

The Mayor's Transport Strategy Response from ACE

Introduction

ACE is pleased to have the opportunity to respond to the public draft of the Mayor's Transport Strategy. In this document we have provided general feedback on the strategy, as well as commenting on selected specific proposals.

The comments have been formed from ongoing discussions with the ACE membership, including its specialist transport policy groups.

Summary

ACE agrees with the need to produce an overarching strategy for developing, maintaining and enhancing London's vital transport networks. We are pleased to see the Mayor take a "whole system" approach, demonstrating linkages between modes and considering behaviour change and modal shift as part of the strategy.

Given the economic situation, we are concerned about the affordability of this ambitious strategy. We would welcome further specific details about how the individual enhancements would be financed, and would encourage fresh approaches to securing private investment into the network.

ACE will provide whatever assistance it can to help turn this strategy into workable solutions for London's transport network.

1. Goals, challenges and outcomes

1.1 ACE welcomes the decision to develop an overarching strategy for improving transport in London. We believe that it is essential to have a long term vision for improving the capital's vital transport networks.

1.2 Taking a "whole system" approach to transport in London will help to bring consistency to the network, thereby improving the experience for all network users.

1.3 The headline goals are broadly sensible. ACE suggests that supporting economic growth and improving network resilience should be the highest priorities, although we recognise the need for a sensible balance between the needs of all transport network users.

1.4 ACE agrees with the core challenges identified in the strategy. Transport supports a wide range of economic, social and environmental objectives, and all need to be balanced.

1.5 The headline outcomes identified are sensible objectives for an efficient and reliable transport network. It would be sensible to give more weight to improving freight transport within London, both in terms of supporting economic growth and encouraging modal shift.

1.6 Many of the specific proposals seem very helpful in principle, and would contribute to an enhanced transport experience across London.

1.7 Improving the capacity, quality and reliability of existing assets is crucial. As well as investment in enhancements, this also requires a new approach to maintenance. A long term approach to asset maintenance would be extremely helpful in managing the risk of network failure. This would also give greater certainty to the engineering community who will be delivering this work.

1.8 Reference to other UK and international transport networks is also essential. This would help to maximise London's competitive advantage in the global economy. This will probably require close cooperation with local and regional authorities outside of London.

1.9 While maintaining and developing access to the Central Area Zone is important, many journeys are also made purely within outer zones, and between the outer zones and neighbouring localities. ACE recommends that outer zones are not marginalised in future transport developments.

1.10 The strategy should aim to build capacity for encouraging growth outside of the Central Area Zone. This would help to increase opportunity for all Londoners and relieve pressure on the central area, as well as providing more opportunities to encourage behaviour change and modal shift.

1.11 ACE is concerned about the affordability of these proposals. The current state of the public finances has impacted on transport investment across the UK. London has not been immune from this; concerns have been raised regarding the future of the Underground enhancement programme and new river crossings, amongst others.

1.12 The high profile failure of Metronet, along with the reported issues at Tube Lines, has undermined confidence in the public-private model that has been employed on the London Underground. In order to improve quality and efficiency, lessons should be learned from these experiences when appointing future contractors. Sound understanding of London's transport assets and the UK transport market should be major considerations in future appointments.

1.13 ACE would therefore welcome further detailed proposals about how the strategy will be paid for, and would suggest that creative ways of raising investment be explored. This could include issuing infrastructure gilts, as ACE has proposed. Section 8 of the draft strategy helpfully sets out some proposals.

1.15 ACE would also welcome more detailed indications from the Mayor regarding timescales and priorities for implementing these proposals. A sound, realistic vision for delivery will help to give certainty to residents, businesses and suppliers to the transport network.

2. Responses to specific proposals

2.1 ACE has opted to respond to a selection of proposals that best fits the interests and concerns of its member companies. In the following table, we have included our comments on the proposal along with an indication of the priority that could be sensibly placed on the proposal.

2.2 Where we have indicated a priority for a proposal, we refer to the following timescales:

- Immediate: implementation could begin in 2010
- Short term: 2010 – 2012
- Medium term: 2013 – 2020
- Long term: beyond 2020

2.3 In general, immediate improvements could be made to the way that network enhancements and maintenance are assessed and chosen. This could result in efficiency savings.

2.4 There are also some significant schemes, such as the Thames Gateway Bridge and the Croyley Rail Link, that are at a fairly advanced stage and could be progressed relatively quickly.

2.5 Where there are existing development plans (such as the Tube enhancement programme), these should be delivered on as far as possible. This will give much needed certainty to residents and businesses, and will allow transport network suppliers to plan their businesses more effectively.

