



**Draft Mayor's Transport Strategy:
Joint response from 17
Central London BIDs**

London Bridge
Waterloo
Victoria
Marble Arch
Baker Street
Heart of London
Paddington
Hatton Garden
MidTown

Northbank
South Bank
Better Bankside
Fitzrovia
New West End Company
Farringdon & Clerkenwell
Vauxhall
Angel

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Introduction

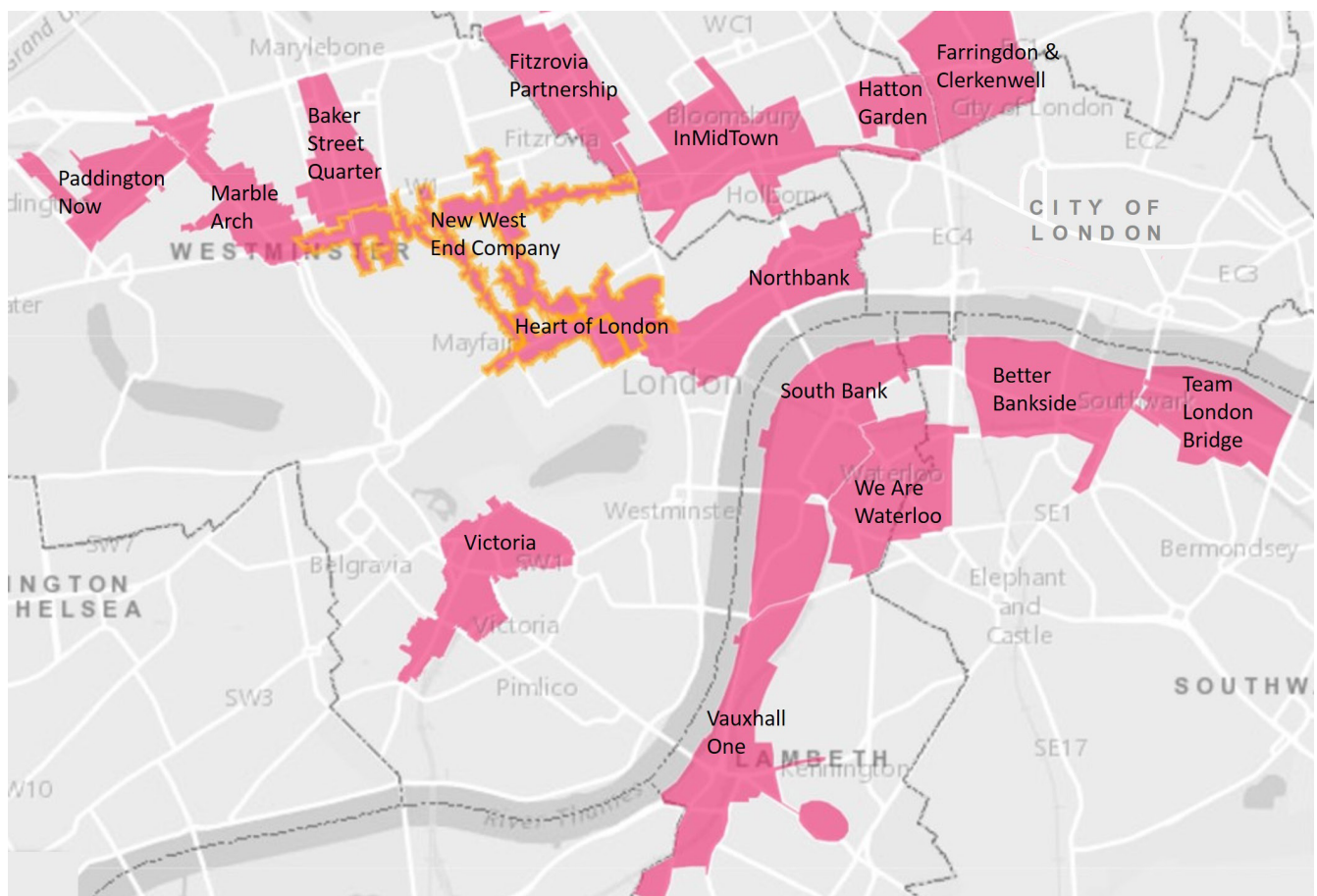
This document presents a unified response by 17 Central London Business Improvement Districts to the Mayor of London's draft Transport Strategy. The BIDs in question are as follows (listed in no particular order):

