1 Introduction

1.1 Transport for London (TfL) issued its publication “Transport 2025: Transport challenges for a growing city” at a seminar held on 23 June 2006. Whilst not a formal consultation document, TfL invited comments and feedback to be submitted by 8 September 2006. This document represents the response from the West London Strategic Transport Group (WL STG), representing many of the major transport stakeholders in West London (see Appendix for membership and brief history of WL STG).

2 Overview of the response

2.1 This response is arranged in five main sections.

2.2 First, we set out our reaction to the publication of the document and, in the context of the Government’s forthcoming Spending Review (SR2007), suggest that deployment of the arguments used in this response might help strengthen the Mayor’s case for greater investment in London’s transport system.

2.3 Second, we give our response to each of the three principal chapters of the document – on growth, options & challenges and policy options. In each case we review the analysis undertaken and discuss its particular relevance to the circumstances of West London. Here we also set out our proposals for further collaborative investigation and some alternative ways in which these issues might be addressed.

2.4 Finally, we bring together these comments in a summary of the key responses and proposals.

3 Publication of “Transport 2025”

3.1 WL STG welcomes the publication of Transport 2025 (T2025) as a fresh look at the longer range challenges facing transport in London. We support the idea of publishing this background document that introduces the analysis, ideas and options that TfL feel will shape transport policies and their practical implementation as schemes and services over the next decades. We particularly welcome two comments. First, in the Commissioner’s Foreword it is made clear that a dialogue with key stakeholders is anticipated and we look forward to those discussions. Second, at the very end of the document it is indicated that there will be the “development of a preferred set of options for different areas of London”. This commitment is reassuring since one of our principal concerns is that the document does not fully recognise the particular requirements of West London with its strong economy and vibrant communities.

3.2 The publication is timely in the lead up to the Government Spending Review of 2007. We believe that West London, with an economy larger than Frankfurt and a population as large as the combined population of the cities of Birmingham and Manchester, can add considerable weight to the justification for significant resource to be expended on transport in London. We believe that the arguments we put forward will help to strengthen the Mayor’s advocacy of London’s case.
4   London’s Growth

4.1 Chapter 2 of T2025 is entitled “The value and prospects for London’s growth” and sets out the value of the London economy and the projected growth in employment, housing and population. It goes on to note the connections between transport and both social exclusion and the environment.

4.2 Our first concern about the document is the approach which places greatest emphasis on dealing with growth. In West London we face a range of transport problems that are increasing in intensity, even without taking into account further new developments. We believe that this document should look at the totality of demand for travel in London and consider the investment needs arising from this overall picture, regardless of the different components and sources of that travel demand.

4.3 Second, the chapter is predominantly focussed on London’s central area, the financial and business services sector and the benefits of agglomeration. We recognise and support the arguments for London to maintain its World City status. The document’s conclusions are that greater agglomeration is necessary and that this will require increased transport capacity to move even larger numbers of people into and out of the central area during peak periods.

4.4 However, a strategy that relies too heavily on a single concept can be risky. We believe that West London provides an example of a different model of economic success with a more distributed economy. West London is a buoyant economy which attracts investment and where employment and population growth continues to occur organically, in response to changing market conditions and without external direction. If it were located anywhere else in the country, West London would be closely monitored and nurtured as a best practice case study of economic development. But located alongside the extraordinary economy of central London, West London can all too easily be marginalised. We seek to be recognised and given the policy, strategic attention and investment that our scale and importance merit.

The six Boroughs that make up West London are home to 1.4 million people and an economy of some £27 billion per annum. It has the world’s busiest international airport at Heathrow, 67,000 businesses, 750,000 jobs and Europe’s biggest industrial park at Park Royal.

Heathrow handles 68 million passengers per annum, employs 68,000 people and contributes £5 billion to the UK economy. The new fifth terminal will have the capacity to handle 30 million passengers per annum. The new national stadium at Wembley is an iconic landmark building on a worldwide brand name. It is also the focus of an extensive regeneration programme to create job opportunities for local people, building on the transport connections. Park Royal is home to 2,000 businesses, 40% of which are ethnic minority owned. Over the next ten years it aims to generate 25,000 new jobs, mainly for local people. Major regeneration and development is also taking place at White City and, just outside West London, at Cricklewood.

