

TRANSPORT FOR LONDON

BOARD

SUBJECT: PROPOSED RESPONSES TO THE LONDON PLAN, ECONOMIC DEVELOPMENT STRATEGY AND HEALTH INEQUALITIES STRATEGY PUBLIC CONSULTATION DRAFTS

DATE: 10 DECEMBER 2009

1 PURPOSE AND DECISION REQUIRED

- 1.1 To seek the Board's approval to issue the draft responses given in the appendices to the following three draft Mayoral strategies for public consultation and to update the Board on the timetable for publication of these:
- (a) the replacement London Plan (LP);
 - (b) the Economic Development Strategy (EDS); and
 - (c) the Health Inequalities Strategy (HIS).

2 BACKGROUND

- 2.1 Drafts of the LP and EDS were published for public consultation on 12 October 2009, along with Mayor's Transport Strategy (MTS). The consultation period for all three documents ends on 12 January 2010. The EDS (and MTS) will be finalised for publication in spring 2010. The LP will be subject to an Examination in Public (EiP) as outlined in section 3 of this paper.
- 2.2 The Public Draft of the HIS was published for public consultation on 24 September 2009. The consultation period ends on 10 January 2010 and the strategy will be finalised for publication in 2010.
- 2.3 The Board commented on a draft response to the LP and EDS Statements of Intent (Assembly and Functional Body Consultation) on 24 June and these were subsequently sent from the Commissioner to the Mayor on 30 June 2009.
- 2.4 TfL comments on the HIS Assembly and Functional Body Consultation were sent in spring 2008, prior to the MTS Statement of Intent being published.
- 2.5 In addition to the response TfL made to the Assembly and Functional Body consultations, TfL wishes to make further comments on the public consultation versions. Appendices 1 to 3 contain suggested responses to the three strategies which would be sent from the Commissioner to the Mayor.

3 TIMETABLE FOR ADOPTION OF THE LP

- 3.1 The next stage in the LP's preparation is an EiP, which will take place in the summer and autumn of 2010. This will be led by an independent panel that will review responses received during the public consultation and decide on the issues to be discussed and who to invite to the EiP. It is likely that the GLA will request TfL support during the EiP, in particular to present the transport evidence.
- 3.2 The panel will then write a report to the Mayor recommending changes to the LP, which the Mayor can accept or reject. Following this, the Mayor will send a final version of the LP to the Secretary of State, who will decide whether any further changes are needed.
- 3.3 Once the EiP is complete, the Mayor can formally publish the replacement LP – this is expected in late 2011.

4 SUMMARY OF KEY LONDON PLAN ISSUES

- 4.1 TfL has worked very closely with the GLA London Plan Team and the Mayoral advisers in developing the LP and MTS alongside one another. This has meant that there is a high degree of consistency between the documents.
- 4.2 The points previously raised in TfL's response to the Assembly and Functional Body consultation have generally been addressed by the GLA.
- 4.3 As a result, TfL is supportive of the public draft LP. However, there are a small number of issues given in the draft response in appendix 1 that will require further liaison and clarification between TfL and the GLA prior to publication of the final LP. In particular:
 - (a) Underlying assumptions – growth forecasts, dates and sources of monitoring data will need to be checked to ensure consistency between those quoted in the MTS and London Plan.
 - (b) Representation of transport policies and proposals – TfL considers that the importance of Tube upgrades should afford a similar level of priority and importance as Crossrail in the LP. Also, the detailed wording of some transport policies and proposals needs to be revisited to ensure consistency; for example, the road network capacity policy needs to be reviewed against corresponding MTS proposals. A detailed point relates to the term 'Better Streets', which is used in a slightly different context in the two documents, so this requires clarification.
 - (c) Implementation – Delivery dates of some of the TfL schemes referred to in the LP are not consistent with TfL's updated Business Plan. Specifically, the LP table 6.3 (Indicative List of Transport Schemes) will need to be reviewed to ensure full consistency with MTS Figure 80 (Transport Strategy Implementation Plan).

5 SUMMARY OF KEY ECONOMIC DEVELOPMENT STRATEGY ISSUES

- 5.1 As with the LP, TfL has worked closely with the LDA and Mayoral advisers to ensure the MTS and EDS are developed alongside each other. The points previously raised in TfL's response to the London Assembly and Functional Body consultation have been addressed by the LDA.
- 5.2 As a result, TfL is supportive of the policies and proposals contained in the EDS Public Draft and proposes to raise only minor points where consistency with the MTS could be further strengthened as given in the draft response in appendix 2. Cross references and examples could be included to strengthen the 'transition to a low carbon economy' section. The response also suggests widening the scope of the references to transport by recognising the role of the DLR and London Overground specifically, and more generally emphasising the role of transport in widening opportunities to all Londoners. The economic development benefits of transport investment could be better highlighted in the EDS. Information in support of this is available in the MTS.

