



# BBRAG NEWS

Bromley Borough Roads Action Group - No. 54 (Sept 2008)

## In This Issue

- **London Congestion Tax**
- **Western Extension Consultation**
- **Wide Area 20 Mph Speed Limits**
- **Pedestrianisation of Parliament Square**
- **Clock House Permit Parking Scheme?**
- **News Snapshots**
- **B.B.R.A.G. Information and Contacts**

## Editorial

*The main story in this edition is the Consultation on the Western Extension of the London Congestion Charge Zone. Don't forget to record your vote as soon as possible. Let us hope that the resulting decision is a first step in getting rid of the whole uneconomic scheme.*

*This newsletter is a bit shorter than normal simply because it was important to get this out so you receive it before the closing date of that consultation.*

*The other main story is the issue of wide area 20 mph zones which have become a matter of topical interest in my local borough.*

*Don't forget to send us comments on any of our articles for publication.*

Roger Lawson  
Editor

## London Congestion Tax



Transport for London (TfL) have produced their Sixth Annual Monitoring Report for the London Congestion Charge (aka "tax" – don't let the words used fool you that this is anything but a tax on travel).

This latest report shows that this unnecessary and unreasonable tax has not resulted in any benefit in terms of congestion on the roads of London. Indeed although they claim traffic levels are down, they had to admit that "congestion rises back to pre-charging levels".

They suggest that much of this can be accounted for by road works, and in particular in the Western Extension by a major redevelopment at the Scotch House Corner junction, but this is very doubtful. Road works are a continuing fact of life to road users in London and have been for many years – indeed there were complaints in the year before the Congestion Charge was introduced that the large number of road works at that time would distort analysis of any improvements in traffic flows in the following years.

In reality the Congestion Charge was never likely to have a major impact on traffic volumes, and all that has happened is that a few fast moving private vehicles have been replaced by slow moving buses and taxis, which obstruct other traffic. That is the main reason why Congestion Charging has not worked.

Mayor Boris Johnson has said the London Congestion Charge is "a blunt instrument", which is surely why he should consider scrapping the whole system.

## Western Extension



The western extension is even more obviously a failure

The report also says “Recent results have returned

congestion values that are similar to pre-extension levels, indicating that the western extension is currently experiencing no material congestion relief”. Instead of it taking 5 years to demonstrate how ineffective congestion pricing schemes are as with the central zone, this has been shown within one year in the western extension. Even bus speeds and reliability within the Western Extension have stayed the same or got worse, as is true for the central zone also.

Business owners and employers in the western extension reported weaker sales and profitability in 2007 compared to 2006 in a TfL telephone survey of local businesses. There were also negative comments from disabled people reported by TfL such as:

“I have friends from Bristol who come and visit me, but it has to be at the weekend now... I don't see them as much as I used to.”, and: “People wouldn't take me to places that they used to ... you don't ask people to do things because you know it costs money.”

### No Environmental Benefits

The TfL report also says “no clear scheme impacts from either the original central or western extension zones can therefore be discerned” in ambient outdoor air quality. It's a myth that congestion charge schemes generate any environmental benefits but car haters continue to promote this agenda.

It is particularly odd that no discernable benefits can be seen as TfL admit that the “background change to the emissions performance of the vehicle fleet is significant” as newer, and more environmentally-friendly vehicles, replace older ones.

The full TfL report can be seen at:

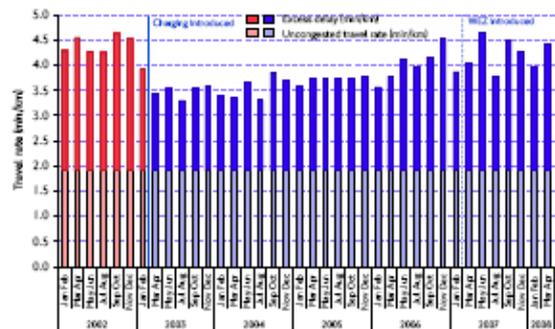
[www.tfl.gov.uk/corporate/media/newscentre/8948.aspx](http://www.tfl.gov.uk/corporate/media/newscentre/8948.aspx)

### Worse Congestion With Less Traffic

Although the Western Extension cut traffic entering the zone by 14% (but traffic circulating within the zone is down by only 10%) and the original congestion zone has reduced traffic by 21%, there is no corresponding reduction in perceived congestion.

Congestion is measured by driving sample routes in the middle of the night, and then during rush hours, and the additional time during the latter runs are used as a measure of congestion. The figure below taken from the TfL report shows the trend in the main zone.

Figure 4.1 Congestion in the original central London charging zone during charging hours. Moving car observer surveys.



