



The Alliance of British Drivers

London Region: PO Box 62, Chislehurst, Kent, BR7 5YB

Tel: 020-8295-0378; www.freedomfordrivers.org

City of London Corporation

Via email: strategic.transportation@cityoflondon.gov.uk

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Response to Consultation on Draft Transport Strategy

Dear Sirs,

Please consider this as our formal response to your consultation on the proposed Transport Strategy for the City of London.

First a general comment. I wrote to Christopher Hayward, Chairman of the Streets and Walkways Sub-Committee in February of 2018 pointing out that the composition of the Strategy Board contained no representatives of transport users. Specifically I said there are "no representatives of taxi drivers, no representatives of PHV owners, no representatives of private motorists (we are one such organisation), no representatives of freight users (e.g. the Freight Transport Association) and not even any representatives of cycling groups". That comment was ignored and we now have a Transport Strategy that seems to be biased against all forms of transport. This is an astonishing result to say the least. To develop a Transport Strategy that ignores transport users is plain ridiculous and it is very obvious that the result is going to have negative consequences for many aspects of life in the City, and will impose very high costs on those who need to use transport for the movement of either people or goods.

The authors of the Transport Strategy seem to assume that the only people who commute into the city via surface train or underground, and otherwise walk, are the only people whose views need to be taken into account. Such people may form by far the largest proportion of those in the City during the day, but it ignores the essential needs of those delivering goods in the City, or even those of the residents who live there. It also ignores the needs of those who use cars or other vehicles for specific reasons, e.g. the disabled and elderly or those who are using them for other reasons such as carrying goods, taking journeys that are to elsewhere but require intermediate stops in the City, taking trips out of the City to locations not easily accessible by public transport or for numerous other reasons.

There are now very few people who commute into the City via car, partly because the road network has been deliberately degraded in recent years and access to the City made more and more difficult. The justification for these changes and the proposals in the draft Transport Strategy simply do not exist. None of the proposals in the latter document have any cost/benefit justification provided. They are simply irrational policies dreamt up by those who apparently know little about transport issues.

Of course many of the policies emanate from those in the Mayor London's Transport policies. The Mayor seems to believe that London's streets should be for "active travel and social interaction....". This is nonsense. Roads are for moving people and goods. If people need exercise, or social interaction, there are many other ways they can obtain that without taking up scarce road space.

As regards the comments about the consultation process on page 12 of the Transport Strategy document, as someone who participated in one of the "workshops" on this subject, I can only say that the reported "themes" do not actually match the discussions that took place in the workshop. I did a report on the workshop which can be read here:

<https://abdlondon.wordpress.com/2018/03/08/city-of-london-transport-strategy/> . It was very clear that the people attending had some very peculiar ideas and also had little knowledge about transport issues. How that could be condensed into the reported "themes" I have no idea. It looks more to me that transport planners in the City Corporation made up their own minds about what they wanted to do and have presented these ideas as being the results of the consultation exercise. A very dubious process indeed!

I comment on each of the Proposals below (major objections are highlighted in red):

Proposal 1. Embed the Healthy Streets Approach in transport planning and delivery.

The "Healthy Streets" approach is really mumbo-jumbo of the worst kind. The objectives include "people feel relaxed" and "pedestrians from all walks of life". How are they to be measured? Purely subjectively no doubt. Another objective is "people choose to walk, cycle and use public transport" which basically says that street design will be biased against all vehicles – an unreasonable and unjustifiable proposition.

We do not object to the provision of better pavements and more space for pedestrians where there is over-crowding at present, but there needs to be a sensible and rational balance between the users of different transport modes. The allegations in the report (such as "only 10% of people rate the experience of walking in the Square Mile as pleasant") do not match the reality and are fed I suspect by asking leading questions in surveys. Is there really a major problem faced by pedestrians in the City that would justify the extreme measures against vehicles that are proposed? I do not think so. For example, crossing roads in the City is generally easy because traffic moves slowly and there are plenty of crossing points such as zebra crossings that can be used.

