London Transport Users Committee

Response to the Public Consultation Draft of the Mayor's Draft Transport Strategy

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This response is structured in three parts:

- Part A: the Committee's views on key issues raised (or omitted) by the Strategy;
- Part B: a proposed vision for London's transport; and
- Part C: a paragraph-by-paragraph commentary on the draft strategy, which provides supporting detail for the topics addressed in Part A, and also covers other substantive points.

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Executive Summary

The Committee warmly welcomes the broad thrust of the Draft Strategy. There is much to support.

The key points on which the strategy needs further development are as follows:

- The Strategy often gives the impression of simply gathering together existing initiatives. There needs to be a serious assessment of the future demands on London's transport, and an explanation of how (and to what extent) the proposals meet that. It is difficult to assess the adequacy of the Strategy in the absence of this.

- There is little evidence of coherent assessment of the costs and benefits of particular measures, and thus the priority that ought to be given to them. It is therefore difficult to assess whether the Mayor's priorities are the right ones.

- The provision of costings, timescales and funding arrangements for the action proposals is sporadic. The Mayor needs to ensure that these are always made clear. Some of the timescales for what are supposed to be early improvements are surprisingly long.

- The Mayor's objectives are good, but they are not translated into a vision of what sort of system the Mayor aspires to in practice – i.e. the outputs the Mayor wishes to see. Such a vision would give a target to aim at. The Committee proposes a basis for such a vision.

- There are shortcomings in the Strategy's consideration of transport's relationships with spatial and economic development. There is also an under-recognition of the importance to Greater London of links to places beyond its boundary (and vice versa); of the importance of town centres; and of the demands made by London's increasingly 24-hour, 7-day nature.

- The Mayor needs to go further in making the transport system more accessible.

- Safety and security are poorly addressed.

- The Mayor should go further in reallocating roadspace to the more sustainable modes and in reducing parking provision. There will inevitably be winners and losers; the greatest overall good should be served. Substantial increases in capacity for general traffic are unsustainable, and would be in conflict with the Mayor's other objectives.

- Both mega-projects and smaller rail schemes are important and must be progressed.

- London's fares and ticketing regimes should be better integrated, and eventually unified.

- TfL could do much more to ensure that the National Rail network works better for London, and provides the quality of service that London's passengers deserve.

- There is a case for an optional 'second person' on some buses, with a range of possible duties, but traditional conductor-operation should not be increased. The open platform should not be perpetuated in future bus design. Existing Routemasters should be retained for the remainder of their working lives, but there must also be accessible routes in parallel to the Routemaster-operated routes.

- The voice of users is crucial; the strategy needs refinement in relation to the role of user groups and other consultative mechanisms.

- There are a number of factual errors and misquotations, which unfortunately undermine the force of the Strategy.

A detailed commentary is made on the Draft.

Part A

KEY ISSUES

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1 Welcome points

1.1 The Committee warmly welcomes the broad thrust of the Draft Strategy. There is much to support:

(a) the Mayor's treatment of transport as his top priority (Foreword);

(b) the high-level objectives of developing and improving London's transport system and its wider links in sustainable ways (3.4);

(c) the high-level recognition that transport users' priorities must be the prime focus for operators (3.9);

(d) the wide range of areas in which the strategy seeks improvements;

(e) the wide range of proposals which are made;

(f) the recognition of the need for accessibility;

(g) the recognition of the importance of walking, both as a mode in itself and as an inescapable part of any journey ;

(h) the support for intermediate modes and for the London Metro concept;

(i) the proposal for congestion charging as a key plank of strategy for central London; and

(j) the recognition that all the elements of the transport jigsaw (in terms of different modes, agencies and funding arrangements) must fit together properly.

1.2 In the interests of brevity, these will not be discussed further. The remaining commentary focuses instead on the key areas in which the Strategy needs further consideration. Similarly, Part C will not refer to the paragraphs in the draft Strategy with which the Committee agrees and which need no further comment.

2 The factual credibility of the Strategy

2.1 The strategy contains a number of instances of misquoted, muddled or unhelpful statistics (2.3, 2.43, 2.44, 2.57, 2.64, 2.79, Figs 4C.2 & 4C.3, 4C.57, 4C.59, 4E.3, Figs 4E.1 to 4E.3, 4E.4), and factual errors or misleading statements (2.44, 4C.25, 4C.55, 4C.56, 4E.4, 4E.5, 4E.28, 4J.4). It is therefore difficult to have full confidence in the analytical basis of the policy-making (irrespective of whether or not there is agreement on the policies proposed).

3 Priorities

3.1 Although various references are made to the Mayor's priorities, both generally (4A.6) and in the context of limited funding (5.15), there is little evidence of coherent assessment of the costs, benefits and deliverability of particular measures, and thus the priority that ought to be given to them.

3.2 It is therefore difficult to assess whether the Mayor's priorities are the right ones – or indeed to be confident that such a coherent prioritisation has taken place at all.

4 Details

4.1 The provision of costings, timescales and funding arrangements for the action proposals is sporadic. The Mayor needs to ensure that these are made clear for them all.

4.2 There needs to be a summary table of the Mayor's proposals, showing in each case the priority level, lead body, targets, timescales, analysis of costs and benefits, and its (quantitative) contribution to the strategy. The Strategy must also make clear which schemes have funding available, which do not, and what choices may need to be made.

Timescales

4.3 Some of the timescales that *have* been given are surprisingly long. Notably, the Mayor envisages CrossRail being opened before the last of the main bus corridors is upgraded (4Q.13 and 4F.21) – this despite improving buses being a short-term priority. And it will be 2015 before London is to be a walking-friendly city (Policy 4I.1) – by which time the Chelsea-Hackney line could be open too! The Mayor should consider whether such timescales can be compressed.

5 A lack of coherent assessment and vision

A lack of coherent assessment

5.1 At the lower levels, there are numerous details of individual schemes, proposals and intentions. However, there is a distinct impression, notwithstanding the many new foci of interest, of being a gathering together of existing initiatives (particularly for modes formerly under London Transport's (LT's) control) or simply existing received wisdom. There is discussion of current problems (Chapter 2), and some discussion of future needs (notably in terms of rail overcrowding). But this is not a serious assessment of the future demands on London's transport and an explanation of how (and to what extent) the proposals meet that.

5.2 Similarly, although isolated statistics are quoted (or misquoted), there is no coherent assessment of (or consideration of the volume of existing research into) what users require from the system, or are dissatisfied about. Mayoral opinions on passengers' requirements and problems, most of which are actually right in general terms, are presented as truisms, without consideration of what are the most significant areas that will generate the greatest change in user satisfaction or in modal shift, or of which locations/times/etc. are particularly unsatisfactory. (And this is despite Transport for London (TfL) having few equals among World City operators in the field of market research.)

5.3 Only with that can the adequacy of the strategy really be judged. Welcome as the gamut of measures from Countdown to CrossRail is, it is not obvious whether the strategy is merely a first step towards meeting the demands (and if so, how big a step), or the whole solution. Similarly, it is not clear whether the proposals keep up with existing levels of service (such as levels of overcrowding, or bus journey times) as demand grows, or actually produce real improvements. Scrutiny gravitates instead towards the level of 'does this wish-list mention everything?'

5.4 Nor does the strategy acknowledge that forecasts vary, and that the assumptions behind them may not hold true (e.g., changes in the level of fuel taxes, or in central London employment). Thus there is no explanation of what measures would or would not be needed in the later years of the strategy, according to what the circumstances turned out to be.

5.5 The Strategy should therefore set out the state of London's transport system (e.g. in terms of overcrowding, journey times or reliability) and the 'do-minimum' forecasts for 2011. It should set out what contribution each of the Proposals would make to improving these statistics, and what the Strategy as a whole would do by what year.

A lack of coherent vision

5.6 The Mayor rightly wants his strategy to be an agenda for action. He also rightly acknowledges that London's transport needs are long-term, requiring more than just quick wins in a first term.

5.7 So it is disappointing that the Strategy fails to ask a basic question: what will London's transport users need, want or deserve in 2010 (or whatever the planning horizon is)? At the top level, the Mayor states his 'objectives' (3.4), which are actually general aims, and he puts great emphasis (rightly) on aspiring to a transport system that is 'high-quality', 'world-class' and other laudable things. But this is not translated into a vision of what sort of system it means in practice – i.e. the outputs the Mayor wishes to see.

5.8 The missing vision and the missing assessment are connected, because much of the vision can be expressed in terms of requirements – such as (to take arbitrary examples), how long it should take to get from one place to another, what places each location should be directly connected to by public transport, whether (and for how long) commuters should have to stand, the desirable extent of real-time information, and so on.

5.9 The vision would give a target to aim at, for the multitude of 'costed programmes' that are to be drawn up. Naturally, the parts of the vision that would be addressed first would be the ones that were most cost-effective (and deliverable). The longer-term and more difficult parts of the vision would naturally require interim targets for (say) three or four years from now, in line with the Mayor's approach. There would be particular instances when meeting the specification would be unduly expensive (i.e. would be very poor value-for-money), so derogations could be made for particular places (arising from either local circumstances or the limitations of a particular public transport site), or particular timescales. Full accessibility to some deep-level Underground stations is an obvious example. The key point is that there would be a need to justify derogations, rather than to justify implementation.

5.10 The Strategy should therefore adopt a vision that sets out what the capabilities and quality of the transport system ought eventually to be. Action plans and targets would follow from that. The Committee suggests some starting-points for such a vision in Part B of this response.

6 How the country should treat its World City

6.1 The Mayor opens the strategy with two correct and key points. Firstly, Britain depends to a great degree on London, particularly in economic terms. Secondly, transport is part of the social fabric of society and affects the city's performance and quality of life.

6.2 In that light, London's transport must be seen as part of wider social and environmental policy. This in turn means that the finances of London's transport must reflect their value to the national balance sheet. This may mean, in some circumstances, support at a national level to reflect London's particular needs and its importance to the national economy. The Committee would support, in principle, Mayoral representations to central

government on this basis. (Policy 4B.1 seems to be suggesting this, but it is made in the specific context of supporting fares, which is not the only way, nor necessarily the best way, to spend money.)

7 The relationship between the Transport Strategy and other strategies

7.1 The Mayor has made it clear that he intends for London to remain a World City. The Committee accepts this. But the Committee remains concerned at some shortcomings in the Strategy's relationships with spatial and economic development (3.20 to 3.26).

Under-recognition of the importance of outer London town centres

7.2 There is a distinct under-recognition of the importance of the suburban town centres. They are important because:

(a) they are equivalent in size and function to large towns or small cities in their own right. Croydon is outstanding among them. (Over 50,000 people commute into the London Borough of Croydon every day, which is nearly as many as commute out of it. Central Croydon is a major commuter destination.);

(b) they also have a helpful role in spreading demand for transport, rather than concentrating it in commuter flows converging on central London. This makes for a more efficient and sustainable system; and

(c) they are the parts of outer London that are most accessible by public transport, yet in which congestion and conflicts are most prevalent.

7.3 The Mayor's proposals for these centres are relatively limited, especially in comparison to the proposals for central London (and particularly the mega-projects, which are focused on the centre). The Committee therefore believes the Mayor needs to go further in supporting these centres and in promoting sustainable access to them (including traffic reduction).

The manufacturing sector

7.4 The Strategy fails to consider the specific issues relating to transport for employees in manufacturing or distribution industries. Sites with continuous production, and hence shift work, have round-the-clock transport demand that is not often catered for by public transport – understandably, since a critical mass of passengers is not always present.

7.5 Such sites come in two forms. There are large manufacturing areas (such as Park Royal, the Lee Valley or Dagenham) which are relatively isolated from other demand generators, but have some degree of critical mass in themselves. There are also numerous smaller pockets of industry (often containing the smaller firms) in heterogeneous areas. The latter are in themselves more sustainable, but planning policy has, for reasons of neighbourliness, hitherto sought to eliminate (or at least not actively support) them. Their transport provision requires particular consideration.

The timing of transport with regeneration

7.6 The experience of Docklands, in the early years of its regeneration, shows what happens when transport provision does not keep up with development. The Mayor's plans do not make it clear how he intends to ensure that the delivery timescales for the current regeneration areas (3.24), particularly the Royal Docks and the Thames Gateway corridor, relate properly to each other.

The effects of long-distance commuting

7.7 Recent years have seen a growth in long-distance commuting to London. This trend will be encouraged in future by the policy of real reductions in commuter fares and by the forecast real-terms growth in incomes. The Strategy should consider the spatial development implications of this.

8 The relationship between London and surrounding areas

8.1 The Mayor rightly recognises (2.21, and 2.30 to 2.32) the principle that London is a national and international centre. The strategy considers the international links, but makes little further reference to the national ones.

8.2 The Mayor also recognises that London (by which he means the GLA area) is the hub of a city-region (e.g. in terms of its commuter and leisure catchment area) that extends well beyond the GLA's administrative boundary. But there is little further consideration of what this means in practical terms.

8.3 Thus there is too infrequent a recognition that meeting London's needs means considering issues that go across the border, and influencing planning and transport policy-making on the other side (e.g. the Orbit study). By the same token, the transport strategy must reflect what people living on the other side need from London's transport and from the transport that crosses the border. The only issue that is seriously addressed is the pressure on rail capacity for commuters.

Overcoming the arbitrary border

8.4 There are numerous places that, for administrative rather than practical reasons, are on the other side of the Greater London boundary, but are in many ways part of London in practical terms – places such as Chigwell, Dartford, Epsom and Waltham Cross. Indeed, they are very often part of the continuous urban fabric.

8.5 Furthermore, many of London's outer town centres have catchment areas that extend beyond the boundary (e.g. Uxbridge). Similarly, many places just outside the boundary rely on these town centres (e.g. Denham relies on Uxbridge). Both sets of places rely on their cross-border links.

8.6 Thus there must be adequate short-distance links across the boundary. However, these are sometimes weak at present. This is a key issue that the Strategy hardly considers. The topics that need to be addressed are as follows.

The level of cross-boundary bus services, and who is to champion and fund them

8.7 The trend in cross-boundary bus service levels has not matched the increase in services in the adjacent counties, let alone the increase within London. Users whose journeys take them across the boundary have not shared in the benefits that passengers elsewhere have seen. This reinforces the view that the cross-boundary services have been given too little attention by service planners. This in turn seems to be because of the administrative no-man's-land into which these services fall.

8.8 This cannot be in the interests of passengers. The Mayor must ensure that TfL works with operators and neighbouring authorities to improve the provision of cross-boundary services.

Cross-boundary taxi fares

8.9 Fares for taxi journeys to places outside the boundary are negotiated between the passenger and the driver. There is a steady stream of complaints about this, almost entirely coming from passengers who started at Heathrow Airport. Local but cross-boundary journeys (e.g. to Spelthorne) can be expensive. (There is also an issue about

the reluctance of some drivers at Heathrow to undertake in-boundary local journeys.) These issues needs to be resolved if taxi services are to be fully effective.

Cross-boundary train services that are functionally part of the London Metro network

8.10 Many of the train services that will make up the London Metro run across the border (e.g. to Dartford). The service and quality specification should reflect this.

Cross-boundary accessible transport

8.11 Specialist accessible transport services (such as Dial-a-Ride) should also cater for short-distance travel across the boundary.

The Croxley Link

8.12 The physical works for this project lie outside the Greater London boundary, but it is to be part of the Underground, and thus soon to be directly within the Mayor's purview. It is a missing link that will benefit the London city-region as a whole, and will benefit north-west London in particular by virtue of improving access to and from Watford, and by eliminating the need to travel via central London for many journeys (e.g. Harrow to the West Midlands). It has widespread support across London. Yet it is not mentioned at all in the strategy. The Mayor should support its early construction. (The Committee takes no view at this stage on the closure proposal for the Croxley Green branch.)

9 The relative importance of mega-projects and midi-projects

9.1 The Mayor proposes (Chapter 4Q) a pot-pourri of major projects, ranging in scope/cost and in precision of definition from CrossRail to intermediate mode schemes.

9.2 The Croxley Link (see above) should be added to the list.

9.3 The Committee supports all the rail and intermediate mode projects, in principle, but is keen to ensure that resources are directed in the most effective ways.

9.4 Taking forward the major projects is listed as one of the early priorities if resources are scarce (5.15). It is not quite clear whether this refers to funding for scheme design or for the actual construction. In either case, however, choices may still have to be made between the possible schemes (or any others that may appear). Indeed, the GLA has told the Committee that there would probably only be enough money for one or two of the intermediate mode schemes in the next ten years. If cost-benefit appraisals turn out to leave little to choose between schemes, a value judgement will be needed on which benefit to buy.

9.5 Several years ago, when similar choices between rail schemes in particular appeared to be inevitable, the former London Regional Passengers Committee (LRPC) instigated a consultation with user groups, local authorities and its other stakeholders. It was aimed at drawing out opinions on the merits or otherwise of giving priority to 'mega-projects' focussed primarily on the central area, compared to a wider range of smaller rail projects that would spread benefits more thinly but more widely.

9.6 Many respondents were hostile to concentrating resources on a limited number of mega-projects *if this meant that smaller schemes bringing benefits to a wider range of individual localities were crowded out*. Thameslink 2000, CrossRail and Chelsea-Hackney each had strong support. But CrossRail had active opposition on a significant scale, mainly because its huge cost was seen as disproportionate to such benefits as it would bring. Several more modest proposals attracted backing from well beyond their immediate areas of impact, notably a Woolwich rail tunnel, ELLX, and the Croxley link.

9.7 The Committee recognises the importance of the large schemes, but firmly believes that implementing a range of smaller schemes will also bring substantial benefits to many

people. There is a need for a supply of small schemes to be available ('oven-ready', in the jargon). Furthermore, the Mayor needs to ensure, so far as possible, that he avoids the stop-go funding regimes of the past that have hitherto bedevilled the rail networks in particular, and which have resulted in dashed expectations and sub-optimal use of resources. The Committee therefore believes that there should be two parallel budgets, for larger and smaller schemes, so as to ensure that small schemes are not easily squeezed out by funding constraints.

