

Draft Mayor's Transport Strategy 2017

London Borough of Barnet Consultation Response

Thank you for the opportunity to comment on the draft Mayor's Transport Strategy (MTS). The publication of the draft MTS comes at a time when the London Borough of Barnet is concentrating on the future of transport policy in Barnet and is developing plans for the Council's own Long-term Transport Strategy. The Council is already working on several sustainable and inclusive travel initiatives, including improving local electric vehicle charging infrastructure and expanding the availability of car club services. This progress, and the proposals, policies and strategic direction of the final MTS, will be important considerations for the development of the Council's Long-term Transport Strategy and its alignment with the future Local Implementation Plan.

The draft MTS outlines a positive vision of London being a city where more people choose active travel and public transport over cars when travelling. However, it is the London Borough of Barnet's view that the draft strategy does not adequately distinguish the specific character and needs of outer London and Barnet in particular. Instead, the draft MTS seems more focused on delivering a transport system and infrastructure that is best suited to inner and central London. One obvious example is the lack of recognition in the draft MTS of the need for improved orbital connectivity on public transport, particularly for buses.

Moreover, the Implementation Plan in the draft MTS remains too broad, and divides the delivery of the strategy into three time periods: 2017-2020, 2020-2030, and 2030-2041. The draft MTS lacks a clearly articulated path to achieving that ambition and the final version needs to do more to identify and clarify the short term actions by the Mayor, TfL and the boroughs, and the contribution of these in progressing to the overall ambition.

The London Borough of Barnet shares many of the same goals articulated in the draft MTS, including improving air quality, reducing car dependency, and enabling more Londoners to walk and cycle, but achieving them in Barnet presents unique challenges that may require alternative solutions. With all of this in mind, the London Borough of Barnet has the following comments that we would like to be considered and incorporated into the final strategy.

Transport Mode Share

The draft MTS is explicit in that "the success of London's future transport system relies on reducing Londoner's dependency on cars in favour of walking, cycling and public transport use (p. 17)." Therefore, the headline aim within the draft MTS is that, by 2041, 80% of Londoner's trips are to be made on foot, by cycle or public transport. The London Borough of Barnet is supportive of the realisation of this aim, as it will help reduce health and economic inequalities across London.

However, this target is arguably somewhat misleading and obscures the task at hand, particularly for a largely outer London borough like Barnet. Data included in the draft MTS (p. 277, figure 57) shows that journeys within both central and inner London already meet or exceed the 80% target. All journeys between central and inner London, central and outer London, and central London and outside of London, also exceed the 80% target. The key areas for trips that require improvement to meet this target are only those within outer London, between inner and outer London, and between either outer or inner London to outside of London. In fact, by 2041, according to the draft MTS, trips within outer London and between outer London and outside of London will still not meet the 80% target. The headline target in the draft MTS is one that has already been broadly achieved in inner and central London, and the reduction of car dependency and a shift to walking, cycling and public transport remains a more pressing challenge for outer London and boroughs like Barnet. The final MTS should better reflect this and adopt headline targets for outer London trips, and for travel between inner and outer London, as well as outer London and outside of London.

Furthermore, it could be argued that this target of 80% is perhaps unachievable in Barnet without corresponding improvements in public transport for orbital travel routes for which some would argue the private car is currently the only viable means of transport.

Public Transport and Orbital Movements

The draft MTS partially recognises the public transport challenges facing outer London, in particular the need for more reliable, accessible, affordable and demand-responsive bus services. The commitment to extending the Hopper fare to include unlimited bus and tram journeys within the hour (p. 121) is positive for outer London and Barnet, as bus remains the only way to make certain journeys on public transport. Research into travel affordability by London Councils has already highlighted the reliance on buses in outer London, particularly amongst low-paid Londoners working in the region. From this perspective, the commitment by the Mayor to freeze fares across the TfL operated transport network and extension of the Hopper fare by the end of 2018 is also welcome.

