

# ABD London News

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## Editorial

This newsletter covers a bout of public consultations on major new road schemes in London and the proposed Ultra Low Emission Zone. In general the quality of these consultations is very poor with inadequate data being provided and not much in the way of any cost– benefit analysis.

That's not to say that I oppose the new Silvertown river crossing. As David Leam of First Direct said recently in a Financial Times article, *"The same or similar proposals keep re-emerging because the fundamentals haven't radically changed. They all point to the need for new crossings in the east."*

The proposals for a new Ultra Low Emission Zone I see much less justification for. Particularly there is no justification given for imposing it on private cars of all types for all hours of the day and night. In addition it introduces a dangerous principle that the Mayor of London can devise regulations for vehicles in London alone. In other words he can override national regulations and invent new ones.



This is exceedingly dangerous principle when many of the vehicles driven in London actually come from outside London. In some cases from hundreds of miles away. How is someone from Scotland, or France, expected to know the regulations in London? It just makes life more and more complex and difficult for the average road user. Introduction of pre-pay or free flow tolls as at Dartford (picture above) from Nov 30th is another example. We do need to restore more freedom to drivers.

Roger Lawson (Editor)  
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## Quotes of the Month

*"Currently, buses make up some 13% of total demand, taxis some 30% and so only buses and half the current number of taxis could effectively utilise all available capacity in the PM peak".....*

Martin Low explaining the impact of the proposed East-West Cycle Superhighway on the junction at the North-West corner of Parliament Square.

*"To make an informed, rounded judgment it will be necessary to quantify the magnitude of these disbenefits and to set them against the magnitudes of the benefits anticipated for the schemes. A proper business case needs to be published...".....*

RAC Foundation on the East-West Cycle Superhighway.  
*"Slowing everyone down does not deliver safer roads"....*Headline in LTT on an article by the ABD's Malcolm Heymer. See 20 mph schemes on page 5.



# Silvertown Tunnel Consultation

The Mayor of London is consulting on proposals for a new road tunnel under the Thames at Silvertown—to run alongside the existing Blackwall Tunnel.

As anyone who lives on the eastern side of London knows, the Blackwall Tunnel is now severely congested during rush hours. Indeed the slightest incident even in the middle of the day can create long delays, and there are over 1,000 “incidents” every year! The photograph top right taken from the consultation documents rather understates the position. There is not just congestion at the tunnel mouths but often running back some miles. With the population of East London expanding more crossings east of Tower Bridge are urgently needed.

The proposal is for a twin bore tunnel with a cost of £750m and it could be open by 2022. There will be no height restrictions as on the existing tunnels, but one lane will be reserved for buses and heavy goods vehicles.



Pedestrians and cyclists will not be allowed to use it, but the Emirates Cable Car is available for them.

A charge will be imposed on both the existing Blackwall Tunnel and the new Tunnel to “help manage demand and help pay for the Tunnel” as TfL put it. It is proposed the charges will be broadly similar to the Dartford Crossing, i.e. £2.50 for cars, but the charge would vary by time of travel and direction, i.e. more in the morning rush hour north bound seems likely. How much more is not specified. But traffic congestion would undoubtedly be reduced.

Overall, with the changes in traffic flows and the reduction in congestion, it is expected the levels of emissions across the area in 2021 with the new tunnel will be lower than the level of emissions to be expected without it.

The consultation closes on December 19th so please submit your comments before then, at: [www.tfl.gov.uk/silvertown-tunnel](http://www.tfl.gov.uk/silvertown-tunnel)

