Chapter 10 Transport

Overview: The relationship of this chapter with the others is a challenge in itself to get right. London's population is predicted to increase considerably, but the current Plan and draft new Plan are not doing enough and will not do enough to reduce the need for people to travel and to maximize uptake of walking and cycling before bringing forward mega transport projects. New roads and river crossings for vehicles, which would add to the problems of traffic congestion and pollution, are being pursued without non-road alternatives being properly considered. Poor attention has been given to social and environmental factors, such as carbon emission targets, air quality, public transport fares and local employment. The Plan and the Mayoral Transport Strategy need binding policies to bring essential changes in our transport habits.

This is not simply a challenge that can be resolved through closer attention to proper policy formulation within this chapter, but requires a substantial change to the visioning of London's future as presently set out in the Plan's Chapter 1 Planning London's Future (Good Growth Policies) and further elaborated elsewhere in the Plan. A substantial change to one that embraces a new geography and imagination for London: one underpinned by inclusive growth, fairness and diversity of people, businesses and places; more balanced and polycentric, with Lifetime Neighbourhoods and Lifetime Suburbs; therefore, avoiding reliance on the Central activities Zone/Isle of Dogs, high-order Town Centres and on a small number of economic sectors. (See our response elsewhere, particularly on Chapter 2 and the Appendix: Proposal for a Community Generated Spatial Option).

It is standard practice for strategies to translate their visions into objectives and thence to policies and proposals. Just Space in its Towards a Community-Led Plan for London publication set out, among many other ones, transport objectives that this network asks should set the framework for transport planning. To serve as examples, they are attached to the end of this part of the response on Transport as Annex: Transport Objectives. By applying these Objectives, the Policies and Proposals of the Plan would need to change. These changes are discussed policy by policy below.

Monitoring: There is only one numerical and temporal target within the Transport Policies (in T1). For this, milestone measures and targets en route to 2041 should be clearly stated to make possible an effective evaluation, monitoring and managing process. In addition, other targets and milestones need to be set to ensure that the necessary organising of London with the provision of appropriate infrastructure for better walking, cycling and public transport, that is sufficient, accessible, reliable, safe and affordable, are delivered. These need to finely attuned and specific to the policies and proposals because Chapter 12 Monitoring's Key Performance Indicators and Measures are high-level and distant from the Transport Policies.

Whilst it is noted that TfL's Travel in London annual statistical report will publish trends and outcomes (12.1.5), it is standard practice for the tests of appraisal and evaluation and the indicators to be identified within the 'covers' of a strategy.

So far the draft Mayoral Transport Strategy (MTS), as published for public consultation, "does not include a comprehensive set of monitoring indicators to measure and evaluate progress towards the goals or improvements against the challenges identified in the MTS" (draft MTS 8.5.3). Again, the multi-criteria framework tool to appraise schemes and proposals has yet to be developed (draft MTS 8.5.4). Evaluation and monitoring, consequently, will be problematical without further targets and milestones to the Transport Policies of the Plan.

T1 Strategic Approach to Transport: supports a transition to sustainable transport and sets a target of 80% of trips in London by 2041 to be made by Active Travel (foot, cycle or public transport). Given that the absolute numbers of trips are predicted to increase, this would be a transformational and challenging accomplishment. The task of such modal shift is understated here. Reducing the need to travel does not inform this Policy or Chapter. As with the draft Mayoral Transport Strategy, Road Traffic Reduction Target Setting should be part of policy.

Reduce the need to travel: Planning should start with reducing the need to travel as well as to the promotion of sustainable and active travel. This requires greater attention to facilitating walking and mainstreaming cycling. Cars and HGVs (Heavy Goods Vehicles) are a dominating influence on London whereas car sharing, cycling and walking are liberating. Amenity, the environment and users should not be subordinated to the demands of road traffic, but should be enhanced by appropriate levels of connectivity with the emphasis on the sustainable modes of travel. Reallocation of road space between users would ensure fairer share of space for cyclists, buses, pedestrians and public realm. The aim should be to achieve liveable attractive places and spaces for all parts of London, not simply the iconic destinations, such as Oxford Street, and for all, including, for example, children, the disabled, not just active adults.

Road Traffic Reduction Target Setting should be part of policy. Target setting would provide benchmarks to measure progress, determine the need to strengthen or further resource implementation and require other agencies and authorities to fulfil their responsibilities in delivering an integrated transport strategy.

