

**TRANSPORT FOR LONDON**

**BOARD**

**SUBJECT: TFL'S RESPONSES TO THE LONDON PLAN AND ECONOMIC DEVELOPMENT STRATEGY FUNCTIONAL BODY CONSULTATIONS**

**DATE: 24 JUNE 2009**

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**1 PURPOSE AND DECISION REQUIRED**

1.1 TfL's draft responses to the proposals for the London Plan and the Economic Development Strategy (EDS) are set out in the appendices to this paper. They have been compiled with input from across TfL (Corporate and the Modes). Board Members are invited to comment on the attached draft responses.

**2 BACKGROUND**

2.1 The Mayor launched a full review of the London Plan and the Economic Development Strategy respectively on 29 April and 13 May (followed by his Transport Strategy Statement of Intent on 18 May). The initial consultation documents '*A New Plan for London – Proposals for the Mayor's London Plan*' and '*Rising to the Challenge- Proposals for the Mayor's Economic Development Strategy for Greater London*' set out the Mayor's vision for the capital, his planning objectives and a series of policy directions for London's development to 2031. TfL, GLA and LDA staff worked together to ensure consistency across the three draft strategies.

2.2 The primary aim of the consultation documents is for Assembly and Functional Body consultation, although other stakeholders such as the boroughs and the public can also comment. A full draft of the London Plan and the EDS for public consultation will be published in the autumn (along with the Transport Strategy).

**3 NEXT STEPS**

3.1 The responses will be sent by the Commissioner, in reply to a formal letter from the Mayor inviting TfL to comment. The deadlines for the final response on the proposals for the London Plan and on the EDS are respectively 30 June to the GLA and 14 July to the LDA.

**4 RECOMMENDATION**

4.1 The Board is invited to comment on the attached draft responses to the London Plan and the EDS.

**5 CONTACT**

5.1 Contact: Michele Dix, Managing Director, Planning  
Telephone: 020 7126 4513

## **APPENDIX 1**

### **Proposed response to London Plan Initial Proposals Assembly and Functional Body Consultation**

#### **1 INTRODUCTION**

- 1.1 TfL welcomes the opportunity to comment formally on the London Plan Initial Proposals, having worked closely with the GLA to ensure alignment with the emerging Mayor's Transport Strategy (MTS). TfL looks forward to continuing to work with the GLA on integration of land use and transport planning and to develop the Public Consultation drafts of the London Plan and Mayor's Transport Strategy alongside each other. Early sight of relevant sections of draft text for comment is encouraged to ensure that TfL can fully support the draft London Plan for Public Consultation when published in the autumn.
- 1.2 The Mayor's Vision and the six objectives of the Plan are fully supported by TfL. The Statement of Intent for the Mayor's Transport Strategy sets out key challenges (supporting economic development and population growth, providing a better quality of life for all Londoners, ensuring safety and security of Londoners, improving transport opportunities for all and tackling climate change) and addressing these will support delivery of the London Plan objectives.
- 1.3 The broad thrust of policy proposals is also supported, in particular the emphasis on the importance of Crossrail, public transport, walking and cycling in delivering Mayoral objectives, the key role of town centres, matching land use and transport planning to make the most of existing and planned capacity and safeguarding land for transport. However, some questions remain and these will need to be resolved prior to the Public Consultation drafts of the London Plan and Mayor's Transport Strategy being published.

#### **2 SCALE OF SHAPE OF LONDON**

- 2.1 The single most important issue for TfL and the Mayor's Transport Strategy is the amount and spatial pattern of economic growth, particularly in terms of population and jobs. This has fundamental implications for transport policy, planning, cost, congestion and crowding.
- 2.2 The projections for growth of population and jobs have been reviewed recently and are different to the projections contained in the February 2008 London Plan. Due to the significant implications for the Mayor's Transport Strategy being drafted at the moment, collaborative work between TfL and the GLA Economics will need to continue to ensure a full understanding of the implications on transport.
- 2.3 TfL suggests that in light of this, a range of employment and population projections rather than one definitive set would be preferable in the London Plan. However TfL acknowledges the London Plan team's concerns over issuing ranges for consultation. Similarly, a clear spatial distribution of jobs and population growth, in particular the relative role of outer London in accommodating this growth would usefully inform the MTS.

