

## **RAC Foundation response to the Mayor's Draft Transport Strategy October 2017**

*The RAC Foundation is an independent charity that conducts, commissions and disseminates research relating to motoring and road use. We welcome the opportunity to comment on the Mayor's draft Transport Strategy and look forward to constructive engagement with the Mayor's office, the Greater London Authority and Transport for London.*

*We have not sought to offer comments on all aspects of the strategy, particularly where these fall outwith our area of expertise. Below we offer comments in relation to the issues as they arise chapter by chapter throughout the draft strategy. We would be happy to discuss and/or expand on any of our observations.*

### **Chapter 1. The challenge**

1.1 We recognise the importance of London to the national economy, and the scale of the challenge involved in accommodating significant population growth when many of London's transport networks – rail, underground and road, are already under huge pressure from an ever expanding 'peak' of demand morning and evening – for London the so-called 'rush-hour' has long been a thing of the past. Joined-up thinking about development of new housing that generates attractive homes and a population density that can readily be served by mass- transit public transport solutions must be right.

1.2 We welcome the Mayor's focus on promoting road safety in the context of promoting London as a healthy city more generally. Roads are necessarily shared spaces and need to be designed and managed in ways that promote their safe use by motor transport, cyclists and pedestrians. In many ways the draft Strategy presents a bold vision with clear signals about the lifestyles that London could accommodate in future – distinctly more active and distinctly less car-borne than many Londoners experience today.

1.3 Our first and main concern is that the reduction of car journeys from 9.6m/day to 6.4m/day by 2041 in the face of 1.8m more people, 1.2m more jobs and a 20% increase in travel demand - and to reduce road traffic overall by 6 million vkms/day – looks like a mighty challenge by itself. The risk is that the measures to promote alternatives to motor transport and more efficient freight movement are either insufficient or insufficiently *swift* in impact to counter the otherwise inevitable increase in road congestion, with consequent negative implications, including, on road for bus patronage. More carriageway space is destined to be re-purposed for walking and cycling, and nothing is evident in the strategy, beyond the Silvertown tunnel, to add capacity or tackle inefficient road junctions.

1.4 Admittedly there has been a trend away from car use in London with a reduction from 49% to 36% of journeys between 1995 and 2015. Yet this has meant only a 7% fall in driver and passenger car journeys per day between 1995 and 2015, while the numbers of cars in London has actually increased by 16% from 1997-2015. Of course, it should be noted that trends in car use have significant spatial variation across London. The question must be whether the decline in car use can realistically be accelerated still further without adverse economic impact.

1.5 Based on Department for Transport data, a one third reduction in London's car traffic below its 2015 level in the face of a 21% growth in population would mean a 45% reduction in the use of cars by the average Londoner. If the increase in non- car journeys were spread evenly between walking cycling, buses and trains this would result in an additional 1.5m rail journeys, 1.4m Underground/DLR journeys, 2m bus journeys and 3.6m walk/cycle journeys a day. To put this into perspective the number of *additional* bus journeys would be equivalent to current bus usage in Greater Manchester, the West Midlands, Merseyside, and South Yorkshire put together.

1.6 Second, the challenge as expressed and many of the initiatives in the strategy are light on the importance of commercial activity to the economic health of London, and, in turn, the extent to which that activity is road-based. Business-to-business traffic is important not just for London's vibrant retail outlets but for the service economy, entertainment and catering, and for trades service commercial and domestic customers. The aspiration to achieve reductions in the volume and impact of road-based freight movement is clear, but the measures and the trajectory they might achieve are rather less so.

1.7 Although the challenge as expressed differentiates between central, inner and outer London, we wonder whether the measures in the strategy sufficiently recognise the different transport requirements generated by the lower-population-density nature of the outer London boroughs, in terms of residential development, where the public transport tends to be sparser than in the centre.

1.8 Lastly, to at least the same extent as other conurbations, if not more so, we would argue that part of London's road challenge is generated by the need for highway maintenance (a smooth carriageway is more an issue for cyclists than for the average motorist) and the disruptive effects of utility streetworks. London has led the way in improved techniques, planning and co-ordination, but the presence of essential services below the carriageway needing replacement and renewal is disproportionately disruptive when the network is already over-stretched. In a similar vein, London is also challenged by the volume of construction projects (including public transport projects) with associated need to manage the delivery of materials and the disposal of spoil.

