

Is the change to Objective 5, 5th bullet, justified?
(From ‘Minimise the need to travel and the growth of journey lengths’ to
‘Reduce the need to travel by car and the growth of journey lengths’)

Introduction

1. The London Plan is required to help deliver “a reduction in the need to travel, especially by car” in order to be consistent with statements of national policy including PPG 13, and GOL Circular 1/2000 ‘Strategic Planning in London’. (PPG 13 paragraph 4 and GOL Circular 1/2000 paragraph 3.6).

2. The proposed alteration of the London Plan does not conform to national policy in that it applies only to travel by car.

“Reduce the need to travel by car and the growth of journey lengths”
(4th key policy direction under Objective 5 in the draft alterations to the London Plan, page xxiii).

National policy is not to reduce the need to travel by car. It is to reduce the need to travel in general and by any mode of transport but especially by car.

3. The proposed alterations to the London Plan would also dilute this policy in other important respects (see below). In any case neither the 2003 London Plan nor the proposed alterations show how reducing the need to travel is to be achieved. The general thrust of Plan policies and alterations, is to facilitate travel and increase mobility rather than to improve accessibility and reduce the need to travel.

4. Transport and land use planning are poorly integrated in the London Plan, and in the proposed alterations, particularly in regard to the location of jobs and housing. In consequence the overall effect of the Plan, especially in the proposed alterations, is to increase journey lengths and accommodate a large overall increase in travel above the increase that will occur as a result of growth in population and jobs.

5. Reducing the need to travel and the lengths of journey are necessary in order that policies in the London Plan to promote walking and cycling can be properly effective. They also part of, and essential to, the Climate Change Action Plan and TfL’s strategy for meeting London’s transport needs which is set out in Transport 2025.

Reducing the need to travel and the London Plan

6. Attempting to avoid including reducing the need to travel as a principle of the London Plan has been part of the history of the Plan as it went through its first draft stage and Examination in Public. Arguing that reducing the need to travel should be a fundamental part of integrated transport and land use planning was a major part of the evidence that Transport 2000 and others submitted to the EiP in 2003. Our arguments were endorsed by the Panel Report published in July 2003 after the EiP of the draft Plan.

7. The Panel Report confirmed that reducing the need to travel and reducing the length of journeys are “sustainable development aims firmly supported by Government policy guidance.” The report observed that “there is no assessment of what influence the chosen strategy will have on travel behaviour, and whether it would be more sustainable in this respect than alternatives.” It continued “From our examination of TfL’s analyses it became apparent that a substantial increase, of the order of 25% in the overall propensity to travel and 13% in average journey lengths, is anticipated over the period to 2016. There is no indication, either from the draft Plan documentation or from the discussion at the EiP, how far this results from sustainable policy choices made in the draft Plan, or whether it had even been thought about.” (all references are from paragraph 1.30)

8. The transport chapter of the Panel Report began with a consideration of reducing the need to travel. On the matter of “better integration between land use and transport planning” it expressed concern that the draft Plan did “not start from an identification and prioritisation of movement needs and the best way of meeting them”. “The starting point for any assessment” it said “must be the need to travel.” (paragraph 5.3).

9. The Panel Report then stated that the “draft Plan will increase the propensity of Londoners, and those commuters travelling within London, to travel.” It noted again that TfL had confirmed an increase of 13% in the average trip length per person in the morning peak by 2016, and in a 25% increase in total person kilometres. The report concluded that the strategy should give greater weight to the national policy of reducing the need to travel. The Panel’s first recommendation on transport was therefore that “Policy 3C.1 be amended by the inclusion of an additional bullet point, *to go first in the list*, which would encourage proposals and forms of development which reduce the need to travel.” (Our emphasis) It also recommended “the inclusion of an additional bullet point to Objective 5 aimed at reducing the need to travel.” (All references from paragraph 5.5.)

10. The London Plan, as published in February 2004, accepted the Panel’s recommendation and included the aim of reducing the need to travel in Objective 5 and in Policy 3C.1. However the general policy thrust of the London Plan has not been altered to make clear how this would be achieved. The general thrust remains, not reducing the need to travel, but making travel more necessary and facilitating travel. The overwhelming majority of the key policy directions of **Objective 5: to improve London’s accessibility** are concerned not with improving accessibility but with increasing mobility.

