



SPAGHETTI SOUTH WESTERN

UNTANGLING TRANSPORT IN SOUTH WEST LONDON

Contents

Executive Summary	2
Recommendations	3
Why South West London?	4
The Status Quo	5
The Advantages of a South West London Transport Strategy	6
Planning and development	8
Delivering Transport Infrastructure	12
A Wish List	13
Recommendations	14
Conclusion	15

Executive Summary

In his 2021 Manifesto, Sadiq Khan wrote the following on outer London¹:

“I recognise that outer London has unique challenges when it comes to transport, so I will work with TfL on a strategy for the suburbs, designed to increase connectivity in outer London through improved bus networks but also considering the role of rapid bus transit and trams.

“I will also ask TfL to consider an Outer London Town Centres Fund to improve public transport and walking and cycling options in boroughs on London’s outskirts.”

As pledges go, this was a positive one. The Mayor is right that “outer London has unique challenges when it comes to transport”. However, whilst those challenges certainly include transport, they also include planning and development and the symbiotic way in which transport, planning and development co-exist. Secondly, whilst there would clearly be benefits to ‘a strategy for the suburbs’, separate strategies for different parts of outer London would be better. It is important to recognise that suburban London is not one homogenous zone: Sutton and Croydon are very different from Ealing and Hillingdon or Havering and Redbridge.

In addition, it is vital that any new strategies involve the input of those who will be affected by them. The Mayor and Transport for London (TfL) seeking to impose plans on Outer Londoners would be both unacceptable and a mistake. Instead of a top-down approach, in which TfL tells outer London boroughs exactly what their unique challenges are, London’s boroughs and local residents should be intimately involved with explaining to Transport for London what they need.

The purpose of this report is to make the case for a regional transport strategy for South West London. To be clear, the report will not seek to lay out an argument for what that strategy should be. Such a strategy should lay out what additional transport provision South West London requires. It should also make clear what further transport infrastructure would be required if new developments were to be built. In this way, a South West London Regional Transport Strategy would improve the assessment of new developments to ensure that they could be properly supported by new or existing transport provision, and would clearly show those parties considering development exactly what would be required to make their proposal worthy of consideration. It could also set out how development funding could be put to best use in order to maximise the provision of new transport infrastructure.

¹ Page 98, <https://sadiq.london/wp-content/uploads/2021/04/Sadiq-for-London-Manifesto-.pdf>

Recommendations

1. Transport for London should work with Hounslow, Kingston and Richmond Boroughs, as well as local residents and stakeholders across those boroughs, to create a South West London Transport Strategy. This would be a strategic review of transport provision in South West London that would help inform local development and infrastructure. Residents should not be expected to wait for this work to begin, so the Mayor should confirm by 1st September that discussions to create a strategy have started.”
2. The South West London Transport Strategy should include an assessment of transport capacity and infrastructure needs in relation to new development, which can be used as an evidence base in planning applications and local plans for a cumulative approach to assessing the transport impacts of proposed developments.
3. The South West London Transport Strategy should give consideration to how development funding, through Community Infrastructure Levies and pooled Section 106 agreements, could best be used to help fund new transport infrastructure to support new development. This could include a comprehensive and robust ‘wish list’ of local transport infrastructure projects.

Why South West London?

For the purposes of this report, South West London refers to the three boroughs that I represent on the London Assembly: Hounslow, Kingston-upon-Thames and Richmond-upon-Thames. My focus on South West London should not imply that other constituencies do not require a transport strategy. Indeed, by utilising South West London as a case study, I hope it will be possible to create a template that other parts of outer London could follow. There is no reason why there should not be a regional transport strategy for North West London or for South East London. Equally it is not for South West London, South West Londoners or a South West London Assembly Member to tell other parts of Outer London what their strategies should look like.

Nevertheless, there is a strong case for South West London Transport Strategy. As I will go on to outline, there have been a number of developments and proposed developments in South West London where there was a failure to recognise the scale of transport changes that would have been necessary to make such a project viable. There would be great value in a strategy that shows clearly what are the transport issues across South West London, where are the specific stresses on existing transport infrastructure and which lays out the direction of travel for where the region wants to be in the future.

Furthermore, South West London is a relatively cohesive area that would benefit from greater connectivity within it. Mainline rail from South Western Railway travels through Wandsworth and or Merton before entering Richmond or Kingston. Some of the Richmond trains then travel into Hounslow via either the Hounslow Loop² or through Feltham. Bus routes such as the 285³ and the X26⁴ travel through all three boroughs on their way to Heathrow Airport. Nevertheless, there are parts of South West London, such as Ham, have poor public transport connectivity.

