SLP Response to the Mayor's Transport Strategy

Introduction

The South London Partnership (SLP) is a sub-regional collaboration of five London boroughs: Croydon, Kingston upon Thames, Merton, Richmond upon Thames and Sutton. Through collaboration – between ourselves and with local public, private and voluntary and community sector partners – the South London Partnership is committed to accelerating and increasing the potential for economic growth in this area, beyond what we can achieve individually. South London has a critical role to play in the capital's economic future. It currently houses a £28billion economy with great opportunities for growth which can support and alleviate pressure on central London.

We agree with the analysis of the Mayor's Transport Strategy (MTS) that transport is key to connecting communities, opening up opportunities and creating the conditions for London's global economy to flourish. And we support the recognition of how it can improve residents' lives through healthier lifestyles, cleaner air and a better quality of public space.

We also welcome its recognition of the vital role that Crossrail 2 will play in delivering the strategy's ambitions, its ambitions for a London Suburban Metro and its recognition of Brighton Mainline Upgrade as the priority for capacity increases to radial rail services. We also welcome the inclusion of the Sutton Tram extension although it should be officially recognised as one of the MTS proposals.

Transport for a polycentric city

We believe that the MTS's vision for London is co-dependent with the SLP's vision of an increasingly polycentric London where Londoners have the option to find good jobs and leisure opportunities in a number of key centres which have good transport connections between them.

We acknowledge and embrace the fact that many residents of the SLP commute into central London to work but 59% of SLP residents travel to work within the SLP[1] and these journeys need better transport connections.

A polycentric city is key to London's future growth because alternative significant employment centres can meet needs, such as affordable workspace, sufficient space for follow-on space or affordable broadband, which central London cannot provide. This prevents businesses being unable to grow or forced to leave London and therefore allows for a broader ecosystem of businesses.

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[1] Census 2011; Origin-Destination; 'place of work and usual residence' by (all) methods of travel to work (Shared Intelligence 2017 SLP baseline)

A polycentric city also provides more opportunities and a greater quality of life for residents by offering more Londoners decent jobs within easy commute. This allows Londoners with caring responsibilities or low incomes to have greater access to jobs and provide an economy that works for all Londoners.

A transport system that supports this will be more sustainable as it will have regular movements in both directions at all times of day, allow more people to work within easy access of home and allow parts of Outer London to shift their mode share to more sustainable transport.

A focus on creating more and more jobs in central London has had success up until now. But, given London's particularly striking gap between employment and residential densities and its legacy infrastructure, we are concerned that there are now limited returns to expecting more and more people to travel into central London from inner, outer and beyond London and focusing transport investment on delivering this outcome.

Addressing concerns through the Sub-regional Strategy
For this reason while we welcome the ambitions and vision of the MTS we believe there are a number of areas where more work is needed and which we hope we can address in partnership with TfL and GLA.

The SLP leaders and Val Shawcross, deputy mayor for transport, have already agreed to work together to provide a shared spatial vision of South London's growth opportunities and the transport improvements needed to unlock and link these. This vision should be developed through a Sub-Regional Strategy which can help address areas such as:

- **Developing a fuller spatial vision:** We welcome that there are specific references to Outer London and its different challenges but the MTS needs to go further in recognising the variety of spaces between and particularly within Outer London boroughs. The future mode share and nature of town centres will be very different to streets of semi-detached family homes.

- **Managing resources:** Resources in boroughs, as well as in TfL, are far smaller than they were after the publication of previous Mayor's Transport Strategies and so local discretion will be required to determine how to meet the MTS's ambitions and prioritise appropriately to deliver important improvements.

- **Proactive analysis of transport provision:** We have concerns that the current methodology for assessing the benefits of transport schemes tends to favour providing more transport to areas with already good connectivity. Such a system

won't deliver the modal shift required and isn't appropriate for many areas outside central London. There may be a need to re-profile the parameters of these calculations for areas with limited connectivity if there are to be significant changes to modal share and improved connections between town centres in Outer London.

