



The Alliance of British Drivers

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The Mayor of London

Via Email: consultations@tfl.gov.uk

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Response to the Consultation on the Mayor's Transport Strategy.

Dear Sir,

Below is the formal response from the Alliance of British Drivers to the public consultation on the Mayor's Transport Strategy. The Alliance of British Drivers (ABD) represents road users who use private cars, taxis, PHVs, and goods vehicles nationwide.

We have answered the detail questions in the consultation document first, with more general comments at the end. Our answers are below (in red):

CONSULTATION QUESTIONS ON CHAPTER 1 – THE CHALLENGE

1) The challenges.

Answer: It states on page 11 that "London's streets should be for active travel and social interaction...". This is nonsense. Streets are built and maintained at great public expense to provide an efficient and cost effective transport system for people and goods. If people need exercise, or social interaction, there are many other ways they can obtain that without taking up scarce road space. The priority should be on providing a transport network in London that meets the business needs and preferences of the public. It should not be distorted to meet other objectives.

The Mayor says "People remain dependent on their cars because street environments are not designed to promote walking and cycling", or "because overcrowded or unreliable services make public transport unattractive" (page 5 of the Exec. Summary). The old red-herring about "car-dependency" is introduced when it is simply a rational choice of informed transport users. People prefer private cars for many trips because you can keep out of the cold and rain, you don't have to wait for the next bus or rely on anyone else. You are your own master and can travel immediately to wherever you want if you have a car.

You will never be stranded because of a cancelled service, nor be vulnerable to train operations staff going on strike. The Mayor's proposals don't tackle those issues, and even if he accepts that public transport should be improved, does he have the funds to do it? That question is not answered.

The Mayor says that the growth in the population of London to 10.5 million in 25 years' time requires the way people move around "to be re-examined". That may be so, but have the people been asked whether they support such growth or how they would like to see transport improved in London? Basically no. The Mayor should consider how it might be possible to restrain the growth in the population of London, or even reduce it, so as to improve the quality of the transport system.

CONSULTATION QUESTIONS ON CHAPTER 2 – THE VISION

2) The aim is that, by 2041, 80 per cent 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?

Answer: We oppose this vision. It is simply an attack on private cars, dressed up under the guise of promoting health. We see no benefit in promoting the use of public transport when it is already overcrowded (and the Mayor's policies will not fix that), or promoting more cycling which is both a dangerous mode of transport and unsuitable for a very large proportion of the population, or for many trips.

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; • 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; • for all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London's entire transport system to be zero emission by 2050; • by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day; • to open Crossrail 2 by 2033; • to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor; • to improve the overall accessibility of the transport...; • to apply the principles of good growth. To what extent do you agree or disagree with the aims set out in this chapter?

Answer: Changing the transport mix is something that needs to be justified in terms of the cost/benefit of doing so, and the desires of the population of London. Nowhere in the Mayor's Transport Strategy is there any justification provided on either grounds for doing so.

Promoting "active travel" may be beneficial, but there is little evidence that it will have a major impact on public health. Forcing people to walk to the nearest public transport point will not normally be sufficient to have any impact on health.

We are opposed to the statement "growth is good for London" (page 24 of the document). Rapid growth in population has a negative impact when the provision of new transport facilities often grows slowly in response.

In addition, it is very difficult to improve the road network in London which is required to service the increased goods deliveries required by that growth, and the rise in internet retail sales.

Indeed on page 27 it says "a capacity increase of about 80 percent is required to tackle crowding on today's services and cater for growth between now and 2041 in central London". But there is no obvious solution proposed in the Mayor's Transport Strategy to meet that demand. All we have is a response that there "must be a steady reduction in private car use". How this will assist is not clear – indeed if those private car users move to public transport, it will make overcrowding on public transport even worse.

Car use is already very low in central London, and very few people "commute" via car. The attack on private cars just looks like kowtowing to the anti-car factions and the politics of envy.

On page 32 it says "Improvements to walking and cycling environments will enable many of the trips currently made by car to be made by foot or by bike". Where is the evidence provided for this statement? There is none. In outer London, where car use is more prevalent, the distances and hilly terrain prejudice extensive use of walking and cycling. Plus as the population ages, the use of cycling declines.

In summary, we oppose the vision of having 80% of Londoners trips being made on foot, by cycle or using public transport.

