



# The Association of British Drivers

London Region: PO Box 62, Chislehurst, Kent, BR7 5YB; Tel: 020-8295-0378;

Web: [www.freedomfordrivers.org](http://www.freedomfordrivers.org)

Air Quality Strategy Consultation  
Post Point 19B  
FREEPOST LON15799  
City Hall, The Queens Walk  
London  
SE1 2BR

Via email to [maqs@london.gov.uk](mailto:maqs@london.gov.uk)

17 May 2010

## Consultation on the Mayor's Air Quality Strategy

Dear Sirs,

The following is our full response to the above consultation. Although we generally welcome the Mayor's objective in improving the air quality of London, we think some of the details of the policies are misguided. Our comments are therefore:

**1. Congestion Charge.** In Section 1 (page 2) the document states, "*Measures already announced or underway that will reduce emissions in London include*" and then goes on to mention the Congestion charging scheme. Unfortunately this is simply untrue and hence the argument put in Section 3 that "*The continuation of the Central London Congestion Charging scheme reduces traffic congestion and associated emissions and helps promotes mode shift*" is simply unsustainable. In addition it is well documented that the scheme has had no impact on reducing congestion which is now as bad as it was before the scheme was introduced.

For specific evidence on the subject of the impact of the Congestion Charge on air pollution I would refer you to the article entitled "Congestion Charge and Air Pollution" on this page of one of our web sites: [www.freedomfordrivers.org/Congestion.htm](http://www.freedomfordrivers.org/Congestion.htm) . There is in reality no clear and obvious benefit in respect of air pollution from implementation of the Congestion Charge. These claims have been made repeatedly by TfL and simply do not stand up to scrutiny which is why we would like to see the Congestion Charge scrapped. It should certainly form no part of the Mayor's Air Quality Strategy. TfL's claims are typically based on "estimates" of emissions reduction when the actual figures indicate a completely different situation. Indeed it is quite likely that the congestion charge increases total emissions, as vehicles drive further to avoid entering the zone.

For those reasons we obviously support the removal of the Western Extension of the congestion charge zone as is proposed.

**2. London congestion.** The report alleges that particulate levels in London are much worse than in other UK cities because we have more traffic and traffic congestion. This is surely symptomatic however of past transport policies in London, with an encouragement to obstruct traffic and slow it down rather than expedite it. The resulting congestion generates high levels of pollution. The installation of excessive numbers of traffic lights is just one example. In addition there has been a failure to develop an efficient road network that copes with the demand for road transport in London over many years, unlike other UK cities who have put much more investment and sensible planning into such networks. Traffic “mismanagement” in London has been the norm, rather than traffic management.

**3. Electric vehicles and promoting cleaner vehicles.** As regards electric vehicles and their promotion, we recognise that they could make some contribution to reducing pollution within London, although in practice they tend to simply transfer the pollution emissions from the generating stations required to create the electricity to more rural areas – at least that will be the case until there is substantial low emission generation from nuclear power stations and other “renewable” sources.

However, before there is massive investment in the infrastructure to support such vehicles and large amounts of expenditure on promoting their purchase and use, we would like to see that they are practical to use over an extended period of time, and obtain general public acceptability. This is far from obvious at present, although we recognise that technological improvement is taking place in this area. The economics of such vehicles also need to be attractive to users and again there seems to be some doubt on this.

We fully support the Mayor in encouraging the development of technologies to improve emissions, and to reduce brake and tyre wear emissions, which are obviously now significant factors.

**4. Buses and taxis.** But we support the use of hybrid technology in buses, and the promotion of electric-powered taxis, private hire vehicles and local delivery vehicles which are some of the major contributors to high particulate levels because they are mostly diesel based and are often older vehicles. Similarly we support the restriction on the use of older taxis and private hire vehicles and compliance with Euro 4 standards that is proposed.

**5. Priority Locations.** Some of the priority locations mentioned in Section 3 (pages 58/59) are good examples of the problems created in recent years by past transport policies. For example consider the Victoria Embankment, Upper Thames St and Tower Hill corridor which is one of the few main east-west routes and which continues to be congested during much of the day, despite the fact that it runs through the congestion charge zone.

Other routes across London north of that corridor through the City and West End (south of the inner ring road) have been obstructed by the imposition of road closures and one-way systems.

Likewise the alternative route south of the river via Jamaica Road, St Thomas Street and Southwark Street has been obstructed by the introduction of a bus lane on Jamaica Road (taking up half the road space and totally unnecessary), by the repeated closure of St. Thomas St, and reduction of road width on Southwark Street.

The above measures have transferred more traffic to the aforementioned corridor. In the meantime, construction works to buildings on Lower Thames Street have obstructed the road, and caused the imposition of a temporary 20 mph zone (now increased to 30 but still enforced by speed cameras). In addition the road has been repeatedly dug up by utility companies, and otherwise subject to traffic engineering work. Lower Thames Street also suffers from poor traffic light phasing and traffic light controlled pedestrian crossings that are not linked into the other lights. The result is traffic congestion on a relatively short stretch of road, in a “valley” formed from adjacent buildings, so it is not surprising that pollution levels are high.

