

Mayor's Transport Strategy (MTS)

October 2017

Executive Summary

About us

Heart of London Business Alliance serves as the voice for 500 businesses and 100 property owners in the Piccadilly & St James's and Leicester Square areas. Our purpose is to support the commercial well being of the businesses and organisations we represent, and ensure our areas remain integral to London's West End offer as a place for people to visit, live, trade and work.

The Mayor's Transport Strategy 2017

The Mayor of London has published a draft of his Transport Strategy. This outlines a vision for London's transport system for the next quarter century and sets policies that must be implemented by local government. Transport for London is by far the largest element of the Mayor's budget, and he has a fairly free hand over this area of policy (compared to say, policing, counter-terrorism or housing). It seeks to meet the challenges of poor air quality, climate change, rising population and congestion on the network.

At its heart the strategy promotes a new 'Healthy Streets' approach to encourage a shift away from cars towards walking, cycling or public transport. The core vision is that by 2041, 80% of journeys in London will be made by these methods compared to 64% today. There is a strong push to improve London's air quality, with around half of emissions coming from transport sources. A new 'Toxicity Charge' (T-Charge) is due to come in on October 23 for the Congestion Charge area and there are proposals to speed up and widen the Ultra-Low Emissions Zone (ULEZ) to cover much of inner London and all of London for HGV's. It also outlines the investment required in the public transport system over the next few decades to support growth, including the need for a deal to be agreed to deliver Crossrail 2. Overall the strategy is more continuity than change with Boris, with stronger rhetoric on air quality and cars. However, radical or controversial measures are generally 'reviews' or only implemented decades hence.

Heart of London held a briefing session for members on 15 September 2017 to explain the strategy and seek the views of our members. We particularly thank Q-Park for their knowledgeable feedback and their progressive approach to parking and air quality. Heart of London have also participated in joint response by Business Improvement Districts in Westminster and across central London.

Our response

We consider that the most significant transport challenges currently facing central London are air quality and congestion. Heart of London, alongside all the Westminster BIDs are actively involved in freight and waste consolidation schemes which seeks to tackle these issues in their respective areas.

We welcome the vision outlined in the Mayor's Transport Strategy, and support the Healthy Streets agenda, focus on air quality and the 80% overall target for walking cycling and public transport by 2041. However, we are disappointed that the draft targets set in the strategy are so long-term and often unambitious given the scale of the congestion and pollution problem in London. On areas which are entirely within the remit of the Mayor of London, such as buses, a zero emissions target of 2037 for the fleet lacks ambition. We would hope that the Mayor could deliver this significantly earlier, particularly in central London.

Major contributors to congestion are freight and waste services provided to smaller businesses. We believe the Mayor should therefore focus on how he will seek to work with smaller businesses to encourage them to participate in freight and waste consolidation schemes, such as those established by Heart of London. We would expect that BID's would have a major role in shaping proposals in this area.

As a general position, we support the enabling of more walking and cycling in central London to free up road space, improve air quality and the overall user experience. As part of this approach, we are particularly keen to ensure that the benefits and challenges arising from the likely changes to Oxford Street are studied, understood and appropriately applied to other public realm improvement schemes, such as any future proposals for Parliament Square and the wider West End.

A major driver of congestion has been the growth in PHV which have increased from 55,000 vehicles in 2013/14 to 80,000 vehicles today. We support the Mayor lobbying for the powers to cap overall numbers. However, the language on taxis and PHV lacks any significant ambitions given the unsustainable growth of numbers. Exemptions for black cabs from the ULEZ significantly reduce the effectiveness of that policy given the disproportionate impact of black cabs on air quality.

We strongly welcome the inclusion of Pedicabs in the strategy. Pedicabs are a growing problem in London's West End, with estimates that there are around 1400 operating in the city. We urge the Mayor and TfL to press the Secretary of State for Transport to bring forward legislation this parliament.

Heart of London strongly supports the harnessing of new technologies to deliver the Healthy Streets approach. However, we would be concerned around the wide scale adoption for autonomous cars in Central London, without appropriate regulation, particularly where this conflicts with the goal of increasing walking and cycling. Significantly more detail will be required about how electric vehicle charging can be rolled out across London given the strain on the grid is already posing challenges.

We have some concerns about the unfunded commitments in the strategy, notably Crossrail 2. Our members are fully supportive of delivering this vital project as soon as possible, and recognise that business should rightly contribute to part funding it. With the Business Rate Supplement for the Elizabeth Line due to continue for some time after it has opened, there should be careful thought about the timing of any new levy on business, particularly in the context of the significant rates increases in the last year.

