

This response has been written by Nicholas Lyes, RAC Public Affairs Manager, on behalf of RAC Motoring Services

About the RAC

With more than eight million members, the RAC is the oldest and one of the UK's most progressive motoring organisations, providing services for both private and business motorists. As such, it is committed to making driving easier, safer, more affordable and more enjoyable for all road users.

The RAC, which employs more than 1,500 patrols, provides roadside assistance across the entire UK road network and as a result has significant insight into how the country's road networks are managed and maintained.

The RAC is separate from the RAC Foundation which is a transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and their users.

The RAC website can be found at www.rac.co.uk.

In September 2016, the RAC published its latest [Report on Motoring](#).

RAC Response

Chapter 1

- 1. London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.**

Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.

- The RAC welcome the strategy as a genuine and constructive attempt to address the future transport needs of the capital.
- The RAC agrees with many of the policies and proposals included in the strategy. Our members want clean air, good health, and end to traffic congestion as a part of daily life and they recognise that “doing nothing” is not an option. They walk, cycle and use public transport and most see the car as addressing only part of their transport needs. Never the less, many still have a level of dependence on their cars to go about their daily lives.
- Transport strategy needs to address requirements defined by economic, social/mobility, housing, environmental and health needs of London. There are some areas of this transport strategy that would more logically form part of these other strategies – particularly a health and wellbeing strategy. It is appropriate for the Mayor to encourage a healthy lifestyle and the transport strategy needs to facilitate this but citizens should walk and cycle because they want to and not because the alternatives no longer exist!
- Views on the detailed proposals set down below but our over-arching areas of concern are:

- In order to persuade people to use their cars less, it is necessary to offer alternatives that are practical and affordable. There is an immediate need to address poor air quality in the most polluted areas of central London but alternative modes of transport with sufficient capacity need to be in place before punitive measures are imposed to discourage car use
- The policy does not adequately differentiate between car use and car ownership. The measures set down in this strategy are intended to offer alternatives to the car for those travelling within London and if successful they will reduce car use. However, this strategy will not reduce car dependence for journeys between London and other parts of the UK many of which are poorly served by public transport. Many of those living inside greater London will continue to require a car for these journeys, even though they will walk, cycle or use public transport within the Capital. Measures designed to discourage car ownership may discourage people from wanting to live in London which will ultimately have dis-benefits for London's economy.
- We should like to see more evidence that the measures proposed in this strategy will deliver the predicted levels of modal shift within the timescales forecast.
- The Mayor's decision to look at alternative forms of charging are welcome as ultimately it shifts towards a fairer 'pay as you use' method. There will be challenges associated with this, which we will discuss later in the response.
- Projected population growth means that pressure on public transport will increase. The document notes that even with London's current population levels, there is severe pressure on public transport. Therefore the Mayor must also see road use, specifically drivers as part of the solution, rather than part of the problem.

Chapter 2

- 2. The Mayor's vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80 per cent of Londoners' trips will be made on foot, by cycle or using public transport.**

– To what extent do you support or oppose this proposed vision and its central aim?

- The target is aspirational and ambitious but we question whether the evidence exists to support the predicted levels of modal shift. Experience of achieving modal change suggests this may be achievable in city/town centres but far more difficult to achieve in outer London areas.
- There will remain certain types of journey that can only be undertaken by car and this needs to be recognised in the strategy.
- RAC research from the 2016 Report on Motoring found that in London, 61% of drivers said that would find it very difficult to adjust their life to being without a car.

- Car ownership models may change but those living in London will still want access to a vehicle for journeys to and from destinations outside London that are not adequately served by public transport

3. To support this vision, the strategy proposes to pursue the following further aims:

- by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day – This is not a transport objective and belongs in a health strategy
- for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041 – The RAC agrees
- for all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London's entire transport system to be zero emission by 2050- Targets for buses are insufficiently ambitious and need to be more stretching.
- by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public - Without understanding all of the modelling and underlying assumptions, we are not sure whether this target is either desirable or deliverable
- to open Crossrail 2 by 2033 – The decision on whether to proceed on Crossrail 2 should be based on the business case and the return on investment compared with other transport investment options (e.g. extension of or increasing the capacity of the tube network)
- to create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor - The RAC has no views on whether suburban rail services should be devolved to the Mayor.
- to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared with the full network – Whilst the objective is desirable, we have no views on achievability
- to apply the principles of good growth – We have some concerns about some of these – see specific comments later in this response

– To what extent do you agree or disagree with the aims set out in this chapter? – See above

On the specific aims raised:

- **for no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041**
 - These are clearly worthwhile objectives.
 - The objective for buses may be deliverable but will be greatly assisted by the fitting of Automatic Emergency Braking to all buses. The Mayor should be leading on this.
 - It will be far more challenging to deliver the objective for all road collisions. For example, Can serious collisions involving vehicles used for criminal activities, drivers

under the influence of drink and drugs for example be completely eliminated? The objective may be achievable when fully autonomous vehicles dominate but this is unlikely by 2041.

