

**London Sustainable Development Commission (LSDC)**  
**Consultation submission on the Mayor's Draft Transport Strategy**  
**January 2010**

The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

The LSDC is grateful for the opportunity to comment on the draft Mayor's Transport Strategy (MTS). As a 'critical friend' to the GLA, the LSDC has an important role in promoting sustainable development in London and advising on the sustainable nature of London wide strategies.

The comments below on the MTS should be read in conjunction with those on the Economic Development Strategy and London Plan. (See attached responses)

This submission is part of this assistance. The LSDC welcomes the opportunity to engage in this process. We have already had a useful preliminary discussion with the strategy leads and look forward to further iterations of the strategy in the light of this and continuing consultations.

The LSDC welcomes and applauds the effective processes that the planning team have put in place for the development of this strategy. The detail and development of the strategy will lead to effective delivery and a more sustainable London. We recognise that developing a sustainable London with high quality lifestyles merits considerable attention.

Following the May consultation the Commission particularly welcomes the continued emphasis on transport not being an end in itself, the commitment to the Mayor's carbon reduction targets and improvements in air quality. The Commission also notes the commitments to transforming outer London's town centres to support, for example, low emission vehicles and cycling. Finally the LSDC welcomes the approach taken to Integrated Impact Assessment and notes the findings that the Strategy will contribute to the sustainability of London.

## **1. Introduction**

1.1 The LSDC is grateful for the opportunity to comment at this stage on the Proposals for the Mayor's Transport Strategy. Our comments concentrate on the following themes;

- Overall vision
- Governance, and effective delivery of the Strategy
- Measurement of effectiveness of the Strategy
- MTS policies to support sustainable economic development.

## 2. Vision

- 2.1 We support the vision that is set out in the Mayor's foreword and chapter one. We feel that, with the benefit of the case studies that are threaded through out the strategy, there are strong elements of delivery in this plan.
- 2.2 Despite this the role Transport for London (TfL) plays in supporting mayoral strategies is still underplayed particularly in supporting the energy, biodiversity, air quality and noise Strategies. For example, TfL's own **procurement** plans and relevant guidance and regulation can and should play a major part in providing the leadership that will be needed to improve air quality and cut carbon. This still does not come through as convincingly as it should.
- 2.3 The LSDC welcome the emphasis that the Strategy places in terms of providing a better quality of life and tackling climate change. We would hope that this work and indeed that of the whole strategy supports London in developing a low environmental footprint. We recommend that the transport strategy should be placed in a wider perspective - travel in London is not a goal in itself. Most often it is a means of communication between people who need to work together for instance. Because travel is not an end in itself, the overall objective of a transport strategy should be to explore different ways of facilitating interaction and meeting social, economic and environmental need. The strategy could set out a fresh approach to the value and meaning of **reducing the need to travel** by, for instance, incorporating that objective into land use development plans and by enabling imaginative use of technology.
- 2.4 As discussed the vision of reducing the need to travel within the concept of Transport for London's role in developing access rather than simply travel, within the Strategy is applauded. The strategy could benefit from a **more explicit expression of what life in 2031 could look like** and how this would support the Mayoral ambition of achieving the highest environmental standards and quality of life.
- 2.5 Aviation and Heathrow are mentioned in the Way to Go! **The impact of airport expansion** will need to be looked at closely particularly around the issue of whether growth in air travel will actually occur (allowing for the present recession and recent figures showing a decline in use of London's airports), in particular the impact that this will have on London's air quality, noise and carbon emissions. If expansion occurs the question of where it is best placed and whether environmental impacts can be managed or mitigated are all questions to be answered. The Commission's previous research into the impacts, benefits and beneficiaries of air travel remains relevant and can be found at:  
[http://www.londonsdc.org/documents/research/lfdc\\_airtransportimpacts.pdf](http://www.londonsdc.org/documents/research/lfdc_airtransportimpacts.pdf) This research found that London's economy is less reliant on air travel than previously thought and that Heathrow can remain a major airport without an extra runway

## 3. Governance

- 3.1 We agree that the MTS should be a more general high-level strategic document than previously. We support the flexible or fuzzy boundaries to the sub regions. However there is the issue of **how policies and measures are to be delivered at**

**a local level** through Local Implementation Plans, particularly as the London Plan will no longer be delivered at a sub regional level.

- 3.2 The Commission feels that the MTS should develop **policies for raising money for public transport improvements** through such mechanisms as S106 agreements – through land value taxation of properties and developments that benefit from increased property prices from new transport links (as currently being pursued for Cross rail).
- 3.3 Despite the commitments the Commission is still concerned to see how communities, particularly those in outer London, can be supported to choose the **low carbon option of public transport**. Figure 6 indicates very clearly that Londoners feel that their best option for convenient travel in outer London is often the car. It is not clear how the work with the Boroughs, or within the current business plan, is attempting to tackle this issue, particularly in the context of the likely emphasis on greater development in specific locations in outer London. It is important to have transparency on this issue, not least as it has a bearing on the delivery of several key strategies including those relating to air quality and carbon. How is responsibility to be shared? Who will be doing what?
- 3.4 We find the introduction of **case studies** in the document helpful in explaining how London can develop into a more sustainable city as a result of this strategy. The LSDC has used **'virtuous cycles'** to good effect in describing how policy can be delivered in practice addressing social, environmental and economic benefits e.g. our school travel plan case study from Camden<sup>1</sup> would be particularly useful. This case study demonstrates that working with a range of agencies can deliver effective diverse outcomes and with value for money. The LSDC would be delighted to support TfL to develop more case studies to support this vision.