6 SUMMARY OF KEY HEALTH INEQUALITY STRATEGY ISSUES

- 6.1 The strategy identifies the health inequalities in London, the priorities for reducing them and the role to be played by key partners in order to implement the strategy.
- 6.2 The Mayor's strategic objectives to reduce health inequalities as outlined in the HIS are to:
- (a) empower individual Londoners and their communities to improve health and well-being;
 - (b) improve access to London's health and social care services, particularly for Londoners who have poorer health outcomes;
 - (c) reduce income inequalities and minimise the negative health consequences of relative poverty;
 - (d) increase opportunities for people to access the potential benefits of work and other forms of meaningful activity; and
 - (e) develop and promote London as a healthy place for all – from homes to neighbourhoods and the city as a whole.
- 6.3 The policies in the HIS which are relevant to transport in London are generally consistent with the MTS. They include promoting walking and cycling as active modes of travel, improving access to healthcare, improving road safety and the physical environment and reducing noise and air pollution. TfL, in delivering the MTS, will be giving a high priority to addressing these. However, there is scope for minor amendments to both the HIS and MTS so that the final versions of each are fully consistent, as requested in the draft response in appendix 3.

7 RECOMMENDATION

- 7.1 The Board is asked to NOTE the contents of this paper and to give in principle APPROVAL to the responses to the consultations contained in the appendices.

8 CONTACT

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Your ref:

Our ref:

DRAFT TfL RESPONSE TO THE LONDON PLAN PUBLIC CONSULTATION

Boris Johnson
Mayor of London
Greater London Authority
City Hall
More London
The Queen's Walk
London SE1 2AA

Date

Dear

Replacement London Plan Public Draft

Thank you for providing an opportunity for Transport for London (TfL) to comment on the replacement London Plan (LP) Public Draft, published on 12 October 2009.

The TfL Board has previously considered the initial proposals for the London Plan and a response was sent on 30 June. TfL Planning has been in regular liaison with Mayoral advisers and the GLA London Plan team throughout the drafting process to ensure that the public consultation drafts of the LP, Mayor's Transport Strategy (MTS) and Economic Development Strategy (EDS) are consistent.

TfL is fully supportive of the broad policies contained within the LP, such as emphasising the need to provide more transport capacity and connectivity to support London's growth, particularly in Outer London, the increased focus on town centres, the importance of linking land use and transport planning, committing to significant reductions in land based transport CO₂ emissions and air quality improvements and seeking improvements in a variety of modes of transport, in particular buses, walking and cycling. A number of suggested alterations are outlined below to improve further the integration of the LP and the MTS:

- Specific policy support for funding Crossrail and other strategically important transport infrastructure through planning obligations is also strongly supported. Both transforming the Tube and delivering Crossrail are vital to provide public transport capacity and connectivity that London needs. The benefits of transforming the Tube programme and Crossrail are interdependent and reference to the importance of completing the transforming the tube programme should be strengthened in the relevant LP policies and supporting text.
- A review of the LP alongside the draft MTS has shown a small number of inconsistencies which we will work with the GLA to address (largely due to changes occurring between the final print dates of each). In particular, figures, dates and sources of monitoring data will be cross-checked to ensure consistency, and information on transport projects will need to be revised to reflect the recently updated TfL Business Plan. It will also be important to

review LP table 6.3 (Indicative List of Transport Schemes) alongside MTS Figure 80 (Transport Strategy Implementation Plan) to ensure that they reflect the latest position. Also, specific wording on some key transport policies and proposals needs to be reviewed for consistency, for example, the road network capacity policy needs to be reviewed against corresponding MTS proposals and policy. Both the MTS and LP mention “Better Streets”, however the LP uses this term to cover a much broader area than the MTS – both need to reflect accurately the ‘Better Streets’ manifesto recently published by the Mayor (16 November).

- The MTS introduces and supports the concepts of ‘strategic interchanges’ that could assist orbital travel in London and reduce pressure on central London termini. This needs to be reflected in the LP.

On a more general point, the predicted financial environment and availability of funding will inevitably influence the implementation of the MTS beyond 2018, which in turn will affect support of the LP. As a long term strategy for London, it is important that the LP reflects the maximum scale of growth planned in the city. TfL, through the MTS and its Business Plan, will support this strategy as funding allows.

The current TfL Business Plan is built around the six goals of the MTS which have been developed from the vision and objectives of the LP. The Business Plan shows clearly how TfL will deliver its contribution towards the MTS and therefore the LP over the period to 2018. TfL has made substantial efficiency savings in order to be able to deliver its contribution to the strategy within the funding settlement agreed with Government. The Business Plan will deliver essential supporting components of the LP in the immediate term, such as the Tube upgrades and Crossrail and proposals for a revolution in walking and cycling.

