

**London Plan
London Sustainable Development Commission (84)**

Matter 6 (Chapter 6) Transport

Matter 6A

Policy 6.1 Strategic Approach to Transport

- a) Is there a need for greater reconciliation between the MTS and the London Plan to remove current discrepancies? Is there enough emphasis on transport requirements to support regeneration?**

The Plan's authors have taken the approach of treating the Plan as the spatial expression of the existing MTS which is a more detailed as a strategic and operational document. Consistency between the two for drafting and policy purposes is preferred and although the key to consistency will be the monitoring and implementation this process would be aided by clarity and consistency between the MTS and Plan.

In terms of regeneration, there is a presumption throughout the chapter that regeneration zones and outer London areas in particular can follow patterns of development which would avoided elsewhere provided sufficient capacity is created:

“...ensuring that new development that will give rise to significant numbers of new trips should be located either where there is already good public transport access accessibility adequate to support the additional demand or where there is a realistic prospect of additional accessibility, or capacity being provided in time to meet the new demand.” paragraph 6.15

We welcome the emphasis on phasing and timing of development but such an approach also requires careful handling to ensure that this does open the door to poor planning and transport schemes likely to lead to a reliance on car / road based development with its related extensive land use implications (e.g. high demand for parking, stand points which takes land from other productive and beneficial uses).

Regeneration should not be predicated on policies that regeneration zones require a kick start by relying on the kinds of development, land use and transport which would be unacceptable in other locations and would be likely to entrench patterns of development and travel behaviours which other areas are learning from and increasingly seeking to avoid.

The prospect of less funding being available for transport than in recent years has a bearing on regeneration policies and transport especially in outer London where buses and bus services (mentioned in general terms in the table on page 166) are likely to be important.

We support the policy to direct development to locations with existing good public transport or a commitment to improvements but in the longer term we recommend use of criteria to assess how schemes, such as those listed in Table 6.3 on page 133, become priorities and therefore secure funding support. Criteria could include, for instance:

- Supporting the accessibility needs of people on lower incomes;
- Avoiding placing undue pressure on existing infrastructure;
- Supporting major growth in an opportunity area;
- Avoiding requiring new road access unless priority is given to sustainable and mass transit modes; and
- Sound sustainable finance including revenue funding.

We advocate a wide stakeholder discussion (involving more than just transport stakeholders as stated in MTS policy 8) to secure wider support for and understanding of priority schemes and the way they are assessed.

b) Is there enough emphasis on the need to encourage behavioural change to reduce road traffic? Should there be a hierarchy of road users as previously?

Behavioural change is implicit to the Plan and the Plan's implementation depends on successful, rapid and sustained effort to support behavioural change.

Similarly, implicit to the Plan is the treatment of different modes and means of travel which, expressed as a hierarchy, would help build substance into the chapter's generally expressed policies such as "...the policies in this Plan and the Mayor's Transport Strategy aim to minimise this growth in travel and ensure it occurs in a sustainable way."

Examples of implicit commitments to a form of hierarchy include:

- The Mayor's commitment in paragraph 6.2 to "...improving the environment by encouraging more sustainable means..."
- Paragraph 6.6, "...reducing the need for the transport system to accommodate unnecessary travel demands..."
- Paragraph 6.12, "Travel by public transport needs to be improved to increase its appeal relative to the car."
- Policy 6.1 A, much of which relates to a sense of priorities and what is required to achieve change, for example:
 - a) 'Encouraging patterns of development that reduces the need to travel...'
 - b) 'Seeking to improve the capacity and accessibility of public transport...'
 - c) 'Supporting development that generates high levels of trips only at locations with high levels of public transport...'
 - g) 'Supporting measures that encourage shifts to more sustainable modes...'

A hierarchy of road users would also help support and direct policy, investment and action, and would assist communication with Londoners as part of stimulating debate about transport and gaining understanding and commitment to behaviour change.

c) Should maximum parking standards for residential parking be referred to?

No comment.

d) Should there be greater flexibility in accepting developments that could fund transport enhancements?

