

## **CHAPTER 1 – THE CHALLENGE**

***1) London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.***

***– Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.***

As an outer London Borough the council recognises many of the challenges highlighted in the chapter. However, the council considers that in the recent years it has risen to these challenges, and will play a full role in meeting these challenges in years to come.

Using the London Plan Annual Monitoring Reports from 2010-11 to 2014-15, of the ten boroughs which exceeded their London Plan housing targets, only Hillingdon and Hounslow delivered more housing units above their target than Sutton, which delivered 723 housing units over target. This historic over-delivery, along with the council's future growth targets outlined within our draft Local Plan and detailed in the covering letter, should be taken into account when Transport for London is considering infrastructure interventions.

The lack of any Underground and Overground lines in the borough, a limited network of largely low frequency buses and a rail network with irregular timetabling means that existing public transport can be overcrowded, and as such only 16% of trips are made in this way.

Past growth and the growth envisaged in the draft Local Plan need to be supported by public transport interventions but, as noted in the covering letter above, the ability of developers to "net off" floorspace means that the levels of developer contributions or CIL are unlikely to be sufficient to make large scale transport improvements in the borough, and so the council would be reliant on TfL and/or DfT/Network Rail to bring forward schemes. This means that regional and national support, both practical and financial for Tramlink extensions to Sutton and the London Cancer Hub, Crossrail 2 to Worcester Park station and Metroisation (from West Croydon to Belmont, and the Mitcham Junction line via Hackbridge to Cheam) are essential.

Sutton also faces the challenges of interfacing with county and district councils outside London, and this can cause difficulties when considering development which has the potential to increase traffic movements. One such example is the London Cancer Hub proposal, where neighbouring non-London authorities are concerned at the impact of car traffic on their own roads. It is vital going forward that developments such as the Cancer Hub are supported by significant public transport investment, and the development is made in such a way to deter car use. Crucially we will require the support of TfL to explore further innovative funding mechanisms to fund this required infrastructure, including the potential for a Growth Zone.

## **CHAPTER 2 – THE VISION**

**2) The Mayor's vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80% of Londoners' trips will be made on foot, by cycle or using public transport.**

**– To what extent do you support or oppose this proposed vision and its central aim?**

This is a challenging target. At present in Sutton the total is 46%, comprising 28% foot, 2% cycling and 16% by public transport. The long term target in the draft Local Plan is to increase this to 56% by 2025.

80% of the borough's population live in areas with PTAL of 0-2. Although 95% of the urban area falls within 400m of a bus service, many of these are only a single low frequency service, with lack of services at weekends and in the evenings. 77% of households have access to at least one car or van, with a number of multiple car households, made up of families with children, older residents who are less likely to use bus passes, and a large number of adult children living with parents due to the high cost of home ownership in the area.

The reduction in TfL grant funding means that as boroughs we are unlikely to see any increased or additional bus services in the short term, and we await proposals for outer London boroughs to benefit from savings made within central London, as promised by the Mayor in 'A City for All Londoners' in 2016. In discussions with TfL, the council understands that any new routes, or expansion of existing services, would need to demonstrate a high potential rate of return and be off-set by savings from elsewhere on the network, or that a stream of developer funding would be required.

The council notes that the introduction of Tramlink to Croydon resulted in a 20% modal switch from car to tram. Given that Croydon town centre is better served in train and bus terms than Sutton town centre the modal switch could be just as, or even more, dramatic for Sutton. This should not however be made at the expense of bus and other services in the borough due to the existing low levels of service.

In summary, the council questions whether the proposed target is achievable without significant infrastructure development in areas of persistent high growth.

**3). To support this vision, the strategy proposes to pursue the following further aims:**

- **by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day:**

The council supports this target for those that are mobile enough to do so. As the number of trips on foot or by cycle makes up about a third of all trips in the borough, there is considerable scope to increase these figures, especially given the short nature of many local trips, providing the right conditions can be created.

The borough's Sustainable Transport Strategy and Cycling Delivery Strategy include proposals for building on the existing network of footpaths and cycle-friendly routes, and the Sutton public health team are working to ensure that walking and cycling are considered alongside other interventions when working to achieve specific health outcomes in relation to the local population, such as reduction of cardiovascular disease, diabetes-related conditions and depression.

