

BMAP Consultation Response Birmingham Friends of the Earth

Questions for Organisations

From the perspective of your organisation, what do you feel are the most important issues affecting transport in Birmingham?

The economic trends forcing people to travel further and more often must be reversed as far as Birmingham's people and council have the power to do so. (See our comments regarding page 100 of the BMAP)

BMAP presents a vision statement (below) and 5 objectives for the future of transport in Birmingham (on page 4 of summary document and page 22 of full BMAP document). To what extent do you agree with the vision and what changes would make to it?

We agree with the vision, but can't see how it can be achieved without a focus on changing Birmingham's economic trends. (See our comments regarding page 100 and section A of the BMAP)

What changes to the transport system are required to support the economy and future growth of the city?

A move towards active transport and better support for the more vulnerable road users and a change in road design towards a prioritising of safety and efficient public transport and trialling of shared space designs. (See our comments regarding pages 49, 50, 55 and 67 of the BMAP).

How much does your organisation agree that to achieve change, people and organisations need to change their attitudes towards their transport use? (e.g. by making positive choices to use sustainable modes of transport)

Very much so, though we believe it works both ways – people aren't going to change their attitudes without the opportunities – ie. changes in carriageway design (If you build it, they will come). (See our comments regarding pages 49 and 50 of the BMAP)

In the view of your organisation, what needs to change to encourage people to use sustainable modes of transport (walking, cycling and public transport)? What would be the most effective carrots (i.e. incentives to use sustainable modes) and sticks (i.e. restrictions or charges on unsustainable modes)? What is an appropriate balance between these carrots and sticks?

We believe the best carrots to encourage more sustainable transport modes are to make Birmingham's transport network safer, healthier and more pleasant. The sticks have to be fair and the people of Birmingham must know that any restrictions and charges on unsustainable transport modes are clearly benefiting them when they decide to use the more sustainable modes. (See our comments regarding pages 95, 97, and 98 of the BMAP)

In addition to existing government and EU grants, how do you think that transport projects should be funded in the future and what do you see as the role of the private sector within that? In addition to existing government and EU grants, how do you think that transport projects should be funded in the future and what do you see as the role of the private sector within that?

Ideally, the banking sector would go back to functioning as it did at the turn of the last century, but as that is currently unrealistic, there are many alternatives which we feel Birmingham City Council has shied away from

embracing. These are some suggestions that Birmingham Friends of the Earth campaigners have suggested that we feel can be explored in more detail by BCC:

- Health budget – especially with the air quality angle.
- Borrowing
- Bus lane enforcement
- Workplace parking levy
- Ring fencing local revenue such as fines or charges.
- Community Levies.
- Low Emissions Zones and fines or charges around those.
- Money from Enterprise Zones – ring-fence the building rates.
- Serious lobbying in Westminster.
- Oppose HS2 and call for fund reallocation.
- Look for EU funding for regeneration.
- Credit Union involvement
- Bank of Birmingham

(See our comments regarding section E of the BMAP)

Is there anything else you would like to add to your response which has not been covered under the previous questions?

We feel that reducing the need for travel by encouraging localisation and economic independence is the key to achieving BMAP's objectives and vision, and this hasn't seen enough focus. (See our comments regarding section A and page 100 of the BMAP).

Comments in Response to Birmingham Mobility Action Plan

Section A - Setting the scene

This document is ambitious and encouragingly, the Birmingham Mobility Action Plan does lay out some excellent and innovative ideas for how our transportation might be transformed, and how to tackle the current and future travel demands. We are pleased to see that the Birmingham Mobility Action Plan recognises that "Above all they [the EU] recommend that future transport planning should be centred around people's lives."

Birmingham Friends of the Earth feel however, that reducing the need for travel should really be at the heart of a 21st century city's plans and that if there are going to be 4 million journeys in Birmingham in 2031, our city and planet is likely to be in a seriously bad way.

Birmingham certainly needs to reduce car use, increase accessibility, improve health, improve air quality and improve safety. But the fundamental and most obvious solution, of reducing the need for travel, is not sufficiently addressed in BMAP.