- Heart of London strongly supports many of the principles and ambitions of the Mayor's Transport Strategy.
- We are nonetheless concerned that it is not ambitious enough in its timetable, and in some areas offers vague assurances without providing the detail or plausible methods for implementation.
- With Central London having the most pressing need from poor air quality, we would also welcome the Mayor considering how many of the measures and targets can be brought forward for central London.
- Lastly, we are concerned that the draft strategy is not ambitious enough in terms of the regulation and reduction of private hire vehicles and taxis.

Response to consultation

CONSULTATION QUESTIONS ON CHAPTER 1 – THE CHALLENGE

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

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

We consider that the most significant transport challenges currently facing central London are air quality and congestion. Heart of London, alongside all the Westminster BIDs are actively involved in freight and waste consolidation schemes which seeks to tackle these issues in their respective areas.

While the focus on infrastructure investment is strongly welcomed, the challenge is rather narrowly drawn as an issue of population growth, road congestion and public transport crowding. To deliver the aspiration of making London's transport 'zero emissions' by 2050 the challenge of the electrical infrastructure in the city must be included, particularly in the context of delivering EV charging points at scale. A significant proportion of electricity substations in central London are already at or near capacity.

In addition, a major driver of congestion has been the growth in private hire vehicles (PHV) which have increased from 55,000 vehicles in 2013/14 to 80,000 vehicles today. We are therefore disappointed that the Transport Strategy does not make a direct reference on this point within the challenges, and feel that overall there is little ambition in the proposals to tackle emissions or congestion caused by taxis or PHV.

CONSULTATION QUESTIONS ON CHAPTER 2 – THE VISION

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

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

*Multiple choice: strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

- 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?**

- a. by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day. Multiple choice: **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion**

- b. 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. *Multiple choice: **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion*
- c. 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. *Multiple choice: strongly support / partially support / **neither support nor oppose** / partially oppose / strongly oppose / no opinion*
- d. 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. *Multiple choice: strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*
- e. to open Crossrail 2 by 2033. *Multiple choice: **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion*
- f. to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor. *Multiple choice: **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion*
- g. 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. *Multiple choice: strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*
- h. to apply the principles of good growth. *Multiple choice: strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

Our members welcome the vision outlined in the Mayor's Transport Strategy, and support the Healthy Streets agenda, focus on air quality and the 80% overall target. We recognise that shifting from journeys by private car, private hire vehicle (PHV) and taxis to walking, cycling or public transport is vital to meet the challenges faced by the city.

However, we are disappointed that the draft targets set are so long-term and often unambitious given the scale of the congestion and pollution problem in London. There is an appetite for more urgent action from our members, particularly in central London, and we would propose the final strategy set interim targets and measures to achieve changes far sooner in central London, such as by the opening of Crossrail 2 in 2033.

The issues within central London are radically different to Outer London, with a current 90% modal share for local journeys by foot, cycle or public transport, and 95% for trips between inner and central London. A more ambitious target for central London is clearly necessary in this context. Congestion and crowding is not just limited to the roads, but extends to public transport, pavements and even cycle lanes. Investment in the public realm and transport improvements in the West End could truly transform our city into a model of green infrastructure. A world class public realm is good for business and is something that our members fully support.

On areas which are entirely within the remit of the Mayor of London, such as buses, a zero emissions target of 2037 lacks ambition. We would hope that the Mayor could deliver this significantly earlier, or at least deliver a zero emissions fleet in central London and pollution hotspots by a much earlier date. Clearer and accelerated targets for zero emissions, not just zero emissions capable, taxis, PHV and coaches are also required, as well as strengthening enforcement on idling.

Major contributors to congestion are freight and waste services provided to smaller businesses. We believe the Mayor should therefore focus on how he will seek to work with smaller businesses to encourage them to participate in freight and waste consolidation schemes, such as those established by Heart of London. We would expect that BID's would have a major role in shaping proposals in this area.

Overall, we would appreciate a more detailed breakdown of how these long-term targets will be reached, with interim targets at regular intervals and a relevant breakdown by area, transport mode and demographic. As the targets currently stand it would be very hard to hold the Mayor, GLA and TfL accountable for their delivery and ensure London is on course to become a zero carbon and zero emissions city.

CONSULTATION QUESTIONS ON CHAPTER 3 HEALTHY STREETS AND HEALTHY PEOPLE

4. Policy 1 and proposals 1-8 set out the Mayor's draft plans for improving walking and cycling environments.

- **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.**

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

As a general position, we support the enabling of more walking and cycling in central London to free up space, improve air quality and the overall user experience. This is particularly pertinent given the West End's major contribution to the UK and London's economy and the importance of remaining attractive to new investors, occupiers and tourists.