- **Focus on behaviour change:** We welcome the MTS's focus on the benefits that modal shift can provide in terms of providing more homes, cleaner air and healthier lifestyles. However the MTS needs to think harder about how it sells this vision to residents. There are some areas where boroughs are best placed to take the lead but many others where TfL have the best platform to communicate the messages necessary for behaviour change.

- **Vision for the future of transport:** The MTS would benefit from having more potential schemes, whether expanding existing rail and tram offers beyond 2041 or utilising emerging transport options, to encourage long term thinking. In particular consideration of how orbital links could realistically develop.

Sub-regional Strategy

The SLP leaders agreed with Val Shawcross, Deputy Mayor for Transport at a meeting in March 2017 to jointly develop a shared spatial vision of growth opportunities and the transport improvements needed to unlock them.

This ambition should be delivered by co-developing a Sub-regional Transport Strategy covering the SLP boroughs and their key interactions with other parts of London and the South East. This document will need to be officially referenced in the MTS to allow it standing in planning decisions.

This strategy would provide the necessary detail and local input to allow the LIPs process to be effective. It would need to involve significant joint working between SLP boroughs, TfL and GLA to ensure it brings together these organisations expertise and local knowledge. We anticipate it providing a framework to do the following:

a. Set out a sub-regional placemaking vision for South London which promotes an additional principle of 'Good Growth' that all residents are within easy access of a centre that can provide employment and leisure opportunities.

b. Ensure progress on borough priorities such as Crossrail 2, Brighton mainline upgrade and the Sutton Tram extension so that there is sufficient infrastructure investment to ensure growth in homes and jobs.

c. Develop a coherent and comprehensive plan for improving and 'metroising' South London's rail services

d. Identify and promote proposals for further transport improvements to support our growth opportunities, particularly in our key centres and links for our residents to other growth opportunities, such as further extension of the Tram and Tube networks and linking Thameslink and the Northern line through Morden South station.

e. Develop clear principles for how boroughs will deliver actions to tackle congestion locally

f. Manage changes to bus routes to ensure they best fit the needs of residents and react to new developments

g. Work closely with neighbours in Surrey to identify areas of joint working.

h. Champion the air quality agenda to ensure South London retains its quality of life offer through piloting cleaner buses and coordinating on electric vehicle charging

i. Explore how future innovations such as autonomous vehicles can be best applied to the access and connectivity needs and challenges of suburban areas

We will be in touch separately with a full outline of our vision for the Sub-regional Strategy and how we can deliver it together. It is important that an agreement on the principles for the strategy are agreed this autumn to allow a public announcement and references to be included in the MTS.

The strategy is an essential process that will allow the MTS to maintain its strategic high level role without making unrealistic expectations of LIPS to deliver the changes needed to meet its ambitions. Our responses to individual questions within this should all be seen in the context of that Sub-regional Strategy.

CONSULTATION QUESTIONS ON CHAPTER 1 – THE CHALLENGE

1) London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.

– Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.

We agree with the key challenges to the sustainability of London's transport system identified in the MTS but believe another should be added.

London has a particularly disparate mix between great density and concentration of employment in the Central Activities Zone (CAZ) and low density, dispersed housing through the rest of the city and beyond. This puts immense pressure on radial routes, in particular the historic London terminuses.

Infrastructure is inefficiently used as there is immense crowding in one direction during commuting hours and insufficient use of transport travelling the other way. Hong Kong, one of the few cities to achieve the levels of mode share the MTS is aiming for, has both more homes in and adjacent to major employment areas and greater variety of travel direction across the city.

Residents currently often live significant distances from work making cycling or walking to work impracticable and bus journeys too long. In the absence of far more rail investment than has been planned or is feasible, a city where more residents are closer to places of work and leisure is necessary for real modal shift. This is true both for daily commutes but also for weekend/leisure travel in Outer London.

It may also be necessary when seeking public consent for more growth in particular neighbourhoods. If growth consists of building more homes in Outer London for residents who will all then use overstretched radial routes into central London then there is often little value for existing residents in that growth. But if growth is predicated around providing more jobs and leisure opportunities in London's major town centres then it becomes easier to demonstrate the value the existing residents.

CONSULTATION QUESTIONS ON CHAPTER 2 – THE VISION

2) The Mayor's vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80 per cent of Londoners' trips will be made on foot, by cycle or using public transport.