The Daily Mile programme for sustainable travel to school is promoted, and Sutton was among the first boroughs for all schools to have a travel plan in place. However, with the increasing number of school expansions, new schools and lack of bus services open to students, improvements in services are needed to meet demand.

- ***for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041:***

While this target is laudable it is also idealistic with little chance of success, especially if the number of cycling and walking trips increases thus putting more vulnerable road users at risk in the short term. In addition, the increased number of large vehicles associated with housing construction across the capital, the increased number of company vans parked on street at employees' homes at night, and also the impact of the night time economy on increasing numbers of people out later in the evening, mean risk is increased not decreased. It also suggests the potential for significant streetscape changes where feasible to provide segregation from traffic, while not indicating how any such works would be funded. The council would urge the Mayor to consider how best to press for a continued reduction in KSIs and adopt a more realistic and achievable target.

- ***for all buses to be zero emission by 2037, for all new road zero emission by 2040, and for London's entire transport system to be zero emission by 2050:***

The council welcomes this initiative. The entire borough has been designated an Air Quality Management Area, and the majority of NOx emissions are, as might be expected, along the main transport corridors. Any such proposal to reduce the impact on these streets is to be welcomed, and would accord with our Sustainable Transport Strategy and Air Quality Action Plan. In rolling out cleaner buses there is a need to be careful not to focus on inner London, or to cascade older more polluting buses from central London to outer London boroughs unless these are already of a suitable emission standard. TfL should consider vehicle standard upgrades (particularly for hybrids) as routes come up for re-tender, thus spreading the load across the capital.

- ***by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public:***

The low public transport accessibility, high level of car ownership and number of out-commuters in Sutton, together with an expanding number of school places and pupils travelling some distance, means that the private car will continue to be a significant mode in the borough for many years to come. Even with the tightening of environmental standards, unless there is significant TfL investment in public transport infrastructure, frequency or routes, this will not be addressed within the proposed timescale.

- ***to open Crossrail 2 by 2033:***

The council supports this initiative. Only one station currently on the proposed map (Worcester Park, just to the west of the borough boundary) will offer a direct link to Crossrail 2, but the council recognises the benefits for both east-west and north-south transport for both residents and in-commuters.

We would urge TfL to consider in more detail how the bus network will support trips to/from Worcester Park and other neighbouring stations, and to look at increasing capacity and frequency on orbital routes such as the X26 to support this. More significantly, the proposed Tramlink extension

will improve access to Crossrail 2 and the wider rail network from the Sutton and Belmont corridor, via Wimbledon.

- ***to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor:***

As mentioned previously, the council was disappointed with the Secretary of State for Transport's decision not to devolve suburban services to TfL, and as a borough that has been especially poorly served by Southern the council will support the Mayor in his continued efforts for this. The council would also welcome a more uniform increased level of rail services in the borough, and a renewed look at the 2018 rail timetable proposed by Southern Rail/GTR for Hackbridge and Carshalton. The space availability at Cheam station and near Wallington station could be suitable for turnaround facilities. However, the complexity of train paths and service patterns within the borough and adjacent network mean that metro style services may not be feasible without significant infrastructure investment in the mainline rail network.

- ***to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared with the full network:***

The council supports this initiative but recognise that with no tube or Overground lines in the borough, and with only five from nine of the borough's stations classified as step-free stations, the proposed Tramlink extension would be the main avenue for improving step-free transport. The council asks that the Mayor should prioritise this proposal, and indicate how he proposes to work with central government and Network Rail for improved access at rail stations given the lack of identified future Access for All funds in the current Network Rail High Level Output Specification.

- ***to apply the principles of good growth:***

The council supports the principle of good growth and its draft Local Plan directs housing development to mixed use developments of appropriate densities in Sutton town centre and employment growth to the London Cancer Hub, and in other district centres such as Beddington and Hackbridge. Furthermore, the draft Local Plan recognises that Tramlink and other transport interventions need to take place so that this housing development and employment growth can be classified as good growth. With less reliance on private cars, the reduction in parking and manoeuvring space needed for associated development will reduce, allowing scope for greater housing density.

