

Transport related policies in the draft London Plan

Response by Just Space www.justspace.org.uk

Just Space, a pan-London informal alliance of community groups, campaigns and concerned independent organisations, often working with the Bartlett School of Planning, aims to improve public participation in planning and make policy fairer towards communities in a system dominated by the interests of developers. This submission is the result of 3 years of consultation in preparation for the draft Plan, with the participation of dozens of groups, including three conferences and the production of an [Alternative London Plan for a Caring City](#).

We request to speak at the Examination.

Transport policy has been heavily rationalised and decentralised in the draft London Plan, with one main policy, MBUL5 Sustainable transport to enable London's growth, compared with nine policies in the current London Plan. Because transport-related matters arise throughout the draft London Plan rather than only in MBUL5, this response provides a comprehensive transport perspective to accompany Just Space's responses on individual policies.

We do not consider that the following policies identified within the draft London Plan are sound.

Overview:

Transport policy is seen throughout the draft London Plan as subservient to enabling housing 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

Transport should instead foster social cohesion and community wellbeing; support public health through walking, cycling and active travel; improve the affordability and accessibility of travel in London; and enable a more sustainable and less growth-dependent urban model.

The Mayor's strategic transport target—that 80 per cent of all trips in London should be made on foot, by cycle or by public transport by 2041—remains, but it appears only in the policy rationale rather than as a prominent policy requirement. The objective of reducing the need to travel has also receded and should be reasserted.

The draft London Plan should move beyond a growth-led model of transport planning and place health, climate resilience, accessibility, social cohesion and local economic vitality at the centre of transport policy. Stronger support for buses, active travel, orbital connectivity, safeguarded transport infrastructure and demand-reduction measures would create a transport strategy that better aligns with the Healthy Streets Approach, London's climate commitments and an updated Mayor's Transport Strategy.

The draft London Plan is unsound in respect of transport-related matters because it is not positively prepared, justified or effective, and is not consistent with national policy

- prioritises housing growth over transport need;
- does not reduce the need to travel;

- does not prioritise buses, active travel or road space reallocation;
- relies on unfunded major schemes;
- fails to protect rail freight land;
- is weak on aviation, safeguarding wharves and railway land, air quality and parking;
- and is not based on a transport strategy that is up to date.

The need for a transport strategy that is up to date is required by the NPPF, a requirement that is of more general application to other strategies that the Mayor is required to produce.

See: NPPF PM8: *Evidence for plan-making 1. All plans should be informed by a baseline understanding of the needs, opportunities, constraints and wider context of the area to which they relate. The preparation of plans should then be shaped and underpinned by information and data that is: relevant to the matters being considered in the plan; proportionate, so that it is focused and not unnecessarily extensive; and **drawn from suitable and reliable sources that are sufficiently up to date**.* [Just Space's emphasis].

The draft London Plan may be found not legally compliant in respect of transport-related matters because the Mayor has not demonstrated that it has been kept under review and revised as necessary in accordance with legislation.

See: GLA Act 1999 Section 41: General duties of the Mayor in relation to his strategies; which refers on to Section 142 and, among other things, the need to ensure that the strategy is consistent with national policies.

Note that this potential issue does not only relate to the transport strategy but to other strategies underpinning the draft London Plan.

Change Required

Transport investment should not be justified solely based on unlocking housing capacity or facilitating development. Transport schemes should be required to demonstrate benefits in terms of public health, carbon reduction, social inclusion, improved accessibility and reduced car dependency. This would align the Plan more closely with the Healthy Streets Approach and the Mayor's Transport Strategy. The Mayor should demonstrate that the Transport Strategy has been reviewed and is up to date.

Chapter 1: Overview of the Plan and Good Growth objectives

This part of the draft London Plan in respect of transport related matters is unsound for the following reasons. It is not

Positively prepared

- Transport is framed as subservient to housing growth, not as a means of meeting transport need, health, affordability, social cohesion or climate goals.
- Reducing the need to travel has faded away as an objective and should be reasserted.