Proposal 2. Put the needs of people walking first when designing and managing our streets.

As made clear above, we do not support this simplistic approach to street design. As there are different users of streets who have differing objectives and purposes, street design should be a rational compromise between their different needs. To prejudice road transport or cyclists on the sole basis that pedestrians should have priority is wrong.

Proposal 3. Complete the riverside walkway.....

Improving pedestrian crossings on Upper/Lower Thames Street would certainly be helpful but there is a problem here in that the road concerned is a major east-west route for vehicular traffic. Adding more pedestrian crossing points would add more traffic congestion to a route that is already very congested – particularly after the misconceived cycle superhighway was installed.

Proposal 4. Enhance the Barbican High Walks.

These are not used as much as they could be because signage and access points are poor. Even those familiar with the City can easily get lost at present. So it would certainly be preferable to improve these walks.

Proposal 5. Ensure new developments contribute to improving the experience of walking and spending time on the City's streets.

This is certainly a laudable objective. If more space for pedestrians is to be provided, and more green open spaces also, then clearly new developments need to provide that.

Proposal 6. Promote and celebrate walking.

We are not sure that this is necessary as most people who visit the City are surely aware of the geography and if they are not they can use smartphone apps to find their way around.

Proposal 7. Provide more public space.

This is a laudable objective, but we would object to "reallocating carriageway" to create new public spaces" or to provide more seating however much that may be required. Such changes have already damaged the road network in the City and more damage should not be caused.

Proposal 8. Incorporate more greenery into the City's streets.....

We support this proposal.

Proposal 9. Reduce rainwater run-off....

We support this proposal.

Proposal 10. Incorporate protection from adverse weather....

A worthy objective but the increased presence of tall buildings is certainly worsening wind speeds in many locations and should be a priority consideration for new developments and mitigation of existing developments.

Proposal 11. Take a proactive approach to reducing motor traffic.

We are strongly opposed to this proposal and as stated above we object to any "hierarchy" of preferences for transport modes. The amount of traffic on City streets is already quite low. Congestion is caused, which generates more air pollution, simply because inadequate road capacity is provided for the demand. Attempting to reduce motor traffic further will simply make the problem worse.

We object to the reallocation of road space to "provide more space for people walking, cycling and spending time on the City's streets" as being unjustifiable on any rational or cost/benefit basis.

Note also that we oppose the existing Congestion Charge scheme which is simply a tax on road users and has done absolutely nothing to reduce congestion. See this web page for our analyses of the Congestion Charge scheme: <https://www.freedomfordrivers.org/congestion.htm> . It might certainly be possible to devise a more rational scheme but we are not convinced that this would have any benefit in reducing congestion and we object to increased taxes on vehicle owners.

We object to using "parking reductions and restrictions" to reduce vehicle use. Such measures typically impose great inconvenience and additional costs on those who need to use vehicles for various reasons.

We oppose the introduction of access restrictions and timed road closures which are very inconvenient for road users, particularly those unfamiliar with the road network. Bank junction closure is a typical bad example which is simply being used to generate income from fines for the City Corporation when a proper redesign of that junction to meet the needs of improved road safety and more space for pedestrians was required.

Proposal 12. Design and manage the street network.....

Having a clear street hierarchy to ensure there is a co-ordinated and rational road network is sensible. However when such proposals include full or partial street closures, or turning streets into "places" rather than their main purpose of supporting traffic movements, we are opposed.

Proposal 13. Use timed and temporary street closures.....

We are strongly opposed to such proposals because they create enormous difficulties for road users. For example, in simply knowing about such restrictions which is very evident from the Bank scheme.

Proposal 14. Making the best and most efficient use of kerbside and car parks.

Some of the proposals therein might make some sense in some locations. But for example it says "identify spare capacity in City Corporation car parks..." when to our knowledge there is little such spare capacity and at certain times of the day during peak months they are totally full.

Proposal 15. Support and Champion the "Turning the Corner" campaign.

