

**Consultation on the (draft) Mayor of London Transport Strategy:
Response from the Association of British Drivers
January 2010
(By email to mts@london.gov.uk)**

1. GENERAL COMMENTS

If the aim of the Strategy is to improve ‘transport opportunities’ for everyone and to promote road user satisfaction, then it unfortunately falls short in its proposals towards those who need to drive. This is a serious shortcoming; for instance, Transport for London has previously acknowledged that the car is the dominant mode of travel in outer London.

There are some positive-sounding measures, but these do not contain enough detail to allow for proper comment.

Perhaps the main concern is that the Mayor’s Transport Strategy is an important document with a twenty year horizon, and the consultation has been under-publicised.

The Association of British Drivers (ABD) is also concerned at the 21 page consultation handout, ‘Help shape London’s future’. This is not an even-handed document. At the end, readers are invited to tick boxes. This leads readers to Transport for London’s preferred answers.

ABD particularly objects to an item on page 21, where readers are asked to agree with a loaded statement that ‘it may be necessary to consider a *fair* system of demand management’, such as ‘road user charging’. There is no objective discussion as to whether road user charging might or might not be fair; it is just taken as read.

ABD’s comments are broken down in topic headings, but should be seen of part of a holistic whole. Where page numbers are quoted below, these relate to the PDF version of the full draft Mayor’s Transport Strategy document.

2. ROAD USER CHARGING / DEMAND MANAGEMENT / PARKING

(p231) The Mayor, through TFL, and working with the London boroughs, DFT, Highways Agency, and other stakeholders, will keep under review the option of road user charging and/or regulatory demand management measures to influence a shift to more CO₂ efficient private and commercial road vehicles, and to lower carbon travel options such as walking, cycling and public transport.

ABD feels that which mode of transport is used should be a matter of individual choice, based on personal circumstances. If there is demand for car use, Transport for London should cater for drivers as customers, not least as drivers pay five times over for both for their carbon emissions and the paltry investment in roads.

Given the net contribution of taxes and the social and economic benefits provided by the car, public servants should not seek to penalise the car user. In current economic conditions, drivers need little incentive to switch to cheaper or more fuel-effective forms of transport.

Transport for London's energies would be better spent getting existing modes of transport to work – for instance, tackling train service reliability and anti-social behaviour that makes bus use unpleasant.

(p247) Parking and the extended use of charging is a possible tool which may be used to better manage demand.... The Mayor, through TFL, and working with the London boroughs, car park operators and other stakeholders, will encourage implementation of pricing differentials based on vehicle emissions, including banded residents' parking permits and other on and off-street parking charges including incentives for electric vehicles.

See above. Parked vehicles do not typically generate 'carbon emissions' as they are stationary! The effects of man-made carbon emissions on the climate are far from proven, and the 'case' for action has been based on computer models designed to give a particular result! After the 'Climategate' scandal concerning the Hadley Climate Research Unit, public scepticism is markedly rising.

Such measures would not enjoy public confidence, and would bring the Mayor's Office into disrepute. The Richmond and Twickenham Times recently noted 92% of the borough's residents responding were against emission-based charges.

In its 2009 report on road user charges (p30), the Parliamentary transport committee, TRANSCOM, expressed concern at the idea of basing service charges such as parking charges on grounds unrelated to the service..

<http://www.publications.parliament.uk/pa/cm200809/cmselect/cmtran/103/10306.htm#a19>

Electric vehicle technology is unproven on a large scale and there are doubts as to whether the grid can support this, unless charging is done at night. There are also doubts as to the capacity of the London grid, not least as the UK is set to have power cuts after 2013 as generating capacity is run down at end-of-life and to meet EU requirements. Electric vehicles tend to be very expensive and there are questions over their range and the supply of lithium for batteries.

(p236) As a consequence, different areas of London require different policy interventions. Proposals for central London will inevitably focus on tackling congestion, increasing the capacity of the rail network, encouraging walking and cycling, and managing demand...

(p253) Proposal 129: ...The Mayor will also consider imposing charges or tolls to support specific infrastructure improvements, such as river crossings.

'Help shape London's future' hints that 'increasing demand for travel' might be a significant problem for London. A number of studies show that demand for car travel in London has actually been tailing off – this was a trend even before the Congestion Charge was brought in.

Drivers do not deserve to be charged for the privilege of driving in congestion. Particularly where this is caused or aggravated by measures such as the authorities removing road space (e.g. for under-used bus lanes, or unnecessarily widening pavements).

The fiasco of removing two road lanes around Trafalgar Square is well documented; in spite of assurances that all would be well, this aggravated congestion for miles around.

