

London Borough of Bromley

Response to consultation on the London Mayor's Transport Strategy, January 2010

Introduction

1. The Council welcomes the publication of the Mayor's Transport Strategy, in particular the adoption of a less prescriptive approach and the increased emphasis on allowing boroughs to develop local solutions to help achieve the Strategy's goals. We look forward to a positive working relationship based on shared objectives.
2. Where possible, this response attempts to follow the themes in the "Stakeholders' Questions" section at page 349 of the draft MTS.

Vision

3. The Council supports much of the Mayor's transport vision in general terms.
4. We note that the forecast levels of growth in population and employment, derived from the draft London Plan, are not regarded as a matter of choice, are not targets, but rather are seen as being a matter of prudent planning. The Council's response to the draft London Plan has highlighted our concern about the implications for Bromley of growth in respect of housing and congestion. We remain unconvinced as to the reliability of these figures, which in turn raises profound questions about the assumptions drawn from them.
5. We are concerned that, against this background of growth, the Mayor's goal to "improve transport opportunities for all Londoners" may not be met in full by the proposals in the MTS. Rather, the indications in the MTS are that transport networks, despite substantial investment, will struggle to keep up with the challenges posed by growth.
6. The core forecast in the MTS and the London Plan is that there will be between 3M and 4M extra trips per day in about twenty years' time. The MTS shows the mode share for car trips reducing from 43% in 2006 to 37% in 2031, assuming no road user charging (*P35 fig 10*). Depending on exactly how many more trips there will be, this forecast of modal shift implies that the number of car trips will stay the same as at present, or slightly reduce, in a London which has expanded by 1.3M people and 0.8M jobs in 2031.
7. Elsewhere, the draft says that between 3.4 and 4.5 million extra trips each day will need to be made by public transport, walking and cycling to support the growth envisaged in the London Plan – again implying that the number of car trips is actually intended to reduce (*P86 para 159*).
8. We welcome the Mayor's intention to make it a particular priority to improve the quality of Londoners' overall daily travel experiences (*P88 para 167*). However, the diagrams of tube, DLR and rail crowding (*figs 19, 20, 21 & 22*) show that levels of crowding on public transport in 2031, in general, are likely to be just as

bad as they are now, despite a planned increase of over 30% in public transport capacity (*P70 para 130*).

9. Our conclusion from these figures is that it would be unwise to rely on the reduced levels of car use suggested by the MTS. While some journeys may be improved, many will not and others may get worse. The message for many Londoners is that both road congestion and public transport overcrowding in 2031 will be much the same as they are in 2010.

Outer London

10. The Council welcomed early proposals by the Mayor to develop a “polycentric” approach to growth, with the potential benefits that approach could bring to outer London (including potentially shorter journeys). However, we opposed the development of a small number of larger centres (originally known as “super hubs”) as an approach to this. We therefore welcome the renewed prominence given to the role of Metropolitan town centres, and the Strategy’s support for a range of transport improvements in Metropolitan town centres (*P81 Policy 8*). However, we have considerable concern that this prominence is tempered by a continuing focus on Croydon, Brent Cross and Heathrow, which appear to retain a higher place in the transport hierarchy.

Transport Proposals

Managing and enhancing the transport system

Orbital movement

11. We note that Bromley town centre is shown as requiring enhanced links for improved orbital connectivity, particularly to and from Croydon and also inward links towards Bromley Town Centre from the NW and SE (*P19 also p 79 Fig 24 & Policy 7*).
12. While the Strategy seeks to improve orbital road links (*P78 para 138*), we are disappointed that the Strategy mainly restricts itself to the improvement of transport links in outer London through a “hub and spoke” approach (*P29 para 12*).
13. While we support the development of improved linkages into Metropolitan centres like Bromley, and our London Plan response has welcomed the “hub and spoke” concept in general terms, we believe that the idea that the deficiencies in provision for orbital movement will be fully addressed by somehow joining-up the “spokes” leaves too much to chance. In particular, we remain concerned that those outer London centres (Croydon, Brent Cross and Heathrow) identified as having very large planned increases in employment and housing (*P60 para 107*) will have priority for transport improvements, to the economic and social detriment of the other Metropolitan centres.
14. We note that the Strategy appears to exclude the provision of a high speed orbital public transport system, and are concerned more generally that the Strategy implies a limited priority for orbital public transport improvements, because “the relatively low demand for orbital public transport in outer London means that most value for money will be obtained by focusing on better journey

planning information and improved interchange, particularly at strategic interchanges” (*P80 para 139*). We continue to challenge this assertion.