- London Bridge
- Waterloo
- Victoria
- Marble Arch
- Baker Street
- Heart of London
- Paddington
- Hatton Garden
- MidTown
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Collectively, the 17 BIDs represent around 5,600 businesses covering a range of commercial sectors, and the areas they cover are shown on the plan below. As we have shown through our previous work with TfL, our common aspirations for improving the business environment include enhancing the public realm and addressing issues of air quality and traffic domination; goals synonymous with many of the Mayor's aims.

This joint response has been endorsed by each BID named with the purpose of adding weight and clarity to the views expressed on the key issues covered. It should be read in addition to, not as a replacement for, any responses to the draft MTS that individual BIDS may make.

The response follows discussion of the draft MTS at two events. The first was the presentation by TfL and related round-table discussions at a meeting hosted by the Marble Arch BID on 4th September. The second was a workshop on 14th September hosted by Team London Bridge.



Chapter Two - Consultation Question 2

To enable a focus on the matters that are most important to the BIDs, comments are concise and set out under headings that relate to the relevant consultation questions asked by the draft MTS. (Not all of the 24 questions are answered.) As appropriate, reference is also made to specific draft policies and proposals.

Overall, the BIDs are strongly supportive of the Mayor's transport vision, including the emphases on reducing motor traffic, on enabling more people to walk and cycle more, on tackling poor air quality, and on the 'Healthy Streets' approach.

Accordingly, where the detailed responses that follow call for changes to the draft MTS, these calls are chiefly for one of three things:

- further detail/clarity;
- greater ambition;
- direct involvement of the BIDs in developing key initiatives.

The Mayor's vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80 per cent of Londoners' trips will be made on foot, by cycle or using public transport.

To what extent do you support or oppose this proposed vision and its central aim?

We strongly support the Mayor's overall vision and the 'Healthy Streets' approach that puts human health and experience at the heart of planning the city. We know that a good public realm experience is good for business.

We support the Mayor's focus on reducing road danger, improving air quality and increasing active travel. We agree that the future of central London must involve a steady reduction in the use of private cars (however fuelled or autonomous), and therefore that walking, cycling and public transport use must continue to increase. We also support the principles of 'good growth'.

We are especially concerned about the urgent need for action on air quality, road safety and congestion in central London. Therefore, while supportive of the central aim as far as it applies to the whole of London in 2041, we consider that:

- (a) a higher target than 80% should be set for central London;
- (b) there should be interim targets by date (steps towards the 2041 figure) for central, inner and outer London, including one at the end of the current Mayoralty (2020); and
- (c) there should also be target reductions for vehicles carrying goods and services.

We would therefore like to see a timeline for target reductions in motor vehicle traffic in central/inner/outer London between now and 2041, alongside a timeline for the key programmes/measures that will help achieve these reductions (similar to the emissions timeline, Figure 12 on pages 94-95.)

Chapter Two - Consultation Question 3

To support this vision, the strategy proposes to pursue (numerous specific) aims.

To what extent do you agree or disagree with the aims set out in this chapter?

We are generally supportive of the strategy proposed in support of the vision, but wish to see greater ambition in respect of some of the specific aims.

Concerning emissions from buses, we consider that the target for all buses to be zero emission by 2037 is not nearly ambitious enough. The Mayor has significant powers and direct influence in this area, and we note that his predecessor oversaw the design and introduction of a completely new bus within his first term. Therefore, we call on the Mayor to set far more challenging targets for zero emission buses, building on existing proposals for Low Emissions Bus Zones. In short, we want to see all buses in London being zero emission well before 2037, and much sooner than that in central London.

We also wish to see clearer and accelerated targets for zero emission taxis and private hire vehicles, along with targets for coaches, and clearer rules and better enforcement on idling.