## **Chapter 2. The vision**

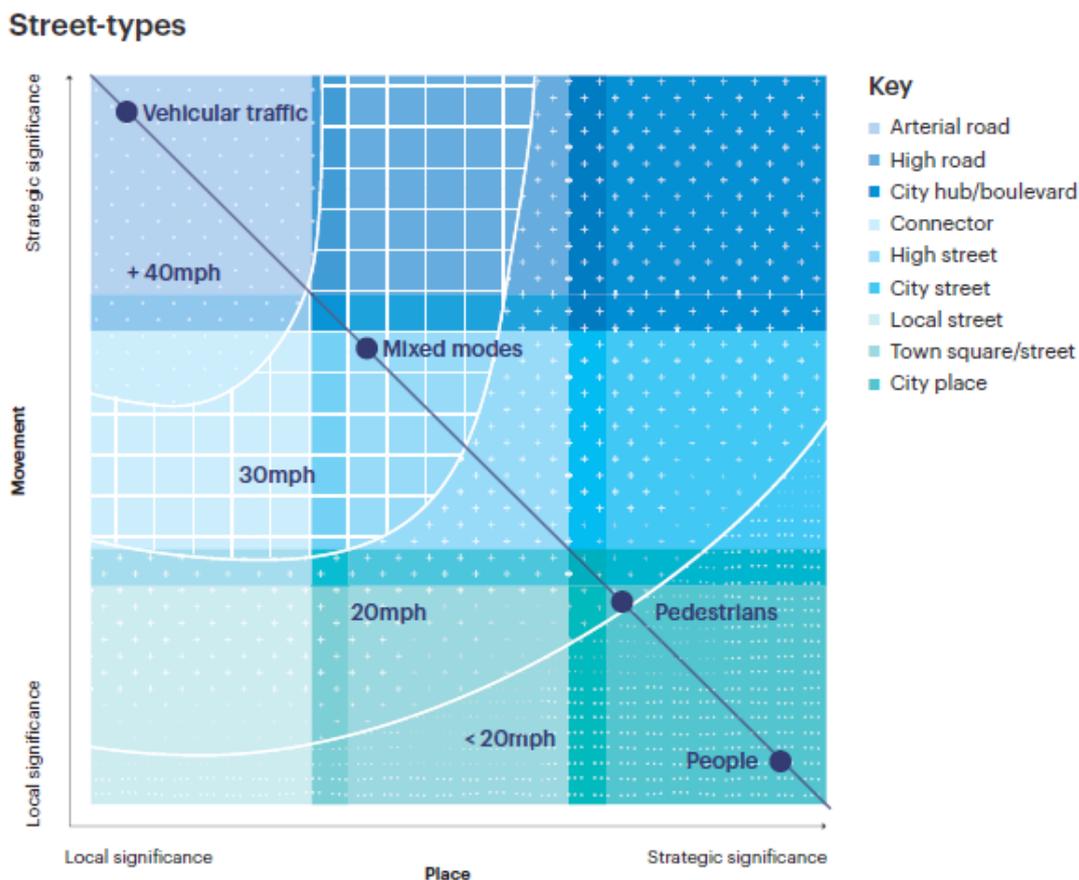
2.1 The Mayor's vision is clearly ambitious – it puts public health and the quality of urban realm up in lights, and both are rightly high priorities for a world city with London's heritage not to mention its burgeoning population. We also commend the recognition of the needs of disabled Londoners.

2.2 Identifying and co-ordinating the locations for future growth and the potential for serving that growth through existing and potential transport schemes makes huge sense, and on the theme of co-ordination and co-operation we know that the vast majority of London's roads are a borough responsibility and that effective working with Highways England matters, recognising the fact that London is served by national networks, both for access to the capital and for radial trips in outer London.

2.3 Our main concern with the vision, though, is the pre-eminence it gives to the 'Healthy Streets' approach and the adoption of the Lucy Sanders indicators, not because we disagree with

them, but because they appear without any corresponding recognition of previous London-led work on classifying street types. None of the ten Healthy Streets indicators is a measure of the capability of the street to act as an efficient thoroughfare, and efficient thoroughfares are surely a prerequisite for London’s success economically and as a great place to live, where Londoners have access to an incredibly wide range of employment opportunities and employers have a large, skilled and diverse labour pool to draw from.

2.4 We would strongly advocate the revisiting of the classification of street types developed by the London Roads Task Force, which recognises the multiple purposes a street may serve:



2.5 The nine-box grid is not a hierarchy. Nor is it a rigid classification system. Rather it admits of the inevitable trade-offs that have to be made where specific stretches of road may serve multiple purposes – the A23 outside Brixton underground station would be an example of the difficult balance Transport for London has to strike when managing a road that is an important distributor, a bus corridor, and accommodates high volumes of pedestrian traffic accessing the tube station and the shops nearby.

### Chapter 3. Healthy streets and healthy people

3.1 The benefits of active travel are well-recognised and it is no surprise to see the Mayor advocating active travel as part of his health agenda. We also strongly support the strategy’s focus on promoting improved road safety.

3.2 With so much of the strategy riding on ‘demand management’ we would, though, observe that we are interested in, and would be happy to engage in debate on, what form the ‘next generation of road user charging’ might take. Beyond the range of environmental charges that the Mayor is introducing through the ‘T’ charge and the Ultra-Low Emission Zone (ULEZ) it is unclear, from the strategy, what form of solution might be in play, despite the fact that the scale of mode shift the draft Strategy envisages suggests a significantly expanded and enhanced approach as a prerequisite to pre-empt widespread congestion, in the absence of multiple borough-level initiatives.

