

Mayor's Transport Strategy – More Analysis

By the Alliance of British Drivers (ABD London)

We previously published a short summary of our initial impressions of the Mayor's new Transport Strategy. Needless to say our comments were not positive. What follows is a more detailed analysis of what is said and the proposals therein. The most important points are highlighted in bold italics.

As the editor of Local Transport Today (LTT) said, "Khan plans to make cars an oddity on London's streets" which encapsulates one of the key themes. The Mayor's "Healthy Streets" strategy is aiming to get all Londoners walking or cycling, when they are not using public transport. Private vehicles are to be strongly discouraged, particularly carbon based cars, taxis, and LGVs. Health and "quality of life" are key topics, and that includes coping with the anticipated growth in the population of London over the next few years. The objective is to create a "city for all Londoners" (page 5), whatever that means. As you can see already, the document is full of meaningless sound-bites and political rhetoric. One has to delve into the detail and read between the lines to understand what is actually being proposed.

From here on, the comments are made under the same headings as in the Mayor's Transport Strategy Executive Summary and the full strategy document (MTS – see below for link to them).

London's Challenges (Exec Summary)

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 they been asked whether they support such growth or how they would like to see transport improved in London? Basically no.

The Vision

The Mayor says that car dependency affects the elderly and disabled and reduced car use with more public transport and "more space for people" will help them. That surely makes little sense. For those who find walking any distance difficult, public transport is difficult to use and cars (or PHVs/taxis) much easier. The elderly even dislike buses because they are so unstable for passengers. The Mayor gives the impression that laying his hands on this problem will immediately enable the disabled to drop their walking sticks or get out of their wheelchairs and be able to walk to the nearest bus stop. What utter nonsense. But the Mayor intends to push ahead to achieve 80% of journeys by foot, cycle or public transport by 2041 (currently 64%).

The Healthy Streets Approach

This section of the MTS simply says that making streets more attractive in environmental terms will increase walking and cycling. That is undoubtedly the case and nobody is likely to oppose such ideas. But the Mayor does not provide any figures for the cost of such projects. As this writer knows from experience of such proposals in his local London borough, even small schemes can cost hundreds of thousands of pounds. Replicated across the whole of London would potentially require hundreds of millions of pounds of funding which historically has not been available. Will it be in future? Perhaps one might view this more as an aspirational objective.

Healthy Streets and Healthy People

This expands on the Healthy Streets concept by spelling out that “walking will be prioritised across London’s streets” with wider pavements and crossings that are easier to access and use. It is not clear what the latter means, but widening the pavements can create more traffic congestion if carriageways are reduced in width or lanes removed as has been happening already in recent years (road space reduction is already blamed for increased congestion despite the “congestion charge” being introduced). Overcrowded pavements are a very minor problem (localised in time and space) so adopting such policies over a wide area will be very disruptive as well as expensive (even minor road configurations cost a lot of money).

This section of the MTS also says the “Mayor aims to reduce total traffic in the capital by 10-15 per cent by 2026”. But even if some car users are deterred, or encouraged to shift modes, the Mayor is ignoring the “unsatisfied demand” for more road trips which was one reason the Congestion Charge was unsuccessful in reducing congestion.

But he does say such reduction will be led by the London boroughs and the “Mayor will give consideration to the development of the next generation of road user charging systems”. ***This appears to suggest that he will allow London boroughs to introduce local congestion charging (and some of the Labour controlled boroughs such as Camden, Islington and Greenwich would undoubtedly welcome such a capability). So this proposal is not just about improving or rationalising the technology of the central London Congestion Charge but the ability to allow anti-car local boroughs to introduce a patchwork of charging across London and disrupt the free flow of vehicles.***

It also says that he “will seek additional powers from the Government to limit the number of private hire vehicles in London”. ***This would be a major blow to the PHV market and would be particularly disadvantageous to disabled people. For example, it might increase their costs to visit central London hospitals or make such journeys problematic.***

Below is one of the graphics used in the MTS to show this brave new world – no private cars, no taxis, no PHVs, no LGVs or HGVs, only pedestrians, cyclists and buses with an underground station immediately accessible. Are these and other images in the document realistic? Surely the answer is no even if the MTS is adopted.