4.5 The West London economy encompasses a wide range of economic sectors, including technology, transport, and creative industries as well as the service sector. It is also widely dispersed geographically across the sub-region. We therefore face a different range of transport problems from central London in supporting our economy, including a lack of high capacity orbital routes and low public transport accessibility in outer London (see Figure below – Source: TfL)
4.6 Two particular arguments need to be mentioned at this point. First, the proposed transport investment to serve the central area reflects a belief that employment will increase in the centre. But this is, in part, a self-fulfilling prophecy. The market will inevitably exert its influence. Locations which are well served by transport facilities become attractive locations in which to site new enterprises, to do business and attract customers. Thus “unplanned”, or perhaps more accurately, “undirected” growth, may choose to locate in those accessible places, following transport investment. Hence the transport investment in part creates the need for transport investment. The second, opposite, effect means that areas not receiving investment become less attractive as places to do business. Transport investment in West London would help to attract new businesses and accommodate business expansion. It would also avoid the “tipping point” trend of worsening transport and environmental conditions discouraging further investment in the
sub-region, the consequent loss of competitive advantage over time and a risk of failure to make an effective contribution to London’s and the nation’s growth of wealth and prosperity.

4.7 We therefore believe that the long-term strategy to address London’s transport needs must pay greater attention to the need to maintain the economic success of West London through improving transport capacity, particularly for orbital journeys; increasing interchange opportunities and by providing greater coherence, clarity and comprehension of the public transport network. Some specific proposals that we would like to see considered are set out later in this response.

4.8 Although focussed on central London, the document does discuss future employment growth outside central London and the Thames Gateway, with nearly all of the identified sites (Heathrow, Cricklewood/Brent Cross, Park Royal and White City) lying within or adjacent to West London. The document says that town centres and these development locations “must be supported with adequate transport systems” (Section 2.2.1 page 20). These proposals must be developed in collaboration with the communities they are designed to serve and we therefore look forward to working closely with TfL on the capacity, nature, design and delivery of such systems.

4.9 Two of these locations (Heathrow and Cricklewood / Brent Cross) are also identified as sites for significant housing development with at least a further 10,000 homes planned in each location. Clearly, adequate transport systems are required to meet the demands of these concentrations of new homes, too. Again, further engagement with TfL on the scope and nature of such services is eagerly awaited.

4.10 At the end of section 2.2.2 reference is made to “sustainable transport expansion in the suburbs and town centres”. Whilst recognising the need for brevity of expression, West London does not fit easily into such a characterisation. West London contains many employment and industrial locations and has a complexity of travel patterns that does not only relate to central London and suburban town centres. Indeed the subsequent sentence of T2025 refers to the need to address the international movements of people and freight and pressures on airport access. West London is not only home to Heathrow, with Terminal 5 opening soon, but also to a large number of freight facilities in consequence of its proximity to the national rail and road networks. The requirements for freight transport arise from West London’s strong mixed economy but are given limited attention in T2025. We believe that greater explicit recognition of the economic and industrial context must be included as the transport plans for London are elaborated at the sub-regional level. West London’s own efforts to address freight transport issues are being developed through the West London Freight Quality Partnership (see later and www.westlondonfqp.com).

4.11 Section 2.3 outlines the importance of addressing the transport needs of London’s diverse communities for reasons not only of social justice, but also to maintain economic success. West London has a particular advantage in its combination of ethnic diversity and enterprise culture. But the transport network does not at present offer the accessibility to jobs, education, healthcare and everyday facilities that are needed to maintain and improve the local offer. We wish to help business develop by providing the availability of labour, sites for expansion and a communications network that secures a good environment in which to both live and work. Only in this way will business expansion be secured and retained in West London. Worklessness is a major issue for West London’s communities. With the Government, GLA/LDA and businesses, the WLA and West London Partnership are participating in a City Strategy Pilot (West London Working) to increase employment rates. Research shows that high concentrations of those not in
work reside in close proximity to significant concentrations of employment. Tackling the local transport barriers to these communities accessing nearby employment and training opportunities will be important to the success of the Pilot and to achieving the partner’s objectives.

