



The Association of British Drivers

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Isabel Dedring
Deputy Mayor for Transport
Roads Task Force Secretariat

Via email: RoadsTaskForce@tfl.gov.uk

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Roads Task Force Consultation Response

Dear Ms Dedring,

In response to your request for responses on the issues to be considered by the Roads Task Force, we have the following comments (under your headings, with some further comments at the end):

1. Challenges - What are the main challenges facing London's roads, over the short medium and long term?

A – Traffic Congestion. It is a truism that the capacity of London's roads has been insufficient to meet the demand for road space, and this was true even in the horse drawn vehicle era. So there has to be some way of rationing the demand for space, or resolving the conflicting needs of different kinds of users (who may occupy more or less space and at different times).

At present, the rationing of road space nationally to meet demand takes place by imposing a time (and hence money) cost on those who choose to use the roads when they are most congested.

There are also financial penalties to discourage excessive use by the high costs of vehicle use imposed by national Governments, and in particular the high costs of taxation on fuel which is directly related to usage.

Of course in London we also have the Congestion Tax (or "Charge" as it is euphemistically called) which sought to deter certain types of road users (but not all by artificially classifying road users by their vehicle types in "worthy" and "unworthy") from entering the most congested parts of London for most of the day.

This of course proved to not only be very unsuccessful in reducing congestion as it mainly just shifted the composition of vehicles on those roads, but also imposed very high costs on only the "unworthy". It also was one of the most inefficient ways ever invented to raise funds for public benefit via taxation as almost all the revenue raised is spent on operating the system.

There is of course also the potential threat of the growth in the population of London, and the general trend in increasing wealth which might result in more private cars being owned. In addition more buses and taxis might be brought into service as population growth makes more frequent and more availability of services economic.

This trend has of course potentially been present in the last ten years but is not supported by the evidence. The London Travel Demand Survey shows that between the 2001 and the 2007/10 surveys there was a fall of 5% in car ownership in London even though the population rose by 8%. In addition there have been surveys of traffic volumes in London in that period which frequently reported declines.

The higher cost of motoring and other factors are probably behind these trends, so it would be wrong to assume that London traffic congestion is going to worsen simply because of the growth in population. It is simply a myth that we will all suffer from gridlock unless additional "demand management" or "rationing" of some form is brought in as some have alleged.

The ABD would be opposed to any such ideas, and believes that the existing self-regulatory rationing mechanisms imposed by congestion are by far the most equitable approach, and we suggest the London Congestion Tax (aka "Charge") should be scrapped.

However, we do understand that there is public concern on traffic congestion and the delays it creates obviously impose a significant cost on members of the public and on commercial firms who need to transport goods via London's roads. We therefore do support measures to tackle this issue and cover those in Part 3.

B – Road safety. The encouragement of cycling and powered 2-wheel vehicles by both policy and the increased cost of bus and tube/train fares is creating a short-term challenge to the reduction in road casualty figures. Pedal cycles are particularly dangerous to the riders (in comparison with other transport modes), especially so when they are ridden at speeds in excess of 15mph, as they often are now, as cycle helmets provide little protection to a rider above that speed if they are involved in an accident (of their own making or otherwise). See Part 3 for what we suggest be considered in regard to that.

In the short term one of our other major concerns is the expenditure on dogmatic solutions to road safety rather than giving proper consideration to the cost/benefits of other options.

For example there is a strong demand from amateur experts on road safety matters for the implementation of widespread 20-mph zones by the simple measure (but costly) of just putting up signs.

This has been shown to not be effective in reducing casualties where it has been tried (e.g. in Portsmouth), has minimal impact on traffic speeds and is definitely not cost/effective in comparison with other road safety approaches.

Likewise it has recently been reported that TfL are to spend up to £15m on eight average speed cameras systems despite the fact that they are not obviously cost effective and do not have general public support.

Similarly they are reporting to be budgeting for expenditure of up to £77m on digital speed camera systems to replace existing film cameras. What is the justification for this expenditure? Would it not be better to re-engineer the roads to reduce the danger spots which will be a permanent solution rather than repeated expenditure on replacing camera systems with the associated costs of operating them? Unfortunately the economics of that, or even the simpler alternative of vehicle activated signage has never been examined by TfL.

C – Air Quality. Although air quality in London is improving, we still see it as a long-term challenge to reduce air pollution from road vehicles. This is particularly so from taxis, buses, HGVs and LGVs which are frequently diesel powered and often have a considerable proportion of older vehicles in their fleets. As older vehicles are scrapped, the situation will improve, but it will still leave some problems in regards to certain emissions such as particulates.