As regards the individual "aims", our answers are as follows:

- The aim to have all Londoners undertake 20 minutes of "active travel" is unreasonable. We support the encouragement of healthy life styles and physical activity, but this should be developed by education – not forcing travel modes onto people.
- Improving the safety of buses should be a focus of road safety work, but eliminating all deaths may be difficult to achieve if one is aware of the nature of many of such accidents.
- Removing all deaths and serious injuries from road collisions is not only likely to be very difficult but financially may be too expensive, i.e. not justified on any cost/benefit analysis. For example, how does one stop pedestrians from walking in front of vehicles? Only complete separation of pedestrian footpaths from roads would achieve that which is an impossible objective. Adopting such unrealistic objectives is likely to be counterproductive. Better to have achievable and realistic targets.
- Zero emission buses we support, but making the entire transport system to be zero emission by 2040 would be very expensive. In addition, bearing in mind that many private cars and goods vehicles travel into London from other parts of the country, or other countries, it would impose an unnecessary burden on them to comply. Emissions are already being substantially reduced, and that will continue. It is unnecessary to go for a zero emission transport system, and extremely expensive to do so. It is also irrational when there is no similar objective to have a zero emission target for domestic or office heating, for industrial activities, etc.

- We are opposed to the Mayor taking over all suburban rail services. It is not clear how that will improve those services or better support the needs of those using those services.

CONSULTATION QUESTIONS ON 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?

Answer: It is no doubt the case that improving the street environment might encourage people to walk and cycle to some extent. However to suggest that there will be a wholesale change in travel modes as a result is being grossly optimistic. We note that statement that "one quarter of car trips could potentially be walked and two thirds could potentially be cycled" but not only do we doubt the credibility of those figures, but also that it would be possible to achieve much modal shift anywhere near those figures. Modal shift has been encouraged for many years, but with very little impact in outer London. In central London, the increase in cycling has been driven by very expensive public transport fares plus overcrowding and the general promotion of cycling in the national media and cycle racing among the younger age segment of the population. It has had negligible impact on the middle to older segments. Similarly, the increase in walking in central London has not been great, and any change has been driven by public transport costs and overcrowding.

The comments on walking and cycling for the disabled on page 42 are also extremely misconceived.

The view that some trips could change mode, does not mean they will do so, or that the public will wish to change their mode. TfL should not be forcing what they imagine to be healthy life styles on the public against their wishes.

The wish to expand cycling in outer London simply ignores the realities of cycling and its attractiveness (or lack of) to those living in outer London.

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?

Answer: Although we support the objective of having targets for reducing road casualties, these should be realistic and financially rational targets. A target of zero personal injury accidents (as promoted by "Vision Zero") is not sensible.

We also oppose a general reduction in traffic speeds (Proposal 9 a). There is no obvious correlation between average traffic speeds and accidents. Reducing traffic speeds has enormous financial costs in terms of increased journey times, and is extremely frustrating for drivers who do not recognise unrealistic speed limits as being of any road safety benefit.

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).

Answer: No comment.

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 for essential traffic, including freight (see pages 70 to 78).

Answer: We are opposed to any discrimination between different types of road users. There is little justification for bus priority measures. Bus lanes simply often reduce the total capacity of the road in terms of people or goods movements, and there is no obvious reason why bus passengers should be allowed to jump queues of other road users.

Otherwise the measures suggested to reduce congestion are not likely to be effective. Congestion has been increasing, while vehicles and trips have been falling. So clearly the problem is that road space has been removed, or roads redesigned in a negative way so that traffic flow is impeded. More traffic lights and removal of gyratory roads and roundabouts have been one cause.

We are opposed to the policy to reduce car use and the reduction in car parking spaces (Proposal 17). The Sunday Times has shown that one cause of congestion is vehicles having to travel more to scout for a parking space.

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

Answer: We note the comments on the impact of the Congestion Charge (tax), on page 78 but regrettably the information provided is incorrect. The Congestion Charge had a negligible impact on traffic congestion. Traffic volumes have fallen in central London, but congestion has worsened.

See <http://www.freedomfordrivers.org/congestion.htm> for the evidence and for a proper analysis of the impact of the Congestion Charge – in summary an enormously expensive system that did not meet its stated objectives at all. It's just become a new tax on Londoners.

As regards Proposal 18, suggesting the Mayor should keep road user charging "under review", please note we are opposed to any extension of the central Congestion Charge zone (indeed we think it should be removed), or any more general road pricing scheme. We are therefore opposed to Proposal 19. The Mayor was elected on a manifesto of not extending the Congestion Charge. It should therefore not be extended in terms of geographical reach, hours of charging or increases in rates.

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

Answer: We are opposed to Proposals 20 and 21 which would give local boroughs the ability to introduce their own road pricing schemes or “demand management”. This could lead to a horribly complex patchwork of local schemes.