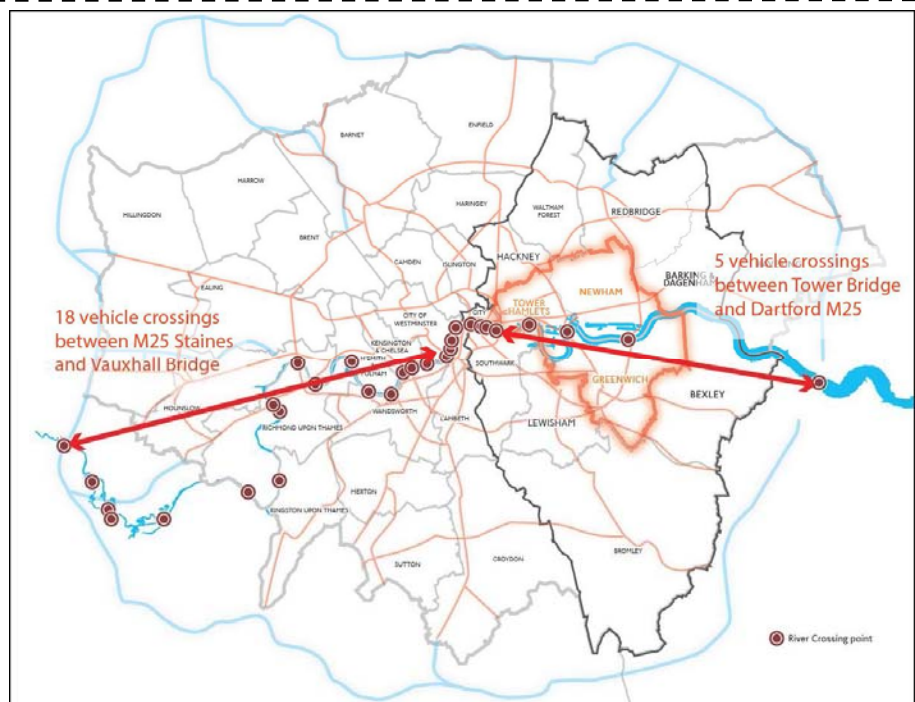
There seems no good reason to oppose this proposal, but a few more comments are given below.



It is surely wise to support this proposal and encourage the Mayor and TfL to get on with it. The only contentious issue is whether there should be a charge imposed. As you can see from the map on the right, there are many river crossings west of Tower Bridge, but few to the east. All the western ones are free and will remain so.

Why should those who live to the east have to pay when those who live to the west do not?

The question of charging for the Rotherhithe Tunnel, or increased traffic there otherwise, might also be an issue but it is not raised in the consultation. But submit your comments on-line a.s.a.p.





# East-West Cycle Superhighway

There is mounting opposition to the proposed East-West Cycle Superhighway despite the formal consultation now being closed. The main complaints are that this will reduce a key east-west route to one lane from two over much of its length thus creating large delays and extra congestion.

The consultation was grossly defective, personified by the “artist’s impression” top right of how it might look at Blackfriars. Clearly a great deal of imagination went into that! Hardly any road vehicles and no HGVs.

That’s very unlike what it might be in reality.

Howard Dawber, who works for the Canary Wharf Group, appeared on BBC TV News spelling out the implications, such as the need to “gate” traffic on the approaches to central London to avoid congestion becoming intolerable. A number of organisations (apart from the ABD of course) have expressed opposition or concerns including the Licensed Taxi Drivers Association, the RHA, the FTA and coach operators. Even the City of London Corporation



spelled out concerns in their response to the public consultation with comments such as requests to “Consider alternative design measures to ensure a resilient, road network and demonstrate how the network will accommodate planned and unplanned road works”.



Plus they suggested “TfL and City officers work together to achieve an acceptable outcome. This may require changes in the process and governance that TfL has adopted up to now, an extension to the consultation deadline so that the further modelling information can be fully assessed, the needs of building developments, special events and construction impact mitigation”. Those comments are clearly a polite way of stating that the approach by TfL (Transport for London) so far has been unacceptable. But that is often the case with TfL who have a reputation for undemocratic approaches to public consultation.

But you should be warned that the Mayor’s Cycling Commissioner has said that 80% of responses to the public consultation were in favour. This is no doubt because of the active lobbying by cycling groups.

As regards the consultation, this is what the RAC Foundation had to say:

*“Insufficient information has been published for us—or anybody else—to form a rounded view of the merits of these proposals. Therefore we neither support nor oppose these schemes. There may be sufficient advantage to outweigh the considerable costs and disadvantages, but a case is not offered.*

*This is a large scheme. The proposal to restrict the flow of vehicles into the area of the schemes is likely to have significant impacts over much of Central London. This is illustrated by the examples TfL have published as part of the consultation.*

*These examples confirm that road users (buses, cyclists, pedestrians, taxis, private hire, commercial vehicles and private*

*vehicles) over a large area of Central London would be adversely affected, some of them seriously so. The disbenefits to a large number of road users of all types (including bus users and pedestrians) across a large area of Central London would appear to be very substantial.”*

Yes it is clear that only cyclists will benefit from these proposals, who of course are a small minority of road users in central London, while buses, taxis, private cars, good vehicles and even pedestrians will be disadvantaged.