Note that we are not referring to CO2 emissions in the above paragraph which we suggest are of lesser concern and will probably reduce from road transport use in the next few years (vehicle numbers will probably not grow as we suggest above, and they are becoming more efficient anyway). In comparison with the growth in such emissions from housing and business activities due to the growth in population, there is simply no issue here.

D – Excessive Subsidies. We suggest one issue that needs to be examined is the massive subsidies that still exist for bus transport (only forecast to fall to £440m per annum in 2015 according to the last TfL Business Plan the author saw). Is that level of subsidy sustainable bearing in mind that it requires support from national Government when such support might not be obtainable given the parlous state of the finances of our Government – with no sign it will improve in the near future?

Although the absolute level of subsidy has come down since Mr Johnson became Mayor, by some rationalization of the bus network, in the long term it is still financially questionable. In addition, the aging population and the recent decision to retain the 60 age limit for free access to the public transport network will encourage more use than there would otherwise be, adding to the burden on the public finances (and on the tax that London residents have to pay to subsidise these). These subsidies to buses actually create traffic congestion in many cases as “bus jams” frequently occur on some roads and buses in general are slower moving than other vehicles, frequently stop/start, and hinder the free flow of traffic.

2. The Approach (competing demands...).

A – Resolving Competing Demands. The question posed here is somewhat difficult to understand. For example, it refers to the question of London’s roads and “their role as public spaces”. Roads are not public spaces in the normal sense of that word, except that they are publicly open to pedestrians and vehicular users. They are not parks, public squares, play spaces or street markets.

They are designed to enable the movement of people and goods and that should be their primary purpose – anything else is purely secondary.

But there is obviously the issue of the allocation of road space between different users – powered vehicles, cyclists and pedestrians. We do not believe in any absolute priority for some users over others. The appropriate allocation must be based on the circumstances of each location, the congestion it might prevent or generate among each class of road user, and the likely volume of people/goods (and the economic benefit or cost thereby) that each mode might provide.

For example, if there is pavement congestion due to an excess of pedestrians at a particular point on a narrow pavement (which might create a safety hazard which has a potential cost), then it might be meritorious to widen the pavement to the detriment of road vehicles. But if that creates congestion (where there are no alternative routes or other ways of providing extra capacity) and hence costs for those vehicle users then it might not be wise to do so. The ultimate decision should be based on economic calculations, not dogma about the worthiness of any class of road users.

Likewise, when deciding whether more road space should be allocated to cyclists (although they can normally share space with other road users), or reserved for buses (e.g. in the form of bus lanes), then this should be decided simply on the volumes of people and their time costs (and the value of goods transported) by each respective mode.

B – A Rational Approach to Developing the Road Network. One thing we wish to emphasise is that we need to step back and look at how the road network can be improved. The objective to bear in mind is how the movement of people and goods can be expedited, and congestion reduced, in the longer term so as to improve the economic efficiency of the network. We need an engineering approach to developing a plan for the whole road network in London which meets that single, primary objective. This has never been examined in recent years, and was certainly not included in the last Mayor's Transport Strategy policy document.

3. Solutions. The Approach (competing demands...).

A – Resolving Competing Demands. As indicated above, we suggest that attention be paid to the development of a consistent strategic road network in London. There are many parts of London where the road network is particularly poor or disjointed. For example South London is particularly badly served in that regards with the "south circular" being a joke which only ignorant road users from outside London would ever consider using. We need more orbital routes and more reliable and higher volume routes between regional centres.

In addition Thames river crossings on the East side of London are a long standing problem with the Blackwall Tunnel over-used, the Woolwich Ferries needing replacement soon, and it is a long time before any new bridge is likely to be available. A high priority needs to be placed on that project.

There are often particular bottlenecks in some boroughs where the local borough council has obstructed improvement to their road network on fallacious grounds. This affects all vehicle users - private vehicles, buses, goods vehicles, etc.

B – Traffic Congestion. Obviously we are aware that new road capacity is often difficult to provide in London – but not always. There should be no presumption against increasing road capacity if that is the most economic way of improving transport capability. Indeed we would like to see a significant increase in capacity by road widening and tackling junction bottlenecks in the next few years so as to reduce congestion.

Moreover, we do suggest that the reduction in road capacity that has taken place in the last few years, by the closure of roads, the narrowing of roads and the removal of gyratory systems should be halted.

For the same reasons, we are generally opposed to new tram schemes which have been demonstrated repeatedly to be uneconomic (in the sense that the users don't seem willing to pay for them) and which impose negative benefits on other road users if run "on-street".

