London Assembly Transport Committee

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LONDON ASSEMBLY INVESTIGATION INTO TRAFFIC CONGESTION IN LONDON

Submission from Addison Lee

Executive summary

- London has the unenviable distinction of being the "*Gridlock Capital of Europe*" according to the world's largest traffic intelligence network, INRIX, with drivers spending 4 days annually stuck in traffic
- The number of Private Hire Vehicles (PHVs) on London's roads an important contributor to traffic which worsened by 10% throughout 2015. This is a major economic problem as the cost of congestion to the London economy was $8.5bn in 2013
- The number of PHVs entering the Congestion Charge zone has increased by over 50% from 2014 to 2016; London licensed PHVs numbers have increased from 60,000 in 2013 to over 100,000 in 2016
- Removing the Congestion Charge exemption for PHVs will not meaningfully reduce the number of PHVs on London's roads; but high regulatory standards for drivers will
- Addison Lee supports the introduction of ULEZ but without a network of fast charging stations for electric vehicles, it will be difficult for PHV fleets to transition to zero emissions compliant vehicles

Questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

An analysis of Addison Lee's dataset establishes that point to point Private Hre (PH) journey times increased by 10% throughout 2015 (based on a sample of over a million journeys completed in 2015 and compared to 2014 statistics)[1].

Addison Lee drivers consistently report that congestion continues to worsen, especially at peak times and as a result journeys times are increasing. This is in no small part explained by Transport for London (TfL) data which indicates that the number of Private Hire Vehicles (PHVs) entering the Congestion Charge zone has increased by over 50 per cent from 2014 to 2016[2].

Addison Lee provides vehicle movement data to the world's largest traffic intelligence network, INRIX. The 2015 Traffic Scorecard makes for uncomfortable reading. The report compared traffic in more than 100 metropolitan areas worldwide. London topped the list, with drivers wasting an average of 101 hours, or more than four days, in gridlock.

[1] London Journey Times Jump by 10% in a Year Says Addison Lee Research https://www.addisonlee.com/addlib/london-journey-times-jump-by-10-in-a-year-says-addison-lee-research/
[2] TfL proposals to modernise London's private hire industry https://tfl.gov.uk/info-for/media/press-releases/2016/march/tfl-proposals-to-modernise-london-s-private-hire-industry

Addison Lee operates a fleet of Light Goods Vehicles (LGVs) and as an operator we recognise that LGV traffic, which now makes up 17% of the traffic in London[3], has increased. This increase has been driven by changing consumer demands, technological changes and 'Click and Collect' models which have altered the way many services operate.

2. What are the key causes of these changes in congestion?

London has a complex transport network and the causes of congestion are varied. Rising PHV numbers is just one factor which needs to be considered. According to TfL, licensed PHVs have increased in number in London from 60,000 in 2013 to over 100,000 in 2016. In London, as of 14th August 2016, there were 109,345 valid PHV drivers, an increase of over 50% in two years[4].

While there is a benefit to the consumer in the form of greater availability of PHVs, this has inevitably had a knock on effect on congestion. The former Mayor of London, Boris Johnson MP, said in October 2015 that as recently as two years ago, one in 100 vehicles in the Congestion Charge zone was a PHV. In 2016, the figure is now one in 10[5].

In assessing the causes of traffic congestion, roadworks are an important factor. According to a recent INRIX study the duration of planned works in London has increased by 362% since 2012, which has resulted in a reduction of roadway capacity and an increase in congestion. The number of hours roads were disrupted by unplanned incidents also rose, by 23% over the same period[6].

Major developments such as those around London Bridge Station and Euston Road, although essential, are further examples of planned roadworks which are causing significant disruption. The Euston Road proposals would see the six-lane A400 Euston Road lose one lane in each direction between Regent's Park and Pentonville Road from 2020 until 2026. Although Addison Lee understands the importance of improving London's infrastructure, these projects are carried out at a significant economic and environmental cost to the public which must be fully accounted for.

As we have previously noted, changing consumer behaviour and vast improvements in technology have also led to an increase in the amount of light commercial traffic on London's roads. Addison Lee's same day courier service averages around 15,000 deliveries per week, equating to 780,000 deliveries per year, and our combined overnight delivery figures total one million deliveries per year. As an LGV operator in London, we welcomed the GLA Transport Committee's decision to consult on the efficiency and sustainability of this industry, with a view to reducing congestion. In our consultation response we supported an industry-led solution that included a permitting regime and a daytime restriction on Heavy Goods Vehicles (HGVs). A copy of our consultation response can be found in the appendix.

Other wider trends contributing to congestion include a 2.8% population rise from 2012-2014, a growing economy and falling unemployment.

[3] Mayor's Question Time https://www.london.gov.uk/mayors-question-time-2016-06-22 (22nd June 2016)
[4] Licensing information https://tfl.gov.uk/info-for/taxis-and-private-hire/licensing/licensing-information
[5] TfL sets out plans to modernise and enhance London's private hire industry https://tfl.gov.uk/info-for/media/press-releases/2016/january/tfl-sets-out-plans-to-modernise-and-enhance-london-s-private-hire-industry
[6] London Congestion Trends http://londonfirst.co.uk/wp-content/uploads/2016/05/London-Congestion-Trends-FINAL.pdf

3. What impact does congestion have on Londoners, the city's economy and its environment?

London congestion is caused by a city which is thriving, however excess traffic can choke economic growth and negatively affect the quality of life for many of its inhabitants. Rising traffic impedes freedom of movement. For businesses like Addison Lee this translates into delays which inevitably add an economic cost to doing business. The *Financial Times* describes London as "*Europe's gridlock capital*"[7] citing research from the Centre for Economics and Business Research and INRIX which found that the cost of congestion to the London economy was $8.5bn in 2013.

The implications of doing nothing are clear, according to a recent report the current death toll from pollution stands at more than 9,000 lives *per annum* and the economic cost is put at £3.7 billion[8].

4. What can London learn from other cities in its effort to reduce congestion?

Addison Lee believes that London is at the forefront of many modern cities which are attempting to reduce congestion. There have been several sensible proposals which made recently to address London's formidable environmental challenges.

In April 2016, the Institute for Public Policy Research (IPPR) suggested extending the Congestion Charging zone as far as the North and South circular roads by 2019[9]. Addison Lee supports this as it would further cut pollution and fund a greener London.

As we previously stated in our submission to the GLA Transport Committee's consultation on Light Commercial Traffic, we support a restriction on HGVs in Greater London during daylight hours. We strongly believe this policy would help reduce emissions and enhance cyclist safety on London's roads. In this respect we are aligned with the London Cycling Campaign which is calling for a rush hour ban on HGVs.[10]

TfL should also consider the feasibility of a consolidated road-pricing scheme that considers integrating the Congestion Charge, Ultra-Low Emission Zone (ULEZ) and the Toxicity Levy into to a single road-pricing scheme, with different levels of charging within the zones that vary in price according to the levels of pollution and congestion in each area. IPPR has previously stated that such a scheme "*would bring in significant revenues*" that can be used for further investment into public transport, cycling, walking, car-sharing, and support schemes for drivers and businesses[11].

As well as domestic proposals, there are many international initiatives which London should consider. For example, information regarding taxi and PHV journeys across any major city offers a rich dataset which can effectively inform transport planning. New York is already ahead of London in this regard. Every month, the New York City Taxi & Limousine Commission releases data that covers taxi movements in the city. Currently, this Livery Passenger Enhancement Project (LPEP)[12] data goes back to 2009 and covers over 1.1 billion individual taxi journeys in New York[13]. The insights that can be gleamed from such an in-depth analysis of traffic movements is invaluable.

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[7] https://www.ft.com/content/844ec314-4817-11e5-b3b2-1672f710807b (24 August 2015)
[8] 'Extend congestion charge as far as North and South Circular roads to halt pollution' http://www.standard.co.uk/news/london/extend-congestion-charge-as-far-as-north-and-south-circular-to-halt-pollution-a3219966.html
[9] London: Global green city http://www.ippr.org/publications/london-global-green-city
[10] http://lcc.org.uk/pages/no-more-lethal-lorries
[11] London: Global green city http://www.ippr.org/publications/london-global-green-city
[12] http://www.nyc.gov/html/tlc/html/industry/shl_serv_enh.shtml
[13] TLC Trip Record Data http://www.nyc.gov/html/tlc/html/about/trip_record_data.shtml

5. How effective is the Congestion Charge? How should this scheme be modified?

Addison Lee believes that the Congestion Charge would be an ineffective policy instrument to control the number of private vehicles on London's roads. A recent consideration of whether to remove the Congestion Charge Zone exemption for PHVs has been is wrongheaded and would have negative unintended consequences.

In recognition of the impact on congestion which the surging number of PHVs is having, in late 2015 the former Mayor of London appealed to central Government for legal powers to cap PHV numbers. This request was refused and subsequently the Mayor asked TfL to investigate feasibility and impact of removing the Congestion Charge exemption currently afforded to PHVs.

Removing the Congestion Charge exemption will not be an effective policy to bring down the number of PHVs on London's roads and is a blunt policy instrument that fails to accurately address a nuanced practical challenge. Use of the Congestion Charge to load additional operating costs onto the most responsible Operators will not ensure a reduction in numbers. Instead, drivers with less reputable Operators will be required to work additional hours to make up the daily cost of running their vehicle and/ or passengers will end up paying more for journeys.

The growth in PHV numbers offers an opportunity for a root and branch review of current PHV regulations including a data-led consideration of market need. Instead of an arbitrary charge, one of the many ways PHV numbers can be reduced in London are through higher barriers to entry for prospective PH drivers, which in turn will also improve passenger safety. Accordingly Addison Lee has supported the new Mayor's steps in this regard.

6. To what extent would a usage-based road-pricing regime help reduce congestion?

Historically the PHV industry has operated what might be referred to as a 'Direct Allocation' model. Addison Lee pioneered the use of technology to direct drivers to passenger pick-ups. Upon arrival the vehicle is directly allocated to the nearest passenger who needs picking up and the cycle repeats. This model has served London well for decades and Addison Lee has optimised its systems to save its drivers 18,000 'dead miles' every day[14] - dead miles are those in which a taxi or PHV does not have a passenger on-board.

Since 2013 we have seen the advent of what might be referred to as the "Cloud Allocation Model". In this model the Operator requires a very large number of empty vehicles on London's streets, everywhere, at any given time, to ensure that if a passenger opens a smartphone app to summon a PHV, that there is an empty vehicle nearby with a short ETA. This model changes fundamentally how an Operator uses a scarce public good, namely roadspace. Inevitably some 30,000+ drivers on the Uber platform working on a Cloud Allocation basis has had a major impact on London traffic.

The Congestion Charge is a one-time only daily charge which makes no distinction between a PHV undertaking work from an Operator based in an outer London Borough dropping a client off at a central London hospital (which arguably should not be penalised) and a driver working from a Cloud Allocation model driving empty into central London to look for work. More accurate data of PHVs' actual use of London roadspace would enable per minute pricing potentially with a lower charge for vehicles with a passenger on-board and potentially a higher rate for vehicles which are effectively touting for business via an app.

[14] http://www.telegraph.co.uk/technology/technology-topics/11471327/Londons-Addison-Lee-prepares-for-Uber-challenge.html

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

In both of Addison Lee's responses to two TFL consultations on the establishment of the ULEZ we fully supported, without reservation, the establishment of ULEZ in the most polluted areas of London. We have attached these consultation responses in the Appendix.

We look forward to working with the Mayor and Greater London Assembly in the coming months and years ahead on ULEZ. In both our consultation responses we highlighted the difficulties and challenges that needed to be overcome by both TfL and Licensed PH Operators for the policy to be effective.

Addison Lee owns the largest fleet of hybrid vehicles in London and our vehicles are replaced every three years. We are concerned, however, that the current absence of a fast charging infrastructure for Electric Vehicles (EV) impedes the transition of our fleet to plug-in hybrids or pure EVs. At this juncture, we are at a crucial moment in migrating commercial fleets to cleaner vehicles. To deliver on the ULEZ objective of pollution reduction, it is critical that a fast charging network is put in place as soon as possible to allow the PH industry to migrate to Zero Emissions Capable (ZEC) vehicles.

To support the ULEZ implementation process, Addison Lee is providing TfL (via its contractor the Energy Saving Trust) a dataset relating to our vehicles' movements to inform where rapid charging sites should be located.

Failing to provide an adequate and comprehensive infrastructure will mean that hybrid vehicles will be forced to operate sub-optimally and this will prevent London's air from being cleared up. As a matter of urgency, we have requested further information on the charging network that will be in place and exactly how it will service the PHV industry. We believe the current plans will fail to deliver an adequate infrastructure to support ULEZ.

8. What would be the benefits and drawbacks of these other interventions?

The scale of the London's pollution problem means that all policy measures must be considered.

I. ***Tolling for river crossings or other major infrastructure:*** Addison Lee believes that tolling does not deliver a London-wide solution and may only displace areas of high pollution rather than address the root cause of the problem.

II. ***Workplace parking levy:*** A workplace parking levy is an effective policy incentive for employers to remove workplace parking and encourage their employees to use more efficient transport methods. A workplace parking levy in Nottingham has resulted in significant investment in the transport infrastructure and less traffic on the city's roads.[15]

III. ***Devolving Vehicle Excise Duty to London:*** There are practical problems with devolution of Vehicle Excise Duty. If the Government agrees to devolution, which is highly unlikely given the pressures on HM Treasury given Brexit pressures, there are likely to be practical problems concerning the hypothecation of revenues.

[15] House of Commons Library Standard Note (SN628) *Roads: Workplace Parking Levy (WPL)* 1 March 2012 http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN00628

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

In Addison Lee's response to the GLA Transport Committee's investigation into Light Commercial Traffic in London, we recommended an industry-led approach to tackle congestion that focused on two policy recommendations.

i. **Permitting:** There is a clear requirement for the more effective provision of loading and unloading dispensation for LGVs in London. To address this issue, Addison Lee believes that TfL should introduce a system for registered, multi-client courier companies in the form of a disc parking permit. This would reduce the cost burden on couriers, while enabling vehicles to park in a more managed fashion, reducing congestion and carbon emissions.

ii. **Heavy Goods Vehicle restrictions:** Addison Lee recommends that HGVs should have restricted access in Greater London during daylight hours to reduce congestion during peak traffic hours. This would open-up loading and unloading space for LGVs vehicles, while also reducing emissions.

In terms of next steps, we recommend commissioning a detailed economic and environmental impact assessment of LGVs on road congestion to fully assess London's unique circumstances. If you require further information on the above policy recommendations, we have attached our response to the GLA Transport Committee's consultation on Light Commercial Traffic.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

The number of PHVs on London's roads has risen from 60,000 in 2012 to over 100,000 today with predictable ramifications on congestion levels. Addison Lee undertakes over 10 million journeys per year in London with a driver base of some 4,500 drivers. We fully recognise that any solution to London's congestion problem will have to include new policies and regulations for the PHV sector. A rigorous, evidence-led approach must however be taken to policy-making.

Currently, Addison Lee's preferred solution for limiting PHV numbers is to raise the barriers for entry. Higher standards would be better for consumers, congestion and the environment.

Vehicles are currently eligible for PHV licencing to 10 years of age. This should be cut to five years as vehicles undertaking PHV work can cover 50,000 miles a year. Vehicles manufactures consider vehicles to be at end of life at approximately 100,000 miles and between 8-10 years. PHV work is hard on vehicles. Bluntly vehicles that have done 250,000+ miles of PHV work and are considered by their manufacturer to be at end of life are not safe and should be on London's roads, much less be offering PHV services.

Any other measures must be subject to a detailed impact assessment (both in terms of impact on the PHV sector *and* on congestion), which would provide useful quantitative data to inform the proposed regulatory framework. The findings of such an assessment would also inform policy discussion around more sophisticated policy solutions beyond a blunt quantity restriction on PHV numbers or the imposition of an ineffective and arbitrary charge, such as the Congestion Charge.

Addison Lee remains open to discussions on the most appropriate course of action to address rising traffic congestion issues.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Support for car clubs should be seen as part of a part of the wider drive aimed at providing the public with alternatives to private car ownership and use in London. Addison Lee believes TfL is making good progress in this regard. We understand however that car clubs have been more successful in London's outer boroughs and are unlikely to have a significant impact on congestion in central London.

By providing the public with convenient access to a vehicle, car clubs such as DriveNow and ZipCar reduce the utility of vehicle ownership and in turn can help to reduce the number of vehicles on the road. Greater use of car clubs will help drive a further reduction of private vehicle use. The Mayor and TfL should continue to follow their integrated approach to facilitating alternatives to private vehicle ownership.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Addison Lee believes that greater enforcement action to end violations of bus lane rules would have a significant impact on the efficient running of bus services. At present, a failure to fully enforce the rules encourages private vehicle drivers, and in particular delivery vehicles, to use bus lanes inappropriately. This forces buses into other lanes and has a disruptive knock-on effect on traffic flows.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

The TfL Transport Strategy has been successful as in driving modal shift, particularly from private vehicle journeys to mass transit. This does however create a 'Last Mile' problem of how to get passengers from the tube and train stations at which they arrive to their final destination. Traditionally the taxi and PH sector has made a valuable contribution in this regard. Addison Lee supports the encouragement of active transport modes such as walking and cycling but we urge TfL to continue to take a holistic approach and ensure that measures taken to reduce congestion in central London do not adversely impact the provision of PH services in the outer London boroughs.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Addison Lee believes the current road network is sufficient and no substantial infrastructure investment is necessary. Furthermore, projects of this kind would cause significant, and avoidable, disruption during their lifespan.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

New roads would inevitably encourage more people to drive. As above, Addison Lee does not believe investing in new roads is a sensible proposal for policy making.

16. How should new road infrastructure be funded?

Addison Lee does not believe investing in new road infrastructure in London is a sensible use of scare public funds.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

Addison Lee supports initiatives such as the lane rental scheme. However, we believe more data is needed in order to fully evaluate how effective it has been. Please see also our answer to question 2 in this response in which we consider in detail the impact of roadworks.

There are a number of ways TfL can improve roadworks effectiveness. A contractual requirement to ensure round-the-clock working should be implemented as a prerequisite to undertaking roadworks, except in an emergency. While we recognise the necessity of emergency roadworks, for example to fix a burst water main, we believe that those responsible for public such works should be incentive better to encourage better long-term project maintenance of roadworks.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

While Addison Lee is supportive of measures to encourage active travel modes, enabled by the provision of Cycle Superhighways and wider pavements for pedestrians, these unavoidably reduce the total amount of available roadspace and therefore contribute to increased congestion.

As is the case with roads, additional pavement space encourages greater usage. Pavements in central London, especially in popular shopping areas, are already over-capacity. Long-term solutions will therefore need to be found, such as creating pedestrianised, traffic free, zones.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Technology offers huge potential to TfL in a number of areas, including traffic flow management, and as such should be fully embraced. For example, satellite tracking, such as that employed as part of the iBus system, allows TfL to gather important journey data and trends such as congestion hotspots and take action to mitigate the worst effects.

Data collected by private companies and organisations use of technology must also be utilised. Addison Lee is committed to sharing data with local transport authorities in order to enable improved road management. Addison Lee also partners with INRIX feeding in on-the-ground transport travel data helping to ensure the accuracy of live traffic updates received by millions across the country.

As the PHV trade embraces next generation electric vehicles, tracking traffic flows, congestion and developing knowledge of popular taxi journey routes, will play a vital role in determining the location and volume of Rapid Charging Points. Addison Lee is working closely with the Energy Saving Trust and TfL in this vital area, sharing our journey data and analysis, to support the successful implementation of the Ultra-Low Emissions Vehicle Delivery Plan.

It is also important for TfL to consider the impact of private companies' different approaches to using technology. With regards to the PHV sector, a distinction should be drawn between the use of continuous direct allocation technologies, which matches up jobs requested by consumers and allows efficient pre-planning of driver jobs keeping the proximity of drop-off and pick-up locations close, and those that use a cloud allocation model, which are based on flooding the streets with empty PHVs at all times to ensure short ETAs. Having numerous empty PHVs on London's road is an inefficient use of road space and increases congestion.

Furthermore, where a PHV surge charge is in place, the problems are exacerbated as more vehicles are drawn to areas of high demand at peak times.

As noted in the response to Question 4, TfL should follow best practice from other locations, such as New York City, and move to an LPEP system as a precursor to dynamic road space charging.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

Addison Lee welcomes the establishment of the Road and Transport Enforcement team, however we believe more time is needed to fully analyse the impact of their work. As noted in our response to Question 12, greater enforcement action is needed to prevent the misuse of bus lanes. In addition, we would welcome opportunities to engage directly with the team to share knowledge and experience.

- ENDS -

APPENDICES

1. Addison Lee GLA Transport Committee – Commercial traffic in London Investigation response – 3 September 2015
2. Addison Lee Ultra Low Emission Zone Consultation Response 1 – January 2015
3. Addison Lee Ultra Low Emission Zone Consultation Response 2 – August 2015

From: Brian Southgate [redacted]
Sent: 03 August 2016 08:15
To: Georgina Wells
Subject: Traffic Congestion in London

Subject: Traffic Congestion in London

As we are situated to the East of London, our experience is based on trying to access the City from the East.

Whilst we understand that the Banking Crisis of 2008 led to a huge reduction in economic activity and therefore Traffic From 2010 until Late 2014 our Journey logs are remarkably consistent.

The only logical entrance to London from Southend with a large PCV is via A13, Limehouse Link, The Highway, Tower Hill, Lower and Upper Thames Street and the Embankment, then either via the Strand/Aldwich or Parliament Square depending on Destination. We avoid Northumberland Avenue, as the Traffic Lights at Trafalgar Square have, since Trafalgar Square's remodeling only let 3 or 4 vehicles across at each phase.

From 2010 till Late 2014, journies to Tate Modern/ Parliament Square/Tower of London were taking 1 Hour 30 Mins to 1 Hour 40 Minutes. With the commencement of the East/West Cycle Super Highway works, these Journies rapidly escalated to 2 Hours 45 Minutes to 3 Hours 15 Minutes.

Currently, although these works are now nearly complete, Journey times are routinely around 3 Hours during the day and over 2 hours in the evening.

We have tried to access Royal Albert Hall/Kensington Museums via M25, M40/A40, West Cross route, which makes a 50 mile journey into a 90 Mile Journey. We have Managed this journey in 2 Hours. This has become necessary because using our favoured route takes 3 Hours 30 Minutes.

A final observation is that using the Traffic lights at The Ship and Shovel in Barking as a pinch point simply does not work, as this causes a massive build up of queuing traffic. We feel this would work better if the traffic was just allowed to trickle through. Likewise the Lights at Ardleigh Green/ Gidea Park A127

Clearly, it is our view that London's obsession with Cycle Lanes, is hugely responsible for much of the congestion on our routes. This is sending a clear message to those outside the city, particularly Schools, who naturally want to Visit London attractions such as Museums. That message is you are not welcome. We are now actively discouraging Schools who are our customers from London visits, as it is unreasonable to expect 45 6 year olds to sit on a coach for over 6 hours in order to get 2 hours in a Museum.

Brian Southgate
Transport Manager
Advance Minibuses Ltd
[redacted]

AICES Response to London Assembly Transport Committee investigation into traffic congestion in London

The Association of International Courier and Express Services (AICES) welcomes this opportunity to respond to the London Assembly's Transport Committee's investigation into traffic congestion in London.

AICES is the UK trade organisation for companies handling international express documents and package shipments. Our members provide door-to-door transport and deliveries of tracked next-day or time-definite shipments, including documents, parcels and merchandise goods. A recent study by Oxford Economics, found that in 2010, the express sector contributed £2.3 billion to UK GDP, and the sector facilitated £11 billion of UK exports a year. More than two-thirds of businesses reported that express services were vital or very important to their business overall and over 80% of UK businesses surveyed state that their businesses would be badly affected if international next-day delivery services were no longer available. London, in particular, relies heavily on express services because of the international nature of the business conducted in the Capital.

Section: General questions

1. How has traffic congestion changed in London in recent years?
2. What are the key causes of these changes in congestion?
3. What impact does congestion have on Londoners, the city's economy and its environment?

In order to meet the demands of London businesses for reliable and efficient express services, AICES members need a road network which enables predictable journey times and access to deliver and collect to meet time-sensitive delivery times. Speed and reliability are absolutely crucial if London is to remain competitive in the international market place.

AICES Members are concerned that the levels of congestion in London are rising and that delivery times can be further hampered by a lack of loading and unloading bays. AICES believes that given that express services are so crucial to London's economy, the need to have speedy and predictable delivery times should be factored into transport planning. For example, AICES supports TfL's objective to ensure that cycling in London is safer and where possible to ensure properly segregated lanes. However, AICES believes that more consideration should be given to loading and unloading bays so that parcels and packages can still be delivered to businesses operating along the cycling superhighways.

Specifically in terms of loading and unloading, the express sector calls for:

- Cycle lanes outside the loading bay.
- Long loading bays, running almost the full length of the road between junctions, capable of taking HGVs.
- Loading bays situated immediately outside the premises the vehicles are delivering to.
- Street layout not obstructing the flow of traffic / loading bay is inset.
- Cyclists and freight given priority over car parking.

Charging for road usage

5. How effective is the Congestion Charge? How should this scheme be modified?
6. To what extent would a usage-based road pricing regime help reduce congestion?
7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

AICES supports the Mayor's determination to improve air quality and reduce emissions in London. Our members take their environmental responsibilities seriously and programmes are in place to reduce carbon footprint and the environmental impact caused by express operations. Across the industry, express services make continual improvements to fuel efficiency and operate the minimum number of vehicles and aircraft needed to deliver an effective service to customers through efficient network planning and consolidation at hub operations. A number of our Members already operate electric vehicles and hybrid vehicles and stop start engine technology, as well as innovative fuel alternatives such as LNG.

AICES believes that with congestion charging consideration should be given to the fact express delivery vehicles have to access London and therefore any road charging is simply an additional unavoidable cost to business. AICES would therefore urge that any further usage based road pricing scheme differentiates between commercial vehicles and domestic traffic.

In terms of extending the Ultra Low Emission Zone (ULEZ) and imposing an emissions surcharge, it is important that any decision to change the ULEZ implementation date gives fleet operators a reasonable timeframe in which to renew their fleet. Fleet replacement cycles in express services are typically up to five years for both HGVs and vans. By September 2019, the Euro VI standard will have been in place for HGVs for 5 years but for only 3 years for vans. Van operators wanting to comply would have to renew vehicles ahead of schedule, which is not only costly for operators and customers but is also an inefficient use of resources which in itself will have an environmental impact. Given the later start of the relevant Euro regulation, it would be logical to allow the van market additional time to achieve compliance with each stage.

Section: Measures to target specific types of vehicle

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas in peak times?

In relation to express services, as stated above our operations are crucial to London businesses and our delivery and collection times have to coincide with the business working day.

Any specific restrictions on delivery vehicles in London during peak times would have an enormous impact on the express industry and London as a whole. Deliveries cannot easily be retimed outside of peak hours owing to local restrictions put in place and managed by the 33 different boroughs. Furthermore, the London Lorry Control Scheme already limits routes which can be used at night and at weekends. Adding restrictions on delivery vehicles during peak hours would further constrain the window in which deliveries can be made. Specific restrictions on HGVs would also have a negative environmental impact since an HGV vehicle carries roughly 8 times the material of a van. The Express sector uses HGVs to transport goods arriving by air from growth markets early in the morning to a service centre in the city before distribution by courier vans to customers for example in the financial services, pharmaceutical, and engineering sectors before 9am.

Restrictions on delivery vehicles can also damage the business case for investing in alternative fuel vehicles. Vehicles which run on gas or electricity are significantly more expensive to purchase, and this investment is only worthwhile if the vehicles can be used on multiple shifts throughout the day.

Removing the ability to use them in peak hours would therefore make it harder for operators “go green”.

It has been suggested that one way to reduce the number of delivery vehicles would be through consolidation centres. The main integrators offer a door to door service, where customers can track their package throughout from collection to delivery and already have their own hub ‘consolidation’ centres. The nature of express services means a van needs to go into the City collect packages so will also normally enter laden with deliveries. It would not be efficient to drop off deliveries at a hub and go into the centre of London empty. For express services, therefore, outer-City consolidation centres would not be an option that could be considered, although such centres could be considered by other sections of the logistics industry.

AICES 2 September 2016

From: Luke Barnes [redacted]]
Sent: 10 August 2016 11:41
To: Georgina Wells
Subject: FW:

Hello,

I am writing in response to a request by the London Assembly regarding their Investigation into traffic congestion in London.

I am the director of a coach company based in Swindon (80 miles from London) who on average probably bring 5 coaches a day to London.

Over recent years there has been a dramatic increase in congestion in London. We saw a reduction in congestion immediately after the introduction of the congestion charge but since then the situation has got gradually worse. It is now not unusual for it to take longer to get from the outskirts of London to the centre of London (10 miles) than it takes us to get from Swindon to the outskirts of London (70 miles). This congestion is generally worse on weekdays but recent events at weekends in London (such as the prudential bike race) can seriously impact our ability to effectively bring groups of tourists to London, on that weekend alone we had 3 cancellations as passengers just cannot be bothered visiting London if their arrival times and ability to be dropped near the attractions they wish to visit are impinged.

Our main cause of concern is that coaches in most cases get treated the same as other road users when, in fact, they should be being encouraged as part of a solution. Our largest coaches seat 96 people, this is potentially 96 cars we can take off the road. However, our coaches have to sit in the same congestion as these cars. Furthermore, due to reductions in available coach parking (mainly due to the cycle super-highway) our coaches frequently struggle to park near the attractions where we have dropped. This often leads to drivers having to drive around these congested streets in empty coaches looking for some where suitable to park. Allowing coaches to use all bus lanes, having sensibly located central parking and providing suitable places for coaches to drop their passengers near the attractions they wish to visit would all help the coach industry be able to entice people onto coaches rather than driving them into their cars.

The impact this has on London is that we simply do not bring the number of tourists that we previously have to London, we find that it is now just not worth the hassle for a lot of people. If we leave Swindon at 0800 in the morning, it can easily be 1130 before we are dropping off at an attraction, this is too long for people and we have noticed a definite shift in people choosing for visitor friendly destinations such as Portsmouth and Bristol. This means money being diverted away from London's economy when we should be promoting it as an exciting, vibrant and easy accessible destination to visit.

We believe the way forward is to tackle the vehicles which cause most of the problems. Whilst we don't necessarily agree with the loss of road space caused by the cycle super-highway, we realise this is unlikely to change. However, we believe, as another environmentally friendly way to travel, coach travel should be made easier by adjusting some of the regulations. In our minds, charging taxis, cars, vans etc. which have no positive impact on reducing congestion will all help to alleviate the problem but it is important that road users who do have a positive impact on reducing congestion aren't penalised at the same time. I imagine the easiest way of

achieving this would be to increase the congestion charge but perhaps also only allowing certain vehicles into certain areas at certain times of day should also be considered.

Please let me know if I can be of any further help.

Many thanks

Luke Barnes

Supplier of transport services (athletes and officials) to the London 2012 Games.
Barnes Coaches Ltd.
Woodside Rd, South Marston Park, Swindon, SN3 4AQ
[redacted]
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TRAFFIC CONGESTION IN LONDON

RESPONSE FROM THE BATTERSEA SOCIETY

Please reply to: [redacted]

Increased traffic congestion

In Battersea a major cause of increased congestion results from the development of the Vauxhall/Nine Elms/Battersea Opportunity Area (VNEB). Unfortunately there appears to have been a lack of any strategic approach to congestion at the start. As a result it has not been possible to increase the width of Nine Elms Lane. It now appears it will be impossible to provide bus lanes both east and west as well as lanes for cyclists. This will have an inevitable effect on congestion.

This increased congestion will be exacerbated by consented and planned developments along Battersea Park Road, York Road and elsewhere within Wandsworth.

Real time information and forward warnings on congestion, where provided on main routes into Central London, are extremely useful within the central area to warn of potential delays.

There should be more active campaigns informing the public of peak congestion times and encouragement to avoid these periods for non-essential journeys. Such encouragement could include reminders of public transport or park and ride alternatives (see below).

PTAL assessments appear to be no longer fit for purpose because they do not take account of limitations on the capacity of public transport. Rather than being considered in relation to each individual planning application those limitations need to be set within the context of all current and future developments. The same is true of road congestion.

Pollution is having a major impact on Londoners. The combination of relatively narrow roads, buildings often not set back from the pavement and increasing congestion will further increase pollution levels particularly along Nine Elms but also at congested traffic and pedestrian junctions such as those at Battersea Park Road and Queenstown Road, at Clapham Junction, at York Road and Plough Lane and at Battersea Bridge and Battersea Park Roads.

Charging for Road Usage

Consideration should be given to reintroducing the Western congestion charge.

Measures to target specific types of vehicle

Overall bus traffic should be facilitated rather than reduced however there is room for much better phasing to reduce congestion. It may be of benefit to make route changes to avoid over-capacity in Central London as buses travel through to supply a need further along the route. Oxford Street is notorious but Piccadilly, the Strand and other main streets often have convoys of buses, many on the same route. Anecdotally a 38 appears to leave Victoria Bus Station at least every 5 minutes even out of peak time.

An over-capacity of mini-cab services must increase congestion as well as reducing the ability of both mini-cab and taxi drivers to make a living. This will be worse as services such as Uber appear to operate as taxis cruising on call.

Residential areas adjacent to mini-cab offices suffer from mini-cabs taking parking spaces (some illegally) and/or running engines to suggest they are merely waiting to pick up a fare rather than actually parking. This causes pollution and congestion for residents and those making legitimate deliveries in these areas.

Delivery could be made outside peak times but not at the expense of heavy goods vehicles operating in residential areas during the night.

It appears that deliveries to 'Local' supermarkets are made by standard large vehicles more suitable for main stores. Supermarket chains should be required to use smaller vehicles where appropriate.

There should be greater promotion of car clubs with a requirement for higher numbers of cars to be included in such arrangements in new developments.

Encouraging Modal Shift

We are in favour of improving public transport and facilities for cyclists and pedestrians to encourage a move from private car use.

Cyclists welcome the cycle lanes and are concerned that pedestrians are inattentive and cause danger to themselves and other road users.

Pedestrians would welcome cycle lanes were all cyclists to use them rather than many using the pavement.

Bus users are concerned that the quite proper wish to provide safe road space for cyclists reduces the efficiency of bus transport.

Both cyclists and pedestrians will be increasingly disadvantaged by undifferentiated 'shared space' being offered to pedestrians and cyclists. This can work if clearly signed with surface differentiation/markings and, on suitable routes, a central kerb. However lack of discipline by pedestrians and cyclists could work against the success of these measures.

Overall these tensions need to be acknowledged and addressed rather than City Hall and TfL appearing to promote cycling as their preferred mode of transport.

The increase of 'professional' courier cyclists also needs to be acknowledged and possibly licensing/charging introduced for commercial cycling.

Transport fares in London are a positive disincentive against a shift from car to public transport. They are not only higher than in many cities such as New York but they are inflexible in not allowing transfers within a finite period.

There should be more promotion at street level of walking routes between key attractions and facilities in Central London, including estimated time and difficulty. Vancouver is exemplary in this respect with frequent, large signs showing street maps circled to denote what is within 5 or 10 minutes walking time. Some online route planners give this and there are some signs in tube stations but these do not compensate for lack of mapping on the street.

Attention needs to be given to providing a safe pedestrian crossing at the junction between the north-west side of Battersea Bridge across Cheyne Walk to Beaufort Street. This is a

key route for local residents and tourists through to the King's Road and to Chelsea and Westminster Hospital in the Fulham Road

Many cities operate Park and Ride car parking. Car parking facilities at rail and underground stations should be reviewed and improved as appropriate.

Providing new road infrastructure

This should be concentrated on provision for cyclists, pedestrians and public transport or infrastructure by-passing Central London.

Funds should be allocated to public transport infrastructure improvements

Maximising available road space

The economic efficiency of individual racks of bikes for hire should be assessed and where appropriate these should be removed as they too add to road and pavement congestion.

The overall subsidy provided for hire bikes should be reviewed and assessed against the merits of lower public transport fares.

Active Traffic Management

The phasing of traffic lights often appears to add to rather than mitigate congestion.

The siting of traffic lights and their number should also be reviewed. There is a concern that there are too many and in many cases a controlled pedestrian crossing could be preferable.

The Battersea Society
[redacted] 2 September 2016

Better Bankside

Making Bankside a thriving place to live, work and visit

Address

Bankside Community Space
18 Great Guildford Street
(on corner with Zoar St)
London SE1 0FD

Contact us

[redacted]
W betterbankside.co.uk

Greater London Assembly – Transport Committee
Investigation into traffic congestion in London

Response from Better Bankside

2 September 2016

Introduction

Better Bankside is the third business improvement district in the UK, and was the first one south of the river in London. Better Bankside has over 625 member businesses, who collectively contribute over £1.5m of BID levy annually to the neighbourhood.
Bankside's location, firmly within London's Central Activities Zone, plays an important role in connecting and linking up surrounding growth areas including London Bridge, Waterloo, Elephant and Castle and the City of London. The area has some of Central London's busiest road and cycle routes – including Borough High Street, Southwark Street and Blackfriars Road.
Today we know that there are some 6,000 residents living in Bankside, over 60,000 employees working here, and over 20 million visitors to the area annually. We expect the area to continue to grow over the next 15 years, bringing significantly more residents, businesses and visitors to the area.

Better Bankside already coordinates Bankside Urban Forest, a long-term strategy and partnership for improving the network of streets and open spaces linking the riverside to Elephant and Castle, on behalf of a wider partnership of local and strategic agencies. Our Smarter Travel work seeks to increase rates of cycling and walking, both for the commute and business travel purposes. Guided by targets set by a five year plan, we provide a wide range of cycling services including cycle maintenance, training, parking solutions, cycle freight and cycle loan schemes. The work is complemented by a number of newer initiatives to help our member businesses manage their freight and delivery requirements more efficiently.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Every 5 years, Better Bankside carries out an employee travel survey for its members. The result of the last survey carried out in 2015 suggest the mode share for commuting to Bankside by car is even lower than 5 years previously (0.9% versus just 2.6% in 2010). As in many parts of central London, we appear not to be experiencing an increase in congestion due to individual car use, but due to other factors.

2. What are the key causes of these changes in congestion?

We are not able to be clear about the causes of congestion in our area. This is frustrating and ultimately hinders our ability to implement and influence measures to mitigate it. We are, for example, not able to determine the extent to which traffic in the area has an origin or destination in our area or whether it is using Bankside roads as a through route to other areas. We understand that TfL can only provide this level of information if a specific origin and destination survey has been carried out. We would strongly endorse a more thorough programme of data collection that could help inform measures to reduce congestion in central London. At the very least, we would welcome a greater level of data sharing to enable all those with a role to play to target measures more effectively.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Our 2015 Employee Travel Survey asked respondents about the frequency of their trip being delayed. Of those who travelled by car as their usual mode, 50% were delayed frequently or nearly every trip. For those travelling by bus, the figure was 46% and motorcycle, 42%. The only (non-road) public transport mode that was near these figures was train, where 57% those using this as their usual mode reported they experiences delays frequently or nearly every trip.

These figures suggest that Bankside commuters travelling by road are regularly affected by congestion to the extent that their working time is reduced or that their commute time is lengthened. With those working in London having the longest commute journeys in the UK, this is contributing to negative impacts such as less time for family, sleep and physical activity[1].

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

We fear that whilst the ULEZ and Emissions Surcharge will be useful tools to combat polluting emissions from the oldest vehicles in the fleet, these measures will only have a very small impact on congestion in our area. This is because fleet and logistic operators are in the best position to simply upgrade their vehicles if required, with no associated changes to their operations in terms of reducing the number of vehicles on the road.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Better Bankside is already working with partners such as Cross River Partnership and other central London Business Improvement Districts to share information and develop good practice on delivery and servicing plans.

We are in the process of implementing a pilot 'personal delivery' service and have already tested an innovative cargo cycle for local business to business deliveries.

Our efforts are sometimes made more difficult by a number of factors including:

- Restrictions in place for night time deliveries due to very understandable resident noise issues. Whilst TfL has already invested in studies to develop good practice in this area, the results have not been adequately promoted, shared or further developed for different types of commercial area. We would welcome a much more widespread trial of different 'quiet delivery' practices and would be interested in hosting an element in our area.

- Loading and unloading for larger developments being enforced primarily through the planning process. Our experience is where deliveries are supposed to take place within the confines of loading bays, often at peak times on-street unloading takes place leading to localised congestion. At present, this appears to be only possible to enforce by reference to the original planning obligation. We would welcome further consideration as to how loading and unloading for large developments (over a certain sq ft or employee number) would be prohibited on street and could only take place within loading bays. We believe some kind of enforcement regime would be required with the receiving business / building owner being fined rather than the operator making the delivery.

[11] See the recently published report by the Royal Society for Public Health "Health in a Hurry" August 2016 https://www.rsph.org.uk/about-us/news/new-report-highlights-health-impact-of-rush-hour-commuting.html

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Bankside is well served by north-south bus routes, on Blackfriars Road, Borough High Street and one route on Southwark Bridge Road. However, there are only two east-west routes (RV1 and 381). Both routes have a usual frequency of more than 10 minutes. The current congestion on Southwark Street and Stanford Street is contributing to less reliable journeys times. However, assuming that this could be addressed, short east- west journeys by taxi could easily be replaced by a frequent bus service. We would therefore welcome a review of bus services across London to check that they are meeting current journey needs and helping to reduce journeys by car or taxi.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

As noted above there has been a significant shift from car to other modes in Bankside over the past 10 years.

Better Bankside has played a part (working with TfL) to encourage this through our range of services to promote cycling and walking. Whilst private car use is very low, we are able to play a role in enabling more public transport users to move to active travel modes, in turn to enable more capacity for private car users to move to public transport use where that is the best option. The current TfL investment programme in cycling infrastructure is very welcome. We would urge that the investment provided for the Quietway network be prioritised as this provides the greatest number of potential cyclists with safe routes to work. We would also like to see an upgrade to Cycle Superhighway 7 (Merton – The City), which falls well below the standards applied to the more recent Cycle Superhighways.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

As set out above, we are very supportive of the investment programme in cycling infrastructure. We also are strong supporters of increasing the space allocated to pedestrians. Our Smarter Travel and Bankside Urban Forest work over the last ten years has been grounded on the principle that walking and cycling are the most efficient modes for personal travel for Central London.

However, we are concerned that the zeal for improving cycle routes may have had some adverse impacts which are not being adequately mitigated for in the short to medium term. In particular we have observed higher levels of congestion on Southwark Street since the completion of the East-West Cycle Superhighway along the Embankment, Castle Baynard Street, Upper and Lower Thames Street. Our understanding is that this was predicted in the modelling carried out as part of the business case appraisal in 2014. We would have welcomed a greater openness about this and therefore a more informed debate with all concerned about how traffic levels could be reduced both for the Cycle Superhighway route and the routes which would be seen as alternatives.

Traffic Congestion London

Background Brewery Logistics Group(BLG)

The BLG is the trade association representing the key logistics firms servicing pubs, restaurants and bars in London. It sits on a number of groups and forums in the Capital and is a core member of the Central London Freight Quality Partnership.

The BLG is a forum for the interchange of information of mutual interest relating to all aspects of brewing logistics in London.

It currently represents 12 members who operate over 1150 vehicle days per week inside the M25, and account for approximately 75% of all beer delivered

1.Changes in recent years

From a freight perspective kerbspace is essential for all deliveries in London, and due to the growth of cycle superhighways and other infrastructure changes aimed at the cycling fraternity, kerbspace has become a much more sought after space that is diminishing by the week.

This has resulted in reduced travelling times across London, in the last 4 years, 2012 > 2015, 5 miles in Central London is taking 29 minutes as opposed to 20 minutes +45%, with 4 minutes of this being in 2015. Outer London has increased from 15 minutes to 19 minutes + 30% , with 3 minutes (75%) being in 2015.

Using the M25 has become much slower over the years and is the starting point for longer journeys into London in a lot of cases.

2. Causes of changes in congestion

> cycle superhighways

> lost kerbspace

> 20 mph speed limits

> extra freight to meet growing needs in London and cover congestion delays

> longer journey times

> growth of the home delivery trade

> growth of mini cabs

> growth of meal deliveries need to be monitored, for example Deliveroo (75% deliveries by cycle) has grown 400% since November and other companies are joining this market – Just Eat, Uber, Amazon etc, this needs close scrutiny and a road fund licence could be considered to help repair our damaged road network

> Rickshaws

NB The DfT prediction that the only form of transport to grow over the next 25 years is cars and this is a major concern (+11%)

3. Congestion impact on City's economy and environment

Have full assessments been made and published regarding the actual air quality problems in London and the resulting health benefits from measures being taken?

Points listed in 2 above are causing additional vehicles being required to meet increased demands and more in congestion resulting in growth in pollution

Congestion slows goods and services into shop, pubs etc

London's economy has grown faster than the UK, more than 3% annually since 2008 compared to the UK growth rate of 2% and is adding to congestion within the City.

Also employment figures of in excess of 5.5 million jobs in 2014 is up 5% on2013 and 12% on 2008, all have to be moved around London and looking at the underground performance 2012>2015 the use has increased significantly, being 3.2% up in 2015 surpassing the usage levels seen during the 2012 Olympic games

4. Lessons from other cities

All infrastructures vary from city to city and London hasn't the space, or land availability to build and develop a new infrastructure needed for the anticipated growth in population over the next 14 years, and will therefore need to find alternative ways of getting goods to customers in required delivery times.

London is unique and the largest contributor to congestion will, in the future, be the London Lorry Control Scheme run by London Councils, limiting 45% of a total week (168hrs) to normal deliveries, the remaining 55% having strict routes to operate in

5 Congestion charge effective or modification needed

Why should local residents continue to receive the current 90% discount on congestion charges, and now, when the TC (Toxcity Charge) is introduced next year 90% discount on this, when it is the car that is needed to be removed from our streets to bring down congestion that in turn creates more pollution/deaths

The removal of old diesel cars that can emit up to 20 times as much pollution as petrol equivalents is essential

6. Usage based road pricing to help reduce congestion

Not effective whilst the car receives discounts as per 5 above.

Freight, the key to keeping London alive, needs favourable consideration including a discount structure

7. ULEZ and emission surcharge to affect congestion levels

Yes if it includes cars, as these must be reduced to cove the increased freight needed for the increased population of 1.4 million (+16.3%) projected over the next 14 years

Should not be extended London wide for freight and should not be implemented until 7th September 2020 as is being planned for in the freight industry as a whole.

As far as cars are concerned this should be London wide and introduced earlier as being currently intimated

8. Effect of tolling for river crossing or other major infrastructures/work parking levy/devolving VED to London

> Tolls except for freight

> Work place parking levy, to whom and how would it work?

> VED revenue, raised in London, could remain in London and not be used for the national strategic road network as is being planned for 2020 to ensure that London becomes self-supporting from this revenue

9. How to reduce delivery vehicles in congested areas at peak times

Review London Lorry Control Scheme as a matter of urgency, as it is not fit for purpose as it is now.

At the present moment it only allows freedom of movement for 76 hours out of 168 hours available (45%) without using designated routes as laid down by the scheme and this can add many hours and cost to the operation, making it totally unacceptable to the freight industry.

Air quality and congestion with the predicted population growth will never improve overall until the LLCS is addressed

10. Minicabs effect traffic congestion

Why does the TC (Toxcity Charge) not to apply to taxis and uber cars?

TfL must licence / regulate and control mini cabs as per black cabs

11. Car clubs help congestion and how are these encouraged/electric cars

Pedestrianising streets and installing hundreds more charging points is going to be detrimental to the freight industry unless planned very carefully.

It would appear that electric vehicles are one of the modes for the future, but the plans for charging stations/points again must be planned very carefully to ensure that deliveries into all areas of London are not curtailed further.

It is estimated that by 2020 there will be more public locations to charge electric cars than there will be petrol stations

12. Bus services to help reduce congestion and how

> reduce empty running

> understand passenger needs and flows

> simplify bus network

> develop a tram system which is a much cleaner mode of transport

13. How can TfL shift use from private car to public transport

> increase congestion charge for all cars with no discounts

> stop overcrowding

> keep fares competitive

> improve performance

> make franchise train operators more accountable

> make it easier to deliver freight via the river

14. Can new road infrastructure reduce traffic congestion and how

Roads can be improved to help cyclists/pedestrian's safety but this must be done in detailed consultation with the freight industry to ensure that negative effects on essential movement and services are minimised

15. New roads leading to more cars, how to avoid

There is a great risk of this happening so TfL must

> not encourage the public to use their cars by charging a full payment of CC and TC

> introduce car exclusion zones

> give freight priority to effect deliveries

> take what was learnt during the Olympic games 2012 with regard to road management

16. Funding of new infrastructure

> PCN revenue

> LLCS fines

> VED

> Revenue from tolls

17. How effective is TfL's limiting of road works and can they made more effective

One of the most significant reasons for increased congestion in London is road works, increasing by 362% (2437hrs) in a 4 year period 2012 > 2015 with the largest being in 2015.

It is interesting to note that unplanned traffic disruption has increased by 23% over the same period

In summary there has not been an overall effective control of road works so far and we need

> far more enforcement

> greater preventative measures

> closer monitoring on works being carried out with an overall feedback from buses, black cabs etc

> 24/7 working on all critical routes

It must be remembered that increased congestion from road works increases journey times and all the negatives that go with this.

It is interesting to note that London's building plans of 59k houses per year equates to 7715 hgvs per working day

18. Additional space to cycling and pedestrian infrastructure effects on congestion

Very damaging as large chunks of kerbspace, essentially required for freight deliveries, has been made inaccessible.

Future changes to enhance cycling and pedestrians must take into full account the need of freight before finalising any more "enhancements for cyclists" projects

19. Can enhanced technology help TfL manage congestion and how

No comment

20.Has the Road and Transport Enforcement Team tackled congestion

Could be a lot more effective if it enlisted help from other interested parties such as buses, black cabs etc

21 SUMMARY

Freight cannot, and must not, be seen as the ogre of the piece. 90% of all goods moved in London are moved by road which will equate, when the population reaches 10 million, to 17445 vehicles per hour (24/7)

Freight must operate, and be allowed to operate, in a way that is efficient for the industry/customers but not at the overall expense of our environment and communities.

London is the first metro to surpass 100-hour threshold per annum for wasting hours in gridlock (101 hrs) with Stuttgart second at 73 hrs and Antwerp third at 71 hrs

Congestion involves extra travelling time and/or unpredictable arrival times and is caused by an imbalance between travel demand and transportation capacity (remember there are 168 hrs in a week) being caused through road works, road incidents, bad weather conditions, lack of unloading space/facilities or these already being used on arrival.

Finally freight/delivery vehicles only come into the capital for one specific reason, to collect or deliver goods, provide a service, and they will then leave as quickly as possible after performing their task. Unfortunately they are often prevented from doing this by many of the issues raised in this report .

London Assembly Transport Committee: Investigation into traffic congestion in London ~ submission from Campaign for Better Transport

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to contribute to the London Assembly Transport Committee's investigation into traffic congestion in London.

The issue is timely, with increasing congestion affecting every aspect of Londoners' lives, not least the quality of the air we breathe and the reliability of the public transport and emergency services on which London depends.

With London's population projected to grow to 9.2 million in 2021, rising to over 10 million in 2036, we face a strategic challenge as to what kind of city we want to be. Trying to accommodate 20th century car dependency in a 21st century city will condemn London to permanent congestion, pollution and stagnation.

We cannot build our way out of congestion: new roads generate new traffic, providing temporary congestion relief with permanent environmental damage. Proposals for new road-based river crossings are an expensive distraction from sustainable solutions.

Instead we need a radical change of approach, using the design, operation and pricing of London's road space to prioritise space-efficient travel options – public transport, walking and cycling – and to reverse the growth in delivery vehicles with a comprehensive modern freight strategy.

Cities around the world are embracing this approach. European cities have long adopted policies promoting sustainable transport and car-free zones, and this continues: Paris is reclaiming streets for walking and cycling, Oslo is phasing out diesel and petrol vehicles. New York has shown how dedicated cycle highways reduce congestion. Even Los Angeles – a byword for car dependency – has now adopted a transport strategy that puts sustainable transport and demand management at its heart.

London has led the world in many initiatives, including the congestion charge, smart ticketing for public transport, on-street bike hire, and lane rental for road repairs, as well as impressive management of the London 2012 Olympic Games.

We now have the opportunity to take the best examples from other great cities, and lead again, creating a dynamic and liveable London for the 21st century.

General questions

1. **How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?**
2. **What are the key causes of these changes in congestion?**

London is the 'congestion capital of Europe' according to the annual INRIX congestion report. It found traffic congestion in London had risen noticeably since 2012, with journey times in Central London increasing by 12

per cent annually, although the volume of car traffic continues to fall. [1] TfL's latest Travel in London report reports a recent fall in journey time reliability. with a 13 per cent increase in average traffic delay since 2013.[2]

The TfL Roads Task Force (2013) suggested that there was no one single cause of congestion: "the majority of the current unreliability, 79 per cent of it on the TLRN in a weekday AM peak is accounted by volume of traffic and day-to-day variability in traffic demand." [3]

Private car use in London has been falling over a number of years, despite the growing population: car use as a share of all trips, has declined from a peak of 50 per cent in 1990 to a current level of 36 per cent [4], with some analysts suggesting we have reached 'peak car'. [5] This is common trend as cities grow: denser populations can support greater concentration of services, reducing the need for travel, while mass transit is the only viable solution for peak time commuter travel. [6]

However in London there has been a significant growth in commercial traffic (freight and construction traffic). Light goods vehicles (delivery vans) now make up 13 per cent of all motorised urban traffic. [7]

In addition, INRIX attributes growth in congestion to the impact of major planned roadworks, citing a 362 per cent increase since 2012. This is reflected in the latest TfL monitoring report on the Lane Rental Scheme.

3. What impact does congestion have on Londoners, the city's economy and its environment?

The annual cost of congestion estimated the annual cost to London as $8.5bn (£6.4bn), rising to $14.5bn (nearly £11bn) in line with expected population growth if congestion is not addressed. [8]

Longer and unreliable journey times have obvious disadvantages for travellers, and specifically for time-sensitive journeys such as customer deliveries, with a perverse incentive for companies to deploy additional vehicles to meet deadlines, thereby contributing to worsening congestion.

Non-essential traffic adds to congestion, impeding the performance of essential road users. The London Ambulance Service has performance targets to reach 75 per cent of Category A calls (critically ill patients) within eight minutes: in 2015-16 they achieved 63.81 per cent in the target time.[9]

Idling traffic also contributes to London's lethal and illegal levels of air pollution: many of the measures to address congestion will also have a beneficial effect on air quality.

4. What can London learn from other cities in its effort to reduce congestion?

London has led the way in a number of approaches, including the congestion charge, smart ticketing for public transport, on-street bike hire, and lane rental for road repairs.

Equally there are many examples, from which London could learn, highlighted in this paper, including:

- Nottingham: Workplace Parking Levy (see q8)
- Milan: combined EcoPass for congestion charge/ULEZ (see q7)
- Liverpool: integrating public transport in retail developments (q13)
- New York: dedicated cycle lanes to reduce congestion (q18)
- Netherlands: 'Minder Hinder' approach to managing roadworks (q17)
- Brussels: congestion reduced through investment in rail (q13).
- Paris: consumer freight by rail (q9)
- Utrecht: water-based logistics (q9)

[1] INRIX 2015 Traffic Scorecard http://inrix.com/scorecard/
[2] TfL Traffic in London Report 8 http://content.tfl.gov.uk/travel-in-london-report-8.pdf
[3] TfL Roads Task Force Technical Note 11 http://content.tfl.gov.uk/technical-note-11-to-what-extent-is-congestion-and-unreliability-on-the-road-network.pdf
[4] David Metz: Traffic congestion in London http://peakcar.org/traffic-congestion-in-london/
[5] Professor Phil Goodwin: Peak car: evidence indicates that private car use may have peaked and be on the decline http://www.rudi.net/node/22123
[6] David Metz: Travel in the twenty-first century http://peakcar.org/travel-in-the-twenty-first-century/
[7] Cabinet Office (2009) An analysis of urban transport.
[8] CEBR The future economic and environmental costs of gridlock in 2030 http://inrix.com/wp-content/uploads/2015/08/Whitepaper_Cebr-Cost-of-Congestion.pdf
[9] London Ambulance Service http://www.londonambulance.nhs.uk/about_us/how_we_are_doing/meeting_our_targets.aspx

- Gothenburg: Smart city approach (q19)

Charging for road usage

5. How effective is the Congestion Charge? How should this scheme be modified?

The Congestion Charge is a vital part of managing traffic in London. Without it, current levels of congestion on the road network would almost certainly be far worse. However, the Charge is now less effective than when first introduced and as TfL figures show, it is now managing traffic growth rather than deterring it.

It is important to keep the Congestion Charge under review to ensure that its pricing level is appropriate, and to ensure that it is collected efficiently. We support the case made by TfL that diplomatic vehicles should pay the charge.

We note that the argument is sometimes made that such charges would discriminate against lower income users, as any fixed charge is inevitable regressive in nature. However it is important to note that the lowest income Londoners are both least likely to own or have use of cars, and are most likely to suffer the ill effects of air pollution. London pensioners, people with disabilities, young people and other groups also have free or discounted access to public transport, reducing their need for car use.

It may be appropriate to add additional Congestion Charge zones within London, not necessarily adjacent to the central London zone, in response to specific local need: for example, a congestion charge for Heathrow Airport. However, we believe that other options explored in this consultation – usage-based road pricing and workplace parking levies – provide even more effective options.

6. To what extent would a usage-based road pricing regime help reduce congestion?

Owning a car in London is an expensive choice: on average £3k a year to own and £18.88 per hour driving to operate. [10] Owner-drivers make a high cost investment in their vehicle, including purchase price, tax, insurance, depreciation and parking, but, fuel apart, do not pay per use: the greater the number of trips, the smaller relative cost per trip to the user. This contrasts with the 'pay as you go' model of car clubs, taxis and public transport.

In utilitarian terms, individual motor vehicles are highly inefficient users of road space, compared with buses, cycling or walking, yet there is no financial reward or incentive on travellers to make that choice. In addition, the lack of a 'pay as you go' model for road transport means that motor vehicles do not pay the cost of their impact in terms of carbon emissions, air pollution or road maintenance. Road user pricing reflects the principle that those who contribute to congestion and environmental problems should help pay for the costs to society this causes.

A usage-based regime moves closer to the concept of 'mobility as a service' where travellers make smart choices for each journey based on convenience and price, rather than being invested in a single mode.

Past surveys indicate that there is public acceptance of road pricing measures, provided that the scheme tackles congestion and the proceeds are seen to be reinvested in sustainable transport alternatives.[11]

The case is sometimes made that road use charging will unfairly impact lower income households. The evidence of car ownership in London shows that the poorest households will not be the most impacted, because they are least likely to have cars. 46 per cent of London households do not have a car, and the general trend is for household car access to rise as household income increases. Car ownership is lowest in the lowest income households, with a majority of households at or below London Living Wage income having no car. Car ownership is higher amongst men than women (46 per cent compared to 34 per cent). This gap is greater in lower income households. [12]

The introduction of the emissions surcharge and ULEZ charging, combined with existing congestion charges and other charges, makes the case for introducing a vehicle passport for London. By combining the various

[10] Zipcar research on car ownership costs January 2016 http://www.zipcar.co.uk/press/releases/zipcar-research-on-car-ownership-costs

[11] IPPR Charging Forwards 2006 http://www.ippr.org/publications/charging-forwarda-review-of-public-attitudes-towards-road-pricing-in-the-uk

[12] TfL Roads Task Force – Technical Note 12 How many cars are there in London and who owns them? 2012 http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf

charges, and with potential to incorporate Vehicle Excise Duty, parking charges and other insurance and licensing costs; this could see London lead the way in smart road user charging just as the Oystercard led the way in smart ticketing.

It would enable London to tackle both pollution and congestion in a smart and transparent way, while generating vital revenue for greener transport alternatives.

7. How might the UltraLow Emission Zone and Emissions Surcharge affect congestion levels?

The main purpose of the ULEZ is to tackle air pollution, a public health emergency that demands urgent action. London is the dirty diesel capital of Europe. Its main roads break EU legal standards on pollution every year. The legal case brought by Client Earth has added further pressure to national and local government to act. However, there are also potential benefits for congestion reduction.

The experience of cities around the world is positive.

- Rotterdam's LEZ was extended in January 2016 to affect cars and light duty vehicles, with a ban on diesel vehicles registered after 1 July 2001 and petrol and LPG vehicles registered after 1 July 1992. The impact of this scheme has been to reduce the number of severely polluting cars by half. [13]

- Milan's combined congestion charge and LEZ (Ecopass) saw incoming traffic fall by just over 30per cent while during operating hours, public transport operating speed increased by 5.7per cent for buses and 4.7per cent for trams. [14]

We support the early introduction of a wider Ultra Low Emission Zone and its extension to the North and South Circular initially, with potential to extend it further. The Mayor's proposal for bringing forward the ULEZ to September 2019 from 2020 is welcome but we believe could go further and faster.

We believe that both light and heavy vehicles should be ULEZ-compliant; we agree that the ULEZ should extend, as a minimum, to the North and South Circular Roads, and should be extended to cover London as a whole as soon as practicable. Charging goods vehicles will deter some vehicles from entering the zone, and encourage consolidation of trips by others.

Funding from the proposed "t-charge" and an expanded Ultra Low Emission Zone could contribute to the cost of modernising London's bus and taxi fleets, making them an even more attractive alternative mode. [15]

8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure

We do not support the introduction of new road-based river crossings as a congestion reduction measure: the evidence is that new roads generate new traffic, and simply add to congestion on feeder routes.

Tolls may be seen as necessary to pay for the road and to manage demand, but neither outcome is certain. The experience of toll roads, notably the M6 toll, is that drivers seek alternative untolled routes where available, undermining the business case: and where there is no alternative, tolls are no deterrent to traffic (as with the Dartford Crossing). [16]

In the case of the proposed Silvertown Crossing, the Preliminary Charging Report indicates that the proposed user charging will not reduce demand at peak times, with a majority of businesses consulted being happy to pay the charge. [17] If the aim is to use a toll to manage demand, then existing crossings could have tolls introduced, without the expense and disruption of constructing additional crossings.

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[13] ELTIS: New Rotterdam LEZ halves dirty cars in a month http://www.eltis.org/discover/news/new-rotterdam-lez-halves-dirty-cars-month-netherlands

[14] Milan Area C monitoring report http://www.comune.milano.it/wps/portal/ist/it/servizi/mobilita/Area_C/risultati_attesi

[15] Green Alliance: Greener London 2016 http://www.green-alliance.org.uk/Greener_London.php

[16] Campaign for Better Transport: Problems with Private Roads http://bettertransport.org.uk/sites/default/files/research-files/Problems_with_Private_Roads_FinalWeb.pdf

[17] TfL Silvertown Tunnel Preliminary Charging Report October 2015 http://content.tfl.gov.uk/preliminary-charging-report.pdf

If tolls are to be introduced, they should be applied as part of a wider package of road use pricing / demand management measures for similar routes, to avoid displaced traffic, and with pricing incentives to encourage low carbon and low emission vehicles, in line with other charging measures.

- Workplace Parking Levy

Workplace Parking Levies can reduce congestion directly, by encouraging commuters to car share or switch modes to reduce their travel costs. They can also reduce congestion indirectly, when the proceeds are invested in good quality public transport, cycling and walking facilities, which in turn reduce traffic volume.

- Nottingham's experience is a model for others to follow. Using powers under the Transport Act 2000, the City Council levies an annual charge of £375 (just over £1 a day) on each parking space provided by larger employers (those with 10 or fewer spaces and some categories of employer are exempt). The proceeds are reinvested in public transport, helping fund railway station improvements, new tram lines and city-wide bus services. [18] Despite initial reservations, the East Midlands Chamber of Commerce acknowledges that Nottingham's economy is thriving with growth in jobs and turnover: traffic levels have fallen, and the city has already achieved its 2020 carbon reduction target. [19]

London is well-placed to introduce Workplace Parking Levies. In outer London centres which are beyond the congestion charge zone, such as Uxbridge, Hounslow, Kingston or Croydon, they would provide an efficient congestion control mechanism which is currently lacking, while in Canary Wharf or the Royal Docks, they would complement existing measures in areas of intense construction activity where good public transport is already in place.

We recommend an early pilot of a Workplace Parking Levy, in partnership with supportive boroughs or Business Improvement Districts, for example in Hounslow. Such a scheme would be an important contribution to managing demand, tackling both congestion and pollution and providing a dedicated revenue stream that could be shared with boroughs, Business Improvement Districts or strategic landowners to enhance public transport and the public realm to mutual benefit.

In general, parking controls are an effective demand management measure, with knock on benefits to reducing congestion.

- City of Westminster Council has adopted a smart parking scheme to discourage the problem of motorists idling in search of parking spaces: a combination of RFID sensors on parking bays to track occupancy, with an app to locate empty spaces. Westminster is now issuing e-permits for residents' parking which can be read by the sensors, enabling efficient enforcement of parking controls. [20]

- Devolving Vehicle Excise Duty to London

The Government has announced that from 2020, Vehicle Excise Duty (VED) will be ring-fenced in a new Roads Fund, to be spent on the Strategic Road Network.

We support calls for a proportion of Londoners' Vehicle Excise Duty to be retained for spending on London's transport infrastructure. It is wrong that all the proposed Roads Fund should be earmarked for the Strategic Road Network outside London at the expense of local highways authorities across the country as well as the capital.

Whether devolving VED to London helps tackle congestion depends on how funds are used. We would encourage Roads Fund money for London to be used to help mend potholes, improve safety at junctions, and fund improved transport corridors for buses, coaches, pedestrians and cyclists, in line with the Government's Cycling & Walking Investment Strategy. Such an approach would contribute to a better environment for Londoners by improving safety and air pollution, as well as reducing congestion.

[18] Tracks: Workplace Parking Levy Briefing http://cbtthoughtleadership.org.uk/WPL-Briefing-Nottingham.pdf
[19] CityMetric: Why other cities should copy Nottingham's revolutionary parking levy August 2016 http://www.citymetric.com//transport/why-other-cities-should-copy-nottinghams-revolutionary-parking-levy-2382
[20] Westminster Smart Parking http://www.smartparking.com/keep-up-to-date/case-studies/city-of-westminster-london-uk

Measures to target specific types of vehicle

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Freight vehicles are a major element in congestion, with TfL figures indicating that a third of vehicles in the morning peak are making freight-related journeys. We support TfL's policy to encourage the use of consolidation centres as a way to reduce adverse impacts of freight distribution and highlight the benefits of connecting rail sites, where possible, and thus using rail for long distance trunk haulage and lower emissions road vehicles for final deliveries.

Tackling the growth of Light Goods Vehicles for deliveries, particularly for retail fulfilment, is a crucial element of controlling congestion in London.

Online purchasing has grown from 9.4 per cent of the UK retail market in 2010 to 16.8 per cent in 2016. Unlike shopping in person, there is no incentive to combine purchases in a single delivery and there is a negative cycle of delivery companies deploying additional vehicles to achieve contracted delivery times, thereby worsening congestion. To address this, we advocate an accelerated rollout of smarter last mile delivery and area-wide servicing plans, to co-ordinate delivery times and promote shared use of vehicles.

The 'Total Transport' concept of co-ordinating shared use of vehicles from different public sector providers could be applied to delivery vehicles operating in particular areas. There is growing interest in sharing apps which can partner empty vehicles with freight to make best use of return trips: TfL could act as an honest broker to assist smaller businesses to access such services.

Encouraging the use of local and hyper-local consolidation hubs for neighbourhoods, housing estates, town centres, or business districts, is a cost-effective approach to manage deliveries, which, combined with the use of ultralow or zero emission last mile delivery vehicles (for example cargo bikes or electric shuttles), addresses both congestion and pollution.

- In Gothenburg, the City Delivery scheme provides a central HGV terminal from which city centre deliveries are completed by electric van and delivery bikes. [21]

- In London, Regents Street has pioneered a similar approach, with a consolidation centre outside the congestion charge zone where multiple deliveries are transferred to electric vehicles for scheduled delivery: the scheme has seen an 80per cent reduction in retail lorry movements. [22]

Employers can play a role by discouraging workplace delivery of personal shopping: some large organisations report that around a third of the deliveries made to their central London offices are private deliveries from on-line shopping.

Any plan for tackling congestion must include making better use of rail and water for longer distance freight. Water has particular potential for aggregates and waste transport, with the Port of London Authority hosting 70 independent terminals on the river with capacity to handle more than 40 million tonnes of cargo between them. [23] The Waterway365 project based in Sweden provides guidance on using inland waterways for public transport and urban deliveries [24] while in Utrecht, an established electric delivery boat service operates for canal side businesses. [25]

There is great potential for consumer rail freight to be transported in London in a safer low carbon mode which reduces road congestion and air pollution.

- Two important trials have brought trainloads of freight into Euston at night when the station is closed for passenger services, then transferred to electric or low emission delivery vehicles.

[21] City of Gotenburg Urban Logistics http://forlivochrorelse.se/en/sustainable-transport/urban-logistics/
[22] Arup Regent Street delivery and servicing reduction scheme http://www.arup.com/projects/regent_street_delivery_and_servicing_reduction_scheme
[23] POLA Handbook 2015 https://pla.co.uk/assets/plahandbook2015.pdf
[24] Waterway 365 http://waterway365.com/
[25] Civitas 2020 City distribution by boat http://www.civitas.eu/content/city-distribution-boat

- A similar approach has been adopted by Monoprix in Paris. Products are brought by rail from suburban warehouses to the Paris-Bercy freight facility, and low emission gas-powered delivery vehicles complete delivery to 90 Monoprix stores across the city.[26]

There is suppressed demand for rail freight due to lack of capacity on the rail network. As TfL sets out overarching spatial planning as well as transport planning across the capital, it is imperative that it gives the boroughs clear guidance on the need to protect future potential sites for rail freight interchanges of all sizes.

On already busy roads, HGVs have far greater impacts on traffic flow as they need longer braking distances, and longer times to manoeuvre, especially in urban areas.

Longer and heavier lorries (currently being trialled outside London) should be banned from the capital and any HGVs entering London should be required to have full visibility cabs. In addition to taking up large amounts of road space, extended turning areas and poor visibility combine to threaten other road users, in particular pedestrians and cyclists, which is at odds with policies to encourage more active travel.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

The INRIX congestion report indicates that levels of car traffic, including private hire vehicles PHVs), are falling and that it is therefore incorrect to attribute a rise in overall London-wide congestion to minicabs. There is however evidence of local congestion hotspots caused by concentrations of PHVs and we think these hotspots need monitoring and possibly regulating.

There are also wider concerns about the impact of the growth of minicabs on other, more sustainable travel options, in particular the impact of pool car services on the viability of the night bus service.

We are neutral on the question of whether TfL should cap the number of private hire vehicle licences: occasional access to cab services is important for people without cars, but overall promoting non-car based alternatives should be the policy priority.

If such a cap were to be implemented, it should be on a per borough basis, to maintain a network of local provision within a London wide cap. This could be varied to reflect levels of access to public transport in the boroughs concerned and scaled down as public transport options improve. Licences should also be used to incentivise uptake of low carbon and low emission fuels – although these do not in themselves reduce congestion.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Car clubs are valuable in tackling congestion as they provide an alternative to individual car ownership, and operate on a pay as you go basis, encouraging more targeted usage. CarPlus, the car club industry body, reports that as of May 2016, there are 186,000 car club members in London, using 2,800 cars: they calculate that over 25,000 privately owned vehicles have been removed from the roads as a result of car club membership. [27] In addition LGV options reduce costs for and congestion from the growing small business sector.

Parking is the major challenge for car clubs: prioritising car clubs for parking places makes car clubs more attractive and also helps control private car parking by reallocating road space. In Tower Hamlets, electric charging points for car club vehicles have been provided within local authority housing estate car parks. The Mayor and TfL have a range of tools to encourage car club parking provision, including through planning requirements; requiring provision for car clubs in TfL-funded traffic management and/or parking schemes; on TfL land and through exemption from future workplace parking levies.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

[26] PTEG Delivering the future report http://www.urbantransportgroup.org/system/files/general-docs/Delivering%20the%20future%20FINAL%20020315.pdf
[27] CarPlus 2016 Annual Survey of Car Clubs in London http://www.carplus.org.uk/wp-content/uploads/2016/04/Carplus-Annual-Survey-of-Car-Clubs-in-London-A4-AW.pdf

Buses play a vital role in reducing congestion: every three buses replace approximately 200 cars on the road. They are high capacity, flexible, and provide far wider coverage than any other public transport option. We advocate regular audits of London's 'public transport deserts' to ensure there is appropriate bus coverage, including community transport options.

However, there is evidence that congestion is now impairing bus performance to the point where passengers are switching away from bus usage, with bus speeds declining faster in London than anywhere in the UK.[28]

TfL should continue to roll out dedicated bus lanes and bus priority at junctions, and review signalling at existing junctions with high bus usage. Bus lanes are part of the solution to congestion, not part of the problem. Dedicated bus lanes can reduce bus travel times by 7 to 9 minutes along a 10km congested route and also improve their reliability.

The introduction of cycle routes need not undermine bus efficiency any more than dedicated bus lanes undermine that of other vehicles, provided good design principles are followed. Both bicycle and bus use help reduce congestion, and having separate lanes reduces the risk of conflict between the two modes.

Good quality bus information and flexible ticketing are important to maintain and increase bus usage. We welcome the introduction of the bus hopper ticket and would encourage TfL to introduce a part-time travel card to benefit the many Londoners who work flexible hours.

Encouraging modal shift

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

We have outlined a number of solutions in this paper, including use of workplace parking levies and road user pricing to deter unnecessary vehicle use.

Provision of better public transport, walking and cycling options that are accessible, reliable and affordable has a direct, beneficial impact on reducing traffic and congestion. For example, Brussels has seen congestion levels fall from being ranked as Europe's most congested city in 2012 and 2013 following investment in expanded suburban rail services.

This includes providing dedicated space for walking and cycling, and flexible ticketing options for public transport that provide fair fare options for part-time workers.

In addition, land use planning and parking management pay a critical role. London's housing crisis is well known: using land to house cars rather than people is woefully inefficient, and fosters greater car dependency, reinforcing social and economic exclusion for people without access to a car.

A number of boroughs now have policies requiring new residential developments to be 'car-free', delivered by a combination of legally binding planning conditions, through property lease rules and/or exclusion from residents' parking permit schemes. This model is recognised in the 2016 London Plan and could be rolled out to other boroughs.

Concentrating new residential development close to public transport, including on TfL and GLA owned land, has the opportunity to deliver more affordable housing, and also reduces car dependency. In areas with a low PTAL, the emphasis of planning policy should be to secure developer contributions for enhanced public transport, rather than simply relaxing parking controls.

The South Yorkshire Passenger Transport Executive has developed a refinement of PTAL with a traffic light classification system known as LUTI (Land Use and Transport Integration). This scores development sites as red, amber or green according to their accessibility by public transport to assist developers in ensuring that sites are well served by public transport or, if not, that the necessary provision can be made. [29]

[28] The Impact of Congestion on Bus Passengers http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

[29] Campaign for Better Transport: Getting There How sustainable transport can support new development 2015 http://www.bettertransport.org.uk/sites/default/files/research-files/Getting_there_final_web_0.pdf

Through the London Plan, planning for new event venues and retail areas can require a move away from car-based travel.

- The Liverpool One shopping centre was designed to incorporate a new bus interchange. In 2013, Liverpool One's car parks received 1.6m cars, while 14m passengers arrived in the city centre by bus during the same period and Liverpool One bus interchange saw a 66 per cent rise in passengers on the previous year. [30]

There is also the opportunity to work with key retail/leisure destinations to incentivise modal shift, for example combined transport/admission tickets for sports and arts events. A consistent policy of including local or regional public transport free with event tickets - similar to the German 'Kombi Ticket' - would have wide benefits. [31] London's successful 'Get ahead of the Games' initiative from 2012 showed how additional road congestion from events can be managed and this approach could be extended to more regular events.

TfL and boroughs are well-placed to work with employers, schools and other destinations to support better travel planning and information to encourage smarter travel choices, in particular targeting single occupancy car use.

- The London Borough of Sutton saw traffic levels reduced by 3.2 per cent through the Smarter Travel Sutton programme which combined travel planning for larger employers and in every school with personal travel advice promoted through events and a touring roadshow, complemented by launching a car club and providing additional cycle parking and cycle training. [32]

Providing new road infrastructure

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

No. New roads cannot help reduce congestion: on the contrary, new roads generate new traffic. This 'induced traffic' effect is well-known: the real or perceived benefit of using the new road attracts additional traffic. This comes in the form of 'triple convergence' – people switching to the new road from other times, other routes and other modes, to the point where levels of usage and congestion eventually reach or exceed their former levels. [33]

The additional traffic does not evaporate at either end of the new road: additional traffic will add to congestion on existing roads, pressure on parking, and adverse environmental impacts. We cannot build our way out of congestion: it can only be tackled by reducing traffic through more efficient use of transport.

While we understand and support the aims to improve regeneration and connectivity in east London, this is better achieved through managing demand on existing roads and investing in better public transport, walking and cycling instead.

The Mayor and Transport for London should instead take a leadership role in transforming London's road network for the better, engaging with Highways England to challenge plans for new roads that will increase congestion in London.

There is a great opportunity to right some of the wrongs of the past where badly designed roads have created severance in London's communities: investing in improving crossings, removing gyratories and enhancing interchanges with public transport would be a much more sustainable long-term solution to tackling congestion.

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[30] Mayor of Liverpool: Liverpool City Centre Main Retail Area Review June 2014 http://www.liverpoolvision.co.uk/wp-content/uploads/2014/07/ Liverpool-City-Centre-Main-Retail-Area-Review-June-2014.pdf

[31] Campaign for Better Transport: Door to turnstile Improving travel choices for football fans http://www.bettertransport.org.uk/sites/default/files/research-files/Door_to_Turnstile_CfBT_FINAL_web.pdf

[32] Smarter Travel Sutton http://thensmc.com/sites/default/files/Smarter%20Travel%20Sutton%20FULL%20case%20study_0.pdf

[33] Sorensen, Paul, et al. Reducing Traffic Congestion in Los Angeles. Santa Monica, CA: RAND Corporation, 2008. http://www.rand.org/pubs/research_briefs/RB9385.html.http://www.rand.org/pubs/research_briefs/RB9385.html

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

The risk that additional traffic will be stimulated is real and has been seen on existing new road schemes, such as the widening of the M25 and the increased capacity at the Dartford Crossing.

Across the country, post-opening evaluation reports produced on major road schemes demonstrate that traffic levels on both the new and the existing road network grew once "bypass" routes had opened. [34]

The risk can only be avoided by dropping plans for expensive and damaging new road plans, such as the proposed Silvertown Tunnel, and investing instead in sustainable alternatives, such as the dedicated walking/cycling bridge proposed to connect Rotherhithe to Canary Wharf, or new Overground connection to Barking Riverside and across to Abbey Wood.

There is however potential for a new approach to investing in redesign of existing road infrastructure, for example removing gyratories, improving the quantity and quality of public realm, with provision for cycling and bus routes, as part of a comprehensive traffic reduction approach.

16. How should new road infrastructure be funded?

The proposed Silvertown, Gallions and Belvedere road crossings are estimated at £1bn each. We urge that these road schemes are dropped and the funds identified be invested in the sustainable transport and demand management approaches outlined in this paper instead.

Ongoing demand for new homes and workspace in London will see more unused brownfield sites being developed. There will be instances where new local access roads are required to bring these sites into use. In these cases, there should be a developer contribution to the construction cost of the new roads, allied with contributions for sustainable transport.

Examples include contributions from a hotel developer to providing step free access at Tower Hill tube [35]and contributions from the redevelopment of Battersea Power Station to new tube provision.

Maximising available road space

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

The Lane Rental scheme levies a charge on road works at peak times in key locations on TfL roads, with higher charges at pinch points. Revenue is reinvested in traffic management infrastructure such as the rollout of ANPR. We support the principle that operators should pay a contribution reflecting the impact of their work on the road network and incentivising working at the least disruptive times.

TfL's monitoring reports show that the Lane Rental Scheme had a significant impact in reducing congestion caused by roadworks in its first two years of operation (2012-2014). The scheme coverage was later reviewed with fewer roads included. The most recent report (2014-15) shows that journey time reliability has deteriorated across the network, including areas where the Lane Rental Scheme is operating, reflecting the overall growth in traffic. [36]

The scheme should continue to be reviewed to ensure that priority routes, in particular bus routes, are included. To be made more effective, the scheme could be extended through partnership working and better co-ordination to borough roads, with the aim of avoiding simultaneous works on parallel routes.

TfL could consider adopting the Dutch 'Minder Hinder' approach: this holistic approach to managing major roadworks includes publicising and incentivising alternative modes as well as alternative routes and working

[34] Campaign for Better Transport: Bypasses don't work http://www.bettertransport.org.uk/roads-nowhere/bypasses-dont-work
[35] Transport for All: Tower Hill becomes the 68th step-free Tube station in London http://www.transportforall.org.uk/news/tower-hill-becomes-the-68th-step-free-tube-station-in-london
[36] Transport for London Lane Rental Scheme Monitoring Report – July 2014 to March 2015 http://content.tfl.gov.uk/lane-rental-monitoring-report-july-2014-mar-2015.pdf

with major employers and attractions nearby to stagger arrival times and provide discounts for customers using public transport. [37]

In addition to roadworks, there is a significant impact from construction sites taking over parts of the public highway. There is an important role for boroughs and the Mayor in his planning role to play in enforcing the Considerate Constructors Scheme as part of all planning consents.

TfL and boroughs should be rigorous in issuing, monitoring and enforcing licences for works on the highway to ensure these are only issued as a last resort and that time limits are adhered to. By better phasing of construction, developers may be able to contain more of the works within their site boundaries, and this should be incentivised by reviewing costs for highways licences.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

The environmental, economic and health benefits of walking and cycling are well established. In addition, better provision for walking and cycling is effective in tackling congestion.

It is sometimes argued that reallocating road space from motor traffic for walking and cycling will increase congestion. The opposite is the case. The FLOW project studied the impact of walking and cycling in reducing congestion looking at twenty schemes across eighteen EU cities and New York. Ten of the schemes reduced congestion, eight were congestion-neutral: only two schemes increased congestion. [38]

- In the case of dedicated cycle routes introduced in New York, key routes saw improved traffic flow as a result of modal shift reducing the number of cars, combined with safer and more efficient junctions: for example, travel times on 8th Avenue improved by an average of 14 per cent. [39]

We strongly support measures to extend pedestrianisation to London's high streets, including Oxford Street, and local centres, along with improved networks of walking and cycling routes between local centres and across central London. This must be co-ordinated with bus route planning and design to deliver an integrated public transport system that complements active travel options.

On roads with traffic, locating crossings at 'desire lines', improving pedestrian crossings with "all green" phases and providing crossing time countdowns, all facilitate pedestrian movement in a way that reduces conflict with motor traffic. The initial trial of crossing time countdowns in London showed reduced traffic queues as well as improved pedestrian safety. [40]

Borough level 20mph zones help tackle congestion by improving the capacity of existing roads, in addition to their proven safety and environmental benefits.[41]

Active traffic management
19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?
20. How effective has the Road and Transport Enforcement team been in tackling congestion?

Technology offers a range of solutions to congestion: real time information and smartcards make sustainable modes more accessible and attractive, while big data can assist in traffic management and transport planning.

- Gothenburg has adopted a comprehensive Smart City approach, using a range of apps to manage electric bike hire schemes, low emission delivery vehicles, as well as sharing data with private sector

[37] Learning From The Dutch: Improving Customer Experience During Roadworks http://www.highways-uk.com/content/huk/docs/ib1-improving-customer-experience-during-roadworks.pdf
[38]FLOW The Role Of Walking And Cycling In Reducing Congestion A Portfolio Of Measures http://h2020-flow.eu/fileadmin/user_upload/FLOW_REPORT_-_Portfolio_of_Measures_v_06_web.pdf
[39] New York City Department of Transportation (2014). Protected Bicycle Lanes in NYC. http://www. nyc.gov/html/dot/downloads/pdf/2014-09-03-bicyclepath-data-analysis.pdf
[40] Transport Research Laboratory (2011). Pedestrian Countdown at Traffic Signal Junctions (PCaTS) - Road Trial http://tfl.gov.uk/cdn/static/cms/documents/ PCaTS-Note-3-PCaTS-Trial-Results-Report.pdf.
[41]20's Plenty: 20mph Limits Save Time And Improve Traffic Flow http://www.20splenty.org/20mph_limits_save_time_and_improve_traffic_flow

partners to deliver integrated transport such as electric buses and park & ride services across neighbouring local authorities. [42]

Modern traffic technology and effective enforcement of highways rules will continue to play a role in managing congestion. Examples of how technology can assist are found across all modes.

- For freight, sharing apps increase the use of empty capacity on return trips for backloads.
- Bus priority measures that maintain bus service reliability, combined with real time travel information apps, are a vital part of promoting public transport and reducing congestion.
- Westminster's Smart Parking scheme uses RFID sensors to detect parking infringements.

We commend the work of the Smarter Travel Forum, which brings together a range of transport and technology industry partners to develop solutions, for example, making use of mobile phone traffic patterns to help model transport demand. [43]

London as a leading tech city is well-placed to harness and deploy emerging technology and the appointment of a Director of Innovation is a welcome move.

Conclusion

In summary, we propose a combination of traffic demand management through introducing measures such as workplace parking levies, road user pricing, smart freight solutions, and using land use planning to move away from car dependency.

We oppose the expensive fallacy that we can build our way out of congestion with new roads, and call for an immediate end to plans for new road-based river crossings in east London: instead, we advocate investing the substantial sums currently allocated for these new roads, together with a fair share of London's VED income, in better walking, cycling and public transport options.

We believe such a package of measures would have wider social, health, environmental and economic benefits for London as a whole, and help make our capital a model of liveable 21st century cities.

September 2016

Stephen Joseph & Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428

[42] OptiCitiesGothenburg http://www.opticities.com/pilot-cities/gothenburg/
[43] Smarter Travel Forum http://www.bettertransport.org.uk/smarter-travel-forum

Cargobike Life CIC

From: [redacted]
Sent: 02 August 2016 19:20
To: Georgina Wells
Subject: Fwd: Response to Investigation into traffic congestion in London

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Many European studies have shown that a substantial percentage of van trips can be substituted by cargobikes.

In order to facilitate a substantial modal shift away from vans to cargobikes, the introduction of micro-consolidation centres in the most congested areas will have several advantages:

- efficient transhipments
- trusted operator for last mile
- depots for parts for servicing contractors

I am one of the most knowledgeable person in the UK about cargobikes and I am happy to assist.

Regards,

Andrea Casalotti
[redacted]

Cargobike Life CIC
http://cargobikelife.co.uk

Carplus Evidence submission to the London Assembly Transport Committee – investigation into traffic congestion, September 2016

Carplus and Bikeplus promote accessible shared transport including car clubs, shared bikes and 2+ car sharing.

We work to change the way people travel to reduce the environmental impact of transport and improve access to transport for all. We do this by supporting and encouraging measures that promote car clubs, car sharing, bike sharing and other shared mobility schemes which complement public transport, cycling and walking to provide affordable and flexible travel. For further detail please see our website www.carplus.org.uk.

Over the past eleven years Carplus have developed an independent evidence base about the wide ranging benefits of car clubs, through an annual survey of car club members across the UK. This is the only industry-wide dataset collected with the co-operation of the car club operators. The sample size for 2015/16 was 4,124 round-trip members in London and 1,124 flexible members. The key value of its analysis of outcomes and impacts is its impartiality; In recent years, the survey has been funded principally by TfL, DfT and Transport Scotland.

The 2015/16 survey included for the first time analysis of effects of the flexible/one-way car club model currently offered in London by DriveNow and GoDrive.

We have provided below evidence both from the Carplus annual survey of car clubs 2015/16 and also from other research that we are aware of that has been undertaken in both European and North American cities on the impacts of car clubs. The Carplus annual survey can be downloaded from our website http://www.carplus.org.uk/tools-and-resources/annual-survey-of-car-clubs/.

If you would like any further details, please do not hesitate to contact me – [redacted]

How can car clubs help reduce congestion?

There are currently 205,500 car club members in London, with access to over 2,800 vehicles. Two operational models are present: round-trip car clubs – where members pick up a vehicle from a dedicated bay and return it to the same bay; and flexible car clubs where members use an app to find the nearest available vehicle within a specific zone. At the end of their journey they park the vehicle anywhere allowed within the same zone.

There are several ways in which car clubs can contribute towards reducing congestion:

1. **Encouraging travel behaviour change**

When members join a car club several behaviour changes start to happen *as a result of them joining*:

a) **They use their own car less**

The annual survey suggests that the average change in longer-term member annual mileage for round-trip members after joining a car club is a decrease of 729 miles. Members of flexible car clubs report a reduction of 840 miles per year.
Members also make fewer trips by car – before joining a car club, 22% of new round-trip members travel by car as a driver at least once a week, falling to 17% after joining. Amongst new members of flexible operations, 32% travel by car as a driver at least once a week, falling to 29% after joining.

b) **Members use public transport, walk and cycle more often.**
This is often because they are recognising the real monetary cost of each car club journey and realise that public transport, walking and cycling are cheaper options (particularly if they do not have access to their own vehicle).

c) **Many members choose to give up a car.**
The annual survey suggests that in 2015/16 before joining a car club 42% of members owned at least one car, compared with 24% after joining (an 18% reduction in car ownership). In London, for each car club car we know that 10.5 cars have been sold or disposed of. Across London as a whole this equates to an annual reduction of 25,500 private cars removed from the roads.
Comparable figures from Seattle suggest that one in eight members use a car club instead of purchasing their own vehicle. This has reduced the number of cars in Seattle by about 4,500[1].
In London, car club membership also has an influence on future car purchase – 32% of members said that they would have bought a private car if they had not joined a car club.
So car club membership can help to reduce the number of cars on the roads and also discourage members from planning to purchase a vehicle in the future.

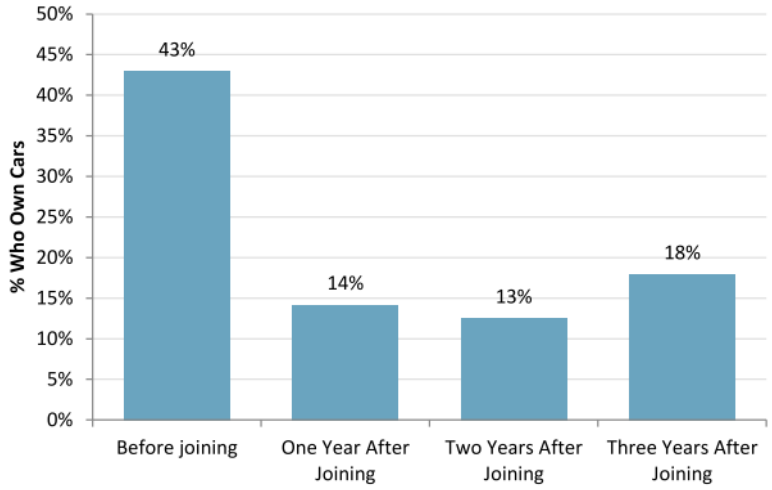
2. Enabling people to continue to live without a car (or reduce their car ownership)
Car clubs give members access to a car for the occasional journeys when they need one – for example 51% of members reported transporting bulky goods on their last car club journey, or for journeys where the member was going to more than one place (trip chaining) where using public transport would not be an option. Car club vehicles are typically used outside of the morning and evening peaks and do not therefore add to rush hour congestion in London.

We have recently undertaken analysis[2] of member behaviour over the longer term which demonstrates that long term car club membership maintains lower levels of car ownership over time (see Figure 1). Long term car club members' average annual car club mileage is also consistently lower over time than the national average.

[1] Seattle Department of Transportation 2015 annual free-floating car share member survey http://sdotblog.seattle.gov/2016/03/04/seattle-car-share-program-update/

[2] Carplus Annual Longitudinal Survey Analysis July 2016 – Steer Davies Gleave, unpublished.

Figure 1 – Car ownership before and after joining a car club[3]



Sample size: 240 respondents

We are currently undertaking a more detailed piece of work that will enable us to look at car ownership and travel behaviour of car club members over time using a much larger sample size. We plan to publish this report in October 2016.

3. **Car clubs promote more efficient use of resources and space**
   Vehicle occupancy in car club cars tends to be higher than when people make a journey in their own vehicle. The Carplus annual survey suggests that in London, occupancy of car club cars is on average 2.5 people, compared with the London average of 1.6 people per car. Car club cars are also used far more intensively than private vehicles (they are in use for an average of 25% of the time, compared with an average of 5% for private cars.) If a total of 25,500 private cars are removed from the road across London this enables road space to be freed up for other uses (particularly in residential areas) including play space, planting of trees and provision of cycle parking.

We would suggest that car clubs alone cannot solve congestion problems in London but that they should be part of an integrated package of measures promoted by TfL to help tackle congestion.

What can the Mayor and TfL do to increase the impact of car clubs?

These comments are priorities based partly on the London Car Club Strategy[4]. The Strategy comprises 10 recommendations that should be considered alongside these comments.

[3] Carplus Annual Longitudinal Survey Analysis July 2016 – Steer Davies Gleave, unpublished.

[4] www.carplus.org.uk/projects/developing-car-clubs-in-london/

1. ***Raise awareness of car clubs as a mainstream travel choice***, by
    a. fully integrating car clubs into the TfL Oyster account and data platforms and
    b. actively communicating and promoting car clubs as a part of 'smart travel'.
    c. develop and use a roundel for car clubs that would help to raise awareness and strengthen links between car clubs and other TfL modes.
2. ***Promote the development of a competitive market in EV car clubs***
   This requires a transparent, fair and properly regulated access to charging infrastructure.
3. ***Embed car clubs into TfL's development of Mobility as a Service (MaaS)***
   MaaS provides a natural home for car club services – and car clubs *already* provide mobility services that can form a significant part of MaaS.
4. ***Promotion of a London-wide diesel scrappage scheme for cars***
   This would help to encourage more people to give up a vehicle and provide the opportunity to promote car clubs to them at the point at which they sell / dispose of a vehicle.

Congestion in London – Consultation Response

CPT is the trade association for the bus and coach industry, recognised by Government, TfL, local authorities and international organisations. The organisation represents over 70% of the passenger carrying vehicles on UK roads.

CPT members have regularly expressed concern about the increase in congestion in London, both in terms of financial cost and its effect on tourism. London competes on a global scale for business and there are growing concerns that the difficulties the industry faces in providing a product, which meets customer's demands, may ultimately result in that business, being diverted to other destinations.

The following observations are from our member's experience of operating coaches and buses in London, primarily those which operate independent of the TfL network.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Amount of congestion:

Undoubtedly congestion has increased and is costing London financially in terms of poorer air quality and general degradation of life in the Capital.

Times of congestion:

The frequency of congestion has undoubtedly increased, the norm over time has been that peak periods are particularly acute but this pattern has shifted to cover a much greater proportion of the day, both weekdays and weekends in the most affected areas – Embankment, Victoria, Piccadilly, Haymarket, Trafalgar Square, Strand, Fleet Street, Ludgate Hill, London Bridge.

Type of congestion:

CPT members suggest that there is little difference in the type of congestion; it all leads to lower speeds, increased journey times, reduced efficiency for all transport and significantly increased costs.

Location:

The locations are broadly similar to those areas which have suffered in the past, the worst affected are noted above, but the new "hotspots" are where there have been significant developments which have brought increased traffic, both in the construction phases and post-completion. This is particularly acute where the developments have affected the carriageway space available, the Cycle Superhighway for instance. The Embankment corridor has been particularly badly affected as a result of this and the resultant shift in traffic attempting to avoid the congestion has affected parallel routes also.

Confederation of Passenger Transport UK
Fifth Floor Offices (South), Chancery House, 53-64 Chancery Lane London WC2A 1QS Telephone: [redacted] Facsimile: [redacted] email: [redacted]

2. What are the key causes of these changes in congestion?

a) Increased traffic:

New developments (residential and commercial), resulting in increasing employment and population have all generated additional traffic.

Increased number of licensed (and possibly unlicensed) private hire vehicles (PHVs). There is a commonly quoted figure of circa 30,000 vehicles in London, the greater proportion of which are likely to be on the road at any point in time and the highest proportion at peak times.

b) Reduced road space – development and construction, Urban realm improvements, Cycle Superhighway etc. There are any number of examples around London where these have resulted in substantial reductions in road space with the inevitable reduction in capacity.

Of particular concern is the current proposal to reduce Fleet St to a single lane in each direction.

c) Increased congestion – Congestion breeds congestion. For commercial traffic this results in:

Slower journey times and:

- *reduced efficiency*
- *more vehicles required to meet capacity requirements*
- *more congestion!*

d) Changing lifestyles – the rapid growth of on-line shopping has led to a consequent increase in the number of delivery vehicles. Similarly, the "Uber" effect has contributed to an often quoted figure of 30,000 private hire vehicles (PHVs) on London's Roads.

e) Increased prosperity – Undoubtedly the increasing affluence of those in London has led to an increase in the numbers of cars available to them, and more crucially, a greater willingness to drive in Central London despite the congestion.

f) Changing road layouts – The elimination of left and right turns on some routes has led to increased journey lengths in order to access specific locations. For example, traffic is no longer permitted to turn left from Victoria Embankment to Bridge St, meaning a detour around Parliament Square (already heavily congested) to access Westminster Bridge. Ironically this was a common route for tourist and commuter coaches exiting the coach facilities on the Embankment corridor wishing to avoid congesting Parliament Square! There are numerous examples of this around London and the CSH has resulted in many more being applied.

Similarly, we are unconvinced that the removal of gyratory systems will result in reductions in journey times and/or less congestion. CPT believes that the

increased “red light time” caused by increased number of conflicting traffic movements at many of these locations, for example Kings Cross, will inevitably increase the time traffic is standing and result in further congestion and a deterioration in air quality.

3. What impact does congestion have on Londoners, the city’s economy and its environment?

Impact on Londoners – Congestion undoubtedly reduces everyone’s quality of life – increased noise, increased emissions, poorer air quality, slower travel times. This increases the time and money it takes to live a normal life in the Capital and with Central area property prices now pushing more Londoners to the fringes and beyond, the need to travel is increasing as a result so the quality of life for Londoners has to be suffering.

Economic impacts – Aside from the negative impression any prospective investors might get from a city which has ground to a halt, CPT are firmly of the opinion that the very real impact this is having on the city has barely been recognised. Much of the economic needs are time sensitive and perishable, passengers and goods need to be in a specific location at a specific time.

A typical example from our own industry where much of the activity of CPT members takes place around the tourist attractions of the Central Area:

Average Traffic speeds have declined from 8.8mph to 7.8mph between 2013 and 2015

This reduction of over 11% (TfL performance reports Q3-2013 & Q3-2015) means vehicle utilisation suffers.

