

## MAYOR'S TRANSPORT STRATEGY AND TRANSPORT FOR LONDON INTERIM ANNUAL SPENDING SUBMISSION 2018/19

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Planning, Transportation and Recycling
<b>Officer Contact</b>	Alan Tilly, Residents Services
<b>Papers with report</b>	None

### HEADLINES

<b>Summary</b>	To make a decision upon the content of the Council's response to the invitation to comment on the Mayor's Transport Strategy - Draft for public consultation (2017) and authorisation to prepare and submit to TfL the Council's Interim LIP, Annual Spending Submission 2018/19.
<b>Putting our Residents First</b>	<p>This report supports the following Council objectives of: <i>Our People; Our Natural Environment; Our Built Environment; Our Heritage and Civic Pride; Strong financial management.</i></p> <p>The Council's adopted Local Plan Part 1 (2012) and the emerging Local Plan Part 2 Development Management Policies, Site Allocation and Designation and Policies Map.</p>
<b>Financial Cost</b>	There are no direct financial costs arising from this report. The preparation of the Annual Spending Submission will enable the Council to secure funding from TfL for the 2018/19 Interim LIP.
<b>Relevant Policy Overview Committee</b>	Residents' and Environmental Services
<b>Relevant Ward(s)</b>	All

## RECOMMENDATIONS

### That Cabinet:

- 1. Instructs officers to respond to the invitation to comment on the Mayor's Transport Strategy - Draft for consultation (2017) expressing the views set out in this report;**
- 2. Reiterates the motion approved by full Council at its meeting on 6 July 2017 from the Cabinet Member for Planning, Transportation and Recycling:**

*'That Hillingdon Council acknowledges that car ownership is vital to our residents as a means of going about their daily business, especially if having to travel across the Borough north/south. The Council therefore reaffirms its current planning policy relating to car parking spaces for new developments and will resist attempts to reduce this standard at the cost of higher density of future developments.'*

- 3. Agrees the principles of the Council's Interim Local Implementation Plan 2018/19 Annual Spending Submission to Transport for London as set out in the report;**
- 4. Delegates authority to the Deputy Chief Executive and Corporate Director of Residents Services, in consultation with the Leader of the Council and Cabinet Member for Planning, Transportation and Recycling, to agree the final Interim Local Implementation Plan Annual Spending Submission 2018/19 prior to submission to Transport for London;**
- 5. Notes that the subsequent progression of any individual scheme or programme in the Interim Local Implementation Plan Annual Spending Submission 2018/19 and funded by Transport for London budgets, will also be subject to the Council's democratic capital release procedures requiring final sign-off by the Leader of the Council and Cabinet Member for Finance, Property and Business Services.**

### Reasons for recommendation

In June 2017 the Greater London Authority (GLA) published the Mayor's Transport Strategy - Draft for public consultation. To help protect the Council's interests the Council should forward its comments to the GLA as the Council is obliged to use TfL Interim Local Implementation Plan (LIP) funding to implement transport projects and programmes that are in pursuance of the Mayor's Transport Strategy (MTS).

The LIP is the mechanism used by London boroughs to deliver locally the Mayor's Transport Strategy objectives and by which TfL provides funding to the boroughs towards this end. The London Borough of

Hillingdon is required to prepare and submit to TfL by Friday 20<sup>th</sup> October 2017 the Interim LIP Annual Spending Submission 2018/19. The Annual Spending Submission sets out the proposed expenditure on transport schemes on a project-by-project basis for the coming financial year.

### **Alternative options considered / risk management**

Cabinet could decide not to submit an Interim LIP Annual Spending Submission but this would put at risk a significant amount of funding that TfL have indicated is available to the Council for investment on a range of transport projects and programmes.

### **Democratic compliance and previous authority**

Cabinet authority is required to respond to such consultations and also authorise submission of any bid to an external public body where a financial commitment or any agreement by the Council may be required.

### **Policy Overview Committee comments**

None at this stage.

