



# B.B.R.A.G.

## THE BROMLEY BOROUGH ROADS ACTION GROUP

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### London Borough of Bromley Transport Local Implementation Plan (LIP) Consultation

Dear Ms Barnes,

Regarding the above mentioned consultation, we have the following comments on behalf of our members. Note that my organization campaigns for improved transport systems in the borough and more background information on us can be seen on our web site at [www.bromleytransport.org.uk](http://www.bromleytransport.org.uk). I have organized our comments in the same format as your suggested response form.

#### **Chapter 0 (Introduction) Point 0.5**

Unfortunately the Mayor's Transport Strategy may be something that the LIP has to conform to, but it also contains unrealistic targets such as increasing cycling by 80%. We did tell the Mayor so, but as usual he and TfL take little notice of public consultation. More on this later when we comment on detail sections.

I would also like to point out that as usual with such documents (both the LIP and the Mayor's Transport Strategy), it is often more what is left out than what is put in that is of the greatest importance and impact. Neither document addresses how the road transport network in the borough might be improved, such that road journey times and congestion could be significantly reduced. In our view, the LIP is very defective in this regard and this point is of major significance.

## **Chapter 1 (Local Socio-Economic/Demographic Context) Point 1.16**

What is not made clear here is that the trend for employment is for high paid workers to commute elsewhere (eg. into the City of London), leaving only low paid employment in the borough (typically in retailers or local services). This is a direct consequence of past transport policies in the borough and the new policies of the Mayor. The road network has been degraded, and parking provision artificially restricted so that businesses have moved out, and are moving out, of the borough. Where there are businesses such as those requiring professionally qualified staff, they need to attract such staff from a wide area, and these people are most likely to commute by road. This is particularly so in Bromley where there is a poor public transport system.

This is demonstrated for example in Orpington where parking adjacent to high quality offices is being destroyed and replaced by a totally inadequate new structure, almost certainly leading to some of the businesses occupying those premises moving away in due course.

We believe such policies should be reversed so that Bromley has a much more vibrant and varied local economy, and does not simply become a dormitory town for City commuters.

## **Chapter 2 (Local Transport Context) Point 2.1.3**

As this paragraph states, fewer than one in three residents work in the borough, and there is heavy dependence on central London and other “business centres”. Unfortunately the Mayor’s plans will result in a continuation of this trend (ie. centralization instead of decentralization and local employment opportunities) when his plans contain very little to improve the transport network, and in a realistic time frame. The suggestion that buses and trams might solve these problems is unrealistic in the extreme. At present it is very difficult to commute long distances by bus and tram because they are too slow and the former are certain to be unattractive to professional workers.

## **Chapter 2 (Local Transport Context) Points 2.3.2 to 2.4.2**

Well it’s good to see that the real experience and feelings of the local public in Bromley are spelled out here. But the discussion tends to assume that peoples views may be mistaken (eg., non public transport users on public transport quality), or that they are easy to change. Not necessarily a realistic assessment of the situation. For example, 2.4.2 suggests that one of the core objectives should be “Aiming for a behavioural change in travel habits”. Nobody has yet demonstrated that behaviour

can be changed in this way, and excessive expenditure on such programmes is in our view a waste of money. People's choices of travel patterns are dictated by convenience, cost, journey times and comfort, and trying to "educate" them to use other modes may be totally unsuccessful.

#### **Chapter 5 (Issues Paper 1 Accessing the Countryside) Point 5.1.6.1**

As regards the last question posed, there is certainly a need in Bromley to establish sufficient resources to monitor and improve rights of way, both for vehicular traffic and pedestrians. For example, I have found it personally necessary to complain about obstruction of rights of way in Chislehurst twice (in respect of Camden Park Road and Kemnal Road) where gates have been constructed by local residents.

#### **Chapter 5 (Issues Paper 2 Cycling) Points 5.2.2.4, 5.2.5.2, 5.2.5.3, 5.2.6.1**

Clearly the target to increase cycling in Bromley by 80% is unrealistic. Cycling in Bromley has been falling, and is unlikely to rise, for two very good reasons:

- a - Bromley is a relatively hilly borough and the extended distances between borough centres mitigate against cycling.
- b - Some of Bromley's roads are narrow lanes on which cyclists feel unsafe due to passing cars, lorries and buses (the proliferation of wide pedestrian refuges and road narrowing has actually worsened this situation in many cases).

Past expenditure in Bromley on such items as cycle lanes on roads has generally been wasted and has not resulted in a significant increase in cycling or much obvious benefit in road safety terms (and such cycle lanes are not even seen as being of much benefit by many cyclists). We would like to see less expenditure on such "on-road" cycle lanes, and less expenditure generally on promoting cycling (which like much "behavioural change" expenditure is ineffective). However, we think that where it is possible to provide off-road cycle paths (eg. on green verges or by sharing of existing footpaths), then that expenditure may be worthwhile.