However, orbital routes are not sufficiently identified, discussed or tackled in the document. More emphasis is needed as to how orbital routes will contribute towards a significant mode transfer, and what support and initiatives will be required to deliver the improvements. In the draft MTS, the vision for Outer London, as outlined on p. 31, makes no reference to orbital routes. Barnet remains underserved by orbital public transport routes and without them the car will remain the most reliable and effective means of travelling across the Borough. Improved orbital connectivity also has a deep impact on economic growth and the overall success of the Borough's many town centres.

Bus is the only real option for many orbital public transport journeys in this part of outer London and too many destinations in adjacent counties. However, proposal 54d (p. 137) seeks to improve bus priority on key radial routes only. Whilst this is important, rapid orbital bus routes are desperately needed in Barnet, with improved frequencies and capacities. Greater prioritisation of such routes is necessary, and the Council has already advocated strongly for improvements to orbital bus routes, including for the extension of the 125 TfL bus route to Colindale.

There are also no proposals for any orbital rail links going through Barnet (the potential Crossrail 2 and Brent Cross / Cricklewood London Overground extensions will only provide orbital links heading both east and west out of Barnet). Barnet needs to seek a stronger and more detailed commitment from the Mayor to improve orbital transport links.

If potential orbital rail links such as a London Overground extension into Barnet via Brent Cross or Cricklewood were approved or considered further, the Council believes TfL and the Mayor should also explore the fare model behind these services to ensure they are financially sustainable and equitable. In the north-sub region and Barnet in particular, there is a risk that orbital rail services will cross zone boundaries less frequently, resulting in lower fare charges when compared to radial rail journeys of equivalent distances.

Education

The Borough has large numbers of diverse schools, particularly faith schools with extended catchment areas – school travel planning doesn't adequately tackle the challenges in this situation and further measures may be needed. The final MTS should provide more of a focus on the needs of educational based trips.

The draft MTS (proposal 25, p. 91) makes a clear commitment to tackling air pollution hotspots, including those around schools by using the Mayor's Air Quality Fund and other funding. The London Borough of Barnet's Environment Committee has already reminded the Mayor that a study commissioned by the City Hall found the air around 15 Barnet schools to be polluted with NO₂ above the legal limit of 40 µg/m³. Notably, all schools but one were sited either on or around five TfL administered roads.

Ultra Low Emission Zone (ULEZ)

In common with other London boroughs and areas near to the busy roads of outer London, Barnet continues to exceed national targets for air pollution. The stated intention to extend the ULEZ to almost all of Greater London for heavy diesel vehicles is encouraging as it would undoubtedly reduce NO_x levels by some degree, particularly on polluting TfL roads. The London Borough of Barnet's Environment Committee has already written to the Mayor to request that City Hall undertake an

assessment of the impact the ULEZ is likely to have on Barnet generally and on the areas surrounding the 15 above mentioned schools specifically.

Much of Barnet would not benefit from the proposed ULEZ extension for light vehicles in 2021, owing to the currently proposed area reaching up to, but not including, the North Circular, therefore excluding a large part of the Borough. It also presents the risk that Barnet roads outside the ULEZ, particularly the North Circular, will become even more polluted as motorists seek to avoid the charge.

Traffic Reduction, Car Use and Parking Restraint

The draft MTS plans for a 15% reduction in car mode share for journeys within outer London, including Barnet, by 2041.

Although there is no new London wide parking standard set out in the document it is clear that the next version of the London Plan due out for consultation November / December 2017 will seek to again tighten parking policy across London, as a result of the information and objectives presented within the draft MTS.

The London Borough of Barnet has its own parking standards which represent higher provision of parking than the existing London Plan. These standards are currently being reviewed, and the revised standards are expected to be available for discussion and adoption during October / November 2017. It is likely that the next iteration of the London Plan will further reduce parking standards for Outer London, which may not align with the Council's intentions.