Road user charging, London wide, would change travel behaviour, may make streets more pleasant places, and tackle congestion and pollution. (It is still in the current London Plan 2015 - para 6.39A). It would need to be applied in an equitable and proportionate way and could operate in a variety of ways, such as higher charges during peak periods or for certain vehicle types etc.

Acceptance may prove problematical over, for example, privacy issues, but the Mayor should commit to developing these schemes rather than simply "considering" as per the draft MTS's Proposal 19 [draft MTS p83]. With traffic reduction, this would create a fairer share of space for cyclists and buses, and the revenue raised used to support sufficient, reliable, safe, affordable and accessible public transport.

This, together with reducing the need to travel and the adoption of the sustainable travel hierarchy, should underpin the whole of the Plan. This means prioritising improvements for walking and cycling to more local facilities before mega-transport schemes and agglomeration. (For example, see https://www.imeche.org/policy-and-press/reports/detail/transport-hierarchy).

Car Sharing: The widespread adoption of sharing could reduce on street parking, improve the street scene and create space for the Healthy Streets Approach. The encouragement and facilitation of this should be made explicit. This would align better with the principles of a Circular and Sharing Economy.

Transport and the Spatial Development Patterns: Transport Chapter (**T1 or perhaps T3**) should say more on how the Policies will result in a London that is spatially developed in a more sustainable way. Chapter 4's Policy H1 (B 2a) is the new suggestion in, for "incremental intensification" (4.2.5) which identifies "sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m of a Tube station, rail station or town centre boundary" (District, major, metropolitan and international town centres) for optimizing housing delivery potential on such sites as small housing sites, brownfield sites, strategic industrial land, surplus public sector and utility sites, low density commercial and retail uses etc. See also Maps 4.2 and 4.3. Densification of development at and around stations has generated and would generate typically speculative, formulaic 'luxury apartments' that do not meet local need in terms of affordability, tenure, unit sizes or amenities. It neither creates life time neighbourhoods (current London Plan policy) or sustainable development (national planning policy), but act as agents of change that disrupt and displace settled communities and are likely to lead to increased travel, both quanta and distance. And by occupying scarce sites such developments deprive localities of the opportunities for more carefully curated development attuned to their physical, economic and social fabric.

Outer London needs lifetime suburbs - mixed communities of jobs and homes with everyday facilities & services - to scale up lifetime neighbourhoods going beyond the small planning unit of the neighbourhood – with flourishing town centres. There needs to be a real mixed development strategy for Outer London that the Plan supports. This would reduce the need for travel, the length of travel, and overdependence on the centre of London (Central Activities Zone) by a greater share of economic opportunity, jobs and homes. However, a caution should be stated: that the 'High Street', industrial and

transport lands need to be protected to ensure the proper functioning of London including its local/real economy.

There are international examples that may usefully inform the strategy if used with care. Transit Oriented Developments (TODs) are planned integrations of neighbourhood service and employment hubs around rapid transit stations together with higher density development that has low levels of car usage. Tokyo's railway station areas can be seen as good practice. Across a wider scale, Malmö's Comprehensive Plan 2014 plans growth in urban multi-function concentrations around public transport nodes. Existing London Plan policy using the Public Transport Accessibility Level (PTAL) matrix promotes transit adjacent development, namely higher density development, but without the full realization of the sustainable development benefits of TODs.

There is a need to challenge this use of PTAL with new more sensitive assessments that analyse transport connectivity to, for example, employment opportunities, door to door accessibility, factoring in ease of travel etc. However, this must not be at the expense of retaining and creating sustainable communities. Any policy or proposal must be compatible with appropriate policies that prioritise social sustainability - strong and inclusive communities, recognising the value of existing local economies, delivering the homes that Londoners actually need and so forth. See our comments on D6 density.