– To what extent do you support or oppose this proposed vision and its central aim?

We support the thesis that the MTS should tackle air quality, congestion and unhealthy lifestyles and that in many parts of the city this will involve more trips made on foot, by cycle or using public transport particularly as the population grows.

However the proposal for mode share in Outer London to go from 59% to 73% (based on Figure 57 in the MTS) is especially ambitious given the current poor provision of public transport in many parts of Outer London. Some SLP boroughs have less than 50% of journeys by sustainable transport and the variety is even greater when comparing neighbourhoods within boroughs.

It is important that targets recognise the difference between different types of settlement in Outer London. There is a possibility with sensible planning to make certain areas (e.g. town centres) places with highly sustainable travel patterns, although 80% targets will require significant investment in sustainable transport infrastructure. However there will remain significant areas of low density suburban housing with low PTAL ratings which will struggle to justify major upgrades in public transport or cycle pathway provision. These are areas where significant modal shift is unlikely and the MTS and the Sub-regional Strategy will need to explicitly consider policy for such places and also consider how we work with neighbouring counties as many trips in Outer London involve leaving the city. The Sub-regional Strategy should explore a framework for assessing suitable mode share ambitions for different types of neighbourhood

The challenges posed by many Outer London neighbourhoods highlight why significant mode shift requires a focus on creating alternative major centres outside central London rather than focusing on how to get ever more people travelling into central London every day.

3) To support this vision, the strategy proposes to pursue the following further aims:

- by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day :
    - SLP supports this although the language should take into account those Londoners who through ill health or other causes are not in a position to do 20 minutes active travel

- for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041:

- SLP supports this principle but targets should consider the fact that the planned switch to many more journeys being taken by cycle will increase the risk of injury in the shorter-term.

- for all buses to be zero emission by 2037, for all new road zero emission by 2040, and for London's entire transport system to be zero emission by 2050
  - Buses should be zero emission significantly before 2037 to show leadership and new buses introduced to Outer London lead the way in reducing pollution. SLP supports the targets for road emissions and believes the target for the entire transport system can be more ambitious.

- by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public:
  - SLP supports the principle of reducing traffic volume but more work needs to be done to determine how this will be done. This is a task the Sub-regional Strategy could help with.

- to open Crossrail 2 by 2033
  - SLP considers Crossrail 2 fundamental to the aims of the MTS, to relieving capacity on the busiest line in the country and to the potential for growth in the sub-region.

- to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor
  - SLP strongly supports a suburban metro and believes efforts should be made to include South Western Railway as well. Working with TfL and Network Rail to identify solutions to the technical and logistical barriers to 'metroisation' should be a key priority of the Sub-regional Strategy. Mode shift in South London relies on metroisation and steps need to be taken to progress it with or without rail devolution. The Brighton Mainline Upgrade is a crucial first step in ensuring that metroisation is technically possible.

- to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared with the full network
  - SLP supports this principle but many of the proposals won't help South London which has very few tube stations. There needs to be a mechanism to ensure that Network Rail stations, many of which would be technically easier to make accessible, are added to the step-free network at similar rates.

- to apply the principles of good growth
  - SLP supports the principles of good growth as a basis for initial discussion but believe thriving town centres which act as employment hubs are also necessary. We would propose a further principle of good growth which is the opportunity for major

town centres to grow as employment and leisure hubs to ensure that all residents are within easy access of a centre which could provide employment and leisure opportunities rather than depending on Central and Inner London for provision. This requires transport investment particularly in links between town centres.

CONSULTATION QUESTIONS ON CHAPTER 3 – HEALTHY STREETS AND HEALTHY PEOPLE

4) Policy 1 and proposals 1-8 set out the Mayor's draft plans for improving walking and cycling environments (see pages 46 to 58).

– To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.