- The Chapter does not identify key transport needs appropriately: bus decline, poor outer London coverage, unaffordable public transport, road danger, lack of accessibility, congestion and air pollution.
- The Mayor's 80% sustainable mode target appears only in the policy rationale rather than as a prominent policy requirement.

Justified

- No evidence is presented that a growth-led transport model is the most appropriate strategy.
- Reasonable alternatives — polycentric London, Lifetime Neighbourhoods, bus-first investment, demand reduction, improving existing networks before expansion — have not been assessed.
- The Chapter does not explain why transport policy has been heavily rationalised from nine policies in the current London Plan to one main policy (MBUL5).

Effective

- Delivery relies on major transport schemes that are unfunded or stalled.
- There is no mechanism to reverse bus cuts, improve bus speeds, reallocate road space or reduce car dependency.
- No monitoring framework is proposed for transport outcomes such as bus speeds, car kilometres, road casualties, air quality or accessibility.

Consistent with national policy

- The NPPF supports sustainable transport, healthy communities, climate action and reduced need to travel. The Draft Plan subordinates transport to housing growth and weakens demand-reduction objectives.

Transport policy has been heavily rationalised and decentralised in the draft London Plan, with one main policy (MBUL5) compared to the nine policies in the current LP. Reducing the need to travel has also receded as an objective and should be reasserted. Transport policy is presented throughout the draft London Plan as subservient to enabling housing growth. It 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. The Chapter is also inconsistent with the Mayor's Transport Strategy, which places sustainability and health at the centre of transport planning and targets 80% sustainable mode share by 2041.

Change Required

The policy framing should instead treat transport as a means of achieving health, accessibility, social cohesion, affordability, climate resilience and reduced inequalities. Restore the Mayor's 80% sustainable mode target to the policy box.

Alternatives should specifically include a polycentric pattern of Lifetime Neighbourhoods, stronger orbital connectivity, local access to jobs and services, and measures to reduce long-distance commuting.

Establish a monitoring regime covering progress towards the 80% sustainable-mode target, bus speeds and service levels, car kilometres, road casualties, air quality and accessibility.

MBUL1 Spatial strategy

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. 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, and the West London Orbital connections. The London Plan must actively reduce the need to travel by creating a truly polycentric city of Lifetime Neighbourhoods, where residents can access jobs, services, shopping, and leisure locally rather than travelling into central London.

A polycentric London would require better orbital transport links, faster and more reliable bus services, stronger active-travel networks and better links between town centres outside central London. The West London Orbital is viewed more positively than some radial rail projects because it supports this pattern of local and orbital connectivity.

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- The spatial strategy uses transport connectivity primarily to unlock development and increase densities rather than to meet existing transport need. This creates speculation and redevelopment pressures long before infrastructure arrives. The strategy also fails to prioritise the transport needs of disadvantaged communities and Outer London.

Justified

- The strategy is not supported by proportionate evidence on costs, benefits, funding or deliverability of major schemes.
- Alternatives such as a polycentric city of Lifetime Neighbourhoods, with better orbital links, local buses and reduced need to travel, have not been properly assessed. The strategy should enable residents to reach jobs, services, shopping and leisure facilities closer to home, reducing the need for long-distance commuting.
- It relies on development-led infrastructure examples such as the Bakerloo Line Extension, DLR extension, and river crossings without demonstrating that these are the best use of scarce resources.

Effective

- Land requirements for major schemes are not spelt out. Many schemes have no identified funding and have been stalled for years. The strategy is not deliverable over the Plan period.

Consistent with national policy

- The NPPF requires plans to reduce the need to travel and promote sustainable transport. The Draft Plan instead promotes growth-led infrastructure that may increase car dependency and congestion.

Change Required

Prioritise the transport needs of disadvantaged communities and Outer London. Assess alternatives based on a polycentric city of Lifetime Neighbourhoods, improved orbital connectivity, stronger local bus services and reduced travel demand.

MBUL2 Optimising the use of land and site capacity.

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- The Optimisation Framework sets minimum densities based on the Sustainable Access Measure (SAM), but does not adequately consider bus capacity, social infrastructure, local character, deprivation or car dependency.
- It does not identify the transport needs of existing communities or the need to reduce travel demand.

