



# BBRAG NEWS

Bromley Borough Roads Action Group - No. 48 (September 2007)

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## Editorial

*This newsletter is earlier than expected, and is a “bumper” edition with lots of stories. It seems that August is a popular month for announcing sensitive news such as the £25 London congestion charge and the abandonment of the West London Tram – you might care to wonder why.*

*This edition concentrates on road pricing and congestion charging stories. It also covers the real facts on air pollution and cars – a particularly useful analysis as road pricing and congestion taxes are now being promoted on the basis of their environmental benefits – which is a nonsense of course as there aren’t any.*

*I did have to mention “climate change” a couple of times but note that your editor has studiously avoided discussion of global warming, and the influence of CO2 emissions. These are matters that cannot be answered with any certainty and they are irrelevant to the issues now being faced.*

*My stance is that reducing air pollution in London, particularly of emissions other than CO2, would be generally beneficial and if that can be achieved at reasonable cost and in a reasonable manner then I have no objections. But I do object to proposals like the £25 London congestion tax, and CO2 based permit parking charges that will not have any impact whatsoever. They are pointless gestures and like many other proposals from local authorities of late, are really just a way of raising more revenue from motorists which will get squandered on employing more bureaucrats and on silly public transport programmes.*

*Roger Lawson, Editor*

## Cars and Air Pollution – The Facts



When Islington Council circulated a leaflet to all residents in their borough on the CO2 based permit parking proposals, the council Leader, James Kempton (picture left) said in it that “Carbon dioxide emissions impact on

climate change and one of the contributors to rising emission levels is cars.” Although your editor personally told Mr Kempton that he was wrong at least on the latter point when he met him at a meeting in Islington, I did not have the proof immediately to hand. But it is given in an interesting document recently published by Transport for London (TfL).

This document is the TfL "Environment Report 2006" which can be found on the internet at: <http://www.tfl.gov.uk/assets/downloads/corporate/Environment-Report-2006.pdf>

Although the introduction by Peter Hendy, Transport Commissioner, repeats the spurious claim that air pollution has reduced as a result of Congestion Charging (see our last edition), it contains some other useful information. For example, it notes on page 7 that CO2 emissions from TfL's own offices increased by 2 per cent over the previous year, and by 11 per cent per square metre of floor space. So much for TfL setting a good example to the rest of us. One wonders what caused the increase. Is it because they bought a lot more IT equipment, turned up the air conditioning, or what?

Page 31 contains the really important data though. It provides estimates of the CO2 emissions from different transport modes, in 2005/2006, including a "per passenger" figure.

### ***Air Pollution from Cars Not Increasing***

The figure for total CO2 emissions of cars is given as 4.73 million tonnes. Even though it does not show the change from the prior year, in the previous years report, page 7, it gives estimates of total CO2 emissions in 1999, and that shows a total of 4.67 million tonnes for cars – in effect no significant change over 7 years, and it probably fell last year.

### ***But Pollution from Buses Increasing***

The latest report shows total emissions from buses actually rose by 5%, including an incredible figure of 7% increase for CO2 emissions per passenger over the year.

### ***And Buses are Barely Better than Cars***

The other revealing figure in the table is that it shows that the average CO2 emissions per passenger for buses is 103 gms/km in London, whereas for cars it is 124 gms/km. In other words, there is not much difference.

That is probably based on the average occupancy of cars of not much better than one. So if there are two of you in a car, you are almost certainly "greener" than going by bus.

The figures for underground and tram travel are better, although it does not make it clear whether that data includes their total emission costs, including those from the power stations needed to generate the electricity to drive them.

Of course all of these figures are based on TfL estimates and they provide few details of how they arrived at these figures. Knowing the preference by TfL for public transport over private vehicles, one has to bear in mind that the estimates may also be biased in various ways.

### ***SMMT Figures Also Say CO2 is Falling***

Cleaner new cars have saved five million tonnes of CO2 in last decade 25/06/2007 according to a recent report by the Society of Motor Manufacturers and Traders (SMMT).

SMMT economists have calculated that car makers saved nearly five million tonnes of CO2 in the last ten years - thanks to the development of cleaner, greener cars. Average new car CO2 has fallen by 22.6 g/km to 167.2 g/km since 1997, down by nearly 12 per cent. That equates to current annual CO2 emissions savings approaching a million tonnes.

"Car makers have made significant progress in cutting CO2" commented SMMT chief executive Christopher Macgowan. "Total CO2 emissions in the UK from cars have actually fallen since 1997, down 3.2 per cent from 72.2million to 69.9 million tonnes in 2005. That's despite a 16.5 per cent rise in cars on the road from 26.3 to 30.7 million."

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### **Manchester Congestion Tax**



Manchester is the first of the areas to get their plans for local

congestion charging off the ground. This is one of a number of cities or zones that are being "encouraged" (or "bribed" might be a better word) to try out such schemes by the Government's Transport Innovation Fund – Greenwich in London, which we have already covered in a previous newsletter, is another.

The proposed scheme involves the grant of £3 billion by the Government, and a Congestion Charge (i.e. toll tax) on major roads in the area – this is expected to be no more than £5 per day and apply in rush hours only. For some more information, but little actual data, go to [www.gmfuturetransport.co.uk](http://www.gmfuturetransport.co.uk)

The web site contains a number of “case studies” (the picture at the start of this article is of “Rachel” who appears in one of them). It now seems that these case studies are wholly fictitious and the photographs are of models or actors.

The scheme appears to be primarily a “tag and beacon” type of system. To quote from their web site: “Regular users would register to a franchised agent and payment would be debited from an account held by this third party agent as the car passes through an active charging point via the automatic reading of an in-car tag. The toll reader would be placed inside the car’s windscreen and would have a slot for a contactless smart card (much like London’s Oyster card). For occasional users, drivers will be able to pre-pay, registering their details with the agent, before passing active charging points.”

The scheme is likely to commence in 2012, but no information seems to be yet available on the costs of implementing or operating the scheme.