Delivery: Whilst **T1A** refers to Development Plans (sic) and development proposals, it does not specifically refer to Local Implementation Plans (LIPs).The draft MTS writes relatively little: "Healthy Streets and healthy people, including traffic reduction strategies; good public transport experience; and new home and jobs" are "several policy goals [that] can only be achieved with substantial borough-level intervention" (draft MTS p275). These are quite fundamental ones for both the Plan and the draft MTS, and are all dependent on the willing collaboration of the boroughs in the light of the tenuous funding of the Plan and MTS (funding is assessed elsewhere in our response). The handing down of policies and proposals give limited space for the originating at a local level of proposals that are appropriate for the locality and its particular character and ambitions. To be effective in delivery, the Plan should clearly set out the resourcing and expectations to be placed up on boroughs having first ascertained that they are broadly acceptable and, therefore, realistic.

Future proofing: The new Plan should be more future proofed or future ready by recognising the changing ways of moving, working and living that are increasingly evident, such as on-line purchasing, electric vehicles and working from home/ peripatetically, declining TfL fare box; and are likely to emerge in the not too distant future, as with on-demand technology, artificial intelligence and job replacement, autonomous vehicles and drones. The resulting impacts

on travel behaviours, land uses and the spatial patterns of London should be explored through this 25 year strategy.

It is imperative that Connected and Autonomous (C&A) vehicles adapt to the street environment which is set to improve through the Healthy Streets Approach and that the street environment is not adapted to meet the technical requirements of C&A vehicles.

Professor Helmut Holzapfel (consultant to Mercedes Benz) in "Will future transportation technologies solve our transport problems?" seminar, 18th May 2017, UCL, predicted that vehicle manufacturers would seek to have street environments simplified and other road users more closely regulated or corralled. That C&A vehicles are not only fit for purpose but fit for our streets needs to be emphatically expressed.

T2 Healthy Streets: The Healthy Streets Approach should make more explicit attention to the protection and enhancement of mobility needs and that this should be expressed in policies **T2 and D7 Public Realm**. Unnecessary clutter, uneven surfacing, inadequate provision and so forth impedes walking and the mobility of those with electric buggies/scooters for the disabled or those with pushchairs. The emphasis on cycling , admirable as that may be, leads to a lack of attention on those who are unable to cycle or even to walk further or more frequently because of age, infirmity, disability – temporary or enduring – or because of personal duties such as caring for small children. The roll out of walkable attractive routes, places and spaces for all parts of London that put walking first should have good connectivity with public transport.

Access Upgrade: The present access upgrade programme is lamentable. Accessibility, where provided, stops at the platform edge with a gulf between that and the train. If you cannot use the stairs/steps, then a glance at a step-free tube map reveals that much of central London is inaccessible to you. And the 5 yearly performance of delivering step-free tube stations will decline over time according to draft MTS Figure 17 (p130-131): 2020-24 *25;* 2025-29 *15;* 2030-39 *15.*

Given the size of the Network Rail and Overground networks, Figure 17's one or two step upgrades per annum is disappointingly slow and will make only marginal improvements to accessibility over time. N.B. It is not clear how many of the step free tube stations that are promised will be upgrades of existing stations and how many will be new stations on the new lines/extensions.
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Denial of the ability to independently live and travel worsens the health and well-being of those with access issues. Until all bus stops, all taxi ranks, all rail stations and all tube stations are fully accessible this is not A City for All Londoners. Londoners do not have a prospect of full accessibility even by

2041. To be meaningful, this policy should include an ambitious and challenging time target of achieving full accessibility, say, within 2 terms of the Mayor.

Feeling Safe: on public transport and in the streets is crucial, particularly for the more vulnerable members of society. An important component of a secure environment is the presence of staff, as well as the specialised policing, on public transport. The recent reducing of staffing levels at stations was a retrogressive step. Policing of the streets through the Safer Neighbourhood Teams are important. Since the Mayor's Police and Crime Strategy has already been finalised, this will need to be revisited, to ensure that needs and proposals are aligned, integrated and adequately resourced.

Road Safety: The intentions here (10.2.8) to strive to reduce road danger and improve safety are commendable. But there are issues of safety around pavement cycling and the disregard of traffic regulations, shared surfaces and 'floating bus stops' which are separated from main pavements by cycle lanes. These all present hazards to pedestrians, particularly to the younger, older, disabled, and less agile members of the population. A wider adoption of 20mph speed limits should be part of the transition to Vision Zero whose implementation mechanisms need to be more fully explained.

T2C: This proposes that networks for Active Travel should be planned at an early stage in Opportunity Areas and other growth areas. The beneficial results of such planning are not manifestly obvious in Opportunity Areas currently being developed and given that the Mayor often takes a lead on preparing Opportunity Area Planning Frameworks, there is little confidence that there will be a different outcome as a result of this policy.