#### **Chapter 5 (Issues Paper 3 Infrastructure ) Point 5.3.6.1**

The amount spent on infrastructure maintenance seems about right at present, and the transport network seems to be in reasonable condition. However, there appears to be a potentially growing problem in that many road "improvements" now involve measures that require very high maintenance, e.g. painted road markings and speed humps.

### **Chapter 5 (Issues Paper 4 Parking ) Point 5.4.2.2**

The statement of Policy 4G.6 and Proposal 4G.16 regarding limitation of off-street parking and pricing is not actually a complete statement of the original items where the adjunct “in line with the objectives of the Transport Strategy” were added. As one of the objectives of the Transport Strategy is to reduce congestion, this can actually be interpreted in more than one way.

It would certainly be inappropriate in the London Borough of Bromley to artificially restrict such off-street parking provision. It might simply have three negative consequences: more on-street parking, more congestion as drivers circulate looking for a parking space and migration of businesses and shoppers out of the borough.

BBRAG is absolutely opposed to the idea that removing car parking provision will have any beneficial impact on traffic congestion, and we are opposed to any reduction in off street car parking provision. In practice we believe that off-street car parking provision should be increased in town centres and near stations so as to remove the pressure on local streets, encourage people to use rail transport, and remove the need for more CPZs.

### **Chapter 5 (Issues Paper 4 Parking ) Point 5.4.3.5**

We are definitely opposed to the introduction of more CPZs or Permit Parking schemes in the borough. These do not solve any parking problems, create problems for existing users of the parking spaces, and result in unnecessary charges for residents. If parking by commuters is causing problems for local residents, then the council should provide or encourage the provision of off-street parking.

### **Chapter 5 (Issues Paper 4 Parking ) Point 5.4.5.1**

Answers to questions are:

1. Yes
2. Park and Ride schemes provide additional facilities and therefore we support them as a possible help to traffic congestion reduction, but they are not a “viable alternative” in the sense that they necessarily enable removal of town centre parking facilities. At least they wouldn’t be unless they were so successful that it later proved to be that there was surplus capacity developing in the town centre.
3. Yes
4. Maybe, but probably not.
5. Too rigid.

6. Parking charges are excessive, and have been going up much faster than inflation. More attention should be paid to reducing charges, reducing enforcement costs, reducing the need for enforcement by relaxing parking restrictions (including scrapping CPZs), etc.
7. What are the negative impacts of parking? In any case there are legal restrictions on diverting parking revenue to other programmes (I hope the council is sticking to the rules at present!).
8. Yes. We should scrap a lot of funding of public transport schemes (eg. much of the SELTRANS programme), bus lane, cycle lane, and “behavioural change” programmes, and spend it on better parking provision in town centres and around stations.
9. See above.

### **Chapter 5 (Issues Paper 5 Public Transport ) Point 5.5.6.1**

Answers are:

1. It's slow, uncomfortable, unsafe and is rarely convenient.
2. All of the above.
3. No.
4. N/A
5. Yes - it does too much and wastes money.
6. Nothing
7. Provide more long distance links from the borough to central London and around London, e.g. main line rail, underground, light rail links.
8. Don't understand the question.
9. Less
10. No.
11. Bus lane introduction and “bus route improvement” programmes should be reduced as the expenditure hardly justifies the benefits. Station access programmes are also often of questionable benefit (for example, the changes to Bromley South station which although justifiable on safety grounds has resulted in a significantly inconvenient arrangement for many travelers).

### **Chapter 5 (Issues Paper 6 Road Safety ) Point 5.6.6.1**

Answers are:

1. In general yes, although we believe there is excessive emphasis on speed as the primary cause of road accidents, which is simply not true.
2. In general yes.
3. More attention to and expenditure on road engineering works, and involvement in the planning process for new developments.

4. Stop introducing dogmatic policies which have little benefit in road safety terms.
5. ?
6. More resources could help, and less dependence on the funding and whims of TfL.
7. Yes. Repeat of above - ie. We should scrap a lot of funding of public transport schemes (eg. much of the SELTRANS programme), bus lane, cycle lane, and “behavioural change” programmes.