To address congestion, Transport for London and the boroughs should investigate reversing measures that gratuitously reduce road speed or remove road space. The removal of parking spaces - resulting from the previous Mayor's approach to transport - was reported as a factor in congestion, as vehicles have to drive further looking for a space.

The Mayor's Transport Strategy should set the lead to transport authorities by enabling them to investigate innovative measures for parking relief. For instance, they should be encouraged to commandeer derelict space to provide parking spaces and to investigate the provision of underground parking, as in other European countries.

It is an anomaly that parking provision for new commercial developments in outer London has been made slightly easier, but a low ratio (1-1.5 spaces for a 3 bedroom property) is still the norm for new residential developments.

In the UK, drivers have paid several times over for limited investment in road facilities – over £400 billion since 1997. They have, in all fairness, paid for future investment in advance. It is also relevant to note that London pays more than its fair share in taxes 'per head' to the Exchequer, and should get more of its own money back.

How about 'managing demand' by investing more of drivers' taxes in what they need to park and get around without hindrance?

3. WESTERN EXTENSION ZONE / CONGESTION CHARGE

(p152) Proposal 128 As set out in sub-chapter 5.24, some form of demand management in areas beyond the central London Congestion Charging zone may be required in the longer-term if congestion remains a problem or if other objectives (for example' environmental aims) cannot otherwise be met. (NB a diagram, p252, mentions 'London-wide road user charging!').

The previous Mayor introduced the Western Extension Zone of the Congestion Charge against strong local opposition, and the 2008 consultation confirmed the strength of feeling for its abolition. It has no legitimacy, and the Mayor should abolish the zone at the earliest opportunity.

It is ironic that, when the current Mayor has been quoted as saying that he wants to make it difficult for his successor to introduce road user charging, his draft Transport Strategy seeks to provide an enabling mechanism for introducing it.

If there was absolutely no intention of extending Congestion Charging London-wide, why is it even mentioned? Previous surveys have shown opposition to road user charging in London is amongst the highest in Britain, and the West London experience helps to confirm this.

The revised Transport Strategy should make it clear that by default there will be no further road user charging in London. Any future Mayor should be required to seek popular support in a referendum, as was the case in both Manchester and Edinburgh – although Manchester's experience shows it would be preferable to avoid wasting tens of millions of pounds on trying to sell a scheme that has minimal popular support. This money would be better spent improving London's roads and public transport.

4. CARBON EMISSIONS / LOW CARBON VEHICLES

(p24) item E36 Reducing CO₂ emissions – The Mayor has a target of reducing London’s CO₂ emissions by 60 per cent by 2025, compared to 1990 levels. Given the growth in population and employment that is expected, meeting this target will be a huge challenge and far in excess of national targets. Road vehicles currently account for around 80 per cent of transport-related CO₂ emissions in London. Meeting the Mayor’s target will require strong commitment from TfL, the boroughs, Government, the EU and others to catalyse the introduction and use of low carbon road vehicles, including the provision of charging points for electric vehicles and a package of incentives to ensure price competitiveness of low carbon vehicles and, if required, to introduce further demand management measures.

(p34) para 41...Road user charging may be considered if required to meet the CO₂ emission reduction target (subject to technology enabling a fair scheme to be developed).

See above comments on emissions and ‘fairness’. There is much scepticism over national carbon reduction targets, and their potential for damaging the economy. The 60% target for London is viewed with the same scepticism, with the feeling that it can only be achieved by radical enforced lifestyle changes. Such changes can only saddle the economy with costs and depress growth.

If it was so crucial to reduce emissions, neither the current nor the previous Mayor would be laying on large-scale fireworks displays such as for the Thames Festival. This policy is hardly consistent with others, but has been maintained because it is popular.

In its 2009 report on road user charges (p29), TRANSCOM also notes that much of the improvement in air quality resulting from the designated London Low Emission Zone would occur anyway as a result of wider trends, such as more modern vehicles.

<http://www.publications.parliament.uk/pa/cm200809/cmselect/cmtran/103/10310.htm>

5. CYCLING / CYCLE SUPERHIGHWAYS

(p179) Proposal 53 calls for Cycle Superhighways – initially 2, eventually 12. Proposals 53/54 - Cyclists will also be encouraged to ride ‘the wrong way’ (i.e. against the flow) up one-way streets, subject to a change in the Highway Code.

(P178) Where possible, car access should be restricted in residential neighbourhoods to reduce speeds and create pleasant and safe spaces for cyclists.

ABD understands from the Streets Team in Transport for London that Cycle Superhighways will involve some new capacity for cyclists, some use of existing bus and cycle lanes, and some ‘reallocation of road space’ away from drivers. The latter will tend to aggravate rather than reduce congestion.

The proposal to let cyclists ride one-way streets also stands to reduce available road space and slow down vehicles; intuitively it will increase frustration for various road users and accidents.