### Opposition from the ABD



The Association of British Drivers has formed an opposition group named MART (see example above of one of their posters). Their web site is: [www.manchestertolltax.com](http://www.manchestertolltax.com) where they are running an on-line petition which has already collected several thousand signatures. (Editor: if you oppose all road pricing systems like I do, don't forget to sign their petition). More information is also available on the ABD web site at: [www.abd.org.uk/manchester\\_congestion\\_charge.htm](http://www.abd.org.uk/manchester_congestion_charge.htm)

This is what the ABD says about the economics of the scheme: “The £3 Billion Government Grant includes £1.2 Billion from the ‘Transport Innovation Fund,’ £470 Million of which will be wasted just setting up the C-Charge. £2 Billion will be borrowed from a ‘loan shark’ known as ‘The Government.’ Alternatively, £7 Billion could be raised from the sale of Manchester airport, without lumbering Manchester with a £2 Billion loan and an unwanted, unnecessary, highly damaging congestion charge.”

The ABD campaign is led by Sean Corker who said "I believe that the Association of GM councils and the Greater Manchester Passenger Transport Authority are deliberately hiding the true cost of the Manchester Congestion Charge scheme. So far, the Council have admitted that the scheme will cost £470 million and claim that it will make an annual profit of £118 million. The council are denying the people of Manchester the chance to see for themselves if the proposed scheme passes one of the Council's key tests of offering value for money. If the scheme does not make the predicted yearly profit, where will Manchester find the extra money needed to make up the shortfall? Nobody in their right mind would sign up to a £2 billion loan if the small print was hidden, so why do Manchester Council think we should do so on this occasion?"

Trafford Council, which is in one of the areas that would be covered by the scheme, are running an on-line consultation at: [www.trafford.gov.uk:80/consultations/do.asp?ID=83](http://www.trafford.gov.uk:80/consultations/do.asp?ID=83) . Please take the time to visit their web site and give your views.

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### TfL, FOI and the Blackwall Tunnel

Conservatives on the London Assembly have discovered that Transport for London (TfL) received a report from consultants Mott MacDonald last year which advised that suspending tidal flow in the tunnel was not the answer and that TfL should focus instead on other measures to improve safety in the tunnel.

The Association of British Drivers (ABD) has been trying to obtain the facts behind the reason for the cessation of the tidal flow system since the 22nd April when a request was submitted for information under the Freedom of Information Act.

Although some accident data was received (which showed that accidents were minimal within the tunnel and probably better than most ordinary roads), the only other information was a report of a meeting of the TfL Surface Transport Strategy Board. No mention was made of the Mott MacDonald report and the request for other data was rejected on the grounds of cost. Although this was challenged, the ABD has still not received all the information requested (at the time of writing this on July 9<sup>th</sup>).

In addition an ABD member has also requested information on the opinion polls undertaken by TfL in relation to the proposed Greenwich Congestion Charge. TfL have revealed that a number were undertaken starting in early 2006, but they have suggested that the results cannot be released. This has also been challenged, but again the ABD has been kept waiting for no good reason.

The ABD suggests that this is symptomatic of a deep malaise within TfL where routine requests for information seem to be obstructed when it is clear that the requestor may be wanting to challenge TfL policy or their public announcements.

They seem to specialize in giving you a bureaucratic run around, when the law requires them to provide information promptly, and within 20 working days in most circumstances.

#### **TfL Ignored Their Own Consultants Advice**

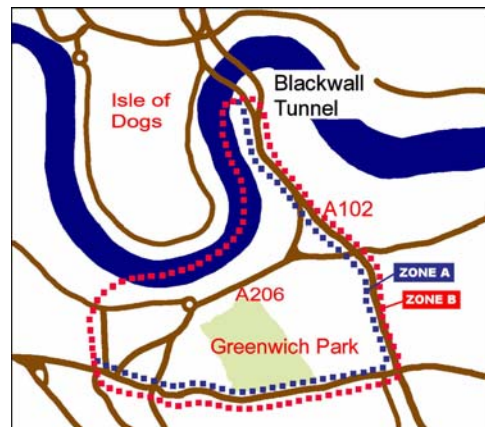
For example, in the press release issued by the Conservatives on the above discovery, London Assembly Member and M.P. Bob Neill said:

*“Their own advice told them that suspending tidal flow was not the answer, and that the accident rates were no higher than on similar roads. This proves that TfL’s decision was a gross over-reaction, and they were well aware that the tunnel could have been made safer using other measures. Their willful rejection of expert advice has condemned motorists using the tunnel to even more misery and travel chaos.”*

The ABD suggests that TfL clearly needs to be made more publicly accountable and pay more attention to the principles embodied in recent legislation concerning open Government.

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## **ABD Launches Campaign Against the Greenwich Congestion Charge**



We have covered the proposed congestion charge for the Greenwich area and the Blackwall Tunnel in previous editions. The Association of British Drivers (ABD) has now launched a campaign against it with over 100,000 leaflets delivered to local residents of the London Borough of Greenwich, a press release distributed, and an on-line petition web site set up – if you haven’t yet signed it, please go to: [www.gopetition.com/petitions/no-road-tolls-in-greenwich.html](http://www.gopetition.com/petitions/no-road-tolls-in-greenwich.html) . More information is also present on the following page of the ABD web site: [www.abd.org.uk/greenwichtolls.htm](http://www.abd.org.uk/greenwichtolls.htm) .

If you would be personally affected by this proposed scheme, or which to support our opposition more actively, then please contact the editor.

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## **Larger Tesco Store Approved**

The application by Tesco to expand the proposed Orpington Tesco superstore by the addition of a partial mezzanine floor was approved at a Development Control Committee on the 10<sup>th</sup> July.

There were two hours of representations and debate by councillors on the matter, but eventually the Committee Chairman used his casting vote to approve the matter after the committee was deadlocked at 7 votes all.

