



**London Sustainable Development Commission
Consultation submission on the Mayor's
Transport Strategy (May 2009)**

Background to the LSDC and Policy Context

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.

In 2003, the Commission published *A Sustainable Development Framework for London*. This provides decision and policy makers with fourteen overarching objectives that they should seek to achieve with any strategy, policy or project they wish to progress. These objectives relate to the Commission's four areas of sustainable development:

- Taking **Responsibility** for the impact of one's actions on other people and the environment, and thinking longer term;
- Developing **Respect** for London's diverse communities and for London's environment;
- Managing **Resources** more prudently to reduce London's environmental impact and;
- Getting **Results**, which achieve social, economic, and environmental objectives simultaneously to improve the quality of life of Londoners now and in the future.

Sustainable Development in London

London cannot continue along its current path, where, (despite some significant successes) economic, social and environmental improvements are often viewed in isolation and are traded-off against one another. London must choose a more sustainable path, which will bring significant long-term benefits for both London and the wider world.

Sustainable development ensures we have a better of quality of life now and for the future whilst protecting and enhancing the earth's resources. Our vision for London articulates how this can be achieved and is contained in 'A Sustainable Development Framework for London'¹.

In practice, achieving a better quality of life is about:

- Having access to quality education, jobs, services, housing and leisure;
- Living in an environment which is healthy, resilient and stable now and into the future;
- Living and working within a society which is democratic, just, engaged, diverse, responsible, supportive and vibrant;
- Being fulfilled, healthy and with sufficient personal resources to enjoy life.

Whether as individuals, communities, businesses or governments, our journey towards sustainability means improving how we think about the social, economic and environmental impacts of everything we do. We must make the most out of available opportunities, designing out negative impacts and minimising them as a last resort.

Since The World Commission on Environment and Development first officially referred to sustainable development in 1987 in its report, '*Our Common Future*', known as the Brundtland Report, sustainability has been conventionally divided into social, environmental and economic spheres. Whilst this definition may be useful in looking back it fails to identify the opportunities for integrated solutions in the future.

The Commission's approach to Sustainable Development

To understand how to get to grips with sustainability the Commission promotes an integrated approach in preference to the more traditional 3 pillars way of thinking.

This approach sees policy makers and Londoners alike taking **Responsibility** for how their actions impact on other people and the environment, adopting an attitude which **Respects** London's diverse populations and environment, and considering ways in which to manage the earth's **Resources** more prudently thereby achieving positive **Results**.

We see this integrated approach in terms of a '**virtuous cycle**', where it makes more sense if opportunities and impacts, across these four "Rs", are considered together and the benefits become mutually self-reinforcing.

For example, a well designed policy which aims to increase walking and cycling will not only see an increase in **Responsibility** of Londoners for their actions but should also lead to increased **Respect** by targeting all communities in London. The policy would reduce consumption of the earth's **Resources** such as finite fossil fuels thereby delivering broader positive **Results**. These results would include reducing congestion as well as improving health (and reducing health inequalities) through the increase in daily physical exercise.

**London Sustainable Development Commission (LSDC)
Consultation submission on the
Mayor's Transport Strategy
Statement of intent May 2009**

One of the ways the LSDC assists the Mayor to set priorities for improving London's sustainability is to provide comment to the GLA family in relation to corporate and investment plans.

This submission is part of this assistance. We have used the above sustainability frameworks to inform our thinking. The LSDC welcomes the opportunity to engage in this process. We have already had a useful preliminary discussion 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 the Statement of Intent. We recognise that developing a sustainable London with high quality lifestyles merits considerable attention. To this end, the LSDC will be engaging in a range of seminars and thought pieces over the next few months, which will principally effect the discussions concerning the economy and investment decisions. It is hoped that the product of this work would further develop the Mayor's vision of a London that excels among global cities.

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;

1.1.1. Overall vision

1.1.2. Governance, and effective delivery of the Strategy

1.1.3. Measurement of effectiveness of the Strategy

1.1.4. The London Plan's influence on the MTS policies to support economic growth.

2. Vision

2.1. We support the vision that is set out in the Mayor's foreword and chapter one. However, the role Transport for London plays in supporting mayoral strategies is 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 does not come through as convincingly as it should.

- 2.2. 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.
- 2.3. The concept of reducing the need to travel and describing Transport for London's role in developing access, within 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.
- 2.4. Aviation and Heathrow are mentioned in the Way to Go! document and we understand a review of aviation is expected early next year. 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). If expansion occurs the question of where it is best placed to occur 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

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 Crossrail).

3.3 We are particularly 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?

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 and improvements in air quality.

4.2. There is insufficient emphasis in the document on the climate change consequences of fossil fuel-based travel. Many of the sensible policies on walking and bicycling will reduce CO₂ and the strategy should emphasise the great importance of this, as well as stressing that traffic reduction is imperative for London to meet its CO₂ targets. The transport policy must reflect the overriding need to meet our CO₂ targets.

4.3. From the Climate Change Action Plan, we know that ground based transport contributes to 22% of the carbon emissions in London, the climate change action plan identified that car and motorcycle use contributes to nearly 50% of this. It is important that we know the contribution that TfL can make to the overall reduction of 60% by 2025.

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

5. The London Plan's influence on the MTS policies to support economic growth.

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.

- 5.2. We consider that every single 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 before¹. We would advocate that public funds be used to support virtuous cycles, where expenditure needs to ensure delivery against a range of themes.
- 5.3. For instance through the delivery of this strategy and subsequent transport plans, TfL is responsible for considerable procurement. 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.
- 5.4. TfL have also for instance 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.
- 5.5. 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.

¹ <http://www.timesonline.co.uk/tol/news/environment/article6620438.ece> Sir David King