

A new plan for London – Proposals for the Mayor’s London Plan ~ Response from the Campaign for Better Transport

MAIN CONCERNS

Climate Change

The role of transport in generating carbon emissions is not recognised (except in the section on minerals) and it is not explained how planning policies could help reduce carbon emissions from transport.

Accessibility and reducing the need to travel

The transport objective of making London ‘A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities’ is welcome and is completely consistent with the aim of reducing the need to travel. The spatial policies that will achieve this should be explicit and set out in the London Plan.

Planning for traffic avoidance and reduction

Reducing the proportion and amount of travel by car is necessary to meet environmental, health and climate change objectives. Planning for traffic avoidance and reduction must permeate the London Plan as a planning perspective.

Planning for the public realm

Planning for a healthy population means having a policy for the public realm. The London Plan should define the public realm and say why it is important. It should contain policies for creating a sustainable public realm which meets social and health objectives recognising, for example, the needs of children for play or independent travel. The car accounts for only 42% of trips in London (27% in inner London)¹. Streets and public spaces should reflect this and not be dominated by cars.

Not just for new development

The impact of London Plan policies will be very limited if they apply only to new development. Many policies, for example in ensuring accessibility, reducing the need to travel and improving the public realm, should apply to existing development.

Density standards

These are important aspects of integrated transport and land use planning but no indication is given that they will be included in the London Plan.

A new approach to road schemes

New roads are not an effective means of relieving traffic congestion particularly in urban areas. Any new criteria for road schemes should reflect this and include a strong requirement for environmental improvement.

Parking

Stronger parking standards to prevent car dependent development should be included in the London Plan

¹ Travel in London, TfL, 2009

ABOUT CAMPAIGN FOR BETTER TRANSPORT

Campaign for Better Transport is the leading transport NGO. Our compelling arguments and ideas have won us the support of national decision-makers and local activists, enabling us to secure transport policies and programmes that improve people's lives and reduce environmental impact.

OUR RESPONSE

The rest of our comments follow the structure of *A New Plan for London* and are confined to transport and related matters.

CHAPTER ONE – PLANNING FOR A CHANGING LONDON

Para. 8 This chapter notes that the London Plan should take account of the three cross cutting themes of economic development, social development and improvement of the environment. It should also have regard to health promotion, climate change and its consequences and achieving sustainable development. All three could be addressed by reducing traffic. See for example the London Health Observatory on the health benefits of traffic reduction².

Para. 49 In discussing the need to mitigate future climate change, a *New Plan for London* mentions promoting patterns of development that reduce the need to travel by less environmentally-friendly modes of transport but it does not explain here or elsewhere in the document what those patterns of development (or any other measures to reduce the need to travel) might be. This is a serious omission but even more seriously the role of transport in generating carbon emissions, and the role that transport must play in reducing emissions, are not mentioned either here or in Chapter 5 – London's Response to Climate Change.

Para. 60 The document refers to the need for the London Plan to take account of the the Government's move towards new development being zero carbon. See our proposal for exemplars of low car-dependency development referred to below.

Para. 65 The transport objective of making London 'A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities' is welcome. The wide definition of accessibility is a significant improvement over the narrower view used in previous Mayoral strategies. But, again, the means of promoting accessibility are not explained. The Statement of Intent for the Mayor's Transport Strategy says that a draft accessibility plan will be prepared alongside the public consultation draft of the Transport Strategy but many of the necessary policies are spatial and should be set out in the London Plan. They should at least be mentioned in these proposals but they are not.

CHAPTER 2 – LONDON'S PLACES

Outer London

Para. 82-84 We welcome the attention now being paid to policies for outer London. With Living Streets and the London Cycling Campaign, Campaign for Better Transport submitted evidence to the Outer London Commission³, set out our views on several subjects of importance to transport in outer London including:

- Reducing the need to travel and journey lengths through co-ordination of transport and land use planning thus promoting walking and cycling
- The importance of town centres and neighbourhood centres in providing services and facilities accessible by local public transport and on foot and by bicycle
- The need for parking standards to reduce parking provision in order, for example, to promote vitality of town centres, discourage car dependant development and restrain car use

In additional evidence to the Outer London Commission we proposed that exemplars of low car-dependency development be established in outer London⁴.

² http://www.lho.org.uk/HIL/Determinants_Of_Health/Transport.aspx.

³ <http://www.bettertransport.org.uk/system/files/submission-london-transport-agenda-may2009.pdf>

⁴ Ibid.

Opportunity and Intensification Areas

Paras. 89-97 The Mayor has said that “We must not create new communities that have to be dependent on the car.” (Planning for a Better London). However we can already see that some development schemes threaten to be very car-dependent (the proposals for Brent Cross/Cricklewood, for example, include 12,000 car parking spaces). The means of avoiding this include the use of parking standards, street design which encourages walking and cycling and ensuring that sites are not occupied until well served by public transport.

Town Centres

Para. 94 We agree with the proposal to focus more strongly on town centre development and on the control of inappropriate out of centre development (which we take to mean travel-generating, commercial development with large amounts of free, or low-cost, parking).