4.12 West London supports the aim to transform London into an exemplary sustainable world city, improving both the local environment and reducing London’s environmental footprint. For example the West London Alliance Air Quality Cluster Group has already produced its own guide to assessing traffic and air quality impacts (see later for further details).

5 Transport objectives and challenges

5.1 This chapter of T2025 is divided into three sections tackling sustainable economic development, social inclusion and climate change & environmental considerations.

5.2 Sustainable Economic Development: We believe that the West London model provides an opportunity to build an economic base consistent with the principles of sustainable development. The geography of jobs in London shows a large number of jobs in West London but with many different centres of employment, including Heathrow (see Figure below - source: Our London, Our Future, GLA Economics, November 2005, page 51). Already, West London has less than the average proportion of commuters to central London. For example 62% of the workforce is resident in the sub-region and 61% of the employed residents work there. Overall 72% of trips are internal within the sub-region. (Source: TfL presentation on Draft Network Plan for West London, March 2006). Residents working close to home rather than travelling further to work in central London is in principle a more sustainable arrangement. Shorter trip lengths should help to reduce energy use and address the climate change imperative, provided these trips are undertaken by sustainable modes of transport.

5.3 Particularly in the south-western part of the sub-region, less than 5% of work trips are to central London. (Source: as above). Clearly many residents are employed within the sub-region, but many are also reverse commuting to locations outside the London boundary. The economic strength of the Thames Valley corridor means that this is a significant opportunity for many and has the attraction of avoiding the worst excesses of the daily commute. However, the disadvantage is that many of these commuter trips in the outer parts of West London are by car. Indeed West London has lower than average London figures for mode split by public transport (16-21% compared to 24-25% for London as a whole – Source: as above). But only if there are moves to support more sustainable transport use and provide better accessibility to public transport services will this issue be addressed.
5.4 We agree with T2025 that travel demand has not only grown in scale, but also in complexity as
work has become a lesser proportion of total travel and destinations for other journey purposes
become more varied and more widely scattered as a result of preferences and lifestyle choices.
The capacity expansions proposed (e.g. 26% on the underground) will mostly concentrate further
the capacity on radial systems. Whilst recognising the problems of overcrowding, we believe that
transport provision also leads the markets for employment and home locations. Further radial
capacity will not encourage the more sustainable pattern of local living and working in close
proximity. We believe that a greater proportion of investment in new capacity should be in local
and orbital services to support the sub-regions’ economy. We believe that without significant
further expansion in public transport serving the distributed homes and workplaces in West
London, even greater numbers of people will be forced to use private car, exacerbating existing
high levels of traffic congestion and worsening the environmental conditions for residents,
workers and visitors.

5.5 We want the increases in transport capacity to be targeted at addressing local needs. For
example, many industrial, healthcare and airport related jobs operate on a near 24 hour basis
and public transport services during evenings and night time do not offer the desired accessibility or security. As an indication of the implications of this, Northwick Park and Clementine Hospitals in West London already have the expense of commissioning private minibus services to transport staff working anti-social hours.

5.6 Overall the more widespread distribution of homes and workplaces found in West London could lead to shorter journeys, less energy use and more sustainable transport patterns and lifestyles. Long-distance commuting is not very sustainable. Encouraging reverse commuting helps to fill the spare space on existing transport systems before requiring additional capacity. We are concerned that TfL plans appear to encourage more West Londoners to commute to jobs in central London. This is likely to have detrimental effects on the economic and social welfare of the sub-region as a greater proportion of better off people will be spending more of their time and money in central London and rather less in their home communities.

5.7 We would also have concerns if the planned capacity increases on rail systems are achieved by means of reducing seating and increasing the proportion of standing passengers.

5.8 We note that “buses are the principal means of transport in the suburbs” (page 37) and by implication or omission, this is interpreted to be most of outer London. We agree that further services and more capacity on buses will be needed and that the effect of several decades of bus investment has been to “stave off the worst effects of congestion”. But from this we draw a rather different conclusion: that a public transport network of higher specification and capacity must be created, serving the principal centres of activity.

5.9 We agree that walking and cycling are important for short distance trips and their use should be encouraged, in part on grounds of creating more healthy and active lifestyles.

