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Editorial

The main topic in this report are the proposals from Transport for London (TfL) and the Mayor to tackle air pollution problems in London and how the road network might be developed. The former is more allegedly driven by EU legislation on the issue than the recent bout of smog that hit London, but it's really about money.

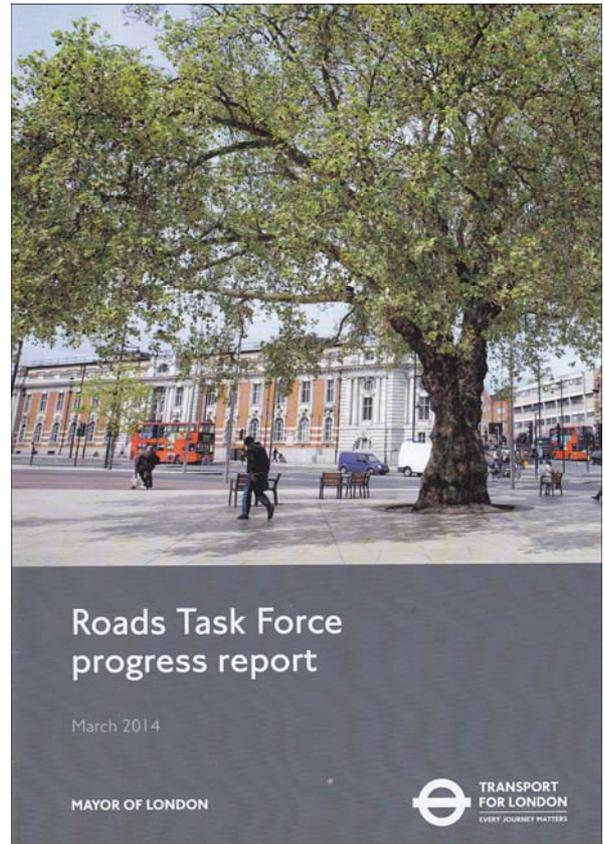
The Mayor seems to be keen to impose more taxes on us as part of the solution, but if you read what follows you can see that it is more about raising revenue than any scientific or logical approach to the problem. There is no cost/benefit analysis yet provided and I doubt that there will be. But it seems certain the Mayor is keen for the Congestion Charge to rise to over £20 a.s.a.p., if not even higher. No that's not a misprint - that's over twenty pounds to drive a few yards into central London.

Of course once you have persuaded the gullible electorate to accept the principle of a tax targeting private vehicles as Livingstone did, then you are on a path to social engineering on a grand scale. The current Mayor is simply continuing this approach in his promotion of cycling and on tackling air pollution.

I was going to write an article comparing the policies of the main parties as we are coming up to the London Borough elections on May 22nd. But I had great difficulty researching on the internet what their policies for London on transport issues actually are. If anyone knows what they are, perhaps they could let me know.

Roger Lawson, Editor

Roads Task Force Progress Report and Ultra Low Emission Zone (ULEZ) Seminar Report



On the 3rd March 2014, Transport for London (TfL) held a seminar covering the topics in the headline of this article. It was mainly attended by TfL staff, transport staff from local London boroughs with a few other "stakeholders" like the editor of this publication. As it was "invitation only", there were no members of the public.

A glossy leaflet entitled "Roads Task Force Progress Report" was handed out at the start (cover above). It is available on the internet if you care to read it. There were also hand-outs on the ULEZ that gave a lot of detailed information and are also available on the web if you search hard enough. This report is mainly based on notes taken at the meeting.

Isabel Dedring, Deputy Mayor for Transport, commenced. She mentioned a new "Incubator Fund" to encourage and support innovative ideas for transforming London's streets and places. Michelle Dix, Managing Director, followed. She forecast a 60% increase in congestion in central London over the next 16 years, and said "bolder interventions are required". *Comment: this is of course nonsense because London has had more demand for transport than the available capacity for the last 2000 years but as congestion is self regulating, average traffic speed has remained constant.*

She said they are looking at three areas: 1) intelligent traffic management; 2) changing travel behaviour (including reducing HGVs in peak periods) and 3) further public realm enhancements. These of course are all fine words, but this was like most of the morning - a one way presentation with no questions or comments from the audience permitted. Indeed the whole event looked more like a public relations exercise than any real "engagement" or policy development forum, as you will see later. In other words the typical TfL approach of "we'll decide what's best for you in conjunction with a few favoured advisers and then sell it to you".

