



# The Alliance of British Drivers

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Greater London Assembly  
Transport Committee

Via email: [scrutiny@london.gov.uk](mailto:scrutiny@london.gov.uk) (attention Richard Berry)

13 September 2016

## Submission of Evidence to the Scrutiny on Traffic Congestion

Dear Mr Berry,

Below is a submission of evidence to the current scrutiny on traffic congestion in London. The Alliance of British Drivers (ABD) is a national organisation that represents the interests of motorists. I represent the interests of members in the London area and have very extensive experience over many years of traffic issues in London.

The information given below responds to the questions posed by the Committee.

### **1. How has traffic congestion changed in London in recent years?**

It is undoubtedly the case that traffic congestion has been getting worse in the last few years. Of course historically London has been congested since the era of the horse and cart, and it tends to be self regulating - if it gets too bad then people stop travelling, use other means of transport or use alternative routes.

You give some figures in your note to the Committee on recent changes which in brief are:

*- A reduction in traffic speed. On London's A-roads, average speed fell from 16.3mph in July 2013 to 14.8mph in July 2015.*

*- Excess waiting times for buses have increased from an average of one minute in 2013/14 to 1.2 minutes in 2015/16*

*- Journey time reliability on the TfL Road Network (major roads) has fallen from 89 per cent in 2013/14 to 87 per cent in 2015/16.*

Likewise TomTom reported earlier this year that congestion in London was 14% worse than five years ago (even though traffic congestion in the rest of Europe over that period was 3% down) and that the "added delay" over free flowing traffic conditions rose by 37% in 2014 alone!

## **2. What are the key causes of these changes in congestion?**

There are a number of factors that are likely to have affected the level of congestion. These are:

a - Demand on road space driven by a larger number of vehicles which is partly driven by the increase in the population and economy of London (which of course have been growing rapidly due to previous mayoral policies). But it is also driven by the changes in the economy which affect vehicle types. So for example while private car usage has probably declined there have been large increases in private hire vehicles (PHVs) from services such as Uber, and also increases in light vans as the internet economy drives an increase in the need for delivery services.

Indeed trends in traffic and road usage are documented in the recently report published by TfL entitled "Travel in London - Report 8" - see <http://content.tfl.gov.uk/travel-in-london-report-8.pdf> .

For example in the period 2008-14, it reports *"In terms of travel by road, the absolute number of car trips has reduced by 1.0 per cent, compared to MTS [Mayors Transport Strategy] expectation of a 1.3 per cent increase, reflecting the strong shift in net mode share away from car travel in London."*

It is clear that the growth in population and business activity and the travel demand they generate has been mainly absorbed by increased public transport provision and usage plus to a limited extent more cycling and walking (which have been encouraged by rapidly rising public transport fares).

b - But as the aforementioned report says *"This reduction [in road travel] has, to some extent, facilitated the removal of available road network capacity for general traffic to pursue other priorities such as improved safety without, until the most recent year, adverse consequences for road network journey times and delays."*

We certainly believe that a lot of the causes of additional congestion in recent years have been caused by removal of road space and that includes the space taken up by Cycle Superhighways, cycle lanes, more pedestrian space which has removed road lanes, and reconfiguration of junctions.

The removal of some of the gyratory systems has been a major problem and although some changes might have been justified in the name of road safety and environmental improvements, the resulting outcome has often been very damaging. For example Trafalgar Square was an example of how a major road hub was damaged, and more recent examples are the Aldgate gyratory, Archway and of course the latest proposals for Bank junction in the City.

We believe a lot of the changes to the road network have been driven by dogma rather than sound cost/benefit analysis. A simple example was the unnecessary closure of Shorter Street in the City other than to buses/cyclists as part of the Cycle Superhighway works which has caused traffic diversion, extra loads on already congested routes and about which we have been making representations. There are many other examples of unjustified road closures in the last ten years.