It requires a corresponding increase of at least as many vehicles to meet the demands of the tourist economy in the same time.

Whilst some might suggest this provides more jobs, with a vehicle costing around £300,000, this is a huge burden on cost which is having a severe impact across all sectors of the transport industry, and indeed industry in general.

Nowhere has this been more graphically illustrated than in the commuter routes to Kent where increased journey times as a result of Cycle Superhighway have led to massively increased journey times.

In an attempt to mitigate the delays on outward journeys, additional vehicles have to be positioned at points on line of route to maintain any semblance of reliability for customers but even this often has had only limited success.

Similarly, delays for inbound vehicles cause severe hardship for customers when journey reliability is affected to such a degree. In addition, the vehicles will be scheduled to follow on to tourist related work on arrival in London, as their availability cannot be guaranteed, additional vehicles must be deployed to provide these services, which are essential to London’s tourism.

Inevitably, many customers have voted with their feet and either switched to already overcrowded rail or where this isn't viable (the coach option is both more affordable and serves areas where rail isn't an option), been forced to abandon employment opportunities in London.

Environment – As noted above, congestion contributes to

a) Emissions and air-quality
b) Noise
c) Visual impressions of the Capital.

Overall, reducing congestion can have a major impact on improving the environment across all these areas. Whilst we have serious concerns about the practicalities of latest proposals for low/ ultra-low emissions zones, we would point out that reducing the levels of emissions per vehicle is only one step which may have little effect if the number of vehicles is substantially increasing.

4. What can London learn from other cities in its effort to reduce congestion?

Whilst there is no "one size fits all approach", the measures to reduce congestion as suggested here can be adopted, both for individual areas, and on a wider strategic basis.

Road Charging – This is undoubtedly an emotive issue wherever it's proposed, one often swayed by political considerations above its practical value. The technology exists, it is undoubtedly effective but the argument of cost to commerce and its proportional impact on those of modest means often intervenes. CPT believes both of these can be equitably tackled.

5. How effective is the Congestion Charge? How should this scheme be modified?

Whilst the Congestion Charge was effective at the outset, there is a growing perception that this is no longer the case. The abandonment of the Western sector extension may have been a factor but perhaps the greatest single contributory factor is the cost has failed to keep pace with the rising levels of affluence in the Central area cost and it is now seen as a much smaller proportion of average wealth in the Capital.

Increasing the overall charge is one way to reduce the car traffic in particular but more radical measures could involve using technology to initiate a more comprehensive charging structure for road pricing based on usage/ times/ congestion levels.

6. To, what extent would a usage-based road pricing regime help reduce congestion?

Usage based charging opens the possibility of varying the cost according to the demands of the road network based on a pure economics approach – higher demand/ more traffic = higher cost. This in theory will reduce demand and therefore traffic levels. There is a danger that London becomes a haven for rich motorists if it

is priced out of the scope of the average motorist so a more equitable system based on need rather than simply the ability to pay would be more equitable.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

With insufficient numbers of Euro 6 vehicles capable of being manufactured and therefore being available in time coupled with the possibility of existing LEZ Euro 4 compliant vehicles not meeting the E4 Emissions Surcharge standards, these measures would in theory reduce the level of traffic as fewer vehicles would comply. In reality the likelihood is that to keep the economy moving, the vehicles which operate will be a mix of compliant and non-compliant. The result of this will be a less than satisfactory improvement of air quality, a substantial increase in cost which will inevitably be passed on to the consumer, reducing London's competitiveness in the international market for tourists.

8. What would be the benefits and drawbacks of these other interventions?

Tolling for river crossings or other major infrastructure

Tolling would be one means of controlling demand but CPT would favour a more equitable means based on the "need to use". Proposals to exempt certain classes of vehicle compelled to use the road network.

Workplace Parking Levy

Employers encouraging car use in London seems contradictory to making any contribution towards reducing congestion. In a city which is as well provided with public transport as London is, this seems to be even more bizarre and steps should be taken to discourage Employers from pursuing this policy.

Devolving Vehicle Excise Duty (VED) to London

Whilst control of VED for vehicles registered to the London area may appear to move some way towards a solution, it fails to address the issue of vehicles from outside London which provide such a valuable contribution to the Capital's transport infrastructure and the London economy. It is also very questionable what overall benefits this measure would actually achieve in practice.

Measures to target specific types of vehicle

Specific types of vehicle may contribute to congestion, but commercial vehicles are in London purely to perform a necessary function, there simply is no alternative to them using the roads so to target them, seems grossly inequitable and extremely short sighted. With a multitude of public transport options – buses, coaches, trains, rivers etc – all of which provide transport for tourists and locals much more efficiently than the private car, a more balanced approach would be to focus on efficient use of road space and target non-essential users, and inevitably private cars would be high on this list

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

It is beyond CPT's remit to suggest how the freight industry can be improved but the efficiency in terms of vehicle utilisation has long been cited as a reason for increasing congestion. How this can be addressed isn't something CPT is able to comment upon.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Again, it is outwith CPT's area of expertise to comment directly on this sector but as noted previously, changing technology and lifestyle has led to significant growth in PHV's which in turn has in turn led to increasing traffic volumes. As these vehicles spend a greater proportion of time on the road than off it, their road usage and the contribution to congestion can only be assumed to be significant. A system which recognises this, charges on the basis of usage and contribution to the transport network, on a passenger kilometre basis for instance, would help level the playing field.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Once again, it is beyond CPT's expertise to comment directly on the efficiencies of car clubs and sharing schemes, but anything which increases utilisation and can contribute to overall vehicle numbers on the road can only have a positive impact on reducing congestion.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

The bus network is undoubtedly under pressure to perform in line with the expectations of customers. Buses are not a significant cause of congestion in themselves, granted where journey times and traffic speeds are slower, more buses are required to maintain the required timetable frequency and wait times, but by reducing the congestion – noting all the causes of congestion - fewer buses would be required to maintain the service levels.

Encouraging modal shift

Greater use of more sustainable transport modes, particularly public transport, walking and cycling, would help address overall congestion on the network.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Encouraging public transport use has long been a priority, both in London and other urban areas, but with increasing affluence, rising car ownership and the decreasing cost of motoring, this has been a tough challenge.

Only by an equitable programme which makes public transport an attractive option – bus priorities for faster journeys, more attractive and comfortable vehicles (with Wi-fi for instance), flexible and affordable ticketing, integrated travel planning and information, making car travel more expensive, particularly in the most congested areas – can the playing field ever hope to be level. London is better equipped than any other urban area to achieve this, only in the field of private car usage does there appear to be a discrepancy.

Providing new road infrastructure

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

CPT has long supported the development of London's road network in line with needs of the Capital. Recent proposals such as the new Docklands crossings, Lower Thames crossing and the ambitious plan for an East-West tunnel link would all contribute to increasing capacity and therefore reduce congestion on overcrowded routes. They are also essential to opening up areas where development has been hindered or prevented by a lack of connectivity. Such decisions, whilst they would alleviate issues in specific areas, would not fully address the major problem, which is a lack of capacity on existing routes.

More efficient means of getting passengers and freight around London in a timelier manner are essential as is improving the efficiency of the existing routes. From a passenger perspective, buses and coaches provide an ideal solution to this.

It is notable that coaches:

- *Occupy the road space of 3.5 cars but have 11 times the carrying capacity.*
- *Typically a much higher level of occupancy than private cars or taxis.*
- *Have emissions levels per passenger/km around a third those of a car or taxi.*

Similarly buses can achieve even greater efficiencies and can offer a significant contribution to improving road space utilisation.

For new road provision, CPT would welcome any proposals which offered direct links from the major trunk arteries to the Central area, taking in those sites beyond which currently don't enjoy the best of road links. These sites would include Wembley and Twickenham. London's major problem is access to the Central area, often taking longer from the M25 than a journey of a hundred miles or more on the trunk network. Strategic corridor development would be extremely difficult and traffic levels would need to be managed if it ever came to fruition, but it is feasible for at least some of the important routes to be provided, using a combination of over and underground development and adapting existing routes. Such ideas could remove traffic essential to the Central area from the local traffic, reduce traffic flow through many suburbs and make them significantly better places to live.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Roads inevitably mean traffic, if they did not, there would be little point in having them. The evidence of a correlation between new roads directly encouraging increased traffic volumes has often been cited but most major road schemes have had little or no management measures to control this characteristic, so inevitably they come with a degree of risk. Measures such as intelligent road pricing, incorporating priorities for essential users, would discourage the possibility of traffic growth from just providing more roads.

16. How should new road infrastructure be funded?

There is a widespread belief that all road spending should be from the public purse, in the current climate, this isn't likely to be realistic, at least in the short-medium term, so all options should be explored and outside investment with user charging by all the possible means available has to be considered. CPT would reluctantly have to accept this position but would vigorously oppose charging regimes which are inequitable or didn't recognise the differential between essential users and those who use it by choice when other, more efficient options are available.

Maximising available road space

Space on London's roads is often restricted by construction work or other roadworks. TfL uses measures such as a lane rental scheme to manage this. In some cases, road space is diverted permanently for other key priorities such as cycling infrastructure or improved pedestrian space.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

CPT is familiar with the principle of lane rental but not sufficiently to comment on how successful this is or how it can be more effective. We would suggest that any development or maintenance which impacts on available road space fully recognises the importance of the particular stretch in question and takes this into account when the charges are calculated. Clearly essential maintenance to the network has to be carried out and adequate time allowed to complete this, but where this is overrun or where the road is occupied as a result of non-essential works – development on adjacent buildings, failure to maintain infrastructure etc – then any closures as a result should be charged in line with the impact this will have on the network.

Similarly, road closures for special events, particularly on major or strategic routes, cause increased congestion and cost for users. Consideration to a parallel rental scheme should be considered, with the proceeds ploughed back to schemes which directly help alleviate congestion.

CPT would also advocate extending this principle to instances where coach bays are closed for any non-essential events. This causes major inconvenience for tourists and coach operators, adding cost in the process.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

CPT readily accepts that cycling and walking have a major part to play in providing London with a sustainable transport infrastructure into the future. It is however inevitable that reducing road space, with no corresponding decrease in demand will lead to congestion. The aim has to be maximising efficiency and utilisation of road space, to dedicate 25% of road space along key routes such as the Embankment corridor to a mode which carries less than 10% of vehicles, and just a fraction of the number of travellers, doesn't equate to maximum efficiency.

Specific schemes have had a major impact on this in recent years. The Embankment mentioned not only eliminated valuable road space but eliminated 27 essential coach bays. Replacement of these bays was promised but so far only 16 have materialised, all in locations further away. This reduction in parking means that coaches have to travel further, contributing to congestion along the way, and those lost spaces has resulted in drivers having difficulty finding anywhere to park and so are forced to simply drive around until their return times, which is a further totally unnecessary contribution to congestion but self-inflicted by Transport for London and London Council policies.

As noted above, a further impact of Cycle Superhighway has been the elimination of turns, left hand in particular, across the network, forcing drivers to take detours. These can often be lengthy, contributing to traffic which had the banned turns not been in place, would not have been necessary.

The proposals for urban realm pedestrian improvements on The Strand-Fleet St corridor are also particularly significant. This is already a heavily congested area, partially as a result of being a diversionary route for the troubled Embankment. To further reduce this capacity can only serve to increase congestion massively.

Active traffic management

TfL uses technology to monitor and manage traffic, for instance altering traffic signals to respond to incidents causing congestion. It has also recently introduced a Road and Transport Enforcement team to provide an on-street response.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Technology is key to managing road capacity with traffic demand going forward. The means to achieve this, from traffic light priority to user charging, is available but the priorities both on a wider strategic scale and on a local scale, need to be identified and the particular technology applied to each.

Traffic light management has received mixed feedback from CPT members, the promised effect of prioritising key, inbound routes in the morning peaks and outbound in the evening, made when the Cycle Superhighway was first proposed, appear to have had little impact on traffic flow, delays or congestion. Commuter routes on the Embankment corridor appear to be the worst affected in this respect, additional delays of over an hour are reported when the active traffic management promised just a fraction of that time.

Active operation of lights, such as that recently announced as a fitment to Audi models, offers considerable promise and can prioritise lights for certain vehicle categories using wireless technology.

It is CPTs understanding that iBus has been extremely successful in regulating and managing the efficiency of London's bus network. Undoubtedly, there may be ways to extend this to other modes but clearly the technology would have to be extended to other groups of vehicles and its unclear how this can be achieved.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

Road traffic enforcement has a part to play in the great scheme but the perception is very much that tackling congestion is secondary to their particular role.

Andy Warrender
CPT Coaching Manager
September 2nd, 2016,

From: [redacted]
Sent: 29 August 2016 19:46
To: Transport Committee; [redacted]; Richard Berry
Subject: \Evidence for me as part of the congestion consultancy

Dear Sir,

Please take this evidence for me as part of the congestion consultancy. Im only a new London Operator, but i have involved in transport operations in London since 1986, ad i might add noticed the changes, To be honest i think visitors to London are suffering due to this.

I recently made a common sense decision to park in loading due to major traffic road works in Peckham, Time and time coach drivers have to make decisions we are constantly put under pressure by parking issues, its obvious that coach companies are being targeted for all things wrong, let common sense prevail but TFL do not budge.even they said i was only 10 mins picking up,

London is stopping valued customers visiting, even drivers try and put people off London just to stay legal, If we are that bad why don't you set up park and rides like other cities do, Least in that way you stop all the problems you seem to have with coach operators It is a joke when UK wont be able to supply euro 6 engines in time but will still fine us thats sa complete joke, if we cant get supply puyt the time back so we can, it seems to me its another way od making revenue and not to cut pollution and i moght add every operator knows it to.charge us for the So we are better off doing what they want and block roads,

At this point i must ask have any parking tickets been issued to tfl red buses. I doubt it.

I was picking up an elderly group form Peckham as the road works were intense I picked up in a loading bay to ease congestion for my common sense, I got a ticket, what is the point in common sense when know at Tfl will Listen to reason; I think that the traffic lights system is the main problem for congestion. if at any time the traffic lights don;t work congestion is very low, so it must be traffic lights at wrong or badly timed on red
From now on I will block the road and be a robot like Tfl
I always have major problems in London I will never recommend London to any customers due to Tfl not listening they think there the police. Coach drivers try and stop congestion with common sense and then penalized

You want the tourists but not the coaches as parking in London is a joke, its bad when i recommend group not to visit London but visit orher cities due to no parking or food facilities anywhere. You say 20 minutes at the London eye, we need 45 mins break? By the time we get school kids to these venues all the spaces have gone

Since starting my own business i realized how bad things have become in London, stay out of London and no problem, Tfl need to start recognizing professional drivers and not blaming them like they do, comments like Move on driver your not wanted, we are not robots like themselves,

Common sence prevails but not where it should

Please accept all info on behalf of my company

Connelly Coaches
Mitcham road
Tooting
London
SW17 9NN

Regards

John Connelly

London Assembly
Investigation into traffic congestion in London

Response from Cross River Partnership

31 August 2016

Views and information
The views expressed in this submission are on behalf of CRP staff as a group of professionals with expertise in the transport industry and do not necessarily reflect the views of our funding and Board partners.

Under the considerations heading, Cross River Partnership is not promoting solutions to the issues being addressed; only suggesting opportunities which could be investigated in the context of application in central London.

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Summary of considerations

There is not one solution to solving the problem of traffic congestion, there may need to be some city-wide initiatives in addition to local projects to address specific issues.

Overall, a behaviour change to help individuals and businesses understand how their purchasing activities impact upon delivery journeys and a modal shift to healthier forms of transport are key to realising long-term change.

Who we are

Cross River Partnership (CRP) is a public-private partnership that has been delivering regeneration projects in London since 1994.

CRP is currently delivering a range of regeneration programmes in the central London sub-region, which each contribute to the achievement of one or more of these objectives.

- Sustainable employment opportunities
- Economic growth and prosperity
- Air quality and carbon reduction
- Making places that work

Cross River Partnership is a voluntary association of local authorities, business organisations and other strategic agencies relevant to London. We deliver programs alongside Transport for London, the Greater London Authority, our eight central London boroughs, and Business Improvement Districts (BIDs).

Our central London focussed programs include the Clean Air Better Business (CABB) program funded through the Mayor's Air Quality fund and the Central London Sub Regional Transport Partnership (CLSRTP) funded through Transport for London.

We also lead a number of European funded projects which include Freight Electric Vehicles in Urban Europe (FREVUE) and Freight Tailored Approaches to Innovative Logistics Solutions (FreightTAILS). Recently we participated in the Last Mile Logistics (LAMiLO) project which aimed to create a step change in freight deliveries by fully considering the last mile of a supply chain when planning a freight logistics journey.

Additional information on our projects and programs can be found in Appendix A and at www.crossriverpartnership.org.

Acknowledgement of traffic congestion issues affecting London

CRP acknowledges the growing impact of traffic congestion on London. We recognise that the increased demand for road space is causing congestion leading to unacceptable impacts on London's productivity and Londoners' health.

We recognise that the effects of transport congestion are set to increase as London's demand for goods and services rise alongside expected population growth. The impact of traffic congestion on poor air quality is of particular concern to CRP, its partners, and increasingly the general public. Many of our projects seek to address these issues.

We must ensure that London remains an attractive place to do business and that our urban environment enhances the quality of life and health of workers, residents and visitors alike.

We are pleased to have the opportunity to share our knowledge and experience in the fields of transport and air quality with the London Assembly and offer considerations for improvement.

CRP Response

This response is broken down in to a number of themes based on the information being sought by the Transport Committee and CRP's relevant expertise.

What is the role of business in relation to the congestion and air quality agenda?

Response

London has an air quality problem that is estimated to cost the city over £2 billion per year and contribute to over 9,400 annual deaths[1]. London's air quality problem affects the health of residents and businesses alike. Without action, London could become a less attractive place to shop, visit and do business. It must also be recognised that business activities contribute to London's air quality and congestion issues. Different business processes can have significant local impacts, and London's businesses are well placed to work with public sector organisations to deliver change.

At CRP we are working alongside Business Improvement Districts (BIDs) and our borough partners to address the issues associated with congestion and air quality. One of the ways we are working with businesses is through our Clean Air Better Business (CABB) programme which is funded through the Mayor's Air quality fund and public and private sector partners. Through CABB, businesses have a key role to play in improving air quality in London by influencing how employees, suppliers, customers and visitors travel.

What we know

- **Procurement:** With the support of CABB BIDs, hundreds of businesses are using their buying power to support suppliers who take air quality seriously and to reduce unnecessary trips by delivery vehicles. For example:
    - By procuring collectively members of The Fitzrovia Partnership saved over £200,000 in just one year at the same time as reducing the impact their supply chains have on local congestion and air quality.
    - Victoria BID's Zero and Low Emission Supplier Directory can be used by businesses to identify suppliers that operate zero or low emission fleets
- **Influencing employee travel choices:**
    - Employers are encouraging staff to travel sustainably by providing access to bikes for short trips. This helps cut travel costs and makes for a healthier, more–engaged workforce. One business commented that, 'staff loved having access to a company' bike provided by our BID, Camden Town Unlimited. One of the partners used it so much we are now looking into the possibility of purchasing one for the office'.
    - CABB is a forum for communicating TfL's cycling work places program which provides discounted Santander Cycle Hire business accounts.
- **Collaborative working:**
    - To address congestion from deliveries and servicing CRP are providing programme management for the West End Partnership (WEP) Deliveries & Servicing Group, which brings together representatives from TfL, Westminster City Council, the borough of Camden, businesses, logistics operators and residents to identify and implement best practice solutions in a specific area.
- **Encouraging mode shift:** Promoting walking or cycling brings a number of benefits to individuals as well as businesses. Cycling in particular is an efficient and cheap way to travel across London and has health, environmental and economic benefits.
    - CRP is working with the New West End Company (NWEC) to deliver an Air Quality Business Assessment Tool. This tool will be used by businesses to help identify actions that can improve air quality such as providing cycle-friendly workplaces and encouraging visitors to arrive in the West End using low-emission travel modes. [2]

[1] https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/air-quality-and-health
[2] http://newwestend.com/wp-content/uploads/2016/06/NWEC-Air-Quality-Strategy-2020.pdf (p.5)

- **Fleet choices:**
    - By converting their fleets to ultra-low emission capable vehicles, businesses are capable of cutting emissions and planning ahead to avoid ULEZ charges. CABB is communicating how the switch is made easier with government grants of up to £4,500 off the purchase price.
- **Reducing exposure to pollution hotspots:** Businesses are encouraging staff and customers to reduce their exposure to pollutants, by taking safer, 'low-exposure' walking routes. This is being achieved by:
    - Promoting awareness of initiatives such as the Wellbeing Walk which provides a safer, cleaner and more pleasant route between Kings Cross and St Pancras stations and has increased footfall past many retailers.[3]
    - Encouraging staff and visitors to plan their journeys using the 'air quality travel planner' available on many BID websites.[4]
- **Eco Driver Training:** Efficient driving skills training are helping fleet operators reduce their fuel usage, cut costs and lower emissions. One driver commented an increase from 47 to miles per gallon. An equivalent to a saving of 23% in fuel costs.
- **Communication and behavioural change:** As part of the CABB anti-idling campaign volunteers from central London businesses spoke with over 500 drivers, asking them not to idle when parked. Drivers who pledged not to idle will collectively save over 2,200 litres of fuel and 400 tonnes of emissions a year.[5]

To be considered

- The delivery of behavioural change campaigns could bring about significant improvements in road traffic congestion and air quality. Businesses and their employees make multiple decisions daily, small and large, which impact upon numbers of vehicle trips, particularly regarding procurement. In our experience behaviour change projects provide good value for money and can deliver:
    - Reductions in CO2, NOx and particulate matter through the last-mile of the supply chain
    - Improved public realm e.g. reduced freight traffic congestion
    - More low carbon freight vehicles in cities
    - Improved road safety
    - Increased SME sustainability and competitiveness

[3] http://urbanpartners.london/london%CA%BCs-first-wellbeing-walk-launches-to-enhance-the-daily-commute/
[4] http://www.betterbankside.co.uk/travel/air-quality
[5] http://crossriverpartnership.org/news/crp-proud-to-support-westminsters-greener-city-action-plan/

What can London learn from other Cities?

Response

Through CRP's experience leading European funded FREVUE (Freight Electric Vehicles in Urban Europe), Freight TAILS (Tailored Approaches to Innovative Logistics Solutions), and our work with LaMiLo (Last Mile Logistics) projects we are familiar with initiatives trialled across Europe and beyond. What is clear is that there is no one stand-alone solution that can be relied upon. Also clear is that what works in one place is not always easily transferrable to another location – the political, social, economic and environmental context in which our cities exist will all impact on the success of initiatives to improve the impact of urban freight movements on air pollution. A blend of different solutions should be tailored to London – and different places within London. Here are a few of the measures currently deployed in our demonstrator cities.

What we know

- **Harmonisation or regulations:** Harmonisation of regulations at a regional level promotes consistent and clear policy and guidelines across a city. Increasing the efficiency of transport systems is one of the most important objectives of EU transport policy, reflected in support for the consolidation and extension of core Trans-European Transport Networks (TEN-T).[6]
- **Last mile Logistics:** Research commissioned by the Industrial Research and Technology Unit suggests that 85% of road freight transport in the EU is carried over distances of 150km or less, and 55% of all goods are not transported more than 50km[7].There is an opportunity to make these trips cleaner and more efficient.
- **Minimum load requirements:** Empty runs of freight vehicles are inefficient and should be avoided. In 2010 almost a quarter of all vehicle-km of heavy goods of HGVs in the EU involved an empty vehicle. Hauliers from Denmark, Sweden, Germany and the Netherlands appear to be specialists in avoiding this but data is incomplete. [8]
- **ICT solutions:** The aim of TNT Express in Rotterdam and Amsterdam, within the FREVUE project framework, is to extend the electric vehicles use in parcel services. Dutch partners have introduced a standard telematics solution (provided by Sycada) in the new electric freight vehicles of TNT Express in order to monitor the energy efficiency of the vehicles and to collect data for the FREVUE project. The information monitored includes the track and trace, the temperature, cargo security as well as the driving style.[9]
- **Cleaner vehicles:** Different goods, logistics models, charging modes and ICT applications are part of the FREVUE demonstrator projects. In FREVUE demonstrator city Madrid, national leader in the express transport sector, SEUR, and TNT, one of the world's largest express delivery companies both experiment with innovative and sustainable logistics solutions. For example, the companies both deploy electric vehicles and utilise consolidation centres. Charging stations have been installed at consolidation centres and at depots for overnight charging. [10]
- **Access, noise and time windows restrictions:** Brussels is in the process of limiting access, which will only allow vehicles of less than 3.5 tonnes into the central area within the framework of federal freight charging policy, while Maastricht is piloting one spot stop-and-drop zones within an already developed freight delivery management system. La Rochelle, France restricts access to the city centre from 6 am to 7.30 am for vehicles over 3.5t but will soon provide an exception for electric vehicles.

[6] http://urbact.eu/sites/default/files/freight_tails_baseline_study.pdf (p.19)
[7] http://urbact.eu/sites/default/files/freight_tails_baseline_study.pdf (p.10)
[8] http://urbact.eu/sites/default/files/freight_tails_baseline_study.pdf (p.15)
[9] http://frevue.eu/demonstrators/electric-logistics-in-parcel-services-tnt/
[10] http://frevue.eu/demonstrators/electric-vehicles-logistics-consolidation-2/

- **Procurement policy and subsidy scheme:** In the drive to expand uptake of electric vehicles, Amsterdam has introduced a system of subsidies for certain classes of vehicles. Most of the applications made through Amsterdam's subsidy scheme have been for electric delivery vehicles ass operators of these vehicles usually have a good idea of their daily mileage, and the lower fuel costs per kilometre offered by electric vehicles can be attractive to business owners. Through this scheme Amsterdam saw the launch in 2011 of Europe's first fully electric taxi company. [11]
- **Pedestrianisation to create behavioural change**: Measures taken by the Paris mayor to tackle air pollution range from banning cars on certain days, banning lorries, and introducing a low emission zone. Other interesting elements include pedestrianising key areas along the Seine, plans to pedestrianise historic areas, and measures to change perceptions and encourage the change from diesel to electric vehicles – by hosting the Formula E in Paris for example.[12]
- **Technology:** Sydney, Australia has released a smart citywide dashboard. On a single page the dashboard details information on transport conditions, air quality and what's trending on social media.[13]

To be considered

- More needs to be done to raise the awareness amongst non-logistics industry stakeholders such as communities and businesses on the impact of their individual choices in relation to how they purchase their goods and services, ultimately on the air quality.
- Develop programs to raise initiatives.
- Contributing to the Open Charge Map the global public registry of electric vehicle charging locations.
- Encourage more/ on-going European collaboration.
- Participate in European initiative to use policy to influence market and production of electric freight vehicles.
- Collecting real-time information about the performance of vehicles and their operations
- Understanding more about the cost associated with delivery and how logistics companies can be more open about costs, to enable savings from last mile deliveries to be realised through consolidation.

[11] http://www.eltis.org/discover/news/amsterdam-introduces-subsidy-scheme-electric-vehicles-netherlands
[12] http://www.bbc.co.uk/news/magazine-36169815
[13] http://citydashboard.be.unsw.edu.au/

Measures to target specific types of vehicles and vehicle use?

Response:
CRP understands that a key part of keeping London's transport moving sustainably is through consideration of different vehicle modes. Individuals benefit financially and can improve their health using modes such as cycling and walking where possible, freeing up space on the public transport network and roads. In addition, heavily polluting vehicles can be exchanged for more modern vehicles with alternative fuel sources to tackle air pollution.

CRP is partnering with our BID partners and boroughs to see many great ideas come to fruition in central London. Below is a sample of projects underway that target specific vehicle types and movement.

What we know

- **Waste and recycling vehicles consolidation:** New West End Company led a waste consolidation project in Bond Street which has reduced the number of waste collection vehicles in the street by 75% and reduced waste collection costs by 25%. During phase one of the scheme, through the appointment of two preferred waste and recycling service providers, benefits to participating businesses have included:
    - 25% of annual waste removal and recycling costs saved on average
    - Reduction of waste providers from 47 to 5
    - 75% reduction of waste vehicles
    - 40% less bags left on the street
- **Supplier Consolidation:** Based on the success of this, CRP is supporting New West End Company to establish the West End Buyers Club. By combining collective purchasing power and negotiating with suppliers to reduce supply chain emission while providing access to competitively-priced goods and services to the club members.
- **Delivery van consolidation:** Consolidation of deliveries to Crown Estate occupiers, combined with delivery by electric vehicles has reduced van trips and local emissions along Regent St. This was a pilot project delivered through FREVUE.[14]
- **Waste and Freight Consolidation:** FitzCloud is a trail scheme launched by Fitzrovia Partnership funded by TfL and the private sector. The pilot is a data gathering and analysis exercise, focussing on what, when, how and why member businesses are ordering the items they are ordering. The overall aim is to reduce surface transport (van deliveries), improve local air quality, and reduce member's procurement costs.[15]The FitzCloud initiative will also support the BID's goal of improving air quality by reducing the amount of service transport and delivery frequencies that enter the district.
- **Cleaner vehicles:** CRP sits on the Go Ultra Low City Scheme (GULCS) and through this recognises that the introduction of the ULEZ will have a positive impact on reducing air pollutant emissions and CO2 from road transport and stimulate the low emission vehicle market by encouraging the uptake of cleaner vehicles.
    - Fully electric or hybrid electric car and freight vehicles: Electric freight vehicles still remain significantly more expensive than their diesel counterparts (mostly due to high battery prices). Very roughly, a 3.5t fully electric truck is 2-3 times more expensive, a 3.5t to 7.5t 2-4 times and larger trucks 4-5 times more expensive than the diesel alternative. The introduction of ULEZ (paired with other measures such as the congestion charge exception) will begin to make the business case look more favourable.

[14] By 2025 the online retail sector will account for almost 20% of total retailing
[15] http://fitzroviapartnership.com/what-we-do/

To be considered

- There needs to be better promotion of the incentives to encourage the switch to more sustainable vehicle types. Our experience suggests organisations typically resist changes to their supply chain despite low CO2 alternatives. Barriers to change that need to be addressed include:
    - Awareness of the impact of freight movements
    - Perceived cost
    - Low visibility of alternative solutions and their benefits
    - City policies preventing an alternative solution e.g. planning conditions that ban deliveries at certain times

How to reduce the number of delivery vehicles on London's roads, especially in congested areas in peak times?

Response

Reducing the impact of delivery vehicles on London roads requires collaboration within the freight and transport industry to change behaviour of private companies, the public sector and consumers to make better use of existing transport infrastructure and networks in order to reduce congestion, reduce harmful emissions and ultimately improve air quality in our city.

Utilising more environmentally friendly transport methods such as electric and other low emission fuel powered vehicles and wherever possible, encouraging the use of freight movement by rail and water should be considered.

What we know

- **Delivery and servicing plans (both business and locality based):** Implementing a bespoke delivery and servicing plan to better manage deliveries to the commercial and retail sector; will in turn reduce the impact of deliveries on local streets. CRP has commissioned studies at multiple sites across central London. The studies show that measures such as using a preferred courier for outbound collection, reducing personal deliveries or provision of dedicated on-street loading bays help to reduce local emissions.
- **Consolidation solutions**
    - **Urban freight consolidation:** The deployment of urban consolidation centres play an important role not only in improving congestion but also air pollution as they enable or facilitate the deployment of electric freight vehicles. These solutions are often initiated or supported by the private sector to reduce the number of vehicles, facilitate the efficiency of freight vehicles loading / unloading in delivery bays, and reduce conflict on streets.
    - **Construction sector consolidation:** At the Stockholm Royal Seaport development, the use of a construction consolidation centre has been mandated. This development in the city district Norra Djurgårdsstaden is one of Europe's most extensive city development areas.[16] As part of this development minimum load requirement for deliveries are mandated. All vehicles carrying limited volumes, i.e. less than five euro pallets, delivering to the building site are obliged to unload at the consolidation centre. Larger deliveries are allowed to enter the area but only after booking a specific time slot and paying a fee.
- **Collaborative working and cross sector working groups:** CRP is represented on the Central London Freight Quality Partnership (CLFQP) and programme manages the West End Partnership (WEP) Deliveries & Servicing Group which provides a platform for public and private sector interests to develop innovative new ways of working together to address problems with freight in central London. The CLFQP brings together service providers, local businesses and employers, and other public sector organisations as part of an on-going forum on sustainable solutions for freight access and services issues in central London, taking full account of local economic, environmental and social factors.[17]

[16] http://frevue.eu/demonstrators/best-practice-ev-logistics-new-development-areas/
[17] https://www.centrallondonfqp.org/central-london-fqp-1/

- **Last mile logistics and the online retail sector:** By 2025 the online retail sector will account for almost 20% of total retailing.[18] It is an important part of the supply chain where environmental and efficiency gains can be made. Utilising electric vehicles for the last mile or consolidating loads are just a couple of examples of how the last leg can be made in a more sustainable way. FREVUE is working alongside UPS as it transforms its urban delivery network in London. [19]
- **Redirecting personal deliveries:** Employers are promoting alternatives to having personal deliveries made to the workplace. This is helping reduce congestion and pollution and reduces staff time spent receiving and distributing packages. This is being achieved by:
    - Informing staff of alternative delivery options.
    - Providing trial subscriptions to parcel management service.
    - For example, one international department store based in London that CRP have worked with has prohibited personal deliveries and is promoting alternative locations where deliveries are better consolidated e.g. Click & Collect, or don't need to enter central London e.g. Collect Plus / Doddle. The work place has eliminated an average of 25 packages per day arriving. As well as reducing emissions, this reduces the time required for staff to handle packages.

To be considered

- Sustainable delivery and servicing plans to be mandated as part of a development application, new businesses or changes in operations.
- To make consolidation centres work support is required to:
    - Secure affordable and suitable sites close to city centres.
    - Establish such a scheme and to gain acceptance amongst key stakeholders.
    - Provide financial or in-kind support, at least until the scheme is well established.
- Allow the industry to innovate by standardising regulations amongst cities.
- Deliver incentives to encourage more sustainable last mile delivery trips.
    - Off-peak deliveries preference for electric vehicles as they are quieter.
    - Dedicated un/loading areas to ensure delivery vehicles do not block the roads and cause further congestion/pollution.
    - Pre-booking systems for un/loading areas.

[18] http://urbact.eu/sites/default/files/freight_tails_baseline_study.pdf (p.12)
[19] http://freightinthecity.com/2015/08/ups-urban-delivery-projects-address-congestion-and-air-quality-in-cities/

Appendix A

How we operate

CRP develops, fundraises for and delivers programmes that add value at a sub-regional level to the individual activities of its public and private partners. CRP operates with Westminster City Council as its legal authority.

CRP delivers projects via a number of programs targeted at addressing various regeneration issues in central London. The following is a summary of programmes delivering transport focused initiatives:

1. ***Central London Sub Regional Transport Partnership (CLSRTP)***
   CRP facilitates this partnership of the eight central London boroughs (Camden, City, Islington, Kensington and Chelsea, Lambeth, Southwark, Wandsworth and Westminster) on behalf of Transport for London. The partnership undertakes research and trials innovative schemes involving both Local Authorities and BIDs to support growth and place making, encourage uptake of active and sustainable transport modes, improve air quality, and make the transport system more efficient. In 2015/16 the partnership facilitated:
   - A secure cycle parking demand and feasibility study
   - An area-based delivery and servicing review
   - A waste consolidation improvement programme
   - European funding for tailored freight logistics programme (FreightTAILS)
   - A scoping study for a Low Emission Neighbourhood

2. ***Freight TAILS***
   CRP has successfully levered in funding from URBACT III to deliver Freight TAILS - Tailored Approaches to Innovative Logistics Solutions. Freight TAILS will share best practice and learning between 10 different European cities, and write this up in the form of city-specific Integrated Action Plans to achieve freight management that is as consolidated, clean and safe as it can be.

3. ***Freight Electric Vehicles in Urban Europe (FREVUE)***
   CRP is the lead partner for this 30-strong trans-national partners Programme to trial different sizes and types of freight electric vehicles across 8 countries across different climates, industry sectors and policy environments. Detailed statistical results will begin to come through during 2016/17, showing the real contribution that freight electric vehicles (including large electric vehicles) could make to air quality and a cleaner London. This programme is funded by the European Union's Seventh Framework Programme.

4. ***West End Partnership Freight Programme (WEP)***
   As part of this work, WEP have set up Freight Group to pull together all the current projects working to reduce freight. The development of a plan to 2020 will ensure that enough is being done to keep the West End moving, with goods and services coming and going efficiently. The programme will look at reduction, re-timing and consolidation of freight movements, in addition to increasing ultra-low emission vehicle projects to deliver commercial, health and air quality benefits.

5. ***Clean Air Better Business*** **(CABB)**
   Fresh from the success of Clean Air Better Business Phase 1, CRP is now delivering Clean Air Better Business Phase 2 with 16 inner London boroughs and BID partners, funded by the Mayor's Air Quality Fund. An exciting programme of collaborative behaviour change

activities will be delivered with business over the next three years.

6. New West End Air Quality Strategy

Cross River Partnership is working with New West End Company to deliver a strategy to improve air quality in the busy West End shopping area. This Air Quality Strategy aims to deliver a significant reduction in air pollution between 2016 and 2020. It complements the action that will simultaneously be undertaken by public authorities, including Westminster City Council and Transport for London. Initiatives of the program include:

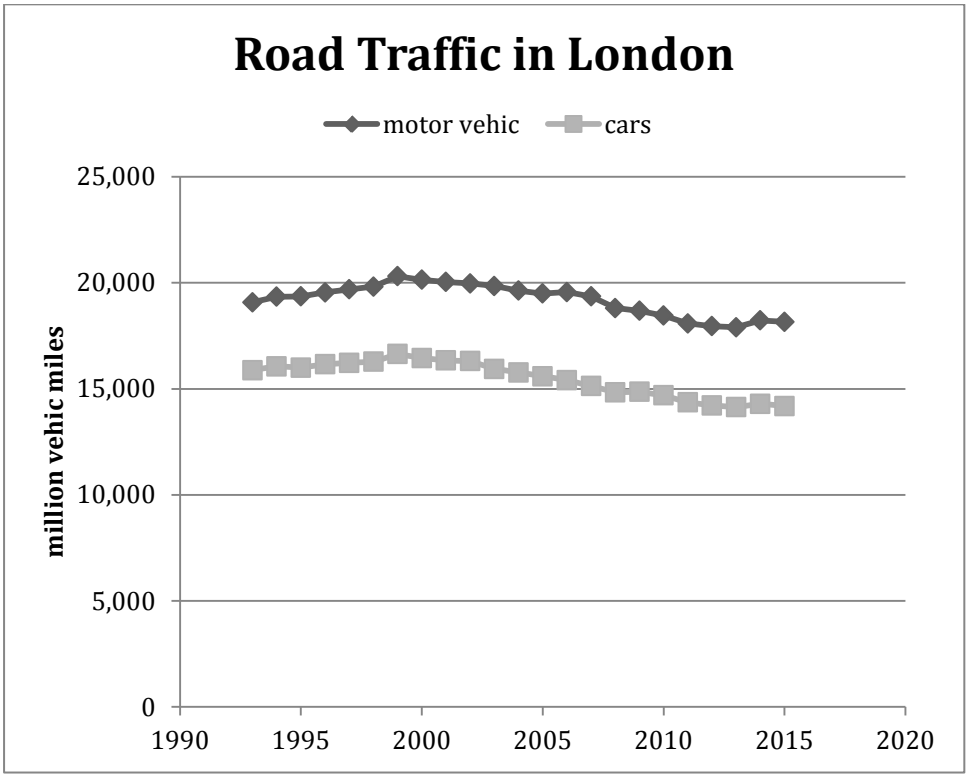
- Consolidating suppliers (via the West End Buyers Club)
- Developing and implementing Delivery and Servicing Plans
- Providing cycle-friendly workplaces
- Encouraging visitors to arrive in the West
- End using low-emission travel modes

London Assembly Transport Committee Investigation into Traffic Congestion,

Submission by Dr David Metz, Honorary Professor, Centre for Transport Studies, University College London

Introduction

Although London's population has been growing quite rapidly, road traffic in London has not increased over the past two decades, both cars and all motor vehicles, as Department for Transport statistics show (see Figure).



Road traffic growth has been inhibited by the retention of London's historic street pattern, more road space allocated to buses, cycles and pedestrians, controls on parking in inner boroughs, and congestion charging. The public has accepted constraints on road traffic growth because of investment in public transport, particularly rail, which generally provides speedy and reliable travel for commuting and for work-related journeys in central London. As the population has grown, car use, as a share of all trips, has declined from a peak of

50% in 1990 to 36% currently, projected to decline to perhaps 27% by mid-century with continuation of present policies.[1]

Mitigation of Traffic Congestion

Average travel time is invariant as measured in the National Travel Survey: over the past 40 years, it has remained steady at about an hour a day nationally, 1.1 hours in London. Accordingly, traffic congestion is self-limiting: as traffic speeds fall, journey times rise, and flexible road users change the timing, mode or destination of their trips. Gridlock can generally be avoided through Active Traffic Management measures.

The origin of the recent observed increase in congestion is unclear: it could be a short-term response to particular developments, such as the Cycle Superhighways or the construction boom, with congestion expected to lessen in time as the more flexible road users adjust.

Of the of possible means for mitigating congestion:

- Investment in rail to accelerate mode shift is likely to have the biggest impact. (Relevant to Q13)
- Flexible road users could be encouraged to avoid peak congestion by providing them with good information on expected journey times via mobile phone apps. This would reduce congestion for those whole are less flexible.
- A workplace parking levy might be beneficial, particularly by generating funds to support investment in public transport. (Relevant to Q8)
- More bus priority measures, including Bus Rapid Transit, would increase the speed and reliability of buses, thus attracting people from cars. (Relevant to Q12)
- It would be worth investigating the scope for fine-tuning road layouts, on-road parking restrictions, permitted turns and Active Traffic Management, based on suitable traffic modelling methodologies.
- Car sharing in place of personal ownership results in people making less use of the car, which is helpful. (Relevant to Q11)

Other possible means for mitigating congestion seem less attractive:

- The extension of congestion charging to the Western zone in 2007 and its subsequent withdrawal in 2011 had little impact on congestion. A substantial increase in the charge would pose problems of public acceptability. (Relevant to Q5,6)
- New road infrastructure, such as the proposed East London River Crossings, would add to traffic without reducing overall congestion.[2] We know from

[1] http://londonpublishingpartnership.co.uk/travel-fast-or-smart/ https://www.gov.uk/government/publications/future-of-cities-beyond-peak-car

[2] http://peakcar.org/east-london-river-crossings-how-worthwhile/

experience that we can't build our way out of congestion (and understand why).[3] (Relevant to Q14,15)

- Regrettably, investment in cycling infrastructure is unlikely to get people out of their cars. In Copenhagen, 30% of all trips are by bike, but car use at 33% is only a little less than London: walking and public transport take the hit.[4] However, investment in cycling infrastructure would reduce crowding on public transport. (Relevant to Q4,14)
- Driverless cars, as being developed by Google for instance, are essentially taxis with robot drivers. More use would be made of such taxis if they were cheaper, as they might be if robots replaced human drivers, which would increase demand. Parking requirements for privately owned cars might reduce in residential districts and in off-street car parks, but not for on-street parking in central areas, so the impact on congestion seems unlikely to be substantial.[5]

Increased vehicle occupancy

One longer term approach to mitigating congestion would be to encourage increased vehicle occupancy. For instance, UberPOOL offers ride sharing for people going in the same direction, sharing the cost. In the long run we might envisage a system of driverless shared-occupancy taxis. This could be facilitated by (a) demand management measures to prioritise shared over single occupancy (as High Occupancy Vehicle lanes on US freeways or the exemption of taxis from congestion charging in London); and (b) traffic management that takes advantage of developing vehicle-to-infrastructure communications to smooth flows and avoid conflicts (analogous to Air Traffic Control). While implementing a system of this kind would face formidable challenges – technological, institutional, commercial, public acceptability – it offers the prospect of a more efficient road network that provides reliable, uncongested, door-to-door travel at the user's time of choice.

Conclusions

Traffic levels in London as a whole are stable, despite population growth. Congestion is self-limiting, as flexible road users adjust to slower speeds. There is scope for accelerating the shift away from car use, without detracting from London's success, particularly by further investment in public transport, which could ease traffic congestion. In the long run, driverless shared-occupancy taxis may allow a significance increase in efficiency of the road network.

23 August 2016

[3] http://peakcar.org/can-we-build-our-way-out-of-congestion/
[4] http://peakcar.org/cycling-in-copenhagen/
[5] http://peakcar.org/driverless-traffic-in-towns/

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Georgie Wells
Assistant Scrutiny Manager
Scrutiny & Investigation
LONDON ASSEMBLY
Greater London Authority
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By email

1 September 2016

Dear Georgie,

Following is a brief submission from DX Group plc in response to the Call for Evidence for your Congestion Investigation.

DX is a leading independent logistics and parcel distribution company operating throughout the UK and Ireland. We have four service centres in the London area, providing mail and logistics services to all parts of the city and surrounding areas throughout the week.

Please contact me if you have any further questions.

Yours sincerely,

Michael MacClancy
Head of Regulatory Affairs

London Assembly Transport Committee – Congestion Investigation – Call for Evidence

1. How has traffic congestion changed in London in recent years?
   The rush hours periods have lengthened. In the mornings, the traffic is now congested before 06.00hrs and the congestion lasts up until 10.00hrs with a similar pattern in the evening.

2. Are there differences in the amount, time, type and/or location of congestion?
   DX makes deliveries and collections both inside and outside the congestion zone and our impression is that congestion has spread outside it. Recent examples are in the SE area, particularly when the Blackwall Tunnel is closed, when the whole area becomes gridlocked for the day and evening.

3. What are the key causes of these changes in congestion?
   London population is growing and this brings infrastructure problems. Since the CC was introduced, the initial effect has lost its momentum. Congestion charges are now often paid as expenses for those using it on a work basis, reducing the effect of the levy.

4. What impact does congestion have on Londoners (including DX), the city's economy (including DX's business) and its environment?
   No response.

5. What can London learn from other cities in its effort to reduce congestion?
   No response.

6. How effective is the Congestion Charge?
   As mentioned for question 3, the congestion charge has lost its impact and, we would assume, its original purpose: to reduce traffic in the central London areas.

7. Should the Congestion Charge scheme be modified?
   Yes. It should cover a larger area with different timings for cars and commercial fleets.

8. To what extent would a usage-based road pricing regime reduce congestion?
   We are not sure what effect that would have. We would need to see any plans based on this first in order to assess it.

9. How might the Ultra-Low Emission Zone and Emissions Surcharge affect congestion levels?
   This is a better suggestion than that of the current plan. With the growing use of electric vehicles and lower emissions commercial fleets it looks like a good way forward.

10. What would be the benefits and drawbacks of these other interventions?
    a. Toll charges for river crossings

Do not know. Would appear to be difficult to administer and might lead to isolation of north and south banks of the river.

b. Workplace Parking Levy
This would only work if the charge were levied directly on the employee, whose sensitivity to this charge might be higher than the employer's.

c. Devolving Vehicle Excise Duty to London
How would this work? Many vehicles are registered outside London.

11. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?
This would be a one-dimensional approach that assumes that commuters should have priority over commercial vehicles at peak times. Planning needs to consider all aspects of this problem and a substantial element of the solution must be the reduction of non-essential commuter journeys during peak periods by means of improved public transport and the reduction of distance between homes, workplaces and places of education.

The temporal segregation of traffic types during the 2012 Olympics is worthy of further consideration as a model.

12. To what extent is an increase in minicabs contributing to traffic congestion?
The increasing use of Uber in recent month must have increased taxi traffic in central London although it is not possible for us to quantify.

13. How could the increase in minicabs be addressed?
Licensing of minicabs and similar services such as Uber and their prohibition in the congestion zone.

14. What contribution can car clubs make to tackling congestion?
No response.

15. How can the Mayor and TfL encourage car clubs?
No response.

16. To what extent could greater efficiency in the provision of bus services help reduce congestion?
Not just bus services but also trains and tubes.

17. How could greater efficiency in the provision of bus services help reduce congestion?
Double-deckers are inconvenient for passengers and do not have enough seats downstairs. Consideration should be given to higher priced premium services.

18. How can TfL further encourage a shift from private car use to public transport or active travel modes (such as walking and cycling)?

A combination of supply and demand side measures. Private car use needs to be discouraged by charging mechanisms that directly affect individual users and not their employers. Public transport needs to more efficient and appealing to users. Town planning needs to consider the requirement to reduce distance travelled between homes and places of work, education and facilities such as shops.

19. Can new road infrastructure help reduce traffic congestion?
Yes, if it removes traffic from urban areas that cannot cope with it.

20. What specific new infrastructure is required in London?
We suggest modification of the A23 and A40.

21. To what extent is there a risk of new roads encouraging more people to drive?
There is a clear risk that new roads will encourage more people to drive but the number of people driving is not the problem. The problem is people driving in the wrong place at the wrong time, causing congestion.

22. How can this risk be avoided?
By building roads that take vehicles away from congested areas that they do not need to be in.

23. How should new road infrastructure be funded?
No response

24. How effective are TfL's measures to limit roadworks, such as the lane rental scheme?
Better communication via TFL is evident but not sure how much control and evaluation is in place.

No response

25. How can these measures be made more effective?
No response

26. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?
These measures appear to add to congestion by reallocating road capacity to cyclists and pedestrians. This supply side measure needs associated demand side measures such as congestion charging in order to reduce demand for the reduced road capacity for motorised vehicles.

DriveNow

DriveNow UK Ltd, United House, North Road, London, N7 9DP

From Joseph Seal-Driver
Telephone [redacted]
E-mail
Date 22/08/2016
Subject **Response to London Assembly Transport Committee investigation in traffic congestion in London.**

Background:

There are currently several models of car-sharing operating in London. The traditional form of car-sharing (A to A) where users start and return to a fixed bay e.g. Zipcar has been operating for a number of years. New forms of one-way car-sharing have emerged in the past few years. These are station-to-station where cars start and stop in specific bays (s) and fully flexible where cars can park at most parking spaces within specific area.

DriveNow is a flexible car sharing offering from BMWi and SIXT that has already proved to be successful in North East London, since launching in December 2014. DriveNow (ReachNow) operates in 11 cities across Europe and the US. Building upon our success we would like to introduce this model of car-sharing to the rest of London. The support of the Greater London Authority Transport Committee would give an indication to boroughs that flexible car-sharing has positive benefits to London as a whole.

Flexible car sharing members can pick up and drop off vehicles at most parking bays within a defined business area, using their smart phones to locate and spontaneously reserve the vehicles. Members then drive by the minute, or by the hour, allowing for one-way flexible journeys.

The Car Club Coalition, which was formed by car clubs and Transport for London (TfL), set a target to have one million car club members in London by 2025. Half of this target is predicted to come from flexible car sharing operators such as DriveNow. The Coalition set out that car clubs can bring a number of benefits to London including lowering congestion, freeing up parking spaces, and improving air quality.

Q11: What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL Encourage these?

Our new model has similar benefits as traditional models of car-sharing.

1) Flexible car-sharing reduces congestion by removing cars from the roads.

- Carplus, the charity part funded by Transport for London (TfL), released its annual survey recently revealing that since launch 1 in 10 flexible car-sharing members had given up their cars and that 21 per cent have deferred purchase of new cars.
- The City of Munich commissioned an independent report on car-sharing in the city. Approximately 10 per cent of DriveNow customers gave up their car and close to 40 per cent chose not to purchase

a car. The overall replacement of cars for fully flexible was between 1:2 (low scenario) and 1:7 (high scenario).

- Flexible Car Sharing as DriveNow attracts completely new user groups who had never thought about using car sharing. The user base and fleet size is significantly higher than station-based car sharing. This translates into a by far stronger leverage effect.
- A study by the University of California on our competitor car2go in 5 cities in North America indicated that between 2 per cent and 5 per cent of members sold a vehicle due to car2go and between 7 per cent and 10 per cent avoided purchase. When considering both of these impacts and the membership size, each car2go vehicle removed between 7 and 11 cars from the road.

2) Flexible car-sharing reduces congestion by reducing the Vehicle Miles Travelled (VMT) by customers.

- The Carplus annual survey showed that on average flexible car-club members showed an 836 mile reduction in VMT per member. Some members showed an increase in mileage, but this was far outweighed by those who gave up private cars and drove significantly less.
- For the City of Munich report the total overall reduction in kilometres travelled was approximately 25 million kilometres.
- The car2go study indicates that there was reduction of between 138 and 771 miles travelled per member.

3) The pricing model of DriveNow, where payment is made per minute, incentivises customers not to travel in congested areas or at peak periods. DriveNow customers use our cars to travel after peak hours for motorized transport in London. We would be able to show evidence of this to the committee from our own data. This pricing model is unique to DriveNow. Traditional car-sharing models offer rental per 30 minutes with no difference in price at peak times. On-demand private hire vehicles operate with a per mile and per minute pricing model that has a lower impact on dis-incentivising peak travel.

4) Data that is collected by DriveNow on where cars start and end their journey is shared with authorities to understand journey patterns of those that are using cars. This allows for better planning of road infrastructure and planning of public transport. This is data that transport planners would not be able to retrieve from those in private vehicles.

5) The Carplus annual survey showed that the occupancy rate of flexible car-club cars is 2.4, compared to 1.6 in private cars (London Transport Demand Survey 2014/15). Additionally, 21 per cent of flexible car-sharing members use the service to carry luggage or bulky items.

6) Borough and city transport planners hold more control over a flexible car-sharing fleet than private vehicles. DriveNow technology is able to adapt to policy parameters within London to ensure that positive impacts to the city are maintained. Already, this technology allows planners to choose areas of high parking strain where our cars are unable to park.

7) DriveNow appeals to an important target demographic, those that own one or more cars and have a strong affinity with a private car. DriveNow members before they join are more likely to 1 or more cars than traditional car-sharing models. This demographic is more difficult to move onto public transport, but DriveNow offers an alternative to them.

Q13: How can TfL further encourage a shift from private car use to public transport or active travel modes?

Our model can contribute to a shift from private car use to public transport.

- Private car owners are incentivised to use their cars for the majority of journeys because they have already sunk the cost of car ownership as fixed costs e.g. tax, insurance etc. With large fixed costs they are incentivised to drive more to lower the overall marginal costs.
- The average variable cost of running a car is low e.g. fuel. When directly compared on variable costs a car will outcompete public transport.
- Our pricing model shows the full marginal cost of driving (including all the fixed costs). This dis-incentivises customers to use a car for every trip. The true cost of private car ownership is revealed and levels the playing field with public transport.
- DriveNow reduces the number of cars parking on the roads. With fewer cars parking streets can be re-purposed towards other forms of sustainable transport e.g. cycling. This will contribute towards the visibility of more active forms of transport and constrain the use of parking for cars.
- Availability is the number one criterion for car sharing. In addition to the fleet size the option for parking at origins and destinations of trips is crucial. Ideally, as a first best regulation, parking management with dynamic and differential pricing would not only resolve the parking pressure problem but also, as a side effect, would implicitly favour car sharing over private car use. As long as this is not in place, privileged parking spaces for car sharing are a second best solution.

Q14: Can new road infrastructure help reduce traffic congestion? What specific road infrastructure is required in London? Q15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

- Additional road infrastructure or improvements in alternate mobility options e.g. the tube are important for relieving congestion. It is not only important to invest in the major congested roads but also improve capacity elsewhere to absorb diverted traffic. Otherwise congestion problems will be pushed elsewhere in the network.
- Investment in road infrastructure must be supported by smarter ways to manage traffic demand. Congestion, including search traffic for a parking space, can be seen as an excess usage of the scare road space. The most efficient way to reduce excess usage is to price the use of road space according to demand and have a market clearing price for both traffic and parking spaces. For example, usage of road space should be more expensive at peak times of the day. DriveNow's pricing model (per minute) contributes to this smarter pricing network.
- In terms of pricing, the area should include all areas, not solely the most congested roads. This is to avoid the negative impacts of spillover from more congested area. The current congestion charge zone is too small, and the proposed larger Ultra Low Emission Zone (ULEZ) is welcomed.
- Quality objectives regarding traffic flow and search traffic are essential. For example, for road travel it should be possible to drive across the city at a given average speed of xyz. For search traffic it should be the number of minutes after which a parking space shall be available.

Q16. How should new road infrastructure be funded?

- The revenue generated by road pricing shall be earmarked for the investment and maintenance of road infrastructure. If smart pricing does not generate sufficient amount of funds, a base tariff should be introduced as well which would make up for the gap. Excess funds could be used for improving public transport or the quality of neighbourhoods.

Why should London support both Traditional and Flexible forms of car-sharing to reduce congestion?

Both models have similar impacts upon private car ownership levels and VMT. The Mayor should support the expansion of both models in London. The Car Club Coalition, led by TfL, has a target of one million car-club members by 2025. London is will struggle to get to this scale without adopting flexible car-sharing, lowering the potential positive impacts to the city.

Flexible car-sharing has a higher rate of membership than traditional car-sharing. Typically one traditional car-sharing car can service up to 70 members, whereas a flexible model can serve above 150 members per car. Therefore any positive benefits from car-sharing will be amplified in the flexible model. We have attached all of the reports mentioned in this response as evidence for the Transport Committee. We can further go through this evidence to show you the positive potential impacts of new car-sharing models or congestion pricing models and alleviate any concerns you may have. To further outline our proposals and answer your questions, we would like to request a meeting.

We look forward to hearing from you.

Yours sincerely,

Joseph Seal Driver
Managing Director
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Nico Gabriel, Joseph Seal-Driver

Investigation into traffic congestion in London

Response from the Driver-Guides Association

The Driver-Guides Association (DGA) is the national professional association for qualified Blue Badge tourist guides who undertake tours in their own vehicles. It is based in London and has members throughout the UK. It was formed in 1982 and it is a not-for-profit organisation.

The Blue Badge is the highest tourist-guiding qualification in Britain. Once awarded by regional tourist boards it is now controlled by the Institute of Tourist Guiding. It is equivalent to a university degree or NVQ Level 4.

Because driver-guides carry passengers in their cars for payment they come under PHV regulations and are therefore part of TfL's transport strategy. However, the business of Blue Badge driver-guiding is completely different from mini-cabbing and the unique status of the DGA and its members is recognised and acknowledged by LTPH and TfL.

The current level of traffic congestion is having a considerable impact on sightseeing tours in London. So much time is spent sitting in stationary or stop-start traffic that the amount of actual sightseeing that can be done, including interior visits, is reduced. This results in an overall reduction in the content of a tour and therefore the visitor experience.

Journey times between home and the start of the tour in central London have increased also, resulting in a longer working day with members having to leave home earlier in the morning and getting home later in the evening.

Cycle Super Highway.
Traffic congestion has been increasing steadily in recent years but the current situation is clearly the result of the Cycle Super Highway. Not only in its construction but also the way that traffic is managed to accommodate cyclists. When the plans were first revealed it was acknowledged that journey times would increase.

a) ***Reduced road space.*** It stands to reason that if you reduce the road space the congestion will increase and of course that is what has happened. One example of this is along the river between say Northumberland Avenue and The Tower of London. That journey during the day used to take 5 to 10 minutes. Now it takes at least 20 and even 30 minutes. There are many other examples

b) ***Banned turns*** also increase traffic jams. Examples of these are:

- Victoria embankment onto Westminster Bridge – no left turn. The road has been reduced to one lane and the traffic must turn right towards Parliament Square. The

result is congestion leading up to that junction and west-bound on the bridge. Also increased traffic in Parliament Square and a longer wait to turn right into Horse Guards Avenue.

- Fish Hill onto Lower Thames Street. Left turn is no longer permitted. Subsequently traffic has to go along East cheap, which is now heavily congested.
- Whitechapel High Street – no right turn into Leman Street
- Shorter Street - buses and cycles only. How does one drive from Aldgate to The Tower?

c) ***Re-phasing traffic lights for the benefit of cyclists***. Traffic lights are at red for longer causing congestion. Examples include:

- approaches to Parliament Square with increased traffic, especially from Birdcage Walk, Victoria Street and Westminster Bridge, which is now often at a stand-still.
- Vauxhall Bridge north side. Traffic used to flow freely, for the most part. Now the traffic backs up across the bridge to Wandsworth Road and can create gridlock on the one-way system.
- Although not connected to the cycle super highway. Traffic lights outside the fire station on Albert Embankment are at red for longer than they need be, causing a tailback that can impact on the roundabout at the end of Lambeth Bridge.

Removing the exemption from Congestion Charge from Private Hire Vehicles

The mayor's office says that the increase in the number of Private Hire vehicles contributes to London traffic. As I don't have have access to traffic statistics I cannot comment on that. However, do remember that PHVs are exempt from the congestion charge only when they are being use to carry out a booking. Therefore, one must assume that all PHVs within the congestion charge zone are there to fulfil a booking. So removing the exemption will not make any difference. It will just increase the cost of providing the service.

Many tours undertaken by London-based DGA members start and finish in central London. Some tours are of London but many are to destinations outside London. Either way they must enter the congestion charge zone to collect their clients. Removing the exemption for the congestion charge will not reduce the number of driver-guides in London but it will add to the costs of providing this service.

On Street Parking.

It has been the policy for some time to reduce the number of on-street parking spaces. This can also contribute to traffic congestion. The assumption that if you make it more difficult to park, vehicles will not be driven into central London is flawed. This is because the vast majority of vehicles in London are there on business and many of them have to park. These include maintenance operatives, electricians, lift engineers, air-conditioning engineers etc. etc. All have to park their vehicles. In some areas the majority of on-street parking is occupied by these vehicles. Often from as early as 07.30 during the week.

Blue Badge driver guides also need to be able to park their cars. For instance, when meeting clients in their hotel, during lunch, interior visits to say Westminster Abbey or Churchill's

War Rooms, St Paul's Cathedral etc. Because the number of parking places has been (and is still being) reduced, combined with the number of maintenance and other business vehicles that have to park, it is often difficult to find somewhere. This not only inconveniences the clients, but having to drive round (and round) to find somewhere contributes to traffic congestions and to air pollution. I once drove round the streets around Westminster Abbey for 45 minutes before I found a parking spot.

Solution

I cannot offer a solution to the congestion problem. But I would urge you to have a good look at all the special provisions for cyclists and the impact on other road users. Is all this really necessary?

- The amount of road space - do they need that much?
- The inflexible infrastructure - The cycle super highway is often completely empty of cyclists for much of the day and is only busy during rush-hours.
- Extra traffic lights and re-phasing.
- Banning turns to other road users - it is really necessary to give cyclist this level of priority?

Separating cyclists from other road users can increase the safety for cyclists of course. But perhaps a campaign to encourage them to exercise basic road craft and to comply with road traffic regulations would also help.

Peter Jamieson
Vice Chairman
The Driver-Guides Association

1 September 2016

Ebdons Tours

From: Keith Payne [redacted]
Sent: 02 August 2016 14:20
To: Georgina Wells
Cc: [redacted]
Subject: Traffic Congestion in London -An Investigation by the London Assembly

Dear Panel,

Thank you for the opportunity to participate in the investigation for the riding congestion in London. As a coach operator for many years and a former Chair of Coach parking Committees, on trade associations (CPT), this is very useful to be able to contribute.

Your Key Questions: (I shall answer them without re-writing the questions, from your survey)

1: Traffic congestion has changed over the last two years, but has increased, in the main since, the introduction of the Congestion Charge, on major roads, as the outer London roads may have taken on a greater volume of traffic, as a through flow.

2: Major causes are the rephrasing of traffic lights, that do no allow a sensible flow of traffic to be maintained- this was first evident when Mayor Livingstone – chased the traffic light phasing prior to the introduction of the congestion zone in February 2003, once the charging zone came in this was changed but traffic flow was still not very good. Sadly the reduction in junction sizes by TFL has also restricted traffic flow, so vehicles at a junction can , no longer line up 3 three, a Brest (when large vehicles are involved) –fewer vehicles traverse road junctions and the tailbacks extend right back into the suburbs. Unfortunately whilst the mechanism to enable a greater , safer cycling campaign has been necessary – it has probably taken a third of Central london Road Space overall, thus reducing speeds and increasing the pollution, that it was designed, ultimately to reduce.

3. A slower city restricts movement and restricts the operation of the city- In Tourism terms alone London is fast becoming a place not to go to- it is Tourist UN friendly – nowhere to set down or pick up, sensibly, or safely- the continuing inability to operate a London sightseeing tour now. Given that

vehicles speeds are now slower emissions will be higher– The use of speeds bumps on minor roads does not restrict the speeds but increase congestion and emissions.

4. Sadly London is not as comparable to other cites in the |United Kingdom because the demand for space is much higher in the Capital. Most European cities may have larger spaces available but in tourism terms they provide proper spaces for their visiting coaches. Cycling is necessary and the safe provision is necessary but the mistake in the Superhighway is that it is a two way operation. Had it have taken a single lane each way– it would work better is more progressive and overall traffic flow would be better.

5. The Congestion charge should be scrapped completely whilst it may be a revenue provider– it becomes a contradictory when it is free after 1800 hours– there is then a large volume of traffic essentially queuing up to enter the zone at that time– higher emissions and the fact it does not operate at weekends when there is huge congestion, even at 0100 hours in the morning along the embankment, towards Tower Hill– makes no sense.
6. Road Pricing would be no different to the congestion charge and again disproportionate
7. There is a need for business to continue to use London Roads the Emissions surcharge will ultimately see business fall by the wayside and the indigenous population having to pay every day where they live– this will not be tolerated– The ULEZ cannot be reasonably applied when there are Trains and aircraft and other contributors to the emissions debate. The only solution is a complete ban of vehicles from Central London only– not practical at all.

8> You cannot continue to tax people for their usage a large proportion is spend on fuel duty, road tax and their does come a point where those paying it cannot afford to do so, nor can they get onto public transport– there is no room. Incomes do not rise to take account of additional London charges and most certainly not devolving Vehicle excise duty. London is a city and not a state.
9> Reduce the number of London cabs, vans and minicabs into the city– in the main (apart from vans delivering to shops) the supermarket home delivery vans have to be low emission and cabs/MINICABS SPEND A LOT OF TIME IN London engines running all the time but with single occupancy.

10> Reduce the licences on large minicabs companies restrict fleet sizes

11> None what so ever – people do not like to share – Trains and buses HAVE to have space be efficient and cost effective to manage that change–

12> Bus services are in the main fine and give a proper service – fares are still an issue, as is capacity, also for those in cars– to get them out of the cars they need to understand that the Oyster card is necessary to actually board a bus– many car drivers have no concept of an oyster card, or not being able to pay the fare to the driver.

13> Sensible fares– NOT frozen fares they are unsustainable people will pay a reasonable amount of money for a decent service.

14> Stop the reduction in sizes of junction – they do not work put park and ride systems on the South and North Circular roads for designated vehicles – put another crossing on the Thames – Not a pretty flowers bridge a road bridge and crossings (can be toll crossings as is intended in 2020 plus for Blackwall tunnel etc)

15> No risk at all new roads promote an alternative route and keep vehicles out of central London reduce congestion etc.

16> Central Government– There is road tax paid, for this purpose obviously every London business over a certain rate level pays £2000 for cross rail, as it is. Use road tax for roads– simple and regulate road works – major projects in town where vehicles just take road space and do not move…

17> On the face of it the TFL measures apparently do not work – there seems to be no joined up thinking with the utility companies– Thames Water seem to be the biggest villain

18> Huge See 2. It is too large and to under utilised for the amount of money spent and no contribution from the users–Unlicenced, uninsured– to fund such a major project without any contribution is unrealistic in the 21st Century– daily charge – pays for your bus fares.

19> Unable to answer this question, not enough information provided in the question, on what is available to do so.

20> Unable to comment– No evidence of the success of this team

Please do not hesitate to contact me if you require any further information, or assistance, in relations to my submission

Best regards,.

Keith Payne 2nd August 2016
Managing Director

EBDONS TOURS OF KENT
50 YEARS OF PASSENGER SERVICE

233a Main Road,
Sidcup, Kent DA 14 6QS




COACH HIRE: 16,27 and 49 Seaters
Email: [redacted] www.Ebdonstours.co.uk
Campervan hire on: www.getawaycampers.co.uk –
Email [redacted]

2 September 2016

London Assembly Inquiry into Traffic Congestion in London

The Federation of Small Businesses (FSB) welcomes the opportunity to respond to the above named inquiry.

The FSB is the UK's leading business organisation. It exists to protect and promote the interests of the self-employed and all those who run their own business. The FSB is non-party political and is also the largest organisation representing small and medium sized businesses in the UK.

Small businesses make up 99.2 per cent of all businesses in the London, and make a huge contribution to the UK economy. They contribute 44 per cent of London's GDP and employ 39 per cent of the workforce[1].

One of the 12 FSB asks in our London Manifesto for the Mayoral/London Assembly elections was to:

Announce a full review of transport charging schemes in London

Root-and-branch reform is needed of the entire charging system in London, including tunnel charging, to ensure a dynamic demand-based charging system that can support the competitiveness of businesses and consumers and protect the environment.

So we are delighted that this inquiry is discussing this pertinent issue so soon after the elections took place.

[1] http://www.london.gov.uk/moderngov/documents/s22201/SMEs%20in%20Londons%20Economy.pdf

The FSB supports the principle of improving air quality and removing from the roads those vehicles that contribute disproportionately to air pollution. No responsible business organisation can condone the use of excessively polluting engines. However, we are concerned about the need to ensure that any improvements in air quality are not achieved at a disproportionately high cost to business – with damaging consequences for jobs, business viability and the economy as a whole.

A well-functioning road, tube and train network is critical for business success. Congestion in London damages the competitiveness of businesses in the city; the FSB supports a demand-based approach in the capital and we welcome the proposed Crossrail 2 project. However, fairness is critical to small businesses that need to compete with their larger counterparts.

Micro and small businesses face disproportionately higher costs than medium and large-sized ones in carrying out business activities. A recent 15 per cent Congestion Charge increase, combined with future changes to the Low Emission Zone (LEZ) and the introduction of an Ultra Low Emission Zone (ULEZ), adds to pressure on struggling smaller businesses and makes it harder for them to operate in and service the capital.

Many small businesses rely on LGVs to carry out their business activity. We do not want to see tradesmen, construction business owners or market traders refusing to serve London, which is why transport policy in London needs to recognise the difference between essential and non-essential journeys. Someone driving into central London because they choose not to use public transport is different from the repair man, delivery man or service engineer for whom the use of a vehicle is fundamental to their business.

A small business looking to operate a vehicle in London will be faced with a number of charge points in and around Greater London:

a) Congestion Charge
b) Low Emission Zone
c) Ultra-Low Emission Zone
d) intended future charges on the Blackwall Tunnel
e) expected Silvertown Tunnel charge in the future
f) Dartford Crossing charge

A recent FSB Congestion Charge survey[2] showed:

- 46 per cent of businesses feel that the Charge should be less during off-peak hours and 34 per cent believe that it should be increased during peak times.
- 35 per cent of firms feel that the amounts charged should be higher for environmentally 'less friendly' vehicles and 39 per cent feel that they should be lower for environmentally 'friendly' vehicles.

The time has come for a grown-up debate on whether the current charging mechanisms, and future mechanisms, will do more harm than good to London's competitiveness. It is our opinion that these blunt instruments have disproportionate impacts on smaller businesses and that TfL and the Mayor should act now before more small businesses are priced out of London.

Solutions:

[2] FSB Congestion Charge Survey, February 2014.

- Root-and-branch reform is needed of the entire Congestion Charge scheme, including tunnel charging, to ensure a dynamic, demand-based charging system that can support the competitiveness of businesses and consumers.
- Single registration system for business vehicles for all charging schemes.
- A feasibility study should be undertaken to assess whether a new and improved road charging system could be more sophisticated and better reflect journey and emission patterns.
- Until a feasibility study is undertaken: one essential business vehicle to pay the same rate as residents in the Congestion Charge zone.

Delivering goods and services in London

The costs of moving goods and employees around the capital are disproportionately higher than in many other parts of the country.

Many areas in London have retained outdated delivery time restrictions. These should be reviewed to take into account modern vehicle design and delivery practices. During the 2012 Games, the FSB supported night-time deliveries, and we believe that many of the lessons learned during that period can be applied more widely across London. But whilst 'out-of-hours' deliveries can work for some businesses, it isn't necessarily the solution for all. For some micro and small businesses the costs associated with operating outside normal business hours are too high, and thus it is a hindrance rather than a help.

Congestion charges and levies and uncertainty about finding suitable loading and parking locations, together with a seemingly overzealous application of parking fines in some parts of London, have already resulted in many delivery companies adding a London surcharge to delivery bills. This is difficult for small businesses in London to

pass on to their customers, as it tends to make them uncompetitive with businesses based outside London.

Part-time workers and apprentices find travelling costs to and from their place of work particularly high. The FSB feels that more can be done in the form of flexible travelcards that offer discounts for these key workers. This will also help those not in employment, education or training (so-called NEETs), who cite the cost of travel as one of the barriers to their taking up employment.

The Mayor should explore with TfL ways to improve connectivity in outer London, avoiding the need to travel into the centre to reach other outer London destinations.

Solutions:

- Introduce a new flexible travelcard arrangement for part-time workers, apprentices (of all ages) and NEETs.
- Work with TfL to set up a business vehicle registration scheme similar to the one in place for disabled drivers, which can be used to register delivery vehicles and thus reduce the level of wrongly issued parking fines.
- Review delivery time restrictions and parking fine hotspots. It is important to see these as a failing in the system rather than as a revenue earner, and to investigate where simple changes can be made.
- Develop a more holistic strategy for freight and deliveries for businesses taking place around the capital.
- Consider trials of electric delivery vehicles, and incentives for businesses to use this service.
- The Mayor should explore ways with TfL to improve outer London connectivity, avoiding the need to travel into the centre to reach other outer London destinations.

Yours sincerely,

Sue Terpilowski OBE

London Policy Chairman

Federation of Small Businesses

London Assembly investigation into traffic congestion in London - FTA response

September 2016

About FTA

The Freight Transport Association (FTA) is one of Britain's largest trade associations, and uniquely provides a voice for the entirety of the UK's logistics sector. Its role, on behalf of over 15,000 members, is to enhance the safety, efficiency and sustainability of freight movement across the supply chain, regardless of transport mode. FTA members operate over 200,000 goods vehicles - over half the UK fleet - and some 700,000 liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight.

London and Freight

Freight plays a vital role every day in ensuring the capital can function. Road freight's unique ability to move freight literally from door to door determines its pre-eminent role in distributing goods and services throughout urban areas - ninety per cent of London's freight is moved by road. Over 360,000 tonnes of goods are needed to be moved by lorries across the capital each day. That's 15,000 tonnes picked up or dropped off each hour, or 250 tonnes every minute. And as this figure excludes vans, it is only a part of what road freight does. Anything that adds cost to road freight adds to the cost of living or operating a business in London.

Response to Questions

General questions

1. **How has traffic congestion changed in London in recent years? Are there differences in the amount, time and/or location of congestion?**
2. **What are the key causes of these changes in congestion?**
3. **What impact does congestion have on Londoners, the city's economy and its environment?**
4. **What can London learn from other cities in its effort to reduce congestion?**

Causes and effects of congestion

London's roads are increasingly congested. This can be attributable to population growth and therefore more people needing to move around the capital. However, those people also increase the demand for deliveries and servicing activity. London's economy is growing and that too will influence a rise in demand on the transport network.

Drivers of HGVs (goods vehicles over 3.5 tonnes) are governed by strict EU Drivers' Hours Rules which caps shift lengths. Therefore, if it takes longer to deliver the same amount of goods, logistics companies have to respond by increasing the number of vehicles used each day – which in turn compounds the congestion challenge.

As well as the Drivers' Hours regulations, lorries are also subject to many detailed operating requirements regarding the vehicle itself that must be complied with. In combination, the costs of complying with these regulations have, it is believed, encouraged some to utilise vans to do deliveries

that could be done by HGV. If the regulatory burden on HGVs increases over time, this unintended consequence would grow.

Vans also provide greater flexibility than HGVs and their use is expected to increase with our changing shopping habits and increase in personal deliveries. Some retailers are now even offering same day deliveries.

Click & Collect has become increasingly popular as it allows the customer the flexibility to collect their goods when it suits them. It also helps reduce aborted deliveries where there is no one home to receive their package. However it is unclear what the potential role of Click & Collect has on reducing commercial traffic overall, particularly if the demand for same day deliveries increases. The biggest reduction will come through the use of HGVs instead of vans.

It should be remembered that half of van use is not for freight, but for services (ie a gardening service or electrician carrying tools). As this area is a particular growth area in London, it will be part of the cause of the rise in van use.

To maximise London's economic health and manage the cost of living, it is important that congestion does not grow unchecked. There is an inherent transport cost in every 'thing' we buy. FTA figures calculate the cost of congestion for an HGV at £1 a minute, so congestion is a costly factor for servicing London.

Stop start traffic also has a significant impact on fuel consumption, emissions and air quality. According to information supplied to FTA by manufacturers, if you compare a lorry travelling at 30mph that stops three times a mile then gets back up to speed, and one that just cruises at 30mph, you see a tripling of emissions – any reduction in congestion will have significantly positive effects on emissions.

Charging for road usage

5. **How effective is the Congestion Charge? How should this scheme be modified?**
6. **To what extent would a usage-based road pricing regime help reduce congestion?**
7. **How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?**
8. **What would be the benefits and drawbacks of these other interventions?**
    - **Tolling for river crossings or other major infrastructure**
    - **Workplace Parking Levy**
    - **Devolving Vehicle Excise Duty to London**

Congestion Charging / Road Pricing

FTA supports the principle of the congestion charge and it has resulted in a significant reduction in the number of private cars in the zone. However, much of the rest of the traffic – buses, coaches, taxis and private hire vehicles are exempt. Freight vehicles, which play an essential and unavoidable role in servicing the central zone, are also subject to the charge. It is important to keep a check on whether road pricing would be an effective tool to change behaviour in logistics. Baring niche (but useful) work in water and rail freight, London's deliveries will continue, under any model, to be overwhelmingly done by road. The main change that could theoretically be made is to retime deliveries. There is already a significant cost penalty to delivering during the morning peak, but it is still used by freight because that is what customers require (i.e. goods available at the start of the working day).

If a charge is applied to freight but in the knowledge that it will not change behaviour, then it is simply a tax on servicing London. It can be expected that road pricing would have a more significant effect on private car use.

More needs to be done to enable deliveries and servicing activity to take place at different times of day (further details below). However, there will still be some that have no choice, but to operate in the Congestion Zone during the operational hours of the scheme. For those journeys, the Association believes that TfL could achieve much more by offering discounts and incentives for using cleaner vehicles. Since the abolition of the alternative fuel discount in 2010 there have been no environmental discounts available to HGVs or large vans (vehicles between 1.025 and 3.5 tonnes).

Ultra-Low Emission Zone and Emissions Surcharge

London still needs the same amount of vehicles to deliver the goods, so emissions requirements alone would have little effect on the number of vehicles or congestion, but incentives to operate cleaner vehicles would help operators decide which vehicles they send into the capital. In the short-term, FTA believes that those operating Euro VI HGVs should be offered a temporary discount from the Congestion Charge to encourage their use in London ahead of the introduction of the Ultra-Low Emission Zone. Incentives could also be offered for 'better than diesel' commercial vehicles such as electric hybrid and gas vehicles.

Tolling for river crossings or other major infrastructure

FTA accepts that charges may need to be introduced to both fund new infrastructure and to manage demand. However, any demand management measures implemented on new river crossings should be focused on those who have alternatives (i.e. private car drivers) rather than essential delivery vehicles which have little alternative option but to use the capital's road network.

In response to the Silvertown tunnel consultation, the Association raised concerns that the proposed modelling of the charging system (to charge vans and HGVs significantly more than private cars) will not have the deterrent effect required on those who in the main have an alternative choice – to use public transport – but will add cost to essential deliveries and servicing activity which has limited modal shift opportunities in the capital. This would simply be a tax on servicing London.

It should be noted that in general increased infrastructure will not increase freight vehicle activity (unlike private cars) – there is a set quantity of goods that need to be moved and enough vehicles will be put on the road to deliver it. New river crossings should not see a total increase in freight traffic.

In contrast to the current approach, Transport for London should model the effects of charging one price for all users – thus encouraging those that have an alternative to use it. There should also be lower rates for cleaner/greener vehicles in each vehicle category - more in line with the Congestion Charge system.

Measures to target specific types of vehicles

9. **How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?**
10. **To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?**
11. **What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?**
12. **To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?**

Reducing the number of delivery vehicles at peak times

Using the capital's roads outside of peak hours when traffic volumes are lower and journey times are quicker makes perfect sense for freight operators. However, many are prevented from doing so because of other restrictions such as the London Lorry Control Scheme (LLCS) and night-time delivery curfews. Advancements in vehicle technology and design mean that trucks are much quieter than they used to be and there is also an array of quiet equipment which can be fitted to make them even quieter.

Allowing deliveries to take place outside of peak hours does not just benefit the freight industry and its customers, but also brings big environmental and safety benefits. FTA believes that the time is now right for a full review of the LLCS. The scheme was introduced in 1986 to reduce the noise from lorries on the move. Whilst not a complete ban on lorry movements, it heavily restricts the routes they can take and results in some very long detours – meaning more fuel, more emissions and more cost. It is a blanket restriction on all goods vehicles over 18 tonnes and does not take account of the actual noise level of the vehicle – HGVs over 18 tonnes can be quieter than many smaller vehicles – the vehicle weight should not be the deciding factor. It operates between 9pm and 7am during the week (and from 1pm on Saturdays and all day on Sundays). So the restrictions end just as the rush hour starts – leading to even more lorry movements during the morning peak. Some operators avoid delivering during restricted hours altogether, whilst others switch to smaller vehicles - meaning more lorries to deliver the same quantity of goods.

The Association chairs TfL's Retiming Deliveries Consortium bringing together retailers, logistics providers and boroughs to encourage deliveries to be retimed out of the morning peak. As well as reviewing regulatory restrictions, and providing guidance on making deliveries quieter, work is also being undertake to encourage customers to consider how and when they are requiring their deliveries to be made. Another area that should be encouraged is the use of delivery and servicing plans by businesses.

Payloads of freight vehicles

Vehicle	Typical maximum payload
3.5 tonne van	1,100kg
7.5 tonne lorry	2,800kg
18 tonne lorry	9,000kg
26 tonne lorry	14,000kg
44 tonne lorry	24,000kg

Source: TWE Haulage

Some have suggested banning HGVs in peak hours. However, we have serious concerns about the unintended consequences that such a move could have. There is already an array of restrictions which impact on when and where deliveries can take place and particularly impact the potential for deliveries to be made at night and out of peak hours. We believe that if these were addressed, there would be less reliance on the morning peak. Simply introducing more restrictions is likely to lead to an increase in van traffic, emissions and congestion and result in a bigger concentration of freight traffic just after the morning peak, when pedestrian flows are likely to be higher – which would just shift the road safety risk. Adding further restrictions to delivery times will also mean that goods will not reach the shelves in time – for example fresh food for breakfast services. It will also increase the cost of transport – making London more expensive and less competitive.

Consolidation Centres

Consolidation centres are another initiative which can potentially reduce the impact of deliveries in a local area. However, it is difficult to get the business model to work so that they can be self-funding, and many tend to rely on local authority funding. It must also be recognised that a lot of consolidation already takes place in the supply chain and there is a danger that a fully laden HGV (the most efficient way to deliver) could be broken down and split across many vans – adding to emissions and congestion rather than reducing it. It is important to identify the types of deliveries which are best suited for consolidation and it needs to be on a big enough scale to work. The London Borough of Camden is

currently undertaking a consolidation trial where all deliveries to its own buildings are now made to a single location for onward distribution.

Encouraging modal shift

13. **How can TfL further encourage a shift from private car use to public transport or active travel modes?**

Modal shift for freight

Each freight train takes around 48 lorries off the road. Therefore to help alleviate road congestion around London and the south east, opportunities for rail freight coming from and to south east ports should be maximised. This requires the development of rail freight terminals to interchange freight between road and rail. FTA has set up the Mode Shift Centre (www. modeshiftcentre.org) to help senders of goods looking into the use of rail to get advice and make informed choices about modal switch.

The River Thames is the busiest inland waterway in the UK, carrying nearly 60 per cent of all goods lifted on the UK's inland waterway network. Department for Transport statistics show over 2.8 million tonnes of freight were transported on the Thames in 2013. These services help keep over 120,000 lorry movements a year off London's roads.

However, it is important to note that approximately 90 per cent of London's freight is carried by road, so even a considerable shift to alternative modes will only have a relatively small impact on the overall number of road freight miles. To be financially viable, the wharf or rail freight terminal also needs to be close to the delivery point, so its potential may be limited.

Providing new road infrastructure

There are proposals for new road infrastructure in London, including river crossings and tunnels, which TfL has considered or is now actively pursuing. These include, for instance, the Silvertown Tunnel across the Thames in east London, and a tunnel from A40 at Park Royal to the A12 at Hackney Wick.

14. **Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?**
15. **To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?**
16. **How should new road infrastructure be funded?**

New infrastructure

There is little space to build new road infrastructure in London, so the focus should be on making the best use of what is currently available. However, there are a couple of areas that should be explored further: improving cross-river road connectivity in East London and using tunnels to transport through-traffic within the capital.

Cross-river road connectivity in East London is extremely poor in comparison to West London. The Blackwall Tunnel is a key pinch point on the capital's network, it is unreliable and the regular congestion around it means the local area suffers particularly from poor air quality. East London is also a major growth area for new housing and jobs. But to ensure its success, it needs the infrastructure to underpin it. FTA fully supports the proposals for a new crossing at Silvertown and plans for additional crossings further east at Gallions Reach and Belvedere to create a network of river crossings in East London.

FTA believes there is an urgent need for new road river crossings in East London to reduce congestion, improve connectivity and support growth as new residential and business developments are constructed.

The proposals for the Silvertown tunnel include shared HGV and bus lanes in recognition that these are essential users making the most efficient use of road space. It is also a sensible way of ensuring that bus lanes are used as efficiently as possible whilst maintaining journey time reliability for the new bus routes which will use it.

Increasing road connections would not increase freight movements, as the same quantity of goods will still be required – indeed if we reduce journey times the number of freight vehicles required would decrease, relatively speaking.

Maximising available road space

17. **How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?**
18. **What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?**

London's roads are currently undergoing huge changes with the reallocation of road space to cyclists and the development of the new stretches of segregated and non-segregated cycling infrastructure. FTA supports the superhighway approach in principle, both the intention to engineer the roads to improve safety for cyclists, as well as to encourage more people to switch from private cars to bikes. However, it is essential that a sensible balance is achieved between the needs of different road users so that best use is made of limited road space to benefit London overall. The plans for the current generation of cycle superhighways were extremely rushed and did not allow enough time for industry's concerns to be addressed about how the routes would work in practice. FTA's concerns with the proposals were two-fold – access to the kerbside for deliveries and servicing activity and potential increases in journey times.

FTA recently surveyed members to see if and how the new Cycle Superhighways had impacted on their journey times. 79 per cent of respondents said that they had experienced increased journey times due to the new infrastructure and that this had either increased costs or impacted on their service offering. Just over half had increased the number of vehicles deployed on London's roads as a result. Two thirds had rerouted or retimed some of their operations to minimise the impact on journey times.

Other measures which could help reduce congestion and make better use of the capital's limited road space include increasing access to bus lanes in off-peak periods for HGVs, in preference to private motor cars and allowing HGVs access to underutilised bus lanes (more typically found in outer London) throughout the day. Also, improving loading/unloading and rest facilities in London, to reduce unnecessary travel whilst waiting/searching for spaces.

Conclusion

Congestion is a growing challenge for London as the population grows. It is in part a sign of a prosperous city, but if left unchecked could stifle the capital's ability to grow and thrive. There is no single cause of the problem and no single answer to solve it. FTA believes that the London Assembly should support a range of measures including:

1. Ensuring all road charging focuses on changing behaviour, not just raising revenue
2. Retiming of deliveries outside of the morning peak through:
    a. A radical review of the London Lorry Control Scheme.
    b. Increased access to bus lanes at quieter times of the day and night
    c. Encouraging businesses to request deliveries to be made off peak
    d. Encouraging boroughs to review delivery restrictions such as planning conditions
3. Carry out the construction of new river crossings in East London.

4. Properly assessing the impact of reallocation of valuable road space such for other uses such as Cycle Superhighways or pedestrianisation.

Natalie Chapman
Head of Policy – London
Freight Transport Association

From: Jenny Bates [redacted]
Sent: 16 September 2016 23:41
To: Transport Committee; Georgina Wells
Cc: Sophie Neuburg
Subject: Congestion investigation-Friends of the Earth response

Please find below Friends of the Earth's brief comments on your congestion investigation

To:
London Assembly Transport Committee
City Hall
The Queen's Walk
London SE1 2AA

From:
Friends of the Earth
The Printworks
137-143 Clapham Road
London SW9 0HP
Contact:
-Jenny Bates, Friends of the Earth Air Pollution Campaigner, [redacted]
-Sophie Neuburg, Friends of the Earth London Campaigner, [redacted]

16th September 2016

Thank you for the opportunity to respond to your investigation into London's congested roads: https://www.london.gov.uk/about-us/london-assembly/london-assemblys-current-investigations/londons-congested-roads

WHY IT'S A PROBLEM

- Air pollution – congestion can cause bad air pollution, and for a given volume of traffic its generally better that its moving than not. Also traffic levels need to be cut to tackle air pollution as there is no such thing as a clean car – tyre and brake and road surface wear contribute to PM pollution http://www.londonair.org.uk/LondonAir/Guide/WhatIsPM.aspx
- Congestion is bad for business, and so for the economy.

Both congestion and air pollution have kept London down at 38th place in a survey of liveable cities: http://www.telegraph.co.uk/expat/expatnews/10648488/Viennas-the-most-liveable-city-but-polluted-London-misses-out.html).

ACTION NEEDED

The only real way to cut congestion is to cut traffic volumes.

Planning and policy:

First this can be done by reducing the need for people to have to travel unnecessarily – communities should be developed so that key amenities and work opportunities are within easy walking and cycling distance as much as possible, and providing affordable public transport for longer journeys.

Also called Transport Oriented Development/TOD "The Institute For Transportation & Development Policy (ITDP) Has produced a TOD Standard, setting out eight key urban design and land use principles that cities should consider in planning and delivering TOD" http://www.c40.org/networks/transit-oriented-development

Further freight consolidation is essential.

Car clubs need to be expanded as these are shown to cut vehicle use.

London should re-introduce road traffic reduction targets – Oslo aims to "…reduce automobile traffic by 20% in 2019 and 30% in 2030" http://www.autocar.co.uk/car-news/green-cars/dutch-government-wants-ban-petrol-and-diesel-cars, and Barcelona has "…a new mobility plan to reduce traffic by 21%." http://www.theguardian.com/cities/2016/may/17/superblocks-rescue-barcelona-spain-plan-give-streets-back-residents?CMP=share_btn_tw

Charging / restricting vehicles:
The Congestion Charge has kept many vehicles out of central London.
London-wide road-user charging/pay-as-you-go driving is now needed, combined with a London-wide ULEZ.
Workplace parking levy should be used to disincentivise vehicle use.

Physical measures:
There should be more re-allocation of road space away from vehicles, to pedestrians / cycling / public transport
There may be some temporary increase in congestion but this would not be expected to last.
People tend to be prepared to queue up / be stuck in traffic up to a certain tolerance.
Not all traffic diverts to other roads and there is traffic evaporation, as people chose different modes as alternatives if these are made easily available.
If the roadspace is re-allocated to clean alternatives such as safe cycling that will facilitate modal shift.

Indeed it is essential when measures reduce traffic levels that the benefits are locked in by re-allocating roadspace away from vehicles.

Comprehensive measures can be put in place such as in Helsinki: "The Finnish capital has announced plans to transform its existing public transport network into a comprehensive, point-to-point "mobility on demand" system by 2025 – one that, in theory, would be so good nobody would have any reason to own a car. Helsinki aims to transcend conventional public transport by allowing people to purchase mobility in real time, straight from their smartphones. The hope is to furnish riders with an array of options so cheap, flexible and well-coordinated that it becomes competitive with private car ownership not merely on cost, but on convenience and ease of use." http://www.theguardian.com/cities/2014/jul/10/helsinki-shared-public-transport-plan-car-ownership-pointless

The more that London needs to accommodate population growth, the more important it is that investment is in the above – all of which will help free up space on the existing road network for both existing and new essential journeys.

NOT ADDING TO THE PROBLEM

Any thinking that adding road space will help congestion is short sighted – experts agree that this is ultimately counter-productive, and that we can't build our way out of congestion problems as generated traffic adds to overall congestion.

With new roadspace new traffic is generated, as driving becomes easier and new trips are created.
Induced traffic: Professor Phil Goodwin
http://stopcityairportmasterplan.tumblr.com/post/19513243412/induced-traffic-again-and-again-and-again
Transport expert John Elliott's slides showing when Blackwall tunnel was doubled from 2 to 4 lanes, traffic more than doubled within a year at peak time:
http://stopcityairportmasterplan.tumblr.com/post/20012814230/presentation-slides-arguing-the-case-against-the

John Elliott also has made clear that with more roadspace, more traffic in turn would overall worsen congestion in the area (not alleviate it), even though the pattern of congestion could change and even reduce in places.
If congestion was relieved eg at the Blackwall tunnel/Silvertown Link approach then it would just mean that traffic had got on to another area quicker and making congestion worse there.

This was found to be the case at the 4-lane Thames Gateway bridge/TGB Public Inquiry in 2005/6. The Inspector, in a rare planning inquiry win, recommended in 2007 that the scheme did not go ahead, saying that the "whole justification of the TGB is based not on reducing the need to travel, but on increasing it" (9.145), that it "would facilitate commuting by car" (9.146) and be "likely to cause increased congestion" (9.187).
Air pollution was one of the grounds the Inspector was not happy with - of air quality being made worse as a result of the TGB he said: "in an area in which air quality has historically been low, and where it is identified as a current problem, I do not regard that as acceptable" (9.416).
https://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008

An early report for Greenwich on the Silvertown road tunnel warned of "The likely outcome would be the exhaustion of the Silvertown Link capacity within a relatively short timeframe with exacerbated congestion on the local road network." and "This could only be mitigated by a new high quality public transport link, such as a DLR extension."
http://853blog.com/2014/05/06/buried-greenwich-council-report-criticises-silvertown-tunnel/

The Mayor must fulfil his commitment and properly review the plans for 3 new road river crossings in East London, properly looking at a package of non-road alternative measures to include crossings and complimentary measures.

ENDS

Jenny Bates
Friends of the Earth Air Pollution Campaigner
The Printworks, 1st Floor, 137-143 Clapham Road
London SW9 0HP
www.foe.co.uk

From: Fuller, Gary [redacted]
Sent: 13 September 2016 10:39
To: Transport Committee; Georgina Wells
Cc: Font Font, Anna
Subject: Traffic congestion in London - call for evidence

Hello Georgina,

I just read a news article about the GLA transport committee's call for evidence on congestion and also on the impacts of changes in traffic flow and composition.

Part funded by TfL we have been tracking trends in London's air pollution alongside roads and most recently how these are linked to changes in vehicle flow. Our recent study looked at trends in air pollution over a ten-year period spanning 2005 to 2014, using data collected from 65 roads.

This new view of city-wide air pollution revealed significant variability across with some roads showing significant decreases but others did not improve. Examples include:

- The notable improvement in nitrogen dioxide from traffic alongside Putney High Street where pollution abatement technologies were applied intensively to buses and the deterioration along Upper Thames Street where congestion appears to make it harder for exhaust abatement to work effectively.

- The improvements in airborne particles on Marylebone Road in central London where diesel exhaust technologies are yielding strong positive results, contrasting with the increase in particles alongside some busy roads in outer London including Westhorne Avenue, part of the south circular in Eltham. Alongside these roads the decrease in exhaust emissions may have been offset by greater emissions of coarse particles from dust resuspension and wear-and-tear on tyres and brakes from larger number of heavy goods vehicles (HGVs).
  The full paper is freely available at:

http://www.sciencedirect.com/science/article/pii/S0269749116305966

Please contact us if you would like us to explain the work further or if you have any questions.

Regards

Gary Fuller and Anna Font.

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INVESTIGATION INTO TRAFFIC CONGESTION IN LONDON

Introducing Gett and our commitment to better transport in London

Gett is a global technology company that enables consumers and businesses to instantly book on-demand transportation, delivery and logistics. We have state-of-the-art technology, with ASAP and pre-booking capabilities, 24/7 customer care, and a stellar user experience taking transportation to the next level.

The company first came to the UK in 2011 and since then has expanded to 25 cities across the country, including Manchester, Coventry, Edinburgh and Glasgow. In 2015 Gett became the first nationwide app for on-demand taxis.

In London alone, almost 11,500 drivers are part of the Gett fleet using our app.

Gett's transport solution works solely with fully licensed black cabs and, outside of London, Hackney Carriages; the company has made use of an existing fleet of vehicles, rather than putting new ones on the road. This puts Gett in a unique position as a provider of innovative, modern technology harnessed with and supporting one of London's most traditional and highly respected industries, its regulated licensed taxi industry. Our technology based services help secure a more efficient use of road space thereby reducing congestion and improving the public transport offering in London.

Gett fully supports the Mayor of London's ambitions to reduce traffic congestion in London. To remain a world class city that is open to the world requires a transport system that works and air that is safe to breathe. To achieve these objectives will require further policy change on road usage, led by the Mayor and TfL (which might include removing the Congestion Charge exemption for PHV vehicles). Gett is committed to working with them to help achieve this.

In the submission below we have addressed the questions posed by the Committee. We would also welcome an opportunity to give oral evidence to any inquiry that is held. We provide answers to all of the main questions below and reiterate in this introduction our view that there needs to be greater restrictions on the use of road space in London with road space priority being granted to those services that offer genuine public transport services. This includes the licensed taxi industry with its regulated services that include full wheelchair and disability access, regulated fares, highly trained drivers, credit card acceptance (from October) and ever increasing new environmental standards through purpose built vehicles.

QUESTIONS FOR REVIEW

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion

Gett has a fleet of around 11,500 licensed black cabs on the streets of London, so we can share reports from our highly trained, experienced drivers who drive London's streets every day, and the data provided by our technology which connects thousands of riders with drivers every day suggests travel times have increased by 10% in the past 6 months.

Although driver evidence is, of course, anecdotal, there is no question that the feedback is clear: congestion has increased dramatically in the last 36 to 60 months. In the annex, we address a number of pressure points, which while anecdotal, will no doubt be reiterated by other stakeholders. Drivers report difficulty navigating key arterial routes, including bridges and key connections through the city. It is worth noting that Gett's black cabs are entitled to use the bus lanes so reports from drivers may give some indication of the challenges growing congestion are also posing to the bus network.