As you can see, the trend has been consistently rising since the charge was introduced. Even more revealing is the fact that the base “night time” journey times have increased by about 21% within the zone and 22% across the whole of London between 2004 and 2007. This shows how much normal traffic speed has been reduced by additional traffic lights, revised traffic light timings, road narrowing, road closures and developments such as the pedestrianisation of Trafalgar Square.

Even TfL admit that “reduced network capacity” has been seen in recent years because of Livingstone's policies but even removing these bottlenecks will not mean congestion charging would have any positive impact because it is the difference that is measured by the chart above.

## The Economics

TfL claim the scheme generated a surplus of £137 million in 2007/2008. This has improved over previous years because of the western extension but also because penalty charges were increased substantially at the end of 2007. In fact £73m of the surplus comes from penalty charges even though only 73% of those issued are paid.

However, those figures seem to not take account of all the capital costs and the true picture of the economics of the scheme is very different. On a cash basis it seems unlikely that it has actually generated any surplus at all as yet. For more information on this see the analysis in the note on the previous TfL report at: [www.freedomfordrivers.org/London\\_Congestion\\_Charge\\_Report\\_July2007.pdf](http://www.freedomfordrivers.org/London_Congestion_Charge_Report_July2007.pdf)

The ABD will continue to campaign against all road pricing and congestion charging schemes, and we would like to see the London scheme totally abandoned. This was part of a strategy developed by the former Mayor which included reallocation of road space from one type of road user to another which treated private car users as second class citizens. His strategy to solve London's transport problems has been totally discredited by the latest report.

## Western Extension Consultation



The Association of British Drivers (ABD) have launched a major campaign to advocate the total scrapping of the Western Extension during the consultation period

recently announced by the Mayor. They claim the Western Extension was not wanted by residents of the area and has had numerous detrimental impacts on business and community activities. But they welcomed the Mayor's commitment to consult the public again on this matter.

The campaign is being fought in co-operation with the West London Residents Association who vigorously opposed the original introduction of the scheme. About 150,000 leaflets are being distributed in total in areas around the Western Extension and within it.

## Original Objectives Not Met

In summary they say the scheme has not met its original objectives. It has not reduced congestion in the extended zone, and neither has it improved air quality so there are no environmental benefits.

Mr Livingstone claimed it would reduce congestion by 10-20% (see <http://www.tfl.gov.uk/corporate/media/newscentre/archive/4375.aspx> for his original press release). But this has not turned out to be the case and congestion is unchanged in the Western Extension.

## Grossly Misleading Consultation Document

The consultation document from Transport for London is very badly designed and contains numerous misleading comments.

The new consultation continues to propagate myths about the success of the scheme. It says "It is clear that without the Western Extension in place, congestion would be worse". The ABD says there is simply no evidence to support this statement and that it is in essence a lie.

It also says "it has helped to reduce vehicle emissions" but again there is no evidence to support this. The reduction in "net revenue" of £70m that they claim is in the view of the ABD a figment of their imagination and they suggest that the surplus of income over expenditure for the Western Extension is more like £15m so scrapping it would not reduce income by the amount claimed.

In addition it suggests that the Western Extension has had no obvious impacts on business and the economy which flies in the face of commonly reported facts.

## Wording of Response Questions Biased

Even the wording of the response form on the Consultation Leaflet is designed to obtain a biased response with Option 2 containing a reminder that residents would lose their discount, while the Option 1 response does not remind people they would continue to pay the charge.

And the proposed option of a 100% discount for residents seems to be simply a bribe to residents of the zone to retain it.

### **Make Sure You Vote**

Please make sure you record your vote against this scheme. Go to this page of the ABD London internet web site for more information and a link to the Transport for London response form: [www.freedomfordrivers.org/WesternCon.htm](http://www.freedomfordrivers.org/WesternCon.htm) (or you can call 0844-4154425 for a paper response form).

We recommend that you simply vote for Option 2 (to scrap the Western Extension) and do not tick any other boxes to avoid any confusion when the results are analysed. You can of course make any additional comments you wish in the comment box.

Note that anyone can respond to this consultation so do not let the fact that you live in other parts of London, or even outside, deter you from doing so.

However you should not have any difficulty in voting as there are no apparent checks on who submits responses to the consultation with missing or fake post codes allowed, multiple responses, etc. Analysis of the results will also be a nightmare due to poor survey design. But don't let these issues deter you from sending in your comments – it is important that as many people as possible respond. Responses must be submitted as soon as possible, but at the latest by the 5<sup>th</sup> October.