T3 Transport Capacity, Connectivity and Safeguarding: The priority schemes in policy are mostly for radial routes and would reinforce London's travel and economic focus on commuting to the Central Activities Zone. This is not sustainable development. The Heathrow Airport access schemes relate to airport expansion and not to 'modal shift' of existing airport's traffic to more sustainable transport. The bus network, increasingly important for orbital connections, should be comprehensive, frequent, high quality routes, but only has a small paragraph (10.3.6). The Plan should be rebalanced to be more proactive in promoting orbital connections, which can include tram/ light-rail and conventional rail routes and interchanges, and improving the bus network, including demand-responsive services.

Table 10.1: Planning London's transport system inevitably identifies a catalogue of generic programmes and specific projects. However, these should be designed to make the system work better. For example, by promoting the exploitation of counter direction radial route capacity; the creation of interchanges – whether rail, bus, cycle, walk - to enable a wider range of destinations; and recognising air quality as a fundamental

determinant of policy and practice. Any/all proposals should be 'future proof" by ensuring their passive potential for further adaptability and extension/expansion/integration. All project options should be open to debate and their impact assessments available for scrutiny to ensure user consideration and suitability for local communities.

A suite of measures, mostly small-scale, but targeted to achieve in an incremental way a denser coherent and convenient travel network should be the output of the Plan that recognises its funding limitations. (See comments below on Policy 9 Funding). So the aim should be to plan and make the transport system work better. In this way of more and improved interchanges the progress to seamless journeys can be accomplished. The answer is not to build more 'Crossrails' whose funding is not assured and if funded would starve other proposals of scarce capital investment. Supporting the bus network would reap better returns.

Bus services & Orbital services: London's predicted population growth will sustain improved levels of service and patronage. This will make feasible the intensifying and extending bus services coupled with the creation of orbital and long distance limited stop bus services. Orbital connections, which can include tram/ light-rail and conventional rail routes and interchanges, should be promoted. Bus reliability and affordability is a good objective to help a significant number of Londoners who depend on the buses, but too much relies on a reduction of traffic congestion to increase bus efficiency. Specific implementation proposals could include more segregated and continuous bus routes to overcome congestion delay, particularly in the light of growing distributed delivery services (e.g. Amazon) and private hire (e.g. Uber) which may well adversely affect congestion levels. There is a need to ensure that bus and rail services are closely integrated and linked and connect with transport for the wider South East region.

Demand-responsive bus services: would be particularly appropriate for those with disabilities or older persons, for example, having to attend medical appointments, luncheon clubs etc. from/at widely dispersed origins and destinations where conventional bus routes are relatively coarse-grained. This should be actively promoted to remedy the 'accessibility deficit' endured by a growing sector of the population. (See draft MTS Supporting Evidence: 2011-2041 GLA population change +28%, but for those over 70 years old, +85%). And given that community transport is likely to face increased demands as the elderly population grows in numbers and the service is faced with funding difficulties.

T4 Assessments and Mitigating Transport Impacts: T4D: That developments may be contingent on the provision of necessary public transport and Active Travel infrastructure as a policy requirement is not strongly expressed enough. Developments, in order to achieve sustainable

development should fully address their transport, and for that matter environmental, health etc. impacts, and support public transport networks that are able to accommodate any additional movements.

T5 Cycling: this promises that barriers to cycling will be removed; a healthy environment in which people choose to cycle will be promoted; by a London-wide network of cycle routes and appropriate levels of cycle parking. Current proposals, such as the cycle super highways, quiet ways and Mini – Hollands (cycle friendly low traffic areas) have yet to demonstrate critical mass take off. Cycling network should be comprehensive (fine grained) and segregated, covering all cycling needs and potentials, and not only super cycle highways, which are very high level. The ambition should be to achieve a take-off in everyday 'civilised continental style' cycling. Therefore, the policy and proposals should be explicit on the 'normalising' or 'mainstreaming' of cycling as the mode of choice, but requiring a transformational implementation strategy that progressively builds up the modal share for cycling.