## **SUPPORTING INFORMATION**

### **'Mayor's Transport Strategy - Draft for public consultation (2017)'. Issues pertinent to Hillingdon**

1. On 21st June 2017 the GLA launched the "Mayor's Transport Strategy - Draft for public consultation (2017)" setting out policies and proposals for transport in London over the next 25 years. The GLA has asked stakeholders for their views on the Mayor's Transport Strategy (MTS), the public consultation for which remains open until 2nd October 2017.
2. The MTS contains 24 Policies that focus on a 'Healthy Streets Approach' with three main themes.
  - Healthy Streets & healthy people - *"Creating streets and street networks that encourage walking, cycling and public transport use"*
  - A good public transport experience - *"An easy to use and accessible public transport system"*
  - New homes and jobs - *"Planning the city around walking, cycling and public transport use will unlock growth in new areas"*
3. Stemming from this, there are then 103 Proposals aimed at delivering the Mayor's vision.
4. The MTS has been produced against a backdrop of population growth; the population of London is forecast to grow over the next 25 years from 8.7m in 2017 to 10.5m in 2042. The MTS predicts that by this date, London will require two million new jobs and more than one million new homes. The MTS recognises that transport has a key role to play in delivering this growth, by making London a better place to live, a city that is better connected, less congested,

has better air quality, where traffic is less intrusive and the streets are safer for all. The MTS suggests that this can be achieved through 'good growth' that satisfies the principles of:-

- Good access to public transport;
- High-density, mixed-use developments;
- People choosing to walk and cycle - active travel;
- Car-free and so-called 'car-lite' places;
- Inclusive, accessible design; and
- Carbon-free travel.

5. It is a stated aim of the Mayor's Strategy that by 2041, 80 per cent of all Londoners' trips will be made on foot, by cycle or by public transport.

6. The MTS recognises that achieving this aim presents particular challenges in outer London Boroughs, an obvious example being areas in the north of Hillingdon where journeys are longer and have many different start and end points, making it harder to provide efficient public transport services.

7. The MTS describes some parts of London as being 'cut off' by poor Tube, rail and public transport links, especially during the off-peak and at weekends. Given the limitations of traditional bus routes in parts of outer London, 'demand-responsive' bus services are amongst the options that the Mayor is considering.

8. In parts of south Hillingdon such as West Drayton and Hayes, the Elizabeth line (Crossrail), due to be fully open by December 2019, coupled with a more comprehensive bus network makes 'good growth' a more realistic proposition. The MTS suggests that this can be achieved by converting low-density land-uses to high density mixed use development.

9. Car parking standards are a recurrent theme of the MTS and are presented as a being key to achieving 'good growth' and a mode shift away from the driver-only private car. This is a reasonable theme but, as the Council has already stressed in correspondence with the Mayor in July 2017, many residents in Hillingdon remain dependent upon the private car for some of their journeys. Policies to reduce this dependency must come with a significant improvement of and investment in alternatives, including a step-change in public transport provision and other sustainable modes. In order to achieve this, significant investment by the Mayor and TfL would be needed.

10. At the meeting of full Council on 6 July 2017, the Cabinet Member for Planning, Transportation and Recycling made the following statement, which was not opposed:

*'That Hillingdon Council acknowledges that car ownership is vital to our residents as a means of going about their daily business, especially if having to travel across the Borough north/south.*

*The Council therefore reaffirms its current planning policy relating to car parking spaces for new developments and will resist attempts to reduce this standard at the cost of higher density of future developments.'*

11. There is an expectation by the Mayor for an acceleration in car-free development in London's more accessible areas and new parking standards may be developed to ensure 'car-lite' developments.

12. Throughout London, there should be provision for electric vehicles, disabled drivers, car club cars and cycle parking. These are policies that Hillingdon has already adopted.

13. The Strategy expresses concern that a three-runway Heathrow would have severe noise and air quality impact and put undue strain on the local public transport and road networks; taking this into account the Strategy mentions that "*alternative airport expansion options should be considered*". On this point, the Mayor is broadly aligned with the Council's own views on the impact of a third runway.

14. A more conciliatory approach to airport expansion at Heathrow is presented in Policy 20 which makes it clear that "*The Mayor will continue to oppose expansion of Heathrow airport unless it can be shown that no new noise or air quality harm would result and the benefits of future regulatory and technology improvements would be fairly shared with affected communities. Any such expansion must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional demand alongside background growth*".

