



Boris Johnson
Mayor of London
(MTS Statement of Intent)
Greater London Authority
City Hall
The Queen's Walk
London SE1 2BR

Transport planning

Direct line: 020 7525 5564

Facsimile: 020 7525 5683

Our reference: 20091125_MTS_draft

Your reference:

Date

Dear ,

Southwark Council welcomes the opportunity to comment on your draft Transport Strategy. Southwark Council recognises the complexity in developing and delivering transport improvements within London and having considered the document the council would like to raise the following issues.

Whilst the council acknowledges the long term nature of the document, the Transport Strategy reflects two time periods, up to 2017 representing the current TfL business plan and beyond this to 2031. The initiatives and actions identified up to 2017 reflect current plans and this lacks the ambition found in previous Mayoral transport documents. In addition the London landscape will change significantly within this time period and the transport network should reflect these changing needs. In the longer term, greater ambition is required to provide the drive and impetus to identify the projects and funding to meet the changing transport needs of the capital.

Major transport projects

On a more local aspect, the document recognises the important link between transport improvement and land use growth. Southwark contains a number of opportunity areas including Elephant and Castle, the Aylesbury Estate and Peckham. Southwark is one of the fastest growing boroughs in London and is one of the few areas which is unlikely to significantly benefit from the committed major transport projects, which include the tube upgrades and Crossrail. The council has previously made representations regarding the Crossrail levy.

The draft MTS does not commit further public funding to the improvement of key transport interchanges in the borough even though part of the strategy for managing congestion at central London rail termini involves improving interchange at early points in the network classed as strategic interchanges. In particular, Elephant and Castle is expected to see significant growth in passenger numbers as a result of line upgrades and background growth. It appears that there is an underlying assumption that the redevelopment scheme will fund any infrastructure improvements required to deal with the additional capacity requirements whether generated by the redevelopment or by reconfiguration of the existing tube network. Whilst it is accepted that there will be developer contributions to secure large scale infrastructure improvements needed to accommodate new proposals, investment is likely to be required from TfL. This is particularly important where there has been underinvestment in the past.

Peckham Rye is also identified as a strategic interchange but again no funding for the necessary improvements has been identified. Given the need for regeneration in this area passing the whole costs to developers would be unrealistic and is likely to make the proposals undeliverable.

It is noted that the Cross River Tram (CRT) does not appear in the strategy even for further consideration post 2018. It is also noted that no alternative public transport improvements are identified that would provide the same step level change for key regeneration areas such as the Elephant and Castle, Aylesbury estate and North Peckham. Although the possible extension of the Bakerloo Line is welcome, it appears unlikely to provide the same improvement in accessibility for key regeneration areas such as the Aylesbury estate. In view of this the council would wish early engagement over the options for the Bakerloo Line extension to ensure it meets the aspirations set out in the core strategy and emerging area action plans. As part of these discussions consideration can be given to provision for Camberwell given that neither the option of reopening Camberwell Station or providing a new overground station are included in the draft strategy.

The South London Line is not referenced in the MTS. The future of this line is currently under review and the results of the current TfL / London Travelwatch study should feed into the final MTS. The East London Line phase 2 (extension to Clapham Junction) is confirmed in the MTS however here remains uncertainty over the proposed Surrey Canal Road station (shown on the map but not currently funded) and Brixton High Level (not shown).

Bus operation and the need to review bus route planning

Southwark has a high reliance on the bus network particularly within the central areas of the borough. These buses provide both positive and negative impacts and the effects of operation within central London are often carried over to these areas. The MTS proposes a continuing review of bus services, but currently this only happens at the end of bus operator franchise periods. The council considers there is a need for a more fundamental analysis of bus provision across London, rather than incremental review.

Traffic network

One of the greatest challenges facing Southwark is managing traffic flows in the borough particularly given an increasing population. Shadowing this is an overstretched public transport system for which only minor investments are proposed particularly in the 2017 time period. The council supports the improved coordination of works on the highway network, however the borough would encourage a more rigid, detailed and longer term programme to support the overall reduction of vehicular traffic on the road network.

It is noted that while the draft MTS implies that pedestrians as well as vehicles may be beneficiaries of 'smoothing the traffic flow', the stated priority of this objective over others such as public realm

Transport planning – Regeneration and neighbourhoods department, Council offices, Chiltern, Portland Street, London, SE17 2ES

Switchboard - 020 7525 5000 **Website** - www.southwark.gov.uk

Interim Director – Richard Rawes

improvements and quality of life factors may counteract this. There is concern that In practice, a default priority for traffic may make it more difficult to obtain approval (where appropriate) and funding from TfL for future projects that seek to prioritise pedestrian amenity

Road safety

London is facing one of its greatest challenges to improve the safety of those using our roads. Improving safety within our community for those living, working or visiting the borough is one of the council's key ambitions. In response to 'Way to Go' and the statement of intent the Council expressed support for a greater emphasis on improving safety. It is with disappointment that this has not been reflected in the draft and the council would like to reiterate the need for road safety to be given greater priority within the final MTS particularly as on your own road network (TLRN) there is a disproportionate level of collisions compared to that of borough roads. Therefore road safety should have a greater weighting within your policies.

The council is equally disappointed that the draft MTS does not set out a coherent speed reduction programme that would support our own 20mph strategy. The focus on enforcement is welcome, but no new resources are identified for this purpose. A great deal is staked on the introduction of average speed cameras, but the feasibility and benefits of these cameras in London are yet to be proven. The wider benefits of reduced speed limits are not fully acknowledged.

Walking and cycling

The MTS does not set out a convincing approach for encouraging walking. Improved way-finding (Legible London) is welcome, but may not be directly relevant outside the central area. Further increases in walking are likely to depend on sustained investment in the public realm and no further funding is identified to deliver such improvements. Whilst it is acknowledged with the draft strategy that there is a potential conflict between the focus on smoothing traffic flows and the desire to provide a public realm where people can relax, socialise and enjoy the atmosphere of a world city there is no indication of a clear strategy to resolve that conflict.

While cross-borough initiatives to promote cycling are welcome (hire scheme, superhighways), it is disappointing that there is no clear programme or additional funding identified to deliver the concept of 'biking boroughs'

Air quality

Whilst the council is making a separate response to the Mayor's draft air quality strategy it is noted that the MTS identifies challenging targets to reduce CO2 emissions, but lacks a coherent strategy to achieve these. The Local air quality factors are also not considered sufficiently. In practice, more may have to be done to manage demand on the road network if the targets are to be achieved

Thank you for the opportunity to comment on the Transport Strategy and if you would like to discuss any of the issues raised above please contact Sally Crew on 020 7525 5564.

Yours sincerely

Cllr Paul Kyriacou
Executive Member for Environment

Cllr Paul Noblet
Executive Member for Regeneration