It is an odd form of ‘demand management’ that proposes to take away scarce road space from the drivers who pay for it, while artificially trying to stimulate more demand for cycling.

These ideas seem to be a gratuitous attempt to reduce car use for the sake of it, using sanitised language to cover up mean intentions. Car users have paid taxes to use road space several times over and should be treated with more respect by ‘public servants’.

Priority for cyclists seems at odds with the current Mayor’s policy of treating road users equally, rather than operating the stilted ‘hierarchy’ of his predecessor – it should be remembered that typically only drivers (including motorcyclists) are taxed to use the road.

6. INTELLIGENT SPEED ADAPTATION (ISA) / SPEED LIMITS

(p193) Over the course of this strategy, it is hoped that such technology [ISA, ‘Intelligent Speed Adaptation’] will become more widespread through TFL encouraging companies to fit the technology. The fitting of ISA to company cars and vans, following suitable trials, and on the basis that it can be shown value for money.... [20mph zones] particularly in residential areas with positive road safety effects which are enhanced when accompanied by enforcement.

‘ISAs’ are potentially dangerous in some situations, as they remove control from drivers. There can be problems (e.g. with overtaking) when speed limits suddenly change and the ISA intervenes.

20mph zones are seen as another attempt to punish drivers for the lack of care and attention of other road users. Drivers are already legally obliged to adjust speed to the conditions and should take especial care outside schools in school hours (e.g.) but blanket limits are not the answer. There are better means of preventing accidents – like police patrols, barriers and particularly the education of all road users. We don’t want to see schoolchildren or other pedestrians hit at any speed!

7. KEEPING LONDON MOVING

The current Mayor was elected in the expectation that he would keep traffic moving better. Apart from the measures that ABD suggested to address congestion, there should be a review of speed limits on major routes, and the limits raised where possible (e.g. 40mph to 50mph on the A40 Western Avenue in Perivale). In some cases, this will mean restoring previous limits before ‘policy interventions’ that artificially reduced them, coinciding with the introduction of lucrative speed cameras.

Traffic in London is often held up by under-used bus lanes. Long queues in outer lanes are matched by under-used bus lanes, which are often empty. Many buses that use them are well under capacity.

The Mayor’s Transport Strategy should commit to a review of bus lanes, so that ‘car exclusion lanes’ are only allowed where objectively necessary to operate a frequent bus service that carries a greater number of travellers than the cars that could typically make use of the road space.

Otherwise, cars should be allowed in these lanes at any time where they will not inconvenience a bus; perhaps operating like a box junction.

The hours of operation should be clearly signed, and periods of restriction should only apply where objectively necessary. There should be no 24 hour lanes.

Proposal 83 (p205) – to consider trialling removal of traffic signals - would appear to be a step in the right direction. This would also save money on power consumption.

The Mayor's Transport Strategy should also direct transport authorities not to remove road space without compelling objective reasons. Unnecessary pavement widening in King Street, Hammersmith reduced the number of road lanes from three to two, aggravating the stress around Hammersmith Broadway and creating dangerous tailbacks.

8. ROAD MAINTENANCE

(p136) Proposal 35 commits to working with Boroughs and other stakeholders to put network assets in a good state of repair (90%?) and to promote road user satisfaction.

(p209) Proposal 85 – low noise road surfacing where possible

(p193) Proposal 70 calls for targeted physical engineering/design to improve road safety across London's road network

More detail on these proposals would have been welcome, especially on how 'road user satisfaction' would be objectively measured and reported.

In principle, ABD supports targeted physical engineering/design to improve road safety across London's road network, although this should be done in a manner that is driver-friendly. The politically-correct wording about priority for pedestrians and cyclists in Proposal 70 is disappointing, given the more enlightened attitude of treating all types of road user equally.

One positive contribution that the Mayor's Transport Strategy might make would be to ensure that transport authorities repair road surfaces promptly. The growing number of potholes and poor road surfaces can only be a threat to the safety of road users, whether on four wheels, two wheels or pedestrians. It is scandalous that compensation for vehicle damage is around the same level as the spend on road maintenance.

Given the large contribution from drivers to the Exchequer, some of these billions might be given back to transport authorities. This would also boost employment.

The Mayor's Transport Strategy should also require transport authorities to remove 'street furniture' such as road humps that damage vehicles' tyres and suspensions. The London Borough of Barnet has shown that this can be done with an increased contribution to road safety.

9. CONCLUSION

ABD opposes the proposals implicated in our comments in sections 1-6 above.

ABD would be pleased to meet with Transport for London officials in the interest of developing more balanced policies that will produce greater 'road user satisfaction' amongst drivers.

BRIAN GREGORY

Chairman, Association of British Drivers,

www.freedomfordrivers.org