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Dear Mr Khan,

LB Barking and Dagenham Response to Draft Mayor's Transport Strategy (MTS) Consultation

The London Borough of Barking and Dagenham welcomes this opportunity to provide our views and comments on the policies and proposals outlined in the draft Mayor's Transport Strategy (MTS). The main recommendations we wish to make are outlined below.

Key Issues

The draft MTS compliments the vision and themes of the Council's recently published Borough Manifesto and underlying strategies including the Council's Health and Wellbeing Strategy, independent Growth Commission report and forthcoming Local Plan and Transport Strategy. Therefore it is broadly welcomed, but the Council is concerned that despite the ambitious long term targets some policies lack ambition and that more investment in new transport infrastructure is necessary to help the borough deliver 55,000 new homes and 20,000 jobs over the next 25 years.

New Transport Infrastructure

Barking and Dagenham is London's next big growth story. Over the next 25 years, the Council has ambitious plans to deliver 55,000 new homes and 20,000 new jobs. The Council is committed to growth, to playing its role in London and delivering for its community. We have ambition and aspiration to become a destination of choice, where people stay and feel welcome. However, to achieve this ambition requires the provision of a comprehensive, sustainable high-quality transport network with reliable, affordable services into, out of and through the borough.

Barking and Dagenham already faces some significant transport challenges which, if not addressed, will severely hamper the Council's growth ambitions. These include:

- Poor public transport connectivity to and within parts of the borough and issues surrounding quality/frequency of some services. The areas to the north of the A12 and south of the A13 in particular remain poorly served with few connections to other parts of the Borough;
- Worsening of the performance of the road network. The main junctions on the A12 and A13 have frequent congestion problems (in particular, the Movers Lane, Choats Manor Way and Whalebone Lane junctions), whilst journey time reliability on a number of key corridors within the borough remains poor, particularly at peak hours;
- Poor air quality and traffic noise adjacent to some sections of the highway network. The A13 in particular has been identified as an area for improvement, having been designated an Air Quality Action Area by TfL;
- The fragmented nature of the borough's cycling and walking links which often acts as a deterrent to their greater use;
- Crime is a significant concern for residents in Barking and Dagenham, with 40% of people questioned in a recent Residents Survey rating it as their main concern, whilst nearly half of residents said they felt unsafe in their local area after dark;
- Although the number of adults and children killed and seriously injured on the borough's roads has decreased by more than half in the last 10 years (down from 52 in 2005 to 24 in 2015), the high percentage (62%) of pedestrian, cycle and motorcycle casualties remains a cause for concern (GLA casualty figures, 2016);
- Issues remain surrounding the accessibility of public transport services/facilities in some parts of the borough – particularly for the elderly and disabled. Station accessibility issues, compounded by lack of step-free access at Becontree and Dagenham East stations.

To help address these challenges and to deliver its overarching growth ambitions, the Council has identified its top ten transport priorities. Some of these are included in the draft MTS which we welcome. These are set out below:

1. An A13 Riverside tunnel involving the undergrounding of a 1.3km stretch of the A13 to reduce severance, improve air quality and to unlock land at Castle Green for redevelopment as well as improve traffic flow supported by a new station at Castle Green on the recently approved London Overground Extension;
2. A13 junction improvements at Movers Lane, Lodge Avenue and Renwick Road to address issues of congestion, road safety and poor air quality and to enhance north-south connectivity, particular for ELT services;
3. A Lower River Roding crossing linking Barking Riverside with Beckton in Newham with provision for a DLR/tram link to Gallions Reach/Royal Docks. This would address the significant severance issues caused by the River Roding; link London Riverside to the Royal Docks, including Crossrail at Custom House and the DLR extension to Thamesmead; and act as a catalyst for the regeneration of the existing industrial areas around Creekmouth/River Road and help the delivery of Stage 4 of Barking Riverside;
4. An Upper River Roding crossing between Abbey Road and Quay Road/Freshwater Road in Barking Town Centre as a precursor to establishing a new DLR/tram linking Barking with Gallions Reach and the Royal Docks; and to support the development of new homes/jobs in Barking Town Centre;
5. A future onwards extension of the Barking-Gospel Oak line to Abbey Wood to link to Crossrail services;