Additionally, South West London looks out beyond London as well as inwards towards the centre. The major train line through Wimbledon, Kingston and Teddington has its terminus in Shepperton, 12 minutes beyond Hampton – the last London Station on the line. Many residents are just as likely to travel to Esher, Epsom or Staines as to Wimbledon, Putney or Sutton. The M3 is a direct continuation from the A316, which runs from Chiswick straight through the middle of Richmond and out of London. A London-wide strategy, or even an outer London strategy, would inevitably fail to recognise the unique needs of South West London, in large part because that is not what those strategies would be designed to do.

² <https://www.railtables.co.uk/wp-content/uploads/railtables/swr/may18/pocket07.pdf>

³ <https://tfl.gov.uk/bus/route/285/>

⁴ <https://tfl.gov.uk/bus/route/X26/>

The Status Quo

Currently, every major prospective development in London will be assessed by Transport for London. TfL will use the Mayor's Transport Strategy⁵ (MTS) as a guide and consider whether the development meets its aims. These assessments consider the impact on the transport requirements of a specific development, but by their very nature they fail to properly consider the wider context of the changes they recommend. It is worth noting that the MTS covers the whole of London and, whilst it notes that there are differences between inner and outer London, there is little acknowledgement of the extent to which many of those differences would be seen as positives by residents of outer London. Moreover, this process does not take a wider assessment of an area so there is little sense of how changes would fit into the overall direction of travel and there is no sense of how transport should evolve. A strategy that made clear what South West London should look like in a decade would enable any changes being considered as a reaction to a one-off change to be contextualised.

To take Richmond as an example, there is a significant challenge in the traffic volumes in Richmond Town Centre. Reducing that traffic without simply pushing it elsewhere and without using a blunt approach that removes the option of driving for those who need to do so requires careful planning. It would consider what impediments there are to more people walking or cycling. It might assess whether there are motorists who might be unwilling to walk or cycle but who would travel via e-bike or electric scooter. It could study whether better orbital public transport options would reduce the need to drive. If so, it could seek to ascertain which options would have the highest benefit to cost ratio (BCR).

Finally I should note that in October 2016 the Mayor of London and Kevin Davis, the then Leader of Kingston Council, published a joint document setting out a Direction of Travel for the Royal Borough of Kingston-Upon-Thames.⁶ This is a genuinely useful document, filled with plenty of detail which might be usefully included in a South West Transport Strategy, but given the focus was deliberately on a single borough the document misses out on the extent to which new developments in Kingston have knock-on impacts across the three boroughs that make up South West London. That is not to criticise the document but simply to suggest that just as a London-wide document risks having too broad a focus, there is a value in a regional approach that casts its eye wider than on a single borough.

⁵ <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

⁶ <https://www.kingston.gov.uk/downloads/file/430/direction-of-travel-for-kingston-2016>

The Advantages of a South West London Transport Strategy

The benefits of a forward-looking strategy that shows where South West London aims to be in 5, 10 or 20 years are manifold. By taking a long-term approach, it is easier to contextualise any proposed changes. Moreover, it then makes it easier to consider how the BCR would be impacted by different potential developments. For example, if a new housing development would improve the case for a new bus route that the strategy shows is already desirable then there are benefits to having clarity on that.

The pace of change within urban and suburban transport is relentless. The rise of shared usage, autonomous vehicles and a range of smaller or micro vehicles is creating a huge opportunity for improved transport provision. Rather than a top-down approach which picks one mode or another, a regional strategy that recognised the mix is going to change and that aimed to design transport for the future to take account of this change, would be incredibly valuable. To be clear this would not mean being opposed to a particular form of transport, but rather recognising that by going with the grain of how South West Londoners want to travel it should be possible to improve choices and convenience for people. Currently, without a plan, the approach tends to default to pitting one transport mode against the other, and deliberately making it increasingly difficult to drive in an attempt to force people out of their cars.

There are further benefits to the clarity of laying out in detail the transport needs of South West London in a single strategy. Doing so can make clear where there are already pressures on transport. It can show where there are junctions that are already problematic and need fixing – such as the turn off on the South Circular, from Clifford Avenue to Chalkers Corner – as well as roads or junctions which would struggle to cope with much additional traffic. Currently the numbers of people driving through Kingston to Gatwick Airport puts significant pressure on Malden Rushett. A strategy should address the extent to which Malden Rushett could cope with any additional traffic and consider the best options for reducing existing traffic volumes.