15. The Southern and Western rail access to Heathrow schemes are both specifically mentioned in the MTS together with a more general comment that acknowledges the important role of improvements to bus services, cycling and walking infrastructure serving the airport - particularly for staff journeys.

16. The MTS mentions that new Tube trains will be introduced from the mid-2020s on the Piccadilly line serving Eastcote, Ruislip Manor, Ruislip, Ickenham, Hillingdon and Uxbridge. These trains will be energy efficient, higher capacity, walk-through trains. These new trains will be complemented by signalling and track improvements to enable more frequent services and faster journey times, as well as improved accessibility, information and travelling environment. Frequency will increase to 33 trains per hour by the mid 2020s, allowing up to 57,000 additional journeys in the morning peak.

17. The MTS also mentions that TfL will optimise services in West London by running Piccadilly line services to Ealing Broadway instead of the District line. Despite pressure from the Council, there is no acknowledgement of the potential benefits of extending the Central Line to Uxbridge. This is regrettable as it has potential to vastly improve connectivity between Hillingdon and the rest of London and all of the economic benefits that this would offer.

18. The Night Tube service will be extended to parts of the London Overground and DLR networks and to parts of the Metropolitan line once modernisation programmes are complete in 2023. Night Bus services will be adjusted to complement night-time rail services. There is no specific mention of plans for new night buses in Hillingdon.

## **Transport for London, Interim Local Implementation Plan, Annual Spending Submission 2018/19**

19. Section 145 of the Greater London Authority Act 1999 requires each London borough to produce a LIP. This document sets out how the London boroughs will deliver better transport in their area in the context of the MTS. Hillingdon's first LIP covered the period 2011 /12 to 2013/14; the second LIP the Local Implementation Plan Delivery Plan was valid 2014/15 to 2016/17. The LIP is an important document as Section 159 of the same Act empowers TfL to provide funding to the Council to deliver safe, integrated and efficient transport in Hillingdon.

20. As part of the LIP process, each year TfL require that London Boroughs prepare and submit to TfL an Annual Spending Submission. The Annual Spending Submission sets out the proposed expenditure on transport projects and programmes on a project-by-project basis for the coming financial year. It includes details such as scheme title, scheme description, funding breakdown if joint funded, spend profile and details of how the scheme contributes to the MTS.

21. For this current financial year, 2017/18, an Interim LIP Annual Spending Submission was drafted and submitted to TfL. The Annual Spending Submission was considered as interim because the new Mayor of London had only just been elected, meaning that the new MTS had not yet been finalised. As the MTS is currently a draft being consulted upon, the LIP 2018/19 will again be interim. The draft MTS is expected to be adopted by the end of the 2017 calendar year allowing the third generation of LIPs to be produced for the three year period 2019/20 to 2021/22.

22. As shown in table 1 below, for the current financial year 2017/18, the submission of an Annual Spending Submission in October 2016 resulted in the grant award announcement in December 2016 worth nearly £6 million.

Table 1: 2017/18 TfL Grant Awarded

<b>Local Implementation Plan Programme heading</b>	<b>Grant Award 2017/18 £'000</b>
Corridors, Neighbourhoods and Supporting Measures	2,684
Principal Road Maintenance	1,114
Local Transport Funding	100
<b>Total LIP Funding</b>	<b>3,898</b>
<b>TFL Major Schemes</b>	
Hayes Town Centre Major Scheme	2,091
<b>TOTAL LIP and Major Scheme TFL Funding</b>	<b>5,989</b>

23. As approved by Cabinet in 2013, schemes under Corridors, Neighbourhoods and Supporting Measures fall under one of eight sub headings. The Cabinet Member for Planning, Transportation and Recycling has approved that the Council continues to use these eight headings in the 2018/19 Interim LIP Annual Spending Submission as they are unambiguous and clearly understood by the Council and TfL. Furthermore, the Cabinet Member approved that the total amount of funding received is divided amongst these eight headings in the same proportions as has been successfully delivered in previous years.

24. The Council's eight Annual Spending Submission headings are discussed below together with the relevant Policy in the MTS to which they relate shown in table 2. This demonstrates where Hillingdon's own local priorities align with the MTS. It is important that a connection is made between Hillingdon's own transport priorities and the MTS as Mayoral approval of an Annual Spending Submission is dependent on it being consistent with the MTS.