Ms Dedring also said they were looking at the Inner Ring Road, and the North/South Circulars plus the management of traffic demand (avoiding mentioning all the time road pricing of course which is still a political hot potato to some extent). They are also looking at "flyunders" (as being considered in Hammersmith) and possibly new tolled tunnels. It later transpired that the tolling of such tunnels (as per the Silvertown tunnel proposal) might simply be used to restrain the otherwise growth in traffic that such tunnels would encourage. They are also looking at encouraging walking, cycling and car clubs.

Ian Wainwright then discussed Freight. He said they need to tackle congestion and air quality by shifting deliveries outside the 6am to 6pm hours when most activity takes place (and in particular the morning peak). But they need to collect more data on usage to figure out the answers. They also need to do a bit on safety (HGVs/cycle accidents for example). Improvements by voluntary means, incentives and regulation are the three targets.

Iain Simmons and Lilli Matson then talked about road maps. They have created a draft map of the TLRN network where roads are characterised into "street types" - for example, Arterial Road, High Road, City Hub/Boulevard, Connector, High street, City Street, Local street, Town Square/Street and City Place. They would like to apply this methodology to local boroughs.

Alan Bristow (Director of Road Space Management) then discussed the following: Development of road infrastructure assets, improving traffic signals, implementation of traffic management systems, improved provision of cycling, walking, improving streets and public places, capacity enhancements at key locations such as the inner ring road. He said there was £4bn to be spent on the road network by 2020 (*Comment: but it looks like almost all of it in central rather than outer London, with almost all the 33 "Better Junctions" site locations recently advertised being in the inner London boroughs.*)

For example at the Elephant and Castle total expenditure will be £3bn alone with developers and partners expenditure included. A lot of that expenditure will of course be on improving safety for cyclists.

Lucinda Turner talked about some pilot schemes, and Nick Lester and Alex Williams about "governance". TfL do seem to have recognised that they need to improve on communications with "stakeholders" and there will be a new TfL web site which lists major projects and consultations. It might even include contact names and contact details (but this writer wouldn't bet on that arriving).

Simon Nielson talked about strategic measures, such as mini orbital tunnels on the ring road and reducing freight in peak times.

We then broke up into separate discussion groups. Mine unfortunately included Jenny Bates of Friends of the Earth who proceeded to push her policies opposing new road capacity and her love of road pricing at every opportunity which I countered several times. The first session talked about street type designation, but I could see lots of problems here.

One example is Bank in the City of London. Is this a hub or a place? Some people would like it to move to the latter and remove all vehicular traffic including buses, when of course it is a natural hub from which roads radiate. It was clear that changing the "classification" of a road might lead to it being re-engineered or the usage changed, and there was no obvious democratic input into this process. A borough engineer or TfL might reclassify a road without any public consultation it seems to me and I made that point strongly. Also it has potential planning aspects - for example it might become part of local plans, but how was not clear - my questions were not answered on these points. Either these issues have not been thought through or TfL are avoiding debate on them.

Ultra Low Emission Zone

The afternoon session and discussion groups were devoted to the proposed Ultra Low Emission Zone (ULEZ) which is proposed to come in by 2020. Detail plans for it are still being developed. Mathew Pencharz, Mayoral Advisor, gave the presentation and said they are aiming for a 15% reduction in PMs and 20% reduction in NOX. From 2018 all new licensed taxis must be zero emissions (this has already been announced). But the hand-outs on how these targets might be achieved, or whether aggressive tactics were necessary to do so, were not at all clear.

The steps being taken or proposed are required to meet EU pollution standards even though 21 of 28 countries in the EU breach them, and many cities and towns in the UK as well as London do so. *Comment: don't hear much about other cities implementing such costly schemes though!*

One problem is increased dieselisation of the transport fleet (particularly cars of course) and this has meant that even with the proposed measures and improved vehicles, the EU standards won't be met until 2025. It was suggested that Governments need to correct the diesel problem by tax incentives.

Note that it became obvious that the ULEZ proposals are now firmly fixed on it just being applied to the existing Congestion Charge zone (CCZ).