As part of this approach, we are particularly keen to ensure that the benefits and challenges arising from the likely changes to Oxford Street are studied, understood and appropriately applied to other public realm improvement schemes, such as any future proposals for Parliament Square or the wider West End. We would be concerned about schemes causing displacement of traffic and would argue for a more holistic and coherent vision for central London. This will require long term engagement with stakeholders.

Regarding the Healthy Streets principles, these should be promoted and applied at the first opportunity to the Transport for London network as well as local authorities' streets in a consistent way. The Healthy Streets Check tool should be published by TfL as soon as possible and a simplified version should be available to BID's and the public to audit the quality of existing streets, and make the case for change.

A lack of secure cycle parking in the right locations can also be a disincentive for workers to commute. The nature of the building stock in the West End does not always make it possible to provide facilities. We are aware of

excellent initiatives such as the Holborn Cycle Vault, but facilities like this need a critical mass of coverage and better publicity to work, alongside a safer and more pleasant cycle routes. We would be happy to work with TfL to identify new sites for secure cycle parking such as exiting underground car parks.

The success of this approach to the public realm will require major investment. Much further detail is required on the ambition of TfL to deliver and fund schemes.

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

- **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.**

*Multiple choice (plus comment): **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion*

We support the measures outlined but would like to see a more ambitious target than 2030 for no one to be killed in, or by, a London bus.

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.

- **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.**

*Multiple choice (plus comment): strongly support / partially support / **neither support nor oppose** / partially oppose / strongly oppose / no opinion*

Our members continue to be concerned about the cumulative effect of low level anti-social behaviour, theft and robbery. Central London must remain a place where residents, workers and visitors feel safe, and while we appreciate the importance of tackling 'high harm' crimes, this should not be at the expense of visible, responsive policing. The West End Impact Zone has had an extremely positive impact on our area, with a 34% reduction in crime since it was implemented.

We welcome the focus on designing out crime and would be keen to work with TfL around ensuring the public realm around West End stations is as safe and accessible as possible. In particular the presence of rough sleepers and beggars around major stations and bus interchanges is hugely negative to the perception of the area. Associated anti-social behaviour is a huge issue for our members and a disincentive for visitors to come to the West End.

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.

- **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.**

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

We are pleased that the Mayor references the need to work with business and the freight industry to improve the efficiency and safety of freight and servicing and believe in a strategic approach. We are therefore keen to understand the details of how this engagement and commitment would work in practice. Heart of London, alongside other BIDs would hope to have a major role in developing future proposals in this area, particularly given the important work already undertaken around consolidation.

We are supportive of encouraging our members to reconsider existing approaches to personal deliveries. We have a Deliveries and Waste Coordinator who is actively liaising with member businesses to consider alternative options. We would call on TfL to work with businesses and use its planning powers to first develop a much more effective network of click and collect hubs across central London. This would yield positive benefits across the city with lower traffic volumes. Some of our members, such as Q-Park in Chinatown, already provide click and collect points for both food and goods. They have also set up contractor boxes for tradesmen. We would expect TfL would work closely with both BIDs and individual businesses that have been leading the way on this issue to date to develop a plan for the future and to develop collaborative solutions.

We are slightly disappointed that the strategy appears to place an additional burden on individual large businesses given TfL has the powers to create a level playing field of access controls and consolidation. We also believe more emphasis should be placed upon the role of smaller businesses and encouraging their participation in consolidation schemes, such as those established by Heart of London – as well as working with major distribution hubs of fresh produce to enable their support.

8. Proposals 18 and 19 set out the Mayor’s proposed approach to road user charging.

- **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.**

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

We are concerned that these proposals are currently too vague and have no timescale for development or delivery. We would in principle support, and be particularly keen to see the details of, a future ‘smarter’ system with differential charges by type of traffic, time periods and distance travelled – potentially within the area broadly covered by the Circle Line as this is where the challenges of congestion and air quality are currently greatest. We would also like to see proposals expedited by the Mayor for consultation and are concerned that once again the strategy is not ambitious enough due to its focus on the longer term rather than immediate action.

9. Proposals 20 and 21 set out the Mayor’s proposed approach to localised traffic reduction strategies.

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

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

Differences in policy and approach between boroughs will make area-wide and ambitious schemes hard to implement. The Mayor, through TfL, must show leadership and give robust support to local authorities to deliver on shared goals. Traffic reduction strategies need to be applied to both local roads and to the Transport for London Road Network (TLRN) to fully realise their effectiveness.

