

London Plan – Comments Submitted by the Alliance of British Drivers (ABD)

Chapter 1

Para 1.0.6 refers to "increased car dependency". This is an objectional and emotive phrase to describe the rational choice people make about their personal transport mode. It is no more relevant than to talk about "cycle dependency". It also refers to the "failure to consider the wider implications of London's growth" as resulting in "significant congestion" and "poor air quality" which is not true. Those problems have been created by a failure to control population growth, or alternatively provide the transport infrastructure to support such growth.

Para 1.0.8 also refers to car dependency in a pejorative way and should be reworded.

Para 1.1.2 shows how the population of London has grown rapidly by immigration. But the statement that London "must remain open and inclusive" suggests the Mayor wants more when past immigration has put a severe strain on the transport infrastructure, environment and other aspects of London. London needs to be "less open".

Para 1.1.3 suggests that "traffic dominates too many streets" that create barriers to "interactions". There is no evidence provided on this and we suggest it is simply not true.

Para 1.2.4 We do not agree with the Mayor's target for 80 percent of all journeys to be made by walking, cycling and public transport and it is not clear how that relates to "integrating land use and transport" in that paragraph, or how one justifies the other.

Para 1.3.4 refers to a "car dominated city" when there is no evidence provided of that. The objective stated there to make "streets become more social spaces" contradicts the basic function of streets which is to provide a transport network for people and goods.

Policy GG3 - C refers to the "Healthy Streets Approach" without defining what that is (perhaps it's in the Mayor's Transport Strategy but if so it needs to be spelled out here also to avoid any misunderstandings about what this Policy implies.

Policy T1

Para 10.1.1 refers to "Londoner's dependency on cars" - an emotive phrase which is inappropriate when referring to people's personal and often rational choices about the mode of transport.

There is no cost/benefit justification provided for forcing mode shift. It alleges that "Without this shift away from car user, London cannot continue to grow sustainably" for which no evidence is provided and we would argue is not true.

Para 10.1.2 argues that a shift from car use is the only solution to traffic congestion which is not true. Development of a good strategic road network (which London does not have) could solve that problem plus many environmental issues - but there is nothing in this document that proposes this. It is a major omission. In essence only more of the same policies that have failed in the past are proposed. Namely more restrictions on vehicles and more parking restrictions. That is despite the fact there are no current viable alternatives for local transport deliveries where LGVs are the current dominant mode, nor for certain journeys performed by car users.

Policy T2

The "Healthy Streets" approach is very poorly defined. There are lots of fine phrases in this section but little practical definition of what it means. Certainly policies to improve the street scene, to encourage walking and cycling, so long as it does not reduce road space for others, we would favour. Likewise improving road safety, reducing noise and pollution, we would also support but only so long as they are cost effective, i.e. the benefits outweigh the costs.

We would like the whole of Policy T2 to be rewritten so it more clearly explains what is proposed. At present such phrases as "reduce the dominance of vehicles on London's streets whether stationary or moving" could be interpreted by those who oppose the use of vehicles to advocate bans or aggressive measures against cars, PHVs, LGVs, etc. This is not acceptable.

Policy T3

We object to the proposals listed in Table 10.1 that cover:

- Borough-led traffic reduction strategies (including workplace parking levies) in the period 2017-2030. Such strategies impose enormous costs on those affected or major inconvenience when there are better approaches available to reduce traffic congestion.

- Road pricing and next generation charging (subject to further assessment).

The above two items should be removed from the London Plan unless there is much more cost/benefit information provided. We do not believe such proposals can be justified on economic or other grounds.

Policy T6 Car Parking

Para A - Car parking provision should not be related to public transport levels. It should be provided on the basis of what users want (i.e. the likely demand). There is no rational reason and no cost/benefit justification provided for such a policy.

Para B. Car free development should not be a presumption.

Para C. Maximum car parking standards should not be applied.

Para H. There should be no "borough-wide" or "area-based" car free policies allowed. All boroughs should be permitted to adopt minimum standards for parking provision.

There is no justification for any of these policies which would make many parts of London inaccessible to disabled people, those from other parts of the country, etc. The majority of Londoners do not wish to live in a "car-free" world and revert to a Victorian life style.

Para 10.6.1 It states "As the population grows, a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use". No evidence is provided to support this statement and we believe it is not true.

Policy T6.1 Residential Parking

Para E - There are many "retirement" developments for residents that are over 60 that do require parking provision. Many occupants of such developments own cars and use them, often into their 90s.

Table 10.3 Maximum residential parking standards. These are hopelessly inadequate to cope with the demand for parking by residents, thus leading to on-street parking which creates obstructions, road safety problems, and "severance" which other parts of the Transport Policies are opposed to. In effect these proposals are inconsistent with other policies and irrational.

Policy T6.2 Office Parking

Table 10.4 These provisions are inadequate. We object for the same reasons we object to the proposed residential parking standards above. Car free provision for central London offices simply will not meet the needs of some businesses - for example because of the lack of 24/7 public transport in London.

Policy T6.3 Retail Parking

Table 10.5 We see no justification in restricting the provision of parking in retail developments. No developer is going to provide for more than the likely demand.

Policy T6.4 Hotel and Leisure uses parking

We see no justification in restricting the provision of parking in such developments. No developer is going to provide for more than the likely demand.

Policy T8 Aviation

Para D. We support the Mayor's opposition to the expansion of Heathrow Airport. It is already a major source of air pollution and noise and we believe any development of that facility can only worsen those matters. There are better options which would have less impact on traffic congestion.

The Funding Gap

We note the "funding gap" of over £3billion per annum. We suggest that the Mayor's London Plan should be amended so that he stays within his resources. Plans and their associated budgets should be based on reality, not aspirations.

Para 11.1.13 We are opposed to devolution of fiscal powers to the Major. The Mayor needs to stop empire building and live within his financial resources. We do not want the Mayor to be raising taxes, or diverting what are national taxes to local needs.

11.1.23 and 11.1.26 We suggest the Mayor should also use compulsory purchase powers to develop a proper strategic road network in London. This document suggests that the Mayor has limited sources of funding, but in reality public transport users are massively subsidised. If such subsidies were removed so that users of such transport paid the real cost of travel, then the Mayor would have no difficulty with his budget, and the "funding gap" would disappear.

11.1.33 We oppose any suggestion that Vehicle Excise Duty should be devolved to TfL. That would create lots of anomalies between those who live in and out of London, while the latter use roads in London and vice-versa. The argument that it would enable investment in the road network is specious - there are no proposals in the London Plan whatsoever to invest in the road network and there have not been for the past 20 years. Any such funds obtained would simply be diverted to other purposes.

Roger Lawson 8/1/2018

Alliance of British Drivers London Region www.freedomfordrivers.org

The London Plan Public Consultation is here: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/how-comment-draft-london-plan>