### **CHAPTER 3 – HEALTHY STREETS AND HEALTHY PEOPLE**

***4) Policy 1 and proposals 1-8 set out the Mayor's draft plans for improving walking and cycling environments (see pages 46 to 58).***

***– To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.***

The council supports the principles of this policy. As highlighted above, there is a clear opportunity to promote healthy active travel and the council is already proposing increases in walking (from 28% to 32%) and cycling (from 2% to 4%) through the draft Local Plan for 2016-31. The town

centre-focused housing growth should reinforce this by making local facilities available for new homes without the need to travel by private car, and there is more to be done in areas with low PTAL for the ageing population and the high number of children and young people in the borough.

**5) Policy 2 and proposals 9-11 set out the Mayor's draft plans to reduce road danger and improve personal safety and security (see pages 62 to 67).**

**– To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security? Please also describe any other measures you think should be included.**

It is difficult to see how the proposals in this section would make any step change in reducing road danger. All highways schemes are designed to current standards and undergo a comprehensive safety audit and post-implementation monitoring, so can be assumed to be as safe as is feasible.

Proposals to reduce speed limits should be assessed against the primary function of each route in question. Many routes in Sutton are on the TLRN and provide a strategic as well as local function, so it may be inappropriate to reduce them (for example 40mph to 30 or 30-20mph). However, the growing number and size of schools means that many are on or close to the strategic road network and so this must not be a one size, fits all approach.

Historically the police service have not enforced 20mph limits as rigidly as they would a higher speed limit, partly due to accuracy of detection equipment at lower speeds but also the need to prioritise resources, and have pressed for self-enforcing 20mph zones instead.

Perhaps the area most likely to improve safety is the new Direct Vision standard for HGVs, particularly in terms of vulnerable road users such as cyclists, and the council would welcome the introduction of these vehicles into the borough. The council would however question how the Mayor proposes to manage deliveries from outside London or indeed overseas, where standards will be different. As part of the Go Ultra Low Cities scheme Sutton and Croydon are partnering an opportunity for freight consolidation and cleaner vehicles by offering the lease of electric vans.

**6) Policy 3 and proposals 12-14 set out the Mayor's draft plans to ensure that crime and the fear of crime remain low on London's streets and transport system (see pages 68 to 69).**

**– To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London's streets and transport system? Please also describe any other measures you think should be included.**

We have no comments on this section.

**7) Policy 4 and proposals 15-17 set out the Mayor's draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).**

**– To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets? Please also describe any other measures you think should be included.**

The council supports the principle of space-efficient modes and would suggest this goes hand in hand with a road user hierarchy, as set out in our Sustainable Transport Strategy and the response you have received from the South London Partnership.

In dense suburban areas or small town centres, a variety of service and delivery vehicles cause delays to buses and other road users on a daily basis. The evolution of mini markets and small shops into metro-style mini supermarkets means that where once there might have been a single delivery each day it is not uncommon to see separate vehicles delivering bread, milk, frozen and dry goods, and where these arrive at the same time this causes significant problems for parking and loading on small streets. In tackling this, aside from greater consolidation the council supports moves to apply more robust loading restrictions to reduce impact on the peak periods. The ability to impose more stringent penalties on those vehicles that cause delays, in order to provide a greater deterrent, should also be taken up with central government.

The council continues to promote car clubs as a tool to reduce overall car use in new developments, and would support them as an alternative to journeys that cannot be made on foot, cycle or public transport. However, high car ownership and low PTAL rates in the borough are shown in research to be significant barriers, along with usage cost and opposition to dedicated bays at the expense of regular parking stock. 'Floating style' car clubs with no dedicated parking bays such as Car 2 Go have not been successful in the recent past, and were withdrawn having been received poorly by residents and actually contributing to an increase in car journeys, rather than a reduction.

**8) Proposals 18 and 19 set out the Mayor's proposed approach to road user charging (see pages 81 to 83).**

***– To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.***

Given the relatively low public transport accessibility in Sutton as highlighted elsewhere in this response, while the council has no comments on the existing charging arrangements and ULEZ proposals the council would not wish to see any further extension of charging regimes in the short term. That said the council would wish to continue working with Transport for London on issues such as emissions from freight and buses.