Councillors Simon Fawthrop and William Huntington-Thresher seemed to be most vigorously opposed to the application and gave numerous reasons under planning legislation for why the application should be rejected. Councillors Humphrey, Morgan and Bloomfield spoke in favour, as they saw no sound reason to refuse it. The balance was tipped by council planning and legal staff who suggested that the reasons given would not stand up in appeal, and risked the council unnecessarily incurring legal costs.

Local resident Ian Gilmour spoke against the proposal as did a representative of the Walnuts shopping centre – not very effectively in the latter case. Mr Gilmour particularly raised the issue of the Traffic Assessment and has argued that the traffic flows are a gross underestimate.

BBRAG has long argued against this proposal and submitted objections on both traffic issues and the inadequate parking. One revealing piece of information that came out at the meeting was that with the latest plans providing only 202 public parking spaces, and the previous 18 spaces for store staff being removed altogether, it was interesting to note that the Tesco spokesperson admitted that staff were likely to use the public spaces. And how many staff will there be? Between 150 and 200 at any one time.

BBRAG has pointed out many times that the new store was unlikely to provide enough parking spaces to meet the past public usage, and that is without the extra usage from store staff. Clearly it is a nonsense to suggest that the public space will be adequate to meet demand.

*(Editor: councillors on the Development Control committee have to take into account planning law. But this is such a complex body of law, and subject to wide interpretation, that you can argue almost any stance if you have a good lawyer. But as usual it seemed that council staff were determined to support their own recommendation and not let councillors use their own sound judgment. Regrettably some councillors do not seem to have a mind of their own and are reluctant to question the advice sometimes offered by council officers).*

## **Chief Planner Retires**

Stuart MacMillan, who has been the Chief Planner in Bromley for some years and has worked for the council for 36 years in total, has retired.

*(Editor: Mr MacMillan was undoubtedly a clever person and I well recall debating the intricacies of planning law with him on the original Tesco application. But he was also deeply involved in how this development moved from the original concept of being a moderate sized, "mixed use" development to be a massive superstore.)*

Council Chief Executive David Bartlett has also retired and the replacement is Doug Patterson. Mr Patterson has previously worked for both Harlow and Wokingham councils.

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## **London Congestion Charge Report**



Transport for London (TfL) have recently published their fifth annual monitoring report (see cover left). Its 265 pages of dense prose attempts to justify the scheme, but is in reality a minefield of obfuscation and misleading statistics. In addition in June

they published a report entitled "Ex-Post Evaluation of the Quantified Impacts of the Original Scheme" which attempts to provide further financial analysis and justification. Both reports can be obtained from the internet at: [www.tfl.gov.uk/corporate/projectsandschemes/roadsandpublicspaces/2287.aspx](http://www.tfl.gov.uk/corporate/projectsandschemes/roadsandpublicspaces/2287.aspx) if you have the time to read them. Otherwise the following highlights some of the salient points.

On page 2 of the Fifth Annual Monitoring Report it admits that "During 2006, TfL has observed a sharp increase in congestion inside the central London charging zone." But they blame this primarily on increased road works, although they also admit elsewhere in the report that other changes that have been made such as reallocating road space to pedestrians and buses might have had some impact.

They also say that “In addition, there is some evidence of a longer term ‘background’ trend of gradual increases to congestion”. In other words, congestion got significantly worse in 2006, and that has been part of a trend ever since the congestion charge was introduced in 2003. In reality congestion charging has not worked. Traffic speeds and congestion as measured by “excess delays” are almost back to where they were before the charge was introduced – and bear in mind that the year before the charge was introduced was a particularly poor one for congestion – allegedly due to manipulation by TfL according to some people.

The report also says that reductions in “emissions of key pollutants in and around the charging zone continue to be apparent” – but as we have pointed out before, this is not evident in actual measurements of pollution taken on the ground and the report itself confirms this.

Here is a breakdown of changes in vehicles entering the congestion charge from 2002 to 2006 (taken from Table 2.1 of the report):

Chargeable	
Cars	-36%
Vans	-13%
Lorries and others	-13%
Non-Chargeable	
Taxis	+13%
Buses and coaches	+25%
Powered 2 wheelers	0%

This tends to explain why pollution has not reduced because taxis and buses are generally diesel powered and often relatively “dirty” in comparison with modern cars. Even though the absolute numbers of taxis and buses may be lower, one bus generates a lot more pollution than one car, and as shown in another article in this newsletter, is not much different in terms of pollution per occupant. In reality the former car users tend to have moved to using buses and underground usage has not changed much, so there is little or none environmental benefit.

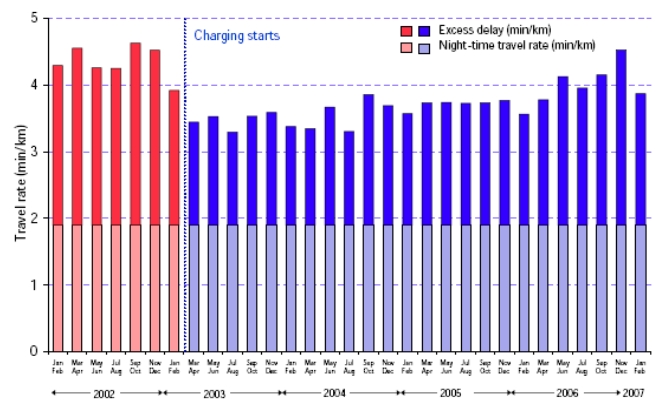
In 2006, congestion within the zone probably worsened because the cars, vans and buses who entered the zone actually drove further – up by 4%, 3% and 3% over the previous year (see table 2.4).

That rather demolishes the argument that the extra congestion was caused by road works, because if that was the case they would have probably been stuck in queues and been able to drive fewer miles, not less!

### Traffic Volumes and Speeds

The report also says (page 29): “The data are tending, however, to consistently suggest increases in the numbers of non-chargeable vehicles circulating within the zone”. In other words, the free road space created by charging private motorists has been filled up over the years by more vehicles such as buses and taxis with the net result that traffic on some road links is back to where it was before.