9.8 As for priorities within each budget, it is difficult to make specific choices between particular schemes in the absence of background details of the costs and benefits. In general terms, where cost-benefit calculations leave little to choose between schemes, the Mayor should adopt the following priorities (in this order of importance):

(i) schemes that address the facets of travel which market research has shown to be the most unsatisfactory ones;

(ii) schemes that spread benefits (e.g. journey time savings) thinly to lots of people, rather than concentrating big benefits to a few people;

(iii) schemes that facilitate local journeys rather than longer ones; and

(iv) schemes that facilitate existing journeys (e.g. by reducing congestion) rather than encourage new ones.

9.9 There may also be limits to the engineering and technical resources that are available at any time, and thus to the number of projects that can be undertaken at once (this is currently particularly acute for railway signalling projects). TfL should consider how it can help to address these, where necessary.

10 The 24/7 city

10.1 The Strategy seriously underplays the increasingly 24-hour, 7-day nature of London life. The main reference is in 2.15, which merely refers to increasing incomes and their effect on off-peak travel. But there is also:

(a) the continuing needs of shift workers, for whom public transport is often not available or very sparse. These include staff of manufacturing firms(see above); the emergency services; other essential services such as hospitals; transport providers; and night-time maintenance or cleaning staff.

(b) the growth in the 24-hour leisure and service economy (clubbing, shopping, etc.), which is not just confined to central London; and

(c) the increasing importance of Sunday travel, which is often made by car to locations traditionally poorly served by public transport anyway (e.g. to car boots sales in fields, DIY superstores on trading estates, country parks or heritage attractions). Sunday is now as important as Saturday for shopping and leisure journeys.

10.2 Public transport provision has not always kept pace with these developments, particularly on the National Rail network (see the LRPC's report 'Who Goes Home?'). Night-time travel is poorly served. It is notable that Chapter 4C makes no mention of the feasibility or otherwise of an all-night Underground service. The growing number of Sunday journeys must be catered for from the outset, so that car-based habits (which are hard to shake off) do not develop further. Personal security (see below) is a vital element of making the city, and its public transport attractive, at night.

11 Safety and security

11.1 The various discussions of safety and security are particularly poor. In some cases, they are a long way from being the fully-informed and competent analysis that would be expected from the Strategy. No-one could reasonably disagree with the Mayor's overall objective, but the Strategy does not always have the right approach to achieving that, and some of its comments are very harmful to its credibility.

Confusion between safety and personal security

11.2 Safety (i.e. casualties in accidents) and personal security (i.e. mugging etc) are confused with each other in several places (4E.28, 4N.2 and 4P.27). This does not give confidence in the Strategy's grasp of the issues and of the policies needed to tackle them.

Extremely poor grasp of National Rail and Underground safety issues

11.3 The discussion of railway safety (both National Rail and Underground) shows a particular lack of understanding or competence (2.44, 4C.56, 4E.3 to 4E.5, and 4E.16). Statistics are misused (2.44, 4C.57, 4E.4). Concepts and organisational structure are mis-understood (2.44, 4C.25, 4E.4, 4E.5). Unsubstantiated opinions and premature judgements are given (4C.24, 4C.56, 4E.3, 4E.16).

11.4 It may be helpful for the Mayor to seek advice from the Railway Inspectorate on the background to these safety issues.

11.5 There is no consideration of trespass and vandalism, which is a substantial and growing safety risk to passengers, staff and perpetrators alike. The majority of train safety incidents are due to vandalism. (Trespass and vandalism also cause disruption - for example, vandalism is the greatest single cause of disruption on Tramlink.) The GLA must consider how it can strengthen the railway industry's work in addressing the underlying causes (such as getting the anti-trespass message out to schools and youth organisations).

11.6 Also, increased station staffing (see Part B) will assist not only with security (as the Mayor recognises) but also with safety (by discouraging trespass and vandalism at the station).

Weakness of consideration of bus safety and security

11.7 Since bus travel is less safe than rail travel (though much better than other road modes), it is odd that bus safety (4F.34) receives so much less coverage than rail safety. In particular, the relative safety of open-platform / double-doored / single-doored buses needs to be considered (so that policy decisions are taken in the full knowledge of this).

11.8 The complete omission of references to bus passenger security is also worrying. Security while waiting is picked up in 4G.49, but there is nothing about security on board. Surveys by DETR show that the biggest problem here is the behaviour of school children – how is this to be tackled (see section 18 below)? What about the ways in which the bus operators can assist with measures that help to tackle wider crime problems (e.g. in Operation Seneca)?

Lack of analytical discipline in assessing road safety

11.9 The Mayor's discussion of walking, cycling and motorcycling (4G.24 to 4G.27, and 4G.40 to 4G.46) takes a rather bitty attitude to safety. The *relative* safety of each mode should be spelled out, not only motorcycles, as should forecasts of the effects that the Mayor's proposals (overall) will have on casualty levels. A coherent approach to casualty reduction is needed.

11.10 The analytical discipline that applies to rail safety investment is not applied to roads. There are merely arbitrary-seeming targets (4G.43). What is the economic and social cost of road casualties? What level of casualty reduction is affordable? Furthermore, the discussion of road safety seems to be confined to traffic accidents. There is no consideration of safety on pavements – which reputedly results in far more hospitalisations.

11.11 More fundamentally, the Mayor seems to be treating the safety of rail users, bus users and motorcyclists/pedestrians/cyclists in isolation from each other. With limited resources, the Mayor's requirement for value-for-money should be leading him to prioritising those safety improvements which will save the greatest number of lives and injuries within the resources available to him.

12 Traffic reduction

12.1 The Mayor's proposals are aimed at reducing the level of traffic in central London, in the town centres of inner and outer London, and in residential areas (4G.6). They are expected to reduce traffic levels in central and inner London, but only to moderate the growth of traffic in outer London and across London as a whole (4G.56). The Mayor also plans to support Boroughs' local initiatives to reduce traffic, especially in town centres and 'unsuitable areas' (4G.57). In the longer term, he says, his policies 'could be developed to reduce further traffic and congestion' (4G.58).

12.2 The disbenefits of traffic are well known. Reductions in non-essential traffic will benefit all Londoners (if the displaced users are properly accommodated on other modes) – and will allow improved public transport by virtue of the greater demand for it. The Committee would therefore look, in principle, to real reductions in traffic in all areas of London.

12.3 The question is: what can practically and politically be achieved? The Committee acknowledges that the Mayor's congestion charging proposal goes as far as is realistically achievable for a charging scheme at this stage. Attention must therefore turn to other measures that can reasonably be introduced within this strategy. There are two key points.

12.4 Firstly, the suburban town centres, some of which have catchment areas equivalent to small cities in their own right, are major sources of traffic. Their role – and the opportunities for reducing traffic in them – is seriously underplayed in the Strategy.

Parking reduction

12.5 Secondly, the supply of parking is a major policy tool. In particular, the availability of private non-residential (PNR) parking (i.e. parking spaces at workplaces, shops and leisure locations) is a key factor in influencing modal choices.

12.6 The Mayor's approach and policies to parking management are partly welcome, but partly unsatisfactory. For a start, they are difficult to fully comprehend, being split between three chapters (3.29 to 3.30, 4G.71 to 4G.81 and Annex 1). But once they have been unravelled, shortcomings become apparent:

(a) He rightly recognises that parking provision significantly affects modal choice (3.29), and can act as a traffic reduction mechanism (4G.74, 4G.75, 4G.77), but fails to properly carry this through in his Proposals.

(b) The Parking Plans are to 'meet the overall objectives of the Strategy' (4G.80). But the strategy has so many different objectives that virtually any parking policy could be given a veneer of compliance – Objectives T1, T3, T5, T6, T9 and T12 could all be used to justify 'predict and provide'

levels of parking. This in turn means that the proposals for different types of parking are also woolly.

(c) Proposal 4G.20 is similarly woolly.

(d) Proposal 4G.21 implies that reasonable access to local shops etc. *by car* is to be ensured. But this should be a lower priority than reasonable access by (and movement of) buses.

(e) Despite accepting that 'in some areas, ways of reducing the amount of existing private non-residential (PNR) parking spaces must… be found if traffic congestion is to be tackled' (4G.79), there is no proposal on this. Yet it is an important part of encouraging modal shift.

(f) Annex 1 holds that 'clearly in most situations car-free housing is impractical' (paragraph 13), without justifying this. Given the growing population pressure on London, the scarcity of land, and the amount of land required for parking provision, an element of car-free housing actually provides a sustainable approach. Demand for it exists at both the high and low ends of the housing market.

(g) The Strategy underplays the way in which parking restraint (or more efficient use of kerbspace, such as with 'car clubs') can liberate kerbspace and roadspace for more essential users, or (by reducing the wasteful use of land for parking, particularly in town centres) can contribute to wider regeneration and sustainability objectives.

12.7 The Mayor accordingly needs to:

(a) require parking reduction as an explicit aim of boroughs' parking plans, in order to encourage modal shift – particularly in town centres;

(b) make it clear that buses will get priority over private parking for on-street kerbspace;

(c) require boroughs to reduce the provision of municipal public off-street parking (and indeed to reduce their own staff parking provision, in view of their status as major employers);

(d) require boroughs and TfL to attempt to reduce existing levels of private non-residential (PNR) parking. This will involve both negotiation and matching public transport improvements. It *is* possible – Ikea in Croydon is reducing its parking provision now that its customers are using Tramlink extensively; and

(e) encourage an appropriate level of car-free housing and the development of 'car clubs'.

12.8 The argument made against reduced town centre parking, particularly by outer London boroughs, is that people will instead drive to parking-friendly out-of-centre developments, or to mega-complexes on the other side of the border. This does need to be addressed. Carrot measures will be needed, including both public transport improvements and re-use of the liberated parking space in a way that will enhance the attractiveness of the town centre.

12.9 In more general terms, parking reduction must be supported by public transport improvements, so that there is an attractive alternative to the car-based journeys that are to be discouraged. In particular, access to town centres and orbital journeys in outer London must both be addressed.

13 Allocation of roadspace

13.1 The Mayor's policies for the use of roadspace require greater clarity and direction. The shortcomings are as follows:

(a) He wishes to manage the streets better for people, goods and services (Policy 4G.1) – but this is not clear as to whether 'better' means maximising throughput or means prioritising more sustainable modes.

(b) The main clue to the Mayor's policy is the general statement that distinguishes between the priorities for main roads and local roads (4G.16 to 4G.18, and Policy 4G.2). However, this is not very helpful. On the main roads, it leaves open the inevitable conflict for roadspace between buses and commercial vehicles, and for kerbspace between bus passengers and goods loading. It also promises nothing for cyclists and pedestrians (even though the Mayor is proposing to part-pedestrianise Trafalgar Square!).

(c) The Mayor seems to believe (4G.18) that kerbspace allocation can satisfy all interests. Practical experience tells us that this will not always (perhaps not even often) be the case. The principal conflict is between loading needs and those of buses. It remains unclear what the Mayor wishes to prioritise.

(d) The mayor appears to be treating short-term parking (presumably shoppers 'popping in') fairly even-handedly with bus stops – thus failing to prioritise the more sustainable mode.

(e) It also appears that the roadspace freed up by traffic reduction (including congestion charging) is to be retained, to reduce congestion (4G.62 and Annex 4 paragraph 21). Yet he also seems to promise extra space for buses, pedestrians and cyclists (including the World Squares project (4I.7)). This is a clear conflict of aspirations.

(f) Related policies are inhibited by this lack of clarity, such as bus lanes (4G.22). Boroughs, faced with parochial or NIMBY lobbies, will be able to cop out of serious public transport improvements simply by claiming the need for 'balance'.

13.2 As with traffic reduction, there is a political decision to be made about the extent to which winners and losers can be created. But the Committee has no hesitation in recommending to the Mayor that he should be firmer in re-allocating roadspace to the more sustainable modes. The Mayor needs to refocus his policies, aiming them at a sustainable road system, acknowledging that there will be winners and losers and working for the greatest overall good.

13.3 In relation specifically to main roads, the Committee agrees with the Mayor that they are important for distribution. They will therefore require roadspace to be allocated so as to optimise the net mobility of goods/people (or minimise net delay). But this is in turn modified by the Mayor's (welcome) aim to secure modal shifts, which will give opportunities to allocate roadspace in accordance with a 'sustainability hierarchy' of modes: walking, buses, cycling, taxis, cars. (Buses should get priority over cyclists because of the far greater importance of buses than cyclists on these roads, and because of the practical difficulties in sharing roadspace between the two – for example, the safety issues arising from having the two modes sharing bus lanes.)

Servicing and deliveries

13.4 This leaves the problem of where goods loading and servicing fits in. The Committee acknowledges the need for rationality, and believes that this is best served by giving priority to moving traffic and to bus stopping arrangements:

(a) the greater good is served by a loading movement making way for the far more numerous other priority road users than by the numerous others being held up by the one loading movement;

(b) business as a whole will benefit from better flow of traffic. Some services (e.g. emergency repairs) are time-critical, and some businesses might need to adjust the hours of deliveries and of staff who receive goods, but there are more opportunities for adjustments to servicing and deliveries than there are for wholesale changes to wider travel patterns ; and

(c) rear delivery, or loading on side road returns, is hardly less effective than loading directly outside a front door. This option is not available to buses.

13.5 Accordingly, the Mayor should explicitly provide for:

(a) a presumption that on-street loading is confined to side road returns or off-peak times (off-peak being defined as appropriate in each case – e.g. late night is a peak time in the West End);

(b) a presumption against provision for on-street loading, where rear servicing is available;

(c) assisting the development of rear servicing facilities, where these are currently lacking or require upgrading to suit current requirements; and

(d) an effective level of enforcement.

13.6 More fundamentally, however, the Committee believes that a coherent distribution strategy for London is needed. Otherwise, policy risks perpetuating the idea that white vans must be necessarily be accommodated on the roads at all times of day. It would be better to avoid the conflict, where possible, than to have to resolve it. The Mayor's proposals for investigating sustainable distribution do not go far enough in this respect. There is also a need to ensure that planning policies aimed at protecting residential amenity do not unduly restrict the opportunities for making deliveries at quiet times of the day/week.

Towards the end of the gyratory system

13.7 Traffic reduction and/or roadspace reallocation policies present an opportunity (either as a policy tool or as a resulting benefit) for London's gyratory systems to be reviewed. There may be opportunities for bus-specific measures (e.g. contraflow bus lanes), or indeed more extensive changes. The benefits would be that:

(e) they often use residential roads, which could be returned to more appropriate uses;

(f) they tend to exclude buses from key traffic objectives in one direction and/or make it difficult for passengers to find bus stops, both of which make bus use both unattractive and confusing – this could be remedied;

(g) they often involve lengthy difficult routes for pedestrians, which can be made more attractive; and

(h) there may be opportunities for environmental improvements, or for better use of land that is currently wasted (e.g. in the middle of large roundabouts).

14 Congestion charging

14.1 The Mayor's plan to introduce congestion charging is welcome, as is the extent to which the details of the Mayor's proposals are compatible with the Committee's views.

14.2 However, the following details in the proposals need to be reconsidered:

(a) Need to protect areas just outside the boundary from parking stress: The Strategy underplays the importance of protecting the areas just outside the boundary from parking stress caused by people driving up to the boundary and then switching to other modes.

(b) Level of charges for cars: the charge should be higher than the price of an All Zones One Day Travelcard (ODTC), so that it is seen to be cheaper to use public transport. The ODTC is currently £4.90, and by 2003 may well have become £5. The option should also be considered of making the charge a multiple of the price of an ODTC and including payment for that Travelcard.

(c) Payment arrangements: The option should also be considered of allowing payment by Prestige smartcard.

(d) Exemption for licensed minicabs: Once minicab licensing is fully in force (i.e. the vehicles are licensed), these vehicles should be exempted, for the same reasons as for taxis.

(e) Discount for powered two-wheelers: As congestion charging is designed to encourage the use of sustainable modes, the use of powered two-wheelers should be discouraged at least as much as car use: (i) they are less sustainable than public transport, cycling or walking; (ii) they are more dangerous for the rider and for other road users than cars; and (iii) they can be noisier than cars. However, this category of vehicle ranges from powerful motorbikes to small powered scooters, and these criticisms do not necessarily apply so much to the smaller vehicles. The smaller vehicles should therefore receive a discount, and the remainder should pay the same charge as a car.

(f) Level of penalty charge: the Committee supported the Mayor's original proposal for a basic penalty of £100. It is not clear why this has changed to £80.

(g) Persistent offenders: It is not clear whether the Mayor's proposals address the Committee's view that impounded vehicles belonging to persistent offenders should be held until all outstanding fines have been paid. (However, Regulations currently in draft form would require this.)

15 Major road schemes

15.1 The Mayor leaves open the opportunity for major road schemes, but the policy effectively gives a presumption against schemes that increase capacity for private vehicles (4G.85 to 4G.88, and policy 4G.28 – see also 4G.83 to 4G.84). Of note are the North Circular Road schemes that TfL is to review, and which have split local opinion. These locations are currently bottlenecks at certain times of day.

15.2 The Committee believes that new capacity for general traffic is only desirable in some limited circumstances. The Committee would wish to see such schemes appraised on a suitable basis (such as the New Approach to Transport Appraisal framework), in order that proper consideration can be given in the light of the assessed costs and benefits.

Schemes should be specifically targeted, and must take every opportunity to provide additional benefits for public transport users.

16 Fares and ticketing

A coherent policy is needed

16.1 Fares serve two functions. One is to raise revenue, the other is to send price signals. If the aim is to maximise revenue (i.e. require users of the service to bear all, or more, or as much as is tolerable, of the costs of running it), and to treat external benefits accruing to society at large as free goods, then fares will be set at the highest level the market will bear (taking due account of the varying elasticities of demand in different segments, if they can be individually priced). This has been roughly the Government's attitude to LT pricing – though not to fares on the regulated railways.