6. Comprehensive improvements to Barking Station to address issues of overcrowding and poor access and to support future growth in Barking Town Centre;
7. A direct rail connection from Barking to Stratford to enhance connectivity to this important sub-regional hub, classified as an International Centre in the London Plan, and to maximise the growth potential of the borough and the economic regeneration potential of Barking town centre. Ultimately 15 Crossrail trains an hour will run into Stratford and track and signalling upgrades at Forest Gate would allow for some Elizabeth line services to divert to Barking via the existing Barking-Gospel Oak line;
8. A new mainline rail stop at Dagenham East station to bolster the ambitious plans for london-east-uk, including the planned development of film studios;
9. Moving Barking station into Zone 3/4 and stations at Dagenham Heathway, Dagenham East and Dagenham Dock into Zone 4 to reduce the cost of travelling between the borough and other parts of London - particularly to those who may find it least affordable;
10. Securing improvements to the bus network and services, including the potential for a north-south transit system connecting Marks Gate to Barking Riverside, reviewing bus services to maximise accessibility to Crossrail services, an east-west transit system connecting the key town centres and growth areas in London Riverside; and improved connections to health and education facilities; improved journey time reliability and providing fully accessible bus and bus stop infrastructure.

In addition, there are a number of other improvements which are necessary to support the Borough's ambitious growth plans and which should be addressed in the final published version of the MTS or failing that the East London Transport Opportunities Study:

Short term – to 2021:

- a) The extension of night Tube services to the borough is supported, particularly as a means of boosting the night time economy;
- b) Introduction of river passenger services from Barking Riverside to provide a direct link to the key employment hubs of Canary Wharf and central London and improved cross-river connections;
- c) Providing infrastructure to encourage greater levels of cycling and walking – especially for shorter journeys – and to enhance inter-borough connectivity. This includes the potential eastwards extension of Cycle Superhighway 3 and a new segregated cycleway from Barking station to Chadwell Heath station; and securing the extension of the Mayor of London's and/or other Cycle Hire Schemes to the borough;
- d) Renaming the Hammersmith and City line as the Hammersmith and Barking line to reflect that Barking is the terminus for Tube services on this line;
- e) Facilitating a network of charging points, including rapid-charging points, to encourage the up-take of electric and other low-emission vehicles.

Medium term – to 2031:

- f) Improvements to and the longer-term redevelopment of key borough transport interchanges, at Dagenham Heathway, Dagenham East, and Becontree to unlock new homes and improve access;
- g) Exploring how the potential, set out in the strategy, for rolling out distance based road charging across London could be applied to Barking and Dagenham as a means of reducing traffic and encouraging a switch to more sustainable modes of travel and to generate income to fund new and improved public transport infrastructure and services.

Long term – to 2041:

- h) Exploring the potential for a future HS1/HS2 interchange at Barking Station to provide improved links between east London and the rest of the UK and Europe and to stimulate growth in the wider Thames Gateway area;
- i) Lobbying the Department for Transport (DfT) to upgrade rail freight routes outside London so that non-London freight can be taken around London, thereby freeing up rail paths on the Barking-Gospel Oak and C2C lines for additional passenger services.

Response to Consultation Questions

1) London's transport challenges:

The Council considers that the main transport challenges in London have been identified, although it should be recognised that the extent of these challenges and their impact varies significantly across the capital. Outer London in particular suffers from poor public transport connectivity, with a lack of orbital connections, which in many cases is fuelling an overdependence on cars and in turn is leading to increasing problems of congestion and worsening air quality. As set out above, Barking and Dagenham faces some significant transport challenges and if investment in new infrastructure and services is not forthcoming, problems such as congestion, public transport overcrowding and pollution are likely to worsen – particularly as the borough's population is anticipated to grow by as much as 24% by 2030.