Figure 3.1 Congestion in the central London congestion charging zone during charging hours (07.00-18.30). Moving car observer surveys.



The above figure taken from the report which shows the “excess delays” is particularly revealing. Just look at the peak in Nov/Dec 2007, where congestion is back to where it was before the charge was introduced. (Editor: and backs up my personal experience of driving in central London at that time when congestion seemed to be worse than ever).

To take another statistic, average road network traffic speeds in 2002 were about 14 km per hour. To quote from page 47 of the report: “Since 2003, average observed charging hours speeds have progressively fallen back, to about 16 km per hour in 2005 and 15 km per hour in 2006”. Of course they allege that speeds would have fallen even further if congestion charging had not been introduced, but they provide no substantive evidence to support that claim.

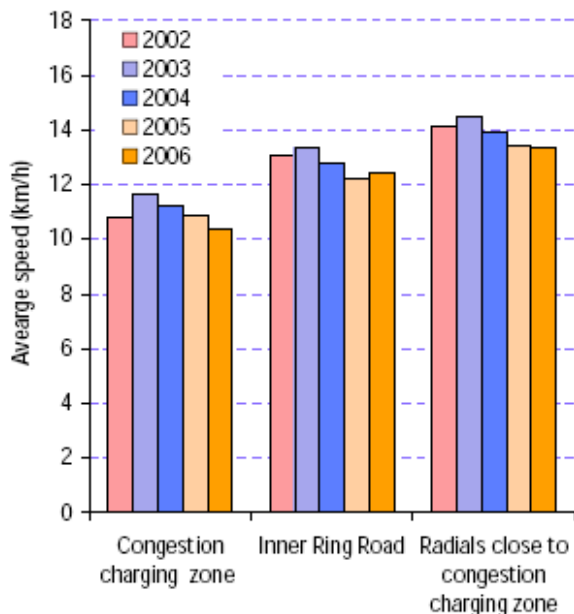
## Evening Standard Confirms Falling Traffic Speeds

The London Evening Standard has confirmed that traffic speeds have been falling by performing independent tests. This involved drivers taking set routes and repeating tests that were also performed in 2006 and 2005. They claim that in February, after the western extension of the Congestion Charge was introduced, average traffic speeds fell to 6.1 mph (from 8 mph in 2006 and 12 mph in 2005).

The TfL report provides little information about the impact of the western extension on the original charging zone which was expected to increase traffic within the original zone because many more residents will be eligible for a discounted pass.

## Buses Are Going Slower Also

It's not just general traffic that is going slower, even bus journeys are taking longer, as the following chart from table 4.2 of the report shows. Journey times, particularly within the congestion zone have been getting worse consistently since 2003.



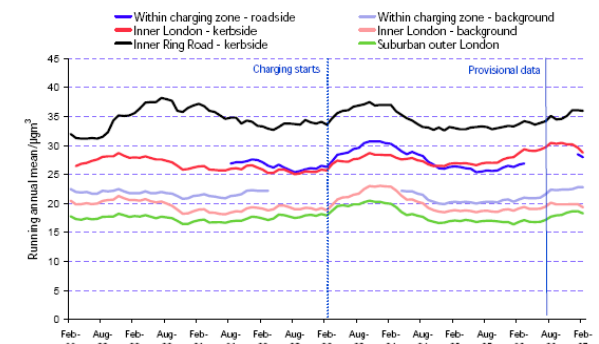
## Air Pollution

Page 56 of the report really gives the lie to their claims on air pollution benefits. It says “Trends in actual measured air quality (as opposed to emissions) across London continued to reflect the diversity and dominance of external factors in determining pollutant concentrations and, as such, did not allow the identification of a clear ‘congestion charging effect.’”

In fact there should have been measurable reductions in pollution because TfL have calculated that the updating of road transport vehicles with new technology should have reduced NOx by 17.3%, PM10 by 23.8% and CO2 by 3.4% within the charge zone from 2003 to 2006 (page 66). But even that impact is not measurable so it seems that pollution has increased for other reasons to offset those benefits (which of course have nothing to do with the congestion charge implementation). Of course if vehicles drive around the zone to avoid paying the charge, then total pollution can increase within the zone because pollution can blow into the zone from outer London.

Here’s an interesting chart from the report which shows the mean PM10 concentrations (diesel particulates – known to be cancer inducing). Notice any trend?

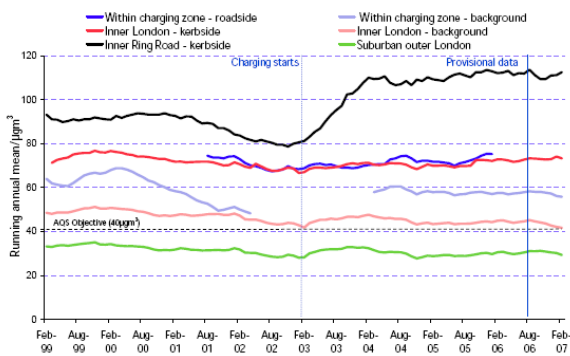
Figure 4.7 Running annual mean PM10 concentrations at congestion charging indicator sites.



Yes you’re right – there is no discernable trend!

Or look at the following charts of NO<sub>x</sub> concentrations:

Figure 4.10 Running annual mean NO<sub>2</sub> concentrations at congestion charging indicator sites.



Not much change except on the “Inner Ring Road – Kerbside” where it is clearly worse.

### Penalty Charge Notices

It is worth looking at the number of penalty charge notices issued (at £100 each of course, with a discount for prompt payment). The number issued has been coming down – at least that was the case although the impact of the western extension on the numbers is not yet known. But they are still averaging about 100,000 per month. In addition 26% of them are not “recovered”, ie. never paid presumably. As a result some 741,000 warrants have been issued to bailiffs since the start of the scheme.