### **Chapter 5 (Issues Paper 7 School Travel ) Point 5.7.6.1**

Answers are:

1. Too much travel by car, and not enough by other means (walking, bus).
2. Yes.
3. Provision of buses.
4. There is actually very little evidence that children are particularly prone to accidents outside schools so I think the area should be relatively small.
5. It could do more.
6. Provide school buses. Encourage the police to stop obstructive, dangerous or illegal parking outside schools including such tactics by parents as parking on pavements. Get schools to stagger pupils hours. Provide individual pupil counseling on travel options. Campaign for changes to the law so that Bromley does not have to take pupils from anywhere else in London.
7. As above.
8. As above.
9. It is not clear that existing school travel programmes are having much impact so it is questionable whether more expenditure should be put into them.
10. As above.
11. N/A

### **Chapter 5 (Issues Paper 8 Town Centres ) Point 5.8.6.1**

Answers are:

1. A complex question which is also not very clear. But certainly access to town centres in Bromley is important if they are to retain their viability in comparison with other local centres such as Bluewater. Recent events in Orpington do not bode well in that regard.
2. No. All they do is interfere unnecessarily in individual choice, and their policies have little impact.
3. N/A as answered no to above.
4. It does too much already.
5. Nothing.

6. Nothing.
7. Yes, more public consultation should be undertaken on transport issues instead of policies being decided by people with vested interests in promoting their own personal agendas (eg. planning staff who are hardly representative of the general public and often have little experience of business and life in general).
8. Not sure as little information has been provided in terms of past or future planned expenditure on such programmes.
9. In general terms, yes. For example Bromley town centre could do with substantial improvement (and the amount committed to improvement of the Bromley High St South area is relatively small).
10. See above, for programmes that could be reduced.

### **Chapter 5 (Issues Paper 9 Traffic Reduction and Modal Shift ) Point 5.9.6.1**

Answers are:

1. Traffic growth is simply a natural consequence of the increase in affluence of the public and the superior transport technology that cars provide. The quality of life is only affected because insufficient has been done to cope with such increase.
2. No because decisions about improvements to the road transport network are not on the political agenda, there are no funds available for such improvements and the policies of Ken Livingstone and of central Government are against such expenditure. Capacity improvement is the only real solution and modal shift policies are tinkering at the edges with no real chance of having a substantial impact.
3. None.
4. Yes
5. See 2 above and 7 below.
6. See 2 above and 7 below..
7. Yes, more public consultation would make it clear what the public wants - namely more road capacity, junction improvements, congestion resolution by traffic engineering, etc.
8. Less
9. No.
10. N/A
- 11.

### **Chapter 5 (Issues Paper 10 Walking ) Point 5.10.8.1**

Answers are:

1. Invaluable

2. No
3. No
4. N/A
5. Yes
6. Nothing
7. Nothing
8. Don't know
9. Less or same.
10. No
11. N/A

### **Chapter 6 (Road Safety Plan ) Page 210 (page 22 of Plan)**

The comments made about “A representative of the London Ambulance Service...” are grossly misleading and should be removed. There were comments made by both the Chairman and Chief Executive of the LAS about the possible loss of life from speed humps (see [http://www.bromleytransport.org.uk/Ambulance\\_delays.htm](http://www.bromleytransport.org.uk/Ambulance_delays.htm) on our web site for the full story). Unfortunately it is true that some of these comments were exaggerated in the popular press and Mr Reinton never claimed that as many as 500 lives were definitely lost. In fact he subsequently indicated that he welcomed more research on this issue, but clearly believed that a substantial number might be lost. The subsequent “research” by TfL (and by TRL) simply tried to disprove something he did not say, and simply demonstrated that 500 seemed a rather unlikely number, but also demonstrated that the evidence was insufficient to come to any definite alternative conclusions. Bearing in mind that there is no evidence that speed humps have saved any lives in London at all (fatal accidents have not reduced in London as a whole in the period concerned), it is not unreasonable to conclude that more lives are lost from speed humps, and more pain and injury suffered as a result of speed humps, than are saved by them.

It is also incorrect to suggest in respect of the remarks of the Chairman or Chief Executive of the London Ambulance Service that “the statement has been withdrawn” - the previous statements were simply clarified to avoid incorrect press comment.

### **Chapter 6 (Parking and Enforcement Plan ) Page 210 (page 22 of Plan)**

As a final comment, and to reiterate the point made at the start, we believe that the Local Implementation Plan omits many things that would improve transport in Bromley. There is an over-emphasis on public transport schemes, particularly bus schemes, when the vast majority of journeys by the residents of Bromley are either by private car, or by Network Rail. There is no discussion at all in relation to improvement of the road transport network, on which the vast majority of trips in



Bromley depend. And the proposed plans in respect of parking are the same old dogmatic policies that have not proved effective in reducing congestion in the past, and simply create more inconvenience and time wasting for residents (or drive residents and businesses out of the borough).

Yours sincerely

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Chairman

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