My question about the point in this when clearly a lot of the pollution within that zone blows in or diffuses from outside was not answered. Indeed we saw this subsequently when a mild version of Smog enveloped London because of pollution blown in from the Continent, Sahara sand also blown in and low wind speeds meant it combined with local pollution before it was ultimately blown away as weather conditions changed.

It was reported that 5 million smaller vehicles enter the CCZ each year, but only 16% more than once per month. Implication: any regulations need to take into account enormous numbers of vehicles who rarely travel within the zone so enforcing vehicle change is not acceptable. The solution proposed is to make a charge for visitors entering so that frequent users who do not have a "compliant vehicle" (namely Euro 4 standard for petrol vehicles and Euro 6 for diesels), will pay a lot more and be encouraged to change their vehicles. Others can simply pay the charge or travel by another mode (or not at all of course).

The reason for the use of the CCZ as the defined area was because they already have the cameras and other infrastructure to enforce the ULEZ.

Charges might be either high (e.g. £130 per day as it is for the LEZ on commercial vehicles), or low (i.e. about £10 on top of the congestion charge, effectively doubling it). But there is a proposal to enforce a near zero emission limit from 2025 (and it could be earlier). They are modelling those charge levels and associated options, such as whether to include/exclude TfL fleet vehicles, all buses, HGVs, private cars and motorcycles - yes even the last on the grounds of being "inclusive". Note it took some effort to even get any admission of possible charge levels out of TfL, and as the debate on the models hinged on knowing that it was clear they wanted to develop policy on this without much public input.

Neither was there any apparent cost/benefit analysis being undertaken on the models, but it was very clear that the proposed charges would generate surplus revenue for TfL.

One motive might be to improve public health but it is clear that the other is to raise revenue, particular from private motorists whose contribution to the problem, particularly if they drive petrol cars, is relatively minor. It's the buses, HGV, LGVs and taxis that are the major sources of PMs and NOX as is well known. Perhaps some discouragement of all diesel vehicles might be considered but that was only mentioned in passing (Brussels has that apparently).

There was also discussion on whether there should be a "residents discount" as there is for the Congestion Charge (a.k.a. "tax" remember). I opposed such a discount in that I cannot understand why they should be exempt and it's potentially just a sop to get them to support this scheme.

In summary, a poor forum for real engagement with TfL with them avoiding the difficult questions (and not just from me), and not providing the evidence on which to judge their current thinking. I suggest readers oppose the ULEZ until some more logic and data is apparent.

For example, more clarity on the likely benefits of only imposing restrictions in the central zone, when a lot of the pollution blows in from outside. And a proper cost/benefit justification for any specific proposals that are developed (and exclusion of the benefit of more tax raising from the calculation).

Postscript and Editors Comments: It certainly seems that air pollution is being used as a stick to beat car drivers when even if you banned all cars from London, the impact might not be noticeable. But one problem in recent years has been the shift to diesel which has been caused by various government/EU actions:

- * Taxation of fuels and vehicles altering car demand patterns - for example it's simply impossible to buy petrol versions of many cars now. Or as one commentator said in the London Evening Standard: "So we've clogged our lungs trying to stop the ice caps melting", which many people believe is a futile attempt to stop natural climate change.*
- * GLA policies increasing the supply and usage of buses and taxis.*
- * Promotion of e-commerce and the rise of the delivery van.*

Many of these pollution problems will be solved by higher vehicle standards - Euro 4 and 6 for cars - but these of course do take time to come in and the vehicle fleet only changes slowly. But the response from TfL and London politicians to relatively minor air pollution problems are to use them as an excuse to take more money from road users.

Congestion Charge Tax to Rise



As most of our readers will be aware, because we circulated a note on it, the London Congestion Charge (a.k.a. Tax as it should be called), is to rise unless Boris

Johnson has a change of mind after reading the public consultation responses.

This is what your editor had to say in his response: "The proposed increase in charges is outrageous. Since the Congestion Charge Tax was introduced in February 2003, the Retail Price Index has increased by 41%. The original Congestion Charge fee was £5 per day, and it is now proposed to be £11.50 - which is an increase of 130%. The charge should be reduced not increased. In addition, it has been made more and more difficult to pay the charge with limited hours on the phone service (and long response times), no retail outlets supported and other steps taken to raise more and more money from users. It is clear that this scheme is all about raising revenue and not about reducing congestion. Indeed congestion has not come down, and TfL don't even bother to publish figures for it any more - presumably too embarrassed to do so, or wish to hide the true facts. This tax should be scrapped, not increased."