*1. Transport Interchange and Improving the Public Realm.* This programme heading is for town centre and local shopping parade public realm improvement schemes and measure to improve interchange between modes such as cycle parking at stations. This LIP programme is in accordance with MTS Policies 1 and 9;

*2. North South Corridors and Supporting Growth.* This programme heading includes schemes to support the local economy and the efficient movement of goods and people across the Borough. This LIP programme is in accordance with MTS Policies 17 and 21;

*3. School Travel Plan and Local Road Safety Schemes.* Schemes to improve road safety are included in this programme heading, as are road safety initiatives around schools, some of which may have been identified through the preparation of School Travel Plans. This LIP programme is in accordance with MTS Policy 1;

*4. Accessibility and Mobility.* This programme heading includes measures to improve the accessibility and mobility for people with disabilities for example bus stop accessibility, removal of street clutter, dropped kerbs and tactile paving. This LIP programme is in accordance with MTS Policies 1, 12, and 13;

*5. Parking Management Schemes.* This programme heading is for Parking Management Schemes and the Council's Stop and Shop initiative. This LIP programme is in accordance with MTS Policies 1, 3, 4 and 19;

*6. Public Footpath Improvements.* This programme heading encompasses public footpath improvements whether this is to improve pedestrian access to key services and facilities or walking purely for leisure and personal health. This LIP programme is in accordance with MTS Policies 1, 19 and 21;

*7. Transport Impacts.* Scheme to tackle poor air quality and noise caused by transport is grouped under this heading as are schemes to improve residential amenity. For example heavy goods vehicles may intrude into residential areas. This LIP programme is in accordance with MTS Policies 5, 6 and 20;

*8. Road Safety, Active Travel and Public Health.* This programme heading covers road safety education, training and publicity, walking and cycling. It also includes and initiatives that make the link between transport and public health such as Dial-a-Ride or supporting Community Transport. This LIP programme is in accordance with MTS Policy 2, 4, 8 and 21.

Table 2. MTS Policies Supported in the 2018/19 Annual Spending Submission

Programme Heading	
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	MTS Policies Supported			
1. Transport Interchange and Improving the Public Realm	Policy 1	Policy 9		
2. North South Corridors and Supporting Growth	Policy 17	Policy 21		
3. School Travel Plan and Local Road Safety Schemes	Policy 1			
4. Accessibility and Mobility	Policy 1	Policy 12	Policy 13	
5. Parking Management Schemes	Policy 1	Policy 3	Policy 4	Policy 19
6. Public Footpath Improvements	Policy 1	Policy 19	Policy 21	
7. Transport Impacts	Policy 5	Policy 6	Policy 20	
8. Road Safety, Active Travel and Public Health	Policy 2	Policy 4	Policy 18	Policy 21

#### Commenting on the MTS

25. As mentioned above, the GLA is inviting comments on the MTS - Draft for public consultation (2017). To make it as convenient as possible for people and stakeholder organisations to submit their views, online questionnaires are available at [www.tfl.gov.uk/mayors-transport-strategy](http://www.tfl.gov.uk/mayors-transport-strategy). Individuals and organisations such as London Borough of Hillingdon wishing to respond in greater detail are also invited to send a written submission by email or by post.

26. Because TfL awards London Boroughs a considerable amount of money each year to implement the MTS (for Hillingdon this equates to nearly £5 million this current financial year 2017/18), it is clearly in the Council's interest to work with the Mayor wherever it can to help deliver the MTS. However, because Hillingdon is an outer London borough with different characteristics to the rest of London, Hillingdon faces clear challenges putting some of the Mayor's policies into practice. Commenting on the MTS gives the Council an opportunity to highlight these difficulties and stress the need for additional resources if the Mayor's vision is to be achieved.

27. Authorisation is now sought for officers to draft the Council's responses on the online questionnaire answering each question in turn, taking full account of Hillingdon's position as an outer London authority where in some places services and facilities are sparsely distributed, trips are longer and public transport provision poor leading to a greater reliance of the private car.

28. To reinforce these points and highlight the unique challenges that Hillingdon faces, the Council should take the opportunity to respond in greater detail by submitting, on behalf of the Leader of the Council, a written response.