2. What are the key causes of these changes in congestion?

There is no doubt that a key cause of the significant growth in congestion is the increased numbers of Private Hire Vehicles (PHVs) over the past few years - accelerated by the high number of part-time drivers who are often driving around central London without any passengers. This low utilisation of drivers and the corresponding number of vehicles on the road causes all professional trades to suffer from congestion.

In the Taxi and Private Hire Vehicle Statistics released by the Department of Transport in 2015, it placed the number of PHVs in 2015 at 62,800. This represented a 25.9% increase from numbers in 2013. The Travel in London Report stated that "recent technology change has seen the number of licensed private hire vehicles and drivers increase at a rapid rate – up by a net 27.2% and 41.1% respectively between 2008-2014, and up by 18.8% and 19.9% over the last year alone.' While it stipulated in 2015 that there was no direct link to increased traffic levels, average road speeds across London are falling to just 8.5mph (according TLRN Performance report 2015) and the connection to the increased volume of Private Hire Vehicles is apparent.

It was reported in January 2016[1] that the increase in PHV numbers has contributed to lengthened journey times by an average of 10%. With 2016 numbers of PHVs rising further (official figures confirm[2] there are more than 100,000 PHV drivers this year and some estimate this could rise to 128,000 in the next two years[3]), congestion will only worsen and average speeds on London roads slow further.

Some operators' strategy of providing vehicles 'on demand', across the capital, in just 2-3 minutes means that by definition their vehicles could be empty for extended periods. Gett's fleet of vehicles, for example, do not add any additional traffic to the roads as they use the existing licensed black cab fleet - Gett provides fast pick up times, on demand, without adding to the number of vehicles on London's roads. We do not see the value to London of so many additional Private Hire Vehicles if this increases journey times due to congestion: potentially quick pick up times are clearly negated by significantly extended journey times.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Congestion has had a significantly detrimental effect on London's economy, while a reduction could bring clear economic and environmental benefits. Congestion leads to both longer journey times in general, and unpredictability of journey times on a ride to ride basis, seriously impeding the ability of people to travel or to plan to travel around the capital, either for leisure or business.

Faster road speeds would also reduce the 'cost of congestion' for those caught in traffic. Traffic congestion has been estimated to cost more than £300 billion to the UK economy by 2030. In London, drivers spent more than 250 hours idling in traffic in 2013, double the UK average and this is set to increase to 299 hours by 2030. From 2013-2030 this is estimated to total £130 billion to the London economy, in both direct and indirect costs[4]. Alongside the economic costs of congestion it also reduces the quality of life for those using the roads in London.

Congestion is clearly an issue for London's businesses. Traffic unable to move around the capital is clearly a major cost and risk to London's economy. More specifically, there is a broader risk to London attracting a reputation for congestion and poor traffic management, something that could directly deter inward investment.

The health risks associated with London's polluted air are also severe and a reduction in congestion must be a priority of the Mayor's clean air strategy to help improve the overall wellbeing and health of Londoners. A study conducted by the London Air Quality Network, at King's College London and the Policy Exchange, found that reducing air pollution could see the average Londoner's life expectancy increase by 1.2-1.3 months. Furthermore, it is estimated that 9,400 people die from air pollution in London each year and 500,000 children aged under 19 live in

[1] https://tfl.gov.uk/info-for/media/press-releases/2016/january/tfl-sets-out-plans-to-modernise-and-enhance-london-s-private-hire-indust
[2] https://tfl.gov.uk/info-for/media/press-releases/2016/march/tfl-proposals-to-modernise-london-s-private-hire-industry
[2] https://tfl.gov.uk/info-for/media/press-releases/2016/march/tfl-proposals-to-modernise-london-s-private-hire-industry
[3] https://www.theguardian.com/uk-news/2016/jan/13/rise-in-london-minicab-numbers-increase-journey-times-by-10
[4] http://inrix.com/press/traffic-congestion-to-cost-the-uk-economy-more-than-300-billion-over-the-next-16-years/

areas that breach EU limits. Cleaning up London's air also has the added bonus that it will make the city more appealing not only to tourists, but also to businesses and to investors.

Reduced congestion would obviously have the effect of increasing road speeds across London and creating a better flow of traffic. This will especially benefit London's buses, and would encourage more people to use the bus as journey times would be lower. It is worth noting that on demand taxi journeys are not always 'point to point'. The new technology, used by Gett and others, allows Londoners to use taxis so as to cheaply and efficiently connect with other transportation methods - including public transport. Indeed it has often been cited by past Governments[5] (1997 White paper) that the London taxi is the multi modal link between various forms of public transport. It seems highly likely that the recent increases in traffic are adversely affecting air quality and also adding to the weight of excessive carbon emissions in London.

4. What can London learn from other cities in its effort to reduce congestion?

Gett would leave analysis of this complex question to others with more specific expertise but, as a global company, winning corporate accounts in our expanding number of countries, we do note that London competes for investment on the international stage. If other global capitals have better traffic flows and lower congestion, they will have a competitive advantage over London.

5. How effective is the Congestion Charge? How should this scheme be modified?

The congestion charge initially proved to be very effective in reducing congestion across London when it was first introduced. Only taxis, buses and emergency services were exempt. Since then there has been a western extension which was removed by Mayor Johnson.

The Congestion Charge should be modified to remove the exemption of PHV's from paying the congestion charge. As a result it would become very much more effective in reducing congestion. Feedback from the leading PH companies, many of whom are vendors to the One Transport platform (which Gett acquired earlier this year), is that they agree that this should be the case. Gett supports removal of the PHV exemption even though we would be directly affected by it.

On the introduction of the congestion charge in 2003 it was clear from the data provided by TfL that congestion across London did fall. The Central London Congestion Charging report, released in 2008, stated that cars and minicabs entering the central London charging zone during charging hours fell by 36% from 2002-2007.

As it is clear that the Congestion Charge does have an effect on congestion, it is logical to suggest that by removing the Congestion Charge exemption for private hire vehicles would lead to a reduction in their numbers in central London, within charging hours.

It is worth noting that a committed Private Hire driver would see very little impact on daily earnings from losing the congestion charge exemption: it would mean a few pence on each daily ride that would be unlikely to have any negative effect on his or her business. Removing the exemption would reduce the number of Private Hire Vehicles because it would deter a strategy where operators endeavour to work around the regulations by flooding the market with vehicles that spend extended periods empty. This only serves a strategy of attempting to secure a monopoly - it doesn't inherently benefit London. Instead, London would see fleets of committed PH companies and PHVs with high utilisation - fewer vehicles providing more rides, thereby reducing congestion.

[5] 1997 Government White Paper: *A New Deal On Transport;* Chapter 3 Integrated Transport - https://www.google.com/url?q=http://www.persona.uk.com/a5dunstable/deposit-docs/DD001-DD025/DD-020.pdf&sa=D&ust=1473699185327000&usg=AFQjCNEbgNqe1q1ynZQP4R3cbjzPqe2w7Q

6. To what extent would a usage-based road pricing regime help reduce congestion?

This is in effect road pricing. Road pricing is an effective way of controlling congestion. It is used in Singapore very successfully - the city launched the world's first digital congestion charging system as early as 1975. The system improved over the years, from a low tech manpowered system to where it is today where it has a hi-tech digital system, which is a usage based scheme, or Electronic Road Pricing (ERP).

Today 65% of the commuters in Singapore use public transport and air pollution reductions are consequently significant.

A higher utilisation of a reduced number of vehicles, (rather than a high number of vehicles with low utilisation) is the right strategy for London - removing the Private Hire Vehicles Congestion Charge exemption would be a significant step to achieving this.

7. How might the Ultra-Low Emission Zone and Emissions Surcharge affect congestion levels?

Gett support this in principle. Low emissions vehicles will be an absolute necessity for London going forwards. The London taxi industry will soon be rolling out an electric / hybrid 'black taxis' with zero emissions with the advent of the Frazer Nash MetroCab and the London Taxi Company's soon to be available TX5. When the Mayor of London makes subsidies available to taxi owners this will ensure the success of the project and be a real boost for London and the taxi trade.

8. What would be the benefits and drawbacks of these other interventions?

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's road, especially in congested areas at peak times

We would support an investigation into a nighttime delivery policy for London. This works well in many cities around the world. However there does need to be a continuation of just in time deliveries, to shops and businesses. Nighttime deliveries have been a real success in New York, with vehicle and delivery speeds improving and pollution reducing (http://www.citylab.com/cityfixer/2015/03/new-yorks-hugely-successful-late-night-delivery-truck-program-is-heading-to-dc/387496/)

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

As set out in answers to questions 2 & 5, the drastic growth of minicabs in central London over the last couple of years is certainly a major contributory factor adding to traffic and causing crisis levels of congestion, with 1 in 10 vehicles in the CC zone a PHV.

This issue could be addressed, as mentioned, by removing the charge's exemption for PHVs, which would reduce the numbers of those entering central London.

Moreover, resolving the issue of cross-border hiring is one which Gett would lend support to TfL and the mayor in their quest to change legislation.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

There is no evidence that car clubs would be workable in a first tier city such as London. The volumes necessary for on demand transport means that this is a low demand boutique style solution.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Efficiency of bus services is vital to keep London moving. Over the last sixteen years the numbers of buses has increased massively as a matter of policy and while it is true that bus ridership increased in the same period, it did not increase by anywhere near the same amount as the bus numbers. Consequently there are areas (Oxford Street for example) where dozens of empty or half empty buses sometimes crawl along at very slow speeds, deterring bus ridership and causing congestion around the whole area. Black cabs use the bus lanes so the congestion issues they are experiencing as a result of the growth in PHVs may also be similarly affecting the bus network. We would also suggest a review of the impact of tour buses, particularly in the West End and City of London, especially on weekdays.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes

On demand taxis provided by technology firms like Gett can help facilitate 'connected journeys'. So, for example, where public transport is rejected in favour of a private car journey, the efficiency of Gett's service may encourage travellers to use a Gett ride to connect into the public transport network, removing a private car journey from the roads. We would support further initiatives in this regard.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Gett supports investment in London's road infrastructure: underpasses and tunnels, albeit more expensive solutions, are nevertheless lasting and more effective than the alternatives.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

There is no doubt that as the use of fossil fuels in vehicles reduces, an ERP system (Electronic Road Pricing) based on time of day and usage will be become an increasingly viable way to address this issue, especially from a congestion point of view.

16. How should new road infrastructure be funded?

The TfL Congestion Charging & Low Emission Zone Key Fact Sheet January-March 2016 states that 16,000 PHV pass through the CC zone during charging hours on charging days. Removing the exemption for the congestion charge on PHV's would not only reduce congestion but could raise tens of millions of pounds a year for TfL, without any significant detriment to the committed Private Hire driver or the rider. This money could be invested in future projects across London. Potentially ERP might become a viable option as a result.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measure be made more effective?

Gett supports TFL's measure to limit roadworks and is aware of data showing these to be effective in reducing lane closures. The coordination and management of road works is a major issue. Lane rental schemes are one solution, however the use of responsible contractors plays a very significant part.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

The building and usage of CSH has caused significant challenges to the flow of traffic and increase in pollution due to stationary vehicles. However Gett does support having segregated lanes for cyclists. One challenge is that with the limited space available in London, this has been a major contributory factor in increasing congestion in some areas. Using technology to create some form of part time segregated lane may have been a better solution, such as rising bollards for example.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Gett is a pioneer in transportation technology and has extensive data on traffic flows and congestion levels. We would be very happy to work with TfL on any project aimed at managing congestion.

20. How effective has the Road and Transport Enforcement team been in tackling congestion.

We are not aware of any success in this area.

Annex 1

Drivers comment regularly about passengers exiting their taxis because of a lack of progress saying that they “will walk or take the Underground.” This raises serious questions for those with mobility issues who are not able to do this, and of course for the experience of visiting investors and the business community.

Drivers give a number of specific examples:

- Traffic not moving on London Bridge northbound for 15 - 20 minutes in the morning weekday peak between 8am and 9:30am.
- The approach to Tower Hill and Upper/Lower Thames Street (westbound on weekdays) taking over 35 minutes to complete 650 metres.
- Victoria Embankment (eastbound) taking between 30 to 45 minutes, on a weekday afternoon, to complete around 1,500 metres.
- Oxford Street becoming a procession of empty buses and taxis at many times of the day as passengers alight to walk.
- Elephant and Castle has been another spot where traffic has been at a standstill habitually for periods of up to 30-40 minutes, as has Gardeners Corner, Whitechapel, eastbound after 4pm weekdays.
- Cannon Street, Eastbound during the working day, but especially around 4pm, can take 25 minutes to complete 500 metres and Queen Victoria Street approaching Bank Junction similarly.
- The Strand Eastbound and generally all of the flows to and from Trafalgar Square have been an area of severe congestion for a number of years now; this has a ‘knock-on’ effect in the surrounding area.
- Tavistock Place Bloomsbury, has been the recipient of new traffic schemes which has caused serious unnecessary congestion and bottlenecks. This is both eastbound and westbound and unsurprisingly is also causing considerable knock-on effects throughout the whole locale.

The picture is clear: although London has long had a challenge with traffic volumes, the capital in recent years is developing a serious congestion problem that is impacting the ability of Londoners to move around the city.

There is also no doubt listening to drivers (almost all have similar anecdotes to tell) that there are vastly greater numbers of Private Hire vehicles on London’s streets. Many are empty, waiting for rides, which can cause blockages to key thoroughfares.

It should be noted that traffic in central London has many variable influences, including the seasons and the weather. But the evidence from our drivers is that overall volumes have risen dramatically in recent years.

From: Robert Scott [redacted]
Sent: 15 September 2016 10:10
To: Transport Committee
Subject: Meeting on Congestion 7th September 2016

Hi,

My name is Robert Scott and I am managing director of a company called GLH.

We are a private hire and courier company based in London and will have been in existence for 50 years in 2017.

My colleague, Zoe Walsh, and I have recently begun attending quarterly meetings with TfL as representatives of the private hire industry and I am to attend TfL workshops on van vehicles with regards low emissions as a representative of the same day courier industry. These consultations have been and I am sure will be very constructive.

I was pleased to see there had been a meeting arranged on congestion on 7th September. It is certainly an issue in London!

However, I was slightly disappointed by the fact that there was no representation from the private hire industry in this meeting or, from what I can see, the same-day courier industry. Both industries effect and are affected by congestion in London.

I think both industries should be included in any further discussion as they are cited in the introduction to be discussed in terms of how they impact on traffic congestion in London.

I am sure that the private hire industry would have a beneficial impact on any discussions had and could maybe throw some light on any questions posed. It is certainly within our interests as both a company and as part of an industry to be kept informed of what is going on and help to come up with some great solutions for this great city. The same goes for the same-day courier industry which takes into account van, motorbike and pedal-bike couriers.

Best regards,

Robert Scott

Robert Scott
Managing Director

GLA TRANSPORT COMMITTEE CONGESTION INVESTIGATION

THORNE HOUSE
152 BRENT STREET
LONDON NW4 2DP

GMB Professional Driver's Branch.

Our membership is made up of those who drive professionally for a living and those who also assist them.

GMB membership Includes Private Hire Drivers, Taxi (Hackney) drivers as well as delivery, ambulance drivers, vehicle valets and Parts Delivery Drivers.

We also have a number of small private hire operators within our membership.

A large proportion of our membership is self-employed.

We have a close working relationship with TFL and have been responsible for working to help create and work on the legislation in place today from work on sight and diabetes for drivers to the bus lane signs available for Private hire vehicles in London.

Our London membership is substantial and growing and is made up of Both Taxi and Private Hire drivers.

We have links with many safety groups and other trade bodies.

Our branch maintains cordial relations with many licencing authorities.

The GMB has had recent contact with most assembly members and the Mayor in relation to the needs of both Passengers and drivers in London and its environs and this submission is a clarification of our concerns and suggestions for the future of Private Hire and its role in London.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Congestion has become a greater issue in the last 7 years based on multiple factors.

Where certain days of the week or times of the day as an example Friday afternoon were known to be congested and individuals or companies allowed for this in their scheduling.

Now many factors can change the dynamic in London.

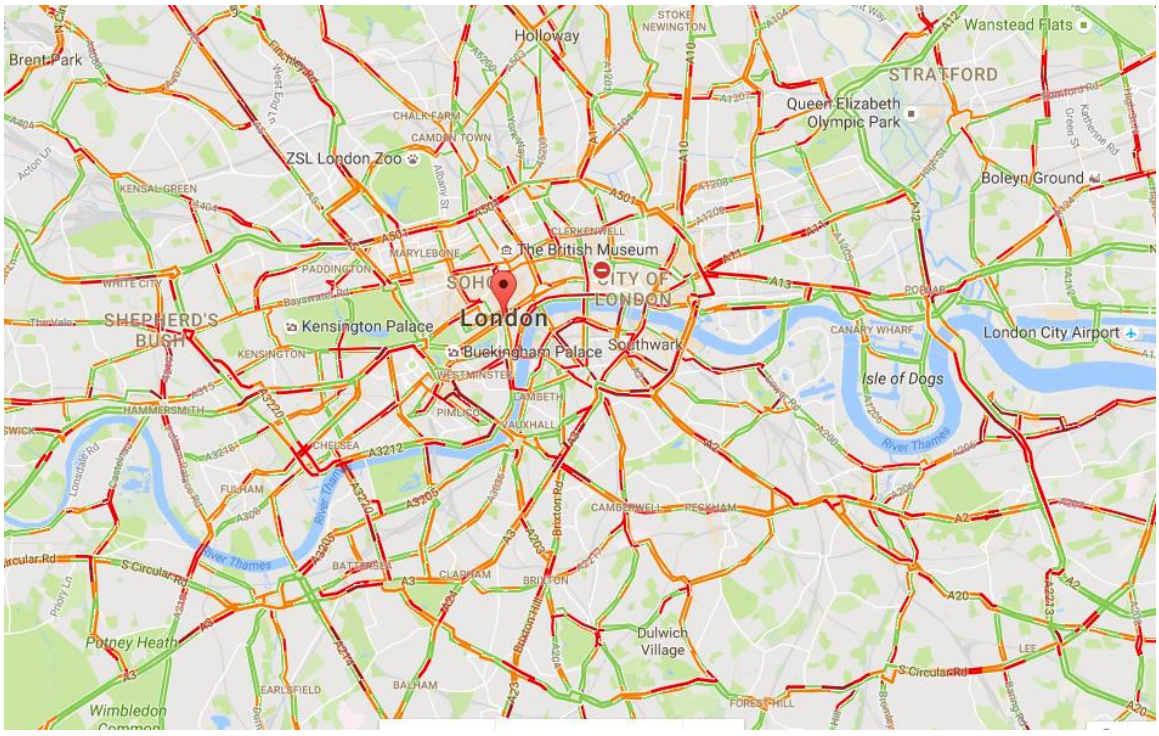
A simple accident or a vehicle delivering and stopped in the wrong location can create gridlock in matter of minutes.

The A13 as an example is a good example where just a coach breaking down can cause major disruption in all directions including in to the city of London.

Delays are excessive and now on a daily basis including weekends.

The Map below shows congestion in red.

In this case late on a weekend afternoon.



Unless we recognise that this is also a night time issue too and reconsider how engineers and politicians design our roads we are walking in to a more intense version of the map shown 24/7.

2. What are the key causes of these changes in congestion?

Reduction of road space due to lack of comprehensive impact studies on schemes such as the Cycle Superhighway.

Erosion of space due to large developments incursions during build phase with frequent loss following development including pavement and bad junction planning.

Computer models and presumptions by engineers are not enough.

A committee of individuals who drive in the city would assist in considering road changes to give real feedback before implementation of 'improvements'.

3. What impact does congestion have on Londoners, the city's economy and its environment?

The issues related to congestion include damage to economy based on delays of individuals and merchandise in traffic. Overtime costs increase as well as overall time delays in reaching appointments or keeping to schedule.

Overseas visitors see London in its worst light as congested and unable to control flow.

This effects potential business and those considering locating in the capital.

Environmentally the damage caused to individuals including road users is immense and has already garnered enough concern to seek even stricter restrictions on Vehicles and equipment used in building and construction.

Increased medical costs no doubt have an effect too based on the emissions imbibed no doubt also causing sick days for individuals working in such an atmosphere.

4. What can London learn from other cities in its effort to reduce congestion?

At present when entering Low emission zones in Germany a emissions sticker is mandatory and needs to be purchased in advance.

Vehicles without an emissions sticker are not permitted to drive in any low emission/ environment zone.

It would be mandatory for overseas vehicles to buy a Emissions / Congestion sticker for those without would be subject to a fine including cost of tracing and enforcing in the home country of the vehicle.

It is important to note this is a Motoring offence in Germany and it is endorsable.

There is no reason or excuse why this should not be the case in London as clearly it is the Law in Germany and they enforce on foreign owned vehicles.

In short there is no defence that can be made to not adding this to any statute or plan.

France has specific rules in relation to HGV movements on certain times and days.

Moscow allows no trucks during the day.

Most European countries do not allow any vehicle over 3.5 T access during weekends or in the run up to public holidays.

This create allow less congestion of roads.

We would add that if this works in most of industrialised Europe we see no reason why it should not work perfectly in London.

5. How effective is the Congestion Charge? How should this scheme be modified?

We suggest the following remedy:

A congestion zone with price bands.

Highest congestion charge between 6.00 AM and 9.30 AM and 4.30 PM to 7.30 PM and standard charge at all other times.

In outer districts

If we can reduce the number of private cars entering the capital it will also reduce the number of RTA and it follows with less road closures through minor accidents, will improve traffic flow and emissions.

Additionally, Trucks must have four times the charge as the commercial entities using London have too lower threshold It is clear to all that large trucks cause congestion as well as enhanced emissions due to their larger capacity engines.

We have run what some would say is a unsophisticated look at this problem and agree that at peak time the roads are full of cars that are only used for A to B journeys and during the working day the roads are used by mainly working vehicles which are a necessity for an economic working city.

We would suggest that dispensation is allowed for drivers that enter the zone on an occasional basis to visit hospital, or other needs where driving is the only method on that "odd occasion" or in the case of Brown and Blue Badge Holders or those with specific needs which preclude them from public transport use.

The dispensation would mean that these drivers pay the standard congestion charge at any time of day.

With the all night tube and cross rail coming it seems that it's probably time for congestion charge 7 days a week.

6. To what extent would a usage-based road pricing regime help reduce congestion?

We believe for Office commuters a higher charge for travelling between 06.00 to 10.00 AM and 15.00 to 19.30 Would stop some levels of congestion.

Haulage contractors and delivery services should be charged on a time in zone fee operating 24/7 with low rates in the early hours.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

These charges will make little difference where charges can be laid off against costs charged to end users by business.

Unless rates are more draconian and options for entry become more limited they will have little effect.

8. What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London

A levy on corporate parking is a plausible solution to creating a reduction however a charge that is comparable to daily travel is not enough it would need to be greater to see the value in using public transport.

Tolling for river crossings creates a division between North and South London and is

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

The Freight Transport Association have been looking at reduced emission targets but we have certain ideas which will fundamentally alter commercial vehicle usage in the Proposed ULEZ and thought London.

Firstly we propose a 7.00 AM to 7.00 PM curfew on certain classes of HGV and Delivery Trucks and Vans not only will this reduce emissions but will free up valuable road space during the day.

This will allow improved access and lower emissions as traffic flow will immediately improve due to junctions not being blocked roads space will not be reduced due to delivery's taking place and traffic control waits will be shorter.

A Shared payload scheme so that those making deliveries can share costs and reduce the need for additional vehicles.

With the HGV ban add other European city's do this Paris and the French motorway network restrict their access at certain times and days of the week.

At the very least we should be looking at HGV unloading ban on busy routes at least at peak times as this causes increased congestion and emissions due to the disruption of traffic flows.

Likewise queuing of HGV outside construction sites causes serious disruption to traffic flow. This must be considered when site managers and developers are given planning permission.

Transport Hubs.

We believe the institution of strategic transport hubs would allow larger more polluting vehicles to offload and smaller more environmentally friendly vehicles then be used to distribute product.

Only at certain hours would larger vehicles be allowed in to the Zones at a higher cost.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Attempting to blame private hire for this issue is nonsensical based on 50% of Journeys being carried out as In and out by Commuters and the high levels of HGV and Delivery vehicles on London's roads.

The proportion of private hire journeys in London does not match the hysteria created by others attempting to damage private hire and its driver's incomes further.

We would add that not all of the private hire vehicles involved in the increase use the central environs during the existing congestion charge period.

Any attempt to tax drivers who are known to be some of the lowest earning members of London's population would be detrimental.

There is also a question of apportionment for the charge for journeys and if unscrupulous operators may charge more than once for a congestion based journeys.

Likewise asking operators to become in essence tax collectors for the GLA would not only prove expensive to administer it would be still directed towards drivers.

Individuals who may use an out of Congestion zone operator will not be prepared to see a huge increase on their fare potentially losing further business to drivers who are already feeling the pinch due to overcapacity and already reduced rates.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Car clubs such as Zip Car seem to suit local residents more than the outside zone drivers.

Whilst suggesting shared cared use over ownership this suits urban spaces but is less appealing to suburban situations.

Unless similar car clubs are offered in all boroughs with sufficient levels of vehicles this will not assist.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Only by increasing the charges made for using private cars or introducing smart boxes (This becomes of concern on a privacy perspective.) can a shift occur.

A special set of rates for public transport at certain times of day will assist as would family tickets and booster tickets based on one individual's season ticket granting discount to family members when travelling together.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

In our view tunnels may be a key component of movement and reduction of congestion.

A route out towards Park Royal and on to the M40 would reduce congestion and speed journeys.

Likewise a tunnel from Vauxhall to Croydon would improve travel times to Gatwick and Surrey

The A86 in Paris is a good example of a Tunnel improving traffic flow.

A route from London to the M1 again would make total sense and reduce congestion in suburban areas.

Over engineering for the cycle superhighway has now created further damage to traffic flow as no testing was carried out prior to implementation.

The reality is quietways would have added a few minutes to cycle journeys but not impacted traffic flow as greatly as is now experienced.

With the need to rebuild the westcross route will be necessary based on similar issues with Hammersmith at this time a two way double bridge would make more sense.

Also whilst Average speed systems have been implemented on the A40 to improve safety it would appear accident rates and delays have actually increased.

A return to increased speeds at certain times would improve flow.

We believe the same is occurring on the A13.

We recommend further river crossings too as London is too reliant on existing options.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

There is no data to claim such encouragement occurs. Individuals seek the fastest and most pragmatic route if a new road enables this then of course it will be utilised.

16. How should new road infrastructure be funded?

Developers should pay an increased fee based on projects in London.

It should be remembered that especially larger developments not only increase road usage in and around them but also put further pressure on sewerage and water mains.

This in turn can create further issues when mains burst as road space is lost and even surfaces become damaged.

A fee should be recovered from foreign vehicles entering the city.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Why do many large buses need to run on off peak and low usage routes when smaller buses could be used?

Surely a Mini Version of a Double Deck Bus would be more cost effective use less road space and create fewer emissions.

TFL own figures show bus use has gone down for the first time in years.

This has been partly caused by low cost car services offering a below real cost transfer service.

Unless rates are increased by way of a minimum living fare and congestion issues are solved this will continue in our view to diminish.

Whilst the Whiterose paper from 1984 claims that smaller buses do not work, patterns in London are different and have evolved in the intervening period.

Based on this a stale argument that adding a smaller vehicle to the existing bus fleet is not only inaccurate it is baseless without a redeeming argument beyond the need to buy alternative vehicles.

A good example of cost savings using smaller low cost vehicles in Dallas are a case in point.

Benefits include.:

Reduced road damage
Lower costs per passenger mile
Lower Emissions
Improved Disabled access
Praise from the travelling public.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

Clearly the incursion not only of lane works but building works which force pedestrians in to roadways which are reduced in width also have their part to play.

Developers must be charged for removing pavement access during the term of their development taking road space up with barriers for pedestrian flow costs road space too.

Temporary lights and Banksmen who have no idea how to control traffic also causes huge issues and unless real training is undertaken problems such as blockages whilst HGVS deliver or emerge from sites will continue to create extended issues.

Roadworks regardless should be worked 24/7 so that emissions and delays can be minimised.

Residents who are inconvenienced should be compensated too.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

Due to the lack of impact studies and real modelling rather than computerised modelling the erosion of road space has been hugely detrimental from a traffic flow, emissions and a business cost perspective.

Urgent reconsideration of some of the routes must be undertaken and alternatives found.

Some parts of London are now no go areas.

This also has an effect on commercial visitors to London and where they choose to do business.

Private hire drivers cannot make money if they are stuck on a £7 Journey before costs for over 1 hour.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Due to the fact that buses only comprise part of the transport make up for London a solution for cars may be in plausible. A version for HGV and delivery vehicles may be possible.

Also less technological options should be considered such as set times for specific companies to be in congested areas or similar options as suggested in the run up to and during the London Olympics.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

We have no direct knowledge and therefore cannot comment on this aspect.

Conclusion.

Those in the vicinity of emissions are clearly at risk for motorists, pedestrians and cyclists the imbibement of noxious chemicals and debris must be reduced for all.

We hope a happy medium between business and the greater population's needs are considered when looking at proposals for this improvement in London's air quality.

However with a 25% reduction In road space in some places such as Victoria embankment we note that areas in the immediate super cycle highway has seen an increase in emissions.

We also have to have a full impact assessment on CSH 11 before it proceeds to prevent previous errors.

As we understand no such assessment for the current CSH routes took place prior to implementation.

Removing of road space has created rat runs which HGV use such as in Camberwell.

This was highlighted recently in the Evening Standard after a petition was handed in as emissions are affecting schools and quality of life for residents.

In short a greater level of modelling using real data rather than supposition must be used when starting projects which may end up increasing toxicity levels.

We do not accept that exemptions for vehicles providing private ambulance service, Medical Supply delivery or any commercially owned vehicle should be exempt from any charges for zone usage.

If the individuals or companies are working for commercial gain then they should pay as any other road user would for zone access.

We also would endorse banning Pedicabs of any variety from the zone as the congestion and delays created by them only add to static and stagnant gas formation.

We recommend recovery vehicles on standby at peak periods on main arterial routes to clear accidents and breakdowns which will increase traffic flow. EG M4/A4 , A406, A13 M1(London Environs)

Also stricter emissions testing for London vehicles.

Most importantly Ecopar (Scandinavian Standard diesel fuel) at All filling stations within the M25. This creates cleaner emissions.

Questions in relation to our response can be directed to:

Steve Garelick – Branch Secretary [redacted]

Simon Rush – Branch President [redacted]

Press Office - [redacted]

LondonAssembly

Investigation into traffic congestion in London - Transport Committee

General questions

1.How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion.

Traffic jams caused by the road modernisation plan in London and other roadworks throughout London have caused many extended journey times for motorists and buses in the capital, with regular unplanned roadworks appearing at various locations. The introduction of cycle super highways and the amount of road space removed from public service vehicles is bordering on disaster. The volume of traffic has also increased, particularly construction traffic, internet delivery vehicles and taxis/minicabs.

2. What are the key causes of these changes in congestion?

The key cause is a booming London economy, increasing population and as stated above, the reduction and inability to move goods and people in a timely manner. Also as public transport becomes more crowded and therefore less reliable, people seek other alternatives.

3. What impact does congestion have on Londoners, the city's economy and its environment.

Congestion, if allowed to continue will choke off the London economy substantially reducing the financial contribution that London makes to the UK as a whole. In addition, as traffic moves slower, the effect on air quality has worsened further.

4. What can London learn from other cities in its effort to reduce congestion?

European countries have much wider streets, London continues to miss this point. Areas such as Victoria Street which have been redeveloped from Victoria station to Parliament Square. This would have benefited greatly by moving the building boundaries 3 meters from the pavement which could be recovered by an additional storey, thus providing a safe cycle lane without impinging on London's bus services which serves a greater number of people than any other transport provider. Road pricing in other cities such as Singapore has reduced demand, but public transport has to be invested in to meet this demand.

Charging for road usage

5. How effective is the Congestion Charge? How should this scheme be modified?

The congestion charge has been met with varied opinions with some fond of the idea and others thinking that it makes no difference to traffic congestion and journey times. The current daily charge of £11.50 is a deterrent for standard motorists driving into the Centre of London but this cannot be avoided for businesses. The congestion charge boundary needs to be pushed out further. A special cut in parking bays should be available to goods delivery vehicles to allow free movement of other traffic in the street.

6. To what extent would a usage based road pricing regime help reduce congestion?
It would have a detrimental effect on people going about their business, but I believe it is a regime that we have to introduce to ease congestion and improve air quality.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?
The low emission zone has to be a number one target in order to protect the health of those living in central London together with those who travel into Central London in order to sustain a booming economy. However banning vehicles from Oxford Street and increasing the congestion in the surrounding areas cannot and will not improve the health of people living or working in London. Less vehicle numbers and freely moving traffic is the answer to this problem coupled with cleaner engines which will require support from central government.

8. What would be the benefits and drawbacks of these other interventions?
- Tolling for river crossings or other major infrastructure
- Working Parking Levy
- Devolving Vehicle Excise Duty to London

Devolving excise duty to London will allow greater modification to street structure and possible tunneling of ring roads. All of the above will deter private car use, but the alternatives you give people have to be viable, walking, cycling and public transport.

Measures to target specific types of vehicle

9. How can the Mayor and TFL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?
Night deliveries could be introduced between midnight and 5 am. Freight hubs and consolidation of freight could also be considered.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how can the Mayor and TFL encourage these?
Hugely, most of which carry one passenger, leaves us with a huge overcapacity of both licenced and unlicensed minicabs. Enforcement needs to be stepped up to remove the dangerous practice of unlicensed cabs.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TFL encourage these?
It is obvious that if 4 people travel in one vehicle this means 3 people have left their cars at home and this would be a contribution to less congestion. It will also pick up the occasional use demand but it has to be more widespread to be more effective.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?
Added congestion caused by super cycle highways and roadworks has caused the loss of 70 million passenger journeys in the last year from bus services in London.This is a figure that is well documented and recognised by TfL and until the reliability of bus services is restored, numbers will continue to decline.

Encouraging modal shift

13. How can TFL further encourage a shift from private car use to public transport or active travel modes?

As in the late seventies the debate on bus -v- car was:

1. **Additional buses on the street of London**
2. **Demonstrate a commitment to a fast and efficient bus service**
3. **Make it more affordable**
4. **Improve customer service**

This shift in policy had attracted a cost which slowly diminished as the passenger became used to a fast and efficient bus service.

We have come to a point in 2015/16 to removing road space from public transport to super cycle highways. This has reduced bus speeds to between 4 and 11 mph, as a consequence of this, 70 million passenger journeys have been lost in the last year, and some of them will have inevitably returned to their cars.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

The outer and inner ring roads should be tunneled, this will alleviate surface road congestion. The introduction of London having a restrictive tariff could help ease congestion and finally more bus priority that makes the service more reliable.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

It can be avoided by providing a fast and efficient public transport system, in turn this should reduce car usage in London; road pricing will also deter car drivers.

16. How should new road infrastructure be funded?

For a three year period the lottery fund should be used to renew and rebuild London's infrastructure; i.e roads, rail and underground. In addition, a business tax could be applied as the economy improves and London's roads start to function more efficiently.

Maximising road space

17. How effective are TFL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

TfL is completely ineffective in any noticeable limit of roadworks. It is still uncoordinated, too many 'emergency' roadworks being allowed.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

Cycle super highways are devoid of any measurable usage between October and March and are limited to rush hour am/pm peak, after which they leave large parts of London seriously congested, plus, until it is mandatory for cyclists to use them, a large number will still continue to use unsegregated road space.

Active traffic management

19. How can the use of technology be enhanced to help TFL manage congestion? For instance, how can the i/bus be used for this purpose?

TfL have no end knowledge about congestion, as they are party to a method of control called 'gating' which only leads to the congestion being shifted from area A to B, it does not have any effect on elimination.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

Giving enforcement teams vehicles to travel around in adds to the congestion already in existence. They have had limited success because something more drastic now needs to be done to get the function of roads moving again, they are a sticking plaster when we need major surgery.

Submission from GreenRide Sharing Limited

I will lay out my thoughts around the traffic congestion call for evidence document and let me know if you need supporting evidence for particular points.

I can see from the document that none of the questions focus on single occupancy private vehicles, which is the issue GreenRide is trying to tackle in London.

Any analysis of the capitals congestion needs to consider **utilisation** and **efficiency** of capacity.

The problem and current progress

Train satisfaction surveys shows that London franchises have record low satisfaction rates, particularly for the category "satisfaction with space to sit or stand". On roads, London's drivers lose an average of 101 hours per year to traffic which is 40% higher than elsewhere in Europe. Various estimates have put the cost of this to the London economy between £4bn and £8.5bn. However, with an expected 20% population increase by 2031 current use of capacity is clearly unsustainable.

This situation is regardless of the positive policies to discourage private car ownership which have had success e.g. congestion tax & focus on cycling/walking modes. The recent growth of car clubs is also positive however business models have not created a way for this be a cheap option i.e. a viable alternative to car ownership on any tangible scale. Private sector solutions have mainly led to an increase in private hire vehicles at the expense of traditional taxis, which had contributed to more congestion rather than reducing it. It can however be argued that solutions such as UberPool at least has the potential to reduce private hire vehicle numbers.

Whilst there has been some progress in reducing private car numbers, there has been little progress in increasing capacity of cars on London's roads. There are no incentives to drivers to make their cars high occupancy. Incentives seen in other countries include preferential route access (access to high occupancy or public transport lanes), cheaper parking and lower/eliminated tolls or zone taxes.

Utilisation

The UK average occupancy in cars is 1.6 people with London broadly in line with this. However, London commutes have an average of 1.2 people and our analysis of 2011 census data shows some outer London areas are as low at 1.06.

This means that there is significant unutilised capacity on London's roads and potential to reduce number of cars if the same number of people were transported in higher occupancy cars.

The solution to doing this is to encourage the activity known as car sharing or lift sharing. There are many interchangeable and often misleading terms for this but the principle is non-commercial drivers offering up empty seats on the journeys they are already doing to passenger doing similar journeys.

A major reason for the ambiguity of the terms, which is incidentally causing a barrier to genuine car sharing, is the recent activity of the private hire sector in adopting the misleading term 'ride sharing' – mainly as a clever ruse to gain advantage over licensed taxis.

It is important to note the differences between this private hire activity and genuine car sharing, as they have opposite impacts on traffic congestion.

- Car sharing is sharing rides on journeys the driver is already doing. Therefore, the passenger need is not creating a new journey, unlike private hire vehicles who perform the journey specifically to carry out the passengers need.
- Car sharing will only involve payment by the passenger up to levels deemed to be "cost sharing" as determined by the government/HMRC. This parameter is called the Mileage Payment Allowance which is 45p per mile. Amounts received above this threshold is considered profit making which is what private hire drivers do.
- Profit making activity requires special private hire licensing. Car sharing is a non-commercial activity.
- Car sharing is generally an activity encouraged by insurers and they state that as long as the driver only recovers costs (i.e. not making a profit), a drivers' current ordinary insurance covers this activity. See http://bit.ly/2cV1cnu. Profit making activity however requires private hire insurance.
- Taxi sharing and services like UberPool are the sharing of taxi or private hire rides. This is different to car sharing since, allow passengers are sharing, the journey is being done by a driver for profit and specifically for those passengers.

I believe that a clearer recognition of the differences should be made by city hall when determining how car sharing can help tackle traffic congestion whereas private hire activity typically adds to congestion.

This is particularly topical due to the recent legislation against the private hire industry, largely targeting the activity of Uber services. Whilst this is clearly targeted at private hire activity not car sharing I am worried that the response to the issues presented by Uber have the potential to bring car sharing in to the debate. The legislation itself mentions things like "controls on ride sharing". It is unclear, due to the ambiguity mentioned above, whether private hire activity is the sole target here – though it does refer to being "in public vehicles". Indeed, statements made by City Hall representatives and TfL make it seem that car sharing is being grouped together with private hire activity.

- The mayor has indicated that policies are angled to promote the use of traditional taxis.
- The issues raised with UberPool seem to be on the basis of safety, so presumably similar concerns exist with car sharing
- The CEO of Liftshare.com (the UKs main car sharing company) stated in an interview that they previously worked closely with TfL for a long time but 6 years ago TfL ceased this relationship as pressure from the taxi lobby meant that TfL made getting people in to taxis their priority. Pressure from Ubers success no doubt has exacerbated this.
- Previous statements by the Assembly members seem to confuse the non-commercial activity of car sharing with the commercial activity of private hire drivers.

I am therefore concerned that the issues presented by Uber's price undercut of the taxi market has led City Hall to adopt a taxi vs everything else attitude. If true, then this severely restricts progress against single/low occupancy cars.

I have made numerous attempts to contact City Hall to get understand their position but have thus far not received a response.

Summary on utilisation of capacity – distinction between car sharing and private hire activity should be made. Recognise car sharing as a traffic congestion reducing tool and encourage and promote the activity. On concerns such as safety city hall should engage with car sharing platforms as they are typically all social enterprises that want to create strong and safe communities.

Efficiency

Car sharing in London, like all modes of transport, are largely disconnected within the transport ecosystem. Greater efficiency could be achieved if services are more connected.
In Germany, car sharing company Flinc received investment from Deustche Bahn the German public transport company. Integration has since occurred and Flinc is effective in getting people to public transport points, being part of a multi modal user journey and listing as a transport option on the public journey planner tools.

Other forms of connection include common payment systems across multiple modes to allow greater access to users.

The Flinc example is in contrast to London's progress on this front. I mentioned above TfL's move away from cooperation with companies such as Liftshare.com and the difficulty experienced by SME's such as my own in communicating with city hall. These lines of communication need to be open to the tech and start-up communities because we want to engage and listen to city hall priorities and concerns so that these are best addressed in our value propositions. I have heard that some cooperation between TfL and car clubs is on the horizon which is a promising.

The taxi focus mentioned above also needs clarity. It is estimated that driverless vehicles within the next decade have the potential to make traditional taxis redundant and reduce inner city congestion by up to 90%. How will City Hall make this transition? Dynamic car sharing companies such as GreenRide (GreenRide is the only dynamic car sharing platform currently in the UK) operate on technologies that will be highly relevant to driverless vehicles/taxis to enhance their efficiency. Therefore, a focus on a more dynamic on-demand transport ecosystem is a means of increasing efficiency today and preparing for tomorrow's innovation.

Let me know if you require references for anything I mentioned above. I would also like to request a short meeting or call with a City Hall transport representative to discuss their views on car sharing and how our value proposition can best address priorities and concerns.

Kind regards

Martin

MARTIN ORME | Director & Co-founder

Response by Hackney Living Streets [redacted]

Investigation into traffic congestion in London

London Assembly Transport Committee 2 September 2016

Summary

Hackney Living Streets

We are a local voluntary group representing the majority of people in Hackney who do not use a car and travel on foot or public transport.

Hackney suffers from congestion and its related problems of pollution and ill-health. It has higher than average rates of inactivity related obesity levels, and high pollution levels particularly around schools. This is even though it has one of the lowest levels of car ownership in London at under 35% of households and high general walking rates of 42%. The majority of people in Hackney walk, cycle or use public transport to move around.

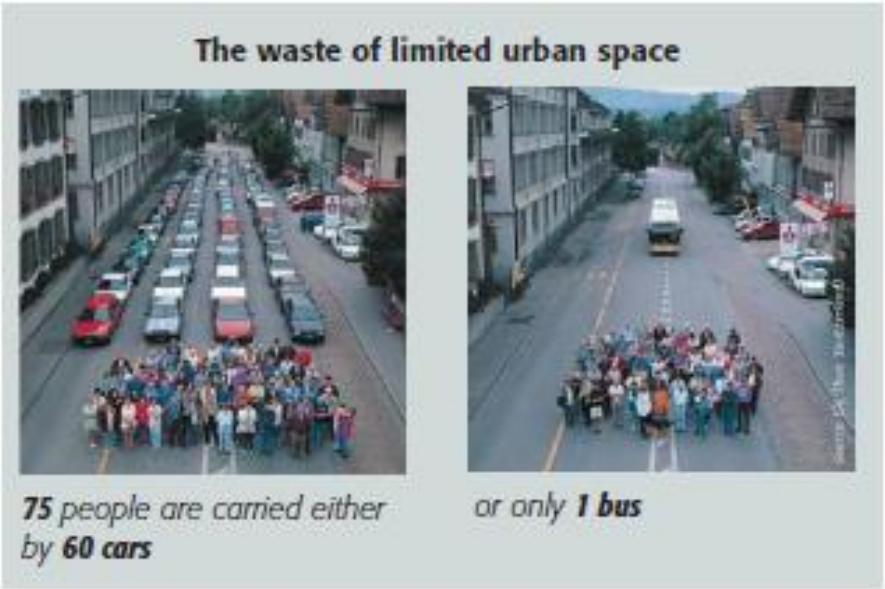
A significant contributor to congestion in Hackney is the high levels of through motor traffic coming off and on the A12 motorway. Availability of free parking, available rat runs (cut throughs in residential streets) and low costs of motoring are major attractors.

The presence of congestion discourages walking and cycling, makes bus journeys slower and exacerbates pollution. It also delays essential journeys by emergency services and other services that can only be delivered by motor vehicles.

A range of problems can therefore be solved by addressing congestion.

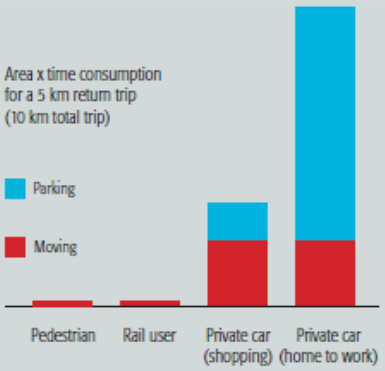
We urge the GLA to take bold action to reduce congestion by

- instituting an extended usage and emissions based road pricing scheme,
- instituting an extensive programme to reduce rat running on residential streets and near schools
- instituting a Workplace Parking Levy and allowing Councils to charge appropriate market rates for parking
- encouraging more efficient modes of transport such as walking, cycling and public transport by allocating more space for these modes on our streets.



Every mode of transport uses space for moving and parking over a period of time. Moving and parking can be aggregated into one unit of measurement: space x time expressed in m² x hour.

The most demanding mode of transport in terms of space is the private car. For example, a journey home or to work by car consumes 90 times more space than if the same journey was taken by bus or tram.



Source: Sti, Thun, Switzerland

Responses to Key questions

General questions

1. **How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?**

   TfL's annual Travel in London Reports provide comprehensive information on this issue.

   Car ownership in London has gone down over the last 15 years, from 44% to 39% households with a car in inner London and more marginally in outer London from 70% to 68%. Modal share for private cars has also been dropping and is now 36%, but still very high compared to walking (24%), cycling (2%) and public transport at 31%.(*TfL Travel in London Report 8 for 2014*).

   However, over the last few years vehicle kms have risen with the biggest increase in central London up by 3.4%. In outer London motor traffic has risen consistently over the last three years.

   Motor traffic speeds are low with average speeds of 12-13kms/hour in central London, of 16-20kms/ hour in inner London and 28-34kms/hr in outer London.

   This is far slower than the average speed of cyclists in London. There is significant scope for reducing congestion by getting people out of cars into public transport, walking and cycling.

2. **What are the key causes of these changes in congestion?**

   - **Driving not adequately or accurately priced**

   A critical reason for high driving levels and especially rising levels of driving in recent years is that driving is not priced adequately to reflect the costs imposed on others, and therefore is a more attractive option compared to expensive public transport costs.

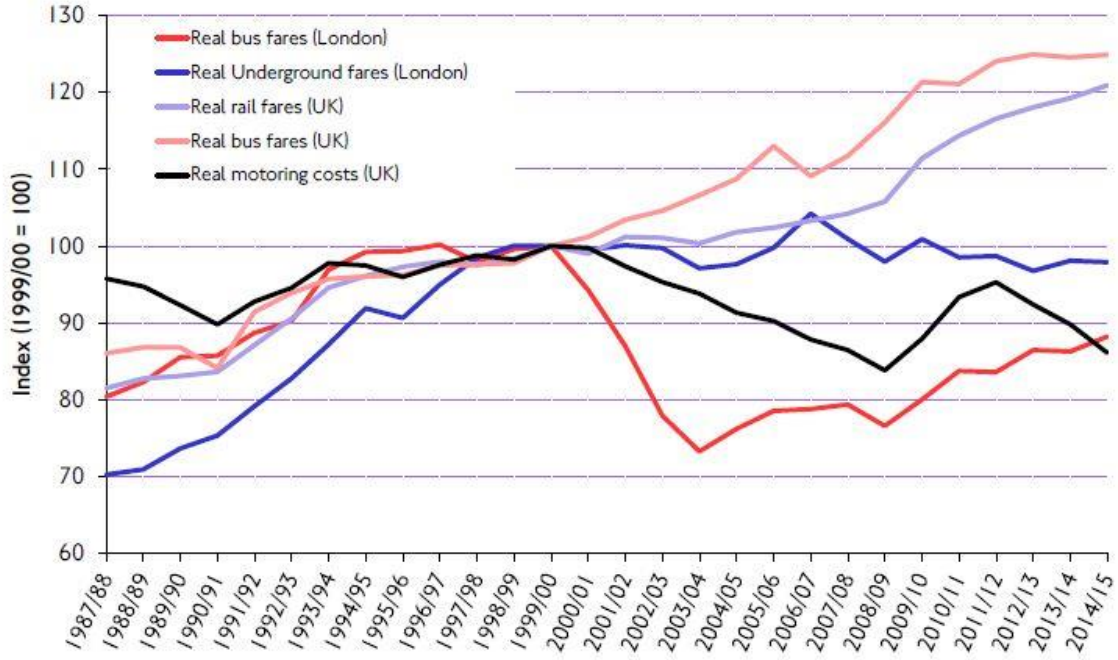
   The costs of using valuable space for parking and driving, congestion, pollution, noise, danger, collisions are not borne by individual car drivers but by other road users, society and tax payers as a whole. This has been well documented in studies commissioned by the IPPR , UK government and the European Commission. (Studies are attached)

   - *The Future of Urban Transport*, Dept for Transport, 2010 (with foreword by Minister Sadiq Khan)
   - *The War on Motoring Myth or Realty*, Lisa Hopkinson, IPPR, August 2012

- *The True Costs of Automobility: External Costs of Cars.* Institute of Transport Planning and Road Traffic, University of Dresden, 2014

While public transport fares have risen in London motoring costs have come down and parking costs have remained static. Also lower car ownership has created more space on the roads for those who wish to drive as there is no marginal cost for driving the additional mile once the capital investment in car purchase and insurance has been made.

Figure 5.2 Public transport fare trends – London and UK compared.



Source: TfL Customer Experience.

- **Removal of western extension congestion charge area**

While the presence of the congestion charge considerably reduced the volume of motor traffic in in the congestion charging zone, conversely the removal of the Western Extension zone has led to increased congestion in this area.

Congestion peaks on the periphery roads around the congestion zone as these have no charge attached to driving on them but are attractive connector routes.

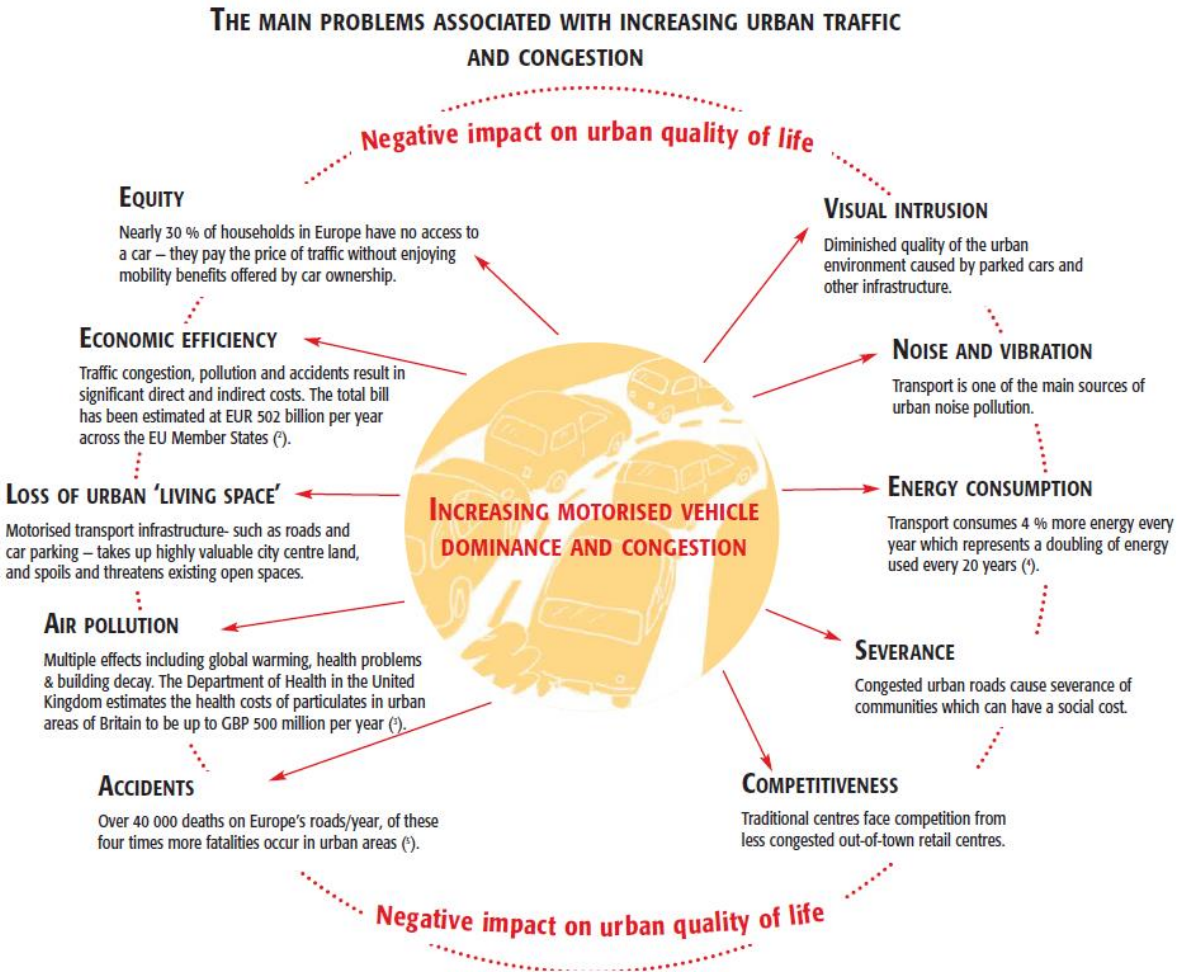
Other causes of congestion include:

- People do not want to cycle or walk, or allow children to walk or cycle, because of road danger, noise, pollution and generally unpleasant street environment. People therefore drive themselves and children rather than walking or cycling.
- Taxis providing an attractive alternative to paying high public transport fares (taking advantage of free parking and no congestion charging)
- Parking charges have not gone up. There is free parking all over London after 6:00pm which particularly encourages retaining car ownership and driving after this time.
- Lack of a Workplace Parking Levy means there are fewer barriers to driving to work. Many employers, in particular public sector employers, such as schools in most of London, provide free parking for teachers and staff.

3. What impact does congestion have on Londoners, the city's economy and its environment?

There are considerable negative impacts of congestion on London's people, its economy and its environment. These impacts include:

- Difficult movement for cyclists and pedestrians trying to negotiate crowded streets with impatient, stressed and angry drivers.
- Political pressure to provide more space for cars and free parking
- Much more rat running in residential streets
- Pollution and deteriorating air quality



Widespread concern about air pollution

Though the UK signed up to international air quality standards in 1995, as part of the Environment Act, pollution in London has been increasing with 9,400 lives being lost annually attributable to pollution.

Concern over pollution is at an extremely high level in the UK and particularly in London. UK internet searches relating to air pollution have increased up to 750% in the last ten years according to Nissan, producer of the zero emission electric vehicle, the Nissan LEAF.

The popularity of search terms "best air purifier" and "air quality index" both rose by a factor of 750% from August 2006 to August 2016 whilst the phrase "air pollution facts" climbed 350% over the same period. The interest for "best air purifier" saw a 10-year spike in June 2016.

The data demonstrates a rising sense of health consciousness amongst residents of Europe's capital cities when it comes to air quality, with consumers increasingly seeking their own solutions to help 'clean up' the air around them.

A recent study highlighted in the media https://www.theguardian.com/environment/2016/aug/30/uk-air-quality-shows-little-improvement-past-20-years-says-study?CMP=share_btn_tw shows there has been little improvement in air quality over the past 20 years as transport planners focus on economic growth. Dr Tim Chatterton and Prof Graham Parkhurst, from the Bristol-based University of the West of England, said their work concluded that UK transport planners were not taking the environmental impacts of transport choices sufficiently into account. "Air pollution is perhaps the grossest manifestation of a general failure of UK transport planning to take the environmental impacts of transport choices sufficiently into account," said Prof Parkhurst. The academics also claimed

- there were limited regulatory and financial support for alternative transport and for local authorities seeking to introduce air improvement measures such as low emissions zones.
- there was a strong social equity issue, with households in poorer areas more exposed to much higher levels of air pollution, while contributing much less to the problem, mainly through driving less
- Politicians must treat poor air quality as a public health priority, placing clear emphasis on the severity of the problem and the limitations of technological fixes. Existing approaches that focus on individual, voluntary, behaviour change and technological innovations are not sufficient to tackle poor air quality.

4. What can London learn from other cities in its effort to reduce congestion?

Many cities are strongly discouraging private car use or banning cars in increasing larger areas of the city or on particular days of the year.

Paris has regular car-free days, converting the banks of the Seine into a beach in the summer, it is also planning to semi-pedestrianise seven of its most famous squares by 2020; Copenhagen has reallocated much of its central road space for walking and cycling; many other European countries have done the same; Oslo plans to go car free in its centre by 2019; Madrid has banned cars from the city's four central districts; Hamburg, Helsinki and Madrid are planning to go car free in the future in the central areas.

The Netherlands has been encouraging walking and cycling since the 1970s and restricts motor traffic to ring roads while filtering inner residential zones for access only. It has an extensive network of cycle lanes and has pedestrianised many parts of the city centre.

None of these initiatives has harmed the economy, health, quality of life or popularity of the government.

'Instead of wide, noisy streets in and out of the city and six storey underground parking all over the city centre, Copenhagen has opted for fewer cars and an extremely attractive city centre. Copenhagen is living proof that it works'. *(Jan Gehl and Lars Gemzøe 1996).*

COPENHAGEN– A CITY WITH A VISION

Until 1962, all streets in the medieval city centre were filled with cars and all the squares were used as car parks. As car traffic increased, conditions for pedestrians were rapidly deteriorating.

On 17 November 1962, Copenhagen's main street, Strøget was pedestrianised. This conversion was hotly debated at the time. People argued that a pedestrian street in Denmark would never work. However although scepticism was high, the new car free environment proved extremely popular with local residents from the first day.

This marked the beginning of a gradual transformation that has continued ever since. Today Copenhagen has a vibrant city centre that attracts visitors throughout the year.

Today the city of Copenhagen has over 96 000 m² (of which 33 % is street and 67 % city squares) of car-free space.

While pedestrian traffic levels have remained largely unchanged over past decades, activities connected with stopping and staying are almost four times greater than in 1968. During the summer months many of the pedestrian streets are full to capacity with people enjoying the many outdoor social and cultural activities. In the winter months attractions include festivals, and outdoor ice skating.

Congestion charging around the world

Many cities around the world other than London have congestion charging including Singapore, San Diego, Stockholm, Milan and Oslo

Riga, Durham, Znojmo, Valletta, Miami and San Francisco all some form of road use pricing or variable parking fees to reduce congestion.

http://thisbigcity.net/five-cities-with-congestion-pricing/

https://www.theguardian.com/world/2011/dec/08/congestion-charges-around-the-world

Charging for road usage

5. **How effective is the Congestion Charge? How should this scheme be modified?**
   - It needs to be extended and be usage based with a higher rate in central London reducing as you move away from town centres.
   - London Congestion Charge has generated £1.5bn funding for public transport since its introduction in 2003

6. **To what extent would a usage-based road pricing regime help reduce congestion?**
   - This is exactly what is needed to discourage unlimited driving which a one-off payment allows. Currently taxis pay once but are allowed to travel all day in the congestion charging zone – the same price as someone passing through one part of London. What incentive is there to restrict travelling in London by car by a one-off daily charge?

7. **How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?**
   - This will definitely help, but non-polluting cars still cause congestion. Causing pollution is not necessarily a proxy for causing congestion. Electric cars cause just as must congestion as the most polluting diesel cars. Both emissions and road usage must be taken into account in a charging system. Larger vans and estate cars should pay more than smaller vehicles.

8. **What would be the benefits and drawbacks of these other interventions?**

- Tolling for river crossings or other major infrastructure

This would be useful in restricting opportunistic and unnecessary motor traffic into London, and assist to pay for any infrastructure.

- Workplace Parking Levy

Currently many people who drive to work do so because they get free parking. However, there is a huge impact of their driving to work -it causes pollution, congestion, danger to other road users, affects the health of the driver (reducing active travel) and of other Londoners (making them too fearful to cycle or walk). The levy would address the external health, environmental and social costs of driving.

Workplace parking levies and other innovative financial mechanisms could raise millions for public transport. The Campaign for Better Transport is urging the government to consider broadening the

ways in which public transport is financed in the UK, and believes it could learn from innovative schemes like Nottingham's workplace parking levy (WPL).

Nottingham's WPL now raises £9m a year which is used to finance the city's public transport, including new tram lines, electric buses and the regeneration of the railway station.

Cities such as Oxford and Cambridge are now actively considering implementing their own WPL schemes.

- Devolving Vehicle Excise Duty to London

It would make sense to localise vehicle excise duty as Londoners currently have to pay the external costs of the minority of drivers and would benefit from the charges paid by drivers to compensate for (a portion of) the damage they cause. This funding should be allocated to improving public transport and making it more affordable.

Measures to target specific types of vehicle

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

There needs to be carrot and stick.

- Delivery vehicles are travelling around all day and therefore a usage based congestion charge would be much more likely to affect them and to encourage them to be more efficient. This is the stick.
- The carrot would need to be to provide financial and other incentives for local shops, post offices to serve as collection centres and store items so that people only need to travel less than a mile to collect smaller items. For larger items, the delivery congestion charge would need to be paid.
- Financial incentives including grants and tax exemptions should also be provided to deliveries by smaller non-motorised methods such as cargo-cycling that can deliver larger items.
- Consolidations centres for freight need to be incentivised. Congestion charging for large freight vehicles need to reflect the additional burden caused by larger vehicles on road surfaces and their increased danger to other road users and the additional congestion they cause on narrow streets.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

- Congestion charge for mini-cabs as with other taxis should be usage based and not a daily charge
- No taxis should be allowed to use bus lanes, as they cause congestion and are often occupied by one person. The subsidy and ease of movement given to mini-cabs by allowing low congestion charge and use of bus lanes means these become much more affordable to bus users who use them in preference to public transport, and a vicious circle results where cabs further slow down buses and become more attractive as an alternative.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

- These are a good measure to reduce the number of cars overall and should be encouraged. Parking for these should be prioritised.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

- It is possible that in certain locations such as Oxford Street, bus services could be rationalised. However, in most cases, buses should be prioritised over private car use and should be actively promoted as a substitute for private car use.
- Currently there is so much car parking allowed on bus routes that there is extensive congestion caused just by bus drivers trying to manoeuvre around legally parked cars, building up huge queues behind them. A review of parking spaces on bus routes and the prioritisation of bus routes over on-street residential car parking would relieve an immense proportion of congestion.

Encouraging modal shift

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

This has to be carrot and stick.

- Walking, cycling and public transport use could be encouraged by
    - Providing more dedicated space on roads (taking this from parking and motor traffic)
    - A 20mph default speed limit for London
    - Providing more safety on the roads by traffic calming and better traffic enforcement. Ask police to focus on mobile phone use, driver distraction, red light jumping, not keeping pedestrian crossings clear when queuing.
    - 25% of collisions in London are caused by drivers without licences or insurance. Getting these drivers off the road would improve safety.
    - Removing through motor traffic where possible by filtering roads and keeping traffic on main roads
    - Making roads better for walking by removing parking and providing pedestrian and cycling amenities such as more greenery, trees and flowers, seating and resting places, play areas for children, cycle parking, art work etc. Allow and encourage local people to choose to use parking spaces for community uses rather than just for private car storage.
    - Increase parking charges and make them apply for 24 hours, 7 days a week.
    - Focusing on schools and not allowing motor traffic past schools during arriving and leaving times as in some Scottish schools
    - Incentivising children to walk and cycle. Do not educate children to think they deserve to die and be injured if they make a mistake, but educate them about rights and how drivers should be paying much more attention.
    - Providing subsidies for cargo bikes for families and deliveries similar to those provided for electric cars.

Providing new road infrastructure

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

The likelihood of increasing road capacity causing additional 'induced traffic' has been well documented in studies dating from the 1990s. See attached:

- paper by S. Cairns, Hass-Klau and Phil Goodwin, *Traffic Impact of Highway Capacity Reductions: Assessment of the Evidence*, Study commissioned by London Transport and Dept of Environment in 1998
- Study by European Commission *Reclaiming city streets for people, Chaos or quality of life?*

CHALLENGING ASSUMPTIONS: THE CONCEPT OF TRAFFIC EVAPORATION

There is a growing body of evidence that where well-planned measures to reduce road space for private cars are implemented in congested areas and where no alternative network capacity is available, over the long term the predicted traffic chaos does not occur. This evidence is most notably presented in an important report (2) commissioned by the UK Department for Environment, Transport and the Regions (3) and London Transport (4).

'Traffic Impact of highway capacity reductions – assessment of the evidence (1998)' S. Cairns, C. Hass-Klau and P. B. Goodwin

Data taken from nearly 100 locations showed traffic chaos to be limited to a 'settling-in period'.

- **Wide range of results, with a 25 % average overall reduction in traffic and a 14 % median reduction in traffic (i.e.'traffic evaporation'). A proportion of traffic which had previously used the affected road(s) could not be found in neighbouring streets.**

Traffic evaporation is likely to occur where road space has been reduced for private cars and where, due to general traffic levels or the design and area covered, drivers cannot find:

- an alternative route, or
- an alternative time of day to travel,

without experiencing severe congestion (recognising that driver behaviour will also be affected by additional factors such as the availability of alternatives including avoiding the need to travel or making use of public transport).

Contrary to widespread assumptions car drivers adapt to changes in road conditions in highly complex ways which computer models cannot accurately predict.

Short term

- initial cramming of roads was followed by searching for alternative routes and times to travel.

Medium term

- More varied and flexible trip-planning;
- changing mode of transport;
- reviewing the need to travel;
- trip combining.

Longer term

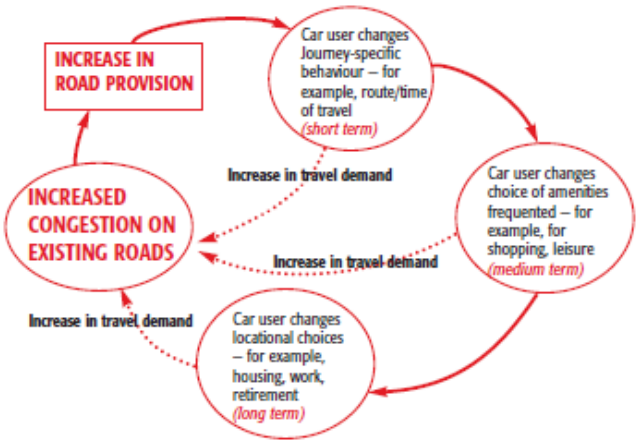
- switching locations of activities or even home or workplace.

Individually or in combination these diverse driver responses to congestion can result in a proportion of traffic 'evaporating'

(2) Cairns S, Hass-Klau C, Goodwin P B (1998) 'Traffic impact of highway capacity reductions: assessment of the evidence': London, Landor Publishing.
(3) Now the Department for Transport, Local Government and the Regions.
(4) Now Transport for London.

The traffic induction cycle

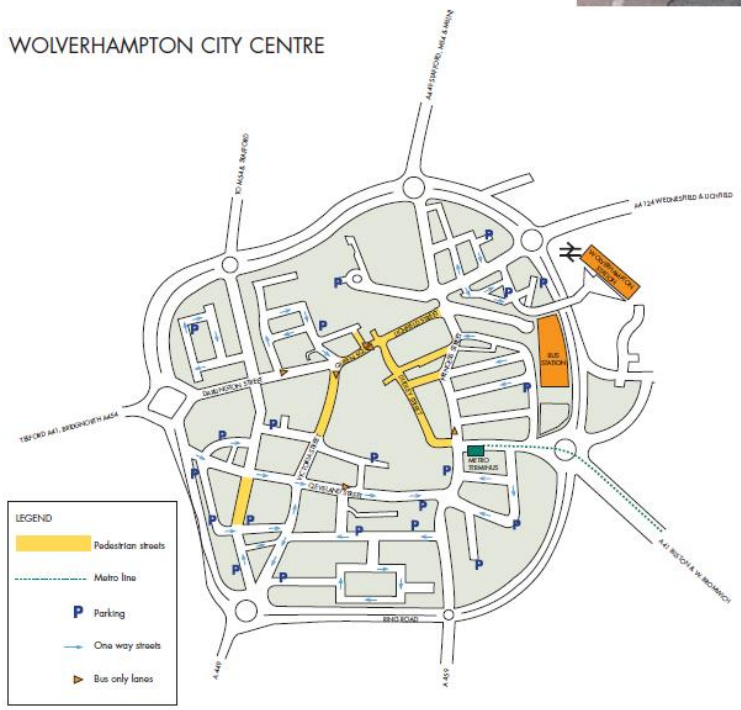
- In the short and medium term, some people will simply use the time savings afforded by the new road to drive further – for example, to a shopping centre.
- In the longer term the road will influence people's locational decisions particularly with respect to where they choose to live in relation to their work.
- The evidence again suggests that some people will simply choose to travel further in the same time rather than 'accept' the time-saving on offer.



The capacity of individual car users to change their travel behaviour in a range of creative ways, when faced with the problem of severe traffic congestion, presents real opportunities for urban planners who seek to optimise the use of space and quality of life in the city.

26 *Case study – 'Opportunities for regeneration'*

Queen's Square:
before (left) and after (right) renovation



Results

Traffic flows

With each phase, after an initial 'adjustment' period, drivers soon became used to the new road layout and any initial congestion was short-lived.

After Phase 4 in which all through traffic was removed from the city centre, the data suggests that the traffic absent from the inner ring road cordon (which had fallen by 14 % between 1990 before the closure and 1996) appears not to have transferred to the outer ring road, where the cordon count went down by just over 1 %. Some of the traffic appears to have 'evaporated'.

Effects of road closure on traffic flows

24-hour, two-way traffic flows	November 1990 before Phase 4	November 1996 after Phase 4	Total change
Cordon on approach roads outside ring road	222 900	220 300	-2 600 (-1.17 %)
Cordon on roads within the ring road	81 500	69 750	-11 750 (-14.42 %)

Source: Wolverhampton City Council.

16. **How should new road infrastructure be funded?**

    Any new infrastructure should return an economic benefit from the use of the space, whether this is by increased pedestrian footfall and cycling leading to regeneration of an inner city centre, or increase in active travel leading to lower health costs, or adequate compensation for use of space by private drivers.

Maximising available road space

17. **How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?**

    It should be noted that roadworks that close off roads to motor traffic open them up to walking and cycling and are extremely popular. This increases footfall and does not harm businesses (other than the requirement for servicing which could be temporarily by trolley or non-motorised modes.

18. **What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?**

    Cycling infrastructure has only recently been installed and its impact on congestion is too early to quantify. In the short term lack of road space for driving will take drivers by surprise, but inevitably they will modify their choices to ensure they make effective use of time vs cost of travel. Driving may be cheap (as road space is so inadequately priced) but the additional time factor will put off people from driving and they are likely to switch to other modes to maximise their economic benefits.

heat

Hager Environmental & Atmospheric Technologies

London Assembly

Investigation Into Traffic Congestion in London

Hager Environmental & Atmospheric Technologies
H.E.A.T.

August 10, 2016

Ms. Caroline Pidgeon
London Assembly Transport Committee Chair
London Assembly
City Hall
The Queen's Walk
London, SE1 2AA

Subject: **Response to London Assembly's Investigation into Traffic Congestion in London**

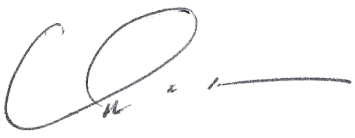
Dear Ms. Pidgeon,

Hager Environmental & Atmospheric Technologies (HEAT) is eager to submit this proposal for review in response to the London Assembly's Investigation into Traffic Congestion in London.

This proposal is intended to answer questions provided by the London Assembly's Transport Committee in order to examine what can be done to aid in the reduction of congestion and pollution to improve the lives of Londoners. In addition, HEAT would be honored at the opportunity to provide a solution to the Mayor of London and Transport for London with our groundbreaking Emissions Detection and Reporting (EDAR) system which has been developed and utilized to accurately detect and quantify vehicle emissions on road while in their natural operating environment. This innovative and advanced technology, EDAR, has been successfully commercially deployed and validated both in the United Kingdom and the United States.

We look forward to bringing the Mayor, Transport for London, and the London Assembly a solution for tackling congestion and air pollution, which cause damaging problems for the health of London. We are available to answer any questions or provide any additional information.

Sincerely,



Yolla Hager
President

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London Assembly Investigation into Traffic Congestion in London Proposal:

1. **How has traffic congestion changed in London in the recent years? Are there differences in the amount, time, type and/or location of congestion?**

Answer: London continues to be one of the most congested cities in the world. Congestion in London has risen noticeably between the years of 2012 and 2015 with journey times in Central London increasing by 12% annually according to an INRIX report entitled London Congestion Trends published in March 2016. Travel time for an average daytime 5-mile trip is up 22% since 2012. http://londonfirst.co.uk/wp-content/uploads/2016/05/London-Congestion-Trends-FINAL.pdf

2. **What are the key causes of these changes in congestion?**

Answer: According to the INRIX report Roadworks have increased by 362% since 2012 and these projects are the leading contributors to congestion. While traffic volume in most vehicle categories has been flat, there is a noticeable increase in delivery and service vans. This increase is largely attributed to the increase in e-commerce. Unfortunately, the vast majority of these delivery vehicles are diesel powered.

3. **What impact does congestion have on Londoners, the city's economy and environment?**

Answer: Congestion makes people late to work and stresses them out before they even get there. Deliveries cannot arrive on time and massive quantities of petrol are consumed idling in turn contributing to air pollution. There are obvious economic consequences from traffic congestion in London. However, the environmental consequences may be even more severe. Due to the high number of diesel vehicles in London, the levels of NO2 and particulate matter have reached critical levels. Air Quality standards from the World Health Organization (WHO) and the European Union (EU) have been violated in London and legal action has been taken in an attempt to correct this situation. The situation is so severe that the air pollution limits for the year in London were exceeded within the first week of 2016.

4. What can London learn from other cities in its effort to reduce congestion?

Answer: The consensus seems to be that Congestion Zone Pricing can be successful, provided there are reasonable alternative means of transportation. Congestion Zone Pricing that offers exemptions for "clean cars" has proven successful in simulating the sales of low polluting vehicles. In Stockholm, Sweden the sales of "clean vehicles" is up 27%. http://www.tmleuven.be/expertise/seminar/20111205_Stockholm.pdf

In Gothenburg, Sweden the congestion zone was effective in reducing traffic. It is down some 12% during the charging hours, with many commuters switching to public transportation. http://www.citylab.com/commute/2015/04/swedens-other-congestion-pricing-program-is-also-a-big-success/390933/

5. How effective is the congestion charge? How should the scheme be modified?

Answer: The congestion charge can be effective at raising revenues, which can be used for public transportation, bike lanes, and other schemes. However, in terms of environmental improvement, the London Congestion Zone should be combined with the London Low Emissions Zone. The new combined system should have a mechanism that will measure real world emissions from vehicles as they use the zone. The failure of the EU vehicle emissions certification system has resulted in on road emissions that are significantly higher than the laboratory test results. Therefore a pricing scheme based on EU standards will not result in expected emissions reductions, especially in terms of NO_2 and $PM_{2.5}$ emissions from diesel vehicles. Emissions Cameras such as the Emissions Detection and Reporting (EDAR) system must be employed to measure the on-road emissions from vehicles using the zone. The use of the emissions camera may also promote a reduction of diesel vehicles in the fleet due to motorists being able to see their individual emissions contribution.

6. **To what extent would a usage-based road pricing regime help reduce congestion?**

Answer: A usage based-based pricing scheme which measures real world emissions would accomplish two things. First, it would positively encourage a change in driver behavior if the public becomes aware that their emissions are being measured daily. In addition, the fee charged to enter a congestion zone will also help discourage motorist from driving into highly congested areas. An Emissions Camera like the Emissions Detection and Reporting (EDAR) system can accurately identify polluting vehicles on road. This can give decision makers the opportunity to monitor and put in place policy, which can regulate motorist from driving into a low emission zone. This will greatly assist in emission reduction and congestion relief.

7. **How can the Mayor and TFL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?**

Answer: The number of delivery vans can be reduced by two methods. First, a sliding fee can be used to raise the charge during the highest congestion times. The increased cost will likely convince delivery vehicle operators to seek alternative times to make deliveries. Second, a fee can be based on the actual levels of pollution the delivery vehicles produce on their journey through the congestion/low emission zone. This would likely result in delivery van operators purchasing less polluting vehicles or altering their diving behaviors, which would help reduce pollution.

8. **To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed**?

Answer: An increase in minicabs is likely a good thing, as long as they are environmentally clean cabs, because it provides an alternative to driving a car in the city. However, recent news articles have shown that a significant number of diesel vehicles have had their particulate filter traps removed or disabled. An Emissions Detection and Reporting (EDAR) system can identify those vehicles and allow authorities to put a corrective action scheme in place such that they fix the problem and restore their vehicle's emissions control devices to a condition where they perform their designed function. This is an ideal way to allow Mayor Khan can follow through on his commitment to make London's taxi fleet "the cleanest in the world". http://www.standard.co.uk/news/london/mayor-orders-major-crackdown-on-rogue-minicabs-in-london-a3309771.html

9. **How can TFL further encourage a shift from private car to public transport or active travel modes?**

Answer: Through the use of an EDAR system, TFL will be able to monitor and identify the most polluting vehicles. This will allow policy makers to put a system in place that will allow the vehicle owner to know how much environmental damage they are causing. This will encourage some vehicle owners to seek alternative modes of transportation such as public transport or biking.

10. **To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?**

Answer: New roads could encourage more people to drive. However, by using the EDAR system you will have a tool, which can show drivers that the authorities are monitoring the roads. This will discourage people from driving private vehicles and encourage the use public transportation. It will also convince people to drive in a more sensible, environment friendly manner.

11. How should new road infrastructure be funded?

Answer: The EDAR system can be used as a fee collector for the congestion/low emission zone. These fees could be used to fund the new road infrastructure, or any number of other projects. Additionally, if the authorities choose to fine vehicles for emitting high levels of pollution, this money collected could also be used to fund the new improved infrastructure.

12. How can the use of technology be enhanced to help TFL manage congestion? For instance, how can the iBus system be used for this purpose?

Answer: The high-tech EDAR unit can work in tandem with the iBus system to help keep track of the bus fleet as well as monitoring emissions contributions in real time so that if an issue arises it could be remedied immediately.

Hailo response to London Assembly Investigation into traffic congestion in London

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

As the committee's consultation paper recognises, London's roads have become increasingly congested over recent years. This congestion has caused a significant reduction in average speeds on London's roads, and an increase in the amount of time London's drivers spend idling in traffic.

In March 2016, Hailo released new data which showed that traffic on London's roads is increasingly slowing down. The data, collected from millions of journeys across the capital, shows the average monthly speed dropped 8% to 12.9kph for 2015, suggesting that the burden on London's roads and its users is unsustainable in the long-term. Zone 1 average speeds were 1.5kph (5%) slower than the capital as a whole in 2015.

The challenge facing London's road network is further emphasised by the widening gap between weekday and weekend traffic, both of which are slower in 2015. Last year, weekday travel was 12.3% slower than weekend travel. In 2014, the gap was 10.7%. The downward trend in average speed, combined with the widening gap between time taken for weekday and weekend travel, suggests that road travel in London will become increasingly inefficient.

2. What are the key causes of these changes in congestion?

There are a number of possible factors contributing to these trends, including the 12% increase of delivery vehicles in the last decade, and an estimated 7,300 vans and lorries entering the capital daily during the morning rush-hour last year alone. Additionally, the number of private hire vehicles (PHV) in London reached 93,000 in December 2015 according to then Mayor of London Boris Johnson, who subsequently called for a review of the Congestion Charge Exemption granted to PHVs. Other related issues, such as roadworks, are believed to be a contributing factor to heavy delays which currently account for motorists wasting 13 days of their lives each year stuck in traffic jams - a figure that, were the problem to be left unchallenged, could rocket to as many as 40 days per year by 2030.

3. What impact does congestion have on Londoners, the city's economy and its environment?

As reported by many sources, congestion on London's roads is reaching record levels and risks of further traffic flow problems could increase pollution levels, and damage Londoners' quality of life and the Capital's economy if left unchecked. A 2014 study carried out by INRIX in conjunction with the Centre for Economics and Business Research found that by 2030, the annual cost of congestion will rise to over £9bn. With the dramatic rise in congestions seen between 2013-2015, this may well be an underestimate.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

One of the main reasons for the increase in congestion in recent years has been the proliferation of PHVs. The process for registering as a PHV driver is easy compared to that for becoming a Black Cab driver.

Black Cab drivers study extensively to pass the Knowledge, and face far higher up-front costs. In contrast, PHV drivers face far lower barriers to entry. The increase in the number of app-based minicab services, coupled with low entry costs and a lack of regulation, is a substantial part of the reason that PHVs are becoming an increasingly common sight on London's roads - and contributing to congestion in the capital.

The role that the Knowledge plays in allowing Black Cabs to reduce and avoid congestion in the capital should not be underplayed. Black Cab drivers, having studied for the Knowledge and having access to bus lanes, are far more adept than PHV drivers at avoiding congestion spots and making the best use of the available road capacity in London. This means that other road users are not inconvenienced by the presence of Black Cabs, and the Knowledge allows drivers to be more capable even than sat-navs at avoiding congestion.

As a sign of support for the Black Cab trade, we welcome the Mayor of London's £65m fund to assist Black Cab drivers in the transition to green vehicles, which will help to tackle environmental issues in the city.

We believe the role that Black Cab drivers play in reducing and avoiding congestion is an important one, and one that TfL should welcome and encourage. We value the two-tier system that currently operates in London, and we believe that TfL should re-state its commitment to maintaining this standard.

While TfL's recent proposals for English language tests and other regulatory changes will contribute to slowing the increase in the number of new PHV drivers, these changes alone are unlikely to substantially contribute to tackling congestion levels. Further regulation ought to be implemented to limit the number of new PHV licences issued annually, in order to curb the ongoing rate of growth of these vehicles on the capital's roads.

In addition, Black Cabs face a much higher entry cost of around £1,250 compared to the PHV sector, which has comparatively low entry costs of around £370. These costs do not include the cost of vehicles and the time spent studying for the Knowledge which further favours PHVs over Black Cabs. Black Cabs are mandated by TfL to include a tighter turning circle, full accessibility, and separation between driver and passenger – this is what the Balck Cab of today delivers. In contrast, a PHV driver simply drives a production line car that has no specific design features. TfL ought to look at ways to reduce this cost differential in order to slow the increase in the number of PHVs, and to encourage the growth in Black Cabs drivers instead.

Conclusion

We hope these observations are useful and would be happy to expand on them at some stage in the future.

Hailo

September 2016

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Wandsworth
London
SW18 1SL
www.hub-box.com

London Assembly
c/o Georgina Wells
City Hall
The Queen's Walk
London
SE1 2AA

Investigation into traffic congestion in London – submission

Re: question 9: How can The Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

One factor that contributes greatly to the number of delivery vehicles in London is the prevalence of London workers who live outside the city, and who have online shopping orders delivered to their place of work because they will not be at home to collect the delivery.

One option to reduce these extra vehicles is to incentivise companies and employees to use a Click & Collect pickup solution to collect their deliveries near home (outside London) instead of having deliveries sent to work.

We at HubBox offer a nationwide Click & Collect service that means customers can shop online and have their parcels delivered near home to a trusted local shop, collecting them at their convenience.

HubBox is interested in helping to keep London's air clean and streets less congested. We've recently been mentioned in Cross River's Clean Air Better Business graphic (see below) about lessening pollution by reducing delivery vehicles.

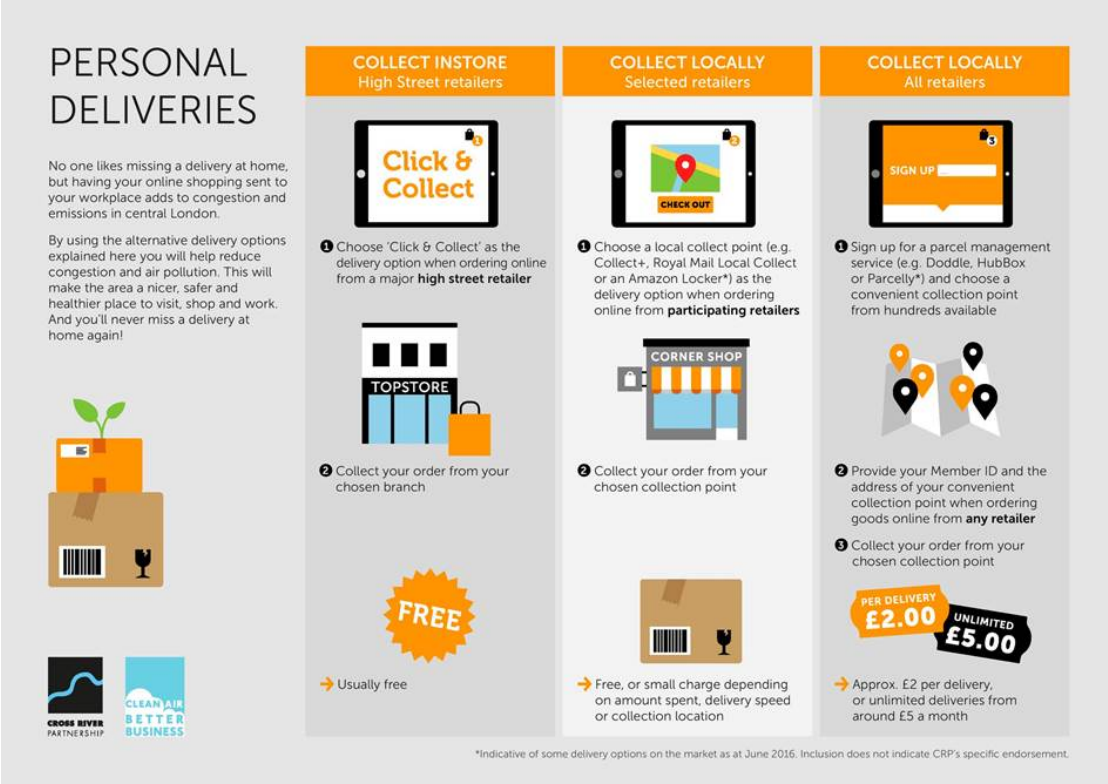
Working with the Transport Committee, we would be delighted to offer exclusive discounts and group packages for corporations to offer their employees the HubBox service if they live, for example, in zones 2-9 (or outside London entirely), or wherever the Committee determines would have the most benefit.

Please contact one of our co-founders with any questions or to further discuss this submission:

Sam Jarvis (CEO): [redacted]
Greg Beszant (COO): [redacted]

Many thanks in anticipation for your consideration.

Kind regards,
Catherine Hirst
Head of Operations, HubBox
www.hub-box.com



Comments for the London Assembly Transport Committee's Investigation into Traffic Congestion in London from the Institute of Tourist Guiding, the Association of Professional Tourist Guides and the British Guild of Tourist Guides

Executive Summary:

This submission is from the combined bodies of professional Tourist Guides

- There was an unprecedented response from Guides, who spend a great deal of their working lives in London traffic
- Congestion on London roads was felt to have deteriorated markedly over past 2 years
- The main causes identified were:
    - Dedicated cycling routes causing permanent traffic bottlenecks in some key locations
    - Huge number of uncoordinated construction projects, especially on key tourist routes, causing cumulative logjam effect
    - Huge increase in number of vehicles using the roads (especially delivery vans & minicabs). Vast majority of these are exempt from the Congestion Charge
- The impact of increased congestion is:
    - Deterioration in air quality
    - Worsening reputation for London as a tourist destination (leading indicators and warning signs are now flashing red)
- Tourist Guides, as part of UK's 5th largest industry & 3rd largest export earner, would like to:
    - Work with the GLA to highlight a few routes critical for London's Tourist industry
    - Be involved in plans for future changes to London's roads including plans for Oxford St (pedestrianisation) & Greenwich Cruise Terminal
    - Invite GLA members to experience a tour to see what conditions are actually like

Who we are:

This submission comes from the Institute of Tourist Guiding, the Association of Professional Tourist Guides and the British Guild of Tourist Guides. These three organisations represent the Blue Badge Guides, the only fully qualified guides in London. Between the three organisations we represent around 800 professional guides currently working in London, guiding inbound visitors from a wide variety of countries. Our work with visitors represents in excess of 1m visitor interactions each year. One strand of the work of a London Blue Badge tourist guide is coach panoramic tours of the major tourist sites in London.

The Institute of Tourist Guiding was created due to the disbanding of the London Tourist Board (a predecessor of London and Partners part funded by the Mayor's Office). Today it is the accreditation body for qualified Tourist Guides across England, setting professional standards in tourist guiding, marking exams and awarding the Blue Badge. The Association of Professional Tourist Guides and the British Guild of Tourist Guides are membership bodies who support Blue Badge Guides. They provide practical support for guides at work, continuing professional training, public liability insurance, networking opportunities, and formal liaison with sites where we guide including key London sites such as the Tower of London and Westminster Abbey, where Blue Badge guides are the only external guides officially permitted by Management. The Guild represents qualified guides from across Britain including London while APTG only represents those in London. Despite being separate organisations we work closely together particularly when representing qualified guides in the wider tourism sector.

In advance of this submission we asked members to send comments and share experiences of congestion while guiding. The strength of views on this matter may be gauged by the fact that, although the consultation is taking place at the busiest time of year for guides the response was the largest we have had to any tourism-related consultation to date. It is clear from the level of responses and comments that traffic congestion is a major issue for tourists and guides. We therefore welcome this opportunity to contribute to the debate.

Why traffic congestion is an issue for tourist guides?

Tourism is a vital part of the London economy and as guides we spend much of our time delivering tours in coaches, private hire vehicles and on public buses on London's roads, both in the central area and farther afield. Blue Badge guides are self-employed sole traders - effectively small businesses working with partners (travel agents, coach operators etc) - and are reliant on being able to move our clients around in a timely manner in order to make a living by delivering the clients' booked itineraries.

The nature of our work means that we spend a high proportion of our time on London's roads and like the Committee, we have noticed a significant increase in congestion over the past two years.

The four years since the London Olympics have been boom years for tourism in London. In 2015 there were 36.1 million inbound visits to the UK with London attracting 51% of all visits. Tourism is now the UK's fifth largest industry, third largest export earner and provides 9% of all employment. However, we are hearing increasing complaints from tourists about how difficult it is to get around and how this reduces their enjoyment of London. When tourists share these views in their home countries they damage London's reputation and make it less likely people will pick London as a holiday destination. It is increasingly difficult to assure tourists we're truly '#Open for business', when they compare their experiences in London with other major cities such as Edinburgh or Dublin. This is especially true for visitors who are well-travelled and with the kind of money we all want them to spend in London. After security concerns (which may be subjective) we believe that traffic congestion has become a significant objective threat to this important part of the London economy – yet it is one where specific, practical solutions that mitigate the effects are within reach.

The sector most badly hit by the increase in congestion is **group tours conducted by coach**. Compared to several other European cities London's historic centre is large and it is not practicable to walk between all major sights. In addition many of our customers have disabilities which make it impossible for them to enjoy London by walking. Coaches are used by tour agencies to ensure that their groups see the major sites in a reasonable time frame. London is also an expensive city in comparison with other leading tourist destinations, and to improve value for money, more accommodation is being booked by travel agents farther from the city centre, requiring transportation to the tourist sights and from entry points (airports, railway stations, cruise ship terminals). Many tourists in London are here for a short time as part of a longer trip and we are under pressure to ensure that they see as much as possible in the time they have.

We understand the desire to encourage more people to use public transport and a growing number of tour groups are now taking this option, removing some traffic from London's roads. However, for many visitors from America, for instance, it is a well-engrained habit to take taxis or Uber cars. Discretionary use of public transport still represents only a small proportion of visitor journeys in the London area and occurs more with smaller family groups, rather than large groups. Although more work can be done on this it has to be recognised that public transport will not work for all tourists because:

1. **They see less** - Travelling on the Underground means that tourists see far fewer sites as they are travelling underneath most of them. Particularly for those in London for a short time they will see less and take away a less positive experience of the city.
2. **Tour pricing** - Many tourists travel into London by coach and for tour operators to be able to offer tours at a reasonable price they need to continue to use the coach while in Central London.
3. **Hotel availability** - Often sightseeing tours start from an international entry point, such as Heathrow or St Pancras International and are conducted before the group check into their hotel. This is particularly the case for early-morning long-haul flight passengers, who arrive before their hotel room is ready. Even for the young and fit it would be a struggle to get between sites by Underground with their luggage.
4. **Familiarity with public transport and accessibility on the Tube network** - Many tourists we guide, particularly those traveling as part of a tour group are older people, often with physical limitations or unused to walking and in many cases on their first trip to a large city. It is difficult for a tourist guide to manage a large group getting on and off the Underground or public buses and this can cause unwelcome disruption to Londoners using the transport system every day for commuting to work.
5. **Many of the tourist we guide have disabilities** and the underground is not fully accessible, although we welcome the addition of lifts at Tower Hill station.

50 people using a coach is therefore a cost efficient and space efficient travel option in London's congested centre.

We address below the questions in your call for evidence where we think our experience might be useful. We are keen to support the Committee's work and would be very happy to answer direct questions from the Committee if requested.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

The major difference since the start of the works on the Cycle Superhighway is the amount of congestion on Victoria Embankment, Upper Thames Street and Lower Thames Street eastbound. This has been caused by the reduction in capacity to one lane and has significantly increased traffic and journey times. Based on evidence from our members, journeys that took 15 minutes now take 45 minutes or more. The Embankment - once such an asset to show off the beautiful River Thames and the sites along it - regrettably has become a time-consuming frustration for tourists and a route to be avoided on coaches or taxis.

We note that people seeking to avoid congestion on the Embankment are now using Fleet Street/Ludgate Hill and Stamford Street/Southwark Street on the south side of the river, down as far as the Elephant and Castle. The amount of congestion displaced onto these routes has also increased significantly. This is exacerbated by road works and the loss of the left turn lane from Stamford Street onto Blackfriars Bridge. Recently the situation has been made worse by the temporary closure of Newgate Street that removed another east/west route option. There seems to be a persistent problem on Southwark Street by the junction with Blackfriars Bridge which may be caused by traffic light phasing. By way of illustration, on 16th August a guide timed her journey by coach from Borough Market to the junction of Southwark Street and Blackfriars Bridge (a distance of less than half a mile) at 26 minutes.

We see significant problems around the Victoria one-way system caused by building works and around Parliament Square. The narrowing of the exit from Westminster Bridge on the north side of

the river means that traffic is queueing on the Bridge at all times. The loss of the left turn from Victoria Embankment onto Westminster Bridge is forcing more traffic into Parliament Square into order to turn and cross the Bridge. A typical report: 'I've taken 40 minutes to get from Great Smith Street (facing north) to Westminster Bridge.'

Traffic has worsened significantly around the Tower Hill coach park, where coaches often cannot get a space and are forced to wait outside, with the queue sometimes stretching back into Byward Street. This occurs throughout the day while the Tower of London is busiest. This is primarily due to the closure of English Grounds (by Southwark Crown Court), as coaches cannot turn in with the closure and narrowing of Tooley Street, which was used by coach tours for quick photo stops of the Tower from across the Thames. Due to this closure, more coaches have been trying to get into the Tower Hill coach park, the capacity of which was already inadequate. For smaller private hire vehicles (minibuses, taxis, Uber cars), the lack of parking and access in Trinity Square has exacerbated difficulties in transporting visitors to and from the Tower.

Specific examples from guides that illustrate challenges we face regularly:

"Details of a job from June 2016: Departure from Heathrow at just before 11am. Lunch booked for 1.30 at Minories, didn't make it to lunch until 2.55pm (direct route, no stops, no deviations for tourism!) Departed pub again at 4.30, didn't get to hotel near Vauxhall until almost 7pm, again with a fairly direct route. Some clients left group after the lunch, as couldn't face getting back on the coach again, so took tube to hotel and met us there."

"As an example, a couple of weeks ago, it took me two hours to get from the Natural History Museum to St Paul's without getting off the coach, a distance of approximately 5 miles. The driver checked his tachograph and established that we had only been moving for 28 minutes of that time - in other words, for over 75% of the time we had been completely stopped in traffic."

Another guide provided a description of how routes and options have been closed off to drivers using the example of a journey she has guided frequently since the Eurostar Terminal opened at St Pancras International in 2007:

1. The easy route from St Pancras to the Tower is down Farringdon Road but that's been gridlocked with contra-flow all year for Crossrail works, and as the project doesn't complete until 2018 I'm not hopeful that situation will improve any time soon.
2. Lower Thames Street/Byward Street has permanently lost one lane due to the cycle path. Even at 11pm at night the traffic doesn't move very fast so that route isn't an option.
3. In the past it could often be quicker to go over London and Tower Bridges and drop at the bus stop but that isn't possible because Tooley Street has been closed eastbound all year and Tower Bridge is due to close for three months in the autumn.
4. From Bank we sometimes went along Leadenhall Street and Aldgate to drop at the public bus stop outside the Tower but we can't do that as there is no longer a right turn from Aldgate High Street.
5. We were taking a route along Pentonville Rd, dropping down to Old Street, Moorgate and down the side of the Bank of England. Moorgate is currently closed southbound for building works.
6. And recently, to add to our problems, the traffic has been stationary when we leave St Pancras via Midland Road to try and turn left across the front of the station. That jam has got so bad that on Sunday 7th August we had to take a right turn and go via Gower Street, High Holborn etc - a ridiculously long detour.