5.10 The section of this chapter on “Managing traffic congestion” provides many interesting statistics and we concur with the broad aim of stabilising traffic demand to its current levels. We note that TfL work concludes that “traffic levels overall have been stable on the strategic network over the past five years”. This does not accord with our experience in West London and we would like the opportunity to study and investigate the specific circumstances of West London traffic congestion in greater detail with TfL analysts.

5.11 We support the aim of “developing a balanced approach in managing the differing roles of streets as transport corridors and public and community spaces”. Indeed this underpins the concerns of West London Boroughs about displacement of traffic from main arteries to local residential streets. We recognise and support the aim of creating a better quality public realm. We also share the concern about how best to constrain traffic while maintaining a vibrant and successful economy.

5.12 **Improving Social Inclusion**: We support the principles of addressing social exclusion to ensure the stability and success of London’s economy and communities. We agree that transport services should be as accessible as possible by tackling the barriers to more widespread use of public transport. We concur with the need to improve physical accessibility, to make public transport affordable and to utilise planning to ensure that large activity generators are located close to public transport nodes. We support improvements to both safety management and personal security, including reducing the fear and apprehension, whether justified or not, of encountering crime and other anti-social behaviour when travelling.
5.13 However, we note that the high expense of major infrastructure improvements to serve central London commuters will favour central London workers who are generally better off and who are frequently longer distance commuters. The analysis of transport accessibility and equity should not be constrained to the reporting of selective remedial actions addressing particular groups or issues, but should be an integrated part of fundamental analysis and planning of transport facilities. We therefore propose that TfL should re-examine the sustainability impacts of T2025 plans to increase commuting, including the environmental, economic and social consequences and their distribution among different groups and communities.

5.14 **Tackling climate change and improving the environment:** The final section of Chapter Three of T2025 looks at reducing carbon emissions and other environmental impacts. We support the progress being made to reduce the adverse environmental effects of transport use in West London. The West London Alliance Air Quality Cluster Group has commissioned a best practice guide for the assessment of traffic and air quality impacts (TTR & Casella Stanger, Best Practice Guide for Assessment of Traffic & Air Quality Impacts, for West London Alliance Air Quality Cluster Group, August 2005) and we would be pleased to share this with TfL and other stakeholders who have the shared aim of improving London’s air quality.

5.15 We note the TfL design principle to create: “clear and easy to understand routes and spaces so that people can find their way around easily”. We strongly support this principle and would like to see it applied to greater effect in West London. We wish to see a public transport network presented with greater clarity and coherence, so that travel options can be more clearly understood, visualised and marketed. The relationship of main routes (rail, underground and bus) to the principal interchanges and town centres is not easily understood and it is difficult for visitors, as well as some residents, to find their way to different destinations. We would welcome the opportunity to work with TfL to establish a more effective publicity and marketing strategy designed specifically to meet the needs of West London.

6 **Policy options**

6.1 The final substantive chapter of T2025 considers the policy options for managing transport in London under three major headings: getting the best out of the existing system, travel demand management and new capacity.

6.2.1 **Getting the best out of the existing system:** In line with the principles of prudent stewardship, we support the general aim of improving transport effectiveness first, before significant new investment is undertaken. However, recognising the long lead times necessary in bringing forward transport investment proposals, we do wish to see early consideration given to the transport problems facing West London. We wish to ensure that a wide range of options are considered, including options for significant system investment not just local measures to alleviate the existing situation.

6.3 For example, we note the proposals to achieve underground capacity increases by PPP upgrades (page 59). The improvements for West London occur in 2014 (Piccadilly), 2018 (District) and 2020 (Bakerloo). We believe that earlier action on transport in West London is needed and that planning should be started as soon as possible to create the coherent, integrated network of transport systems across West London. In West London we support the development of Crossrail and look forward to Crossrail 2. We welcome the expansion and extension of services on the
North London and West London Lines. We support the development of Airtrack and the proposals for a Fastbus serving Park Royal. Our partners continue to generate further ideas to improve the effectiveness of transport in West London, including for example Harrow-Heathrow orbital route. We confirm our willingness and enthusiasm to work with TfL to analyse the medium and long term prospects for transport on a sub-regional basis and to help identify the longer-range plans necessary to secure the improvements required.