Changes to the national Highway Code are really not a matter for the City of London Corporation to comment upon as there are much broader issues to consider here. We doubt that any such change to the Highway Code would have any significant impact on road safety in the City.

Proposal 16. Develop and Apply the City of London Street Accessibility Standard.

No mention is made of taking account of the needs of vehicle users in street design so we object to this proposal.

Proposal 17. Keep pavements free of obstructions.

We support this proposal.

Proposal 18. Keep pedestrian crossings clear of vehicles.

We oppose any proposal to introduce a new offence in relation to this alleged problem. We doubt there is any significant problem in reality and the main offenders are probably buses who sometimes have little alternative. We doubt it is a major problem for pedestrians even then.

Proposal 19. Support accessibility improvements.

We support this proposal.

Proposal 20. Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero.

Redesigning streets to improve road safety is a sensible objective, and concentrating on those locations with a known poor accident record is also sensible.

But we are strongly opposed to reducing speed limits to 15 mph. Reducing the speed limit will not likely have any significant impact on road casualties. The 20-mph speed limit imposed on the City in 2016 has not done so despite active police enforcement, so why should a 15-mph limit have any impact? Compliance will be poor and if complied with will impose very high economic costs that have not been quantified. Yet another example of no cost/benefit analysis by the City Corporation. Even just imposing this speed on buses will deter bus usage which is already falling due to low bus speeds.

The suggested “theoretical” savings in collisions and personal injuries, from such a reduced limit is just that – purely theoretical and not likely to be achieved in practice. The recent DfT report on signed-only 20-mph speed limit schemes showed exactly how such alleged claims are not met in reality. The City Corporation seems to want to ignore real evidence on road safety measures in favour of token gestures.

Proposal 21.

Proposal 22.

Proposal 23.

We support the above proposals.

Proposal 24. Apply a minimum cycling level of service to all streets.

We oppose the suggestion that motor traffic volumes are forced below certain levels or that priority is given to people cycling over motor vehicles. Different transport mode users have to share the streets and there should be no hierarchy of transport mode provision.

We are concerned about the dangers to pedestrians from cargo cycles and electric cycles that may travel faster than is acceptable, or otherwise create a danger to pedestrians. For example, a pedestrian hit by a cargo bike is very likely to be injured. The dangers to pedestrians from cyclists was mentioned by many in your consultations and workshops but seems to have been ignored and this problem is likely to get worse. It seems very unlikely that cyclists will adhere to the proposed 15-mph speed limit.

Proposal 25.

Proposal 26.

Proposal 27.

Proposal 28.

We can see little justification for major expenditure to support cycling. Cycling is only available to a small proportion of City workers – those who are young and healthy and live within short distances of the City centre. Encouraging cycling also creates increased road safety problems as it is known to be a relatively dangerous mode of transport.

Proposal 29. Support and Champion a central London Zero Emission Zone.

We are absolutely opposed to this on the grounds that it is unnecessary, will not have the desired effect, will impose enormous costs on vehicle users and cannot be justified by the current or projected future air pollution conditions. Although there are some particular air pollution hot spots in the City – for example on Upper/Lower Thames Street and Bishopsgate, these problems are mainly caused by diesel buses and HGVs. There are no practical zero emission vehicles for the latter and buses are mainly under the control of TfL and are rapidly moving to be zero emission or hybrid types (see Proposal 31).

In reality there is no major public health crisis due to vehicle emissions as claimed by the Mayor of London and in your Transport Strategy document. The real facts on the subject are covered in a paper which we published here: <https://www.freedomfordrivers.org/Air-Quality-and-Vehicles-The-Truth.pdf>

Even the claims about the dangers from NO2 pollution are grossly exaggerated. The latest COMEAP report indicated that the Committee could not even decide whether there was any clear danger to health from NO2.

As regards proposals to introduce a local ZEZ in the Barbican area, how many Barbican residents with vehicles actually have zero emission vehicles at present, or will wish to buy new vehicles by 2022? We suggest they be asked. But we believe that many will not wish to spend money on a pointless and fruitless exercise because emissions in local areas mainly blow in from outside so any localised action will have a very limited impact.