- **for all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London's entire transport system to be zero emission by 2050**
 - The target for buses is insufficiently ambitious. Buses are a major source of Nitrogen Dioxide emissions and there are many of them doing large mileages on a daily basis.
 - Delivery of the targets for all road vehicles are highly dependent on having the infrastructure in place to support this aspiration. Can London afford, for example to ensure that all residential streets have adequate on-street charging facilities where off-street parking is not available?
 - Might it be preferable to set a more achievable goal in terms of the entire transport system (road vehicles and trains but presumably not aircraft over-flying London) being populated by only zero emissions and ULEVs after 2037?
 - The Mayor must also work with the Government to unlock funding into major charging/alternative fuelling infrastructure.

- **by 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public**
 - Reductions in traffic volume are a consequence of other policies. London's economic, social/mobility and environmental needs must be effectively addressed and the traffic volumes will only reduce if these needs can be addressed by alternatives to road transport. It is not clear that the measures in this strategy are capable of delivering this level of vehicle km/day reduction.
 - Traffic levels in much of central London have been falling for some years, but congestion has worsened and this has contributed to poor air quality. It is therefore important that the Mayor's plans address all aspects of congestion reduction, i.e. better road layout and traffic management alongside efforts to reduce traffic volumes.

4) Policy 1 and proposals 1-8 set out the Mayor's draft plans for improving walking and cycling environments.

– To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling? Please also describe any other measures you think should be included.

- The RAC welcomes measures that will make walking and cycling more attractive and safer. We recognise that segregation, by means of dedicated cycle highways is the safest option.
- We also welcome proposals to engage with schools, employers etc. to promote cycling and walking.
- This needs to be balanced alongside the needs of other road users. It does not make sense, for example, to reduce the road space available to other road users in order to create more cycle highways if this has the consequence of materially extending journey times for buses. Routes must also be carefully selected for segregation. Car journeys will not reduce solely as a consequence of reducing the road space available. If congestion increases on these routes, there is a risk that air quality will deteriorate further resulting in all road users, including pedestrians and cyclists, being exposed to poorer quality air.
- The strategy states that many trips that people make by car will switch to buses when cycling or walking is not an option. However, there are many journeys made by car where the bus is not an alternative. This is particularly the case for the disabled, the elderly, for young families and for journeys where bus routes simply do not offer a practical alternative.

5) Policy 2 and proposals 9-11 set out the Mayor's draft plans to reduce road danger and improve personal safety and security.

– To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security? Please also describe any other measures you think should be included.

- We note the proposal to reduce speed limits to 20 mph. RAC supports the use of 20 mph limits in high risk areas such as schools and hospitals and in residential areas where residents support this. However, we do not support the imposition of 20 mph speed limits on busy through routes where compliance is generally poor and there are direct consequences associated with a loss of productivity for businesses and unnecessary extension of journey times for individuals.
- We support the use of devices to encourage speed compliance in 20 mph zones. However, we have a strong preference for speed cushions and chicanes as compared to speed humps because the latter encourages repeated acceleration and deceleration which maximises emissions and speed humps are difficult for cyclists to

navigate around and uncomfortable for bus passengers and can also delay emergency vehicles.

- We support all of the other measures in proposals 9 -11, and we are especially supportive of plans to work with schools to promote safe, responsible cycling and walking.

6) Policy 3 and proposals 12-14 set out the Mayor's draft plans to ensure that crime and the fear of crime remain low on London's streets and transport system.

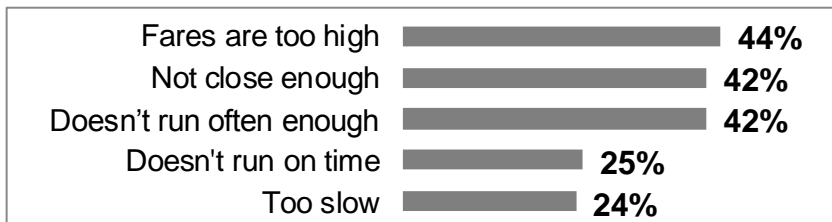
– To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London's streets and transport system? Please also describe any other measures you think should be included.