We support the aim for eliminating deaths and serious injuries from all road collisions, but we would like to see an earlier date set than 2030 for achieving the target for no-one to be killed in, or by, a London bus.

We strongly support the aim of reducing traffic volumes London-wide by about 6m vehicle km per day by 2041, but would again like to see steps towards this target for central/inner/outer London.

We request direct involvement in the development of proposals to reduce freight traffic at peak times. Specifically, we urge the Mayor to take the lead in developing a strategic, London-wide approach to freight consolidation. See also our response to consultation questions 7 and 8.

Chapter Three - Consultation Question 4

Policy 1 and proposals 1-8 set out the Mayor's draft plans for improving walking and cycling environments (see pages 46 to 58).

To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.

We are strongly supportive of the Healthy Streets approach and the policy emphasis on enabling more walking and cycling. In central London especially, this is vital in terms of space use, air quality and the overall user experience.

On Proposal 1, we would like to see an additional bullet point emphasising the need for context-sensitive design and the importance of the visual amenity of the streetscape.

On Proposal 2, we strongly support the aim of transforming the experience of the walking and cycling environment in central London by reducing the dominance of vehicular traffic. However, what the ongoing experience with proposals for Oxford Street shows is the importance of taking sufficient time to engage fully with stakeholders and to develop a more holistic, long-term plan for central London, to avoid unforeseen and undesirable knock-on effects in adjacent areas. Just as Camden's West End Project has placed some constraints on developing the Oxford Street project, so might Oxford Street limit future options for transforming other key streets and spaces, like Parliament Square, Regent Street and Strand.

We request continued direct involvement in developing the Oxford Street scheme, and other transformational schemes in due course.

Associated with this, we note, in connection with all Proposals 1-8, the statement that change will be achieved through the agency of both TfL and the boroughs. Differences in policy or approach between boroughs, and real or perceived differences in pros and cons, can make major schemes and area-wide initiatives very hard to implement. We urge the Mayor to play a leading role in enabling resolution of any differences between boroughs affecting the implementation of key proposals in central London.

Specifically, we consider that there is a need for a more comprehensive review of central London's bus, taxi, traffic, and cycle networks than has so far been undertaken in connection with Oxford Street and other workstreams.

On Proposal 6, we support development of the role of cycle hire as an integral part of London's cycling infrastructure, while noting caution about the potential adverse impacts of the dockless bike share model on conditions for walking and the visual amenity of the public realm. We welcome TfL's recent publication of its Dockless Bike Share Code of Practice, and would like to see it kept under review in the light of emerging experience.

Related to this, we consider that the MTS should present proposals for how the Major and local authorities can obtain public value from the use of the public realm by private enterprises (e.g. oBike, Mobike, Uber) to make profit.

On Proposal 7, we urge the Mayor proactively to support the boroughs in bringing forward more 'School Streets' schemes. These will promote more walking and cycling to and from schools, and reduce the peak period congestion and air pollution associated with car-borne school trips.

As a general point, we are concerned that some major schemes that TfL is currently consulting on are not consistent with the Healthy Streets approach. We therefore call for a final Healthy Streets Check tool to be published by TfL and in use by TfL and boroughs as soon as possible (by the end of 2017 at the very latest).

We would also like a simplified version of the Healthy Street Check tool to be made available to organisations like BIDs. This would enable us to audit the existing quality of streets in our areas and use this information to make the case for change and appropriate investment.

We would like to see targets for increased walking in central London, and we also request the Mayor to clarify how much he intends to spend on enabling more walking. We recognise that improving walking conditions is often integral to multi-modal and other complex projects, and we also note that the draft MTS contains no information on budgets for any mode. However, mode-specific budgets (including for cycling) have previously been produced by TfL, and we are concerned that the absence of a figure for walking can be read as a lack of practical commitment to making London appreciably more walkable.

Chapter Three - Consultation Question 6

Policy 3 and proposals 12-14 set out the Mayor's draft plans to ensure that crime and the fear of crime remain low on London's streets and transport system (see pages 68 to 69).

