



The Association of British Drivers

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Mr Boris Johnson
Mayor of London
(MTS Statement of Intent)
City Hall
The Queen's Walk
London
SE1 2AA

Via email: mts@london.gov.uk

9 July 2009

Dear Mr Johnson,

The following are our comments on your document entitled "Mayor's Transport Strategy – Statement of Intent", and our responses to the specific questions posed:

General Comments:

1. We welcome the initiatives outlined in Chapter One to develop the outer London transport network, to link transport and planning more closely, to enable more local borough involvement in transport decisions and to deliver better value for money. It is certainly the case that in recent years under the regime of your predecessor there was an over-concentration on central London facilities and little attention to the economic consequences of the adopted policies.

2. Chapter 2 highlights the problem in London of long commuting times imposed on Londoners and a more "effective balance of the location of population and employment across the city" is certainly needed. As regards the comments on climate change and CO2 emissions in that section, we would question whether there is any such scientific evidence as claimed to support what might be enormously expensive and ineffective measures to control levels of such emissions. We also note that there is comment on the need for measures to support the 2012 Olympics but we must point out these events will only be taking place over a few weeks and apart from minimizing the impact on Londoners, of whom the vast majority will not be involved in any way with the Games, any expenditure on improved transport links must provide some long term benefits otherwise they will be exceedingly expensive and essentially uneconomic.

3. We welcome the initiatives on a sub-regional strategy outlined in Chapter 3 and we would suggest that this should involve the development of not just appropriate new public transport networks, but also an improved road network. London has been crying out for an improved road network for many years, which has tended to be obstructed by both local boroughs in the past, and misguided central policies.

4. We welcome the initiatives in Chapter 4 on “smoothing traffic flows” but as regards the comments under that heading about Congestion Charging we wish to make the following points:

a – We fully support the removal of the Western Extension, but we would also like to see the main Congestion Charge scheme removed. It has little benefit, several negative aspects and is enormously expensive to operate.

b - We oppose all road user charging as a mirage which can have no real benefit, and therefore are not in favour of even limited schemes of this nature.

We support the promotion of cycling and walking in Chapter 3 but the proposal to replace “subways and footbridges with surface crossings” mentioned therein is not always a wise one. Such changes can impede traffic flows and do not always improve safety for pedestrians. They should not be applied in a dogmatic manner.

As regards the comments on “improving air quality” we fully recognize the need for improvements in London air quality and look forward to the forthcoming MAQS. We also welcome the initiatives to increase the use of electric vehicles although we would like to see a clearer economic justification for large expenditure on this and also some clearer objectives in terms of emission levels. It would seem to us that persuading car drivers to switch to electric vehicles may be beneficial but that unless similar initiatives are applied to buses, taxis, LGVs and HGVs the benefit will be swamped by those types of vehicles. Indeed it might be simpler to tackle the problem of diesel engine use in those vehicles which is now recognised as a major source of pollutants.

The initiatives for “hybrid” buses may be beneficial but much larger numbers will be required if they are to have a significant impact.

Incidentally the figures given on page 53 of your document for CO2 emissions of various transport modes are we believe wrong. These figures seem to ignore the average passenger load per vehicle or are not comparing like with like (i.e. the average bus with the average car). There is very little difference between emissions per passenger of buses and cars on the data available from some sources, and therefore little benefit to be gained from a change of transport modes.

As regards the comments on page 61 we certainly approve of the objective of “improving the layout and design of streets”. However “removing dysfunctional gyratories” and “one-way streets” is a blanket proposition which could have major negative impacts on road transport. One only has to look at the congestion that has been created by the removal of the Aldgate gyratory system to see how damaging this can be. Such arrangements were often put in place with the intention of improving traffic flows and that was generally achieved.

The fact that they were often poorly designed or did not properly recognise the needs of pedestrians or cyclists is something that is regrettable but we now understand better how to design such schemes to limit their negative environmental impact.

As regards the answers to the specific Consultation Questions, these are as follows:

Question 1. None that come to mind.

Question 2. Don't understand the question. It refers to Figure 1 in Chapter 3 but Figure 1 does not seem to relate to "delivering a sustainable transport system".

Question 3. The MTS should focus on strategic, London-wide initiatives and major transport networks. But in the past there was effective dictation by TfL to the local boroughs on the details of their plans and no flexibility to meet local borough needs. It was excessively centralized in respect of local road safety schemes and in many other areas. The question suggests "consistent outcomes" are needed, but consistency of implementation is not needed so long as objectives are met. There should be less "dictation" and more support and advice on best practice.

Question 4a. As indicated above, a greater focus on economic development in Outer London does require that more attention is paid to development of a consistent strategic road network in Outer London. South London is particularly badly served in that regards with the "south circular" being a joke which only ignorant road users from outside London would ever consider using. We need more orbital routes and more reliable and higher volume routes between regional centres. This applies to both road transport networks for private vehicles and for buses, but also in respect of surface rail.

Question 4b. There is no need to "manage demand" and certainly using road pricing to try to achieve it will not work. We are absolutely opposed to any such proposals. Interfering in the natural economic structure based on individual transport choices is surely likely to be uneconomic and lead to dysfunctional and uneconomic transport systems.

Question 4c. New transport capacity should be determined primarily by the economic benefits or otherwise of specific proposals, but also by their impact on other transport modes. So for example, we are generally opposed to new tram schemes which have been demonstrated repeatedly to be uneconomic (in the sense that the users don't seem willing to pay for them) and which impose negative benefits on other road users if run "on-street". There should be no presumption against increasing road capacity if that is the most economic way of improving transport capability.

Question 4d. We certainly support the promotion of new technologies in transport and the Mayor can have a significant influence on this by his regulatory powers over buses and taxis for example. He can also influence the use of public service vehicles more generally and can encourage the development of infrastructure to support electric vehicle use. However, we also suggest that policies and expenditure in this area must be consistent with not raising the burden of taxation on Londoners or discriminating against poorer sections of the community who may be less able to change their vehicles rapidly.

Question 5. We prefer Option 2, because it will be cheaper, will reduce journey times and will provide a more “balanced and dispersed” growth capability.

Question 6. See comments in first section of this response. As regards Question 6c, we suggest that the policies on road safety are rather ill defined and we would like to see a more positive commitment to develop a consistent and coherent strategy to improve road safety.

Yours sincerely

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About The Association of British Drivers (ABD)

The ABD is the leading independent organisation which represents the interests of private motorists in the United Kingdom. We campaign to protect the rights of individual road users and believe that road transport is a beneficial and essential element in the UK transport infrastructure. We oppose excessive taxation of motorists and are against tolls and road usage charging. We also campaign for more enlightened road safety policies. The Association is a “not for profit” voluntary organisation which is financially supported primarily by its individual members. More information on the ABD is available from our web sites at www.freedomfordrivers.org and www.abd.org.uk

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