- The RAC fully supports this policy and the proposals included in proposals 12-14. RAC has actively campaigned to halt the reduction in numbers of dedicated roads policing officers across England and Wales.
- We support a more consistent approach to the use of bus lanes. We believe that there is a case for granting access to bus lanes to certified breakdown vehicles to enable them to more quickly access the scene of an incident (breakdown or accident) in order to speed up clear-up times. Incidents of this type cause congestion with consequential impacts on vehicle emissions and journey times for buses commercial vehicles and other road users.

7) Policy 4 and proposals 15-17 set out the Mayor's draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight.

– To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets? Please also describe any other measures you think should be included.

- We are supportive of proposals 15 and 16 though we do not underestimate the degree of difficulty in achieving the objectives set down in Proposal 15 given the number and diverse interests of the various stakeholder groups involved
- Our research for the RAC Report on Motoring suggests that 57% would use their car less if public transport were better and a similar percentage think that a majority of people in cars could use public transport instead. When asked why they don't use public transport they responded:



- Whilst we do not doubt that it is possible to reduce the number of car journeys, substantially better public transport, particularly more and cheaper buses that better serve the outer suburbs, will be required to reduce car dependence.
- Proposal 17 which encourages car clubs is admirable, but much of this will depend on how London residents use their vehicles. If they use their vehicle frequently for work purposes and for a journey of several miles, a car club must be more financially attractive than ownership. Car clubs are far more suitable for occasional car use where the primary/daily mode of travel is via public transport.

8) Proposals 18 and 19 set out the Mayor's proposed approach to road user charging.

– To what extent do you agree or disagree with this proposed approach to road user charges? Please also describe any other measures you think should be included.

- We welcome plans to monitor the effectiveness of the Congestion Charge. Arguably, if motorists are paying a 'congestion charge' and being delayed by congested roads, then this may say something more about road design, layout and road space. Therefore this should be part of any plans to monitor impact.
- The RAC is not fundamentally opposed to road charges where these replace rather than supplement existing charges and our research suggests that a majority of motorists share this view.
- In principle there are benefits in moving from fixed daily congestion and emissions related charges to a road charge that reflects the extent to which a vehicle is contributing to the problems of congestion and poor air quality. Thus, a high emissions vehicle travelling lots of miles should pay more than a low emissions vehicle that accesses a charging zone briefly. A road charge is therefore both fairer and better incentivises responsible behaviour.
- Provided the introduction of a road charge in London is as a replacement for the Congestion and Clean Air Zone charges and the levels of charge are seen as fair and not punitive, we believe that motorists would not be opposed to the change.
- When considering the feasibility of such charges, it is essential that the Mayor and his team recognise the need for enabling technology that can be standardised across the UK so that any similar road charging schemes elsewhere in the UK are based on a common technology platform and motorists are not faced with different non-compatible platforms when

travelling around the UK. We would be pleased to work with TfL to look at the viability of a new road charging regime.

9) Proposals 20 and 21 set out the Mayor's proposed approach to localised traffic reduction strategies.

– To what extent do you agree or disagree with this approach? Please also describe any other measures you think should be included.

- Whilst the majority of local authorities act responsibly taking account of the best interests of the local residential and business communities, the RAC has concerns about the small minority that may not act objectively in formulating actions to manage demand.
- By way of illustration, a small number of local authorities have introduced substantial surcharges on the cost of residential parking permits for diesel cars taking no account of the age of the vehicle or how much they are driven and therefore how much they are contributing to poor air quality. A similarly misguided approach to other forms of demand management could be hugely damaging to the economic well-being of local high streets and to personal mobility of local residents.
- We would welcome greater clarity on the content of 'local implementation plans' and the associated consultation processes

10) Policies 5 and 6 and proposals 22-40 set out the Mayor's draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city.

– To what extent do you agree or disagree that these plans would help London become a zero carbon city? Please also describe any other measures you think should be included.