TfL is of course also committed to working with boroughs and other partners as agreed in the London City Charter, for example through a simplified and less bureaucratic Local Implementation Plan process. Partnership working will be vital to deliver improvements on London’s road network as well as public transport networks, walking and cycling, in the freight and aviation sectors, all of which are key policy areas in the LP. Longer term elements of the MTS required to support growth are currently unfunded but TfL will continue to work with the DfT and other stakeholders and continue to make the business case for further funding, in particular the HLOS process for 2014-19, in order to continue to support the LP.

TfL looks forward to working with your advisers, the GLA London Plan team, LDA and others to ensure that the final versions of the MTS and London Plan are fully consistent, and that they provide the policy framework to help deliver your vision for London. To this end, TfL would be more than happy to provide support at the LP Examination in Public next year if required.

Yours sincerely

Peter Hendy

Your ref:
Our ref:

**TfL RESPONSE TO THE MAYOR'S ECONOMIC DEVELOPMENT STRATEGY
PUBLIC CONSULTATION**

Boris Johnson
Mayor of London
Greater London Authority
City Hall
More London
The Queen's Walk
London SE1 2AA

Date

Dear

Mayor's Economic Development Strategy for Greater London Public Draft

Thank you for providing an opportunity for Transport for London (TfL) to comment on the Mayor's Economic Development Strategy for Greater London (EDS) Public Draft, published on 12 October 2009.

TfL has worked closely with the LDA during the development of the EDS and Mayor's Transport Strategy (MTS) and the points previously raised in our response to the Assembly and GLA group consultation on the proposals for the EDS (30 June 2009) have all been satisfactorily addressed. We therefore fully support the broad policies and proposals set out in the EDS public draft.

In particular, we welcome the EDS emphasis on the role of transport in meeting the objectives of 'improving London's competitiveness', 'transforming to a low carbon economy', and 'investing in London's future'. These are consistent with the six MTS goals of supporting London's economic development, improving quality of life, improving safety and security, improving transport opportunities for all, reducing transport's contribution to climate change and supporting delivery of the London 2012 Olympic and Paralympic Games and its legacy.

To support the objective of the 'transforming to a low carbon economy' (Chapter 3) more mention should be made of the 'Climate Change Action Plan' (Feb 2007), your emissions reduction target of 60 per cent reduction in CO₂ emissions over 1990 levels by 2025 and the Climate Change Mitigation and Energy Strategy (CCMES) that is currently under development. This stretching target could be cited as a good example of how you are driving London's transition to a low carbon economy and creating economic opportunities as per the objective.

Reference should also be made to your Climate Change Adaptation Strategy, that is due to be published shortly. The economic potential of adaptation measures required to deal with the consequences of climate change should be emphasised.

In the analysis of the transition to a low carbon economy, it would be helpful to reiterate that this can only be realistically achieved through a coordinated, joint programme of Government, EU, Mayoral and industry support together with consumer incentivisation. This is particularly true in the technology-led transport sector. There are a number of examples of EU, Government and Mayoral actions and how they combine to gain the support of industry and provide consumer incentives that could be quoted to support this objective. These include a coordinated approach in the definition, operation and review of incentives across national, regional and local levels to promote price competitiveness of ultra low carbon cars. This could be tailored to achieve an agreed overall level of incentivisation and would send a clear signal to the market. In addition, national policy levers could include purchase incentives, road tax and fuel duties – local incentives could include emissions based parking charges and priority provision.

To strengthen consistency with the MTS, the EDS could take more account of the role of transport in meeting the objective of ‘extending opportunities to all Londoners’ (chapter 4). This is one of the six main goals of the MTS and as such it contains a number of policies and proposals to tackle deprivation, improve the physical accessibility of the transport system and support wider regeneration outcomes.

TfL welcomes the EDS emphasis on the need to increase public transport capacity, improve accessibility, limit congestion and increase the efficiency and effectiveness of the transport system. TfL can provide further information on the economic benefits delivered by the policies and proposals set out in the MTS and this could be used to support this. We can also provide updated versions of the maps 2 and 3 in Chapter 5 which illustrate the committed investment in transport. The EDS refers to investment projects such as Crossrail, Thameslink, the Tube improvements, mainline rail enhancements, and the vital role of bus services, especially for orbital movement and this is fully supported. It also mentions the need for a better use of the River Thames, especially for freight, the improvement of strategic interchange as a way of relieving pressure on Central London, and encouraging walking and cycling in town centres. In addition to these, we would request specific references to the DLR and London Overground and their importance in the regeneration of the areas they serve, particularly in East and South East London.

TfL looks forward to working with the LDA to ensure that the final EDS and MTS are fully consistent when they are published next year.