**It is not too late to stop this project but if you have not done so yet, please object immediately. Write directly to Boris Johnson using this email address: [mayor@london.gov.uk](mailto:mayor@london.gov.uk) (put your postal address in the email) or contact your GLA Member.**

# Vauxhall Cross Redesign

Another public consultation that ends on December 19th is that of the redesign of the roads around Vauxhall Cross. This is another of those attempts to remove “gyratory” systems so as to replace one way traffic by two way traffic. This is seen as being safer for pedestrians and cyclists. It is unfortunate that previous examples of this such as Aldgate and Trafalgar Square have been very damaging to road traffic movements and have added to congestion.

However it is certainly true that the existing layout can be confusing even for drivers and lane changes are sometimes difficult.

The “public realm” is also quite ugly and the whole area could do with some “regeneration” to use the common planning speak.

A plan of the proposed new road layout is given below. But there has been no traffic modelling done on the new layout and there are few other details provided—no cost/benefit justification and no costs at all provided for example.

This is what TfL have to say on the Traffic Impacts:

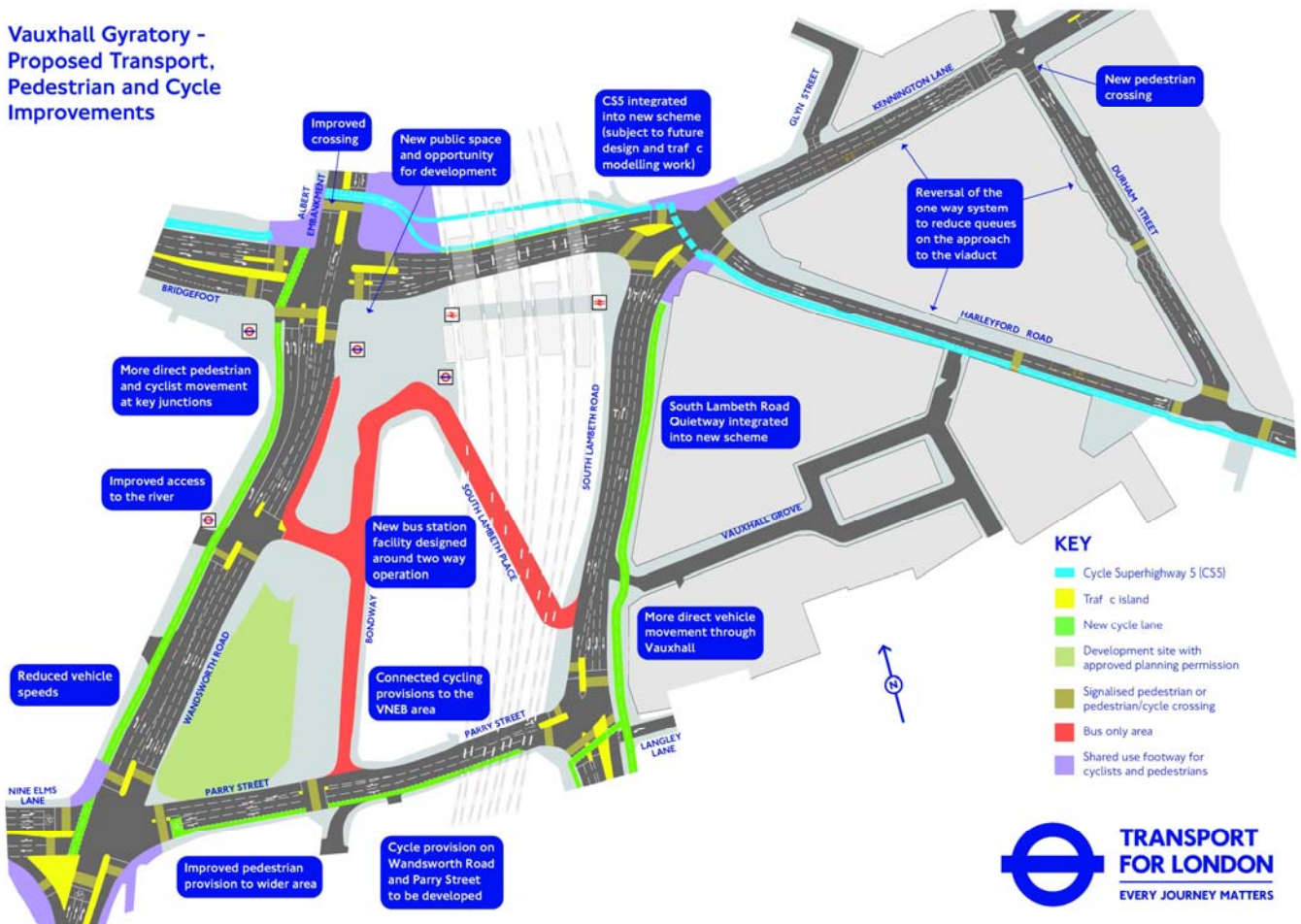
“Preliminary traffic modelling results have shown that traffic movement around the local area would change.