As any doctor knows, prevention of a problem is always better and cheaper. So we question why BMAP often looks solely to adapt to the predicted increase in future travel needs – even if it is in a more sustainable manner – rather than devoting more focus on trying to halt or reverse these trends.

Yes, when people need to move about the city, it should be much more healthy, easy and sustainable for them to do so. But we feel people should need to move around far less than they do now, therefore sensible transport plans should be alongside plans to encourage localisation and more economic independence. This is not about forcing people to stay at home, but rather about greater localisation and use of electronic working so that people don't travel because they have to but rather because they want to.

PG 26 – How can Birmingham learn from the rest of the world?

It is good to see BCC looking elsewhere for inspiration and we would encourage more similar research whenever looking for transport solutions in future. We understand that cities such as Lyon have provided inspiration for the BMAP. We would argue that as a regional city with a multi-modal approach to its integrated transport system it is a very good case study. However, it is not the only one, and cities such as Berlin, Munich and Amsterdam, as well as many other European cities should be looked at for inspiration.

Section B - Improving Strategic Connectivity – City Wide and across the Region

B2 – Modal Strategies and Priorities for Action

PG 37 – City and strategic rail network

Birmingham Friends of the Earth believe that more rail provision is needed and this should integrate with land use considerations and prioritise supporting the journeys of non motorists. We support the highest priority for those schemes that reinstate rail services within and between urban areas and support journeys, in which people can walk or cycle to the station. The number of people within walking or cycling distance of the station should be major criteria for funding.

We look forward to the implementation of these rail network proposals as soon as possible. These are not futuristic projects, but projects which should be ongoing regardless of the development of the Birmingham Mobility Action Plan.

PG 40 – Sprint Bus Rapid Transit (BRT) as the Network's backbone and CityLink services

The BRT and CityLink proposals seem a sensible strategic approach since Birmingham is fairly fortunate that its road corridors are quite wide and, we feel, currently poorly utilised. It would be best to build one Sprint line at a time – beginning with the corridor in most need of attention with regards to social need, congestion and pollution.

To make Sprint work, two things will need to happen; one is the re-allocation of road space, see comments below regarding pages 49 and 50 of the BMAP, and the other is greater regulation of bus services. Regulation will mean Birmingham City Council and other public sector bodies will be able to plan the routes it needs as opposed to leaving route provision to the uncertainties of the market. This means a permanent network can be provided along main routes with little alteration. This also avoids the problem of expensive infrastructure being put in and routes then changing.

PG 44 – The importance of Interchange and A new way to pay

We look forward to seeing the implementation of smarter interchanges and ways to pay in the city and there will again be examples from around the world to follow. What has been an issue in the past though, for similar ambitious and specific plans, is the co-operation with stakeholders, transport operators and technology

providers. There has to be a united vision between these parties and not unequal influences in terms of power. Rather than outsourcing designs to poor performing corporations, like Capita, at extortionate prices, it would be better to use existing local quality talent and smaller companies.

Furthermore, greater effort should be made to get all bus companies to sign up to any smartcard scheme, which should include a capped fare system like the Oyster card system in London. The system should also include local rail, which currently is not the case. Again greater oversight, powers or regulation over local rail would also help with this.

PG 46 – An emissions free network

The ideas for creating an emissions free network are encouragingly innovative and we would like to see some of these ideas trialled in a certain area/route/corridor as soon as is possible to generate some public support, and much the same goes for many of the ideas laid out in BMAP. The wireless charging of electric buses is particularly exciting.

PG 48 – Delivery and operation of the network

We welcome a closer working relationship between bus operators and a rethinking of services as long as these are clear and permanent. Clearly there has to be some stability in terms of Birmingham's demographic and geography for this network to be best value. As we have said above, greater regulation of bus services would help achieve this. A franchise system like in London would be a very good model to follow.

PG 49 – How can public transport priority be provided on Birmingham's roads?