A Good Public Transport Experience

The Mayor's laudable objective is to make public transport more attractive by making them easier and more pleasant to use. Nobody is likely to object to that. But he goes on to say "buses will be given proper priority"(Exec Summary Page 10), so presumably that means more bus lanes. He also says "fares will be kept affordable" so the existing massive subsidies to public transport will no doubt be continued.

Chapter One – Main Report – The Challenge

It says "London Streets should be for active travel and social interaction....", which is surely an attempt to "repurpose" our streets from what they have traditionally been used for. It suggests that most of the main causes of death are linked to inactivity, including heart disease and cancer. That is a very questionable statement. Some cancers are correlated with physical inactivity but most are not and whether that is a causal link is very doubtful. It could just be that those who are generally unhealthy or smoke and drink a lot of alcohol are vulnerable to a wide range of cancers but that does not mean that having them take more exercise would prevent more cancers. The Mayor is over-egging his case here as in a lot of the MTS document.

But the Mayor spells out the problems of public transport in London on page 13. To quote: "*Unreliable rail services make journey times unpredictable, wasting people's time and even threatening their livelihoods. Overcrowding on rail and Tube networks has a big impact on people's lives – often making large portions of people's daily routine unpleasant and stressful – and can deter some people from using public transport at all. Buses are London's most heavily used form of public transport and are also accessible, but journey times can be unpredictable and ridership levels are falling. Being stuck on a bus in traffic, not knowing how long it will take to get to work, school or the shops, is frustrating but it is becoming an increasingly common experience across London*". But the only solution the Mayor appears to offer is a promise of more bus lanes.

Planning London's Streets

The Mayor reiterates his objective of reducing "car dependency" on page 21, and states: "The Mayor's aim is, by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day". That may not be as difficult as one imagines because those who commute into London often walk for that time to get from/to bus stops or train/underground stations already.

The Mayor also introduces some targets for road safety on the same page. He aims to eliminate deaths and serious injuries from all road collisions by 2041, and no deaths involving buses by 2030. But he does not say how he is going to achieve that in detail. Reducing private car usage alone will not do so.

Good Growth

The Mayor says that "Growth is good for London", but that is very questionable. Everyone has seen the negative effects of excessive growth in population in recent years. Overloaded transport systems, excessive air pollution (and not just from vehicles), and problems in local authority budgets.

On page 27 he says that a capacity increase of about 80% is required in central London on the rail and tube networks to tackle overcrowding and support growth to 2041. How is that to be achieved? It is not explained. Again it is necessary to say that reducing private cars will not help – in fact it might actually make matters worse as car users move to public transport.

London's Regional, National and International Links

The Mayor supports HS2 and Crossrail 2. He agrees that a "good national strategic road network" is required but in the M25 area all he says is that strategic roads "must be managed to cater for essential journeys, without increasing car dependency" (page 33). ***That is very ominous and suggests no expansion of capacity and demand being managed to reduce usage – and that means rationing on price (road pricing) or other measures.***

The Mayor is also opposed to a third runway at Heathrow because of noise, air quality problems and the strain on the local road and public transport networks. Residents in the many parts of London may well agree with him on this, but the national Government clearly does not at this time.

Healthy Streets and Healthy People

Chapter 3 reiterates the health theme. It suggests on page 41 that one quarter of current car trips could potentially be walked, and two thirds could potentially be cycled. He aims to plan streets to achieve that mode shift. Is he being realistic? Surely not. With an ageing population, the probability of a lot more people taking up cycling is surely low. But on page 45 it suggests that even more than three quarters of car journeys could be replaced by “more active, healthier forms of travel”. Surely this is way too over-optimistic.

Pages 49 to 51 contain some specific proposals;

1. The creation of more “liveable neighbourhoods” – see comments above.
2. Reducing dominance of vehicular traffic in central London, including transforming Oxford Street and looking urgently at changes to Parliament Square.
3. A London-wide cycle network.
4. Develop the “Walk London” network.
5. Develop pedestrian maps and improve on-line journey planning.
6. Expand usage of the Cycle Hire scheme.