Developments should meet a range of criteria regardless of their potential contribution to transport improvements.

e) Is there sufficient recognition of the transport requirements for the Thames Gateway area?

The much promised 'sustainable regeneration' of the Thames Gateway zone presents the opportunity to adopt forms and patterns of development, including transport, which avoid duplicating the traffic-laden characteristics of much of the rest of London.

Notwithstanding the extensive space available in the zone, its sustainable regeneration will require development to avoid taking a form which is hungry for land by, for example, being dependent on extensive road and parking for housing, retail and commercial operations.

f) Should there be a pause in schemes requiring major expenditure after Crossrail to allow greater funding for affordable housing?

No comment.

g) Should the policy on further Thames crossings be clearer?

As stated above, consistent with the sustainable regeneration promised for the Thames Gateway, proposals for major connections across the river should support patterns of development which will obviate the characteristics of road traffic dependent development (i.e. air and noise pollution, extensive land use development demands).

The Thames Gateway Bridge inquiry did not support TfL's case for the regeneration effects of its proposed scheme. Clearly support for a similarly road-based crossing exists but it would be poor policy (and bad faith) to

simply bring forward new schemes which promise much but which are likely to replicate many of the original schemes failings especially its effects on pollution, traffic levels and failure to address local transport needs.

To complement Policy 6.4, B, k ('Providing new river crossings') the Plan should specify the criteria which any new crossing proposals, (mixed mode, public transport only or road only for instance) should meet so that the door is not left open to schemes which do not meet sustainable transport and land use needs.

Matter 6C

Policy 6.6 Aviation

- a) **Is the policy internally coherent given support for increased capacity in clause A and opposition to any increase of capacity at Heathrow in clause B without indicating how additional capacity could be provided in a more sustainable manner since Heathrow is proposed to have the best public transport links of any airport serving London with proposed Crossrail, Airtrack and HS2 services (direct or via Crossrail) in addition to current underground and Network Rail services?**

We note clause A's requirement that "Airport capacity serving the capital and wider south east of England must be sufficient to sustain London's competitive position" and paragraph 6.24 in which the Mayor recognises "...the need for additional runway capacity in the south-east of England".

The Commission's view is that the case for expansion of airports in the South East has not been made. Our 2002 research (Ref: RD325) and 2004 report (Ref: RD271), *The impacts of air transport on London*, examined the effects, benefits and costs of aviation and airports on London and recommended changes to aviation policy and the way policy is formed.

In summary we found that the benefits and disbenefits of flying are very unevenly distributed, only a third of flights are highly valuable to London's economy, if the price of aviation reflected external environmental costs and subsidies were removed growth demands would be reduced, and a significant proportion of flights from London and south east airports could be replaced by improved rail services.

Specifically we found that:

- Aviation is important to economic activity in London, especially tourism, but only a third of passenger air traffic is important to economic activity;
- Wealthy people fly much more than the poor and low-cost flights have not changed that. The propensity to fly is higher in 'well-off' boroughs than in poorer ones;
- Spending by London residents travelling overseas is broadly comparable to that of foreign residents visiting London. In the case of UK residents as a whole, spending overseas significantly outweighs that of foreign residents in the UK and this balance of payments deficit is growing;
- Heathrow can remain a major airport without an extra runway and without affecting competitiveness ambitions by establishing alternatives

to short and internal flights and directing use of existing capacity to long haul destinations where alternatives to flying are less viable;

- Government demand forecasts used to make the case for aviation growth tend not to consider factors such as the effect on demand if aviation operated without fuel tax and other subsidies. When such factors are applied traffic growth tends to be reduced to a point where the timescale for creating new capacity is extended and when applied to the greater south east no new capacity was required at least until 2030.

The Commission reiterates these findings. On this basis the role of aviation, while important, should not be generalised or overstated, especially given aviation's considerable and unresolved external costs and effects.

Clause A is a rather generalised statement. Our 2002 research examined the top destinations for London's airports and found many of these to be relatively short haul.

A determined policy to replace short haul aviation would not adversely affect London's connectivity to 'a wide range of destinations'; indeed, the likelihood is that the connectivity would be enhanced and choice extended.

