



Response to TfL's "Developing a Sub-regional Transport Plan: Interim Report on Challenges and Opportunities" March 2010

This Note sets out West London Partnership and Westrans comments on the Interim Report.

It is difficult to respond to this document without first asking and receiving answers to some questions:

- what is the content of the delivered West London Sub- Regional (WLSR) Transport Plan
- how will this Plan be used; that is what is the purpose of the Plan, what policy and investment outcomes are expected from the Plan and what is the Status of the Plan
- what is the process for preparing and endorsing the content of the Plan
- what is the approach to prioritising the further work and analysis required to assess individual growth locations
- at what stages during the process is input required from WLSR Partnership and what is the form of this input
- how will the Plan read across to other strategic TfL documents and to Borough LIPs and LDFs
- what role do DfT and Network Rail and neighbouring authorities have in the preparation and endorsement of the Plan.

It may be appropriate for the document to include all those activities that are now undertaken or are planned to be undertaken at a Sub-Regional level such as Travel Planning, Freight Quality Partnership, London Cycle Network and London Bus Priority Network. The Plan could reflect collaborative working with neighbouring London boroughs and with neighbouring external transport authorities such as Surrey CC, Hertfordshire CC and Slough UA as well as SEEDA.

The Plan is to "show how the MTS will be implemented within the region" (Ref. Executive Summary page ii). The Plan could show how each Challenge and Outcome (ref. page 2 Figure 1) in the MTS, that is the second MTS (2010), is to be implemented either explicitly or by noting that a particular challenge or outcome is already satisfactorily covered by MTS (with appropriate references to text in the MTS) or will be covered in Borough LIPs.

The Plan could also form the basis for funding bids to central Government and for preparing a WLSR Transport Investment Plan for prioritising the spending of Community Infrastructure Levy funds. This is not described in the document. West



London considers that the WLSR Transport Plan should be embedded into the TfL Business Planning process.

There are some corrections needed in the document such as consistently referring to West London rather than Central London (for example refer to para. 2) and to Unitary Authorities rather than Buckinghamshire (refer to Plan E4). Plan E4 (and Figure 86) could more usefully identify West London's Hub and Spoke Network as recommended by the Outer London Commission and as drafted by WLSR Partnership. Figures 86 and 87 merit further discussion with the WLSR Partnership; the Partnership has supplied its views on connectivity challenges. Figure 90 was not included in the copy distributed.

We can fully agree with the remark on cycling in para 187 that "further investment should be targeted at trips internal to West London."

It may be appropriate to reconsider the comment in the final sentence of para 234 as it appears to be inconsistent with the objective of the Plan stated to be to "show how the MTS will be implemented within the region". We note that all of the five challenges that the document marks for use in the West London Plan are also relevant across other sub-regions and boroughs.

There may be further specific comments from individual Boroughs on the document; some additional general comments are:

- further analysis using Borough survey data and models is possible
- some improvements set out on page iv are now potentially under threat of being cut
- there is a need to include the impacts of major planning applications such as Southall Gas Works and Arcadia
- the role of key interchanges, such as Ealing Broadway, is underplayed
- opportunities are not just schemes; they should include policy changes, new strategies and joined up thinking between Boroughs
- the "further work and analysis" sub-sections for schemes in Chapter 3 are too light and general
- the "improving air quality" section is too heavily focussed on Heathrow

Our Comments on the key questions on page 138 of the document are:

- Useful aspects... the Evidence base included in Chapter 2 is useful
- Less useful aspects... the lack of clarity over the purpose and use of the Plan
- Local concerns... the document does not refer to the concerns detailed in the WLSR Partnership's 10-point Plan



- Gaps... the document does not clearly show how the MTS will be implemented in the region or take the reader from the MTS challenges to the WLSR challenges; the latter do not cover the MTS challenges and outcomes and are to an extent internally overlapping (e.g. orbital and radial connectivity are both important in improving access to key locations).
- Analysis... the document describes further analysis intended. We expect that a key element of work in the preparation of the Plan will be to use the West London Transport Model to identify future sub-regional challenges and then subsequently to test sub-regional options.
- MTS translation... the Plan could show how each MTS Challenge and Outcome (ref. page 2 Figure 1) is to be implemented either explicitly or by noting that a particular challenge or outcome is already satisfactorily covered by MTS (with appropriate references to text in the MTS) or will be covered in Borough LIPs.
- Cross-boundary working... the document provides some useful evidence on issues but does not include collaborative working with neighbouring authorities and so we would not expect it to cover issues comprehensively. When considering cross-boundary working, DaSTS goals and study outputs are important.
- Revision... this depends on the purpose and use of the Plan; it may be advantageous to delay the initial version of the Plan until after using the West London Transport Model to identify sub-regional challenges in order to avoid conflicting conclusions on what are the future challenges in West London.
- Ambition... including WLSR ambitions would give the document a clear sub-regional character and ensure that MTS goals, challenges and outcomes are translated into actions that achieved those ambitions.