To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London's streets and transport system? Please also describe any other measures you think should be included.

We are strongly supportive of the Mayor's policy to work to keep crime and the fear of crime low on London's streets and transport system. We are keen to work with the Mayor, TfL and boroughs to improve personal security for all people living in, working in and visiting central London. In connection with this, we would like to see improved communications across all security providers, to enable better joined-up thinking about physical and other measures. We also call for the pros and cons of different crime and security initiatives to be assessed in the context of their impact on other MTS policies, such as Proposal 1 for the creation of a high quality public realm that creates attractive, safe and accessible conditions for walking and cycling.

Chapter Three - Consultation Questions 7+8

Q7. Policy 4 and proposals 15-17 set out the Mayor's draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).

To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets? Please also describe any other measures you think should be included.

Q8. Proposals 18 and 19 set out the Mayor's proposed approach to road user charging (see pages 81 to 83).

To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.

We consider these two consultation questions together as both concern how best to manage a scarce resource - street space - which is under particular pressure in central London.

We strongly support the policy to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, although it begs the question of what traffic is 'essential'.

In this regard, we are pleased to see the Mayor's commitment in Proposal 15 to work with business and the freight industry to improve the efficiency and safety of freight and servicing; and we look forward to being fully involved in this engagement. We are especially supportive of Proposal 15(b) to undertake planning to achieve a strategic freight consolidation and distribution network. We know that a London-wide approach will be essential in achieving the desired outcomes in terms of vehicle reductions and improved air quality and safety.

On Proposal 15(e), we consider that this needs to be substantially reworded. We agree that the traffic generated by personal deliveries is a growing concern, but encouraging individual businesses in central London to ban this activity is not a solution.

As we also say in relation to questions 13 and 18, staff recruitment and retention for businesses in central London is already affected by the distances staff have to travel, the cost of that travel, and the time it takes. Personal deliveries to work, rather than home, are therefore highly valued, and a ban would be very unpopular.

Accordingly, in place of what would in any case be a voluntary and hence ineffective ban, we call on the Mayor and TfL to use their assets, and to work with boroughs, local businesses and delivery service providers, to develop a network of neighbourhood 'click-and-collect/return' hubs. These hubs would be within a short walk of every central London business - so convenient for staff; and would be used by all service providers - yielding benefits to them by greatly reducing the number of addresses to visit and ensuring space to park delivery vehicles easily and legally.

We also urge the Mayor, TfL and boroughs to use their powers and assets, to increase the number of collection and drop-off points across the city, nearer to more homes: such as in train, tube and bus stations; local shops and businesses with long opening hours; and other secure locations.

On Proposal 15(f), we will be pleased to work with TfL and the boroughs to promote waste and recycling consolidation. While acknowledging that property owners/occupiers should take more of a lead on dealing with waste, we consider that the boroughs also have a responsibility to ensure that developers/land owners/occupiers comply with the requirements of all waste management strategies agreed as planning conditions.

We consider Proposals 18 and 19 to be too vague and the timescales implied to be too long ('keep under review'; 'give consideration to').

Concerning the future of road user charging, we call on the Mayor to work proactively with us and other stakeholders to explore the practicalities, pros and cons of developing a much smarter system than the current C-Charge. Such a system would enable differential charges for different types of traffic (e.g. for deliveries, construction, residents) and for different time periods.

This workstream, which should also consider the practicalities, pros and cons of a workplace parking levy scheme, should begin as soon as possible.

Chapter Three - Consultation Question 10

Policies 5 and 6 and proposals 22-40 set out the Mayor's draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).

To what extent do you agree or disagree that these plans would help London become a zero carbon city? Please also describe any other measures you think should be included.

We strongly support the Mayor's ambition to make London's transport network zero carbon by 2050. However, we call for some actions towards this target to be accelerated, and others to be clarified.

On Policy 5, we would like to see an additional proposal specifically to deal with enforcement against the worst-polluting vehicles; and for the Mayor to work with TfL and the boroughs to review and enforce legal provisions to reduce idling by all vehicles, including taxis and PHVs.