Justified

- The Framework uses a crude typology of London and access to public transport, with no consideration of demography and deprivation.
- Alternatives — such as maximum density limits linked to local conditions, Lifetime Neighbourhoods and social infrastructure — have not been assessed.

Effective

- Higher densities are not matched by funded transport improvements.
- Parking reductions are not linked to improvements in public transport provision.
- The Framework may increase pressure on buses and local roads without delivering mode shift.

Consistent with national policy

- The NPPF supports sustainable development, but over-density without transport capacity can undermine sustainable transport and health objectives.

A modal shift will not occur without reducing space devoted to cars. Policy is needed on the reallocation of road space away from private cars, and a reduction of parking provision. GHR11 Cycle and Car Parking is too supportive of the status quo. Parking reductions must be linked to improvements in public transport provision. There should be policy reducing residential parking standards over time; the introduction of workplace parking levies; and removing parking where it obstructs buses.

Change Required

Amend the Optimisation Framework to give greater weight to local context, social infrastructure, deprivation, bus capacity and transport accessibility. Link density and parking reductions to demonstrable improvements in public transport and active travel provision.

Identify the transport needs of existing communities and the need to reduce travel demand. Assess alternatives such as a polycentric city of Lifetime Neighbourhoods, with better orbital links, local buses and reduced need to travel.

MBUL5 Sustainable transport to enable London's growth

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- The policy fails to identify key transport needs appropriately: bus decline, outer London coverage, affordability, accessibility, road danger, health, social cohesion and climate.
- Transport is subordinated to housing growth.

- There is no target for reducing the need to travel nor for bus speeds, bus miles or bus priority.
- There is no policy for reallocating road space from private cars. There is no workplace parking levy. There is no requirement to reduce car dependency beyond general rhetoric.

Justified

- The policy is not the most appropriate strategy when considered against reasonable alternatives.
- Alternatives not assessed include bus-first investment, polycentric London, Lifetime Neighbourhoods, improving existing networks before expansion, demand reduction, road space reallocation and parking reform.
- Annex D lists major projects without costs, benefits, funding or clear evidence of deliverability. For each intervention, the Plan should provide clear implementation timescales and cost-benefit assessments, alongside funding, land requirements and deliverability evidence.
- Many schemes are promoted to unlock development rather than to meet genuine transport need.

Effective

- The policy is not deliverable over the Plan period.
- Many major schemes lack funding and have stalled due to pandemic impacts on TfL capital reserves, lack of government funding and lack of development contributions.
- Land requirements are not spelt out, including land freed from parking or redundant carriageway.
- There is no mechanism to ensure transport improvements arrive before development.

Consistent with national policy

- The NPPF expects plans to promote sustainable transport, reduce the need to travel, improve health and tackle climate change.
- The draft Plan places the 80% target in the policy rationale and fails to provide strong policy support for buses, active travel, demand reduction or road space reallocation.

Growth locations and Opportunity Areas should not be designated on the basis of hypothetical or unfunded transport schemes. Network planning should reconsider further development in persistently congested growth corridors unless adequate supporting infrastructure can be demonstrated. New development should be served by adequate public transport from first occupation, with enforceable phasing requirements; interim or pilot bus routes may be used to test demand but must not substitute for committed long-term provision.

Declining bus speeds are caused by congestion and insufficient priority; bus-priority interventions can improve speeds and reliability while also smoothing traffic flow. Measures include removing parking at congestion points, expanding bus lanes, giving buses priority at traffic signals and improving orbital services such as Superloop routes. Reliable passenger information should be provided at bus stops, including maintained countdown displays and clear departure information, so that access does not depend on owning or using a smartphone.

Transport schemes should be justified through social and economic benefits rather than solely through enabling development growth. Existing infrastructure should be repaired and upgraded before expensive new projects are pursued. Annex D sets out major transport projects, many stalled

through lack of funds; costs, benefits, identified funding, land requirements and clear evidence of deliverability are often absent.

Research cited by London TravelWatch suggests that a 10% increase in journey time can result in approximately a 6% decline in demand. Falling bus speeds, service cuts and poor coverage in Outer London risk reinforcing a cycle of decline. Improving bus performance through priority measures, traffic-signal prioritisation and stronger orbital services is essential to reducing car dependency.