This would mean changes to traffic levels in different locations around the scheme, and could result in either an increase or decrease in journey times on various routes during the peak hours.

Following the initial stage of the public consultation, and taking into account comments received, further traffic modelling will be carried out to understand the detailed impact of the proposals and how we would need to improve the roads and junctions to manage this change in traffic levels. This work will be shared in the second stage of public consultation in late 2015.”

For more details and to respond to the consultation, go to this web page:  
<https://consultations.tfl.gov.uk/roads/vauxhall-cross>

## Vauxhall Gyratory - Proposed Transport, Pedestrian and Cycle Improvements





## 20 Mph Schemes

One of the most contentious battles over a wide area 20-mph scheme has been fought in Worthing. The protagonists were 20sPlenty, that well known and vociferous supporter of 20 mph limits, and a local group formed to oppose the proposals called 20sPointless—see their web site here: <http://20spointless.org.uk/>.

The local council undertook a public consultation in which over 69% of the respondents opposed the proposal, so councillors voted unanimously to scrap the idea. This is what Roger Graham, speaking for 20's Pointless, said at the council meeting "*He (Mr Kay, the promoter of the scheme) came to the CLC with a petition, asking the public whether they wanted a 20mph scheme. They don't. They don't. They massively don't.*"

*And here he is today asking the CLC to ignore the very vote he was so keen to have.*

*It does not do when the person who does not succeed then stands up as an amateur lawyer to pick holes in the way that campaign was conducted."*

Note that the consultation exercise cost £26,000 plus council staff time. One oddity of the consultation was that even children were invited to respond—they also voted against the proposals.

To the right is one of the advertisements the opposing campaign ran in the local press.

**Editor's Comments:** The ABD supported this campaign to thwart these proposals but it is down to the local activists that it was successful.



YOUR SPEED 30 YOUR SPEED 30  
**20's pointless**  
Say NO to a 20mph speed limit in Worthing

There is a public consultation as to whether most roads in Worthing should be reduced to 20mph. You will receive your voting slip from the council shortly. For more info please see our website.

**Vote NO to 20mph**  
A 20mph speed limit in Worthing will

- ☹️ **NOT** reduce serious accidents **BUT WILL**
- ☹️ **Reduce bus services**
- ☹️ **Increase pollution & congestion**
- ☹️ **Increase driver frustration**
- ☹️ **Waste £350,000+ of your money**

**[www.20spointless.org.uk](http://www.20spointless.org.uk)**  
Campaign supported by the Alliance of British Drivers [www.abd.org.uk](http://www.abd.org.uk)

However it clearly demonstrates that it is possible to defeat the misinformation spread by 20sPlenty about the supposed benefits of 20 mph zones. You just need to ensure there is a proper public consultation and then get your message across. Make sure you contact the ABD if you have such proposals locally.



Note that the borough of Hammersmith & Fulham in London is to undertake a consultation on imposing a 20mph speed limit on all residential roads, but it will not take place until April 2015.