### **3. What impact does congestion have on Londoners, the city's economy and the environment?**

You have already answered some of these questions. There are direct costs in terms of the wasted time of road users and environmental costs in that congestion tends to create more air pollution (although the evaluation of that in monetary terms is difficult and the impacts on health are also difficult to estimate - but Londoners are in general seriously concerned about the level of air pollution).

High congestion also deters businesses from locating within London, deters tourists from visiting and makes London look an unattractive city to the world in which to do business or travel.

### **4. What can London learn from other cities in its effort to reduce congestion?**

Not a lot in essence. London has implemented many of the initiatives used to tackle congestion such as bus priority, encouraging cycling, car and cycle hire schemes, road pricing, traffic light control, etc. But a lot of these techniques are ultimately ineffective.

Looking at other cities, it would appear that those less addicted to grandiose schemes but more to careful design of road networks (and reluctance to make changes unless there are clear cost/benefit advantages) are the most successful.

### **5. How effective is the Congestion Charge? How should the scheme be modified?**

The Congestion Charge has been totally ineffective in reducing or controlling congestion. Indeed TfL have just decided to rename it a "Road User Charge" no doubt for that reason, although it really should be called a tax.

We looked at the impact of the Congestion Charge soon after it was introduced and published several notes based on subsequent reports published by TfL (they gave up doing so some years later). There are some notes that we published on our web site here: <http://www.freedomfordrivers.org/Congestion.htm>

There has been no congestion reduction from the congestion charge. Why is that? Probably because the demand for road space was so great that if you charge for it, those who are unwilling or cannot afford to pay the charge are simply replaced by those who can. In other words, it just introduces social discrimination in the use of the road space with the rich taking up space vacated by the poor.

In addition it has had no benefit in reducing air pollution.

It was also a poorly designed scheme, and very expensive to operate (most of the "tax collected" is wasted on administering the scheme). We suggest it should be scrapped rather than modified.

## **6. To what extent would a usage-based road pricing regime help reduce congestion?**

It would not reduce congestion at all in our view. The ABD is consistently and vehemently opposed to road pricing and the general public have also demonstrated majority opposition.

## **7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?**

It seems very unlikely to us that these schemes will have any impact on congestion for the same reason that the Congestion Charge has failed. Namely that the demand for road space is so high that people will pay whatever is required, or others willing to pay or adopt other vehicles will get the benefit.

## **8. What would be the benefits and drawbacks of these other interventions: Tolling of river crossings, workplace parking levy, devolving vehicle excise duty to London?**

In general we are opposed to tolls on river crossings, even when they are claimed to be used to finance new such developments. They are effectively a tax on travel. We can see no benefit in terms of traffic congestion reduction for the reasons give above.

A workplace parking levy is unlikely to have a significant impact as few commuters in London drive. Again it is likely just to be another tax that people are willing to pay because they have no alternative.

A devolved vehicle excise duty might be attractive to raise funds for TfL but it is unclear to us as to why London should be expected to have a different arrangement to any other city in the UK. In any case, a lot of the drivers within London come from outside the GLA area. Or to look at it another way, why should London registered drivers not fund roads in the country as a whole because they are likely to be driving outside London? Such suggestions just smack of desperation to us for more sources of funding for TfL when they are already highly funded but in essence inefficient in the use of their funds (as the current Mayor repeatedly said in his election campaign). Unfortunately the expenditure of money on schemes such as the Cycle Superhighways, 20 mph zones, Quietways, Cycle Hire, Trams, Emirates Cable Car, massive bus subsidies (by far the highest in the UK and even in the world) , the Freedom Pass and numerous other expensive schemes with few justified benefits has resulted in this expensive cost structure.

Proposals from the Mayor or TfL for road pricing or emission zone charging schemes seem to be motivated more by the needs to raise tax rather than anything else. It is money that is driving these proposals, not benefits to the road users or the general population as the cost/benefits of such schemes are rarely justified.

Indeed the traditional way to justify road schemes using a proper cost/benefit analysis has been thrown out of the window and public consultations are now done on such proposals without such an analysis being provided until very late in the day, if at all. This results in perverse outcomes as we have seen with the Cycle Superhighways.