- The RAC fully supports measures aimed at reducing emissions from existing vehicles and encouraging the faster take-up of zero and ultra-low emissions vehicles
- The RAC supports the introduction of the central London ULEZ though it is essential the businesses and individuals have time to adapt, bearing in mind that successive governments have encouraged the take-up of small fuel-efficient diesel cars through the taxation system in order to help meet the UK's greenhouse gas emissions reduction targets. We still believe that with the introduction of the t-charge in October 2017, the introduction of the ULEZ should be introduced in 2020 as originally proposed. We also question whether older taxis, which do substantial daily mileages in the areas of poorest air quality, should receive an exemption from the charge.
- The RAC supports Proposals 23, 24 and 25. The RAC would like to see greater emphasis placed on "no idling" zones. Local authorities already have the powers to enforce "no idling" policies but few appear to do so. We regard this as a "quick win" particularly in areas close to schools and in air quality hot spots.

- We support proposal 26. We are particularly concerned that the VED rates introduced earlier this year for new vehicles have removed part of the incentives to purchase plug-in hybrid vehicles. PHEVs are only a partial step towards zero emissions but today offer a practical alternative for a majority of motorists during the period when affordable pure electric vehicles still do not have sufficient range for most motorists and the charging infrastructure is still immature and inadequate. We would encourage the Mayor to lobby Government to encourage changes to the VED system – The RAC published research in March 2017 highlighting that the new VED structure does not sufficiently incentivise drivers to switch to the newest plug-in hybrids¹.
- We regard Proposal 27 as lacking in ambition. Given the contribution that buses are making to poor air quality and the relatively low number of vehicles involved, we believe that it should be possible to achieve a zero emissions fleet before 2037. Prior to its licence being withdrawn, Uber had recently announced its London fleet would have been 100% hybrid and pure electric by 2019 and entirely zero emissions by 2025. We do, however, welcome TfL's policy of all new black cabs being pure electric from January 2018.
- A scrappage scheme would need to be carefully targeted. As the RAC Foundation's research has shown, a poorly targeted scrappage scheme could be very expensive to implement without necessarily delivering a worthwhile improvement air quality.
- We support proposals 28, 29, 30, 31, 32.
- The creation of larger zero emissions zones as envisaged in Proposal 33 needs to be evidence-based and needs to be fully consistent with the framework set down in the Government's latest air quality strategy. Air quality is essentially a local issue and whilst London's problems are more extreme than elsewhere in the UK, measures outside central London must be evidence-based and address genuine areas of poor air quality. Ultimately, all vehicles will become zero emissions but the transition must be managed responsibly and on a timescale that recognises the economic and social/mobility needs.
- We welcome the mayor's recognition of the contribution of brakes and tyres to particulate emissions. As diesel, and possible petrol particulate filters are effective at removing particulates from exhaust gases, brakes and tyres will become the primary target for further reduction of particulates and we therefore fully support the measures set down in proposal 34
- We fully support proposals 35, 36, 37, 38, 39 and 40

11) Policies 7 and 8 and proposals 41-47 set out the Mayor's draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration.

¹ <https://www.rac.co.uk/press-centre#/tag/vehicle-excise-duty>

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

- We are broadly supportive of the measures set down in proposals 41-47. We have commented earlier on our views on the choice of measures to encourage driving at appropriate speeds and the disadvantages of speed humps compared to alternatives.
- We welcome the recognition that driving style can contribute to safer, more environmentally friendly and quieter environment. We believe all stakeholders should be doing more to encourage adoption of more responsible driving styles by drivers of cars, motorcycles, light commercial vehicles, taxis and private hire vehicles.
- The Mayor no doubt recognises that repetitive acceleration and braking by vehicles is often a consequence of congestion and a source of air and noise pollution. Road design and the associated traffic management systems should therefore encourage smooth, safe traffic speeds.

Chapter 4

12) Policy 9 and proposal 48 set out the Mayor's draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling.

– To what extent do you agree or disagree that these plans would provide an attractive whole-journey experience? Please also describe any other measures you think should be included.

- Whilst we support improving the "Street environment" we believe that it is possible to improve the environment for all street users in many situations without necessarily requiring modal shift away from cars. This has been demonstrated in a number of implementations of Shared Space principles in London and across the UK.
- We have concerns about a lack of pragmatism in proposals to discourage parking and pick up/drop off at stations. Many of those living in outer London do not have public transport alternatives to reach a local station, nor is it practical for them to cycle or walk. If suitable parking or pick up/drop off facilities are not available, this will encourage them to use their cars for the whole journey rather than just to reach a train.

13) Policies 10 and 11 and proposals 49 and 50 set out the Mayor's draft plans to ensure public transport is affordable and to improve customer service.

– To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport? Please also describe any other measures you think should be included.