These proposals are simply irrational and no cost/benefit justification is provided.

Proposal 30. Install additional electric vehicle charging infrastructure.

No objections.

Proposal 31. Request an accelerated roll-out of zero emission capable buses.

We support this proposal.

Proposal 32.

Proposal 33.

We support these proposals.

Proposal 34. Reduce the level of noise from motor vehicles.

This may be a worthy objective but is it a problem in reality? Who has complained about it?

Proposal 35.

Proposal 36.

Proposal 37.

No objections to these proposals.

Proposal 38. Reduce the number of freight vehicles in the Square Mile.

A laudable objective but is this a realistic and practical objective given the expansion in numbers of City workers? We doubt it. The proposed ways in which this might be achieved all seem expensive in terms of the costs they will impose on freight vehicle owners. Again there is no cost/benefit analysis provided to justify these proposals.

Proposal 39.

No comment.

Proposal 40. Allow Local Access streets to function as City Access streets.

The concept of restricting some streets from access but varying that restriction is deeply flawed. Vehicle users have great difficulty in knowing about such changes, and clearly the use of signage is inadequate to properly inform drivers – see Bank Junction as an example of how such arrangements fail to work.

Proposal 41. Reduce the impact of construction and street works.

We support this proposal.

Proposal 42. Make the street network resilient to severe weather events.

No comment, but as it does not appear to be a major issue at present, we suggest no great money be spent on this issue.

Proposal 43.

Proposal 44.

Proposal 45.

Although we have no specific objections, the above proposals look like a bid to create a lot of extra bureaucracy with very significant costs. Justification should be provided for such activities.

Proposal 46. Support better connections.....

Note that our members are not unanimous in support of expansion of Heathrow Airport due to air pollution and traffic congestion issues, and in general oppose HS2 on the grounds that it is financially a quite unjustifiable project. We do not believe the City Corporation should take a position on either issue.

Otherwise we support the proposals.

Proposal 47.

Proposal 48.

We support these proposals.

Proposal 49. Review bus provision.

We have no objection to a review of bus provision but note that in general we oppose “bus priority” measures where they impede other vehicles (e.g. bus lanes).

Proposal 50. Support the Mayor of London in retaining locally generated taxation.

We oppose this proposal. The Mayor of London is building a financial empire based on greatly increased taxation on vehicles for which there is no financial justification. The City Corporation should not be supporting the Mayor's policies such as retaining VED.

Proposal 51. Encourage continued Government investment in major London transport projects.

We would only support those where there is a clear cost/benefit justification. Crossrail 1 (the Elizabeth Line) is, as usual with major projects, turning out to be a lot more expensive than anticipated and it was not financially justified even when originally proposed. Crossrail 2 is likely to be another unjustifiable grandiose "vanity" project with very few benefits. Such projects should only be proposed when the likely users of the transport facilities provided will pay the cost of both building and running them over a period of 15 years or less, i.e. there should be a positive return on the capital invested.

Lack of Positive Proposals. One noteworthy aspect of the draft Transport Strategy is the failure to plan for an improved road transport network, i.e. to provide for increased capacity to cope with the recent past increases and projected future increases in population growth and business activity. As there are many services which cannot be provided other than by road transport, it seems irrational not to propose improvements in the road network where they can be accomplished. In reality exactly the opposite has happened in the last twenty years – changes at Aldgate are a good example of the degradation of the road network but there are many others.

Conclusion. In summary, many of the proposals contained in the Draft Transport Strategy are misconceived, not based on real evidence, will impose major costs on vehicle users, and are unjustified. The lack of any cost/benefit justifications and the lack of consideration of the views of road users in this document is symptomatic of a deep bias against road transport of all kinds.

It is very disappointing that a more rational and balanced approach to improving transport in the City of London has not been taken.

Yours sincerely

Roger Lawson
Campaign Director