Change Required

The evidence base should be updated rather than relying on an ageing strategic framework, and the Plan should explain the methodology, milestones and accountable delivery bodies by which the sustainable-transport target will be achieved.

Prioritise buses, active travel, orbital connectivity and maintenance of existing infrastructure; include stronger demand-reduction measures; require evidence of deliverability and funding; and ensure transport schemes are justified by health, social and environmental benefits as well as growth.

MBUL9 Healthy streets and public realm

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- Recognises the Healthy Streets Approach but does not require reallocation of road space from private cars. Does not prioritise buses nor does it link parking removal to bus priority or active travel.
- Participation and public engagement in controversial schemes such as LTNs, bus priority and parking removal are weak. Community engagement should include consideration of temporary or trial schemes before permanent implementation.

Justified

- Evidence on pedestrianisation, Mini-Holland, health benefits and footfall is not used to justify stronger policy. Alternatives — such as stronger road space reallocation, parking reform and bus priority — have not been assessed.

Effective

- No enforcement mechanism; no funding mechanism. No monitoring framework.
- Uses “should” rather than “must” where outcomes are essential.

Consistent with national policy

- The NPPF supports healthy communities and sustainable transport. The Draft Plan’s Healthy Streets policy is too weak to deliver these outcomes.

Active travel and road space reallocation deliver major health and social benefits, but a modal shift will not occur without reducing space devoted to cars. Evidence suggests that pedestrianisation generally increases footfall; improvements for walking, cycling, and bus access can strengthen local economies. Transport schemes should be justified through health benefits, reduced congestion and pollution, improved road safety and accessibility, and increased footfall in town centres.

In Inner London, around two thirds of households do not have access to a car, yet the car lobby continues to dominate the transport agenda. Engagement processes should therefore ensure that residents who walk, cycle or rely on public transport are properly represented. Communities need to

be better engaged when proposing controversial schemes such as LTNs, bus priority measures, parking removal and road reallocation; temporary and trial schemes can help communities experience benefits directly.

Evidence from London's Mini-Holland programme demonstrates significant increases in walking and cycling where high-quality infrastructure is introduced. Residents in areas receiving major investment were found to be 24% more likely to cycle and recorded substantially higher levels of active travel than comparison areas.

Require cycle routes, bus stops and general traffic movements to be designed as one continuous system. Discontinuous cycle lanes and layouts that require passengers to cross cycle tracks when boarding or leaving buses can create conflict and road danger. Before approving schemes, boroughs should demonstrate safe interchange design, route continuity and accessibility, with the necessary infrastructure delivered up front rather than deferred in reliance on later planning gain.

Change Required

Strengthen the policy by requiring an all-mode integrated planning process for the formulation of transport projects, road-space reallocation, bus priority and parking reform where appropriate. Improve community engagement, including trial schemes where suitable, and establish clear delivery, funding and monitoring mechanisms.

GHR11 Cycle and car parking

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- The policy is too supportive of the status quo. It does not provide adequately for cargo bikes, adapted cycles or dockless cycle hire; it does not sufficiently regulate dockless cycle-hire parking; and it does not integrate cycling with public transport.
- Parking reductions are not linked to improvements in public transport provision. There is no policy to reduce residential parking standards over time. There is no workplace parking levy. There is no policy to remove parking where it obstructs buses.
- It does not address significant differences between Inner and Outer London.

Justified

- The policy is not supported by proportionate evidence on parking, cycling or mode shift.
- Alternatives — such as maximum parking standards, workplace parking levies, reallocation of street space and better cycle parking — have not been assessed.
- Lessons from the ULEZ roll-out from Inner to Outer London are not used.

Effective

- No delivery mechanism for reallocation of road space. No enforcement mechanism and no monitoring framework for cycle parking, dockless cycle hire or parking reduction.

Consistent with national policy

- The NPPF supports sustainable transport and reduced car dependency. The Draft Plan fails to provide strong enough policy to achieve this.