---

### **Wide Area 20 Mph Speed Limits**



Recently Mr Harvey of the Bromley Road Safety Consultative Panel has been promoting the idea of a 20 Mph speed limit across the whole borough, with the exception of a few "Priority roads". The Bromley Road Safety Panel incidentally is made up of members of the general public with no special knowledge of road safety or traffic engineering but with an interest in the subject. But it is recognised by the Council.

The following is a brief summary of what your editor wrote in response to his campaign - a fuller version can be seen on the BBRAG web site at:

[www.bromleytransport.org.uk/Twenty.htm](http://www.bromleytransport.org.uk/Twenty.htm)

20 mph zones have been shown to be successful in substantially reducing accident figures in London. However, such zones are usually implemented with a combination of other traffic engineering measures such as road closures, speed humps, road narrowing, entry treatments, improved signage, improved lighting and other measures. It is therefore difficult to separate out the effect of the speed limit change from other changes. Indeed Department for Transport guidelines require that such zones are generally "self enforcing" – in other words physical measures in addition to signs must be used to ensure compliance with the speed limit.

But the recent suggestions from Mr Harvey of the Bromley Road Safety Consultative Panel is for a 20 mph speed limit on all roads in the borough except "priority roads" – the latter apparently includes roads such as Mottingham Road, Bickley Park Road, etc. (some of them are "A" roads of course and part of the "TfL network" but others are not). To introduce a 20 mph speed limit on all other roads would not be realistic in my view as it would be unlikely to be complied with, and would in reality be difficult to enforce. In addition it would be very costly and would not likely be cost effective as a road safety measure.

There is no public evidence that introducing a lower speed limit by itself, or reducing the speed limit below what most drivers see as a sensible speed, has any beneficial effect on road accidents. To quote from DETR Circular 05/99 on 20 Mph Zones: "*Extreme caution should be exercised when considering making 20 mph limits using speed limit signs with no supporting speed reducing features. The weight of evidence points strongly to signed only 20 mph limits have little or no effect on traffic speeds*". But putting up the required signage – and the associated road engineering measures mentioned above, would be enormously expensive. Every side road running off the above mentioned road would require a 20 mph sign at enormous expense, and such signs would add to the existing street clutter significantly.

It would be better to spend this money on road safety measures that are known to be cost effective and on roads where accidents are known to happen.

There are certainly some streets or zones in Bromley that might benefit from a 20 mph speed limit, in conjunction with road engineering changes, but it is surely best to examine which are the most cost effective sites rather than spread money around without thought.

Incidentally one of the few London boroughs who have introduced proposals for a wide area 20 mph speed limit is Lewisham who have a penchant for road safety “gestures” driven by politicians who believe these are vote winning ideas – just look at the number of speed humps in that borough. But you should be reminded that Lewisham has a worse record than Bromley in reducing traffic accidents. Bromley has done much better because money has been spent more wisely and on more specific measures with a concentration of effort on known accident locations. Lewisham’s “wide area 20mph” policy is yet another example of the introduction of road safety policies by people who have little real knowledge of road safety issues.

Mr Harvey claims that “experience shows that motorists who drive safely within 30 mph areas do not reduce their speed much when 20 mph zones are introduced”. Clearly in that case many of them would be breaking the law as the typical average speed of traffic on 30 mph roads is much nearer 30 than 20.

I agree that motorists would be unlikely to change their behaviour much, but the result would be that many would be unconsciously breaking the law and be subject to fines of £60, which can be imposed by the use of the hand held laser cameras that Bromley police now have.

Mr Harvey has produced a leaflet that shows suggested road signs and it includes one which is a standard “30 mph speed limit” sign but with the wording “But 20 on all non-priority roads” underneath. I do not believe that this is an “approved sign”, ie. authorised under the Traffic Regulations, and hence would be illegal unless specifically approved by the Secretary of State, which would be unlikely.

This leaflet makes other claims about the success of such a scheme including the claim that in Graz serious injury accidents were reduced by 24% in the first year. Was this statistically significant in the sense that it could not have happened by chance variation? I doubt it. In any case, any traffic engineer could have advised Mr Harvey that the normal period used for determining the success of any traffic scheme is three years after versus three years before, because it is known that almost any changes to roads reduce the accident figures temporarily. A longer time is required to ensure that there is no distorting effect.

Interestingly Mr Harvey also gives some figures for Graz and Bromley (of similar populations) and compares the accident figures in 2006. Although the Graz 20 mph scheme was introduced 15 years ago, the accidents figures for “KSIs” are almost identical and Bromley has one third of the “slight” accidents. There is clearly no evidence that Graz has a better accident record and whereas Bromley is part of the major metropolitan area of London, Graz is an independent city with very different traffic and social problems.