29. Such a response will emphasise that parts of the Borough has a greater dependency on the private car and this should be reflected in parking standards. Nevertheless, the economic, public health and environmental benefits of public transport, cycling and walking can still be



acknowledged and supported, but if Hillingdon is to achieve the mode split targets to which the Mayor aspires, then the Council needs further investment in public transport.

30. This amongst other projects this should include an extension of the Central Line, step free access at trains stations, a comprehensive network of night bus services and the reintroduction of a north-south bus services. It should also highlight that funding for initiatives such as Liveable Neighbourhoods will be vital for delivering the Mayor's vision of a modal shift away from the private car to public transport, walking and cycling. The same letter should repeat the Council's objection to airport expansion at Heathrow.

### Financial Implications

The 2018/19 Local Implementation Plan (LIP) Annual Spending Submission Interim Guidance issued by Transport for London offers interim guidance to cover a transitional financial year (2018/19) until the new Mayor's Transport Strategy (MTS) has been adopted. Boroughs will then be required to prepare new LIPs to come in to effect from April 2019.

The 2018/19 financial allocations set out within the Guidance document include the following indicative amounts for Hillingdon.

Table 3: 2018/19 Indicative Financial Allocations

	2018/19 Allocation	2017/18 Allocation	Difference
	£'000	£'000	£'000
Corridors & Neighbourhoods	2,780	2,684	96
Local Transport Fund	0	100	(100)
Principal Roads	938	1,114	(176)
<b>Total</b>	<b>3,718</b>	<b>3,898</b>	<b>(180)</b>

An amount of £2,780k has been allocated for Corridors, Neighbourhoods and Supporting Measures, from an overall London wide allocation of £73,800k. This represents an increase of £96k from the amount awarded for 2017/18. However, this is offset by the removal of the annual £100k Local Transport Fund allocation which the Council was able to spend on transport projects of its own choosing. There are no existing plans for use of the Local Transport Fund beyond 2017/18 and transport investment will be maintained in 2018/19 through the increased Corridors & Neighbourhoods allocation.

For Principal Roads, the 2018/19 allocation is £938k from a London wide allocation of £20,000k. This is a reduction of £176k from the amount awarded for 2017/18. The Guidance states that the funding is allocated on the basis of need as informed by condition surveys.

The Guidance states that the financial information set out is correct at the time of publication (May 2017) but is subject to cost efficiency review under TfL's internal business planning practices.

The Major Schemes funding programme will be replaced from 2018/19 by the Liveable Neighbourhoods programme. No new Major Scheme submissions will be accepted on to the programme though existing schemes such as Hayes Town Centre will be funded to completion.

The submission is required to set out proposals under the Corridor, Neighbourhood & Supporting Measures and Major Schemes / Liveable Neighbourhood programmes, providing details of funding sources other than LIP such as council capital and revenue funding, developer funding (Section 106) or government grants, if applicable.

## RESIDENT BENEFIT & CONSULTATION

### **The benefit or impact upon Hillingdon residents, service users and communities?**

By submitting to TfL the Interim Local Implementation Plan Annual Spending Submission 2018/19 the Council can realistically expect to receive funding from TfL for investment in local transport projects and programmes. These projects and programmes include town centre enhancements, transport interchange, road safety, mobility and accessibility, parking management, footpaths and public health. This investment will benefit Hillingdon residents, service users and community by supporting the local economy, improving public health and protecting the environment.

### **Consultation carried out or required**

Full consultation is carried out as part of the implementation of each scheme as appropriate.

## CORPORATE CONSIDERATIONS

### **Strategic Finance**

Strategic Finance has reviewed this report and notes that the Council's indicative TfL LIP funding for 2018/19 will result in a reduction of £180k from 2017/18, however, this figure is subject to review. The recommendations in this report will enable the Council to secure this external funding as well as responding to the Mayor's Transport Strategy through an online questionnaire.

### **Legal**

The Borough Solicitor confirms that there are no specific legal implications arising from this report.