*(Editor: it seems astonishing to me that any scheme is seen as successful when there are so many infringements. These are presumably both deliberate ones and accidental ones, but if the former, then there are obvious defects in the system and if they are the latter, then public support is clearly weak).*

### The Economics

This is what TfL gives as the economics of the scheme in the last year:

Table 6.2 Scheme revenues and costs, financial year 2006/2007. (£million provisional).

Revenues	
Standard daily vehicle charges (£8)	125
Fleet vehicle daily charges (£7)	27
Resident vehicles (£4 per week)	6
Enforcement income	55
<b>Total revenues</b>	<b>213</b>
Total operation and administration costs	-90
<b>Net revenues</b>	<b>123</b>

But when you study the other report mentioned above, you find there are £25m per annum of amortised “infrastructure costs” not included in the above. In reality the economics actually looks like the following – this is a table taken directly from page 99 of the TfL “Annual Report and Statement of Accounts” available on the web at <http://www.tfl.gov.uk/assets/downloads/corporate/annual-report-and-statement-of-accounts-06-07.pdf>

	Note	Group and Corporation 2006/07 £m
Revenue	2	252.4
Direct expenditure:		
- Toll facilities		(130.1)
- Traffic management		(0.3)
		122.0
Other expenditure:		
- Financial assistance		(2.5)
- Depreciation		(4.8)
- Western extension zone start-up costs		(12.2)
- Administration and support services		(13.4)
<b>Net income on congestion charging</b>		<b>89.1</b>

Note how low the proportion of net income is to revenue – it must be one of the least efficient methods of collecting tax ever devised with 65% of revenue being wasted on collection. And without the income from “enforcement” of £55million it would be unsustainable.

The report shows that 82% of the surplus is spent on supporting bus operations and none on other transport modes other than walking and cycling. But of course, the improvement in bus services in London has not been financed by the congestion charge – the contribution last year according to TfL was £101m when the subsidy to bus operations is running at more than £600 million per year, excluding the subsidies paid by the London boroughs to fund free bus use for their elderly residents which TfL counts as “income” (see page 72 of the TfL Annual Report and Statement of Accounts).

But Ealing Councillor Phil Taylor has pointed out that even the above figures do not reflect the true situation. What matters with any major capital investment project is the actual cash flow. From the above, one might conclude that cash is being generated to fund public transport, but this is far from the reality.



The following is his analysis of the data showing the actual cash movements related to congestion charging since the scheme was introduced:

£ million	2002/3	2003/4	2004/5	2005/6	2006/7	Totals
Revenue	18.5	186.7	218.1	254.1	252.4	929.8
Expenditure - Toll facilities	-58.2	-120.9	-120.8	-143.5	-155.7	-599.1
Expenditure - Traffic management	-4.2	-2.0	-0.6	-0.4	-0.3	-7.5
Financial assistance/deferred charges	-14.0	-17.2	1.7	0.0	-2.5	-32.0
Depreciation	-0.3	-1.1	-1.6	-2.8	-4.8	-10.6
Capital financing charges	-0.1	-0.2	-0.4	-1.1	???	-1.8
Net income	-58.3	45.3	96.4	106.3	89.1	278.8
Capital spending	-161.7	0.0	0.0	0.0	-103.0	-264.7
Cummulative cash flow	-220.0	-174.7	-78.3	28.0	14.1	14.1

So you can see that he estimates that the total cash generated by the Congestion Charge since it was introduced is actually only the paltry sum of £14 million in total over the five years it has been in operation. A truly ridiculous level of return on the capital invested in this project. More information is available from Phil Taylors blog at: <http://philtaylor.org.uk/?p=726>

### Summary

Surely these reports are damning evidence of the failure of the congestion charge system? But nobody in TfL seems to be willing to admit it. What a great shame that all this money and the efforts of thousands of people were not redirected into a more productive channel than recycling money from motorists into the pockets of Capita Plc (who operate the system) and its call centre operators.

## The £25 Congestion Charge



Transport for London (TfL) and the Mayor are keen to screw more money out of motorists despite the failure of the existing central London congestion charge system to cut congestion or

improve air quality. So the latest proposal is to introduce a new £25 charge for those vehicles that emit more than 225 gm/km of CO<sub>2</sub> – this basically applies to large luxury vehicles but it also covers some more mundane ones – the CO<sub>2</sub> figures for your own vehicle is present on the vehicle license document.

Vehicles in band G, plus some in band F will be charged £25 instead of £8, and those who currently get a residents discount who own such vehicles will have to pay the full £25.

The only beneficiaries will be those who own vehicles in bands A and B and which are compliant with the Euro4 emissions standard. More details are present at [www.tfl.gov.uk/CO2Charging](http://www.tfl.gov.uk/CO2Charging).

### Why This Proposal is Iniquitous

As the author repeatedly asked Ken Livingstone on national television, “what is the likely saving in emissions from this proposal” (see last edition)? Well the answer is quite clear from the detailed TfL report on this proposal which is perhaps why Livingstone didn’t answer the question - basically there will be negligible impact. In reality it might actually make air pollution worse.

To quote from the report: “Overall, the direct effects of the proposals on car use in the short term are expected to have a small positive impact on CO<sub>2</sub> emissions. The short term impact on air quality is expected to be very small; and the whole life impacts is expected to be minimal.” Or refer to para 4.4.19 where it suggests the financial benefit of CO<sub>2</sub> reductions is likely to be in the range of £0m to £0.2m.

It’s very simple to calculate the likely impact. As the Mayor has pointed out, only 8% of cars registered in London will be affected. But only about 10% of the CO<sub>2</sub> emissions in London are created by private cars. So even if all those car owners instantly stopped using them, the benefit might be only 1% (ie. 8% of 10%, allowing for the fact that most vehicles in band G are only slightly higher than the 225 gm/km limit).

In practice, a third might stop driving into London, a third might pay the charge, and a third might switch to a lower emissions vehicle – in the last case they are very unlikely to save more than 50% of emissions as most vehicles in Band G only slightly exceed 225 gm/km and they are likely to switch to vehicles that are just under the limit. So adding all this up, the likely benefit is about 0.5%. Who will notice the difference? Nobody!