Yours sincerely

Peter Hendy

Your ref:

Our ref:

**DRAFT TfL RESPONSE TO THE MAYOR'S HEALTH INEQUALITIES STRATEGY
PUBLIC CONSULTATION**

Date

Boris Johnson
Mayor of London
Greater London Authority
City Hall
More London
The Queen's Walk
London SE1 2AA

Dear

Health Inequalities Strategy Public Draft

Thank you for providing an opportunity for Transport for London (TfL) to comment on the replacement Health Inequalities Strategy (HIS) Public Consultation Draft, published on 24 September 2009.

TfL is fully supportive of the broad policies contained within the HIS. We recognise the role of transport in helping to improve the health of Londoners and reducing the health gap between those with the best and worst health outcomes. The recently published draft Mayor's Transport Strategy (MTS) contains policies and proposals that seek to improve the quality of life for Londoners and to promote better transport opportunities for all Londoners. These give wider benefits to both physical and mental health by promoting active forms of travel (walking and cycling), promoting better access to jobs, promoting better access to education facilities and by improving access to healthcare facilities.

Key objectives of the HIS that are relevant to transport mirror those in the MTS and include promoting walking and cycling, emphasising the need to provide good access to healthcare, improving road safety, improving the physical environment in which we live and work, and reducing noise and air pollution.

We agree that the universal approach to encourage walking and cycling could exaggerate health inequalities by increasing walking and cycling among those groups who are already active, while having little impact on relatively inactive people. Therefore, the MTS seeks to 'mainstream' cycling as a transport mode, making it attractive to a wider range of people and putting particular emphasis on targeting less active people. A tailored approach will be required to maximise the cycling and

walking potential in all areas of London, for all socioeconomic groups, using information and behavioural change measures, such as smarter travel initiatives and major events. Improvements to the pedestrian and cycling environment as well as facilities to encourage more bike use will be targeted in areas such as outer London town centres and areas of higher deprivation, where walking and cycling are seen less as an alternative to car or public transport use than other areas, such as central London.

We also agree that interventions to increase walking and cycling will only be effective if crime and fear of crime can be reduced and road safety improved. The MTS outlines a number of proposals aimed at reducing crime and fear of crime, including increasing the visibility and accessibility of uniformed staff and officers, and ensuring safety and security considerations are incorporated into the planning and design of transport facilities. TfL is also committed to working with the boroughs to improve road safety further, particularly for more vulnerable road users, and the MTS contains a number of proposals to address this.

Around one million journeys undertaken in London every day are health-related, so TfL has been and will continue to work closely with the NHS to improve both organisations' understanding of the issues around access to healthcare. Planned improvements to improve the capacity, accessibility and connectivity of the transport system outlined in the MTS, for example the Tube upgrades, the bus network, DLR extensions and Crossrail will contribute to reducing health inequalities by improving access to jobs and services, particularly with the closer integration of land use and transport planning. More specifically, the 'Health Service Travel Analysis Tool' (HSTAT) can help TfL work with boroughs and the NHS to understand better the accessibility of existing and planned healthcare services. The use of the HSTAT tool and guidance is encouraged by TfL when considering any health service reconfiguration.

Addressing the health impacts of poor air quality is rightly given high priority in the HIS, and the MTS has a number of proposals to significantly reduce air pollutant emissions from ground based transport. These include cleaner buses and taxis, supporting and encouraging the uptake of low emission vehicles, such as electric vehicles, the continued operation of the London Low Emission Zone and potential further tightening of the standards, and the possible introduction of further emissions control schemes to encourage cleaner vehicles in London.

The HIS states that TfL will work closely with NHS London and London PCTs to ensure that physical proximity and ease of travel by public transport is prioritised in the development of polyclinics. TfL actively encourages the development of new health care facilities to be located near to existing public transport and in areas where it is easy for people to walk and cycle to the facilities wherever possible. Whilst TfL is working closely with NHS London and PCTs to achieve this, it is recognised that accessibility is not the primary factor in deciding the location of new facilities as clinical consideration are likely to be a key factor. However, TfL will continue to work with providers to ensure that transport has a high priority in all health service re-configuration.

The final version of the MTS could address with greater clarity the impact of health service changes on transport. This can be achieved by reflecting on what we learn from stakeholders and using the outputs from our partnership working with the NHS, particularly around understanding accessibility issues and ensuring that transport is not a barrier to gaining access to healthcare.

The HIS makes reference to the 'Way to Go' and the MTS Statement of Intent. It may now be more appropriate to reference the draft MTS, given that specific wording will have changed.

TfL looks forward to working with the GLA Health Inequalities team to ensure that the final HIS and MTS are fully consistent when they are published next year.

Yours sincerely

Peter Hendy