Certainly it would be worthwhile to look at measures such as power washing the road and applying dust suppressants, but there needs to be a more general recognition of how the road network can be improved to reduce these kind of bottlenecks.

Note though that we strongly oppose the proposal for weekend closures of the Victoria Embankment on what is a very important route for traffic.

**6. Speed Cameras.** We are also opposed to the introduction of speed over distance cameras on Victoria Embankment allegedly to reduce exhaust emissions and brake/tyre wear. Where is the evidence that such measures would have any significant effect? The speed of traffic on Victoria Embankment rarely exceeds the speed limit of 30 mph, and with numerous traffic lights on the route, it seems unlikely that such cameras would have any impact on emissions.

The proposal to reduce the speed limit on Park Lane to 30 mph, and impose it by the same type of cameras also seems unjustified given the nature of the road. We doubt that there would be any significant benefit to air pollution, particularly as a large proportion of the pollution is created by buses, taxis, and LGVs which are probably already driving at a lower speed than 40 mph.

Reducing traffic speeds forces vehicles into lower gears and in terms of emissions per distance travelled is likely to increase emissions, not reduce them. Such measures are therefore directly contrary to the stated objective.

**7. Action Days and special measures.** We are strongly opposed to “action days” involving road closures or other special measures that disrupt travel in unexpected ways. The resulting diversion of traffic simply loads emissions onto other areas and as these events are typically only PR stunts that have the support of very few people, they should not be promoted or money spent on them.

Likewise we oppose the closure of lanes or roads in response to particularly poor air quality on certain days. As regards the health risk from air pollution, this is surely more an issue of longer term impact rather than short term exposure on limited parts of the road network.

**8. Encouraging Smarter Choices and Sustainable Travel Behaviour.** We are skeptical of the benefit of “eco-driving” training. We have never seen any evidence that this has any significant long-term impact on the way people drive or on emissions from vehicles. It would be wrong to invest money in such schemes without such evidence.

Likewise we doubt there will be much benefit from the introduction of a “no-idling zone” with much higher penalties for infringing. Is this possibly simply a “gesture” with no real benefit, and with the excuse for councils to impose large fines on people for trivial infringements of regulations (an approach that is becoming ever more popular with local councils). Where is the evidence that such regulations might have a significant impact on emissions? We therefore oppose this proposal, or suggest that the penalty should remain at the present level.

However, we do recognise that there are significant benefits to be obtained from smoothing traffic flows. It is clear that over the last few years, the traffic on many routes has been impeded by additional traffic lights at junctions, traffic light controlled pedestrian crossings, the increase in pedestrian phases, the removal of pedestrian underpasses or bridges in favour of street level crossings, the lack of control of road works, and many other similar measures. In addition road space has been reduced in favour of pedestrians, and gyratory systems removed to the detriment of traffic flows.

The changes in Trafalgar Square and the more recent scheme at Aldgate have both been enormously damaging to traffic movement, with little benefit to pedestrians as a result. Both schemes have created long queues of standing traffic on the approach roads for much of the day, undoubtedly resulting in higher emissions levels to the discomfort of everyone.

**9. Improving Road Maintenance and Road Works.** We support the proposals to ensure that road maintenance is improved so as to reduce surface emissions. It is clear that some boroughs are much worse than others in this respect with boroughs such as Camden and Southwark spending enormous amounts on anti-motorist measures, but little on basic road maintenance.

Likewise, road works are a persistent cause of traffic congestion and the Mayor’s proposals to control these more effectively are welcomed.

**10. Speed humps.** It is well known that speed humps generate significantly worse air pollution – they can increase pollution by over 50% (see this web page for more details of the evidence: [www.bromleytransport.org.uk/Speed\\_Humps\\_USA.htm](http://www.bromleytransport.org.uk/Speed_Humps_USA.htm)). We suggest therefore that a policy should be adopted to remove such humps and replace them by alternative road safety measures (where necessary) as a contribution to reducing emissions.

**11. Diesel vehicles.** It is surprising that the report contains no specific proposals to discourage the use of diesel powered vehicles which contribute very substantially to particulate emissions in comparison say to petrol-engined vehicles. We suggest that this issue be examined to see whether proposals to discourage the use of such vehicles as taxis, private hire vehicles and as LGVs in London could not be developed.

In summary, although we support some of the specific measures proposed, and

advocate others, we think the solution to the overall emissions problem should be an emphasis on improving the road network so as to reduce congestion, and an encouragement of technological solutions.

Yours sincerely

Roger Lawson  
ABD London Co-Ordinator

### **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 site at [www.freedomfordrivers.org](http://www.freedomfordrivers.org)