Focus on Buses

It says on page 61 that London’s buses are rapidly becoming cleaner and quieter. That is surely required because they are one of the major sources of pollution at the worst “hot-spots”.

Vision Zero to Tackle Road Danger

The Mayor gives more details on the proposed accident reduction targets on page 63. He aims to achieve that by lowering traffic speeds, safer street design, ensuring safer vehicles, and improving the behaviour of all road users. He also aims to improve compliance with speed limits. **So it looks like we will be getting more 20 mph speed limits, and more active enforcement of them. With reduced traffic speed, and the associated increase in journey times, many road users will not be happy with this.** Will it actually achieve the objective? Probably not because there is no evidence that wide area 20 speed limits have any significant impact on traffic accidents.

Focus on Opportunity to Reduce Car Use

Pages 77 to 83 discusses the capability to reduce car trips further and the existing Congestion Charge system. It says on page 79: “When the Congestion Charge was introduced in 2003, it was very effective in reducing traffic levels and congestion”. **This is simply untrue. The ABD has published analyses of the effectiveness of the Congestion Charge and in essence congestion was not reduced at all, even though the charge was subsequently doubled.** For more information, see: <http://www.freedomfordrivers.org/Congestion.htm> . In summary, the Congestion Charge was a very expensive failure and has simply turned into a tax on travel. Technically it was also simplistic in operation and did not even recognise the time or distance travelled within the zone. In addition, various categories of vehicles were exempt – taxis, private hire vehicles (PHVs), etc.

The extended hours of business and leisure activities, and more travel on weekends, have undermined its impact, plus the increased number of PHVs (created by the use of apps such as Uber) have also made congestion a lot worse.

The Mayor indicates (Proposal 18) that he will keep the existing Congestion Charge under review. **It seems quite likely that he will revoke the exemption of PHVs or otherwise restrict their numbers.** Also under Proposal 19 he may develop “next generation road user charging systems” and workplace parking levies.

In practice, this no doubt means replacing the simple (if simplistic) existing London Congestion Charge and ULEZ systems with a more extensive and pervasive road charging system based on measuring time, distance and pollution across the whole of London. This will not only be enormously expensive (even more than the existing system) but require either an enormous number of cameras to recognise number plates, or the installation of devices in vehicles. Proposals 20 and 21 will enable, and provide support to, those boroughs who wish to pursue demand management

Focus on Borough Traffic Reduction Strategies, and Emissions Control

The above themes are expanded on page 84, where it says the Mayor will look at “new ways to discourage non-essential car and freight trips”. But who is to judge whether a trip is essential or not? He also spells out that he will reallocate road space to encourage more walking, cycling and public transport usage. That includes “vehicle-free zones” and “filtered permeability” so certain traffic is prohibited from using some streets.

Policy 22 on page 89 reiterates his proposals to extend and bring forward the ULEZ proposals already announced so that the whole of inner London (and all vehicles except taxis) are covered by 2021.

Policy proposal 6 on page 93 extends this further by advocating a zero carbon London by 2050. But the extended time line will give time for vehicle owners to replace their vehicles and as electric vehicle technology improves that may not be a problem except for particular classes of vehicles such as HGVs. It is the shorter-term objective of meeting the 2021 regulations which will create the most difficulty and cost for vehicle owners.

In addition, he suggests that zero emission zones in town centres and in central London should be delivered by 2025 (Proposal 33). ***This means that unless you have an electric vehicle, it may be prohibitively expensive to drive around much of London in just a few years' time (much sooner than the vehicle population will change).***

Focus on Reducing Emissions from Non-Road Transport Sources

In comparison with the attacks on road transport, the other sources of emissions get off lightly. You should bear in mind that 50% of NOX emissions come from other than road transport sources – mainly business and domestic heating/cooking and other processes. ***The expansion of the population and business activity in London that is planned for will increase emissions substantially. But the Mayor does not suggest the obvious remedy – namely to reduce growth.***

Public Transport

In Chapter 4 (pages 115 onwards) the Mayor covers how public transport can be improved. Much of this section consists of aspirational statements rather than specific proposals, but he repeats his desire to take over all surface rail in London which many residents would oppose (page 157 of the MTS gives the details).