Offsetting this benefit will be the fact that Band A and B vehicles will now be allowed to enter the Congestion Charge zone without paying so they will be likely to increase in numbers.

Even if they are producing only 100 gm/km each, if the number of vehicles rises substantially then the net benefit seen from reduced numbers of larger vehicles may be wiped out altogether. It could even go negative.

Also some of the luxury car drivers might simply switch to using taxis which again will not provide any benefit because they are some of the most polluting vehicles in London with high levels of CO2 emissions. In addition if some of the drivers switched to more economical diesel vehicles, emissions from diesel vehicles might rise substantially when these are known to be more dangerous to health and create more total emissions (other than CO2) than those from petrol engined vehicles.

There is also no financial benefit overall, except that up to £36 million of extra revenue might end up in the pockets of TfL.

### **Why This Proposal is Also Illogical**

The charge will be £25 instead of £8 for vehicles emitting more than 225 gm/km. That's more than 3 times the cost, when in reality the additional CO2 emitted might only be a few percent more. Most band G vehicles emit less than 300 gm/km, with many very near the 225 gm/km limit.

There is no fairness or consistency in having to pay 3 times as much when you are emitting only a few percent more. Any such scheme should have a graduated scale which is related to the amount of emissions. Otherwise it creates perverse incentives – for example, it will be cheaper to have two cars and use them within the zone, even though you are emitting more CO2 than one larger car.

There is no real need for an additional tax incentive for people to purchase and use lower emitting cars as central Government is already providing that incentive from the vehicle license system. Emissions from cars have actually been falling in recent years as a result.

One particularly unjust aspect of this scheme is the impact on the owners of larger vehicles, many of which are of luxury models and hence would typically normally last for many years. Owners of these vehicles do not normally change them frequently, and the residual second-hand values may drop substantially as a result of this proposal. Why should such vehicle owners suffer in a way they could not have anticipated when they purchased their vehicles a year or two ago?

### **Make Sure You Object**

Even if you are not going to be personally affected by this proposal, you should object. If the Mayor and TfL can get away with this illogical attack on a small minority of motorists in the false name of “environmental benefit”, then what may they come up with next?

Go to the web site and fill in their questionnaire, or write to Emissions Related Congestion Charge Consultation, J31210, Ipsos MORI House, 79-91 Borough Road, London SE1 1FY. You should also consider writing to your local MP, and your Greater London Assembly representative.

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### **Higher Penalties for Congestion Charge Infringers**



Bearing in mind the poor economics of the Congestion Charge system covered above, is it surprising that TfL are now also proposing to put up the penalty charges? The standard charge will rise from £50 to £60 if paid promptly, and other charges are similarly increased.

They justify these increases on the basis that they need to be brought into line with the higher penalties now for certain types of parking and traffic offences – for example parking on a zebra crossing. But this argument doesn't stand up to scrutiny when clearly most of the congestion charge infringements are accidental, and do not involve any road safety issues.

With 100,000 people per month collecting penalties, it seems to the writer to be just another excuse for TfL to increase their income. Infringements are falling, i.e. compliance is rising, so it would make more sense to reduce the charges not increase them. TfL is performing a public consultation on this issue, so make sure you submit your own comments by going to [www.tfl.gov.uk/corporate/projectsandschemes/roadsandpublicspaces/5238.aspx](http://www.tfl.gov.uk/corporate/projectsandschemes/roadsandpublicspaces/5238.aspx) (it's the consultation on Variation Order No. 3).

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## Response to Hump Petition



The Prime Minister has responded to the "ban all speed humps petition" initiated by your editor - which collected 6,800

votes. The response can be seen on the internet at: <http://www.pm.gov.uk/output/Page12529.asp>

It is defective on several grounds. My comments

1. Nobody disagrees that speed humps reduce speeds, but that does not translate into reduced accidents as claimed.
2. It refers to TRL report 614 which I have studied and which is a very defective - they only tested a very limited range of vehicles and car models - also there was no testing of a variety of people including those with common medical conditions (although they admit that humps could be damaging to some). The failure of TRL 614 to report any damage to vehicles simply does not accord with the experience of many people, including myself, and there has never been any attempt to collect any statistics on such damage, or to identify accidents and injuries actually caused by humps - there are a number of such reports on my web site of course.
3. They make no reference at all to the extra deaths and injuries of ambulance and other emergency delays.
4. They say "there is no evidence to suggest that the emergency services oppose the use of road humps", but in reality emergency services very

frequently oppose the use of humps when they bother to respond at all to the required consultations on them.

Unfortunately, with such feeble responses now being generated to such petitions, the whole concept of on-line democracy is being undermined and people are losing interest in signing them.

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## More Camera Enforcement Proposed

London boroughs are already collecting massive amounts of revenue from camera enforcement of parking, yellow box junction and turning infringements. Transport for London are now proposing that they be able to use similar powers to enforce cycle lanes and stop line contraventions (advanced stop areas for cyclists).

Such powers would need to be incorporated in a new London Local Authorities Bill.

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## Thames Gateway Bridge – A Victory for the Luddites?



It seems the proposed Thames Gateway Bridge (artist's impression above) may be history. Indeed all major bridges may be based on the result of the public inquiry into this proposal which recently produced its final report after two years of work. The inspector, Michael Ellison, recommended to the Secretary of State for Transport that permission be refused. His major reason for doing so was simply that it might encourage people to travel!

Under Planning Policy Guidance 13 ("PPG13") which has been in effect for some years, planners need to take account of "the impact of the proposal on traffic generation and overall travel patterns having regard to the desirability of achieving development that minimises the need to travel, particularly by private car".

Although Transport for London (TfL) argued that the bridge was needed for “regeneration” of the area, the inspector suggested that they had not proved their case that such regeneration required a bridge to be built. In any case he considered PPG13 should take overriding precedence.

