strategic transport authority and has powers to direct transport. Outside London there are multiple transport authorities with fewer strategic powers and reach. The planning of bus services to airports needs more consideration than can be afforded by local councils.

Heathrow and its growth are a particular issue. It is on the boundary of London and therefore on the boundary of the regulated and deregulated bus market. TfL and Hillingdon are the London transport authorities with numerous others outside of London. The coordination of all of these authorities is important and we are not convinced there is appropriate governance.

London TravelWatch would wish to see the establishment of a central London 'air hub' at Farringdon with its current and planned rail links to Heathrow, Gatwick and Luton airports, but also potentially to Stansted, Southend and London City airports.

Even without an expansion of Heathrow, there is a need to provide rail links to that airport from the west and south, giving connections to places such as Reading, Woking, Staines and Clapham Junction.

Gatwick Airport needs additional investment in rail and road links. For example, an upgraded A23 road from the M23 towards London bypassing the village of Hooley; more resilient rail networks; full electrification of the rail route from Reading to Gatwick Airport; provision of Chiltern Line platforms at West Hampstead to enable faster and easier rail journeys from North West London, Buckinghamshire and Hertfordshire (this latter also benefits Luton Airport).

Luton and Stansted Airports would benefit from the extension of Oyster / Contactless payment for fares on rail journeys to and from London. Luton also has a very good case for faster journeys to and from Central London by rail.

Stansted Airport is held back by lack of rail capacity and length of journey time to central London. Improving these by supporting the capacity proposals for these lines would be essential for modal shift away from road access at this airport.

Policy 20 – Impact of expanding Heathrow

London TravelWatch supports an appropriate and fair spread of funding for transport projects that would support an expanded Heathrow Airport. Airport expansion should lead to better public transport overall and not be to the detriment of existing users.

Chapter 6- Delivering the vision

Proposal 97 and policy 21 – Changing technology

There will be tensions between new technologies that will be attractive to some users, such as autonomous vehicles, and the needs of traditional bus services. This policy attempts to set out some principles for the management of new technologies and transport. As such it is welcome.

New technology has the potential to benefit London's transport users, but it is important that new services and technology are managed in the public interest. TfL must be horizon scanning new technologies and consulting with users on their potential impacts. To date TfL has not consulted London TravelWatch on emerging technologies which they should be doing if they want to respond as quickly and effectively as possible.

Policy 22 – Funding the strategy

London TravelWatch supports this strategy, but recognises it has to be funded and the costs will be high.

London TravelWatch supports reform of VED to ensure that funding for London's strategic roads is fair and equitable and drawn from road users. It should not continue to rely on cross subsidy from public transport fares.

London TravelWatch supports roads user charging because it will both reduce congestion and help to fund the strategy.

Policy 23 – Local implementation plans (LIPs)

It is important that LIP guidance and funding strike the right balance in terms of how prescriptive they are. London TravelWatch wants particularly to see some basic programmes supported by LIP funding, for example:

- dropped kerbs where they are not provided;
- street nameplates, where they are missing;
- a continuing programme of accessible bus stops and a plan to convert 'hail and ride' services to fixed stops;
- a programme to roll out Legible London wayfinding, but as originally envisaged, with 'infoliths', not the multi-fingerposts that have been installed in recent years. The fingerposts should be replaced.
- a programme of seating;
- a programme of de-cluttering;
- parking enforcement and controlled parking zones.
- side road entry treatments (raising the carriageway to footway level and reducing turning radii.)
- advance cycle stopping areas (ASLs) at signalised junctions.
- a bus priority fund

Policy 24 – Outcomes monitoring and delivery

Delivery is everything. The two key elements are the investment in additional rail capacity and the introduction of road user charging. Both need an associated plan and targets for delivery.

Bus priority and rail devolution is also key to the delivery of the strategy and should similarly have a plan with targets.

Not all of the strategy is within the control of TfL. Most importantly the delivery of capacity by Network Rail. This issue has to be addressed with a clear delivery plan developed with Network Rail.

Monitoring of the progress of this strategy is important. This process would benefit by robust qualitative and quantitative targets. There are some in the strategy, but consideration should be given to a suite of targets and actions that need fulfilling. London TravelWatch would welcome being consulted on these targets. The bus stop accessibility target of 95% stops to be accessible by 2016 is a good example of a target that really delivered for users.

Appendix 1

The graphic shows every zone 5 & 6 station with a 15 minute walking and cycling isochrones¹⁰.



¹⁰ An isochrone is a line on a map connecting points relating to the same travel time.

Created with the TravelTime platform