On Proposal 22, while supportive of the introduction of a central London Ultra Low Emission Zone in 2019, we are concerned about potential boundary issues that might raise objections from our inner London neighbours. Greater clarity concerning the practical effect of the timeline shown in Figure 11 would be helpful.

On Proposal 27, we have already noted, in response to consultation question 3, that we want to see all buses in London being zero emission well before 2037, and much sooner than that in central London.

On Proposals 28 and 29, we request greater clarity concerning the practical effect on air quality of the taxi and private hire fleets becoming Zero Emissions Capable. There would appear to be an important difference between ZEC and simple ZE. In central London especially, we want the taxi and PHV fleets to be zero emission in practice as soon as possible.

Concerning timescales, we also request greater clarity on when all taxis/PHVs in service will be ZE(C) and would like to see a separate 'Cleaning the Taxi/PHV Fleet' timeline, similar to the Figure 13 timeline for buses.

On Policy 6 generally, we consider that it would be helpful for the MTS to make explicit that, although there will be local air quality benefits from increasing the proportion of Ultra Low and Zero emission vehicles, there remains a pressing need to reduce the overall number of vehicles on the city's streets. Additionally, we would like to see recognition of some potential unintended consequences of ZE/ULEVs, such as the increase in street clutter and the use of charging bays for free parking, together with remedial actions proposed.

Chapter Three - Consultation Question 11

Policies 7 and 8 and proposals 41-47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).

To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

We are strongly supportive of Policy 7, to ensure that transport schemes in London protect existing and provide new green infrastructure wherever practicable.

However, we are concerned that the provision of new street trees and the delivery of sustainable urban drainage are excluded from street improvement schemes, principally on the grounds of cost. We are also concerned that borough planning policy is generally not robust enough to prevent soft landscaping (e.g. front gardens) being paved with impermeable surfaces.

We therefore call upon the Mayor to work with TfL and the boroughs to review and, as necessary, expand the targets established in Proposals 41 and 42, and to adopt an agreed monitoring regime to ensure targets are met year-on-year.

It would be helpful and beneficial for links between relevant MTS policies/proposals and both the London Sustainable Drainage Action Plan and the London Environment Strategy to be made more explicit.

Chapter Four - Consultation Question 12

Policy 9 and proposal 48 set out the Mayor's draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling (see pages 118 to 119).

To what extent do you agree or disagree that these plans would provide an attractive whole journey experience? Please also describe any other measures you think should be included.

We strongly support Policy 9 and Proposal 48, but urge the Mayor to ensure that TfL and the boroughs place a greater priority on creating high quality gateway spaces at all stations and public transport interchanges, not just the higher-profile hubs and termini.

We recognise that retail units will often be a beneficial part of such change, but are concerned that, in some locations (e.g. Baker Street), the current condition of the public realm and associated patterns of subletting to other commercial uses do not present an inviting gateway experience to the wider area. This can have adverse impacts on legibility, and hence the attractiveness of walking, and also on perceptions of an area as a place for business.

Chapter Four - Consultation Questions 13+14

Q13. Policies 10 and 11 and proposals 49 and 50 set out the Mayor's draft plans to ensure public transport is affordable and to improve customer service (see pages 121 to 125).

To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport? Please also describe any other measures you think should be included.

Q14. Policy 12 and proposals 51 and 52 set out the Mayor's draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan (see pages 127 to 129).

To what extent do you agree or disagree that these plans would improve accessibility of the transport system? Please also describe any other measures you think should be included.

We are strongly supportive of making the public transport network more affordable, accessible and pleasant for all Londoners. This is especially important for people who work in central London, many of whom cannot afford to live near their workplace and many of whom also need to travel at unsociable hours.

The affordability of transport is a particular concern of central London businesses in terms of attracting and retaining staff. We therefore welcome the Hopper fare introduced in 2016 and also welcome the extension of this initiative such that, by the end of 2018, people will be able to make unlimited bus or tram transfers within the hour. See also our concerns about the affordability of housing in response to question 18.