The ambitions in the draft MTS in relation to reduced car use are only realistically deliverable in the context of introducing road user charging, yet the draft document does not provide enough explicit detail into the likely introduction of such a scheme. The draft MTS (proposals 19 and 21, p. 83) states that: "The Mayor will give consideration to the development of the next generation of road user charging systems", and that "TfL will work with those boroughs who wish to develop appropriate traffic demand management measures, for example local (TfL or borough) road user charging or workplace parking levy scheme." However, these proposals need greater clarification given the fundamental role this will need to play in delivery. The evidence base for the MTS requires road user charging to be introduced in order to achieve the mode shift that will enable the target of 80 per cent of all trips by 2041 to be made by walking, cycling or public transport. In terms of delivery, the Implementation Plan (pp. 271-275) schedules "Work with boroughs to develop traffic reduction strategies, including traffic reduction strategies" to run over the 2017-2020 and 2020-2030 periods. However, road user charging is not mentioned specifically in the Implementation Plan. Moreover, there is no clarity as to whether TfL will seek to introduce road user charging on the Transport for London Road Network (TLRN).

This relates to another a key point. Barnet does not have direct control of key through routes in the borough, such as the A1, M1, A41, and A406, and the final MTS must place adequate responsibility on those who administer such roads (TfL and Highways England) to help contribute to car reduction targets on their networks in Barnet. These are key strategic routes that would benefit from greater consideration in the final MTS. Equally, the origins and destinations of traffic on these routes are not necessarily within Barnet and, while the draft MTS correctly recognises that borough traffic reduction strategies enable different approaches to reducing vehicle demand to operate in different parts of London (pp. 83-85), the final MTS must also acknowledge that traffic reduction strategies will require cross-borough collaboration and greater input from TfL.

Overall, the final MTS must instigate a process by which TfL takes a greater lead on policy changes and exercises levers to reduce car usage, such as road pricing strategies, in consultation with London boroughs. The final MTS will require a more detailed outline of its intentions and delivery plan for the introduction of road user charging.

Healthy Streets

The Healthy Streets Approach demonstrates positive and ambitious thinking from a public health perspective, recognising the important connection between transport and improved health. However, more guidance is needed than is otherwise provided in the draft MTS from the Mayor and TfL on what the Healthy Streets Approach looks like in day to day practice and how it can be delivered. How will the Healthy Streets Approach actually shape local delivery, planning and development?

Barnet is also a diverse borough with differing street environments, and areas of dense and sparse housing settlement. Therefore, the Healthy Streets approach is unlikely to become a “one size fits all” approach for Barnet. The final MTS would benefit from outlining expectations as to how the Healthy Streets approach can be interpreted locally so that it is appropriate for specific environments in Barnet.

Walking and Cycling (Active Travel)

The draft MTS envisages London as a city where people choose to walk and cycle. Barnet has historically seen lower levels of walking and cycling recorded in the borough and needs to encourage more residents to undertake more active travel. At last September’s Environment Committee, the Committee resolved, amongst other items, that a Cycling Strategy for Barnet should be formulated as part of the overall Transport Strategy for the Borough and agreed to further steps to install more cycle infrastructure in Barnet.

The London Borough of Barnet recognises that the application of the Healthy Streets Approach to the design and management of street environments intends to make cycling and walking more attractive, safer and more accessible.

Considering the range of urban, sub-urban and semi-rural settings within Barnet, it is difficult to picture how such an approach would work in practice across the whole of Barnet. Barnet would benefit if the final MTS outlined in greater detail what sort of street environments best encourage higher levels of active travel in various urban settings, and the sort of cycle infrastructure and cycle lane engineering solutions that are best suited.

As Barnet currently has fewer on-road cycle lanes, but a good number of routes available to cyclists through parks and signed links on quieter roads, the final MTS should consider in greater detail the potential of green and open spaces to help deliver attractive and accessible cycle routes, in addition to town centres and residential streets. Barnet would also benefit from hearing further detail in the final MTS about what cycle improvements are to be expected on TfL roads.

The draft MTS proposes (Proposal 3, p. 51) the expansion and improvement of cycle networks in London so that 70% of Londoners will live within 400 metres of a high-quality and safe cycle route by 2041. However, the proposed new cycle routes (p. 53) partially reinforce the current radial bias of London's transport system, despite it being well-recognised that London lacks good orbital routes that offer an alternative to car travel. This is most certainly the case in Barnet. It is of greater benefit to Barnet if the future cycle network in 2041 covers far more of outer London and introduces more orbital routes. Otherwise trips by car will remain the primary mode of transport for journeys between Barnet's town centres, and the borough will struggle to best contribute to overall car reduction targets.