In this sense the emphasis of clause A should be on supporting access and competitiveness by improving sustainable travel choices and ensuring that aviation focuses on unavoidable long haul destinations so that existing airport capacity is used for the right purpose.

- b) How does the policy need to be amended in the light of (i) new government policy as set out in the Coalition Agreement and the Parliamentary Statement on South East Airports by the Secretary of State on 15 June 2010 which includes an intended exploration of ways to improve efficiency and make the most of existing airport infrastructure; and (ii) the recognition of the key role of Heathrow in proposed changes put forward by the Mayor to paragraph 2.10 and Reference 12 of Annex 1.**

The starting point should be for the policy to avoid demanding more south east capacity. The Plan should also stimulate a thorough reappraisal and critical analysis of national and regional aviation policy as it relates to London.

The Mayor can use both the London Plan and the new government's position on south east airport expansion to develop clauses B, C and D and set out in more detail:

- what would constitute 'sustainable' operations and expansion;
- how extant problems should be addressed such that paragraph 6.25 ('...efforts to make aviation less environmentally harmful') is substantiated;

- the certainties required from aviation about the efficacy of measures aimed at addressing long standing environmental concerns; and,
- the certainties also required to address sustainable surface access to deal with existing airport-generated transport effects.

c) In the light of these statements and changes should the plan make comment on issues such as mixed mode operation, the Cranford agreement and Westerly preference and night time rotation and early morning runway alternation as matters that could be related to making the most of existing infrastructure while maintaining and enhancing environmental performance?

It would be consistent for the Mayor's stated concerns about long standing and growing noise and air quality effects of airport operations to be related to the current package of measures intended to ameliorate operational effects (alternation, agreements, night flights etc).

The Plan can then refer developers and boroughs and others to these as a baseline upon which any new measures and innovations can be assessed for their role in driving reduced pollution.

d) Should any increase in air transport movement ceilings be explicitly tied to securing the intended improved public transport accessibility through Airtrack and Crossrail and the achievement of EU Air Quality standards in the vicinity of the airport?

The Plan should set down the expectation that airport operators will improve sustainable transport access to their existing operations irrespective of ambitions to expand.

Heathrow is a major cause of pollution and congestion and transport improvements are required merely to deal with extant operations. Notably, at Terminal 5 inquiry, BAA plc publicised ambitious rail investment plans based on links across the wider south east and beyond. The plans were offered on the basis of gaining approval for T5 although the actual public transport improvements, while welcome, are less than what BAA presented at the time.

While we would expect any new planning applications to contain state-of-the-art transport commitments, the burden of proof is therefore on airport operators to prove that persistent transport, air quality and other environmental problems are being properly addressed without these being used to seek or justify further expansion.

The panel refers to air quality matters 'within the vicinity' of the airport. We advise caution when referring to proximity to Heathrow. Road transport demands and effects of Heathrow operations are extensive and not merely an immediate 'local' concern; air pollution hot spots exist in parts of London

because of the cumulative effect of many journey types including the contribution of Heathrow related-traffic.

- e) What bearing has the intended provision of HS2 and the precise form for the proposed High Speed route in terms of direct or indirect linkage via Crossrail and direct or indirect linkage to HS1 have on the hub role of Heathrow and capacity requirements to fulfil that role?**

In our 2002 research and 2004 report (see above) we advocated investment in rail links as a replacement for many of the shorter haul and internal flights at Heathrow. In our view this would enhance Heathrow's hub role and also be part of the commitment to address extant congestion and pollution concerns.

- f) Should there be explicit restraints on LCA and Biggin Hill or policies to encourage general aviation and increased use of these other airports in London?**

No - consistent with our view that airport growth in the south east is not justified and that reconsideration of overall aviation policy is required, given the considerable costs and disbenefits of aviation and airport operations, before new discussion is entered into about new development, whether piecemeal or substantive.

Should the plan be silent over the future of RAF Northolt?

Consistent with our view that airport growth in the south east is not justified and requires thorough reconsideration, Northolt should not be treated differently and should be mentioned.

- g) Should provision be made for heliports?**

No comment.