

Draft Mayor's Transport Strategy Consultation

WEST LONDON ALLIANCE RESPONSE

September 2017

THE CHALLENGE

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

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

London's Transport Matters

During a time of such unprecedented growth in the capital's population it is more important than ever that we work together strategically to identify and respond to the most significant challenges we face and address them together in a joined-up way. This approach will ensure that West London boroughs and London as a whole will be able to respond positively to these challenges and ensure they do not become a constraint on future growth.

Public Transport and Quality of Life

We note the fact that the majority of future population growth will occur in outer London. This will make it increasingly important that residents and businesses have access to well connected, fast and cost effective orbital public transport options that connect the capital's largest growth areas alongside the well-established radial network.

We would strongly agree that many parts of outer London are cut off from the opportunities the rest of the city has to offer by poor tube, rail and bus links. Finding strategic, cross borough solutions to orbital connectivity will be an essential part of the solution to this issue.

We note that there appears to have been an oversight by not considering growth in journey numbers on a larger geographical scale? For example we know that London's population will continue to grow well into the 2040s, as will the home counties, yet the plan indicates that there will be no increase in the number of trips from outside London from 2015 to 2041 (page 277). This does not appear to be a credible assumption. It may be the scale used (millions) is not appropriate but in either case we would like to see a clearer rationale for such a fundamental assumption given the implications for Outer London.

Future Growth

Orbital Transport, such as the proposed West London Orbital rail line, provides significant opportunities to reduce congestion on existing transport infrastructure and unlock significant housing and employment potential. This should be explicitly referenced in this section.

Big Data

There has been a data explosion over the last decade from individuals, local authorities, TfL/GLA, business and others. London, specifically the boroughs, GLA, London Councils and TfL, needs to better manage, share and coordinate the use of its data to promote advances in transport technology. It would be useful if the final MTS could make stronger reference to this with indications on how it will compile and share this information.

THE VISION

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

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

The ambition stated in the draft MTS for cars to comprise only 20% of journeys by 2041 is a challenging but welcome target and signals the scale of London's ambition to lead the way globally in mode shift and in the reconfiguration of cities around people rather than cars. We see that the largest changes in modal shift will need to come from outer London as current car use into, through and within the outer London area currently make up 43% of journeys. We note that Central and Inner London already meet the 20% target, suggesting Outer London faces a serious challenge.

In order to achieve a shift of this scale, Londoners will need ready access to high-volume travel options that reflect their travel patterns and are more attractive than private cars. The West London Orbital Proposal that West London boroughs have been working with TfL and the GLA on over the last year, tracks closely the route of one of the most congested roads in London, the North Circular/A406, and also connects some of London's most significant growth areas including Brent Cross, Wembley, OPDC and the Hounslow Opportunity Area. This line would give drivers a practical, accessible and, crucially, faster option for getting around North and West London than is currently possible, aiding the GLA to hit the 2041 target of 80% of trips being by foot, cycle or public transport.

There is a danger that without interim targets and milestones we will not commence the delivery of the MTS at the pace required to deliver the vision. We feel it is essential to include interim targets or milestones and would expect the final MTS to set these at appropriate intervals between now and 2041.

We welcome the new investment in cycle infrastructure and ask that Outer London receives an effective share of this, reflecting that it is here that the vast majority of current and future growth will be (MTS page 28). While inner London may offer an 'immediate opportunity', the MTS targets are long term. Outer London faces far greater challenges, in terms of modal shift, than any other part of London. We will welcome news on how the delivery of further measures and investment will unlock the 'huge untapped potential' outer London has for cycling (MTS page 30).

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

- To what extent do you agree or disagree with the aims set out in this chapter?

- by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day;***
- for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041;***
- for all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London's entire transport system to be zero emission by 2050;***

- *by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public;*
- *to open Crossrail 2 by 2033;*
- *to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor;*
- *to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared with the full network;*
- *to apply the principles of good growth.*

In terms of London Suburban Metro, we strongly support proposal 83, that the Mayor, through TfL and relevant boroughs, will examine the feasibility of delivering a new London Overground rail link between Hounslow and Old Oak, and assess options for an extension towards Cricklewood.