We are also opposed to workplace parking levies, higher parking charges for the most polluting vehicles (a gesture which will be totally ineffective in reducing pollution), vehicle-free zones, road closures, car free days and other similar measures proposed on pages 84-85.

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).

Answer: In general although we support the objective to reduce emissions from transport in London, we suggest the proposals are excessive in scope, and will put an enormous financial burden on many Londoners. Vehicle emissions are already falling substantially due to national policies and regulations, and will continue to do so over the next few years.

The proposals suggested are unjustified in terms of the cost/benefit and are simply an attack on road vehicles of any kinds in many cases. We are therefore strongly opposed to Policy 5 which includes “road charging”, “the imposition of parking charges/levies” and “traffic restrictions”.

We are also opposed to Proposal 22 which includes the imposition of a central London ULEZ in 2019, and its expansion London-wide by 2020/2021. There is no rational justification for these measures in terms of a cost/benefit analysis (no such information is provided and requests for the costs of the scheme have been evaded).

We particularly object to the imposition of draconian measures on private cars when the vast majority of vehicle emissions come from goods vehicles, buses and taxis.

It is possible to introduce alternative measures which would substantially reduce emissions without the financial penalties that the existing proposals will impose on Londoners (and visitors from other parts of the country). For example, speed humps have been shown to increase traffic emissions substantially and yet TfL will still finance road safety proposals that include them. The Mayor should adopt a policy of removing them and replacing them with other road safety measures.

We are also opposed to Proposal 24 (to permit restrictions on vehicles in periods of high air pollution). This could result in a journey having to be interrupted at some unforeseen point, or a return journey not being allowable. This is just another attack on the flexibility, and hence attractiveness of private transport.

We are opposed to Policy 6, which gives an objective of a zero emission transport system by 2050. This would be very difficult to achieve for goods vehicles, and it’s both unnecessary and uneconomic to force all vehicles to be electric which would be the only way to meet that objective. However we support Proposal 27 as regards the bus fleet and Proposal 28 for taxis. But Proposal 29 for PHVs is too onerous and unnecessary.

We are opposed to Proposal 33 which would permit local boroughs to introduce local zero emission zones. This would introduce a horrendously complex patchwork of restrictions and reduce the ease of use and viability of the road network enormously.

We are supportive of other proposals to tackle non-road transport emission sources as they are a very substantial proportion of total emissions and it is irrational to impose draconian and very expensive measures on road transport and do little about other emission sources.

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).

Answer: We support the Mayor's objectives to make London resilient to the impact of any changes in climate and to reduce the impact of noise and vibration on London's residents. But the latter can be done without the need for "mode" shift. The Mayor should encourage the use of quieter road surfaces, and the adoption of quieter vehicles – particularly where he has some control such as over taxis and buses.

Removal of road humps would also reduce noise and vibration as well as air pollution.

We also support proposal 41 to increase the number of trees planted on the TLRN network and borough roads. This can contribute positively to road safety.

CONSULTATION QUESTIONS ON 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).

Answer: Our comment is that these are fine ambitions in general but the proposals are un-costed so it is difficult to comment on them. But enhancing public transport use should not be to the detriment of private transport use, and would benefit from an integrated transport approach that factors in the wants and needs of those who ride and drive motor vehicles.

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).

Answer: The emphasis is on "affordability", i.e. low or zero cost fares when the objective should be to reduce the massive subsidies now in place for public transport – particularly buses.

Such subsidies just encourages people to travel when a more realistic fare directly related to the cost of provision would ensure that only travel that was justified economically to the user would take place. Likewise the Freedom Pass system should be reformed because it is just a general subsidy at present – and is even given to wealthy persons in the population. These excessive subsidies end up falling as a tax on London residents as the boroughs have to support the Freedom Pass for example.

Transport for London should commission a review of its expenditure and take an axe to waste, for instance considering if much of its advertising is necessary or ending the waste of money on gesture politics such as senseless ULEZ expansion, 20mph zones, traffic calming, etc. The Mayor should not pay grants or subscriptions to pressure groups that lobby it to avoid charges of bias.

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).

Answer: No comments.

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).

Answer: We support Proposal 53 to redistribute bus service volumes as it is clear that many buses operate with very low passenger loads in central London. However, it is important to reduce the cost of the bus network.

We oppose Proposal 54 to increase the number of bus lanes and their operating times – our reasons are given above.

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).

Answer: In general we support the proposals to improve rail services. However we oppose the takeover of suburban rail services by the Mayor/TfL – neither are publicly accountable at present.

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).

Answer: No comments.

CONSULTATION QUESTIONS ON 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).

Answer: As regards proposal 76, we oppose restrictions on car parking provision or car free developments. These just lead to obstructive parking on surrounding roads. Housing developers should not be constrained by political objectives – they should be able to build properties that people actually want to buy.