**10. To what extent is an increase in minicabs contributing to traffic congestion, and how should this issue be addressed?**

It does appear that the increase in PHVs may be contributing to congestion but it is difficult to separate out that impact from other changes that have contributed to congestion. We suggest there would need to be more specific evidence on this before any steps were taken to address the issue.

**11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage them?**

Car clubs have been around a long time now, with only limited take up. Increased numbers of car clubs might actually mean more vehicles on the road as they might be more actively used than privately owned vehicles. At best they might reduce parking demand but it is difficult to see how they would reduce congestion.

**12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?**

Buses can actually contribute to congestion as they are slow moving and stop more frequently. Indeed on some roads congestion and air pollution might be substantially reduced if there were fewer buses (Oxford Street is of course an extreme example). Where bus lanes are introduced to help the speed of bus journeys, they negatively contribute to congestion faced by other vehicles. 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.

**13. How can TfL further encourage a shift from private car use to public transport or active travel modes?**

We see no need for such encouragement. Certainly the recent increase in congestion has not been caused by an increase in private car use (except perhaps to some extent in PHVs - but users of PHVs are unlikely to switch to public transport or cycling/walking). It would seem more rational to tackle congestion and its causes by other means.

**14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?**

Certainly new roads and increased road space would assist and should be considered. There need to be major improvements to both arterial routes and circular routes - for example the "Inner Ring Road" which is the boundary of the congestion charge zone but is a major route only in name (few improvements made to it), the North/South Circular where the South Circular in particular has minimal capacity over most of its length with little improvements made over many years,

and arterial roads on the west and south of London. There are also lots of minor junctions schemes that would assist with congestion.

**15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?**

The reason for the existing congestion is because there is already high demand for the available road space and people willing to consume it even though they suffer delays. More road space may not affect those consumers, but it might encourage others to do so. However, as the usage of private vehicles (other than PHVs) seems to have stabilized in London, and vehicle ownership likewise reached a natural maximum in many boroughs, it seems unlikely to us that overall demand for road space would increase substantially.

**16. How should new road infrastructure be funded?**

We believe road infrastructure should primarily be funded out of national taxes, as at present. Road users actually pay a lot more in taxes (fuel duty, road tax, VAT, etc) than is spent on the road network. There is little justification for imposing additional taxes in a local area, even to fund specific schemes (and we include "charging" schemes in that).

**17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?**

They seem to be effective if complex to administer. We have not seen any reports on the cost versus effectiveness of these measures.

**18. How can the use of technology be enhanced to help TfL manage congestion? For example, how can the iBus system be used for this purpose?**

The iBus system tracks buses. It could presumably provide congestion information. However that is readily available from other sources available to TfL and from commercial providers of satnav products for car/van users.

It is of course not easy to divert buses to alternative routes at short notice without considerable inconvenience to passengers.

**19. How effective has the Road and Transport Enforcement team been in tackling congestion?**

One gets the impression that management of the network has improved over the past few years with TfL having more access to video cameras and traffic flow data. This has enabled them to identify problems more rapidly but whether any more benefits could be obtained by assigning more staff to response teams to deal with known problems is difficult to say.

A lot of the congestion is caused simply by too many vehicles for the available road capacity at particular times or on particular dates (particularly when there are special events or road closures taking place), so dealing with "hot spots" can often only deal with short term and minor difficulties.

## Conclusion

In conclusion let me repeat what we said in response to the Roads Task Force Consultation in 2012 as the comments are still very much to the point:

*"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."*

Note that we really do need to look at the proper development and protection of a strategic road network in London if we are to reduce congestion. At present the network gets repeatedly damaged by proposals put forward on grounds that are claimed to be of public benefit but which in practice have negative cost/benefits.

Part of the problem is the lack of expenditure by TfL on road improvement schemes, when they have funded many other projects some of which have contributed negatively to traffic congestion.

I would welcome the opportunity to speak to the Committee on this topic.

Yours sincerely

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