**9) Proposals 20 and 21 set out the Mayor's proposed approach to localised traffic reduction strategies (see page 83).**

***– To what extent do you agree or disagree with this approach? Please also describe any other measures you think should be included.***

The little-used Road Traffic Reduction Act 1997 already requires all highway authorities to prepare a report of their plans to reduce road traffic or mitigate growth of traffic, at any time such as the Secretary of State may direct. There may be an opportunity to seek a delegated power for London should the Mayor choose to do so.

However, for the reasons given above the council would be reluctant to support further significant traffic reduction measures (other than mitigation for new developments) without associated public transport improvements to offset any proposed reduction in private car traffic. The council will continue to progress wayfinding schemes and promote active travel through walking and cycling,

both through the LIP (should it continue), the Public Health strategy and the Local Plan. The latter, which is currently being updated, proposes maximum restraint-based parking standards for new developments together with requirements for cycle parking.

**10) Policies 5 and 6 and proposals 22-40 set out the Mayor's draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).**

**– To what extent do you agree or disagree that these plans would help London become a zero carbon city? Please also describe any other measures you think should be included.**

The proposals as drafted appear consistent with existing practices which the council supports, in particular the greening of public transport and the proposals for a wider ULEZ in London. As an outer London borough, the council looks to Surrey and its districts as much as towards other boroughs and inner London, and so is keen to understand more about how any emission restrictions through a ULEZ or similar will impact on servicing of the local economy and outside businesses serving the borough and central London, especially as it is not within our gift to control such traffic.

**11) Policies 7 and 8 and proposals 41- 47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).**

**– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.**

The council supports the principles in this section and would welcome clarity on whether the removal of impermeable highway surfaces is intended for existing highways or as part of new/upgrade schemes, how the figure was arrived at, and whether this will be funded separately from the LIP if not already a condition of planning consents.

#### **CHAPTER 4 – A GOOD PUBLIC TRANSPORT EXPERIENCE**

**12) Policy 9 and proposal 48 set out the Mayor's draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling (see pages 118 to 119).**

**– To what extent do you agree or disagree that these plans would provide an attractive whole journey experience? Please also describe any other measures you think should be included.**

The council supports the proposal that TfL will use the Healthy Streets Approach to direct complementary public transport and street improvements to provide an attractive whole journey experience. The council would like to understand whether the intention is for LIP funding to be enveloped within the Liveable Neighbourhoods funding, or whether TfL will be providing additional funding for this.

**13) Policies 10 and 11 and proposals 49 and 50 set out the Mayor's draft plans to ensure public transport is affordable and to improve customer service (see pages 121 to 125).**

***– To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport? Please also describe any other measures you think should be included.***

The council welcomes the proposals to maintain affordability of the public transport network, in particular the bus network. This is essential in Sutton where accessibility remains low, in order to incentivise ongoing use of the system to offset the inconveniences compared to the private car. The range of discounted and free accessible travel options for older people are not taken up as much as might be expected, and more should be done to promote Freedom passes, Taxicard, Dial a Ride etc. Likewise, as a borough with an ageing population and diverse working patterns, the council would welcome the inclusion of 'off peak' or part time season tickets on public transport as highlighted in the response by London Councils. It is disappointing that this is not already included in the strategy, particularly as main rail operators such as GTR and the new South Western Railways franchise propose introducing such measures within the next few years.

***14) Policy 12 and proposals 51 and 52 set out the Mayor's draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan (see pages 127 to 129).***

***– To what extent do you agree or disagree that these plans would improve accessibility of the transport system? Please also describe any other measures you think should be included.***

The council supports Policy 12, and it is important that our streets and public transport network are accessible to all. The benefits of walking and cycling and Healthy Streets can be felt by older people and disabled people if streets are designed to be inclusive. However, as a borough with no Underground or Overground lines, and with low bus accessibility, it is important that the rail stations be as accessible as possible. A number of these are currently not step-free, and while stations such as Carshalton are within the current Access for All programme there is presently no identified future Access for All funding in the current Network Rail High Level Output Specification for 2019-24. The council is concerned that priority is likely to be given to larger, more central stations and that local stations will lose out for years to come. As such the council wishes to understand more about what plans the Mayor has to work with national government and Network Rail to increase funding for step-free access, and how he intends to prioritise the work.