2) The Mayor's vision:

The central aim of the draft MTS for 80% of all Londoner's trips to be made on foot, by cycle or using public transport by 2041 is a laudible one and one the Council supports. However, achieving this vision will require significant investment in new transport infrastructure and services – particularly in outer London – but many of the measures proposed remain uncosted and unfunded.

3) MTS aims:

The Council broadly agrees with the draft MTS aims, although consideration should be given to bringing forward the target dates for achieving a zero emission transport system and reducing traffic volumes, particularly given the damaging effect of pollution on people's health. A reduction in traffic volumes will also make the task of eliminating deaths and serious injuries from the capital's streets easier, although

sustained investment in infrastructure and training for more vulnerable road users will also be required.

Whilst supportive of the aim by 2041 for all Londoners to do 20 minutes of active travel to stay healthy each day (Policy 1), the Council is concerned whether this will be achievable, particularly given the vast inequalities experienced in different areas of the capital. For example, Barking and Dagenham is ranked as the third most deprived Local Authority in London and has the highest proportion of overweight or obese children aged 10-11 in London and England, whilst one in four of children aged 4-5 are overweight or obese - the third highest in London. In addition, over two-thirds of adults are classified as overweight or obese – the highest proportion in London and significantly higher than the London and England averages. In addition, the borough has the highest proportion of inactive adults in England, with more than 4 in 10 doing less than 30 minutes of exercise per week.

4) Improving walking and cycling environments:

The Council supports the Mayor's ambitions to make London a city where people choose to walk and cycle, particularly as a means of promoting healthy living. The proposals to deliver a London-wide network of cycle routes, with improved infrastructure to tackle barriers to cycling (Proposal 3) is welcomed, although greater emphasis needs to be placed on delivering improvements in outer London boroughs if car dependency is to be reduced, with a particular need for more orbital routes, especially between key town/district centres. The Council is also keen to secure the extension of TfL's Cycle Hire Scheme and/or other models of cycle hire to the borough as a means of encouraging greater levels of cycling.

We would strongly urge the Mayor and TfL to continue funding boroughs to enable them to work with schools, employers and community groups to promote walking and cycling as healthy, sustainable modes of travel. Barking and Dagenham has benefited from such funding in recent years, enabling the set-up of a hugely successful active travel programme across the borough which in the last three years has delivered:

- Cycle training to over 6,100 adults and 5,800 children;
- 58 school cycle clubs within 23 borough schools;
- Around 1,000 new cycle parking spaces;
- Twice monthly Dr Bike sessions;
- A series of events to promote cycling, cycle training and skills;
- 24 Safer Urban Driving Courses, attended by over 340 people.

5) Reducing road danger and improving personal safety and security:

The Council supports the Mayor's aim for London's streets to be safer and we welcome the plan to adopt 'Vision Zero' for road danger in the capital and the ambitious target that by 2041 no person will be killed or seriously injured on London's roads (Policy 2). However, reference should also be made to the need to reduce the number of 'slight' injuries from road collisions as these remain stubbornly high in many parts of London. The proposals to reduce the danger posed by motor vehicle journeys – with its focus on safe speeds, safe street design, safe vehicles and safe

people – are welcomed, although ensuring compliance with 20mph speed limits will be challenging without the full support of the Metropolitan Police.

Whilst we welcome the focus on improving motorcycling safety – the high percentage of motorcycle casualties in Barking and Dagenham remains a cause for concern – we remain unconvinced of the merits of allowing motorcycles to access bus lanes.

6) Reducing crime on London's streets and transport system:

Measures aimed at improving the personal safety and security of all users of the transport network (Policy 3) are particularly supported by the Council. Crime is a significant concern for residents in Barking and Dagenham, with 40% of people questioned in a recent Residents Survey rating it as their main concern, whilst nearly half of residents said they felt unsafe in their local area after dark.