Inappropriate speed limits, i.e. those that drivers see as unrealistic or unnecessary, simply cause traffic laws to be brought into disrepute. There is much more compliance with speed limits when drivers see them as suitable in all driving conditions for the road concerned.

Regrettably there has been an excessive focus on speed as the main factor in road accidents when recent figures from the Department for Transport show that it is simply not true. If you waste money on trying to reduce traffic speeds, when there are better ways to spend the cash to improve road safety, then you are doing a gross disservice to the community.

No road safety measures should be proposed without a proper cost/benefit analysis. At present, we do not even know what the cost of these proposed measures might be, and what complementary measures if any are to be used to enforce the speed limit reduction, but in my view these measures are likely to be very expensive, and not produce any significant benefits.

In summary, the proposals from Mr Harvey are of an amateur nature and are not well founded on established traffic engineering practice and road safety knowledge.

### **The Real World Is Different**

An interesting commentary on the wonders of 20 mph zones was given in a recent report by Bromley council on an existing 20 mph scheme in the Selby Road area. This includes kerb build-outs and other road engineering measures. Although measured traffic speeds are way over 20 mph in almost all the roads (85<sup>th</sup> percentile as high as 32 mph) it has reduced accident figures substantially according to provisional figures. However, the residents are not happy (83% not happy versus 12% happy). They particularly disliked the build-outs which restricted parking so some are going to be removed.

---

### **Pedestrianisation of Parliament Square**

Richard Evans wrote a letter to Local Transport Today (LTT) the magazine read by road traffic engineers complaining about the abandonment of plans to pedestrianise Parliament Square. This is what your editor wrote in response which LTT duly published (accompanied by some good photographs of the traffic congestion in Trafalgar Square):

*“Richard Evans objected to Boris Johnson's plans to part-pedestrianise Parliament Square in your recent edition. But we think it's a sensible move.*

*He argues that road traffic evaporates when road space is reduced (and clearly this was a move to reduce road space), but the exact opposite is the case. What actually happens is road traffic just goes more slowly so more people waste more time stuck in traffic jams, and the stationary traffic simply generates more air pollution. The effect of removing road space is well demonstrated in the recently published TfL Sixth Annual Monitoring Report on the congestion charge. Journey times for sample trips in the middle of the night have increased by 22% between 2004 and 2007 and TfL admit that reallocation of road space is one of the reasons why traffic congestion is back to where it was before the charge was introduced.*

*Trafalgar Square is one good example of the negative impact of such schemes. This has not only reduced road trip times significantly in that area of London, but roads entering the Square now have solid queues of traffic for most of the day when they did not before. As a pedestrian I regularly walk across the new paved area and all it has become is a wide expanse of pigeon shit which in wet weather is positively dangerous. In reality the pedestrianisation of Trafalgar Square has not helped pedestrians transiting the Square at all - but it simply provided more space for the former Mayor to lay on 'bread and circuses' type offerings to the populace.*

*In essence Mr Evans makes it clear that he would indeed like to reduce motorised traffic by dictat for the benefit of pedestrians and cyclists. But this is special pleading because in reality it is simply an attack on the motorist when there is no obvious benefit to pedestrians in such schemes.”*

### **Mayor's Comments**

This is what Boris Johnson had to say on the pedestrianisation of Parliament Square: “There is absolutely no sense in Londoners paying £18m from their already stretched transport budget to reduce capacity on London's roads. This scheme would have turned a green glade of heroes into a vast, blasted, chewing-gummed piazza”. As usual, he has an eloquent turn of phrase.

---

### **Clock House Permit Parking Scheme?**

Apparently a few local residents have complained about the level of parking in their streets in the roads opposite Beckenham Hospital and up towards Clock House Station to the west of Beckenham Road. So as usual the Council are proposing a permit parking zone.

BBRAG has already sent in objections as we do to all permit parking schemes. In our view roads are public property, paid for and maintained out of local and national taxes, and they should not be reserved for residents alone. Permit parking schemes are just a way to introduce more bureaucracy and to charge residents for no additional benefit – most of the charges simply go towards operating the scheme.

Note that these schemes never guarantee any space for residents to park and the main problem in this area is that these streets contain close-packed terrace houses with no off-street parking and often with multiple occupancy. The growth of car ownership alone would most likely be the cause of any parking problems, although your editor had no difficulty in finding several parking spaces in the proposed streets on a weekday around mid-day.