### **3 LAND USE AND TRANSPORT POLICY INTEGRATION**

#### **Chapter 2 London's Places**

- 3.1 TfL considers that support for the policy on Crossrail s106 contributions should be more prominent in the draft London Plan 'Places' and 'Transport' chapters.
- 3.2 The current consultation on the use of planning obligations in the funding of Crossrail proposes that contributions are sought in respect of office development in Central London (an area informed by the Central Activities Zone designated by Policy 5.1 of the London Plan) and the northern part of the Isle of Dogs. Care is therefore needed in suggesting any review of boundaries or definitions of the Central Activities Zone as part of the London Plan review (p29). More widely, TfL would wish to continue to work closely with the GLA on any review of the boundaries of the sub regions to ensure synergy with the London Regional Transport Plans that TfL is developing.
- 3.3 Furthermore, TfL would need to assess any new designated areas (e.g. Opportunity Areas – p33) in the draft London Plan for existing and potential transport capacity and connectivity. The new policy of encouraging commercial development and growth (p35) in existing town centres is fully supported, however there is concern over the impact of prioritising growth in Opportunity/Intensification Areas on transport investment. Some of these areas will not have the same degree of existing capacity/connectivity as town centres (in particular local connections to a surrounding residential hinterland) and it may be harder to justify and/or more expensive to provide new transport capacity/connectivity to these areas (in some cases for a single land use rather than mixed uses in town centres).
- 3.4 TfL suggests it would be helpful to include a 'growth hierarchy' in the draft London Plan, for example prioritising growth in existing town centres first, then currently well connected/high capacity Opportunity/Intensification Areas, followed by potentially well connected areas (in terms of justification and cost) and lastly the 'hardest' areas to serve well by public transport. This is particularly pertinent given the likely lower availability of funding for transport infrastructure over the coming years.
- 3.5 Industrial areas are often important locations for transport infrastructure and support services including depots, garages and freight facilities. Therefore, TfL suggests that the draft London Plan should include policy support to protect such sites when considering options for release of industrial land (p37), in accordance with the 'Land for Transport' Supplementary Planning Guidance.

#### **Chapter 3 London's People**

- 3.6 In any policy on 'optimising' housing densities (rather than 'maximising'), TfL suggests that the draft London Plan should recognise the role of transport capacity and connectivity in determining what is 'optimal' (e.g. not allowing too low a density in an area of high connectivity and high capacity, thereby not making the best use of existing infrastructure). TfL has provided comments on the draft London Plan Housing Supplementary Planning Guidance in a similar vein.

#### **Chapter 4 London's Economy**

- 3.7 As outlined in section 2, it is suggested that the projected broad scale of growth

and locations of each of the employment sectors is included in the draft London Plan.

- 3.8 TfL considers that any new policies in the draft London Plan on the night time economy (p52) need to be considered in context of the likely availability of transport and potential implications for TfL operations.
- 3.9 A draft London Plan policy supporting improvement and upgrading of town centres (p53), particularly for retail, is strongly encouraged as town centres are generally well connected in terms of transport.

### **Chapter 5 London's Response to Climate Change**

- 3.10 TfL would support draft London Plan policies on climate change mitigation (p55): one of the key goals of the Mayor's Transport Strategy is to contribute to the London wide target by seeking to reduce CO<sub>2</sub> emissions from ground based transport. Strong support in the draft London Plan for development of infrastructure for electric vehicles would be welcomed and would be consistent with emerging Mayor's Transport Strategy policy.
- 3.11 However, TfL considers that a stronger profile could be given in the draft London Plan to the role of renewable electricity generation in climate change mitigation. In particular, explicit support for the target of 25 per cent decentralised low-carbon electricity production in London by 2025 would be welcome. This would not only aid in climate change mitigation, but also improve security of energy supply and present opportunities for developing intellectual knowledge in an industry with significant future growth potential.
- 3.12 The Mayor is strongly supportive of a long-term shift from fossil fuels to electricity as the primary energy source for road based transport (as well as rail based transport as is currently the case). Therefore, sustainable electricity generation is a strategic issue, with a growing profile, that would benefit from strong endorsement through the draft London Plan. To aid in the shift from fossil fuels to electric power for road vehicles, clear and stretching guidelines for provision of charging points in new developments would also be welcomed.