We also support more broadly the development of a cross-borough orbital suburban metro and strategic corridors that allow Londoners to get around the places they live and work (see answer to question 19)

We applaud the drive to further encourage active travel, particularly more walking and cycling. It would be of great assistance to the delivery of these ambitions if our Public Health colleagues could be engaged with more and brought into this agenda given the relationship between transport and the health of the population. There is an opportunity to align the work of these traditionally different areas to both improve the way cities work, to help people get around and to improve the health and well-being of the population.

The emphasis of the Mayor on Healthy Streets is welcomed. If funding is directed to streets that can deliver all ten indicators, as opposed to streets that are more movement than place in function, and not all indicators can be delivered, we create polarisation. Nice places connected by poor quality, unsafe roads. We prefer to see the 10 indicators as aspirational and hope the scale of improvement towards the indicators is the winning factor for progressing schemes.

We are not convinced by the slightly artificial separation in the MTS of London Buses from other causes of road deaths, the aim should simply be for there to be no more road deaths irrespective of the cause.

In addition, we should be reducing all accidents - while labelled as 'slights' on an individual level, this could mean off work with a broken leg for six weeks. The MTS should recognise this more explicitly.

We are delighted to see that improvements to the overall accessibility of the transport system will continue but significant accessibility gaps remain in West London. We would welcome more details on the Mayor's delivery of this vision and what the interim milestones will be and how stations will be selected for step free access.

HEALTHY STREETS AND HEALTHY PEOPLE

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

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

We are supportive of Proposal 3 - a London wide cycle network, but note that the Strategic Cycling Analysis does not consider outer London, where the majority of Londoners live and where most future growth will occur. This makes it difficult to see how the necessary mode shift from cars that will be required in outer London will become a reality without significant investment in an outer London cycle network.

The same issue is of relevance for the ambition to deliver a cycle route within 400m of 70% of Londoners. Currently, most Londoners live in outer London, most of the population growth will be in outer London yet outer London cycle routes, especially orbital routes are poor quality and sparse. In order for boroughs and subregions to deliver the Mayor's ambitions in relation to model we would value additional emphasis on cycle paths in Outer London over the coming years.

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

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

We support the ambitions of "Vision Zero", to reduce car deaths to zero. We feel that the only way that this will be achieved is through a change to the LIP guidance so that money can be spent on a wider number of projects rather than is currently allowed and in a more proactive way. We would welcome a more flexible approach that allows boroughs to make safety investments in the network based on more nuanced local intelligence that does not rely on accidents happening before any interventions can be taken.

London-wide support for lower speed limits is broadly welcomed given the clear relationship between speed and road safety and possibly air quality - driver behaviour being a significant factor for the latter. We also recognise however that different boroughs have different circumstances and so we would support an approach that allows individual boroughs to show local discretion in the application of speed limits in a way that is appropriate to local need and community support.

In terms of freight, we do not believe it realistic for operators to comply with the ULEZ and a direct vision standard at this time given the level of investment required from operators and the lead times from manufacturers for the delivery of new vehicles. This is further compounded, as the details of such a standard are still being developed. We do support the introduction of higher standards by the industry but until the standard is set and manufacturers are ready, we emphasise that the focus should be on behaviour change and education.

We believe it is essential to increase the riding standard of powered two wheelers (PTW) in London and welcome a motorcycle standard for London. We ask that the Mayor takes a stronger stance with the DfT following the CBT review in 2015 and pushes for more stringent licence regulation. Accident statistics are not collected for licence type but we can assume that the majority of PTW less than 125cc are ridden with Compulsory Basic Training (CBT) licences. This being the case, 68% of PTW accidents involve CBT riders.

We are unable to take a view on the use of motorcycles in bus lanes without further evidence on safety or the wider implications of this for the network.

We also note a lack of police presence on our roads. Fear of crime is a high priority for residents and business.

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

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

We fully agree that addressing crime and the fear of crime should appropriately be a core element of the MTS, reflecting the fact that this is a top concern for Londoners, who need to feel safe whilst travelling if the city is to continue to prosper in the decades ahead.