Otherwise we generally support the steps that have been taken lately to reduce congestion. More computer control of the network is one such measure, tackling road works another. As regards the removal of traffic lights, which have proliferated in the last ten years, we think that more vigorous steps should be taken to remove unnecessary ones, or to review their timings, than we have seen to date. Otherwise reducing congestion is best tackled by looking at individual roads and the nature of their problems.

We also suggest that the removal of speed humps, choke points and other "traffic calming measures" would also improve traffic flows without having any negative impact on road safety whatsoever. Indeed we suggest that the wider use of "shared space" concepts might improve traffic flow and avoid conflicts between different road user modes. However these need to be well designed which they have not always been in the past, i.e. specifically designed for the circumstances, with proper and full consultation on them.

C - Bus Lanes. We suggest all existing bus lanes should be reviewed and those that do not support the transport of more people per hour than would otherwise be transported if the lane was open to private cars and taxis should be removed.

D – Variation Across London. The question is posed as to how the "Solutions" might vary across London. We do not see any great difference in principle between different parts of London. The decision should still be primarily economic. However cycling might certainly be more encouraged in central London where distances travelled might be shorter, and less so in outer London where distances are longer or the terrain is hilly enough to discourage cycling.

Some might argue that the road network might be reduced in central London because of the greater availability of public transport or because users could cycle; or less priority put on improving it. We do not support that argument for a number of reasons. For example, most goods are moved by road transport and cannot be shifted to public transport. Some vehicle users cannot use public transport easily, or the nature of their trip or their destination prohibits its use. Other people are not capable of cycling.

Road users should be free to choose their mode of transport, whether it be walking, cycling, using public transport or using private vehicles. They should not be forced or cajoled into using particular modes based on political dogma.

E - Road Safety. We mentioned above the question of improving road safety with the increased use of cycling. We would suggest that where off road cycle lanes can be provided economically that this be considered (but not simply by taking existing road space and dedicating it to cyclists). For example, the recent suggestion for a "high level" cycle network alongside rail lines is certainly worth investigating.

The construction of more cycle "superhighways" where there is sufficient potential user demand could obviously be considered but we think that more attention has to be paid to careful design to avoid conflicts with other road users at junctions which is a defect of some of the existing ones.

F – Air Quality. We would like to see more encouragement for users of polluting vehicles (particularly older buses, HGV, LGVs and taxis) to switch to newer or lower emitting versions. In addition we support "spot" measures to tackle pollution on the few streets in London where there is heavy pollution. For example by trying to smooth traffic flows, using low emission public service vehicles on those routes and some of the other measures that are being tried.

4. Delivery. The Options to Prioritise....

The prioritization of policies should be strictly based on economic criteria. All benefits can be reduced to economic value if an appropriate methodology is applied (although it is often done so in an incorrect manner for road safety projects or air pollution costs where a subjective assignment of "value" is commonly applied).

So new road construction, or traffic congestion reduction projects, should be based on the economic benefit that might result. Those with the most benefit should be considered first. But given that, there is clearly also a "network" benefit in having a joined up and co-ordinated road network, which we simply do not have at present. The financial benefit of having one should be studied as a first step in developing a plan for London's roads.

Obviously there are limitations to finance, but if the massive and unnecessary subsidy to buses was redirected then it might provide substantial funding. The Freedom Pass should likewise be reformed to reduce the unnecessary subsidy that it provides. It seems simply irrational to encourage bus users to travel, and hence to consume resources, emit pollutants from the vehicles they occupy and take up valuable road space, all at zero cost to themselves – this simply motivates people to use scarce resources without any thought to their cost at all.

The London Congestion Tax (aka "Charge") is also an enormous waste of resources which provides minimal financial benefit. We do not believe that the true costs of installing, managing and regulating this scheme have been taken into account. By simply scrapping it and devoting all the resources thereby applied to other matters, major benefits could be achieved. It is also a tax that bears more heavily on the poor than the wealthy, which is never a good principle to follow.

Conclusion

In conclusion, and bearing in mind we represent individual road users, we are keen to see the prejudice against personal transport modes of all kinds halted. There is too much money spent on public transport schemes as opposed to providing for private car users, motorcyclists, pedal cyclists and pedestrians.

We are also absolutely opposed to the classification of road users on any criteria into "worthy" and "unworthy" which we have seen so often in the past in the politics of transport in London. All people are equal. There should be no discrimination between them based on which transport mode they care to use, so long as they pay a fair cost for the services they use (and road vehicle users pay more in taxes by a factor of several times over the costs associated with the provision and maintenance of roads).

Yours sincerely

Roger Lawson
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

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