Other changes are that the AutoPay daily charge will rise to £10.50, the next day payment charge to £14 and residents charges will also rise.

The new charges will come into effect in June, but don't expect the publication of any final decision on this matter before the local borough elections in London are out of the way on May the 22nd.

Traffic Spies



"Traffic Spies" was the title of a report recently published by Big Brother Watch on the use of surveillance cameras to enforce parking and moving traffic offences.

The report highlights the dubious legal nature of many of these operations and the fact that councils raised £312m in revenue such means.

Despite guidance being issued by the Information Commissioner and the relevant Secretary of State, plus the enactment of the "Protection of Freedoms Act 2012", councils continue to ignore the law on these matters.

Fixed or mobile cameras should only be used to identify parking offences where there are no other reasonable methods of enforcement.

The report also alleges that the use of mobile cameras (CCTV Cars) might be a breach of the Regulation and Investigatory Powers Act 2000 (RIPA). They suggest that such surveillance is "covert" unless there are clear signs indicating it is being used and because it is "continuous" and unauthorised it is likely to be a breach.

(Editor's comments: despite the positive comments re parking in the London Borough of Bromley in the previous edition of this newsletter, they are actually typical of London boroughs in that they used both fixed cameras to monitor certain parking locations and mobile CCTV Cars. Both are unnecessary and why the council ignores the law and these points is of course simply down to financial incentives to do so in my view. It is a pity more people don't challenge their use when they get a parking ticket).

Privacy lost by Congestion Charge Cameras

When the London Congestion Charge (a.k.a. tax) was first introduced your editor was assured that the cameras could not be used for routine surveillance.

It was stated that there were no privacy issues because the police would only have access to them in exceptional and specially authorised circumstances. That has just changed with little publicity on the issue. The Metropolitan Police are to be given routine access to the 1,300 Congestion Charge cameras. Boris Johnson said doing so would help fight crime.

Redbridge automates the process

The London Borough of Redbridge is to use automated CCTV to fine drivers who make banned turns or infringe yellow box junction regulations. Previously the pictures required review by a human person but a new system from Videalert will automate the whole process using ANPR recognition software.

Government action

The Government has commenced a public consultation on the banning of cameras for parking enforcement. But London local authorities and the British Parking Association (BPA) have already strongly objected - their financial motives for this are clear of course. A BPA spokesperson was quoted as saying "CCTV is not specified in primary legislation and therefore you cannot ban what isn't there". He said unless there was primary legislation such a ban would be open to attack via a judicial review.

News Snapshots

Sundry news in the last few weeks that is worth a mention is as follows:

+ Chinese car maker BYD has launched London's first all-electric cab fleet run by private hire operator Thriev. The Financial Times reported a spokesperson for the Mayor of London as saying "taxis account for more than a third of all exhaust emissions in the city". The Mayor has already announced that all new taxis licensed for use from the 1st January 2018 in London must be capable of operating in zero emission mode while in the areas of the worst air quality. What that means exactly is not clear at present.

+ Capita are taking over operation of the Congestion Charge Tax scheme when the current contract with IBM expires in October 2015. There was a competitive tender so there may be pressure to maximise profits and minimise service.

+ One of our readers recently got caught by the 20 mph average speed cameras on Tower Bridge. Readers are warned that you can get prosecuted for doing as little as 23 mph. *(Editor: a taxi driver told me he was caught doing 22 mph, and there are other reports on the internet).* If you get offered a speed awareness course, you might be asked to stand up in front of the class and say: "I am xxxxxxxxxxxx and I was caught speeding doing 23 mph and I regret the person I became that day". Note that the 20-mph speed limit was imposed allegedly on Tower Bridge to stop damage to the bridge by HGVs. It is not at all clear why it needs to be in place or enforced so vigorously for private cars or taxis.

+ 60 mph speed limits are being proposed for the M1 and now also for the M3 on the grounds of controlling air pollution. It is not at all obvious that speed limit reduction will have any significant effect on vehicle emissions because most of those come from HGVs and other heavy vehicles which are limited to lower speeds already. The ABD has submitted objections to these plans.