Decluttering streets and removing unnecessary barriers in the interests of creating environments which encourage walking and cycling has been a key priority for the Council in recent years. We are concerned that the requirement of the Metropolitan Police for certain types of vehicle mitigation measures to be installed on streets to counter the threat of further terrorist attacks, could potentially discourage cycling and walking as well as acting as a barrier to those with certain types of disability. Further consideration therefore needs to be given as to how this requirement aligns with the 'Healthy Streets' approach.

7) Tackling congestion and improving the efficiency of streets:

Whilst the Council is supportive of the Mayor's aim to reduce traffic on London's roads by 10-15% by 2041, we consider that prioritising space-efficient modes of transport (Policy 4) will have limited effect unless this is backed up with substantial investment in new, accessible bus and cycle network infrastructure and services, particularly in outer London. In addition, a clearer definition of 'essential traffic' is required – and whether or not this should include taxis and private hire vehicles, which we consider not to be particularly space-efficient modes of transport. However, we recognise that they are a vital mode of transport for those with certain access needs.

Proposals to better manage freight activity on the capital's roads (Proposal 15) are welcomed, although the draft MTS aim to reduce the amount of construction traffic and overall van and lorry use should apply to the whole of London, not just central London. Many town centres in outer London already experience problems with freight traffic and this is likely to worsen as the capital grows, particularly in those areas with plans for substantial new developments, including Barking Town Centre which is designated a Mayoral Housing Zone with scope for upwards of 6,000 new homes.

8) Approach to road user charging:

The Council supports the Mayor and TfL in exploring the potential for rolling out distance based road charging across London as a means of reducing traffic and encouraging a switch to more sustainable modes of travel and to generate income to fund new and improved public transport infrastructure and services. We consider such measures to be essential if the ambitious targets in the draft MTS are to be met.

9) Approach to localised traffic reduction strategies:

The Council welcomes the acknowledgment from TfL that the approach to reducing traffic will vary in different parts of the capital and welcomes any support it can provide in helping the Council and its partners (including local businesses, freight operators, schools and residents) develop a robust strategy for the borough. However, the Council would also like TfL to apply the same approach to its own road network in the area – principally the A13, A12 and A406, which are sources of substantial traffic generation in the borough.

10) Reducing emissions to help London become a zero carbon city:

The Council is broadly supportive of the approach proposed by the draft MTS to tackle pollution and improve air quality in London (Policies 5 & 6). However, we are concerned that the proposals do not go far enough to address what is a significant problem affecting large swathes of the capital and is a particular issue in parts of Barking and Dagenham.

Air quality adjacent to some sections of the borough road network is very poor - the A13 in particular has been identified as an area for improvement, having been designated an Air Quality Action Area (AQAA) by TfL in 2011 (the whole borough was designated an Air Quality Management Area in 2008), and is likely to deteriorate further as traffic and congestion levels are predicted to increase.

Air quality is an important Public Health issue in London. It contributes to shortening life expectancy, disproportionately impacting on the most vulnerable. According to research undertaken by King's College London, of the 3,537 deaths across London in 2010 attributable to long-term exposure to small particles (PM_{2.5}), 92 of these occurred in Barking & Dagenham. Added to this are the costs to the economy of the health impacts of poor air quality. The associated cost to Barking and Dagenham, a borough where mortality rates attributable to poor air quality are some 38% higher when compared with the UK average, is not insubstantial.

Given the scale of the problem, therefore, the Council considers it imperative that the Mayor and TfL introduce a London-wide Ultra Low Emission Zone (ULEZ) as soon as possible. Coupled with measures to roll-out low emission and zero-carbon vehicles and supporting infrastructure, as well as the introduction of effective behaviour change programmes, such a move will not only lead to improvements in public health in the borough and the reduction of health inequalities across London, but is also likely to bring additional benefits for the economy and environment, both locally and London-wide.

11) Protecting the natural and built environment and minimising transport-related noise and vibration:

The draft MTS proposals to protect existing and provide new green infrastructure as a means of enhancing biodiversity and ensuring that everyone has access to nature (Policy 7) are strongly supported by the Council. Similarly, we support the proposals for reducing the number of Londoners exposed to excessive noise and vibration levels from road transport (Proposal 46), whilst recognising the need to carefully

consider issues such as the impact on residential amenity when encouraging measures such as night time deliveries.