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.

- **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.**

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

We strongly support the over-riding ambition to make London a 'zero carbon city' but once again are concerned that the timetable to achieve this is not ambitious enough. Once again, we would be keen to see a detailed timeline of implementation and plans to see central London expedited without leading to displacement to neighbouring areas. Within this context, we support the Mayor's ambitions to introduce the ULEZ in 2019 but remain concerned that too many exemptions exist and that the plans do not include sufficient incentives for black cabs to participate.

There remains a strong likelihood that once zero emissions capable (ZEC) vehicles' electric supply charge runs out, they will continue to operate in central London using petrol. Fully zero emission taxis and PHV, rather than just hybrid or zero emissions capable vehicles should be mandatory as soon as possible in central London.

We note that there are proposals for the creation of new fast changing points for taxis. A significant proportion of electricity substations in Central London are already at or near capacity. Indeed, a Heart of London member who has installed charging points in their car park cannot add additional charging infrastructure as the grid cannot support it. We would ask for much greater detail and a timeline on these proposals, as they are at the heart of delivering on the air quality agenda.

We would also refer to our answer to question 3, that we would want to see buses in London transition to zero emissions well before 2037, and much sooner still in central London.

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.

- **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.**

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

We support the policies outlined in the Strategy to protect the natural and built environment, as long as restrictions in the planning system are proportionate and effective. Additional greening and canopy cover in the West end would be welcome, though there is a lack of detail about how the 1% increase in cover would be achieved and the financial commitment to this goal. We support efforts to protect, promote and enhance London's built heritage and sites of cultural importance, particularly with many of the nation's most important sites in the West End of London. We appreciate recent policy guidance in this area in the Mayor's Supplementary Planning Guidance on Culture and the Night Time Economy.

Regarding transport related noise and vibration; we are broadly supportive of the policy outlined within this sphere, as long as this does not lead to undue costs or delays in the expansion of the Night Tube. We would hope that future planning policy would reflect the direction outlined by the Mayor on the night time economy, and protecting venues.

CONSULTATION QUESTIONS ON CHAPTER 4 - A GOOD PUBLIC TRANSPORT EXPERIENCE

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

- **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.**

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

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.

- **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.**

*Multiple choice (plus comment): strongly support / partially support / **neither support nor oppose** / partially oppose / strongly oppose / no opinion*

As a principle, we also strongly support the ambition of creating a more affordable and accessible high quality public transport system. We believe further consideration could therefore be given to greater flexibility on weekly, monthly or annual season tickets to incentivise walking or cycling. We also remain concerned that the Mayor's ambitions run counter to those of National Government, who have adopted the principle that commuters should be paying a greater proportion of their travel costs, including on many of the rail networks which workers use to access Central London. We would call for a major rethink on how London transport is funded, so that it can be made increasingly affordable.

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.

- **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.**

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

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.

- **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.**

*Multiple choice (plus comment): strongly support / partially support / **neither support nor oppose** / partially oppose / strongly oppose / no opinion*

In terms of the bus network, we believe there is the opportunity to undertake a wholesale review of the network, building upon the successful reduction in the number of buses serving Central London. At the time Heart of London responded positively to those changes, and the results have been positive. When focusing on rationalising buses, we would welcome further thought being given to the greater regulation of bus routes and the introduction of a series of hubs for coaches to alleviate the pressure on Victoria Coach Station as well as appropriate parking or waiting areas for coach trips to avoid inappropriate idling around theatres, other cultural institutions and tourist destinations.

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.

- **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.**

*Multiple choice (plus comment): **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion*

We support the proposals to invest in the rail and tube network, though would hope the programme of track and station upgrades to be delivered faster if a more sustainable funding settlement for London could be agreed. Heart of London fully supports Crossrail 2, and we hope that this vital new infrastructure can be delivered by 2033.

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.

- **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.**

*Multiple choice (plus comment): strongly support / partially support / **neither support nor oppose** / partially oppose / strongly oppose / no opinion*

We believe that consideration needs to be given to the installation of more fast electric charging points (including for black cabs) and how London can establish a more robust network to power zero emissions vehicles, given the pressure on the existing supply of electricity is already problematic, and has placed limit on new infrastructure.

A major driver of congestion has been the growth in PHV which have increased from 55,000 vehicles in 2013/14 to 80,000 vehicles today. We support the Mayor lobbying for the powers to cap overall numbers. However, overall the language on taxis and PHV lacks any significant ambitions given the unsustainable growth of numbers. Exemptions for black cabs from the ULEZ significantly reduce the effectiveness of that policy given the disproportionate impact of black cabs on air quality. As previously stated in question 10, much greater ambition is required on these areas where the Mayor already has significant powers.