Buses are covered in several proposals including Proposal 53 which says “The Mayor, through TfL, will adjust bus service volumes to support measures to reduce car use...”. ***Does that mean he will add bus services even though they may be lightly used? That will increase the massive subsidies received by bus services even greater than they are now.*** But it does suggest that bus services could be redistributed from central London to outer London where the potential for mode shift is higher.

The next section (page 137) suggests that bus priority measures should be extended, with more 24-hour bus lanes, and “bus only corridors” (one assumes that means more bus lanes). Bus ridership in London has been falling (and hence revenue from bus fares to TfL). This has been blamed on slower and unreliable journey times as traffic congestion has increased. But the reality is that bus lanes are already in place on most routes where they are needed or can be introduced. Indeed, the increase in buses in recent years has contributed to congestion and more slow-moving traffic (Oxford Street is a good example of this symptom).

Improving Rail Services

Page 143 spells out how overcrowded London's underground and surface rail lines actually are. He says: "Crowding currently exceeds four people standing per square metre on six out of ten Tube lines coming into central London. Crowding is also severe on some national rail lines, such as those coming into Waterloo. At 60 per cent of stations within Zone 1, Tube trains depart with crowding in excess of four people standing per square metre. This is particularly challenging at Tube stations serving national rail termini, with more than 75 per cent of stations affected. This can make it difficult to board trains in some cases, and delays journeys."

As the Mayor points out, employment growth will exacerbate this. But his only solution that might have any significant impact on the short term is to provide more data to users so they can avoid the peak times or routes. **He still wishes to push ahead with the growth of business and population in London despite these problems. This surely makes no sense. A strategy to reduce demand would make more sense. If the Mayor thinks that demand management will work for traffic congestion, why not rail and underground congestion?**

The Mayor does support the expansion of lines, including Crossrail 2, but such projects take many years to deliver, and are very expensive (a figure of £32.1 billion is mentioned for Crossrail 2 alone). Extensions to the DLR and Croydon Tramlink, and upgrades to capacity, are also proposed.

New Homes and Jobs

Chapter 5 promotes the "growth" agenda for London further. To ensure this is "good" growth and supports the Mayor's policies, he promotes the planning of high density, mixed use developments in locations with high public transport support. **In addition, he proposes that provision for car parking should be limited (Proposal 76). Indeed, he proposes "car-free" development in accessible areas which implies no parking provision at all.** The consequence of such policies, as we have seen in the past, is excessive on-street parking and more congestion.

But to cover those areas with low PTALs (Public Transport Access Levels) he proposes "demand-responsive bus services (page 213 – Proposal 87).

Silvertown Tunnel and East London River Crossings

The Mayor supports the construction of the Silvertown Tunnel in East London, alongside the Blackwall Tunnel, but will impose charges on both of them (Proposal 88). However, crossings further east (bridges, tunnels or ferries) as were proposed under the previous Mayor look like they will be delayed and so hedged around with conditions that they will be unlikely to be progressed (see Proposal 90). But there is mention of a possible North Greenwich ferry and a pedestrian/cycle crossing from Rotherhithe to Canary Wharf (page 229).

Decking Over Roads and Tunnels

The previous Mayor promoted the concept of easing traffic congestion by building across underpasses, or putting roads in tunnels. In both cases the surface land thus provided, which could be then developed, could help to pay for the cost. But the only proposal this Mayor is taking forward is to look at the feasibility of doing it over the A13 at Barking (Proposal 93).

Delivering the Vision

Chapter 6 gives some more details on how the policies are to be delivered. There are further attacks on private cars, and the simple suggestion that removing access to "kerb space" (presumably meaning on-street or permit parking) is one simple way to reduce car usage.

Proposal 99 covers demand-responsive bus services which it is suggested might be autonomous vehicles.