### **Chapter 6 London's Transport**

- 3.13 Emphasis on the importance of Crossrail (p61) in providing more capacity to facilitate growth in the draft London Plan would be welcomed, however London Underground line upgrades also play a vital role in providing extra capacity and TfL considers that the draft London Plan could better reflect this.
- 3.14 A draft London Plan policy linking development to public transport capacity (p62) is supported, however, development also needs to be linked to public transport connectivity and TfL considers that the policy could be expanded to include this. Furthermore, TfL considers that making the most of existing (e.g. new Docklands Light Railway lines) and committed (e.g. Crossrail, London Underground line upgrades) transport capacity/connectivity should be prioritised, as mentioned above.
- 3.15 TfL considers that a draft London Plan policy on safeguarding land for transport (p62) should include protection for existing as well as proposed infrastructure and support services. 'Land for transport' can be very broad (e.g. tube vent shafts, depots, flood mitigation, temporary construction land) and therefore TfL considers that the wording of any policy relating to it should not be too

- 3.16 The support for strategic rail services in the draft London Plan is welcomed (p63) but TfL considers that support for increased capacity of these services, as well as at terminals and consideration of onward dispersion, should also be included. Mention in the draft London Plan could also be made of the importance of strategic roads that connect London to the rest of the UK and Europe.
- 3.17 TfL considers that the importance of improvements to bus services and local national rail/London Overground services should be mentioned in the draft London Plan alongside London Underground and Docklands Light Railway (p63). In particular, the role of the bus in providing more capacity, better connectivity and supporting economic growth, particularly in outer London, should be emphasised. Emphasising the importance of, and support for, station capacity and interchange improvements could also be considered.
- 3.18 TfL will continue to work with the GLA team to prepare the 'detailed schedule' of transport schemes (p63) that is proposed to be set out in the draft London Plan, to ensure full consistency with the Mayor's Transport Strategy and TfL's Business Plan. TfL and the GLA will also need to agree what schemes could benefit from specific policy support to assist planning and delivery, for example any new river crossings and Docklands Light Railway extensions (for example to Dagenham Dock).
- 3.19 The criteria for new road schemes (p64) has been developed with TfL and is consistent with the Mayor's Transport Strategy. However, TfL considers that smoothing traffic flow should be mentioned in the draft London Plan as an important way of maximising the economic efficiency of the transport network. Consideration could also be given to the role of taxi/public hire vehicles and motorcycles and how the draft London Plan could support them – these modes are not mentioned in the document.
- 3.20 TfL is supportive of a central coach terminus and would want to be involved in any investigations into providing further coach hubs (p64) to ensure that such proposals were beneficial.
- 3.21 TfL welcomes strong support for walking and cycling and that this should be included in the draft London Plan. TfL suggests that polices could consider how new developments can contribute to the uptake of these modes, for example through more integrated urban design and maximising permeability.
- 3.22 There is a specific point in relation to terminology which will need to be further cross-checked with TfL prior to publication to ensure consistency with the Mayor's Transport Strategy. For example, 'Velib' should not be used, rather 'Velib style' or 'bike hire scheme' (p64). TfL suggests that a glossary in the draft London Plan would be useful to explain the technical terms in all chapters.
- 3.23 Parking policy is a key influence on many desired Mayor's Transport Strategy outcomes, such as smoothing traffic flow, encouraging more efficient, healthier and less polluting modes and CO<sub>2</sub> reduction. Any review of parking policies (p64) for the draft London Plan should be accompanied by a package of measures to ensure that congestion does not increase, that policies to increase walking, cycling and public transport are not undermined and appropriate incentives for the use of low carbon vehicles (not just electric vehicles) exist.