Moped crime is a particular concern at the moment and we support the Mayor and police in taking appropriate steps to tackle.

References to bicycle theft are missing from the MTS. In addition a clear message of the provision of good quality parking would be welcomed.

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

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

We support and encourage the use of DSPs, not just for Central London but London-wide. Research shows that only 30% of businesses are interested in understanding their transport impacts but do not see delivery/servicing traffic as their concern. We would welcome greater communication between the Mayor and businesses supporting businesses (not just central) to consider their transport impacts.

We support the use of consolidation centres but note that London already has several consolidation centres, some of which are even specific to the construction industry. We expect any new consolidation centres to be independently financially viable unlike earlier attempts to develop borough led schemes. There is evidence that the logistics industry already operates efficiently as they work to respond their customers' demands - we suggest stronger engagement with business to consider the use of upstream consolidation and the implementation of DSPs.

We welcome a London Lorry Standard and look forward to working with the Mayor to develop one. We ask that the implementation of such a standard be carefully timed to allow operators and manufacturers time to comply.

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

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

No View - Borough and London Wide issue (TBC)

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

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

We broadly support these proposals but believe TfL need to work collaboratively with the boroughs and include TfL roads too where appropriate.

We question which wards and boroughs will be the first to act on these proposals as they could influence the relocation of some businesses to those parts of London that have not chosen to implement the proposals?

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

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

We note that a London-wide ULEZ is not part of the draft MTS. We are also concerned that the inner London ULEZ may have a perverse impact on the air quality in Outer London, especially in the vicinity of the North and South Circulars. We ask what additional measures will be available to assist boroughs mitigate any negative congestion or air quality impacts associated with a control London-only ULEZ.

Proposal 31 is unclear and requires more detail before responding. We cannot take a view on this proposal at this time.

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

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

We are pleased to see policy 7 supports the development of green spaces but feel the wording could be stronger than is currently the case. We ask for a more robust policy that will deliver more green space.

We appreciate the impact weather events can have on the transport network and look forward to resilience work; Policy 8 has the potential to cover a vast range of circumstances while proposal 45 suggests we have an unlimited budget. Can this be reworded to account for budgets.

A GOOD PUBLIC TRANSPORT EXPERIENCE

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

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

We fully support the aims of the mayor to improve the transport experience for all travellers and to help them to keep moving as the population of the city approaches 10 million people in the years ahead.

We would be interested to have more detail about how improvements are to be measured for Healthy Streets and what the interim targets will be to deliver this. Proposal 48 aims to make improvements measured against the Healthy Street indicators - we would welcome assurance that funding for Healthy Streets will be based upon the improvement achieved rather than on any bureaucratic process. Otherwise, places with better natural factors will flourish at the expense of poorer quality streets.

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

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

We support this - it is important that transport is affordable for everyone, including lower-wage and key workers.

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

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

Work to improve station accessibility is welcome but additional detail relating to how the proposals will actually be delivered would have significant value to boroughs. For example, what will be the process for selecting some stations for

improvement over others? We note that by 2041 many stations, including many in Outer London, will not have been upgraded - we ask that this additional detail be included in the final MTS.

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

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

Proposal 53 seems to omit the opinion of the boroughs and other stakeholders. It is also far too vague and requires a guarantee that essential users will still have access to a reliable service.

Proposal 54 implies that radial routes will take greater priority over other routes, including orbital, despite emphasis elsewhere in the strategy on the crucial role of improved orbital connectivity. We wish to remind the Mayor that in Outer London, orbital links are poor and buses are a major mode for many people, especially between town centres. There is also significant passenger demand for improved orbital rail routes. In the future as London continues to grow it will be these orbital routes that will need to be invested in order to have the greatest impact on reducing car usage. We ask that this be reflected in the final MTS.

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

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

We ask why Crossrail 2 does not stop at Imperial Wharf? We believe there is significant regeneration potential for it to be included.