12) Providing an attractive whole-journey experience:

The Council supports the approach laid out in Policy 9 and Proposal 48 of the draft MTS that advocates applying the Healthy Streets approach to direct complementary public transport and street improvements to provide an attractive whole journey experience and to encourage mode shift away from the car.

13) Improving customer service and affordability of public transport:

We welcome the commitment by the Mayor to maintain all current concessions, freeze fares across the TfL-operated transport network and expand the Hopper fare to enable customers to make unlimited bus transfers within the hour.

We maintain that in order to improve perception about the proximity and links to central London, Barking station should be allocated within a new zone 3/4 and stations at Dagenham Heathway, Dagenham East and Dagenham Dock in Zone 4 on TFL's London rail and tube map. The current map exemplifies the anomaly of Barking being in zone 4 when nearby Stratford is in zone 2/3. It makes no sense having East Ham as zone 3/4 as unlike Barking and Stratford it is not an interchange station. Such a move would also reduce the cost of travelling between the borough and other parts of London - particularly to those who can least afford it.

14) Improving the accessibility of the transport system:

The Council is concerned that Policy 12 in the draft MTS is not ambitious enough in seeking to address the needs of people with disabilities or older people. For example, Proposal 52 only commits to step free access at selected rail and underground stations and on all new infrastructure. This is unlikely to include Becontree and Dagenham East. We consider the plan must target making all stations step free by 2041 so all groups have equal access to the rail and underground network and provide them with increased opportunities to access employment, education, health and leisure facilities across London. Further accessibility improvements are also necessary at Dagenham Dock Station given the plans for the Ford Stamping Plant and Beam Park which will see this become an important interchange;

We welcome the commitment in Proposal 51 to providing better staff training to all bus drivers, particularly the need to understand that passengers often have different needs/requirements. In addition, the proposal for all trains and stations to be adequately staffed to ensure that there is someone available to provide assistance/information if required is also welcomed.

15) Transforming the bus network:

The Council welcomes the recognition that the Mayor gives to the important role of buses in improving public transport access and supports the plans to reduce and remove existing services where they are no longer required in central and inner London, and use this freed-up capacity to provide new or improved services in outer London (Proposal 53). Barking and Dagenham is one of the few boroughs in London

to buck the recent trend of declining bus patronage – in part due to the unprecedented levels of population growth we are experiencing. We recognise that TfL have invested significantly in local bus services and welcome this. This investment has delivered significant improvements to bus services across the borough including to Barking Riverside and the extension of route 5 to Queen's hospital which have been top priorities of the borough. However, further expansion of the local bus network and enhancements to existing services will be required if the Council's growth ambitions are to be realised. Specific priorities for the Council include a north-south transit system connecting Marks Gate to Barking Riverside; an east-west transit system connecting the key town centres and growth areas in London Riverside; and improved connections to health and education facilities across the sub-regional area.

The Council is broadly supportive of the need to improve bus journey times and reliability (Proposal 54), particularly on key orbital and radial links to town centres and the main growth areas in London Riverside. However, TfL also needs to consider that where ambitious 'Healthy Streets' or 'Liveable Neighbourhood' schemes are proposed – particularly those where there is an emphasis on promoting walking and cycling, it may not be possible to secure improvements to bus journey times and in some cases these may worsen.