T6 Car Parking, T6.1 Residential Parking, T6.2 Office Parking, T6.3 Retail Parking, T6.4 Hotel and Leisure Users Parking: these policies outline a reduction in parking to encourage more sustainable transport. Car-free development should be the starting point for all development in places that are, or are planned to be, well-connected by public transport. Developments elsewhere should be designed to provide the minimum necessary parking. However, reducing facilities for private vehicles may adversely affect the mobility of vulnerable and disabled persons. Carers may need cars to visit and transport the cared for. The elderly and others may not be sufficiently mobile to cycle or walk, even to public transport. Issues such as these were raised when Congestion Charging was proposed for introduction and the learnings from this should be more evidently applied. Strategies that harmonise parking policies with mobility and public transport policies should optimise connectivity and accessibility, particularly for the disabled and elderly. Reducing facilities can also hinder those who are often self-employed, that need vehicles which are their mobile workshops/stores (e.g. plumbers) in order to provide essential services to London.

More electric charging points should be provided, not just in new developments.

T6.2 should be retitled to ***workplace parking*** as it relates to more than office parking matters.

T6.5 Non-Residential Disabled Persons Parking: This is not precise and emphatic enough to ensure that London becomes fully accessible and user friendly to all as soon as possible. The proposed parking standards for the provision of disabled persons' parking spaces should be doubled to cater for

presently unrecognised demand and the growing ageing population living with impaired mobility.

T7 Freight and Servicing: The promotion of an integrated approach to freight together with enhanced water transport to which road freight should be shifted should be both a strategic aim and incorporated into Policy. Freight and delivery vehicles in particular have been increasing their number of trips and are expected to so continue unless proactively managed. Rationalisation is needed. There should be a network of consolidation hubs and managed distribution for the final leg of delivery. Wide area wide restrictions on goods vehicles (other than permit holders) would direct freight into consolidation freight hubs which would manage and rationalize distribution. A surcharge/levy on central London business deliveries could assist reducing congestion.

T8 Aviation: The following does not imply acceptance of the need for airport expansion. As with many other forms of development, any expansion or intensification must have their environmental and health impacts fully addressed, not worsen existing air quality, and provide transport networks that are able to accommodate any additional movements.

T9 Funding Transport Infrastructure through Planning: the Mayoral Community Infrastructure Levy (MCIL) is restricted to funding strategic transport schemes, initially to Crossrail 1 (Elizabeth Line) and, if agreed, to Crossrail 2; if not, then to other strategic transport projects. Planning obligations (Section 106 agreements) will be sought to mitigate impacts and create the other transport and public realm improvements necessary to support London's growth. New (undefined) funding mechanisms will be investigated (10.9.5).

Going along with the funding issue are the cost to public finances, the opportunity costs of forgoing spending on other forms of public good – particularly "affordable housing" and social infrastructure, and the pricing of transport that becomes unaffordable because of the monies that need to be found for the many, large and expensive transport schemes.

This Plan does not provide evidence to give clarity and certainty on how transport infrastructure will actually be delivered and as well as not comprising the delivery of other kinds of infrastructure that London presently needs, and increasingly in the future will need; such as "affordable housing", utilities, and the various essential facilities underpinning the social, environmental and economic fabric – schools, health centres, parks etc. Much of the Plan's realisation is predicated on the precarious premise that the Mayor will acquire new powers, particularly financial ones ((10.9.5, 11.1.32-33).It is also dependent on the willing collaboration of the boroughs.

The cost of the Mayor's Transport Strategy is estimated at some £82 billion unadjusted for inflation etc. (£3.3bn pa (from 11.1.26) times 25 years). Whilst the funding gap between this and known income streams is not estimated, there is an out of date estimate from the London Infrastructure Plan 2050 (11.1.11-12) for public sector investment (i.e. not just transport) which is £3.1bn pa unadjusted. However, the MTS's costing is advanced on the basis that this capital investment would represent three-quarters of the National Infrastructure Commission's recommendation for spending on economic infrastructure. But this represents the lion's share, if ever such sums became available, and would inevitably deny the meeting of other extensive demands for long term infrastructural renewal as set out in the London Infrastructure Plan 2050. There are apart from transport other priorities for essential infrastructure to remedy existing deficiencies and provide for predicted future population and economic growth. The Plan should be realistic about the resources likely to be available and reformulate its proposals and programmes accordingly. The Mayor shall have regard to, among other things, the resources available for implementation of the strategy (GLA Act 1999 Section 41(5)). As it stands, the Plan is not deliverable as it does not have a coherent financial plan.

