

## **This response is to both Transport Sections 5.12 and 5.13**

From Hayes Community Forum

I was instrumental in writing up the comments that were made by constituent community and interest groups that formed Just Space in 2016 on transport matters that then informed later submissions to public consultations on the draft London Plan and Mayor's Transport Strategy.

Much of this is still relevant to current issues and to the Towards a New London Plan (TaNLP) document/survey. Therefore, I will remind you of them suitably amended/updated.

**Provocation:** TaNLP's Section 5.12 sets out several significant challenges, but these can be seen as the product over time of limited and/or misdirected policy and programme interventions. The London Plan has not been doing enough to reduce the need for people to travel and to maximise uptake of walking and cycling before bringing forward mega transport projects. It has pursued new roads and a river crossing for vehicles, which add to the problems of traffic congestion and pollution, without non-road alternatives being properly considered. Given the scale of the challenges, inadequate attention has been given to the social and environmental consequences of the deficiencies in London's transport services, facilities and networks: such as excessive carbon emissions, high public transport fares, uneven accessibility and availability for all, higher accident rates for the more deprived areas compared with more affluent ones. Welcomed progress has been made on air quality.

The London Plan (and the Mayoral Transport Strategy) need binding policies and appropriate programmes to bring essential changes in our transport habits. Such as the following:

**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

The case for a **more polycentric London** is now being aired, something that Just Space advocated from 2016. Outer London needs lifetime suburbs - mixed communities of jobs and homes with everyday facilities & services - to scale up the '15-minute city' or lifetime neighbourhood concept. To operationalise this there needs to be a real mixed development strategy for Outer London. This would reduce the need for travel, the length of travel, and overdependence on the centre of London (CAZ Central Activities Zone) by a greater share of economic opportunity, jobs and homes.

Note that industrial and transport land needs to be protected to ensure the proper functioning of London including its local/real economy. There is a broader potential issue around the accommodation of 'growth' as seen principally through the lens of mandated housing targets. Any resulting deindustrialization of Greater London and the decanting of essential services and production beyond the Green Belt to neighbouring authorities, would generate longer journeys from depots, factories and warehouses into London. And would reduce the range of employment opportunities within London and may extend travel to work journeys.

Planning London's transport system inevitably identifies a catalogue of generic programmes and specific projects. 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 for all or most modes of travel to enable a wider range of destinations; appropriate accommodation of wheeling; non-radial tangential routes as epitomised by the West London Orbital; improved suburban rail services. Actual or typical, reliably repeatable, journey times door to door and the quality of those journeys need to form the basis of the transport planning tool PTAL. Such a suite of measures, mostly small-scale, but targeted, would achieve in an incremental way a denser coherent and convenient travel network.

Any/all proposals should be 'future proof' by ensuring their passive potential for further adaptability and extension/expansion/integration. Local Implementation Plans (borough transport plans) lack weight and cross boundary projects. All project options should be open to debate and their impact assessments available for scrutiny to ensure user consideration and suitability for local communities.

**Promote Active, Affordable, Integrated and Accessible Travel that is the alternative by choice to car dependency:** More investment throughout London in walking, wheeling and accessible transport, and in Outer London in public transport services, particularly bus services and bringing Overground levels of improvements ('metro-isation') to national rail suburban rail services.

There is an important social dimension to transport, which, if it is to effectively contribute to proper planning of London and the achievement of good growth and sustainable development, should address affordability and accessibility. These are often of great concern and the present access upgrade programme is tardy. 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 low paid, often key workers for the functioning of London, and the vulnerable are disproportionately affected by rising transport costs, as are those families dispersing from inner to outer London.