7. Because it is usually impossible to get into the Tower coach park without waiting for 20 minutes/half an hour we always have to unload on a bus stop or single yellows. So we find our way to Eastcheap and usually walk the last ten minutes, crossing two roads.
8. On 17th June, even Eastcheap was closed for building works so we tried Leadenhall Street only to find Tom Cruise was in the middle of filming a stunt for a movie. This added further delay.

2. What are the key causes of these changes in congestion?

The main cause of congestion on the routes regularly used by coaches with tourists has been the **creation of the Cycle Superhighway along the Embankment and on Westminster Bridge**. As the major tourist sites are to be found in Westminster and then by the Tower of London, getting east-west within the central zone is vital to tourists to see the major sites in one tour. The loss of one lane east bound has dramatically increased traffic congestion and journey times between these two key locations. There has also been a knock on effect on other east-west routes notably along Fleet Street/Ludgate Hill and Stamford Street/Southwark Street. We have major concerns that another east-west route is now under threat with the proposals for Oxford Street. While coaches cannot use Oxford Street we fear the loss of capacity there will push more traffic onto the routes we use. We would welcome the opportunity for the tourism industry to work with the GLA and TFL on possible solutions to this.

The second major issue is the amount of **construction work** in the centre of London and the loss of road space to building sites. Some of the worse effects are caused by major infrastructure projects on behalf of public authorities. Crossrail continues to be an issue around Tottenham Court Road and Moorgate. The Bank Station upgrade has made it impossible to cross London Bridge from the south to the north within a reasonable travel time due to the lane reduction on the north side. The combination of the problems on the Embankment and the closure of Tooley Street eastbound has made it impossible to show groups staying in the west of London the Tower of London within a 2-3 hour sightseeing tour. These projects are vital to London but more thought needs to be given to managing the works traffic and space so that we don't lose major sections of roadway for years at a time. In particular where space is needed for the projects this should be taken from neighbouring smaller streets rather than the default option being the closure or lane reduction of London's major routes. There seems to be an impression that because TFL manage the roads and also the projects that if they need the roads for other projects it is fine just to lose the road space.

We welcome the fact that the upcoming Tower Bridge closure will be between October and December – a quiet time for tourist coaches in London – but we often feel that the **seasonal nature of tourism** is ignored when planning works. For the works on the Cycle Superhighway it was necessary for a time to remove the coach bays on the Embankment. This was done during the peak summer months when the bays would normally be at their busiest while better scheduling could have seen them removed at a time when far fewer coaches need to use them. We know that the works need to happen but feel that more thought could be given to the scheduling of works to not remove key tourist routes during the summer months.

Congestion is also caused by major private building projects. Most notable are the current problems around Victoria. Again the **scheduling** should have been considered so that Buckingham Palace Road, which is currently closed for building works, should not have been closed in the only two months of the year when Buckingham Palace is open to visitors. As already noted, the problems

along Stamford Street are exacerbated by the building project taking out the left hand turn lane onto Blackfriars Bridge.

We feel that in addition to the loss of road capacity there has also been **an increase in the amount of traffic using the roads** which has further added to congestion. Evidence from guides suggests that the major increase over the past three years has been from delivery vans and Uber/minicabs in London. This means that the Congestion Charge has no impact as these type of vehicles are exempt. Anecdotally, you can be driving along the road and 80-90% of the vehicles (excluding black cabs and red buses) are white vans (used for construction projects or delivery) or minicabs

A number of guides have also pointed out that outside of peak hours many public buses are running almost empty. As we often share lanes with them the **additional number of buses on the road** while really needed during rush hour are having the effect of slowing down traffic.

There is also an issue with **delivery vans** stopping in inappropriate places with little consideration for the effect they are having on traffic. As one guide noted: "Friday 12th August 8.30 am on Gloucester Road at the junction with Cromwell Road - this is a 3 lane two direction road. There were two delivery vans parked on opposite sides of the road and opposite to each other thus reducing the traffic to one lane and causing congestion." While there is no one place where this is a permanent problem running into one or two of these issues on a 2-3 hour sightseeing tour can add 30 minutes to the journey and forces the guide to cut out some of the major sites the group were hoping to see adding to a negative impression of London. More active enforcement particularly on red routes would reduce this problem.

In particular places the **phasing of the traffic lights** also seems to be causing a problem. We are not experts in this field and may not understand the impact changes would have on traffic coming from other directions but would really welcome TFL and local authorities looking at the phasing of the lights at the Trafalgar Square end of Northumberland Avenue, the Cannon Street end of New Change, the junction of Blackfriars Bridge and Southwark Street and the whole junction at Ludgate Circus.

Traditionally the best time to provide a sightseeing tour by coach was at the weekend when the traffic was lighter. However, over recent years there has been an increasing number of **short-notice road closures for constructions cranes and major events** in the centre of London necessitating major road closures. While as guides we welcome these events that bring more people into central London and help to animate the city, the impact across the year does need to be thought through better. The impression is that each event is considered on its own merits without an assessment of overall impact on other 'routine' sectors of the London economy.

Anything which can be done to hold these events outside of the major tourist season (Easter-September) would have the benefit of ensuring tourists can still see the major sites while they are here and possibly increasing the number of particularly domestic tourists coming outside of peak season, spreading the benefits of tourism further through the year – a key aim of London and Partners and one which we fully support. It would also be useful to set the dates much earlier (around 2 years to 18 months in advance) and share these with the tourist industry, so that travel agencies planning itineraries are in a position to take into account days when congestion is likely to be very high because of road closures. Road closure information is shared with London guides as soon as it is received, thanks to better communication channels lately established by TFL, the City and other road management authorities with ourselves and coach operators. However, by the time

this information is received it is usually far too late to reschedule core elements of an itinerary which has been planned and sold to clients well in advance.

3. What impact does congestion have on Londoners, the city's economy and its environment?

The biggest concern for us is the impact of congestion on London's economy and particularly on tourism which employs so many people in London. It is not just those who guide in traffic who are affected by congestion. We know that tourists are already taking away the impression that London is difficult to get around and when they share this at home it makes others less likely to book in the future, losing market share to other tourist destinations. It is impossible for tourists in London just for a day on an organised tour not to be disappointed when they are told they cannot see iconic sights, such as Tower Bridge and the Tower of London because it is impractical to get there on the roads in the time they have available. If we see a drop off in visitors this will affect those who work at visitor attractions, hotels, restaurants, theatres, coach companies, shops and other valuable sectors of London's economy.

It is easy to dismiss these concerns when London has seen an increase in tourism year on year since 2012 but last summer was the first time we heard significant complaints from tourists about their disappointment at how little they felt they were seeing during tours. We are already starting to feel the effect of tourists' negative experiences last year. Industry sources say Central London attractions have been 15% down for the first half of 2016 compared to the first half of 2015 whereas rest of UK has been significantly up. Security concerns have obviously played a part in this but it's likely that congestion has too. While we understand and support Central Government's plans to increase tourism outside of London this was to increase tourism in the UK rather than see the rest of the UK benefit at London's expense. Many tourists will visit London as part of a wider visit to the UK and a negative experience in London damages the whole UK tourist industry.

London cannot afford to be complacent and believe that whatever we do, tourists will always come – there are many other cities in the world spending the money to attract these tourists. As one guide pointed out, the difficulties with coach tours "does not engender a feeling of London recognising the requirements of visitors - it feels much more like "London does not really want you here" when I agree we truly do!"

The major environmental issue for London caused by congestion is that it dramatically increases air pollution, which guides are particularly aware of as we spend our working lives on London's streets. It is a priority for the Mayor to reduce air pollution but this cannot be achieved while congestion on the roads increases. Time vehicles spend idling in traffic and additional journey times caused by congestion undoubtedly are making London's air pollution worse.

We are also aware as guides that tourist coaches are contributing to congestion in London and therefore to air pollution. Needing to get tourists from place to place or past the major sights on a sightseeing tour makes this inevitable yet, as noted above, with up to 50 people on one vehicle coaches do make efficient use of London's congested space. However, as we now spend much more time sitting in traffic or are forced to take longer routes to avoid road closures as described above coaches and other traffic are having more impact on London's environment than in the past.

Even more frustrating is that coaches are forced to contribute to congestion and pollution even when tourists are not on board. Coach drivers are driving more than needed because of worsening or ill thought through provision of coach parking/drop-off bays in the centre of London, particularly near popular sights and destinations. This means that drivers are forced to drive around while their group is visiting a site instead of turning off the engine and waiting for them to come back. Where

there is coach parking it is now often paid for by phone which is hard to access by foreign drivers who speak little English and are unfamiliar with our roads. This is certainly contributing to congestion and air pollution in London.

In order to reduction congestion and air pollution more consideration needs to be given to the use of the River Thames as a transport route. The small capacity of providers at present means that it is not possible for large coach groups to all switch to using the river and in the summer months there are long queues to access boats. If parking provision close to a pier or piers outside the central zone could be provided and increased services run from there to Westminster and the Tower (which already have piers) this would reduce congestion. In particular this should be investigated in advance of the new cruise terminal opening at Greenwich in 2017.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

We welcome the lane rental scheme as a way to limit roadworks and encourage them to be completed as quickly as possible. However TFL is not responsible for all of London's roads and so the London Boroughs' rental schemes are also relevant. Undoubtedly the requirements to give TFL and the Boroughs more notice of works and the powers for Boroughs to co-ordinate roadworks between different companies has meant fewer roadworks in London.

However the fees for lane rental are relatively low compared to the overall cost of most projects and we know that the lane rental scheme is clearly not being effective everywhere particularly in relation to large scale building and infrastructure projects which are taking out whole lanes of major roads often for years at a time. We are not sure if this type of project is covered by the scheme but they need to be as although the works are not on the road themselves they are causing a loss of carriageway space in the way roadworks do. In addition to being included (if they are not already) the fees for the scheme need to be dramatically increased for developers to take any notice as the development is already costing them millions of pounds. If we want developers to think more innovatively and consider options which may be more expensive they need to feel the cost of closing parts of major roads.

Clearly it doesn't make sense for one part of TFL to be paying another part of TFL when they are the organisation carrying out the roadworks as was the case with the Cycle Superhighway. However the fact that the infrastructure works are being carried out for a real public benefit such as the improvements to Bank and London Bridge Stations or the Crossrail works should not mean that sections of carriageway are closed and allocated to the works without all other options being explored. In particular developers and public authorities need to look at how works can be phased to use parts of the development site for storage and works traffic rather than the roadway and look at how smaller streets can be closed rather than closing the adjacent major road.

One guide raised the example of the Bank Station works at the north end of London Bridge. "The other current problem is northbound on London Bridge where there is a construction site. They have created a permanent delivery/removal bay on the bridge which reduces three lanes to one. Surely this could have been created as a dynamic bay e.g. workers cone off the road only when it's needed - I have frequently seen the bay unused but the congestion is still there."

We know that the lane rental scheme considers the importance of the road and the time of day in its charging policy. We would also like to see the time of year considered in major tourist areas of London as closures have a much greater impact in the peak tourist season than they do at other times of year. The Angel Street roadworks to the north of St Paul's Cathedral have been on and off

all summer at a time when the coach bays there are most needed. Outside of emergency roadworks we would like to see a financial incentive for companies to schedule works to avoid the busiest times of year.

It appears that approval of lane closures for construction sites are considered in isolation. It should be possible to model the cumulative effects of closures and consider permissions and agreement to lane rental on this basis. One guide described a common journey for tourist coaches. “Let's say you go North - South over Westminster Bridge and along Stamford Street to get to the Tower of London (quite possible since the Embankment is now so bad). You hit a massive construction project on York Road by the London Eye on approach to Waterloo Bridge, reducing lanes and causing congestion. Then you would hit pretty much the same on Stamford Street on approach to Blackfriars Bridge and the same again as you come North over London Bridge approaching House of Fraser to turn right on Eastcheap. You now have to use London Bridge rather than Tower Bridge as Tooley Street is closed eastbound for another major construction project.”

We question how co-ordinated TFL and the Boroughs are when considering closures for works. Often you have one TFL road and several borough roads running parallel to each other. If it is not happening already information needs to be shared so that parallel routes are not closed or reduced at the same time.

We think it would be useful for the tourist industry to work with the GLA and TFL to map major tourist routes through London so that any applications for lane or road closures could be assessed for their impact in conjunction with other closures along these routes.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

The provision of the Cycle Superhighway along the Embankment, on Parliament Square and Westminster Bridge has had a major impact on congestion in central London. The reduction of the capacity to one lane eastbound has significantly increased traffic and journey times. Journeys that once took 15 minutes can now take 45 minutes or more. As noted above this has also had a knock on impact on other major east/west routes.

Guides, many of whom are also cyclists, recognise that we needed more provision for cyclists, but we did not need it where it has been located. Creating dedicated cycling routes on the many small, almost traffic-free streets parallel to the river which coaches cannot use would have been a solution which worked for both cyclists and coaches. Instead, the cycle network has been located on the routes most commonly used to show visitors around London as they can accommodate the large size of our vehicles which many streets, due to London’s age, cannot.

As one guide wrote: “In my experience as a guide over 12 years, the cycle lane system has contributed more than anything else to the current congestion. I am not alone in this: ask just about any guide who works on coaches, any driver guide, chauffeur, coach driver, bus driver, minicab driver or taxi driver.”

It is not now possible to undo the Cycle Superhighway on the Embankment but the lessons from this first section certainly need to be taken into account in the planning of future cycle routes. Any long term considerations of increasing road capacity also need to try and replace this loss of east/west capacity through the centre of London. What would also be possible at a lower cost would be a reconsideration of some of the junctions along the Superhighway and the loss of ability to turn right or left at certain junctions because of the priority given to cycle lanes. In

particular the new road layout is causing problems at the junctions of the Embankment with Blackfriars and Westminster Bridges and a consideration of how these could be improved would be a major benefit to coaches without the loss of space now provided to cyclists. If it was possible to reconsider the banned left turn at the end of Victoria Embankment onto Westminster Bridge this would really help to reduce the traffic in Parliament Square and ease the congestion there.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

We don't feel that this team has been very effective and worryingly for people who spend most of their working lives on London's road many guides did not realise that this team existed. As one guide said: "I have never seen this team in action".

London's congestion is made worse by a lack of box junction discipline - drivers moving forward and then being stuck, blocking traffic coming into the junction and by delivery drivers stopping in inappropriate places blocking traffic. Anything that can be done to strengthen this team and enforce the law at box junctions and on major but narrow roads being blocked by deliveries would make a major difference to congestions 'hot spots' in central London.

Conclusion

London is rightly one of the top tourist destinations in the world. Tourist Guides are frontline ambassadors for the city and as such have seen and welcomed the major improvements to London over the past two decades driven and supported by the Mayor and the GLA. The improvements in our public space, our public transport and the number of wonderful events held have had a major impact in attracting more people from the rest of the UK and all over the world to come and experience all London has to offer. This has also been great for London and Londoners with tourism expanding as a sector of the London economy and providing huge numbers of jobs.

However we often feel that the practical difficulties of being a tourist in London are overlooked and the day to day issues for the industry are not well understood by public authorities. First among these are the issues that congestion is now causing for the whole tourist industry and the negative impact congestion is having on the perception of London as a destination. Unless we try to tackle this issue we put at risk the increase in visitors that London has seen over the past few years.

We would really welcome the opportunity to work more closely with the Committee and the whole GLA to help you identify the issues and find solutions that work for Londoners and tourists. We recognise that tourist coaches add to the congestion in London but if we want to keep the industry thriving coaches will have to be part of the picture and we want to help find ways to better manage this.

If the committee is going to take verbal evidence as part of their investigation we would like to have the opportunity to come and speak to you and discuss these issues if you have the time. We would also like to offer the opportunity to the committee to come on a tourist sightseeing tour of London to see first-hand the impact congestion is having on tourists' experience of London. If committee members would like to take up this offer please contact Ruth Polling from the Association of Professional Tourist Guides who has drafted this submission on behalf of all qualified London guides.

We want to thank the Committee for looking at the issue of congestion which is having an increasingly significant, negative impact on one of London's most vital industries.

ice | london

Institution of Civil Engineers

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Dear Chair,

ICE's Response to the Consultation on Traffic Congestion in London

Introduction

The Institution of Civil Engineers (ICE) is an international membership organisation that promotes and advances civil engineering around the world. ICE is a qualifying body, a centre for the exchange of specialist knowledge, and a provider of resources to encourage innovation and excellence in the profession worldwide.

ICE London welcomes the opportunity to respond to the London Assembly Transport Committee's investigation and to find solutions to the issue of high congestion in London. Congestion can blight a city, affecting the environment, living standards and economic growth and ICE London looks forward to working with the Committee to find solutions to this issue.

Our Response

1. *How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?*

London's increasing population, which now stands at 8.7 million, contributes heavily to construction related traffic, numbers of drivers and numbers of deliveries. This trend looks set to continue - according to TfL's figures, congestion on London's roads is set to rise by 60% by 2031.[1]

TfL provides in-depth analysis of traffic in terms of vehicle type, borough and area. Congestion can be differentiated also in terms of cause (whether it is due to temporary maintenance/construction works/a local event, or increase in driver numbers). More analysis on the causes of congestion within each borough would be welcomed.

2. *What are the key causes of these changes in congestion?*

As stated above, population increases have been the key cause of congestion on London's roads. Whilst car use amongst Londoners is falling, the increase in population means London is still seeing high congestion. A number of issues exacerbate this, including:

[1] Roads Taskforce Update, TfL, April 2014

- A general move away from fixed times for activities, such as deliveries of goods and materials, means congestion can be extended throughout the working day. This can be attributed to online shopping and deliveries, as well as the rise of on demand services. The changing nature of and expectations of life and individuals associated with personalised on demand services and delivery reduce the opportunity to consolidate transport services. There are several initiatives promoted by Business Improvement Districts which aim to consolidate servicing and waste activities to reduce the number of vehicle trips in an area and use less locally polluting vehicles. These need to be extended and encouraged to minimise the impact of delivery vehicles.
- Diminishing impacts from the congestion charge. Demand reducing measures such as charging mechanisms often become less effective over time as they become consolidated in the cost of doing business.
- Low capacity on the rail system with incidents of overcrowding doubling since 2016.[2] Although London Underground passenger numbers continue to rise, commuting by car will continue to become more attractive if capacity is not increased, especially in Outer London.
- An increase in bus journey times. A recent report by Greener Journeys found that over the last 50 years, bus journey times have increased by almost 50% in the more congested urban areas.[3] This can heavily reduce the attractiveness of bus use.
- Road and maintenance works can often cause congestion on local roads. Boroughs could improve the congestion cause by these works by increasing collaboration with one another. TfL's programme of works for the Cycle Superhighway schemes and other major highway projects have affected congestion over recent years. TfL's Road Modernisation Plan should be examined to assess what impact it will have on future congestion levels.

3. *What impact does congestion have on Londoners, the city's economy and its environment?*

Economically, congestion will have a long term adverse impact on the economic wellbeing of both London and the UK due to the loss of productivity. Excess journey time constitutes avoidable waste, which if not avoided increases the cost of production for individuals and businesses.

Congestion also reduces the desirability of the city as a place to live and work due to the detrimental impacts on health and quality of life. Most apparent is the effect on air quality, with road transport accounting for 45% of Nitrogen Oxide emissions and 48% of particulate matter emissions in Greater London in 2010.[4]

4. *What can London learn from other cities in its effort to reduce congestion?*

There is some best practice within London in terms of freight consolidation schemes which should be further examined. For example, the London Construction Consolidation Centre in South Bermondsey.

5. *How effective is the Congestion Charge? How should this scheme be modified?*

The congestion charge's effectiveness reduces over time as it becomes an accepted cost of business. Being a daily charge it does nothing to reduce demand once a driver has made the decision to enter the zone and pay. Equally it can have a disproportionate impact on small low turnover businesses.

[2] London Underground delays caused by overcrowding have doubled since 2013, Evening Standard, February 2016
[3] The Impact of Congestion on Bus Passengers, Greener Journeys, August 2016
[4] Up in the Air: How to Solve London's Air Quality Crisis, Part 1, Policy Exchange, November 2016

A smarter Congestion Charge system would be particularly effective, taking into account the time of day when the vehicle is within the zone, how polluting the vehicle is and how long the vehicle stays within the zone. By tailoring charges to vehicle use, motorists would not only be encouraged to lower how much they drive, but also would encourage them to reduce the time spent within the most congested areas and to scrap their most polluting vehicles.

6. *To what extent would a usage-based road pricing regime help reduce congestion?*

A move to a usage charge could more closely align costs to the user to the capacity of the road - for example, a charge based on time spent within the Congestion Zone would make drivers consider the amount of time spent on the road. Equally a differential pricing mechanism could be used as a means of more closely matching demand and capacity.

7. *How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?*

The Ultra Low Emission Zone and Emissions Surcharge are likely to have a short term impact only whilst vehicle types change to those with lower emissions, but as with the Congestion Charge, will have diminishing returns in terms of road usage.

8. *What would be the benefits and drawbacks of these other interventions?*
   - *Tolling for river crossings or other major infrastructure*
   - *Workplace Parking Levy*
   - *Devolving Vehicle Excise Duty to London*

Interventions are designed to have a positive effect, but when localised they can invariably "skew" the system and can result in unexpected impacts. TfL must therefore ensure specific interventions within the wider transport network.

Tolling often pushes traffic to find routes that do not incur the toll hence increasing congestion elsewhere. This is why tolling, such as on river crossings to the East, must be for all crossings. Equally tolling can have the potential to increase traffic levels as it eases the journey that would otherwise have been avoided (due to previous excess time or congestion). Nevertheless, in certain locations of high predicted growth, such as the East of London, new river crossings and road infrastructure will be needed. In these locations, effective tolling and adequate traffic management by TfL are essential.

A workplace parking levy is unlikely to have significant impact in reducing congestion in central London due to pre-existing limited parking capacity. However, in outer London a workplace parking levy may be effective, although consideration should be taken that such a levy may be simply borne by the business that can already afford to provide the parking space. To avoid this, any parking levy would require business engagement alongside it to ensure employers are also encouraging their employees to consider other modes of transport.

Devolving vehicle excise duty to London will not have any direct effect on congestion, but would give London the funding and ability to speed up the delivery of changes which could have a positive impact.

9. *How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?*

Consolidation is also a particularly effective way of reducing the number of delivery vehicles around London, particularly with vehicles transporting construction materials. Currently, there are only nine construction consolidation centres in London, a number that could be increased by providing a congestion charge rebate for

consolidation centre vehicles. This may also encourage more businesses to uptake consolidation. Several Business Improvement Districts are actively pursuing schemes to consolidate freight and waste activities.

10. *To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?*

Increasing the number of minicabs potentially exacerbates congestion because they tend to operate loaded only in one direction. This can mean that for a significant part of the minicab's working hours it remains empty. A more effective data driven and data sharing approach has the potential to increase utilisation by "filling" return loads, therefore increasing the amount of time the minicab is in use. New technology has also led to more trips being taken by road which previously would use public transport, particularly app-based taxi services.

Improvements and changes to the bus system can also reduce the number of minicabs in use. TfL should review a number of bus routes to assess how journey times can be reduced and customer experience can be increased.

11. *What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?*

Car clubs can reduce the overall number of vehicles on the road and possibly reduce mileage by reducing "opportunistic or discretionary travel". However, current congestion levels tend to restrict this anyway. Reduced car ownership through use of car clubs can also lower road space occupied by parked vehicles, but this has comparatively little impact on the primary congested routes.

12. *To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?*

Current numbers of buses on some routes and their (comparatively low) levels of occupancy are actively driving congestion up, by competing for road space. Working out (using a dynamic system model) the optimum numbers of buses for the numbers of people being conveyed and adjusting service levels accordingly could increase throughput and reduce overall journey time.

13. *How can TfL further encourage a shift from private car use to public transport or active travel modes?*

Encouraging a further modal shift from private car use to public (or active) modes requires a combination of approaches. Regulation can either ban or restrict and can be targeted, although this requires enforcement. A pricing mechanism can be seen as a blunter mechanism as it has least effect on those with more resources or a greater willingness to pay. Viable public transport options must be invested in, particularly in suburban areas with low levels of transport connectivity. Schemes like Crossrail 2 and the Bakerloo Line Extension will help take vehicles off the road by giving residents quicker alternatives.

The experience from London 2012 shows how it is possible to significantly change demand without the need for major capital investment. Replicating this on a longer term basis has the potential to reduce current congestion levels by utilising the present capability in a more efficient way, such as by spreading the total load over the total number of hours available.

14. *Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?*

Road infrastructure can help to reduce traffic congestion by increasing capacity. However, care must be taken to ensure that Londoners are not encouraged to drive by ensuring there is adequate capacity on other transport networks, particularly rail, bus and cycle routes.

Any new infrastructure should be targeted at “evening out” the use of current infrastructure, removing “pinch points” and hence increasing the utilisation of those parts of the system that have capacity but can’t be used. Great care needs to be taken to consider the overall complexity of the transport network as local changes can have far reaching impacts remote from the point of intervention.

Yours sincerely,

Suzanne Moroney
ICE London Director

ICE London would like to thank the ICE London Transport Expert Network for contributing to this consultation.

Contact

For further information, please contact Max Sugarman, External Relations Executive, ICE London & South East
E: [redacted] **W:** [redacted] **M:** [redacted]

InterCity RailFreight

Using high speed passenger trains to bring a variety of freight into central London has proven to be capable of reducing road traffic whilst cutting pollution by using cycle logistics and electric vehicles for last mile deliveries. Likewise, planned high speed bulk trains can easily service major retailers and carriers

Submission to London Assembly Transport Committee

August 2016

Introduction

InterCity RailFreight (ICRF) has been invited to submit a response to the London Assembly Transport Committee's investigation into ways in which road traffic congestion and pollution can be alleviated in London.

Loading parcels/freight onto high speed passenger trains is faster, safer, cheaper and more reliable than the alternatives. Using carbon neutral couriers, such as WEGO, at either end makes it even more environmentally friendly.

This document aims to illustrate the alternative clean air delivery and sustainable transport methods provided by ICRF and its principal partner WEGO which have the potential to help ease the aforementioned problems.

Background

A landmark report from the Royal College of Physicians (RCP) and the Royal College of Paediatrics and Child Health (RCPCH) has set out the dangerous impact air pollution is having on the UK's health – with around 40,000 deaths a year linked to air pollution. (Source: Royal College of Physicians – February 2016.) Although government and the World Health Organization (WHO) set 'acceptable' limits for various pollutants in our air, the report states that there is in fact no level of exposure that can be seen to be safe, with any exposure carrying an associated risk.

Dr Andrew Goddard, the Royal College of Physicians lead for the report, said: 'Taking action to tackle air pollution in the UK will reduce the pain and suffering for many people with long-term chronic health conditions, not to mention lessening the long-term demands on our NHS. This is not just a job for government, local authorities or business – as individuals we can all do our part to reduce pollutant exposure.'

The body of evidence has grown stronger over recent years regarding the health consequences of air pollution at levels currently common in Europe. Of particular concern is NO2 (nitrogen dioxide). NO2 is one of several nitrogen oxides (NOx), gaseous air pollutants that are produced as a result of road traffic and other fossil fuel combustion processes.

The World Health Organisation (WHO) states that 'Epidemiological studies provide some evidence that long term NO2 exposure may decrease lung function and increase the risk of respiratory symptoms.'). Furthermore, according to DEFRA (Department for Environment, Food and Rural Affairs) it is estimated that the effects of NO2 on mortality are equivalent to 23,500 deaths annually in the UK. *(*Source: DEFRA Draft Plans to Improve Air Quality in the UK, 2015*)*.

ICRF and WEGO firmly believe that a cleaner, healthier environment benefits people, their communities and the environment. Clean air is vital for our cities to grow and prosper, making them safer and more pleasant places to live and work, both now and in the future.

Consequently, we recognise that we have a corporate responsibility to offer a more sustainable, futureproofed, clean air delivery transport and logistics solution, utilising trains, ultra-low emission vehicles, cargo and push bikes. Our aim is to prove that there is an alternative to diesel vehicles travelling into the centre of London and contributing to air pollution and traffic congestion.

Who are InterCity RailFreight?

ICRF is a supply chain management company working on the fourth party logistics (4PL) model i.e. it owns no assets but contracts in whatever it needs to fulfil the supply chain requirements of its customers.

The 4PL model has proven to be highly flexible and cost effective as the right mode of transport or facility for each individual supply chain challenge can be engaged: as supply chain dynamics change so the solution components can easily be changed to ensure that the supply chain continues to function efficiently and cost effectively.

ICRF specializes in rail transport, its principals having built up a significant amount of experience designing innovative rail-based solutions for a wide range of applications. Thus its knowledge of the railway network and its intricacies is extensive and this has paid off in developing the current passenger train operations model.

ICRF has been responsible for assembling the components to dovetail in with the basic model so that the passenger trains and supporting first/last mile courier services are able to carry a diverse range of commodities from documents to textiles and live shellfish to clinical trials samples.

Who are WEGO?

WEGO is a clean air delivery, forward-thinking courier service which aims to provide expert, sustainable and cost-effective last mile delivery solutions. It utilises ultra-low emission vehicles within city centres and, in partnership with ICRF, high speed trains between key cities to provide innovative same day and next day deliveries.

Presently, WEGO have depots in Nottingham, Derby, Leicester, Sheffield and London. They regularly deliver and store items ranging from letters, packets, parcels and medical supplies to larger equipment, such as furniture items. They serve clients in a diverse range of sectors including engineering, legal, retail, food, transport and the Arts.

Currently, WEGO City Consolidation Hubs provide a central point for filtering out deliveries to local clients in a sustainable and eco-friendly manner and help retailers with limited space, who can use WEGO storage facilities as their stockroom. They can then call off items, as and when required, saving costs on expensive prime rate shop space as well as time and resources. Additionally, WEGO can fulfil customer orders by delivering straight to their door.

WEGO are part of 'Go Low Nottingham', helping Nottingham to make electric vehicles and sustainable transport more accessible for all and boosting the area's eco-credentials whilst making a real difference to the environment and quality of life for local residents and businesses. They are also involved in Transport for London's LoCITY programme which aims to help the freight and fleet sector lead the way in improving air quality and reducing carbon emissions.

In addition, WEGO pro-actively collaborate with the UK Cycle Logistics Federation (UKCLF) and the European Cycle Logistics Federation (ECLF) to lobby the government for more consideration to be given to load carrying cycles when developing transport infrastructure in our cities.

WEGO's aim is to expand their services into other UK cities to provide a tenable substitute to traditional delivery methods. They will be looking at the expansion of their Consolidation Hubs, as well as introducing locker boxes and over-the-counter collection and delivery points in community buildings, such as leisure centres and libraries.

Chris Beattie, Managing Director at WEGO Couriers comments: 'The environment and sustainability have always been at the forefront of my business vision. Indeed, WEGO introduced electric vehicles to our fleet as early as 2003. I now have over 18 years' experience of working in eco-friendly companies and my vision is to extend our CLEAN Air DELIVERY model nationwide to help reduce harmful emissions, ease traffic congestion and to support our city centre businesses in London and beyond.'

The ICRF Multi-modal Model

In 2009, 5PL Ltd. (the forerunner to ICRF) engaged with East Midlands Trains (EMT) to establish whether parcel sized freight could be accommodated within the space available on the EMT rolling stock. Any health and safety and security issues were addressed and in October 2010, permission was granted to commence trials between Nottingham and London using High Speed Trains (HST). Couriers were engaged in both cities to load and unload the trains as the consignments were unaccompanied and a programme of thorough process testing was successfully completed.

In April 2011, EMT authorised the commencement of full time operations between Nottingham and London using the HSTs. Concurrently, 5PL Ltd. entered into partnership with WEGO Couriers to deliver the first and last mile aspect of this multi-modal model. Between April 2011 and November 2015, the EMT service gradually expanded with the key additions of intermediate stations and newer build rolling stock being cleared for use by the 5PL operation.

In November 2015 5PL became InterCity RailFreight Ltd. (ICRF) to reflect the steady change in its business to include high speed bulk services, primarily, for carriers and retailers seeking a fast and sustainable way to service London delivery requirements. In addition, negotiations were completed with Great Western Railway (GWR) and a new route opened between London and Penzance to serve the Cornish market. Moreover, WEGO established their zero carbon London operation resulting in the use of cycles and ultra-low emission vehicles at the first and last mile stages of the delivery which is unique in the UK.

Claire Perry MP, Rail Minister at the time, came out very strongly (and publicly) in favour of growth in the use of passenger trains for freight and this has also been reflected in the changes built into franchise bids by the Department for Transport (DfT) whereby innovation is very much central to the overall requirement to better, and sustainably, serve communities and businesses along the line of route.

ICRF and WEGO Track Record Since April 2011

- There have been no delays caused to the Train Operating Companies
- There have been no safety or security incidents
- The overall performance has been in excess of 99% in terms of on-time deliveries
- Cost Reductions ranging from 25% to 60% compared to equivalent road couriers

- Carbon Reductions in the region of 60% compared to a journey undertaken by diesel van (based on DEFRA figures)
- Increase in the range of commodities transported – from chilled food to ultra time-critical clinical trials samples
- No incidence of consignment loss or damage.

High Speed Bulk for London

Critically, a number of prominent carriers and retailers have recognised the renewed potential of rail to overcome key difficulties when trading in London:

- Congestion: travelling around London is becoming increasingly time-consuming and tying up up vehicles and drivers for increasingly longer periods has a direct impact upon operational efficiency and costs.
- This can prevent the undertaking of store replenishments during the working day which may result in empty shelves and lost revenue.
- If stock could be held, for example, in the Midlands and transported in frequently by rail then this is being seen as a better alternative
- Costs: property is expensive and serving the dynamic e-commerce market places huge demands on the supply chain given the need to have a wide range of stock instantly available
- HGV Ban and delivery hours: delivering by rail to key stations overnight and using (quiet) zero emission vehicles for last mile is seen as the way to influence changes to permitted delivery times

Presently, the running of high speed bulk services is rapidly becoming a reality: new rolling stock for the East Coast and Great Western franchises will release 125mph HSTs which have been proven as fit for conversion to freight use from around 2018.

Initial interest is focused on the London (Euston) – Midlands – Glasgow corridor. In 2012 and 2014 trials organised on behalf of Tesco, TNT and Sainsbury's (using 95mph wagons) running between Daventry (DIRFT) and Euston proved operationally feasible in terms of driving vehicles onto platforms at Euston and cross-docking consignments straight from the train into road vehicles for immediate delivery. Thus the use, once again, of stations as urban hubs was proven and the on-going role of stations is under the spotlight.

Euston

Euston station has proven its capability and could have the potential to be the perfect central urban interchange location for rail and zero carbon final mile delivery vehicles: its layout, large parcel mezzanine and connectivity to key freight corridors suggest that it could play a significant role in helping to reduce the number of road freight vehicles coming in to London.

But Euston in its present form is under threat from development by HS2. Plans are very unclear but if the ultimate ambition to bulldoze and rebuild the station is realised London could well lose a vitally important asset unless pressure is applied to retain the freight facility that was designed as a major hub to serve the former British Rail Red Star Parcels business.

ICRF has very recently held discussions with senior figures at Network Rail and these discussions look set to continue: from these discussions it is evident that Network Rail is very keen to see high speed freight on its network and recognises the important contribution this could make to both sustainable regional economic growth and helping to combat urban congestion and pollution in key towns and cities. Thus some influence could be exerted on Euston and also Network Rail's own stations' strategy.

The Courier World

ICRF/5PL has had over 5 years' experience dealing with London couriers and from this readily understands why reducing the number of diesel vehicles operating in the capital might be difficult:

- The vast majority of couriers are self-employed and contract to the courier company: they lease their own vehicles, pay their own fuel and hire the hand held terminals used to advise job details from the courier company. In return they are paid a mileage rate based on a loaded mile: some however are now charging by the hour given the issue of congestion
- Most drive diesel vehicles for the simple reason of economy: they may be called upon to perform a number of deliveries around London but equally might be asked to undertake a delivery in Glasgow which, commonly, attracts a higher rate
- The requirements for journey flexibility, low cost and fast job completion suggest petrol or electric vehicles are highly unlikely to find their way into these fleets

- Also to be considered is the fact that couriers are unregulated and when 'time is money' there is a tendency to avoid rest and keep on the move: how many accidents occur as a result?
- Likewise so-called "lifestyle couriers", a section of the industry that has seen growth in recent years as the large carriers gradually outsource their (expensive/loss-making) urban deliveries, may well pose a similar challenge, albeit with the additional issues of them carrying the correct insurance and earning the living wage. This has been highlighted recently by the unrest among Deliveroo couriers

Rail & The Wider Economy

Discussions with a number of regional bodies (Welsh Government, Cornwall Council, Scotland Food & Drink, Lincolnshire County Council, various food and manufacturing groups) reveal London as being a major target market. There is however a common thread: finding an effective route to that market.

The large carriers provide a, generally, low cost and effective overnight service and a great many producers rely very heavily on them. They are however largely dependent on diesel vehicles for the entire journey. One major disadvantage from using these companies is the lack of insurance as the vast majority operate via large hubs, the insurance underwriters see those hubs as major risk areas (damage/theft) and as a result producers have to run the risk of under-insured goods. The question of insurance is raised almost every time ICRF engages with a new producer: in some cases, losses of up to 15% in transit have been quoted with freshly cut flowers being a prime example and bottled goods another.

At the same time a significant number of producers operate their own delivery fleets and these again are all diesel vehicles. It is not uncommon therefore for a wide variety of goods to be brought into London from all around the UK by the producers in their diesel vans. There are several reasons for this:

- They retain control of delivery and customer service
- They can retain flexibility
- They can fully insure the product

Interestingly, a good number of own account operators (meats, seafood, flowers) recognise the sheer difficulty and cost of getting into and out of London and seek an effective alternative.

At the same time, they are aware of the opportunities available through the e-commerce channel, but equally that despatching items such as fresh food via the carriers carries large financial and possible customer health risks.

Rail is fast and, on most routes, trains run at an average frequency that ranges from every two hours to every 15 minutes. Thus it is perfect for e-commerce in that:

- Orders can be processed several times a day
- Orders can be mapped to specific rail services and fed into "click & collect" hubs at times to suit the customer
- For items such as fresh seafood it is feasible for the customer to order in the morning and collect the same afternoon
- Final mile is still in the hands of zero carbon transport

Compare this with the recent collaboration between a large retailer and a global e-tailer where the latter sells the former's goods and for £6.95 will deliver within the hour. This could potentially mean more diesel vans on the road.

Consolidation/CLEAN Air DELIVERY Hubs

Figures from the DfT amply illustrate the extent of empty running within haulage fleets comprising vehicles 3.5 tonnes and above: by their own admission if lighter vehicles were factored in the figures would be much higher. Simple observation in any town centre will reveal the number of lightly loaded delivery vehicles coming in each day; all adding to congestion and all creating pollution.

The new London mayor, Sadiq Khan, has stated his desire to bring forward the implementation of the Ultra-Low Emission Zone: he is also considering its extension to the north and south circular roads.

Combined with an increase in centre access charges for "the most polluting vehicles", this may give pause for thought, but is unlikely to result in a significant reduction in van numbers for the simple reason the charges could easily be passed back to the customer. Similar to fuel surcharges, a congestion charge can be claimed from every shipper within a multi-drop consignment.

More effective would be a simple outright ban and the transfer of freight to zero carbon vehicles for onward distribution. Admittedly consolidation centres have been tried before with varying degrees of financial success, but the question that most needs asking in London is whether the price of pollution at current or increased levels is cheaper than the cost of supporting a consolidation centre.

Sites at Stonebridge Park and Willesden are perfectly situated for easy transfer from road and/or rail to zero carbon vehicles: in the fullness of time freight could easily be transferred to passenger trains heading to or from Euston.

Buyer Behaviour

The online purchasing and delivery markets are growing, and with order numbers increasing rapidly, the use of tablet and mobile devices is driving round-the-clock purchasing habits. As a result, retailers are under pressure to both manage their stock and provide efficient delivery in terms of speed, price, service and quality. (Barclays 'The Last Mile Report' – Footnote 1, September 2014) It is worth noting that in 2013, products ordered online generated just over one billion deliveries. By 2018, this number is expected to grow by 28.8% to 1.35 billion. (The Barclays Report – Footnote 2) In order to facilitate growing demand, ICRF and WEGO are of the opinion that flexible, innovative and manageable delivery solutions can be part of the solution.

Buyer behaviour has a significant impact – retailers and restaurant owners wish to source products at the most competitive price and consumers want value for money. London is a huge market and competition is therefore intense, putting significant pressure on businesses to keep costs as low as possible; this in turn transfers pressure down the line to the producer who could be forced to seek the cheapest possible logistics solution, irrespective of the ultimate impact of their decision i.e. another diesel van coming into London.

Discussions with Clean Air in London reveal that more than 50% of Londoners would like an outright ban on diesel vehicles: the paradox however is that the demand for cheaper, or even free, deliveries creates the need to bring those diesel vans into city centres, as these are the workhorses satisfying that demand. A multi-modal transportation method, such as that provided by the ICRF/WEGO partnership, can offer a viable alternative to traditional delivery methods which rely heavily on said diesel vehicles.

The Eco Stars scheme has been designed in a bid to encourage operators to improve efficiency and reduce emissions. Undoubtedly this has had a positive effect, but does it offer an excuse not to consider alternatives to road transportation of goods?

The Sustainable Restaurant Association (SRA) has been running a sustainability star scheme for over five years, focusing on areas such as food waste and food miles, so the question is whether now is the time for hotels, restaurants and retailers to be adopting a clean air stars delivery scheme so that consumers can see that these businesses subscribe to zero carbon deliveries as much as possible. In return for greater patronage and business, they would be in a position to demand that suppliers seek out a low/zero carbon means of delivering into London.

Pollution and congestion will inevitably influence consumer behaviour as more people seek an escape and avoid the worst areas: this in turn will impact on businesses in those areas unless changes are made.

Potential for Expansion of the Business Model

Presently, discussions are on-going with other TOCs with a view to expanding the network. These include:

- Virgin Trains (Scotland to London)
- Grand Central (Yorkshire & North East to London)
- South West Trains (South Coast to London)
- Arriva Trains (North Wales & Birmingham to London)

The success of the ICRF model has prompted both discussion and interest in a number of key areas:

- The retro-fitting of passenger rolling stock with the means to generate flexible space i.e. convert seated to freight areas on off-peak services and/or use the trains on overnight delivery service (very much similar to airline/airfreight operations)
- The use of high speed (100-125mph) freight trains, in addition to scheduled passenger trains, to convey carrier and retail volumes straight into the heart of London for onward delivery by zero carbon vehicle.

Emerging Markets – Express Freight and Urban Logistics

ICRF and WEGO have proven that using passenger trains works and provides a practical, low carbon alternative for our city centres. Moreover, our high speed shared user freight trains are attracting significant interest from large retailers, e-tailers and carriers who have recognised the huge potential to overcome increasing city centre delivery restrictions and pollution controls; we can offer a completely new solution to e-commerce challenges whilst satisfying increasingly stringent environmental targets.

The plans to use high speed, shared user freight services will deliver anything from a full trainload down to a single parcel straight into the heart of London. This will enable a unique partnership to plan the first and last mile not only to deliver better resource utilisation, but to affect faster and more carbon efficient movement of consignments.

Operationally similar to existing Royal Mail services and utilising traction and rolling stock with passenger running characteristics, this sector can exploit the superior transit speed offered by rail over road. With two successful concept-proving trials of express freight services in the last five years utilising Euston Station, Network Rail are positively engaged with the key proponents in this emerging market.

Conclusions

Reducing congestion and pollution is a major challenge throughout the UK but especially in London: it has a huge impact upon people's health and the economy as supply chain cost and inefficiency hampers the UK's global competitiveness.

It is possible that technology can, to some extent, maintain something of a status quo but if people see things getting easier on the roads they will revert to road transport and the system returns to an imbalanced state

There does not appear to be a strategy for the UK's railways that seeks to place them within a wider economic context and ensure that network and rolling stock development receives the targeted investment to achieve strategic economic and social objectives.

Despite this, ICRF and WEGO have amply demonstrated that rail and the use of ultra-low emission vehicles does have a significant role to play in addressing the transport challenges; reducing congestion, pollution and supply chain waste and making better use of existing infrastructure.

From: David Harrison [redacted]
Sent: 02 September 2016 09:19
To: Transport Committee; [redacted]
Subject: Submission to congestion inquiry from Islington Living Streets

Dear Transport Committee

This is the submission from Islington Living Streets:

Islington Living Streets welcomes the inquiry into congestion. Our key points are:

1. Congestion is not just a matter for motor vehicles, but also affects pedestrians who suffer from the excessive distribution of road space to motor vehicles. For example, pavements are too narrow and there are too few crossings.

2. The answer to congestion is definitely not to provide additional capacity for motorists but to reduce the number of private motor vehicles using the roads and redistribute limited road capacity from motorists to other modes of transport, including walkers, cyclists and buses. Additional capacity for motorists would not reduce congestion, but lead to more cars on the road.

We recommend that a range of measures be undertaken to reduce the number of cars using roads, particularly in Inner London where other modes of transport are excellent and most households do not have access to a car. Particular emphasis should be placed on reducing commuting by car

These measures should include:

- Changing the congestion charge: Increasing the amount of to a level which has a significant effect on the number of cars entering the congestion charge area.

- Discouraging parking by introducing a parking levy; and reducing the number of parking spaces for non-residents in Inner London

- Closing rat runs: commuters should use main roads

- Redistributing road space from private vehicles to pedestrians, cyclists and buses

- Curbing the number of minicabs

In addition, measures should be taken to make walking more attractive. This would enable a modal shift for short journeys, reducing congestion. Walking also brings huge health benefits. Measures should include

- Establishing agreeable walking routes (rather than piece-meal improvements)

- Making it safer and easier to cross roads: by Installing more zebra crossings attending to danger spot for example at roundabouts

- Making pavements wider where they are inadequate

Finally, we have concerns about governance arrangements at TFL. The TFL Board should include someone who has a background in sustainable modes of transport

Key questions

In this investigation there are a number of specific questions the Committee is seeking to answer, as set out below. Respondents should address any questions where they have relevant views and information to share, and feel free to cover any other issues they would like the Committee to consider.

General questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

ITS (UK) is of the opinion that TfL/DfT must already have all the monitoring data they need to answer this question.

2. What are the key causes of these changes in congestion?

ITS (UK) would need to know the changes to attempt this question, but increased roadworks and roadspace re-allocation are likely to be key reasons.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Obviously negative on all these aspects, but quantifying this would need new research.

4. What can London learn from other cities in its effort to reduce congestion?

The demand for mobility will continue to increase. So in general there is a need for demand management, especially of private vehicles, in one way or another.

Many European cities are banning diesel vehicles, and further policies are forming. In Sweden, Norway, France and Germany, plans have become firmer to ban internal combustion engine vehicles from cities completely by 2025, and similar proposals in Switzerland, Belgium and the Netherlands are receiving high voter support. Implementation will depend on political leadership by the parties in power, and the ability to create a climate of continuous improvement.

In terms of charging for road use, London of course has been an inspiration to other cities, including Stockholm and New York, in its implementation of the congestion charge. But London can also learn from these cities - and from Singapore.

Stockholm and Gothenburg

In Stockholm, a permanent charging scheme was introduced in August 2007, following a successful trial (a full but time-limited charging scheme, in which Swedes had to pay real tolls to drive into the city) between January and July 2006. This demonstrated the benefits of the scheme – traffic fell 28% (much greater than predicted), and there was no diversion onto other routes; but the traffic

reappeared when the trial ended. This large reduction in traffic was achieved with a relatively modest charge of SEK 10-20 (85p-£1.70 – the charge varied by time of day), and was held constant for 10 years, having recently been increased to 11-35 SEK. It is a tax, so evasion is a criminal offence. Public acceptability rose throughout the trial period, as people experienced the benefits, and up to the subsequent (positive) referendum; it has continued to rise since, reaching 74% in 2010. Note that extra buses as an alternative mode of transport were provided from August 2005, but there was no effect on road traffic until the Congestion Tax began in January 2006 – which means that provision of extra public transport of itself will not reduce traffic and congestion. For more details, see Walker, J. (2011) "The Acceptability of Road Pricing". http://www.racfoundation.org/research/economics/road-pricing-acceptability.

A similar scheme went live in Gothenburg in 2013, based on the Stockholm scheme. Its aims were to raise investment, reduce congestion and improve the environment. Traffic across the cordon fell 12%; commuters switched to public transport, other travellers changed their trips and destinations. The annual gross income from the scheme is 71M€, with running costs of 12M€ pa. The scheme designers found that it was not easy to copy Stockholm; scheme design is difficult - a local transport model is needed. The scheme was implemented by the local authorities without any consultation, in order to secure central Government grants; but the citizens had the right to demand a Consultative Referendum, which they did. It was held in September 2014, and 57% voted against the scheme. Nonetheless the local authorities decided to retain the scheme, though they did undertake to investigate whether other methods of congestion control could be as effective. For more details, see "The Gothenburg congestion charge. Effects, design and politics", M Börjesson (KTH) & I Kristoffersson (Sweco), Transportation Research Part A: Policy and Practice (2015).

New York

New York's initial attempt at a congestion charge in 2007 failed - it was blocked by a minority of Representatives in the State Assembly despite 67% public support; but a new proposal, "MoveNY", is gaining traction. New York's public transport system is overloaded, and under-funded. The so-called "Move NY Fair Plan" proposes to collect over $1 billion per year through bridge tolls and congestion charging, enabling better public transport services. The plan, proposed by a former city traffic commissioner, will rationalise tolls on existing bridges, reducing charges on some and imposing charges on others which are currently free. Charging will be entirely electronic, using the existing E-ZPass electronic tag system, supplemented by number-plate recognition cameras. To reduce congestion, different prices would be charged at different times of the day. Taxis and similar services such as Uber and Lyft would pay a per-mile fee for operating in central New York, but would be exempt from tolls. The new tolls and fees would enable the public transport authorities to finance repairs and upgrades, build new subway lines, convert existing railway lines into new subways, reduce fares, create new bus services, and invest in cycle lanes.

The key point is that MoveNY is an overall, New-York-wide, fully integrated plan, using modern and proven technology, rather than a piecemeal approach. London would benefit from taking the same approach, especially if tolling of specific roads and river crossings is contemplated.

Singapore

Singapore operated a manual road pricing scheme called the Area Licensing Scheme (ALS) from 1975. A motorist purchased and displayed a paper licence to enter a restricted zone (RZ) in the city during weekdays and part of Saturday. The cost was higher in the morning and evening rush hours, and depended on the type of vehicle. The ALS was a very useful traffic management measure, but was cumbersome, labour-intensive and inflexible, and was replaced by an automatic microwave Dedicated Short Range Communication (DSRC) system called the Electronic Road Pricing (ERP) scheme in 1995; this necessitated the use of electronic tags in vehicles and large, unsightly and expensive gantries across roads. However, the scheme is a powerful traffic management tool. Traffic patterns change over time; average speeds are measured on the priced roads, and charges adjusted to ensure optimal usage of the road while avoiding congestion.

However, the gantries are expensive to replace, and with the improvement in satellite-based charging technology and receiver units, a second-generation scheme is being implemented, with "go-live" in 2019-20. Bulky and expensive gantries will not be needed, though lighter gantries may still be necessary for enforcement cameras. The new system allows distance-based pricing, which is more equitable for motorists. Value-added services will also be possible, including real-time location-based traffic information and electronic payment for parking,

In its 2014 "Infrastructure 100: World Markets report" KPMG says that:

> "Thanks to its Intelligent Transport System, Singapore is one of the least congested major cities in the world despite a growing urban population and limited physical space. This integrated pay-as-you-use system maximises the capacity of the road network with vehicle quotas, sophisticated electronic road pricing (ERP) tolls that vary according to traffic flows, and alerts to drivers, all controlled in real time from an operations center. Consequently, average car speeds of 27 km/hour compare favorably to 16 km/hour in London and 11 km/hour in Tokyo.

So London can learn a great deal from Singapore, New York, Stockholm and Gothenburg in its efforts to reduce congestion.

Charging for road usage

TfL already operates the Congestion Charge scheme in central London, and pollution-based charges are in operation or will be introduced. *(TfL operates the Low Emission Zone, with an Ultra Low Emission Zone and Emissions Surcharge also proposed).* Tolling of specific roads such as river crossings has been proposed. The Mayor also has the power to introduce a Workplace Parking Levy.

5. How effective is the Congestion Charge? How should this scheme be modified?

The congestion charge has been very effective – and very influential – see Q4 above. Congestion may have returned to previous levels - because Mayors have taken road capacity away from conventional traffic in favour of pedestrians, cyclists and other users (Transport for London, "Drivers of Demand for Transport in London", September 2014).

The scheme could be modified by extending it throughout Greater London, to address congestion outside the central zone, with charges varying by time of day and distance travelled. A longer term aim would be to unify it with the Low Emission Zone, and the Ultra Low Emission Zone; charges can be varied to take account of emission classes, which is effectively what the LEZ and ULEZ do on a cruder scale.

Note that the use of Low Emission Vehicles (LEVs) does not reduce congestion, and there is a danger of 'mixed messages' confusing the public. Encouraging the use of private LEVs in cities (e.g. by providing charging points) might improve air quality, but could also increase congestion and thereby potentially even worsen overall traffic emissions. Schemes have to be carefully designed. Specific measures to deal with pollution and safety can be promoted with better chance of acceptance, which might not be the case if they are combined with less popular charges.

But as the Eddington Transport Study said in December 2006 'The potential for benefits from a well-designed, large-scale road pricing scheme is unrivalled by any other intervention'. The DfT agreed.

6. To what extent would a usage-based road pricing regime help reduce congestion?
(For instance this may entail charging vehicles by distance driven, rather than charging for entry to a specific geographical area).

Presumably this question means that charging could be by distance driven, *within a specific geographical area* such as the Central Zone, or even within the M25. Such a charge would minimise distance travelled – under the current system there is no incentive to reduce mileage (and hence pollution and wear and tear on roads) once the charge has been paid. But as indicated in Q4, traffic modelling would be needed to design the most effective scheme.

ITS (UK) would be able to facilitate discussions via our Road User Charging Interest Group, which provides a wide-ranging forum for best-practice implementation of charging schemes and their technologies.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

The likelihood is that congestion would reduce initially, but would increase as low emission vehicles entered the vehicle fleet. This was found in Stockholm (see Q4), where alternative-fuel vehicles were allowed free residential parking in central Stockholm from 2005, and were exempt from the Congestion Tax from 2006. There was also a "National Purchase Rebate" for "green" vehicles from 2007. But the numbers of LEVs grew significantly (28% of new vehicle purchases in 2008). And since they contributed to congestion if not to pollution, the exemption from the Congestion Tax for new vehicles was removed in 2009, as was the free residential parking and the National Purchase Rebate. And in 2012 the LEV exemption for previously exempt "old" LEVs was stopped.

8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure

The benefits would be sources of funding for additional infrastructure, and a means of addressing congestion. See our response to Q5. The drawbacks would be significant "political" opposition, with the need for extensive public information campaigns, preferably backed up by demonstrations and trials as in Stockholm (Q4).

- Workplace Parking Levy

The idea originated in Australia, and Sydney, Perth and Melbourne all have WPLs. The only UK city with a WPL currently is Nottingham, introduced in 2012. Oxford, Cambridge and Birmingham are reported to be investigating a WPL, though Bristol City Council rejected it in 2008. Businesses in Nottingham with more than 10 parking places pay a charge, currently £375 per year per parking space. In 2013/14 the levy generated £8,453,000 for Nottingham City Council with expenditure of £809,000.

So the benefits are £7.6M available for investment in public transport, and an incentive for modal shift towards public transport.

The drawbacks are the political risk where drivers think they are already taxed enough through fuel duty and vehicle excise duty, and the increased tax burden on businesses – there is some evidence that businesses have relocated from Nottingham because of the levy. Also it could cause resentment from employees if the charge is passed on to them.

However, there seems to be no published research on cost-benefit analysis of WPL, particularly its effectiveness in comparison with road pricing. It seems likely that Local Authorities perceive this approach as being less politically sensitive than road pricing – especially as businesses don't have votes.

- Devolving Vehicle Excise Duty to London

The Chancellor announced in the 2015 Budget that from 2020-21, Vehicle Excise Duty in England would be hypothecated into a new Roads Fund, to be spend on new roads and repair of existing roads. This would seem to be a positive step, addressing the complaints of motorists that they pay far more in tax than is spent on roads. No further details are available but presumably the funds would be available to Local Authorities such as TfL in London.

Measures to target specific types of vehicle

Heavy road users – like commercial delivery vehicles, minicabs or private cars – could be targeted with specific measures. There could also be efforts to reduce bus traffic.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

These include:

- A key development is the use of telematics and in-cab technology to create more efficient routing plans, and to change driver behaviour. Commercial users gain up to 20% benefit in reduced fuel consumption and lower emissions. About 30% of commercial vehicles use such schemes in the UK. This is a big topic, and can be explored further if desired. Further, TfL has engaged the services of companies such as PIE mapping to provide guidance to regular users on routes for both day-to-day and irregular deliveries and congestion avoidance. GLA should promote awareness and encourage the use of such applications for delivery vehicles. Low emission zones, which limit access to the most highly polluting vehicles, can work in conjunction with in-vehicle monitoring and routing systems to encourage time-shifting of road usage and modal shift.
- Congestion benefits are gained by the concentration of deliveries into fewer vehicles by use of distribution hubs. The growth of online ordering services increases the delivery traffic, also with increasing pressure to deliver in shorter times. This will worsen the congestion problem. Commercial companies (e.g. Nectare) are expanding delivery services to cater for 'final mile' deliveries. GLA can work with the private sector to optimise the use of road capacity.
- An integrated approach to road usage at peak times has been piloted in a number of European countries with positive results. There is a range of potential solutions both for private and commercial drivers, which are beyond the scope of this response. ITS UK will be able to engage with GLA to explore options. Encouragement of vehicle operators to cooperate in sharing journeys can be a win-win scenario, saving money for road users while reducing vehicle count. Incentives for behaviour change can be commercialised where road and toll operators have freedom to encourage third party services.
- Where appropriate, ITS-based measures can include dynamic lane control, traffic light control and access management at certain times.
- Improved parking access for delivery vehicles can improve cooperation with councils. The use of ITS communications devices to book ahead for parking, and the creation of virtual spaces via GPS-based applications are two examples of measures to limit cruising and illegal parking. Coupled with enforcement where necessary, some major improvements are possible where parking violators cause congestion.
- The imposition of a congestion charge, as indicated in the response to Q4, is a generic solution, which can be tailored for specific locations. Charges are varied to reflect time of day, location and type of vehicle, thereby altering operator and driver behaviour.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

This is not a topic ITS (UK) has studied.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Car clubs and particularly car-sharing organizations can reduce the need for personal vehicle ownership, and the latter can reduce the number of single-occupancy vehicles on the roads, thereby reducing congestion. But this is not a topic we have studied in enough detail to comment further.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

ITS (UK) believes that London already has an excellent bus system.

But Intelligent Transport Systems (ITS) have a role to play in greater efficiency and ease of use (smart ticketing, reliability, personalised services, Mobility as a Service (MaaS - see Q13 below), efficient routing (monitoring and varying routes to suit mobility needs).

Many Public Transport services, for local and longer journeys, require travel through central London as a hub – there may be a benefit to creating more peripheral services, as opposed to radial routes, so that fewer travellers need to access over-used routes.

But detailed study is needed to quantify an answer to this question, particularly for modal change (car to bus).

Also please see responses to (13) below.

Encouraging modal shift

Greater use of more sustainable transport modes, particularly public transport, walking and cycling, would help address congestion.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Our first response is to ask whether this is the right question. In his IET Sir Henry Royce Memorial Lecture given on 1 December 2015, Professor John Miles (of Cambridge University and Arup) reflects on the reasons why the car dominates our urban environments and explores the challenges of freeing our cities from the log-jam of traffic congestion and associated pollution which currently seems inevitable. As he points out, Low-Speed Autonomous Transport Systems (L-SATS), also known as “pods”, travelling on roads, may be one of the solutions. They emit only 9gm of CO2 per passenger-km, compared to 15-60g/passenger-km for rail and underground systems and 20-75 g/passenger-km for buses, depending on load factors (the number of people on the bus or train). His lecture can be viewed on IET.TV -- see https://tv.theiet.org/?videoid=7380 .

If, however we do wish to encourage a shift from private car use to public transport or active travel modes, we need to go further with a combination of carrot and stick approaches (e.g. better services/infrastructure for public transport and active travel, whilst also increasing restraint on private car use (congestion charging, greater parking controls/pricing, etc.).

Also (a) Financial incentive (make public transport much cheaper to use than the private car … although this is not an inclusive policy - the rich can easily absorb the motoring costs); (b) Make public transport more attractive, easy to use, and safer than the use of the private car -easier said than done, but comfortable, spacious, modern, clean vehicles and stops / facilities, supported by accurate, consistent, personalised travel information that makes the traveller feel more in control of

his / her journey than they would feel in the car. For example, the proposed Mercedes “Future Bus” - a semi-autonomous bus with different spaces for different travellers:

- The central "express zone" - reserved space for standing passengers going a short distance.
- The rear "lounge zone" for longer-distance travellers.
- The "service zone" near the driver where passengers can look up information.

The Future Bus is expected to be fuel-efficient because of its optimized acceleration and anticipatory driving style due to early detection of bus stops and traffic lights.

The following is an abridged version of a paper in ITS (UK)’s Intelligent Transport Systems Review 11 April 2016, describing a Xerox survey and report on European Mobility. Xerox is a member of ITS (UK) and the full report is available from https://www.xerox.co.uk/en-gb/services/transport-solutions.

Make transportation faster and easier to use, and we’ll use it.
Most Europeans get to their destination within a half hour on average – with two notable exceptions. Londoners and Parisians face extraordinarily long travel times – with 27% and 26%, respectively, traveling for longer than an hour. And they tend to use well over the European average of 2.09 different modes of transportation (including cars) more than once per week. People in large cities such as London and Paris also experience more than their share of delays, which adds to travel times and makes journey times unpredictable.

Multimodal transport that works: the only way to change behaviours
When asked which factors would lead to increased use of public transport, respondents clearly identified the two big ones in addition to cost:

> **Improved service:** faster journey times, more frequent service, better information and new routes.
>
> **Integrated ticketing: o**ne ticket that can be used for multiple (or all) modes of transport.

These responses suggest a need for better connections – allowing riders to go from car to bus, to train, and to access easier methods of payment, as well as making journeys more predictable.

Engineering the customer experience
Commuters do consider cost of travel and environmental friendliness in choosing how to get around. But those factors are overshadowed by two other factors: convenience and speed. This phenomenon is consistent across all modes of transportation, and it helps to explain why cars are still one of the most popular travel options in Europe – even though very few people think of them as cost-efficient, or eco-friendly.

Giving travellers a ‘nudge’
The primacy of speed and convenience may not be a massive surprise – but the fact that cost only ranks third in people’s priorities is valuable information for transportation strategists. They can use it to influence travel behaviour in two ways:

- Make speed and convenience your main concern. Develop transport strategies to win over the people who currently drive – by improving performance, specifically on speed and convenience. is there a way to provide more frequent services, better connections, more routes?
- Leverage people's readiness to pay. The convenience and speed of driving are valuable. Review and adjust the price of parking (or tolls) to local market values.

What people mean by…
Convenience: amenities (such as toilets, waiting rooms, cafes), distance from home, comfort, reliability, and transparency about available routes and system performance.
Speed: overall travel time, the least chance of delay (including the time to find parking), and the best connection times.

Actively managing parking
We've seen that the cost argument doesn't necessarily keep people from driving, but it becomes hugely important once they need to park. Drivers choose where to park based on two factors: how much it costs, and how likely it is to find a space near their destination. A quarter of Europeans experience delays when parking more than once a week. While 71% of all respondents said they usually find a space (where they work) within five minutes, 6% look for parking for longer than 15 minutes, and 3% look for over half an hour.

The city centre challenge: minimising cruising
If 1 in 10 people look for parking for over 15 minutes, the impact on congestion can be significant. Drivers who circle the block looking for parking significantly increase traffic gridlock and pollution. Some cities leverage drivers' cost-consciousness – through parking apps that highlight available spaces and their cost – as in Westminster. This enables drivers to make informed decisions of where to park – and even to reserve a space.

The worst cities for parking
Parking is easiest in Belgium and the Netherlands region, where four out of five people find parking within 5 minutes. But in London and in Paris, only about half of all respondents find parking within five minutes. And nearly a fifth needed up to a half hour to find a space.

What exactly is Mobility-as-a-Service?
Mobility-as-a-Service (MaaS) is a new concept which combines all forms of personal transport (bike- and car-sharing, trains, buses, metro, etc.) together into seamless trip chains, with bookings and payments managed collectively for all legs of the journey, often via a mobile app that works in many cities. It means that people will have access to all the means of transport available, without long-term commitment, or the need to own a car (or even a bike) themselves.

The data imperative in European transport
Parking, convenience, speed, the connectedness of services: many of the transportation priorities that are emerging for 2016 aren't so very different from past years. The biggest challenge still remains that of aligning what respondents want and what transport policy makers have set as their

goals (within their budget). What's different today are the new capabilities we have to align policy with behaviour: the smart use of transport data to optimise convenience, frequency, speed and cost for respondents in developing environment-friendly, cost-efficient transportation ecosystems.

Data is at the heart of transforming mobility in our cities in the following ways:

- Optimising connections between modes for faster travel times
- Minimising the cost of operation and increasing convenience based on data analytics of actual travel behaviour
- Delivering better information services for respondents driven by real-time data – for any journey, time of day, or mode of transport
- Producing connected systems that are ready for the transport users of the future

Data has opened new opportunities to improve the transportation experience. While some European cities are already exploiting the growing amount of available data– from sources ranging from social media to parking sensors and video cameras – others are only starting out. But data is here to stay, and learning to use it to improve mobility in our cities is in the interest of any transport decision-maker.

Providing new road infrastructure

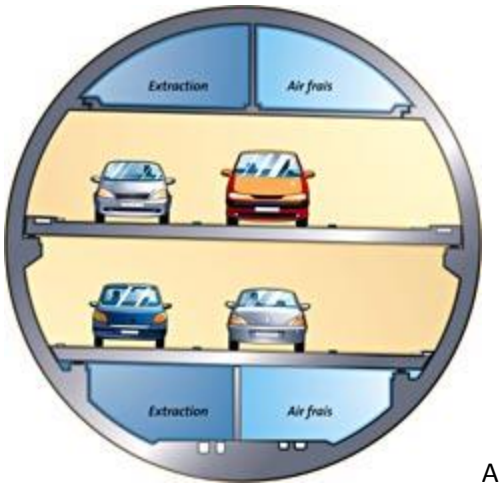
There are proposals for new road infrastructure in London, including river crossings and tunnels, which TfL has considered or is now actively pursuing. These include, for instance, the Silvertown Tunnel across the Thames in east London, and a tunnel from A40 at Park Royal to the A12 at Hackney Wick.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Detailed study would be needed on this, but suppressed demand is likely to be a significant issue in limiting congestion reduction. And there is a danger of induced traffic – see Q15. But in principle new road infrastructure could help to reduce traffic congestion.

"Metro-route" Tunnels

ITS (UK) is not qualified to comment on what specific new infrastructure is required in London however where new infrastructure is needed, ITS (UK) suggests that tunnels could be one option, and in particular the double-decker tunnels ("metro-routes") proposed by Christian Gerondeau in his book "Transport in Europe", published by Artech House. The book itself is now out of print, but an article written for the ITS (UK)/TEC magazine, which describes these 2-decked tunnels, could be made available. The tunnels are restricted to cars, so 2 decks of 3 lanes each can be constructed in a standard-bore tunnel (one deck in each direction), as opposed to only one deck of two lanes if trucks are allowed. An implementation of these ideas, the so-called "Duplex A86", has been constructed as part of the A86 Paris outer ring-road, in the Versailles area west of Paris. The tunnel takes vehicles less than 2 metres in height, and has now been open for several years. See http://www.vinci-construction-projects.com/projets.nsf/en/geographical-zones.htm?openagent&f=Duplex%20A86



A “metro-route in cross-section

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Certainly the 1999 SACTRA report described the phenomenon of induced traffic – where a new road encourages people to drive when otherwise they would not travel or would use public transport. Though of course taking this to its extreme, no new roads would ever be built. The answer is a combination of new roads and restraint measures such as charging for use of the new infrastructure – the “user pays” principle – an equitable approach.

16. How should new road infrastructure be funded?

The backdrop here, as noted by the Assembly, is that a four-year fare freeze will cost TfL an estimated £640 million in lost revenue, and in the next 5 years TfL will receive £2.8 billion less in government funding than forecast – so there is a funding shortfall noted of £3.4 billion, which TfL has to address.

Prior to the Mayoral election TfL was proposing to meet existing challenges, recognising priorities set out by the GLA, as seen in: https://tfl.gov.uk/info-for/media/press-releases/2016/march/tfl-publishes-2016-17-budget-and-business-plan.
In this case the funding can come only from central or local government, or from users. In the latter case there would be charges for use of the new infrastructure, and in these economically straitened times, user charges would seem to be the best and most equitable option.

Maximising available road space
Space on London’s roads is often restricted by construction work or other roadworks. TfL uses measures such as a lane rental scheme to manage this. In some cases, road space is diverted permanently for other key priorities such as cycling infrastructure or improved pedestrian space.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

This is not a topic area that ITS (UK) has studied in sufficient detail on which to comment authoritatively.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

This is linked to Question 2 and would need some detailed analysis to answer.

Active traffic management

TfL uses technology to monitor and manage traffic, for instance altering traffic signals to respond to incidents causing congestion. It has also recently introduced a Road and Transport Enforcement team to provide an on-street response.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Vehicle locational data, individual journey delay data, and deviation of journeys from schedule data could all be combined to identify road network hot spots (allowance has to be made for use of bus lanes and atypical delays at bus stops due to unusual passenger boarding and alighting volumes, of course), which can then be correlated with road works data and incident data to identify if such hot spots are being caused by the road network itself (road space use, traffic signal timings …), or because of temporary road network conditions caused by road works and / or incidents.

iBus provides detailed bus operational/performance data in real time and for planning. It should contribute to real-time network state estimation and support real-time congestion management strategies, where further development would be beneficial (e.g. to protect significant bus corridors from congestion). It is also suggested that bus service speeds (or journey times) and their variability should join bus regularity as a key performance criterion, with level/quality of service targets set.

Quality of service targets are currently set for the buses as part of the franchise process and monitored through the iBus system. We would suggest that there are elements of the system that are not used as widely or effectively as they could be, such as priority for late vehicles at traffic signals. And adding things like occupancy monitoring to the bus systems could support future decision making. In central London we have observed queues of traffic which are largely buses and they are not that full apart from during peak hours.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

This is not a topic area that ITS (UK) has studied in sufficient detail on which to comment authoritatively.

Response to the Investigation into traffic congestion in London

The John Lewis Partnership.

The John Lewis partnership operates a large number of stores throughout inner & outer London, from conventional supermarket and convenience stores, (Waitrose) to large department stores, (John Lewis) being serviced and supported by regional distribution centres and home deliver/consolidation hubs.
On a daily basis primary distribution, and home delivery vehicles enter the capital to collect and deliver goods to these stores and other work and home locations
The views and comments below are given from collected data and operational experiences, and collated by John Lewis Central Transport.

1 Changes to traffic congestion in recent years

There has been a distinct increase in traffic numbers, which has lead to increased journey times in not just inner London, but outer London and including the M25.
This has resulted in reduced travelling times across London, in the last 4 years, 2012 > 2015, 5 miles in Central London is taking 29 minutes as opposed to 20 minutes +45%, with 4 minutes of this being in 2015.
Outer London has increased from 15 minutes to 19 minutes + 30% , with 3 minutes (75%) being in 2015.
The M25 and surrounding roads have become the starting point for longer journeys into London.

2. Causes of changes in congestion

Buses
Cycle and segregated highways
Reduced traffic and 20mph zones
Road closures and one way streets
Road works
Bus lanes
Increased private cars
Light commercial vehicles inc home delivery

3. Congestion impact on City's economy and environment

This has a direct impact on slowing goods deliveries and services into shops and other locations.
London's economy has grown faster than the UK, more than 3% annually since 2008 compared to the UK growth rate of 2% and is adding to congestion within the City.
Also employment figures of in excess of 5.5 million jobs in 2014 is up 5% on2013 and 12% on 2008, all have to be moved around London and looking at the underground performance 2012>2015 the use has increased significantly, being 3.2% up in 2015 surpassing the usage levels seen during the 2012 Olympic games

4. Lessons from other cities

London is very unique and as an example the London Lorry Control Scheme (LLCS), adds to the congestion problems suffered, and needs an urgent review to consider if it is still fit for purpose, this combined with the lack of space or land availability and the population growth over the next 14 years will only make the current situation much worse, it would appear that some other cities are able to manage these traffic flows much easily, and have the capacity to increase infrastructure.

5 Congestion charge effective or modification needed

The Congestion charge has become less effective as it does not appear to have reduced the number of smaller and private cars entering the Capital, in fact it has a negative effect on commercial vehicles having to make deliveries.

6. Usage based road pricing to help reduce congestion

A usage based charging system would help the congestion situation by reducing unnecessary journeys, but again a strong balance would need to be made in favour of commercial vehicles only entering London to make a delivery or collection.

7. ULEZ and emission surcharge to affect congestion levels

This scheme will affect congestion levels initially until such time when cleaner vehicles are being used, ie electric, gas, and diesel Euro 6, and to some extent Hydrogen, all of these technologies are showing considerable advancement over what was available 2/3 years ago. This must include all vehicles types, however this should not be extended London wide for freight vehicles, and such a scheme should not be introduced any earlier than the proposed 2020 date….this is will be fairer for vehicle operators, and more cost effective.
After 2020 there should be at least a 6 month grace period for commercial vehicles as suppliers will struggle to meet demands.

8. Effect of tolling for river crossing or other major infrastructures/work parking levy/devolving VED to London

The effect of any tolling will be to push traffic away to other areas.
This in turn will increase congestion and journey times, but again freight will need to have a favourable consideration with a view to non charging or heavy discounting.
Work place parking levy, will solve one problem, but will push people onto an already overcrowded & stretched public transport system so will cause another transport problem.
VED revenue, raised in London, could remain in London and not be used for the national strategic road network as is being planned for 2020 to ensure that London becomes self-supporting from this revenue

9. How to reduce delivery vehicles in congested areas at peak times

An urgent review is needed to London Lorry Control Scheme, as it is not considered a modern approach scheme to controlling vehicle movements, plus it has a number un reasonable operating factors
At the present moment it only allows freedom of movement for 76 hours out of 168 hours available (45%) without using designated routes as laid down by the scheme and this can add many hours and cost to the operation, making it totally unacceptable to the freight industry

10. Minicabs effect traffic congestion

Question ? does the TC (Toxcity Charge) apply to taxis and uber cars?

TfL must licence / regulate and control mini cabs and all other taxi,s in the same way as it does with black cabs

11 Car clubs help congestion and how are these encouraged/electric cars

Pedestrianising streets and installing hundreds more charging points is going to be detrimental to the freight industry unless planned very carefully.
Electric vehicles are one of the modes for the future, but the plans for charging stations/points again must be thought out and consulted upon very carefully to ensure that deliveries into all areas of London are not curtailed further.
It is estimated that by 2020 there will be more public locations to charge electric cars than there will be petrol stations

12. Bus services to help reduce congestion and how

Reduce empty running
Understand passenger needs and flows
Simplify bus network
Develop a tram/light rail system which is a much cleaner mode of transport and can in effect move more passengers.

13. How can TfL shift use from private car to public transport

Increase congestion charge for all cars with no discounts
Stop overcrowding on transport modes
Keep fares competitive, ie travel cards
Improve performance
Make franchised train operators more accountable for late running and failures.
Make it easier to deliver freight via river

14. Can new road infrastructure reduce traffic congestion and how

Yes roads can be improved to help cyclists/pedestrian's safety but this must be done in detailed consultation with the freight industry to ensure that negative effects on essential movement and services are minimised, and that traffic flows are maintained and journey times are not compromised.

15. New roads leading to more cars, how to avoid

There is a very big risk of this happening so TfL must,

Not encourage the public to use their cars by charging a full payment of CC and TC

Introduce car exclusion zones (Similar to what is done in other European cities)

Give freight priority to effect deliveries (Once the hotspot and problem areas have been fully identified)

Take what was learned during the Olympic games 2012 with regard to road management.

16. Funding of new infrastructure

By using the following:

PCN revenue from all local authorities, including car parking.
LLCS fines until the scheme is reviewed
VED as per the previous comments re funding
Revenue from tolls on new and existing schemes
ULEZ All revenue returned

17. How effective is TfL's limiting of road works and can they made more effective

This has not been effective, especially in and around the Greater London area, and the following should be considered:

Far more enforcement & publication of action taken
Greater preventative measures & utilities working together more
Closer monitoring on works being carried out with an overall feedback from buses, black cabs etc on time taken to complete….this is a major issue.
24/7 working on all critical routes
It must be remembered that increased congestion from road works increases journey times and all the negatives that go with this.
London's building plans of 59k houses per year equates to 7715 hgvs per working day, combined with the above this will only help to increase the current congestion and journey times.

18. Additional space to cycling and pedestrian infrastructure effects on congestion

The impacts of this are now becoming visible, especially with regard to vehicle journey time increases and traffic congestion as a direct result.
Also kerbspace, essentially required for freight deliveries, has been made inaccessible in certain locations.
Future changes to enhance cycling and pedestrians must take into full account the needs of freight , however the safety schemes for cyclists and pedestrians are welcomed….but the correct balance for road space must be maintained.

19. Can enhanced technology help TfL manage congestion and how

It is understood that TFL uses many systems to control congestion, ie SCOOT for the traffic lights, and IBUS, to help understand bus locations/tracking.
Whatever control systems are used, if road space is reduced, traffic and journey times are increased there will be a conflict between what the system wants and what the real time situation requires.
TFL will need to keep changing and adapting their systems to try and meet the needs and demands of what is currently happening on London's roads.

20.Has the Road and Transport Enforcement Team tackled congestion

This team could be a lot more effective if it enlisted help from other interested parties such as buses, black cabs etc using their feedback to get a more rounded understanding of current road situations.
The individual CEO,s often do not help in loading/unloading situations ..there almost needs to be a more joined up approach and consistency plus better understanding of the problems and issues faced when making deliveries into London.

21 Conclusions

Freight has an essential roll in servicing the needs of London.
For example 90% of all goods moved in London are moved by road which will equate, when the population reaches 10 million, to 17445 vehicles per hour 24 hours, 7 days a week.
Freight must operate, and be allowed to operate, in a way that is efficient for the industry/customers but not at the overall expense of our environment and communities.
London is the first metro to surpass 100-hour threshold per annum for wasting hours in gridlock (101 hrs) with Stuttgart second at 73 hrs and Antwerp third at 71 hrs
Congestion involves extra travelling time and/o unpredictable arrival times and is caused by an imbalance between travel demand and transportation capacity (remember there are 168 hrs in a week) being caused through road works, road incidents, bad weather conditions, lack of unloading space/facilities or these already being used on arrival.
Finally freight/delivery vehicles only come into the capital for a specific reason, to collect or deliver goods…to provide a service, they will leave as quickly as possible after, unfortunately they are often prevented from doing this by many of the issues mentioned in this report.
Finally attached is a photo taken at 10.45am on Friday 19th August, showing a Partnership vehicle being held up in traffic along Lower Thames Street.
It took 15 minutes to get through this junction as the traffic congestion went beyond this, whilst the new cycle lane to the left (which used to be part of the road) goes unused.

Jerry Ward, Manager Legal Operations, John Lewis Central Transport

[redacted]

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Georgina Wells
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Friday 2nd September 2016

To whom it may concern,

BRENT COUNCIL RESPONSE TO THE LONDON ASSEMBLY TRANSPORT COMMITTEE'S INVITATION TO COMMENT REGARDING CONGESTION IN LONDON

Brent Council would like to thank the London Assembly Transport Committee for its invitation to comment regarding congestion in London. Brent has prepared a response based on the twenty questions put forward by the Transport Committee.

Part 1: General Questions

Q1: How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Brent does not maintain any data to show specifically how traffic congestion has changed, however it's clear from TfL data, particularly iBus delays, and anecdotal evidence that while congestion has generally decreased since 2000, there has been recent increases in congestion.

Q2: What are the key causes of these changes in congestion?

The key causes of changes in congestion vary between long-term trends and localised developments. The long-term reduction in congestion across London can be attributed to decreasing car use and ownership rates since the mid-1990s. In Brent alone, there has been a 4% reduction in vehicle kilometres travelled between 1993 and 2014[1], while the population of the borough has increased by 32.7% over the same period[2].

In local areas, such as regeneration areas and town centres, congestion may have increased through demand on local road space for use by increasing numbers of buses, construction or delivery vehicles. These vehicles can reduce the capacity of road space available through standing or frequent stopping on the carriageway. This growth has been particularly contributed to by Light Goods Vehicles (such as vans), for which vehicle registrations have increased by 44% since 2004 compared for 11% for total vehicle registrations[3]. In many parts of the borough, Brent is unable to provide additional dedicated kerbside loading space, which can lead to vehicles obstructing the flow of traffic.

[1] Department for Transport, 2014, Table TRA8904, Road Traffic Estimates in Great Britain: 2014
[2] Office of National Statistics, 2015, Estimated Resident Population Mid-Year (1961-2014)
[3] Department for Transport, 2016, Table VEH0105, Licenced vehicles by body type, by upper and lower tier local authority, United Kingdom: 2004-2015

Q3: What impact does congestion have on Londoners, the city's economy and its environment?

Traffic congestion in London provides for a variety of challenges and benefits to the city and its environment. For Londoners, vehicular traffic congestion exacerbates existing air pollution, which has a wide range of public health risks for residents. In addition to this, it can act as a brake on economic activity across the city, costing businesses in lost time, thus reducing the productivity of product deliveries and services. At the same time congestion on the road network also helps encourage more residents to travel sustainably, using public or active transport, particularly due to the travel time savings these modes often represent compared to private vehicles. .

Q4: What can London learn from other cities in its effort to reduce congestion?

While there may be lessons to be learnt from other cities in efforts to reduce congestion, we recommend that TfL undertake this research and, in collaboration with London Boroughs, determine which examples may provide suitable lessons for the city.

Part 2: Charging for road usage

Q5: How effective is the Congestion Charge? How should this scheme be modified?

TfL monitoring of the Congestion Charge shows it has been successful in reducing the number of vehicles entering Central London since it was introduced in 2003, however a portion of the benefit of this has been offset by reductions in road space within the Congestion Charge area for increased pedestrian space or improved street environments. The Congestion Charge also resulted in increased congestion on main roads approaching Central London, including Harrow Road and Kilburn High Road[4].

Notwithstanding these comments, Brent recommends that TfL investigate options for how the scheme may be modified and provide evidence for the Borough to consider. Brent will assess any proposal on its merits

Q6: To what extent would a usage-based road pricing regime help reduce congestion?

Brent has not undertaken any studies to understand the extent to which usage-based road pricing could affect congestion. While the Central London Congestion Charge has proven effective in reducing congestion[4], this area also has a dense public transport network which provides suitable alternative transport for most travellers. In the event a future proposal is made to implement usage-based road pricing near Brent, we would consider the proposal on its merits, specifically in relation to people's ability to pay and optimisation of associated benefits for Brent's residents.

Q7: How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

Brent Council strongly supports the approved Ultra Low Emission Zone and proposed Emissions surcharge, as we outlined in our response to the Mayor's Clean Air Proposals – Phase 1 consultation in July 2016. We believe this will reduce number of private vehicle trips into Central London, however we are concerned about the number of vehicles which will be displaced onto bordering roads such as the North Circular Road, similar to the impacts of the congestion charge on the Inner Ring Road and North London radial routes. Brent is concerned that any increase in traffic along these roads may exacerbating existing air quality issues and impact on the borough's efforts to improve air quality. For reference, Brent's response to the Mayor's Clean Air Proposals consultation (dated 29th July 2016) is attached.

[4] Transport for London, 2008, Congestion Charge impacts monitoring – sixth annual report, released July 2008

Q8: What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London

For clarity, Brent has considered each of these proposals individually below.

Tolling for River Crossings or other major infrastructure

Brent has not investigated the impacts of tolling for use of major infrastructure. In the event a future proposal is made to implement tolling on major infrastructure near Brent, we would consider the proposal on its merits.

Workplace Parking Levy

Brent has not investigated the benefits and drawbacks of a workplace parking levy on residents and businesses in Brent. We would recommend that TfL undertake research to understand the social, economic and environmental impacts of any such policy and report their findings to London Boroughs for further consideration.

Devolving Vehicle Excise Duty to London

Consistent with our response to the Mayor's Clean Air Proposals consultation, Brent has not been provided with sufficient information to understand the impacts of this proposal. It is also not clear that these funds are not provided to the Greater London Authority or London Boroughs through alternative funding sources which are already used for road maintenance, such as Principal Road Maintenance funding through the Local Implementation Plan. We would recommend that TfL undertake research to understand these issues and report their findings to London Boroughs for further consideration.

Part 3: Measures to target specific types of vehicle

Q9: How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Brent supports the use of freight consolidation centres and freight re-timing to minimise the number of delivery vehicles on London's roads and improve their reliability and economic efficiency. At the current time however, these schemes are largely in their infancy and may require significant investment to affect significant change. The Mayor and TfL may consider further investment in these schemes across a broad range of economic centres in order to encourage their uptake.

Q10: To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

While we understand there has been a considerable increase in the number of private hire vehicles licensed to operate in London in recent years, particularly due to innovations such as Uber and other ride-sharing technology, we believe this has resulted in a reduction in the average number of vehicle registrations per property, therefore, while Brent will consider any proposals to improve the regulation of private hire vehicles on its merits, we do not believe the increase in these services has been entirely negative.

Q11: What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Generally speaking, responsibility for managing the introduction of car clubs lies with highways authorities (including TfL on the TLRN) working with car clubs as commercial entities. Notwithstanding this, the Mayor and TfL may elect to support further expansion of car clubs, including those which meet other policy objectives (such as electric vehicle car clubs) through the Mayor's Transport Strategy or funding to boroughs to support Traffic Regulation Orders which are required for implementation.

Q12: To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

All of the data and relevant information in relation to bus services is held by TfL. We recommend that TfL undertake research to determine specific interventions to the bus network which may help reduce congestion, and assess their effectiveness. Brent will consider any proposals within the borough on its merits.

Part 4: Encouraging modal shift

Q13: How can TfL further encourage a shift from private car use to public transport or active travel modes?

TfL has experienced great success in encouraging modal shift from private car use to public transport since it was established in 1999, however the Travel in London Report 8 (TfL, 2015) shows there has been limited London-wide modal shift to active transport. In Brent specifically, there has been a decrease in active transport since 2007/08. Brent supports TfL in encouraging further modal shift away from private vehicles, particularly where this is in favour of active transport, so as to address a range of policy objectives (including air quality, public health and congestion). Brent would support schemes which deliver targeted improvements to walking and cycling conditions across Brent, including cycle routes and footway improvement projects, or initiatives to encourage more residents to shift to active modes, such as cycle training and road safety training for children. Any schemes proposed by TfL would be considered on its merits.

Part 5: Providing new road infrastructure

Q14: Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

While we believe there may be opportunities for new road infrastructure, such as additional river crossings in East London, Brent believes the congestion improvements are largely short-term, with additional capacity often consumed by additional demand for road space. We believe the greater strategic benefit of new road infrastructure is in network resilience, whereby the broader road network is less severely impacted by events, such as road closures.

Q15: To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Brent does not maintain data to evidence a response to this answer. We would recommend TfL undertake research to investigate this risk and interventions to address any such impact.

Q16: How should new road infrastructure be funded?

There are a variety of funding mechanisms available for new road infrastructure, depending on its location, purpose and strategic value as part of the broader transport network. Brent do not advocate for a particular method of funding, but rather this should be assessed at the time of proposal on a case-by-case basis. At the present time, Brent has not allocated any borough general revenue on capital spending on new road infrastructure, however where justified, we would support the development of new roads through Community Infrastructure Levy, Section 106 or Section 278 developer contributions

Part 6: Maximising available road space

Q17: How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

Brent supports efforts by TfL to reduce the impact of roadworks on the Transport for London Road Network, including TfL's lane rental scheme, which has reduced the proportion of customers

disrupted due to roadworks and increased customer satisfaction with the management of road works[5]. We are not aware of any proposals which would make the scheme more effective.

Q18: What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

While no data is available to assess the effect of recent cycling and pedestrian infrastructure improvements on congestion, TfL's most recent monitoring report on the effectiveness of the Congestion Charge (dated July 2008) states that some of the benefits realised from the Congestion Charge was offset by reduced road space following improvements to pedestrian and cycling infrastructure, such as the remodelling of Trafalgar Square[6]. We would recommend that TfL undertake monitoring on roads surrounding new cycling and pedestrian infrastructure to further understand the effects of this infrastructure on congestion.

Part 7: Active traffic management

Q19: How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

There are a range of existing and emerging technologies which could help TfL manage and plan for congestion across the London road network, particularly in the areas of vehicle counting and detection technology, alongside improved variable message signs to communicate to drivers. It is not the Borough's responsibility to advocate for a specific technology, and TfL should assess each of these on its merits.

TfL's existing iBus system has proved invaluable in tracking bus vehicle delays, and this information could potentially be used to inform TfL on general traffic delays, however we are unsure of the reliability of using this data for this purpose and believe alternative technology should be investigated to ensure the greatest possible return on investment for TfL.

Brent believes the greatest benefit for TfL to utilise new technologies is for planning purposes, where they can result in improved information reliability and reduce costs for TfL in information gathering.

Q20: How effective has the Road and Transport Enforcement team been in tackling congestion?

Brent has no evidence to assess the effectiveness of the Road and Transport Enforcement team.

We believe we've made our thoughts clear through the comments provided above, but if you'd like further clarification on any item raised, please feel free to contact Brent's Transportation Planning Manager, Rachel Best on [redacted].

Thank you for your consideration of these comments.

Yours sincerely,

Cllr Eleanor Southwood
Lead Member for Environment

[5] Transport for London, 2015, Transport for London Lane Rental Scheme Monitoring Report (July 2014-March 2015)
[6] Transport for London, 2008, Congestion Charge impacts monitoring – sixth annual report, released July 2008

London Assembly – Transport Committee.

Investigation into traffic congestion in London – invitation to submit views.

Response of the Royal Borough of Greenwich

1. ***How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?***

Despite the increased investment in public transport and an increase in cycling and walking it is clear that journey times across London have increased as a result of congestion. The impact this has on road based public transport a known issue.

There is evidence that the length of the peak periods, when congestion is prevalent, has increased, that congestion has increased at the weekends and, in the late evenings at particular locations.

For the Royal Borough of Greenwich (RBG) primary areas of congestion remain on the Transport for London Road Network (TLRN) , the Strategic Road Network (SRN), and on the approaches to the two Borough River Crossings (the Blackwall Tunnel and Woolwich Ferry).

Generally the local road network in the Borough is still coping, with the exception of certain hotspots. Ensuring the smoothing of traffic flow by the implementation of 20 mph zones and limits on all residential roads, and where possible facilitating bus priority measures are key to managing this – and the long term funding to implement these schemes remains a concern.

For RBG, major congestion is frequently caused by the limitations of vehicular river crossings – both capacity and resilience wise. Both Blackwall Tunnel and Woolwich Ferry are already at capacity and suffer from a lack of resilience. This means increases in vehicle numbers wishing to access them manifests itself in congestion on the A102 and A205 approaches. This has the knock on effect of causing congestion on the local road network – which is exacerbated at times of operational failure at either crossing.

Although TfL's proposals for an additionally tunnel at Silvertown go some way to address this RBG still has areas of concern. The effect of Silvertown whilst addressing congestion at the tunnel itself potentially has the effect of:

- *Causing longer delay at Woolwich Ferry and Rotherhithe (where TfL are not proposing to introduce demand management charges)*
- *Even if TfL's modelled figures of no additional/induced traffic overall prove accurate the scheme could be seen as causing additional local congestion by a faster 'through put' of traffic in the southbound pm peak – effectively compacting the pm peak and moving the congestion further down the A2/A206 networks.*

It is clear that the "journey purpose" of those drivers caught in congestion varies across the day – with a higher proportion of commercial light van drivers involved in early peak period journeys and traditional commuters and those involved in school related journeys representing a hig prortion of journeys later in the morning peak particularly.

2. What are the key causes of these changes in congestion?

London as a rapidly expanding city is a root cause.

Consequently although generally car use (as a mode share) is decreasing, numerically journeys continue to grow. The use of light goods vehicles is an area which sees a large predicted growth. TfL's emerging sub regional transport plan (2015) show their 2001 -2031 predicted growth London wide to be c24%. For the eastern sub region this is 31%, and for RBG 44%.

The poor performance of the Train Operating Companies in the South and South-East of London combined with the cost using public transport combines to encourage car based commuting rather than the use of public transport and is another cause of congestion.

Streetworks have been better co-ordinated and the introduction of the London Permit Scheme and lane changing have, to a limited extent, reduced

the duration of road works. However the positive impact of better co-ordination etc has been undermined by the sheer volume of activity that has needed to take place of the road network – whether it has been to mitigate the impact of spatial development (particularly in areas of intensification), the need to maintain the utility and road infrastructure, the need to improve the quality of the public realm or to support the increase in cycling and walking.

When taken in combination with a rapidly growing city and very limited options (or desire) to increase the network itself then better allocation or prioritisation of road space and/or suppression of demand on the existing road network are the most obvious solutions.

3. ***What impact does congestion have on Londoners, the city's economy and its environment?***

The effect of lack of journey time reliability, through congestion, on businesses is well documented.

Despite significant increased investment in more sustainable transport, congestion is constraining growth, delaying the improvement in air quality that would otherwise flow from new technology and legislation, impacting on employment options for the most disadvantaged Londoners and generally limiting Londoners enjoyment of their city.

The financial cost to London is significant.85 per cent of all freight traffic is still carried by road, with LGV movements expected to grow by 30 per cent between 2008 and 2031. Goods vehicle trips are also very difficult to switch to other modes. The Freight Transport Association has calculated that each minute of delay caused by congestion costs the operator (and hence the consumer) £1.

Journey time predictability is important. Congestion makes it difficult for businesses to plan their operations with certainty and results in a range of inefficiencies including businesses having to build in extra time to allow for uncertainty and their missing time critical deliveries which let down their

customers and can affect future business opportunities. It also constrains employment options for the least advantaged who often use buses for longer distance travel.

4. ***What can London learn from other cities in its effort to reduce congestion?***

London needs to better understand the relationship that exemplar cities have with their Governments which result in higher levels of investment and/or subsidy and better performance of the railways that serve them.

London needs to learn more from cities that are harnessing new technology to reduce the need to travel and/or reduce the impact of essential journeys.

The EU funded Horizon 2020/Smart Cities (for which RBG is the UK demonstrator City) is designed to share best practice on a number of platforms.

One specific work package relates to smart mobility, and whilst a lot of the work is linked to reduced emissions it also encompasses alternative (and often shared) mobility solutions. For example the municipality of Milan's fleet of electric powered delivery vehicles is developing technology which includes a 'smart routing' system, which not only plans routes to avoid congestion it also links these 'decisions' to the remaining charge of the vehicles battery, and plans the route to coincide, at the appropriate time, with an available (and pre bookable) electric vehicle charging point.

There are likely to be opportunities to learn similar lessons from further afield. London needs a strategy for identifying those opportunities, seizing them and ensuring that best practice is understood and affordable at a local level.

5. *How effective is the Congestion Charge? How should this scheme be modified?*

TfL is best placed to provide the data on the effectiveness of the Congestion Charge. Any analysis should include work to determine whether the Charge has had any significant impact on movements and congestion in Outer London (through modal shift).

6. *To what extent would a usage-based road pricing regime help reduce congestion?*

Potentially this is an effective mechanism, however it would need to be carefully examined in relation to other existing (and proposed) charges and tolls, and also ensure it did not disproportionally effect those least able to pay and those small and medium sized businesses which are vehicle reliant.

7. *How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?*

These schemes are primarily designed to manage and improve air quality and the new Mayors proposals are welcomed in principle – albeit that the Royal Borough believes that the ULEZ should extend beyond the current Congestion Charge Zone area.

The effect of ULEZ may be to suppress unnecessary journeys through the ULEZ and marginally reduce congestion within the ULEZ, but a concern for RBG is that this could initially impact on congestion and air quality locally as drivers of non-compliant vehicles avoid the Zone to avoid the cost of the charge.

The initial impact would be keenly felt in RBG if the South Circular was the boundary of an expanded ULEZ.

The ULEZ is explicitly not about reducing congestion, the primary aim is very much to clean up the fleet, so slightly counter-intuitively, a successful ULEZ could have a negligible impact on congestion

8. ***What would be the benefits and drawbacks of these other interventions? – Tolling for river crossings or other major infrastructure – Workplace Parking Levy – Devolving Vehicle Excise Duty to London***

In its response to numerous consultations on vehicular River Crossings the Royal Borough has accepted the need to introduce charges for need crossings in order to manage demand and meet construction and operating costs whilst expressing concern over the absence of charges on adjacent crossings. The Council accepts that additional vehicular river crossings, with integrated public transport, in south and east London are necessary to support growth and development and that it should be possible to introduce a charging regime that balances the benefits and disadvantages of new crossings.

For road users the management of multiple (often seemingly overlapping) charges is difficult, as is the tendency to feel 'penalised' as a driver, especially when their alternative options are limited. Clarity of both reason and operation are crucial, as is the hypothecation of income raised to an identified scheme/project.

The devolution of VED to London, and its hypothecation to address Air Quality and or Congestion would be welcomed, as long as this does not reduce the overall level of transport related investment in the Capital at any time.

As a Local Authority we would wish to be fully consulted on arrangements for devolution and the proposed the use of any VED related income.

9. ***How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?***

The TfL predictions in van kilometre growth taken from their emerging sub regional transport plan (2015) show the 2001 -2031 growth London wide to be c24%. For the eastern sub region this is 31%, and for RBG 44%.

The expansion of freight consolidation centres, and consideration of night time servicing (as used in 2012 for the Olympics) are both options which help reduce peak time demand on the network in the short and medium term

In the longer term research and development in RBG/Digital Greenwich as part of the autonomous vehicle projects are seeking to rationalise and optimise freight movement with a pilot scheme based around University of Greenwich campus deliveries being piloted later this year. The future development of these schemes (beyond 2020) is to a great extent dependent on (post Brexit) Central Government (and industry partner) finance.

However there needs to be a greater focus on the contribution that internet shopping is making to the growth of local deliveries and the associated congestion. There is the sense that consumers can adjust their internet shopping habits and collection arrangements so as they are more focussed on the impact of vehicle movements on the local environment and less on personal convenience.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

The RBG has no evidence that an increase in mini-cabs is increasing congestion in outer London but anecdotally the use of mini-cabs appears to be increasing through-out London.