Highway space should be seen as a scarce commodity, and the surfaces themselves should also be flexible and adjustable enough to welcome new travel trends and new technologies. The 'if you build it, they will come' theory still holds though and road designers should not look to simply accommodate for current travel patterns, but seek to push modal shift through design. Shared space design, which we are pleased to see in BMAP, needs to be the central focus for transport planners in Birmingham.

This example of shared space infrastructure in Poynton, Cheshire, is a great example of what can be achieved and should be the kind of blueprint for road design in Birmingham:

<http://www.sustrans.org.uk/our-services/what-we-do/route-design-and-construction/shared-space-busy-intersection-poynton>

However cutting corners in terms of cost on these sort of shared space developments – in a similar way to how we have seen in the past with 100 metre long cycle lanes and splashes of paint here and there – will likely make matters worse rather than better.



PG 50 - Highway Redesign

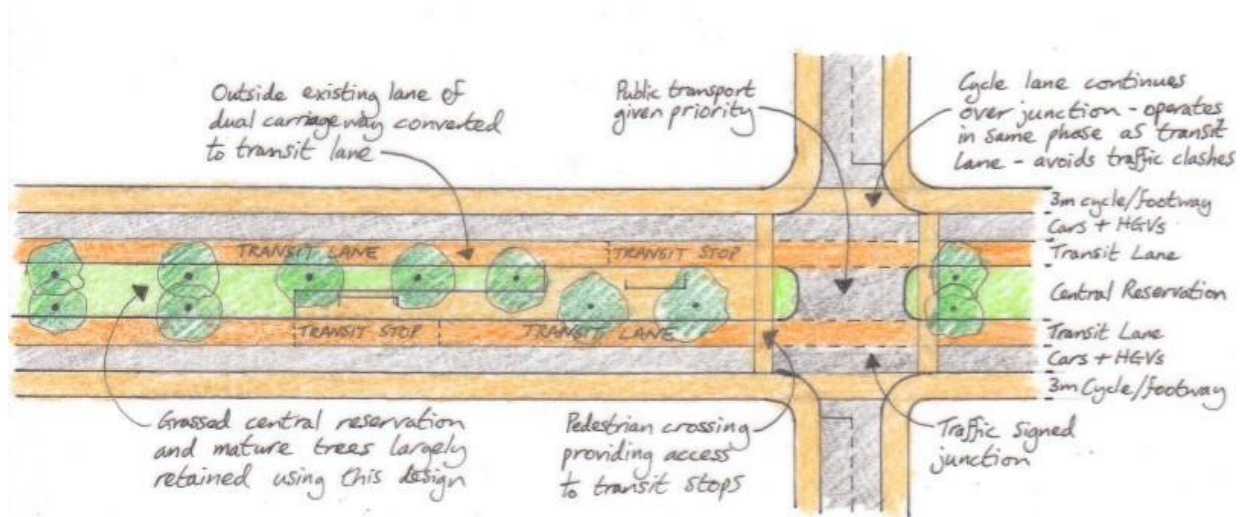
Urban Dual Carriageway

We welcome the proposals to reallocate road space for public transport. Indeed, it would be impossible to achieve the necessary level of switching from private car use to public transport use without this. Without a free flowing dedicated lane, priority at junctions and metro style transit stops that are at approximately 1km intervals, the new Sprint and CityLink services are not going to achieve metro levels of performance in terms of speed, frequency and reliability, and therefore would not be a viable proposition for those who currently drive. Road space reallocation of that proposed is an absolute must for these projects to succeed.

Whilst we do welcome this road space reallocation, we are worried about proposals to use the central reservation for rapid transit lanes where these are currently green space and planted with trees. We would request that this green space and trees are in the majority protected from being converted to hard surfacing. Roads that come to mind are Bristol Road, where the mature trees and green landscape contribute to green space for both people and wildlife, as well as to the historic character of the area.

Whilst we accept that in certain locations, such as major junctions, the transit lanes will need to 'take over' this central reservation (as illustrated in page 51 'Concept for High Priority Transit Route') we feel that for the vast majority of these routes, the second lane of the existing dual carriageway should be reallocated to the transit lane. This would both protect green central reservations, and result in a lower capital cost to provide the rapid transit routes, so the existing road construction and alignment would be maintained. Please find below a sketches of this layout.