- Research for the RAC Report on Motoring cited earlier in this response emphasised the need for affordable high quality public transport to achieve modal shift away from car use.

- RAC therefore supports proposals 49 and 50 but stresses that we have no views on the devolution of rail to London which we regard as a political matter and therefore not one on which it is appropriate for the RAC to have a view.

14) Policy 12 and proposals 51 and 52 set out the Mayor's draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan.

– To what extent do you agree or disagree that these plans would improve accessibility of the transport system? Please also describe any other measures you think should be included.

- We fully support these proposals

15) Policy 13 and proposals 53 and 54 set out the Mayor's draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed.

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

- We support Proposals 53 and 54 in principle but there has to be a balance struck between the need to ensure bus journeys are quick and reliable and the needs of other essential road users. The creation of dedicated bus lanes results in this road space having a relatively low vehicle occupancy which in turn puts greater pressure on the remaining road space. We have already seen something similar arising from the creation of dedicated cycle superhighways. We would prefer to see the designation of priority vehicle lanes which gives access to a greater range of priority vehicles.
- We also question the practicality of giving buses signal priority over other vehicles.

16) Policy 14 and proposals 55 to 67 set out the Mayor's draft plans to improve rail services by improving journey times and tackling crowding.

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

- The RAC recognises the need to increase rail capacity to support this strategy but has no views on individual proposals. Any investment in new capacity must be supported by a viable business case and deliver benefits sufficient to prioritise the proposal over alternative options.
- As stated earlier, the RAC has no views on proposal 61

17) Policies 15 to 18 and proposals 68 to 74 set out the Mayor's draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully-inclusive and well-connected public transport system. The Mayor's policy to support the growing night-time economy is also set out in this section.

– To what extent do you agree or disagree that these plans would deliver a well-connected public transport system? Please also describe any other measures you think should be included.

- The RAC supports Policy 15 and Proposals 68 and 69
- We also support Policy 16 and proposals to deliver a fully integrated transport infrastructure, not just within London but between London and other elements of the national transport infrastructure.
- We note however, that research for successive annual RAC Reports on Motoring has shown that respondents attach a lower priority to hugely expensive projects such as HS2 and a new runway at a London airport than to improvements in local rail services, local roads and cycling facilities.

Chapter 5 – New homes and jobs

18) Policy 19 and proposals 75 to 77 set out the Mayor's draft plans to ensure that new homes and jobs are delivered in line with

- We have serious concerns regarding proposals to restrict car parking in new developments as set down in Proposal 76. This proposal fails to recognise that cars will still be required for a high proportion of journeys between London and other parts of the UK poorly served by public transport. Restricting car parking spaces in new developments will also have serious implications on personal mobility (particularly for the elderly and disabled) and on-street parking. Car owners will inevitably seek on-road parking if there is no off-road car parking provision. However, we believe that requiring new developments to provide charging facilities with each parking space is a good way to encourage the switch to ultra-low emission vehicles.
- The Mayor's policies need to recognise the difference between car ownership and car usage. Many London residents already walk, cycle or use public transport exclusively when travelling around London but still need a car to travel to destinations outside London that are not served by public transport. It is unreasonable to discourage car ownership as a means of discouraging car modal shift within London and such a policy will cause great resentment. Modal shift will arise through offering attractive, practical and affordable alternatives to the car. Car clubs suit certain needs and lifestyles, but, for example somebody commuting from a zone 3 location for work in a zone 6 location poorly served by public transport is likely to want to own a car for daily use.

The transport principles of 'good growth' (see pages 193 to 200).

– To what extent do you agree or disagree that these plans would achieve this? Please also describe any other measures you think should be included.

The transport principles of 'good growth' are:

- Good access to public transport – We agree with this
- High-density, mixed-use developments – We don't disagree with this

- People choose to walk and cycle – We would prefer “people can cycle and walk if they so choose and the local environment makes it easy for them to do so”
- Car-free and car-lite places – This confuses the principles of car ownership and car usage. See response to previous question
- Inclusive, accessible design – We agree with this
- Carbon-free travel – We agree with this as a long term aim
- Efficient freight – We agree with this

19) Proposals 78 to 95 set out the Mayor’s draft plans to use transport to support and direct good growth, including delivering new rail links, extensions and new stations, improving existing public transport services, providing new river crossings, decking over roads and transport infrastructure and building homes on TfL land (see pages 202 to 246).

– To what extent do you agree or disagree that these plans would ensure that transport is used to support and direct good growth? Please also describe any other measures you think should be included.