More research on this area is required to identify if the growth in mini-cab use is significant and is undermining the switch to the use of more sustainable transport modes in a city with a a 24/7 bus network and moving towards a night-tube.

The issue can only be addressed by ensuring that public transport (and to a lesser extent cycling and walking) increasingly provides an effective (almost quicker, safer, cheaper, cleaner, more accessible, more reliable) alternative to the use of mini-cabs for the proportion of mini-cab users that could be encouraged to shift to public transport.

GLA/TfL policies should continue to ensure that minicabs (& taxis) are cleaner than the 'average' private cars. There is also less requirement for parking spaces when a private vehicle driver leaves his/her car.

The management of 'dead mileage', cruising for fares and touting are all areas which need to be better addressed.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Car clubs have a significant role. The latest data from Carplus estimate that 10.5 private vehicles are replaced by a single car club vehicle.

The space freed up by mass take-up of car clubs would facilitate many more congestion-busting schemes (cycle segregation, freight provision, bus priority etc).

The Mayor and TfL could help boost the take up and profile of car clubs to reach the target of 1 million car club members in London by 2025 through locking in funding to pump prime Car Clubs in new locations and through simple interventions such a 'roundel' for car clubs would help generate this boost by clearly identifying spaces in a regionally recognised way.

There is a sense that the growth of "point-point" car clubs could have a positive impact on the overall growth of car clubs, car ownership levels and the reduction in non-essential journeys. Further research is needed to determine whether this would be the case. An increase use of point to point car club journeys as an convenient alternative to journeys that would

otherwise be made on foot, by bike or using public transport would be a retro-grade step in an otherwise positive growth area.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Greater efficiency in the provision of bas services could have a significant impact on the reduction of congestion.

Plans for route expansion utilising a more strategic (rather than the previously reactive) approach to the development of services is now being implemented by TfL in conjunction with the Royal Borough.

New residents in intensification areas should be provided with accessible and direct bus services to employment centres and/or transport hubs as the developments are occupied – otherwise they will are more likely to use transport modes that will contribute to congestion.

TfL have historically been reluctant to introduce limited stop services on key routes. This is likely to be discouraging modal switch along key corridors and adding to congestion. The impact of the introduction of limited stop services needs to be further explored.

Increased prioritisation of rapid public transport routes, including orbital and direct links between opportunity areas and transport hubs, especially in outer London, are required as a viable alternative to private vehicle use. These need to be linked to high quality bus priority measures to address journey reliability.

Submission provided by:

Tim Jackson (Assistant Director for Transportation).

Royal Borough of Greenwich

01.09.2016

Response to GLA Transport Committee Investigation into traffic congestion consultation from the Royal Borough of Greenwich Conservative Council Group

2nd September 2016

The Greenwich Conservative Council Group welcomes this opportunity to contribute to the GLA Transport Committee's Investigation into traffic congestion. We have included our responses to the consultation questions below. Questions on this response should be directed to Councillor Matt Clare, Transport Spokesperson, at [redacted]

Greenwich borough continues to see increased congestion and air pollution due to a number of factors including:

- Increases in commuting by car from further afield to take advantage of cheaper rail fares from stations in Zones 3 and 4Inadequate public transport with several large areas not served by rail, Tube or DLR at all (Shooters Hill, Thamesmead, Lee/Kidbrooke borders) and a lack of Tube or DLR in the south of the borough
- Significant population growth

With the A102 Blackwall tunnel southern approach, A2 Kidbrooke Elbow and the A20 at Fiveways the worst spots, Greenwich residents would be delighted to see reduced congestion.

Any steps to decrease congestion and pollution in Central London must avoid any knock on or overspill impact on outer London boroughs like Greenwich.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

The rush hour seems to have lengthened time wise. For example there are queues at Cliftons roundabout (A20/A205 junction) and for the Blackwall Tunnel from as early as 0600hrs.

The following junctions all regularly see queues of 10 mins wait or more in rush hour or on Saturdays:

- A20/A208 Court Road junction (Eltham/Mottingham)

- Avery Hill Road/Footscray Road/Southwood Road (New Eltham)
- Eltham High Street from Court Yard
- A2 exit to Falconwood/Eltham Heights
- Well Hall Road to Shooters Hill (northbound)
- A2 Blackheath and through Deptford

2. What are the key causes of these changes in congestion?

i. Increased rail fares and increased housing costs leading to more people choosing to drive part of their journey from e.g. Kent to take the train from a Zone 3 or 4 Station e.g. Lee, Kidbrooke, Eltham, Falconwood, New Eltham

ii. Poor train operator performance

Southern and Southeastern in particular have well publicised performance issues (delays, cancellations, overcrowding).

More rolling stock is needed urgently. Extensive infrastructure work such as London Bridge and the Thameslink programme will help but further detailed refinements are needed e.g. More standing room on older Networker (465 class) trains, additional platform end exits at busy stations such as Lewisham, review of whether so many trains need to stop at low usage stations such as St Johns.

The level of signal and points failures on Dartford lines is totally unacceptable. In the last week of August 2016 there have been 3 infrastructure failures causing lengthy delays at a time of reduced services due to the temporary Cannon Street closure.

iii. Poorly programmed signals at road junctions which do not reflect the relative volumes between routes passing through the junction or have unnecessary stages in the sequence.

- Avery Hill Road /Footscray Road/Southwood Road, Eltham SE9 where an upgrade of signals is needed to take better account of relative flows between junctions as they fluctuate (work is underway)

- Eltham High St/Well Hall Rd/Court Yard sees an unacceptable amount of traffic flow time lost causing significant tailbacks and pollution due to an unnecessary and ineffective 'pedestrians cross 4 way' period in the lights sequence

iv. Allowing more movements than a junction can cope with

- Avery Hill Road Footscray Road/Southwood Road junction also has a '5th leg' (2nd set of traffic lights at just 15m away) for New Eltham Station car park which adds further complexity sequencing for an estimated only 200 or so vehicle movements

per day into the station. (Perhaps left turn in/out only from the station should be trialled in consultation with local residents)

- The layout of the A20 Fiveways junction causes significant problems, despite recent improvements, and should be completely reviewed

- A20 at Mottingham - perhaps U-turns should be banned on the westbound carriageway as they prevent significant volumes of right turning traffic per sequence and cause tailbacks.

v. Utility works - On key junctions 7 day working with hours as long as are acceptable to local residents should be in place to minimise disruption to London's arteries.

3. What impact does congestion have on Londoners, the city's economy and its environment

Congestion is a blight for those who see time and money wasted in traffic jams. For local residents impacted by congestion the pollution and noise are totally unacceptable. Crucially, congestion is limiting economic growth and has a disproportionate impact on smaller businesses.

In South East London we are particularly affected by the practice of commuters commuting by car from Kent to local train stations, which adds no economic value whatsoever to the areas the cars are parked in. Indeed this practice is clearly detrimental through increased air pollution, the loss of resident parking and the knock on effect that more residents concrete or pave over their gardens as more off street parking is needed. Council and police resources are also taken up putting in controlled parking zones as well as dealing with traffic and parking incidents. London wide coordination (perhaps with the Home Counties) on car commuting/ commuter parking would be welcome.

4. What can London learn from other cities in its effort to reduce congestion?

i. Increased park and ride set ups near the M25/M11/M20/M1/A2/A13/A21 etc. with free parking and fast rush hour trains into London terminii.

The increased capacity at London Bridge and untangled tracks as well as cascaded rolling stock from Thameslink should hopefully allow for more fast trains from key stations near motorways such as Sevenoaks, Orpington, Dartford etc.

Perhaps special non stopping highly publicised rush hour services could be run with 'special timed train only' season tickets which may be lower priced.

ii. Promotional activity from railcos to get people out of their cars and into trains where capacity allows this.

We suggested that Southeastern railway contact regular commuters who have 'London terminals only' season tickets from commuter parking blackspots such as Falconwood but whose postcodes are e.g. 5 miles or more away and offer fixed time promotional fares from their home station.

The trains are running part empty from those stations anyway so there is little extra cost involved and more fare revenue may be earned ultimately by the traincos. Southeastern were not willing to explore this suggestion at this time citing reasons of 'fairness'. Perhaps it could be considered under the new franchisee or a condition of the new franchise for the Kent routes that there be a trial of such measures to encourage modal shift, depending upon how any split between London Overground and longer distances services works post 2018.

In the very short term to simply have much better signposting to key train stations back at the M25/M20/A2 etc. for example to get better use of e.g. Orpington, Dartford, Swanley etc. Stations would help

iii. Consideration should be given to London piloting the French style flashing amber left hand turn when traffic lights are red.

Drivers can proceed with caution in the same way that they would turn left avoiding oncoming traffic if there was no traffic light. This cuts queues down.

Culturally however there would need to be a shift in our driving. Trial junctions would need to be chosen carefully and careful consultation/communication made. Possibly the Highway Code would need amending or temporary localised exemptions put in place on this point. It may only be appropriate to trial this during off peak hours.

iv. Radically improved public transport

In the last 20 years Paris has built its 5th ‘Crossrail’, it's 14th Tube line (of which two lines are now driverless), 3 tram lines and extended 4 Tube lines. The Bakerloo Line extension in South East London and Crossrail 2 are essential.

Transport for London and the Mayor of London need to think radically, including giving serious consideration to a DLR extension to Eltham, using the Silvertown Tunnel, to correct decades of under-investment in public transport in our borough. A DLR extension to Eltham would significantly reduce road congestion.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

If the proposals to extend the ULEZ as far as the South Circular Road are enacted it may result in increased congestion and parking concentration in areas just outside – these effects should be carefully considered.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

They could make a significant contribution but need to reach critical mass in more areas. Many areas are not yet covered or are inadequately covered. Also culturally the shift needs to be encouraged by greater use of promoters (residents associations/developers/local associations). Perhaps employers (especially the public sector) could incentivise 'company car' employees to take a car allowance but use car clubs or that large employers host car club spaces.

It may be that a more radical approach is needed on the part of London government to accept that a ramp up of investment is needed with financial losses initially to get to that critical mass and cultural shift.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

In areas with poor rail or tube coverage Express bus routes should be strongly considered.

For example Greenwich Conservative Councillors have suggested that an Express bus route be in place from Mottingham/Eltham to Woolwich Crossrail station via Shooters Hill. Making just 6 stops (Mottingham Village, Mottingham station, Eltham Church, Eltham Station, Shooters Hill, Woolwich Crossrail) it would make Crossrail the fastest route to several key work destinations including Canary Wharf and Liverpool Street.

Without that bus people may drive to Woolwich Crossrail or continue to use trains which are full to capacity and unreliable.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

It is essential that both Crossrail 2 and the Bakerloo Line extension (preferably beyond Lewisham to give much needed additional rail capacity) are built as soon as possible – and that serious consideration is given to a DLR extension to Eltham

More cycle superhighways and segregated quietways are needed in poorly served areas. In South East London CS4 and CS5 need to be built without further delay.

An extension of the Cycle hire scheme into lower PTAL areas in Zones 2 and 3 such as The Old Kent Road, Canada Water, parts of Deptford and Greenwich. With 15,000 homes being built on Greenwich peninsula an extension there has a strong case.

The unacceptable rail gap around Thamesmead also needs to be closed by extending either the DLR from Woolwich Arsenal or the London Overground from Barking Riverside.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Yes – the Silvertown tunnel is needed to improve resilience in the network and reduce congestion, but we believe the scheme should be much more radical and include bringing the DLR to Eltham. A more free-flowing alternative to the Kidbrooke elbow on the A2 should be considered.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

In some places e.g. Lower Thames Street eastbound it has increased congestion but ultimately has led to much safer and faster cycling times thus encouraging modal shift towards cycling.

Investigation into Traffic Congestion in London
London Assembly Transport Committee

LB Hackney Consultation Response (September 2016)

General Questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?
   Motor traffic on main roads in Hackney declined by 17.6% between 2006 and 2015 http://www.dft.gov.uk/traffic-counts/area.php?region=London&la=Hackney. This trend has accompanied an increase in the proportion of households in Hackney without a car which rose from 56% to 65% over the 2001-2011 period. But a significant proportion of the traffic in Hackney originates from outside the borough and the Council has much less control over this. Congestion remains a problem and on weekdays there is continuous all day traffic congestion and delays in Shoreditch, Dalston, Hackney Central and the routes entering/leaving the borough to the east including Lea Bridge Road and Homerton Road and also along Seven Sisters Road in the north. The road network in Hackney experiences the greatest traffic congestion and delays in the PM peak period (16:00-19:00 hours). The Inter Peak period (10:00- 16:00 hours) has significant levels of traffic congestion and delays particularly in town centre areas. The AM peak has the lower levels of traffic congestion and delays than both the Inter Peak and PM periods but there are still significant delays in all Hackney town centres. There has been a rise in congestion due to construction and services leading to increased number of HGVs and light goods vehicles. The rise in the numbers of cyclists, while positive in reducing congestion over the network as a whole, is also resulting in congestion at pinch points where cycle infrastructure has outgrown demand. Hackney residents rely on buses and have high levels of bus services across the borough, but this is resulting in increasing bus-on-bus congestion at stops and junctions. This is also beginning to have a serious impact on bus performance and after several years of declining Excess Waiting Times, the latest figures from 2016 show these beginning to rise again.

2. What are the key causes of these changes in congestion?
   For traffic originating in Hackney the biggest driver on the supply of congestion has been declining levels of car ownership which is reflected in census data. This trend in turn is driven by spatial planning policies which encourage car free and heavily car capped residential developments and restricted parking at local destinations. Also important is managing the supply of on-street car parking through appropriately-priced resident and business permit schemes. Hackney also has a strong tradition of making the alternatives

to private car use such as cycling and walking; public transport and car-sharing more attractive. But as mentioned above, Hackney has less influence on traffic which originates from outside the borough. In addition there is evidence that there has been a decline in the travel demand management effect of the London Congestion Charge. This may all now be beginning to affect the levels of traffic in the borough and since 2013 there has been a levelling off in the long-term decline in traffic on Hackney's major roads. Certain types of vehicles are becoming increasingly prevalent such as private hire vehicles, delivery vehicles delivering goods ordered online and other light goods vehicles used by services.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Traffic congestion imposes costs on Londoners in terms of delays in journey times; the health effects of poor air quality, noise pollution, reduced physical activity levels, obesity, road traffic collisions, community severance and children's independent mobility.[1]

There is growing evidence that high levels of air pollution can cause damage to the airways and lungs, trigger asthma attacks, cause heart attacks, and lead to premature death for people who are already ill. Recent research by Kings College suggests that child exposure to air pollution reduces lung capacity permanently by up to ten percent. Long term exposure to air pollution (over many years) can also increase the risk of cancer. In Hackney, 82 deaths a year can be attributed to air pollution (fine particulate matter, PM 2.5), comprising 8.1 per cent of the causes of premature deaths in the borough.[2] The most vulnerable suffer the most harm from air pollution, especially those who live in deprived areas, live work or learn near busy roads, are more vulnerable because of their age or existing medical conditions.[3] There is also potential for pollution generated by congested road traffic to make a long-term contribution to land contamination in London.

One of the biggest threats to the health of Londoners is physical inactivity – which increases risk of premature death and development of a range of chronic health conditions. 55,000 Hackney adult residents are classed as inactive. Walking and cycling are a key means for people in London to meet their physical activity needs. Levels of walking and cycling are directly related to volume of motor traffic.[4] Hackney has one of the highest child obesity rates in the UK, with a quarter of reception year children either overweight or obese. Measures to reduce congestion and consequently motor traffic generated air pollution are likely to have a positive contribution to international efforts to reduce climate change.

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[1] TfL (2012) Roads Task Force Technical Note 20: what are the main health impacts of roads in London?

[2] Walton, H. et al (2015) Understanding the Health Impacts of Air Pollution in London. Analysis by King's College for Transport for London and Greater London Authority

[3] Royal College of Paediatrics and Child Health (2016) Every breath we take: the lifelong impact of air pollution

[4] TfL (2012) Roads Task Force Technical Note 20: what are the main health impacts of roads in London?

There is evidence to suggest that traffic congestion leads to more frequent traffic accidents although the severity of these accidents may be reduced due the lower speeds which are also caused by it. London is the UK's most congested city. Drivers spent more than 250 hours idling in traffic in 2013, which is double the UK average – and this is set to increase to 299 hours by 2030, equivalent to 40 working days a year. Congestion delays creates cost for businesses and is also associated with declines in journey time reliability. Congestion slows down buses and makes travel by bus less attractive.

4. What can London learn from other cities in its efforts to reduce congestion?

London could learn from aspects of **Copenhagen**'s parking management policies, where the city has consistently reduced the amount of available parking in the Central and inner city areas by 1% per year. This has enabled the city to reclaim space on public streets for public realm and sustainable transport initiatives. Such an approach, whilst generating no income, would tend to lessen congestion and reclaim the street from vehicles. This could easily be integrated with initiatives such as the ULEZ and LEZ. **Stockholm** has a congestion tax in its inner city areas which charges vehicles a variable amount throughout the day dependent on expected congestion levels varying from 11 Krona from 9.30 to 3pm to a maximum of 35 Krona at the height of the morning and evening peak. **Milan**, which has been affected by dangerous levels of pollution, has plans, based on a French pilot scheme, to pay commuters to cycle to work. The city is also looking to develop an app to track cyclists. The Finnish capital, **Helsinki**, has announced plans to transform its existing public transport network into a comprehensive, point-to-point 'mobility on demand' system by 2025 – one that, in theory, would be so good nobody would have any reason to own a car. Helsinki aims to go beyond conventional public transport by allowing people to purchase mobility in real time, straight from their smartphones. The hope is to give passengers a range of options cheap, flexible and well-coordinated so that they become competitive with private car ownership not merely on cost, but on convenience and ease of use. Subscribers would specify an origin and a destination, and perhaps a few preferences. The app would then function as both journey planner and universal payment platform. One pilot scheme involved an innovative minibus service called Kutsuplus which let riders specify their own desired pick-up points and destinations via smartphone; and when these requests are aggregated, and the app calculates an optimal route that most closely satisfies all of them. A number of European cities are going beyond congestion charging in their city centres to exclude private cars entirely. **Oslo**, which plans to ban car from the central by 2019, is one while **Dublin** has a €150m scheme which could come into operation as soon as 2017. **Milan** is also introducing a radical city centre pedestrianisation scheme. Since 2015 **Madrid** has been fining drivers of cars who don't either live in the central areas of the city or have a guaranteed parking space in an official car park. Closer to home London could seek to learn from its own lessons in successfully implementing the **London** Congestion Charge and also from **Nottingham** where a levy on parking at workplaces with 11 or more parking spaces was introduced in 2012 and is charged on 25,000 spaces. The annual proceeds of £9m being raised from this scheme have helped to fund extensions to Nottingham's new tram network and to support improvements to buses and trains.

Approaches to Tackling Congestion

Charging for Road Usage

TfL already operates the Congestion Charge scheme in central London, and pollution-based charges are in operation or will be introduced. Tolling of specific roads such as river crossings has been proposed. The Mayor also has the power to introduce a Workplace Parking Levy.

5. How effective is the Congestion Charge? How should the scheme be modified?

The London Congestion Charge was effective when first brought in but pricing has failed to keep pace with inflation and its effectiveness has declined over time. The introduction of the scheme led to an initial fall in congestion in the Congestion Charging zone of some 30 per cent. However while traffic volumes have been falling, traffic speeds have also been getting progressively slower, most likely due to interventions that have reduced the capacity of the road network. In recent years the trend toward slower traffic movements has ceased and although congestion in Central London is close to pre-charging levels, without the Congestion Charge the situation would be worse. It may be a good time to consider extending the Congestion Charge to cover a larger area of Inner London as well as raising the level of the charge. One obvious issue is where to draw the boundary of the zone.

6. To what extent would a usage-based road pricing regime help reduce congestion levels?

This is an idea which is worth considering now. It would make users of road space pay on a pro-rata basis instead of vehicles paying a one-off charge when they enter the zone and encourage mode switching. It could provide an opportunity for a renewed drive for freight consolidation on last-mile delivery making use of electric vehicles and cargo bikes, and therefore reducing traffic from use vehicles such as light goods vehicles making deliveries. It would be possible to vary the charge according to the congestion in a particular area and by time of day. Experience from Singapore, where a usage-based congestion charge has been in operation since 1998 suggests that such a scheme can be very effective in reducing traffic levels. It can also incentivise a more efficient use of road capacity in space and time involving peak spreading and car-pooling.

7. How might the Ultra-Low Emission Zone and Emissions Surcharge affect congestion levels?

The Ultra-Low Emission Zone could also contribute to tackling congestion through excluding high emission vehicles from Central and Inner London. However there is a danger that emissions and congestion could increase just outside the zone which would limit the overall benefit to London to 12%. One key point so far is that the terms of reference for the working group looking at ULEZ has not yet been revised to make reducing traffic levels and congestion an explicit objective of any scheme.

One idea might be to strengthen the wider area London Low Emission Zone. This could be done through applying the Euro 4 (for petrol) and Euro 6 (for diesel) emission thresholds of the currently proposed ULEZ to the current vehicle classes covered by the LEZ with a plan to eventually extend these thresholds to cover private cars. Strengthening the LEZ could be combined with an expansion of the London Congestion Zone so that it covers all of Inner London with the North and South Circular roads as the boundary. The current and planned congestion and emissions charging zones are summarised in the table below together with the four additional charging structures discussed in 6 and 7 above.

Current, Planned and Proposed Congestion and Emission Zones in London

Zone	Type	Date in Effect	Vehicles Affected	Boundaries and Timing	Charge	Notes
London Congestion Zone	Congestion	2003 onwards	100% discounts to registered cars which emit 75g/km or less of carbon dioxide and meet the Euro 5 standard, buses, coaches motorbikes and disabled drivers. 90% discount for registered residents.	Central London, weekdays between 7am and 6pm	£11.50	A Western extension of this zone was added in 2007 and removed in 2011
London Low Emission Zone (LEZ)	Emissions	2008 onwards	Larger vehicles such as HGVs, buses and some larger vans, 4x4 light utility vehicles and pick-ups: car drivers not affected	All areas within Greater London, those at Heathrow and some parts of the M1 and M4 are included. The M25 is not affected, 24 hours a day, seven days a week.	£100-£200	
“T-Charge”	Emissions	2017-2019/20	Pre-Euro 4 emissions standard petrol and diesels –	Central London, timings tbc	£10	

			those registered before January 2005			
Ultra Low Emission Zone (ULEZ)	Emissions	September 2020 Proposal to bring forward the state date to 2019	Pre-Euro 4 Petrol Cars. Pre-Euro 6 Diesel cars.	Initially (2019) Just Central London 24 hours a day, 7 days a week. Proposal to extend area to North and South Circular roads in 2020	£12.50	
Proposal 1 - Tightening the LEZ)	**Emissions**	**2020**	**All non-Euro 6/VI HGV's buses and coaches**	**Greater London**	**tbc**	
Proposal 2 - Tightening the LEZ (+ cars option)	**Emissions**	**2020 (or later)**	**All non-Euro 6/VI HGV's buses and coaches, all + non-Euro 4/IV petrol cars + non-Euro 6/VI diesel cars**	**Greater London**	**tbc**	
Proposal 3 - Expanded London Congestion Zone	**Congestion**	**tbc**	**tbc**	**North and South Circular**	**tbc**	
Proposal 4 – Usage Based Congestion Zone	**Congestion**	**tbc**	**tbc**	**tbc**	**tbc**	

8. What would be the benefits and drawbacks of these other interventions?

ULEZ Current Proposals

Pros

The North and South Circular roads would provide a clear and understandable boundary for the scheme - something TFL have said they require. This would amount to a 17-18 fold increase in the area and cover 3.8 Million people. The zone would cover private cars as well as commercial vehicles. The scheme would lead to a 30% improvement in air quality in Inner London and a 12% improvement London wide. The scheme would also probably lead to a reduction in congestion as some older vehicles would be deterred from driving in the zone.

Cons

A number of boroughs in south London and also elsewhere (Waltham Forest, Redbridge, etc) are bisected by the road boundary and this would leave some boroughs part in and part out of the scheme. This may effect support for such a scheme if it is based on this boundary, although the current Central London Congestion charge cuts through the middle of the London Borough of Westminster. Pollution taxes would likely only relieve congestion temporarily as in time the roads would fill up again with a cleaner generation of vehicles.

Tightening the LEZ

Pros
TFL's modelling suggests that this would lead to 27% less emissions in Inner London and a 25% impact London wide.
The LEZ is close to being entirely London wide – some relatively small expansions of the zone would see it become London-wide
The scheme by avoiding including private cars reduces the impact upon, the costs of implementation and the likely controversy involved in introducing the proposals from a political perspective. As with the ULEZ expansion to the outer ring road proposal the scheme would bring a co-benefit of reducing congestion and the area affected would be greater.
Cons
It may encounter opposition from some Outer London Boroughs who oppose the impact on vehicles out of principle. There is also the possibility that it could be considered draconian by some Outer London boroughs who have a lesser air quality problem than that experienced within Inner London and also lesser issues with congestion. As with the ULEZ expansion, however, any congestion relief experienced would most likely be temporary as the fleet gets progressively cleaner.

There will no doubt be complaints from the HGV operators and coach companies who will point to the fact that they have to make significant investments in their fleets at relatively short notice which cannot be covered readily by vehicle replacement strategies. HGV fleet companies have already expressed concern about the change in guidance brought in with the Safe Lorry Scheme and cannot be expected to adapt to continuously changing policies. There is also little information available about the availability of alternative vehicles over 3.5t as the HGV and coach industry is heavily geared to manufacturing diesel vehicles. This may result in a delay to the implementation of ULEZ expansion which would be detrimental to Inner London boroughs. We welcome the announcements from Central government on the availability of funding for low emission freight vehicles and ask that further guidance is given to transport operators to help them move towards low emission vehicles.

Tightening the LEZ (including cars)

Pros
The congestion relief brought about by such a scheme would be greater than that brought about by a tightened LEZ charging for larger vehicles only and would cover a greater area than an expanded ULEZ.
Cons
A scheme that includes private cars could prove politically controversial. Such an option could be resisted by a number of principally outer London Boroughs partly as congestion and air quality issues are less acute in outer London and public transport alternatives to car travel are less attractive.

Expanding the London Congestion Zone to the North and South Circular Roads

Pros
An appropriately charged and indexed scheme would expand the London Congestion Zone area and extend the benefits of reduced congestion in this zone to a wider area where public transport and active travel alternatives to car-based travel are relatively attractive. Unlike an emissions based zone, the congestion benefits would not decay over time. It could be combined with either an expanded ULEZ zone or a tightened LEZ zone.
Cons
A number of boroughs in south London and elsewhere (Waltham Forest, Redbridge, etc) are bisected by the road boundary and this would leave some boroughs partially in the scheme, which may affect support for such a scheme if it is based on this boundary.
Usage-based Congestion Charge

Pros
It would make users of road space on a pro-rata basis instead of vehicles paying a one-off charge when they enter the zone and encourage mode switching to more sustainable forms of transport. It would be effective in charging high use vehicles such as light goods vehicles making deliveries. It could provide an opportunity for a renewed drive for freight consolidation on last-mile delivery making use of electric vehicles and cargo bikes. It would be possible to vary the charge according to the congestion in a particular area and by time of day. It could make use of modern GPS tracking technology for a more sophisticated type of congestion charge. It could be applied over a variety of different areas with charges varied to respond to real-time information on congestion. It could be used to incentivise car-pooling and travel outside peak hours.

Cons

While the technology now exists, there are many aspects of this scheme which would need to be defined and there is a relative lack of international experience at how to design, consult and enforce such a scheme. There may be concerns over privacy invasion and data protection.

(a) Tolling for river crossings or other major infrastructure

Tolling for specific pieces of infrastructure such as East London river crossings can help Londoners enjoy the accessibility benefits of such new links and tackle congestion without inducing a lot of extra car traffic. The tolling structure should enable the efficient use of road capacity throughout the day and while at the same time strongly incentivising sustainable public transport and active travel over private car use. The tolls will need to be strongly indexed to prevent erosion over time created by increased incomes and increased demand brought about by higher population densities.

(b) Workplace Parking Levy

This is essentially a charge or tax levied on workplace car parking spaces and has been successfully operating in Nottingham for a number of years. The income from the scheme has been ring-fenced for sustainable transport improvements. Such a scheme could be introduced in London under GLA powers and could potentially raise significant sums of revenue for sustainable transport as well as being effective in reducing congestion and air pollution. The charge could use a zonal system with higher charges in central areas of London. The approach could also be combined with the ULEZ OR LEZ rollout in tandem. Funding is already available from TfL and boroughs for workplace cycling parking and training.

(c) Retail car parking charge

Reducing car trips to supermarkets could be another fruitful way of reducing traffic congestion in London. Revenue from supermarket car parking charges could be invested in efficient sustainable consolidated home delivery systems.

(d) Devolving Vehicle Excise Duty to London

The mayor is calling for a range of new powers as part of a new city deal on devolution and Brexit. One such power is to retain the income generated from VED by London drivers. Whilst again no real details of this approach are known, getting acceptance of this approach may be problematic as the Treasury would then lose the value of this income.

Measures to target specific types of vehicle

Heavy road users – like commercial delivery vehicles, minicabs or private cars – could be target with specific measures. There could also be efforts to reduce bus traffic.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

It is likely that a large part of the observed increase in delivery vehicles on London's roads can be explained by the rise of delivery of items purchased online sometimes resulting in multiple attempts to deliver to residential addresses when the recipient is not present to sign for goods. One idea, which might require legislation, would be to introduce an Internet Fulfilment tax to address the traffic congestion externalities of this type of distribution. The funds raised from this tax could be ring-fenced to encourage the use of freight consolidation centres using electric vehicles and cargo bikes as delivery vehicles. The introduction of such a system may need a planning policy intervention to allocate sites for local depots which could be targeted in areas of high congestion/air quality issues. These depots could be incentivised to run on a 'one delivery attempt, then arrange alternative' basis. Zones of usage-based road pricing could also provide a means of driving forward this distribution model.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Private hire vehicles increased by 12,500 (this equates to the highest relative growth rate among all vehicle types, at 7.68%) between 2012 and 2015. We believe that TfL has been collecting some data on congestion created by black cabs and we request that it should be shared with the boroughs and that an informed debate takes place to achieve a balance between the benefits and disbenefits of the service.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

There is a big opportunity to expand the use of car clubs as they are a strongly metered use of cars with a built-in incentive to use them in less congested inter peak periods. Car clubs are also associated with higher use of public transport and active travel both of which help combat congestion. The 2015/16 Carplus Annual Survey calculated that each car club car resulted in 10.5 private cars being removed from London's roads. A London-wide steer on the acceptability of one-way car clubs informed by London-based research (most existing studies are based on European cities) might be useful.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Despite a recent drop due to the effects of traffic congestion, demand for bus services has shown a steady increase as London's population has grown and the capital continues to experience a tourism boom. It must also be noted that due to fare differentials the bus is a cheaper mode of travel than rail, a factor particularly important to low wage earners, people on benefits etc. For these reasons the bus will continue to play an important role as a means of getting people across the capital and should be encouraged where possible through the extension of bus priority schemes. The opening of the Elizabeth line in 2018 will have some effect on

bus patronage, where bus routes are parallel to it and the Central Line. However this in itself should not justify blanket reductions to bus frequencies. This should be seen as an opportunity to provide feeder services in Outer London to serve the new stations. Within Hackney, where with the absence of any tube stations bus usage is high, we would expect to see increased frequencies on routes which penetrate residential areas. Congestion in the West End is a problem but it is where a number of bus passengers want to go. The loss or curtailment of direct bus services from Hackney to the West End will be resisted unless it can be shown that interchange and fare penalties can be minimised. The proposed 'bus hopper' one hour ticket will reduce the interchange financial penalty for curtailed West End-bound buses. However if buses are to be short-stopped then proper interchange with a seamless connection will be needed. Removal of buses from Oxford Street, for example, would make a bus station around Centrepoint at Tottenham Court Road an attractive measure as this would provide a direct interchange with rail and bus services. Reconsideration of the policy of shortening of bus routes leading to bus-on-bus congestion and unnecessary duplication in certain areas eg Oxford Street.

Encouraging modal shift

Greater use of more sustainable transport modes, particularly public transport, walking and cycling, would help address congestion.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?
Possible new initiatives could be introduced for parking, road pricing and by making alternatives to private car use more attractive. For example:

Parking

- Introduction of a 'workplace parking levy'
- Introduction of a 'supermarket parking levy'
- Tightening parking standards in the London Plan
- Extending the use of emissions-based parking tariffs

Road Pricing

- Usage-base road pricing
- Extension of the London Congestion Charge to North Circular
- Introducing zonal pricing measures to improve air quality

Making Alternatives Attractive

- Freezing public transport fares including Oyster card capping
- Make Oyster cards useable on London Cycle Hire scheme and in car club vehicles
- Speed up bus journeys on key corridors through introducing Express Routes
- A maintenance and increase in investment in cycle infrastructure
- Re-allocation of road space in favour of pedestrians and cyclists in residential areas through traffic calming; the promotion of Home-zones and filtered permeability.

Providing new road infrastructure

There are proposals for new road infrastructure in London, including river crossings and tunnels, which TfL has considered or is now actively pursuing. These include, for instance, the Silvertown Tunnel across the Thames in east London, and a tunnel from the A40 at Park Royal to the A12 at Hackney Wick

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?
Provision of better river crossings in East London. For example Gallions Reach Bridge and Silvertown Tunnel can help reducing queuing on approach roads while at the same time improving accessibility. New crossings need to be multi-modal to encourage sustainable and more road-space-efficient forms of transport. Cycling road infrastructure for example the new segregated cycle lanes as on the East-West Cycle Superhighway are valuable in addressing congestion in that they encourage modal shift towards cycling which make more efficient use of scarce and contested road space. But segregated cycle paths need careful consideration and are not suitable for all roads. We believe that the proposed tunnel from the A40 at Park Royal to the A12 at Hackney Wick, whilst worthy of investigation, is likely to be prohibitively costly.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?
There is strong evidence that new road links can induce trips onto the network meaning that any congestion relief provided by such roads can be short-lived. With the river crossings links mentioned above, there is a need to use tolls as travel demand management to prevent increase traffic. The tolls need to be set at a high enough level to deter new traffic and these tolls need to fully future-proofed to take account of population-related demand increases and inflation. WE are however keenly aware that Tolling of river crossings in East London would disadvantage East London residents in comparison to those in west of London

whose river crossings are not tolled. This is an issue that needs looking at and perhaps tolls should be introduced across all crossings?

16. How should new road infrastructure be funded?
The money raised by the tolls described in 15 above can be used to fund the new road infrastructure. The costs, which should incentivise low-emission vehicles, can then be met by users on a polluter pays principle. But it is perhaps unfair that only residents in East London should bear the cost of new infrastructure and the tolling of roads in West London could also be considered.

Maximising available road space

Space on London's roads is often restricted by construction work or other roadworks. TfL uses measures such as a lane rental scheme to manage this. In some cases, road space is diverted permanently for other key priorities such as cycling infrastructure or improved pedestrian space.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?
Although the aspiration to reduce road and street works is admirable, in practice it is very difficult to implement. The indeterminable nature of works does not allow a secure prediction for numbers of works to be achieved and the idea of placing a ceiling on this is not workable in real-time situations. The lane rental scheme has many good initiatives in seeking to reduce disruption on the strategic network, primarily by managing the timings of works and avoiding peak hours, however this does not immediately help the residents of any borough as this often shifts work-times to a point where contractors trying to increase the use of evening working. The timings of works on the TfL network are not always aligned with those of the roads of the adjacent authorities and therefore there are limited "gains/successes" in terms of reducing disruption. In order to have a more effective scheme there needs to be consideration to extend it onto the Boroughs Strategic Route Networks and ensure that those through-routes assist in ensuring an overall traffic flow improvement.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?
In some places the roadworks associated with implementing segregated cycle schemes have caused traffic congestion especially where the works are not coordinated with other road schemes. In the early days following implementation traffic can be displaced onto other roads even where there is a justifiable expectation that many car trips may be prevented in the medium-term through 'traffic evaporation'. In some cases such schemes are difficult to progress because residents do not believe in traffic evaporation. A stronger evidence base for traffic evaporation would be useful for the developers of cycle and pedestrian schemes.

Active traffic management

TfL uses technology to monitor and manage traffic, for instance altering traffic signals to respond to incidents causing congestion. It has also recently introduced a Road and Transport Enforcement team to provide an on-street response.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Advances in technology are creating increasing opportunities to manage traffic in real-time to minimise congestion. Anti-congestion measures, for example, could be built into usage-based road pricing. There are also technological gains being made by the managers of vehicle fleets. iBus is a useful tool to examine bus journey times at specific points and capture information on delays and disruptions. Bus speeds in Hackney are some of the lowest in London with routes 38, 55, 73 and 254 recording speeds of under 7mph in the peaks. Working in partnership with Bus Priority Teams within TfL Hackney is currently looking at opportunities to reduce delays identified on street through the iBus technology. However, it must be borne in mind that delays are sometimes caused by operators through poor scheduling and bus driver changeovers on street. Hackney is concerned at this problem which technology alone cannot cure. The Council is also concerned at slow bus speeds during certain times of the day (such as during school holidays) and would expect bus schedules to be optimised to reduce the impact of these delays which are frustrating for passengers. The Helsinki 'Mobility on demand' project combining journey planners and a payment system (discussed in in the response to question 4) is another good example of technology making the alternatives to private car use more attractive.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

The Enforcement Team uses a number of facilities to ensure effective management of congestion and in terms of reducing congestion seek to ensure that Section 74 of NRSWA 1991 is applied consistently to have all roadworks completed and cleared in a timely manner. They do have a large presence on the street and the numbers of "overrunning" works is kept to an absolute minimum.

London Assembly Transport Committee - investigation into congestion on London's roads

Response by the Royal Borough of Kingston upon Thames

General Questions

Q1.How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Response

Traffic surveys carried out by Royal Borough of Kingston (RBK) have shown that there was a general reduction in traffic flows during recession years, with a slight increase in traffic flows over recent years where there has been an economic upturn. Congestion across the borough has generally remained consistent over recent years with no significant increases in traffic congestion observed.

As Kingston town centre is a major shopping area there has been increases in traffic flow and congestion observed during Christmas periods compared to previous years.

Q2.What are the key causes of these changes in congestion?

Response

As stated above there has been an increase in congestion observed in Kingston town centre during Christmas shopping periods. This is likely to have been caused by an increase in the number of shoppers visiting Kingston town centre over the Christmas period during recent years of increased economic activity.

The Kingston Town Centre Movement Strategy highlighted traffic congestion on approach to Kingston Bridge as it's the only river crossing in the town centre. The borough appreciates that there are limited options to overcome this issue apart from a modal shift towards non-car modes of transport. The significant investment in cycling as part of the Go-Kingston project has the potential to create a significant modal shift towards cycling across the borough.

Q3.What impact does congestion have on Londoners, the city's economy and its environment?

Response

Congestion in London can create a significant impact to both the economy and environment. Town centre locations within the borough such as Kingston, Tolworth and Chessington are significantly impacted by congestion during peak periods.

These town centres are heavily dominated by vehicular traffic, which can create an unpleasant environment for pedestrians and cyclists. Peak time congestion in these town centre locations can also make it difficult to access these areas which can lead to an economic impact such as loss in trade of local businesses. There is also an economic cost created by increased journey times and unreliable journeys due to traffic congestion. During periods of high congestion such as during road works, the borough regularly receives complaints from nearby businesses regarding the impact of congestion to trade.

Emissions from motor vehicles are the largest contributor to air pollution within the borough and the areas of the borough where the poorest air quality occurs is almost wholly consistent with the areas which suffer from regular traffic congestion. The borough has identified the A3/ A240 junction in Tolworth and the Kingston gyratory as among the most significant air pollution hotspots and these are also areas of high traffic flow and congestion. Within these areas, the air quality objectives for both nitrogen dioxide and particulate matter are being exceeded. Exposure to poor air quality affects people's health and is linked to respiratory illnesses, cardiovascular disease, cancers and impaired cognitive development in children.

The residential accommodation closest to the busy, congested roads tends to be lower cost or social housing. For example affordable housing is generally located on lane with the lowest value land, which *usually in close proximity to busy roads and junctions. Therefore, the air pollution caused by traffic congestion disproportionately affects those on lower incomes who are often the most vulnerable.*

Q4.What can London learn from other cities in its effort to reduce congestion?

Response

The borough has been awarded significant funding for cycling infrastructure measures to create a cycling network within the borough that is on par with Dutch cities, which is currently being delivered as part of the Go Kingston project. The scheme involves a number of new cycling infrastructure schemes such as segregated cycling facilities and cycle priority at key junctions. An increased mode share to non-car modes of transport will enable growth within the borough without creating a significant impact to traffic congestion. Projects like Go-Kingston and future schemes such as Crossrail 2 have the potential to create a significant modal shift towards non-car modes of transport across the borough.

Copenhagen is another example of a city which has been successful at creating a significant mode share change from private cars to cycling. The city has implemented an extensive segregated cycle network which criss-crosses the city to ensure major origins and destinations are easily accessible by cycle. Currently in London segregated cycle facilities are limited with major origins and destinations not easily accessible by cycle. Copenhagen have also implemented hi-tech and innovative measures to encourage cycling such as cycle hire bicycles which have built-in sat nav systems to help cyclists navigate through the city. In many parts of London the layout of streets does not make it easy to navigate without prior knowledge of the road layout, therefore similar measures could be successful in London.

Copenhagen has been actively encouraging the use of cargo bikes to transport freight and even parents using cargo bikes to transport children to schools. London has seen significant increases in the number of LGV's over recent years due to an increase in shopping online. The increase of LGV traffic in London contributes towards congestion and air pollution. Many roads in the vicinity of schools in RBK and across London suffer from peak time congestion due to parents picking up and dropping off children by car, which can cause highway safety issues around schools. In recent years London has seen an increase of cargo bikes, especially in central London areas. The use of cargo bikes can be further encouraged across London by ensuring there are sufficient cargo bike parking facilities and where appropriate cargo bike facilities near schools.

The Norwegian city of Oslo is considering even greater steps to reduce congestion such as banning cars from central Oslo by 2019. The proposal is planned to improve the environment for pedestrians and cyclists in the city centre. The ban of cars will also be complemented by the provision of new cycle and bus facilities to improve non car accessibility into central Oslo. Norway already has one if the highest levels of electric car ownership; however they are also considering a ban on all petrol and diesel car sales by 2025. The ban of cars in the city centre and the ban of petrol and diesel cars are likely to significantly improve air quality in Oslo. As mentioned above London suffers from air quality issues caused by traffic and congestion. Similar measure to restrict vehicles (and high emission vehicles) could help to improve air quality in some parts of London where appropriate. However, any restriction on vehicles in London should ensure that traffic is not displaced, which could relocate the problem elsewhere.

Charging for road usage

TfL already operates the Congestion Charge scheme in central London, and pollution-based charges are in operation or will be introduced.1 Tolling of specific roads such as river crossings has been proposed. The Mayor also has the power to introduce a Workplace Parking Levy.

Q5. How effective is the Congestion Charge? How should this scheme be modified?

Response

RBK is not directly affected by the existing Congestion Charge zone. However, the borough is generally supportive of Congestion Charging in central London as it discourages car trips from the borough and neighbouring boroughs into central London, which helps reduce traffic and congestion within the borough.

RBK will object if there are future proposals to extend the Congestion Charge zone (and other road pricing mechanisms) to include outer London boroughs. In the case of RBK, road pricing of Kingston town centre would disadvantage Kingston compared to major town centres in Surrey such as Woking, Guildford and Epsom. If a road pricing scheme is proposed for outer London boroughs then it should also include major town centres in neighbouring Home Counties.

Money raised through Congestion Charging should also be made available to outer London boroughs to mitigate against congestion to ensure there is a balanced reduction in car use across the whole of London. Currently there is a large variation in car usage in inner London boroughs compared to outer London boroughs. To ensure car usage across the whole of London decreases there needs to be an investment in mitigation measures in outer London boroughs as well as inner London boroughs. Mitigation measures should focus on a shift towards sustainable modes of transport such as walking and cycling, and there should also be a focus on transport environmental mitigation measures to reduce air pollution caused by transport.

Q6. To what extent would a usage-based road pricing regime help reduce congestion?

Response

RBK is generally supportive of a usage-based road pricing regime in central London to discourage car trips from the borough into central London. The borough is not currently considering any usage-based road pricing regime for RBK.

As mentioned above RBK will object to any proposals to extend a usage based road pricing scheme to cover RBK. A usage based road pricing scheme will significantly impact major town centres such as Kingston, as it will disadvantage Kingston compared to other town centres in Surrey, which could cause a significant economic impact to the whole of the borough.

Q7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

Response

The introduction of the ULEZ and Emissions Surcharge is likely to further discourage car travel into central London, which in-turn is likely to reduce traffic flow and congestion across London. RBK are generally supportive for the proposed Ultra Low Emission Zone and Emissions Surcharge, however RBK are concerned that introduction of the ULEZ and Emissions Surcharge could lead to displacement traffic in boroughs outside of the charging zone, caused by vehicles re-routing their journeys to avoid the ULEZ.

The impacts of displaced traffic must carefully be considered with appropriate mitigation measures implemented in affected boroughs to reduce the impact of displaced traffic.

The ULEZ could also lead to a displacement of public transport trips in outer London boroughs as people who used to drive into central London alternate to public transport. Commuters from outside of London may also drive into outer London boroughs and carry on their final leg of their journey via public transport services.

Currently many parts of the public transport network in outer London boroughs are operating close or over capacity, therefore there needs to be increased investment in public transport services to accommodate any potential future increase in public transport demand caused by the ULEZ. There also needs to be investment to mitigate against any associated air, noise and environmental impacts caused by displaced traffic and public transport trips.

Measures to target specific types of vehicle

Heavy road users – like commercial delivery vehicles, minicabs or private cars – could be targeted with specific measures. There could also be efforts to reduce bus traffic.

Q9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Response
RBK are trying to reduce the impact of delivery vehicles by encouraging deliveries to be made outside of peak hours. The borough has limited powers to restrict delivery vehicles apart from applying conditions to planning applications which restrict delivery hours.

The borough will generally support measures implemented by the Mayor and TfL to reduce delivery vehicle traffic during peak periods. However, any restriction of delivery traffic during peak periods should consider the impact of off-peak deliveries have on neighbouring residential properties. In the future there are likely to be an increase in residential properties

in town centre locations, therefore off peak delivers (such as early morning or evening) may not be suitable.

The Mayor and TfL could also consider the use of freight consolidation centres, which can to reduce delivery vehicles across London by providing a hub where goods destined for the same locality become collated and then sent to their destination with fewer vehicle trips. Freight transport operators can choose to deliver their goods to these hubs as an alternative to accessing town centres in line with general time-slots. The hub then uses low-impact vehicles to cover the 'last mile'. This can improve the loading capacity efficiency and reduce the number of delivery trips in town centres. This can improve air quality and congestion caused by larger volumes of LGV and HGV trips.

The provision of hubs should be promoted at a strategic level in the London Plan, and boroughs identifying appropriate sites through the Local Plan process.

Q10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Response

RBK has observed an increase in mini-cab traffic in Kingston town centre during late night hours when pubs and clubs across the town centre shut. The borough manages mini cab traffic by agreeing specific locations across Kingston town centre where mini cabs can operate.

Mini cabs in the borough do not significantly contribute towards traffic congestion as the majority of mini cab traffic is outside of peak hours.

Q11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Response

Car clubs has the potential to reduce car ownership, which therefore reduces car use and overall congestion.

The borough expects demand for car clubs to increase in the future with new residential development in town centre locations having limited car parking provision (in accordance with London Plan parking standards). The borough is encouraging car clubs by ensuring new town centre residential development includes provisions for car clubs.

The mayor and TfL can further encourage car clubs by working with other London boroughs to ensure appropriate car club provision is provided across London. The Mayor and TfL can also work with other London boroughs to encourage the roll out of new technology so car clubs vehicles can be picked up and dropped off in different locations and across borough boundaries.

Q12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Response

Some parts of Kingston town centre experience congestion caused by the number of bus routes travelling the town centre (Eden Street). As well as creating an environment

dominated by buses there is also a highway safety concern with pedestrians and bus conflicts.

Due to the limited rail links serving Kingston town centre, buses form a vital link between the town centre and surrounding areas, therefore RBK understands the importance of local buses routes operating close to the town centre to ensure there is good accessibility to the town centre by bus.

RBK commissioned a Kingston Town Centre Bus Strategy which highlighted problems caused by existing bus services at the northern end of Kingston town centre. To overcome these issues the Kingston Town Centre Bus Strategy recommended a new bus station located at the edge of the down centre. There are on-going discussions with TfL to agree the re-routing of buses away from the town centre.

Encouraging modal shift

Greater use of more sustainable transport modes, particularly public transport, walking and cycling, would help address congestion.

Q13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Response

There are areas within the borough which suffer from poor public transport accessibility, especially in the south of the borough where PTAL scores are low and car mode share is generally high. Investment in public transport infrastructure such as Crossrail 2 has the potential to improve public transport accessibility, which will encourage a modal shift away from private car use.

There are locations across the borough where interchange between public transport services is poor, for example in Kingston town centre bus services are dispersed across the town centre, which can make the interchange between bus and rail confusing. Transport interchange between public transport services can be improved through consolidation of bus stop locations and improved connectivity between rail and bus services.

The borough are currently implementing the Go Kingston project which involves a significant investment in cycling infrastructure such as segregated cycle lanes. TfL can further encourage a modal shift to active travel modes by implementing schemes to reallocate road space to non-car modes of transport. Major junctions in the borough such as the Kingston town centre gyratory and the Tolworth A3/A240 junction create a barrier to walking and cycling. Reallocation of road space would make town centres more accessible and less severed from surrounding locations, therefore further encouraging a mode share towards active modes.

Providing new road infrastructure

There are proposals for new road infrastructure in London, including river crossings and tunnels, which TfL has considered or is now actively pursuing. These include, for instance,

the Silvertown Tunnel across the Thames in east London, and a tunnel from A40 at Park Royal to the A12 at Hackney Wick.

Q14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Response

The borough would support new road infrastructure if required to unlock future development rather than schemes which would simply increase capacity to accommodate existing demand. The borough is in the initial stages of promoting a new road scheme in the Chessington area to provide a link between the A243 and A3 to unlock potential housing and job opportunities across the south of the borough.

It is envisaged the scheme would form a package of measures, which includes schemes such as Crossrail 2 to improve public transport accessibility into London. The package of measures will support growth across the south of the borough and increase the viability and long term prospects for Chessington World of Adventure's to continue to grow and expand providing much needed employment and leisure opportunities in south west London whilst reducing its impact on adjacent communities.

The road scheme will relieve congestion issues along the length of the A243 corridor but in particular on the town centres of Chessington, Malden Rushet and Hook, which are currently dominated by vehicular traffic and suffer from severance caused by major roads dissecting these town centres.

The reduction in traffic travelling through the A243 corridor *will provide opportunities to improve accessibility of Chessington,* Malden Rushet and Hook *by active modes. There are also likely to be benefits in terms of air quality and highway safety in relation to a reduction of traffic flows through Chessington town centre.*

Q15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Response

As mentioned above new road schemes should only be considered for schemes which unlock future development potential whilst sustaining and enhancing established economic locations. The proposed road scheme in Chessington would form part a package of measures, which would include improvements to public transport and active mode accessibility of Chessington, Malden Rushet and Hook town centres, such as implementation of Crossrail 2 (in Chessington South) and a package of measures to reallocate road space on the A243 corridor to active modes and public transport.

Q16. How should new road infrastructure be funded?

Response

New road infrastructure schemes which unlock future development should be funded or part funded by developer contributions through funding mechanisms such as CIL or s106.

RBK will also be supportive of new and innovative ways to generate income to fund (or part fund) new road infrastructure, such as the ring fencing of business rates and stamp duty for local retention towards transport infrastructure.

Maximising available road space

Space on London's roads is often restricted by construction work or other roadworks. TfL uses measures such as a lane rental scheme to manage this. In some cases, road space is diverted permanently for other key priorities such as cycling infrastructure or improved pedestrian space.

Q17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

Response

The borough has noticed an improvement in the performance of utility companies since TfL has implemented schemes such as the lane rental scheme. Since introduction of these schemes road works have been completed in a shorter time periods and unnecessary disruption has been avoided.

These schemes can be made more effective through measures which financially penalise utility companies for unnecessary disruption caused by issues such as road works not being completed to agreed timescales.

Q18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

Response

The borough is not aware of any significant congestion issues caused by recent cycle and pedestrian improvements implemented as part of the borough's Go Kingston project. As these schemes are still new the borough will continue to monitor the situation.

Preliminary studies show that when cycle and pedestrian improvements are implemented they encourage a modal shift towards active modes. Any highway capacity reductions caused by these schemes are off-set against the modal shift away from car use; therefore overall there has not been a significant impact on congestion.

Active traffic management

TfL uses technology to monitor and manage traffic, for instance altering traffic signals to respond to incidents causing congestion. It has also recently introduced a Road and Transport Enforcement team to provide an on-street response.

Q19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Response

The widespread use of smart phone technology means there is greater potential for commuters to plan their journeys to avoid congestion on the transport network. The use of technology to manage congestion is also consistent with the borough's policy of better management of the existing transport network.

Technology to manage congestion is reliant on commuters being given live information of congestion on the transport network for all modes of transport. The technology can be

enhanced by ensuring live transport congestion information is available on a number of platforms such as smart phone apps, in car sat nav systems, real time bus information screens etc.

The iBus system has been successful at providing commuters with reliable journey information for bus services in London. It is also available on a variety of platforms (i.e smart phone apps and text messaging etc), which ensures the information is easily available to commuters. A similar multi-platform system could be introduced for other transport modes.

Q20. How effective has the Road and Transport Enforcement team been in tackling congestion?

Response

The Road and Transport Enforcement team have been effective at tackling congestion within RBK through measures such as yellow box enforcement, illegal parking and U-turn manoeuvres. The borough supports enforcement of the road network to manage congestion.

Lambeth

2 September 2016

Transport Committee: Investigation into traffic congestion in London

Dear Transport Committee Members

Thank you for providing an opportunity to respond to your call for evidence on congestion in London. As an inner-London borough, Lambeth understands the growing problems faced by Londoners due to exposure to poor air quality, and the risks to road safety from an ever increasingly congested High Street.

We would like specifically to respond to question 9 in your call for evidence.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Background

The INRIX traffic scorecard 2015 compared traffic worldwide in more than 100 cities. London ranked first with 101 hours wasted in traffic, this equates to more than four days. With our population set to grow to 10 million by 2031 this will continue to get worse. The cost of congestion to London's economy was estimated to be $8,513m in 2013, this is predicted to grow by 71% by 2030 http://inrix.com/wp-content/uploads/2015/08/Whitepaper_Cebr-Cost-of-Congestion.pdf .

Air quality in London continues to exceed the air quality objective limits set in the UK's Air Quality Strategy. The London Atmospheric Emissions Inventory 2013 (LAEI) shows twenty percent of NO_x emissions across London to be from vans and trucks. The London boroughs of Lambeth, Wandsworth, Southwark and Croydon are working together to tackle this problem directly. We would like to share details of this project with you to ask for help to encourage other boroughs and businesses across London to reconsider their purchasing processes so that deliveries are made as efficient as possible.

Low Emission Logistics

The Low Emission Logistics project has been funded by the second round of the Mayor's Air Quality Fund and aims to improve air quality by reducing the number of delivery vehicles travelling into each borough. The way we plan to achieve this is by reviewing the procurement and contract management processes in each borough to identify where the need for deliveries can be reduced.

Current contracts for commonly purchased supplies such as stationery and IT equipment allow for daily deliveries. Our data collection has shown that this can result in deliveries from the same carrier taking place to one building more than once a day, every day. The cost for this level of service is not clear within the pricing structure or contract agreement; in fact suppliers will often tell customers that delivery is free when really it is hidden within the cost of products.

Changing the contractual arrangements from having deliveries five days per week to just two days per week will reduce vehicle kms and associated emissions by sixty percent. Suppliers have argued

however that as they are still in the area delivering to other customers this makes very little difference to real congestion and air quality concentrations. We are working with our main suppliers to identify which other businesses in the area they also deliver to, so that we can encourage these businesses to work with us to create a real reduction in pollutant concentrations.

The highest volume of deliveries to each borough is for replacement toner cartridges. As with most modern offices the boroughs use a multi-functional device for their photocopying, printing and scanning needs. When the toner needs to be replaced, the unit will generate an email to a service centre and then a replacement product is ordered and delivered using a next day delivery service, again this results in daily deliveries. Discussions are ongoing with the ICT provider to change this process. If we place a bulk order for these supplies each month we can reduce delivery vehicles to each building from at least 20 per month to just one. It is assumed that all businesses in London operate these devices; if we can encourage all business to take this approach then the potential for reducing van movements is considerable.

By the end of year 1 for the project (March 2017) we will have produced a feasibility study into the set up and management of a consolidation centre. This is based on the operation currently used by Camden and Islington council in North London whereby all of their supplies are sent to the centre and then delivered to each building on just one vehicle. Once the report is published, the South London boroughs will decide if using a consolidation centre is appropriate. Ultimately the decision will be made on the financial feasibility of such a scheme. Logically, if we can help our suppliers to reduce their operating costs then we would expect this saving to be passed on to boroughs which could be re-invested in to the use of a centre. However, suppliers are very reluctant to pass these savings on. We believe that if we can create a critical mass of consumers that demand a more efficient delivery process then we will be in a stronger position to negotiate.

Behavioural change

Through engagement with council departments and businesses we have found there is very little awareness of the problem of congestion. Many business do not consider deliveries to be a problem in London at all, mainly because they order their supplies and they arrive with very little problem. There is no connection for them between their own behaviour and the wider issues faced by Londoners. In addition, suppliers offer an increased level of service such as one hour delivery etc. which simply increases congestion but is not really necessary. A communications programme focussed on behavioural change for consumers would help to educate and raise awareness of the overall problem. We can then help Londoners to make choices that will not increase congestion.

Other factors

The planning and development process has the ability to place restrictions on developers for when deliveries can be made. This is often through using a standard condition that requires submission of a delivery and servicing plan. In Lambeth applications are considered on their own merits; where an area is not considered to be noise sensitive then it might be considered that overnight deliveries may be permitted.

The London Lorry Control Scheme places restrictions on vehicles over 18t travelling through London after 9pm and before 7am. These timings have been in place for many years without revision; considering the changes that have been made to vehicle technologies to make them quieter and also the change in London's noise climate it is now appropriate to review this policy. This current restriction leads to a higher volume of small vans and trucks travelling through London when in some cases, if an appropriate route is used then a smaller number of larger vehicles could be used. Please note we are not in support of removing this control but to at least have an open discussion

with boroughs and the freight industry to review whether an improved policy could be implemented.

Over many years logistics plans for both construction and operations have implemented a “just in time” delivery schedule. The reasons cited for this have been due to lack of space on site or as being an efficient method of operation; in reality, many drivers will have to wait, often with their engines idling before they can make a delivery to site. This also creates the need for more frequent small deliveries. Developers should be encouraged to consolidate supplies and have less frequent deliveries; this has already been implemented successfully through the development planning process by the City of London for the 22 Bishopsgate development.

Finally, we welcome the road modernisation plan currently being implemented across London. We need to ensure that the re-design of roads considers accessibility for pedestrians to public transport hubs and allows for walking and cycling in low polluted spaces. In addition, the street design should incorporate convenient loading bays that will not case conflict with other roads users; perhaps changing priorities at different times of the day to allow commuters to cycle during rush hour and deliveries to be made outside of the peak times.

Yours sincerely

Cllr Jennifer Brathwaite
Cabinet Member for Environment and Transport

The Royal Borough of Kensington and Chelsea

Response to the London Assembly's Investigation into Traffic Congestion in London - 16 September 2016

Q1) How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

We do not collect or receive data on congestion in the borough and would certainly benefit from better intelligence on congestion on our roads. Transport for London and / or the Department for Transport should be able to provide useful information on congestion to the committee.

There is an increasing number of dynamic websites and apps such as the traffic function in Google Maps and Waze that provide some indication of real time traffic conditions. The Committee might consider the value of approaching technology companies to see how they can help boroughs better understand how the data is collected and how we could make better use of it.

We are experiencing increasing reports of "congestion" (which in some cases may be a simple term for "increased traffic flows") on some local streets where we have never experienced problems before, as drivers try to avoid hold-ups on the main road network using increasingly sophisticated dynamic sat nav systems.

We are also seeing more complaints of instances of traffic queuing back across pedestrian phases, particularly at necessarily wide traffic signal-controlled junctions, as congestion prevents drivers from clearing crossings on the exit side of the junction before the green man pedestrian phase commences.

Q2) What are the key causes of these changes in congestion?

Planned and emergency road works – the current, very well forewarned and managed gas mains replacement works on the Kings Road and major infrastructure projects such as the installation of cycle superhighways further afield have led to an increase in reports of congestion and related poor air quality across the borough.

Illegal kerbside activity and development-related traffic and on-street operations in such an intensely developed borough can very quickly lead to congestion on both the main road network and our quieter 'Local Streets'.

Permanent reallocation of road space such as has been seen on the cycle superhighway network will inevitably cause congestion on that remaining for vehicular traffic, in the absence of any mitigating measures or travel demand management.

Traffic signal faults and damage to carriageway detection equipment is often the cause of traffic build-ups and could sometimes be identified and addressed more quickly by TfL – we have had cases where it has taken a pattern of complaints from local residents to identify such technical faults.

An increase in the number of deliveries to households and work places resulting from the rise in shopping on-line. As noted below, it seems likely that the growth in popularity of app-based private hire is adding to congestion in some parts of London.

The cumulative effects of the above all add to increased congestion locally.

Q3 What impact does congestion have on Londoners, the city's economy and its environment?

Worsening air quality, lost productive hours, reduced quality of life, increased stress, perceived and real road safety problems e.g. traffic queuing back across pedestrian phases at traffic signals, a reluctance to walk / cycle in such hostile environments and redistribution of traffic onto smaller roads, leading to new complaints about noise and pollution.

Q4 What can London learn from other cities in its effort to reduce congestion?

We are not aware of any obvious schemes or policies from elsewhere that we could learn from.

Q5 How effective is the Congestion Charge? How should this scheme be modified?

TfL have published reports on the impacts of the Congestion Charge. As we sit outside the Congestion Charge Zone (CCZ) we don't have any of our own data on its effectiveness.

However, technology must have advanced since it was first introduced over ten years ago such that it would be easier to have a more traffic-sensitive scheme in place, which, for instance, takes account of changes in congestion by time of day and area. It could also perhaps be used as a tool to encourage cleaner vehicles.

Q6 To what extent would a usage-based road pricing regime help reduce congestion?

While there is some fairness in charging more according to distance travelled, and this might help with public acceptability of road user charging, it would not necessarily be fair or wise to charge more for a long journey on uncongested roads than for a shorter journey in heavy congestion.

Q7 How might the Ultra Low Emission Zone (ULEZ) and Emissions Surcharge affect congestion levels?

It would reduce the number of vehicles entering the CCZ, at least until ULEZ compliant vehicles become more widespread. It is not clear what impacts this might have on areas just outside the ULEZ/CCZ.

Q8 What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London

Tolling river crossing penalises those nearest to those crossings more than the rest of London. We would not therefore support the introduction of tolls on existing river crossings.

There is a limited amount of private workplace parking in the Royal Borough. Whilst a workplace parking levy would provide an incentive to put parking space to more efficient use but would be difficult to administer locally. The concept has been around for a number of years now yet only Nottingham has taken it up so far.

Devolving VED to London would enable the Mayor to give strong price signals to drivers in London to choose less polluting cars. Though there may be some perverse consequence, e.g. people living on one side of the M25 paying twice as much as someone on the other side.

Q9 How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Increase the number of parcel drop-off points (especially important in light of post office and delivery office closures).

Provide tools (apps/ websites) to help neighbours coordinate home deliveries (offering a cost saving on the delivery charge if this is used).

Identify locations for consolidation centres and provide incentives for boroughs to agree to hosting one.

Wider roll-out of 'quiet' night time servicing.

Encourage further use of the Thames and canals for moving freight.

Adopt successful demand management techniques previously used in reducing demand for passenger travel – raise public awareness of the congestion impacts of deliveries.

Q10 To what extent is an increase in minicabs contributing to traffic congestion and how could this issue be addressed?

We have no data on this so would need much better information on the apparent growth of minicab journeys and whether these are new trips from people switching modes from public transport / walking / cycling, or switching from taxis or private car. Anecdotally we have seen a rise in the number of minicabs on our streets since the recent rise in the popularity of app-based private hire enterprises. Interestingly we saw the number of casualties to taxi and private hire vehicle occupants double to 56 in 2015 from 27 in 2014 – an increase of over 100 per cent.

Q11 What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

There are plenty of studies to show that car clubs can provide the mobility offered by private car ownership without the initial heavy financial outlay. The marginal costs are sufficient to make members think before booking vehicles for short or non-essential trips. So car clubs do have a role to play in reducing both car ownership and car use.

The car club market in the Royal Borough peaked a couple of years ago and has now seemed to stabilise so we are seeing little demand for additional spaces. This is likely to continue unless there are new incentives to persuade more residents to give up their private cars. Replacing petrol and diesel powered car club vehicles with ultra low emission models would help improve air quality.

The widespread introduction of point-to-point car club schemes is a cause for concern as they may add to congestion by encouraging people to make car trips rather than using public transport or active modes.

Q12 To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Better use needs to be made of existing buses, ie improved reliability and journey times, but of course achieving this requires less congestion. While some observers believe that an over-supply of buses causes unnecessary congestion, we do not usually have access to information about passenger loading on buses, so we are unable to comment on whether there are opportunities to reduce bus provision while still meeting passenger demand. Anecdotal evidence suggests there is scope for many short bus trips to be made on foot, but too many bus passengers have no incentive or encouragement to switch to walking.

Q13 How can TfL further encourage a shift from private car use to public transport or active travel modes?

Physical infrastructure improvements such as more signalised pedestrian crossings where they are currently absent would encourage walking, but in

most cases in the Royal Borough they are missing largely because modelling shows they would cause more traffic congestion.

We believe there are opportuntities to harness technology to encourage significant shift from short bus trips to walking. Any reduction in demand for bus passenger trips will at least help reduce the need for *additional* buses, even if there is limited scope to reduce from current numbers.

Q14 Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Improved public transport and walking / cycling infrastructure to encourage fewer trips by private vehicles.

The Council supports a new walking and cycling bridge over the Thames between Battersea and Imperial Wharf.

Q15 To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

There is no real scope for significant new road infrastructure in the Royal Borough.

Q16 How should new road infrastructure be funded?

We have no strong views on this in general terms, but there will be a number of funding options according to local circumstances.

Q17 How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

TFL should be able to provide evidence to the Committee. From our experience of working with TfL to manage works on the Transport for London Road Network (TLRN), the scheme has had a knock-on effect in reducing disruption. We have seen a definite change in works promoters' behaviour since the introduction of lane rental scheme on the TLRN. Better planning and encouraging utility companies and highway authorities to work even more closely together to coordinate works would help reduce roadworks related congestion.

Q18 What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

Once again we have no real data on this. TfL modelling forecast large increases in journey times on key routes in the borough as a result of the Roads Modernisation Programme works, and we have noticed an increase in complaints about congestion from across the borough in the past few months.

Q19 How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Traffic signal technology is becoming increasingly sophisticated and we are seeing the use of new techniques such as active traffic management to help relieve congested junctions. Even wider deployment of dynamic traffic signal optimisation / UTC systems such as SCOOT could also help relieve congestion at particularly busy and complex junctions such as Scotch Corner in Knightsbridge.

Q20 How effective has the Road and Transport Enforcement team been in tackling congestion?

We have not yet noticed any real improvements in the Royal Borough.

Q21 Other comments

As noted earlier, London boroughs typically have fairly poor information available to them on the levels of congestion on their networks. It is hoped that new technologies that capture real-time data on congestion could improve this situation.

London Borough of
Redbridge

Transportation

Civic Pride

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Please ask for : Donald Chalker
Direct line : [redacted]
[redacted]

Georgina Wells
London Assembly
City Hall
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London
SE1 2AA

Our ref :
Your ref :
Date : 9 September 2016

Dear Georgina,

RE: London Assembly investigation into traffic congestion in London

I understand that an extension to the response deadline for the investigation has been granted to London Councils.

Please note that this response from L.B. Redbridge reflects Officer views only.

The views expressed by London Councils in their replies to Q3, Q5, Q6, Q10, Q11, Q12, Q13, Q14, Q15, Q16, Q17, Q18, Q19, Q20 in their separate response to this consultation are broadly endorsed by L.B. Redbridge Officers. The comments below are either amplification to those replies or responses to the remaining questions.

Q1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?, and
Q2. What are the key causes of these changes in congestion?

Whilst L.B. Redbridge monitors traffic flow levels, it does not have an evidence base which monitors congestion levels.

Q4. What can London learn from other cities in its effort to reduce congestion?

Careful attention should be paid to previous outcomes and emerging outcomes from relevant EU projects and publications and from advice of the London European Partnership for Transport (LEPT).

Q7. How might the Ultra-Low Emission Zone (ULEZ) and Emissions Surcharge affect congestion levels?

L.B. Redbridge is concerned about the potential for increased congestion around the North Circular Road should this become an ULEZ boundary and about the lack of substantive data indicating the potential extent of this.

Q8. What would be the benefits and drawbacks of these other interventions?
- Tolling for river crossings or other major infrastructure

Tolling is an acceptable way of funding new infrastructure. L.B. Redbridge would prefer the revenue raised to be allocated to significant transport investment in the sub-regional area concerned. London-wide congestion / LEZ / ULEZ policies should be used long term alongside other interventions to manage traffic levels in London.

Q9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

The first lesson in Transport studies is that transport is a derived demand. Given that the number of delivery vehicles on London's roads is a direct reflection of the capital city's economic activity; this is not necessarily the right question to ask. A more pertinent question is how can local authorities assist with improving the efficiency of delivery and servicing, including in congested locations or at congested times.

L.B. Redbridge believes that the Mayor and TfL working with London Councils should promote a statutory framework for deliveries, along the lines of the Dutch PIEK certification scheme. This will provide the incentive to the freight industry and quiet equipment manufacturers to retime deliveries out of peak times.

Q13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Open sourcing of all transport and travel related information to enable IT / App development is a key action for TfL and the Boroughs.

Q19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Open sourcing this information will enable the private sector to develop standalone solutions or integrate this information with their own transport planning activity.

Boroughs and TfL need to understand how they can influence the Mobility as a Service (MaaS) solutions that are being developed.

I trust that you find the L.B. Redbridge response a useful contribution towards the Committee's investigation.

We look forward to reviewing the Committee's report on this very important issue.

Yours sincerely,

D.A. Chalker

Donald Chalker
Team Manager – Transportation Strategy

London Assembly: Investigation into traffic congestion in London

Response from the London Borough of Richmond upon Thames

Executive Summary

Traffic congestion has increased in Richmond since the end of the recession, caused mainly by an increase in the capital's population, an increasing number of Light Goods Vehicles making deliveries and an increase in the school run. Richmond's population is ageing, meaning that an increasing number of car journeys are being made off-peak; peak congestion is growing, but not as quickly as elsewhere in outer London. However, congestion brings particular challenges to Richmond in the form of pollution, with the whole borough designated as an Air Quality Management Area. For example, the A205 South Circular Road passes through the centre of a number of villages and residential neighbourhoods in the borough, having an undesirable effect on residents and to the local environment. Being an outer London borough, we do not support forms of road charging or parking levies; these would simply send businesses in west London away into nearby counties which do not levy such charges. Instead, the Mayor and TfL should continue to promote measures to encourage the use of public transport, walking, cycling, car clubs and innovative ways of reducing delivery traffic. These should be complemented by effective and enforced travel plans for both new developments and for existing organisations that can be incentivised into such measures. Finally, TfL must continue to press for road works to be carried out in innovative ways that minimise the impact on and delay to traffic flow.

General questions

1. *How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?*

Traffic congestion has grown in London since the 2009-10 recession, worsening across the city – including the Borough of Richmond-upon-Thames. TfL's latest Travel in London report illustrates how traffic congestion has increased since the recession, including in outer London, throughout each weekday but particularly during the peak hours: the difference in average speed between the peak and off peak is now substantially larger than it was during the recession.[1]

On weekdays in Richmond, congestion builds as the outer-west London peak traffic period begins, again serving the growing local economy. This congestion is exacerbated by a substantial school run. During this period, peak-time deliveries begin; this causes further congestion when vans and Light Goods Vehicles (LGVs) stop on busy roads to drop off goods.

Deliveries and Internet shopping drop-offs continue throughout the day across the Borough; LGVs have grown substantially in outer London since 2010. A longer evening peak period begins around 15.30, as the evening school-run begins, before weekday congestion falls away from 19.30.

Congestion is also growing in Richmond-upon-Thames during weekends, in particular on Saturday and Sunday afternoon, during shopping hours and into Sunday evening. Finally, in Richmond, there is congestion across the Borough following matches or events at the Twickenham stadium.

[1] Travel in London report 8 figure 4.5, Transport for London, 2016

This congestion pattern is on the surface much the same as elsewhere in outer London. However, the Department for Transport data (shown in the graph below) suggests that Richmond's peak congestion has not worsened since February 2014, which suggests that drivers in boroughs such as Richmond have different requirements.

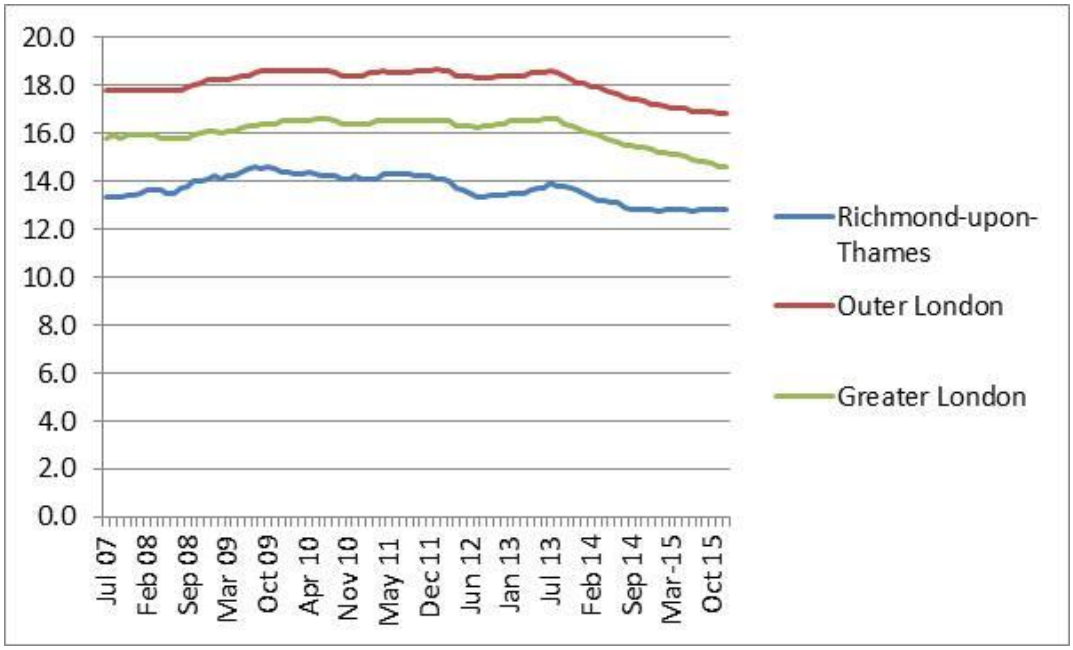

Figure 1: Average speeds (mph) during the weekday morning peak on locally-managed A-roads[2]

2. *What are the key causes of these changes in congestion?*

There is a combination of causes of change in Richmond, including:

i) Demographic: growing off-peak travel from retired drivers

- London's population has been growing since the 1990s. Between the 2001 Census and the 2011 Census, London's population grew by 14%. Growth was slower in outer London than the city overall, with the population increasing by 12%. Richmond's population grew by 9%.
- The last decade has seen the retirement of the first generation of workers in the UK that saw driving as a daily event. Many will continue to drive during the week, albeit during the off-peak, so contributing to a change in congestion patterns. Richmond has a growing number of retired residents and it is notable how average speeds during the morning peak have fallen less rapidly in the Borough than in other areas of London.

ii) Socio-economic: a growing school run and congestion from LGVs

- The economy began to grow following the 2009-10 recession, while the price of petrol and diesel has fallen since 2014, making driving less expensive. However, in London, working from home is now broadly equivalent in scale to annual leave as a reason why those in full-time employment do not make a commuting trip on any given day, contributing to limiting growth in peak-time congestion.[3]

[2] Source: Flow-weighted vehicle speeds on locally-managed A-roads data set, Department for Transport, 2015
[3] http://content.tfl.gov.uk/travel-in-london-report-8.pdf, page 18

- Richmond has continued to become an economy focused on services and high-value manufacturing. As a result, there has been a growth in LGV mileage, as services require deliveries, maintenance and improvement work, while much high-value manufacturing is delivered via LGV. LGVs also enjoy lighter regulation than HGVs and suit the 'last-minute' delivery habits of business.
- A proportion of residents have become wealthier, while goods and services have become less expensive. This means that more shopping, on-line retail, building and other improvement work gets commissioned, meaning a further growth in LGV mileage to service this.
- A desire by all Governments to expand choice in education has resulted in a larger school run, as an increased number of parents choose to drive their children to schools several miles away. The school run has become a major cause of congestion.

iii) Heathrow Airport

Heathrow Airport has grown as a contributor to congestion in the Borough; although it has now reached capacity in terms of aircraft movements, larger aircraft means that passenger and goods traffic may still increase.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Congestion frustrates Londoners and visitors to London and adversely impacts on the quality of life in the city. London's workers have to budget more time to travel to work and have less social time because of the length of journey home. Freight takes longer to travel between destinations and companies can make fewer deliveries or carry out fewer assignments.

Stationary or slow-moving vehicles have a negative impact on the towns and living spaces in the city. Traffic congestion on the major roads through Richmond brings pollution to town centres and residential areas. The whole of Richmond was declared an Air Quality Management Area for NO2 and PM10 in 2000, and Richmond and Twickenham town centres are both Air Quality Focus Areas as defined by TfL. Transport accounts for 25% of all CO2 emissions in the borough; of this, road transport emissions account for 97% of the transport CO2 produced.

4. What can London learn from other cities in its efforts to reduce congestion?

There is no one city-wide strategy that can be adopted to reduce congestion and its impacts. Richmond has reviewed lessons from other cities, as well as other boroughs in London, to identify what locally-relevant strategies could be adopted. These are broken down into themes below:

i) Reducing congestion from the volume of people making car-based journeys by making the alternative more attractive and/or less expensive

- Promoting walking and cycling as an attractive option for shorter journeys. Richmond has been successful in this, with 7% of residents in the Borough making bicycle journeys to work.
- Promoting the use of public transport, promoting innovation such as bus stop e-information systems and making interchanging safer and more attractive.
- Encouraging people to change the time they travel to and from work and encourage more businesses to allow employees to work from home.

- Encouraging the use of car clubs. Studies show that using a car club (rather than use a personal car parked outside the home) encourages people to consider whether they need to drive for their journey and is a less expensive way of having access to a car for occasional journeys compared to owning and maintaining a personal car. This has resulted in some car club members giving up their car.
- Investigating innovative ways to make lift-sharing part of the daily transport choice where walking, cycling and public transport are not options. This includes for orbital journeys, colleagues travelling to work and the school run. Six out of ten cars contributing to congestion are carrying the driver alone[4]; if some of these drivers chose to travel together, this would reduce congestion as well as allowing people to save fuel costs.

ii) Reducing congestion from the growth in LGV mileage

- Working with businesses to develop off-peak delivery and servicing plans for town centres and identifying incentives for businesses to adopt electric LGVs, to make driving to make evening deliveries less noisy.
- Working with residents and businesses to encourage the use of 'click and collect' rather than home delivery of internet purchases.
- Promote the use of cycles and powered cycles where appropriate for carrying goods and deliveries.
- Support the development of crowdsourced delivery, where travellers are paid to deliver items to people along their route, and support the app software companies enabling it.
- Where appropriate, new technology such as using automatic vehicles (able to use less road-space) and drones for deliveries may in future contribute to a limited extent to congestion reduction in London. In Richmond, given the presence of low-flying aircraft, usage of drones may not be appropriate in most of the borough.

Charging for road usage

5. *How effective is the Congestion Charge?*

The Congestion Charge has been broadly successful in its current Congestion Charging Zone (CCZ) in central London, an area with excellent access by public transport, which is geared-up to facilitate the radial journeys into London that are made by travellers into the CCZ. The lower level of traffic as a result of the CCZ, compared to elsewhere in London, has enabled a number of pedestrian and urban realm schemes to go ahead in central London, which may not otherwise have been possible. This has reduced the amount of road-space. Combined with the high level of construction works taking place, this has meant that traffic speeds have not increased, despite the lower level of traffic in the CCZ.

6. *To what extent would a usage-based road-pricing regime help reduce congestion?*

Such a measure would not be supported in Richmond. Creating a usage-based road pricing regime in outer London would encourage businesses to move or settle in adjacent areas outside of London, such as the counties to the west, where there would be no such regime.

[4] http://content.tfl.gov.uk/technical-note-14-who-travels-by-car-in-london.pdf

7. *How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?*

These measures are likely to worsen local congestion levels in Richmond if the A205 South Circular Road is chosen to act as the Ultra Low Emission Zone boundary. This would divide the Borough in two, including bisecting several villages such as Kew and Sheen, as drivers with vehicles not meeting the criteria remain on the South Circular Road or take alternative routes outside the new ULEZ.

The ULEZ and Emissions Surcharge measures are unlikely to have a significant impact on congestion in London as a whole, unless drivers cannot afford to upgrade their vehicles to enter the Zone. Indeed, the Department for Transport identifies a national switch by drivers to vehicles running with low emission fuels – which are less expensive fuels than petrol or diesel - as one of the reasons it forecasts an increase in traffic in England up to 2040.[5]

8. *What would the benefits and drawbacks be of these other interventions?*

- *Workplace Parking Levy*

As with the Congestion Charge, this may be a feasible intervention in a central location. However, this would not be suitable for outer London, because of the lower PTAL levels. Furthermore, a Workplace Parking Levy on businesses in outer-west London may encourage businesses to move or settle in adjacent locations such as the counties to the west, where there would be no levy.

Measures to target specific types of vehicle

9. *How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?*

Reducing the level of delivery vehicles on London's roads, especially at peak times, is key to reducing congestion on London's roads as well as to improving air quality.

The Mayor and TfL can support the Boroughs in working with Business Improvement Districts to develop town or area Delivery and Servicing Plans, which encourage deliveries and servicing to be undertaken off-peak or, where locally supported, during the evening or overnight. The Mayor and TfL can support the Boroughs in encouraging firms to obtain electric vehicles for this purpose: the much quieter nature of electric vehicles may reduce local objections to night-time deliveries.

The Mayor and TfL can also support the growth of 'Click and Collect' locations for goods bought online, including rolling-out the establishment of locations in stations and interchanges. TfL should work with other rail operators to ensure that as many stations as possible have this facility. Some operators such as Sainsbury's and Ocado already highlight 'eco-delivery slots' on their website, when deliveries are already planned in the area. Other retailers could be encouraged to adopt this practice.

Finally, the Mayor and TfL should support the development of crowdsourced delivery: pairing a parcel with a traveller who is already heading in the same direction. There are a growing number of technology start-ups – such as Delivery Folk and Nimber - offering such a service, by which the traveller receives a fee or other incentive for delivering a parcel. This crowdsourced approach –

[5] Department for Transport, Road Traffic Forecasts 2015, page 24

models of which are also being tested by DHL in Sweden and Amazon in the USA - may play an increasingly important role in delivery and offer an alternative to some LGV journeys.

10. *To what extent is an increase in minicabs contributing to an increase in traffic congestion, and how could this issue be addressed?*

The increase in minicabs and its relationship to traffic congestion is complex. The number of minicabs operating in London has increased substantially. Although an increase in the number of minicabs using the roads ostensibly seems related to an increase in London-wide congestion, the only analysis available – based on an analysis of Uber trips in the Congestion Charge Zone - contests this. It highlights data showing 68% of minicab travel taking place from 6pm until 7am, whereas congestion is worst in the CCZ between 8am and 7pm.[6]

Minicabs also enable journeys not easily undertaken by public transport. This is appreciated by older and disabled residents in London.[7] Such trips would not otherwise be made and the resultant benefits to the increasing number of older residents in London and to the economy may not be realised.

However, if there is concern about the growth of minicabs, supporting the development of business-led apps and services that enable minicab-sharing or taxi-sharing may be an effective way of controlling the growth of minicabs, while having the added benefit of achieving a form of lift-sharing. Given the importance of the night-time travel market to the minicab trade, the introduction of the Night Tube service may also limit the growth of minicabs.

11. *What contribution can car clubs make to tackling congestion and how can the Mayor and TfL encourage these?*

Car clubs can make a significant contribution to tackling congestion, especially reducing the number of short-distance journeys made by car. A number of studies suggest that if drivers have to walk a short distance to find a car – rather than get into a car outside their front door – they will consider whether it is easier to walk their whole journey. Research for ZipCar in the USA suggested that among business users, twenty percent of ZipCar members reported that they sold a personally-owned car after becoming a member, and another twenty percent avoided buying a car as a result of joining Zipcar through an employer-sponsored account.[8] Car clubs are also useful for firms wishing to send employees on visits from the office, as their employees can travel to work by sustainable transport and use a shared car for site visits, rather than their being a fleet of individual company cars.

Establishing travel habits among residents of new developments or among people newly arriving in an area is much easier than among residents with established travel habits. The Mayor and TfL must work with the Boroughs to ensure new developers provide travel plans as required, to promote the use of sustainable transport from the day of opening, including the provision of car clubs, and to monitor the performance of the travel plans to ensure their success.

[6] London Congestion Trends, INRIX, 2016, page 24
[7] Mode choice of older and disabled people: a case study of shopping trips in London, Schmucker, Quddus, Noland. Bell, Centre for Transport Studies, Imperial College London, February 2006
[8] http://www.zipcar.com/press/releases/z4breducescarownership

12. *To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?*

Providing an attractive bus network with relevant connections is an essential part of a package of measures to reduce congestion. A double-decker bus can carry up to 90 people, while a single-decker bus can carry up to 60 people, significantly more than the capacity of a private car. Improving the speed and reliability of bus services is a proven way of persuading people to make journeys by bus instead of by car, while reducing the number of buses needed to operate the route. The introduction of bus priority schemes is not always appropriate and needs to be considered on a case-by-case basis, but routes that do receive this capital investment become more efficient to operate and can be more attractive to car drivers considering other means of travel. Ensuring that passengers have as much information as possible about their journey, including when their bus is due to arrive, is an important way of reassuring passengers and making bus services more attractive. TfL should continue to develop its Countdown system, providing information to smartphone apps and via other channels.

Encouraging modal shift

13. *How can TfL further encourage a shift from private car use to public transport or active travel modes?*

TfL can provide more investment in addition to LIP funding for programmes proven to reduce congestion. This includes:

- Continuing to make cycling more attractive, for example by expanding cycle safety programmes
- Improving the capacity, quality and attractiveness of cycle hubs at stations and interchanges – for example Richmond and Twickenham - working with the train companies.
- Make it compulsory for all medium and large businesses to have a robust workplace travel plan focused on reducing the number of peak car journeys made to the site.
- School travel plans must be produced that are effective and have incentives to meet targets for sustainable travel: children and students should be encouraged to walk and cycle to school.
- Ensuring that major events – for example Hampton Court Flower Show and Twickenham rugby – are held with detailed travel plans and sustainable transport measures ready, building on the lessons learned during the 2012 Olympics.
- Awards and recognition provided for companies, towns, schools and BIDs with the most successful travel plans and sustainable transport policies.

Providing new road infrastructure

14. *Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?*

Well-planned road infrastructure placed in strategic locations can help reduce traffic congestion successfully. For example, Richmond and TfL have been considering improvements to the A306/A205 junction at Chalker's Corner. This scheme aims to reduce current and future congestion at the junction, while making the junction more attractive for pedestrians and cyclists to use. Looking ahead to the development of the Stag Brewery site on Lower Mortlake Road and the effect upon Chalker's Corner is a good example of planning good infrastructure to reduce traffic congestion.

15. *To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?*

New roads provide more capacity for people to drive and can make doing so more attractive. Many journeys to, from and within outer London are not easily made without a car. For developers, a high level of capacity and connectivity by roads is considered important for ensuring residential and business developments in outer London are attractive. However, building new roads does carry the risk of releasing residual demand for car journeys on the network. The increased level of traffic as a result of the new or upgraded roads then causes congestion on the existing roads linking with the new infrastructure. Finally, this puts pressure on the constrained supply for parking in the local towns as they become more accessible by car.

When constructing new roads, provision for segregated cycle routes and high quality footways should be provided, as well as bus lanes where appropriate. Bus lanes under development for use for relatively low-frequency routes – mainly in outer London - could be considered for use as High Occupancy Vehicle lanes, to encourage lift-sharing. Ensuring some allocation of new road-space to give priority for these more sustainable modes would highlight the alternatives available to drivers and may reduce the risk of any new road schemes creating more congestion. Finally, the risk of congestion on roads to towns can be controlled by a strategic approach to parking controls at destinations for the new traffic.

16. *How should new road infrastructure be funded?*

Major new road infrastructure schemes will need to be funded by TfL. For schemes that are demonstrably needed to mitigate for congestion caused by Heathrow Airport, contributions could be sought from BAA on the basis that such schemes would make journeys to the airport more reliable.

Maximising available road space

17. *How effective are TfL's measures to limit road works, such as the lane rental scheme? How can these measures be made more effective?*

The measures TfL has implemented seem effective as initial measures to control road works, our only adverse comment being that at times the adjoining local authority does not always receive consideration where the traffic is diverted onto the local authority's road network.

TfL can now look to trial more innovative ways of limiting the impact of road works, primarily ones ensuring that utility or road works are planned to complete as fast as possible. This should involve road works being underway constantly until completion, including contractors working long days and weekends. Failure on the latter should be considered as a reason for closing the job down. Operations should be planned as multi-shift pieces of work with greater contingency for over-running. There should also be more funding to councils, received from utilities, to cover for council network management officers needed to oversee road works at weekends, to ensure their effective progression. Finally, there should be improved communication between all those involved in road works in London.

18. *What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?*

The short-term impact of providing additional space for cycling and pedestrian infrastructure on congestion is often negative, with implementation works causing delays for traffic. In the longer-run, there should be gains in terms of further increases in the number of people cycling, encouragement of walking and improvements to the urban realm of towns and residential areas.

Active traffic management

19. *How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?*

Key benefits of the iBus system are firstly the information it provides to users about the location of buses in London. This allows users of the network to make decisions about when to leave home to wait for a bus and to be informed about how long until they can expect it to arrive. Secondly, iBus provides bus operators with information about the location of their buses on the network and allows them to inform drivers about when to make changes to journeys, for example if there is unexpected congestion. Ongoing development of iBus will continue to make bus travel more attractive for users and potential users. In addition to usage for the bus network, iBus technology could potentially improve the capability of vehicle satellite navigation systems by offering dynamic information about where major delays are being encountered. It could also be applied to freight and delivery management around London, enabling logistics operators to instruct drivers when to make certain delivery or pick-up trips.

20. *How effective has the Road and Transport Enforcement team been in tackling congestion?*

This is not a high-profile team and it is not yet clear what it aims to achieve; we were not aware of it until recently. It is too early to judge how effective the team has been, although it appears to be quite a small enforcement team given the size of London.

From: Dimitrios Dikmpasanis [redacted]]
Sent: 24 August 2016 14:48
To: Georgina Wells
Cc: Greg Macdonald; Keith Fraser
Subject: Sutton: London Assembly Transport Committee - Congestion Investigation - Call for Evidence

Dear Georgina,

Please find attached two reports related to traffic congestion in our borough.

These reports are published in our evidence base website. In the first report (Transport Data Report) the relevant chapters are Chapter 2 and 4. In the second one all chapters have a relevant subcategory (Traffic Flows & Delays).

If you have any further question, please let me know.

Kind regards,

Dimitrios Dikmpasanis

Transport Planner

Strategic Planning

Environment, Housing and Regeneration Directorate

London Borough of Sutton

24 Denmark Road, Carshalton, Surrey, SM5 2JG

Tel: [redacted]

E: [redacted]

From: Donnelly, Camillus [redacted]
Sent: 08 August 2016 13:24
To: Georgina Wells
Subject: Investigation into traffic congestion in London

Good afternoon Georgina

I assume this is your correct email address, fyi, this is the email address on the consultation leaflet [redacted], I assume the K should not be in the .gov part?

I have been forwarded the consultation on the investigation into traffic congestion in London and been asked to provide a response on behalf of Wandsworth Council Network Management Team. Managing traffic congestion in London is no small task and I don't see any easy answers but I have responded to most of the questions in the consultation below. Unfortunately I can't offer a quick fix solution to this problem but I'm happy to work together on a way forward.

General questions
1.How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?
Traffic congestion has obviously increased in recent years as you would expect in a big city like London. The key times are still the same as in the morning and evening rush hours and the key congestion hotspots are still pretty much the same.
2.What are the key causes of these changes in congestion?
The key causes are that population in London continues to increase year on year meaning more vehicles on the roads. Also most roads and local infrastructure have been about a very long time and require upgrading and maintenance which leads to more roadwork's and congestion. Big new developments and infrastructure projects like Tideway and the Northern Line Extension all lead to more vehicles on the road adding to the already heavily congested network.
3.What impact does congestion have on Londoners, the city's economy and its environment?
Congestion has a severe negative impact on every road user, the economy and the environment. Vehicles caught in congestion are idling adding more pollution to the environment, extended journey times are having a negative impact on the economy with Londoners caught in the middle trying to live their daily lives.
4.What can London learn from other cities in its effort to reduce congestion?
We are not the first city to be faced with this problem and it is well worth while investigating what other cities have done to combat the issues. Lane shares could be a suggestion as so many vehicles on the road have only the driver in them.
In addition to these general issues, the Committee has identified a number of different approaches to tackling congestion, most of which are already being used by TfL to some extent. We have posed a number of questions in relation to these different approaches and interventions.
The six approaches outlined below are not necessarily mutually exclusive and could all be used to reduce congestion in London. The Committee will seek to recommend the most effective measures, ensuring an appropriate balance between the competing priorities Londoners have for their road network.
Charging for road usage
TfL already operates the Congestion Charge scheme in central London, and pollution-based charges are in operation or will be introduced.1 Tolling of specific roads such as river crossings has been proposed. The Mayor also has the power to introduce a Workplace Parking Levy.
5. How effective is the Congestion Charge? How should this scheme be modified?
It seems to be effective in central London, however this forces motorist into other parts of London meaning you are not solving the problem just moving it somewhere else.
6. To what extent would a usage-based road pricing regime help reduce congestion?

Not sure how this would work or be managed, people already pay tax to use their vehicles. Any new roads could have a toll on them.

7. How might the Ultra-Low Emission Zone and Emissions Surcharge affect congestion levels?

This should help. We may well be looking into proposals such as this to combat pollution in some of our worst affected areas.

8. What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London

Measures to target specific types of vehicle

Heavy road users – like commercial delivery vehicles, minicabs or private cars – could be targeted with specific measures. There could also be efforts to reduce bus traffic.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Work with local business to develop collaborative deliveries to avoid vehicles on the roads delivering relatively small amounts of goods to one business.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Minicabs should all be made zero emission vehicles over the next 5 years

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

This is difficult to manage as in order to make buses more effective you need to increase journeys which means more vehicles on the roads. All buses need to be made low/zero emission in the near future

Encouraging modal shift

Greater use of more sustainable transport modes, particularly public transport, walking and cycling, would help address congestion.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Public transport is not very attractive or affordable. Trains are severally overcrowded and overpriced making them simply not an option for most people. Trains need to be increased and it needs to be made more affordable as this is key to reducing the number of Londoners that use private vehicles for transportation.

Providing new road infrastructure

There are proposals for new road infrastructure in London, including river crossings and tunnels, which TfL has considered or is now actively pursuing. These include, for instance, the Silvertown Tunnel across the Thames in east London, and a tunnel from A40 at Park Royal to the A12 at Hackney Wick.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Yes, this would help, but where do you put it? There simply isn't any space for new roads or bridges in much of London. It may be that we need to build more tunnels or flyovers but these don't always go down well with the locals.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Any new roads should be toll roads to help pay for them and stop people using them unnecessarily.

16. How should new road infrastructure be funded?

Toll charges

Maximising available road space

Space on London's roads is often restricted by construction work or other roadworks. TfL uses measures such as a lane rental scheme to manage this. In some cases, road space is diverted permanently for other key priorities such as cycling infrastructure or improved pedestrian space.
17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?
Most roadwork's are essential, meaning they take place anyway and pay the charges which in turn are passed on to the customers.
18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?
This has been a disaster for most road users apart from cyclists. Reducing capacity on busy streets to make them more cycle friendly is great in principle but traffic levels have increased so by reducing road capacity the congestion problem has been made much worse. Many of these new wide cycle ways are relatively quiet while motorists sit in long queues of traffic beside them.
Active traffic management
TfL uses technology to monitor and manage traffic, for instance altering traffic signals to respond to incidents causing congestion. It has also recently introduced a Road and Transport Enforcement team to provide an on-street response.
19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?
NB
20. How effective has the Road and Transport Enforcement team been in tackling congestion?
NB

Kind regards

Camillus Donnelly
Network Assurance Manager

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Westminster's response to the London Assembly Transport Committee – congestion investigation

Date: Friday 2nd September 2016

Traffic Congestion Questions

In summary, our view is that the purpose of reviewing congestion is to find solutions to enable the growth of London, principally by encouraging modal shift. Increasing congestion in Westminster is primarily caused by changes in transport and the opening of the Elizabeth line. Managing this increase in congestion requires better provision and organisation of the rising number of freight deliveries and greater control to be excised on Private Hire Vehicles. Westminster considers that this might include:

- TfL to review the Congestion Charge
- TfL to manage the number of Private Hire Vehicle's (PHV's),
- TfL to play a greater role in coordinating and reducing coach movements across central London,
- TfL to provide greater encouragement of car sharing (use of Car Club vehicles) as opposed to private car ownership,
- TfL to review / redesign the London Bus Network in response to the Elizabeth line,
- TfL to develop strategic freight polices, including consolidation,
- The DVLA to record and make available emissions data, and
- Boroughs to consider introducing bay sensor technology in London.

As a general point, although the London Assembly is focussing on the actions of the Mayor and TfL it is worth emphasising that success in tackling congestion depends upon working in conjunction with councils to integrate planning and transport together etc, because the boroughs manage the vast majority of London's highway network and parking.

A second point that may be beneficial is to track how these issues change and develop over time by creating a database of facts, arguments and examples.