15. While orbital connectivity by public transport in parts of outer London remains poor, it will be important to recognise that there will be a demand for access by car to facilities which are not sufficiently well served by public transport. An example of this in Bromley is the Princess Royal University Hospital (PRUH) at Locksbottom, where there is a need for additional parking to be provided either on, or adjacent to, the hospital site, for example by providing an additional deck above existing surface level car parks.

Car Use

16. We welcome the Strategy’s recognition that the car is the dominant mode for trips originating in Outer London. However, we note that that the Strategy says that cars used for trips in outer London “should” be fuel efficient, with low emission (*P33 para 36, also P107 para 236 -237*). While sympathising with the objective, we have some difficulty in understanding how this change might be brought about in outer London, independently of any national (or international) changes to vehicle design standards, other than through publicity and persuasion. We would strongly oppose any suggestion that might result in a blanket Low Emission Zone type of restriction on private cars in outer London.
17. There is a suggestion that, where possible, car access should be restricted in residential neighbourhoods in order to reduce speeds and create pleasant and safe spaces for cyclists (para 468). This appears to suggest that residents’ and residents’ visitors’ cars should somehow be restricted in their own local streets in order to promote cycling. This is significantly different in concept from conventional locally-determined schemes which seek to make residential areas more pleasant and liveable by deterring through traffic, reducing speeds and promoting safety. If individual local authorities wish to pursue more restrictive proposals with local consent, that remains a matter for them. We believe it would be several steps too far to promote this as part of the MTS.

Rail

18. We welcome the Strategy’s support for improved rail connectivity in south-east London, although we note that even after the implementation of committed rail enhancements, the MTS forecasts that the Bromley corridor will be “moderately stressed” in 2017 and “highly stressed” in 2031 (*P119 para 270 Fig 32*).
19. In outer London, rail plays a role in catering for relatively short local journeys within boroughs, as well as for longer-distance travel. We believe the Strategy should explicitly recognise this function, since meeting these local needs may conflict with potential services changes aimed at improving commuter services or other longer-distance journeys.
20. We note the Strategy’s full support for Crossrail to be delivered by 2017 (*P112-115 paras 259-263, Proposal 5*). However, in the Council’s response to the draft London Plan, we have expressed concern that the financial burden of supporting Crossrail through planning obligations may fall disproportionately on boroughs

like Bromley where the least direct benefit will be felt. This is totally unacceptable.

21. We welcome the designation of Bromley South station as a Priority Strategic Interchange (*p171 Fig 44*) and the Mayor' commitment to assign a high priority to delivering capacity enhancements at the most congested stations, including Bromley South (*P125 proposal 11*).
22. In our response to the Statement of Intent (SOI), the Council specifically sought improved rail and DLR capacity to central London and Docklands from the east of the borough. In our view it remains critical that high priority be afforded to the early extension of the DLR (in whatever form) from Lewisham to Bromley Town Centre to alleviate the stress recognised at Point 18.
23. A diagram of enhancements to London's transport infrastructure (*Figure 3*) shows an arrow from central London to Bromley as a radial improvement. A note on the diagram says "Rail/Tube improved capacity and connectivity to southeast London, including potential Bakerloo Line extension". Elsewhere, the Strategy states that a longer-term Bakerloo Line southern extension could serve inner & outer SE London (*para 320 & Proposal 22*), and that investigations of further DLR capacity post-2020 will include "south of Lewisham" (*Proposal 15*).
24. While many of these enhancements will undoubtedly be some way off, they are too vague to offer Bromley anything other than a minimal degree of comfort. We seek a more direct commitment to Bromley's needs in the final MTS.
25. Our response to the SOI also sought improved capacity on the Hayes Line. TfL officials have indicated that, as part of the possible southern extension of the Bakerloo Line, they are actively investigating extending the Bakerloo Line to incorporate the Hayes Line, with a possible spur to Bromley North.
26. Whilst Bromley remains broadly supportive of this proposal in principle, we would need complete reassurance that the Hayes Line's current connectivity to Charing Cross, Cannon Street, Waterloo East and London Bridge would in no way be lost by such a proposal, prior to committing our full support. In the light of this, the Council seeks a more definite commitment in respect of the Hayes line in the published MTS.
27. Our response to the SOI also sought improved links to international rail connections at Ebbsfleet. This is not included in the draft MTS, and we seek reference to the need for this in the published MTS.
28. Mindful that this suggestion has been previously considered at a national level, we would nevertheless encourage the Mayor to review any possibility which might exist regarding 'double decker' train technology, where the infrastructure can support it.