For buses, although tender specifications detail the accessibility levels for vehicles used on particular routes, we receive regular comments from users who find that less suitable buses are being used and leave them with either insufficient space on board or difficulty boarding at all. As such we ask TfL to monitor activities more closely.

As highlighted by London Councils in their response, the council is also concerned by the lack of future actions in Figure 17 in terms of customer service training for staff in accessibility. Clarity would be welcome on how this forms an ongoing rather than one-off activity as demands and legislation changes.

***15) Policy 13 and proposals 53 and 54 set out the Mayor's draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed (see pages 133 to 137).***

***– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.***

While the council would welcome improvements in quality, accessibility, frequency and reliability of the existing bus network, as highlighted elsewhere in this response the borough experiences significant low PTAL levels for large areas. The strategy recognises the potential for flexibility within the bus network, but when seeking improvements in service, the council finds TfL to be much less flexible, and with the recent changes to grant funding even less so. A number of the routes suffering low accessibility in Sutton are the east-west orbital and suburban routes, with the south of the Borough most affected, with few services in some areas. As such the council welcomes the proposal to redistribute bus resources from central to outer London, notwithstanding concerns about the emissions standards of vehicles deployed.

***16) Policy 14 and proposals 55 to 67 set out the Mayor’s draft plans to improve rail services by improving journey times and tackling crowding (see pages 140 to 166)***

***– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.***

The council welcomes plans to increase tram capacity in Proposal 66 but wants the final MTS to be more ambitious in its approach to Tramlink extension, primarily to Sutton but also in considering other extensions to, and new stations on, the existing tram network to support housing and jobs growth. An example of this would be to extend the line from Wimbledon and Morden, via Sutton, to the proposed London Cancer Hub so that it connects with the Underground network at Morden and Overground and Crossrail 2 services at Wimbledon. As highlighted above, for this we also require the support of TfL to explore further innovative funding mechanisms to fund the required infrastructure, including the potential for a Growth Zone.

Along with London Councils, the council therefore wants to see the final MTS amended to include a further proposal that the Mayor, through TfL, will upgrade the existing tram system to improve its reliability and to increase its capacity by 85 per cent to/from Croydon by 2030, and explore innovative funding mechanisms to deliver tram extensions to the existing network.

***17) Policies 15 to 18 and proposals 68 to 74 set out the Mayor’s draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully inclusive and well-connected public transport system. The Mayor’s policy to support the growing night-time economy is also set out in this section (see pages 176 to 187).***

***– To what extent do you agree or disagree that these plans would deliver a well-connected public transport system? Please also describe any other measures you think should be included.***

The council supports the broad scope of Policy 18 in ensuring that London’s taxi and private hire vehicle service is safe, secure and accessible. For proposal 74, as highlighted in the response from London Councils training for cab drivers should be an ongoing rather than one-off requirement, backed up by TfL monitoring.

## **CHAPTER 5 – NEW HOMES AND JOBS**

***18) Policy 19 and proposals 75 to 77 set out the Mayor’s draft plans to ensure that new homes and jobs are delivered in line with the transport principles of ‘good growth’ (see pages 193 to 200).***

***– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.***

The council fully supports Policy 19 for good growth and considers that its draft Local Plan is fully aligned with this strategy. In terms of using transport to create high-density, mixed-use development, the council's draft Local Plan plans for a housing target higher than that in the current Local Plan and expects 55% of this growth to occur in Sutton Town Centre. Sutton Town Centre is already the area within the borough with the highest public transport accessibility but such a level of growth, combined with previous over-delivery, will require major transport infrastructure development. Opportunities for affordable accessible homes will also help manage the issue raised previously of children living at home with parents into their 40s, which also results in parking stress in local streets caused by high numbers of car ownership per household.

The council welcomes the Mayor's commitment to deliver a Tramlink extension to Sutton but considers that, as much of this growth will occur before 2021, a Tramlink extension is not of the utmost urgency.

