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THE BROMLEY BOROUGH ROADS ACTION GROUP

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3 July, 2006

Response on Stakeholder Consultation – Draft Local Implementation Plan Transport

Dear Ms Bartholomew,

Our comments on this document are as follows:

Introduction Page 1. In the fourth paragraph it refers to “car dependency”. We have repeatedly objected to the use of this phrase in council documents. There is no justification for using the term “dependency” to refer to people’s logical decisions to use one mode of transport rather than another. We request that this be rephrased as “car usage”.

Chapter 2 Page 1. Likewise there is mention of “car dependency” which should also be changed. It also refers to “increasing social exclusion amongst those without car access or unable to use public transport” as one of the “main transport pressures”. I simply do not understand that. Are you saying that people who are apparently totally immobile (other than the fact that they can presumably cycle or walk) are subject to more “social exclusion” than in the recent past? What evidence is there for that, and how is it relevant to the pressures on transport?

Are you simply saying that there are fewer public facilities within easy walking distance of where people live (in which case you could say so), or something else?

Chapter 5 Page 89 – Congestion Bottlenecks. There are of course a number of other “pinch points” in the borough which could be tackled. For example, the problems caused by the introduction of a short right filter lane at the junction of Perry Street (the A222) and Ashfield Lane in Chislehurst. We have complained about this several times in the past as it causes unnecessary traffic queues, without any effect to date.

Chapter 5 Page 111 – Pedestrian Phases at traffic signals

It is noted that one of the “High Priority” locations is the junction of Bromley Road/Bromley Lane/Royal Parade/Centre Common Road. It seems that from the comment on the following page, that action has been delayed here due to “issues relating to the acquisition of common land”, although I do not understand quite why. However, from a frequent user of that junction both as a pedestrian and car user, I have the following comments:

A – I have not experienced any great problems in crossing that junction as a pedestrian.

B- Bearing in mind that this junction is already severely congested with traffic, adding an additional delay for a pedestrian phase who simply exacerbate matters.

Therefore we would not be in favour of changing that junction unless the road can be widened to provide more traffic capacity at the junction, or unless there is clearly a substantial road safety problem in respect of pedestrians (and I don’t think the current statistics would demonstrate that at present).

Chapter 6 Page 13 – Para 6.37. Well the “use of safety cameras, humps, etc” have been fully explained to skeptical Bromley road users such as myself, and having studied the evidence I don’t think the benefits obtained justify the other disbenefits. So I am glad to see that you propose to concentrate on other methods of accident reduction. But it would have been wiser not to suggest that Bromley residents are simply “uneducated” – Bromley residents are probably more educated than those in most London boroughs, not just in terms of general educational attainment levels, but in respect of transport issues due to my own organizations activities.

Chapter 6 Page 14 – Para 6.39 Seat Belts. Clearly it is very important to promote the use of seat belts and we would encourage that to be done via suitable education programmes. We would like to see more specific commitments in that regard.

Chapter 7 Page 26 – Para 7.121 CCTV Enforcement. The increasing use of CCTV cameras to enforce bus lanes and parking appears to be motivated by a desire to raise revenue, rather than by excessive infringement. In the recent case of the Cray Avenue Bus Lane, the use of cameras (now 3 in number) seems to be only “catching” offenders who have accidentally entered the bus lane, or who are turning left and trying not to impede other traffic. There is no evidence that buses are being impeded. Therefore we suggest that the policy be changed so that CCTV enforcement is only introduced where persistent infringement is obstructing buses and where alternative measures have been tried without success; and infringers are only prosecuted where they are either persistent or clearly not accidental.

Chapter 7 Page 39 – Item 14 CPZs. It would appear that proposals for new CPZs in Beckenham, Petts Wood, etc, are being considered. We have consistently opposed the introduction of more CPZs and as residents now often vote against them when asked, why are more being considered? It appears from the responses you obtained from the previous consultation on the LIP, that many residents feel the same way.

Chapter 8 Page 4 – Para 8.15 School Travel Plans. The report seems to suggest that STPs will assist in “modal shift”, but there are no apparent targets for reducing the volume of cars involved in the “school run”. Without firm objectives, we are doubtful that clear success or failure will be achieved, and we may be spending a lot of money on these projects without significant return (other than possibly improved safety).

Chapter 8 Page 4 – Para 8.16 School Buses. We support the introduction of school buses. Note that in Para 8.18 it refers to a study of those in Appendix XIII, but I could not find that appendix – is it available?

Chapter 10 Consultation - General. Although we agree with many of the comments you obviously received from other “stakeholders” and members of the public, it would appear from para 10.90 that you did not take account of, nor even possibly received, the written comments that my organization previously submitted. We would like those included in summary form in the same way you have for other organizations and I enclose a copy of our original submission.

I have raised the apparent failure to take into account our comments with Iain Forbes and he has assured me that our views were incorporated into the RBA comments, but it seems odd that two organizations comments are given explicitly and the authors named, when ours are not. There should at least be consistency on this in the final version of the LIP.

Chapter 10 Page 3 Parking. Here and elsewhere the high and increasing costs of parking are mentioned by consultation respondents. In addition it seems that most of the surplus on parking is being redirected into funding for the Freedom Pass. We believe that any surplus from parking should be used to fund programmes that directly help the motorists that pay these charges, and not be diverted to public transport programmes. If Mr Livingstone wishes to provide free transport to people like me who don't need the subsidy, then the financial cost should weigh on all of the electorate who have supported him and his policies, and not on a minority.

Chapter 10 Page 17. We particularly note the comment by the Orpington District Travellers Association regarding the need for more parking provision at rail stations, but there seems to be nothing in the proposed plans to assist in that regard.

General Comments. As we said in our previous consultation response, the most glaring omission from the LIP is the failure to suggest any improvements in the road network such that road journey times and congestion could be significantly reduced. The current draft LIP is no better in that regard.

Our other previous comments on the provision of parking, expenditure of surpluses on parking revenue, cycling, obstruction of rights of way, the "school run" and "modal shift" are also worth re-reading and are still applicable.

Little seems to have been done to adapt the LIP to meet our comments or those of other stakeholders and residents, and it seems to have been written simply to fit in with the ideas of TfL and the Mayor of London, whose recipes for transport development are not very applicable to Bromley and are contrary to the wishes of residents.

Yours sincerely

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