Tramlink and the DLR

29. The Council's response to the Statement of Intent called for consideration of appropriate intermediate modes, including express buses, busways, the

extension of the DLR and the extension of Tramlink (to Bromley town in Bromley's case).

30. We note with considerable concern that consideration of further extensions to Tramlink will give a "strong focus" to a north-south axis to accommodate Croydon's growth needs and "potentially" to improve east-west links to neighbouring outer London town centres to support improved orbital connectivity (*P129 para 292*). Previous positive indications about the business case for a Tramlink extension to Bromley town did not suggest that north-south extensions in Croydon had a higher priority. Neither does the London Plan seem to offer the same emphasis as the MTS. We seek a more positive commitment to prioritising a Tramlink extension to Bromley post-2020.
31. As mentioned in the section on Rail, we note that investigations of further DLR capacity will include "south of Lewisham". However, the draft Strategy makes no mention of the under-used capacity on the present rail link to Bromley North, and we seek a recognition of this in the published Strategy.

Buses

32. We suggested in our response to the Statement of Intent that there was a need for a fundamental review of bus routes across London. Proposal 23 of the Draft Strategy proposes keeping the development of the bus network under regular review to cater for growth in population and employment, maintain good coverage and interchange and ensure value for money through investment in optimum service improvements. While this makes good sense, it appears to fall short of a fundamental review, which we believe will be necessary to provide optimum service levels at a manageable cost.
33. In the shorter term, where bus services are identified as running with low occupancy at particular times of day, a modest extension of the gaps between services could save money and support other policy objectives such as reducing pollution and saving energy.

Managing the road network - network capacity

34. We suggested in our response to the Statement of Intent the development of rail-based park and ride, accessed from the M25. We believe that this offers the potential to reduce the demand for road capacity, particularly in outer London.
35. We welcome the support for park & ride schemes in outer London that reduce congestion, journey times and road vehicle miles (*Proposal 126*). However, we believe that the suggestion of M25-based park and ride is a more strategic concept which could only be developed with the full involvement of TfL.
36. We suggested also that the widening of the A21 south of Bromley town should form part of the Strategy. We note that the Implementation Plan at Chapter 7 of the Strategy contains few named road projects. We would be happy to be assured that this project could be seen as a local road capacity enhancement where a net benefit can be demonstrated, under the terms of Proposal 34.

37. We believe that both railheading and intrusive on-street parking around stations could be reduced by providing more station parking, for example by adding an additional deck to existing car parks where this is feasible in engineering terms. Orpington Station is one location in Bromley where we believe this would be possible.

Managing the road network - smoothing traffic flow

38. We welcome in general terms the Mayor's commitment to the importance of smoothing traffic flow to provide journey time reliability (*P85 para 152*), including targeted road network improvements (*P150 Proposal 30*) and local road capacity enhancements where a net benefit can be demonstrated (*P154 para 378, Proposal 34*). We support in principle trialling the removal of traffic signals where safe and appropriate (*P205 Proposal 83*). Indeed, we would urge the Mayor to consider going further by trialling 'turning left on red' at certain junctions and programming other lights to 'flashing amber' as work so successfully in the USA.
39. In our response to the Statement of Intent, we sought a programme aimed at eliminating congestion "pinch points" in the road network. We believe this is similar in intent to the proposals in the draft MTS which we have welcomed above. However, progress in this area will be heavily dependent on budgets and on the way in which the criteria adopted for screening as set out in Proposal 34 are applied.

London's airports

40. The section on airports does not mention Biggin Hill (*P173-174*). In response to the London Plan, the Council has commented that any growth of capacity at Biggin Hill airport will be strongly resisted, particularly bearing in mind the existing operating lease.