Utilising the outside lane of the dual carriageway will mean that the rapid transit vehicles do not come into contact with side street and private driveway traffic turning on and off the main as much. However, it will mean that the transit stops will need to be on the central reservation, so zebra crossings over the road and transit lanes will need to be provided adjacent to each transit stop (zebra crossings being preferable as they result in better traffic flow over signal controlled crossings).



In addition, to suit the central reservation transit stops, the transit vehicles will need to be fitted with doors on both sides of the vehicle (as a tram or train) so that stops on either the left or right of the vehicle can be accommodated. This will give much more flexibility and require less road engineering works to make transit stops work with the existing highway and urban constraints.

It is good that recognition has been made of the risk that traffic may seek to use 'rat runs' on parallel inappropriate residential streets, so careful design will be needed to ensure these routes are unattractive to through drivers.

It is excellent to see that cycle lanes will be kept separate from the main carriageway. This should encourage cycling by creating safe (both actual and perceived safety) routes out of traffic. However, where segregated cycle lanes have been provided in the city in the past, it has tended to be the case that when the tough gets going, the cycle lane goes. This unfortunately is often at junctions where cyclists are thrust back in with traffic at the most dangerous section of road. This should not be repeated in future, rather adequate width should be allocated to allow segregated cycle lanes, taking space from general traffic if necessary, such as removing filter lanes.

On corridor routes cycle lanes should also be kept separate from pedestrians, as well as being segregated from the road, see the photos below on showing segregated cycle lanes in other cities.

Constrained Cross-Section Mass Transit Corridor

We are pleased that recognition of existing highway constraints has been thought about, including existing street trees. The retention of the existing highway width and street trees will ensure the cost effectiveness of the rapid transit systems without resorting to expensive and disruptive road widening that will unnecessarily increase road capacity and result in the loss of green verges and gardens. The use of tidal flow operation seems like a sensible one that allows the provision of a rapid transit lane when it is most needed. This would also be preferable over the skipping bus lane used on Alcester Road, as the rapid transit lane would be continuous.

Again, it is excellent to see that cycle lanes will be kept separate from the main carriageway, although we have the same concerns about areas of restricted highway width where other road users would be prioritised, as highlighted above. Pavements could be used where these are wide enough to be sectioned into a cycle lane and footpath, however as with Urban Dual Carriageways cycle lanes should be kept separate from

pedestrians, as well as being segregated from the road. Again, design and priority at all junctions for cyclists will need to be carefully considered.

Lower Priority Corridors

It is very good to see that a 2m wide separate cycle lane is proposed, rather than the poor quality 1m or less ones often currently deployed across the city. 2m is much more akin to those provided as standard in cycling cities such as Copenhagen and should be adopted as the standard in Birmingham.

However as with Urban priority corridors, we would request that some means of physical separation is provided to these cycle lanes due to them being part of the overall carriageway. The use of angled rubber blocks (such as those seen in Barcelona) would be a good option. The blocks are angled to prevent vehicles casually driving into the cycle lane, but allow very slow moving vehicles to drive round and park against the kerb (such as vans and trucks making deliveries, buses pulling into bus stops) and allow cars to drive through them when pulling onto and off private drives. By not being continuous they also allow water to reach existing gullies and can be easily straddled by road sweepers cleaning the gutter. They are also very cost effective, being simply bolted into the existing road surface.



In order to maintain grass verges where street parking is required, a plastic honeycomb material (shown in use below) could be used to reinforce grass verges so as to allow parking whilst not having to hard surface the verge. In district centres where there are shops and high pedestrian activity, segregated footways, cycle lanes and main carriageways should be dispensed with in favour of a full shard surface street with a 20mph speed limit.