- Proposal 78 requires boroughs and other stakeholders to demonstrate how plans will contribute to modal shift away from the car. Such a shift will only occur if the alternatives to the car are convenient, comfortable and affordable, much of which is outside the control of boroughs and other stakeholders. The requirement defined in proposal 78 is therefore likely to lead to ill-conceived and punitive policies which discourage car ownership and car usage without providing the alternative options that incentivising modal shift.
- We are unable to comment on the merits of the individual elements of proposals 79 – 87 but see them as sensible provided the individual business cases demonstrate sufficient benefit to justify the cost
- In proposal 88 we are unclear how the imposition of charges to use the Blackwell and Silvertown tunnels will deliver the forecast benefits. People use these tunnels because they have a need to travel or move goods between locations on either side of the Thames and the imposition of charges will not change this. The primary purpose of such charges will be seen by users as revenue generation and to pretend that the justification is otherwise is misleading.
- We support in principle to proposals 89-95 subject our reservations about some aspects of the good growth principles. We also question whether walking and cycling have a part to play in sustainable access to London’s airports except as a minor component of a multi-modal journey.
- If the Mayor wishes to consider alternative routes to the airport, he may wish to look at driverless pods as another option in the future, similar to the type that currently operate at Heathrow Airport but that could provide access from Central London.

20) Policy 20 and proposal 96 set out the Mayor's proposed position on the expansion of Heathrow Airport (see pages 248 to 249).

– To what extent do you agree or disagree with this position? Is there anything else that the Mayor should consider when finalising his position?

- The RAC has no view as to the appropriate location for extra runway capacity at London's airports but agrees that any such expansion must include appropriate provisions for surface transport, including access by road. We note that routes into and around Heathrow Airport, particularly the M25, are already some of the busiest and most congested in Europe.

Chapter 6

21) Policy 21 and proposals 97 to 101 set out the Mayor's proposed approach to responding to changing technology, including new transport services, such connected and autonomous vehicles (see pages 258 to 262).

– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

- The RAC is not opposed to Policy 21 or proposals 97 – 101. We must stress however that modal shift requires the provision of practical and affordable alternatives and measures such as limiting parking provisions should only be considered if practical and affordable alternatives to the car are already in place. Measures such as restricting parking will cause huge resentment and hardship if imposed before the alternatives are fully available.
- We feel that the road space comparison included in this section of the strategy is biased against car use and fails to recognise that, apart from during periods of peak travel, most buses run at well below their capacity and are relatively space-inefficient. In contrast both shared and private ownership car numbers reflect the demand at the time. Additionally, the comparison fails to recognise that car sharing, i.e. multiple passengers travelling to the same or adjacent destinations often "car share".

22) Policy 22 and proposal 102 set out the Mayor's proposed approach to ensuring that London's transport system is adequately and fairly funded to deliver the aims of the strategy (see pages 265 to 269).

– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

- The RAC has no views on the devolution of powers to the mayor, GLA or TfL and regard this as a political matter.

- In Proposal 102, we fully support (a) and we accept the need for sustained levels of funding such as those set down in (b). However, we are opposed the transfer of any part of VED revenues to London. The current Government has hypothecated VED to establish a Roads Fund to support development and maintenance of the Strategic and Major Roads networks. The transfer of part of this funding to London would leave an unacceptable shortfall in the Roads Fund. We should therefore prefer to see the Mayor make a separate case for additional funding to Central Government.
- The Mayor must also recognise that vehicle owners and users contribute substantial taxation revenues as fuel duty, VAT on fuel, IPT on insurance, congestion charges (and soon an Ultra-Low Emission Charge) so they are entitled to expect good quality journeys. TfL's mantra is 'every journey matters', and we wouldn't expect journeys by car users to be an exception to this.

23) Policies 23 and 24 and proposal 103 set out the proposed approach the boroughs will take to deliver the strategy locally, and the Mayor's approach to monitoring and reporting the outcomes of the strategy (see pages 275 to 283).

– To what extent do you agree or disagree with this proposed approach? Is there anything else that the Mayor should consider when finalising his approach?

- We accept the need for oversight and therefore are not opposed to Policies 23 & 24 and proposal 103. We see the primary role of the oversight process as ensuring that:
 - local proposals are evidence-based, that they recognise the local economic, mobility, environmental and housing needs of their local communities
 - they strike an appropriate balance between incentives/support and more punitive demand management measures.

24) Are there any other comments you would like to make on the draft Mayor's Transport Strategy?

No

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