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<tr>
<th>Transport Proposals for West London</th>
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<tr>
<td>• Expansion and extension of proposals for North London Line and West London Line</td>
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<tr>
<td>• Fastbus scheme between Wembley and Park Royal</td>
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<tr>
<td>• Fastbus Plus – between Cricklewood/Brent Cross and Acton Main Line/Ealing Broadway would link 14 radial routes in an arc around north-west London and would facilitate the accessibility benefits of Crossrail and Thameslink projects to West London communities</td>
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<td>• Investment in exploring whether there is a business case for increased/new north east – south west tube capacity in West London, building on the outline case made by Symonds for West London Business</td>
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<td>• Interchange development at:</td>
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<td>Scrubs Lane / Crossrail</td>
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<td>First Central: Piccadilly &amp; Central Lines at Park Royal</td>
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<td>• Maintain / enhance stopping services on inner suburban lines of Great Western, Chiltern, Silverlink services</td>
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<td>• Travel Demand Management through car clubs, an enhanced London Cycle Network, cycle hire and taxi services at all stations, demand responsive community transport services, etc,</td>
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<td>• School Travel Planning</td>
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6.4 We note the commitment to improve public transport system quality and the comment that “the easier the system is to use, the more customers will be encouraged to use it.” (page 63) This accords with our desire to see better coherence and understanding of the public transport “offer” in West London, as set out in 5.15 above.

6.5.1 Managing the demand for travel: We recognise the options spelt out here and have considered these within a recent West London Strategic Transport Group workshop. We strongly support the application of “soft” Travel Demand Management (TDM) measures and indeed have been pioneers and enthusiastic adopters of a number of these initiatives including travel planning, freight quality partnerships and car clubs. Whatever the broader policy context, it seems to us that these measures are simple, prudent and effective means to help achieve better transport and environmental conditions within our area. West London is committed to making progress on these issues through its own actions, for example through the West London Freight Quality Partnership (see below).
6.6 We recognise that road user charging may be adopted at a national level and we look forward to ongoing debate on the policy, approach and practical implementation as details become apparent in due course.

6.7 **New Capacity**: As noted above, we believe that early consideration should be given to the requirement to produce a more strategic network of transport facilities in West London, better understood and more intensively marketed. We wish to work with TfL to develop and test some ideas and options for further capacity provision in West London. We are not convinced that the existing strategy, which focuses most of the capacity increases on existing radial corridors, will be effective at meeting the dispersed pattern of homes, workplaces and facilities and consequent travel patterns and demands in West London.

6.8 **Other Issues**: While recognising the strategic focus of the document, there is an apparent neglect of the smaller town centres and local shopping parades. What future does Transport 2025 hold for London's many smaller centres of community activity?

6.9 Finally, we appreciate the integration in this document of all modes within the TfL portfolio. However, at local level each mode is managed and often treated separately with different parts of TfL responsible for rail, underground, roads, buses, taxis, etc. We understand and welcome the work of TfL Borough Partnerships to help provide oversight across all modes. However, we wonder whether local and sub-regional service delivery might be aided by managerial arrangements reflecting customer needs for integrated transport, rather than the modal separation which currently applies. We recommend that TfL consider establishing working structures and practices that achieve greater practical integration between all modes and services.

**7 Summary and conclusions**

7.1 We welcome this publication and look forward to working closely with TfL to elaborate in more detail the practical proposals for improving transport in West London. (Para 3.1)
7.2 We believe that our arguments complement and strengthen those put forward by TfL and may assist in making the case for London in SR 2007. (Para 3.2)

7.3 We are concerned about the focus on growth and wish to see a more comprehensive approach considering all transport demands throughout London, whatever their cause. (Para 4.2)

7.4 We are concerned about undue reliance on a single model of London’s economy and its potential vulnerability to changes in business practice, technology and lifestyle preferences. We believe that the West London model of a distributed economy has considerable advantage in terms of a sustainable economy. (Paras 4.4 – 4.5)

7.5 We look forward to working closely with TfL on the nature of the transport improvements required to meet the needs of the planned growth sites in West London. (Paras 4.8 & 4.9)