Planning should start with reducing the need to travel and to promote active travel, namely, walking, wheeling and public transport – sustainable modes of travel. This requires greater attention to facilitating walking and mainstreaming wheeling. The benefits include those for health, the environment and tackling congestion. Cars and HGVs (Heavy Goods Vehicles) are a dominating influence on London whereas car sharing, wheeling 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 wheelers, buses, pedestrians and public realm. Specific implementation proposals could include more segregated bus routes to overcome congestion delays; a focus on wheelers and pedestrians; a wider adoption of 20mph speed limits. The aim is to achieve liveable attractive places and spaces for all parts of London, not simply the iconic destinations, and for all, including, for example, children, not just active adults. The Healthy Streets principles are welcomed, ensuring that they are applied throughout Greater London.

**Improve the environment and infrastructure:** Strong road traffic reduction targets, fewer but cleaner vehicles; implementing an equity-based London wide road user charging scheme and precluding traffic generating transport schemes.

An important driver of transport planning to meet air quality targets has made significant progress. But climate change remains an issue even if the air quality crisis is diminishing. An implementation strategy setting out the measures that are eventually determined to be necessary to fulfil the objective and policy is essential.

Currently there is a 2041 target for 80% of trips to be by sustainable modes, but car use and carbon emissions remain stubbornly high, and congestion is worsening. Road Traffic Reduction Target Setting would guide policy and proposals by providing 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 and tackle congestion and pollution. It would need to be applied in a fair and proportionate way and could operate in a variety of ways, such as higher charges during peak periods, levels of congestion or for certain vehicle types etc. The revenue raised could be used to support sufficient, reliable, safe, affordable and accessible public transport.

Higher density developments should not come with cars and parking, save those for blue badge holders and car clubs. Such developments even in more suburban

locations are seeing unused parking spaces. Transit-orientated developments should be promoted particularly around suburban transport nodes.

**Promote an Integrated Approach to Freight:** With a network of consolidation hubs and managed distribution for the final leg of delivery. Protect and enhance rail freight facilities and networks. Shift road freight to rivers and canals.

Wide area wide restrictions on goods vehicles (other than permit holders) would direct freight into consolidation freight hubs which would manage and rationalize distribution.

Rail freight plays a vital role in delivering goods for London, reducing congestion and improving air quality. Each day existing rail freight services remove an estimated 4,000 Heavy Goods Vehicle (HGV) trips from London's road network and, overall, rail freight produces 76 per cent less CO<sub>2</sub> per tonne than road freight. To achieve further opportunities to shift freight on to the rail network where possible there is London's first Rail Freight Strategy

(<https://www.networkrail.co.uk/wp-content/uploads/2021/05/London-Rail-Fr...>) . The new London Plan (and Mayoral Transport Strategy) should not only protect existing used and presently unused railway land and assets that have an operational potential. But also bring forward specific interventions to enable the shift of freight from road to rail and to allow for the growth of regional/ national freight services.