16) Improving rail services:

We welcome the commitment made by the Mayor in Policy 14 to transform the capital's rail-based services, particularly as a means to increase capacity to tackle crowding. However, many of the schemes outlined in the draft MTS are not 'new' and it is likely further enhancements will be required beyond what is already committed or under development as London's population increases. For example, planned capacity improvements on the Barking-Gospel Oak and Hammersmith & City and District lines will help alleviate some of the current problems with overcrowding on rail services in Barking and Dagenham, but with the local population expected to increase by 24% by 2030, additional capacity improvements will quickly be needed. We consider that this can be achieved, in part, through freeing up rail paths on the Barking-Gospel Oak and C2C lines for additional passenger services (this will require the upgrade of rail freight routes outside London so that non-London freight can be taken around the capital – as per Proposal 64); and through persuading the concept of a 'Digital Railway' to enable trains to run more closely together. The last two years has seen C2C services withdrawn from Barking as demand for them increases. This is clearly unacceptable and the wrong response to planning for growth. As a result, despite the commitment to a train stopping every three minutes at Barking in the AM peak, fewer C2C services now stop at Barking than under the old franchise. For this reason we support the Mayor's ambition to take over the running of suburban rail services so that the needs of Londoners come before the needs of those commuting from further afield.

To complement line capacity enhancements and improve the overall public transport journey experience, improvements to and the longer-term redevelopment of key borough transport interchanges, including stations at Barking, Dagenham Heathway, Dagenham East, Becontree and Dagenham Dock will be required – principally to address issues of overcrowding and poor access, but also to support future growth in the borough. We therefore welcome the inclusion of Proposal 67 in the draft MTS, but

this should be more explicit in stating the stations requiring improvements and the timescales for these.

17) Delivering a well-connected public transport system:

The Council strongly supports the introduction of river passenger services from Barking Riverside (Proposal 69) to the key employment hubs of Canary Wharf and central London. We consider this should be implemented before the opening of the Barking Riverside Overground extension in 2021 as a means of relieving pressure on existing ELT services.

We support the commitment in Policy 15 to make better use of the River Thames for freight. However, the scope of the policy should be widened to encompass other waterways that have potential to act as freight channels – for example the River Roding.

We also support the commitment in Policy 17 to develop transport services to support London's night-time economy. We are particularly keen to work with TfL to secure the extension of Night Tube services to Barking and Dagenham as soon as the District and Hammersmith & City line improvements are completed, and to deliver further enhancements to night bus services to those areas of the borough not directly served by the Underground network.

18) Delivering new homes and jobs through 'good growth':

The Council supports the Mayor's commitment in Policy 19 to ensure that new homes and jobs in London are delivered in line with the transport principles of 'good growth' – particularly where this would encourage walking, cycling and the use of public transport and minimise the use of the car. We particularly welcome the move to embed active travel in new development and the need for developers to plan to deliver improvements against the 10 Health Streets Indicators (Proposal 76). However, given the particular health challenges facing many Londoners, we would like this to go much further and for all new strategic developments to adopt the 10 'Healthy New Town Principles' as are being to the Barking Riverside Development.

19) Using transport to support and direct good growth:

The provision of new transport infrastructure and services will be critical to unlock the growth potential in underdeveloped parts of the city such as London Riverside. New bus routes and services in particular are recognised as a relatively quick and cheap way of kick-starting new developments. As such, we support the commitment in Proposal 86 to pilot bus transit networks in Outer London Opportunity Areas with the aim of bringing forward development, ahead of the delivery of more comprehensive, rail-based transport infrastructure improvements. As stated above, we are particularly keen to work with TfL to explore the potential for a north-south and east-west transit system connecting the key town centres and growth areas in London Riverside.

The Council considers that the quantum of new development proposed in the borough and across the wider London Riverside area can only be delivered with sustained investment in new rail infrastructure and services. To that end, we wish to work with

the Mayor, TfL, transport operators and other key stakeholders to develop and deliver the following improvements:

- The provision of a station at Castle Green on the recently approved London Overground Extension, to support the delivery of over 15,000 new homes in the area;
- A direct rail connection from Barking to Stratford to enhance connectivity to this important sub-regional hub and to maximise the growth potential of the borough and the economic regeneration potential of Barking town centre;
- A new mainline rail stop at Dagenham East station to bolster the ambitious plans for London East-UK, including the planned development of film studios;
- Improvements to and the longer-term redevelopment of Barking Station to address issues of overcrowding, poor access and to support future growth. Similar improvements are also required at Dagenham Heathway, Dagenham East, Becontree and Dagenham Dock stations;
- Exploring the potential for a future HS1/HS2 interchange at Barking Station to provide improved links between east London and the rest of the UK and Europe and to stimulate growth in the wider Thames Gateway area.