There is a severe lack of orbital rail routes for Inner and Outer London. Given the clear, collective commitment from West London's Leaders and recent positive feasibility appraisal (see attached) we ask that the Mayor places a stronger focus on orbital routes and make a commitment to delivering a West London Orbital line from Hounslow to West Hampstead via the West London Orbital Line.

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

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

We do not have a West-London view on this question.

NEW HOMES AND JOBS

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

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

We fully support the principles of good growth set out in the draft MTS. It will be essential that these are fully integrated into the Local Plans and operational delivery of the MTS across a broad cross section of partners in both the public and the private sectors if they are to be realised.

One point to make in terms of converting the strategy into a reality is that a significant proportion of developers all too often ignore their transport and wider community commitments. For example, the West London "WestTrans" partnership of transport planning officers has recently inspected the cycle parking facilities at over 200 new developments and noted 17% of sites failed to provide any cycle parking at all and 56% provided less spaces than required. 92% of sites failed to provide good, reasonably spaced and safe cycle parking.

We request then that London government and TfL take a more robust stance on enforcement in new developments, especially in terms of quality as defined in the West London Cycle Parking Guidance 2017. If people can't store a bike, they won't own one and are less likely to use one.

We are pleased to see DSPs in proposal 77 and have already begun work to engage with businesses. We ask that TfL assist the boroughs with the use of DSPs by communicating their importance to businesses all over London.

Good growth should also allow for brave and innovative schemes to be developed, we would like to see how waste could be managed here through a pipe network - reducing the need for waste vehicles in the development area.

19. Proposals 78 to 95 set out the Mayor's draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving existing public transport services, providing new

river crossings, decking over roads and transport infrastructure and building homes on TfL land (see pages 202 to 246).

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

We support proposal 83, that the Mayor, through TfL and relevant boroughs, will examine the feasibility of delivering a new London Overground rail link between Hounslow and Old Oak, and assess options for an extension towards Cricklewood. The scheme makes use of existing underused freight lines and passenger lines along its entire length.

The West London Economic Prosperity Board, a cross-party, joint committee of West London boroughs has made this scheme a standing item on its agenda and West London boroughs will be incorporating it into Local Plans of individual West London boroughs.

West London boroughs have commissioned a full feasibility study into this scheme with the support of TfL. This study has found the scheme to be feasible and with a high level of passenger demand and strong strategic fit with the objectives MTS. It would have significant economic and environmental benefits with potential to unlock a significant volume of new housing and employment space in support of the principle of good growth. It will also benefit the environment through reducing the need for polluting and time-consuming orbital car journeys.

As well as its deliverability and strategic fit the line also has the potential to offer London an opportunity to test innovative new approaches to suburban-metro rail including making use of Battery-powered rolling stock rather than polluting diesel units or expensive electrification. It also supports the principle of good growth by making better use of what are currently severely under-used freight lines that happen to connect some of the most significant housing and employment growth areas in London including Brent Cross, Wembley, Park Royal, and the Golden Mile in Hounslow.

A general characteristic of the orbital schemes and suburban metro-rail that the draft MTS is supporting is that fares for orbital journeys, which by definition don't run across multiple fare zones, are lower than for radial journeys into and out of central London that do. This reduces the income generated per passenger for orbital journeys compared with an equivalent radial line. Given the fact that the majority of future growth in London will be in outer-London this is an unsustainable position. This is not then just a challenge for the West London Orbital Line but for orbital lines more generally that will need to be addressed if the GLA wants to meet its target to have only 20% of journeys by car by 2041. Many car journeys take place in outer London where the majority of Londoners

live, and these drivers will need good quality public transport alternatives if they are to make the mode shift from their cars in the coming years.

There are a number of practical and achievable solutions for addressing any initial shortfall in fares that could be implemented relatively easily. These are: 1) the use of modestly higher “premium” fares as are already in use by the Channel Tunnel Rail Link or the Heathrow Express service. 2) part of the line e.g. around the OPDC area could be re-designated as Zone 1 London, enabling higher fares and supporting further growth in the regeneration area. 3) operating costs could be brought down through greater use of technology that serves as a case study for innovation and best practice nationally e.g. battery-powered rolling stock.