Encouraging more cycling and walking

Cycling

41. The Council welcomes the general promotion of cycling and notes that two-thirds of the potential for increased cycling is in outer London (*P176 para 454*). We also welcome the proposal to provide additional cycle parking across London (*P175 para 449*). There is a growing interest in recreational cycling, and we would welcome a reference in the Strategy to the need to develop well signposted recreational cycling routes in addition to those used for other trips.
42. We await with interest the outcome of the introduction of the cycle hire scheme to inner London. However, we believe that only the experience of operating this scheme will identify how appropriate it is to the lower densities and longer distances in outer London. We therefore consider it premature for the London Plan (*LP p154, Policy 6.9*) to require boroughs to identify sites for cycle docking stations to allow the expansion of the cycle hire scheme, and furthermore would urge the Mayor to consider whether this level of detail is appropriate to a high-level strategy which aims to give boroughs greater freedom to decide for themselves how to meet the Mayor's strategic objectives.
43. It is proposed that the Mayor should lobby central government with a view to allowing cyclists to cycle the wrong way down one-way streets (*para 471 &*

Proposal 54). The Council considers that this is a national rather than a London proposal which is inappropriate for the MTS. While we note with interest the current experiments taking place in Kensington and Chelsea and will be content to study and judge future policy upon evolving evidence, we are inclined towards a position that such measures will need to be accompanied by extremely distinct signage and road markings, if they are to prove safe and successful.

Walking

44. The MTS proposes to roll out to other areas the pedestrian signing scheme known as “Legible London” which has been developed by TfL (*Proposal 60*). This implies that boroughs have a choice in deciding whether Legible London is appropriate to their local needs, and indeed the Implementation Plan merely uses Legible London as an example of improved wayfinding. However, the London Plan says that borough Development Plans “should” promote Legible London (*LP p155, Policy 6.10*). While Legible London has its attractions, it is inappropriate for the London Plan to be prescriptive on such a detailed issue. Decisions on minor matters such as this should be left to boroughs and not imposed through the planning system.

Improving London’s environment

45. The section on enhancing the built & natural environment makes no reference to World Heritage Sites (*P88 - 89 Section 4.3.3*). The Council is actively pursuing the designation of a WHS - Darwin’s Landscape Laboratory - in the vicinity of Downe village. We will face the difficult task of balancing the added interest that WHS designation will generate with the need to protect the village and the surrounding roads from excessive car traffic and dangerous or obstructive parking. We would welcome a recognition in the Strategy of the need to work with Bromley to maintain a sustainable approach to access to the WHS site.
46. We note that the Mayor “wishes to promote” the concept that parking charges should vary by location, length of stay and also the environmental impact of the vehicle (*P247 para 701*). While it is conventional that charges vary by location and length of stay, we believe that any imposition of charges in relation to environmental impact should be clearly expressed as being a matter for local determination. We therefore believe that this should be removed from the list of projects in the Implementation Plan at Chapter 7 of the draft Strategy.
47. Whilst we obviously recognise that National Government has chosen to commit itself to lower emission targets, we believe it is totally inappropriate, and demonstrates a total lack of transparency, that Councils could be asked to fulfil the role of acting as their tax collecting agents. If any Government of the day wishes to progressively tax cars with larger engines, they should collect the revenue at the vehicle’s point of sale and justify their policy to the electorate, not through hidden stealth taxes.
48. The Strategy aims to deliver infrastructure for the distribution of alternative fuels (including electric charging points) by 2015 (*P229 Proposal 104*). While we welcome this in principle, we seek assurances that boroughs will be free to ensure that facilities are only introduced when there appear to be existing or imminent local levels of demand which would justify this infrastructure. We

believe that the longer distances associated with car journeys in outer London may discourage the adoption of electric vehicles until the technology improves.