16.2 If there are other social or economic policy aims (e.g. maximising ridership, or fostering modal split, or changing journey lengths/frequencies/directions/times of day or week), then fares will be set at levels (and ticketing will be structured) in ways designed to promote the passenger behaviour sought. This will usually involve lowering some (or at least holding them down, which has the same effect over time), reducing revenue and thus requiring subsidy. The subsidy is a charge on the public at large, and can be raised in various ways. Determining a proper balance between fares and subsidies requires an assessment of (*inter alia*) who gains, who pays, how effective this is as a means of promoting the chosen policy goals, what the wider effect on travel patterns is (e.g. encouraging or discouraging long-distance commuting), and what the opportunity cost is (i.e. what else could the same money have been used for instead?).

16.3 London's fares policies have insufficiently considered these basic questions. A thorough review is therefore needed of what fares are meant to achieve and of the correct balance between fare levels and farebox income, and thus of how fares policy can best contribute to the Mayor's objectives. Without this, it is difficult to assess the Strategy's fares proposals in a holistic way.

Fiscal treatment

16.4 The Strategy should also consider how the Mayor and TfL can help to lobby for better fiscal treatment of employers' contributions to sustainable staff travel (e.g. paying for season tickets, or providing staff minibuses).

Integration

16.5 Currently, the National Rail, bus, Underground/DLR, Tramlink and river fares systems are basically separate entities. The only real integration is with Travelcards and LT Cards, and with some through fares between the various rail networks. This lack of integration produces a number of problems:

(a) journeys that are most conveniently done multi-modally (e.g. bus then rail) often cost more than similar journeys within just one mode;

(b) such journeys (especially those involving buses) often require more than one ticket purchase, thus delaying the passenger and adding to the demands on the system;

(c) Underground ticket offices cannot sell the full range of tickets for journeys involving National Rail legs, even for journeys wholly within London (which especially frustrates passengers who are taking National Rail services from that very station);

(d) National Rail stations do not sell bus passes, despite being often a potentially convenient outlet; and

(e) passengers have to learn the quirks of several different ticketing systems and the complicated rules about exactly what tickets are valid on what elements of London's rail networks (e.g. the status of Exchange Travelcards, the extent of inter-availability between National Rail and LUL services, or the long-standing issues around the central part of Thameslink).

16.6 In a truly integrated and seamless system, the aim should be for passengers making journeys within London to be able to buy one ticket, at (or before) the first point they access the system, which will cover them for the whole journey. The Mayor should therefore investigate, in conjunction with the SRA and ATOC, options for bringing all the modes together into a single, simple and coherent ticketing system. (Proposal 4B.5 refers only to the rail modes.)

16.7 The system should also be coherent in the use of Smartcards. The Strategy is distinctly confused over the extent to which (and the stage at which) they will be accepted on all the modes controlled by TfL (4B.15, 4B.22, 4D.5).

16.8 In the meantime, the Mayor should encourage better integration of the existing systems. There are a number of problems that arise from seemingly small administrative details but which collectively, and quirkily, inconvenience many passengers. For example, Travelcards issued by conductors on National Rail trains are not accepted on the Underground or buses, requiring a swap for an 'acceptable' ticket (at a interchange station with an open ticket office) or an extra payment (on a bus). The Mayor should also consider the extent to which there can be closer integration of ticketing for bus journeys that cross the London boundary.

Travelcard

16.9 Travelcard has been one of the major successes of London's public transport, providing a simple and attractive product. The one-day Travelcard, in particular, is now the ticket of first choice among leisure travellers. Its retention as a product, even if smartcards are used as the ticketing medium , is vital. The strategy should expressly provide for this. The scope for niche Travelcards (with 'add-ons' for particular services, admission to leisure attractions etc.) should also be considered.

The non-season problem

16.10 There are many loyal customers of the transport operators who travel often (maybe three times a week) but not often enough to make a season ticket worthwhile – such as part-time workers, homeworkers, and people with 'portfolio careers'. They feel hard done by as a result of having to buy individual tickets each time. TfL should explore the extent to which advanced bulk buying at a discount (similar to the Underground's carnets) can assist this market, as well as reducing the demands on ticketing facilities. The London-wide bus carnet that TfL is planning will be a helpful first step.

The cashless bus

16.11 The Committee supports the Mayor's objective of speeding up bus services. The Committee also welcomes the plans to make it easier to buy bus tickets before boarding. But the Mayor believes that this 'could pave the way for the 'cashless' bus' (4B.20). This rather glosses over the potential downsides of such an approach (such as whether occasional users would have to go out of their way to buy a ticket, and whether roadside ticket machines would be capable, reliable and robust enough to replace the human interface).

16.12 The Committee has no objection *in principle* to a cashless bus system, if it can be made comprehensible, workable and convenient for all. The devil will be in the detail. Such a system should only be introduced consciously after serious thought, learning from experience of such systems abroad (and of cashless tram systems in Britain), and consultation. It should not be the inevitable product of the transition to increased off-bus

ticket sales. The Committee would have to be fully convinced of the comprehensibility, workability and convenience in practice of a proposed system, before it could lend its support to the proposal.

Passenger-friendly revenue protection

16.13 Penalty Fares have been a source of substantial upset to many London Underground (LUL) passengers who have found themselves caught up in a system that (they believe) has unfairly penalised them. The Committee has sympathy with a great deal of these cases. Recent changes to the system have reduced the number of situations in which the Committee believes penalty fares are issued inappropriately (but legally), and forthcoming changes will do so further. However, the Committee still believes that the virtually complete gating of the Underground provides an opportunity for LUL to abolish Penalty Fares altogether, and commends such a policy to the Mayor.

16.14 The Committee also remains supportive of TfL's desire to improve the likelihood of a fare-dodger being prosecuted and being given a meaningful punishment.

16.15 The National Rail operators should also be encouraged to improve their own ticket examination arrangements (both on trains and at stations, as appropriate). This is not just for direct revenue protection reasons – honest passengers are justifiably aggrieved when they see others getting away with free travel, it regains control of the railway from vandals and other criminals (because they will generally only travel for free), and a staff presence will also give passengers reassurance and an information source.

17 Accessibility

17.1 The Mayor rightly states that accessible transport is required (2.41), although parts of the strategy (4C.45, 4O.11, 4O.12, 4O.17) seem to have ignored the message that accessibility is about more than just disabled people.

17.2 Indeed, nowhere are the benefits of mainstream accessible transport, and hence the justification for it, fully spelt out:

(a) social inclusion;

(b) making travel easier for everyone, not just for the people who particularly benefit;

(c) encouraging modal shift (by making public transport easier to use – e.g. for families with pushchairs); and

(d) reducing the need for *specialist* accessible transport, which can be very resource-intensive, and allowing it to concentrate on those users who have such specialist needs that mainstream accessible public transport is unsuitable (Chapter 4N vaguely alludes to this in various places).

17.3 More practically, several of the most important policies are rather woolly. Overall, the transport system is merely to be 'more accessible', giving everyone access to 'a range of services, facilities and jobs' (4O.1). This is not sustainable in a 21st century World City. Surely the ultimate aim should be for full accessibility (or as close as can practically be achieved)? This accessibility should be by mainstream services wherever practicable, and by specialist services in other cases. Specifically, the proposals for accessible stations are rather unambitious (4E.10).

The importance of street infrastructure

17.4 But an accessible public transport system is only available if the street infrastructure (on which you have to go to/from the stop/station) is accessible too. Boroughs and TfL will

need to address this, just as the Mayor is addressing the issue of accessible bus stops and stations.

17.5 The Mayor makes some reference to this, particularly in the context of the areas around DLR stations (4D.1), but this does not address the whole issue. We suggest a rolling programme aimed at eventually making all streets accessible. To maximise the early benefit, it should start with the areas around accessible stations (as the Mayor proposes), or along accessible bus routes, and work outwards from them.

18 School commuting

18.1 The strategy makes little reference to schoolchildren's daily travel, merely 'Safe Routes to Schools' (which is welcome but only part of the solution). This travel generates a number of specific problems:

(a) congestion caused by the school run;

(b) parking and dropping-off pressure caused by the school run, and lack of enforcement, with resultant illegality and safety risks;

(c) very localised (in time and space) demand peaks, requiring either inefficient use of resources to accommodate it or overcrowding;

(d) vandalism of buses/trains and stops/stations; and

(e) intimidation of other passengers.

18.2 The problems must be addressed. The only realistic solution to the congestion and peaking problem is a transport-led one, because more fundamental options such as staggering school hours or restricting catchment areas are unlikely to be achievable in the foreseeable future, even if they were deemed to be desirable. Accordingly, the Mayor needs not just safe routes to schools but also consideration of:

(a) the role of roadspace and kerbspace management and enforcement;

(b) controlling in-vehicle and at-stop/station behaviour; and

(c) the utility of dedicated School Buses.

19 Routemasters and conductors

19.1 Although it is not spelt out explicitly, the Mayor clearly expects Routemasters to continue in use on some bus routes (4F.32). He has stated elsewhere that he is open to the idea of a new open-platform design. He also plans to double the number of conductors (4F.16), but it is not clear whether this involves more Routemasters or conductor operation of conventional buses (or a combination of both). These implicitly raise issues about basic policies for London's bus services.

19.2 It is important to separate the issue of conductors from that of Routemasters, because you can have a conductor on a conventional bus.

Conductors

19.3 The use of conductors has both advantages and disadvantages (Table 1).

For Conductors	*Against Conductors*
No delays at stops due to a queue for cash fares (nullified by cashless bus)	Targets for robbery (nullified by cashless bus)
Can provide a tourist-information and general assistance function (if the conductor is good enough or well-motivated enough)	Twice as many opportunities for cancellations or timetable cutbacks due to endemic staff shortage
Can improve perception of personal security	Twice as many opportunities for cancellation due to staff shortage on the day
Can raise the recruitment pool for bus staff, by attracting people who want to drive but not have the passenger/cash interface, and vice versa	Extra staffing costs – requiring either higher fares or money that would have been used elsewhere

Table 1: The arguments for and against conductors

19.4 In the 1980s, when London's conversion to one-person-operation was being completed, the former LRPC researched public opinion. People generally preferred to have conductors, but were unwilling to pay higher fares for the privilege. The Mayor does not seem to be considering raising fares for that purpose; thus funding for conductors will inevitably mean diverting funds from another part of the transport system.

19.5 Staff shortage is currently a key factor in London. There is no clear prospect (notwithstanding the Mayor's aspiration on this) of an end to the current endemic driver shortages. The Committee does not believe it to be realistic to assume that even more staff can be recruited and retained in the next few years. Furthermore, the Mayor's aspiration (which the Committee supports) to reduce the need for on-bus ticket purchase will, if successful, reduce the delays at bus stops which appear to be the principal reason for the Mayor's proposal (4F.16). The Committee believes that, in an ideal situation with unlimited resources, increased numbers of conductors would be desirable. But the situation is far from this.

19.6 However, the Committee believes that there is a clear case for an optional 'second person' on some buses (or at some stops), who would have duties appropriate to that particular location, route or time – such as fare collection, security duties (on late-night buses or those full of schoolchildren) or passenger information and assistance (e.g. on tourist routes). Importantly, the absence of a rostered 'second person' should not result in a service being cancelled.

Routemasters and the future of the open platform concept

19.7 Several arguments are generally made in favour of Routemasters over conventional buses. Many of them relate to the advantages of having a conductor. But these are made by comparing a Routemaster with an OPO conventional bus, whereas it is possible (as indeed the Mayor seems to be proposing) to have a conductor-operated conventional bus. So the real comparison is between that and the Routemaster. Other arguments concern the principle of having an open platform (rather than driver-controlled doors).

19.8 The practical context is that Routemasters have about ten years of useful life remaining. There have been suggestions that a custom-designed 'bus for London', which could have an open platform, could be developed to replace them.

19.9 The legal context appears to be as follows. Regulations made under the Disability Discrimination Act require newly-built buses to be fully accessible. Existing non-compliant buses (including Routemasters) may continue in service until 2017. The Regulations concerning other aspects of bus design do not prohibit an open platform on either existing or newly-built buses. There is currently in the pipeline a European Union Directive on bus construction, which would require all newly-built buses from 2005 to have doors. However, this Directive has already been long in gestation and its progression into law (soon, or at all) is by no means certain.

19.10 There are accordingly two related questions: Should the open platform be perpetuated in future (accessible) bus designs? And should Routemasters be kept until the end of their useful life, or replaced early? There are various arguments for and against open platforms in general (Table 2) and Routemasters in particular (Table 3).

For open platforms	***Against open platforms***
You can hop on and off between stops, saving time	Hopping on and off between stops is inadvisable except when the bus is stationary – and the Mayor's proposals are aimed at keeping buses moving.
There should not be a nanny state – people should be allowed to take risks with themselves	They would involve a substantial extra safety risk – thus conflicting with a common key policy of the Mayor and the Committee
They have to have conductors, and so automatically save time at stops	They suffer from the net disbenefits of conductor-operation
They will be popular with some users	

Table 2: The arguments for and against open platforms
(NB: This is just to set out the range of the arguments,
not to comment on their validity)

For Routemasters	***Against Routemasters***
They are popular with users. Retaining the loyalty of existing passengers is vital	They will not assist modal shift of people whose cars give 21st century standards of comfort
You can hop on and off between stops, saving time	Only nimble, able-bodied users benefit from the open platform
You shouldn't pander to minority lobbies. If necessary, Routemasters can be mixed with accessible buses	They are socially exclusive. There are very significant number of people with impaired mobility, some of whom can't use Routemasters at all and others of whom find it difficult
There should not be a nanny state – people should be allowed to take risks with themselves	They have a worse safety record than doored buses – thus conflicting with a common key policy of the Mayor and the Committee
They have to have conductors, and so automatically save time at stops	They suffer from the net disbenefits of conductor-operation
Their cost has been written off – replacing them would cost money that could be used elsewhere	High-floor doored buses are also being replaced before the end of their working lives (and book lives).
They are what the tourists expect	Tourists are only a small proportion of the clientele.
They look 'friendly', 'retro', 'cool'	They look 'uncool', outdated
Nostalgia	Nostalgia has no place in the mainstream transport system of a World City. Preserved bus rallies provide a more appropriate outlet
They don't accelerate/decelerate as fast as modern buses do, therefore a more comfortable ride	The supposed ride quality advantages of Routemasters are actually to do with the driving technique, not the bus itself
	Hopping on and off between stops is inadvisable except when the bus is stationary – and the Mayor's proposals are aimed at keeping buses moving
	The opportunity to increase farebox income (as experience of low-floor buses in some areas has suggested) is lost
	They are cold and draughty

Table 3: The arguments for and against Routemasters
(NB: This is just to set out the range of the arguments,
not to comment on their validity)

19.11 On balance, the Committee believes that the Routemasters should be retained until the end of their working lives, in view of the fact that they are an existing resource and that they are popular with their users. However, their lack of accessibility must be addressed by ensuring that accessible buses (and bus stops) are used on parallel routes.

19.12 However, the Committee believes, on balance, that the open platform should not be perpetuated in future bus designs, particularly in view of the increased safety risk arising from that feature.

20 Towards the decently modern Underground

20.1 The future funding of the Underground (4C.20 to 4C.44, and Annex 2) should have been resolved for better or worse within a matter of weeks, and long before the Strategy comes into force (unless the issue goes before the courts). In any case, LTUC has taken no position on the respective merits of the two concepts, but instead stressed that the important issue for passengers is what the improvements consist of and how they are measured.

20.2 This remains as unclear as ever. The Strategy offers a few proposals for performance and capacity levels, but it is not clear how these relate to ensuring the long-term health of the network. It seems that not even the Underground itself knows the extent of the problem (Policy 4C.3).

20.3 It is also important that the future contractual and managerial arrangements allow TfL to react adequately to unexpected events, including any under-delivery of particular projects or standards.

21 Making the National Rail network work best for London

21.1 The Committee is heartened by the Mayor's acknowledgement of the importance of the National Rail network to London's transport needs. The Committee welcomes the Mayor's intention to make use of his powers to issue instructions and guidance to the SRA. It will be needed. His endorsement of the London Metro concept, which is vital to making the best use of the system, is also warmly welcomed.

21.2 However, the Draft Strategy omits a number of other important issues for London. These are as follows.

Small-scale projects

21.3 There are a number of small-scale proposals (Table 4) for new stations or simply new platforms that would bring substantial benefits either to local areas (through improved access) or to London as a whole (through improved interchange). They have long been mooted, or even worked-up, and a few are currently making progress of some sort.

Location	Scheme	Benefits
Brixton	High-level platforms for South London Line services	Key bus & tube interchange and town centre currently missed
Brockley	High-level platforms for Nunhead line	Improved east-west journey opportunities, and potential interchange (particularly synergetic with East London Line extension)
Camberwell	New station	Serving a rail-starved area
Eastfields	New station	Serving Mitcham town centre
Junction Road	Re-opened station on Gospel Oak – Barking line	Improved journey opportunities, and potential interchange with Northern line at Tufnell Park
Loughborough Junction	Platforms on Eastern arm of triangle	Improved journey opportunities
Shepherds Bush	New station on West London Line	Key bus & tube interchange and town centre currently missed
Willesden Junction	1. Platforms on connection between West London Line and West Coast Main Line (former Goods Lines) 2. Platforms on slow lines 3. Extensions to high-level platforms	Key orbital and radial rail/bus/Underground interchange currently missed by (1) Connex Watford-Gatwick trains, (2) Silverlink County trains and (3) Anglia CrossLink trains respectively
Haverstock Hill, Finchley Road, Brent Cross, Broadfields/Scratchwood	Potential new stations	Better local access to rail network (particularly synergetic with a Metro-style Thameslink service)

Table 4: potential small schemes

21.4 The Mayor makes no reference to these. Yet they are an important opportunity to make much more of the system in the medium term at moderate cost. They would particularly support the Mayor's objectives of integration, social inclusion, and regeneration. The Strategy should assess and prioritise these, and consider the extent to which the Mayor can encourage (and contribute to) their implementation.