## BACKGROUND PAPERS

NIL

## Appendix 1. MTS Policies Supported in the 2018/19 Hillingdon Annual Spending Submission

### Policy 1

The Mayor, through TfL and the boroughs, and working with other transport providers, will seek to make London a city where people choose to walk and cycle more often by improving street environments, making it easier for everyone to get around on foot and by bike, and promoting the benefits of active travel. The Mayor's aim is that, by 2041, all Londoners do at least the 20 minutes of active travel they need to stay healthy each day.

### Policy 2

The Mayor, through TfL, the boroughs, police and enforcement authorities, will adopt Vision Zero for road danger in London. The Mayor's aim is for no one to be killed in or by a London bus by 2030, and for all deaths and serious injuries from road collisions to be eliminated from London's streets by 2041.

### Policy 3

The Mayor, through TfL and the police, will seek to ensure that crime and the fear of crime remain low on London's streets and transport system through designing secure environments and by providing dedicated specialist and integrated policing for London's transport system.

### Policy 4

The Mayor, through TfL and the boroughs, will prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic.

### Policy 5

The Mayor, through TfL and working with the boroughs, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures will include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/levies, responsible procurement, the making of traffic restrictions

### Policy 6

The Mayor, through TfL and the boroughs, and working with other transport providers, will seek to make London's transport network zero carbon by 2050, which will also deliver further improvements in air quality, by transforming London's streets and transport infrastructure so as to enable zero emission operation, and by supporting and accelerating the uptake of ultra-low

### Policy 8

The Mayor, through TfL and the boroughs, and working with other transport and infrastructure providers, will seek to ensure that London's transport is resilient to the impacts of severe weather and climate change, so that services can respond effectively to extreme weather events while continuing to operate safely, reliably and with a good level of passenger comfort.

**Policy 9**

The Mayor, through TfL and the boroughs, will use the Healthy Streets Approach to direct complementary public transport and street improvements to provide an attractive whole journey experience that will facilitate mode shift away from the car.

**Policy 12**

The Mayor, through TfL and the boroughs, will seek to enhance London's streets and public transport network so as to enable all Londoners, including disabled and older people, to travel spontaneously and independently, making the transport system navigable and accessible to all.

**Policy 13**

The Mayor, through TfL and the boroughs, will transform the quality of bus services so that they offer faster, more reliable, accessible, comfortable and convenient travel by public transport, while being integrated with, and complementing, the rail and Tube networks.

**Policy 17**

The Mayor, through TfL and the boroughs, Network Rail and train operating companies, will seek the development of London's public transport services to support the growth of the night-time economy.

**Policy 19**

The Mayor, through TfL and the boroughs, will ensure that new homes and jobs in London are delivered in line with the transport principles of 'good growth' for current and future Londoners by using transport to:

- Create high-density, mixed-use places, and
- Unlock growth potential in underdeveloped parts of the city.

**Policy 20**

The Mayor will continue to oppose expansion of Heathrow airport unless it can be shown that no new noise or air quality harm would result and the benefits of future regulatory and technology improvements would be fairly shared with affected communities. Any such expansion must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional demand alongside background growth.

**Policy 21**

The Mayor, through TfL, will manage new transport services in London so that they support the Healthy Streets Approach, guided by the following principles:

- a) Supporting mode shift away from car travel: new transport services should not encourage more car journeys, especially where there are good walking, cycling or public transport options.
- b) Complementing the public transport system: new services should help more people who would otherwise complete their journey by car to access the public transport network, while not reducing walking and cycling to and from stops and stations. They should also provide a means of travel in areas where public transport connectivity is currently poor (especially in outer London).

- c) Opening travel to all: new services should be accessible to all Londoners and should not contribute to the creation of social, economic or digital divides in which some Londoners would have better travel options than others.
- d) Cleaning London's air: new services should prioritise ultra-low and zero emission vehicles to reduce emissions of carbon dioxide, nitrogen oxides and particulate matter in London and enable faster switching to cleaner technologies.
- e) Creating a safe, attractive environment on our streets: new services and technology should help create a safer, quieter and more pleasant environment on London's streets, where it is more attractive to walk or cycle, and should not lead to existing active trips being made by non-active modes. There must always be an emphasis on the safety of passengers, pedestrians, cyclists and other road users.
- f) Using space efficiently: new services must make efficient use of road and kerb space, be appropriate for the area of London in which they operate, and share data where possible to enable improved monitoring, operating and planning of the transport network.