

COMMENTS ON DRAFT NEW LONDON PLAN

Good growth (chapter 1)

The objectives are admirable, but the plan falls short of delivering them.

Land is scarce, but insufficient road space and priority is given to buses. Insufficient land for development is wasted on dwellings that are unaffordable. Failure to reduce the need to travel (a key objective in the first London Plan) by the creation of a polycentric city of living neighbourhoods leaves buses competing unsuccessfully with cycles and parked cars.

Growth that benefits all is laudable, but the population is aging and insufficient weight is given to the needs of disabled people, who are predicted to increase as a proportion of the total.

We regard the housing targets as unrealistic, given the availability of land, labour, materials and funds both for construction and supporting infrastructure. Our main concern is the latter (see comments on Annex D).

MBUL1: Spatial strategy

There needs to be clarity about where railway land is needed for railway development, including links to industrial land, and when it can be released for development. The Plan should encourage more use of rail for freight (cross reference to MBUL2 &GHR10), and transport infrastructure that supports local journeys and not just radial routes into central London.

MBUL2 Optimising land use

The target of 80% of journeys by sustainable means by 2041 (MBUL5) is unlikely to be achieved without significant growth in bus usage. Yet bus use is declining. Research cited by London TravelWatch suggests that a 10% increase in journey time can result in approximately a 6% decline in demand. Declining bus speeds caused by congestion and insufficient priority – where bus priority interventions can improve bus speeds and regularity as well as smoothing traffic flow (e.g. Walworth Rd). There is concern at falling usage, service cuts reinforcing a cycle of decline, and poor public bus service and coverage in Outer London.

Solutions include: more bus priority measures; removing parking at congestion points; more bus lanes; traffic signal prioritisation for buses; better orbital bus services such as Superloop routes. Improving bus performance is essential for reducing car dependency. Without a commitment to these, the Plan does not give evidence that it will meet its commitment by 2041.

The Optimisation framework in table 2.1, replacing PTALs as a means of determining densities which transport can sustain, are still too broad brush. There needs to be a far more detailed assessment of the level of connectivity to newly development sites, and of the impact elsewhere.

There is a need for the plan to **protect currently-unused operational railway land**which might be required to support growth or boost the local economy. As an example, Future Transport London has tried to protect currently unused North London line trackbeds across Camden, in north London.

The 'London Rail Freight strategy' describes likely increased freight use of the North London Line from London Gateway (Essex) and Felixstowe container ports, and by Transport for London for increased London OvergroundMildmay line services between Stratford and Camden Road station.The London Borough of Camden, despite endorsing the case for enhanced rail services,simultaneously gave support to replace the trackbeds with the 'Camden Highline', something that inevitably would have been a permanent loss to the railway network.

MBUL5 Sustainable transport

Transport policy has been heavily rationalised and decentralised in the new LP, with one main policy (MBUL5) compared to the nine policies in the current LP. The Mayor's Strategic Target for transport – that 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041 – remains, but not as the prime upfront policy, instead hidden in the rationale for the policy. Reducing the need to travel has also faded away as an objective, and should be reasserted.

Transport policy is seen throughout the draft LP as subservient to enabling housing growth, as stated in the title of MBUL5: Sustainable transport to enable London's growth. New or improved public transport infrastructure is seen primarily as a necessary condition to facilitate growth, and is being used to justify speculative development and increased densities. The transport strategy pre-dates COVID. The Plan therefore fails to meet the NPPF requirement for an up-to-date vision based transport strategy.

The push to build housing around railway stations fails to acknowledge that not only must the stations have capacity to take additional numbers in the morning peak: the trains themselves must have sufficient capacity to ensure that people commuting shorter distances are not faced with gross overcrowding as a result.

Most stations provide radial links to the centre of London, but do little for short orbital journeys which less affluent communities are more likely to need. Provision for local journeys must be made before significant new residential development is approved.

Public transport and active travel are also presented as good in themselves. Private transport (private cars) are seen as a problem in multiple ways: reducing public health through inactivity and impact on air quality, increasing congestion, frustrating public transport

There is little consideration of how transport policy could support community wellbeing, health, affordability, and sustainability. Transport should instead foster social cohesion and community wellbeing; support public health through walking, cycling, and active travel; improve affordability and accessibility of London; and enable a more sustainable and less growth-dependent urban model.

All Boroughs must be compelled to digitalise maps of footpaths and public rights of way. Pedestrian movement must take account of the needs of disabled people, not just those who are wheeling but including those with visual or hearing impairment, and those suffering with anxiety. Taxis are the only form of accessible transport for some and should not be ignored by the Plan.

MBUL9 Healthy streets

Active Travel and Road Space Reallocation delivers major health and social benefits. But a modal shift will not occur without reducing space devoted to cars. Cycling remains constrained by poor infrastructure and safety concerns. Policy is needed on the reallocation of road space away from private cars, and a reduction of parking provision (see Lambeth's Kerbside Strategy). Fuel duty no longer covers wear and tear as successive governments decline to raise it in line with inflation and there is (slowly) increasing use of electric vehicles. There is an urgent need for a scheme of road pricing. It would tackle the imbalance between rail and road. Rail users pay for track maintenance, and pay more for travel at peak periods and for travel over more heavily used routes.