Resolving the competition for capacity between inner-area and outer-area services

21.5 The Mayor needs to take a view on the correct balance between Metro, regional and inter-city services when capacity is scarce. On many routes, in recent years, regional and inter-city services have seen substantial frequency improvements, but these have not always been matched by improvements in the shorter-distance services. The former are often at an acceptable frequency, but the latter have been left behind and often fail to perform the walk-on function they should. The aspiration for frequency improvements under the London Metro proposals will only rectify this if sufficient capacity is available for Metro services and is allocated to them. The Committee therefore believes that, in general terms, the first call on any remaining (or new) capacity should be for the local services.

21.6 There are also specific issues about peak-time links. Priority seems to be given to getting outer-area commuters into central London. As a result, some inner London stations (e.g. South Bermondsey) have a worse service in the peaks than off-peak. Similarly, some important inner-London or outer-London connections are reduced in the peaks (notably links from outer areas to, or via, Wimbledon, Clapham Junction and Orpington, and the Charing Cross to Croydon link). These problems can inhibit employment opportunities and regeneration in those areas, and also contribute to congestion in the inner area and at central London stations.

Outer London interchange

21.7 For many longer-distance journeys to or from suburban London, the quickest route is via central London, often involving an Underground journey. This contributes to the pressures on central London that the Mayor has identified, and also adds stress to the passenger's journey. Some outer-London (or beyond London) interchanges allow this to be avoided, by connections into local services or bus/light rail routes. TfL should investigate the opportunities for enhancing the utility of such interchanges (particularly through timetabling issues), and come up with a policy that is logical and achievable.

21.8 There is a similar issue about encouraging cross-London inter-city routes. It is much the same principle as with Cross-Rail or Thameslink 2000, but addressing other routes and longer-distance traffic. These will also assist with longer-distance journeys via London, relieving pressures on the central area and also providing a boost to the outer London areas that are served. TfL should encourage these as a secondary priority (i.e. to the extent that capacity can be made available for them *after* satisfying the needs for local services. Current examples are Anglia CrossLink and the Virgin trains via Kensington Olympia. Capacity is a real problem here – notably, Virgin had plans to run an hourly service via Kensington Olympia, but because of capacity constraints it will be reducing the number of trains on this route to just one per day.

21.9 With the construction of Airtrack, Heathrow Airport can have a major role as an interchange – both for inter-city services (perhaps including international ones) and local services, although the latter need to take priority.

Optimising path allocation and use

21.10 The Mayor is right to support, in principle, the development of rail freight, but also to recognise the difficulties that this brings in London (4K.18). The Mayor needs to ensure that the rail network is optimised for London's passengers. The Strategy refers to freight that passes through London and rightly seeks to encourage by-pass routes (Proposal 4K.7), but this is only part of the story. There are other issues that make life difficult: unused freight and Regional Eurostar paths to which the operators concerned are contractually entitled, even if they do not use them. This unused capacity is a thorny issue that the passenger operators can do nothing about. It may be that the clout of the Mayor can assist in rectifying the situation. It may involve buying out those rights (if, of course, that represented good value-for-money).

21.11 The strategy also omits to mention a number of fill-in electrification schemes that have been proposed to maximise network synergy or to remove some of the constraints on London's rail services. These include Gospel Oak to Barking (including the link to the East Coast Main Line) (moving freight off the congested North London Line, plus potential synergy with other orbital passenger services), Willesden to Cricklewood (diversionary route), and Kew to Acton (diverting empty Eurostars from the West London Line). Again, there may be opportunities for TfL to encourage (or buy) further benefits for London, beyond those that the SRA will fund.

TfL's approach

21.12 It is disappointing that (in the Committee's experience) TfL has, in practice, so far been less than fully enthusiastic in getting involved in National Rail issues. The Committee hopes that this will improve in future, because TfL is well placed to ensure that the network works best for London and integrates well with London's other systems. As part of this, TfL should ensure that the SRA's refranchising process fully addresses London's transport needs, and does not just take forward the schemes which bidders have chosen to emphasise.

21.13 In particular, TfL could give a major boost to the small-scale proposals listed above (para. 21.3) and other potential 'quick wins' (e.g. the Chiltern Metro proposal), by bringing together the players involved and helping to kick-start the schemes.

22 National Rail service quality

22.1 *Problem:* Despite some examples of good practice, London's National Rail operators have proved themselves unwilling or incapable to consistently provide a high standard of service – often even failing on the low-cost, short-term basics such as cleanliness and information posters. The improvements in these areas that were supposed to arise from privatisation (a commercial incentive to improve the product, its retailing and its marketing) have only occurred patchily. High standards, consistent across the network, will be important in achieving modal shift.

22.2 *Analysis:* There is nationally, in practice, a noticeable contrast in station and on-train standards between PTE areas and non-PTE areas. In the former, specific service requirements are laid down by the PTE within the franchise agreement, and monitored under an incentive regime (known as the 'Service Quality Incentive Regime' ('SQUIRE') system). In the latter, there is only a weak set of vague requirements, with monitoring seemingly only carried out by SRA staff on occasional walkabout and with no realistic penalties for failure anyway. It is not surprising that PTE areas generally have a far higher standard of service (in terms of both what is required and what is delivered) than elsewhere.

22.3 The SRA criticises SQUIRE as producing 'bureaucratic micromanagement', and intends only to use customer satisfaction indicators (CSIs). CSIs are of course vital, and welcome, but they are not enough on their own. They are a very blunt tool. It appears that the only real incentive on the operator will be the 'nuclear option' of non-renewal of the franchise at review points. Nor will reliance on CSIs ensure *consistency* of standards, which the Mayor rightly requires.

22.4 Accordingly, it seems that the way to get the high standards is through a PTE-style incentive regime. But experience so far in the current refranchising process suggests that this is not an issue that the SRA will take as seriously as it deserves. And in any case, the Committee does not have full confidence in the ability of the SRA (a national body which understandably focuses on the big picture) adequately to consider (and unilaterally specify for) the particular needs of London's complex and (hopefully) integrated transport system.

22.5 *Recommendation:* The Committee therefore believes that TfL should procure such a regime from operators via instructions to the SRA. SQUIRE could be a useful starting-point, adapted to London's needs and to the Mayor's aspirations (the Committee would be happy to assist), along with LUL's own standards. If these requirements are reflected in bids for franchises being priced-up, then TfL may need to pay for it, so that the SRA's budget is not adversely affected. This would be money well spent.

23 Performance indicators and targets

23.1 The Mayor makes a number of suggestions for performance indicators and targets (4C.5 to 4C.12, 4C.45 to 4C.47, and 5.40 to 5.47), and acknowledges that further work will be needed to develop them (Proposal 5.6) Many of the Mayor's suggestions are along the right lines, and are therefore welcome. But others, notwithstanding that further development is needed, appear to be poorly thought-out, or to be measuring inputs rather than outputs. The Mayor needs to ensure that the overall approach to the indicators and targets is fully coherent and justifiable.

24 Charter provisions

24.1 The Strategy makes no mention of Passengers' Charter rights. These (if they work correctly) have two important beneficial functions: to further incentivise operators to get the service right, and to give passengers compensation for having suffered a poor service.

24.2 The charter rights currently vary dramatically by mode. The best system is the LUL one, which refunds the cost of a journey after a 15-minute delay that was the Underground's fault. The National Rail operators typically have somewhat tokenistic partial refund arrangements for single or return ticket holders, and a system for season ticket holders that is Byzantine in structure, capricious in effect, and incomprehensible to the average passenger (although the SRA expects to improve on these for refranchised operators). Bus passengers are worst off, for the bus company will merely 'carefully consider whether or not you should get compensation'. Efforts to persuade LT to include a less grudging commitment to passengers have made little headway (interestingly, a number of bus operators outside London choose to offer serious compensation standards, believing it to be a good selling-point for their services).

24.3 In an integrated transport system, these differences appear arbitrary and unfair. Many passengers are justifiably aggrieved when they too often get little or no recompense for having been let down by the transport operators. The Mayor should require TfL to consider the extent to which the various regimes can move towards the Underground's system, which is a simple and effective model that the Committee commends.

25 The boroughs

25.1 The Mayor is right to say (5.27) that the London boroughs are vital to the implementation of the strategy, particularly in relation to buses, walking, cycling and parking. It would be courteous to also acknowledge the contributions that boroughs already make, both individually and in sub-regional partnerships, to improving London's transport – often putting their money where their mouth is.

25.2 However, experience has shown that not all the boroughs can be relied upon to implement all the measures that the Mayor desires. Too often, boroughs are deflected from transport measures by parochial concerns, often ill founded. The classic example is of bus priority measures, which are sometimes watered down by Boroughs. The Mayor's (laudable) proposals for bus stop clearways are already being opposed.

25.3 The Committee therefore strongly supports the Mayor's willingness (Policy 5.3) to issue directions to the Boroughs if necessary.

26 Speaking on behalf of users

Is anyone listening?

26.1 The need for a passenger focus (4A.14) is unlikely to be disputed by any of the bodies charged with implementing the strategy. But they have historically taken varying attitudes to the extent to which they can know users' needs without consulting the users themselves. Many authorities and operators still pay only lip-service to the idea of consultation, or simply don't bother with consultation at all. (Is it churlish to list the questionnaire in the 'Highlights' document, with its meaningless questions, as an example of another failing: not consulting in a way which will generate meaningful answers?)

26.2 The Strategy rightly points out the importance of involving users in the decision-making process, including active consultation (3.14 to 3.17). But this is not backed up by a policy (Policy 3.2 refers only to the Mayor).

26.3 Even then, experience has shown that encouragement and policies are not always sufficient to ensure that the voice of the user is heard, let alone seriously considered. The extent to which, in practice, the Mayor allows operators to ignore that voice will be crucial.

Where are we?

26.4 Nor does the Strategy mention LTUC, which has a unique statutory role. In particular, the Committee's status gives it an ability to see the overall picture (rather than merely furthering parochial or single-modal interests), and the more clued-up operators acknowledge its expertise, and its constructive and reasonable approach to issues. It would be as well for the other operators to realise this too. No doubt the Mayor will be willing to make this clear, and to instruct TfL to lead by example. (The Mayor will no doubt also wish to make it clear that LTUC will be invited to assist with the various advisory groups etc. that are signalled in Proposals 4J.4, 4K.1, 4N.2, 4O.3, 4G.30 and 4P.1).

Where are they? Who are they?

26.5 The Committee strongly supports the existence of user groups and other local organisations, and their role in providing a way of voicing detailed local concerns, and in informing the Committee's own work. It is therefore disappointing that the Strategy makes no reference to these organisations.

26.6 Furthermore, the strategy is rather unbalanced about the role of other user voices. It proposes London-wide and local accessibility forums, but does not explain what the London-wide forum will do that the London Mobility Advisory Panel is not already doing.

26.7 Similarly, the strategy proposes 'social group and issue-based forums' (Proposal 3.3) at the London-wide and Borough levels. But it does not explain what these will do that cannot be done (or is not being done) by the many existing organisations.

26.8 The apparent ignorance of Boroughs' own existing transport forums is particularly worrying. These should be encouraged, as they often include a wide membership representing various particular groups of people, and fill two particular gaps:

(a) to provide a user voice for the transport facilities that the boroughs themselves provide; and

(b) to provide a further, and more localised, user voice for problems in which users and boroughs have a common interest, or for which operators and boroughs need to be called jointly to account, or which involve detailed local issues that LTUC is not resourced to monitor consistently.

27 Presentation

27.1 The final version of the strategy should:

(a) eliminate the characteristic repetitiveness (both locally and between chapters) of the draft;

(b) include a summary table of the Mayor's proposals, showing in each case the lead body, targets, timescales, priority level, analysis of costs and benefits, and (quantitative) contribution to the strategy;

(c) adopt a more consistent level of detail;

(d) adopt a numbering system that does not confuse policies and priorities with paragraphs; and

(e) have an index.

Part B

TOWARDS A VISION

This is an initial attempt to define the level and quality of London's transport services that should be aimed for. It is probably not complete; it is certainly not set in stone.

London's transport planners have standards of their own, couched in technical terms. No doubt this vision can be even better expressed in such terms. The point here is to show the sort of transport system that the Committee believes the Mayor's objectives rightly require, and towards which the operators and other agencies should be working.

This section should therefore be seen as a set of steps to achieving the Mayor's objectives. A vision along these lines would inspire the action plans on individual topics, whose targets would represent either the relevant facet of the vision or staging points towards the vision.

The vision does not cover aspects of service provision where there can theoretically be 100% performance, such as punctuality or user satisfaction. For these attributes, the theoretical aim is, of course, a 100% score, but that is not very helpful in practice. Incremental targets will still need to be set.

The vision follows from the Committee's beliefs that:

- accessibility, safety and security for all transport users within and into/out of London should be maintained and enhanced;
- there should be a presumption in favour of greater use of public transport, and a reduction in the use of private transport;
- transport provision to reflect planning policies and population growth should be primarily met by public transport; and
- transport users should have adequate local access to public transport facilities.

Service availability

All locations

All housing and employment locations in London to be within *XX* metres and *XX* minutes* of access to public transport which offers the following minimum facilities:

- Direct service to a local shopping centre (defined by having a main post office, banks and a major supermarket). Hours of operation: 0700 - 2100 (Sundays 0800 - 1800). Frequency: at least every 12 minutes.
- Direct service to regional centre (defined by having a main post office, banks, a major supermarket, a good selection of multiple retailers [e.g. Marks & Spencer, Dixons] and a significant entertainment facility [e.g. cinema, bingo, sports / leisure centre]). Hours of operation: 0700 - 2400 (Sundays 0800 - 2400) – later services to operate where there are late-night attractions. Frequency: at least every 12 minutes.

- Service to Central London (defined as Zone 1 north of the river) requiring no more than one interchange between bus / tram and rail / underground and no more than two interchanges in total. Hours of operation: 0500 – 0100 (Sundays 0800 – 0100).

Also all-night service connecting local shopping centre and Central London (may be by different mode from normal service). Frequency: at least every 15 mins.

(* The time taken to access public transport comprises a walk time (to the access point) and a waiting time (for the vehicle to arrive). There can be trade-offs between the two elements (see 5.45 in Part C). However, there are limits to what is acceptable for each element, which is why maximum walking distances and minimum frequencies also need to be specified.)

Social and leisure facilities, where not covered above, to have services at least every 15 minutes during opening hours, connecting with the rest of the network as appropriate.

Airports with scheduled air services to have public transport access at all times that are required by staff or passengers (this will be around the clock at the principal airports).

Rail & Underground

All journeys which are possible in the off-peak to also be possible throughout the peak.

Cross-boundary services: no services to be less than every 30 minutes.

All stations to be open every day and for full duration of service.

River

All riverside locations between Woolwich and Chelsea to be within 10 minutes walk of a pier served by a riverbus service. (In recognition of the relatively low use such a service is likely to attract, and the adverse speed implications of calling at all piers on all journeys, this could operate on a pre-booked / hail and ride system and charge a premium fare.)

Taxi

Maximum waiting time for a taxi at [key locations, such as main line termini] to be *XX* minutes [may vary between locations or across time]. [NB London-wide waiting time standards would probably be unmanageable, given the indirect nature of TfL's control over taxi provision.]

Quality of access points and interchanges

All public transport access points and interchanges to provide the following:

(a) Weatherproof shelter (heated at key locations [to include all rail/tram stops and key bus stops]).

(b) Real-time information for all modes.

(c) A help point (for information and for emergency assistance).

(d) Unassisted step-free access (derogations, e.g. for Underground stations, to be individually justified) within the facility and to/from the street.

(e) Secure cycle parking at key locations [to include all rail/tram stops and key bus stops].

(f) Layout and information to be fully accessible (i.e. to meet the relevant design standards).

Bus stops to have at-any-time clearways to London Bus Priority Network (or successor) standards.

All rail and Underground stations to be staffed every day and for full duration of service.

All stations to have a fully accessible toilet on the premises (or within the interchange complex, if part of one), open at all times the station is open. Toilets to be attended at main locations.

Journey time

Peak journey times to be no more than *XX*% longer than journey times when roads are at their least congested (e.g. early Sunday morning). This requirement should define the division of road space between buses / trams and other road users.

Where frequencies are less than every 10 minutes, timetables to be on a standard clock-face pattern at all times, every day. Peak services should involve these 'standard' times plus whatever extra services are needed.

All bus queues to be cleared by the first bus, or within 10 minutes (whichever takes longer).

Cross-boundary services: local shopping centres and regional centres with a hinterland in the adjacent county to be serviced to the London standard regardless of the boundary.

In-transit service quality

Standing

Standing only to be acceptable on peak-time rail services, for no more than 20 minutes.

Rail

All inter-city routes to provide at least hourly connections with appropriate Metro and regional services, so as to minimise the need to double-back via London terminals.

All trains to have toilets.

Door-to-Door

Special services for passengers unable to use mainstream public transport shall be in accordance with standardised eligibility criteria and service levels throughout London.

Walking

All road junctions to be capable of being crossed safely without using subways or bridges.

All roads of four or less lanes to be capable of being crossed safely in one go.

Where road crossings require pedestrians to deviate up a side street, the deviation to be no more than *XX* metres.