Going forward, we call on the Mayor to initiate a major rethink about London's transport is funded, so that travel into central London by public transport can be made increasingly affordable. See our response to question 22.

Chapter Four - Consultation Question 17

Policies 15 to 18 and proposals 68 to 74 set out the Mayor's draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully inclusive and well-connected public transport system. The Mayor's policy to support the growing night-time economy is also set out in this section (see pages 176 to 187).

To what extent do you agree or disagree that these plans would deliver a well-connected public transport system? Please also describe any other measures you think should be included.

We strongly support Policy 15 to exploit the full potential of the Thames to carry passengers, to integrate river services with the public transport system, walking and cycling networks, and to enable the transfer of freight from road to river.

On Proposal 72, we strongly support the delivery of replacement facilities for Victoria Coach Station. We would also like to be engaged in the process of determining the provision of adequate on-street and off-street coach infrastructure in appropriate locations across London for commuter and tourist coach services. As part of this process, we will urge the Mayor to work with TfL and the boroughs to ensure robust enforcement of coach parking in inappropriate locations.

We are supportive of Policy 17 to develop public transport services to support the growth of the night-time economy.

On Proposal 73, we support the Mayor in seeking powers to limit the overall number of PHVs licensed for use in London so as to manage their contribution to congestion in central London.

Chapter Five - Consultation Question 18

Policy 19 and proposals 75 to 77 set out the Mayor's draft plans to ensure that new homes and jobs are delivered in line with the transport principles of 'good growth' (see pages 193 to 200).

To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

We strongly support Policy 19 to deliver new homes and jobs in line with the transport principles of 'good growth'.

However, on Proposal 75, while we recognise the benefits of densifying development, and the role of transport in enabling this, we are particularly concerned about the affordability of housing for people who live and work in central London. This is a key issue for central London businesses in terms of attracting and retaining staff.

We note, and support, the Mayor's proposal to use surplus TfL land to maximise affordable housing (Proposal 91). However, we would like to see more on this key topic. The affordability of housing and of transport are inextricably linked, especially for people working in central London; and we call for this link to be made more explicit in the MTS, either through inclusion of a specific new proposal or clear reference to other Mayoral policies and proposals.

Chapter Six - Consultation Question 21

Policy 21 and proposals 97 to 101 set out the Mayor's proposed approach to responding to changing technology, including new transport services, such as connected and autonomous vehicles (see pages 258 to 262).

To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

We strongly support Policy 19 to manage all new transport services in London so that they support the Healthy Streets approach; embracing as it does the delivery of better infrastructure for walking and cycling, more affordable public transport, and measures to discourage unnecessary travel by motor vehicles. This approach is vital for the future success of the full range of central London's businesses and will increase their economic output and value.

We recognise the importance of ensuring that new transport technologies and services are harnessed for the benefit of the city, not merely to suppliers; and we therefore support the use of the Healthy Streets approach as the litmus test of the value of new transport options to London.

As a general point, we urge the Mayor and TfL not to rely on or wait for possible future technology to achieve necessary change that can be delivered through existing means in the shorter term.

Chapter Six - Consultation Question 22

Policy 22 and proposal 102 set out the Mayor's proposed approach to ensuring that London's transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).

To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

We support Policy 22, to seek to ensure that London's transport system is adequately and fairly funded, including the devolution to the Mayor, GLA or TfL of additional powers, as necessary to enable the Mayor and his agencies to respond effectively to economic, social and environmental change.

We consider that there are new opportunities, as well as current and emerging challenges, concerning how London's transport is funded going forward, and we urge the Mayor to explore these new opportunities very closely. In addition to possible revenues from a smarter and fairer road user charging system, and from a workplace parking levy, new sources of funding for transport improvements could arise from partnership with private sector service and technology providers.

We also urge the Mayor to use the Healthy Streets approach to make the case to Government for transport funding from Public Health budgets. We consider that there is already sufficient evidence to demonstrate that enabling more active travel has huge potential to reduce the burden on the National Health Service; and to save public health spending overall through a greater focus on the prevention of a range of diseases and other conditions.