1. **How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?**

- The greatest change has been the rise in Light Goods Vehicles (LGV's), PHV's which are believed to have dramatically grown in the last four years from 50,000 to 110,000 licensed vehicles in London, and also cyclists during the past five years. Whereas Heavy Goods Vehicles (HGV's) and cars have decreased substantially. This rising congestion is also believed to be causing buses to slow down for the first time since numbers were increased in 2003 following the Congestion Charge.
- The only notable reduction in LGV's occurred in 2008 at the peak of the recession because this mode is closely aligned to the economy. This is believed to be because there were typically fewer on-line parcel deliveries being made and fewer construction workers in vehicles.
- Congestion is also believed to be increasing because the competition for kerbside space has spiralled in recent years with over 36 individual uses demanding more of the carriageway during the day and night.
- Congestion occurs throughout most of the day and into the night and for all days of the week in much of the West End and across other parts of central Westminster. Thus there is no inter peak between AM and PM peak times, day and night flows and weekdays and weekends. Central London also has a much later PM peak 'tail off time' compared to other urban centres. Indeed, in some critical parts of the West End the peak traffic levels are higher at 2am than 2pm - and traffic levels on Sundays are increasing to near Saturday or weekday flows.

- In 2003 the Central Congestion Charging scheme statistically and anecdotally reduced the number of private vehicles entering central London and much of Westminster. Since then traffic levels have crept up and now exceed the 2003 benchmark as is reported in TfL's Travel in London reports and on-going stakeholder liaison with Taxi, Bus, Coach and Freight industry contacts.
- The lack of control over utility works, combined with a recent increase in TfL measures, have also exacerbated congestion in central London.
- Therefore in response to this rising congestion and the introduction of the Elizabeth Line and the Thameslink upgrade, the road network, and especially the London Bus Network, needs to be reshaped to maintain carriageway capacity, network resilience, kerbside access and improve public realm. This will enable parts of central London to be redesigned to accommodate the strong increase in residents, businesses and visitors from the Elizabeth line and Thameslink.

2. What are the key causes of these changes in congestion?

- The massive rise in PHV's has greatly increased the number of vehicles driving and parking in central London.
- The recent sharp rise in cycling can slow the speed of vehicles on narrow single lane carriageways, but it can also improve traffic flow by breaking up dominant traffic flows at roundabouts for example.
- Recent rises in LGVs and cycling and reductions in HGVs and cars (as noted above).
- Rising pedestrian activity at key crossing points can disrupt traffic flows.
- The historic rise in buses post Congestion Charge in 2003.
- Increases in coaches and the problems they cause, especially for residents around Tourist hotspots.
- Traffic signal re-phasing can increase traffic congestion, especially where new pedestrian phases are added or longer phases created on SRN routes etc.
- Bus congestion creates a snowballing effect of more people alighting and increased crowding which creates greater delays.

3. What impact does congestion have on Londoners, the city's economy and its environment?

- Congestion, if allowed to develop, is roughly self-levelling because the delays to essential journeys deter driving for non-essential journeys.
- Delays to everyone's journeys as motor vehicles are caught in traffic often then blocking pedestrian crossings and cycle lanes.
- Many logistics companies report a decrease in the number of 'drops' a vehicle can undertake due to longer journey times in central London caused by congestion.
- Taxi drivers anecdotally advise that fares for traditional journeys have increased for the same reason.
- Increased air pollution, which is of great concern for Westminster's politicians and businesses who have partnered together to successfully secure funding for the Low Emissions Neighbourhood in Marylebone to address these problems.

4. **What can London learn from other cities in its effort to reduce congestion?**

- There are few cities that compare to London in terms of its size, streets, complexity and society. Despite this lessons can still be learnt from London's similarities to other global cities.
- Most forward thinking cities forge strong partnerships to create fully integrated systems (physically and ticket wise) between buses, trams and rail networks to manage and reduce car use, especially when provided with sufficient funding and long term planning. Many French cities, including Paris, have upgraded their bus services to trams to increase patronage, reduce pollution and encourage greater economic regeneration. The city of Curitiba in Brazil redesigned their bus services and stops to provide many of the benefits of trams and planned

adjacent land uses to support this improved public transport system. Copenhagen provides many lessons for encouraging cycling and walking. New York provides examples of temporary trials to test new road and public space layouts, as well as the quick implementation of cycle lanes. Other cities like Rome provide examples of experiments to avoid, for example restricting driving into the city to vehicles with odd and then even number plates on alternate days, which encouraged residents to buy two cars.

- London is open for longer into the night with the night time tube, and it would be good to understand how other cities have tackled the problems created by traffic and freight delivery noise where there are residents in close proximity.

5. How effective is the Congestion Charge? How should this scheme be modified?

- The benefits from the Congestion Charging Scheme of lower traffic levels, congestion and pollution have been eroded since it was introduced in 2003.
- Its benefits have been eroded because traffic is changing away from private cars, etc which were the focus of the Congestion Charge to commercial vehicles and vehicles for hire, which have increased substantially and either have to be in central London or are not charged for being there.
- London is changing with the introduction of the night tube and the Elizabeth line that will greatly affect the central area and thus the Congestion Charge should be tailored in response.
- Technologies are also changing with PHVs introducing the concept of a variable cost model based on predicted times of higher congestion and this should be monitored.
- TfL should review the Congestion Charging scheme and other air quality charges (T charge and ULEZ).

6. To what extent would a usage-based road pricing regime help reduce congestion?

- In central London past increases in the Congestion Charging scheme did little to reduce the number of vehicles entering the Zone. However, the introduction of the night tube and especially the Elizabeth line could make drivers more sensitive to the amount charged.
- Private vehicles are no longer the main cause of congestion, and so a usage-based road pricing scheme does not provide the answer. As stated elsewhere, looking at how to reduce PHVs, coaches, and freight movement are more important to resolving congestion.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

- It may be effective as noted above, however it will become redundant in the next decade as it is overtaken by new cleaner technologies that will again increase congestion.

8. **What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London**

- New river crossings would presumably be outside central London, which may make tolling acceptable. It could also be a way of encouraging modal change from vehicles to public transport, walking and cycling.
- Road bridges or other major vehicular infrastructure into central London would not be helpful as it would only increase traffic, congestion and pollution.
- Workplace parking levies would have little impact on parking provision and could drive business from central London and so are not supported.
- Collecting Vehicle Excise Duty would also be very low in central London because car ownership is low and many commercial vehicles are registered in other parts of the UK.
- The Council is keen for the DVLA to provide engine information to enable clearer decision making on cleaner modes of transport.

9. **How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?**

- Help to establish consolidation schemes to support businesses and enable them to reduce the number of journeys and size of vehicles entering central London.
- Consolidation centres could be planned into the regeneration areas that surround central London as an easier way to build purpose built facilities without affecting existing communities.
- Encourage use of parcel collection services close to where people live to reduce the number of vehicles making internet shopping deliveries to congested workplaces in the West End.
- Greater reference to coaches and the problems they cause, especially for residents around tourist hotspots.

10. **To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?**

- As above, this is a very big issue due to rapidly increasing number of PHVs, which have had a substantial impact on the highway network in the West End, in particular. Early evidence suggests that there are particular problems with circling vehicles, which increases traffic congestion, pollution and the likelihood of collisions. There are also issues with their use of limited kerbside space, when waiting for work.
- In order to manage traffic congestion the City Council has twice asked TfL to consider "managing" the number of PHV licences through its' well regarded Taxi and Private Hire licencing authority. This management of licences could also be used to prevent monopolies from forming.
- We welcome the Mayor's announcement to resource more on-street enforcement, and encourage him to do more.

11. **What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?**

- Car clubs can make a significant contribution and Westminster has been very supportive of car clubs, but they are demanding to introduce a floating system to allow them to park in various parking spaces which will make them much like self-driving taxis. This would greatly increase the appeal of driving car club vehicles and allow them to compete with the PHV market, so careful management of their development is also key.
- The potential introduction of new charges (through T charge and ULEZ) gives TfL an opportunity to encourage car owners to make a shift to using car clubs rather than to replace a privately owned car. TfL could do more to encourage car sharing.

12. **To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?**

- The historic increases in the London Bus Network have reached their limits by extending bus services to many new parts of London, but the majority of bus routes focus in on central London creating congestion eg across the West End, Aldwych, Victoria, Edgware Road, etc. Thus the London Bus Network needs to increase its efficiency by improving vehicles and routes by becoming a Bus Rapid Transit or tram system. Both involve considerable costs and interventions, so a first step is to reshape the bus network away from improved rail services, ie Thameslink, Crossrail, etc.
- In some residential areas the passage of high density bus routes, including night services, has had a toll on local communities, eg the Chepstow Road area near to Paddington.
- Westminster supports a root and branch review of the central London Bus Network to reduce service levels in some central areas and times and increase them in other outer areas and times. Consider introducing limited stop express routes on some outreach corridor routes, a wider roll

out of the new hopper ticket and the hubbing of certain services at key Underground, Overland or Crossrail stations where there is public agreement to do so.

- The congestion caused by coaches should also be considered. Can Crossrail help to reduce the appeal and number of coaches?
- Crossrail could also help to reduce the number of night buses and their impact on roads with residents.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

- In central London the use of the private cars for day time journeys is already very low and may be shifting to using PHV's.
- Realise the modal change potential from the Elizabeth line by providing higher quality public spaces that can accommodate the increased number of passengers entering central London.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

- New roads would increase driving and new infrastructure is not supported.
- However, it may be possible to improve some junctions to reduce congestion by encouraging slower driving and thus the creation of simpler, more compact layouts that are more efficient. Piccadilly Circus was changed from one-way to two-way to ease congestion. Examples include the Great Queen Street / Drury Lane junction which started the trend to remove traffic signals so there is no red light for vehicles or pedestrians. Closing the end of Earlham Street stopped vehicles merging onto Shaftesbury Avenue and creating congestion immediately before the traffic signals at Cambridge Circus.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

- Roads are built to enable people to drive. Within Westminster there are virtually no opportunities to build new roads, except for the previous proposals for north - south tunnels under Hyde Park, etc.

16. How should new road infrastructure be funded?

- Not an issue in Westminster for the reason above.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

- Recent trials of the London Permit Scheme (LoPS) and especially TfL's Lane Rental Scheme (LRS) have been effective. The LoPS is for all works on the public highway by all London Highway Authorities and allows us to more effectively manage their road network. But there is no incentive to be quicker and finish early because the payment is the same for a "standard" 5 or 10 day work permit.
- The LRS is more effective because it incentivises promoters to complete their work earlier by charging £800 or £2500 a day (depending on the traffic volume etc).
- Section 74 (part of the legislation imposes charges up to £10,000 a day on over-running utility works) is an extremely effective tool in reducing disruption caused by street works. The number of contractors being charged is now far fewer due to the increase in the daily rate and this scheme being over 15 years old.
- The LRS can be improved in several ways. Allowing the LRS on Borough streets would help (it is currently only TfL roads in London). More benefit could also be delivered if the rules around spending Lane Rental income were relaxed a little. Authorities should also be able to challenge the duration of works at any time. Because we currently agree say 20 days' work and notice

that very little is happening on site, but we have no mechanism to reduce the duration of the works. We also need more than 10 days' notice before a new connection to a major development to help coordinate two or more contractors working in a street to reduce their impact on the public.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

- At this stage, it would be wise to assess the effect of the Cycle Superhighways before additional schemes are introduced. Existing schemes must be properly evaluated and amended where necessary as a first step.
- Trafalgar Square was greatly improved by pedestrianising the road beside the National Portrait Gallery. Oxford Circus improvements benefitted both motor vehicles and pedestrians. Piccadilly's conversion to two-way working also created more public space. The Great Queen Street scheme was traffic neutral and even improved traffic flow by removing the signals, whilst creating a small new square. Likewise the improvement of the Long Acre / Bow Street junction by replacing the mini roundabout with a staggered junction has had little impact on traffic whilst again increasing the public realm.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

- Passengers need live information delivered to their smart phones before they leave their house to alert them to any problems with their journey so they can choose better options. So that passengers have more options than when they arrive at stations or stops. This needs to include information from rail companies to provide a complete picture of the travel options in London.
- Traffic control and Congestion Charging CCTV systems are well advanced, and the key to making such schemes work is to do with political decision making.
- Road traffic speed in central London is so low and easily subject to disruption that there is little merit in introducing variable speed limits to better control highway capacity.
- A multi modal Oyster card replacement system could encourage users to switch from bus to Underground, Surface Rail, Crossrail, Cycle Hire, car club, etc more easily that could lead to reductions in journey times for all.
- Wider acceptance by TfL and other London Boroughs of Westminster's Bay Sensor scheme to assist with parking could also enable better enforcement that could create greater economies of scale, especially if coupled with satellite navigation systems.
- We welcome the Mayor's proposal to indicate poor air quality days on electronic bus countdown signs. This information should be included in the smart phone app in the first bullet point and enable people to choose low pollution routes.
- LTCC and ATM need a proper review and assessment by TfL and boroughs as part of the new Mayor's Transport Strategy and London Plan as they mostly involve the boroughs roads.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

- Before TfL was created in 1999/2000 it is understood that management of the strategic roads across London was limited in number and scope. The immediate implementation of the Red Route Network with its greater controls on parking, loading and waiting had a sea change effect on the capacity management of these roads. This indicates that it may be beneficial for boroughs to be given similar powers to improve their control over their Strategic Roads (including roads like Victoria Street, Bayswater Road, etc).

End

London Cycling Campaign response to the London Assembly inquiry into congestion. August 2016

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 40,000 supporters of whom 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

LCC is a member of the Healthy Air Campaign, a coalition of household-name health, environment and transport organisations co-ordinated by Client Earth, that campaigns to clean up London's and the UK's air.

Introductory remarks

London Cycling Campaign welcomes the opportunity to comment on the issues surrounding congestion in London.

At the outset we note, and challenge, what appears to be an assumption in the briefing that completed cycling infrastructure is a major cause of congestion. The use of relatively short stretches of cycling infrastructure to help double the number of cycling journeys in London (the current TfL target) is a more efficient use of road space that any alternative and helps, in the longer term, to relieve congestion and enable the movement of London's growing population.

It is worth noting that while road works and cycle lanes are singled out in the briefing as key causes of congestion, new tunnels, bus lanes and pavements are not. The two new cycle lanes in central London, which remove a relatively small portion of road space along their length (one lane out of four over a distance of 8 miles) have only been in place for three months so we cannot yet know what their impact will be. We do however know already that cycle use along them has increased by up to 70% at peak times. Cycles occupy less than a sixth of the space on a road compared to a private car. We can also reasonably assume that the introduction of eight miles of cycle lane in central London is unlikely to have been a major cause of congestion across the other side of London.

Below, LCC examines the factors affecting congestion and reinforces the case for improving cycling conditions as a way of easing pressure on the roads and public transport as well as benefitting Londoners through reduced pollution and greater public health.

Summary

We share the Mayor's view that London must become a 'byword for cycling.' Increased cycle use can help London tackle the daily transport needs of an increasing population while improving people's health and by reducing the amount of air pollution. The evidence of the past decade demonstrates that cycling levels can grow significantly if the right measures are adopted.

Increased road building will not, overall, reduce congestion, except for short periods, as motor traffic increases to fill the new road space – an effect known as 'induced demand'. Road pricing, recommended by most academics and motoring organisations alike, can be an effective way of addressing congestion over the short term but to deliver the full benefit of such schemes, the space gained must be used to facilitate more efficient transport modes than private motor transport. Otherwise, of course, the market eventually adapts and the traffic returns.

Factors affecting congestion

Factors restraining congestion include:

- Increased costs of motoring (including parking)
- Longer journey times
- Modal switch away from cars
- Economic slowdown
- Fewer collisions
- More efficient deliveries
- Fewer roadworks
- Promotion and facilitation of alternative modes
- Lower car ownership
- Lower car use
- Better use of rail freight

Congestion is increased by:

- Collisions
- Road works
- Reduced motoring costs (including parking)
- Shorter car journey times (which attract more motor vehicles)
- Modal switch to cars
- Economic growth
- Promotion and facilitation of motoring
- Population growth

Demand for road space

London already sees an effectively unlimited demand for road space and, according to TfL, this demand will remain high as London's population continues to grow[1]. In such conditions it is

[1] TfL Investing in London's Road Network 9 January 2014

unrealistic to expect that increased allocation of road space to motor vehicles will create free flowing driving in the capital even if homes, bus lanes, cycle lanes and pavements were given over to motoring.

Professor David Begg, of Aberdeen University and former government adviser on transport, suggests that in dense urban conditions, with high demand for motoring, such as London, motor traffic average speeds tend towards 10 mph. Below this figure people will seek alternative transport modes (assuming these are available), restrict their travel, or local authorities will intervene to change conditions (for example by road pricing or by offering transport alternatives).

Attempts to support growth in motor vehicle use through road building (such as tunnels) and re-allocation of road space (and signal time) to motor vehicles will, inevitably have detrimental effects on pollution, people's health and, in the longer term, lead to still more congestion.

Air Quality

To radically improve air quality the Mayor should incentivise "modal shift" to walking and cycling: the Mayor must make walking and cycling safe and attractive enough to become the norm (particularly for local journeys), as well as improve public transport and access to car-sharing schemes (as an alternative to car ownership). It is vital to enable a far wider range of people than ever before to feel confident and comfortable with these alternatives to driving if we want to see more than very minor modal shifts.

Mass modal shift is vital to reduce motor traffic and thus help clean up London's air, and the potential to do so is enormous: surveys show 25% of Londoners would like to cycle or cycle more (compared to the 2-3% of trips currently made by cycle), and in some parts of London around 50% of car journeys are under 3 miles in length. The need and opportunity to maximise modal shift requires the same attention by the Mayor as his justified focus on pollution.

Further, we note that Oslo has pledged to reduce motor traffic reduction by 20% by 2019, and phase out private car use in its city centre altogether. Large areas of Copenhagen are car-free, and Paris has begun to make areas of the city car-free (albeit only at certain times). London, which is of course a much bigger city than those cited can learn from these examples and itself introduce car-free zones across the city. Plans to make Oxford Street motor traffic free are an excellent start.

Costs of motoring

The recent increase in congestion in the capital parallels economic growth (following the downturn in 2008) and reduced motoring costs. The RAC foundation index of motoring costs for the UK http://www.racfoundation.org/data/cost-of-motoring-index shows them dropping compared to the cost of living with the purchase price of vehicles in particular showing a significant drop.

Motor vehicle sales in the UK In 2016 the UK reached a record of almost 1.5 million in the six months to June 2016 and showed steady growth of 2.5% http://www.smmt.co.uk/category/news-registration-cars/.

The costs of running an affordable car in London exceed £3,000 a year http://www.standard.co.uk/news/transport/car-ownership-costs-london-drivers-more-than-3000-a-

year-a3172511.html and while the proportional additional cost of an extra journey in terms of fuel may be perceived to not be great, other costs can play a role in deterring car use.

Access to car parking is a prime deterrent to motoring in some capitals notably Tokyo (City Cycling, Pucher et al 2012) and Amsterdam where there are long waiting lists for residential parking. In London, residential parking charges remain very low compared to the cost of commercial parking And car parking at workplaces remains a valuable tax-free benefit.

Congestion charging in London kicked off the upturn in cycle use with riders entering the CCZ after the first year up by a third. Clearly some motorists switched to cycling, or switched to public transport while public transport users switched to cycling. Congestion decreased overnight although it has gone up over time, exactly as predicted by the theories of Professor Begg. While the congestion charge in central London has since increased from £5 in 2001 to £10 in 2016 this has not been enough to reduce demand. The elimination of the western charging zone was an effective decrease in the costs of driving into Kensington and Chelsea.

The Mayor's London Plan does offer the option of road pricing as a way of reducing congestion and there are now the technical options to introduce sophisticated pricing systems depending on time and location. Charging for the most polluting vehicles may discourage a degree of car use though it is unlikely to have the impact of the CCZ.

Any pricing system needs to be accompanied by a reallocation of road space gained to the more efficient, and cleaner, transport modes whether walking, cycling or public transport. In the City of London, walking in particular benefitted from increased space allocation following the 2003 congestion charge implementation.

Journey times

People value their time when travelling while also considering costs, convenience and safety.

In the absence of congestion charging, in most of London longer journey times, along with parking access and charges, are the primary constraints on motor vehicle use. If significantly improved journey times were on offer in the short term, for example though the construction of more tunnels, a greater number of people would likely choose to drive to their destinations, thereby increasing congestion in proximity to any new road space. If, on the other hand, public transport, walking and cycling facilities were improved instead the switch would be in the other direction.

Origin/destination data from the Silvertown tunnel consultation indicates that a quarter of private cars journeys from south London and Kent via the Blackwall tunnel are to the Canary Wharf area which adjoins the northern mouth of the tunnel. Adding another two motor tunnels could double this demand. On the other hand, suitable cycling, walking and public transport connections to Canary Wharf, coupled with road pricing, could reduce the motoring demand significantly.

The literature on the link between road building and motor traffic growth dates back to SACTRA 'Trunk roads and the generation of traffic' of 1994. The converse approach, allocation of (albeit minimal) amounts of road space to cycle use in London has seen a surge in cycling in the capital with key routes now attracting more than 1,000 cyclists per hour at peak times (TfL presentation 2016)

and accounting for 70% of all vehicles crossing Blackfriars Bridge at peak. Overall London has already seen cycle use double from fewer than 300,000 journeys to more than 650,000 per day.

Modal switch

The growth in cycle use in London, as well as cities like Paris, Seville and Copenhagen, is undisputed. Copenhagen, with weather no better than London's, now boasts a cycling modal share of 40%. In London , as noted above, cycling growth has averaged 5% per annum since 2003 demonstrating that, with the right measures in place, a growth target of (originally quadrupling cycling) doubling cycling again is well within reach.

One of the biggest prizes in terms of transport strategy would be a modal switch for the school run. In Holland more than 40% of school journeys are by bicycle whereas in London it is less than 2%. At school drop off time many London roads are clogged with parents making short journeys by car – the Government has previously stated one fifth of peak traffic is from the school run (see http://news.bbc.co.uk/1/hi/uk/3115206.stm). The difference in congestion levels during school holidays is particularly noticeable.

Creating safe routes to school benefits the health of children and helps reduce congestion. Where safe routes already exist, for example on the periphery of the East End's large and cycle-friendly Victoria Park, cycle trips to schools and nurseries are much higher than elsewhere. The Mayor's commitment to cycle-friendly town centres and healthy streets is a policy that could encompass many school journeys.

It is worth noting that population growth has reduced many school catchment areas significantly making potential walking or cycling trips to school ever shorter and more easily improved for active travel.

It's also worth noting that some commentators have suggested that modal shift towards cycling will not be from cars – and thus not reduce congestion. The experience in Seville, according to transport researcher Dr Rachel Aldred (http://rachelaldred.org/writing/buses-bikes-and-congestion/), is that this is not the case – there, bus users were the primary group to switch to cycling; but then drivers switched to buses, growing overall use of the public transport network in doing so.

To summarise, to encourage mass modal shift, two key elements are required: for alternatives (walking, cycling, public transport, car-sharing etc.) to be comfortable, cheap, safe and attractive; and for driving to be less attractive as a transport choice (whether through congestion charging, or parking restrictions and route restrictions in residential zones) .

Economic growth or slow down

The correlation between economic growth and higher volumes of motor traffic is well established. More journeys to work, more goods transported, more PHVs, more online sales all play a role. Unless there is a determined political commitment to minimise the growth of motor traffic and provide alternatives, as in Copenhagen for example, economic and population growth inevitably leads to greater congestion. Seeking to attribute congestion to a small number of cycling facilities, in circumstances of robust economic growth and wide-spread construction activity, can lead to poor long-term policy decisions which will have adverse impacts on congestion. A decision to restrain

potential cycling growth by sustaining or increasing road danger levels instead of reducing them would undo the only consistently progressive and sustainable trend in London transport.

London is unusual in having a policy in the London Plan of reducing car dependency in central and inner London (though not yet in outer London). LCC would welcome the extension of a policy of reduced car use to apply across the whole of the capital because this would encourage the provision of improved public transport links and improved conditions for walking and cycling.

It is regrettable that the UK government currently accepts, and plans for, ever-increasing use and ownership of motor vehicles. As is well documented, this trend undermines public health, air quality targets and adds costs in terms of congestion.

Promotion and facilitation of motoring

Motoring serves a large number of useful functions, notably the delivery of goods and services and providing mobility for users with limited access to public transport, walking and cycling. Where road space is constrained, as it is in London, that space needs to be prioritised for essential transport uses and the most efficient transport modes.

The default position for transport is not a level playing field. Motoring, despite its evident inefficiencies in dense urban areas, is heavily promoted by manufacturers who are addressing sales growth and not traffic congestion or people's health. Annual spending on motor vehicle advertising in the UK at more than 350 million pounds, far outstrips the spending on cycle facilities. The outcome is that, all other factors being unchanged, people are buying more and more cars (a record of 1.4m vehicles was reached in the first six months of 2016).

To counter the influential weight of motor vehicle advertising the attractions of alternative transport have to be that much greater. London, which has fewer households with cars, and far better public transport than most cities, has the potential to reduce car dependency if the political will to do so is there. TfL pioneered cycling adverts at a time when cycle facilities in the capital were poor, yet that promotional activity, in combination with other factors, helped secure growth in cycling. If promotional activity is combined with reduced road danger the growth in cycling has even greater potential.

A further benefit of reduced car dependency is that fewer vehicles on the road can help reduce the number of collisions (see below)

Collisions

A report to the TfL Surface Transport Panel in 2010 provided the following chart of causes of congestion on London's roads

Collisions	28 per cent
Vehicle breakdowns	9 per cent
Highway Authority Works	19 per cent

Utility Works	19 per cent
Special Events	4 per cent
Other issues (e.g. spillages, general volume of traffic etc)	21 per cent

Minimising collisions would thus have a significant impact on reducing congestion and delays. One of the evident benefits of providing protected infrastructure for cycle users (such as the East West cycle superhighway) is that potential conflicts are eliminated and collisions with cyclists are likely to be reduced.

LCC's campaign for safer lorries with much greater direct vision as a way of reducing collisions has been echoed by Mayor Sadiq Khan and recently been strongly backed by the report on HGVs by Loughborough University. The study showed very significant differences between current vehicles and concluded that 'low-entry' vehicles with grater direct vision would help reduce collisions. While LCC's prime focus is on cycle users, the better visibility out of such lorries would also help reduce collisions with pedestrians. A quarter of pedestrian deaths in 2014 involved collisions with lorries and recent research by Living Streets shows that the most common circumstance of such deaths is when the lorry is moving off .

We commend to the Assembly the Loughborough University study[2] which illustrates the visibility of pedestrians and cyclists from 19 different vehicles – In some cases near forward vision is fully obscured forcing drivers to rely on mirrors which takes time and may only offer a partial image. It is also worth noting that lorry drivers may not see stationary objects if their view is impaired – such collisions can also contribute to congestion.

Efficiency

LCC's view is that cycling is one of the most efficient and clean modes of transport but much can be done to increase the efficiency of other transport modes.

Martin Low, of Westminster Council, has often cited the example of multiple waste collections in Bond Street. According to the Standard (29 June 2016) this has now been reduced from 144 to 37 per day. Such numbers are staggering and highlight inefficiency. Borough audits of unnecessary duplication of work could help reduce congestion

Consolidation sites for HGVs do exist in London but they are not yet common enough. A range of construction materials for a number of sites is delivered to a specific location and then single vehicles deliver a range of materials a each construction site. https://tfl.gov.uk/info-for/deliveries-in-london/delivering-efficiently/consolidating-deliveries. This is cheaper for developers because they can buy in bulk and save on the number of deliveries.

2

https://www.transportenvironment.org/sites/te/files/2016_07_Study_Understanding_direct_indirect_driver_vision_HGVs.pdf

Concrete crushing on site has been pioneered in Southwark and enables developers to significantly reduce their number of lorry journeys. The crushed concrete can, in some cases, be directly transported to sites that need it. (Ref: TfL Michael Barratt).

So called 'early doors agreements' with developers and residents can allow a specified number of HGVs to arrive on-site at 7am and wait with motors off till the site opens. This reduces congestion and danger to school children at peak times. (Ref: TfL Michael Barratt).

Additional ducting installed during planned works can help reduce future works at nearby sites. It's effectively doing what the popular Carlsberg advert suggested.

The number of PHVs has grown significantly and may be undermining the incomes of those who offer such services. It remains unclear where the modal shift to PHVs is coming from. While PHVs do offer a public service, growth in numbers that does not replace private car journeys will have a negative impact on congestion and potentially on road danger.

PHV services, such as Uber, also rely on their drivers being in a state of constant movement – so the app's algorithms can spread drivers out across London and ensure a car is always nearby. Because the entire fleet is on the road constantly, rather than parked awaiting a fare, additional congestion is likely to be caused.

Innovations in transport and technology point to potential issues that London may face in the future – as car-sharing and PHV apps rise, and the "sharing economy" takes off, it's likely that even electric and autonomous cars won't solve the issues of huge numbers of cars drifting around London waiting between pickups and drop-offs – new sharing technologies could worsen the situation, as well as improve it). So we would urge the Assembly not to rely on a techno-fix that may not arrive.

Public transport improvements

Changes to public transport can deliver modal shift because public transport journeys are invariably quicker than car journeys.

The success of London Overground shows how improvements in rolling stock, stations, connections and reliability can make an existing public transport more attractive and efficient.

Following a policy of reduced car dependency across London (see above) can act as an incentive to local and London-wide authorities to improve public transport systems. Stratford is a case where the developer, Westfield, focused on motor vehicle access and car parking, but has found that public transport is the prime access mode with its car parks underused.

When car parking regulations in new developments are relaxed (as they were in the further alterations to the London Plan) the outcome is not only more parked vehicles at both origin and destination but a lower incentive for local authorities to improve public transport, walking and cycling.

London Assembly Transport Committee – Investigation into traffic congestion in London
Response prepared by the Licensed Taxi Drivers Association

The Licensed Taxi Drivers Association (LTDA) is the professional and authoritative voice for the licensed taxi trade in London, representing over 11,000 drivers. We have been supporting taxi drivers in London for over 50 years and are committed to assisting the trade and maintaining the high professional standards London taxi drivers are known for across the world.

The LTDA welcomes the Transport Committee's investigation into traffic congestion in London, which is one of the most critical issues facing the capital and the current administration in City Hall. As Deputy Mayor for Transport Val Shawcross rightly said: London is in the midst of a "congestion crisis"; a crisis because of the spiralling number of private hire vehicles (PHVs), decreasing road supply and an increase in the number of light goods vehicles.

The resulting gridlock not only affects traffic flow in the capital – adversely affecting both commercial enterprises and non-commercial road users – but also makes roads less safe and exacerbates London's already-poor air pollution problem.

The Mayor's office – via TfL – is responsible for managing traffic flow and the negative side effects associated with congestion. For the sake of all Londoners, it must use the tools at its disposal to do so. In particular, TfL must update the Congestion-Charge – a mechanism that was introduced specifically to control traffic – to incentivise good behaviour and counteract the current causes of congestion in central London.

TfL should also seek to gain more powers from central Government to ensure that it can effectively carry out its regulatory duties; above all, TfL should have the power to place a limit on the number of PHVs in London.

The LTDA has outlined its views on congestion – its causes and its remedies – in the following responses.

General Questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Change / Amount

- INRIX's 2015 Traffic Scorecard – published in March 2016 – showed that London is 'Europe's most congested city', with the average driver spending 101 hours in traffic last year. London is the first city to surpass the 100-hour mark; a 5.2% rise on the year previous[1].
- Including 'planning time' – the amount of additional time that people need to allow to reach their destination on time – this figure rises markedly.

[1] http://inrix.com/scorecard/

- Taking 'planning time' into account, INRIX and CEBR research found that drivers in London spent more than 250 hours idling in traffic in 2013, which is double the UK average – and this is set to increase to 299 hours in 2030, equivalent to 40 working days a year.[2]
- Further INRIX research shows that journey times in Central London have increased by 12% annually between 2012 and 2015.[3]
- Delays on the TfL Road Network in 2014/15 were 9.5% higher than in 2013/14.[4]

Time

- The LTDA represents 11,000 members, who live across all 33 London Boroughs, the Home Counties and beyond.
- According to our members, congestion has increased on practically all routes, in particular:
    - Coming into central London from the East and South East between 06.00 and 10.00.
    - Going from central London to the East and South East between 15.00 and 19.00.
    - Coming into central London from the West and South West between 07.00 and 10.00.
    - Going from central London to the West and South West between 16.00 and 19.00.
    - The West End between 22.00 and 00.00, Monday to Thursday.
    - The West End between 22.00 and 03.00, Friday and Saturday.

Type

- London has witnessed an unprecedented surge in the number of private hire vehicles (PHVs) – the total is currently over 110,000; an increase of over 40,000 in the last year alone[5] – clogging up the capital.
- PHV numbers are increasing at an average rate of 600 per week.
- In addition, the number of Light Goods Vehicles (LGV) in the Congestion Zone increased by 7.7% between 2012 and 2015[6], and now account for 17% of all vehicles in the Zone.
- However, the percentage increase is small in comparison to PHVs, whose number have increased by 56% in the last two years[7].
- Department for Transport data shows that the number of delivery vehicles (light goods and heavy goods) registered in London and the South East has increased by over 12% over the last decade.[8]

[2] http://inrix.com/press/traffic-congestion-to-cost-the-uk-economy-more-than-300-billion-over-the-next-16-years/

[3] http://inrix.com/press/london-traffic/

[4] http://content.tfl.gov.uk/total-vehicle-delay-for-london-2014-15.pdf

[5] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/456733/taxi-private-hire-vehicles-statistics-2015.pdf

[6] http://inrix.com/press/london-traffic/

[7] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

[8] https://www.gov.uk/government/statistical-data-sets/veh01-vehicles-registered-for-the-first-time, Table VEH0105 (comparing 2014-15 figures).

Location

- Much of the increase in congestion has occurred in central London.
- Minicabs traditionally operate in the suburbs, but the proliferation of PHVs has seen activity shift towards the centre.
- According to former Mayor Boris Johnson, one in every 100 vehicles entering the Congestion Zone in 2013 was a minicab. In 2015, "one in ten [vehicles in the Zone] are minicabs because of Uber".[9]

2. What are the key causes of these changes in congestion?

Increase in PHVs / arrival of Uber

- There are currently over 110,000 PHVs licensed in Greater London. In March 2015, there were 62,800[10].
- A Greener Journeys report published at the beginning of June 2016 estimated that the number of PHVs could hit 124,000 by the end of 2016, while noting that the "number of new minicabs has risen by 56% in the last two years, largely due to Uber".[11]
- The report clarified that the "advent of Uber" is one of the key causes of congestion in London, concluding that "the increase in PHV activity in London has lengthened journey times by over 10% over the past 12 months".
- Uber was licensed in 2013 and now has over 30,000 cars in London. A considerable level of growth that is causing gridlock on London's road network.

Decrease in road supply

- There is a general consensus that decreasing road supply has exacerbated the issue of congestion in London.
- INRIX found that planned roadworks in London increased by 362% between 2012 and 2015[12].
- Over 2015, there were 1,005 hours of planned disruption caused by roadworks – over three times as much as was caused in 2013 – while unplanned disruption also ballooned – the 2,663 additional hours Londoners sat in traffic last year being more than double the 2013 figure.[13]
- In addition to this, road closures in central London due to the construction of cycle superhighways and Crossrail have further reduced road space. Professor David Begg, Professor of Economics at Imperial College, estimated that in some areas, cycle superhighways saw road capacity reduced by 25%. This was

[9] http://uk.businessinsider.com/uber-statistics-boris-johnson-on-ubers-growth-in-london-2015-10

[10] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/456733/taxi-private-hire-vehicles-statistics-2015.pdf

[11] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

[12] http://inrix.com/press/london-traffic/

[13] Figures from the London DataStore, 2015 figures (1,005 planned, 2,663 unplanned_ compare with 2013 figures of 305 and 1,634 respectively).

contested by TfL's Managing Director for Surface Transport Leon Daniels, who said that in some areas "one lane out of four" has been reallocated to create segregated cycle routes" – a reduction of 25%.[14]

Delivery vans

- As a result of the booming e-commerce market – which is expected to top £60 billion in the UK in 2016 – an increasing number of delivery vans are clogging up London's roads.[15]
- On average over 2015, 7,300 entered the capital every hour during the morning rush hour – a figure which is only going to increase in the coming years as internet shopping becomes more popular.[16]
- LGVs, many of which are delivery vans, account for 17% of all vehicles in the Congestion Zone.[17]

3. What impact does congestion have on Londoners, the city's economy and its environment?

- Deputy Mayor for Transport Val Shawcross said that London has "a congestion crisis at the moment" and that congestion makes roads less safe and adds to air pollution.
- As the regulator, TfL is responsible for managing traffic flow and the negative side effects associated with congestion. It must use the tools at its disposal to do so.

Economy

- According to INRIX and CEBR research, congestion is costing London £5.4 billion a year: the equivalent of £2,765 per household.[18]
- Further research estimated that congestion in London will cost the capital $204 billion (£157 billion) between 2013 and 2030.[19]
- In 2030, London will lose $14.5 billion (£11.1 billion) as a result of gridlock (71% more than in 2015) – the equivalent of $6,259 (£4,827) per household.

Air Quality

- London tends to report the highest levels of nitrogen dioxide (NO2) of any city in the world. A July 2015 study[20] carried out by King's College London for the Mayor of London's office reported 5,900 premature deaths in London associated with NO2 exposure in a single year.
- TfL's Roads Task Force[21] found that motorised road traffic contributes 60% of particulate matter (PM10), 47% of nitrogen oxides (NOx) and 17% of carbon dioxide (CO2) emissions in London.

[14] https://www.theguardian.com/uk-news/davehillblog/2016/jun/15/london-road-congestion-causes-effects-and-what-happens-next

[15] http://inrix.com/press/london-traffic/

[16] To 9,000 within the next 16 years, according to the DVLA (cited in *The Times*, September 2015: http://www.thetimes.co.uk/tto/public/cyclesafety/article4544830.ece)

[17] http://inrix.com/press/london-traffic/

[18] http://inrix.com/press/traffic-congestion-to-cost-the-uk-economy-more-than-300-billion-over-the-next-16-years/

[19] http://inrix.com/economic-environment-cost-congestion/

[20] https://www.london.gov.uk/sites/default/files/hiainlondon_kingsreport_14072015_final.pdf

[21] http://content.tfl.gov.uk/technical-note-21-what-is-air-quality-on-the-road-network.pdf

- The preliminary findings of IPPR's *Lethal and Illegal: London's Air Pollution Crisis* supported this claim, highlighting that emissions from road transport have remained "stubbornly" high and contribute 48% of central London's NO2 (45% in Greater London)[22].
- In particular, the added number of PHVs is having a detrimental impact on London's air, both directly – through their own emissions – and indirectly – by causing heavily-polluting diesel vehicles to remain stationary.
- To combat pollution, all newly-licensed taxis will have to be zero-emissions capable from January 2018. However, PHVs are subject to much less stringent emission regulations than black taxis and the same rules will only apply to PHVs from January 2023[23].
- We welcome the Mayor's plans to bring forward and expand the ULEZ (a move that the LTDA, London Cycling Campaign (LCC) and Greenpeace recently supported)[24], but we believe that PHVs must be subject to the same standards as taxis.
- In a recent London Assembly Environment Committee hearing (13.07), Simon Birkett, Director of Clean Air London, said it was "shameful" that PHVs were not matching the same environmental standards until five years after black cabs, considering the wide range of ZEC vehicles currently available to them. He called on the Mayor to standardise and tighten the requirements for the taxi and PHV market[25].
- We agree and would like to see all newly-licensed PHVs to be ZEC from 2018 and for the minimum ZEC range to be increased to 50 miles, from the current 30 miles.

Londoners / Accessibility

- 16% (5.8m) of working age adults in the UK are disabled[26], with 9% reported to having mobility difficulty[27].
- For vulnerable adults in London – especially those that rely on the use of a wheelchair – private transport can be the only option to get from A to B. For example:
  - Only 67 of the 270 London Underground stations (around a quarter) have some degree of step-free access – around half of these are step-free from platform on to the train;
  - Only half of London Overground stations are wheelchair accessible;
  - London buses have low floor access, but there is no guarantee of travel as overcrowding can make getting on impossible.
- Black cabs are 100% wheelchair-accessible and guide dog-friendly – the only form of public transport that is – and are often the only form of public travel that disabled persons can take.
- As such, increased congestion unfairly discriminates against those that rely on surface transport.

[22] http://www.ippr.org/events/lethal-and-illegal-londons-air-pollution-crisis

[23] https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/taxi-and-private-hire-requirements

[24] http://www.greenpeace.org.uk/media/press-releases/cab-drivers-and-cyclists-join-greenpeace-demand-real-action-air-pollution-20160421

[25] https://www.london.gov.uk/environment-committee-2016-07-13

[26] https://www.gov.uk/government/publications/disability-facts-and-figures/disability-facts-and-figures

[27] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/489894/tsgb-2015.pdf

Londoners / Road safety

- PHV drivers only undertake a rudimentary topographical test and in many cases do not undergo formal training. As such, the vast majority rely on a satnav to get around, which can make life particularly tricky during periods of high traffic volume.
- As a result, the risk of collisions is increased during these times – due to sharp braking, illegal U-turns and going the wrong way down one-way streets.
- With many PHVs not having the appropriate insurance (due to the high cost of taking out a Hire and Reward policy, some Private Hire drivers replace it with a cheaper Social, Domestic and Pleasure Policy knowing it can't be picked up by police ANPR cameras), the risk to Londoners is increased, as PHV passengers will not be covered in the event of an accident.

4. What can London learn from other cities in its effort to reduce congestion?

- A recent study commissioned by the New York Mayor's Office[28] explicitly says that rising minicab numbers are contributing to overall congestion in the city – and the same is true in London.
- Cities around the world – including Stockholm, Singapore and Milan – have introduced congestion charging to address gridlock and environmental concerns, while other major cities – like Los Angeles and New York – have considered implementing a similar system.
- These cities, like London, realised the benefits that congestion charging can bring and the Mayor's office should look to update the C-Charge in London to address current causes of congestion.

Charging for road usage

5. How effective is the Congestion Charge? How should this scheme be modified?

Effectiveness

- TfL's report on the impact of the C-Charge – one year after implementation – showed that there was an immediate impact on congestion, with a 30% fall in non-exempt vehicles (with around 50-60% of this reduction attributed to transfers to public transport)[29].
- There was also a 13.4% fall in nitrous oxide emissions.
- The recently appointed Deputy Mayor for Environment and Energy Shirley Rodrigues noted in her 2008 presentation to the World Bank that the C-Charge led to a 20% fall in traffic, which was complemented by a 19% drop in CO2 emissions[30].
- Professor David Begg notes that the London Congestion Charge achieved its objective of cutting traffic volumes in the Charging Zone by 20% when introduced in 2003, but this has since been "more than cancelled out as road space has shrunk in central London through road works, cycle superhighways, growth in delivery vehicles and private hire".[31]

[28] http://www1.nyc.gov/assets/operations/downloads/pdf/For-Hire-Vehicle-Transportation-Study.pdf

[29] https://tfl.gov.uk/info-for/media/press-releases/2004/april/tfl-publish-ccharge-annual-report

[30] http://siteresources.worldbank.org/INTMENA/Resources/Rodrigues.pdf

[31] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

- In short, the C-Charge was an effective tool for cutting congestion, but this effect has been eroded over time.

Modification

- The C-Charge is a mechanism that was introduced specifically to control traffic in central London. It should therefore be updated to counteract the current causes of congestion in central London.
- PHVs now represent over 10% of vehicles entering the Charging Zone on a daily basis (a tenfold increase in the last decade).[32]
- PHVs are exempt from the C-Charge when carrying a passenger, but this is very difficult to enforce and most of them that currently enter the Zone, do so empty in search of a hire – because they are exempt.
- The former Mayor recognised this problem and proposed removing the Congestion Charge exemption for PHVs, in a bid to curb congestion and pollution in central London. We would like to see the new Mayor follow-through with this proposal.
- The vast majority of PH journeys do not require an entry into the CCZ and removing the exemption will encourage PHV operators to use their vehicles in a 'smart' way and will lead to quicker journey times.
- TfL could also use the Congestion Charge to help tackle pollution: by only allowing the most environmentally-friendly PHVs to be exempted from the Charge, thereby encouraging PHV operators to clean up their fleet and help the Mayor hit his air quality targets.
- Low-emission vehicles will continue to be exempt – there is nothing stopping PHV operators from upgrading their fleet and thereby maintain their exemption.
- In addition, traffic flow in the Congestion Zone does not subside at 18.00 and therefore charging hours should be extended to address this.
- With many shops in central London open later – for example, the average midweek closing time on Oxford Street is 21.00[33] – and the West End heavily congested between 22.00 and 00.00, we believe charging hours should be extended to midnight Monday to Saturday.

7. How might the Ultra-Low Emission Zone and Emissions Surcharge affect congestion levels?

- As noted previously, the taxi trade supports the implementation of an expanded and brought forward ULEZ.
- In preparation for the ULEZ, all newly-licensed taxis will have to be zero-emissions capable from January 2018. However, PHVs are subject to much less stringent emission regulations than black taxis and the same rules will only apply to PHVs from January 2023[34].
- So that the ULEZ can help clean up London's air and reduce congestion, requirements must be standardised and tightened; PHVs must be subject to the same standards as taxis.

[32] http://www.standard.co.uk/news/transport/mayor-unveils-english-tests-for-drivers-in-major-crackdown-on-uber-a3160771.html

[33] http://oxfordstreet.co.uk/visitor-info/visitor-information/

[34] https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/taxi-and-private-hire-requirements

8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure

- London is in desperate need of new river crossings in the East.
- The existing vehicle crossings – the Blackwall Tunnel, the Rotherhithe Tunnel and the Woolwich Ferry – are under considerable strain, and road investment has not kept up with population growth in the East and increasing road usage.
- Tolling may help to quell some of the demand, but ultimately new river crossings are needed.
- If tolling is to be introduced, then drivers in the East should not be penalised for where they live.
- Within the M25, there are 23 fixed road crossings west of Tower Bridge (not including Tower Bridge itself) but just two to the east[35].
- The bridges in the West should therefore also be tolled to help pay for new river crossings in the East.

- Workplace Parking Levy

- In line with decreasing car usage, the number of people that drive to work and park at a workplace in inner London is going down year-on-year.
- A Workplace Parking Levy will therefore only affect a very small fraction of the vehicles that contribute to London's congestion and City Hall could use the funds needed to establish and police the Levy in a more effective way.

- Devolving Vehicle Excise Duty to London

- As noted by IPPR, Vehicle Excise Duty (VED) needs systematic reform as it currently encourages the purchase of diesel vehicles[36].
- In light of London's increasingly poor air quality, City Hall is rightly trying to phase out the use of diesel cars to clean up the capital's air.
- Devolving VED to City Hall would therefore give London another tool to address air quality and congestion concerns.
- Any devolution of VED must be combined with a review of the Roads Fund License (RFL) and Benefit in Kind (BiK) offers. In their current form, both RFL and BiK incentivise the purchase of diesel vehicles as they are based on reducing CO2 emissions.

[35] http://www.publications.parliament.uk/pa/cm201415/cmselect/cmtran/714/714.pdf

[36] http://www.ippr.org/publications/lethal-and-illegal-londons-air-pollution-crisis

Measures to target specific types of vehicle

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Increasing number of PHVs

- As noted in response to Q2, London has witnessed an unprecedented surge in the number of private hire vehicles (PHVs) – the total is currently over 110,000; an increase of over 40,000 in the last year alone[37] – clogging up the capital.
- A Greener Journeys report published at the beginning of June 2016 estimated that the number of PHVs could hit 124,000 by the end of 2016[38].
- INRIX's 2015 London Congestion Trends found that cars, taxis and PHVs were not causing the rise in congestion, as travel using these methods decreased between 2012 and 2015 in central London[39].
- However, these figures do not give an accurate reflection of the situation, given that there is no distinction between the three methods of travel in the findings.
- For example, the findings do not take into account the trend of declining car ownership and use in London; car usage in central London fell by 15% between 1999 and 2013[40].

Uber

- Uber suggested that the INRIX report was proof of its effect on congestion in London, but INRIX is clear that "Uber commissioned this study" and that "data from Uber was acquired to address" the effect of PHVs on traffic in London[41].
- On the other hand, a Greener Journeys report – whose focus was the impact of congestion on bus journeys and did not have an ulterior motive with regards to PHV activity – found that "the advent of Uber" was one the key causes of congestion.
- It found that the "number of new minicabs has risen by 56% in the last two years, largely due to Uber"[42] and that "the increase in PHV activity in London has lengthened journey times by over 10% over the past 12 months."
- Clearly adding 30,000 cars (the number of Uber vehicles) to London's roads in three years is going to have an effect on congestion.
- Uber then tried to claim that it was having an impact on car ownership and usage in London, claiming that 7% of the app's users in London said they will drive less often, 5% have decided not to buy a car and 2% have got rid of their car altogether[43].

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[37] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/456733/taxi-private-hire-vehicles-statistics-2015.pdf

[38] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

[39] http://inrix.com/press/london-traffic/

[40] http://content.tfl.gov.uk/travel-in-london-report-7.pdf

[41] http://inrix.com/press/london-traffic/

[42] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

- However, this fails to take into account declining car ownership – especially amongst younger people – and the fact that London has by far the lowest rate of car ownership per capita in the UK[44].
- Uber cars are only on the road to pick up paying passengers: people are not choosing between driving their own car and getting a PHV, they are choosing between getting a PHV or another form of public transport.
- YouGov research commissioned by the LTDA in August 2016 found that nearly a quarter (24%) of minicab users have increased their minicab usage in the last two years, with 44% of them saying this increase has come at the expense of using a bus and a further 44% saying they used minicabs more frequently instead of taking the train or Tube.[45]
- Greener Journeys found that the general trend in declining car traffic has been offset by the increase in private hire and LGV activity.

Addressing the issue

- The Private Hire Vehicles (London) Act 1998 makes provision that the Secretary of State (who subsequently devolves the power to TfL) "shall" grant a PHV license if "satisfied" that the applicant meets the criteria[46].
- As the act says "shall" and not "may", there is no room for discretion: TfL is obliged to grant a PHV license if the criteria is met.
- As a result, TfL's hands are tied and they cannot stop the growing number of PHVs. It requires primary legislation from the Government to rectify this.
- As the local regulator with responsibility for passenger safety, the environment and congestion, TfL has repeatedly called on the Government to grant it the power to impose a cap on the number of new PHV licenses it issues; calls echoed by current Mayor Sadiq Khan and his predecessor Boris Johnson.
- Yet, the Government has refused to grant it this power, and so TfL is powerless to regulate the number of minicabs within its jurisdiction. In effect, TfL is prohibited from fulfilling its regulatory responsibilities.
- We have long argued that, as the local regulator, TfL is best placed to decide whether a cap on the number of new PHV licenses is necessary and we appreciate that the Mayor shares this view and is seeking powers from the Government to do this. We would like the Assembly to make the same request.
- However, the Mayor does have control over the C-Charge and we believe PHVs' exemption from the Charge should be removed as a means of clearing traffic in central London.
- In addition, TfL has the power to alter PHV licensing requirements and can therefore indirectly limit the number of PHVs, while also encouraging best practice.
- For example, a very small number of PHVs are wheelchair accessible (e.g. Uber launched its wheelchair service Uber WAV in May 2016 with 55 vehicles in the new fleet and plans to expand to more than 100 in the "coming months"[47]. 100 vehicles out of 30,000 = 0.33%).
- TfL could introduce a higher licence fee for PHVs which are not wheelchair accessible (thereby encouraging the uptake of wheelchair accessible vehicles and reducing those without), with the

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[43] https://pbs.twimg.com/media/CpFRI5jWcAA0_vv.jpg

[44] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/302409/vls-2013.pdf

[45] In August 2016, the LTDA commissioned YouGov to undertake a survey of Londoners to ascertain their view on transport in London. Total sample size was 1037 adults. Fieldwork was undertaken between 23rd and 25th August 2016. Statistics available on request.

[46] http://content.tfl.gov.uk/private-hire-vehicles-london-act-1998.pdf

[47] http://www.bbc.co.uk/news/technology-36256581

additional funds raised being used to subsidise transport for disabled people and reduce fares (similar to the Freedom Pass).

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

- Car clubs are relatively effective in cutting down car ownership, but have less of an impact on car usage.
- Car clubs also encourage people to use cars instead of public transport, which is counter-productive to reducing congestion.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

- Professor Begg found that over the last 50 years, "bus journey times have increased by almost 50% in more congested urban areas".[48]
- He added that "London bus speeds have been declining faster than anywhere in the UK over the last few years" and that the decline in average bus speeds is "more than five times" any other UK city.
- Besides the increasing number of vehicles (mainly delivery vans and PHVs) on the capital's roads and decreasing road space, bus journey times are also being hit by the inefficiency of current bus routes.
- This issue of bus deployment was raised by Val Shawcross at the Transport Committee hearing in July, noting that TfL needed to do "some serious redesigning of the buses in central London".[49]
- She claimed that too many routes are coming into central London during off-peak hours, clogging up the roads with half empty buses.
- She noted that there were was more demand for buses further out [in London] and TfL would look at "combing the buses out" of [central London] alongside more "interchanges" and "turn-backs" in order to reduce congestion.
- Professor Begg highlighted how bus drivers must stick to their routes and therefore cannot avoid congestion. As a result, the routes should be changed for peak and off-peak times in accordance with demand.
- Buses that come into the centre from the suburbs should be limited to peak times in the morning and evening or scrapped entirely.
- Introducing "turn-backs" – suggested by the Deputy Mayor – would help to free up road space, remove unwanted buses from central areas and increase availability in the suburbs where they are most needed.
- In addition, with the introduction of the 'Hopper' ticket, this could be achieved at no extra cost to the passenger.

[48] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

[49] https://www.london.gov.uk/transport-committee-2016-07-13

Providing new road infrastructure

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

River crossings

- As noted in response to Q8, London is in dire need of new river crossings in the East, with currently 23 fixed river crossings west of Tower Bridge, but only two east of it[50].
- This lack of choice leads to huge daily delays for those coming into central London from the east; delays that vastly exacerbated every time the Blackwall Tunnel closes: *New Civil Engineer* magazine claimed this occurred nearly 1,500 times in 2010.[51]
- In 2012, TfL estimated that the lack of choice led to "delay and congestion for drivers" and suggested that "at the Blackwall Tunnel this is on average 20 minutes per vehicle in the morning peak".[52]
- In 2016, the situation is much worse. Many LTDA drivers live in the East and have said that northbound there are three mile queues every morning from 06.00 and two-mile queues every afternoon from 15.00.
- These queues can be as much as 10 miles long when the Tunnel is closed[53].

Key junctions

- Any look at new road infrastructure must include a review of key junctions in London; many of which could be adapted to alleviate congestion. For example:
    - Lower Grosvenor Place (SW1) J/W Buckingham Palace Road. Removing ATS on the left turn and replacing it with a pedestrian (Pelican) operated phase would allow free movement unless someone wanted to cross.
    - The same scenario would reduce congestion at Proctor Street WC1 J/W High Holborn.
- There are other key junctions where a banned turn, coupled with minor works, would prove highly beneficial.
    - Blackwall Tunnel Northern Approach J/W Zetland Street E3.
    - Aspen Way E14 J/W Upper Bank Street
- The LTDA would be able to supply more key junctions to the Committee as required.

[50] http://www.publications.parliament.uk/pa/cm201415/cmselect/cmtran/714/714.pdf

[51] https://www.newcivilengineer.com/news/transport/blackwall-tunnel-upgrade-set-for-early-completion/8622119.article

[52] https://consultations.tfl.gov.uk/river/crossings

[53] http://www.standard.co.uk/news/transport/blackwall-tunnel-closed-delays-to-last-the-rest-of-the-day-as-drivers-stranded-for-hours-a3255696.html

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

- The vast majority of the decline in car usage in London over the past twenty years has been amongst non-commercial drivers.
- These drivers only use the car as a last resort, as result of: a lack of parking, traffic, the cost of running a car, the cost of using the road (C-Charge etc) and environmental concerns.
- Commercial vehicles are the only ones that rely on using the road; new road infrastructure is vital for them, but will make little difference to non-commercial drivers and will therefore have a negligent impact on their car usage.

16. How should new road infrastructure be funded?

- As London's transport regulator, TfL should be responsible for funding smaller schemes, such as changes to key road junctions.
- However, central government should be responsible for larger, more strategic schemes, such as river crossings.

Maximising available road space

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

- TfL's Lane Rental Scheme (TLRS) has been relatively effective in minimising road disruption by utility companies, but unplanned disruption has continued to rise since the scheme's introduction.
- In 2015, the 2,663 additional hours Londoners spent in traffic due to unplanned roadworks was more than double the 2013 figure[54].
- The costs charged for usage by TLRS need to be increased, as currently the fines are merely factored in by utility companies as part of the scheme; thereby undermining the deterrent.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

- As noted in response to Q2, the construction of cycle superhighways has led to reduced road space in central London, with the Greener Journeys report finding that in some areas, cycle superhighways (CSH) saw road capacity reduced by 25%.[55]
- This was contested by TfL's Managing Director for Surface Transport Leon Daniels, who said that in some areas "one lane out of four" has been reallocated to create segregated cycle routes" – a reduction of 25%.[56]

[54] Figures from the London DataStore, 2015 figures (1,005 planned, 2,663 unplanned_ compare with 2013 figures of 305 and 1,634 respectively).

[55] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

[56] https://www.theguardian.com/uk-news/davehillblog/2016/jun/15/london-road-congestion-causes-effects-and-what-happens-next

- In particular, LTDA members have noted the detrimental effect of the CSH on Victoria Embankment Eastbound and on Highway West bound.

Active traffic management

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

- It is hard to assess the impact of the Road and Transport Enforcement Officers without data on the work they have done.
- The Team is supposed to address traffic problems at congestion hotspots in London, but we have witnessed little evidence of this.
- Last November, former Mayor Boris Johnson MP announced that the number of Road and Enforcement Officers would be doubled to 80 by spring 2016. However, this is just a drop in the ocean and taking into the account the continuing decline in traffic speeds and the increase in journey times, we can surmise that the Enforcement Team has had a relatively tiny impact.

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Assembly Transport Committee Congestion Investigation

Submission from London Chamber of Commerce and Industry

30th September 2016

Introduction

London Chamber of Commerce and Industry (LCCI) is the largest capital-focused business advocacy organisation representing the interests of over 3,000 companies from small and medium-sized enterprises through to large, multi-national corporates. Our member companies operate within a wide range of sectors across all 33 London local authority areas – genuinely reflecting the broad spectrum of London business opinion.

As the voice of London business we seek to promote and enhance the interests of the capital's business community through representations to central government, the Mayor and the GLA, Parliament and the media, as well as relevant international audiences. Through member surveys and commissioning research, LCCI seeks to inform and shape the debate on key business issues.

Congestion, and related issues of safety and pollution, are increasingly in the public eye and featured heavily during London's mayoral campaign earlier this year. It goes without saying that congestion is bad for business. However, in responding to this consultation, we want to highlight the need for balance in discussions, particularly when reflecting on the role that road freight plays – or is perceived to play – in the debate. Businesses and residents rely upon efficient freight logistics to meet the demands of a modern 24/7 city. Our restaurants, offices, shops, and tourist attractions could not operate without reliable access to the goods they need to meet the demands of their customers. New homes and offices cannot be built without the delivery of construction materials. Most of this comes by road. As the population of London grows over the next decade, traffic levels will also rise, exacerbating London's existing congestion problem.

In this context, businesses are keen to explore different options to achieve a sensible balance between public and commercial needs as we seek to tackle congestion in the years and decades to come.

Consultation Questions

1. **How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type, and/or location of congestion?**

2. **What are the key causes of these changes in congestion?**

18. **What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?**

On current trends, London's population will reach 10 million by 2030, up from 8.6 million today. That would make the Greater London area a 'megacity'. As London grows, so too is the level of traffic. Indeed, we understand that TfL estimate a 60% increase in road congestion by 2031.

In this context, it is vital that London's limited road space is utilized as efficiently and effectively as possible. It is for this reason that LCCI has long called for an economic impact assessment of Cycle Superhighway schemes. Cyclist and pedestrian safety is critical, and individuals who choose

alternative means of travelling ease pressure from London's already overcrowded transport network. However, Cycle Superhighways - particularly during their construction phase - can place unreasonable pressure on an already busy, congested road network through reducing capacity and increasing travel time in central London. We believe there needs to be a deeper exploration into semi-segregated cycle lanes during peak hours, rather than permanent infrastructure, in order that a balance can be struck between the needs of a minority of Londoners who chose to cycle daily and the majority of London road-users.

There also needs to be a radical overhaul of the management of commuter rail services into central London. Bus replacement services increase traffic in the city during peak hours, where the roads are already congested. Such services would have less need to operate if individuals were able to rely on an effective, reliable commuter rail service. LCCI backs the devolution of responsibility to manage commuter rail services to TfL as soon as possible.

There is also a strong case to assess of the role and function of the vans operating in central London. Unlike with HGVs, there is currently very little understanding of what smaller vans are delivering or what services they are offering. Improving our picture of this activity would help decision-makers come to balanced, evidence-based decisions to address congestion whilst meeting the capital's economic needs.

3. What impact does congestion have on Londoners, the city's economy and its environment?

The capacity issue faced by users of the Rotherhithe and Blackwall Tunnels serves as a perfect example of the impact congestion has on the city's economy. The Blackwall Tunnel and its approaches are amongst the most congested roads in the city, and London businesses are all too aware of the employee work time that is lost when these tunnels are closed. The lack of alternative routes nearby causes long traffic diversions and travel delays with significant costs for businesses. According to TfL estimates, congestion around the Blackwall Tunnel and its approaches costs motorists £17.5 million per year.

Longer journey times and congestion lead to delays, increased fuel consumption and therefore greater cost – impacting on the local businesses, and causing an environmental impact. Feedback from LCCI members supports the evidence that journeys are taking much longer now than they did two years ago. This has a profound impact upon businesses and operating costs, making London a less attractive city in which to operate.

5. How effective is the Congestion Charge? How should this scheme be modified?

According to Professor David Begg, Professor of Economics at Imperial College, the London Congestion Charge achieved its objective of cutting traffic volumes in the Charging Zone by 20% when introduced in 2003, but this has since been "more than cancelled out as road space has shrunk in central London through road works, cycle superhighways, growth in delivery vehicles and private hire".[1]

TfL should revaluate the purpose of the congestion charge - whether economic or environmental - in order to assess whether its achieving its aim of reducing congestion in the capital.

[1] http://www.greenerjourneys.com/wp-content/uploads/2016/06/Prof-David-Begg-The-Impact-of-Congestion-on-Bus-Passengers-Digital-FINAL.pdf

6. To what extent would a usage-based road pricing regime help reduce congestion?

When considering the rates of road charges, there needs to be strong consideration of the economic value of journeys made in central London. The economic value of an individual driving into central London - where viable and accessible alternatives are available - is far smaller than that of a HGV delivering essential goods and so decision makers should consider how to tackle the problem of private journeys, not just HGVs.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

Congestion and the environment has become a key issue for London businesses, with 66% of business leaders supporting an ultra-low emission zone, requiring all vehicles driving through the current congestion charge zone to meet stricter emission standards or pay a daily charge.[2]

Ensuring that environmental standards are improved in the capital is of the utmost importance. However, a balance needs to be struck which allows businesses - in particular smaller businesses - sufficient time to adapt to changes, or new standards, before they are introduced.

Regarding the ULEZ and T-charge, we believe that 2020 is the right date for introduction, and should not be brought forward. There must be sufficient information on how to comply.

On the issue of how charges might affect congestion, it must be remembered that vital delivery and servicing trips cannot be undertaken by public transport, and the introduction of road charging will not curtail the consumer demands which create the need for those commercial journeys in the first place. Introducing the ULEZ and T-charge is therefore unlikely to play a significant role in reducing the overall level of commercial and freight traffic in the capital.

8. What would be the benefits and drawbacks of these other interventions?

- **Tolling for river crossings or other major infrastructure**

  The case for new river crossings to relieve congestion in East London is overwhelming, and additional crossing should be constructed as soon as possible.

  LCCI accepts that charges may be required to fund the infrastructure (as business accepts paying a Business Rates Supplement for help fund Crossrail). However, any user charge must be proportionate and sensitive to the concerns of local residents and businesses. If a charge is introduced, it should be designed to reflect the flexibility, or otherwise, of user modes. Business traffic (particularly freight) is less capable of shifting from road usage to rail than private car users, and therefore should not incur as high a usage fee.

  By the same token, LCCI would argue that the toll should take into account the economic value of different journeys. Freight journeys have a higher economic benefit than leisure journeys, and therefore should not incur a higher charge. LCCI believes that if tolling is introduced in a proportionate manner it could help with meeting the costs of whatever new river crossings are finally built.

[2] ComRes survey for LCCI of 506 London businesses, February 2016

- **Workplace Parking Levy**

  LCCI would require further details before formulating a view on this. If the intention is to deter workers from driving into the centre, then an evaluation would need to be undertaken of its likely success, given that the existing charges are not significant enough a deterrent already. LCCI would also wish to better understand whether the cost would be absorbed by individuals or by business.

- **Devolving Vehicle Exercise Duty to London**

  This proposal should be explored by the London Finance Commission as part of a wider package of fiscal powers devolved to the capital. However, we would expect any positive view by the LFC towards recommendation would also have consider practicalities around the setting and application of this tax.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Enabling deliveries at other times of the day has a vital role to play in unclogging London's congested roads. We know that 67% of businesses do not receive deliveries outside of normal business hours.[3] The London Lorry Control Scheme should be fully reviewed in order to liberate London's night-time delivery opportunities and TfL, alongside City Hall, should work with businesses to improve their understanding of the retiming opportunities that already exist. Moving deliveries from the 7am-11am morning-peak, where freight vehicles account for 25% of traffic, could help businesses operate more efficiently by avoiding congestion and contributing to the overall congestion in the capital.

Consolidation also has a vital role to play in tackling London's congested roads and reducing the number of unnecessary journeys made into central London. However, consolidation centres often struggle to be financially independent and regularly require ongoing public funding. Consolidation already takes place in the supply chain so it is important to ensure that those already maximising the efficiency of their operation are not required to split loads via new consolidation centres.

Nonetheless, further opportunities to consolidate deliveries must be explored in order to influence behavioural change. For example, businesses within multi tenanted office buildings, will be placing individual orders for all the goods and services they require, leading to a number of independent freight journeys coming and going during the day. Approaching their servicing needs differently, and procuring their goods collectively, would not only contribute to reducing congestion but also achieve financial savings.

Further steps should be taken to explore how businesses and consumers can be incentivised to change their behaviour and use their procurement power to contribute towards reducing congestion in London.

Finally, with 90% of all freight in the capital already moved by road, we need to consider alternative opportunities to move good and services around the city. London needs an integrated freight strategy that makes best use of road, rail, and river resources. The Thames is an underutilised superhighway which flows through the heart of our capital, and more must be done to maximise its potential. The Mayor should establish a river commission to explore what further opportunities the Thames has to offer, both in terms of moving freight and passenger services.

[3] ComRes survey for LCCI of 506 London businesses, February 2016

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

The population of London is rapidly growing, and so too is the demand for goods and services. This means that more freight vehicles will be required in order to meet this demand and keep our city running 24 hours a day, 7 days a week. Population growth will directly lead to an increase in congestion. Whilst a number of initiatives, such as retiming and consolidation, have an important role to play in reducing congestion, they do not provide a permanent solution.

New road infrastructure is vital if we are to meet the needs of our capital city. The finite road space in central London has already been reduced by schemes such as the cycle superhighways, so it is more important than ever to consider what new road infrastructure the capital requires in order to balance the business needs of the city against the environmental and safety considerations.

The capital needs more fixed river crossings in East London. The lack of fixed river crossings east of Tower Bridge has hampered economic development for decades. The combination of over-congested, low-resilience and archaic road river crossings in East and South East London means that an important area of the capital is relatively inaccessible compared to other parts of London. This has held back the area's economic development. Whilst an additional tunnel at Silvertown is vital to relieve congestion at the Blackwall Tunnel, one new road tunnel alone is not enough to meet the capital's needs. Proposals for road crossings at Gallions Reach and Belvedere (and not just public transport or pedestrian/cycle crossings) should be front and centre of the Mayor's package of new river crossings to the East, and must not be kicked into the long grass. As TfL itself has spelt out, vital delivery and servicing trips cannot be undertaken by public transport or entirely on the River Thames.

16. How should new road infrastructure be funded?

LCCI accepts that charges may be required to fund the infrastructure and to reduce the likelihood of further delays. However, any user charge must be proportionate, and sensitive to the concerns of local residents and businesses.

LCCI would also argue that the toll should take into account the economic value of different journeys. Freight and fleet journeys have a higher economic benefit than leisure journeys, and therefore should not incur a high charge. LCCI believes that if tolling is introduced in a proportionate manner it could help with meeting the costs of new road infrastructure.

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London Councils' Response

London Assembly Transport Committee: Investigation into traffic congestion in London

London Councils represents London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.

Q1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

A number of the boroughs that are able to monitor congestion levels confirmed that there has been a noticeable increase in the levels of congestion in London, especially since the 2008 financial crash. An increase in Heavy Goods Vehicles (HGVs) and Light Goods Vehicles (LGVs) is one of the biggest changes to the congestion in London. Another point identified is the large increase in Private Hire Vehicles (PHVs) (which is addressed later in this document). Another key factor in the increase in congestion identified by many of the boroughs is the increase in population in London, and the strain this is putting on the road network.

Q2. What are the key causes of these changes in congestion?

The causes of the changes to congestion highlighted above are numerous. The key factors in the increase in HGVs and LGVs have been the increase in construction work in London, and the increase in e-commerce, and the corresponding level of journeys by both HGVs and LGVs these two factors create. The increased number of PHVs could be put down to population growth and proliferation of mobile-based vehicle hire business models, for instance Uber. This increase in population, coupled with the increasing percentage of people choosing to cycle, has contributed nominally to congestion. This is mainly due to the building of separate cycle infrastructure on roads, but also in some instances the larger number of cyclists, which could slow traffic on smaller roads as there is a lack of space for overtaking. Despite this, in the long-term, increased numbers of cyclists will actually contribute to lesser congestion as more people decide to ditch private vehicles. More active travel will also bring a number of wider benefits to society, including reducing air pollution, and reduced obesity ill health associated with inactivity.

Q3. What impact does congestion have on Londoners, the city's economy and its environment?

Traffic congestion imposes costs on Londoners in terms of delays in journey times; the health effects of poor air quality, noise pollution, and community severance. The annual INRIX Scorecard (2015), a report which analyses and collates transport data in over 100 cities across the world, shows that London continues to be one of the most congested cities in the world. Congestion has a significant impact on cities — both on businesses that drive economic growth, on individuals' quality of life (for instance health), community cohesion, and on the environment. Congestion problems involve extra travel time and/or unpredictable arrival times and are caused by an imbalance between travel demand and transportation capacity. London is the UK's most congested city. Drivers spent more than 250 hours idling in traffic in 2013, which is double the UK average – and this is set to increase to 299 hours

by 2030, equivalent to 40 working days a year. Although less than a third of Londoners commute to work by car, the cost of living and the value of time for the capital's 1.4 million car commuters is at such a premium that in 2030, traffic congestion has been calculated to cost London £9.3 billion, an increase of 71 percent from today (approx. £4.4bn), costing each car commuting household more than £4,000 a year by 2030[1].

London's population is growing, and large increases in the absolute numbers of vehicles on the road are expected by 2030. This has led to estimated increases in annual hours wasted in congested traffic of 19% in London between 2013 and 2030. This filters through to higher forecasted economic costs to households, but also higher environmental costs from CO2 emissions. The fuel that is consumed while stationary in traffic results in higher emission of greenhouse gases and pollutants, which leads to poorer air quality. Boroughs are aware of this problem, and are actively tackling it, for example through the promotion of walking, cycling and public transport use.

Poor air quality generates a burden to both mortality and morbidity, with a general consensus around the UK Committee on the Medical Effects of Air Pollutants (COMEAP) estimate of 29,000 attributable deaths brought forward because of exposure to ambient PM2.5 air pollution each year in the UK. According to research by King's College London, the figure of deaths brought on by long term exposure to air pollution in London is nearly 9,500 per year[2]. Reported morbidity effects vary greatly in severity, from impacts that are seriously debilitating, such as chronic or obstructive pulmonary disease (COPD or cardiac events, to those that are less serious individually but which affect a larger number of people, e.g. 'restricted activity days' or 'symptom days'. The costs of these impacts, for welfare, healthcare and productivity, are considered to be large[3].

Q4. What can London learn from other cities in its effort to reduce congestion?

There is no one city-wide strategy that can be adopted to reduce congestion and its impacts and there are few cities that compare to London in terms of its size, streets, complexity and society. Despite this, lessons can still be learnt from London's similarities to other global cities, and applied to different contexts. We encourage the Mayor and TfL to learn from the experiences of other international and UK cities, in the way that they restrict traffic movement, promote walking and cycling, and have integrated public transport; for example cities like Oxford. Further abroad, there are a series of cities looking to restrict car usage, by creating routes and places where walking and cycling is the method of transport opted for. For example, Oslo in Norway is planning to permanently ban all cars from the centre, and replace 35 miles of roads with bike lanes, while Madrid are looking for a modal shift from driving to walking by again banning cars from certain areas. These are just a few examples from a number of innovative projects from around the world[4]. There are also many examples of innovative policies to restrict car use in cities such as Copenhagen, Helsinki, Milan and Nottingham (as referenced in more detail in the London Borough of Hackney's submission).

Careful attention should be paid to previous outcomes and emerging outcomes from relevant EU projects and publications and from advice of the London European Partnership for Transport (LEPT).

Q5. How effective is the Congestion Charge? How should this scheme be modified?

According to official figures and data, there has been a 53 per cent reduction in car use in the congestion charge zone since its inception in 2003. This can also be attributed to improved public transport provision. Levels of road traffic in central London have fallen for much of the last decade, but have increased for the last two years, and this is thought to reflect the increasing population and economic growth post-recession. There have also been large increases in truck (LGV) traffic in central London, which could be attributed to the rise in e-commerce, and huge

[1] CEBR & INRIX (2014) The future economic and environmental costs of gridlock in 2030
[2] Understanding the health impacts of air pollution in London (2015)
[3] Royal College of Physicians (2016) Every breath we take: The lifelong impact of air pollution
[4] UK Business Insider

increases in the amount of roadworks in this area (362 per cent)[5]. This would suggest that there needs to be a new focus on ensuring that this trend isn't long-term. Boroughs suggest that the Congestion Charge's effectiveness has declined over time. Its benefits have been eroded because traffic is changing away from private cars, which were the focus of the Congestion Charge, to commercial vehicles and vehicles for hire, which have increased substantially. Technologies are also changing with PHVs introducing the concept of a variable cost model based on predicted times of higher congestion and this should be monitored. The introduction of the night tube and the Elizabeth line that will greatly affect the central area and thus the Congestion Charge should be tailored in response

Q6. To what extent would a usage-based road pricing regime help reduce congestion?

London Councils would like to work with TfL to identify how road user charging could be developed to tackle congestion as well as improve air quality. Road user charging could be an effective way to tackle traffic congestion and fund road maintenance in certain contexts. A lot of research from organisations such as the OECD, Friends of the Earth, and Deloitte, shows that road pricing can help to reduce congestion when planned correctly. TfL and DfT need to explore the potential technologies that could assist with more intelligent road pricing systems. While there is some fairness in charging more according to distance travelled, and this might help with public acceptability of road user charging, there is an incongruity with charging more for a long journey on uncongested roads than for a shorter journey in heavy congestion. A system that is aware of these issues would need to be developed.

London Councils acknowledges the potential issues of displacement. Given recent trends (highlighted in this response) it will be important to focus on reducing PHV, HGV & LGV and coach journeys alongside private vehicles.

Q7. How might the Ultra-Low Emission Zone (ULEZ) and Emissions Surcharge affect congestion levels?

London Councils strongly support the ULEZ and Emissions Surcharge. Air pollution is a huge problem in London, and is exacerbated by high levels of congestion. Air quality in London needs to be a priority, and specific policies like the ULEZ and Emissions Surcharge are necessary to addressing this. It makes sense to coordinate the expansion of the ULEZ so that there is a unified plan to tackle congestion as well as air quality. It has been noted by a number of boroughs that if continued improvements in vehicle efficiency and the development of electric and ultra-low emission vehicles continue, then the ULEZ will not be an effective anti-congestion measure. While this is true, it should be expected that the policy will adapt and evolve over time in connection with these changes, ensuring it remains effective. More information is needed by the boroughs on the impacts of the potential boundary for the ULEZ.

Whilst there is widespread support for the ULEZ in general, there is concern from boroughs about the potential north/south circular being used as a boundary, given the fact it cuts through a number of boroughs, and also the nature of the road in the south. This policy, although focused on central London, will also impact the outer London boroughs, with many road journeys made for commuting and leisure along the west/east axis as well, therefore supporting policies, such as improved and cleaner public transport provision is essential. London Councils calls on TfL and the Mayor to ensure detailed modelling is conducted to discover the most affective route for the boundary of the ULEZ, what the next steps in the long term should be for improving air quality in London, and to share this information effectively with boroughs.

London Councils strongly supports an increase in low carbon public transport (for example electric and hydrogen buses) operating on routes beyond central and inner London, to fully spread the benefits of the ULEZ and Emissions Surcharge. This would also need to address the weaker provision of public transport in certain areas of outer London.

[5] London First (2016) London Congestion Trends

Q8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure – There is some support from a number of boroughs for road tolling, and is considered by some an acceptable way of funding new infrastructure. It might be beneficial for the revenue raised in this way, to be allocated to significant transport investments in the sub-regional area concerned, providing more of an incentive to support this measure.
- Workplace Parking Levy – London Councils Executive has considered the introduction of a workplace parking levy as one of many options for funding new infrastructure in the capital. We note that Nottingham City Council has introduced a workplace parking levy which is ring-fenced for extensions to the tram system, the redevelopment of the city railway station and the running of an accessible bus service for residents. The same powers are already available to boroughs. Understandably there could be concern from business about the introduction of such a scheme, and we would encourage learning from the Nottingham scheme, for example issues with the 'cliff-edge' nature of a boundary based charge, with a gradually reducing zonal charge suggested. A number of boroughs voiced their concern with this policy, believing it could have negative impacts on businesses, and therefore employment opportunities.

Q9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

London Councils supports efforts by boroughs and TfL to reduce the number of goods vehicles on London's roads. As well as congestion and air quality impacts, the safety of cyclists and pedestrians is a major factor in this work. London Councils delivers the London Lorry Control Scheme (LLCS), which restricts the movement of heavy goods vehicles over 18 tonnes maximum gross weight, at night and at weekends on specific roads. The controls help drivers and operators of goods vehicles to understand their responsibilities when driving in London. We also support TfL's Freight Operator Recognition Scheme (FORS) in improving vehicle safety.

Boroughs have been active in encouraging businesses to re-time deliveries to take place outside of peak hours where possible, and encouraging the consolidation of deliveries for the 'last mile'. For example, the freight consolidation service in the borough of Hackney and Islington, and the Low Emissions Logistics project being run by Wandsworth, Southwark, Croydon and Lambeth. The Mayor and TfL could help boroughs to establish consolidations schemes. This can help to reduce pollution and congestion, as well as having other benefits. Suppliers have lower costs as a result and have passed these onto the boroughs by way of rebates[6].

In central London, we support greater use of the River Thames for the movement of freight and people, and encourage TfL and the Port of London to facilitate increase usage of the river where appropriate. Additionally, a number of boroughs highlight the need for an increase in the number of parcel drop-off points (especially important in light of post office and delivery office closures). The use of planning powers to require consolidation for new development and /or restrict servicing and deliveries to outside certain times could also be considered.

Behavioural change has been seen as a key driver in reducing congestion. London Councils form part of the Retiming Deliveries Consortium (RDC) and actively engage with the industry to address barriers to delivering goods and services outside of peak hours. Many business do not consider deliveries to be a problem in London at all, mainly because they order their supplies and they arrive with very little problem. There is no connection for them between their own behaviour and the wider issues faced by Londoners. In addition, suppliers offer an increased level of service such as one hour delivery etc. which simply increases congestion but is not really necessary. A communications programme focussed on behavioural change for consumers would help to educate and raise awareness of the overall problem.

[6] London Councils

Q10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

London Councils is aware of concerns from boroughs about the number of minicabs (private hire vehicles) operating in London. We support measures to ensure the private hire industry is well-regulated and maintains high standards in driver training and customer care. TfL needs to better understand the demand for private hire vehicles and match this to locations to avoid minicabs and taxis driving around looking for business, which worsens traffic congestion and air pollution.

There has been an increase in the number of minicabs and private hire vehicles in London, but research shows that these mainly operate outside of the CCZ times. Private hire vehicles increased by 12,500 (this equates to the highest relative growth rate among all vehicle types, at 7.68%) between 2012 and 2015[7].

Q11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

The promotion of car clubs was identified in the Roads Task Force report in 2013 as one of a number of demand management measures which could reduce overall car dependence by making access to cars more flexible, thereby reducing pressure on road space and encouraging sustainable transport. Car clubs were recognised as a key tool in providing for Londoners' urban mobility needs by offering a realistic and economical alternative to private car ownership. They could play an important role in reducing the need to have a car because they offer an alternative to conventional car use models and can reduce habitual car use while still enabling access to a car for essential journeys. The 2013/14 Carplus Annual Survey calculated that for each round-trip car club vehicle in London, 5.8 cars were removed from the road as a result of car club members selling a car[8]. More data is needed on the effect car clubs that operate all journey types (round trip, floating & fixed one way) have on congestion and car numbers in London. It is also important to note that car clubs will have different impacts in different parts of London, and planning should be done with a local and sub-regional input.

It is important that this expanding market is supported where it is seen to be working, by encouraging the development of both on and off street car club infrastructure. Car clubs could be encouraged through the provision of dedicated parking spaces via section 106 agreements in new developments. Providers need to work with boroughs to increase the network in areas where demand will be greatest to improve the marketing of car clubs, which would require more regular data about usage; that all models of car club are supported by boroughs where they are proven to work in both reducing congestion and minimising model shift away from walking, cycling and public transport.

With the stated commitment of car clubs to delivering 50 per cent ultra-low emission vehicles in their fleet by 2025, it is crucial to ensure that the charging infrastructure is developed to ensure that this is possible, and that car clubs contribute towards cutting air pollution. The Go Ultra Low City Scheme (GULCS) is one such example of funding being used to develop charging infrastructure for car club electric vehicles.

Q12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

We would be cautious of any attempts to reduce London's bus provision. We acknowledge that greater efficiency in the provision of bus services could be achieved with more strategic planning. This requires borough engagement as well as local and sub regional planning, especially for growth areas and areas of poor accessibility. We welcome TfL's current review of bus service provision to the capital's hospitals, and hope that TfL and the Mayor of London will undertake a wider review of bus provision as a consequence of the

[7] London First (2016) London Congestion Trends

[8] Carplus (2014), Annual Survey: London, p25. As only round-trip car clubs operated at the time of the survey, these findings apply to round-trip car clubs.

pedestrianisation of Oxford Street. The outer (and especially southern) boroughs have less public transport provision, and there is scope to grow the bus and tram networks here, whilst more efficient routing in other areas is needed. Whilst buses can contribute to congestion, private car usage is a far greater contributor, and the main focus needs to be to encourage people to swap their car for the bus, to tackle congestion and improve their health. With Crossrail, and other rail terminus and service improvements, the bus network needs to be improved in between these areas, and areas of low penetration should be addressed.

Q13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

This is a crucial part of reducing congestion in London, as London's population grows. With pressure on public transport capacity, improving and expanding the public transport offering and encouraging walking and cycling becomes even more important.

London Councils supports the improved and increased provision of cycle infrastructure, as we believe it is key to encouraging a greater shift to cycling across London, which will have positive impacts on air quality and congestion in the long term. We support Cycle Superhighways, where planned appropriately and believe they can benefit from further development to ensure they maximise their potential to deliver safety. TfL needs to continue to provide the infrastructure (for example bicycle parking spaces) to encourage cycling, as well as information that encourages active travel modes. This could include providing more information at tube and bus stops on walking times between various locations, as well as more signage to the nearest available bike hire site. Improving streetscapes and urban environments to make places more attractive, and therefore encouraging walking is important (for example, by providing more green infrastructure and pedestrianised areas) as well as improve air pollution. The new Mayor's focus on a holistic approach to street design (inclusive, safe and accessible) is welcomed. London Councils supports the objective of encouraging modal shift to more active transport, as well as public transport.

Improved bus and tram reliability and more real-time information whilst waiting for and undertaking a bus or tram journey is important to encourage a shift to bus and tram use. Londoners need to be able to rely on the public transport provided, so more needs to be done to ensure the reliability of bus services, especially in areas where the alternatives are limited (especially in some outer London boroughs). Londoners also want to feel safe, especially at night, when using public transport or walking. The night tube might help reduce private hire vehicle and taxi trips at night, which although not a peak time, could help improve congestion in some areas.

London Councils have been involved with a number of projects on modal shift, for instance the PTP Cycle which is a project co-funded by the Intelligent Energy-Europe Programme granted by the Executive Agency for Small and Medium-sized Enterprises (EASME). PTP aims to influence people's decision making by providing information directly to the individual on sustainable mobility options through a one to one discussion with a PTP Adviser. The resulting information pack is then hand-delivered, leading to a greater likelihood of behaviour change than a one-size-fits-all-approach. A report on the project notes that over two phases 7,193 PTPs were delivered to residents in the London borough of Haringey. In phase 2 the follow-up survey revealed that 16.7% of residents in the project area changed their travel behaviour to a more sustainable mode of travel as a result. This dissemination of information on sustainable alternative modes of transport could be encouraged more.

It is important to bear in mind that this issue isn't just relevant to central London, but can also apply to situations like the 'school run', which is a key cause of congestion at peak times in a number of areas, again more likely to be in boroughs where car use is more heavily relied upon. The STARS (Sustainable Travel Accreditation and Recognition for Schools) will develop a pan-EU accreditation scheme and a peer-to-peer engagement programme to get more children cycling to school in 9 EU cities, including the London Borough of Hackney. The project aims to attain a 5% modal shift from car to bike for journeys to school, and engage over 270 primary and secondary schools across Europe. In the interim review of the projects' first year, it showed that car journeys to primary

schools fell by 10.8 per cent with cycling increasing by 12 per cent. In the secondary schools taking part, the modal shift to 'active modes' (walking and cycling) grew by 6.9 per cent[9].

London as a city has different traffic profiles in different areas and we encourage continued borough engagement by TfL to select the best options for encouraging modal shift. Open sourcing of all transport and travel related information to enable IT / App development is a key action for TfL and the Boroughs.

Q14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

There are a number of theories which suggest that the best way to reduce congestion is to improve public transport. The move of people onto public transport needs to be done at high levels which ensure that it can be provided affordably. Building additional road capacity often leads to it being consumed by additional demand for road space. But there could be a need for widening and improving certain routes in London to remove pinch-points and bottle necks and ensure a safer and more effective traffic flow. There are also strong arguments for the provision of new and improved river crossings in east London to significantly improve connections between areas north and south of the river, supporting jobs and business growth. London Councils supports this in principle and has been doing so for some time, but any proposal would be judged on its merits. We strongly support the feasibility work TfL is undertaking to explore river crossings in the east of London. Whilst road crossings are important to improve the resilience of the south east London road network, we believe they must incorporate safe and viable walking and cycling crossing options. Bus routes should also be scheduled to use the crossings and we support TfL in exploring the inclusion of public transport options.

In areas of major regeneration and growth opportunity, key transport links, such as the A13 trunk road, a focus on better design and on improved resilience measures must be ensured as part of a wider package of investment.

Q15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

There is strong evidence that new road links can induce trips onto the network meaning that any congestion relief provided by such roads can be short-lived. Development projects could provide opportunities for new and adequate provision of cycling and walking infrastructure, and freight consolidation. Where new roads are the appropriate solution, design aspects could help ease congestion issues and discourage the use of cars, rather than provide more road capacity. Issues such as freight consolidation and deliveries to residential addresses should be 'designed-in' from the beginning.

Q16. How should new road infrastructure be funded?

Funding infrastructure is important for London to accommodate its population growth. Sources of funding should be a mixture of government, TfL, borough, developer contributions, and business contributions. We encourage the exploration of other options to create new ring-fenced funding streams such as the workplace parking levies and road-charging, for example.

The road maintenance budget for councils is inadequate. Only 5 per cent of the road network in London is managed and overseen by TfL, whereas the overwhelming majority of the road network, 95 per cent, is managed by the London boroughs. Funding for London's highway authorities does not fully recognise its population and the fact that on average roads are 40 per cent more densely trafficked than in other UK conurbations. Resultant congestion not only causes disproportionate damage to the capital's road network, but has a negative impact on the economy and environment. London Councils has asked that the government takes account of these factors when allocating road maintenance funds to London in future Spending Reviews.

[9] STARS (2015) Interim Review (Monitoring and Evaluation Report for 2013-14)

Theoretically, there is potential for road-tolling to cover new road infrastructure, but any such proposals would need to be laid out in detail to be considered, and planned at a pan-London level to avoid inequalities in travel costs to London residents.

Q17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

The lane rental scheme has been highlighted as a successful means of reducing roadworks, and creating income. At the moment, lane rental is only in operation on a small proportion of roads, the Transport for London Road Network (TLRN). The lane rental scheme was introduced on the TLRN in 2012 and currently applies to 56% of the TfL road network. London Councils believes that this has been effective in managing road-space and ensuring that necessary works are undertaking in a timely manner whilst reducing highway occupation and minimising congestion. These measures would be made more effective by rolling them out across London so that borough roads (which account for 95% of the roads in London) can also utilise this proven control. Not only does this reduce congestion, it also provided revenue which can be used to improve the road network. London Councils urges DfT to allow the extension of Lane Rental to further traffic-sensitive locations at the most traffic-sensitive times of day across the whole of Greater London i.e. allow schemes to be developed for the most important borough roads too, and would appreciate the future assistance of GLA and TfL in exerting more pressure on DfT to do this. The legislative powers for boroughs to do this already exist but authorities require DfT approval to operate a Lane Rental scheme. DfT have only approved two pilot schemes so far, TfL and Kent CC. They have committed to review the results of both schemes as well as the impact on utility companies before approving further schemes. Any DfT response or debate from Ministers whether they will consider further schemes should be carefully considered. More benefit could also be delivered if the rules around spending Lane Rental income were relaxed a little. Authorities should also be able to challenge the duration of works at any time.

There is a need to ensure all key stakeholders engage with each other to improve works coordination. For example, boroughs, TfL, utilities and developers could work together more transparently to provide more effective information sharing to ensure roadworks cause as little impact as possible. As mentioned above, lane rental has been deemed a success and it would be interesting to learn whether an extension of this to borough roads would be welcomed by the boroughs themselves.

Q18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

While no data is available to assess the effect of recent cycling and pedestrian infrastructure improvements on congestion, TfL's most recent monitoring report on the effectiveness of the Congestion Charge (dated July 2008) states that some of the benefits realised from the Congestion Charge was offset by reduced road space following improvements to pedestrian and cycling infrastructure, such as the remodelling of Trafalgar Square[10]. Also anecdotally, there is general agreement that the increase in cycling infrastructure on the highway has had a negative impact on congestion as in many areas the existing limited space is shared. There is an expectation of this in the short term, but that in the medium to long term it will improve as hopefully more people move from private vehicles to cycling.

Q19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

There could be an opportunity to provide more detailed traffic alerts, and use of smart motorway technology – providing useful, up-to-date, information on traffic to drivers, enabling them to make better decisions. The technologies used on smart motorways are a mixture of message signs and signals, CCTV, vehicle detection and

[10] Transport for London, 2008, Congestion Charge impacts monitoring – sixth annual report, released July 2008

variable mandatory speed limit enforcement. Some of these could be used on London's major roads, where appropriate, to help provide up-to-date information to drivers, helping them make better decisions when planning, or during, a journey. We support the trialling of the use of technologies to improve journey experiences across London's roads. Open sourcing this information will enable the private sector to develop standalone solutions or integrate this information with their own transport planning activity.

Demand Management measures, such as integrated urban mobility (use of multi-modal, public and private transport solutions), will be an important component in reducing the number of non-essential car journeys made on London's roads in a way that is attractive to Londoners. Such measures should take into account public transport accessibility, urban landscapes and social exclusion to ensure they are as effective for as wide an audience as possible.

Boroughs and TfL need to understand how they can influence the Mobility as a Service (MaaS) solutions that are being developed.

Q20. How effective has the Road and Transport Enforcement team been in tackling congestion?

It is important to highlight the importance that traffic enforcement teams play in reducing congestion. Good compliance comes with effective enforcement**.** London boroughs also manage congestion by having effective parking and traffic enforcement regimes. Parking policies, provision and enforcement are largely designed to reduce congestion by ensuring that permitted parking bays are available in areas where parking demand is high, and reduce 'illegal' parking which has a negative effect on congestion and traffic flow. The majority of boroughs in London (27 out of 33) undertake bus lane enforcement which is critical in reducing congestion and ensuring that buses can run to schedule. This has added importance in encouraging the use of public transport (thus reducing car use) if people feel confident in the network. 28 out of the 33 boroughs also enforce moving traffic contraventions. As well as being safety critical, moving traffic contraventions on box junctions, for example, also ensure smooth traffic flow and reduced congestion.

It is also crucial that there is alignment and coordination between TfL and borough enforcement.

Although there is no data to show the effectiveness of the team, before TfL was created in 1999/2000 it is understood that management of the strategic roads across London was limited in number and scope. The immediate implementation of the Red Route Network with its greater controls on parking, loading and waiting had a sea change effect on the capacity management of these roads. It has been suggested that this indicates that it may be beneficial for boroughs to be given similar powers to improve their control over their Strategic Roads.

Additional Information

Alternative working models

Places of employment, private or public sector, should look into the possibility for alternative working models to be adopted at their organisations. Organisations that implement innovative alternative working policies should be supported by the Mayor. Encouraging flexi-working could also be a potential contributor to reducing congestion, allowing staff flexible working hours outside of the usual working weekday. Another example is the need for employers to have access to improved 'superfast' broadband connections and the associated infrastructure, so that workplaces can provide 'virtual meeting' technologies confidently. These types of facilities could encourage organisations to allow their staff to work from home more often, knowing they have the necessary ability to work with no reduced productivity.

INVESTIGATION INTO TRAFFIC CONGESTION IN LONDON

This response to the Assembly Transport Committee is by the London Forum of Amenity and Civic Societies, an umbrella group for over 100 societies in London.

1 - **Traffic congestion has increased** despite staggered hours of working and deliveries extending the duration of 'rush hours', due to many more white vans, mini-cabs, take-away food deliveries and, possibly, the number of Uber vehicles. The Assembly should seek statistics on those aspects.

2 – **Causes of changes in congestion** include:

- Cycle Superhighway lanes which restrict lanes for traffic and in some cases moving buses into the main traffic lanes. The latter also frustrates passengers due to extended journey times and is likely to encourage the use of cars on some routes instead of public transport.
- Increases in construction activity, replacement of infrastructure, such as gas, water, general road works, etc. This may mean that 'lane rental' is not working as it should.
- Many licences are being granted to Uber drivers and the increase in the number of their vehicles on London's roads needs consideration by the Transport Committee.
- In some high streets there are very many commercial waste collection firms serving businesses which increases the number of collection vehicles and their impact on traffic flows when collecting waste.
- Workplace parking in old office blocks is generous and there has not been a tax applied to spaces, as there should have been to discourage the use of company cars. New office blocks continue the problem.
- Many sets of lights are not as well phased in London as observed in other European cities which causes delay, congestion, pollution and increased delivery costs for goods. TfL should be asked to comment.
- Failure of the last Mayor actively to promote consolidation and break-bulk centres in Outer London – identifying potential locations in the London Plan (Table 2.1) is not enough – little progress has been made in the last 10 years. Similarly London Plan Policy 6.14

Freight does not appear to being implemented. Strategic action by the Mayor – how many London Boroughs have identified sites for consolidation centres and break-bulk facilities in the last 10 years. The Mayor need to be more interventionist in leading on this issue.

- Failure to promote car-free housing in Central/Inner London, in town centres and close to public transport interchanges – this would reduce house prices/increase housing choice for those not requiring a car and reduce car use.

3. **Impact of congestion on Londoners, the city's economy and its environment:** Congestion increases air pollution, business costs and bus journey times. Both congestion and the resulting state London's air quality have not been tackled robustly in the last two Mayoral terms.

4. Perhaps the way some have been more bold in pedestrianisation without increasing congestion needs to be examined.

5, 6, 8, 9 and 10. Whilst the existing **congestion charge** provides a disincentive for vehicles to commute into the zone, once inside, there is no further disincentive to driving around for the rest of the day. It thus entirely fails to address what is probably the larger problem of delivery vehicles and minicabs within the zone. Although more expensive to implement, it is only a usage-based charge which can effectively address this source of congestion, as well as commuting. It also has the advantage that it does not unfairly penalise those who need to make short journeys into (or within) the zone, can be readily adapted to incorporate different levels of charging according to type of vehicle (and level of polluting), time of day, and across several zones, and incorporate tolling of (e.g.) river crossings. Deterring people using a car when there are good public transport facilities would be very beneficial in tackling congestion.

The exemptions for types of vehicle in the congestion charge zone and its size should be considered for any beneficial changes.

If the Committee's view is that there is currently insufficient information to determine the most cost-effective technology for introducing user-based charging, then the most urgent need is for a study to resolve this issue and

estimate the costs. To gain experience of the system in practice, it might then be appropriate to introduce the system in stages, with the initial focus where it will have the largest impact, such as on delivery vehicles.

7. **ULEZ** would reduce congestion initially by driving some old cars out of the sensitive Inner and Central London area, but, unless roadspace for vehicles is progressively reduced, they would be replaced eventually with new vehicles. The advantage initially would also be in air pollution reduction, but to be secured long term this would need to achieve an overall reduction in the number of vehicles in these areas.

8. **Other Interventions:**
See above for **workplace parking** levy which should be introduced, particularly for offices in high PTAL locations.

Tolls could help to reduce traffic volumes. The Committee could explore the use of an exit toll **at Heathrow and other airports** for certain types of vehicles to discourage business people using cars to access flights and friends/neighbours/family driving people to the airports for flights or to collect those arriving. Concessions would be needed for elderly or disabled people.

People going to flights could be dropped at the most convenient station with step free access connected to the airport. Transport facilities are generally good and make road access not usually necessary. Public transport access from the south into Heathrow airport should be improved.

Dealing with congestion in west London caused by traffic related to Heathrow airport is a difficult problem and therefore this suggests that an extra runway there would severely exacerbate the situation.