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 parking. There is very poor integration between cycling and public transport, with wholly inadequate cycle facilities at stations. GHR11 Cycle and Car Parking is too supportive of the status quo. Parking reductions must be linked to improvements in public transport provision, with residential parking standards reduced over time, workplace parking levies introduced, and parking removed where it obstructs buses.

There are significant differences between Inner and Outer London in car use and public transport connectivity, so parking and mode-shift policies cannot be progressed through a one-size-fits-all approach. The successful roll-out of the ULEZ from Inner to Outer London may provide useful lessons for phased implementation.

Car clubs can reduce car ownership and free street space for other uses. Collaborative Mobility UK reports that one car-club vehicle can replace between 14 and 32 privately owned cars. However, Zipcar's withdrawal from the UK market reduced the number of car-club vehicles available in London from approximately 2,800 in late 2025 to 226 in early 2026—a reduction of about 92%. The draft London Plan should recognise the benefits of car clubs and include measures to reverse this recent contraction.

Integration between cycling and public transport is further weakened by wholly inadequate cycle facilities at stations and by dockless hire bikes being excluded from mainline station environs. Better multimodal integration requires secure and suitable cycle facilities at stations together with practical access arrangements for shared cycles.

Change Required

Strengthen cycling, shared mobility and parking policies through improved provision for cargo bikes, adapted cycles, dockless cycle hire and car clubs; better integration with public transport; progressive reductions in parking standards; workplace parking levies where appropriate; and measures to remove parking that obstructs buses. [Shared mobility includes car clubs].

GLE9 Aviation

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- The policy fails to define “unacceptable impacts”. It allows expansion if a balanced judgement finds impacts acceptable.
- It does not account for UK Climate Change Committee advice that Heathrow expansion is not currently compatible with the UK's Net Zero trajectory. It does not address the fact that aviation emissions have more than doubled since 1990 while wider economy emissions have fallen substantially.
- It does not assess whether increased airport capacity primarily supports leisure travel or whether the claimed economic benefits would be realised and distributed within London,

particularly where expansion supports Heathrow's hub function and passengers interchange rather than enter London.

- The drones policy is weak and vague. Concerns about noise, privacy, visual intrusion, security and large-scale delivery networks are not adequately addressed.

Justified

- No evidence is presented that expansion is necessary or beneficial. The policy should set out how climate and transport impacts will be assessed and define clear thresholds for when impacts are unacceptable, rather than relying on an undefined balancing exercise.
- Alternatives — such as opposing expansion, repurposing airport land for sustainable development, and limiting drones to medical or emergency uses — have not been assessed.

Effective

- No delivery mechanism to oppose expansion. No monitoring framework for aviation emissions, noise or air quality.

Consistent with national policy

- The NPPF supports climate action, health and environmental protection. The Draft Plan is inconsistent with these objectives.

GLE9 Aviation places conditions on airport expansion by requiring proposals to demonstrate that they would not cause unacceptable environmental, transport or congestion impacts. However, because “unacceptable impacts” is not defined, the policy still permits expansion through an uncertain balancing exercise. 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 aviation emissions have more than doubled since 1990 while emissions from the wider economy have fallen substantially.

There is widespread opposition to airport expansion because of its climate impacts and concern that increased capacity primarily supports leisure travel without delivering corresponding economic benefits. This concern is particularly relevant where expansion supports Heathrow's hub function and passengers interchange rather than enter London.

Drones raise concerns about noise, privacy and visual intrusion, security, and large-scale delivery networks; there is support for limited medical or emergency uses, but opposition to widespread commercial deployment without stronger safeguards. Any policy for delivery drones or other advanced air mobility should address the complete operating chain, including the location and planning status of docking and transfer sites, the last-mile journey to the recipient, interaction with streets and buildings, cumulative noise and disturbance, safety, privacy and management of operations in a 24-hour economy. Limited hospital or emergency-service trials do not provide sufficient evidence for city-wide commercial deployment.

Change Required

Define clear thresholds for unacceptable environmental, climate and transport impacts, strengthen opposition to airport expansion that is inconsistent with climate objectives, and introduce stronger safeguards governing drone operations, noise, privacy and visual intrusion.