The draft MTS also proposes (Proposal 6, p. 57) to increase the use of TfL's Cycle Hire Scheme as well as future models of cycle hire (dockless bikes etc.). So far, such schemes have largely benefited inner and central boroughs, and are yet to expand to or see widespread adoption in Barnet. Barnet would welcome a commitment in the final MTS to extend TfL's cycle hire into the southern parts of the Borough, including Childs Hill and Golders Green.

The draft MTS also mentions the increasing levels of data TfL is now collecting on cycling and walking patterns, which will enable increasingly tailored navigation and improved planning. It is the London Borough of Barnet's understanding that, in its current state, the London Travel Demand Survey (LTDS) measures trips rather than journey stages, which results in only the dominant transport mode being recorded for a trip. For instance if an individual travelling to work cycled or walked to a station, and then spent the majority of the remainder of their trip travelling by train, the LTDS would record the mode of that trip as train, ignoring the journey time spent cycling.

The LTDS is a valuable data source, but it may be of further benefit if these additional journeys could also be captured, to help provide a fuller picture. More broadly, Barnet recognises the wealth of cycling analysis and data held by TfL, and would welcome steps to make it further available to boroughs.

Corridors and Scale of Growth

Barnet has some significant areas of growth, aiming for 28,000 new homes, which are likely to put additional pressure on available highway space. The table below illustrates Barnet’s housing growth in terms of the increasing number of households in the period 2011-2039.

2011 Census	2015	2021	2031	2039
136,000	150,000	162,000	181,000	189,000

The table below illustrates Barnet’s population growth

2011 Census	2015	2021	2031	2039
356,000	393,000	415,000	448,000	469,000

At Environment Committee on July 11th 2016, the report titled “*Moving Around Barnet – a Direction of Travel*” identified the redevelopment and regeneration projects in Colindale, Brent Cross Cricklewood, West Hendon, Mill Hill East and Stonegrove/Spur Road Estate, as key sites where housing growth must be considered alongside future transport development. The draft MTS places considerable emphasis on ensuring such projects incorporate the Healthy Streets Approach. In addition, there is a central assumption within the draft MTS that, with the growth of high-density development in the capital, people will become less reliant on cars for their journeys and the Healthy Streets Approach will plan for a more active lifestyle within an increasingly compact environment. Increasing mode share within these developments by walking, cycling and public transport can assist in avoiding gridlock on a highway network which is already under stress from volumes of vehicular traffic. The Council will further explore this in the development of its own transport strategy. Over the coming decades, this pattern of development will take place in considerable parts of Barnet; however, much of the borough is likely to remain low-density, particularly within the central and northern reaches of the borough.

The draft MTS is clear that it wants to unlock further growth potential and intensification through new rail links, including Crossrail 2, the Bakerloo line extension, the Elizabeth line extension, and expansion of the London Overground network through the devolution of suburban rail services. Within the draft MTS, there are two particular rail schemes of significance for Barnet that might unlock further growth potential in the Borough. However, both schemes need firmer commitment and clarification from the Mayor in the final MTS.

1) London Overground extension from Old Oak to Cricklewood / Brent Cross (Dudding Hill Railway Line)

This is included in the draft MTS as a possible route to be reopened, and commits the Mayor, TfL and relevant London boroughs to involvement in a feasibility study for the scheme (proposal 83, p. 209), however the core route is

seen as Hounslow to Old Oak with a possible section to Cricklewood. The draft MTS also includes a map (p. 239) detailing a potential London Overground extension from Old Oak to Brent Cross. Barnet's agenda is for this route to be reopened to support sustainable and convenient orbital movements and town centre growth, and reduce demand on the North Circular.

At present, options for a route to Cricklewood or northwards via Brent Cross into the core of the borough are being tested for initial feasibility by the West London Alliance, and the commitment towards this scheme from the Mayor should be tightened and more detailed in the final MTS.

2) Crossrail 2 (New Southgate branch)

The inclusion of New Southgate station in the draft MTS as a station on Crossrail 2 is positive for Barnet. Crossrail 2 can play a key role in unlocking further growth in eastern Barnet and support reduced car-dependency development within certain ward areas of Barnet.