In Camden where they already have a wide area 20mph scheme, at a cost of £262,233 a recent Freedom of Information Act request showed that the impact of the limit has been mixed, with some streets showing increased speed and others showing a decrease. It is too early to judge any impact on road accidents.

The London Borough of Merton has also published a review of their 20mph zones.

The study covered the period of 2007 to 2011, and included both traffic flow and before/after accident data.

**Across the zones, the accident rate went up from 10.5 personal injury accidents (PIA) per year beforehand, to 15 per year after the 20 mph zones were implemented. Similarly there were increases in PIAs where there were simple 20mph limits imposed.**

The conclusions drawn were that both zones and limits **experienced an increase in PIA**, but in "limits" there was a reduction in pedestrian and child accidents. Vehicle speeds were reduced for both zones and limits.

The full analysis can be obtained from the internet.

Although the data is limited (particularly as regards the post implementation duration), it surely demonstrates that it is doubtful that there are any road safety benefits from the introduction of 20 mph schemes. Indeed the opposite may be the case as has been demonstrated in other locations in the UK.

But that does not deter other London councils from putting forward such schemes. Lewisham is the latest one. Will there be a proper consultation on this? It seems unlikely knowing democracy in Lewisham.

## Ultra Low Emission Zone Consultation

Another important public consultation is that on the introduction of an Ultra Low Emission Zone (ULEZ) in central London. The ULEZ may improve air quality and reduce CO<sub>2</sub> emissions.

In this case, you have until the 9th January to respond. The ABD has already responded to this and the other consultations mentioned in this newsletter but it is important for individuals to respond also.

To quote from the consultation: "The ULEZ is part of a range of measures to reduce emissions resulting from road transport across London.

- A 10 year maximum age limit for non zero emission capable taxis from 2020; (irrespective of date of licensing). All taxis will be exempt from the ULEZ standards;
- Zero emission capable taxis will have a 15 year maximum age limit;
- All PHVs driving in central London must meet the ULEZ standards from 2020 or pay a daily charge."

Although air pollution in London has been improving there are still certain areas where concentrations of NOX and Particulates are excessive and a danger to health.

It is expected to make a significant contribution to meeting legal limits for pollution and will improve public health in London.

If approved by the Mayor, the ULEZ would require all vehicles driving in central London to meet specific exhaust emissions standards (ULEZ standards) in order to drive in the zone without paying a charge. It would operate in the same area as the Congestion Charging Zone and operate 24 hours a day, 365 days a year.

This would be in addition to the London-wide emissions standard for heavy vehicles which is already in place under the London Low Emission Zone (LEZ). ULEZ charges would be payable in addition to any applicable LEZ or CCZ charges.

The latter are mainly emitted by diesel vehicles, particularly buses, HGVs, LGVs and older taxis but the increased number of diesel cars is also contributing.

The proposals are aimed at discouraging the use of polluting vehicles by charging to enter a central zone if they are not compliant, and encouraging such things as "emission based permit parking charges" - yes the very measure so opposed by the residents of Richmond.

Proposals for "Low Emission Neighbourhoods (LEN) are also put forward with workplace parking levies, preferential parking for Low Emission Vehicles and similar other measures.

The ULEZ charge for non-compliant light vehicles, such as cars and vans, would be £12.50 a day [note: that's additional to the Congestion Tax making the charge to drive into central London £24 for some cars]. For heavier vehicles, such as lorries and coaches, it would be £100 a day. It is proposed that the ULEZ standards would be enforced using the existing camera network and failure to pay would result in a penalty charge notice.

The ULEZ proposals also require changes to the taxi and private hire vehicle (PHV) licensing requirements. Together, this will mean:

- All new taxis and PHVs must be zero emission capable from 2018;



One innovative idea is "Geo-fencing" where hybrid vehicles are forced to run in electric mode (e.g. buses on Oxford Street).

A particular problem is that diesel vehicles may need to be Euro 6 compliant re emissions to avoid a charge. There are few such cars on the road at present so many existing vehicles will be very expensive to use after 2020. By 2025, we might all have to be driving electric cars in London or pay for the privilege!

It is of course not at all clear how much benefit is obtained from imposing such rigorous regulations on private cars when they are a very small contributor to overall pollution levels.