As well as operating costs, there are also a number of solutions for resourcing the capital requirements associated with construction of the line itself. These include through the development of new housing and employment space along the route of the line, a variety of external sources, and possibly Central Government. It is estimated that the West London Orbital Line will release the development of at least 20,000 houses. Alongside securing funding it will also be possible to bring down capital costs through innovation and use of new technology e.g. battery powered trains that would negate the need for more expensive stabling and maintenance facilities for diesel rolling stock.

Further, more detailed GRIP stages and a Strategic Land Availability Assessment are now needed to explore the detailed specification of the line, and well as to develop a funding package for its construction and subsequent operation along the lines set out above.

We invite the Mayor and TfL to continue to work with West London boroughs to bring this line to completion by the mid 2020's and to support further detailed development work on the line and on scheme financing by including sufficient reference to this scheme in the final MTS.

We welcome the Mayor's decision to pilot new buses services in outer London. Given the wide geography of outer London, can the Mayor give any details on the operation of such a service? We very much see a demand response service filling the gaps in areas with the poorest connections.

We are encouraged to see the Mayor can consider decking over the A13 and has committed to looking at the feasibility. We ask the same for the A4 at Hammersmith, given the potential land values in Hammersmith and research provided by LBH&F, we expect this to be equally viable.

Figure 44 in the section, Focus On: New Homes and Jobs on Transport Land, must be a mistake - the Mayor must be aware that West London extends beyond old Oak Common? We expect this oversight to be rectified in the final draft.

We know Travel Plans can motivate businesses to think more about the facilities they offer and the mode their staff use to travel. Measures within travel plans already promote the Mayor's aims for Healthy Streets, active travel and modal shift. While we are pleased to see Travel Plan guidance will be updated, Proposal 94, it stops short of instructing new developments to employ them fully. We ask that this proposal be strengthened to: Developers are to ensure Travel Plans are employed at new developments to promote walking, cycling and public transport while discouraging the use of private cars, in-line with the Mayor's Transport Strategy. TfL's Travel Plan guidance will be updated to include the new policies in the MTS.

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

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

No West London view.

DELIVERING THE VISION

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

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

The proposals here are welcome and proportionate to the scale of the opportunity presented by changing technology. However, the section misses the wider point relating to big data sharing and the "smart cities" agenda, especially amongst the GLA, TfL, London Councils and the Local Authorities. Many of these organisations now hold spatial data on journeys, highways and other infrastructure, yet few of them use the same platforms, data labels or formats; making data sharing impossible. London needs to standardise its data storage, make more comprehensive, cross-cutting use of the GLA Datastore and engage with data users/app designers and start-ups to encourage better use of technology to solve many of our transport issues. If London as a whole can provide a complete and concise dataset, it will help it to become a destination for new transport technology and investment.

In terms of orbital connectivity there is an opportunity to trial world-leading battery powered train technology on the West London Orbital Line (proposal 83).

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

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

West London does not take a view on this (TBC).

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

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

We believe the new guidance and templates for the monitoring of LIPs to be overly detailed and as a result require significant bureaucratic capacity from borough officers to complete. We would greatly welcome the issuing of a streamlined LIP template by London government that will allow boroughs to focus on delivering excellent real-world outcomes for Londoners without being unduly caught up with administration.

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

The MTS describes a welcome vision for 2041. It is necessarily high level and strategic in nature, but says less about the interim milestones and targets that will be required along the way to deliver the ultimate ambition. We would strongly support the inclusion of material relating to the phasing and trajectory of various elements of the strategy so that we can as a partnership put the necessary mechanisms and resources in place to deliver the strategy at the necessary pace.

In terms of data and digital solutions to improving connectivity and boosting growth, it would be useful for there to be additional guidance on the use of new technology for monitoring, and for this to be reflected in the final version of the MTS.

The use of electric bicycles is absent from the strategy altogether and this feels like a significant omission. Electric bicycles have well-established health, wellbeing, environmental, congestion, noise, and air quality benefits that are all consistent with the objectives of the draft MTS. A notable body of evidence indicates that this mode will play a large and growing part in the future of our transport system and the MTS should be promoting their use.