---

### **Crown Lane Traffic Scheme**

Councillor Colin Smith recently considered the question of the proposed Crown Lane traffic scheme. This was designed to stop the frequent traffic jams that occur in this road due to parking on one side of the road causing gridlock. The proposals were to redesign some of the parking under two different options, including removing some of it to an enlarged off street parking area.

Local residents and the public were consulted and generally seemed in favour, particularly of Option 2. BBRAG also supported Option 2. However, Councillor Bennett spoke at the meeting and said some residents had objected to these proposals because they would not be able to see their parked cars from their houses. Councillor Smith then suggested that the separate proposals for a permit parking scheme in the area might solve the problem so he decided to do nothing.

*(Editor: This decision seems perverse to say the least. With money available for this scheme and general support from the public consultation, plus a recommendation from council staff to proceed, it is odd that this proposal could be overturned on such whimsical grounds. Why should a permit parking scheme solve the problem? Most permit parking bays fill up with resident's cars so the problem will not be solved and it is resident's vehicles that mainly cause these obstructions at present. Even one or two parked cars on this stretch of road create obstructions for traffic. So it simply makes no sense to do nothing).*

---

### **News Snapshots**

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

+ Tim Parker has stepped down from the position of Chairman of the Board of Transport for London, although he will still be a director. It seems the position is such a political hot potato that Boris Johnson has decided to take it on himself.

+ The proposed Manchester Congestion Charge, and opposition to it, continues to get little coverage in the primarily London-based national press. A good web site to visit though is the MART (Manchester Against Road Tolls) web site at: [www.manchestertolltax.com](http://www.manchestertolltax.com). This area is one where the local authorities are being bribed with Government money under the Transport Innovation Fund to introduce road tolls, and as with other such schemes it is being promoted as to the solution to the transport problems of the area without any clear evidence to support that argument. Indeed the details of the scheme, particularly the economics, are sketchy to say the least but a public consultation is still being proceeded with.

+ An interesting letter in the FT pointed out that Paris does not suffer from the problem of road works because it built its streets with ducts to contain cables and pipes. Only Poundbury in the UK has apparently taken these elementary precautions to avoid continuous digging up of the road surface.

+ Mayor Boris Johnson reiterated his views on congestion charging to the London Assembly recently – he said “I have got absolutely no intention of introducing congestion charging into outer London”. However, he said there had turned out to be some difficulties in following through on his commitment to reinstate the tidal flow in the Blackwall Tunnel although he was still working on this issue.

+ Boris Johnson has also rejected the idea for cable car or ferry services to replace the proposed Thames Gateway bridge as suggested by the Green Party – no surprise there as it was always a pretty lunatic idea.

He has also rejected a “public transport only” or “no car” bridge because cars are so essential in outer London due to “dispersed land uses”.

+ Traffic penalties in 2007/2008 within London reached 6.1 million, a 2% rise over the previous year. The small increase is apparently due to a reduction in bus lane offences as people are more careful about accidentally straying into them and know where the cameras are, plus possibly a more flexible attitude taken by some boroughs and TfL on enforcement. For example in an interview given to LTT by John Mason of TfL he explained how taxis were no longer penalised for stopping on red routes temporarily at night. He even admitted that if you accidentally strayed into the congestion charge zone, then TfL would now accept a representation on that matter (but don't try that repeatedly he warned).

+ The total owed by embassies who have refused to pay the London Congestion Charge has now reached over £11 million. *(Editor: I wonder if TfL have counted this as "revenue" that they expect to collect? If so it would reinforce how uneconomic the scheme is).* Top country is the USA owing £2.5m, second is Russia with £1.5m and third is Japan on £1.5m. Quite rightly they all claim it is a tax and hence they are exempt.

### **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.

### **Contact Information**

This Newsletter is published by the Bromley Borough Roads Action Group (B.B.R.A.G.), PO Box 62, Chislehurst, Kent, BR7 5YB. All material contained herein is Copyright of B.B.R.A.G. and may only be reproduced with permission. Any opinions expressed herein are solely those of the author of the article or that of the Editor which do not necessarily represent the official policies of B.B.R.A.G.

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.

Where this Newsletter is supplied in electronic form (e.g. as a PDF file via email), then you are permitted to pass it on to up to 5 additional readers without charge. In the case of corporate members, the Newsletter may be copied or forwarded to all staff members.

If you would prefer to receive this Newsletter in electronic form (via email as a PDF document which can be read by the free Adobe Acrobat reader), then please contact the Editor on the above email address. Apart from saving B.B.R.A.G. significant costs in printing and postage, you will gain a number of advantages such as seeing the pictures and diagrams in colour. The Adobe Acrobat reader can be downloaded from <http://www.adobe.com/products/acrobat>