7.6 We believe that greater explicit recognition of the economic and industrial context must be included as the transport plans for London are elaborated at the sub-regional level. (Para 4.10)

7.7 We believe that appropriate local transport improvements are necessary to secure and retain business expansion in West London. (Para 4.9)

7.8 We believe that a greater proportion of investment in new capacity should be in local and orbital services to support the sub-regions’ economy. We believe that without significant further expansion in public transport serving the distributed homes and workplaces in West London, even greater numbers of people will be forced to use private car, exacerbating existing high levels of traffic congestion and worsening the environmental conditions for residents, workers and visitors. (para 5.4)

7.9 We wish to work with TfL traffic analysts to understand the specific circumstances of traffic congestion in West London. (Para 5.10)

7.10 We note the actions to support socially excluded groups but wish to see a sustainability analysis, including consideration of the distribution of the costs and benefits, for investment in additional capacity to serve the central area. (Para 5.13)

7.11 We want the West London public transport network to be more coherent and comprehensible, enabling better understanding of the travel opportunities and thereby generating increased patronage. (Para 5.15)

7.12 We confirm our willingness and enthusiasm to work with TfL to analyse the medium and long term prospects for transport on a sub-regional basis and to help identify, test and appraise the longer-range proposals necessary to secure the improvements required. (Para 6.3)

7.13 We recommend that TfL consider establishing greater integration between modes in their working practices. (Para 6.9)
7.14 **Conclusions**: We believe that a balanced transport strategy must address the needs of all parts of London, helping to ensure a robust, flexible and sustainable pattern of work and lifestyles that will be able to adapt to changing economic and social priorities over the long term. We confirm our enthusiasm to work with TfL to gain a better understanding of the specific issues affecting West London and to help develop and test options for improvement in the transport network and its marketing. We believe that the case for West London will strengthen the arguments for London as Government conducts its spending review SR2007.

**We want TfL to:**

- Recognise and have regard to the economic success of West London in preparing its investment case for SR 2007.
- Work with the West London authorities to understand the nature, extent and causes of traffic congestion in West London.
- Undertake a comprehensive sustainability review of the proposals to increase radial capacity to central London, in particular considering the environmental and social effects and the distribution of costs and benefits among different groups and communities in London.
- Work with the West London Strategic Transport Group to identify, test and appraise options to address the transport needs of West London, including particularly proposals for improved orbital routes and interchanges and services tailored to meet the particular needs of local communities.
- Work with the West London authorities to develop better public understanding of the public transport network to improve its promotion and marketing.
- Consider developing working practices that provide greater integration between modes.

**West London Strategic Transport Group commits itself to:**

- Assisting the Mayor and TfL to promote the case for greater investment in transport in London as a part of SR2007.
- Working with TfL to understand the nature, extent and causes of traffic congestion in West London.
- Working with TfL to identify, test, develop and appraise options for improving transport in West London, particularly for orbital services and interchange.
- Working with TfL to create and market a more coherent approach to the public transport network in West London.
- Continuing to develop proposals and initiatives to address specific transport issues in West London, for example through travel planning and the West London Freight Quality Partnership.
APPENDIX

The West London Strategic Transport Group (WL STG) was set up by the West London Partnership to champion the transport needs of West London and consists of:

- West London Alliance – the Boroughs of Brent, Ealing, Hammersmith & Fulham, Harrow, Hounslow and Hillingdon
- Park Royal Partnership
- West London Network (of voluntary and community groups)
- North West London Strategic Health Authority
- West London Business – Chamber of Commerce members including:
  - BA
  - BAA Heathrow
  - Stockley Park
  - Brixton Estates

Meetings are attended by representatives of TFL Borough Partnerships and TFL Strategic Planning. The WL STG is grateful to TFL for the support provided for its work.

A West London Transport Strategy (WLTS) was first created in 1997 under the aegis of a West London Leadership initiative chaired by Peter Hendy. Modified and updated it has continued to be an underpinning of strategic development and implementation. The West London Alliance WLTS Officer group helps co-ordinate transport improvement schemes across the six Boroughs and is recognised as a Borough Partnership by TFL. The WLTS Group has helped the promotion and practical application of accessibility analysis, travel planning, freight quality partnerships and car clubs.