Proposal	Comments	Suggested priority
1	Encouraging more international trains would be helpful, and may help to relieve pressure on airports. There may be an opportunity to encourage more competition on the high speed network, although this may require careful handling due to the regulatory process.	Short – medium term.
2	Additional rail freight terminals would help to provide meaningful capacity increases, but only if more train paths on main lines could be provided. This would probably be expensive in the short term. The Mayor should consider whether direct support could be provided to accelerate the London Gateway port development.	Medium - long term.
3	Relieving London of freight destined for other areas is a sensible step, and the Mayor should support these network developments. This may require new infrastructure that is unaffordable in the short term.	Medium term.
4	ACE welcomes the idea of a national high speed network. This is a long term aspiration.	Long term.
5	ACE supports Crossrail, but would be wary of diverting resources from the rest of the network to support the project.	Immediate (project is underway)
6	Future extensions of Crossrail would probably be expensive, and in the short term would draw funding away from vital enhancements to other parts of the network.	Medium – long term.
8	Further rail capacity on key routes would be welcome, but adding new track would be a long term aspiration. Redeveloping key stations (as per proposal 11) could provide quick wins. Introducing in-cab signalling may be more achievable.	Medium - long term.

Proposal	Comments	Suggested priority
9	A new south west – north east line would be welcome, if it can be afforded.	Long term.
11	Station enhancement could deliver welcome improvements relatively quickly, although the benefits would probably only be short term unless other enhancements or modal shift can be achieved.	Short term.
12	Better planning and management of engineering works is essential. Preventative maintenance should be aligned with resilience improvements. Transport for London could explore joint or coordinated maintenance programmes with Network Rail to limit disruption and pursue efficiency savings. ACE is ready and willing to work with Transport for London and Network Rail to explore how improvements can be achieved.	Immediate.
14	ACE agrees with the need for extra orbital capacity, but would question its affordability in the short term.	Medium term.
15	Further DLR extensions and enhancements may be welcome, but only if they are affordable.	Long term.
16	Extra Tramlink capacity would be welcome, if it could be afforded.	Medium - long term.
17	A phased programme of improvements to the Underground is welcome. As far as possible, Transport for London should deliver against the existing enhancement programme, and set out clearly its long term objectives.	Immediate.
18	The existing programme of Tube station refurbishments should be delivered on as far as possible, with a minimum of delay.	Immediate.

Proposal	Comments	Suggested priority
19	Further proposals for Tube station enhancements should be set out as soon as possible, giving indicative timescales for delivery. Our concerns regarding funding remain.	Short – medium term.
20	Cooling the Underground is a significant challenge, but an essential consideration given the forecast increase in passenger numbers. It also provides an opportunity to examine alternative energy supplies, particularly as air conditioned Underground stock is rolled out.	Medium term.
22	Longer term enhancements to the Underground would be welcome, if the necessary extra investment can be found. The Croxley Rail Link has been proposed for some time, and could probably be progressed relatively quickly.	Medium – long term.
30	The innovative use of technology has the potential to improve journey time predictability. Lessons should be learned from the Highways Agency’s managed motorways programme, to assess what could be adapted for London’s roads.	Medium term.
34	A systematic approach to prioritising road projects would be helpful and increase transparency. Care must be taken in choosing the right indicators and measures to ensure that worthy schemes are not ignored.	Short term.
35	A coordinated, rolling, long term programme of maintenance and enhancements is vital in order to manage network risks and whole life costs effectively. ACE suggests that a costed programme with indicative timescales is established as soon as possible and updated regularly.	Immediate.

Proposal	Comments	Suggested priority
38	Exploring further use of the river and canals for freight is a welcome suggestion, particularly in conjunction with the London Gateway port development.	Medium term.
39	A package of river crossings east of Tower Bridge would be helpful. ACE suggests that the proposed Thames Gateway Bridge should be included, as this scheme is at such a stage that it could be commenced relatively quickly. More clarity on timescales and funding sources would probably also be needed.	Medium – long term.
46	Addressing strategic interchanges could help to address network bottlenecks. ACE awaits further details about how this will be taken forward.	Short – medium term.
47	Uncertainty over the Heathrow situation, plus the BAA competition inquiry, has served to depress the airport engineering sector. Clarity on the favoured options for addressing airport capacity would be welcome, although we recognise that this is probably contingent on setting a detailed programme for other network enhancements.	Medium – long term.
49	Improved access to airports by public transport is essential for passengers and staff alike. ACE would support such enhancements where they represent good value for money.	Short term.
91	Steps to reduce transport emissions are laudable, but we would suggest that this proposal is enacted alongside efforts to encourage modal shift and behavioural change (e.g. proposal 95). This would help to maximise the potential benefits.	Medium term.