Our submission to the Outer London Commission summarised some of the considerable evidence, from TfL and others, that the importance of car-borne custom to town centre businesses is overrated and the importance of customers who arrive on foot, by bicycle and by bus is correspondingly underrated. It also cited evidence that improving the quality of the public realm and conditions for pedestrians and cyclists in town centres benefits town centre vitality and turnover. Town centre policy in the London Plan should reflect this.

Neighbourhood centres

Policy should focus on the health and development of neighbourhood centres as well as town centres. These are often the appropriate location for community, social and retail facilities which can be accessed on foot and by bicycle from the surrounding residential areas. (see our evidence to the Outer London Commission).

CHAPTER 3 – LONDON’S PEOPLE

Para. 123 We welcome the proposed emphasis on provision of social infrastructure as the glue that binds local communities and makes for sustainable neighbourhoods. Social infrastructure should include retail facilities. This is a basic building block in reducing the need to travel. The transport implications (locating facilities close to where people live so that they are accessible and can be reached as much as possible on foot and by bicycle) should be explicit. In working with strategic health, social and educational organisations the Mayor should require that transport implications be taken into account in decisions about the location of facilities.

A New Plan for London states that the Mayor proposes to ensure that new development builds a healthy city and fosters healthier lifestyles. This should include creating conditions and development patterns which encourage active travel.

CHAPTER 4 – LONDON’S ECONOMY

Supporting retail, town centres and town centre development

Para. 142 We agree that the availability and accessibility of local shops is an important aspect of ensuring “lifetime neighbourhoods” and support the proposal to improve the network of town centres so that people have ready access to the goods and services they need. Policies should state that this is an important part of creating the development pattern that reduces the need to travel and promoting sustainable travel patterns.

CHAPTER 5 – LONDON’S RESPONSE TO CLIMATE CHANGE

It is notable that despite the Mayor’s avowed commitment to making London a world leader in tackling climate change, the only mention of the contribution that transport makes to climate change is under the heading of ‘minerals’ and no mention is made at all of the contribution that the transport sector must make to the reduction of climate change emissions. None of the Mayor’s proposals in reviewing the London Plan (set out after para. 151) address the carbon emissions from transport. Yet ground-based transport accounts for 22% of all CO₂ emissions in London, of which 49% is from cars and motor-cycles and 23% from road freight.

It is not enough to say, as does *A New Plan for London* in para. 149, that the Mayor's Transport Strategy 'will deal with the mitigation and adaptation issues surrounding transport'. The London Plan must recognise the need for traffic avoidance and reduction and set out the spatial framework that would allow this to occur (though other measures would also be required). These include for instance:

- Measures to reduce the need to travel and journey lengths so that fewer trips are made and more can be made on foot and by bicycle
- Making parking standards and their enforcement more rigorous
- Improving the public realm to make walking and cycling safer and more attractive
- Ensuring that development only occurs where it is well served by public transport and that public transport is available before the development is occupied

CHAPTER 6 – LONDON'S TRANSPORT

Para. 161 The overall transport objective is excellent: "A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system, which places more emphasis on walking and cycling" etc.

This objective clearly suggests the need for policies not simply to ensure that transport is available to take people to the jobs, services and amenities they need to reach, but also that jobs, services and amenities should be located as much as possible where they can easily be reached. In other words the objective implies policies to reduce the need to travel.

Para. 163 We agree that the best option is to reduce the need to travel. This should not be qualified with the words 'longer distances'. Of course policy should seek to reduce journey lengths if promoting walking and cycling and reducing carbon emissions, among other things, are policy aims (as they are). But in some cases journeys can be avoided altogether with benefits for quality of life.

Having made reducing the need to travel an aim of coordinated spatial and transport planning, the London Plan should set out the specific policies by which this aim can be realised otherwise the aim will be meaningless. The London Plan of 2008, also included an aim of reducing the need to travel (after it was pointed out by the Inspectors at the Examination in Public that it was required by national policy to do so) but its policies often have the opposite effect and, we would argue, are therefore still in breach of national policy. The new London Plan must avoid this failing. Various means of reducing the need to travel were set out in our evidence to the Outer London Commission⁵.

Para. 166 & 167 We agree that the hidden costs of transport must not be overlooked. Transport's contribution to carbon, air and noise pollution and its impact on health are well documented. Its damaging impact on the quality of life, the streetscape and public realm is less recognised. The current volume of car and commercial traffic must be recognised as a cause of this impact and the reduction of traffic as a necessary means of tackling it. Traffic reduction policies and targets should be included in the London Plan.

Transport and spatial development integration

Para. 166 (misnumbered) and 169 We support the emphasis placed on coordination of transport and land use planning. The London Plan policies should ensure that:

- Development only occurs where it can be served by public transport
- Occupation of a development should not begin until public transport is in place.

In the short to medium term it is unlikely that funding will be available for major new public transport projects. Therefore new development should be located on the public transport network that already exists or is planned and funded.