So if other inspectors follow the same approach, it is going to be almost impossible to justify any new bridges. Bridges enable people to undertake journeys that they otherwise could not practically make, or could not otherwise afford, so they are bound to be in conflict with PPG13.

There were a lot of objectors to the bridge on environmental grounds, but in fact the environmental impact would have been negligible – indeed in some respects it would have been improved. In addition the access roads had been deliberately kept poor to deter long-distance traffic, and the tolls set at a high level to reduce traffic volumes (with a discount for local residents). The Mayor of London even contributed £65,000 to help the objectors make their case.

The general attitude of the inspector can be gauged from this paragraph in the report which refers to the results of the public consultation: *“It was clear, for example, that a disproportionate number of individual motorists had responded to the consultation. The results were then presented without adequate warning of their shortcomings.”* On what does he base that allegation? He doesn’t say, and as so often nowadays it tends to suggest that motorists are in some way being classed as second class citizens and should be ignored whatever they say.

But the Secretary of State for Communities and Local Government, Hazel Blears, has subsequently announced that the public inquiry will be reopened. It will be asked to look again at the regeneration and environmental issues.

Note that Ken Livingstone and TfL have been strong advocates of this bridge – one of the few positive decisions that Mr Livingstone has made to improve the road network.

He said *“Any delay to the Thames Gateway bridge is a blow to east London, and south-east London in particular. The reopening of the public inquiry will delay bringing the benefits of the Thames Gateway Bridge to an area that sorely needs them. This new crossing is crucial to supporting plans for an extra 160,000 houses in the Thames Gateway region and up to 42,000 additional jobs in the area as whole.”* Presumably he was hoping the Government would ignore the inspector’s recommendation and proceed with it anyway.

*(Editor: what a farce! This bridge was being talked about when I lived on Thamesmead 30 years ago. It was needed then, and it is needed now, but has still not been built. The public inquiry took much too long, ignored the financial benefits of the bridge and the other benefits it would bring to the users, and was ultimately hobbled by the ridiculous and luddite PPG13 regulation).*

### **BCC Calls for Reform of Planning System**

The British Chambers of Commerce have launched a campaign to reform Britain’s planning laws – see their new web site at [www.getbritainmoving.co.uk](http://www.getbritainmoving.co.uk) . They complain it takes too long to get approval for new road developments and want an independent commission to make planning decisions on national infrastructure projects.

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### **West London Tram is Dead**

A piece of news that was quietly announced during the peak holiday season in early August was the climb-down by Mayor Livingstone over the West London Tram. This scheme, which involved running a tram down the already congested roads of Ealing and other boroughs, stirred up enormous numbers of objections from local residents and had some impact on the result of the last council elections. Just one of the organisations formed to oppose it was “Save Ealing Streets” ([www.ealingstreets.org](http://www.ealingstreets.org) ) but it shows how it is possible to defeat misconceived proposals put forward by the Mayor and Transport for London if some effort is put in. Regrettably though some £30 million of public money has been wasted on this project.

What did the Mayor actually announce? This is what his press release said: “Ken Livingstone, Mayor of London, today joined Councillor Jason Stacey, Leader of Ealing Council, to announce that, on the assumption of a positive government decision on the construction of Crossrail, the Mayor and the local boroughs will work together to address the problem of improving public transport on the Uxbridge Road, between Uxbridge and Shepherd’s Bush, via a bus-based solution rather than the tram originally envisaged. This is because Crossrail would significantly increase public transport capacity in the area reducing the need for a tram and making a bus solution more practical.”

The full press release can be seen on the web at: [www.london.gov.uk:80/view\\_press\\_release.jsp?releaseid=13158](http://www.london.gov.uk:80/view_press_release.jsp?releaseid=13158)

*(Editor: The Mayor is adept at putting “spin” on bad news. In reality the Crossrail project is not certain to go ahead and the Government is still sitting on its hands regarding funding of that scheme – and quite rightly in my view bearing in mind my past analysis of the cost/benefit ratio. It was conspicuous that in the recent Government announcement of major improvements to the rail network – such as to the Thameslink line and Reading and Birmingham stations – no mention was made of Crossrail at all.*

*Also of course, Crossrail was never judged to have an impact on the proposal for the West London Tram and such linkage was rejected in the original proposals for the tram.*

*Anyway let us all rejoice that at least one tram scheme has been killed off. As this newsletter has repeatedly pointed out, tram schemes are usually financial disasters and for less money you can improve bus services to provide the same level of public transport capacity while avoiding the negative impact of trams on other road users and on local residents).*

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## The Four Hills Speed Hump Study

The advocates of speed humps often make grandiose claims about their effectiveness in reducing accidents. But a recent study is yet another one that debunks these claims.

The report recently published by Michael J. Cunneen is a study of the impact of speed humps in the Four Hills area of Albuquerque, New Mexico. One of the most interesting aspects of this report is that it includes one of the largest studies of the accident figures before and after the installation of speed humps in 93 street sections in Albuquerque. Over 1,100 accidents had occurred in these streets in the two years before and after speed hump installation. From this large sample, it was found that the aggregate accident rate for all accidents and for injury accidents had declined between 6-7%. But as the report suggests that the overall trend accident rate reduction in New Mexico was 1.7% per year, the net benefit allowing for that "control group" is therefore 6.8% less the 3.4% (spanning over 2 years) giving a net benefit of only 3.4% .

This is obviously much less than the claims made by many people for the effectiveness of speed humps at reducing accidents. In addition the report demonstrates that the fatal accidents saved by speed humps are likely to be less than the increase in deaths caused by delays to emergency service vehicles.

The full report is available from this web site: [www.bromleytransport.org.uk/Four\\_Hills\\_Study.htm](http://www.bromleytransport.org.uk/Four_Hills_Study.htm)

Note there are a few points worth making on this report, as even the 3.4% improvement is questionable. The report data is based on 2 years before and after as that was all the data that was available but that is a relatively short period. In the UK it is normal to use 3 years before and after as the normal basis for comparison. The reason is because in the first year after making any changes to a road layout, the accidents tend to fall. When drivers, who may only use the road occasionally, notice it has changed, they take extra care and drive more slowly. This effect wears off after a few months, but it has a big impact on the first year post the change.