GLE10 Safeguarded wharves

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- The policy supports wharves but fails to promote river-based transport for construction materials and waste. It does not adequately retain river infrastructure for sustainable logistics.
- The Thames's spatial impact on movement, amenity, heritage and identity has been gradually removed from the London Plan.
- There is no single policy for the Thames apart from safeguarding wharves.
- Canals need a policy for water-based housing initiatives.

Justified

- No evidence is presented on how wharf capacity meets sustainable logistics needs.
- Alternatives — such as greater emphasis on river-based transport and retention of river infrastructure — have not been assessed.

Effective

- No delivery mechanism to retain river infrastructure. No policy for construction and waste by river.

Consistent with national policy

- The NPPF supports sustainable transport and freight. The Draft Plan is weak on river freight and waterways.

GLE10 Safeguarded Wharves provides a useful basis for protecting wharf capacity, but it is not sufficient to meet sustainable logistics needs. Greater emphasis is needed on river-based transport of construction materials and waste, supported by the retention of river infrastructure. River transport remains underused and should form part of a sustainable logistics strategy. The London Plan has also progressively lost recognition of the Thames's role in movement, amenity, heritage and identity. This is a missed opportunity that extends to canals, which also require an appropriate policy framework for water-based housing initiatives.

Waterborne freight policy should distinguish strategic benefits from local impacts. Reintroducing large cargo movements on canals may create noise, night-time disturbance and conflicts with residential and recreational uses; route, operating-hour, handling and mitigation requirements should therefore be assessed alongside freight-capacity objectives.

The loss of a coherent Thames policy has also allowed the river to be hemmed in by luxury apartments and tall buildings that dominate riverside amenity. A renewed spatial policy should protect the Thames and canals as transport corridors and as shared assets for movement, amenity, heritage and identity.

Change Required

Strengthen support for river-based freight, construction and waste transport, retain river infrastructure for sustainable logistics, and introduce a broader Thames and waterways policy recognising their transport, environmental, heritage and placemaking functions.

GLE2 Supply of industrial land and PV5 Industrial land supporting housing growth

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- Release of industrial land for housing undermines rail freight and logistics. It pushes warehouses and logistics further out of the city, forcing freight onto roads and increasing mileage and emissions.
- A “no net loss” policy is not applied to Strategic Industrial Land (SIL) and Locally Significant Industrial Sites (LSIS) with rail freight or wharf access (canal and river).

Justified

- No assessment of alternative uses. No evidence that release will meet housing need.
- No consideration of freight capacity or the climate impact of increased road freight.

Effective

- Not deliverable sustainably. Increases road freight, congestion and air pollution. Contradicts climate and air quality objectives.

Consistent with national policy

- The NPPF supports sustainable freight and transport. The Draft Plan is inconsistent.

Currently redundant railway land must be safeguarded for future use, particularly operational rail corridors and strategic transport land. Rail land is often sold for development and later found to be needed for future transport projects. River infrastructure also needs to be retained so that construction materials and waste can be transported by river as part of a sustainable logistics strategy.

Just Space members have fought for several years to protect currently unused North London line trackbeds across the London Borough of Camden. The 'London Rail Freight strategy' document of May 2024 describes how it is required by Transport for London for future expansion of London Overground services between Stratford and Camden Road station. The London Borough of Camden and one local community group wanted to replace it with the 'Camden Highline', (like the New York Highline), something that inevitably would be a permanent loss to the railway network.

Elsewhere, just south of Willesden Junction station, in the London Borough of Hammersmith and Fulham (moved from the London Borough of Ealing in 1993), the 'South-West Sidings' are unused railway operational land.

The new London Plan must protect sites like this from development. Over coming decades, locations like this will feasibly be needed for future transport projects.

One possible use for the sidings is as the railway maintenance depot for the 'West London Orbital' project. But in any case, the site needs protection for the future, if that scheme does not need the land.

Change Required

Apply stronger protection to industrial land with freight, rail or wharf functions, safeguard redundant railway land for future transport use, and require assessment of freight, logistics and climate impacts before industrial land is released for housing.

Protect rail freight land more generally, including all currently-unused operational railway land.