Part C

PARAGRAPH-BY-PARAGRAPH COMMENTS

Chapter 2: Challenges – the context

Paragraph	*Comment*
2.1	The comment about decreasing reliability may or may not be true (please show us the evidence), but if it is true it is inevitable. On any system, some parts improve and some deteriorate, in part according to the timing of tranches of modernisation. (That is why the reliability of the Chiltern lines has dramatically improved over the decade.)
2.3	This means that 68% *were* satisfied with the Underground, 66% were satisfied with buses, and 64% with National Rail – satisfaction levels that most politicians would dream of! The Mayor's sentiments are right, but the Strategy should acknowledge that many Londoners are nonetheless happy with those systems. .
2.10	What is driving these population changes, and what will do so in future? Will the Mayor's transport policies (e.g. differentials in fare or service levels in different areas) have any effect on them?
2.20	There is also the gradual extension of opening hours for shopping and leisure facilities, which is also driving up demand for travel at hitherto quieter times.
2.23	The Mayor's aspirations rightly include giving London a transport system that maximises the quality of life of its citizens (Executive Summary, Para. 1). Quality-of-life surveys give their prizes not to the Strategy's chosen comparators, but to Vancouver and its ilk. Is it possible to have a quality of life at the top of that league, while still maintaining World City status?
2.25	These other developments may well be models for London to follow. But describing them in the 'challenges' chapter is perhaps a sign of envy ('keeping up with the Joneses'), rather than a sign of coherent analysis of problems and solutions. Paris, Tokyo and London have different historical inheritances that have produced different problems. For example, Paris's Metro system that served only the city centre is not a problem that London has needed to overcome. As it turns out, coherent analysis *has* suggested large-scale solutions to London's rail deficiencies which mirror the solutions that have been adopted for Paris's and Tokyo's problems. But this section is specifically about competitiveness. The Mayor needs to show the evidence that these large-scale projects, rather than any other set of priorities, are the way to get the 'quality of transport' that businesses require.
2.29	Third bullet point: also putting unnecessary pressure on central London.

2.30	Absolutely right, but it is not properly carried through in the Strategy. The one-third who travel from outside the (arbitrary) Greater London boundary are vital to London – and policies for London must take account of their needs too. London's transport planners must not only influence policy decisions on the other side of the boundary, but also recognise that investment in the London system may actually involve places on the other side (e.g. cross-boundary buses, Croxley Link). But the strategy fails to reflect this vital issue. See Part A.
2.32	As with 2.30, absolutely right, but it is not properly carried through. The strategy refers to links to airports and the Channel Tunnel, but there is little consideration of what London requires from the national transport networks (main roads, railways and coaches). The Mayor must be prepared to influence decisions about national links – after all, one of the reasons for the existence of the Mayoralty was to provide a voice for London.
2.38	They are also concerned about the early close-down of many evening National Rail services, which render them useless for clubbing or gigging, and in some cases useless for theatre-goers or concert-goers. This applies not just to central London – there are clubs all across the suburbs.
2.39 and 2.41	These paragraphs point to a substantial public disbenefit from the retention of Routemasters.
2.43	This paragraph is good in stressing the primacy of road modes as a source of danger. It would be improved by some comparative data for bus and rail safety, to emphasise the point. But the current graphs (Figures 2.5A and 2.5B) could be very misleading to casual readers, because they are not normalised to show relative exposure rates (per kilometre or per hour or per trip).
2.44	1. The first three sentences are fine (and the first one is a point which needs to be made). But the fourth one is factually wrong. It directly contradicts what Uff said (see paragraph 15.18 of his report) – he did not accept that privatisation was a contributory factor. He merely instanced two areas in which fragmentation had caused problems. 2. The reference to the MORI poll is utterly obscure. Were the 56% being asked about safety? Were they being asked about it in a PPP context? And how could they possibly know what the safety arrangements under PPP would be? The credibility of the strategy is undermined by this misquoting and selective use of statistics.
2.52	And an undue need to travel via Central London.

2.57	1. This description of PIXC is misleading – but if anything, by understating the problem. The PIXC regime is complex, and the Mayor should seek advice from SRA on the details. There are two thresholds: 3% is for AM and PM peaks combined, and there is a 4.5% threshold for each peak on its own. These are at the TOC-by-TOC level (not TOCs' individual routes, as the third sentence suggests). As well as the four breaches of the 3% figure, there were three TOCs in breach of the 4.5% threshold in the AM peak. But, as the penultimate sentence correctly suggests, figures are produced for groups of routes within each TOC (often 'inner ' and 'outer'). These are more relevant to individual passengers' experiences, and would provide greater justification for the Mayor's concerns. How about a suitable graph or map to make the point (especially if the full explanation is too long to go in the text)? 2. But the most fundamental point is that the Mayor seems to be accepting the PIXC breaches as defining what is unacceptable. Is this intentional? See comments about 2.58. 3. The PIXCs measure peak-time with-flow overcrowding at the London end of the journey. This means that they essentially cover people travelling to central London. 'The London market' presumably means the employment market, in which case the outer area services 'primarily serve the London market' too. 4. The disruption arising from speed restrictions imposed after the Hatfield accident and the subsequent flooding is irrelevant – it is a unique and temporary situation, and things will be back to normal by the time the strategy comes into force. It is possible that there will be milder longer-term effects (e.g. changed maintenance practices resulting in an increase in planned engineering work and resultant disruption), but so far this is unclear.
2.58	Absolutely right. But the strategy does not go on to say what the Mayor thinks *can* be accepted in a modern World City. The opening sentence, which is perfectly true, suggests (rightly) that there should be consideration of what level of spare capacity should be available to deal with this disruption. There is none. The 'capacity' in PIXC includes an allowance for (what the SRA implicitly accepts as an acceptable number of) standing passengers. This turns out to represent (on sliding door stock) about one in four passengers standing. (Furthermore, the 3% / 4.5% is an *intervention* threshold – it means 3% / 4.5% above this 'capacity' figure.) Many passengers (especially those who stand every day) would contend that even the 'acceptable' capacity is unacceptable. The Strategy should set out what the Mayor believes on this issue. What level of standing is acceptable in a World City - in normal circumstances and in disruption? What reduction in standing is it cost-effective to buy? What spare capacity (to cope with disruptions without overcrowding) is it cost-effective to buy – or is it more effective to buy reliability instead? The Strategy identifies the problems well, but fails to set the standards that the Mayor aspires to (i.e. the criteria for success). This lack of vision is crucial. The policies in the rest of the strategy appear to be just miscellaneous attempts to improve the situation. There is no target for the planners to aim at.

2.64	1. The word 'reliability' seems to be used here in the colloquial sense of trains being on time, rather than in the specific sense (used in National Rail statistics) of cancellations. The Strategy needs to be consistent in its terminology. 2. On either basis, reliability had indeed reached 'crisis levels' on the National Rail network, but this is a result of the speed restrictions imposed after the Hatfield accident and of unusually severe flooding. The situation will be back to normal by the time the strategy comes into force. This throwaway comment is therefore irrelevant. It is possible that there will be milder longer-term effects (e.g. changed maintenance practices resulting in an increase engineering work and resultant disruption), but so far this is unclear. What *is* relevant, however, is the trend in punctuality (excluding the temporary effects), which has been falling slightly from its 1997 high.
2.65	It is not clear what is meant by a 'state of good repair' – one that makes the Underground attractive (e.g. by plugging the leaks and retiling the corridors), or just a steady-state infrastructure that's not getting any worse?
2.68	See Part A for a discussion of the 24-hour, 7-day city
2.71	'London's buses, Underground and National Rail services… often have poorly co-ordinated service timings' is a sweeping statement that misses the real issue. Most services operate at such high frequencies that co-ordination is un-necessary. The real issue is with the infrequent services – such as with bus-rail timetable co-ordination in the outer, more rural reaches of London.
2.72	There is also too much need to travel via Central London at all. The Strategy needs to enhance routes that allow avoidance of this for cross-London journeys.
2.74	The Strategy correctly identifies the issue about cycles, but does not mention the conflict in the peak hours with the stated need (2.58) for more train capacity for passengers. Nor does the Mayor make any proposals in the later chapters. The Mayor needs to take a view.
2.75	Does the Mayor consider that public transport should attempt to match these advances made by car manufacturers? Or does the Mayor believe that public transport can never match the car for comfort and quality, and that operators/funders should therefore prioritise other issues?
2.79	1. The average travel time to work in central London is not wholly a function of congestion, as the end of this paragraph suggests – it is fundamentally due to the long-distance nature of London commuting. 2. The Strategy should also recognise that central London and its fringes have a growing residential population, including pockets of relatively severe deprivation (e.g. the Golden Lane estate in the City). Transport in central London needs to address their requirements too.
2.89	The intention behind the sixth bullet point (National Rail services not stopping) is unclear. Does this refer to a lack of calls at places like Finsbury Park, Clapham Junction or Lewisham in longer-distance trains (a problem which the Committee may sympathise with), or is it a suggestion that all trains should call at all stations (which the Committee would oppose)?
2.94	Yes, but the Strategy does not make it clear why the lack of off-peak National Rail services is a problem. In fact, the main problem is two-fold: the unattractive frequency overall on some routes, plus more widespread deficiencies in the evenings, at night and on Sundays). There are also specific instances of off-peak overcrowding (notably some late-night trains and some that serve sporting events).

Chapter 3: Linkages

Paragraph	*Comment*
Policy 3.1	And partnership with users too. Putting users' needs first is not just about 'ticking the box' to show that consultation has taken place. it is about dialogue, understanding of needs and constraints (on both sides), and recognising the expertise that can be drawn on (again, on both sides).
3.15	Quite right, but understanding of what users *want*, as well as what they *do*, is also needed – for example, in understanding the journeys that are desirable but are not made because the service is unsuitable.
3.16	See Part A for a discussion on the need for explicit reference to LTUC.
3.17	The principle is supported, but it is not clear what sort of initiatives TfL has in mind. Environmental improvements? Volunteer monitoring patrols? Support for user groups who want to market their lines themselves? Funding for local campaign groups to commission feasibility studies or market research?
3.18	See part A for a discussion on school travel. Perhaps local authorities should be required to have green travel plans, as an example of what can be achieved (and they are major employers anyway!).
3.20 to 3.26	See Part A for a discussion of these issues.
3.31 to 3.35	This underplays the importance of the suburban town centres – see Part A.
3.33	Agreed, but the Strategy needs to show how the Mayor will (or can't) encourage this.
Policy 3.7 and Proposal 3.3	See Part A for a discussion of the user voice.
3.44 and 3.50	The supposed net health benefits of walking and cycling over car use are not as clear-cut as may be instinctively supposed. Car drivers who switch to walking or cycling get a health disbenefit by virtue of their increased likelihood of being killed or injured. The health benefits are mainly to older cyclists (as older people are more prone to heart attacks etc.), but the safety disbenefits are mainly to children (who are more likely to be involved in accidents). The British Medical Association has attempted to calculate the net effect, and reports that the calculation is difficult to make, but that (on balance) there does indeed seem to be a net benefit. Proposal 3.6 is welcome, provided that the Health Impact Assessment works on a basis of coherent appraisal, informed by research, rather than on the basis of truisms.

Chapter 4A: A Balanced Transport Network

Paragraph	*Comment*
4A.1 and 4A.2	This section repeats what has already been said, and is superfluous.
4A.8	This repeats the previous paragraph.

4A.9	1. The 'unprecedented crisis', which presumably means the disruption to performance that was caused by the speed restrictions imposed after the Hatfield accident and by the Autumn flooding, is a temporary situation which will be eliminated by the time the strategy comes into force. It is possible that there will be milder longer-term effects (e.g. changed maintenance practices resulting in an increase in planned engineering work and resultant disruption), but so far this is unclear. 2. '…measures to reduce overcrowding…' means making *less* use of the capacity, because each carriage contains fewer people! Presumably the Mayor actually means '…measures to accommodate more passengers…'. But the Strategy is on potentially controversial ground here. What measures does it propose to maximise capacity? Removing all the seats in the trains would make the most of the capacity, but this would be a most unpopular policy. At what point does the Mayor believe that any further measures to squeeze more passengers in are unacceptable, and that new capacity is the only solution? And because new capacity takes longer to introduce than measures to maximise existing capacity, are there trade-offs that the Mayor is willing to accept for the short term only?
4A.10	The principle of optimising the road network for movement of people and goods, rather than vehicles, is strongly supported. But that does leave the conflicts between people and goods (especially for kerbspace). That is glossed over here, and not fully addressed in later chapters.
4A.12	The Strategy is probably right that new capacity (as opposed to making the most of existing capacity) is needed. But it is not 'clear' – the Strategy gives no analysis to show this.
4A.14	See Part A for a discussion of the user voice.
4A.15 *et seq*	The headings in the following sections bear little relation to the text.
4A.18	But there is a conflict between the hopeful users of roadspace (including the 'dummy user' of reduced congestion). The Strategy seems to be promising everything here – if so, then (at best) everyone will benefit but only slightly!
4A.23	But there is a limit to what can be done in the short term to aid reliability. Much is medium-term – such as even minor infrastructure improvements.
4A.26	This seriously misinterprets, and undersells, the Metro concept. It's not just for journeys into central London. In fact, the journeys into central London are what the network currently does best. The Metro concept is principally aimed at journeys *within* inner and outer London – both by making better use of the existing orbital routes, and by creating the proposed new orbital routes.
4A.28	1. See Part A for a discussion of the relationship between staff shortages and recruiting extra conductors. 2. Sixth bullet point: also franchise extension (which is like a shorter-lasting version of replacement).
4A.29	Surely the Mayor aspires, in a World City, for *all* bus routes to be high-quality? The Committee certainly does.

Chapter 4B: Fares and Tickets to make public transport more attractive

Paragraph	*Comment*
4B.1 to 4B7	See Part A for a discussion of fares policy.
4B.4	This sweeping statement needs to be justified. Which measures of quality? Over what timescale? The statistics can be used (selectively) to back up any number of views on what has been happening. The Mayor needs to show why his view is soundly based.
4B.11	There is potential tension between the RPI-1% system of regulated commuter fares on the National Rail network, which the SRA plans to continue, and the Mayor's RPI-tracking proposals for the Underground, because the two sets of fares are linked through Travelcard. The policy differential will also have to be addressed in any unification of the fare system.
4B.12	It should be made explicit that Travelcard is a key part of making the fare/ticketing system attractive, even with the advent of smartcards, and that Travelcard will therefore be retained. The Committee would strongly argue for its retention.
Proposal 4B.2	This suggests that Smartcards are for 'targeted fares options' – there is no policy to reflect their (currently planned, and clearly intended) use as a mainstream ticketing medium.
4B.15	1. See Part A for a discussion of ticketing integration. The Mayor should go further and use his directive powers to work towards fares integration. A unified fares system would assist passengers who currently have to 'learn' two systems. This paragraph and 4B.18 do not go far enough in this respect. 2. The fact that Smartcards are merely 'planned' to be valid on DLR and Tramlink is a legacy from the LT period. The integrated TfL, under a Strategy that rightly rates integration highly, should certainly make Smartcards valid on all TfL modes. See also 4B.21, which is even weaker. 4B.24 is very weak about compatibility. But 4D.5, by contrast, is stronger.
4B.17	See Part A for a discussion of bus ticketing.
4B.18	The (laudable) strength of feeling about ensuring compatibility of ticketing systems is not wholly replicated in Proposal 4B.2.
4B.20	See Part A for a discussion about bus ticketing.
4B.21	1. See Part A for a discussion of ticketing integration. The fact that Smartcards are merely 'an option' for Tramlink is a legacy from the LT period. The integrated TfL, under a Strategy that rightly rates integration highly, should certainly make Smartcards valid on all TfL modes. 2. The aim should be, over time, for tram fares to come in line with bus fares.
4B.22	But there comes a point when the system becomes incomprehensible. The correct balance needs to be struck.
4B.23	This contradicts 4B.9.

4B.24	1. The 'possibility' of compatibility across TfL and National Rail systems is in contrast to the stronger demands in 4B.14 and 4B.18. This compatibility is important, and should be more than just a possibility. 2. There is a need for an all-day one-day Travelcard covering all rail modes (i.e. as per LT Card plus National Rail).
4B.25	The issue of taxi fares to out-boundary destinations (especially from Heathrow) needs to be resolved (see also Part A).

Chapter 4C: London Underground

Paragraph	*Comment*
Policy 4C.2	The reference to extensions here is important , and deserves a paragraph of its own. The Strategy does not otherwise mention the various options for extending the Bakerloo, Northern and Victoria lines further into south London (e.g. to Tulse Hill or Camberwell) which have long been postulated. It is acknowledged that these extensions would require capacity increases beforehand on the existing lines, so as to accommodate the new custom, and that such extensions would have to offer value-for-money. But the strategy needs to acknowledge these options.
Proposal 4C.1	This is, of course, welcome, but why these particular levels? Is it just an arbitrary target, made on the basis that 'they've managed it before'? And is it really achievable in the short term, in the context of infrastructure even further decayed than it must have been all those years ago (as the Strategy points out elsewhere)? And what level of cost-effectiveness will the Mayor require these increases to have before they are sanctioned?
4C.7 and Proposal 4C.2	This proposal is unclear. Does it really refer to kilometres operated (which would mean it overlaps with the previous proposal) or kilometres scheduled? Assuming that the latter is meant, does the Mayor want peak kilometres increased, or off-peak, or both? Or is he after earlier first trains and later last trains? Or could LUL get away with meeting this requirement by merely operating more trains at the extremities of the network (where capacity is not a problem anyway)? The Strategy needs to specify where and when the extra services are needed. What level of cost-effectiveness will the Mayor require these increases to have before they are sanctioned? It is not clear why this particular proposal is qualified by 'safely'. Surely safety is implicit in all of them?
Proposal 4C.3	Why are only delays caused by equipment failures targeted? The cause is irrelevant to the passenger. The fact that equipment failure is the single most common cause of delay does not mean that addressing equipment failure is necessarily the most cost-effective (or fastest) way to reduce delays. The same level of delay reduction will be better specified as an XX% overall delay reduction, and then letting it be achieved in the best manner.
Figures 4C.2 and 4C.3	The legend is meaningless, because people have different perceptions of what 'crowded' etc. mean. Something like 'N% chance of having to stand' is needed.