Design & Implementation

The design proposals shown in this document are a vast improvement on the streets Birmingham currently has, but in order for these proposals to succeed they must be designed and implemented well. Unfortunately the local authority highways department has not historically proved itself to be especially good at this task, especially in relation to highway design for pedestrians and cyclists. As part of the implementation of these proposals, and indeed generally throughout the highway network, the highways department needs to undertake training so as to significantly raise its game in terms of designing for pedestrians, cyclists and public transport.

The Manual for Streets and Manual for Streets 2 should be the basis for all urban highway and street design, with best practice from places such as Ashford in Kent, Exhibition Road in London, and Poynton in Cheshire being followed, as well as good examples from the continent, such as from Denmark and The Netherlands. Advice and involvement from experts in this arena should also be utilised, such as the excellent Longbridge based Phil Jones of Phil Jones Associates, author of the Manual for Streets documents and designer of some of the country's best shared space streets, and urban pedestrian and cycle infrastructure.

PG 55 – Birmingham's Cycle Revolution – establishing cycling as a mass-participation mode of transport

We have responded in some detail recently regarding the Birmingham Cycle Revolution and though we are obviously excited about the £24 million investment, we already have concerns about its plans and implementation.

BMAP claims that 'Birmingham shares the Government's agenda for a transformational change in the level of cycling over the next ten years.' However, the question is where will the money to finish these plans come from after the next two years? Going by some of the decisions already made, such as the decision to allocate a quarter of this grant to canal towpath improvements which seems unlikely to significantly increase the modal share of cycling, we are not fully confident that BCC will not waste millions over the next two years.

Birmingham Friends of the Earth is running its own campaign, *Let's Get Moving*, in which we are calling for the council to set a target of 10% of journeys by bicycle by 2025 in Birmingham as well as to commit to an active travel investment fund of at least £10 per person per year (which was the advice of the All Party Parliamentary Cycling Group) for the next ten years in order to see a real step change in modal share. With funding unsecured for the Birmingham Cycle Revolution after 2 years, we worry that no transformational change will be seen.

Section C - Improving Connectivity and safety for Local Communities

C2 Initiatives and Priorities for action

PG 67 – Road Safety strategy and 20mph Strategy

We would again encourage BCC to look for examples from other cities before deciding on a grand safety strategy as it requires often quite complex solutions needing plentiful research. On the basis of how BMAP has been created, we would trust BCC to be thorough with ideas and design, but understand that there is a problem in communicating this to the teams and companies responsible for implementation. Also, Birmingham City Council should be lobbying for stricter liability laws to better protect the most vulnerable road users. A road user hierarchy which places the most vulnerable road users at the top should always be in force.

In terms of implementation, we are concerned that the 20mph limits taking up to 7 years means that in the meantime different roads will have various limits which will create uncertainty. This is important, as for us the big advantage of a blanket 20mph policy of limits is consistency and certainty. We understand that this is because of the cost of doing it any quicker. As the cost possibly already makes it more difficult to justify to certain members of the public, we would not want to add to this.

PG 69 – Local centre improvements and Walking and Cycling Strategies

It is our experience that many strategies which often at first seem counter-intuitive to road users, actually provide the best results for improving safety. The most important factor is often the physical infrastructure and environment itself and its ability to influence the mindset and attitudes of road users, as shown by the shared space example in Poynton. It is therefore encouraging to see ideas to raise road surfaces and reduce speed environments.

PG 72 – School Travel

There is certainly an urgent need in Birmingham to increase the number of school pupils travelling to school on foot or on bicycle for the many reasons BMAP outlines, and again we are encouraged that BCC is looking seriously into tackling this. We found that the overall levels of pupils cycling to school in Birmingham remained at 0.4% between 2007 and 2010. This compares to 1% across England. There is a lot of progress needed although projects like bikeability provide optimism.

One issue which hasn't been raised is the tendency – often encouraged by school administrators and head teachers – for teachers to live far away from their schools simply because of the fear that parents and teachers may encounter each other in the local community in potentially awkward situations (eg. the pub). This attitude is anathema to community spirit and again goes against the need to reduce travel. It is an example of a disconnected society and BCC should attempt reverse this trend wherever they have any power to do so, whilst lobbying national government to pursue its Big Society ideas.