The SLP supports the ambitions to ensure residents walk or cycle wherever appropriate. Key to allowing this to happen in Outer London is investment in cycling and walking infrastructure and ensuring that more opportunities for work and leisure are available in the major town centres so residents feel that what they are looking for is easily accessible by walking or cycling. However current cycle route network plans are inadequate in South London and will leave many of the residents who will need to be targeted for modal shift far from cycle infrastructure. We recognise and welcome the identification of cycling potential in the sub-region but stress the need for funding of infrastructure in order to realise this potential

The MTS should also recognise that topography makes a significant difference to cycle usage with Richmond and Kingston having higher usage than many parts of Outer London aided not just by green space but also its relatively flat routes. The MTS should look more explicitly at e-bikes as a way to make cycling more feasible for residents who have to deal with steeper hills.

5) Policy 2 and proposals 9-11 set out the Mayor's draft plans to reduce road danger and improve personal safety and security(see pages 62 to 67).

– To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

6) Policy 3 and proposals 12-14 set out the Mayor's draft plans to ensure that crime and the fear of crime remain low on London's streets and transport system (see pages 68 to 69).

– To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London's streets and transport system? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

7) Policy 4 and proposals 15-17 set out the Mayor's draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).

– To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

8) Proposals 18 and 19 set out the Mayor's proposed approach to road user charging (see pages 81 to 83).

– To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.

SLP supports plans for a smarter, more responsive road user charging, as highlighted in the GLA's report "London Stalling" but this will need to be introduced and managed by TfL. A smart road user charging system is not something that can be introduced at a borough level through LIP traffic reduction strategies or indeed solely through the Sub-regional Strategy.

The Sub-regional Strategy provides a useful opportunity to identify share principles for traffic reduction across the sub-region including whether expansion of road user charging into Outer London is necessary.

9) Proposals 20 and 21 set out the Mayor's proposed approach to localised traffic reduction strategies (see page 83).

– To what extent do you agree or disagree with this approach? Please also describe any other measures you think should be included.

Localised Traffic Reduction Strategies require significant coordination particularly on policies such as workplace parking levies where there are risks involved in one borough choosing to do so while others don't. SLP see the Sub-regional Strategy as an appropriate place for traffic reduction strategies to be agreed to reduce resource pressure on borough LIP teams and guarantee consistency across boroughs that need to work together. It is also crucial that income from road charging, workplace parking levies or any other traffic reduction strategy that would tax residents is invested in transport infrastructure locally.

10) Policies 5 and 6 and proposals 22-40 set out the Mayor's draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).

– To what extent do you agree or disagree that these plans would help London become a zero carbon city? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

11) Policies 7 and 8 and proposals 41- 47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

CONSULTATION QUESTIONS ON CHAPTER 4 – A GOOD PUBLIC TRANSPORT EXPERIENCE

12) Policy 9 and proposal 48 set out the Mayor's draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling (see pages 118 to 119).

– To what extent do you agree or disagree that these plans would provide an attractive whole journey experience? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

13) Policies 10 and 11 and proposals 49 and 50 set out the Mayor's draft plans to ensure public transport is affordable and to improve customer service (see pages 121 to 125).

– To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport? Please also describe any other measures you think should be included.

14) Policy 12 and proposals 51 and 52 set out the Mayor's draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan (see pages 127 to 129).

– To what extent do you agree or disagree that these plans would improve accessibility of the transport system? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

15) Policy 13 and proposals 53 and 54 set out the Mayor's draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed (see pages 133 to 137).

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

SLP tentatively welcomes suggestions for more bus routes to be introduced to Outer London however it will need to adhere to the following principles:

- Outer London cannot be used as a dumping ground for heavily polluting buses even on an interim basis
- Greater transparency and discussion between TfL, SLP and the boroughs is required in assessing where new buses could be introduced, whether for new routes, amended existing routes or greater frequency of current routes. Consideration of appropriate sizes and types of buses is also important.
- Opportunities should be made for routes which risk bringing in less in fees in the short term but through behaviour change and new development may later prove to be popular

- Careful joint work will be needed between boroughs and TfL to ensure buses improve journey times rather than overload the roads at pinch points particularly around stations.
- There are limits to how many buses can use town centres before they become detrimental to the Healthy Streets agenda and managing the experience of town centres must be a key consideration.
- Bus priority should in certain places be considered as a stepping stone to the introduction of tram routes which have proved to be more successful at ensuring modal shift.
- It's important to ensure that major orbital routes between town centres (e.g. A2043) have sufficiently quick flow for buses to be a viable option.
- Boroughs, including Kingston and Sutton with the introduction of K and S routes, have demonstrated in the past that bus routes can create as well as follow demand. TfL plans, supported by the Sub-regional Strategy, must be willing to take the risk of proactive provision if it is going to meet the challenge it has set itself.