3.24 TfL would welcome the support for freight, logistics and terminals (p65) in the draft London Plan but suggests that cross reference could be made to the London Freight Plan. Specific mention in the draft London Plan could also be made of the freight opportunity afforded by High Speed One and to support facilities for that at London Riverside. A policy to encourage the provision for off street delivery in new developments (as in the existing London Plan) could be considered in order to minimise impacts on traffic flow.

### **Answers to Specific Transport Questions**

3.25 Is the suggested approach to airport policy reasonable?

TfL is keen to see that arrangements for surface access from London to any expanded/new airports are aligned with those emerging from the Mayor's Transport Strategy, for example ensuring good connectivity to the tube/rail network in London to allow access for residents and businesses across London, ensuring sufficient capacity (services, terminal and onward dispersal) exists to meet the extra demand and enhancing the interchange and access arrangements to central London stations.

3.26 Given financial constraints, what else can the Mayor do to boost public transport?

In further developing the Mayor's Transport Strategy, TfL is examining the opportunities for enhanced public transport beyond the business plan period and will work closely with the GLA in prioritising these.

Besides further improvements to the rail networks, buses should be mentioned in the draft London Plan as a more cost effective and flexible way of increasing public transport capacity and accessibility, particularly in outer London.

Travel plans/smarter travel initiatives are a cost effective way to encourage changes in travel behaviour e.g. more cycling and walking, so reducing demand on public transport. Therefore they should be supported in the draft London Plan.

Support for and promotion of a seven day a week/365 day economy (e.g. tourism, flexible working) in the draft London Plan could reduce peak demand on the transport network.

3.27 Is the approach to cycling/walking feasible/workable?

TfL considers that cycling and walking (along with buses) are the most efficient, sustainable ways of moving people on the surface network and that the draft London Plan should support these modes.

TfL suggests that consideration should be given as to how the draft London Plan can support cycling becoming a 'mainstream' mode of transport. Policy proposals could include:

Encouragement of better street design (e.g. shared spaces/routes)

Standards for more secure (and more visible) cycle parking

Standards for cycle facilities within new developments

Encouragement of smarter travel initiatives to deliver a 'critical mass' of cycling

Encouragement of a high degree of pedestrian/cycle permeability in new developments.

3.28 Do you support the new approach to road schemes?

As stated above, the criteria for new road schemes (p64) have been developed with TfL and are consistent with the emerging Mayor's Transport Strategy. However, smoothing traffic flow should be mentioned in the draft London Plan as an important way of maximising the economic efficiency of the transport network.

**Chapter 7 London's Quality of Life**

3.29 TfL considers that public transport connectivity and capacity should also be taken into account when siting tall buildings (p68) and should be included in the draft London Plan policy – this comment is also relevant for the first specific question at the end of the chapter.

3.30 TfL would support a policy in the draft London Plan to promote greater use of waterways for transport purposes (p72). However TfL considers that any review of safeguarding of wharves should consider transport connectivity and capacity of the site, which may mean that alternative uses better support London Plan and Mayor's Transport Strategy objectives. For new sites, or those that remain safeguarded, policy support for active development for freight uses could be included.

**Chapter 8 Implementation, Monitoring and Review**

3.31 TfL fully supports the proposed approach to planning obligations which places public transport improvements as the joint top priority. The importance of this is vital given the likely constraints on public spending over the next few years.

3.32 Planning obligations for transport may relate to service provision, returning infrastructure to a good state of repair or increasing capacity so use of the wording 'transport projects' is rather restrictive and therefore TfL considers that it should be omitted from the draft London Plan.

3.33 It is important that the transport related key performance indicators in the draft London Plan are consistent with those being developed for the Mayor's Transport Strategy and to be monitored in the annual 'Travel in London' report.