4C.12	1. The Strategy needs to define what is meant by 'overcrowded' – i.e. how tightly-packed does a train need to be before the Mayor considers it unacceptable? 2. It is now common for off-peak travellers to have to stand in central London, particularly in the tourist areas and in the late evening (the latter having seen sharply increased demand in recent years). This situation needs to be addressed.
4C.17	What is meant by 'successful' underground metro systems? Also, it is inconsistent for the Underground to be described (by implication) as successful when most of this chapter is describing its woes.
4C.19	The users may indeed bear a disproportionate share of the cost. But the Strategy has not yet explained why greater support from non-users is needed.
4C.20 to 4C.44	See Part A for a discussion of the future financing and funding of the Underground.
4C.24	1. But the NAO also said that LUL had undertaken a thorough process in evaluating the costs of the public sector and PPP options, and (by implication) that the case for PPP had not been disproved. It found that there is inherent uncertainty in modelling the costs of London Underground over 30 years, and that the financial models alone would provide only limited guidance as to the most likely cost of a public infrastructure operation. There is uncertainty over the most appropriate financing approach, because financial analysis does not cover all the factors affecting value for money – such as safety, bidders' ability to strike a timely and acceptable deal, and the importance of developing a genuine partnership. At the end of the day, it seems, the need for political value judgement cannot be avoided. 2. The Government has said that the Health and Safety Executive (HSE) will have to be satisfied with the PPP arrangements before it goes ahead. If the Mayor does not trust the HSE's judgement, the Strategy should say so, and should explain why.
4C.25	The final sentence is very out of place. The intensiveness of the train service really only affects the risk of rear-end collisions. This particular risk is managed, on the Underground, by a trainstop system (a low-tech form of automatic train protection), and so the situation is not comparable with that on the National Rail network. Secondly, there is far more to safety than this – the platform-train interface, falls on escalators, vandalism, etc.
4C.45	Final bullet point: accessibility is not just about step-free access. For wheelchair users (as the bullet point seems to be considering), there are also issues such as platform-train gaps, manoeuvrability on-train, ticketing facilities at a suitable height, etc. Then there are the requirements of other people with impaired mobility, too.
4C.46	Are Underground passengers therefore less satisfied than those in Paris, New York or Moscow? That is the key measure. Do such statistics exist for those other cities?
4C.47	This repeats the ground covered in 4C.9 and 4C.10.
Proposal 4C.6	Even assuming that it is possible to find comparable Metros (including ones with so many flat junctions, etc), there is the perverse prospect of Londoners' transport being allowed to get worse merely because Paris's or Berlin's does. Furthermore, this target is very arbitrary. It's not clear why we have to be *as good as* these – surely there are some situations in which the quality and performance aspiration is to be better than the 'competitors'? And what level of cost-effectiveness will the Mayor require from measures that are aimed at meeting these targets?

4C.48 to 53	Station congestion and on-train congestion are linked, because people flow between stations and trains. Train capacity upgrades will add to the problems of dispersing outgoing passengers from stations (e.g. at Covent Garden, Tottenham Court Road). This does not seem to be recognised in the proposals.
Proposals 4C.9 and 4C.10	What is to be the priority between the two lists if there is not enough money to complete both?
4C.54	The overall sentiment is right, but the first sentence is quite inappropriate. It is not the fault of the Underground's current managers that their predecessors from the 1860s to the 1970s, who built the system, had the wrong attitude to accessibility. Indeed, the Strategy goes on (in 4C55) to list things the Underground is already doing or planning to do, and (in Proposal 4C11) endorses the Underground's current proposals for a core accessible network!
4C.55	1. The list of 'measures planned' is incomplete , and includes much that has been done already . Real-time information already exists in most locations. Three of the lines already have both visual and audio information on trains. The Strategy would have greater credibility if it distinguished between the existing measures that need to be more widely applied, and the new developments that are needed. 2. Integration with the introduction of low-floor buses: is this over-egged? Almost half of London's buses are low-floor already, and (according to 4F32) the rest will be low-floor by 2006-2009. The stations programme is, realistically, likely to take decades and won't bear fruit for several years, by which time there will be few non-low-floor routes. It will be more important to integrate with the accessible parts of the National Rail network, where full accessibility is likely to come more slowly than on the buses.
Proposal 4C.11	The plan to be developed by TfL should also include the other improvements that are referred to in the proposal.
4C56	This is very muddled. On the national rail network, there is a 3-way split of function between (a) train operators, (b) infrastructure operator and (c) infrastructure maintainers. After Southall and Ladbroke Grove, most of the expressed concern was about possible dangers arising from the separation of (a) and (b). Since the PPP would leave both in the hands of LUL, parallels with the Underground were false. Hatfield may have revealed problems between (b) and (c), which has much more potential relevance. But the inquiries about Hatfield are still proceeding, and the facts are not fully known. Until they are, judgement is premature, and the final sentence of this paragraph is simply opinion unsustained by evidence. But (as recent events on the National Rail network have demonstrated) it can present additional challenges. The Government has made it clear throughout that no structure will be brought into effect that is not covered by a Safety Case which has the full approval of the HSE.
4C57	These are moving annual averages, and the drop in the fatality rate in 1999 was not significant – it simply meant that a fatality 12 months earlier had moved out of the data set. The more recent increase simply means another fatality has happened – but we are still dealing in ones. The major injury rate doubled between 1995 and 1998, since when it has had a generally falling trend. The minor injury trend (not mentioned here) has been generally upward, possibly because of the displacement onto public transport (as a conscious act of public policy) of those who might previously have drunk and driven, but there are breaks in the time series due to re-definitions of severity arising from changes in Regulations.

4C58	This is broadly correct, but if (as is argued) much of the problem is off-system, it is not clear what (apart from providing taxis) LUL can do about it. Lack of security in the street after dark (real or perceived) is an issue for all street users, not merely those accessing Underground stations, and needs to be addressed as such. Even TfL does not control most of London's streets (how far do "surrounding areas" extend?). To make significant progress in this area, the police and boroughs must also be on board.
Proposal 4C.12	A costed programme? A timescale for producing it? Targets?
4C.59	1. This paragraph is confusing. It refers to peak figures, annual totals and a 'passenger demand forecast' which does not specify whether it is peak or total. Presumably the Mayor is worried (rightly) about peak capacity, which is a far bigger problem than off-peak capacity, but it is not clear. 2. 'Amongst the proposed new lines…' Are there others? Surely London should have been consulted on them? 3. The Strategy would have more force if it explained what effect these new lines would have on congestion (perhaps with diagrams similar to Figures 4C.2/3), and showed that these new lines will offer good value for money.

Chapter 4D: Docklands Light Rail and Croydon Tramlink

Paragraph	*Comment*
4D.2 and Figure 4D.1	Indeed. But there is no serious analysis of the demands that the DLR will have to meet. Annual ridership figures are meaningless – where, at what times of the day/week, and from what year, are there likely to be capacity problems? There needs to be a policy here – there is currently no suggestion in this paragraph that the signalling modifications or the extra trains will actually happen.
4D.5	This suggests that Smartcards will definitely be valid on DLR. This is less ambiguous than 4B.15 and 4B.22. The Committee supports this more definite approach.
Proposal 4D.1	1. Timescale? Budget? 2. How far is 'surrounding'? Is this just a 'safe key routes to stations' proposal, or is planned to ensure that the entire street environment within the DLR catchment area is accessible (i.e. so that everyone will be able to get to their DLR station). The latter is obviously better.
4D.7	1. Is the Tower Hill proposal intended as an alternative to having a Tower Hill station in the tunnel to Bank, for which passive provision was made, and which is not mentioned in the Strategy? 2. The Strategy does not mention that the powers that are being sought for the Airport extension also involve going beyond the airport, to a station on the south side of the King George V Dock. This section would be built if additional money were made available. Does the Mayor intend to contribute, or to seek external funding, or both? Where does it lie in the list of priorities?
Proposal 4D.3	A costed programme? Timetable for implementation?

Proposal 4D.4	1. Timescale for producing a plan? Timescale for implementation? Budget? 2. How far is 'surrounding'? Is this just a 'safe key routes to tram stops' proposal, or is planned to ensure that the entire street environment within the Tramlink catchment area is accessible (i.e. so that everyone will be able to get to their tram stop)? The latter is obviously better.
4D.13	1. The potential extensions to Tramlink need to be considered in the context of how to make best use of the existing heavy rail corridors in the area, and how to best support the existing longer-distance bus services. There may be benefits in conversion of some National Rail branches to Tramlink (although the Committee, mindful of its potential role in closure proceedings, has no views on particular options). Conversely, the scope for improved heavy rail services on appropriate lines should also be considered. 2. There are particular traffic objectives in the smaller town centres of Merton which are currently patchily served by rail or tram. 3. The scope for extensions on other corridors that are presently not rail-served, such as Croydon to West Wickham, should also be assessed. 4. The potential role of an extension towards Purley is unclear, given the high level of service on the parallel rail line.

Chapter 4E: National Rail

Paragraph	*Comment*
4E3	1. What precisely are the "deep rooted failings tragically exposed" by the events cited? In 2 of the 3 cases, the inquiry reports are not yet completed, so this judgement may be premature. And even if this description is sustained, it is far from clear that the remedies will be within the Mayor's power to influence in any way. 2. The theme of poor punctuality and reliability is a good one, but the text displays an incomplete explanation (or understanding) of the statistics. It is not stated why the 'published service quality figures' (presumably the Charter figures) 'understate actual performance failings' (does this refer to void days?), nor is it explained why inner London passengers are particularly affected by this. It is not explained that the figures refer only to peak-time with-flow trains (if indeed they are Charter figures). Thus the 11% figure is presumably actually a peak figure. For a more useful picture of current performance, the recently-introduced Public Performance Measure (PPM) statistics can be used. For the London commuter TOCs, they show peak performance and all-trains performance, with no omissions.
Figures 4E.1 to 4E.3	These need the word 'Figure' in their titles.
Figures 4E.1 & 4E.2	These diagrams are poorly presented. What PIXC means in practice is not defined here, so the lay reader has no way of relating the colours to anything meaningful. The violet lines are omitted from the legend. It is not explained why some links have multiple colours. The links heading south-east from Waterloo, that do not obviously correspond with any real route, are presumably Eurostars, but it is not clear why the line takes a different direction in each diagram.

Figure 4E.2	This diagram does not take account of the Thameslink 2000 project (the existence of the Moorgate branch is the give-away). The project is likely to go ahead (it only requires powers), so its effects should be included on this diagram. (By comparison, Phase 2 of the Channel Tunnel Rail Link *is* included).
Figure 4E.3	If these are indeed Passengers' Charter figures, then the legend is wrong – they are peak-time with-flow trains with void days excluded. Presumably the graph refers to the ex-Network SouthEast commuter operators, in which case the title is not quite right (some ex-InterCity operators serve South-East commuter markets too).
4E4	This entire paragraph needs to be re-assessed – as it stands, it greatly weakens the Strategy's credibility. Considering the kind of media coverage Ladbroke Grove received, it's surprising that the figure was as low as 65%. But that doesn't make it true. Indeed, the statistics show that it isn't. The third sentence is misleading. The Regulator was indeed concerned about broken rails, but because of their effect on performance, not their effect on safety. What does the last sentence imply? There is no difference in signalling systems or rail quality between London and other parts of the network. But there are more trains and more intensive asset utilisation – so on the law of averages, London might reasonably expect to be the scene of a higher proportion of such events. There is no serious suggestion that there should be fewer trains in London, so that fewer of them will be there to be potential accident casualties. This sentence is therefore irrelevant.
4E5	This is also very muddled. There is a 3-way split of function between (a) train operators, (b) infrastructure operator and (c) infrastructure maintainers. After Southall and Ladbroke Grove, most of the expressed concern was about possible dangers arising from the separation of (a) and (b). Hatfield may have revealed problems between (b) and (c) (*not* as the Strategy seems to be suggesting here), which has much more potential relevance. But the inquiries about Hatfield are still proceeding, and the facts are not fully known. Until they are, judgement is premature. Experience in other industries has shown that it is too simplistic to argue that vertical disintegration of functions will *necessarily* imperil safety.
Proposal 4E.1	Although some of the objectives that the Mayor will seek from the franchise replacement process may be inferred from this chapter, it is unfortunate that the Proposal limits itself to conveying this rather basic information, and gives no indication of *what* balance will be sought. (see also comment on Policy 4E.2). It would have been far more helpful if the draft guidance and instructions had been included in the consultation. See Part A for the Committee's views on what should be in the guidance and instructions.
Policy 4E2	Who could disagree? The real issue is the relative priority to be given to safety, capacity and reliability if (and it's a big if) the three are in tension, at least in the short term. Hard choices about resource allocation have to be made. Is the Mayor willing to share responsibility for making them, or would he prefer to preach from the touchline? Para. 4E.14 recognises the problem (except in relation to safety) but offers no clear-cut priorities. (See also comment on Policy 4E.1.)
Proposal 4E.2	The Mayor will no doubt also consult LTUC (as the statutory body), user groups, etc.

4E.11 and 4E.12, Proposal 4E.3	1. Also franchise *extension*, which is a shorter-lasting version of franchise replacement. 2. The proposal is right to highlight the need for the refranchising process to meet the Strategy's objectives. The Mayor particularly needs to ensure that the process comprehensively addresses London's known transport needs, rather than simply procuring the SRA's choice of schemes from among those that the bidders themselves decided to propose.
4E.12	It is somewhat harsh to say that there is little evidence of a greater degree of customer focus. The evidence is mixed. Indeed, different TOCs show good customer focus in different facets of their business. The key is to get the *consistent* customer focus and the network-wide consistency that the Mayor rightly requires in the rest of this paragraph. See Part A for a discussion on how this can be achieved.
4E.13	The aspirations are right, but this paragraph is bland, self-evident and not very helpful. What does the Mayor consider to be the right number of cancellations and delays – in other words, what level does he consider acceptable in a World City? The SRA is procuring 93.75% punctuality (reaching this figure over time) across the board as part of the refranchising process. This leaves one train in 16 to be late. (Punctuality here is defined as a train being less than 5 minutes late at its final destination, and thus some journeys which passengers would regard as late will be officially 'on time'.) It is not made clear whether or not this is sufficient to meet the Mayor's aspirations, and, if not, how the Strategy intends to improve matters still further.
Proposal 4E.4	It is not clear how the Mayor or TfL can improve the reliability of the National Rail network in London, given that their operational interface with it is limited to joint operation of a handful of stations and stretches of track, unless they plan to *procure* improved reliability.
4E16 and Proposal 4E5	This paragraph and Proposal are not very helpful. The law requires operators to do what is "reasonably practicable", not to provide the "best possible" (i.e. without any regard for the balance of benefits and costs). Taken literally, this proposal could result in a seriously sub-optimal use of resources. Cullen/Uff are wrestling with the issue, and it would have been better merely to say so and await the outcome.
4E.17	1. Again, as with the discussion of new Underground lines, the Strategy fails to show what level of congestion relief will be provided by the major projects. Which problems will they solve? Which ones will remain? 2. See Part A for a discussion of smaller-scale opportunities.
4E.19	'at most times of day' is strange – does this mean office hours, shopping hours, or something else? It should really be at the times of day when people want to travel – i.e. around the clock, as far as is consistent with practicality and value-for-money.
4E.21	The last sentence is superfluous. *All* the replacement franchises need to reflect the Metro concept.
4E.24	The last sentence appears to be a refugee from elsewhere in this chapter – it does not sit with a discussion of OrbiRail. Furthermore, there is no clue as to the particular significance of the Chingford / Enfield / Lee Valley lines.
Proposals 4E.6 to 4E.9	Timescales for actual implementation? Costs? Funding? Relationship with existing standards (such as Railtrack's 'Developing Modern Facilities at Stations')?

4E.26	1. See Part A for a discussion of how this should be done. 2. Also the provision of cycle space on trains. 3. Operators need to have proper revenue protection arrangements in place. This makes several contributions to the Mayor's objectives – it provides a reassuring staff presence, it provides assistance for passengers, it regains control of the railway from vandals and other criminals (because they will only travel for free), and it helps the operators to get the revenue they need. 4. Also high standards for replacement bus services during engineering work. These services are often poor, and sometimes shambolic, because of poor planning, lack of information to passengers, and even drivers not knowing where to go! 5. Also, stations too often only have information relating to routes directly served from that station, or by the station operator (for example, about disruption due to engineering work). There is too little recognition of the importance of other routes on the network which are reached by interchange. This needs to be addressed.
4E.26, 4E.27 and 4E.29	Also, many stations have inconvenient access routes. There may be locations where a resited 'way in' will provide a shorter, more integrated or more attractive walk to the station.
4E.27	1. This is quite right to identify the importance of measures both in and around stations. Partnerships between operators and local authorities have been helpful in tackling the problem holistically, and should be encouraged. 2. Without specifying the measures in question, the second sentence is unhelpful.
4E28	What are accredited are secure stations, not safe ones. And the fourth sentence is factually wrong (see DETR News Release 1081 of 11/11/99): the first stations in London to be accredited were suburban stations on Connex South Eastern. The last sentence is very woolly. Secure Station status should be the standard to aspire to, not a bonus for a select few stations.
4E.29	This paragraph duplicates 4E.26 to 4E.27
Proposal 4E.10	How does this fit in with Railtrack's national aspiration for all stations to be accessible within ten years? Is the Mayor planning to fund the parts that won't be funded by the SRA? Paragraph 4E.20 (fifth bullet point) suggests that accessibility is part of the London Metro specification. That is rather more appropriate than the woolliness of this Proposal. Even allowing for the difficulties that some of the stations present, in a World City the entire London Metro network ought to be fully accessible within (say) ten years.
4E.31 and Policy 4E.3	This proposal is looking at the issue the wrong way. It implicitly suggests that the only two travel options are car & rail or car all the way. It also postulates the creation of additional parking space, which is a waste of the scarce land resource. So the review should look at the opportunities for modal shift to public transport for the whole journey. Factors such as connecting buses/taxis, and safe walking routes to the station, should be included, in line with the Mayor's other policies. The encouragement of railheading by car should be the 'modal shift of last resort'.