PG 73 – Starting on the right foot for new communities

It is here that the Birmingham Mobility Action Plan and the Birmingham Development Plan have a basic contradiction – whilst the transport planners are enthusiastic about modal shift from cars to active transport and public transport, the development planners continue to focus on building Birmingham outwards on greenbelt land.

It is admitted that residential areas built on the city's outskirts will generate more car journeys and it is not true to say that every effort has been made to redevelop brownfield sites – that much is obvious to anyone living in Birmingham. We know that developers often cut corners in terms of making these new communities accessible and sustainable and that these Green Belt proposals are wholly motivated by short term financial gain. We would urge BCC to adhere to its statement that BMAP is based on social need and centred around people's lives and reserve Green Belt areas for their food growing potential and environmental importance.

PG 74 – Improving Community Access to Jobs and Services

We are encouraged that BCC are talking explicitly about deprived areas and IMD. However, we are not sure that the priority measures for the main corridors are the best way to benefit these areas. Most people can get into the city centre but getting anywhere else they need to go is the problem. We would like to see more of a

network linking up different areas rather than just feeding the centre, so perhaps new orbital links need to be developed and thought about more.

It is good to see a recognition of the financial barriers of transport. Improving access to leisure facilities is also key and the Big Birmingham Bikes scheme sounds like a good use of the cycle money provided it is administered properly. The reason something like Women on Wheels is successful is not just because the infrastructure and technical kit is provided but people's motivations, causes of behaviour and knowledge gaps are addressed as well. There is little point in simply buying a load of bikes if people are not empowered to use them.

Section D - Improving Connectivity to and Within the City Centre

D2 City Centre Transport Vision and Priorities For Action

PG 91 – Improve and Integrate the Public Transport Network

Whilst we welcome improved public transport in the city centre, the idea of Sprint services should be tempered with the understanding that the most vulnerable road users (pedestrians followed by cyclists) should come first. A serious effort in Birmingham to tackle the problem of emissions from taxi vehicles would be most welcome and overdue, and we would encourage any effort to make travelling by taxi more sustainable and, in the long term, less necessary.

PG 94 – Address Core and Quarters Connectivity

It is good to see recognition that Birmingham city centre must serve a diverse range of functions and must be connected accordingly. But because the city centre is so complex, we don't believe diagrams such as the one grouping land use and characteristics, taken from the big city plan are particularly useful. Consulting users of these areas about how they should be linked is probably the best way forward.

It should be remembered that most previous attempts at expansion and relocation have led to weakening in other areas of the core and to retail and office space voids, sometimes in the more historic streets that are better linked with the civic uses that give the city its strong identity.

The green wheel of towpaths and parks is a good plan to make the city more walkable and there is also some great aesthetic and historical value in these inner city areas, such as along the canals which could be made more of for the benefit of the city.

PG 95 – Provide and Promote a Range of Sustainable Transport Choices

Again, it is good to see BCC taking on board the shared space approach to urban design, moving away from physically restrictive infrastructure like the A38, middle ring road, underpasses and subways, so we reiterate the need for these plans and designs to be fully communicated to the implementation teams.

The hierarchy of road users has always been a problem and it is nice to see plans to change this. For this to be really effective though, we need to see lobbying, from city councils like Birmingham, of national government to change the law in civic cases and encourage compensation protection for the most vulnerable road users, as well as stronger enactment of existing legislation from police and council authorities.

A sliding scale of access approvals and urban and local freight consolidation centres are most certainly encouraging, these are plans which could solve many problems at once. This would obviously take a lot of administration, but it is more than likely that delivery companies in the region could be in favour as well. This could provide a great opportunity for partnerships with the council, as long as the council communicates and facilitates these projects well. These consolidation centres provide a great opportunity to reduce the amount of transport in the centre of Birmingham, as well as make freight delivery more sustainable.