We strongly welcome the inclusion of Pedicabs in the strategy. Pedicabs are a growing problem in London's West End; with estimates by the pedicab trade themselves that there are around 1400 operating in the city and only 400 registered to the voluntary code of conduct. Fares are not fixed or consistent. Neither vehicle condition nor driver quality is assessed. The behaviour of pedicab operators causes problems for businesses; blocking highways, harassing and ripping off customers and causing serious risk to visitors and workers.

We urge the Mayor and TfL to press the Secretary of State for Transport to bring forward legislation this parliament. We would also call on him to include a commitment that any regulatory scheme for pedicabs would include measures to protect against rip off fares and touting by their drivers, in addition to measures to ensure safety, security and ease congestion. While the Department for Transport has indicated it supports measures to regulate pedicabs, legislation to enable this has not been forthcoming to date. We would hope that TfL would continue to work with businesses to design an appropriate and effective regulatory regime and push for legislation at the earliest date.

CONSULTATION QUESTIONS ON CHAPTER 5 – NEW HOMES AND JOBS

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

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

*Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion*

We strongly support the provision of more affordable housing across London, which is critical to businesses' ability to attract and retain good quality staff. We nonetheless believe that affordable housing should be located in the right areas, and not dilute the economic importance and contribution of the Central Activities Zone (CAZ). The Mayor rightly recognised that the CAZ has the highest potential for creating new jobs vital for London's growing

population. With this caveat, we would urge the Mayor to use his powers and role as a land-owner to enable more people to be able to afford to live closer to where they work.

We look forward to responding to the detailed proposals to implement the 'Good Growth' agenda when the draft London Plan is published.

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.**

*Multiple choice (plus comment): **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion*

As above, we strongly support the provision of more affordable housing across London, which is critical to businesses' ability to attract and retain good quality staff. We nonetheless believe that affordable housing should be located in the right areas, and not dilute the economic importance and contribution of the Central Activities Zone (CAZ).

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?**

*Multiple choice (plus comment): strongly support / partially support / neither support nor oppose / **partially oppose** / strongly oppose / no opinion*

Our members largely support the creation of new airport capacity in London and the South East as vital to the continuing prosperity of our city, and so we do not support the Mayor's position on Heathrow. However, we do share the Mayor's view that appropriate infrastructure must be built to ensure that a very welcome increase in visitors can reach central London through public transport, and not add to congestion and air pollution.

CONSULTATION QUESTIONS ON CHAPTER 6 – DELIVERING THE VISION

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

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

Multiple choice (plus comment): **strongly support** / partially support / neither support nor oppose / partially oppose / strongly oppose / no opinion

Heart of London strongly supports the harnessing of new technologies to deliver the Healthy Streets approach. However, we would be concerned around the wide scale adoption for autonomous cars in central London, without appropriate regulation, particularly where this conflicts with the goal of increasing walking and cycling. Our members support a vision where our streets and inner cities are pleasant places to be, and this requires a simultaneous effort to improve air quality, reclaim space for walking and cycling and reduce congestion. As a result we support the cautious proposed approach responding to changing technology.

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?**

Multiple choice (plus comment): strongly support / **partially support** / neither support nor oppose / partially oppose / strongly oppose / no opinion

We support fair funding for London's transport system, including the devolution to TfL and the GLA of additional powers and taxes as necessary. However, we have some concerns about the unfunded commitments in the strategy, notably Crossrail 2. Our members are fully supportive of delivering this vital project as soon as possible, and recognise that business should rightly contribute to part funding it. With Business Rate Supplement for the Elizabeth Line due to continue for some time after it has opened, there should be careful thought about the timing of any new levy on business, particularly in the context of the significant rates increases in the last year.

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?**

Multiple choice (plus comment): strongly support / partially support / neither support nor oppose / **partially oppose** / strongly oppose / no opinion

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

Heart of London strongly supports many of the principles and ambitions of the Mayor's Transport Strategy. We are nonetheless concerned that it is not ambitious enough in its timetable, and in some areas offers vague assurances without providing the detail or plausible methods for implementation. With Central London having the most pressing need from poor air quality, we would also welcome the Mayor considering how many of the measures and targets can be brought forward for Central London. Lastly, we are concerned that the draft strategy is not ambitious enough in terms of the regulation and reduction of private hire vehicles and taxis.

[Online response here](#)