The Sub-regional Strategy provides a vital opportunity to manage this process and if there is not greater local control of the rollout of buses to Outer London, the SLP and its Boroughs will struggle to support it.

16) Policy 14 and proposals 55 to 67 set out the Mayor's draft plans to improve rail services by improving journey times and tackling crowding (see pages 140 to 166)

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

There are twice as many tube stations outside London as inside the SLP. And two boroughs have no TfL rail service at all. It is important that the MTS recognises this discrepancy and the challenges it poses to significant mode shift in parts of the SLP.

This is why SLP believes Crossrail 2 and metroisation of South London services are fundamental to both the MTS and SLP's vision for London. They will enable future growth of homes, jobs and leisure opportunities in the SLP but also enable modal shift among existing residents. Investment is needed to allow SLP to have equivalent public transport options to other parts of Outer London.

The MTS highlights the 'semi-orbital' function of stations including Wimbledon and Clapham Junction. These are already used as such by many passengers and Crossrail 2 and metroisation will both likely increase this usage. But capacity is already limited at these stations and significant investment is required to allow them to grow as interchanges for orbital routes. We welcome plans for an interchange at Streatham and believe this will be an important part of metroisation.

More detail should be published about what TfL believes is necessary to convert existing rail infrastructure into an adequate platform for metroisation. SLP is keen to work with TfL, Network Rail and TOCs on this but there needs to be greater knowledge sharing about the investments that are required. The Sub-regional Strategy provides an important forum for developing this work.

We welcome identification of the Sutton Tramlink extension. It is essential this becomes an official proposal. Other unfunded plans such as the Bakerloo line extension are labelled as proposals and it is important that all infrastructure plans are given this status particularly when there is so little investment planned for this part of London.

We believe that there are more opportunities for both tram and tube extensions into the future and this is an area where the Sub-regional Strategy must develop thinking and increase ambition.

The current uncertainty around Crossrail 2 and how it will be funded demonstrates the fact that it is going to be increasingly difficult to gain national support or funding for large scale radial infrastructure. Transport planning must develop so that rather than creating demand for Crossrails 3, 4 and 5, other town centres and orbital connections become the next stage of development.

17) Policies 15 to 18 and proposals 68 to 74 set out the Mayor's draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully inclusive and well-connected public transport system. The Mayor's policy to support the growing night-time economy is also set out in this section (see pages 176 to 187).

– To what extent do you agree or disagree that these plans would deliver a well connected public transport system? Please also describe any other measures you think should be included.

The SLP has no specific comments on this policy

CONSULTATION QUESTIONS ON CHAPTER 5 – NEW HOMES AND JOBS

18) Policy 19 and proposals 75 to 77 set out the Mayor's draft plans to ensure that new homes and jobs are delivered in line with the transport principles of 'good growth' (see pages 193 to 200).

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

We welcome the introduction of principles of good growth but believe they can be developed further.

We agree that new homes and jobs should be developed with a focus on sustainable transport but would propose a further principle of good growth: that it should provide the opportunity for major town centres to grow as employment and leisure hubs to ensure that all residents can easily through walking, cycling or short journeys on public transport access a centre which could provide employment and leisure opportunities rather than depending on Central and Inner London for provision. This will require better links between town centres and also effective use of above station development both to provide space for jobs and homes but also to improve passenger experience.

19) Proposals 78 to 95 set out the Mayor's draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving existing public transport services, providing new river crossings, decking over roads and transport infrastructure and building homes on TfL land (see pages 202 to 246).

– To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth? Please also describe any other measures you think should be included.

The SLP agrees that there should be higher modal share targets for areas which have major growth, but only if that growth comes with additional infrastructure.