However, the draft MTS and Implementation Plan insufficiently clarify the phases by which branches such as New Southgate to Seven Sisters are to be expected as part of the overall delivery of Crossrail 2. The draft MTS (p.149) mentions the unequivocal endorsement of Crossrail 2 by the National Infrastructure Commission in 2016, but fails to mention that a report by the Commission in the same year titled "*Transport for a world city*" stated that the Commission suggested the delivery of the New Southgate to Seven Sister branch should be deferred to a later phase, considering the high costs of the proposals. While the Council recognises the need for effective and responsible financial management of Crossrail 2, it is of great benefit to Barnet if the New Southgate extension is not deferred. At the very least, the final MTS should give greater indication as to the phases and dates by which specific parts of Crossrail 2 are expected to be delivered. The Council would also welcome a commitment from the Mayor and TfL to retain the New Southgate to Seven Sisters branch in the earliest possible phase of Crossrail 2 delivery.

The draft MTS only briefly mentions the importance of the Thameslink Programme in also driving growth in London. The Brent Cross Cricklewood development is Barnet's most significant growth and regeneration programme and is underpinned by the construction of a new Thameslink railway station, delivered by the Council with Network Rail, which will link the Brent Cross Cricklewood development to King's Cross St Pancras in under 15 minutes. However, this is largely overlooked within the draft MTS when compared with other new rail projects. The final MTS must do more to recognise the importance of this specific Thameslink project in driving growth.

Injury Accidents

In Barnet, the number of collisions involving vulnerable road users is among the highest level in London. Barnet, in absolute numbers, also has the highest number of Killed and Seriously Injured collisions in London. Barnet is a TfL priority borough, with initiatives such as community speedwatch in place.

The MTS proposes a zero-accident environment from 2041 onwards for serious and fatal accidents. With the challenges Barnet faces, this is a most welcome ambition. However, the practicality of this target is questionable. The draft MTS also provides insufficient direct support to boroughs to help realise this target, and lacks specific targets over time for the period between 2017/18 and 2041.

The Healthy Streets Approach encourages reducing speed limits to 20mph and designing streets to keep speeds low. The Council would welcome a commitment from the Mayor to support more 20mph speed limits in Barnet in locations where residents think they are needed.

Interaction with areas outside of London

There is minimal reference in the draft MTS about how London should connect and integrate transport with neighbouring counties beyond Greater London. This is of particular relevance for Barnet, as the Borough has considerable interplay with the Hertfordshire region and Hertfordshire County Councils Highways and Transportation function, which do not enjoy transportation systems as sophisticated as London's and are not well integrated with it. Without co-ordinated improvements with adjacent counties, outer London boroughs like Barnet will struggle to realise the car reduction targets of the MTS, particularly for those journeys between outer London and outside of London.

Funding

The draft MTS recognises that achieving a transport system that meets London's needs and can successfully deliver the policies and proposals of the strategy requires additional funding that is both stable and secure (p. 265). This, according to the draft MTS, necessitates a new approach to funding and delivering the transport network, and highlights road user charging, land value capture and greater devolution of financial powers as possible measures. More detail in the final MTS on when new approaches might be introduced and how they will enable the Mayor, TfL and boroughs to better fund infrastructure projects would be beneficial.

Equalities, Inclusion and Accessibility

Barnet Council's Strategic Equalities Objective (SEO) is that citizens will be treated equally, with understanding and respect, and will have equal access to quality services which provide value to the tax payer. The draft MTS makes repeated reference to how proposals and policies can make travelling in London more accessible and inclusive, which is positive. So too is the inclusion of an Accessibility

Implementation Plan, staged in five year intervals. The London Borough of Barnet welcomes proposals which aim to improve the experience of public transport to provide choice for people with disabilities and carers and enable them to travel independently and with confidence. For example, improved physical access to public transport, as with the proposed step free access at Mill Hill Broadway Railway Station, and improved signage both on vehicle place signage and vehicle destination announcements.

Thank you again for the opportunity to comment on the draft MTS. The London Borough of Barnet hopes the final iteration of the document reflects the comments made in this response, so that the MTS can enable Barnet and all other boroughs to best deliver the aims of the strategy.