Paragraph	*Comment*
4F.3	In the interests of balanced reporting, the Strategy should mention that most of the customer satisfaction scores in Figure 4F.3 improved (the rest stayed still). Why was that, and what can be learnt from it?
Proposal 4F.3	It's not clear how TfL proposes to influence pay.
4F.16 and Proposal 4F.4	1. See Part A for a discussion on the utility of conductors. 2. It is unclear why the focus is specifically on central London? If conductors are to be re-introduced, there are busy radial, suburban and orbital routes which could be equally deserving candidates. A coherent appraisal will need to be made, to ensure that the best choice of routes to be conductorised is made.
4F.17	Are the 'clearly defined improvements' actually the loosely-defined 'targets' printed below (such as '10-20% reduction in… journey times')? If not, they should be described.
4F.20 to 4F.21 & Proposal 4F.5	1. 'ultimately… the majority of important bus corridors' in 4F.20 conflicts with Proposal 4F.5 which says 'all major bus corridors'. 2. The target milestones are very weak. Is it really not possible to cover all the major bus corridors until 2011? Ten years is rather long-term for something that is supposed to be a short-term priority (CrossRail is supposed to be open before this programme is finished.)
4F.24	1. Express bus services need to be planned with care if they are to work, as shortcomings in earlier attempts have shown. They need routes on which they can achieve express speeds (not being held up by all-stops buses), plus local services to feed them seamlessly. 2. The strategy rightly recognises the need for new Sunday services, but does not explain why. It is the smaller bus routes, serving residential areas, which often have no Sunday or Bank Holiday service (or a very limited one) – a limiting factor for people who are reliant on those buses (see also the discussion of the 7-day city). 2. There is a particular need for more local feeder buses to town centres, hospitals and schools (following on from the successful developments of recent years). These services will particularly address social exclusion issues, thus supporting objective T6.
Proposal 4F.6	Timescale? Targets? '… but requires staffing shortages to be resolved' rather underplays the seriousness and deep-seated nature of the problem!
Proposal 4F.7	This also requires staffing shortages to be resolved.
4F.26	'giving priority to buses…' does not address the problems of streetworks or accidents that are correctly identified in the previous sentence.

4F.27	Consultation with bus users (including consultation through their statutory representative, LTUC) is also vital. Too often, consultation has meant consulting only affected frontagers – which means that often only one side of the coin is seen, namely that of individual traders who fear (usually wrongly) a loss of passing trade when parking is restricted on bus stops outside their frontages. The view of the large numbers of people who stand to benefit directly from these measures is rarely sought or heard.
4F.28	There needs to be a proposal for improved passenger facilities at stops – the following proposals only cover the road layout and Countdown.
Proposal 4F.8	This needs to be firmer – as per Proposal 4G.3, boroughs should be *required* to make all bus stops meet the relevant standard (LBPN guidelines or a successor). Some boroughs have an uncanny knack of compromising on the standards for not necessarily good reasons. Timescale for implementation?
4F.30	1. For understandable reasons, low-frequency routes, and their stops on the back streets, will generally be the last to receive Countdown. Yet it is these routes where real-time information is of most use, because (for example) a cancellation may mean a 30-minute delay rather than a ten-minute delay. What is to be done about these? 2. The eventual aim should be to have real-time information (whether or not Countdown is the precise system used) at every stop. Many putative bus passengers will need to start their journeys from relatively minor stops; they still deserve a consistently high quality service (as the Mayor rightly asks for in general). How about that as part of the vision for 2011? 3. 'There may also be scope' is far too weak. There is *definitely* scope to include signs away from bus stops and on the internet etc. This is very important in attracting new users to buses, by effectively eliminating the random and wasted waiting time at the stop (one of the factors that currently encourage car use).
4F.32	See Part A for comments on Routemasters.
4F.33	Also consideration of the relative benefits of single-decker and double-decker buses – e.g. capacity, levels of vandalism, passenger preferences, safety record.
Proposal 4F.10	If the cost is largely within existing projections, how can it be an accelerated programme?
4F.34 and Proposal 4F.12	This is bland, unhelpful and very weak. See Part A for comments on bus safety and security.
4F.37	The first part overlaps with 4F.28. See comments on 4F.30 about Countdown.
4F.38	Some services operating under London Local Service Permits are part of London's public transport system, and should be publicised as such – e.g. National Express (some journeys can be made within London) and Airbus.

Chapter 4G: Streets for All

Paragraph	*Comment*
4G.16 to 4G.18	See Part A for a discussion of parking policy
4G.17	It should be made explicit that town centre pedestrianisation schemes should not exclude buses from the main streets – to aid accessibility, and to further encourage bus use over car use.
4G.22	This is very weak – and the proposals that follow are far stronger. The proposals are the more effective.
Proposals 4G.2 and 4G.3	These two proposals overlap substantially. Apart from references to LBI, it's not clear what the distinction is. A fully accessible network requires adequate bus stop geometry, not just the one-bus-length box of yore that is still common today. The stops should be required to meet LBPN standards (or a successor standard). It would have been be helpful to know what standard of enforcement the Mayor considers to be 'effective'. The requirement for all stops to have 24-hour clearways is very welcome – as long as it really is a requirement. Traffic authorities should not be allowed to get away with less effective measures, under the undue influence of vocal parochial arguments.
4G.18	It will not always (maybe not often) be possible to satisfy all the competing interests. Who will decide what should get priority?
4G.19 to 4G.20	But this glosses over the (related) facts that (a) bus priorities have mainly been holding bus speeds and reliability steady in the face of deterioration all around, and (b) lack of enforcement has limited their effectiveness. The Strategy needs to address these problems specifically.
4G.22	Why the qualified reference to 'more effective bus stop clearways'? Surely all bus stops will have fully effective clearways anyway, according to Proposal 4F.8 and Proposal 4G.3.
Proposal 4G.2	The rationale behind '…areas such as the West End' needs to be explained. Does it refer to areas that have so many bus routes that area-based intensive bus priority measures will have widespread benefits? If so, the Committee is in favour.
Proposals 4G.2 and 4G.3	Targets? Standards? Resources to be allocated to Boroughs for this?
Proposal 4G.3	In line with Proposal 4F.8, it should be made explicit that the clearways will be to LBPN (or successor) standards. Otherwise, Boroughs may introduce clearways that replicate existing markings that were from outdated standards (a practice that Boroughs are indeed sometimes carrying out at the moment).
4G.24	This is right, but it should be made clear that buses should not be excluded from town centres by pedestrianisation schemes. The two can co-exist happily, but forcing bus passengers out to the edge of a town centre (e.g. Romford) will not encourage public transport use.

Proposal 4G.4	What does 'unduly' mean? How much priority is to be given to each user? Again, someone will, in practice, have to choose priorities. How? What is to be the rate of reviews on the Borough roads? And how many years will the programme take? Given the number of junctions, probably far too many for what should really be a short-term priority.
4G.24	1. Walking must be acknowledged as a part of every public transport trip. 2. Safe crossings can include entry treatments.
4G.24 to 4G.27	See Part A for a discussion of road safety. If walking, cycling and motorcycling are all much more dangerous than cars, the theoretically logical policy might be to ban them and make cars compulsory. Alternatively, since it is contact with cars which causes most of the accidents, the cars should (theoretically) be banned. As this option is not realistic, the next best strategy is to minimise opportunities for such contact to occur – and especially for it to occur at speed, which tends to worsen the consequences. Presumably this sort of reductive analysis lies behind the policies here, but it would be helpful to see it set out, so that it is clear that the policy conclusions are justified.
4G.25	See Part A for a discussion of the importance of accessible streets. This also contributes more generally to the attractiveness of walking.
Proposal 4G.6	Naturally they should also work with users! And will the traffic engineers cycle across the junctions in all directions, so that they know what they are trying to design out?
4G.27	Motorcycles (even low-powered ones) are also particularly threatening to pedestrians (especially when they speed off at junctions or weave through traffic).
4G.28	'In central London, as in the rest of London…' is cumbersome. (Would it be reading too much into it to suggest that central London is the prime focus of concern? Is that a desirable focus?) Given that motorcycles share most of the disadvantages of cars, and that they have few advantages over bicycles, is it really appropriate for other transport users to subsidise motorcycle parking?
4G.31	The reality matches the perception.
4G.34	Many motoring offenders are also involved in other criminal activity, so effective enforcement can contribute to wider crime prevention and detection aims.
4G.36, Proposal 4G.11, 4G.38 and Proposal 4G.13	This is supported *if* TfL is prepared to put the resources in properly.
Proposal 4G.11	TfL needs to keep the level of penalties under review, to make sure that they remain a deterrent.
4G.37	It is unclear whether this refers to roadside or on-bus cameras.
4G40 to 4G46	See part A for a discussion of road safety.
Proposal 4G.15	'The Police will be expected' – this is unclear as to whether the Police actually *intend* to work with TfL on this. If not, the Strategy should explain how the Mayor will overcome this.

4G.46	Lower speed limits are also appropriate in shopping areas.
4G.49	CCTV is welcome to some extent, but research has consistently shown that the presence of staff reassures people far more. There may be a case for a staff presence at key bus interchanges (the staff would naturally also provide information and assistance).
4G.50	'…take this into account…' is rather woolly.
Proposal 4G.17	Targets? Has a cost-benefit analysis been done on this? The socio-economic cost of crime (and of the fear of crime) is surely very high; perhaps a lot more than £10 million)which is just £1 million a year) could be justified.
4G.56	These should be developed into formal traffic reduction targets.
4G.57 and Proposal 4G.18	This is very welcome in principle, although it's not clear what the further measures will be. Nor is it clear whether, in areas with conflicts such as town centres, the freed-up roadspace is to be used for further decongestion (and, if so, how it will be prevented from filling up again) or reallocated to assist the sustainable modes.
4G.59 to 4G.69	See Part A for a discussion of the relationship between decongestion and reallocation.
4G.70	The final sentence is fine – and no doubt helpful in encouraging public acceptance of the scheme. With introduction in early 2003 (at best), and the Mayoral term ending in early 2004, the first term of office is really only a teething period anyway.
4G.73	The dashes are erroneous.
Proposal 4G.20	1. What is the definition of fairly and effectively? Is this a reference to people having been illegally ticketed in the past (which is clearly wrong), or is it about allowing/forbidding people to 'just pop in for five minutes' on a yellow line? Being fair and effective for everyone means that the system should be unambiguous: selfish individuals should not be allowed to block busloads of others 'just for five minutes'. 2. The final sentence is unhelpful. The Strategy has enough different objectives to provide an excuse for any parking charges the Borough wants to implement. And parking charges *inevitably* apply Borough policies to individual locations! The Strategy needs to spell out what is needed (as he does in Policy 3.5, which seems to have been forgotten by Chapter 4G).
Proposal 4G.21	A very welcome policy – too often controls are piecemeal and outdated. The Red Route approach shows that coherent controls work. The need for explicit standards of enforcement is also right. (But does it really need until 2008 to achieve?)
4G.75 and Proposal 4G.22	The use of CPZs to restrain traffic (4G.75) is supported, but this does not come through clearly enough in the Proposal.
Proposals 4G.23, 4G.24 and 4G.25, paragraph 4G.80	This is not specific enough. . The Strategy has enough different objectives to provide an excuse for any policy the Borough wants to implement. The Strategy needs to spell out what is needed. The aim should be to reduce the numbers of parking spaces provided.

4G.79	1. A proposal is needed here to back the text up. 2. Chapter 3 *does not* deal with parking standards in more detail. But it does clarify the Mayor's policy on *some* types of parking provision.
Proposal 4G.25	One hopes the Boroughs will be sensible and incorporate the LIP, the Parking Plan and the Enforcement Plan in the same document. Otherwise, all concerned will groan under the weight of the duplicated background chapters!
4G.82 and Proposal 4G.26	1. These overlap with 4G.74 and proposal 4G.21. 2. The 2004 date conflicts with the 2001 date given in proposals 4G.21. Does the Mayor actually intend that parking and loading controls will be introduced by 2001 but any physical works might take until 2004? 3. The Committee is unconvinced that it has to take until 2008 to get decent parking and loading restrictions on all A roads and bus routes, especially as speeding-up buses is listed as a short-term priority. 4. By 'should be applied', does the Strategy mean 'will' be applied', or is it just an aspiration? This is unclear. 5. Explanation of the choice of roads in the Proposal is needed. Why only 'the majority' of other A roads; why select other roads as well? What are the criteria?
4G.83	What are the 'environmental' benefits of new capacity?
4G.85	1. The heading 'Regeneration and economic development' is misleading. 2. It is not axiomatic that road capacity assists regeneration. There is a debate over this – with just as much evidence to suggest that new capacity draws business away from the area in question.
Proposal 4G.28	See Part A for a discussion of road schemes. It is perverse that a scheme with *net* benefits fail merely because it has a substantial disbenefit in one particular area. There should also be a further criterion: maximise synergy with wider public transport improvements. (This is particularly pertinent for the A13, where an intermediate mode scheme is proposed in the area.)
4G.91	To include pedestrian and cyclist signing, and signing to/from stations, tram stops, key bus stops etc., which will assist other parts of the strategy.
Proposal 4G.30	This does not address the problem of streetworks on borough roads, many of which (e.g. in town centres) are important roads. And it's undesirable for streetworks on GLA roads to be un-co-ordinated with those on the adjoining Borough roads. Co-operation, and guidance to Boroughs, are needed.
4G.104	1. It needs to be made explicit that the aim of encouraging public transport travel to town centres is not served by excluding buses from them under pedestrianisation schemes. 2. Reducing *all* traffic, not just through traffic, should be the aim – see Part A.

Chapter 4H: The Car User

Paragraph	*Comment*
4H.5	The penultimate bullet point ('… essential car trips…') is worrying. Chapter 4G makes no reference to this concept, other than loading facilities and the congestion charging proposals. Does the Mayor intend to prioritise car driving for certain groups (e.g. low-paid NHS staff)? If so, can this be done equitably? In any case, car trips should only be considered essential if it can first be demonstrated that public transport is not adequate for them and cannot be made adequate. Whatever the answer, 'essential' need to be defined – so as to avoid confusion and contradictory policies in different areas.
4H.7 and Proposal H.1	Unpredictability of road conditions and of parking space currently discourage some car travel. Improved information on these should not attract people away from other modes. So this information improvement should only take place once public transport information is up to the required standard – and even then, given that car transport is socially exclusive compared to public transport, it should be a lower priority than the public transport improvements themselves.
4H.9, Proposal 4H.2 and Proposal 4H.3	In the integrated transport system that the Mayor rightly aspires to, the websites should also carry public transport information (by feeds from the relevant information systems, or whatever). The effect should be equivalent to a London public transport information system. In fact, given that car transport is socially exclusive compared to public transport, the public transport information should be the higher priority.
4H.10 and Proposal 4H.4	This proposal is looking at the problem the wrong way. It implicitly suggests that the only two travel options are car & rail or car all the way. It also postulates the creation of additional parking space, which is a waste of the scarce land resource. So the review should look at the opportunities for modal shift to public transport for the whole journey. Factors such as connecting buses/taxis, and safe walking routes to the station, should be included, in line with the Mayor's other policies. The encouragement of railheading by car should be the 'modal shift of last resort'.

Chapter 4I: Promoting Walking

Paragraph	*Comment*
Policy 4I.1	Even if 'walking friendly' is measurable, 'one of the most' is not particularly helpful as a target.
4I.7	This is the only suggestion so far that roadspace will be reallocated. See Part A for a discussion of this.
Proposal 4I.3	Why these particular routes? Few will want to walk all the way from Coulsdon to Barnet or from Southall to Upminster. More useful as a first stage will be concentrating on a key *area*, so as to gain network benefits. Timescale? Costs?
4I.8	Green chains etc. tend to divide local opinion between walkers (in favour) and adjoining residents (against), and thus get bogged down in local opposition. If the Mayor is serious about such routes, the Strategy should steer (or direct) the boroughs towards the former point of view.

Proposal 4I.4	What level of funding will TfL then give to it? What is the timescale for bringing streets up to this standard?
Proposal 4I.5	Even small traffic management proposals can have good or bad effects on pedestrians – all proposals should be audited for their effects on pedestrians (it need only be a very simple audit for the smaller schemes).

Chapter 4J: Promoting Cycling

Paragraph	*Comment*
4J.1	The choice here of Munich, Copenhagen and Amsterdam (less so Berlin) as comparator cities is in contrast to the Strategy's usual choice of benchmark cities namely New York, Tokyo and Paris. However, in this case it is probably a better choice – the Mayor is right to have high aspirations.
4J.3	The Strategy needs to acknowledge what is possibly the most important discouragement to bicycle use: the creature comforts of cars.
4J.4	The BMA actually said that it was difficult to calculate the net health effect of cycling, but that it was *probably* beneficial. The health disbenefits due to deaths and injuries are rather glossed over here.
Proposal 4J.2	What is 'an extended core high quality cycle network'? An objective is needed – say, every house, office etc. to be within 5 minutes ride of the ECHQCN.
Proposal 4J.3	Even small traffic management proposals can have good or bad effects on cyclists – they should have a cycle audit too (it need only be a very simple audit for the smaller schemes).
Proposal 4J.6	This is right and laudable, but the Strategy should acknowledge that there are limits to what can realistically be achieved.

Chapter 4K: Freight, Delivery and Servicing

Paragraph	*Comment*
Policy 4K1	Another bullet point is needed – to minimise the impact on other road users. Otherwise this policy is unbalanced.
4K.6	There is a danger of each issue being considered in isolation. What is needed is a pan-modal look at distribution, aimed at generating a distribution strategy for London.
4K.10	This seriously underplays two problems: (a) restrictions being *deliberately* flouted; and (b) the under-use of existing off-street servicing.
Proposal 4K.3	1. This seriously underplays the importance of enforcement. The controls are ineffective if white van drivers ignores them, as is the case now. 2. Another bullet point is needed to: enhance the use of existing off-street loading provision, and to provide new off-street loading provision.