It is not so much the devolution of VED to the Mayor which will help as how the Mayor would use such new powers, which should be made to target more polluting vehicles; the Mayor should consult on a strategy for how he would use the powers as soon as possible, as he has to date been silent on this.

9**. Freight delivery:** See above, especially 2 on consolidation and break-bulk centres, to reduce the size of vehicles plus better scheduling of deliveries.

10. **Minicabs:** See 2. above. The impact of the Night Tube causing lower demand for taxis and cabs should be considered and the implications of their drivers waiting in streets for bookings.

The market for taxi and cab services has not yet stabilised and adapted to current conditions and it may be that some drivers will find lack of business and give up such work.

11**. Car clubs** are an excellent way of persuading people to give up using their own car. The statistics for the beneficial effect are in the Mayor's Transport Strategy and London Plan policies apply. However, boroughs have been reluctant to allocate the required number of bays for car club cars and vans because they object to "private companies making profit out of borough roads" and because car-owning residents do not want to see the number of parking bays for themselves and their visitors reduced. More attention must be paid to these problems. Car club bays could be in car parks of businesses and supermarkets but not enough planning has been applied.

12. **Bus Services:** The introduction of one fare for several bus journeys over a two-hour period would increase bus usage. More bus routes in Outer London to and from places of leisure, shopping, sport, entertainment, etc. are required. TfL should be persuaded **not** to move bus stops away from transport interchange points, as they have done.

13. **Modal Shift** TfL should encourage **car clubs** and reduce overcrowding on the Underground by increased service frequency. They should advertise both alternative routes and the beneficial impact of the introduction of Crossrail on services which people find uncomfortable now. More details on walking routes and times from stations should be publicised so that people leave their journey one stop early or do not change lines for one stop. The introduction of air-conditioned trains should be accelerated.

14 to 16: **Road Infrastructure:** Additional road capacity generates traffic –

this was discovered in the 1920s following the construction of the Great West Road which not only showed huge amounts of traffic handled but also a more than doubling on Brentford High Street within 10 years (Source: Ministry of Transport, Highway Development Survey 1937 (aka Bressey-Lutyens Report, HMSO 1938 paragraph 39) which was quoted in the SACTRA Report.

The approach in the former Mayor's Transport Strategy 2025 recognised that demand management rather than increased capacity was essential.

17, 19 and 20. We have no comment on these questions.

18. See comments in 2. above.

Response submitted by Peter Eversden [redacted]

Investigation into traffic congestion in London

London Assembly Transport Committee

30 August 2016

Living Streets

We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illness and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone.

For more than 85 years we've been a beacon for walking. In our early days our campaigning led to the UK's first zebra crossings and speed limits. Now our campaigns change minds and ensure that every one of us is able to exercise our right to walk and the freedoms and possibilities it brings.

Our local projects deliver real change to overcome barriers to walking and our ground breaking initiatives such as the world's biggest Walk to School campaign encourage millions of people to walk.

This is a joint submission on behalf of national charity Living Streets and the London Living Streets Group. We welcome the London Assembly Transport Committee's investigation into traffic congestion and would be happy to give evidence in front of the committee.

Introduction

London's ambitions for creating a world class city for living, a healthier population and a more prosperous economy will only be fully realised if the mayor and TfL take bold action to encourage Londoners out of their cars and onto their feet, bicycles and public transport.

When the Congestion Charge was first introduced it made significant changes to the way people travelled around central London. The decrease in traffic gave space for more sustainable travel: walking, cycling and public transport. It brought revenue into London's transport system to pay for public realm and public transport improvements that have made London a better city to live, visit and work.

That was 13 years ago. It is time to look again at how we pay to use the roads in London.

We want the new mayor of London to act now, by committing Transport for London to complete a feasibility study on the options of an extended road-pricing scheme, bringing together the current congestion charging and ultra-low-emissions zones.

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This should be combined with wider infrastructure and public realm improvements to encourage more people to walk and cycle their everyday journeys.

Key questions

1. ***How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?***
2. ***What are the key causes of these changes in congestion?***

Over the last 15 years London has experienced strong growth in public transport, walking and cycling, with a trend of falling car use despite an increasing population[1].

This fall in road traffic has been attributed to a much-improved public transport offering, societal changes affecting car ownership and use, and reductions to available road network capacity. Increasing densification in London has also contributed. These trends are consistent with the 'peak car' theory that proposes that per capita car travel has begun a decline from a peak in major Western cities[2].

Over this period, average journey times, congestion and journey time reliability on London's roads have been maintained at relatively consistent levels.

The causes of the recent increases in congestion are complex. Part of the problem has been increases in certain types of vehicle, such as delivery vans and minicabs.

Pedestrian traffic has also increased, but is rarely given the attention it deserves. That's despite some 6.4 million walk-all-the-way trips being made on an average day in London in 2014. This is an increase of 9.3 per cent since 2008, reflecting population growth over the period. This gives a walking mode share of 24 per cent [3].

Walking plays an essential role in many more door-to-door journeys and increased public transport use has also increased the number of walk journey stages undertaken by Londoners. This brings health benefits, but is putting additional pressure on available pedestrian space on London's streets.

3. ***What impact does congestion have on Londoners, the city's economy and its environment?***

Over the next 15 years an extra 1.5 million people will move to London, bringing the population to over 10 million. This will increase demand for transport and other resources, with significant consequences for the economy, public health, and Londoners quality of life.

Lots of cars and traffic results in a lower quality of life for people living in cities. Time spent in traffic jams is unpleasant for drivers, but the knock on effects can be deadly for everyone else, with at least 9,000 people dying prematurely a year in London because of air pollution.

[1] Since 2000, London has achieved a net shift in mode share (at the journey stage level) of 11.0 per cent away from private transport, principally the car, towards public transport, walking and cycling – a feat unprecedented in any major city.
[2] Transport for London (2015) Travel in London Report 8
[3] Transport for London (2015) Travel in London Report 8

Assuming no policies are put in place to manage increased demand, it is estimated that every five years the transport system will need to cater for more than a million extra trips per day[4]. Only by encouraging people out of their cars towards other more sustainable modes of transport, will the mayor reduce inequalities, tackle pollution and make London a more attractive place to live and do business.

- Air pollution

Air pollution from vehicular traffic has a detrimental impact on Londoners' health and quality of life. The most significant cause of London's air pollution is its road traffic. NO2 concentrations throughout central London remain above the legal limit of 40 µg/m3.

The average NO2 concentration at Oxford Street in the 12 months to August 2015 was more than four times the legal limit. London is not expected to comply with NO2 standards until after 2030 [5].

The mayor has a number of policies in place to combat air pollution. Of these, the London Assembly's environment committee has concluded that the 'major mayoral success has been in traffic reduction' [6].

A holistic approach to London's road traffic pressures should seek to reduce the volume of vehicles on the network in order to tackle the major source of air pollution, whilst promoting alternative ways for Londoners to get around.

- Health

TfL's Health Action Plan, published in 2014, committed to improving public health through transport. The report highlights the importance of physical inactivity as one of the biggest threats to the health of Londoners which the transport system has a central role in tackling. Currently it is estimated that only 57.8 per cent of adults in London are meeting the minimum recommended physical activity levels while 27 per cent do not manage even 30 minutes of activity per week[7].

The mayor must seek to tackle congestion in a way that both reduces motor traffic and improves the health of Londoners by enabling more people to travel actively by foot or by bicycle.

- Economic

In recent times there has been a decrease in average road speeds as a result of an increase in vehicular traffic. However, the main perceived business problem arising from congestion is unreliability, rather than increased time taken. In that respect, the TfL road network has largely retained its historic stability in the most recent year.

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[4] Transport for London (2014) London's Road Modernisation Plan. https://t.gov.uk/travel-information/improvements-and-projects/whats-the-plan

[5] Institute for Public Policy Research (2016) London: Global Green City http://www.ippr.org/files/publications/pdf/london-global-green-city_Apr2016.pdf?noredirect=1

[6] London Assembly Environment Committee (2015) Driving away from diesel: Reducing air pollution from diesel vehicles, Greater London Authority. https://www.london.gov.uk/sites/default/les/Driving%20Away%20from%20Diesel%20nal%20report.pdf

[7] Public Health England (2014) Active People Survey

There are a number of solutions the mayor might consider in order to tackle unreliable journey times. For example providing road users with good predictive travel time information before they set out, so reducing uncertainty in arrival time. This is becoming increasingly possible through digital technologies, which are far more cost effective than traditional civil engineering technologies in meeting the needs of road users [8].

Increasingly a 'new economy' which encompasses sectors like tech, legal and finance and creative are choosing to locate in urban centres and have transport priorities focused on urban realm and active travel. Attracting this new economy will necessitate a reallocation of London's road space requiring a reduction in vehicular traffic.

4. What can London learn from other cities in its effort to reduce congestion?

"In successful cities, there is a clear trend towards reducing the impact of motor traffic to improve the quality of life and make them more attractive to live in and to do business. Exciting new spaces for city life have been created, and they have delivered high-quality cycling networks and made cities great for walking." (Roads Task Force, 2012[9])

For the majority of the twentieth century, city planning in London and elsewhere, focused on designing around the car, effectively engineering walking out of our everyday lives. Now, an increasing number of city leaders are beginning to understand the benefits of getting more people onto their feet and reducing the number of cars, in order to improve the health and happiness of their citizens and create more vibrant, thriving economies[10].

This is resulting in the rise of new policies centred on encouraging walking and putting people back in at the heart of decisions about the built environment. Several cities have already started to take action. Oslo for example is planning to go car free in its central district by 2019[11]. Hamburg, Helsinki, and Madrid are also contemplating going car free and in Paris there are ambitious plans to semi-pedestrianise seven of its most famous squares by 2020. Madrid's car free initiative has led to cars being banned from the city's four central districts whilst in Buenos Aires, they are pedestrianising 100 city blocks.

Stockholm's system charges each time a 'gate' is passed. The user then pays each time they cross into the city – this acts as a deterrent to through-traffic and encourages users to complete their business in one visit. The London zone, in contrast, can be entered and left any number of times throughout the day. In addition, Stockholm's charge varies between the peaks, inter-peak and night time[12].

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[8] David Metz (2015) Can we build our way out of congestion? http://peakcar.org/can-we-build-our-way-out-of-congestion/

[9] TfL (2012) Roads Task Force Report http://content.tfl.gov.uk/rtf-report-chapter-1.pdf

[10] Arup (2016) Cities Alive : Towards a Walking World http://publications.arup.com/publications/c/cities_alive_towards_a_walking_world

[11] http://www.citylab.com/cityfixer/2015/10/6-european-cities-with-plans-to-go-car-free/411439/

[12] Eliasson, J. (2014) The Stockholm Congestion charges: an overview, Centre for Transport Studies, Stockholm

The Italian city of Florence operates an “access control” area based scheme. If you live in one area you can drive in that area, but you have to pay to cross boundaries. This serves to reduce traffic in residential streets, making them more pedestrian and cycle friendly[13].

These cities, and many others across the world, are realising that you can’t simply build your way out of congestion and that by reducing vehicles you can create better places to live and do business.

The Mayor of London must now engage with TfL and the London boroughs to deliver a larger, coordinated programme of place improvements, complemented by well-designed strategic measures to reduce motor vehicles and make London a great city to walk and live in.

5. How effective is the Congestion Charge? How should this scheme be modified?

6. To what extent would a usage-based road pricing regime help reduce congestion?

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

When the Congestion Charge was first introduced it made significant changes to the way people travelled around central London. The decrease in traffic gave space for more sustainable modes of travel: walking, cycling and public transport. It brought revenue into London’s transport system to pay for these improvements. It made London a better city to live, visit and work. That was 13 years ago. It is time to look again at how we pay to use the roads in London.

We want the new Mayor of London to act now, by committing Transport for London to complete a feasibility study on the options of an extended road-pricing scheme, bringing together the current congestion charging and ultra-low-emissions zones.

While it is clear that an expanded road pricing scheme would result in significant benefits, many complex factors would have to be considered in the development of a successful scheme.

Providing a definitive set of recommendations based on a comprehensive analysis of the many factors involved can only be properly undertaken by TfL. For this reason, we recommend that the mayor should mandate TfL to assess the feasibility of an expanded road-pricing scheme that considers:

1. Integrating the CCZ, LEZ and ULEZ to create a single road-pricing zone.
2. Expanding this zone across the existing London-wide low emission zone in order to maximise its impact.
3. Implementing the zone by 2019, with all taxis and buses to be fully compliant by this date also.

Such a scheme more effectively charge road users for their contribution to air pollution and congestion and could raise revenue to reinvest in public transport,

[13] http://www.visitflorence.com/moving-around-florence/by-car.html

cycling and walking. Future revenues could also be used to compensate for the loss of TfL's general grant from central government.

There is a good precedent here: the greatest cost incurred in establishing the CCZ lay in upgrading the public transport network, but since then around 80 per cent of the resultant revenues have been invested in the bus network alone.[14]

8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure

We consider that new road infrastructure would have a detrimental impact on London by increasing traffic volumes as a result of induced or generated traffic. Even with tolls on new capacity, we would expect a certain level of induced traffic. We are therefore opposed to new road capacity even when tolled.

We would like instead for the mayor to invest in new infrastructure that improves walking and cycling connections, necessary to create a modal shift towards active travel. For example we support the proposal by Sustrans for a new walking and cycling bridge over the river Thames between Rotherhithe and Canary Wharf. Walking and cycling infrastructure like this can have major health benefits, and should play a central role in keeping London moving actively and connecting our growing capital.

It may be that existing road infrastructure is suitable for tolling as part of a package of smart road pricing measures. Tolling of this type should be considered in a wider feasibility study of road pricing to be undertaken by the mayor and TfL.

- Workplace Parking Levy

We believe a Workplace Levy (with an associated package of support measures e.g. personal travel planning and season ticket loans) has significant potential and should be seriously considered as part of a wider feasibility study we are calling on the mayor to undertake.

- Devolving Vehicle Excise Duty to London

The UK Government recently took the decision to reform the banding structure of Vehicle Excise Duty (VED). However, the new VED model will continue to be levied on the basis of carbon dioxide emissions. Indeed, even after the changes to banding are implemented, VED remains a tax on pollution.

The UK Government's plan to dedicate all VED revenue to a new Roads Fund therefore contradicts the very purpose of the tax. Additional strategic road capacity will tend to lead to increased demand and, inevitably, more pollution.

In London we would like to see the mayor working with the Chancellor to explore a different approach. Instead of using VED to increase road capacity and pollution, we believe revenue raised from the tax should be allocated to infrastructure to increase walking and cycling and integrate sustainable transport modes to enable people to

[14] Institute for Public Policy Research (2016) London: Global Green City http://www.ippr.org/files/publications/pdf/london-global-green-city_Apr2016.pdf?noredirect=1

choose healthier, cleaner and cheaper journeys, while reducing pressure on existing roads by cutting congestion.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

The mayor and TfL should work with industry to reduce inefficient van traffic. The mayor should establish a working group with Transport for London, the logistics sector and online businesses tasked with maximising the efficiency of van use for deliveries in London. The success of TfL's CLOCs programme to improve road safety in the construction sector shows what the private sector can achieve with leadership from the public sector.

There is scope for delivery vehicles and those linked to employment to be more efficient and reduce their mileage. A paper for the Roads Task Force suggested that there was significant scope to reduce van traffic in London, because:

- The average load factor for vans was 38 per cent, and
- On average, 39 per cent of vans are less than ¼ full.[15]

Consolidation centres provide the opportunity to maximise the efficiency of deliveries into central London, by consolidating materials at another location and ensuring a full load at least one way if not both. For example, by collecting waste for the return trip.

Through supportive planning policies and incentives, the mayor could further increase the uptake of freight consolidation to reduce traffic from delivery vehicles.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

In recent years, van traffic in London has been growing strongly. In 2014 van traffic was 10.1 per cent higher than in 2011.

In addition, recent technology change has meant the number of licensed private hire vehicles has also increased at a rapid rate – up by a net 27.2 per cent between 2008 and 2014, and up by 18.8 per cent over the latest year alone.[16]

As part of the proposed road pricing feasibility study we would like to see the mayor consider targeting heavy road users – like commercial delivery vehicles, minicabs or private cars – with specific measures to reduce congestion and air pollution.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

A shift to greater use of various forms of car-sharing can reduce congestion and emissions[17]. There are opportunities in shared ownership, taking advantage of the fact that most private cars are parked for more than 95% of the time. Car clubs also

[15] Transport for London (2013) Roads Task Force – Technical Note 5: What are the main trends and developments affecting van traffic in London?
[16] Transport for London (2015) Travel in London Report 8
[17] Car Club Coalition (2015) A Car Club Strategy for London: Growing car clubs to support London's transport future, London. http://content.t.gov.uk/t-car-club-strategy.pdf

allow people to avoid owning their own car when their need to drive is limited, freeing up parking space for other uses.

It has been demonstrated that people who don't own a car are more likely to walk and cycle. However, it is not clear what impact increased car sharing would have on overall traffic.

For example, car ownership would be reduced but car use would be more intensive, which might make little difference to overall traffic. Roadside parking could be reduced if personal ownership declines. But this would be in the neighbourhoods where on-street parking is permitted, so the impact on urban traffic congestion would not be great. Ride sharing could reduce car use, or it might take people away from public transport.[18]

It may be that shared use vehicles could be promoted through road pricing or similar demand management measures.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Buses play a hugely important role in moving Londoners across the capital. TfL's bus network also has significant health benefits, encouraging Londoners to be more active. We would like the significant level of forward investment in the network to continue.

However the bus network could also be made more efficient, maximising its quality of service whilst minimising its impact on London's congestion and air pollution. We are calling on the mayor to undertake a comprehensive review of the bus network in inner London that will allow space to be reallocated to improving London's public spaces, including a vehicle free Oxford Street. The new 'hopper' ticket should allow a bus gate type model to be introduced aiding this reconfiguration in inner London.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Between 1994 and 2014 there has been a net shift in mode share, at the trip level, of 13 percentage points away from the private car towards public transport, walking and cycling. There has been a particularly strong and sustained decline in private transport mode share among inner London residents, from 27 per cent in 2005/06 to 20 per cent in 2014/15.[19]

Among inner Londoners, the modal shift away from private transport in the last 10 years has been towards cycling, with a 2 percentage point increase in mode share, and walking, which has seen a 3 percentage point increase.

Recent cycling investment has provided clear gains, with the number of cyclists having tripled since 2000[20]. This investment should continue. Walking has also increased in popularity, and investments in walking infrastructure should continue as

[18] David Metz (2015) Car Sharing: how disruptive? http://peakcar.org/car-sharing-how-disruptive/
[19] Transport for London (2015) Travel in London Report 8
[20] Transport for London (2015) Travel in London Report 8

part of a broader process of urban development that encourages walking through the improvement of public spaces.

Making London a world class city for walking will require a series of complimentary measures, including:

- **Ambition and strong leadership** to ensure walking is at the heart of policy and practice and that the quality of the pedestrian environment is prioritised.

- **Streets and public spaces designed around the needs of people walking**, and in consultation with the local community, so that people choose to walk and spend time there. Flagship initiatives to re-allocate space to pedestrians should become principles firmly embedded in both TfL and Borough maintenance and improvement schedules. This should include a focus on London's high streets and town centres along the lines of the Healthy Streets agenda to encourage more to walk and cycle to their local town centres.

- **A high quality network** of well connected, direct and easy to follow routes encouraging people to walk, supporting local services and reducing road traffic congestion.

- **Supportive land use and planning** will help create walkable neighbourhoods and improve access to local centres that will allow communities to walk to everyday services and facilities and reduce the need for short journeys by car, avoiding auto-centric development which facilitates car-based journeys and disenfranchises those with out access to motor vehicles[21]. Part of what makes London so car dependent are the relatively low population densities of the outer boroughs. Encouraging sustainable growth in the outer boroughs will increase their economic mass and make the opening of adjacent businesses to support these denser populations more attractive.

- **Promotion of sustainable transport choices** and behaviour change campaigns to encourage more people to walk their everyday journeys to school, work and the shops.

- **Tackling road danger** at source by managing traffic (for example, by slower speeds and reducing the numbers of HGVs on London streets), rather than restricting pedestrian movements. TfL deserves praise for its planned introduction of mandatory Intelligent Speed Adaptation (ISA) on its buses and this approach should be rolled out to all the fleets that it has a duty of care/management of such as Cabs and Private Hire Vehicles and Goods Vehicles. As new vehicles are purchased, Local Authorities should be incentivised to ensure their vehicles are fitted with ISA as are those of their contractors.

[21] An interesting example of emerging good practice comes from the Old Kent Road Opportunity Area where consideration is being given to coupling public transport improvements (with the Bakerloo Line extension and improvements to walking and cycling facilities) with a removal of the auto-centric developments of the 1980s as out-of-town style retail would be replaced with far denser people centric development.

- **Designing the urban environment so that people feel safe**. In general, life and people themselves make streets feel safer.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Travel behaviour patterns, tracked over the past 40 years by the National Travel Survey show average travel times staying steady at about 370 hours a year, or an hour a day. What has changed over the period is the average distance travelled, which increased from 4500 miles a year in the early 1970s to 7000 miles in the mid 1990s, since when this has ceased to grow.[22]

In other words, people have taken the benefit of investment by travelling further to more distant destinations, not by saving time in reaching unchanged destinations. This is contrary to what transport economists suppose when they estimate the main benefit of investment as time savings, valued for the extra work or leisure supposedly made possible.

This extra traffic is what is known as 'induced traffic' - extra traffic that arises because people take the benefit of road improvements that allow faster travel as more opportunities and choices at greater distances.

We consider that new road infrastructure would have a detrimental impact on London by increasing traffic volumes as a result of induced or generated traffic. We are therefore opposed to new road capacity even when tolled.

16. How should new road infrastructure be funded?

We are calling on the mayor to extend the current road-pricing scheme. This would raise revenue to reinvest in public transport, cycling and walking.

There is a good precedent here: the greatest cost incurred in establishing the CCZ lay in upgrading the public transport network, but since then around 80 per cent of the resultant revenues have been invested in the bus network alone.[23]

Future revenues could also be used to compensate for the loss of TfL's general grant from central government.

We would also like to see the mayor working with the Chancellor to explore a different approach to using Vehicle Exercise Duty (VED). Instead of using it to increase road capacity and pollution, we believe revenue raised from the tax should be allocated to infrastructure to increase walking and cycling and integrate sustainable transport modes to enable people to choose healthier, cleaner and cheaper journeys, while reducing pressure on existing roads by cutting congestion.

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[22] David Metz (2015) Can we build our way out of congestion? http://peakcar.org/can-we-build-our-way-out-of-congestion/

[23] Transport for London (2015) Ultra Low Emission Zone (ULEZ) Portfolio http://content.t.gov.uk/board-20151217-pt1-item12-ulez.pdf

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

People travelling on foot, bicycle or public transport is a far more efficient use of road space than people travelling by car. Reallocation to walking and cycling infrastructure has facilitated a significant 'modal shift' in the type of transport people are using: between 2001 and 2011 the number of cycling trips increased by 66.6 per cent, bus by 59.7 per cent and overground rail by 41.9 per cent[24]. Wider benefits include reductions in cycling and pedestrian deaths, and decreases in air pollution.

Walking is an important and often under-estimated transport mode for Londoners. Some 6.4 million walk-all-the-way trips were made on an average day in London in 2014. This is an increase of 9.3 per cent since 2008, reflecting population growth over the period. This gives a walking mode share (for all travel) of 24 per cent. In addition, increased public transport use has also increased the number of walk journey stages undertaken by Londoners. This brings health benefits, but is putting additional pressure on available pedestrian space on London's roads.

Walking has increased in popularity, and investments in better walking infrastructure should continue as part of a broader process of urban development that encourages walking through the improvement of public spaces.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

20. How effective has the Road and Transport Enforcement team been in tackling congestion

N/A

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Head of Policy and Communications
Living Streets
[redacted]

Jeremy Leach
Chair of the London Living Streets Group
[redacted]

[24] Transport for London (2012) Travel in London: Report 5. https://t .gov.uk/corporate/publications-and-reports/travel-in-london-reports

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The London Assembly Transport Committee
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4 August 2016

Dear Georgina

London's congested roads

London TravelWatch is the statutory body that represents London's transport users. Thank you for consulting with us and inviting our views on this important issue for Londoners. This is a very pertinent investigation and responds well to our call in the run up to the Mayoral elections, 2016 for:

> A planned and co-ordinated approach to reducing road traffic demand, which considers all measures including road pricing[1].

Introduction

We agree with the premise of this investigation, that London's roads have become busier and more congested over the last few years and that without intervention the problem will get worse in the future. The mayor's Roads Taskforce report suggested that congestion would increase by 15, 25 and 60% in outer, inner and central London respectively by 2031 even with all of the proposals of the extant mayor's Transport Strategy implemented.

More congested streets mean longer and less reliable journeys whatever mode one uses. More congested and busy roads mean that vulnerable road users will be involved in more frequent collisions, air quality will be poorer and public health outcomes negatively affected due to diseases of inactivity.

London is growing. This will mean a million more homes, one and a half million more people and millions more road based trips a day. London has to grow, but must grow in a smarter way: Our streets and public spaces should be more pleasant so that residents want to spend more time using their streets and public spaces. More journeys should be made by public transport, cycle and walking. There should be fewer private cars and a greater proportion of car-club cars. Goods and services should be delivered by fewer vehicles and on time.

[1] Transport users' priorities for the 2016-20 mayoral term. London TravelWatch, February 2016

Over a number of years we have considered these issues and conclude that a strategy of improving public transport, cycling, walking and public spaces is vital. We think that it is important to prioritise the most space efficient modes on London's streets. But we also think part of the solution is a wider more sophisticated strategy to manage demand for road space. This should include the management of parking by price, reductions in parking availability in areas well served by non-private car modes and a more sophisticated system of pricing road use.

We have met with business groups, professional transport planners, London borough transport officers, academics and many other stakeholders. All share our concern regarding rising levels of congestion. Most think roads pricing should be considered as part of a solution.

I hope the Commission find this submission useful. We have additionally appended a series of recommendations that describe what actions need to be undertaken to address congestion in London. If we can assist the commission further please contact me at [redacted]

Regards

Vincent Stops
Policy Officer

The Assembly's questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

We are aware from TfL's monitoring of traffic volume, speeds, Journey Time Reliability (JTR) and bus speeds that traffic congestion started to rise in London in about 2011. First in outer London, but latterly in inner and central London. More recently and associated with the Mayor's major highways schemes, there has been a rise in congestion in central London that has meant bus service performance has significantly declined. Some bus services have had to be curtailed before their planned destination.

Bus route numbers curtailed as of March 2016: 3, 8, 15, 53, 115, 148, 254 (though the 254 has also been affected by the closure of Aldgate bus garage). The 25 was diverted over the Bow Flyover and so stopped serving passengers at stops at ground level. The 53 recently reverted to Its route.

2. What are the key causes of these changes in congestion?

The link between traffic volume, traffic capacity and congestion is complicated but generally traffic volumes have risen because of:

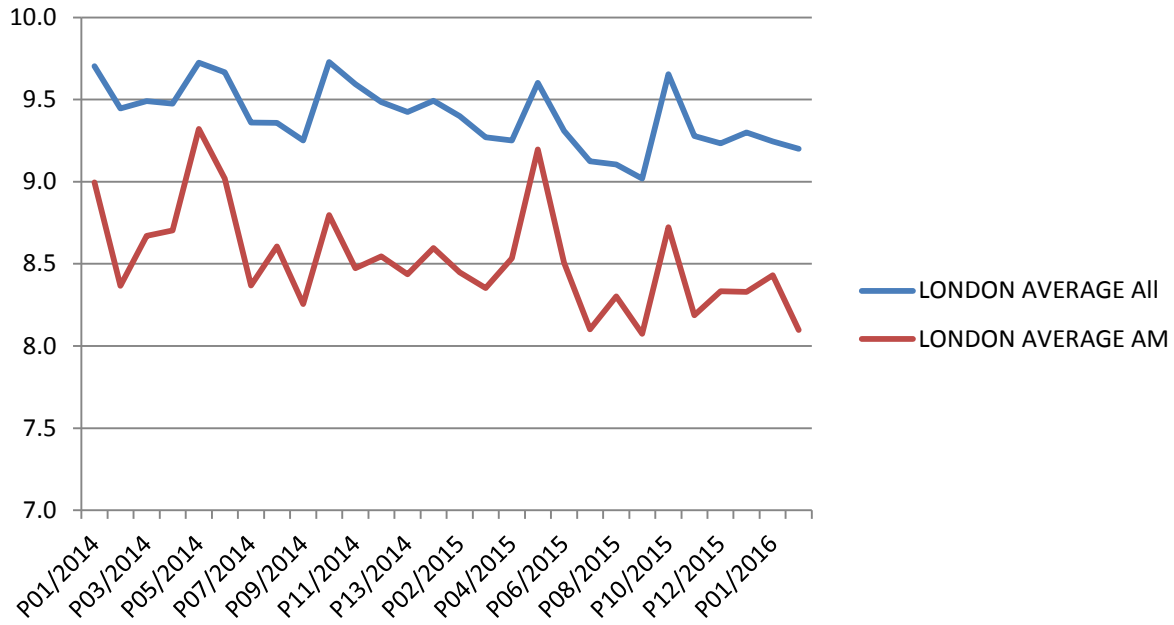
- a growing population;
- a recovering economy;
- a drop in fuel price;
- a rise in the number of private hire vehicles and white vans;
- the withdrawal of the Western Extension Zone of the congestion charge zone;
- as an unintended consequence of a policy of 'smoothing the traffic'.

Traffic capacity has been reduced generally because of:

- town centre and other amenity schemes, road safety and cycling schemes;;
- the introduction of a grace period for parking violations;
- disallowing the use of cameras for the enforcement of parking violations;
- many major third party building projects taking highway space.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Many bus journeys are taking longer and are less reliable. The graph below shows the trend over time in bus speed. Over the past couple of years, bus reliability has also deteriorated



Average bus speeds across all of London at all times and in the am peak. Speeds are in mph and include dwell times[2]

Recently some bus services have been curtailed on a temporary basis due to the TfL's major works programme. Routinely there will be additional ad-hoc curtailments of bus services in poor traffic conditions. Curtailments are very frustrating for passengers.

Many millions of bus passengers have abandoned bus services, particularly associated with TfL's long-term road works[3].

TfL tell us that there has been a reduction of £71 million in fares income compared to budget over financial period 2015/16 and possibly £200 million over the business plan.

As well as lost fares revenue there has been additional cost to TfL because it has had to pay for additional buses to try to maintain performance as best as it can. Greater priority for bus services would mitigate and could deliver significant cost savings as well as improve services across the network.

[2] TfL measure and publish bus speeds for all bus routes in London at: https://tfl.gov.uk/corporate/publications-and-reports/buses-performance-data

[3] http://content.tfl.gov.uk/stp-20160225-part-1-item05-managing-directors-report.pdf

Of course, delays are also experienced by general traffic. Extended journey times and poorer journey time reliability for general traffic will mean inconvenience for all users of London's road network. There will be a substantial cost to the economy.

Higher levels of pollution are associated with congested traffic flow conditions compared to freely flowing traffic.

Cycling along and walking across the road becomes more problematic and less pleasant in heavily congested conditions.

More collisions would be expected where there is more vehicular traffic.

4. What can London learn from other cities in its effort to reduce congestion?

We have no data on other cities congestion, but would direct you to the INRIX company scorecard. INRIX attempts to compare congestion in different cities. There are some surprises in the list.

	Average Hours Wasted in Traffic in 2015[4]	
1.	London Commute Zone, UK	101
2.	Stuttgart, Germany	73
3.	Antwerp, Belgium	71
4.	Cologne, Germany	71
5.	Brussels, Belgium	70
6.	Moscow, Russia	57
7.	Karlsruhe, Germany	54
8.	Munich, Germany	53
9.	Utrecht, Netherlands	53
10.	Milan, Italy	52

Copenhagen is an exemplar. It recognises the need for trip end restraint (reduced car parking availability). Over a number of years, the Copenhagen authorities systematically reduced the amount of parking in the central area. This has the affect of reducing motor vehicle trips and more use of alternatives. This would be an appropriate intervention for central London and some other congested, accessible centres.

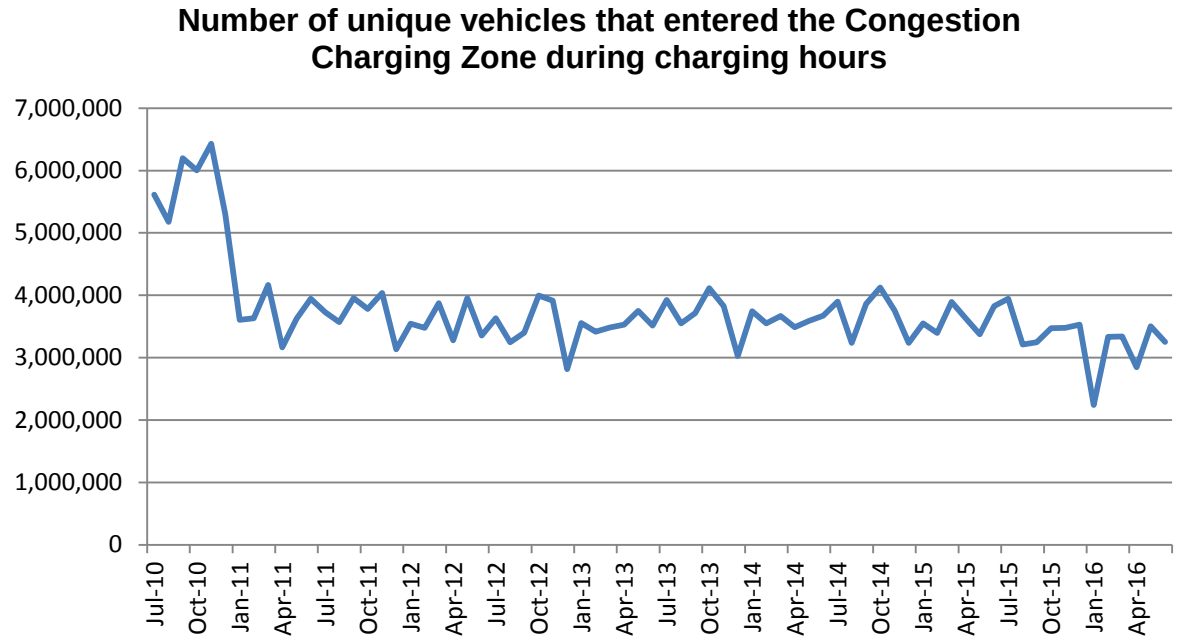
Delft is the classic example of a city that has restrained through movement for vehicles into the centre of town. Again, this discourages motor vehicle trips and encourages the alternatives. To a degree, this is achieved in central London using the congestion charge.

[4] INRIX Scorecard 2015: http://inrix.com/scorecard/

There are a number of successful cities, such as Amsterdam, that have increased cycling levels, but it should be noted they have lower walking mode share than London, are much smaller and less reliant on bus services.

London has been the most successful very large city in terms of shifting journeys from private car to public transport and so it would be remiss not to learn from London's success. It is also important to recognise the differences in the scale, intensity and transport histories of different cities.

5. How effective is the Congestion Charge? How should this scheme be modified.



Taken from the London data Store: http://data.london.gov.uk/dataset/vehicles-entering-c-charge-zone-month The dip occurs at the time that the Western Extension was deleted.

The central area congestion charging zone, introduced in 2003, was the most ambitious traffic management scheme of its kind in the world. It successfully reduced the number of vehicles entering the central area by between 15 to 20% and reduced congestion by 30%. This was at the top end of expectation at the time.

There have been changes to the operation of the scheme. The Western Zone was added and then deleted. There have been numerous changes that have reduced the road capacity to improve local amenity, prioritise the bus, cycling and walking. Early on, the Shoreditch Triangle was reverted to two way operation, more recently road capacity has been significantly reduced for motor vehicles with the works of the Roads Modernisation Programme[5]. TfL told us in May 2015 that this amounted to some 25% (time and space) within the inner ring road, though they have subsequently said they have not continued the analysis that generated this figure. We also know that following consultation there were changes to the east west cycle scheme that would have reduced this figure. The Roads Modernisation Programme

[5] http://www.londontravelwatch.org.uk/documents/get_lob?id=4026&age=&field=file

works have resulted in increased congestion within the central area as evidenced by TfL's Journey Time Reliability Statistics and bus speeds / reliability measures. The graph above indicates that there may also be fewer vehicles entering the central area.

The central area congestion scheme does need further modification to take account of reduced motor vehicle traffic capacity. London TravelWatch thinks it should become more a more sophisticated system, cover a wider area and prioritise the most space efficient mode, the bus.

Modifications could include:

- charging according to location, time and distance travelled
- removal of exemptions for private hire vehicles and taxis
- a reduction in the discount for residents.

A trial of such a more sophisticated system could perhaps be carried out on a small scale if the suggestion of the previous mayor, to introduce congestion charge to private hire vehicles, were implemented.

6. To what extent would a usage-based road pricing regime help reduce congestion?

A usage-based road pricing scheme would mean that the strategic transport authority would be able to manage demand at a level that was felt appropriate, as opposed to the present situation where traffic levels are being restrained by congestion.

There would, of course, be income from such a scheme. The existing scheme led to the introduction of 10,000 extra spaces on buses entering central London in the busiest hour. An even greater level of investment into public transport and other modes would be possible with a wider, more sophisticated scheme. This would, in turn make the space efficient modes more attractive.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

This would, in the short term add to the cost of driving in and around London and therefore reduce congestion levels. However, in time it would have only a small impact because it is likely that its implementation and other regulations for cleaning up vehicle emissions would lead to a substantially compliant fleet.

8. What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London

Short of a wider, more sophisticated charging scheme, London TravelWatch supports the tolling of river crossings because this would manage the demand for the crossings. This is particularly important with any new road capacity, as the potential benefits would be undermined by the increase in motor vehicle traffic that would occur.

There would be an issue if only the new crossing were to be tolled. There would be some displacement to other crossings that would have implications for the local road network there. We have supported TfL with respect to tolling the Silvertown Crossing, where they would also toll the Blackwall Tunnel. However, we have suggested their may also be an impact at the Rotherhithe crossing.

The leader with respect to workplace parking levy is Nottingham City council. The levy has funded a new tram system. Nottingham has a particularly high number of workplace parking spaces and so a levy was thought to be particularly appropriate. We don't have any sense as to its appropriateness or otherwise in London, though it would certainly reduce congestion if applied.

The retention of VED would allow TfL to be more innovative in developing a pricing system for London. It would make a pricing system more acceptable because there could be a lower charge for Londoners using the roads than otherwise would be the case.

Trip end restraint (parking control) is also particularly effective. Indeed, it is claimed that it was the key to transforming Copenhagen. Adopting a programme to reduce the amount of on-street parking in central London and other centres would allow improvements to be made for all the space efficient modes. It would be particularly useful to initiate such a programme in central London and is relevant to the Oxford Street debate.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

A wider, more sophisticated road user charge would mean that all the chargeable users of London's roads would use them more efficiently. The delivery industry would become more efficient, consolidate deliveries and change the times at which they deliver to the less congested times.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

The rise in PHV registrations has been remarkable. However, we have no sense of the scale of the impact of this rise in registration.

A wider, more sophisticated charge would mean that all chargeable users of London's roads would use them more efficiently. The private hire vehicle industry would charge a little more for using London's busiest streets at busy times. This would lead to a reduction in private hire vehicles using London's busiest streets at the busiest times.

Charging PHVs the true costs of the congestion they cause is a far more proportionate and effective method of reducing their impact than some of the other operating restrictions that have been proposed, all of which would have the effect of reducing consumer access.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

The best assessment of car clubs we know of can be found at:

http://content.tfl.gov.uk/tfl-car-club-strategy.pdf

In summary car clubs can bring wider benefits such as:

Freeing up parking spaces through members selling a car or deferring a planned purchase of a car;

improved air quality, reduced CO2 emissions through use of cleaner vehicles (particularly if electric vehicles are used in the fleet) and greater use of sustainable transport ;

Increased familiarity with electric vehicles;

making them more visible, desirable and accessible to a wider audience;

the true costs of owning a car (including upkeep, maintenance and depreciation) are often underestimated by owners;

car club users can make significant savings when switching from private ownership;

car clubs can have financial benefits for businesses through rationalised business travel and reduced commuting by car.

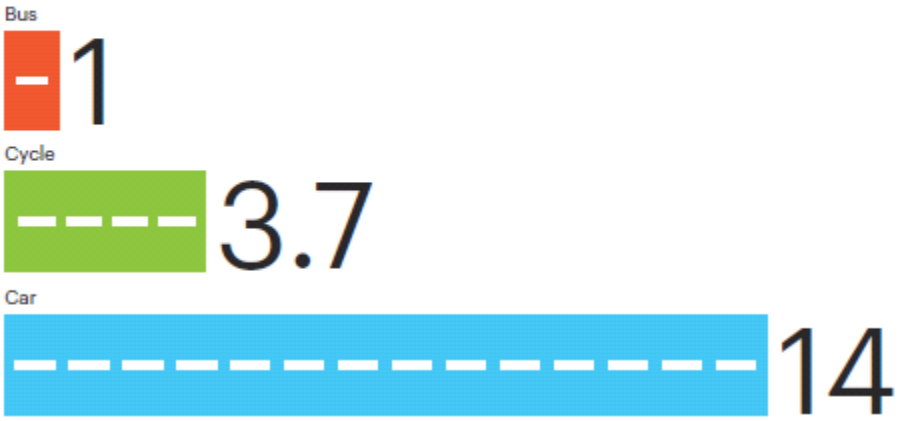
12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

There are 7000 buses in London and 2.6 million private vehicles.[6] In London, it makes sense to prioritise the most space efficient users of road capacity. The previous mayor's Roads Taskforce report[7] published the figure below that illustrates the relative space efficiency of bus, cycle and car.

[6] Census 2011

[7] The Roads Task Force (RTF) was set up by the then-Mayor of London in 2012 to tackle the challenges facing London's streets and roads.

Figure 4: Indicative average amount of road capacity required per person
Based on 2011 morning peak period, inbound central London cordon count and national transport modelling assumptions



Roads taskforce final report, chapter 1, page 42

The Roads Taskforce said:

> Given the important role of buses in moving large numbers of people, it is essential that bus reliability and journey times are at least maintained as London grows.

Buses are part of a solution to London's congestion and air quality problem. Improved public health outcomes are also associated with higher levels of bus use because using the bus involves walking[8].

However, bus journey times are getting longer (2% year on year) and reliability has declined because congestion is rising[9]. This decline in bus service performance in London must be reversed. To do this, buses should have priority on all the roads they serve. Too many of London's buses are delayed by congestion because vehicles are legally and illegally allowed to park on the roads they operate on.

There should be more bus lanes operating for longer hours. 24 hour bus lane operation with loading allowed out of peak hours should become the norm. Yellow and red line restrictions on bus routes should operate for longer hours, parking on bus routes reviewed and loading allowed only out of peak hours should become the norm. This would also benefit bicycle users.

Buses should be prioritised at traffic signals and given exemptions where general traffic is banned.

[8] http://content.tfl.gov.uk/improving-the-health-of-londoners-transport-action-plan.pdf
[9] TfL briefing to London TravelWatch, July 2016

Some roads, particularly in busy centres, should become bus, cycle and walking only with access and other traffic restricted. Camden council's proposal for Tottenham Court Road is a model for this approach.

Tottenham Court Road will prioritise bus, cycle and walking. Servicing and taxis will have restricted access

This approach would also substantially benefit cyclists because the lane widths are designed to be wide enough for cycles to safely pass buses and buses pass cycles. London TravelWatch has also welcomed a similar proposal of the City of London for a bus, cycle and pedestrian only Bank junction because these are the most space efficient modes.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Bus

Prioritising the bus is the most important intervention to encourage more bus use because reliability is the most important attribute of the bus service, See section 13.

Public transport passengers do not like to interchange, although it is a routine part of travelling in London. London TravelWatch published its report, *Interchange Matters* earlier this year.[10]

There are some excellent interchanges where passengers can change modes easily. However, more can be done to improve bus stations and interchange between buses on street. Care must be taken not to be complacent about the importance of interchange. London TravelWatch was very concerned that the bus stop outside

[10] *Interchange Matters*: http://www.londontravelwatch.org.uk/documents/get_lob?id=4040&field=file

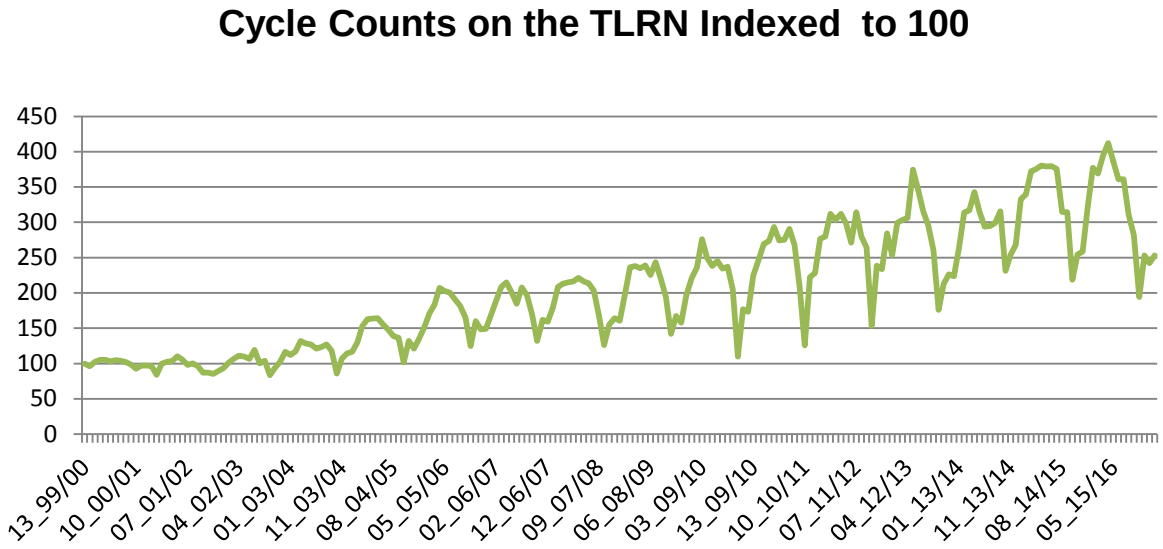
Elephant and Castle Underground station was moved. This is one of the busiest stops in London and now huge numbers of passengers must walk a little further to interchange. This must be avoided if at all possible. Bus stops should be close together and close to the junction where interchange is possible.

The cost of fares are important to passengers, but are also an important tool of transport policy. Higher fares will mean less passengers travel by public transport. In central London this will have only a limited effect because the options are limited, but in outer London, where the car is the alternative, higher fares (and lower fuel costs) will influence passengers to travel by private car.

Cycle

Our general support for the Mayor's cycling target is based on two key considerations – the health and social benefits of cycling, and the importance of cycling as a contributor to the efficient use of scarce road capacity. But, in this latter respect, cycling is not unique. Buses also allow for a very economic use of road space, and there are of course many bus users for whom cycling will not be an option. In our view, it is essential that a careful balance is struck between the interests of cyclists on the one hand and bus passengers and pedestrians on the other.

Cycle use started to rise in 2003 following the introduction of the central area congestion charging zone. The number of cycling trips has been steadily rising. The variation in trips over the year that can be seen in this graph is related to the season.



Cycle use started to rise with the introduction of the central area congestion charge in 2003.

Much can be done to promote more and safer cycling and there should be different interventions on different street types. The Roads Taskforce matrix (see below) identifies 'core roads'. These may be candidates for separated cycle lanes at one extreme. At the other extreme 'local streets', 'town squares', 'city places', traffic reduction, slower speeds and road safety interventions (particularly at junctions where 80% of collisions occur) may be more appropriate. Traffic reduction, by means

of closing streets to general traffic, is a particularly effective way of reducing traffic levels and improving London's un-classified streets for pedestrians and cyclists.

The other street types present different problems in terms of improving conditions for cycling because there will be significant impacts on buses, bus passengers, pedestrians, motor cycles (reduction in lane widths) business loading and general traffic if kerb separated lanes are provided for cycles along with separate green signal time. There are also issues for cyclists in providing separate cycle lanes in busy urban areas. London TravelWatch has called for a comprehensive assessment of the positive and negative impacts of the new cycle superhighways that demonstrate some of these issues.

Walking

All too often walking is taken for granted, but it is an important transport mode both as part of public transport journeys and in its own right. At 9%[11], more than twice the number of Londoners walk to work than cycle. It is clearly space efficient, has public health benefits with no air quality issues. There are no land use issues in terms of providing parking or bus stand space.

[11] Census 2011

As well as not recognising the significant role of walking, there is also too little understanding of what pedestrians want and what will make it easier and increase the amount of walking. The report commissioned by London government in 2004 to look at improving London as a walking city[12] was clear. Pedestrians want a level, clean, clear footway with single stage, direct pedestrian crossing at the locations where they want to cross allowing the shortest possible journey. Pedestrians, particularly older pedestrians, want seats in the public realm and pleasant places to sit and enjoy city life.

This means providing good quality paving, dropped kerbs where necessary. Clearing illegal obstructions and other clutter and barriers to walking such as posts, railings and advertising boards. Most importantly, it means that London's streets need actively managing better than happens at present

Signing is important to pedestrians who want the freedom to occasionally go 'off-piste', but know they can find their way. The Legible London wayfinding system is the best wayfinding system we know of and is being slowly rolled out across London. However, the system is a map based system that is being 'dumbed down' by the use of finger posts that were only ever intended to be used minimally.

Multi-modal trips

All of these modes above, along with rail, can be part of a multi-modal journey. Providing good interchange between modes is important. A good interchange is described in our report: *Interchange Matters*[13]

Taxis and private hire vehicles

Taxis and private hire vehicles play a vital part in London's transport system. Taxis are particularly important for disabled travellers and at times and places where other modes are not available. But these modes are inefficient users of road space. For example, TfL have said that taxis on Oxford Street use 37% of the road space, but carry only 1% of the passengers. Some of London's bus lanes are so heavily used by taxis that there is little benefit to buses, for example along the Strand and Park Lane. Other bus lanes specifically exclude taxis.

In London's busiest locations the volume of taxis and private hire vehicles can be such that bus services are disproportionately affected by the congestion they cause. There should therefore be a means of setting the right incentives for taxis and private hire vehicles. This could be achieved by either pricing mechanisms or restricting access to some sections of the road network.

[12] Towards a fine city for people, Gehl architects, 2004
[13] Interchange Matters: http://www.londontravelwatch.org.uk/our_work/interchange_matters

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

It is widely accepted that the benefits of building new infrastructure in a city with a mature transport network will be lost because of latent or supressed demand. Essentially any new road capacity will soon be taken up by new journeys that do not presently take place because they are constrained by congestion.

A wider, more sophisticated roads pricing system is needed to 'lock in' the benefits of additional new road infrastructure. It may then be the case that additional capacity is useful. Additional infrastructure such as bus only roads ad off road cycle roads may be appropriate in some of London's developing areas where wide scale regeneration is planned.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Many of the interventions described in section 13, and others, would be beneficial on their own. But, they won't result in less congestion because there is too much latent (or suppressed) demand for travel. This means that if some choose to change and travel by more space efficient modes then others will seize the opportunity and use private car, taxi etc. This happened at Henlys corner where, very quickly, more traffic used the higher capacity junction.

There is an exception to the above phenomena and that is within the central area congestion charge zone. Within the zone, the number of vehicles (except those exempted) can be managed by charging. This means that within the zone, if road space is freed up then the intensity of use can be managed by varying the charge.

New roads will encourage more people to drive. This can be avoided by the implementation of a wider more sophisticated system of roads pricing.

16. How should new road infrastructure be funded?

New roads infrastructure should be funded by users, those that will benefit from improved access (developers and landowners) and the taxpayer. This is a similar manner to that which funds rail infrastructure.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

TfL have been actively managing road works. They have established a maximum number of road works as a target. This target is generally met.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

There have been numerous highways schemes undertaken by TfL and the local highway authority to benefit local amenity, cycling and walking. Most of these have

been incremental with small local benefits. They will have, cumulatively led to a reduction in transport capacity.

The Roads Modernisation Programme has had a much greater and immediately apparent impact resulting in a substantial and permanent reduction in road capacity in the central area. TfL have also implemented changes to the traffic light timings further out of central London to manage the traffic towards the central area. This will mean a rise in congestion at locations further out of central London.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

TfL use traffic signally technology to manage congestion. They have been actively increasing the use computer controlled systems to manage signal timing. They are also utilising the same signalling techniques (Active Traffic Management or Gating) that were successfully used during the Olympic Games to slow traffic coming into the central area to enable traffic to continue to flow there.

However, without any mechanism such as pricing to 'lock-in' the benefits the additional capacity that these systems deliver will be lost due to latent demand for travel.

Cameras are a very effective tool in managing parking violations, however since the law was changed recently the London boroughs are unable to use this technology. This change in the law should be reversed. Alternatively, it is now possible for the London boroughs to implement red Route controls that can be enforced effectively by camera.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

We have no knowledge of the operation of this team, however, it is important to note that the team will generally only be active on the TLRN. 80% of the roads that London's buses use are on borough roads that are not covered by a similar operation.

Appendix

Below is a summary of recommendations that respond to the question as to what practical actions could be taken to address congestion in London.

Recommendation 1

Manage demand for road space at the most congested locations and times using pricing, reductions in the availability and price of parking and restrictions to access.

Recommendation 2

There should be more bus lanes operating for longer hours. 24 hour bus lane operation with loading allowed out of peak hours becoming the norm. This would benefit both buses and cycles. Yellow and red line restrictions on bus routes should operate for longer hours, parking on bus routes should be reviewed and loading allowed out of peak hours becoming the norm.

We understand that the London boroughs can now introduce Red Route controls which would allow a higher level of enforcement. This should be considered where buses are delayed by illegal stopping, waiting and loading.

Recommendation 3

Buses should be prioritised at traffic signals and given exemptions where general traffic is banned.

Recommendation 4

Some roads, particularly in busy centres, should become bus, cycle and walking only with access and other traffic restricted in a similar manner to that proposed for Tottenham Court Road.

Recommendation 5

Investment in kerb separated cycle infrastructure should focus on London's busiest, fastest roads that are identified as Core Roads by the Roads Task Force.

Recommendation 6

'Local streets', 'town squares' and 'city places' (as defined by the Roads Taskforce) should have measures to reduce traffic, slow speeds and improve road safety (particularly at junctions where 80% of collisions occur). Traffic reduction, by means of closing streets to general traffic, is a particularly effective way of improving London's un-classified streets for cycling and walking.

Recommendation 7

All streets should have good quality paving and dropped kerbs where necessary. Direct, single stage crossings should be installed at locations pedestrians use most.

Recommendation 8

Illegal obstructions and other clutter and barriers to walking such as posts, railings and advertising boards should be cleared from London's pavements. TfL and London's local authorities should more actively manage and maintain their streets.

Recommendation 9

Provide seating in the public realm and introduce / improve places for pedestrians to sit and enjoy city life.

Recommendation 10

The London boroughs should be incentivised to set up an enforcement team that is focussed on keeping London's bus routes operating as they should.

Government should be lobbied to reverse the recent change to parking regulations, i.e. the grace period for loading bays and the disallowing of camera enforcement.

Licensed Private Hire Car Association

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GLA Transport Committee Investigation into traffic congestion in London

LPHCA Background

The LPHCA is a trade association that represents the interests of Private Hire Operators and their drivers, originally in London but more and more nationally. The Association's membership comprises of nearly 150 companies interfacing to around 15,000 drivers.

For the purpose of this response we will focus on our expertise and knowledge of the London Taxi & Private Hire industry and its associated marketplace in the capital.

The Associations Chairman Steve Wright MBE was formally appointed to the Transport for London (TfL) Board for 8 years having successfully applied for the position following the former Mayor's commitment to have both a Taxi & Private Hire representative. Mr Wright successfully campaigned for licensing in London alongside the late Diana Lamplugh OBE who founded the safety group the Suzy Lamplugh Trust and the Private Hire Board.

Our chairman has also worked closely with the previous Mayor and helped to set up the Safer Travel at Night (STAN) initiative when the GLA took overall responsibility for Private Hire Vehicle (PHV) Licensing in London. He has given evidence to Parliament's transport select committees before London Licensing and worked closely with the Law Commission on their review into Taxi & Private Hire Vehicle regulation.

Mr Wright has previously addressed the London Assembly transport committee on matters concerning Taxi & Private Hire at Marsham Street and several times at City Hall and also worked on ULEZ with TfL.

The LPHCA is very grateful to have the opportunity to work with the London Assembly Transport Committee once again and to have addressed some Committee Members during the oral evidence session of the inquiry.

General questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Yes, more vehicles and greater demand for road space has radically altered traffic congestion and pushed congestion earlier and later and into new areas.

2. What are the key causes of these changes in congestion?

The Cycle super highways, local authority revenue generating parking schemes, poor management of road space, bus lanes, cycle lanes, the increasing population, rickshaws, not having an overall regulatory authority in London (Boroughs and GLA), Residential parking schemes and far too many Road Works.

In addition, TfL's failure to regulate new app only Private Hire Vehicles (PHVs) properly and in accordance with the intention of Parliament and previous regulatory best practice and requirements in London.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Catastrophic, poor air quality, stress, cost and a poorer quality of life.

4. What can London learn from other cities in its effort to reduce congestion?

Tunnel traffic, remove bus lanes and build far more underground and sub-surface rail systems like Crossrail.

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[redacted]

In addition to these general issues, the Committee has identified a number of different approaches to tackling congestion, most of which are already being used by TfL to

some extent. We have posed a number of questions in relation to these different approaches and interventions.

The six approaches outlined below are not necessarily mutually exclusive and could all be used to reduce congestion in London. The Committee will seek to recommend the most effective measures, ensuring an appropriate balance between the competing priorities Londoners have for their road network.

Charging for road usage

TfL already operates the Congestion Charge scheme in central London, and pollution-based charges are in operation or will be introduced.1 Tolling of specific roads such as river crossings has been proposed. The Mayor also has the power to introduce a Workplace Parking Levy.

1 TfL operates the Low Emission Zone, with an Ultra Low Emission Zone and Emissions Surcharge also proposed.

2 For instance this may entail charging vehicles by distance driven, rather than charging for entry to a specific geographical area.

5. How effective is the Congestion Charge? How should this scheme be modified?

Mildly effective. If you have to come into London to deliver you can to a degree moderate the times you travel as demonstrated in the Olympics. If you however have to drop off passengers, get them to an event, station, business meeting, hospital appointment, etc., sometimes with heavy baggage and equipment, its sometimes difficult by public transport. Congestion Charging will not prevent essential journeys being made, if you have to come in, you have to come in!

The absolutely potty idea of potentially congestion charging Private Hire Vehicles (PHVs) an extremely green form of public transport is madness; as PHVs can do 20 journeys in one vehicle rather than have 20 vehicles do the same journeys, have to park, etc.

6. To what extent would a usage-based road pricing regime help reduce congestion?

Extremely Mildly - when will regulators realise as previously stated - if you have to come in, you have to come in! Most parking regimes and many so-called 'parking management schemes' increase delays.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

Time will tell because buying an expensive new vehicle may prove very difficult for many people. The incentives for going greener in no way matches the savings but if you can't afford the outlay - you can't afford the outlay, so like the Congestion Charge you have to pay and it becomes a stealth tax not a solution.

8. What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London

These are all revenue generators - not solutions. Take the idea of a Workplace Parking Levy, it's not going to stop people needing to get to work but when the trains are crammed full and other modes of public transport are not suitable, workplace parking actually stops people parking on the highway.

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[redacted]

Measures to target specific types of vehicle

Heavy road users – like commercial delivery vehicles, minicabs or private cars – could be targeted with specific measures. There could also be efforts to reduce bus traffic.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Give incentives and easier provision for them to deliver off-peek.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Why are you solely targeting minicabs here, which actually reduce congestion when regulated properly? The failure to regulate App Only based PHV operators appropriately by TfL and take on board suggestions from PHV (minicab) industry Trade Bodies and their experts is the cause of some congestion in some areas but studies have shown PHVs reduce congestion.

We have pointed out that 'virtual ranking' should become an offence, which we have called 'clustering'. App Only PHV drivers are 'clustering' in known work areas without a booking, whilst most PHV drivers go to meet a booking or park nearby after completing a booking, these PHV drivers are acting like taxis.

App Only Drivers because their customers often cannot pre-book, simply head for known work areas causing nuisance to residents and others by 'clustering'. This undermines the legitimate Taxi & PHV trades and is outside the ideals of the two-tier system.

App working drivers try to get as near as possible to work so they are displayed on a map on the app (something that we have previously said should also be banned as we believe it's E-hailing).

Taxi over ranking is a congestion causer, so why are taxis excluded from the flawed thinking behind congestion charging PHVs.

The increase in PHVs (not just minicabs) has been caused by TfL appointed agents not auditing topographical testing centres, which allowed PHV numbers to increase, thankfully TfL TPH is now addressing this issue.

The big lie is that PHVs are causing congestion when in the main they reduce it. Road Works, growth in population and the construction of the Cycle Super Highways are the primary causes. We do concede that preventing PHVs from clustering would reduce congestion even more. This has been done successfully at Heathrow Airport.

Congestion Charging PHVs would not improve congestion, proper management and enforcement against clustering drivers will.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Unknown

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Many buses do not run past a lot of people's homes, hence the need for licensed Taxi & PHV door to door modes, which take a lot of elderly, vulnerable, disabled and special needs passengers. Buses are often empty and the majority of people using them are not paying so there's not a good business case to do this either.

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Encouraging modal shift

Greater use of more sustainable transport modes, particularly public transport, walking and cycling, would help address congestion.

These options are fine, if you able bodied and close to termini or pick up points but not an option for many who physically find these modes not viable and in many cases far less safe that pre-booked PHVs, which have door to door security and tremendous safety records.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Tunnel traffic, remove bus lanes and build far more underground and sub-surface rail systems like Crossrail.

Modal shift is a partial solution but not exclusively to large surface and rail solutions, as previously stated PHVs reduce congestion so encouragement for people to use PHVs would have a positive effect.

Providing new road infrastructure

There are proposals for new road infrastructure in London, including river crossings and tunnels, which TfL has considered or is now actively pursuing. These include, for instance, the Silvertown Tunnel across the Thames in east London, and a tunnel from A40 at Park Royal to the A12 at Hackney Wick.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Far more parking and road space sharing, as swathes of road space is expensive to park in at certain times of day or is reserved for residents who are at work - congestion causing and revenue grabbing madness.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

It's questionable as to whether new roads encourage people to drive, the need to get from 'a to b' quickly, cleanly and safely is a far more important factor.

16. How should new road infrastructure be funded?

Use existing road fund license money and fuel duty to fund the roads.

Maximising available road space

Space on London's roads is often restricted by construction work or other roadworks. TfL uses measures such as a lane rental scheme to manage this. In some cases, road space is diverted permanently for other key priorities such as cycling infrastructure or improved pedestrian space.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

Massive increase in fines and enforcement.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

Catastrophic damage. Too wide, under-used, confusing for pedestrians, poor design and no mandate to use where provided.

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Active traffic management

TfL uses technology to monitor and manage traffic, for instance altering traffic signals to respond to incidents causing congestion. It has also recently introduced a Road and Transport Enforcement team to provide an on-street response.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

No Answer as this needs independent evaluation by experts.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

No Answer as this needs independent evaluation by experts.

This concludes the response of the Licensed Private Hire Car Association (LPHCA) and we would like to thank you for the opportunity of allowing us to comment and contribute.

Our views are forthright and considered and as always we are prepared to come before the Transport Committee to answer questions or clarify any of this submission.

Steve Wright MBE Chairman

On behalf of the LPHCA

16th September 2016

national express

London Assembly Transport Committee Traffic Congestion Investigation

We are pleased to have the opportunity to input to the investigation into traffic congestion in London. Please accept this as a formal response on behalf of National Express Ltd, UK Coach (referenced as 'National Express' within this submission).

Congestion is of strategic concern to National Express, as it has a major impact on our business in terms of journey times, reliability, punctuality and customer satisfaction. We have seen urban congestion, and resultant delays, grow at a faster rate than on the strategic road network and the problem in London is particularly acute.

In our experience, the causes of congestion in the Capital can be attributed to a reduction in road space without any reduction in demand for road transport. Available capacity on London's roads has been drastically squeezed in recent years by long-term roadworks, infrastructure developments and the reallocation of road space, particularly through Cycle Superhighways. Since Cycle Superhighway work began, we have seen journey times on our commuter services increase by around 30%. As highlighted by Professor David Begg[1], the fact that this reduction in road space has not been accompanied by stringent enough measures to reduce demand has had severe consequences.

Tackling large-scale congestion requires a range of active traffic and demand-management measures, as well as a concerted effort to change behaviours and specifically encourage people out of their cars. We believe reducing private car use is key to reducing congestion and ensuring road-based public transport remains viable and attractive.

Our ambition, aligned with operational excellence, is that by 2017 90% of our coaches will arrive at their destination within 10 minutes of schedule. Our ability to deliver this on services in and out of London is severely restricted as a direct result of congestion. We would be willing to share directly further information and supporting evidence on journey times and how these have increased.

Coach travel has an important role to play in minimising congestion; a full coach can remove the equivalent of one mile of motorway traffic from the road. On high-volume routes, such as those between London and major airports, the use of double-deck coaches can increase capacity further without taking up additional road space. National Express has recently invested in new double-deck coaches which will be in London from autumn 2016. With greater recognition of the role of coach in encouraging modal shift away from private car, combined with efforts to enhance the coach experience and make it more reliable in London, TfL would be helping to deal with its own strategic problem.

National Express is the largest provider of scheduled express coach services in the UK. Our fleet of almost 600 Euro 5 and Euro 6 coaches operate circa 1200 service journeys a day to and from London, providing vital connectivity to almost 1000 location across the UK. The Kings Ferry is our specialist commuter operation, which has more than 30 years experience delivering high quality, great value commuter coach services. We are part of the consortium that owns Eurolines, the largest scheduled coach operator in Europe. Our Eurolines operation from London Victoria Coach Station facilitates connectivity to and from mainland Europe, covering around 500 destinations across 33 countries.

We have responded directly to the questions where we feel we have sufficient knowledge to do so.

[1] The Impact of Congestion on Bus Passengers, Professor David Begg, 2016.

General Questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

While London has previously led the way in implementing measures to tackle congestion, congestion and journey times have increased considerably in recent years. The current levels of congestion mean that London's road network cannot provide reliable, attractive journey times. The problem is so significant in the Capital that road users and transport operators in particular are increasingly unable to find ways around it by route or timetable alterations.

Both am and pm peak-time congestion remains a challenge, and with overall journey times and delays increasing in London, the 'peak' running times have extended, causing particular problems for commuter transport services.

The congestion problem is particularly severe when an incident occurs, as the volumes of traffic at key sections mean that relatively minor issues can cause lengthy delays. The impact of more significant incidents can be felt widely, with drivers attempting to bypass incidents and closures where there is a lack of suitable, congestion-free alternative diversion routes. However, the more significant impacts are as a result of long term road repair and road improvement schemes which restrict road capacity.

What are the key causes of these changes in congestion?

The volume of planned roadworks, both short and long-term and the resultant reduction in available road space is a significant cause of congestion. The introduction of cycle superhighways has possibly had the single biggest impact on congestion in central London, by substantially reducing road capacity without any simultaneous effort to reduce demand.

Other major infrastructure developments requiring road closures have increased congestion; Crossrail in particular. The forthcoming restrictions due to the closure of Tower Bridge will also have a considerable impact on congestion and this is of particular concern to us, particularly for our commuter services.

Linked to this, we anticipate that Crossrail 2 and specifically the proposal for a shaft at Victoria Coach Station (requiring its closure) will also cause major disruption, given the significance of the station as a transport hub. This is another example of where the impact of infrastructure works on increasing congestion needs to be adequately understood. In this instance, appropriate alternative arrangements for all the vehicles that use the station are vital - i.e. a permanent new coach station operational before any closure of the station. Temporary or on-street arrangements for coaches would create serious additional congestion, in addition to the restricted access caused by the works themselves.

We believe that the increasing number of delivery vans in London is also contributing to congestion, particularly where there is insufficient lay-by facility and they obstruct the highway. Restricting deliveries to off-peak hours would assist with this and we would support some exploration of how this might be incentivised.

While we welcome the efforts made by TfL to co-ordinate planned roadworks with the London authorities, utilities companies and developers, it is important to recognise the extent to which capacity on London's roads is being squeezed and that this will only get worse without more rigorous and comprehensive demand management.

2. What impact *does congestion have on Londoners, the city's economy and its environment?*

Coach is a vital transport mode within London and we believe it is essential that its importance in taking people in and out of the Capital is better recognised. Victoria Coach Station is our London centre and the key destination on the National Express network. Our ability to operate in London is critical to the success of our business and to the delivery of an efficient and reliable public transport network for the Capital, of which coach is an integral part. National Express alone delivered almost 9 million passenger journeys in London in 2015. In addition to Victoria Coach Station, we also serve over 40 smaller bus stops across the capital, as well as key stops in Golders Green, Stratford, Liverpool Street, Paddington and Waterloo.

Coaches provide an affordable public transport alternative to the high-cost of rail and enhance the overall choice for public transport users. Our services are accessible to all, including those on lower incomes. Our commuter services are particularly important in enabling young people to access employment opportunities. We operate 40 coaches each business day carrying circa 550,000 commuters annually from key locations throughout Kent to major employment destinations in London including Canary Wharf, Fenchurch Street, Millennium Bridge and Embankment. At a cost of less than £10 per day, this provides the most cost-effective means of commuting to London from Kent and is considerably cheaper than rail.

Congestion directly impacts on the business costs of transport operators, as the peak vehicle requirement increases to maintain high frequency services on certain routes; the alternative is that service frequencies decline.

Increased congestion and longer and unreliable journey times damage customer satisfaction and ultimately coach patronage. If congestion continues to exacerbate, confidence in road-based public transport will erode and these more affordable forms of transport, such as bus and coach are likely to decline, leading to less choice for passengers.

Clearly congestion also impacts on air quality and we believe that measures to deliver significant air quality improvements must not be viewed in isolation from traffic management and congestion-minimising measures if they are to be successful. It is crucial that the cleaner vehicles operators will need to invest in to comply with the ULEZ can deliver the optimum performance in an urban environment to reduce emissions and improve fuel efficiency savings.

3. What can London learn from other cities in its effort to reduce congestion?

Most major conurbations suffer from congestion, and most employ a range of measures to manage demand for road space.

During 2013 and 2014 closures of the A38 tunnels in Birmingham, the strong and consistent messaging about alternative modes of transport used by Amey and Birmingham City Council encouraged over 200,000 additional journeys to be made by public transport.

London's efforts to deliver the first 'public transport Olympic Games' in 2012 are also a great example of affecting behavioural change, and were largely considered a success. A key element of this was the message to the public about adjusting their travel behaviour, both in terms of transport mode and the time of day they travelled.

While we are pleased that TfL's traffic modelling and active management system implemented for the Games has remained, we would like to see a more sustained campaign in London around alternatives to private car and changing travel behaviours, not just for major events or exceptional conditions.

Charging for road usage

5. How effective is the Congestion Charge? How should this scheme be modified?

We strongly believe that there is a case for demand management based on priorities for vehicles which make the best use of the road space. Road space has to be rationed using traffic management. Certain categories of vehicle, including scheduled bus and coach services, emergency services and certain categories of LGVs should be regarded as priority and management measures employed accordingly.

Any road-pricing or congestion charging scheme should recognise in its pricing structure the fact that buses and coaches have a positive impact on congestion and do more to deter private car use.

Encouraging modal shift

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

We believe that coach as a mode of travel has a critical role to play in encouraging modal shift from private car.

We are disappointed by the regularity with which coach travel is omitted from the public transport debate. Policies tend to focus primarily on rail or bus, often with minimal reference to coach. While traffic congestion impacts negatively on patronage of road-based public transport, it does benefit the railways. However, as highlighted above, not only can rail travel be expensive, it can also be problematic for passengers with large amounts of luggage, particularly when several journey interchanges are required.

Multi-modal connectivity is also important in creating easy, seamless journeys that can rival those of private car. National Express has recently added two key multi-modal hubs new to our network - Paddington and Waterloo, which support integrated, multi-modal transport, by offering improved interchange options and connectivity with London Overground rail services, London Underground, DLR and Crossrail. We also have through-ticketing deal with South West Trains, as well as arrangements with Stansted Express at times of rail disruption.

We would be keen to understand what TfL might do to help incentivise multi-modal transport integration further and to facilitate access to the least congested forms of public transport by road-based public transport users.

We believe that there is scope to further promote coach travel as part of London's integrated transport offer and we are keen to work directly with TfL to progress this further.

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Providing new road infrastructure

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

New road infrastructure will not solve London's congestion problem on its own, and we would not advocate wholesale new road building as a means of tackling congestion. However new infrastructure that alleviates pinchpoints and bottlenecks and which offsets the problems caused by a reduction in road space and narrow highways could be of strategic benefit, as well as prioritising infrastructure maintenance where it impacts on bus and coach operations.

Signal-controlled junctions contribute to congestion and poor traffic flow, particularly in urban areas where they are more prolific. However there is an opportunity at these junctions to demonstrate priority given to public transport and we would like to see buses and coaches benefitting from this as much as possible.

We are supportive of priority measures including bus lanes and corridors in urban areas. As an example the busway in Bedfordshire, has had a very positive impact on our journey times, and in comparison to much larger transport infrastructure projects schemes such as these can offer value for money and be cheaper to maintain.

It is important that coaches have the same priorities as buses, given the role of coach within the public transport offer and the efficient use of road space it delivers.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

The risk that new roads will simply encourage more people to drive is extremely high, as the cost of private car use is not a significant enough deterrent. Any new road infrastructure needs to be accompanied by stringent demand management measures that prioritises modal shift away from private car.

We are willing to work directly with TfL to share relevant information and intelligence to help tackle congestion and improve journey times in London. If we can be of further assistance in relation to this investigation, please contact [redacted].

We look forward to the outcome of this investigation.

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WEMBLEY OFFICIAL COACH SUPPLIER

Response from the National Joint Utilities Group (NJUG) London Assembly Transport Committee investigation into traffic congestion in London

About NJUG

The National Joint Utilities Group (NJUG) Ltd is the UK's only cross-sector trade association representing utility companies, their contractors and a range of Affiliates that provide a range of goods, materials and equipment and services that support NJUG's Vision for Street Works.

NJUG is also the utility arm of the Highways Authorities and Utilities Committee (HAUC(UK)) which brings highway authorities, utilities and government together to reduce the impact of street and road works on members of the public throughout the UK.

We have a long record of working constructively with, and supporting Transport for London (TfL) to develop street works policies that deliver the required objective but are also fair, proportionate and achievable.

NJUG welcomes the opportunity to contribute to this wide-ranging and important investigation into traffic congestion in London.

Executive Summary

- Utilities are major contributors to the British and London economy – contributing an estimated £1.6 billion annually to the British economy. In 2014-15, there were an estimated 1.37 million utility street works in England and Wales.
- Over 50% of works in the street are undertaken by local authorities – Londoners will only truly benefit if road and street works are treated equally.
- London's population, housing and infrastructure growth requires utility services. These factors, however, are coupled with limited scope for London's roads to provide additional capacity.
- Local authorities already have all the existing powers needed to manage utility street works and dictate when and where street works should take place. Rather than additional legislation, or the extension of existing legislation, it is imperative that local authorities use these existing powers effectively and consistently.
- NJUG is aware that the Committee are examining the effectiveness of lane rental schemes. The Government-commissioned Ecorys report found that "Lane Rental leads to an increase in costs to promoters and ultimately to utility customers and taxpayers" and, "that most of the observed changes would have taken place anyway, without Lane rental".
- NJUG estimates that if lane rental schemes were rolled out across all local authorities in England and Wales, and utilities incurred lane rental charges, as opposed to working out-of-hours instead, it would lead to an additional £12 per customer per year being added to customer bills.
- NJUG believes that the combination of more effective coordination between utilities and highway authorities and the adoption of innovative ways of working are imperative to reducing the size and duration of works. Therefore, there needs to be greater incentives and investment in innovation, more holistic planning and coordination, better alignment of local authority and utility timescales, and more use of 'workathons', amongst other things.

Utilities are a major contributor to the British and London economy

Up until recently there was no data to demonstrate the scale of investment utilities are making in their networks through the undertaking of street works. Last year, NJUG commissioned PA Consulting to construct an econometric model outlining the current cost of undertaking street works and the estimated cost of certain policy scenarios. Based on this analysis, utilities invest £1.6 billion annually in upgrading, expanding and connecting new customers to their networks. This investment ensures the safe, secure and reliable supply of utility services which underpin economic growth both directly and indirectly, by connecting new businesses and consumers. This inevitably involves digging up the road, where safe and practical to do so, but NJUG and its members have been working hard, and continue to work hard, to reduce the impact of these essential works.

In 2014-15, there were an estimated 1.37 million utility street works undertaken in England and Wales. However, over 50% of works in the street are undertaken by local authorities themselves as part of their road maintenance / repair programmes.

Utilities undertake street works for five main reasons - safety; security of supply; to connect new customers or enhance existing customers' supplies, to divert utility apparatus to facilitate major projects like the Olympics, Crossrail or HS2, and deliver Government objectives like superfast broadband.

NJUG fully supports TfL's efforts to minimise disruption and these tally with our focus on minimising road occupation through improved collaboration and innovation. As outlined in the London Infrastructure Plan 2050[1], these efforts are against a backdrop of rising population in London (expected to increase 37% between 2011 and 2050), a 43% forecasted increase in passenger vehicle miles between 2013 and 2030[2], and the need to meet huge housing and infrastructure demands (including 49,000 new homes a year according to the London Infrastructure Plan 2050). This is coupled with limited scope for the London's roads to provide additional capacity. All of this growth requires the provision of utility services and NJUG fundamentally believes that the Government, local authorities and utilities must all work together to minimise road occupation, which can be done best by even greater collaboration of works as well as through developing innovative techniques to reduce the duration and size of works.

Traffic congestion in London

As the Committee's call for evidence highlights, London's congestion has increased due to a variety of factors – not least increases in certain vehicles (minicabs, delivery vans and construction vehicles), a reduction in road capacity due to cycle lanes, pedestrianised areas and landscape; and construction work. There are now 110,000 private hire drivers and more than 80,000 private hire vehicles in London[3] and the number of vans on London's roads increased by 10% between 2011 and 2014[4]. Meanwhile, as TfL have highlighted, significant

[1] London Infrastructure Plan 2050, Mayor of London https://www.london.gov.uk/file/19038/download?token=1Zj5uQZf

[2] INRIX, The future economic and environmental costs of gridlock in 2030, 2014: http://inrix.com/wp-content/uploads/2015/08/Whitepaper_Cebr-Cost-of-Congestion.pdf

[3] Transport for London & Mayor of London, Taxi and Private Hire Action Plan 2016: http://content.tfl.gov.uk/taxi-and-private-hire-action-plan-2016.pdf

[4] Mayor calls for new measures to secure the success of London's roads, 2016: https://www.london.gov.uk/press-releases/mayoral/mayor-calls-for-new-road-improvement-measures

capacity for motor vehicles (up to 30%)[5] has been 'lost' in central London as a result of various measures.

London is home to a significant amount of developments and these works themselves cause disruption as vehicles queue to make deliveries and also remove soil and demolition debris. There is a direct correlation between increased development of major transport and urban regeneration projects and street works to deliver and provide gas, electricity, water, sewerage and broadband services to London's businesses and Londoners themselves. Indeed, every development itself, whether it is a house, commercial development, a cycle rank or an electric vehicle charge point, requires utility services to ensure these projects deliver for Londoners.

NJUG strongly believes that if Londoners are to truly benefit, any policy measures must treat utility street works and highway authority road works equally.

The impact of congestion on Londoners and the economy

NJUG recognises the impact that congestion has on all of us and has been working hard with TfL, London boroughs and our members to reduce the regrettable disruption that sometimes arises from essential utility works. Increased congestion also has a direct impact on utilities and contractors undertaking street works – utilities have standards of service to meet when undertaking emergency works and when connecting new customers. Pipes, cables, ducts and materials are needed to ensure the completion of these works in a timely manner. Congestion inevitably increases the duration of works.

TfL, working with NJUG and utilities, has driven greater collaboration in London – including through 'Workathons' where numerous companies are invited to take advantage of a road closure and come in and undertake short-duration works. For example, in 2015, during the installation of a new traffic island on Battersea Park Road, TfL arranged for UK Power Networks and Openreach to dovetail their works for the US Embassy and some Virgin Media and Thames Water connection works were all undertaken at the same time – saving 45 days of disruption.

Similarly, the Borough High Street Blueprint, winner of the 2010 NJUG Partnership Award, involving TfL, Southern Gas Networks, UK Power Networks and Morrison Utility Services worked together collaboratively and in doing so saved more than a year (384 days) in highway occupation – a figure calculated independently by TfL. More recently, in Brownhill Road, TfL worked with utilities to undertake works whilst they closed the road for road maintenance work, saving 20 days of disruption.

The City of London Communal Entry Chambers and Early Installation Initiative encouraged developers to introduce communal entry chambers for telecoms providers' apparatus and other utilities, which in 2013 led to a total of 396 days saved in highway occupation.

What can London learn from other cities in its efforts to reduce congestion?

In the UK, NJUG believes that TfL and the Mayor working with London utilities have been at the forefront of reducing the unfortunate disruption arising from road and street works. The London Code of Conduct, introduced in 2009/10 by the London Mayor, saved 2311 days in its

[5] The vision and direction for London's streets and roads, Roads Task Force report: http://content.tfl.gov.uk/rtf-report-chapter-1.pdf

first two years. Together with the existing Noticing and Permit Scheme legislation (which originated from New York), TfL and London boroughs have all the necessary powers needed to manage works.

NJUG is working closely with stakeholders around the country to collaborate more effectively:

- The Ebbsfleet Development Corporation – which aims to develop 15,000 homes and 6m square metres of commercial development in the next ten years – and our members are working to install apparatus in utility corridors before much of the housing is built.
- Staffordshire County Council are working with NJUG and the Future Cities Catapult on the 'Heineken' project – which is not only routinely collaborating works but is establishing a hub – where colleagues from utilities and authorities can co-habit to plan works together.
- In Manchester – NJUG is working with the City Council to collaborate utility works with the major regeneration around the station and trams.
- The Bristol Code of Conduct, which built on the London Code, has delivered over 250 days' saved disruption in its first two years.

Local Authorities have all of the existing powers to manage utility street works

As the legislation currently stands, local authorities already have a myriad of powers with which to manage utility street works: Local authorities have a Network Management Duty to manage their road network effectively to ensure the expeditious movement of traffic and pedestrians, and a statutory duty to co-ordinate road and street works, with utilities required to co-operate. Therefore, local authorities already have powers to dictate when and where works take place, including a minimum notice of 3 months for major works; and through permit schemes, any utility wishing to dig up the street must apply for a permit to work from the local authority, which confirms when and under what conditions works can take place. In addition, local authorities already have the power to compel utilities to come back and undertake remedial works within a specified time period – and at the utility's own expense.

London boroughs operating within the London Common Permit Scheme (LOPS) often take different approaches and vary their interpretation of the Statutory Guidance for Highway Authority Permit Schemes and supporting Advice Note on how highway authorities were required to implement the changes from 1st October 2015.

It is imperative that local authorities use the powers that are already available to them effectively and consistently. Doing so would negate the need for further legislation or regulation including the wider roll-out of lane rental schemes.

Lane Rental Schemes

The lane rental pilot schemes in Kent and London require utilities working in the busiest streets during traffic-sensitive (rush-hour) times to pay up to £2,500 per day. By working outside these times a utility can avoid the charge, but will incur additional costs for evening / night-time working or reduced productivity, which could extend the period of road occupation by returning the road to service each day using plating. Additionally, increased noise at night is often unpopular with local residents. NJUG believes that the existing legislation and voluntary Codes developed by the utility industry in co-operation with local authorities, are already delivering reduced disruption at significantly less cost. Indeed, utilities are already working with authorities to decide the best time to undertake works where safe and practical to do so.

The Government-commissioned Ecorys report into lane rental schemes[6] found that "Lane Rental leads to an increase in costs to promoters and ultimately to utility customers and taxpayers" and, "that most of the observed changes would have taken place anyway, without Lane rental". Based on the analysis that NJUG commissioned PA Consulting to undertake, if lane rental schemes were rolled out across all local authorities in England and Wales, and utilities incurred lane rental charges (as opposed to working out-of-hours instead), the total annual cost of undertaking street works would increase by nearly £327 million. This would lead to an additional £12 per customer per year added to customer bills.

NJUG's suggested solutions for easing congestion due to road and street works

We believe that the following measures can ensure that road and street works minimise disruption:

- **Greater Investment in Innovation** - Utilities are also innovating and importing technology from across the globe, including: National Grid keyhole technology which repair gas mains and reduce a 5-day job to a 5 hour job and reduces the area of excavation from 5m² to a 0.6 m² excavation; the National Grid Vision of a 'No-Dig Network' and TORS (Tier One Replacement System); Southern Gas Networks CISBOT, which uses robots to repair live gas mains and negating the road being dug up at all. Further developments in internal replacement technology are currently going through a rigorous R&D process and this includes replacing mains from the inside out.

- **Deliver a period of policy stability**, with no further additional legislation or regulation, ensuring that local authorities effectively and consistently use the existing range of powers already available to them to dictate when and where works take place;

- **Ensuring that the greater incentives to minimise disruption apply equally**, given that over 50% of road works are carried out by authorities' own highways teams / contractors. Londoners will only truly benefit if road and street works are treated in the same manner; and this could include the removal of any costs or charges applied to the works if they are completed quicker or outside peak hours,

- **Focusing on making holistic planning and coordination of road and street works the norm** – statutory undertakers and local authorities working together from the outset leads to a demonstrable reduction in road occupation e.g. Bristol Code of Conduct, Staffordshire Heineken Project; Manchester city Centre Regeneration and Ebbsfleet.

- **Better alignment of local authority and utility planning timescales** - the disparity of timescales that exists in investment planning between utilities and local authorities has a detrimental impact on future infrastructure and street works planning. Gas, water and electricity utilities' investment programmes are agreed with their economic regulators over 5 to 8 year periods, which enables them to plan how best they can deliver their investment programmes, with the least disruption to customers and road users, over this period.

[6] Street Works Lane Rental Evaluation, A report to the Department for Transport Ecorys with input from TJH Consulting, 2015: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509203/ecorys-lane-rental-report.pdf

Greater certainty in funding plans from a local authorities' perspective would enable utilities and local authorities to coordinate their medium-term investment plans.

- **Consistency** - Ensuring that London boroughs operating within the London Common Permit Scheme (LOPS) interpret the Statutory Guidance for Highway Authority Permit Schemes consistently. Doing so, would reduce the amount of unnecessary delays, allowing statutory undertakers to do the job faster and return the road to service faster.

- **Greater Use of 'Workathons' for planned works** – as previously highlighted 'workathons' involve taking advantage of a road or lane closure to make an area or a whole road available for a short time for utilities, authorities, developers etc. to undertake any works. The Borough High Street Blueprint, winner of the 2010 NJUG Partnership Award, involving TfL, Southern Gas Networks, UK Power Networks and Morrison Utility Services worked together collaboratively and in doing so saved more than a year (384 days) in highway occupation – a figure calculated independently by TfL.

NJUG would be pleased to facilitate a site visit for members of the Transport Committee to view collaborative works being undertaken by our members in conjunction with our highway authority colleagues. We would also be happy to provide further evidence on any of the aforementioned points made in this response.

No to Silvertown Tunnel - submission to London Assembly Transport Committee congestion investigation, September 2016

The Silvertown Tunnel is a planned road tunnel that would run under the River Thames between the Greenwich Peninsula and the Royal Docks. No to Silvertown Tunnel is a campaign set up by local residents to oppose the scheme.

We believe the Silvertown Tunnel, if built, will fail in its objective to relieve congestion, and lead to worse jams and worse pollution in both east and south-east London.

This response aims to answer questions 14, 15 and 16. We would be happy to address the committee about the issues raised. You can find out more about the issues surrounding the Silvertown Tunnel, and our campaign, at www.silvertowntunnel.co.uk.

Can new road infrastructure help reduce traffic congestion?

1. It is well-known that road-building generates more traffic. This is borne out by evidence reviewed for the UK Department for Transport by the Standing Advisory Committee on Trunk Road Assessment (SACTRA)[1] in 1994 and further evidence reviewed by the University of Toronto[2] in 2011. Many more studies attest to the evidence.

2. Attempting to fix congestion by building new road infrastructure is, therefore, counterproductive. At the Silvertown Tunnel, even with tolls, Transport for London envisages increases in traffic heading southbound in the evening peak, into the already congested A102/A2. Tolling also risks sending further traffic to the nearest free crossing at Rotherhithe, resulting in increased congestion in Greenwich, Deptford, Poplar and Limehouse.

3. The surrounding road network simply cannot cope with even a small increase in traffic. TfL admits to capacity issues on routes on both sides of the river.[3] Any short-term gain from temporarily unblocking the northbound Blackwall Tunnel bottleneck would be wiped out by increased congestion on the A1020 Lower Lea Crossing (which already struggles to cope with

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[1] *Trunk Roads and the Generation of Traffic*, 1994
http://webarchive.nationalarchives.gov.uk/+/http:/www.dft.gov.uk/pgr/economics/rdg/nataarchivedocs/trunkroadstraffic.pdf

[2] *The Fundamental Law of Road Congestion. Evidence From US Cities*.
http://www.environment.utoronto.ca/News/RoadExpansionStudy.aspx

[3] Silvertown Tunnel Preliminary Transport Report, paragraph 4.2.32
http://content.tfl.gov.uk/preliminary-transport-assessment-chapters-01-to-08.pdf

ExCeL exhibition traffic[4]) and A102/A2 southbound through Kidbrooke and Eltham, which is already beset by daily southbound queues[5]. In effect, the Silvertown Tunnel would displace traffic congestion from one spot to elsewhere, rather than relieving it.

4. Even former mayor Boris Johnson, who was a strong advocate for the scheme, admitted the Silvertown Tunnel will put more pressure on the road network[6]. Greenwich Council's consultants have also warned that the proposals as they stand, which contain no accommodation for public transport, pedestrians or cyclists, will overwhelm local roads[7].

The Silvertown Tunnel and air quality

5. We have conducted three "citizen science" air pollution studies, which show the already-frightening levels of air pollution in areas close to the Blackwall Tunnel approaches.

6. One reading showed nitrogen dioxide levels of 104 microgrammes per cubic metre by the A102 at Bramshot Avenue, Charlton[8], on a route used by children heading to primary and secondary schools in the area. This road is expected to have to cope with extra traffic if the Silvertown Tunnel is built.

7. Tunnel supporters like to compare the east side of London with west London, where there are far more road crossings, claiming a new crossing at Blackwall will relieve air pollution issues[9][10]. This simply is not the case. These bridges are jammed with traffic on a daily basis in rush hour

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[4] Local resident's video: https://www.youtube.com/watch?v=6gUe3NYsYlI

[5] No to Silvertown Tunnel video:
http://www.silvertowntunnel.co.uk/2014/10/22/video-tfls-silvertown-tunnel-wont-cure-blackwall-tunnel-congestion/

[6] *Ask Boris*, LBC, 1 April 2014 http://www.lbc.co.uk/ask-boris-1st-april---watch-in-full-89825
Transcribed by the Boris Watch blog
http://www.boriswatch.co.uk/2014/04/02/more-lbc-transcripts-east-london-river-crossings/

[7] Eltham DLR extension feasibility study, Hyder Consulting, obtained via Freedom of Information Act
http://853blog.files.wordpress.com/2014/04/eltham_dlr002.pdf
https://www.whatdotheyknow.com/request/silvertown_falconwood_hyder_cons

[8] No to Silvertown Tunnel 2014 air pollution study
http://www.silvertowntunnel.co.uk/our-study/2014-silvertown-tunnel-pollution-study-results/

[9] Newham councillor Conor McAuley quoted in the Newham Recorder, 26 January 2013
http://www.newhamrecorder.co.uk/news/big_debate_newham_councillor_and_tower_hamlets_resident_argue_for_and_against_more_river_crossings_1_1829083

[10] Greenwich councillor Harry Singh, question 36, full council meeting 30 January 2013
http://committees.greenwich.gov.uk/documents/s25825/Minutes%20Appendix%20A%20-%20Public%20Questions.pdf

and residents in Putney[11] and Battersea[12] complain of high pollution levels. In 2015, Putney High Street exceeded its yearly legal limit of nitrogen dioxide levels in a week[13]. It has since been declared a "green bus corridor"[14]. More crossings do not equal less pollution.

The Silvertown Tunnel is no solution to traffic congestion

8. We're fully aware there is a problem with traffic at the Blackwall Tunnel. We know because we live here. But building a third tunnel there is no solution. It will exacerbate other bottlenecks. And we regret that local politicians in Greenwich, Newham and Tower Hamlets are falling into line with discredited and outdated schemes such as the Silvertown Tunnel. Indeed, in Greenwich's case, it actively promoted it in its council newspaper and on street stalls[15] - rather than backing sustainable schemes for our capital's future needs. We are grateful that other boroughs - particularly Lewisham[16] and Hackney[17] - have properly scrutinised the scheme, and found it wanting.

9. We also doubt that a new crossing between Greenwich Peninsula and the Royal Docks will act as an economic boost. In London, it has been public transport investment that has brought investment into areas. Canary Wharf only really began to take off after the Jubilee Line opened in 1999, while areas such as Brockley and Shoreditch have been boosted by the new London Overground service. In the Royal Docks, development is already taking place on the Royal Wharf and City Island developments without the addition of a new road tunnel, while development is accelerating at Greenwich Peninsula.

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[11] Putney Society http://www.putneysociety.org.uk/news-and-issues/air-pollution-in-putney.html

[12] *Wandsworth Guardian*, 4 February 2014
http://www.wandsworthguardian.co.uk/news/10983607.Groups_join_forces_to_tackle_high_levels_of_air_pollution_in_Battersea/

[13] *CityMetric*, 7 January 2015
http://www.citymetric.com/horizons/some-london-streets-have-already-hit-their-pollution-limits-entire-year-618

[14] Wandsworth Council press release, 9 August 2016
http://www.wandsworth.gov.uk/news/article/13467/putney_to_be_london_s_first_low_emission_bus_zones

[15] *Greenwich Time*, 4/11/18 December 2012, 8/15/22/29 January 2013
http://www.royalgreenwich.gov.uk/greenwichtime

[16] Lewisham Council representation to Silvertown Tunnel planning process
https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/?ipcsection=relreps&relrep=25261

[17] Hackney Council representation to Silvertown Tunnel planning process
https://infrastructure.planninginspectorate.gov.uk/projects/london/silvertown-tunnel/?ipcsection=relreps&relrep=25346

Tolling the Silvertown Tunnel shows it will not work

10. TfL's need to toll the Silvertown Tunnel and the Blackwall Tunnel shows how unworkable this scheme is. It is unlikely that the low toll charges - just £1 for a car in off-peak hours, with some journeys charged at £3 in peak hours[18] - will prevent a huge increase in traffic using this corridor. There is no incentive to use public transport where it is available. A bus journey (£1.50) is more expensive for a single traveller at off-peak hours, while the Emirates Air Line (£3.50) will always be more expensive[19]. Conversely, higher tolls would compel drivers to use the nearest free crossings at Rotherhithe Tunnel and Tower Bridge, exacerbating congestion elsewhere, including the Maritime Greenwich World Heritage Site.

11. If TfL genuinely believed that tolling a single section of the network would reduce unnecessary demand, it could apply the charges to the Blackwall Tunnel tomorrow - saving the expense and bother of spending £1billion on a new road. However, it refuses to do so[20].

12. TfL's own traffic forecasts show the Silvertown Tunnel would increase northbound traffic flows in the morning peak by 37%[21]. Even if the perennial queues at the Blackwall Tunnel entrance clear, it is not clear how the local road network in Poplar, Silvertown and Canning Town is meant to absorb this influx of extra traffic, which will include HGVs currently prohibited by the restrictive nature of the northbound Blackwall Tunnel.

13. Furthermore, southbound flows in the afternoon peak are due to increase by 35%[22] - but most of these drivers are simply doomed to join the existing queues on the A102 and A2 through Sun-in-the-Sands and Kidbrooke, increasing congestion and pollution on this corridor and adding to costs for businesses who depend on a reliable road network.

What infrastructure is needed to cut congestion?

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[18] Silvertown Tunnel Preliminary Charging Report
http://content.tfl.gov.uk/preliminary-charging-report.pdf

[19] No to Silvertown Tunnel response to 2015 TfL consultation, section 4.16
http://www.silvertowntunnel.co.uk/wp-content/uploads/2015/11/NtST_2015_consultation_response_with_footnotes.pdf

[20] Mayor's Question Time, answer from Boris Johnson to Caroline Pidgeon AM, 19 November 2014
http://questions.london.gov.uk/QuestionSearch/searchclient/questions/question_278496

[21] Silvertown Tunnel Traffic Forecasting Report, figure 4-1
http://content.tfl.gov.uk/st-silvertown-traffic-forecasting-report.pdf

[22] Silvertown Tunnel Traffic Forecasting Report, figure 4-2
http://content.tfl.gov.uk/st-silvertown-traffic-forecasting-report.pdf

13. Any solution to the problem of cross-river congestion should be looked at in the context of cutting congestion levels across east and south-east London as a whole - such as dropping tolls at Dartford, to keep unnecessary traffic off the A2, A102 and A12. Traffic from outside London - say, Maidstone to Enfield - shouldn't be using inner London to get there in the first place - yet the current tolling regime at Dartford incentivises them to do so.

14. Road pricing across London - rather than at specific points - should be considered to get traffic levels down to sustainable numbers. The technology already exists to do this. Otherwise, building new roads will simply overwhelm east and south east London with congestion.

15. People in east and south-east London also need to have the public transport alternatives that west Londoners enjoy. We would like to see better public transport connections across the Thames, such as extending the London Overground from Barking to Thamesmead and Abbey Wood, and pedestrian and cycle connections from Canary Wharf to both North Greenwich and Rotherhithe. The emphasis should be on making connections like these, not on urban road-building.

From: [redacted]k>
Date: 14 August 2016 12:35:17 BST
To: '[redacted]
Subject: Transport for London Congestion survey

Dear Georgina,

I would suggest that across all modes of transport I would be surprised if congestion has increased, since journey times for my chosen mode of transport (cycling) have likely remained stable. Given the significant uptick in cycling, which is in general the fastest way to get around central London, I would be interested in whether in reality for ALL travellers journey times have increased (I also frequently use buses, but rarely wait a long time since I use an app to tell me when buses are coming).