#### **4. Outcomes and Measurement.**

- 4.1 We welcome the clarity, which is provided by figure 10. We recommend that the plan and overall operation of TfL would benefit from a clearer articulation of how TfL programmes will contribute to reductions in carbon emissions, improvements in air quality and reduction in road accidents
- 4.2 We applaud the emphasis that the document has in contrast to its predecessor on the climate change consequences of fossil fuel-based travel but feel more could be done. We acknowledge that this work is still in progress particularly in relation to the carbon emissions gap that the strategy identifies and the yet to be published climate change mitigation strategy.
- 4.3 We applaud the emphasis that the Mayor and EDS place on **electric vehicles**. It would be important however for TfL to model how this would effectively **reduce carbon emissions rather than displacing them to production of electricity**.
- 4.4 Many of the good work that TfL has in the realm of behaviour change appears to be underplayed in this draft. TfL have sensible policies on walking and cycling which will reduce CO<sub>2</sub> and the strategy does indeed emphasise the great importance of

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<sup>1</sup> [Hhttp://londonsdc.com/documents/research/LSDC\\_Virtuous\\_Cycles\\_Final\\_Report.pdf](http://londonsdc.com/documents/research/LSDC_Virtuous_Cycles_Final_Report.pdf)

this, as well as stressing that traffic reduction is imperative for London to meet its CO<sub>2</sub> targets. However these policies particularly outlined in paragraph 5.22 will not bite unless there is a comprehensive delivery using all the best behaviour change and social marketing techniques currently being deployed by Defra<sup>2</sup> and the DoH<sup>3</sup>. The Commission can provide positive examples of how more can be achieved. For example a green transport plan at BedZED eco-village<sup>4</sup> in south London included a range of targeted measures including public transport within ten minutes walk; incentives for bicycle use and storage for them inside dwellings; London's first car club; homes zones and reduced car parking and road space; a charge for car parking spaces and a car parking permit system. Three sets of monitoring data over six years indicate a 50-65% reduction in private car fossil fuel miles travelled compared to the local average. Just 17 per cent of residents travel to work by car, although the local average is 42 per cent. These figures compare very favourably with the results from the Smarter Travel Sutton project, which used door knocking rather than targeted measures.

4.5 The Commission are also particularly concerned at the measurement and improvement of **air quality** in London. Under the 1999 GLA Act and subsequent revisions, the Mayor is required to state how he intends to make provision to work towards the national air quality standards. It is still not clear how the MTS will mitigate the relevant impacts and how the various policies will contribute to improvements.

4.6 We would be interested to review the modelling that TfL may have conducted in relation to the boroughs; since the Mayor's Air Quality Strategy is unequivocal; ground based transport is the major contributor to air pollution in London. The Commission would wish to see a **clearer articulation of relevant air quality targets and how TfL intend to meet them**, and **how the TfL modelling demonstrates the effectiveness of the current policies**.

4.7 We applaud the work that TfL have conducted in relation to **road traffic accidents**. We find however that the information provided in the draft does not articulate a clear strategy on **how and where improvements will be made**. In particular we would seek a clearer relationship with planning policy such as chapter 6 (6.10 and 6.12) of the London Plan and the governments proposed vision zero of no accidents.

4.8 We would also question how the inequalities expressed (paragraphs 5.15.3) and emphasised in the IPPR 2002 report<sup>5</sup> in the draft strategy have influenced policy and how elements of the strategy are delivered. **How will TfL policies be targeted at those most vulnerable?**

## 5. MTS polices to support sustainable economic development.

5.1 The LSDC feel that the current economic conditions should be seen as providing the catalyst for real change and this includes **sustainable economic progress** that is consistent with living within our environmental limits. We consider that every single

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<sup>2</sup> Hhttp://www.defra.gov.uk/evidence/social/behaviour/H

<sup>3</sup> Hhttp://www.dh.gov.uk/en/Publichealth/Choosinghealth/DH\_066342H

<sup>4</sup> What Makes an Eco-Town? <http://www.cabe.org.uk/files/what-makes-an-eco-town.pdf>

<sup>5</sup> Hhttp://www.ippr.org.uk/pressreleases/archive.asp?id=654&fid=59H

bit of the economy – mobility, food, and the built environment is going to have to be re-gearred. We support the view that we are faced with a transformation of an order of magnitude that we have not seen before<sup>6</sup>. We would advocate an analysis of what is needed in the next twenty years to enable this dramatic transformation and that public funds be used to support virtuous cycles, where expenditure needs to ensure delivery against a range of sustainable outcomes.

5.2 For instance through the delivery of this strategy and subsequent transport plans, TfL is responsible for considerable **procurement** (see paragraph 2.2). Investment by TfL could accelerate the take up of sustainable technologies, could also support the development of innovative technologies in London and possibly attract internal investment - a fact that could be reflected in the EDS. TfL have also, for example, one of the largest bus fleets in the world. It would therefore be an exciting opportunity that would enhance London's standing in the world, if TfL would further invest in new technologies including, for example, hydrogen fuel cells.

5.3 We welcome a number of points in the plan including the emphasis on partnership and the aspirations at the outset. However if the strategy is properly to reflect the changing economy in response among other things, to the challenges of climate change and a low carbon future and factor in the social and environmental challenges that sustainability calls for, **a more radical approach** will be needed. We look forward to working with you to achieve this in the coming months.

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<sup>6</sup> [Hhttp://www.timesonline.co.uk/tol/news/environment/article6620438.ece](http://www.timesonline.co.uk/tol/news/environment/article6620438.ece) Sir David King