+ TfL have published their latest Annual Travel Survey. It shows that motor vehicle distances travelled are down by 22.8% since 2000 in Central London, by 16.1% in Inner London and by 8.1% in Outer London. But average traffic speeds have remained stable for the last six years. Cycling has continued to grow but the trend is slowing down.

+ New speed cameras to enforce "smart" motorway schemes (such as on the M25 where hard shoulder running is to be introduced) are being introduced. They are called HADECS 3. They are likely to be painted grey.

+ The "RideLondon FreeCycle" event sponsored by Prudential is to take place again this year on the 9th August, despite many complaints about the event last year. It will involve many road closures in London and Surrey.

(Editor's Comments: I simply do not see why those with desires to take part in a sporting event should monopolise public roads. It's a leisure activity in essence whereas many people have to travel on Saturday and they should not be inconvenienced. I have made clear my views both to the Mayor and TfL.)

+ TfL is to spend £290m on making London's roundabouts and gyratory systems less dangerous for cyclists and pedestrians. For example Aldgate (covered in our last edition), Archway, Swiss Cottage and Wandsworth will be improved. Typically this means changing a gyratory into a two-way road system. Elephant & Castle is also going to be improved as part of a major redevelopment of that area which has been planned for some time. In addition there are proposals being put forward in the City of London to remodel the roads between St. Pauls and London Wall (including the Museum of London roundabout).

+ The City of London is to proceed with a wide-area 20 mph scheme across the City although some roads such as Upper/Lower Thames Street will be exempt. *(Editor: having driven in Brighton recently I can't say it made much apparent difference. A local resident said that most people simply ignore it. It seems likely the Green Party will be ejected as the controlling party in the next council elections as residents are unhappy about this and other things promoted by Brighton council of late).*

But the London Borough of Barnet has come out against a wide area 20 mph limit. In a report they recommend they only be applied near schools or in other limited circumstances.

+ Worthing is the scene of another battle over 20-mph speed limits where there is very active opposition to the proposals. See <http://20spointless.org.uk/> for more information. A local bus company has threatened to stop running services if it is implemented and there has been support from the local press. The ABD has also provided support. *(Editor: if you have a problem in your local borough with such proposals, then contact me at the ABD for advice and possible assistance).*

+ Opposition to HS2 is growing and not just in the London boroughs where it will cause massive disruption while it is under construction. As Paul Withrington of Transport Watch has noted, it will cost £80bn, equivalent to about £3,000 for every household in the UK, but 99% of us will seldom if ever use such a train.

+ The subsidies for buses will rise to £435m in 2014/15 from £380m in 2013/14 according to Transport for London (TfL). Note that this does not include the total subsidies to London buses - for example fuel duties which they don't pay but everyone else has to.

Note that the ABD maintains a list of members who are familiar with individual London boroughs and may be able to help with information on local issues in those boroughs. The current list is below. If any other members would like to keep an eye on local news and advise on local transport issues then please let me know. Roger Lawson

Contact person	Borough	Email
Les Alden	Southwark	LHA@looksouth.net
Paul Hemsley	Ealing	ph@hemsleyassociates.com
Hillier Simmons	Hounslow	hilliersimmons@compuserve.com
Brian Mooney	Hammersmith & Fulham	fairdeal@abd.org.uk
Roger Lawson	Bromley, Barking & Dagenham, Barnet, Bexley, Brent, Greenwich, Hackney, Haringey, Havering, Islington, Lewisham, City of London, Newham, Redbridge, Tower Hamlets, Waltham Forest	roger.lawson@abd.org.uk
Peter Morgan	Croydon, Camden, Enfield, Harrow, Hillingdon, Kensington & Chelsea, Kingston, Lambeth, Merton, Richmond, Sutton, Wandsworth, Westminster	southlondon@abd.org.uk

Contact Information

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A.B.D. London Region Co-ordinator and Editor: Roger Lawson (Tel: 020-8467-2686, Email: roger.lawson@abd.org.uk). Contact the above for information on the aims and objectives of the A.B.D. or for membership information (membership costs £25.00 per annum). The A.B.D. would be happy to advise or assist anyone who is concerned about any traffic, transport or road safety issues in London. Complimentary subscriptions to this newsletter are available on request to elected politicians or those with a professional interest in transport matters.

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About the Alliance of British Drivers (ABD)

The Alliance of British Drivers was formed from a merger of the Association of British Drivers and the Drivers Alliance. 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 Alliance 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.abd.org.uk

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