Furthermore, there are specific issues which impact the whole of South West London. An obvious example is the closure of Hammersmith Bridge. Whilst the bridge is under Hammersmith & Fulham Council's control, its complete closure and its closure to motorised vehicles has had a significant impact on my constituency. Whilst the closure primarily affects Richmond, it has had a knock-on effect across the whole of South West London. A strategy that measures that impact and aims to put in place measures to ameliorate it would be valuable. A further example is the proposed expansion of Heathrow Airport. Whilst Heathrow itself is located just outside Hounslow in Hillingdon, the airport has a huge impact on Richmond and Hounslow and a smaller but still significant impact on Kingston. The impact of expansion on noise pollution for local residents and on traffic congestion would be considerable.

In this way a strategy would help to clarify a list of transport priorities for South West London, showing which changes and improvements would create the biggest 'bang for their buck'. This might mean identifying bigger projects but recognising that they should be prioritised, and Section 106 funding should be diverted to them wherever possible. It might also mean creating a list of 'quick wins' – changes that could be introduced swiftly and relatively cheaply that would be of benefit to many residents.

Planning and development

Sadiq Khan's London Plan 2021 sets housing targets for each London borough. Over the next ten years, the Plan requires at least 17,820 new homes in Hounslow, 9,640 in Kingston and 4,110 in Richmond⁷. It equates to a total of 31,570 new homes across the three South West London boroughs. This is nearly double the combined ten-year target of 17,806 homes in the previous London Plan 2016⁸.

These housing targets should also be seen in the context of the particular transport challenges for this area, notably a lack of accessibility to public transport, as discussed elsewhere in this report. It is also the case that many suburban areas will have lower public transport accessibility level (PTAL) ratings, and this is certainly true for the South West London boroughs⁹.

In recent years some major developments have been approved across the three South West London boroughs, and are now in the housing pipeline. This includes: 2,150 homes on the Tesco and Homebase sites in Osterley¹⁰ (although this is now subject to Secretary of State call-in); 453 units at the Homebase site in Manor Road, Richmond¹¹; 83 homes at Barnes Hospital¹²; 487 homes at Brentford FC¹³; 115 homes at Twickenham Station¹⁴; 2,170 homes on the Cambridge Road Estate in Kingston¹⁵; and 261 units at Tolworth Tower¹⁶.

By contrast, many of these large development sites have very low PTAL ratings. For example, a PTAL of 2 at Tesco Osterley, 1a at the Cambridge Road Estate, 1b at Twickenham Stadium, and 2 at Barnes Hospital. There are many other examples of low PTAL areas of South West London, including Malden Rushett, Lower Feltham, Hanworth Park, Ham and Petersham.¹⁷

An increase in the supply of new homes is much needed across London. At the same time, it is important that new housing developments are appropriate for the local area and meet local needs. Crucially, new development must also be supported by good local

⁷ [London Plan 2021](#), GLA, p163

⁸ [London Plan 2016](#), GLA, p96

⁹ <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

¹⁰ <https://www.mylondon.news/news/west-london-news/tower-blocks-approved-osterley-homebase-20355613>

¹¹ https://www.london.gov.uk/sites/default/files/hearing_report_gla.4795.03_-_pdf.pdf

¹² http://www2.richmond.gov.uk/plandata2/Planning_CaseNo.aspx?strCASENO=18/3642/OUT

¹³ <https://www.brentfordfc.com/news/2017/december/stadium-planning-committee-07.12.17/>

¹⁴ https://www2.richmond.gov.uk/lbrplanning/Planning_CaseNo.aspx?strCASENO=11/1443/FUL

¹⁵ <https://gla.force.com/pr/s/planning-application/a0i4J000002UOhYQAG/20206860?tabset-c2f3b=2>

¹⁶ <https://gla.force.com/pr/s/planning-application/a0i4J000002S9oHQAS/20206297?tabset-c2f3b=2>

¹⁷ <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

infrastructure, including transport infrastructure. The level and quality of transport and other infrastructure can be a vital ingredient in the success of new housing developments, especially on major development or regeneration sites. It can also impact on local support for new development¹⁸. In this way, transport and development can be seen as inextricably linked.

The impacts of particular developments on traffic, congestion and car parking are often very common local concerns when new planning applications are being discussed. This has particular relevance in many parts of South West London, where people often rely heavily on cars due to lack of suitable alternatives, especially for local journeys. Whilst residents may or may not need to use their cars every day, depending on how they commute to work, they are more likely to retain a car for certain journeys.