We support the inclusion of Proposal 88 which seeks to increase the number and capacity of public transport links across the Thames as a means of helping bring people together and improving access to employment and opportunities. A future onwards extension of the Barking-Gospel Oak line to Abbey Wood to link to Crossrail services is a key priority for the Council in this respect. In terms of further river crossings (Proposal 89), our priorities are for a Lower River Roding crossing linking Barking Riverside with Beckton in Newham with provision for a DLR/tram/bus transit/bus link to Gallions Reach/Royal Docks; and an Upper River Roding crossing between Abbey Road and Quay Road/Freshwater Road in Barking Town Centre as a precursor to establishing a new DLR/tram/bus transit/bus corridor linking Barking with Gallions Reach and the Royal Docks – both as a means of supporting the development of new homes/jobs in these areas.

Whilst broadly supportive of the principles set out in Proposal 90 in determining the appropriateness of further road crossings in east London, we are concerned that the issue is being pushed firmly into the long-grass as any options will not be considered until after the completion of the Silvertown Tunnel, the Lower Thames Crossing and the DLR extension to Thamesmead. This may limit the potential for growth in some parts of east London.

The Council strongly supports Proposal 93 which would see the relocation of a 1.3km stretch of the A13 in Barking and Dagenham into a tunnel and would deliver significant improvements to traffic flow and air quality, would reduce severance and unlock land at Castle Green for redevelopment – including the potential for 15,000 new homes.

20) Heathrow expansion:

The Council supports the Mayor's view, as set out in Policy 20, that any expansion of Heathrow airport must be able to demonstrate that it would not result in any additional

noise or worsening of air quality and how the surface access networks will be invested in to accommodate the resultant additional demand.

21) Responding to changing technology:

The Council broadly supports the principles set out in Policy 21 for assessing the role of new technology in the transport network in London. However, we consider that further emphasis should be placed on safety (particularly with regard to the deployment of autonomous vehicles) and that more coherent guidance relating to the specific role of different forms of car-sharing is required - which specifically advocates that such measures should not be a replacement for journeys currently undertaken by walking, cycling and public transport.

22) Funding London's transport system:

The Council recognises the need for new ways of funding the upkeep and development of the transport network in London, particular given the unprecedented levels of growth anticipated in the capital and the continued reduction in central government funding. We broadly support the Mayor's efforts to secure the devolution of a range of powers which could help fund these improvements (Policy 22), but there is also a need for powers to be devolved to boroughs, to address local priorities. In this regard the annual Local Implementation Plan funding is very important in allowing the borough to fund improvements to its local transport infrastructure. The formula for allocating this funding needs to be revisited so it properly takes into account growth and population change.

23) The role of the boroughs and the Mayor:

As the owner and operator of the majority of the road network in the borough, the Council recognises it has a significant role to play in helping to deliver the Mayor's transport ambitions and priorities (our overarching approach to addressing these will be set out in our next Local Implementation Plan). However, it should also be recognised that the role played by others, including transport operators, businesses and local communities is equally vital, and without adequate funding and support from TfL to actively engage with these important stakeholders, it is unlikely the Mayor's vision to create a future London that is home to more people and a better place for all to live in will be realised.

24) Other comments

The draft MTS identifies that the cost of delivering the schemes identified will require an average capital investment by TfL and others of around £3.3bn a year. We support the Mayor in calling for the devolution of the proposed funding mechanisms – such as additional taxes and powers (e.g. Vehicle Excise Duty), without which many of the proposals will be hard to implement.

We trust you find the above comments helpful. The Council looks forward to working with TfL and the GLA over the coming months to ensure that the issues we have highlighted here are addressed in the final version of the Mayor's Transport Strategy.

Yours sincerely

**One borough; one community;
London's growth opportunity**