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).

Answer: As regards Proposal 88, we fully support construction of the Silvertown Tunnel, but we oppose charging for use of that and the Blackwall Tunnel. We also support Proposal 90 for additional road river crossings which are urgently needed, in addition to the Silvertown Tunnel. As regards proposal 93 for decking over the A13 we support that and would also like to see other proposals for decking and tunnels to relieve congestion on major routes brought forward.

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

Answer: We support the Mayor's opposition to the expansion of London Heathrow airport – there are better and more cost-effective alternatives.

CONSULTATION QUESTIONS ON 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 as connected and autonomous vehicles (see pages 258 to 262).

Answer: We support Proposal 97 re information and payments platforms. But we object to Policy 21 and its support of mode shift. Have the transport users, and in particular road users, ever been consulted on their desire for mode shift? The answer is no.

The law on consultations requires consultees to be properly reached and informed, with a higher standard of engagement if proposals would withdraw a benefit from them. The MTS consultation has been seriously under-publicised and much of the London public is even unaware of it happening, let alone its more controversial proposals. It therefore has no legitimacy in seeking to remove entitlements to road use, parking etc. and any attempts to do so might result in legal action.

We also oppose Proposal 87 where it is suggested that access to kerb space might be used as a "demand management" measure, i.e. effectively restricting kerbside parking.

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).

Answer: We are strongly opposed to the Mayor taking additional powers to fund the transport system. The document suggests that motorists are “being subsidised by public transport” (page 265). This is a gross distortion of the truth. Motorists pay many times over for the roads they use via VED, fuel duties, VAT and other taxes. Even fairly pricing in their environmental impact does not tilt that balance to be negative.

In reality it is public transport that is massively subsidised in London out of taxes paid by the public. The prevalence of such subsidies results in a very inefficient and expensive transport network, and distorts the whole economy – for example it results in a concentration of jobs in central London when a more dispersed spread would make more economic sense.

Giving the Mayor powers to raise taxes from motorists is simply wrong and is unjustified by the facts. See this post on the ABD London Blog for more analysis: <https://abdlondon.wordpress.com/2017/07/27/transport-costs-in-london-a-begging-letter-from-the-mayor/>

Proposal 102, which includes the desire for additional taxes, and control over Vehicle Excise Duty are simply unprincipled attacks on private car usage.

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).

Answer: We oppose the imposition of the Mayor’s Transport Strategy in local boroughs by the use of Local Implementation Plans and the close supervision of TfL to ensure implementation as they desire it. This is taking all local control away from the boroughs and undermining democracy. Only the local boroughs have democratic representation while TfL has none. The local boroughs also have much better knowledge of local traffic and transport problems or needs.

Currently we get lunatic schemes such as the Cycle Superhighway along the Embankment taken forward by the incumbent Mayor and bureaucrats in TfL despite widespread public opposition – with disastrous results in terms of worse traffic congestion on a major part of the road network.

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

Answer: See below.

Conclusion

The Mayor’s Transport Strategy is very disappointing as regards one aspect – namely the lack of any significant proposals to improve the road transport network in London. **In summary, the Mayor’s Transport Strategy contains not only a number of glaring defects, but is yet another missed opportunity to develop an integrated transport strategy. London has needed an improved road transport network for many years, but there is nothing in the document to support that. It is mainly about attacks on private vehicle owners and users (including PHVs).**

The only way the Mayor seems to consider that congestion can be reduced is by “demand management”, i.e. forcing people out of their cars by pricing and parking restrictions. But private cars are a relatively small part of the overall traffic load in central London (where most of the congestion arises) and the steps to reduce other vehicles are not likely to have an impact. There is no recognition of the “unsatisfied demand for road space” which was the prime cause of the failure of the Congestion Charge system. Removing the demand for road space from some, will simply cause it to be filled by others who are willing to pay more, including businesses who can pass on the extra cost for deliveries to their customers.

There seems to be little consideration of the basic problem – a rapidly expanding population and business activity in London with transport facilities and the road network being unable to be developed sufficiently quickly in response. The Mayor should look at a programme to disperse the population and businesses to other parts of the UK, as happened effectively in the late 1900s, or look at how the growth in population could be otherwise reduced.

Of particular concern is the lack of provision of supporting financial information on the Mayor’s Proposals, or any cost/benefit analysis to enable informed responses and comments.

TfL and the Mayor seem to be living in world where costs and economic benefit are of no consequence of late.

In summary, a disappointing document which fails to have a sound strategic vision.

Yours sincerely

Roger Lawson
Campaign Director