11. It is now proposed in the draft alterations that the London Plan should retreat even from this unsatisfactory position. Important examples include:

- In Objective 5 the key policy direction of “minimising the need to travel and the growth of journey lengths” is to be diluted and qualified in the proposed replacement “to reduce the need to travel **by car** and the growth of journey lengths” (page xxiii of the Draft Further Alterations to the London Plan)
- The undertaking to “contain” levels of commuting and “achieve as much local and regional self-sufficiency as possible” is to be removed. (paragraph 1.17)

- The commitment to “ensuring that development occurs in locations that are accessible to town centres, employment, housing, shops and services” is to be replaced with one that ensures development occurs in the Opportunity Areas. (see Policy 2A.1, 5th bullet)
- The commitment to “reducing the overall need to travel by providing improved local connections by walking, cycling and more sustainable modes of transport” is to be removed. (see paragraph 3.164).

12. It is unacceptable that it should be again necessary to make the case for reducing the need to travel. The Panel will note that the central transport recommendations of the Panel Report on the draft London Plan are not just being ignored but that proposed alterations are moving in the opposite direction.

13. The forecast growth in travel and in the need to travel appears to be at least as severe a problem now as it was at the time of the last EiP in 2003. The population of London is predicted to grow by 11% between 2005 and 2025. In TfL’s Reference Case scenario for 2025, which includes TfL’s investment programme to 2010, it is predicted that the total number of journeys will grow by 15%. (all figures from Transport 2025, TfL, 2006) The national trend over a long period has been for average journey lengths to increase. (We have not yet been able to find forecasts for total travel growth, average journey length or per capita travel. These would obviously be helpful.)

14. The view of the Mayor’s office appears to be that

- growth in the London economy depends largely on growth in financial and business services sectors
- financial and business services sectors wish to locate mainly in an east-west central London corridor and not in outer London
- new housing will be more widely distributed with most of it located around outer London and in east London
- additional travel will occur between the new jobs and the new housing
- this is acceptable if most of the additional travel is by public transport and carbon emissions from transport can therefore be constrained.

15. Transport 2000 has a number of concerns about this stance.

- The reasons why business wishes to locate in central London and not in other London town centres need to be examined and the potential to change this should be assessed. Proper consideration needs to be given to locating more jobs in and around outer London town centres and nearer to residential areas.
- Though better than car travel, even travel by public transport produces substantial carbon emissions. The Mayor’s Climate Change Action Plan states that average CO2 emissions in grams per passenger kilometre are 110 for car, 80 for bus, 60 for rail and 50 for underground and light rail.
- The number of journeys that can be made on foot and by bicycle cannot be maximised if journey lengths are increased. There is therefore a conflict between London Plan policies which will increase the need to travel and journey lengths and those which seek to promote walking and cycling.

16. We are also concerned that London boroughs continue to be exempt from the requirement to carry out accessibility planning which was made a requirement on

local authorities outside London following the publication of the Social Exclusion Unit's 2003 report '*Making the Connections: Final Report on Transport and Social Exclusion*'. This report sought to promote accessibility which is also the aim of the London Plan Objective 5. It used a definition of accessibility which is not just about providing transport to enable people to reach facilities but also locating employment, services and facilities so that people do not need to travel far to reach them.

'The key idea at the centre of this report is accessibility: can people get to key services at reasonable cost, in reasonable time and with reasonable ease?

Accessibility depends on several things: does transport exist between the people and the service? Do people know about the transport, trust its reliability and feel safe using it? Are people physically and financially able to access transport? Are the services and activities within a reasonable distance? Solving accessibility problems may be about transport but also about locating and delivering key activities in ways that help people reach them.'

(Summary, page 1. Photocopy submitted to C.D.L.)

17. *Transport 2025*, published by TfL in November 2006, identified six strategies for overcoming constraints on London's system and enabling the needs of an expanded population and economy to be met while meeting emission reduction objectives. The third of these is reducing the need to travel. (See page 55). In *the Mayor's Climate Change Action Plan* reducing the need to travel is one of the actions that will have a "significant bearing" on necessary changes in the way we travel if carbon reduction targets from transport are to be met. (see page 138)

18. If the London Plan is actually to improve accessibility and reduce the need to travel it must show how this is to be achieved and have policies to bring jobs, services and amenities nearer where people live.

Recommendations

19. The key policy directions in Objective 5 should include the means of reducing the need to travel and the growth of journey lengths. In other words they should set out the means of improving access, which is the aim of Objective 5, not mobility.

20. Policies for the location of jobs and housing should promote a balance of jobs and homes across the London area.

21. Alterations to the London Plan should include the introduction of a process of accessibility planning to ensure that services and amenities including jobs and public transport are available near where people live and can be reached on foot and by bicycle.

Conclusion

22. The proposed alteration to Objective 5 is not justified.