## APPENDIX 2

### Proposed Response to the Proposals for the Mayor's Economic Development Strategy

#### 1 INTRODUCTION

- 1.1 TfL welcomes the opportunity to comment on the Economic Development Strategy (EDS) Initial Proposals, having worked with the LDA to ensure that the emerging Mayor's Transport Strategy (MTS) and EDS have consistent objectives.
- 1.2 TfL is supportive of the broad intentions of the document and welcomes the EDS message on the critical role transport plays in supporting London's economy and the need for further investment in the transport system. Below are TfL's suggestions to strengthen arguments in the public consultation draft of the EDS, especially on the economic benefits of currently funded and other potential transport schemes.
- 1.3 The concomitant revisions of the London Plan, EDS and MTS provide a significant opportunity to integrate land-use, economic and transport planning. TfL looks forward to continuing its collaboration with the LDA during the development of the public consultation draft of the EDS and the MTS.

#### 2 GENERAL COMMENTS

- 2.1 The objectives proposed in the EDS (*position and promote London as the undisputed business capital of the world; ensure that it has the most competitive business environment in the world; make it a leading global low carbon capital; give all Londoners the opportunity to share in London's economic success; and invest to ensure growth is spread across London, and in particular outer London*) are consistent with the objectives proposed in the MTS Statement of Intent (*supporting economic development and population growth; providing a better quality of life for all Londoners; ensuring safety and security of Londoners; improving transport opportunities for all and tackling climate change*). The delivery of the MTS will help achieve the EDS objectives.
- 2.2 TfL recommends that the public consultation draft of the EDS highlights linkages between the EDS proposed objectives and the London Plan's objectives. This will emphasise the EDS's strategic connections with the MTS.
- 2.3 The EDS states that improvement in London's transport system is urgently needed. The public consultation draft should explain why long-term and sustained transport investment is needed and what benefits they would bring to London's economy. The MTS Statement of Intent highlights the benefits for London's economy of TfL's Business Plan and High Level Output Strategy (HLOS) transport investment. For example, between 2007/2008 and 2017/18, existing TfL's Business Plan and HLOS proposals would deliver a 30 per cent increase in London's overall public transport network capacity, and contribute to the 30 per cent increase in the resident population within 45 minutes public transport travel time of London's employment locations. Crossrail, upgrade of the Tube and other infrastructure investment will also deliver large productivity benefits for London's economy. In addition, the draft MTS for public consultation, due to be published in autumn 2009, will also highlight benefits of transport investment further to the TfL Business Plan.



- 2.4 London's economic relation with its neighbouring regions has a significant impact on London's transport system and needs to be considered in developing the strategies. For example, journeys between London and the East of England and South Eastern regions are increasing, and rail demand is projected to grow by approximately 40 per cent between 2006 and 2026. TfL recommends that the public consultation draft of the EDS considers this and, for example, potential conflicts between travel within London and between London and neighbouring regions.
- 2.5 Similarly, it is suggested that the public consultation draft of the EDS provides a policy direction with regard to the continued role London will have as a national and international hub. In particular, the development of high-speed rail links with other UK and European cities would generate new opportunities for local development and significantly change London's catchment area for potential visitors, employees, business partners, etc.
- 2.6 More generally, the draft EDS could include a greater spatial element. This would be extremely useful as it would provide a geo-economic context for the MTS and would help define transport proposals to support London's economy.
- 2.7 In that respect, emphasis on outer London town centres and which types of economic development opportunities they offer would be useful. Prioritisation or difference in economic development objectives between town centres and Opportunity/Intensification Areas would also inform the MTS.
- 2.8 TfL notes that references to transport are limited to rail issues or interventions. Congestion and unreliable journey times on the road network have important negative impacts on London's economy. The role of buses, walking and cycling in helping to reduce congestion could also be mentioned as they are more efficient in terms of road space.

### **3 SPECIFIC COMMENTS ON THE EDS OBJECTIVES**

#### **London Business Capital of the World**

- 3.1 TfL considers that the EDS public consultation draft should give recognition to the vital role of the existing public transport network and connectivity in facilitating and maintaining London's role as a leading world capital. The exceptional growth and development in the 'Central Activity Zone' (CAZ) has been assisted by London's extensive transportation network and connectivity in central London. A barrier to future growth in the CAZ are transport capacity and reliability constraints, particularly public transport overcrowding; however prioritising increased investment in Central London would need to be carefully considered in the context of trying to encourage increased growth in outer London.