Another problem is that it is very common for other changes to be made when humps are installed - for example improved signage (even extra warning signs), repainted road markings, new kerb alignments, etc. So the alleged benefit of 3.4% could be due to other reasons - and signs alone can have that size of effect.

A third possible explanation is a "Hawthorne" effect known from industrial psychology, where if you experiment on humans and suggest there will be a benefit, then you will end up seeing one. Unfortunately human behaviour, and reporting of accidents, is subject to unconscious biases that distort the results.

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### New York Road Tolls in Doubt



Proposals by New York Mayor Michael Bloomberg for a congestion charge similar to London's ran into major political difficulties in July. State politicians blocked the scheme effectively. But the Mayor is not giving up and there has been agreement to set up a 17-man "Traffic

Congestion Mitigation" committee. Any proposals they come up with are likely also to depend on at least \$250 million of funding from Washington which is far from certain.

Local opposition is also far from over, and as Assembly Speaker Sheldon Silver said "The negotiations have just begun".

Of course the recent failure of the subway system over a large area caused by flooding after a rain storm hardly supported the Mayor's proposals.

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### Letters

From Gerlinde Southey on the subject of the Freedom Pass covered in our last edition:

*Dear Mr. Lawson,*

*As to the Freedom Pass - I feel I pay so much council tax, it is only a small token to have the freedom pass. I would be prepared to pay say £50 - for a yearly pass, providing the money does not flow into the moloch of Ken Livingstones coffers.*

*On the other hand, if you are ever on a bus route/line, you do not use frequently or it is the first time, asking a bus driver for information is absolutely hopeless - they often do not even know the name of the road they are driving their bus through or any other particular information on where to get off.*

*More and more obstruction for traffic - when will the time come for free continuous flow? Just policies to make a drivers life like a road from hell!!! Road tax should not go in general government funds, but be kept separate for road improvement, repair etc.*

*And the mayor of London should NOT be empowered to behave like a dictator and ignore the general public's wishes - consultations? my foot - just a waste of money and then totally ignored.....Gerlinde Southey*

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### News Snapshots

Sundry news in the last few weeks that is worth a mention is as follows:

+ Ten year old Christina Franqui was seriously injured when her school bus went over a speed hump too fast in New York. She suffered internal bleeding from the kidney and spent some time in hospital as a result. Although she was wearing a seat belt, she was jolted out of her seat and fell on the floor. (Editor's comment: yet another example of a speed hump causing serious injury – there are others on the BBRAG web site).

+ Ken Livingstone has attacked the expenses claimed by Brian Coleman, Vice Chairman of the London Assembly for taxi fares. At £10,334 for last year, Mr Livingstone said that “Using public transport is crucial to cutting congestion, pollution and tackling climate change. So rather than swanning around London in a chauffeur-driven car, Mr Coleman should be cutting down on the receptions, lunches and dinners and set an example to Londoners by using buses, the tube, or even walking occasionally”. *(Editor: seems to me more an example of the pot calling the kettle black after previous reports of Mr Livingstone’s use of taxis).*

+ According to the National Audit Office, 5% of vehicles are unlicensed, and 37% of all motorcycles are unlicensed. Meanwhile Jenny Jones has been complaining about the number of “hit and run” accidents in London, which have been rising. *(Editor: No doubt intelligent readers can figure out the connection here, and why so many drivers now find it best not to be licensed or to be otherwise untraceable – the spread of speed cameras and the congestion charge may be relevant).*

+ For those people not yet fed up with signing on-line petitions, here is a really worthy one: <http://petitions.pm.gov.uk/lgowatchers> . It’s a petition to scrap the Local Government Ombudsman service based on its biased operation and failure to rectify injustices. More information on the operation of this service and the justification for the petition can be obtained from [www.ombudsmanwatch.org](http://www.ombudsmanwatch.org)

+ Note: Your editor did receive a complaint about the last newsletter. It seems some of the graphics in there were not as sharp as one reader would like. This is because the whole newsletter is kept as small as possible to minimise download times, and to save on your disc space. If any reader would like a higher resolution version (typically over one megabyte) of any newsletter then just ask.

## Contact Information

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B.B.R.A.G. Chairman and Newsletter Editor: Roger Lawson (Tel: 020-8467-2686, fax: 020-8295-0378, Email: [roger.lawson@btclick.com](mailto:roger.lawson@btclick.com)). Contact the above for information on the aims and objectives of B.B.R.A.G. or for membership information (membership costs £12.00 per annum for individuals, or £9.00 if you opt to receive our Newsletter via email, or £50 for corporate membership). B.B.R.A.G. would be happy to advise or assist anyone who is concerned about any traffic, transport or road safety issues in the borough.

Our internet web address is: <http://www.bromleytransport.org.uk> . This contains much useful information including articles extracted from our newsletters. It also contains a "News" page which is updated regularly with items of topical interest.

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## BBRAG Background Information

The Bromley Borough Roads Action Group (B.B.R.A.G.) stands for a more democratic and more rational approach to the traffic management problems of the London Borough of Bromley. Our initial formation some years ago was based on opposition to the kind of traffic calming scheme that was being introduced in the borough that simply caused more traffic congestion, and general inconvenience to road users, without any significant benefit in terms of road accident reductions. In fact, the money wasted on such schemes could have been much better spent on actual improvements to road safety in other areas. We now take a more general interest in all transport and associated environmental issues in the borough of Bromley and the greater London area. This includes traffic management schemes, public transport, road safety, parking policies, air pollution, other transport environmental issues such as noise, and associated local and central government policies. Our prime objective is to promote improvements in the transport infrastructure while stopping wasted expenditure on unpopular, ineffective or inappropriate policies.