The London Plan restrictions on car parking in new developments can make this especially problematic. Under the current version of the Plan, many housing developments are required to be “car free”, whilst others are limited in the number of parking spaces they can provide per unit¹⁹. Being “car free” means that developers are not permitted to provide parking spaces in their new developments, sometimes with additional measures such as restricting parking permits from being issued in controlled parking zones. It does not, however, mean that future occupiers will not own cars. Limiting off-street parking in this way can lead to overspill parking in surrounding roads, harming local amenity and causing or exacerbating congestion problems. This approach is motivated by the idea that making it difficult for new residents to park their cars will reduce car ownership and therefore car usage.

However, it is important to recognise that many people in London, especially in suburban areas, choose to drive for many reasons, not least because they find it an efficient form of transport, or lack suitable alternatives in their area. Therefore, where modal shift is desirable, a better and more realistic approach would be to focus on the provision of a wider range of transport options where possible²⁰. Providing more off-street parking can also help the take-up of electric vehicles by giving more people the opportunity to have their own charging point at home, as well as providing more opportunities for car clubs and other car sharing initiatives.

One of the problems in dealing with and mitigating new developments is the way in which transport and other impacts are assessed. All too often, the individual impact of that particular development may be assessed, but without an understanding of the cumulative impacts with other recent or planned developments in the area. This can lead to a piecemeal approach, whereby the impact of a single development on the local highway or public transport network may be considered relatively minor, but the sum of all current and future developments in a particular area may be quite significant.

¹⁸ [Residential Parking Guidance Note](#), Chartered Institution of Highways and Transportation

¹⁹ [London Plan 2021](#), GLA, p422-423

²⁰ [Does car ownership increase car use?](#), Berkeley Group, 2011

This was a key concern, for example, in consideration of the Former Stag Brewery development proposal in Mortlake, London Borough of Richmond. This was a planning application for a major development in Mortlake, originally of 813 housing units, which was partially approved by Richmond Council in April 2020. It was subsequently called-in by the Mayor, increased to 1,250 units and ultimately rejected²¹. During the planning process, major concerns were raised about the suitability and accuracy of the transport assessment that accompanied the application, especially regarding the ability of nearby Thames Bank to support the level of traffic that was being claimed²².

This is where a regional transport strategy can have real benefits. If the transport needs of an area have already been identified, this can provide a useful evidence base for assessing the cumulative impact of each new planning application. It can complement the transport assessments submitted by applicants, as well as the responses of local highways officers and – in the case of major developments – Transport for London, to better inform planning decision makers in determining the planning applications in front of them.

This strategic approach can also bring financial opportunities for new infrastructure funding. In order to mitigate the impact of new developments, local planning authorities can negotiate Section 106 agreements with developers to provide financial or other benefits for the local area. They can also establish a Community Infrastructure Levy (CIL), as an automatic tariff on different types of new development in the area, levied on the amount of new floorspace provided.

If planning authorities only have information about the individual impacts of a particular development, this limits the amount of funding they can negotiate or achieve from both of these sources. However, if a regional strategy is able to provide a clear understanding of new transport infrastructure required in an area to support local development, this can provide an evidence base to negotiate better outcomes. Section 106 moneys can be pooled across multiple developments to support specific local infrastructure projects, whilst infrastructure lists are also integral to the process of setting Community Infrastructure Levies and the tariffs that an authority is able to set.

For example, since 2012 a specific Community Infrastructure Levy has been set across London, by the Greater London Authority, to provide funding for Crossrail²³. As part of the scheme, the impact of Crossrail was assessed for each area of London, with varying tariff levels to reflect this. The latest version of this CIL was introduced in 2017. There is no reason why a similar system could not be used in South West London, either by local authorities or the Mayor, to help fund specific infrastructure needs identified in a regional transport strategy.

²¹ <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/former-stag-brewery-public-hearing>

²² <https://www.london.gov.uk/questions/2021/2044>

²³ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/mayoral-community-infrastructure-levy>

The London Plan does currently provide an indicative list of future transport projects²⁴. However, this is very general, somewhat vague, and lacks specific delivery details. By contrast, the opportunity from a regional transport strategy is to provide a comprehensive 'wish list' of local transport infrastructure projects, demonstrating how such projects could support local developments and make them more viable for the local area, ready to deploy in transport assessments for new developments, in Section 106 negotiations, and in CIL arrangements. By doing so, not only could this provide more realistic and reliable assessments of the cumulative impact of new developments in South West London, but also provide a greater ability to fund new transport infrastructure to mitigate these impacts and potentially help resolve longstanding transport issues in the area. It could also help gain much-needed public support for new residential development, provided that it is appropriate for the area and meets local needs.