HN7 Housing size mix

The assessment of need for larger size dwellings is flawed. The demand is there but because housing is so expensive people are forced to live further from their place of work. As the population declines (its rise and fall has always been cyclical: a rise from 1901to 1939, a fall to 1983, and a rise from then until COVID) the opportunity arises to provide affordable family accommodation that would reduce the distances travelled and the pressure on road space.

GLE2 Supply of industrial land

As noted under chapter 1, there needs to be clarity as to how the conflicting demands for land are to be resolved. We strongly support industrial land with links to the railway network.

GLE9 Aviation

We strongly support the Plan's hostility to airport expansion at any of London's six main airports, with proposals for expansion "refused unless no unacceptable environmental, transport and congestion impacts are demonstrated". The problem with this approach is that what is deemed "unacceptable impacts" is not defined, and, as used similarly in daylight considerations, includes a balanced judgement of impacts set against benefits to determine acceptability.

Recent advice from the UK Climate Change Committee concludes that Heathrow expansion is not currently compatible with the UK's Net Zero trajectory under existing policies and that aviation emissions remain one of the most difficult sectors to decarbonise. Aviation emissions have more than doubled since 1990 while emissions from the wider economy have fallen substantially.

There is widespread opposition to airport expansion, concern over climate impacts, concern that increased airport capacity primarily supports leisure travel and brings no economic benefits (particularly if expansion is to enable Heathrow's function as a hub, where travellers interchange rather than enter London).

Drones are included in the GLE9 but the policy is weak and vague. There are concerns about noise, privacy and visual intrusion, security, and prevalence given the potential large-scale delivery networks. There is support for limited medical or emergency uses, but opposition to widespread commercial deployment without stronger safeguards.

GLE 10 Safeguarded Wharves

We support this policy, but there needs to be greater emphasis onriver-based transport uses, for construction materials and waste by river, for which river infrastructure needs to be retained. River transport remains underused and should form part of a sustainable logistics strategy

The key spatial impact of the Thames on movement, amenity, heritage, and identity has been gradually removed from the London Plan – from one of the five chapters in the first London Plan to no single policy apart from safeguarding wharves. This is a missed opportunity, and Londoners have suffered as the river has been hemmed in by luxury apartments and tall buildings hogging amenity. This also applies to canals, where a policy of river-based housing initiatives is needed.

GHR11 Cycle and car parking

There is inadequate cycle parking in developments, specifically a lack of provision for cargo bikes, including on streets. The growth of dockless cycle hire brings many benefits, but there is insufficient regulation of their use and their parking, which urgently needs addressing as these schemes inevitably expand. There is very poor integration between cycling and public transport, with wholly inadequate cycle facilities at stations (and dockless hire bikes banned from mainline station environs!). London needs better multimodal transport integration. New developments must continue to be conditional on cycle parking provision. There has been a shift from cycle ownership to hiring dockless bikes, but they still need to be parked away from pedestrian thoroughfares.

PV3 Town centres and High Streets

Evidence suggests that pedestrianisation generally increases footfall; businesses often overestimate the importance of car-borne customers, and the need for vehicles for businesses. Improvements for walking, cycling, and bus access can strengthen local economies. Examples include Lower Marsh (Waterloo), Essex Market, Herne Hill, Walthamstow. More evidence should be gathered on this.

Annex D: Transport interventions sets out a series of major transport projects, most of which have been proposed for many years. Many have been stalled due to lack of funds, caused by the impact of the pandemic on TfL capital reserves, a lack of government funding, and a lack of development contributions due to the slowdown in development.

Of the proposed transport schemes, costs and benefits are not presented, the projects lack clear evidence of deliverability, many schemes have no identified funding, the land requirements are not spelt out – including the freeing up of land from parking or redundant carriageway in LTNs – and are being promoted to unlock development rather than meet genuine (existing) transport need. Ultimately they create speculation and redevelopment pressures long before infrastructure actually arrives. We would like to see emphasis on modest schemes which have some chance of delivery in the next ten years. Transport schemes should be justified through social and economic benefits rather than solely through enabling development growth: the health benefits of active travel; the benefits of reduced congestion reducing pollution and improving efficiency; improved road safety; improved accessibility; and the economic and social impact of increased footfall in town centres and local centres.

Examples of development-led transport infrastructure interventions include the Bakerloo Line Extension, the DLR extension in Beckton/Barking, River crossings between Barking and Thamesmead/ Abbey Wood to create the 'City in the East', and the West London Orbital connections.

We prefer Improving Existing Transport Networks – repairing and upgrading existing infrastructure rather than focusing on expensive new projects. Piccadilly Line signalling upgrades, improving bus service frequency, repairing Hammersmith Bridge and Albert Bridge, better utilisation of existing rail corridors, and a general principle of maintenance and improvement must all come before expansion.