Proposals 4K.3 and 4K.4	There are many issues related to vehicle size. A move to smaller vehicles may reduce pressure on kerbspace, and may encourage the use of older rear servicing areas that cannot accommodate larger vehicles. It would also improve road safety for cyclists. But it might also increase the total number of goods vehicles on the road. The distribution strategy (proposed in Part A) needs to consider these fully.
4K.12	The scope for expanding delivery services from large shops, supermarkets etc. (possibly combining deliveries from several stores), along with internet ordering, should be explored as ways in which distribution (at suitable times of the day and week) can help to reduce unnecessary car journeys.
Proposal 4K.4	1. The question of delivery hours is vital. Although some freight is time critical, much is not, and can reasonably be expected to have to avoid peak times. 2. Also the role of back-room stock storage in allowing delivery patterns to reflect transport needs without jeopardising re-supply needs. 3. The Mayor should also consider what powers exist to support these opportunities directly, through the planning system (e.g. conditions attached to new developments) or through the traffic management system (e.g. regulating the sizes of vehicles or delivery hours in particular streets / areas).
4K.13	It is unclear why public money should be spent on solving a problem that certain operators and premises cause for themselves, unless it is genuinely spent on projects that could not otherwise take place.
Proposal 4K.6	Enforcement is also needed.
4K.19	This duplicates the second sentence of 4K.18

Chapter 4L: London's International Links

Paragraph	*Comment*
Policy 4L.1	1. Facilities for access to airports can also help the wider travelling public – e.g. if the airports become interchange hubs, or when local services (e.g. for airport workers) can help with other local journeys. 2. There are currently practical limitations to the amount of freight that can be taken to airports by rail, because the rail corridors are often running at full capacity. In the longer term, capacity increases would help (and could also help to meet aspirations for new passenger services), but in the shorter term passenger services should get priority. (The role of airport freight should also be considered in the London distribution strategy that is proposed in Part A.)
4L.2	The first and last sentences repeat each other.
4L.3	This policy is fine, but no justification is given. From the Committee's point of view, the justification is that a choice of airports will reduce the distance people have to travel to get to/from an airport, and indeed will allow the quality of the surface access to be a factor when people choose which airport to use.
4L.4	The Strategy should promote the possibilities for linking Heathrow into international rail services. This is to encourage public transport access, to allow for potential restrictions on short-haul flights, and to provide new journey opportunities for other rail passengers.
Policy 4L.5	Airtrack should not involve premium fares.

4L.9	1. Integration includes making the most of the transport facilities at airports as interchanges for non-airport-related travel. 2. The Strategy should promote the possibilities for linking Heathrow into the inter-city and international rail networks. This is to encourage public transport access, to allow for potential restrictions on short-haul flights, and to provide new journey opportunities for rail passengers.. 3. The Strategy rightly recognises the importance of good local links. Airtrack must provide these from south-west and south London, as a higher priority than longer-distance services. 4. Premium fares particularly inhibit workers' travel, and should be discouraged. 5. Heathrow Express ought to become more integrated with the National Rail network – accepting Travelcards and Railcards, and ideally without the premium fare. 6. The needs of Londoners travelling to Stansted, Gatwick and London City airports are under-examined – too much emphasis is placed on Heathrow. Luton is assumed not to exist! Consideration of Biggin Hill's expansion plans is also needed. 7. The Strategy should particularly address the need to improve night-time access to Heathrow, local rail access to Gatwick from outer south London, and the need for Stratford-Stansted services (to serve the airport's east London recruitment base and to link with onward services from Stratford). 8. Just as important as infrastructure and services, however, is information. TfL should work with the aviation industry to improve the availability and timeliness of multi-modal information (and ticketing facilities) for air passengers.

Chapter 4M: River Thames and Other Waterways

Paragraph	*Comment*
4M.1	The reference to the use of towpaths as walking/cycling routes is the only reference to the topic. There needs to be a Policy about it.
4M.2	The third sentence is unhelpful. Any transport system has safety risks. The Strategy should be explaining the *particular* safety risks on the Thames.
4M.3	1. There are some riparian locations which are poorly served by public transport, for which river services could provide a particularly useful means of transport (as is shown by the current commuter service to the northern part of the Surrey Docks area). 2. There is no reference to the Woolwich Ferry, whose role is quite different from that of the riverbus services.
Policy 4M.1	The second sentence suggests the river should merely be a sightseeing route, rather than a real (although niche) part of the transport system. The latter is what the Strategy seems to want, and what the Committee supports.

Proposal 4M.2	This proposal is welcome. Other related issues are: 1. There are gaps in the provision of piers. A strategic study of options for new piers is needed, in order to optimise the services offered. 2. There are constraints on the siting of piers which mean that only certain locations are suitable. Some of these are 'sterilised' by under-used privately-owned piers, resulting in sub-optimal locations of river service piers. 3. The planning system for riparian sites should consider the possibilities for new piers and improved interchange with other transport facilities, so as to assist with this Proposal and Proposal 4M.3.
4M.4	The aim should be for river services to come under Travelcard. The proposed discount for Travelcards holders is a welcome step.

Chapter 4N: Taxis and Minicabs, Community Transport and Door-to-Door Transport

Paragraph	*Comment*
4N.2	1. Presumably "safer" here means "more secure", but it is an example of the confusing use of terminology in the Strategy. 2. Will congestion charging mean more demand for taxis in central London? If so, will there be an adverse effect on taxi availability elsewhere?
4N.5	There is also a need to ensure that standards of driving and compliance with traffic law are high.
4N.7	This paragraph omits the key benefit of Home-link and similar schemes: they eliminate the walk to/from the station, which is a source of perceived personal insecurity, thus encouraging public transport use (see 4P.25). They assist Proposals 4C.12, 4E.10 and 4P.3. Simply encouraging these schemes is weak. The Mayor needs to have a policy (and issue guidance to the SRA) on the importance of the Underground and National Rail systems providing a door-to-door service for people who want one.
Policy 4N.1	There is no consideration of taxi fares in this chapter. The Strategy also needs to address the specific problem of cross-boundary fares – this is particularly evident at Heathrow, where short journeys across the Greater London boundary to Spelthorne are seen as very expensive.
Proposal 4N.9	This is welcome. TfL should also take account of the results of the Transport Committee for London's consideration of these services.

Chapter 4O: Accessible Transport

Paragraph	*Comment*
4O.1	'A range of services, facilities and jobs' implies that being able to get to a couple of shopping centres, a few employment centres, etc. is enough. This is either badly worded, or an outdated attitude which denies disabled people (or other people with impaired mobility) the same level of choice as other people have. In a World City, the aim should be for a fully accessible system (even if the most difficult cases, such as some Underground stations, will not be tackled in the near future).
Proposal 4O.1	The aim is right, but the Proposal is unclear – does 'control' mean 'provided', or 'provided and procured', or 'provided and procured and licensed', or 'provided and procured and licensed and given guidance'? The phrase 'provide and plan' also needs to be made clearer (it might be read as excluding those who 'operate' transport, e.g. drivers).When will all staff have gone through the process? Will there be refresher training?
4O.10	This is a very welcome commitment. One major point arising from recent experience is that to rely on one lift for access to a particular facility will result in problems when, from time to time, that facility is out of order (e.g. the one lift to the DLR at Bank – cf. the welcome decision to avoid that situation at the London City Airport DLR station).
4O.11 and 4O.12	1. This section is curious. Nowhere else is such specific mention made of user needs, Certainly, accessibility issues can be less amenable to mis-judgement of the user's requirement than other issues. But this does not mean that user needs should be highlighted in relation to accessibility and sidelined in relation to everything else. See Part A for a discussion of the user voice. 2. Paragraph 4O.3 recognised, as TfL does in practice, that accessibility is not just about disabled people. But this section refers only to disabled people and older people. What about involvement of people who habitually travel with shopping / buggies / toddlers / luggage etc.? And being old does not *automatically* make someone immobile.
Proposal 4O.5	Target for full production of the information? Why does 'the full range of accessible services' not come under 'all public transport services'?
4O.17	Again, the issues are not just limited to disabled people.

Chapter 4P: Integration – The Seamless Journey

Paragraph	*Comment*
4P.3	In particular, stations (especially National Rail ones) have been poor at 'soft integration' with buses (e.g. not having bus information or not selling bus passes) – despite often being the most handy 'customer service points' for some key bus stops.
Proposal 4P.1	Presumably this policy refers to prioritising individual schemes within work programmes, since it is for the Strategy to set overall priorities.
4P.11	Does the final sentence mean consistency within the National Rail Network or consistency with TfL's services? In fact, both are needed.
Policy 4P.2	Also for cyclists to take bikes on trains.

Proposal 4P.2	1. This appears to be operating completely separately from the proposals aimed at car drivers (Proposals 4H.1 to 4H.3). A truly integrated system would link the two. 2. This appears to be an unduly long timescale simply to produce the plan.
4P.17 to 4P.19	Outer London interchanges also have an important role as feeders to/from the long-distance rail network. These save people from having to travel via central London, thus reducing congestion in central London, saving passengers time and money, and supporting sustainability. This role needs to be enhanced.
4P.21	1. Not just Londoners, but all users of London's transport – i.e. visitors and people making cross-London journeys as well. 2. Second bullet point: also enabling them to choose the *ticket* that best meets their needs.
4P.22	The 'whole journey approach' also means giving passengers real-time information at the points where they are in charge of their travel options – i.e. not just once they have gone through barriers onto platforms, but in ticket halls (or wherever), where they can decide to use a different mode or to do something useful (e.g. having a cup of tea) in the waiting time.
4P24.	Hours are not "anti-social", but "unsocial".
Proposal 4P.3	Targets? Budget?
4P27	The heading should clearly be Security, but (more importantly) this paragraph and its associated policy repeat what has been said in the previous two paragraphs.

Chapter 4Q: Major Projects

Paragraph	*Comment*
Policy 4Q.1	See Part A for a discussion of the role of major projects. The Croxley Link (see part A) and Airtrack to Heathrow also need to be in this list.
4Q.6	It is very disappointing that the results of these reviews are not shared, and so consultees cannot assess the costs and benefits of these schemes.
4Q.8 and Proposal 4Q.1	Agreed. TfL should also address the deficiencies in the proposed design for Farringdon, which is short-termist and will (as the proposers themselves admit) produce a crowded station.
4Q.22	Agreed. In particular, the current scheme works around infrastructure constraints at the south end, which prevent a Clapham Junction service and require the use of West Croydon rather than East Croydon. There may be opportunities for additional work (possibly in conjunction with Metro developments) in order to remove those constraints, thus maximising connectivity.
Proposal 4Q.5	The proposals need to be the subject of a full appraisal by a recognised method, so that consultation can take place on the basis of a coherent knowledge of the costs and benefits involved.
4Q.32	The third sentence is vague. What *is* 'an acceptable level of accessibility' for motorists? The Strategy seems to be saying that there should be a minimum level (quality? distance?) of road access between locations. Fair enough, but only after the needs of more sustainable modes have been given first priority.

Chapter 5: Making it Happen – A Programme of Action

Paragraph	*Comment*
5.5 to 5.15	The Strategy needs to set out the Mayor's policy on what he will do if particular projects overspend, and the consultation arrangements if he plans to switch funds between projects as a result.
5.13	The second sentence shows why the Mayor needs to say whether he will fund improvements to the National Rail network that the SRA will not. See also Part A.
5.15	But these 'priorities' still cover a lot of the programme. The list doesn't help very much. See also Part A.
5.20 to 5.21	See Part A for a discussion of Underground financing.
Policy 5.3	It is especially welcome that the Mayor will issue directions to Boroughs if necessary. Too often, Boroughs are put off particular transport improvements by very localised (and often misguided) opposition to measures that will benefit a wide range of people.
5.30	The railway industry as a whole has rarely seriously attempted to explain to bodies such as us or the Boroughs exactly what paths are or are not available, and what other technical constraints there are. Too often we are frustrated by unspecified difficulties. It would be in the interests of transparency and informed debate (particularly in an atmosphere of partnership) for the reality behind these issues to be made clear.
Policy 5.4	The guidance should cover services to and from London, not just within it, because these are vital to London's economy and to Londoners' travel patterns. See also Part A.
5.32	The final sentence rightly hits on a vital issue that is underplayed in the strategy (it is relegated to Annex 1, para. 5). Boroughs are too often frightened of parking restraint because they fear competition from shire districts that have more generous policies.
Proposal 5.4	This sort of analysis is what is sadly missing from the strategy, but necessary if any sense is to be made of it. See Part A.
5.37 to 5.39	1. In particular, will there be enough technical expertise to progress CrossRail and Chelsea-Hackney and yet still leave scope for smaller-scale projects? 2. What is also important is clear project management capability. This is not automatically present in an organisation that also has to deal with day-to-day operations (as recent years' travails of both the Underground and Railtrack have suggested).
5.41	Welcome. It's crucial to be able to track trends objectively.
5.42	Basically fine, except the last one. As written, this comes dangerously close to saying "if it's bad news, we don't want to hear it". The fact that an important adverse trend is outside one's power to influence it is no reason for not measuring it!
5.43	OK. But the Assembly and LTUC also have a role and interest in developing performance indicators, and it would be courteous to acknowledge them explicitly.

5.44	Basically OK. But why is progress towards meeting accident reduction targets only to be tracked on the roads? In the case of modal split and door-to-door times, should these be extended to encompass freight? And given the strategic transport focus of most of what's in this list, does "progress towards making staff more trained in equalities issues" really sit happily within it? Doesn't "customer focus" encompass this anyway?
5.45	1. Basically OK, but it's not clear how these are actually different in kind from 5.44, and that they have to be in a separate list. 2. The Committee is unconvinced that data from these 'rival' cities can *really* be comparable. 3. Indicators of frequency need to be treated carefully. It's an important attribute, but what needs to be tracked is what is *delivered*, not what is *planned*. And there may be trade-offs: is it better to have a 5-minute walk to a stop and a 10-minute wait, or a 10-minute walk and a 5-minute wait? The number of buses running would be the same, but the second scenario (by concentrating them on one route) doubles the frequency and halves the density. A better measure would be average time from house door to bus door (in which case these two scenarios would produce the same result). 4. Likewise, be careful about journey speed. Doubling the number of bus stops, or inserting intermediate calls on through trains, might be a good way of improving network accessibility, but at the cost of longer journey times (i.e. slower speeds) for existing users. The disbenefit to them needs to be set against the time savings for users of these extra stops/calls – so it's average overall journey time, door-to-door, for the complete set of passengers that matters. 5. Road traffic levels is not a measure of performance, but a measure of demand. It's irrelevant if utilisation of network capacity has risen from 5% to 15%, but critical if it's risen from 95% to 105%. The relevant performance measures (i.e. of outcomes) would be journey times and modal split, unless there's a conscious policy aim of reducing road traffic as an end in itself - in which case you need to know how much has been diverted (to other modes or routes) and how much has been suppressed. And what are the units of measurement for road traffic: vehicles or people? Suppose road journeys are 50% by car and 50% on foot: if car use rises by 10% and foot use falls by 10% (assuming constant levels of car and shoe occupancy), is that an increase in traffic or no change? 6. There are other important qualitative facets of performance in the public transport sector which it is important to track (e.g. through Customer Satisfaction Indexes and Mystery Traveller Surveys), such as cleanliness, comfort, information, safety, security and value for money. The indicators also need to distinguish between different times of day and week, because service quality varies between times. There also need to be performance indicators for walking journeys. There should also be indication of how the transport system is affecting health and social inclusion/exclusion.
5.47	The Assembly and LTUC also have a role and interest in developing performance indicators, and it would be courteous to acknowledge them explicitly.

Annex 1: Parking Standards

Paragraph	*Comment*
7	The parking standards should also be related to the *scope* for improvements to public transport. Many large developments have reasonable opportunities for increases in public transport accessibility through new services and facilities (e.g. feeder buses) provided or underwritten by the developers (e.g. through Section 106 agreements). The opportunities for this should be examined when assessing each development, and the parking levels reduced as appropriate.
11	Similar problems of environmental quality and poor utilisation of land arise from private non-residential (PNR) parking; reference should be made to this at the appropriate place.
13	It is *not* clear that 'in most situations car free housing is impractical'. In London, 36% of households have no car (source: Transport Statistics for London 2000, table 10a), many through choice. These people manage somehow. In fact, in land-use terms, given the high demand for housing and the limited land available for it, it could be argued that the car-enabled housing is what is impractical. And London probably has among the highest levels of public transport accessibility in Britain, so car-free housing is at its most practical here – especially in inner areas.
14	*Why* is it unacceptably restrictive? Furthermore, London is where the pressures on land are highest, and thus where provision for parking is most wasteful. If the Strategy is serious about sustainability and modal shift, this nettle must be grasped.
16	It must be clear that the Mayor intends to reduce PNR parking levels, in line with his objectives, as part of the Spatial Development Strategy.

Annex 2: [The proposed Underground PPP]

Paragraph	*Comment*
3	But while the upgrading work is going on, some loss of capacity/availability is inescapable. To limit it to 5% would be a major constraint anyway, and if they can do it with less, then offering some reward to encourage this might be well worth it.

See also Part A for a discussion of the Underground's financing.

Annex 3: Improving Bus Services and the London Bus Initiative

Paragraph	*Comment*
10	These are not targets, they are target ranges!
26	'Key' is not defined. But the 2011 target time is rather slow for something that is to be a short-term priority. CrossRail is planned to be open before even the 'key' bus corridors are upgraded.

See also comments on Chapter 4F.

Annex 4: The congestion charging scheme for central London

Paragraph	*Comment*
10	See Part A for a discussion of the congestion charging scheme.
15	Buses: It is not clear how the Mayor plans to influence the pay and conditions of bus operating staff, other than via the 'TfL Bonus'. National Rail: what level of capacity increase will this provide? The lines to Marylebone cover only a very small proportion of the rail market.
21	This glosses over the conflicts that will remain – e.g. between buses and loading, on the main roads.
22	This is on the basis that there will be no roadspace reallocation, thus speeding-up all the motorised modes. See Part A for a discussion of this.
26 & 27	These lists are of no help – they are just what *could* be done. This draft Strategy should really be consulting on what the Mayor *proposes* to do.

Annex 5: Accessibility Action Plan

See comments in relation to earlier chapters, which read across to this Annex as appropriate.