⁵ Ibid

New development should also conform and contribute to a development pattern in which most services and amenities are available within walking and cycling distance of where people live, public transport is readily available and most journeys can be made by other means than the car. Such a development pattern already exists in much of the ring of 19th century, higher density but low rise, development of inner London (in parts of Camden, Hackney and Lambeth for example) where the car accounts for only 27% of trips by residents and a majority of households do not own a car, often out of choice. There are areas of such development in outer London. The London Plan should contain policies to encourage

- Higher density development
- Car free development where people can choose to live in areas where the street space is not dominated by parked or moving cars
- Car clubs and residential or neighbourhood travel plans.

Campaign for Better Transport published a report in 2008 the *Masterplanning Checklist for Sustainable Transport in New Developments* which set out the planning factors which enable less car dependent travel patterns⁶. These factors apply equally to existing built areas.

More attention should be drawn to development patterns of inner London and to the fact that in many respects they allow transport conditions which, if replicated would do much to address transport problems (though roads in inner London are still dominated by traffic much originates elsewhere, is commercial or is caused by a minority of journeys of inner London residents). We have submitted a proposal for transport exemplar developments in outer London as part of our evidence to the Outer London Commission. We suggest that our transport exemplar proposal be endorsed in the London Plan.

Connecting London

Para. 170 We support the proposal for high quality strategic rail connections in London and oppose the claim that additional runway capacity is needed. Rail travel should replace domestic air travel and make increased rail capacity unnecessary. A Thames Estuary airport has no significant political support and would provoke widespread environmental and other opposition. We welcome Mayoral opposition to expansion of Heathrow but policy in favour of additional airport capacity should be abandoned.

Public transport

Para. 171 Our only comment on this section is that the statement that public transport “provides access for many people unable to travel by car” is distasteful and misleading. It implies that the car is naturally the first choice of travel mode, public transport is only used by people who have no alternative and that people who use public transport do not choose to do so, all of which are untrue. We should be proud of having a public transport system that is used by people from all walks of life. This sort of statement should not be in the London Plan.

Reducing congestion and making better use of London’s streets

A new approach to road schemes. We are wary of any change of policy which would make it more likely that new road schemes will be approved. A cross-party consensus has existed for some time against road building in London. Moreover the conditions mentioned as part of a possible new approach for road schemes do not include a requirement for environmental protection unlike the criteria in Policy 3C16 of the current London Plan. However, we have not seen any new criteria for road schemes and it is possible that they would make the conditions for new roads more not less demanding.

Parking

Para. 174 We are aware of no evidence that the provision of parking helps promote viable development in town centres. On the other hand there is a large body of evidence that:

- A high quality public realm, particularly greater pedestrian priority, improves retail performance

⁶ [Masterplanning Checklist executive summary.pdf](#)

- Shop owners overestimate the importance to their businesses of car-borne custom and underestimate the importance of customers who arrive on foot, by bicycle and by public transport
- Poor public realm and heavy motor traffic is associated with poor retail performance

This and other evidence is summarised in our evidence to the Outer London Commission. It strongly suggests that measures to reduce parking provision are consistent with efforts to improve the vitality of town centres.

The Mayor has also said that “we must not create new communities that have to be dependent on the car”. Campaign for Better Transport has published information about the huge amount of car parking provision in new development schemes coming forward in London⁷. For example the current planning application for Brent Cross / Cricklewood includes 12,000 parking spaces and the local authority estimates it will generate 29,000 additional car trips per week day on the local road network.

Parking policy, and parking standards, should be reinforced to help foster town centre vitality and prevent car dependent development. So also should residential parking standards if we are to reduce car dependency, promote healthier, more active lifestyles and reduce carbon emissions.

Freight

In general Campaign for Better Transport supports the freight policies that the Mayor proposes to include in the revised London Plan. However the following changes or additions are necessary:

- Railheads should not be confined to aggregates but should be capable of handling other cargoes such as waste and container traffic
- Policy should support rail access to consolidation centres, which should not cater solely for breaking bulk of road freight
- There should be a policy of protecting and extending facilities for water-borne freight within the freight section

Finally it should clearly be stated that it is an aim of policy to reduce overall levels of lorry and van traffic; more detailed policies to achieve this aim should be included in the Transport Strategy.

CHAPTER 7 – LONDON’S QUALITY OF LIFE

In many ways our comments have been directed at improving quality of life and promoting healthier, more attractive transport conditions in London. Reducing traffic, encouraging active travel and use of public transport will help to promote healthy lifestyles and to benefit the public realm. We welcome the inclusion of a chapter on quality of life.

Neighbourhoods

We agree that the London Plan should support London’s neighbourhoods. Our evidence to the Outer London Commission set out our views on the importance of neighbourhoods and neighbourhood centres where a range of services and amenities could be available within walking and cycling distance of people’s homes. Enhancing the role of neighbourhoods is a crucial element of policies to reduce the need to travel and journey lengths and to enable more journeys to be made on foot and by bicycle. Our evidence suggested a number of measures to strengthen and improve the vitality of neighbourhood centres and the necessity of reducing traffic domination and providing safe and attractive walking and cycling conditions.

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⁷ http://www.bettertransport.org.uk/media/press_releases/september_2008/london_parking