²⁴ [London Plan 2021](#), GLA, p408-410

Delivering Transport Infrastructure

In his report *Derailed: Getting London's Transport Back on Track* my colleague Keith Prince AM recommended:

“The Mayor and TfL should actively seek to facilitate the rollout or expansion of transport infrastructure and services that it does not and will not provide itself such as e-bikes, e-scooters, dock-less bikes and car clubs.”

This point would be apposite for a South-West London Transport Strategy. At a time when Transport for London is in financial difficulties it may be hard to rely on central funding. A consideration of the benefits of transport infrastructure which would not rely on the public purse would be valuable. For example there is evidence that each car club vehicle in London takes 23.5 privately-owned vehicles off the road.²⁵ Therefore it is worth considering the extent to which facilitating the expansion of car clubs – something that London's boroughs can do relatively easily - would reduce congestion.

Connectedly, a localised strategy should look at the impact of delivery and consider how should South West London best achieve more efficient and greener forms of delivery. Converting all delivery vehicles to run on Hydrogen or replacing them with electric vehicles would improve air quality, but would not reduce congestion. If delivery vehicles are often empty, then is there a role for a hub and spoke delivery mechanism or e-cargo bikes? Again, these are questions that are best asked at a South-West London level. Seeking to impose an answer across the whole of outer London means assuming that one size fits all and ignores the differences across outer London. It would be possible to reach decisions on delivery vehicles at a borough level, but these would be more effective if there were cross-borough agreement between Hounslow, Kingston and Richmond.

²⁵ <https://como.org.uk/wp-content/uploads/2021/06/CoMoUK-London-Car-Club-Summary-Report-2020.pdf>

A Wish List

Whilst this report is not designed to say what a South West London Transport Strategy should include, there are plenty of suggestions that I have come across in the process of researching this document. The five possibilities below are far from an exhaustive list, but may offer a flavour of the sort of ambitious possibilities that I would hope a strategy might contain:

- A solution to the fact that there are 4 level crossings across the mainline rail train line running through Richmond as well a 5th level crossing in Hounslow on the same line. These are down for 46 minutes an hour at peak times, causing significant local congestion.²⁶ Suggestions for removing them include tunnelling the train line. Currently they reduce capacity on the line and cost time and money for motorists waiting to cross.
- There may be a number of opportunities where putting sections of major roads underground could improve air quality and enable the surface roads to be put to different uses. The A3 through Tolworth has been suggested to me as a good candidate for this.
- The X26 is a popular express bus route that traverses all three boroughs. There may be a number of possible options for express orbital bus routes that would better interconnect South West London and improve connections between South West London other parts of the capital and, indeed, areas outside the Great London boundary.
- Too many South West London stations lack step-free access and are therefore not accessible to many residents. The strategy should consider if there are ways to accelerate the provision of step-free access on both mainline rail and on the London Underground.
- Malden Rushett is effectively a small village, but one that receives a wildly excessive volume of traffic. A by-pass would represent a great improvement for both local residents – who would enjoy safer roads and better air quality – and for motorists.

²⁶ <https://www.richmondandtwickenhamtimes.co.uk/news/15564460.network-rail-report-finds-mortlake-level-crossing-on-sheen-lane-is-high-risk-to-pedestrians-cyclists-and-vehicle-users/>

Recommendations

1. Transport for London should work with Hounslow, Kingston and Richmond Boroughs, as well as local residents and stakeholders across those boroughs, to create a South West London Transport Strategy. This would be a strategic review of transport provision in South West London that would help inform local development and infrastructure. Residents should not be expected to wait for this work to begin, so the Mayor should confirm by 1st September that discussions to create a strategy have started.”
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3. The South West London Transport Strategy should give consideration to how development funding, through Community Infrastructure Levies and pooled Section 106 agreements, could best be used to help fund new transport infrastructure to support new development. This could include a comprehensive and robust ‘wish list’ of local transport infrastructure projects.

Conclusion

A well-designed, integrated approach to South West London's transport would improve efficiency and reduce the cost of transport for local residents. As this report has shown, there are many benefits to designing the system well. Contrastingly, with no clear idea of where we are trying to get to, it often proves extremely difficult to bring people along with us.

This report could have been a first draft on what a South West London Transport Strategy should look like. However I have no interest in politicising an issue for which there should be cross-party support. Whilst there will almost inevitably be some disagreement about the contents of a South West London Transport Strategy, I am optimistic that there should be agreement on the concept and on the benefits of such a strategy. If so then I hope this report represents a first step in delivering genuine benefits for South West London.



GREATER LONDON AUTHORITY
CONSERVATIVES