But on page 265, the Mayor explains his financial difficulties in achieving his vision. He says he needs “new income streams” and needs to diversify funding sources – and the latter requires “the devolution of additional powers to the Mayor”. **A clear attempt to grab more powers to enable more taxation.**

He goes on to say “A new approach to funding and delivering the transport network is therefore required. This must include addressing the fundamentally inadequate and unfair way in which road use is paid for in London, with motorists paying too little, and in effect being subsidised by public transport fare payers”. **This is simply inaccurate and grossly misleading. Public transport fare payers do not subsidise anyone. They are subsidised themselves from local and national taxation. Motorists pay much more in taxes than is spent on the provision of roads. On a national basis, and in London, they subsidise public transport users, not the other way around.**

The Cost of the Strategy

Pages 267/268 spells out that the strategy proposed will require capital investment of £3.3 billion per year, most of which probably has to come from TfL’s resources. But clearly this will be insufficient because the Mayor is asking for:

- Revenue raising powers. (Note: the Congestion Charge and ULEZ proposals are not technically revenue raising regulations even though they have turned into a tax on motorists. In practice they have been distorted to perform that function). The Mayor is asking for more powers to raise tax than they alone provide.
- A development rights auction model on major infrastructure projects. This expands the ability to obtain funding from developers (at present only covered by Section 106 agreements).
- In addition, he is asking that revenue from Vehicle Excise Duty (VED) be “devolved to TfL”. That would include “powers to change how VED is levied” which means the Mayor could set the charge rate for London residents presumably, or charge it in a different way to an annual fee, i.e. based on a new road pricing model.

Needless to point out that these proposals would give the Mayor the ability to build a financial empire and dictate the lives of Londoners much more extensively than at present. Such wide ranging and sweeping financial powers for someone who, once elected, has dictatorial powers is surely inappropriate.

The reason he is asking for these additional funding capabilities is undoubtedly because TfL budgets are already under severe pressure. The Mayor’s promise of a freeze on public transport fares will still create a deficit of £640 million by 2020. Although the Mayor has been making “efficiency” savings on what he alleged was a flabby TfL organisation, staff pay is still growing (an astonishing 458 TfL staff members earned more than £100,000 this year, and the number would be 490 if one added in GLA staff). A number of contract staff have been cut, but with bus revenue falling and grandiose projects still in the pipeline one can see exactly why the Mayor needs more funds.

The ULEZ proposals for just the central Congestion Charge zone (where the cameras are already present) was forecast to cost TfL (after revenue from the linked charges) £343 million up to 2023/4 (Source: Mayoral Decision Document MD1463). Bringing the extension of the ULEZ proposals forward, and covering the whole of central London will obviously cost a lot more.

However one looks at this, the financial plans to underpin the MTS look likely to be very dubious indeed. That hole can only be fixed by more taxation on Londoners as it seems unlikely central Government would wish to help.

That’s also ignoring the cost imposed on Londoners by the ULEZ changes which will mean paying fees to drive within central London (and that means anywhere within the North/South Circular) for many vehicle owners or upgrading to a new vehicle at very substantial cost.

It’s worth quoting from the document “A Breath of Fresh Air” published by Conservative Councillor Stephen Greek:

“expanding the ULEZ to the North and South Circulars would be very much a blunt instrument, imposing restrictions on large areas where the problem does not exist, yet, as described above, would deliver only marginal improvements in air quality across the expanded area. A far more effective and fairer solution would be to target hotspot areas with specific measures, alongside other measures that do not require a ULEZ, as set out later in this report.”

The economics of the proposals to control air pollution are dubious. Will TfL publish their costings? No they have refused to supply the data in response to an FOI request. In addition none of the ULEZ consultation documents or the MTS contain any cost/benefit analyses to provide adequate justification for the proposals.

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

Conclusion

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).

This is of course a common approach by Mayors, and their advisory staff in TfL, who live and work in central London. They simply do not understand the problems faced by residents of the outer London boroughs.

The Mayor also seems keen to bully us into living a healthier life style. But that should be a matter of personal choice and it is not at all obvious how moving people onto overcrowded public transport will significantly assist. To get Londoners to be more active should be more about education than dictatorship. The freedom of individuals to choose their transport mode should not be constrained.

Make sure you respond to the public consultation on the MTS by clicking on the link below.

Roger Lawson
22/6/2017
Alliance of British Drivers (London Region)
www.freedomfordrivers.org

The draft Transport Strategy is now open to public consultation – see:
<https://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017> . **Make sure you respond!**