3.3 On the vehicle emissions front, we strongly support the cleaning of the bus fleet – bigger, heavier diesel-engined vehicles that are used intensively day and night throughout London are an obvious and logical place to start for the full range of retrofit, ultra-low and zero-emission technologies. We have responded separately on the Mayor’s proposals for acceleration of the ULEZ, which we think would come with significant consequences for the operators of heavy vehicles, particularly when set alongside the timing of other Mayoral initiatives such as the Direct Vision Standard. As ever, pace needs to be tempered by the capacity of the market and the supply chain to respond to the incentives being put in place.

3.4 We have recently published a report looking at the steps that might be taken by national government, using the powers we understand will be sought in the Electric and Autonomous Vehicles Bill, to encourage the take-up of zero tailpipe-emission vehicles, with many of the points equally applicable to London e.g. the availability of public chargepoints, confusion over connections and charging tariffs, and the desirability of ensuring chargepoints are installed at new residential developments<sup>1</sup>.

3.5 We welcome the Mayor’s initiatives to ensure the physical resilience of transport infrastructure (but would set this alongside the practical resilience, in reducing the incidence of disruption and post-incident recovery times).

3.6 Whilst noting the reference to powered two-wheelers in respect of small/lightweight freight deliveries, we would encourage the Mayor to think about the extent to which these vehicles – be they battery-boosted bicycles, scooters or motorcycles – can provide a congestion-busting halfway house for those for whom cycling is not a realistic option, on health grounds, or because of the need to carry shopping etc... A cursory glance at the motorcycle parking bays in central London reveals a mass of relatively small-engined, high mpg machines whose emissions impacts, even with current technology, will be far lower than their four-wheeled equivalents.

3.7 Lastly, on scrappage, we have undertaken detailed calculations nationally and for London which illustrate that this is likely to be a high-cost option offering relatively low air quality benefits which we are sharing with officers in the GLA and at TfL. As a matter of social policy the Mayor might still wish to develop some options that would assist the low-income households who could otherwise be financially disadvantaged by an expanded ULEZ, or by further developments of the ULEZ concept to cover a wider area at a still higher cost of entry. But doing so in a way that will preserve household mobility is going to be far from straightforward.

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[http://www.racfoundation.org/assets/rac\\_foundation/content/downloadables/Ultra\\_Low\\_Emission\\_Vehicle\\_Infrastructure\\_Harold\\_Dermott\\_September\\_2017.pdf](http://www.racfoundation.org/assets/rac_foundation/content/downloadables/Ultra_Low_Emission_Vehicle_Infrastructure_Harold_Dermott_September_2017.pdf)

## **Chapter 5. New homes and jobs**

5.1 As noted above, we welcome initiatives to link large-scale housing provision with joined-up thinking about transport connectivity. A point to watch on tightening parking standards for new developments is the real-world fact that the absence of a dedicated off-road parking space is not, of itself, going to persuade every resident to abandon car ownership, an issue faced already in many central and inner London areas with residents-only on-street parking schemes.

5.2 We support the Government's plans for a new Lower Thames Crossing and the Mayor's commitment to the Silvertown crossing. We would, though, argue that it would be unwise to wait to establish the post-opening impact of Silvertown before even starting to consider the case and the options for implementing further schemes that would better stitch together the north and south of London across the Thames, particularly to the east, through the Docklands corridor.

## **Chapter 6. Delivering the vision**

6.1 It is a little surprising that technology doesn't feature more prominently in the strategy, though it is likely that this is a product of the absence from the strategy of measures to improve motor-traffic flow other than through demand management. Advanced signalling has long been a feature of London's road-traffic management toolbox, and further advances, in self-learning technology, data generation and data sharing could potentially offer benefits that might otherwise be missed.

6.2 Transport for London is often, rightly, held up as an exemplar for its approach to making travel data 'open', but data on road and traffic lags considerably behind that for tube and rail, both in depth and the degree of openness.

6.3 Lastly, we welcomed the Government's commitment to create a Roads Fund from Vehicle Excise Duty income and noted that a share of VED is scheduled to go to the devolved administrations in Scotland and Wales to fund their strategic roads. On creation of the GLA and TfL, London's strategic roads were transferred to TfL (rather than ending up with the Highways Agency). We would agree that there is a strong case for TfL receiving a share of VED income, through, or in association with, the Roads Fund, but on three conditions:

- The Mayor's transport strategy would have to recognise explicitly the role of those strategic roads as distributors for motor traffic;
- There should be a commitment to review whether the TfL network has the right coverage; but
- There should not be any move to give TfL local powers to set VED levels, which would potentially add confusion back into a system not long-since simplified by the Treasury.

**RAC Foundation**

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