GHR10 Air quality

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- Transport emissions are not sufficiently addressed. There is no car kilometre reduction target.
- There is no diesel-free date. Bus decline and congestion harm air quality.
- The Plan does not identify the key air quality needs of disadvantaged communities.

Justified

- No evidence is presented that the current approach will meet WHO air quality guidelines.
- Alternatives — such as demand reduction, bus priority, road pricing and parking reform — have not been assessed.

Effective

No delivery mechanism, or monitoring framework for car kilometres or transport emissions.

Consistent with national policy

- The NPPF supports air quality improvement. The Draft Plan is too weak.
- Private cars reduce public health through inactivity and poorer air quality, increase congestion, and impede public transport. Bus-priority measures can improve speeds and reliability while smoothing traffic flow. Reduced congestion can lower pollution, improve efficiency and support better road safety and accessibility.

Change Required

Introduce stronger measures to reduce transport emissions, including demand reduction, bus-priority measures, parking reform and reductions in car dependency. Establish monitoring and targets for transport-related emissions, congestion and air-quality outcomes.

PV3 Town centres and high streets

This policy in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- Evidence on pedestrianisation increasing footfall is not used. Businesses often overestimate the importance of car-borne customers. Improvements for walking, cycling and bus access can strengthen local economies.
- The policy does not require pedestrianisation, bus priority or parking removal in town centres.

Justified

- No assessment of pedestrianisation alternatives. No evidence gathering on the economic benefits of reduced car dominance.

Effective

- There is no delivery mechanism, funding provision or monitoring framework.

Consistent with national policy

- The NPPF supports town centres and sustainable transport. The Draft Plan is too weak.

- 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 and Walthamstow. More evidence should be gathered on this.

Change Required

Support pedestrianisation, improved walking and cycling access, bus priority and reduced car dominance in town centres where appropriate. Strengthen the evidence base on economic benefits and establish delivery and monitoring arrangements to support implementation.

Annex D Transport interventions

This part of the draft London Plan in respect of transport related matters is unsound for the following reasons: it is not

Positively prepared

- Lists major transport projects without costs, benefits, funding or clear evidence of deliverability.
- Land requirements are not spelt out.
- Schemes are promoted to unlock development, creating speculation and redevelopment pressures long before infrastructure arrives.
- It does not prioritise improving existing transport networks.

Justified

- No evidence that these are the most appropriate schemes. Project appraisal should include cost-benefit evidence and implementation timescales and demonstrate that schemes meet identified transport needs and social objectives.
- Alternatives — such as repairing and upgrading existing infrastructure, improving bus frequency, repairing Hammersmith Bridge and Albert Bridge, better utilisation of existing rail corridors, and maintenance before expansion — have not been assessed.

Effective

- Many schemes have been stalled for years. No identified funding. Undeliverable over the Plan period.

Consistent with national policy

- The NPPF requires plans to be deliverable. The Draft Plan's Annex D is not.

Annex D sets out a series of major transport projects, most proposed for many years and many 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. Costs and benefits are often not presented; projects lack clear evidence of deliverability; many have no identified funding; and land requirements are not spelt out. Schemes are being promoted to unlock development rather than meet genuine transport need and create speculation and redevelopment pressures long before infrastructure arrives.

An exception is the proposed West London Orbital, which would repurpose existing freight lines for passenger services, improve connections between communities across north-west and south-west London, and may offer comparatively strong benefits at a reasonable cost.

The interventions programme should give greater weight to links between outer-London centres rather than describing need only through radial routes. It should assess extensions to the existing tram network and other feasible orbital connections against clear evidence of existing need, while safeguarding railway land and depot capacity for future service expansion.

Existing transport networks should be repaired and upgraded before expensive new projects are commissioned. Priorities should include Piccadilly line signalling upgrades, increased bus frequencies, repairs to Hammersmith Bridge and Albert Bridge, and better use of existing rail corridors, reflecting a general principle of maintenance and improvement before expansion.

Change Required

Require all major transport schemes to demonstrate costs, benefits, funding sources, land requirements, implementation timescales and deliverability. Prioritise maintenance, renewal and more effective use of existing infrastructure before expansion schemes are pursued.