Managing the demand for travel

49. Parking regulation is mentioned as an effective method of encouraging public transport, walking and cycling (*P246 para 693*). This implies that the availability of on-street parking space will be restricted, even where it is possible to provide space safely and without affecting highway capacity. The Council does not support any such approach, as it is likely to have an adverse effect on the commercial viability of local town centres.
50. The Strategy says that parking standards in new developments will be used to make travel planning more attractive and encourage public transport, walking, cycling and car sharing (*P82 para 145, P86 Policy 11*). This implies that parking standards will be restrictive, specifically to enforce a change of travel mode. While we support the concept of promoting sustainable alternatives where these are both practical and available, we have concerns about the way these standards may work in practice.
51. Detailed parking standards are set out in the London Plan rather than the MTS, and are related to Public Transport Accessibility Levels (PTALs), which are the standard method of assessing accessibility (*P68 para 124*). Paragraph 6.39 of the London Plan says that TfL “may refine how PTALs operate” after consultation. This latter point is welcome, because the Council believes that the current PTAL system does not adequately address accessibility issues outside the main outer London town centres. Specifically, PTALs fail to recognise that the destinations of those living in outer London are many, varied and frequently lack the credible public transport options taken for granted in more central locations.
52. We believe that the commitment to a review of PTALs should be firmed up, and that there should be a specific reference to such a review in the Transport Strategy.
53. The Council’s response to the London Plan opposes the proposed parking standards on the grounds they fail to take account of PPS3 “Housing” regarding local circumstances and the need for a more generous standard for residential development in outer London to avoid unsatisfactory on-street parking and to support the local economy. We are opposed to maximum parking standards for residential parking and believe that minimum parking standards should be used.

Road user charging for economic and environmental aims

54. Road user charging is mentioned as a technique for managing the road network, smoothing traffic flow and congestion management (*P33 para 36*), and which the Mayor may consider applying in metropolitan town centres (*P253 para 727*). Charging is also mentioned alongside other “regulatory demand management measures” to reduce CO₂ (*P231 Proposal 108*) and in relation to freight (*P87 para 162*).

55. The Council made clear in its earlier response to the Statement of Intent that it does not believe any case exists for road pricing, and rejects road pricing as a solution for Bromley. We implore the Mayor to discard such overt anti-car measures from his evolving MTS.

Other matters

Financial issues

56. The Strategy correctly points out that it is up to individual boroughs to seek the financial resources to fund its LIP proposals to implement the MTS (*P292 para 755*). This stems from the original legislation, and there is no legal requirement on the Mayor or TfL to provide transport funding to boroughs, only an empowerment. A footnote to the Implementation Plan says that “secured” funding shown in the projects table is not fully secured because of periodic government expenditure reviews (*P275*).
57. Given the uncertainty about future funding levels, and the fact that the Strategy proposes “necessary minimum” levels of investment (*P296 para 767*), we believe it would be unrealistic for the Mayor to insist that boroughs find funding to implement his LIPs programme, should it not possible for TfL to provide the levels of borough funding required to support his Strategy. We therefore suggest that the Mayor should include a statement in the Strategy offering the boroughs an assurance that he will not make any such demands on borough finances or through us, upon our Council Tax payers.
58. While we welcome the recent changes to the LIP funding system, which have provided boroughs with substantially more freedom to use TfL funding to meet local transport needs within the framework of the MTS, we believe that further flexibility is needed to assist with funding larger infrastructure projects such as the station and hospital parking projects referred to at points 15 and 37 above.

Sub-regional Transport Plans and Delivery & Servicing Plans

59. The Council’s response to the Statement of Intent expressed concern about a lack of clarity about the role, form and content of the five Sub-regional Transport Plans. These plans are not a statutory requirement, and their content will not be known for some time. We therefore believe that SRTPs should remain advisory only.
60. Nevertheless, the MTS says that proposals in the SRTPs will “need” to be included in LDF Core Strategies (*P83 para149*), and, on the preparation of borough LIPs, paragraph 753 says “the MTS and non-statutory London sub-regional transport plans will provide the overarching framework for their development.”
61. The Council remains anxious to work with TfL and our neighbouring boroughs on the development of SRTPs for South and East London. However, on a matter of principle we believe it is wrong for the Strategy to require boroughs to comply with these additional plans before it is known what they contain.
62. A similar consideration applies to the London Plan, which requires development proposals to submit Construction Logistics Plans and Delivery and Servicing

Plans in accordance with TfL guidance which does not yet exist (*LP p147, Policy 6.3*).

Drafting issues

63. There are a number of discrepancies between the tables of transport projects included in the MTS and London Plan. These should be resolved when the final documents are published, or explanations provided about differences which intentionally remain.
 64. The Draft Strategy contains a number of sections labelled as “spotlights” and “case studies”. Given that borough LIPs have to demonstrate how authorities will implement the Strategy, it is not appropriate to have these sections in the main body of the Strategy, since they cannot be “implemented”. We suggest that these sections are moved to an appendix.
 65. Figure 9 on Page 49 incorrectly implies that Orpington is on the A21 and the Princess Royal University Hospital is on the west side of the A233. This should be corrected.
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