Proposal	Comments	Suggested priority
95	Behavioural shift and emissions reduction are potentially complementary; ACE would suggest that this proposal is considered alongside proposal 91.	Medium term.
96	Integration of transport modes is an important step towards encouraging modal shift and behavioural change. A fully integrated fare system (as per proposal 121) will support this.	Short – medium term.
98	Reform of planning regulations is an essential step to encouraging more sustainable developments. As well as reviewing planning conditions, ACE suggests that the planning approvals system be reformed at the London borough level. This could include streamlined approvals hearings and more technical training for planning officers in assessing sustainable transport solutions.	Short – medium
100	ACE welcomes the intention to support research and development in aviation carbon efficiency, and awaits firm details of how this will be done.	Short – medium term.
101	Smoothing road journey flows may have the double benefit of reducing emissions and improving journey time reliability. This could probably be implemented relatively quickly, for comparatively little cost.	Short term.
104	Delivering the infrastructure for electric cars is essential to enable mass market uptake. It may be worth exploring whether local authorities on the London fringe could also contribute, to facilitate journeys across the suburbs.	Medium term.

Proposal	Comments	Suggested priority
105	Implementing energy-efficient electrical infrastructure across the railways could be done as part of ongoing renewal works, reflecting Network Rail's new operating structure. Finding additional funding may be the key constraint.	Short – medium term.
106	Assuming that there is a benefits-to-cost case for small scale electricity generation, this should be explored. The current national focus appears to be on central generation and strengthened distribution networks; implementing microgeneration may not be an urgent priority.	Medium term.
108	It is sensible to keep road charging options under review, although road charging needs to be balanced against the financial impact on residents and businesses, the cost of infrastructure required, and the likely efficacy at inducing behaviour change compared with other possible means. Different parts of London may require different approaches to achieve modal shift.	Short – medium term.
109, 110, 111, 113	<p>ACE suggests that resilience to climate effects should be part of the design, usage and maintenance strategies of all infrastructure assets. It should be a material consideration at all stages of the asset lifecycle. Best practice principles should be learned from and implemented across the board, taking a “whole system” approach to resilience.</p> <p>There needs to be a balance between the added cost of resilience and the likely impact of adverse weather. The work of the UK Climate Impact Programme should be taken into account as part of this process.</p>	Immediate

3. Other issues of relevance

3.1 Investment. The strategy sets out an ambitious programme of works which, if delivered, would likely be a major boost to transport in the capital. However, the cost of delivery may be very high. In order to ensure value for money and management of expectations, the strategy should be clear about how the necessary investment for each scheme will be secured.

3.2 Procurement. Addressing efficiencies in public procurement is essential if the strategy is to deliver value for money. The strategy should take into account issues raised through procurement of major transport developments in the past, and ensure that there is a clear vision of how the strategy will be delivered, although detail issues (such as contractual terms) will be a matter for the delivery agencies.

A “whole system” approach to transport planning should be supported by a “whole system” approach to procurement. Transport for London’s current framework agreement is a positive example of how to coordinate procurement across multiple authorities, with potential savings and sharing of expertise. The Mayor should provide full support for this initiative.

3.3 Planning. Although covered in the strategy to a certain degree, obtaining planning permission may be a complex and time-consuming step. National efforts to streamline planning may be helpful, and lessons can be learned from the successful delivery of the Olympic Park, Crossrail and the ongoing development of the Tideway Tunnels. The strategy should aim to give confidence to residents, businesses and London boroughs so that the risk of lengthy planning disputes can be mitigated.

ACE recommends that the core principles of the Infrastructure Planning Commission are integrated into local planning consent procedures. This will help to balance the need for efficient planning processes with the need for buy-in at the local level, and will accelerate much-needed enhancements.

3.4 Skills. Where major developments are concerned, there is a potential for overlap in demand for skills. An example is the demand for tunnelling expertise for Crossrail and the Tideway Tunnels. In this case, this is being resolved by establishing a tunnelling academy. The transport strategy should take into account the likely availability of skills to deliver, and any additional skills needs.

A coordinated approach to procurement and planning consents will also help to reduce the risk of conflicting demand between projects.

4. About ACE

ACE is a not-for-profit organisation that represents the business interests of the UK's consultancy and engineering industry. It is comprised of approximately 800 member companies that collectively employ more than 100,000 people across the UK. London-based businesses comprise almost one quarter of all ACE member companies.

5. Further information

ACE would be pleased to discuss any of the points raised in this submission further. Please contact:

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