In terms of using transport to unlock growth potential in underdeveloped parts of the city, the council would like to highlight the London Cancer Hub which will be a medical research and development centre of excellence on vacant land adjacent to the world famous Institute of Cancer Research and Royal Marsden Hospital. For this exciting development to be considered 'good growth', it needs to be accompanied by transport infrastructure, such as a Tramlink extension from Wimbledon, via Sutton, to the London Cancer Hub or other transport interventions that will have the same effect as a Tramlink extension.

***19) Proposals 78 to 95 set out the Mayor's draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving existing public transport services, providing new river crossings, decking over roads and transport infrastructure and building homes on TfL land (see pages 202 to 246).***

***– To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth? Please also describe any other measures you think should be included.***

The council welcomes reference to proposals for a Tramlink extension to Sutton. The borough would benefit enormously from this proposal and the scheme would go a long way to improve accessibility levels in the borough in the absence of Underground and Overground lines. It is disappointing that this relatively low-cost (in rail construction terms) scheme does not warrant a separate proposal within the document and so we would urge the Mayor to include one as mentioned in our response to question 16 above.

***20) Policy 20 and proposal 96 set out the Mayor's proposed position on the expansion of Heathrow Airport (see pages 248 to 249).***

***– To what extent do you agree or disagree with this position? Is there anything else that the Mayor should consider when finalising his position?***

The council recognises the need for residents and local businesses to access Heathrow and Gatwick airports by public transport, and that improvements are needed for Heathrow regardless of whether

expansion takes place or not. As part of this, alongside proposals for rail access the opportunity to increase the frequency and capacity of services such as the X26 should be taken, and in this respect we welcome the recent introduction of double deck buses on the route.

## **CHAPTER 6 – DELIVERING THE VISION**

***21) Policy 21 and proposals 97 to 101 set out the Mayor’s proposed approach to responding to changing technology, including new transport services, such connected and autonomous vehicles (see pages 258 to 262).***

***– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?***

The council welcomes and supports the principles set out in Policy 21 for assessing the role of new technology in the transport network in London and shares the Mayor’s concerns that car clubs, ride-sharing and other forms of car-sharing should not be a replacement for journeys currently undertaken by walking, cycling and public transport. However, whilst we agree that a shared car takes up the same amount of space as a private car, this obscures the fact that one car on the road takes up less space than four.

The council is interested to learn more about proposals for demand-responsive bus services. Sutton already has a number of S bus services operating on a ‘hail and ride’ basis, which increases the number of pick-up and drop-off points. Providing any new proposals do not have a negative impact on existing accessibility levels, any such initiative is to be welcomed. The Council is keen to keep the hail and ride option on the S bus routes, but our experiences show that bus operators will need encouragement to run bus responsive services.

***22) Policy 22 and proposal 102 set out the Mayor’s proposed approach to ensuring that London’s transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).***

***– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?***

The council has no objection in principle to this approach, however where the case for investment is substantial but there is a lack of significant developer funding the council would wish to hear more from the Mayor about how he would approach this. The borough contributes to a number of precepts for large scale developments such as Crossrail, but it is often difficult to see what benefits are given in return.

***23) Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor’s approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283).***

***– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?***

We are concerned that the Living Neighbourhoods funding proposals could remove the benefits of LIP from the Boroughs, and the proposed addition of a range of targets is a concern here. We have also seen and endorse the views of London Councils regarding changes to the proposed guidance for

the next round of LIPS, including concerns about the resources needed to produce and monitor the new documents.

**24) Are there any other comments you would like to make on the draft Mayor's Transport Strategy?**

The Mayor may wish to explore the following issues and include policies on the following:

- Support for reverse (inbound) commuting, which encourages the efficient use of existing public transport infrastructure and which could be encouraged by development in Sutton Town Centre and at the London Cancer Hub
- Funding for access to and movement within industrial estates. The London Borough of Sutton is the location of three of London's 42 Strategic Industrial Locations (SILs). These are long-standing locations for employment should be fit for 21<sup>st</sup> Century industrial practices. As much of this involves waste management and logistics, investment in the road network in and around SILs is important to ensure there is no conflict between industrial uses and residential uses and to ensure that industrial development in SILs follow the principles of 'good growth'.
- Hospital travel – more needs to be done on developing bus links to hospitals such as Epsom which serves the borough but where the catchment spans the GLA boundary.