More widely, there is a need for the council to communicate with and consult with all professional drivers, whether taxi drivers, delivery drivers or other, to use some carrot and stick motivation for them to get on board with many of the ambitious plans set out in BMAP.

With regards to the Queensway tunnels, we feel the council and transport planners should have more confidence that if design and implementation is good, road users will adapt, according to the 'if you build it, they will come/go' rule.

PG 97 – City Core Low Emission Zone

Poor air quality is a serious problem in Birmingham, costing our city at least £182 million per year and causing as many as 530 deaths a year. We feel that Birmingham should follow Oxford's example as soon as possible and set-up a Low Emission Zone.

We also feel that a Low Emission should not solely concentrate on the city centre, as the air pollution is not confined to that space, and a larger low emission zone should be looked at. Birmingham City Council must also work with neighbouring metropolitan authorities to actually make any improvements in air quality, and possibly look at a metropolitan-wide low emission zone.

What has been a problem in the past for such environmentally minded revenue-raising schemes, is that money has failed to be ring-fenced for use on the solutions side or has been wasted. If there is money to be raised from emission zones measures, that money must go towards the best sustainable and air pollution-reducing projects possible.

<http://www.birminghampost.co.uk/news/friends-earth-hits-out-birminghams-6524314>

PG 98 – Commuter Parking

We are in favour of a workplace parking levy. Again for the benefit to be realised, the money raised must be properly ring-fenced to fund alternative, sustainable transport modes.

PG 100 – Reducing the need to travel

Here, the council says that new developments and employers will be encouraged to adopt working from home, flexible working hours, maximise digital infrastructure, utilise 'hot-desks' in offices and reduce the number of car parking spaces. What is lacking though, is any methodology on how to actually implement these proposals, rather than just 'encourage' them. We really need to see contractors and employers signed up to more of these types of positive proposals aimed at reducing travel demands.

Whilst many of the measures set out in BMAP are admirable, they need to be enshrined in legally binding planning policy if they are to be implemented and therefore move Birmingham towards the sustainable and low carbon city it needs to be.

The council should be trying everything possible in both publicity and legal circles to: get local employers to favour local people for jobs; prevent the expansion of the cities limits; allow people to become as economically independent as possible (eg: with regards to food production) and to implement market trading developments in residential areas and not out-of-town or in highly centralised locations.

These steps would reduce congestion and pollution problems, keep economic wealth in local circulation and improve people's lives by reducing stress and wasted time – thereby increasing economic efficiency and productivity. Without recognising that these types of steps are needed, BCC will not be able to achieve the objectives of creating the most equitable, efficient, sustainable, healthy or attractive Birmingham possible.

Instead, what appears to be happening in Birmingham is that whilst the transport planners are enthusiastic about modal shift from cars to active and public transport, the development planners continue to focus on building Birmingham outwards on Green Belt land and expanding the airport – both of which increase travel demands significantly and worsen the city's problems as highlighted in this document.

E - Realising the Vision

In terms of securing funding for these proposals, we thought that there was a shortage of ideas in the BMAP. We feel that if Birmingham City Council are really passionate about these plans, they need to be more innovative and strive harder to find pots of money, so here are some more suggestions that Birmingham Friends of the Earth's campaigners would like to put forward:

- Health budget – especially with the air quality angle.
- Borrowing
- Bus lane enforcement
- Work place parking levy
- Ring fencing local revenue such as fines or charges.
- Community Levies.
- Low Emissions Zones and fines or charges around those.
- Money from Enterprise Zones – ring-fence the building rates.
- Serious lobbying in Westminster.
- Oppose HS2 and call for fund reallocation.
- Look for EU funding for regeneration.
- Credit Union involvement
- Bank of Birmingham

Conclusion

We hope these comments prove useful in the next stage of the development of the Birmingham Mobility Action Plan. We feel that overall the ideas contained in the Green Paper are good in so far as they go. Our main strategic problem with the document is that it does not sufficiently deal with reducing the need to travel, and the inherent contradiction with expanding the size of the city and providing a sustainable transport system. Greater thought and emphasis on these issues would improve this plan measurable.