As for funding, there could be various income streams and speculative financial tools and powers, but their feasibility and practicality are not detailed how they could be applied in an appropriate mix and scale to deliver the envisaged capital investment that will, in turn, also place additional demands on revenue spending. TfL's fare box has started to decline.

There is no objective evidence to indicate how a funding gap will be met, as possible sources are increasingly to be drawn on for council core budgets and possibly not available (e.g. business rates; borrowing against future business rates). CIL only makes a marginal contribution (£300 million to £16 billion Crossrail) and increasing the levy rates would adversely impact on development 'viability' and planning benefits, especially affordable housing. Tax Increment Financing (TIF) – to borrow off the back of predicted future revenue returns - would mean mortgaging the future, to be covered by future generations of tax payers. The capacity to sustain this level of borrowing is unpredictable and imprudent in the face of multiple uncertainties regarding the UK and London economies, as well as additional debt burdens already accruing to the Mayor associated with developments across London (such as Vauxhall Nine Elms presently and maybe at Old Oak in the near future).

TfL has reported to the London Assembly recently that there is a current dispute over who should pay for £240million for station design changes at Battersea Station on the Northern Line Extension. Keeping the station closed after the 2020 launch date is an 'option'. Committing to a programme of heavy transport infrastructure is imbued with risk. The proposals for meeting a funding gap are thus highly insecure and potentially onerous for current and future Londoners both in terms of a future tax burden, and possible unfulfilled necessities for investment other than transport.

As a consequence, **Table 10.1** is largely a wish list.

Affordable Public Transport: There is an important social dimension to transport, which, if it is to effectively contribute to proper planning of London and the achievement of sustainable development, should address affordability and accessibility. These are often of great concern. All elements of public transport should be planned and operated in an integrative way with fare structures, tariffs and facilities that enable all to readily access those services most appropriate to use. The report, "Living on the Edge" by London Councils et al, Dec 2015 revealed that low paid workers are disproportionately affected by rising transport costs. The cost of changing between bus and train can be relatively expensive – in a sense a double charge, making longer multi-modal trips unaffordable. Having a single transport operator within London would assist fare equalisation. The persistence and prevalence of low wage employment often means long and unsocial hours of work. Adding time consuming commuting to this 'life of work' as a consequence of having to use less expensive but more time-consuming travel options is detrimental to well-being. So too is the kind of spatial organising or planning of London that deliberately distances places of work from homes etc..

Waterways: are no longer termed the 'Blue Ribbon Network', and are subsumed into such Chapters as 7 Heritage and Culture, 8 Green Infrastructure and 9 Sustainable Infrastructure, with a reduction in policies and text. The 'Blue Ribbon Network' of the current London Plan should be reinstated to reflect the strategic significance of the interweaving and interconnected extent of waterways throughout London.

On the waterways there should be (more) multi-stop, fast ferry services, with TfL providing more resources for water transport (existing fare structure and waiting times are a barrier). Crossing the Thames by ferries has more merit than building more bridges, even if they are walking and cycling bridges. Shift road freight to rivers and canals by enhancing water transport opportunities, facilities and services. Operational facilities for water transport, to a degree, have policy protection through the existing London Plan 2016 (see policies 6.2 & 7.26), but satisfactory adherence to these is contested by developers etc.

Annex: Transport Objectives

Reduce Need to Travel by lifetime suburbs, providing key amenities and job opportunities locally **and Plan and Make the Transport System Work Better** with smaller scale changes balanced throughout London and greater public participation in transport planning

Promote Active, Affordable, Integrated and Accessible Travel that is the alternative by choice to car dependency: More investment throughout

London in walking, cycling and accessible transport, and in Outer London in public transport services, particularly bus services and Orbital Rail.

Improve environment and infrastructure: Strong road traffic reduction targets, fewer vehicles and cleaner vehicles; implementing London wide road user charging, strengthening Low Emission requirements to include cars and avoiding traffic generating transport schemes.

Promote an integrated approach to freight; With a network of consolidation hubs and managed distribution for the final leg of delivery. Shift road freight to rivers and canals by implementing the Blue Ribbon Network and enhance water transport opportunities, facilities and services.