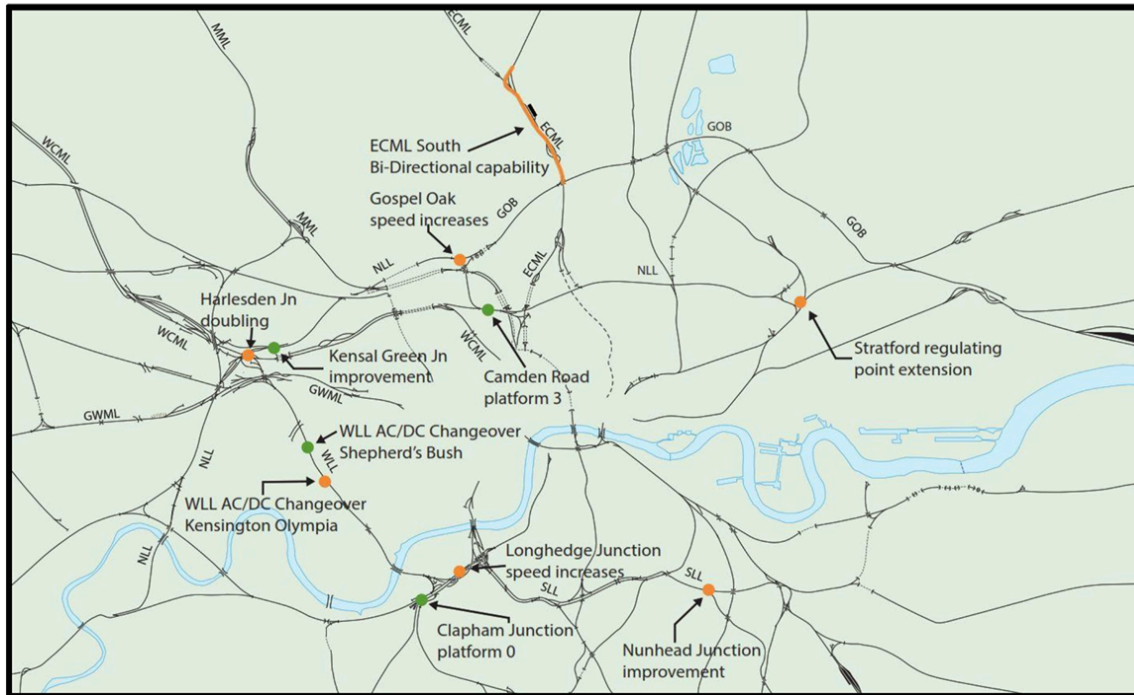
Operational facilities for water transport need to be continued to be protected. More ferries across the Thames may be a useful meanwhile solution whilst waiting for bridges to be funded and constructed.

END

June 2025 Robin Brown, Hayes Community Forum

POSTSCRIPT: John Cox of the Grand Union Alliance has recommended that the following images be added to the Just Space website to illustrate points made in my submission:

The London Rail Freight Strategy's Core Interventions (in green) & Additional Options (in red)



Further illustrations of some interventions, particularly Camden Road Station

**Camden Road**

Closed 05/06/1924  
Closed 07/12/1950  
Closed 05/12/1970  
Closed 01/07/1987  
Closed 01/01/1997

**Conflicting Proposal**

**A new park in the sky for London.**

**THE LONDON RAIL FREIGHT STRATEGY**  
OFFERED FOR THE FUTURE  
SUMMARY REPORT

**CAMDEN ROAD PLATFORM 3**

This proposal would reinstate a third track and platform on the northern side of Camden Road station, utilising part of the former 4-track formation through the station.

The additional capacity provided would facilitate much greater flexibility in pathing options for trains on this busy central section of the NLL, opening up new options for future service provision and bolstering performance resilience. Reinstatement of a third platform would enable platform 2 to be used as a central turnback, with platform 3 becoming the eastbound line for through London Overground services and the majority of freight. Transport for London modelling suggests that the eastern end of the NLL, from Canonbury to Stratford, will see some of the strongest long-term demand growth on the Overground network. A turnback platform will allow this to be addressed with peak capacity boosting Stratford-Camden Road services and there would also be the option to operate these through the off-peak, which could offer a means of providing additional passenger capacity where it is most needed. The availability of an additional platform would also aid performance recovery during perturbation on the orbital routes.

Camden Road platform 3	Kensal Green junction improvement	WLL AC/DC changeover relocation	Clapham Junction platform 0	NLL, GOB and WLL headway reductions
Reinstatement of a third track and platform on the northern side of Camden Road station, utilising part of the former 4-track formation through the station.	Upgrade of the junction, moving it slightly to the east and realigning the layout, to facilitate faster crossing speeds sufficient for a 3-minute planning margin.	Extension of the overhead wires further along the WLL, to provide AC electrification as far south as Shepherd's Bush station.	Creation of additional bay platform capacity at the northern end of Clapham Junction station, for the use of London Overground WLL services.	These are improvements on which this strategy is dependent, but are expected to be realised through wider enhancement programmes, so are not being directly proposed by the LRFS.