## **Improving London's Competitiveness**

### **Answer to specific questions related to transport**

- 3.2 What are the main threats to London competitiveness, and how can they be overcome? What can the Mayor do to ensure London retains its competitive business environment?

Poor connectivity, insufficient capacity, lack of resilience, high fares, and unreliable journey times are the main transport-related threats to London competitiveness. The MTS Sol sets out those challenges in more detail and TfL considers that the EDS public consultation draft could refer to the MTS public consultation to strengthen its arguments on those transport threats to London competitiveness.

Similarly, the MTS Sol sets out seven broad policy areas to support London's economy and its competitiveness. Again, the EDS public consultation draft could refer to the MTS proposals.

- 3.3 Other comments

TfL considers that the public consultation draft of the EDS should make reference to the vital role of freight movements to business activity, particularly retailing, and to the economic output and prosperity of London.

## **Transforming to a Low Carbon Economy**

### **Answer to specific questions related to transport**

- 3.4 What are the barriers to London developing global leadership in green industries and how can they be overcome?

There is a need to ensure a joined up approach with national government. Complementary policies must be in place to ensure CO<sub>2</sub> objectives are reached. For example, it is vital that national government provide internationally competitive incentives / tax breaks to green industries to ensure they establish in the UK rather than abroad. This is not something London can achieve on its own.

- 3.5 What particular strengths does London have that enable it to take a global lead in developing green jobs, and in what sectors will they give London an advantage?

London has a history of leadership and implementing new and innovative transport solutions, such as the Underground, or more recently congestion charging. Many major cities already look to London to provide leadership and expertise. Therefore, if London can provide competitive solutions, such as how to bring about an electric vehicle revolution, one could reasonably expect there to be a large potential market to sell to.

- 3.6 What practical measures can the Mayor implement directly to develop low carbon leadership? What measures should he lobby national government for?

The Mayor has already stated his intention to establish an electric vehicle centre of excellence. The national Government needs to provide an internationally competitive package of incentives for emerging green industries to locate in the UK as opposed to other countries.

### 3.7 Other comments

The long-term cost of inaction with regard to Climate Change is far greater than the cost of taking action. This should be highlighted in the public consultation version.

TfL agrees that one of the key issues that must be resolved is agreeing an appropriate carbon price that can be consistently applied in appraisals.

The public consultation draft of the EDS should lay greater emphasis on recovery plans to minimise disruptions in case of major hazards.

#### **Extending opportunity to all Londoners**

##### Answer to specific questions related to transport

3.8 What more should be done to ensure London's economic opportunities are genuinely available to all, to remove the barriers that stand in the way of this, and to motivate individuals to help themselves?

3.9 The Sol sets out a series of policy proposals to increase accessibility to the transport network, support regeneration and tackle regeneration. TfL considers that the public consultation draft of the EDS should refer to the emerging policies that will be developed in the MTS.

#### **Investing in London's future**

##### **Answer to specific questions related to transport**

3.10 Are there other key strategic investments that are vital to London's economic growth and to share prosperity, and how could these be financed?

The MTS will set out policy directions in terms of infrastructure investment in London and this should be reflected in the public consultation draft of the EDS. It is worth noting that the need to consider the next generation of investment beyond the current TfL's Business Plan is of paramount importance and the MTS will help inform this from a transport perspective.

3.11 How should the GLA group monitor the delivery of the investment London needs, and the achievement of the benefits from these investments?

If the public consultation version of the EDS is to include strategic performance indicators, it would be important that these be consistent with these in the MTS as well as those in the draft London Plan.

3.12 Other comments

Transport investment has a key role to play in economic regeneration. TfL therefore welcomes the reference to the DLR and its role in the regeneration of East and South East London.

TfL considers that the public consultation draft of the EDS could also elaborate on other key investment for London's growth: Crossrail, upgrading the Tube network and other the new investments underway, such as the East London Line extension, which support the creation of jobs and enable further growth and regeneration across key areas of the capital.

In addition, walking, cycling, and buses, which also contribute to regeneration

and local job access, should be cited as areas of investment for London.

More generally, the MTS will set out policy directions in terms of infrastructure development in London and this should be reflected in the public consultation draft of the EDS.