The SLP recognises that Crossrail 2 provides an opportunity for more housing but stresses that investment to stations on areas which are not receiving new tracks will be needed and that it needs to be balanced with ensuring that industrial land capacity is not diminished.

The SLP believes new bus services are crucial to the sub-region but there will be limited opportunities for them to unlock new development especially when roads lack the space for bus priority. However where there are opportunities they could also be considered as a potential forerunner to an extended tram network which has proved to change mode share. This is an area where the Sub-regional Strategy can help identify future ambitions and apply them to current LIPs and bus planning.

The SLP welcomes TfL's plans to use its surplus land for development and agrees that mixed use development around stations is crucial. The Sub-regional Strategy should allow us to work closely with TfL and GLA on these areas.

The SLP welcomes the aims of Proposal 94 and sees the Sub-regional Strategy as filling the role of the mechanism referred to at 94a) as a mechanism for co-ordinating planning and investment along transport growth corridors.

20) Policy 20 and proposal 96 set out the Mayor's proposed position on the expansion of Heathrow Airport (see pages 248 to 249).

– To what extent do you agree or disagree with this position? Is there anything else that the Mayor should consider when finalising his position?

Despite SLP's location between London's two major airports, the surface transport to Heathrow is entirely inadequate and we support the need for southern rail access whether or not there is a third runway. SLP shares TfL's diagnosis that car use will continue to be the overwhelming choice of transport to Heathrow from South London and Surrey unless substantial investment is agreed.

SLP agrees that the long term solution is to connect Heathrow to either the South West main line and/or the Windsor Lines and wants to work closely with TfL and other stakeholders in planning the best plans to deliver this. SLP is supportive of Hounslow's plans to develop a link from Feltham to Heathrow as an initial step, connecting to both the Windsor Lines and to the South West mainline in the longer term.

CONSULTATION QUESTIONS ON CHAPTE R 6 – DELIVERING THE VISION

21) Policy 21 and proposals 97 to 101 set out the Mayor's proposed approach to responding to changing technology, including new transport services, such connected and autonomous vehicles (see pages 258 to 262).

– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

We welcome the application of the core Healthy Streets principles to automated vehicles, private cycle hire and car clubs. However we believe the MTS should expand these principles into a fuller vision of how we see them fitting into the future of this city. The Sub-regional Strategy offers an opportunity to develop that vision specifically for their impact on suburban and lower density areas.

22) Policy 22 and proposal 102 set out the Mayor's proposed approach to ensuring that London's transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).

– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

The SLP has no specific comments on this policy

23) Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor's approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283).

– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

The formatting for the LIPs is clear and helpful but there is a disparity between the expectations of the LIPs which need to set mode share targets for 2021 and 2031 and the MTS which does not. It is also noticeable that the MTS expects the LIPs to do much of the work in shifting mode share through actions such as congestion charging and workplace parking levy. Not all of these are appropriate to be delivered at a local level. They will also need to be supported by city-wide behaviour change campaigns to publicise the aims around healthier living and reductions in air pollution.

The Sub-regional Strategy will also need to play a major role in ensuring LIPs are effective. It should consider providing a sub-regional framework for the coordination of LIP actions and activities. It can then be used, following the publication of the LIPs, to champion the projects from the Liveable Neighbourhoods programme and Growth Fund that will be required to allow SLP to shift its mode share. This will be crucial given the poor legacy of provision in the sub-region and a small proportion of the projects outlined in the MTS benefitting the area.

24) Are there any other comments you would like to make on the draft Mayor's Transport Strategy?

We would emphasise again that the MTS's vision of an 80% sustainable transport mode share is not achievable if transport investment and business growth continues to be focussed on Central and Inner London. To achieve its aims in a way that is logistically feasible and meets the needs and desires of residents requires a renewed focus on allowing the major town centres to grow not just in terms of homes but in terms of jobs and leisure opportunities.

A Sub-regional Strategy which has significant weight in planning decisions and allows for coordination across boroughs and with neighbouring counties can help deliver this as well as help fill in the gap between the MTS as it is currently drafted and the expectations of the LIPs to deliver those ambitions. We believe this is necessary in South London and will be discussing a full detailed proposition with TfL officers in the near future.