For more details and to respond to the ULEZ consultation, go to this web page:  
[https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/consult\\_view](https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/consult_view)

## Miscellaneous News

- Brandon Lewis, a Government Minister, wants London to scrap its "Maximum" parking standards. He says the London Plan is inconsistent with national policy. It is currently in the hands of an Inspector but London Transport Commissioner Peter Hendy opposed the change. Comment: the maximum standards are set too low with the result that on-street parking is used instead. This is a particular problem for outer London boroughs,

- Free-flow tolling commences at the Dartford Crossing on November 30th. In other words, you can't pay cash at the toll booths because there won't be any. You have to pay in advance, or soon after—for more information see [www.gov.uk/dart-charge](http://www.gov.uk/dart-charge) .

The fee will rise to £2.50 and if you don't pay it then a fine of £35 will be issued. So don't forget as many people do with the London Congestion Tax!



- Transport for London (TfL) have revealed that the cycle hire scheme is poor in terms of cost/benefits. For every £1 spent on it, only 70p of benefits is delivered. The implementation cost was £133m and trip numbers and revenues were well below forecast.

- The London Borough of Richmond has rejected a borough wide and two wide area 20mph speed limit proposals. Residents were consulted but the council decided there was "no conclusive mandate" to impose such limits on either residential or main roads.

- TfL claim the Congestion Charge has cut road accidents despite increases in average speeds within the central zone—as much as one third reduction is claimed. But Stephen Glaister of the RAC Foundation pointed out the explanation may be simple. The congestion tax has discouraged the occasional visitor so there is now a higher percentage of "professional" drivers on those roads. Such drivers know the roads better and also may take more care of their licences and vehicles, and hence drive more safely.



- We have mentioned the planning proposal for a new car park on disused and derelict land at Chislehurst Station before. Opposed by some local residents and council planning staff but approved by councillors.

The car park is now open. Before and after pictures are shown above and below. Surely a definite improvement! It will help to relieve pressure on local roads where the demand for parking by those using "rail-heading" (i.e. commuters who drive to a station and take the train into London from there because it is cheaper) has been growing.



- A survey by the AA reported that 17% of Londoners would not give way to emergency service vehicles by entering a bus lane, and 18% would not enter a yellow box junction. This is much higher than the numbers outside of London.

*Editor's Comment: no doubt the explanation is simple. Only in London do we have automatic enforcement via cameras with no discretion used if you "make a representation" or appeal. Giving way to an emergency vehicle is not an excuse.*







## Registering to Receive This Newsletter

This newsletter is free of charge and is sent approximately bi-monthly to anyone who cares to request a copy. It is sent via email (as a link to a web page from which you can download it). To register for a free copy simply go to this web page: [www.freedomfordrivers.org/Newsletters.htm](http://www.freedomfordrivers.org/Newsletters.htm) and fill out the box to be added to our mailing list.

## Address Changes

Don't forget to notify the ABD of any change of postal or email addresses. You may otherwise miss out on future copies of this newsletter without noticing that they are no longer being delivered.

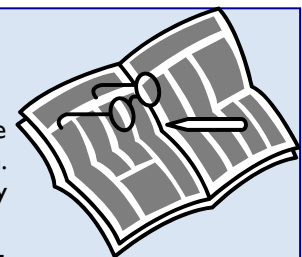
## About the Alliance of British Drivers (ABD)

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](http://www.abd.org.uk)

Local London Contacts	Contact Person	Borough	E-Mail
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 to the right.	Les Alden	Southwark	<a href="mailto:LHA@looksouth.net">LHA@looksouth.net</a>
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This Newsletter is published by the London Region of the Alliance of British (A.B.D.), PO Box 62, Chislehurst, Kent, BR7 5YB and is distributed free of charge to ABD Members in the London area and to anyone else who has an interest in traffic and transport issues in London. All material contained herein is Copyright of the A.B.D. or of the respective authors and may only be reproduced with permission. Any opinions expressed herein are solely those of the author of the article or that of the Editor which do not necessarily represent the official policies of the A.B.D.



A.B.D. London Region Co-ordinator and Editor: Roger Lawson (Tel: 020-8467-2686, Email: [roger.lawson@abd.org.uk](mailto: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 anyone with an interest in transport matters.

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