1. I have not noticed any significant congestion on my particular route in to London, outside of that just outside the Oval and only whilst cycling infrastructure was put in (e.g. This was temporary).

2. The cause is too many private cars, taxis and Uber drivers; cycles much more efficiently use the road.

3. Congestion causes respiratory illness and the particulate emissions are very high. I say this as a research scientist with a particular interest in this area.

4. More cycling infrastructure - learn from the Netherlands

5,6,7,8 all good ideas.

9. Charge congestion charge per hour

10. Don't know. Would not restrict Uber, it is more convenient and better than black cabs

11. Very significant. We do not own a car but do use zipcar when necessary. Reduce private use of road space (parking) replace by zipcar and more on road cycle parking.

12. Unsure

13.more cycling infrastructure, ditch quiet ways

14. More cycling infrastructure

15. Ensure appropriate protected cycle infrastructure

16. Congestion charge / tolls

17. Don't know

18. Has reduced congestion by encouraging more efficient road use

19. Don't know

20. Don't know

Many thanks,

Paul Fennell (Professor)

Sent from my iPhone

PHIL JONES ASSOCIATES
transport planning consultants

Caroline Pidgeon MBE AM
London Assembly Transport Committee
Greater London Authority
City Hall
The Queen's Walk
London
SE1 2AA

02 September 2016
Your ref:
Our ref: 1468

Dear Ms Pidgeon

Investigation into Traffic Congestion in London

Thank you for inviting me to submit my views on what the Mayor and Transport for London can do to reduce congestion in the capital.

My response essentially responds to Questions 4, 13 and 14.

While there has been substantial and welcome progress in recent years, it is widely acknowledged that much more needs to be done to reduce the number of journeys made by private car, which is the most inefficient use of scarce road space and the cause of much of London's congestion. A high proportion of journeys are short, say less than 5 miles in length, and are capable of being walked and cycled by most people. It is also now well understood, particularly following the opening of the most recent set of cycle superhighways, that the only way of enabling a massive increase in cycling is to provide routes that feel safe to use. On main roads this means physically separating cyclists from large flows of motor traffic.

While TfL has been very successful in doing this, we know from direct experience on working on cycle superhighways and through our International Cycling Infrastructure Best Practice Study for TfL of 2013, that there are significant regulatory problems in achieving UK infrastructure that meets world class standards. This is largely because the UK, unlike most other countries, does not have clear rules requiring motor vehicles to give way when crossing the paths of pedestrians and cyclists, including at traffic signals.

As a result it is often deemed impossible to fit pedestrian and cycle facilities at signalised junctions due to the impact they will have on traffic capacity, and due to physical constraints on space. Where facilities are provided they often require pedestrians and cyclists to negotiate a junction in a complex series of stages, adding to their delay and making the journey much less attractive.

While having separate stages may appear to be beneficial in safety terms, these benefits will only accrue if everyone obeys the signals. The delays faced by pedestrians and cyclists often means that they will cross outside the short designated period, and thus put themselves at risk. We also note that countries such as the Netherlands and Denmark, which use the give way on turning system, have very good safety records for pedestrians and cyclists.

LOCATION Seven House
High Street, Longbridge
Birmingham B31 2UQ
TELEPHONE [redacted]
EMAIL [redacted]
WEBSITE philjonesassociates.co.uk

In the 1980s the Greater London Council and the Department of Transport explored how give way on turning at traffic signals (while still meeting the need for safe pedestrian crossing facilities) could be introduced to reduce congestion, and were on the point of trialling this in practice. The RAC Foundation, in its report 'Every Second Counts' of 2011 also identified the potential gains that moving to the more commonplace give way on turning system could yield. The current policy imperative to provide properly for cycling only adds to the justification for reopening this possibility.

Following a series of study tours to Denmark, including with the then Roads Minister Robert Goodwill, we were commissioned by British Cycling to carry out research into the benefits that would accrue from strengthening the requirement for motor vehicles to give way to pedestrians and cyclists when turning, at both traffic signals and at priority junctions. I will send a copy of our report 'Turning the Corner' with this letter by email. In that report we call for detailed consideration of a series of changes to the Highway Code, to traffic regulations and to statute law.

We see significant potential benefits from making these changes:

- Improving the comfort and safety of pedestrians and cyclists throughout the network
- Enabling the provision of high quality infrastructure at a greater number of junctions
- Making junction layouts more efficient for all road users

We understand that introducing these changes would need to be researched very carefully and would be challenging, but it is our strong view that the benefits to be gained are so significant that they must be considered. We call on the support of London in raising these issues with Government.

As a final comment, I remember that when I visited the cycling infrastructure team in the New York DoT as part of our international cycling infrastructure study for TfL, I explained how traffic signals worked in London, with all traffic having to be stopped to allow pedestrians to cross. One of the engineers commented 'So you have, like, congestion then?'. Yes we do, I replied.

Yours sincerely

Phil Jones
Managing Director

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

The roads are more congested throughout the day.

2. What are the key causes of these changes in congestion?

There has been an explosion in the number of private hire vehicles operating in London. We are aware of Birmingham taxis operating in London on the *Uber* platform.

This has arisen from the decision by Transport for London to license *Uber* and similar apps. Also, as a result of TfL failing to enforce existing rules (which limited the right to "ply for hire" to taxis) in virtual fora – ie e-plying for hire/ plying for hire via mobile phone apps.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Slower journey times (meaning lower productivity and higher costs) and lower air quality (leading to the elevated occurrence of respiratory disease and shortened life spans).

4. What can London learn from other cities in its effort to reduce congestion?

All other major cities have taken a more mature and confident approach to regulating *Uber* and its ilk. As well as comparable cities, less powerful ones/ ones in smaller jurisdictions have also managed to take more effective and timely steps to impose and enforce proportionate limits on the operation of mobile phone app booking services. That London has not managed to, may signal how ineffectual/ under-resourced, the city's governance systems have become.

5. How effective is the Congestion Charge? How should this scheme be modified?

PHVs should be required to pay the Congestion Charge. Private enterprise has much more flexibility over the level of its fares – ie it has the ability to factor the Congestion Charge into its price structure.

6. To what extent would a usage-based road pricing regime help reduce congestion?

Such a road pricing regime, without adequate allowances being made, could have a disproportionately negative impact on road users whose work necessarily is dependent on the use of their vehicle (eg taxi drivers, hauliers).

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

8. What would be the benefits and drawbacks of these other interventions? - Tolling for river crossings or other major infrastructure - Workplace Parking Levy - Devolving Vehicle Excise Duty to London

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

There has been an explosion in the number of private hire vehicles operating in London. We are aware of Birmingham taxis operating in London on the *Uber* platform.

This has arisen from the decision by Transport for London to license *Uber* and similar apps. Also, as a result of TfL failing to enforce existing rules (which limited the right to “ply for hire” to taxis) in virtual fora – ie e-plying for hire/ plying for hire via mobile phone apps.

We seek the revocation of the licences issued to *Uber* and similar mobile phone apps which have permitted them to operate in London.

We propose that TfL table in Parliament a statutory definition of plying for hire.

As a minimum, we propose that *Uber* and similar mobile phone apps not be able to show to passengers images of where its vehicles are located (ie a prohibition on virtual plying for hire).

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

We are concerned that a greater emphasis on car clubs may lead to rise in car pooling/ ride sharing (ie unlicensed drivers carrying members of public). We are concerned that this would lead to a rise in unlicensed drivers with negative implications for passenger safety.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

16. How should new road infrastructure be funded?

17. How effective are TfL’s measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

The provision of cycle lanes and advance stopping areas has slowed journey times. Specifically, road capacity has shrunk and slow-moving bicycles at the head of traffic depress normal acceleration speeds.

The increase in the number of people commuting by bicycle is not something to celebrate or encourage. It is an indication of how slow road transport has become and how congested Tube/ rail options are.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

We support the collection of data that will enable more precise analysis of transport flows. However, we are concerned about the security of this data and are opposed to it being published.

In particular, we are concerned about this data being improperly used to aid companies to identify passenger hot spots. We believe that such misuse of the data (ie not for analytical, but for commercial purposes) would exacerbate congestion and encourage illegal plying for hire/ touting.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

We are concerned at the hitherto relatively low levels of enforcement, compared to Birmingham and we welcome the decision of the new Mayor to increase the size of the enforcement team.

From: Andrew Halliday [redacted]
Sent: 02 September 2016 12:52
To: Georgina Wells
Subject: Coach Operator Response to London Assembly : Investigation into Traffic Congestion in London

Dear Georgina

Please find below some initial responses to your consultation into traffic in London. I would be pleased to elaborate on some/all of these at a later date and/or engage with you in other ways to assist the consultation process. I have responded on a question-by question basis using the question numbers in the document. In some instances we have no specific comment to make at this stage and I hope that this will not invalidate the responses we have made to other questions.

Safeguard Coaches Limited is a privately owned bus and coach operator based in Guildford and Farnham in Surrey. Our private hire coaches regularly journey into London from many locations in Surrey and Hampshire.

1. **How has traffic congestion changed? Are there differences?**
   We have detected a gradual worsening in congestion levels, particularly in inner and central London. Congestion is now a reality all through the day/week, including on Sundays. As a coach operator we have to allow more time for coaches to get into and out of London (typically 2 hours is now required for a trip from the Guildford area to central London or vice versa which puts customers off, makes worthwhile school visits to London destinations impossible during the school day and makes efficiency of operation that much harder, increasing our costs. Drivers get frustrated and we now feel it appropriate to pay them extra for any journeys entering central London.

   Reduced availability of coach parking is a problem which exacerbated congestion by coaches having to 'tour' the capital in search of parking. We strongly advocate that coach parking at New Covent Garden/Nine Elms be allowed until 1600/1630 hours (not the present 1430 hours limit which is too early for most coach trips), that the London Bus Garage parking experiment promoted by our trade organisation CPT be made permanent with prices reduced to £20 for CPT members (currently £30) or a graduated charge according to length of stay/price reduction for shorter stay, also remove the need to pre book). We support the proposal to increase waiting limits on coach bays from 20 to 60 minutes, thereby enabling drivers to get their 45 minute legal rest break at the affected locations.

2. **What are the key causes of these changes in congestion?**
   Traffic growth is the obvious one, combined with reduced road capacity due to the Cycle Superhighway (particularly on the Embankment) and other works (eg Crossrail). Restricted turns mean longer journeys (eg no left turn from Embankment to Westminster Bridge creating the need to travel round Parliament Square, no left turn from Embankment into Horseguards Parade). Restricting junctions with pinch points ('bells' on corners etc) make driving coaches and other large vehicles slower, increasing congestion. The increasing ineffectiveness of the Congestion Charge is a huge problem, while slower bus speeds and less reliability are surely meaning that there is modal shift back to private cars, increasing congestion.

3. **What impact does congestion have on Londoners, the city's economy and its environment.**

The impact is negative in all cases. I have mentioned some of the impacts on our business and our customers in 1 above. The net result is that fewer people travel to London destinations, at least by private hire coach, impacting attractions and other destinations.

4. **What can London learn from other cities?**
   We are unable to comment in detail at this stage.

5. **How effective is the Congestion Charge? How should the scheme be modified?**
   While good to start with the Congestion Charge appears now to be largely ineffective. We consider that there should be no exceptions for reduced pollution vehicles (which still cause congestion, irrespective of how clean they are!) and that the Congestion Charges should be very much higher (minimum £25.00/day for a car, higher for a LGV). A complete ban on private cars should be considered at certain times of the day. We appreciate that buses and coaches are exempt on the grounds that they are an extremely efficient form of people movement and would expect this exemption to continue.

6. **To what extent would a usage-based road pricing system regime help to reduce congestion?**
   Ultimately this is the only solution, and we support it because it introduces the discipline of the market to road usage in exactly the same way as for other commodities including public transport (normally cheaper at quieter times etc). It would restrain traffic (hence congestion) particularly at the busiest times and cause road users to make decisions on when and how to travel accordingly.

7. **How might the (proposed) ULEZ and Emissions Surcharge affect congestion levels?**
   As indicated in 5. above we consider that polices to deal with Congestion and clean up the environment are completely different and must not be confused. The proposed ULEZ would be created to address air quality and would be a very blunt instrument to address the issue of congestion. We believe that, of itself, the proposed ULEZ would not reduce congestion to any great degree while there is a possibility that restricting the supply of coaches combined with the substantial additional investment/running costs of Euro 6 technology could result in more people using less efficient modes (eg private cars), thus actually worsening congestion.

8. **What would be the benefits and drawbacks of tolling, workplace parking levy, devolving vehicle excise to London?**
   We are unable to comment in detail at this stage.

9. **How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially at peak times?**
   The Congestion Charges should be very much higher for these vehicles (minimum £50.00 between 0700-1000 hours and 1600-1900 hours MF and £25.00 at other times. Consideration should be given to an outright ban at certain times/places, forcing deliveries to be made at quieter times (eg evenings). Road pricing could be used to introduce market discipline into delivery van road usage.

10. **To what extent are minicabs the problem?**
    We are unable to comment in detail at this stage.

11. **Contribution of car clubs?**
    We are unable to comment in detail at this stage.

12. **To what extent could greater efficiency in the provision of bus services help reduce congestion?**
    We understand that bus running speeds are currently falling dramatically and that, for the first time in a decade, bus patronage is now also falling. Buses are a very efficient people mover and all initiatives to improve bus speeds and service reliability will result in greater usage, promoting modal shift from the congested Underground and private cars. Together with other initiatives (eg beefed up Congestion Charge) we believe that improving the bus network in terms of speed and reliability would be of great assistance in tackling congestion.

13. **How can TfL further encourage a shift from private car use to public transport or active travel modes?**
    We are unable to comment in detail at this stage, saver to say that the reallocation of road space to create the Cycle Superhighways is having a very adverse impact for all other traffic.

14. **Can new infrastructure help reduce traffic congestion? What new infrastructure is required?**
    We are unable to comment in detail at this stage other than to say that more road space would assist matters provided that the Congestion Charge/tolls/road pricing is used to prevent latent demand using up all the newly created road space.

15. **To what extent is there a risk of new roads encouraging more people to drive? How can this be avoided?**
    As indicated in answer to 15. there is a risk that that latent demand using up all the newly created road space. The Congestion Charge/tolls/road pricing must be used to prevent this happening.

16. **How should new road infrastructure be funded?**
    We are unable to comment in detail at this stage. The Congestion Charge/tolls/road pricing could provide part of the funding stream.

17. **How effective are TfL's measures to limit roadworks?**
    We are unable to comment in detail at this stage.

18. **What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?**
    It has made congestion worse. This is particularly true of the Cycle Superhighway, as indicated in our response to 2. above.

19. **How can the use of technology be enhanced to help TfL manage congestion**
    We are unable to comment in detail at this stage.

20. **How effective has the Road and Transport Enforcement team been in tackling congestion.**
    We are unable to comment in detail at this stage.

I trust that these responses are helpful to your consultation.

Best regards

Andrew Halliday
Managing Director

Investigation into traffic congestion in London

Transport Committee

SENSE WITH ROADS RESPONSE

This document contains the response of SENSE WITH ROADS to the document in which the GLA Transport Committee asks a series of questions about traffic congestion in London.
The SENSE WITH ROADS comments are shown in VIOLET in the text below.
We should welcome an opportunity to give evidence to the Committee.

SENSE WITH ROADS is a group of people based around Croydon, led by Peter Morgan, who writes this paper and also manages the Coulsdon and Purley Road User Forum.

The London Assembly's Transport Committee has launched an investigation into traffic congestion in London, examining what the Mayor and Transport for London can do to reduce congestion.

This paper invites organisations and individuals to submit views and information to the Committee, giving you the opportunity to influence our recommendations. We pose a number of key questions to be answered.

Traffic congestion in London

Following a long period of relative stability, London's roads have been getting busier and more congested for at least the last two years. Average traffic speed has fallen, as has journey time reliability on London's main roads. Excess waiting times for buses has increased.

We broadly agree, but this is simplistic.
"journey time reliability" is a false measure. What matters is "journey time".
It is better to have a journey which normally takes 15-22 mins, but occasionally takes 30, than to have one which nearly always takes 22-25 mins, although the second case is much more reliable.
TfL pays far too much attrition to its false measure, and neglects the simpler one we advocate.

It must be clearly understood that London is not one homogenous whole.
London is made up of a large number of areas with town centre characteristics, with large areas of suburban roads, and only a very few main roads with traffic able to move much above 30mph.
Patterns of road use and traffic use vary considerably across London.
This is a reflection of very varied patterns of need. There are huge differences between typical journeys within central London and those in outer London.
It thus would be quite wrong to propose "solutions" for the whole of London.

Volumes of motor traffic in London have been generally flat for 15 years or more. Within that overall picture, volumes have moved up and down in general line with the economy. There is also a pattern of lower growth and greater falls in central London, with greater increases and smaller falls in outer London. Inner London has characteristics of both of these areas.
This also mirrors patterns of car ownership.

In much of inner London, the commonest number of cars per household is nil, though in most areas the majority of housedogs have at least one car.
In parts of outer London, there are more homes with 3 or more cars than with none.

Congestion problems have been especially bad over the past few years due to utility works and construction projects. A major factor has been huge cycle priority schemes, which have generated very severe congestion – and this is ongoing after they are complete.

High levels of congestion exacerbate a number of serious problems facing London. Longer and more unreliable journey times affect business productivity, harming London 's economy. Air pollution from congested roads has a detrimental impact on Londoners ' health and quality of life. Road safety is also reduced on congested roads for vulnerable users such as cyclists, pedestrians and motorcyclists.

There is no dispute that "congestion" is a negative aspect of road travel.
We challenge the assertion that congested roads are less safe for any group of road users. Safety is much more complicated than that.
We point out that the safest roads are those with the highest average speeds, while the most dangerous are those with slow-moving traffic and lots of pedestrians and cyclists.

The causes of these trends are complex. There have been increases in certain types of vehicle, such as delivery vans and minicabs. Effectively, there are now more vehicles using London's roads, while some of the available capacity has been reallocated to other Mayoral priorities such as cycling, and construction work has constrained space further across the road network.

Traffic data for overall movements as above shows flat or slight falls until a recent slight rise.
Data on numbers of delivery vehicles and mileage run is very limited. There is no evidence that this traffic is making congestion worse – although vehicles parked for a delivery can cause serious congestion and delay.
There is data on the number of licensed minicabs, but not of the mileage operated by them. Minicabs tend to be efficient in their use of the road compared to similar vehicles with ordinate drivers. Minicabs provide an essential service in London, and there is no evidence that they are a significant source of congestion. Black cabs do cause delay, but they also are needed.

We say minicabs should be allowed to use bus lanes.
That would have little if any effect on bus operations, but would allow minicabs to get about much more easily, while also relieving general traffic congestion.
We see no reason to favour those who pay to use a bus over those who pay to use a minicab.

Numbers of buses on the road have increased, with many routes having increases in PVR to cope with traffic delays and also with some increase in demand. TfL focuses on "journey reliability", which means buses running slower, and parking up for longer at trip ends,
Buses are a major contributor to traffic congestion, both directly by their presence on the road, and indirectly from their infrastructure, such as bus stops and bus lanes.
More buses on the road inevitably means more congestion.

We agree that mayoral promotion of cycling has had a severe adverse impact on road capacity, and is a major cause of ongoing serious congestion.

Key questions

In this investigation there are a number of specific questions the Committee is seeking to answer, as set out below. Respondents should address any questions where they have relevant views and information to share, and feel free to cover any other issues they would like the Committee to consider.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

As noted above, congestion varies enormously across London.
In terms of road mileage, most roads are not congested at any time for almost their entire length.
Congestion is concentrated at road junctions and pedestrian crossings and on TfL roads and main and secondary roads managed by local councils.
There are very few TfL roads which are not plagued by congestion.
Journey times during the working day (MF 1000-1600), and weekdays 1000-1700 are typically 50% higher than in free-flow conditions between 0100 and 0400.
In the peaks (0700-1000 and 1600-1900) and on some sections during the day, the time may be double or even worse.

Central London has been particularly badly damaged by constant road works.
Elsewhere, congestion has generally increased, while traffic volumes have changed little.

The appalling delays experienced at busy times have led to the evenings getting busier, with many roads very busy until 2000 or later, with traffic not really falling off until after 2300.

We would stress how serious and adverse has been the impact of cycle highway works.
For example, a trip from Blackfriars to Elephant that would have and should take about 3 minutes was taking 20 minutes due to these and other works. On a Sunday afternoon, instead of The Embankment being free-flowing, we were stuck in stop-start traffic for about 10 minutes from Trafalgar Square to Blackfriars.

The creation of the GLA and TfL led to a noticeable worsening in congestion relative to traffic volume. **Political interference has been very damaging to the road network.**

It is noticeable how often **a new TfL layout results in dreadful congestion** while it is built. More seriously, when completed, congestion is very much worse than before.
Examples include Tulse Hill, Brixton and Stockwell.

2. What are the key causes of these changes in congestion?

Transpire for London and local councils in London.

Traffic and the road network have been very badly managed for decades, and much worse over the past 15 years, and this is the primary cause of increased congestion.

Beyond direct observation, this general conclusion follows inevitably from the fact that congestion has got worse and worse, despite traffic volume remaining broadly uncharged.

On main roads, schemes have so often removed traffic capacity, notably with traffic signals replacing roundabouts and priority junctions.
From 2000-2008, there was a huge expansion of bus lanes. Many were implemented with a very superficial analysis, and there has been no review of almost any of them.
Complaints that a specific bus lane is doing more harms than good are dismissed with weak and trivial analyse. Getting even a trial suspension to test the effect is almost impossible.

TfL has encouraged local councils to obstruct traffic movement on council roads. Money has been offered for endless “traffic calming” schemes, while there is no funding for improving traffic flow or capacity.

Councils have actively changed side roads to force traffic onto main roads. This has meant much more severe congestion. Good examples may be found in the New Cross area,
Road closures force traffic to go on long diversions, and making travel on side roads very slow makes use of main roads more attractive, but the main roads themselves are often badly congested, and the network is badly damaged by a small amount of extra traffic. Consider having to turn right out onto and then right off a main road simply to avoid a closure, three times the distance, and holding up main road traffic.
20mph schemes are a notable negative. On far too many roads in London now, there are needless 20mph limits. This increases journey times, and worsens pollution.
Many Councils, including TfL, say slower speed is an advantage, but this can only mean slower journeys. Slower speeds mean roads are busier, with more vehicles per mile, and more congestion. One car per minute on a mile of road means 1 car at 60mph, 2 at 30 and 3 at 20.
It has always seemed anomalous to put the slowest vehicles – bicycles – at the front of the queue (advance cycle stop line), so they then get in the way of faster vehicles, including buses.

Poorly designed traffic signals, with poor signal timings are a major source of traffic congestion.
TfL are very reluctant to make changes, even when well argued.
Many signals could simply be switched off, and roundabouts would often work better, notably at the northern end of the Coulsdon Bypass.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Congestion by definition is a negative aspect of travel. Serious congestion and delay are inevitable on roads and on buses, for example near a football stadium before and after a match.
Congestion is a blight on the lives of everyone impacted by it, and it damages the economy and the environment.
When it takes 50% or 100% longer to get around at working times, delivery vehicles can only do 2/3 or half the work in a period of time.
Slower journeys means pollution is being pumped out for longer per journey.
Motor vehicles are less efficient at low speeds, so pollution per unit time is generally worse.
The key objective should be to minimise unnecessary congestion, and to design changes to the road network that will reduce it.

4. What can London learn from other cities in its effort to reduce congestion?

London is different from many other world cities.
London covers a large land area, with lots of small centres and a poor road network.
There are few dual carriageways, or roads with speed limits above 30mph.
Other cities in the developed world tend to be smaller and more open. They may have a small, congested centre, but further out there are good roads – see Paris http://bit.ly/2cX0uXx
In the less developed countries, cities often have much worse congestion than in London. For example, in Kampala in Uganda, a journey that takes 15-20 minutes at quiet times may often take 45-90 minutes at busy times, such as 1600-2100.

See Qu 14 for specific examples of how other cities manage traffic so much better than London.

In addition to these general issues, the Committee has identified a number of different approaches to tackling congestion, most of which are already being used by TfL to some extent. We have posed a number of questions in relation to these different approaches and interventions.
The six approaches outlined below are not necessarily mutually exclusive and could all be used to reduce congestion in London. The Committee will seek to recommend the most effective measures, ensuring an appropriate balance between the competing priorities Londoners have for their road network.

Charging for road usage

TfL already operates the Congestion Charge scheme in central London, and pollution-based charges are in operation or will be introduced.
TfL operates the Low Emission Zone, with an Ultra Low Emission Zone and Emissions Surcharge also proposed.

Tolling of specific roads such as river crossings has been proposed. The Mayor also has the power to introduce a Workplace Parking Levy.

5. How effective is the Congestion Charge? How should this scheme be modified?

The Central London road toll, misnamed as the Congestion Charge is a huge negative for London. This tax on travel is a very blunt and crude charge.
There is no connection between the amount charged and who pays it, nor with the amount of congestion caused.
For example, buses cause a lot of congestion, as do cyclists, but they are not charged. Many short trips by car into the Zone would have negligible impact on congestion, but they are charged the full amount. Once paid for the day, causing congestion is free.
It is scandalously wasteful tax, with around half the revenue going on managing the scheme.
It caused a step change reduction in numbers of vehicles *entering* the tolled zone - around 20%.
However data on the volume of traffic *moving within* the Zone is scarce.

The mayoral / TfL claim was that those paying for the "service" would benefit from faster journeys. The reality is journeys are slower than ever. Buses are slower now than before the scheme, despite less traffic on the roads.

One negative impact of the Toll is that by diverting travellers onto buses, bikes and foot, congestion and delay has been made worse.
By definition, journeys are worse for those forced by the toll to change mode of travel. However more bus passengers often make journeys worse (more congested and slower) for existing users, while more pedestrians means more time for others sitting at red lights.

We note that when the Western Extension was scrapped, there were no stories of traffic congestion becoming worse. We believe that there has been no noticeable impact on congestion. Meanwhile, business has thrived with the yoke of the tax removed.

Many businesses in the Zone have their earnings depressed by lack of car-borne shoppers, while they are burdened with the extra costs of the tax on deliveries.

We recommend an immediate consultation on a trial scrapping of the scheme.

Paying particular attention to the views of residents and businesses in the Zone, but also taking account of the view of others who respond, there should be a commitment to suspend the scheme for 6 months if this is supported by the community.
Assess the effects, and if as we anticipate they are overall favourable, then make the suspension permanent.

If there is concern about loss of revenue, then a small increases in GLA precept would cover this.
That would be a very efficient tax, with almost no extra administrative cost, and we advocate that as the way forward.

6. To what extent would a usage-based road pricing regime help reduce congestion?

For instance this may entail charging vehicles by distance driven, rather than charging for entry to a specific geographical area.

As noted above, the objective should be to make the road network operate better. Imposing new taxes on travellers to deter some from travelling is not a sensible approach to cutting congestion.

There is no conceivable usage-based road-charging scheme that would be acceptable for any part of London.

There is no way to relate charges to need to travel, nor to ability to pay.
There is no way to relate charges to congestion caused, or to congestion points.

Any scheme would be very costly to manage, and would be very unfair.

Clearly savage charges would deter some people from travelling – to whose benefit? - but many would have no choice, and would simply cut out luxuries in order to pay the new taxes.

We would resolutely oppose any proposals for any "usage-based road pricing regime".
We would prefer to endure congestion than suffer this kind of new tax.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

TfL operates the Low Emission Zone, with an Ultra Low Emission Zone and Emissions Surcharge also proposed.

TfL says they want people to switch to compliant vehicles, rather than pay the new taxes.
That means imposing huge costs on many drivers, and severely disrupting the used car and van market, but people will simply have to pay up and buy newer vehicles.

These proposed taxes on some vehicles are unlikely to have any impact on congestion.
Newer cars and vans are generally larger - wider and longer and higher – than older ones.
There has been no recognition of the need to widen roads to provide for the wider vehicles now demanded by EU regulations on vehicle safety.
The newer vehicles will on average be bigger, taking more road space, mailing congestion worse. **This effect will be a general big negative of the policy.**

There will also be a switch, where those with a choice use non-taxed vehicles in the taxed zones. For example, buy a second or third car, and use the compliant one when travelling in the emission-tolled area, and the other one when going elsewhere.

8. What would be the benefits and drawbacks of these other interventions?
- **Tolling for river crossings or other major infrastructure**

We are resolutely opposed to tolling of any road.
Roads are used by all, and all benefit from them. Roads should be paid for out of general taxation, with no specific usage-based charges.
We would point out that there is already one severe usage-based charge, fuel duty and VAT, so the more miles you go, the more tax you pay, and also the more time wasted in congestion the more fuel you waste, so the more tax you pay.
Tolling of river crossings simply harms cross-river business, and encourages extra travel to avoid the tolled crossing.

- **Workplace Parking Levy**

The Mayor should reject any temptation to introduce any taxation of parking spaces.
London needs to be a place to do business, not a pace to get away from.
Business is already lost to London due to its bad road network, and any WPL would be just another reason to move away.

- **Devolving Vehicle Excise Duty to London**

This has nothing to with congestion – unless the mayor wants to misuse any such power.

The government should flatly reject any suggestion of allowing a here-today gone-tomorrow mayor to meddle with rates of VED. NO NEW TAX POWERS FOR MAYOR OF LONDON.

The Mayor should stick to government grants, the GLA precept, and charges for public transport to raise revenue – and we note reduced subsidy for public transport is really the issue there.

Measures to target specific types of vehicle

Heavy road users – like commercial delivery vehicles, minicabs or private cars – could be targeted with specific measures. There could also be efforts to reduce bus traffic.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

This would be a false objective.
TfL has no business trying to do this.
Delivery vehicles provide an essential service, and are vital to London's economy and to people and businesses in London.

There is no practical way of reducing deliveries in congested areas or at peak times.
Most deliveries are after 0900, and delivery companies try to avoid peak times and congested areas because they are so slow.
Delivery companies already manage their work to minimise time wasted in traffic jams, and TfL has no competence to assist them.

The one big thing to do is SCRAP THE LONDON LORRY BAN.
It is utter madness to ban lorries from travelling and delivering at night and at weekends, when traffic levels are much lower, and the ban makes congestion needlessly bad.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

There is no evidence that any increase in minicabs is making traffic congestion worse.
Unlike, buses, minicabs do not of themselves make congestion worse.
Minicabs are a small proportion of traffic, and are adept at cutting through it. After all, their business relies on getting people to their destination quickly and safely, not getting stuck in jams. More minicabs might encourage a switch from car to minicab, which might benefit traffic.

We oppose TfL's suggestion of restricting the number of minicab licensed, and we also object to TfL's increased regulation of minicabs.
TfL is putting up the cost of minicabs, and the best way forward is a free and open market, with TfL keeping any regulation to an absolute minimum.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

The ideas of a car club is that anyone can get a car to use any time they wish without having to go through all the burdens of individual ownership.
The idea is there are fewer cars in total parked somewhere, but individual cars do more miles, being in use more often.
The big flaw with car clubs is that they simply do not work for most people.
If there are a group of people who want to use a car at different times, then it may be possible to book a travel time, but this is a very rare occurrence.

In our view, car clubs are a con, motivated by those who want to discourage people from driving.

In any event, there is no reason why a car club should reduce congestion.
Car clubs often require dedicated parking spaces, which makes for less efficient use of parking road space.
Very few people would find a club car a credible alternative to their own car, but a few might find they could afford a car share. Thus car clubs could actually increases the number of trips made by car.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

As noted above, buses are a serious source of traffic congestion.
Successive mayors have phased out Routemaster buses, but they were so much better in terms of congestion.

Film below shows how well Oxford Street worked when nearly all buses were Routemasters.
Using OMO buses has meant huge delays to all, despite general traffic being banned.
http://bit.ly/2cTKv9H
http://bit.ly/2cHltfc

We note the new Routemaster was supposed to reintroduce the hop-on hop-off feature, but the new mayor has now scrapped this.
Hop-on hop-off was very convenient to for the passenger - allowing one to get on or off when a bus is stuck at traffic lights or elsewhere, meaning much better journeys, with interchange between buses much easier.
It was also a big benefit to bus operations, as it means less time spent at bus stops – sometimes a stop was no longer needed.
This also really benefited general traffic, with queues caused by buses at bus stops reduced.

If TfL cut bus subsidies, and made bus uses pay more of the cost of their travel, then people would think whether it was worth stopping the bus to make a trip of a few hundred yards.

TfL should make better use of bus patronage data to better match service provision to demand.
While buses are inefficient when full or nearly full, there is no justification for operating high frequency bus services with just a handful of passengers.
We sympathise with those waiting for a bus, but we question running buses every 10 minutes when they carry less than 10 passengers.

TfL also needs to recognise that every change of buses wastes time for the traveller. It also means more people getting on and off the buses.
It also means more general congestion and delay with more and longer stops.

Thus **we advocate running longer bus routes**, so passengers can make many longer trips, though not necessarily the whole length of the bus route.
This would be a reversal of current TfL policy, which is for shorter routes and more changes.

A bus that starts full and runs with everyone on board for 30 mins causes very little congestion.
A bus that runs full throughout, but changes 5% of its load at every stop causes a lot of congestion – even if the bus stops are set into laybys.

TfL should seek to install more bus stop laybys, so buses can do their business while the other traffic goes past, not keep everyone waiting, and then lead a long queue of badly delayed traffic.

Encouraging modal shift

Greater use of more sustainable transport modes, particularly public transport, walking and cycling, would help address congestion.

This is a generalisation, which as stated is FALSE.
Sustainability is a separate issue from congestion.
TfL should explicitly recognise the many big benefits from car use, notably from car commuting.

If a traveller switches from car to bus, their journey typically takes twice as long with one direct bus, and 3 times longer or worse otherwise.
The impact of one car on congestion is negligible, however the switcher often loses out badly.

Some buses and many trains are already congested.
More users means more congestion.

Given the very high levels of congestion on LUL and NR services, how can TfL expect people, to switch to train? What about the impact on congested trains and platforms?

Switching from car to walk is simply not possible for almost any journey.

Switching from car to bike may be possible for a few, mostly young men, however as accident data shows, it leads to more death and injury.
For a trip that is short, on fairly straight and level roads, when it is dry, not too cold or too hot, and when you have time and facilities to change clothing after cycling at each end, a bike may seem attractive to a few.

For almost everyone for almost every journey, the bike is simply rejected if even considered.

More bikes on the road would make traffic congestion much worse.
Just one bike can cause real delay to a large number of cars struggling to get past safely.
A shoal of cyclists is a major impediment to motor vehicles, and generates significant congestion.

Cycle congestion, where a lot of cars and some buses and lorries are badly delayed by a few cyclists may be seen on the B2032 Chipstead Valley Road.

More people walking means more pushing of pelican crossing buttons, more red lights, more stopping at zebra crossings, longer waits for pedestrians to pass.
Thus more people walking means more traffic congestion.

Some claim the problem of the school run is “all those extra cars”.
We suggest it is more all those extra children walking across the road, waiting for buses, buses blacking traffic.

There are specific examples of this, for example at the zebra crossing on the A23 Brighton Road at Stoats Nest Road.

At either end of the A237 Lion Green Road in Coulsdon, there is a pedestrian phase at the traffic signals, and at Marlpit Lane a short way to the south. These pedestrian phases are currently called about 40% of the time at busy periods, and this causes serious congestion. Any big percentage increase in pedestrians crossing would make congestion much worse, even if the actual numbers were small. About half of pedestrians push the button, and typicality only one crosses each time it is pushed – and often they do not wait for the green man. Doubling the flow from 1 a minute to 2 a minute might cost hundreds of drivers a couple of minutes each – maybe more. This shows how a small switch to walk could have big negative effects.

The one way that a shift away from car travel could reduce overall congestion is that it would simply mean less travel.
Because of the huge waste of time involved in going by bus or train for so many trips, they would simply not be makeable at all if one rejects the car.
Travel is a virtuous activity – be it for work, commuting or social purposes.
Congestion is a necessary and inevitable consequence of travel.
The aim should be to reduce congestion while facilitating travel, not seek to reduce congestion by frustrating travel.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

TfL should NOT seek to encourage any such shift.

TfL should provide neutral unbiased information on travel choices, and avoid any prejudice for or against any mode.

TfL should be particularly careful NOT to suggest that cycling is either safe or healthy.
Safety data shows that cycling is about 15 times as risky as car travel.
However the true risk is much higher, as many cycling accidents are not reportable or recorded.

Cycling is an inherently dangerous activity, and there is no way to ever make it as safe as car travel. TfL should make this fact clear to the public.

Providing new road infrastructure

There are proposals for new road infrastructure in London, including river crossings and tunnels, which TfL has considered or is now actively pursuing. These include, for instance, the Silvertown Tunnel across the Thames in east London, and a tunnel from A40 at Park Royal to the A12 at Hackney Wick.

New river crossings in east London would bring big benefits.
Apart from promoting business and the economy, they could also reduce congestion.
Key would be making them proper roads with 2 or 3 lanes in each direction open to all traffic. Where there is demand, footways and cycleways separate or shared use should be provided in addition.

The tunnel from the A40 to the A12 would be enormously expensive.
It would only make sense if there were many junctions along its length.

However a new road, with sections in tunnel, linking the M1 at Staples Corner through West London at White City, past Wandsworth and down to Streatham would be of huge benefit, as would an alternative to the A23 between Streatham and Purley Way.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

This is surely obvious.

The Coulsdon Bypass on the A23 opened at the end of 2006.
This one mile stretch of wholly new road has produced a big and lasting improvement in travel time, and a big reduction in congestion along its length and along the sexton bypassed.
Sadly political interference led to it having only a single lane southbound, and a superfluous bus lane northbound. Despite no bus route ever being scheduled to use the bypass, the bus lane is still there, and it causes significant needless congestion and delay, principally by cutting the effective capacity at the northern end of the Bypass.
The speed limit was recently raised from 30 to 40mph. This has led to less congestion, faster journeys, much improved speed limit compliance, and no adverse safety impact.

Road building policy in London went wrong in the 1960's. Roads were proposed then and in the 1980's, but they were not properly designed and promoted, so generating much opposition.

London lags badly behind the rest of the UK, and also behind most of Europe, while we are far behind America and the Middle East.

We have long argued that London is falling behind countries all over the world, not just Europe, the US and the Middle East, with the way we are so anti-road here.

Good public transport is desirable, but the focus of almost all investment there simply leaves us lagging badly while others steam ahead.

Here are some examples of what we mean.
It may horrify the Green freaks, but it surely inspires many.

http://bit.ly/1MnOms8

http://bit.ly/2d3Tw3y

http://bit.ly/2cA4DOj

http://bit.ly/2cTQc7x

http://bit.ly/1G5f6MJ

We are not proposing a huge road building programme in London.

We do propose that some major road improvements should be built.

One example is along the A23 from the M23 to Purley Way.
Hooley, just outside London, needs a bypass. There is an obvious way to the east.

From the GLA boundary to the Coulsdon Bypass, the A23 needs 2 lanes each way, with a road bridge at Woodplace Lane. There is space readily available.

From Purley to Old Lodge Lane, the A23 should be 2 lanes each way. That only requires modest land acquisition at one pinch point.

There are numerous other places where main roads need capacity improvement.

The trouble is TfL thinks negatively.
For example, TfL claim it would, be better if traffic moved more slowly along the A23 between Purley and Coulsdon – even though between Purley Cross and the start of the Bypass takes between 3 and 4 minutes normally, and up to 6 minutes at peaks, when free flow traffic takes 2m30.

TfL current policy on pedestrian crossings on main roads needs a reversal.
Pedestrians are safest crossing the road by subway or bridge, and this grade separation reduces congestion. Well-designed subways afford quick and safe crossing of roads, and TfL should promote the provision of these.
The fact that some old pedestrian bridges involve long extra walks is a reason to design them better, not to promote at-surface crossings.
The Tesco subway at Purley Cross is a good example of a safe well-designed subway, that lets pedestrians cross the road much more easily than any surface crossing could, while keeping traffic moving. In central Croydon, TfL has agreed to a council scheme that involves removing subways - which will make congestion and delay for both pedestrians and vehicles much worse.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

There is nothing wrong in principle wish more people travelling by car.
Life is about doing things, and making an extra trip is in principle a positive thing to do.
The trick is to manage the road network so that as far as possible those who wish to travel can do so without undue congestion and delays.

It would be better to have more traffic if we had less congestion.
Achieving this paradox is not difficult with an imaginative approach that recognises the true efficiencies of various travel modes and choices.

Before the Coulsdon Bypass opened, there were regular long queues all day every day to and through the town. With the Bypass these have gone – though other big congestion issues remain. It is very possible (data is inconsistent) that there is more traffic using the A23 past Coulsdon now the Bypass is open, but so what? Apart from an issue over the location of traffic counters there, any increase in traffic on the A23 may be due to diversion from other routes, rather than extra new or longer journeys. It may be more people travelling.
This may be an example of where more traffic can flow with less congestion.

In summary, one small road improvement may have some local impact on traffic volume, but bring big gains in reduced congestion locally, without making it worse elsewhere.

A network with much more capacity, or one with much less congestion, could lead to more traffic, but if this is achieved with less congestion, then people, business and society all benefit

16. How should new road infrastructure be funded?

As stated above, all road infrastructure should be funded through general taxation.

Businesses might agree to contribute to schemes that realty delivered better roads for their purposes.

Private motor vehicle users, cars, vans, lorries already pay far more in road taxes than they get back in road expenditure.
Meanwhile cyclists pay nothing, and buses get big subsidies.
If cyclists want lots more money spent on road facilities for them, then a way needs to be found to make them pay towards this.

Maximising available road space

Space on London 's roads is often restricted by construction work or other roadworks. TfL uses measures such as a lane rental scheme to manage this. In some cases, road space is diverted permanently for other key priorities such as cycling infrastructure or improved pedestrian space.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

TfL is very bad at managing the timing of road works.
TfL repeatedly permits planned road works on the A23 between Coulsdon and Purley on Mon-Fri daytime. This has repeatedly caused very severe congestion, with queues of up to a mile, and delays to buses of 20 minutes or more, and sometimes even 40 minutes. This leads to severe disruption to bus services across a wide area.
Complaints have not led to such works being restricted to after 2100 Mon-Fri and after 1900 at weekends, finishing by 0600 Mon-Fri and 0830 at weekends.

We support pre-planned works on the highway requiring a permit from TfL or the local council.
Charges should be kept minimal – they are either paid by utilities and passed on, or by private businesses or individuals - and the works are normally unavoidable.
The key is to ensure times of working are set to minimise adverse effects. Thus there might be no charge for works restocked to 0000-0600, with charges varying according to time of day. The charge would relate to the time the road is obstructed, not the time work is undertaken.
More use should be made of metal sheets to cover works, so traffic can flow past at busy times.

What incentive is there to get road works finished as soon as possible once any fee is paid?

Too often, temporary traffic signals operate very badly.
TfL and councils should require a proper plan which sets out how the needs of passing traffic have been assessed, and how green times will be set to minimise delay.

Advance warning signage and diversion signage are both far too often wholly inadequate. Signs appear too late, do not give adequate information, and are not placed in all the right locations.
Diversion routes are often fanciful, with signage not understood or simply ignored.
For pre-planned works, two weeks advance notices should be given by on-road signs.

Large amounts of congestion and delay, and needless wasted time are caused by bad management and signing of road works.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

As noted above, **taking away much needed road space for motor vehicles has made congestion and delay much worse in so many locations.**
TfL's advance analysis is shown to be defective in practice, but there seems to be no review.

Traffic engineers do not understand aspects of driver behaviour.
For example, bus lane theory does not match practice, so bus lanes in practice do much more harm than theory predicts.

Traffic engineers do not want to review their schemes – lest their mistakes be exposed.

The big problem with some of these "additional space provided for cycling and pedestrian" schemes, is that they are not based on user demand, but on promotion.

Thus Coulsdon had £4M spent on fancy wide pavements that are still, 7 years later not wanted or needed, while drivers can't find the convenient parking spaces they need.
Having to drive op and back looking to for a parking space means wasted time and fuel, but also making congestion and delay worse.
Why does TfL not promote more parking spaces where that is the need and demand?

Congestion and delay may be visible or insatiable. A queue of cars at traffic lights is obvious, but how about delays getting on or off a bus or train because it is full or nearly full?
Congestion is bad because it causes delay, but modal switch may mean slower journeys overall.

Active traffic management

TfL uses technology to monitor and manage traffic, for instance altering traffic signals to respond to incidents causing congestion. It has also recently introduced a Road and Transport Enforcement team to provide an on-street response.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

TfL has access to vast amounts of data on bus services, so **TfL could use computer technology to analyse where buses are being delayed, and hence where *general* road improvements may be needed.**
This would also show up for example the huge disruption caused by the A23 works mentioned above.

TfL has a huge network of cameras along the Red Routes.
However, rather than using these to manage traffic signals and analyse traffic queues and congestion, causes and solutions, TfL prefers to use them to watch for any chance to impose harsh fines for trivial parking and loading infractions.

We accept that controls on parking and loading are necessary, however too much of this enforcement simply damages busyness, people and the economy. In fact, the Red Route network has far too many restrictions, and these are far too inflexible. The network dates mostly from 20 years ago, and it has proved almost impossible to get any relaxation.
There are numerous places where parking could be allowed but is not. One example is the 0700-1000 stopping ban on the Brighton Road immediately north of Purley Cross. At that time, stopping would not be a problem, but TfL ticks to its one size fits all approach.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

We note above how **TfL's traffic enforcement often makes congestion worse rather than better,** and also imposes needless inefficiency and misery for the road user.

TfL acquired powers to issue **fines for yellow box junction infringements** around 10 years ago. TfL claimed this would be a good way to improve traffic flow and reduce congestion.
We predicted that in fact it would mean a lot of people getting fined, while traffic flow would get worse – as seen at Bagleys' Lane in Hammersmith **http://dailym.ai/2conYCy**
After months of yellow box enforcement, TfL produced a report which to their surprise stated that the effect of this yellow box enforcement had been to make traffic flow worse, not better.

We asked TfL last year for a copy of this report, but TfL claimed they had no record of this study. Is this because TfL has a policy of destroying valuable evidence, or just losing reports that do not suit its political dogma?

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Georgina Wells,
London Assembly,
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The Queen's Walk,
London SE1 2AA

August 2016

RE: Evidence for Investigation into traffic congestion in London

Dear Ms Wells,

I am responding to the above call for evidence. I am a Senior Lecturer, researcher and writer on transport planning and policy; my last book, *Urban Transport Without the Hot Air*,[1] includes a chapter on transport in London. A full list of my publications and past research projects can be found at the URL cited at the end of this letter.

The following responds selectively to those of Committee's questions where I can most usefully comment.

1. **How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?**

The DfT's measures of average speeds and average journey times on locally-controlled A roads in the morning rush hour[2] show that congestion reached a low point in England and in London during 2012, since when it has been worsening. Comparing 2015 with 2012 shows:

Change in Congestion on Local A Roads in the Rush Hour 2012 - 2015

2015 compared to 2012	Change in Average Speed	Change in Average Time
England	-6%	+7%
Inner London	-7%	+8%
Outer London	-8%	+9%

Whilst this single comparison does not show a complete picture, it suggests that the increase in congestion over that time has been a national phenomenon, which may have been slightly more rapid in London.

2. What are the key causes of these changes in congestion?

There are likely to be many causes, which only a complete study could ascertain, but the above comparison suggests that national (or international) factors, such as recovery in the national economy and the fall in fuel prices have been much more important than any local factors within London (which some respondents may be seeking to exaggerate for political reasons). That small difference is probably mainly due to the faster economic recovery in London, compared to England as a whole (the latest available figures confirm that up to 2014[3]).

3. What impact does congestion have on Londoners, the city's economy and its environment?

On the economy, we do not know. Studies that purport to answer this question are all based on theoretical conjecture, even those that use complicated mathematical modelling and make authoritative-sounding conclusions. With such a complex problem it is impossible to prove what causes what in the real world. We may note however that compared to other regions of the UK London has the most congested traffic and the highest GVA per capita by a big margin in both cases. This suggests that the argument that 'congestion strangles the economies of cities' is at best exaggerated and might be the opposite of the truth. Road congestion will have contributed to the agglomeration effects (where industries cluster together) which have helped to make London the richest part of the UK. I have yet to find any research that seeks to investigate that alternative hypothesis; the reason for that is probably political: there are big vested interests on all sides (including those of transport academics) in talking up the damaging economic effects of congestion.

The environmental effects of pollution from vehicles are clearly negative. Pollution is greatest from vehicles that are stationery; to that extent the environmental consequences of congestion are clearly negative. However, that conclusion depends on the alternative scenario to which we are comparing the 'do nothing' situation. If that scenario involves expanding road capacity, there may be a short-term

improvement followed by a longer-term worsening of local air pollution (the effects on global air pollution will be unambiguously worse).

4. What can London learn from other cities in its effort to reduce congestion?

A key conclusion that I come to in *Urban Transport Without the Hot Air* is that:

> "for as long as people are free to own, park and drive cars and politicians are influenced by public opinion, urban congestion will always be with us... Providing there are enough people with enough vehicles wanting to use a road, vehicles will continue to fill it until congestion slows everyone down and some people start looking for alternatives."

Similar conclusions have been reached by others.[4] The main factors driving congestion are the intensity of activities within an area constrained by the available road capacity. Once the intensity of activities exceeds the *potential* capacity of the area, demand is suppressed so that any increases in capacity (unless they are large enough to solve the *entire* problem) will simply release more of that suppressed demand and redistribute but not significantly improve congestion. That is a long-term statement; many factors may cause congestion to fluctuate in the short-term within limits bounded by the long-term factors. Similar comments also apply to measures that attract vehicle drivers to other modes; they can unlock many benefits but will not solve congestion.

Congestion could be significantly reduced, particularly by targeted congestion charging, as discussed below, but it would it would be politically very difficult to implement – and sustain through future electoral cycles.

Many other cities have significantly improved their urban environment; they have achieved modal shift away from transport by car and towards public transport and active travel. London has been a good example of the former but has only just begun to do the latter. A European project in which I was involved, called EVIDENCE, provides what is probably the most comprehensive online database[5] of what has been tried, what works and what we know and don't know about causes and effects.

There is very little evidence about the long-term effects of any of these measures on congestion. My observations suggest that even the world-leading cities suffer from traffic congestion at peak times. It is not a problem that anyone has "solved".

5. How effective is the Congestion Charge? How should this scheme be modified?

The Congestion Charge has had many positive impacts but reducing congestion is not one of them. The conventional explanation for this is that the potential gains have been eroded by reductions in road capacity to help walking and cycling.[6] There is some truth in this but it would be wrong to conclude that if such reductions had not been made that congestion would now be lower within the zone. We do not know that. Behaviour adapts to new situations differently in the long-term than it does in the short-term. In an area such as central London, where demand for travel by motor vehicle has been very heavily suppressed, more road capacity might well be entirely taken up by more traffic in a relatively short time period (a recent example of this has been the immediate 10-13% increase in traffic which followed the increase in capacity of sections of the M25[7]).

One of the reasons for the limited impact of the Congestion Charge is its flat-rate charging structure. Once you have paid for the day, there is no financial disincentive, and there is possibly a psychological incentive, to drive more. An appropriately-constructed Congestion Charge could have a much bigger impact on congestion, as described below.

6. To what extent would a usage-based road pricing regime help reduce congestion?

An appropriately-designed road pricing system could entirely solve the problem of congestion. The question is not whether it would work but whether it would be accepted by enough of the public to sustain it across electoral cycles. To illustrate the general point, consider a system with payments that varied between zero on uncongested roads and £1,000 per hour on the most congested roads. A pricing system which penalised peak users could maintain free-flowing traffic on those roads if:

- The system was flexible enough to react to changing patterns of congestion, and:
- The prices stretched high enough

Evidence from the railways and the existing Congestion Charge suggest that the prices would have to go very high indeed in order to reduce peak-time travel sufficiently. It is impossible to say how high they would have to rise until trying it (evidence from hypothetical stated preference experiments should be treated with caution). The long-term impacts are likely to differ from the short-term impacts; the railways and the existing Congestion Charge suggest that prices would need to rise faster than inflation in order to maintain the same dissuasive effect.

A more modest pricing scheme could have a modest impact on congestion. Again ‘how much of an impact?’ could only be established through a trial.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

They would have a minimal impact in the longer-term; their main longer-term impact will be to accelerate the replacement of older vehicles.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Following the logic above, the main impact of the growth of minicabs will be to displace other forms of traffic rather than worsen congestion.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Car clubs are an important part of an integrated transport strategy for a congested city. They are particularly useful in areas where the density of housing must be increased without increasing parking. We have recently written a report with Carplus, which describes the process and potential of car club vehicles in new developments.[8] Increasing car club provision will not significantly change levels of congestion, however.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

There may be localised benefits from rationalising concentrations of buses at certain bottleneck places but in general changes to bus services will not have any major impact on congestion for the reasons discussed above.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

There are many ways to do this. As the density of London's population continues to grow, the main aim of transport policy should be to enable people to continue moving around by sustainable modes. The book and the website mentioned above describe many examples of how this has been done in British and European cities. A few key points include:

- Constraints on car/van use are more effective than improvements to alternative modes; those improvements are more important for 'customer service' reasons, than for behaviour change reasons.
- Pedestrianisation and filtered permeability (separating sustainable modes from general traffic in order to give the latter a short-cut advantage) are

methods that constrain motor traffic and improve the urban environment. The Mini-Hollands are an example of area-wide filtered permeability (unfortunately presented as a cycling measure, which limited public perceptions of their wider benefits).

- Reducing the availability of parking is probably the most effective means of achieving modal shift, providing the levels are set low enough and controls are effectively enforced.
- London has a growing quantity of 'car-free housing' but has never tried European-style 'carfree development',[9] another idea that combines modal shift with big improvements in the areas where people live.
- Segregated cycle routes, like the Cycling Superhighways, can have a big impact if they provide a joined-up network that takes many people to places they want to go. The process of extending and joining-up those routes should be viewed as a long-term priority. Note that much of the modal shift may come from public transport rather than private cars (unless they are separately constrained). This may be just as important in areas where the tube is reaching capacity or buses are contributing to air pollution problems.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

No; in a city where demand substantially exceeds the available capacity increasing road capacity in some places will simply make congestion worse elsewhere. The only new road infrastructure that can be justified in a city such as London is to enable access to new developments or to facilitate pedestrianisation or road closures elsewhere (although they can achieve greater modal shift where no alternative is provided).

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Where demand substantially exceeds the available capacity, any additional capacity will fill up with additional traffic[10] very rapidly. The M25 provides one example of that. The most cost-effective way of avoiding that problem is: **don't build new roads!** If London's leaders are determined to spend more public money in that way, then a usage-based road pricing scheme, as described above, could limit some of the damage.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

This is impossible to answer with any certainty but the evidence above suggests that the broader impacts of these changes have been small. In the longer-term

behaviour adapts, so whatever changes are made (apart from a usage-based congestion charge) will make very little difference to congestion in the longer-term.

London should continue to provide more space for cycling and walking road capacity cannot be expanded sufficiently to match rising population. They are also essential to improving the quality of the urban environment. That is an achievable objective, whereas the political price of "solving congestion" may be too high to make it feasible.

Yours faithfully/sincerely,

Steve Melia
Senior Lecturer, Transport and Planning
http://people.uwe.ac.uk/Pages/person.aspx?accountname=campus%5Csj-melia

[1] Melia, S. (2015) Urban Transport Without the Hot Air, Volume 1: Sustainable Solutions for UK cities. (1) Cambridge: UIT Cambridge.
[2] DfT (2016) Flow Weighted Vehicle Speeds. Tables CGN0206a and CGN0206b. The table above compares the unweighted sums of the (weighted) monthly totals for each year
[3] ONS (2016) Regional Gross Value Added (Income Approach) Table 2: Gross Value Added (Income Approach) per head of population at current basic prices
[4] See for example: Downs, A. (2004) Why Traffic Congestion is Here to Stay.... and Will Get Worse. Access. 25 (Fall), pp. 19-25. http://www.uctc.net
[5] See http://evidence-project.eu/
[6] Buckingham, C.; Doherty, A. R.; Hawkett, D. C. L.; Vitouladiti, S. (2010) Central London congestion charging: understanding its impacts. Proceedings of the ICE - Transport, Volume 163, Issue 2, 01 June 2010 , pages 73 –83
[7] Local Transport Today (2016) Surprise as traffic jumps 10% in year on M25 all-lane running. February 5th.
[8] Melia, S. and Parkhurst, G. and Carplus Trust (2016) Car clubs in new developments. Project Report. Carplus, Leeds. Available from: http://eprints.uwe.ac.uk/28762
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Traffic Congestion in London

Sustrans response to the Transport Committee call for evidence

September 2016

Preamble

Sustrans is a leading UK charity enabling people to travel by foot, bike or public transport for more of the journeys we make every day. We work with families, communities, policy-makers and partner organisations so that people are able to choose healthier, cleaner and cheaper journeys, with better places and spaces to move through and live in.

Our vision is a world in which people choose to travel in ways that benefit their health and the environment. Sustrans has over 4,000 supporters in London and works in partnership with Transport for London (TfL), the London boroughs and other private and public sector organisations to realise our vision. Sustrans' London Director, German Dector-Vega, sat on the previous Mayor's Roads Task Force and the Mayor's Road Safety Steering Group.

We welcome the London Assembly Transport Committee's investigation into traffic congestion. We would be happy to give evidence in front of the committee.

Recommendations

On consideration of the evidence presented in this paper, Sustrans makes the following recommendations for consideration by the Transport committee, that:

- Priority is given to a charging system that is linked to road usage, and that
    - Modifications to the exiting congestion charging scheme are explored, identifying potential impact on congestion and traffic in central London;
    - Consideration is given to a workplace parking levy scheme across greater London with revenue reinvested in resources to support business travel planning and active, sustainable transport;
- Priority is given to continued investment in public transport, walking and cycling, to provide non-car options for transport and make more efficient use of road space for moving people and goods;
- Priority is given to exploring the potential of a dedicated team within TfL to reduce traffic, particularly light and heavy goods vehicles, while encouraging collaboration and innovation to manage demand in key sectors.

Summary

For London to continue to thrive as a prosperous, healthy city, with greater opportunity for all Londoners, Sustrans believes that more needs to be done to shift everyday trips to foot, bike and public transport. Congestion must be viewed in light of what we want from our city, our environment, our health and our streets. This is achieved through the efficient allocation of street space to these modes, while taking measures to manage demand for road space that include road pricing.

London has thrived for decades because of the constraints on road capacity

These constraints meant that investment had to be made in alternatives. We have pioneered with underground railways, with the original congestion charge, with contactless tickets for public transport, and now with major investment to redress the balance on our streets and roads to provide space for cycling and walking. No other major global city has achieved such a significant shift away from private transport. But there is still much more to do to move people and goods more efficiently, while improve health, air quality and affordability.

New road capacity does not provide a solution

The effect of 'induced traffic' simply means that congestion very quickly returns to normal levels after road capacity is increased. With more traffic on a new stretch of road, congestion worsens at the next pinch-point.

The central London congestion charge has been vital to recent progress

It freed up road-space to reallocate for more efficient modes of travel; more bus lanes, cycle lanes and better pedestrian crossings. It further incentivises behaviour change to more sustainable and efficient transport. But that was over 13 years ago and its time we look at a more comprehensive solution for London.

There are very successful and diverse examples of charging for road-use and congestion from around the world, with particularly interesting cases in Singapore, Stockholm and Florence. The only cities to manage congestion successfully do so through pricing and the provision of more efficient options for transport.

Key measures to tackle congestion

Sustrans believes there are three specific areas of focus for the Mayor and TfL to reduce congestion in London:

1. Full feasibility into the introduction of an extended, usage-based road charging scheme for London, covering as much of Greater London as feasible and that considers the potential complementary role of a Workplace Parking Levy and potential near-term modifications to the existing central London congestion charge scheme.

2. Continued investment in sustainable, non-car alternatives for transport and the reallocation of road space to walking, cycling and public transport, without which congestion would be much worse.

3. Establishing a team in TfL to improve the efficiency of vans, light goods vehicles and heavy goods vehicle use; while reducing the impact of development, utilities and construction works on traffic.

General Questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

1.1. TfL evidence will demonstrate in detail how congestion has changed. What is clear is that average speeds have reduced slightly, average delays have increased slightly and bus delays have increased slightly.[1]

2. What are the key causes of these changes in congestion?

2.1. TfL evidence suggests that despite a long term trend in traffic reduction, traffic has increased slightly since 2013. Once a road is near capacity a slight change in conditions can have a major effect on congestion and this slight increase is cause for concern.[2] There are a number of factors at play, including an increase in light and heavy goods vehicles, particularly in central London; lower vehicle running costs and changes in the private hire trades.

3. What impact does congestion have on Londoners, the city's economy and its environment?

3.1. Congestion is an indication of the inefficiency of road traffic for transport in a city. It exacerbates many of the negative impacts of traffic, particularly on public health and the environment, including air pollutant and greenhouse gas emissions.

4. What can London learn from other cities in its effort to reduce congestion?

4.1. Many other cities recognise the need to manage demand to tackle congestion. Those with generally more equitable, healthy and efficient transport systems manage demand through pricing and the provision of sustainable alternatives.

4.2. The Roads Task force states that, "In successful cities, there is a clear trend towards reducing the impact of motor traffic to improve the quality of life and make them more attractive to live in and to do business. Exciting new spaces for city life have been created, and they have delivered high-quality cycling networks and made cities great for walking."[3]

4.3. A number of cities have successfully reduced traffic volumes and congestion through a package of measures that have included charging schemes alongside major investment in public transport, walking and cycling, such as Milan, Stockholm, Singapore, Florence, San Diego and Nottingham. Each offer slight variations on similar themes – to charge drivers for their road use, parking space or relative to the pollution their vehicles produce. Many of these then channel revenue generated back into public transport, for example in Nottingham, where the workplace parking levy has directly helped finance tram improvements.

4.4. In Stockholm, a network of cycle tracks, lanes and quite streets, alongside pedestrianised areas, a rail, metro and bus network enables easy, sustainable transport while a charging system deters traffic and reduces congestion. Stockholm's charging system charges each time a 'gate' is passed – generally placed on bridges around the inner city. Charges are relatively low (between approximately £1-2). The user then pays each time they cross into the city, which the highest charge levied during peak times – this acts as a deterrent to through-traffic and encourages users to complete their business in one visit. The London zone, in contrast, can be entered and left any number of times throughout the day. In addition, Stockholm's charge varies between the peaks,

inter-peak and night time.[4] This demonstrates the potential that minor modifications to the London congestion charge could have on congestion levels.

4.5. The Italian city of Florence operates an "access control" area based scheme. If you live in one area you can drive in that area, but you have to pay to cross boundaries to another area. This makes cars much less practical for short-trips and therefore reduces traffic in residential streets, making them more pedestrian and cycle friendly.

Charging for road usage

5. How effective is the Congestion Charge? How should this scheme be modified?

The congestion charge is hugely effective but relies on sustainable transport options

5.1. Initial results demonstrated the congestion charge was effective in reducing traffic levels and congestion in central London. The immediate impact of the charge was to decrease traffic levels by 18%, reduce congestion some 30%. Cycling and bus use promptly increased after its introduction, though these have been further supported by the reallocation of road space and signal time.[5]

5.2. Without the charge, London would potentially be in a much worse position as a result of traffic and congestion. Given the increase in traffic levels in central London the charge is in need of review and adjustment.

5.3. It is Sustrans view that the congestion charge has been a hugely effective tool in shifting travel to more sustainable modes and encouraging more efficient use of the roads by all sectors, but that this shift is only made possible by continued investment in public transport, walking and cycling and with planning policies that increase London's density and reduce the need to travel.

Road pricing should match London's economic activity and geography

5.4. Earlier this year, the outgoing Mayor, Boris Johnson, admitted the congestion charge should been increased or reformed when he said "Doing nothing with the roads would not return us to some never-existent fifties Elysium of free-flowing traffic. Doing nothing would mean that congestion gets worse than it is now." [6]

5.5. As London's population grows and pressure on transport capacity increases, it is vital that this disincentive to road traffic is responsive to the challenges and opportunities ahead.

5.6. The Mayor should undertake a full feasibility study into the introduction of an extended, usage-based road charging scheme for London, covering as much of Greater London as is viable.

5.7. This should explore the geographic expansion of the current zone, as employment has grown around the periphery of the current zone, and the creation of new zones around growing town centres in outer London.

5.8. The Mayor should also consider, and model the impact of, modifications to the congestion charge to better target freight vehicles while using the revenues to support freight consolidation and helping businesses to manage demand, as successfully demonstrated during the 2012 Olympics.

6. To what extent would a usage-based road pricing regime help reduce congestion?

6.1. A usage-based road pricing regime would potentially be the most effective way to reduce congestion. Congestion affects particular places and particular times of the day. Current levies, taxes and charges are sensitive to these variations. Consideration would have to be given to the type of road, type of vehicle, distance travelled and time of day.

6.2. The insurance company Norwich Union run a pay-as-you-go scheme that offers a potential model for usage based charging, whereby insurance is charged according to the amount driven and the locations – to match insurance premiums with the riskiness of the roads driven on and times of day.[7] However this should only be considered as part of a full feasibility study by TfL to establish the most cost-effective way to link charging levels to usage.

7. How might the Ultra-Low Emission Zone and Emissions Surcharge affect congestion levels?

7.1. Sustrans has welcomed the Ultra-Low Emissions Zone but urged the Mayor to go further – covering more of London and progressively tightening vehicle standards over time. However it is a different policy tool for a different objective and we expect a small impact on congestion over time.

7.2. TfL is best placed to estimate, monitor and evaluate scale and scope of the ULEZ and T-charge impact on vehicle use.

8. What would be the benefits and drawbacks of these other interventions?

Tolling for river crossings or other major infrastructure

8.1. Sustrans considers that new road infrastructure would incur a huge detrimental impact on London by increasing traffic volumes as a result of induced or generated traffic. Even with tolls on new capacity, we would expect a significant level of induced traffic.

Workplace Parking Levy

8.2. A workplace parking levy, similar to the system in Nottingham, would be a useful tool to reduce commuting traffic and potentially provide a solution to congestion beyond the congestion charging zone in lieu of other road pricing regimes. It is important that revenue is hypothecated to capital investment in sustainable transport or revenue to support businesses and their employees to manage demand and travel more sustainably.

8.3. Unlike the congestion charge or a road usage based system, the workplace parking levy charges for parking rather than car use and is therefore less flexible or targeted to specific times or locations where congestion is experienced. It also depends on off-street parking within the place of work.

8.4. TfL is best placed to estimate, monitor and evaluate the scale and scope of options for a workplace parking levy.

Devolving Vehicle Excise Duty to London

Unanswered

Measures to target specific types of vehicle

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Pricing commensurate with the congestion impact

9.1. A road pricing scheme that distinguishes between different vehicle types and times is potentially the most effective way to reduce delivery vehicles. Charging provides the economic signal or framework around which operators can then work. As outlined below, TfL resources can support businesses to positively manage these impacts, learning from its experience leading up to and during the 2012 Olympics.

Working with industry to improve efficiency

9.2. The Mayor should establish a working group or task force with TfL, the logistics sector and online businesses tasked with maximising the efficiency of van use for deliveries and reducing overall use. A note for the roads task force suggested vans could be used more efficiently, with the average load factor for vans in London at 38%.[8]

9.3. The success of TfL's Construction Logistics on Cycle safety (CLOCs) programme to improve road safety in the construction sector shows what the private sector can achieve when brought into collaboration with the public sector. Similarly, TfL's recent efforts to manage the impacts of construction demonstrate what can be achieved when TfL resources are put to a task. For example, by working in partnership with Shard Place, TfL estimate that they saved 29,000 HGV kilometres from London's roads through small changes to practices in this one construction project.[9]

Planning policies to favour freight consolidation for construction and servicing new developments

9.4. Consolidation centres provide the opportunity to maximise the efficiency of deliveries into central London, by consolidating materials at another location and ensuring a full load at least one way if not both. For example, by collecting waste for the return trip.

9.5. The construction project proposed for 22 Bishopsgate in the City of London includes an off-site consolidation centre for both the construction phase and during the building's use. Deliveries and collections will be consolidated into the same vehicles, reducing the number of LGV and HGV trips significantly.[10]

9.6. The Assembly should investigate the potential for freight consolidation and urge the mayor to further increase the uptake of freight consolidation to reduce traffic from delivery vehicles through planning policy, road-use charging and TfL support to industry.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

10.1. Figures from TfL suggest a significant increase in private hire vehicles, with a 20% increase between 2013 and 2014 alone. It is not clear if this has led to increased traffic levels.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

11.1. Car clubs are a useful part of the solution, by providing access to car when needed, but not as convenient as car ownership. This is an important part of the transport options available for people to fulfil their everyday needs.

11.2. There are a number of barriers to the roll-out of car clubs identified in the IPPR's London Global Green City report. The Mayor, TfL and boroughs should focus efforts on overcoming these.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Unanswered

Encouraging modal shift

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

The congestion charge has been a driver of the shift to public transport and active travel, a new charge can further encourage shift to public transport and active travel.

13.1. It is important to reiterate the introduction of the congestion charge saw major increases in bus patronage and cycling levels in to the charging zone. It has enabled the reallocation of road space to more efficient modes and helped drive behaviour change. It is a similar effect to that of the recent charge for plastic carrier bags.[11]

Investment in walking and cycling infrastructure and complementary measures is preventing further congestion

13.2. It is absolutely vital that more and safer cycling infrastructure is built. It is key to ensure it is a realistic choice for everyday journeys and one that moves people more space-efficiently.

13.3. The roll out of Cycle Superhighways (CS), Quietways, Mini-Hollands and other schemes that bring improvements to London's streets and public spaces help bring clean, healthy and cheap transport to our capital. Alongside this there should be a continued focus on providing the information and support Londoner's need to consider cycling.

13.4. Cycling over Vauxhall Bridge increased 73% after the introduction of protected cycle lanes (CS5), while cycling on Blackfriars Bridge (CS6) increased 55%. Early figures from Quietway 1 show increases in use of up to 40%.[12] This demonstrates that the current approach is working well and providing alternative means of travel.

13.5. Early counts suggest 1,200 people per hour are using the new superhighway in the peak, using a fifth of the space required to move those people by car.[13]

13.6. A similar approach needs to be taken for walking, with a strategy focussed on improving connections around public transport and at key destinations, such as in town centres. We believe there needs to be greater focus on pedestrianisation, semi-pedestrianisation and car-free days around local high streets. A focus on reducing traffic in residential areas will bring mutual benefits

to walking and cycling, such as in Walthamstow's mini-Holland scheme, where a number of roads have been closed to through-traffic, but open for walking, cycling and residential car-access.

Continued investment in public transport is vital

13.7. Further investment in public transport is needed to improve transport choice in areas of London that are currently cut-off from the bus, tube and rail network, as well as areas where services are under pressure. To encourage mode shift, Londoners need more transport choice including better rail and underground services.

Planning policies that increase density and activity around public transport can prevent future congestion

13.8. Over the long term, TfL's approach to development planning will be key. The design of Crossrail 2 stations and surrounding development must ensure the walking, cycling and public transport are first choice for new residents and that car use is discouraged.

13.9. Sustrans is currently exploring the possibility of an Active Travel Accessibility Levels tool with ARUP to concentrate new housing development near existing and proposed walking and cycling routes where public transport access if poor.

Providing new road infrastructure

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

14.1. New road capacity leads to induced or generated traffic, which worsens congestion by increasing traffic volumes on the network. New road capacity is generally not the solution.[14] [15]

14.2. It is Sustrans view that new infrastructure for public transport, walking and cycling will support further shift away from private car use and help reduce overall congestion. Congestion for buses can specifically be overcome by bus priority infrastructure.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

15.1. New roads will encourage more people to drive. Even with tolling it is likely that traffic levels will increase as a result of new land becoming accessible for development and the generation of travel from new residents and businesses on those sites.

15.2. Congestion generally maintains equilibrium, that is, the more road capacity created, the more traffic generated and congestion does not change.[16] This was observed with the second Blackwall Tunnel in the 1960s and the Dartford crossings more recently.[17]

16. How should new road infrastructure be funded?

Unanswered

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

Unanswered

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

18.1. Additional space for cycling and pedestrian infrastructure has improved the efficient of the movement of people in the city. Cycling generally moves five times more people through any given space compared to a private car.[18] These schemes are essential for reducing congestion by providing more efficient alternatives and attracting people to public transport.

18.2. There are currently 645,000 trips per day by bike in London. The more trips that are shifted to cycling, the less vehicles needed on the road. Infrastructure is vital to enable mode shift by overcoming safety concerns and making trips by cycling as, if not more, attractive than other options.

18.3. Walking, too, is a healthy, space-efficient and clean alternative for very short trips as well as part of other longer journeys. Walking is complimentary to all other modes of transport, particularly public transport, and therefore its promotion through infrastructure is vital to reducing congestion.

18.4. The Roads Task force states that, "In successful cities, there is a clear trend towards reducing the impact of motor traffic to improve the quality of life and make them more attractive to live in and to do business. Exciting new spaces for city life have been created, and they have delivered high-quality cycling networks and made cities great for walking."[19]

Active traffic management

Unanswered

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From: Terence Bendixson [redacted]
Sent: 13 August 2016 22:33
To: Georgina Wells
Subject: SUBMISSION BY TERENCE BENDIXSON

Dear Ms Wells

Please find below a submission to the London Assembly's Transport Committee investigation into traffic congestion.

Yours sincerely

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LONDON ASSEMBLY TRANSPORT COMMITTEE
Investigation into Traffic Congestion
Terence Bendixson

THE CASE FOR THE USE OF CONGESTION CHARGING

1. Relevant experience

a) While an official in the OECD Urban Division in the 1970s, I co-authored with the World Bank, a report on the then new road charging (supplementary licensing) scheme in Singapore. Both bodies subsequently advocated charging as a tool for managing traffic congestion and paying for infrastructure.

b) In *Instead of Cars*, Penguin Books 1976, I made a case for road user charging in cities.

c) While Secretary of the Independent Transport Commission from 1999 to 2010, I was asked to commission research from Professor Stephen Glaister, Imperial College, on the benefits of national road charging in England.

2. Congestion charging in London

a) The city's existing scheme gives it experience in the technology, traffic effects, revenue and public acceptance of charging.

b) It would seem to make sense to build on this experience. And this is due to be part of London's future Low Emission Zone.

c) Charging could be deployed to confront several of the problems identified by the Committee. These include traffic congestion itself,

disruption of bus services, increases in the cost of running bus services, air pollution, the lack of funds to pay for infrastructure,

and so on.

d) The existing charging technology is no longer state of the art and could be greatly improved.

e) A modern charging system could be designed to vary charges by time of day, emissions characteristics of vehicles and locality.

f) A modern system could be designed to put financial pressure on firms running small delivery vans serving online shopping to

combine deliveries in ways that would minimise miles travelled.

g) Consideration could be given to using smartphone apps to help users minimise their costs and to pay for their charges.

h) Charges in new districts could be introduced at a modest level to reduce their economic effect and allow adaptation and then

increased. All this should be well publicised as part of design of the scheme.

3. Geography of charging area

i) Charging could be applied to a variety of different areas but, whatever the initial area chosen, perhaps London within the North and

South Circular Roads, charging should be introduced with the objective of extending it to cover all of Greater London inside the

M25.

j) Any general scheme of road charging should be designed in conjunction with what is planned for the LEZ.

4. Revenue

k) Transparency in the use of revenue is essential. All surplus funds should be devoted to eliminating pinch points in the road system

and expanding the capacity of public transport.

l) Consideration should be given to setting up a scrutiny and advice committee to make recommendations to the Mayor about levels of

charges and the use of revenue. Such a committee could include representatives of business, motoring, civic and other groups.

5. Equity

m) Very many households in London do not own cars. Those on low incomes are least likely to own cars and therefore least likely to

have to pay any road charges. They would, however, benefit greatly from improvements to the quality of bus services. Road charges should not therefore be seen as fundamentally regressive – though there will be exceptions and hard luck stories.

n) There will be demands that residents within new charging zones should be given exemptions. Every effort should be made to resist the giving of such exemptions since this would frustrate the objective of London-side charging. Residents, like everyone else, should be encouraged, through charging, to travel on foot, by bicycle and by public transport, to join car clubs and, in every way possible, to reduce the volume of cars travelling and parked within Greater London.

. Conclusions

London's existing road charging system is small in scale and old fashioned in technology but experience with it is an asset of the greatest value. It should be built on.

Charging is expected to be part of London's future Low Emission Zone.

Charging is by far the most efficient method for managing road traffic and given that low income households are least likely to own and use cars in London, it is not fundamentally regressive.

The policy objectives should be clean air and better bus services: charging should be used as a tool for achieving these goals.

The Transport Committee it urged to give charging careful consideration with a view to promoting a sophisticated, London-wide road system that would address the problems of traffic congestion and air pollution and make a contribution to transport revenues.

I am grateful to the Committee for this opportunity to submit these observations. Please note that this submission is made in a private capacity and does not necessarily represent the views of my University or the Chelsea Society

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London Assembly Transport Committee: Congestion Investigation Call for Evidence

Transport for London submission

Introduction

In his manifesto, the Mayor committed to keep London's roads moving, acknowledging that 'congestion on London's streets continues to cause real problems for many motorists, and is a real drag on business competiveness'.

Our priority is to keep London moving, working and growing, and make life in London better. With London's population forecast to grow from 8.6m people to around 10m by 2030, current initiatives to limit congestion are not enough to maintain an efficient road network and ensure London's continued success as a world city.

There has been an 11 per cent mode shift over the last 15 years away from private transport, as policies which favour public and sustainable transport have been introduced. While reallocating road space to achieve this shift has made journeys for motorised vehicles slower in some locations, it allows for an efficient road network as more people can travel on the same amount of road space.

We are making plans for a city with fewer cars in it and a further shift towards sustainable transport. Our new 'Healthy Streets Approach' will be integral to our strategy to reduce traffic, as we work towards a safer and more attractive city for pedestrians and cyclists by making it even easier for people to take public transport, walk or cycle.

Immediately after the 2012 Games, London's road and bus networks were operating at record levels of performance in terms of traffic and bus reliability, while disruption from roadworks, collisions and breakdowns was minimised.

Our Travel Demand Management strategy – which played a vital role in ensuring that transport was a success during the Games - exists to ensure customers can make better informed decisions about their travel, by enabling and encouraging customers to avoid time and locations where there is disruption and/or high demand. This includes timely advice about upcoming planned events, maintenance or network changes on the roads. Evidence shows up to 18 per cent more drivers than usual re-time or re-route their journeys around road works where we have delivered enhanced communications and travel advice.

Since the Games, economic and population growth has led to increased congestion, and has been heightened by the construction of road schemes, such as Cycle Superhighways and new commercial developments. As a result, there has been a 20 per cent reduction in bus reliability and a 30 per cent increase in excess traffic delays during the afternoon peak in central London.

While short-term Travel Demand Management work is necessary to limit congestion on a day-to-day basis, a longer-term strategic focus on mode shift towards the more space-efficient means of transport is required to solve the congestion problem for the future. Our approach will tackle the dominance of traffic, make our streets better for people and tackle the causes of air pollution by not only reducing the number of vehicles on our roads but

making sure that those that remain are clean. It is vital that the remaining traffic on London's roads, especially freight, services and buses, can travel efficiently, reliably and safely.

We welcome the Committee's investigation and look forward to discussing the options outlined in this consultation in more detail.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

Appendix 1 highlights the trend in road congestion since 2006. Average traffic delay had remained relatively stable since 2006. From 2013 onwards, however, there has been an increase in average traffic delay across London, particularly in the afternoon peak.

In 2014/15, on weekdays the greatest delay occurred in the afternoon peak. On weekends the greatest delay occurred during the middle of the day. This same pattern of delay was found in 2008/09.

The greatest increase in delay in the afternoon peak is in the central area, where average traffic delay has increased by more than 30 per cent. The increase in traffic delay during the inter-peak in outer London is much lower than all other sectors and other time periods in London, increasing by only 5 per cent between 2008/09 and 2014/15.

Taking into account the total length of the Transport for London Road Network (TLRN), Strategic Road Network (SRN) and Borough Principal Road Network (BPRN) in London, central London traffic experiences the highest aggregate annual delay per km of road (4.9 million mins) followed by inner London (3.4 million mins) and outer London (2.5 million mins). The total annual vehicle delay in 2014/15 was 13,135 million mins, equivalent to a delay of 2.85 million mins per km. This represents an increase in total delays per km of 14 per cent compared to 2008/09 when delays were 2.5 million mins per km. While central London had the greatest level of delay, it accounts for only eight per cent of London's total delays because fewer vehicles use central London roads than use roads in inner or outer London.

2. What are the key causes of these changes in congestion?

Congestion is determined by the available road network capacity and the level of traffic.[1] As congestion increases, it reduces demand. Alternatives to travelling on the roads exist for many users, so congestion tends to be self-limiting, but that can affect people who rely on private transport and has wider economic impacts.

The main cause of congestion is demand for road space, alongside planned road schemes. Another lesser cause is unplanned disruption, including breakdowns and collisions. Although

[1] When considering congestion and road space, it is important to consider road capacity in terms of 'total people movement' and not simply as the quantity of motorised vehicle traffic. The low average occupancies of private vehicles and the space efficiency of sustainable modes (buses, walking, cycling) must be taken into account. However, the delays described in the response to questions 1-3 relate to delays to motorised vehicular traffic only.

traffic volumes have been falling over the long term, they have recently increased in all parts of London. In July, traffic growth was as high as it had been at any point since 2008.

Increasing traffic volumes alongside unprecedented construction affecting London's roads has led to increased average traffic delay.

We, and other London highway authorities, have reallocated road space away from private vehicles particularly in inner London to improve road safety, increase bus service reliability, and to improve facilities for pedestrians, cyclists and taxis. This includes segregated bus and cycle lanes. Within the Congestion Charging Zone, we have sought to discourage car use to reduce demand, to encourage more efficient use of road space and to reduce environmental impacts.

There has been increasing demand for some types of transport which use the roads. For example, cycling journeys have increased by 10 per cent since 2013 and have more than doubled since 2001. The number of daily cycling journeys is now equivalent to 10 per cent of bus journeys or 20 per cent of Tube journeys. Bus ridership has also grown by 77 per cent since 2000 to over 6.5m journeys each day.

The reallocation of road space has been an important factor in this trend. The carrying capacity of roads can increase through road space reallocation; two weeks after opening, the East-West and North-South Cycle Superhighways were moving five per cent more people per hour than they could without cycle lanes, a number that will increase as it attracts more cyclists. Because cycling is such an efficient use of road space, in central London, these policies can enable the movement of more people using the finite amount of road space.

Private developments and large infrastructure projects have also had an impact on congestion levels. For example, Crossrail construction has resulted in changes to road space and junctions, both temporarily while major infrastructure is built and permanently as a result of road space being reallocated.

Road space reallocation and the scale of development in London have resulted in reducing the road capacity available for car users in certain areas. This has led to a reduction in traffic volumes, but static (and more recently, rising) levels of congestion.

Congestion can also be caused by unplanned network incidents, such as breakdowns, collisions and unplanned roadworks. To deal with these incidents, we use an intelligence-led approach to deploy cameras and on-street resources, including parking enforcement, to strategic locations and the most vulnerable parts of the road network.

3. What impact does congestion have on Londoners, the city's economy and its environment?

We want to ensure that everyone can rely on how long their journey will take whether they are driving, using the bus, delivering freight, cycling or walking. Congestion adversely impacts

business competitiveness, a city's reputation and has negative environmental and health impacts.

Londoners
Reallocating road space creates more space for walking and cycling, encourages reduced reliance on cars, and enhances quality of life, even if this results in some increases in some congestion for motor vehicles. Over the longer term, this will also result in further increase in the proportion of people using sustainable transport, so long as a range of public transport options exist. This makes it an important approach in key areas like central London, where the efficiency of the road network needs to be maximised, and where there are the most alternatives to people for many of their journeys.

The benefits of making more sustainable and active travel choices can be huge for Londoners' health. Currently only 34 per cent of adults in London report having walked or cycled for two 10 minute periods (or more) on the previous day.[2] This is the basic level of activity that adults need to maintain good health, and working this level of activity into daily travel routines is the only proven means of keeping populations active throughout their lives.[3] Low levels of active travel amongst some Londoners are contributing to rising levels of obesity, Type 2 diabetes, heart disease and some cancers.[4] In London, car ownership is the strongest determinant in whether a person is achieving this basic level of activity[5] and increasing active travel amongst car users is a public health priority.[6]

Our analysis[7] shows that around a third of all car journeys made by London residents do not have a realistic alternative available. These are in predominantly less well-connected parts of outer London. In these areas, the rate of congestion has increased less than in central and inner London, but the impacts can be greater as cars are relied on more in the absence of better public transport links.

The challenge we face is to make the improvements to streets and public transport that will provide viable and attractive alternatives to private vehicle use, while ensuring that we prioritise road space for journeys that bring the most benefit to the health and wellbeing of Londoners, such as walking, cycling, and buses, as well as essential freight and servicing journeys and those car journeys that have no good alternative. These priorities and how we will address them will be set out in the draft Mayor's Transport Strategy next year.

London's economy
The economic cost of congestion has traditionally been calculated based on vehicle delay for

[2] Travel in London report 8 p. 177 http://content.tfl.gov.uk/travel-in-london-report-8.pdf
[3] Start Active, Stay active http://webarchive.nationalarchives.gov.uk/20130107105354/http://dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_128210.pdf
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[6] Health impacts of cars in London https://www.london.gov.uk/sites/default/files/health_impact_of_cars_in_london-sept_2015_final.pdf
[7] http://content.tfl.gov.uk/technical-note-17-the-availability-of-realistic-alternatives-to-car.pdf

a given period, compared with a 'free-flowing' period, usually night time. Using this approach, we estimate the annual cost of congestion in London[8] to be around £5bn for 2016.

However, measuring congestion against free flow conditions does not give an indication of economically optimal levels. In reality, inefficiency is caused by drivers imposing more costs (congestion) onto other road users than the benefit they are experiencing by making the journey. This is why we focus on optimising journey time reliability and bus excess wait time reliability. We also use bus reliability as a way of measuring overall traffic performance. Our analysis of 'inefficient congestion' estimates it may cost around £1bn a year.

The economic impact of congestion varies by spatial area. Delay per vehicle per km increases from outer London towards central London. The economic cost of delay increases from central to outer London.[9]

Freight relies on the road network and other businesses and road users tend to rely on trips at a time when the road network is busiest. Freight trips make a significant contribution to London's economy and support £6-10bn gross value added. Congestion reduces the efficiency of freight trips because more vehicles are needed to maintain the same level of servicing and deliveries and unreliability can have significant business impacts, particularly for certain sectors like construction.

The environment

Traffic levels affect the environment in a number of ways, particularly due to vehicle emissions. London currently exceeds limits for Nitrogen Dioxide. Some 50 per cent of Oxides of Nitrogen (NOx) emitted in London come from road transport and larger, older diesel vehicles typically have a worse emissions record. The Low Emission Zone and the Ultra Low Emission Zone will encourage drivers into lower emission vehicles through the use of road user charging, and we have taken measures to reduce emissions from our bus fleet, as well as taxis and private hire vehicles. Vehicles' speed can also change the volume of emissions. At low road speeds, higher emissions are observed, although lower speeds provide wider benefits for road safety and the attractiveness of streets for walking and cycling, which may in time reduce overall emissions.

Emissions from new vehicles must meet the latest Euro Standard limits. While vehicles have demonstrated lower emissions in official tests compared to 'real world' conditions, the latest Euro VI vehicles have demonstrated improved performance on the road, particularly heavier vehicles. For older vehicles, retrofit technology, such as that developed for our bus fleet, has brought substantial reductions in Particulate Matter and NOx emissions. Plug-in vehicles also deliver lower emissions of air pollutants and CO2.

[8] Based on the DfT's WebTag methodology, adapted to represent London traffic volumes and mode mix. http://content.tfl.gov.uk/total-vehicle-delay-for-london-2014-15.pdf.

[9] Central London accounts for 8 per cent of the total cost of delay on the Transport for London Road Network (between January 2010 and December 2015), inner London 27 per cent and outer London 65 per cent

4. What can London learn from other cities in its effort to reduce congestion?

We work with other world cities to identify best practice and look for new approaches. Compared to many other cities, London has a constrained road network. This brings unique challenges so not all solutions that have been successful elsewhere will necessarily work here. The things we have learned from other cities include:

- Road space: Some cities have gone further than London when reallocating road space. For example, in Paris road space has been reallocated to promote more sustainable travel options, combined with improvements to the orbital road network.
- Demand management:
    - In Singapore, charges depend on the time of day and size of the vehicle
    - In the United States, California and Oregon are using technological advances to trial 'usage based charging' to tackle congestion
    - Nottingham and Perth, Australia have successfully introduced a Workplace Parking Levy to reduce congestion and provide funding for transport improvements
    - In Copenhagen, Denmark, a parking strategy increased paid parking to reduce commuter traffic by car, built new parking spaces (mostly underground for resident parking) and closed 1,000 on-street parking spaces in inner metropolitan districts. This strategy served to make room for more recreational urban spaces and reduce commuter traffic by car.
- Replacement capacity using road tunnels: A review of international best practice showed that new tunnelling has been successful in other cities to tackle congestion, but high costs and disruption during construction means this is not considered a preferred approach for London.
- Land use and transport integration: The location and design of new homes in London determines how people travel. In Freiburg (Germany), the provision of local services and jobs, proximity to the city centre, extensive walking and cycling infrastructure and good public transport provision has resulted in a reduction in car ownership, a mode share of 64 per cent for active travel, and only 16 per cent of trips made by private car.

We also participate in the CREATE[10] project, funded by the European Union's Horizon 2020 initiative. This three-year research project, which is to conclude in 2018, seeks to understand the underlying causes of transport trends over the last four decades, so that planning for the future can be better informed.

5. How effective is the Congestion Charge? How should this scheme be modified?

The Congestion Charge has been successful in reducing traffic volumes in central London since its introduction in 2003. It is a well-understood and recognised scheme. Compliance levels are around 98 per cent and customer satisfaction with the scheme is 86 per cent. The Congestion Charge had an immediate impact on traffic volumes entering the Congestion Charging zone, which fell by 18 per cent during weekday charging hours and circulating traffic

[10] Further details of this project can be found at: http://www.create-mobility.eu/

reduced by 15 per cent[11]. As a result, congestion in the Congestion Charging zone reduced by around 30 per cent.

All revenue generated by the Congestion Charge is reinvested in transport in the Capital. Over the last 13 years, £1.6bn net revenue has been generated and reinvested.

As a result of providing more road space for walking and cycling, and improvements to public transport, urban realm and road safety, congestion levels in the Congestion Charging Zone returned to similar levels seen before the scheme five years after its introduction, despite there continuing to be less traffic. However, without the Congestion Charge, congestion in central London would be worse.

Since the scheme was introduced, a number of changes have been made, such as the ability to pay the next day, the introduction of Congestion Charge Auto Pay and the implementation of the Ultra Low Emission Discount. We continue to keep the scheme under review and further changes are being made this year, including the introduction of a smartphone payment application.

The Mayor's proposal to introduce a £10 Emissions Surcharge (dubbed the 'T-Charge') on the most polluting vehicles entering central London is also expected to have a small but useful impact on reducing congestion in addition to its clear contribution to reducing air pollution. This proposal is currently being consulted on as part of the Mayor's Clean Air Action Plan consultation.

6. To what extent would a usage-based road pricing regime help reduce congestion?

The effectiveness of any usage-based road pricing scheme in reducing traffic volumes is dependent on the charge level and the spatial and temporal structure of the charge. However, the impacts of usage-based charging are largely untested, the technology requirements are complex and there are significant potential social and economic impacts which would need to be better understood.

There are potential advantages including:

- Usage-based charging offers more flexibility to target specific types of trips and/or vehicles and could take account of time, location, distance and vehicle type
- Longer trips place greater demand on road space, so it seems appropriate to charge drivers more at congested times, proportionate to the distance driven (although shorter urban trips may be the easiest to shift to other modes such as walking and cycling).
- Charging levels could be set to reflect the value of the road space. For instance, higher rates could be set in central London in the peak and lower rates in outer London outside of peak periods.

[11] Congestion Charging Impacts Monitoring Reports can be found at: https://tfl.gov.uk/corporate/publications-and-reports/congestion-charge)

- It offers the opportunity for a holistic approach to road user charging and to integrate other charging mechanisms that already exist.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

The Ultra Low Emission Zone (ULEZ) and the proposed emissions surcharge are not focused on reducing congestion. Rather, they seek to encourage the use of cleaner vehicles by placing a daily charge on more polluting vehicles that enter central London.

We are consulting on charge levels and are seeking to achieve a level that makes financial sense for frequent users of the zone to change vehicles, without prohibiting entry to occasional users who contribute less to pollution. While congestion reduction is not an objective of the scheme, there may be a reduction in vehicle use. Although we estimate that in 2020 we could see a five per cent reduction in kilometres travelled by cars within the ULEZ[12], this would not be sustained over time as more vehicles become compliant. The standards of the emissions surcharge are less stringent than the ULEZ, which limits its potential to achieve overall traffic reduction. We are still assessing this policy and further information will be provided during a consultation in the autumn.

The Mayor has announced his intention, subject to consultation, to expand the ULEZ. We will estimate the extent to which they reduce vehicle trips as this policy develops.

8. What would be the benefits and drawbacks of these other interventions?

Tolling for river crossings or other major infrastructure
Benefits of tolling include:

- Fairness: Those who benefit most directly from the scheme help to fund it
- Managing demand: Without managing demand, the benefits of shorter journey times will be lost to increased traffic
- Managing the type of demand: A toll can be designed to incentivise certain types of vehicles such as cleaner vehicles, or to re-time journeys
- Managing impacts: Social and environmental impacts such as emissions or noise can be mitigated

Drawbacks of tolling include:

- Inequity: Where some infrastructure is tolled and not others, it may be perceived as unfair
- Social and economic impacts: Tolling may disproportionately impact lower-income groups.

[12] https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user_uploads/ulez-supplementary-information---final-291014.pdf (Appendix 10)

Workplace Parking Levy

Workplace Parking Levies can help tackle congestion by promoting sustainable modes of transport, while providing a source of revenue for funding public transport. A levy would need to be accompanied by investment in public transport in these areas to provide viable alternatives to private car use.

Nottingham is currently the only European city that has introduced a levy, but there are a number of reasons why a levy in London may be less successful:

- In London, commuting patterns tend to be different and commuting by car, particularly to locations such as central London and Canary Wharf, tends to be low. Therefore, a Workplace Parking Levy may not have significant impacts on congestion in these areas.
- While a Workplace Parking Levy may be more effective in outer London, where more people commute by car, in the absence of extra investment in public transport links a levy could affect access to employment.

However, car use is still high in some areas, even where good public transport links exist, so measures to manage demand are likely to play a role in any long term strategy to tackle congestion.

Devolving Vehicle Excise Duty to London

Londoners pay about £0.5bn a year to central government through Vehicle Excise Duty (VED). The way VED is allocated and spent in the UK is changing, with all VED in England going into a Roads Fund to pay for investment in the English Strategic Roads Network (managed by Highways England) from 2020. As we manage strategic roads within Greater London, under current proposals London would be generating a significant proportion of this funding to be spent almost exclusively outside London.

Following the 2015 spending review, our operational grant from central government will be removed from 2018/19. Public transport users will effectively be subsidising the cost of operating the Transport for London Road Network, including traffic signals, as well as borough roads through LIP funding.

We are making the case for a new link between roads tax and roads funding to be applied in London as well, to allow us to continue modernising London's road network. There is also scope for a wider debate about how Londoners pay for road use in the future, which could better account for the impacts of different usage, rather than simply paying VED based on ownership, to reduce congestion and benefit the environment.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Between 2001 and 2031, van trips are forecast to rise by 26 per cent, which represents a significant proportion of all forecast traffic growth.

We work with operators, boroughs and others across the freight industry to ensure goods and services are delivered efficiently, safely and with the least impact on the environment possible. Our behaviour change programme encourages operators to re-time trips to outside peak hours and consolidate trips.

Our challenge is to minimise the impact of freight and service trips on congestion, while recognising the important role of freight in London's economy. We are gathering evidence to help inform future freight policies, which will form part of the London Plan and Mayor's Transport Strategy.

New measures, which will build on existing plans to manage freight and delivery vehicles could include encouraging more trips by water, rail, powered two-wheeler and bicycle, encouraging more consolidation, ensuring freight uses the right routes and delivery points, and encouraging deliveries outside peak periods. Our behaviour change programme has been successful in managing freight, however it cannot engage all operators to the same degree. New mechanisms, such as restricting access or charging could be considered. The scale of London's challenge also means that policies need to address the whole supply chain to influence customer and operator behaviour as well.

10. To what extent is an increase in minicabs contributing to traffic congestion and how could this issue be addressed?

The taxi and private hire industry are an integral part of London's public transport system and play a vital role in supporting business and tourist growth. They provide safe and accessible services, often operating in locations and at times when other public transport modes are unavailable. They also provide an important transport option for households which do not own a car. Over the last few years, new technology has significantly changed the operation of the industry for the benefit of consumers, but has also brought with it a number of new challenges including the rise in the number of private hire vehicles (PHVs) and their impact on congestion.

A number of indicators suggest that PHVs are increasingly contributing to congestion in London:

- The number of PHVs on London's roads is increasing rapidly (from around 59,000 in 2009/10 to around 109,000 today). Over the same period there has been a small decrease in taxi numbers from around 25,000 to around 24,500 today.
- Since 2013, the number of PHVs entering the Congestion Charging zone during hours of operation has increased by 54 per cent to around 15,000 vehicles a day. This means they now make up 13 per cent of motorised traffic and 38 per cent of car traffic in the zone. This is approximately double the proportion of taxis, which make up around 20 per cent of car traffic.
- Outside of charging hours the figures can be even higher with up to 30,000 PHVs entering the zone on Saturdays.

The following initiatives could help to manage the impact that PHVs have on congestion in the future:

- In 2015, we requested that the Department for Transport (DfT) investigate proposals for primary legislation that would allow us to limit the number of taxi and private hire vehicle licences that it issues. Currently, we do not have the power to do this. This power would allow us to take measures to reduce congestion and the consequent environmental impacts of it. National issues of cross-border hiring will need to be addressed at the same time to prevent operators setting up in another licensing authority and continuing to work in London.
- We are analysing the feasibility of removing the Congestion Charge exemption for PHVs. This work is expected to be complete by the end of summer and any proposals which arise would be consulted on later this year. Proposals will need to take account of any impact on the private hire industry as well as congestion and air quality.

We are continuing to work with the DfT and the industry to consider the best way to reduce the impact of PHVs on congestion.

11. What contribution can car clubs make to tackling congestion and how can the Mayor and TfL encourage these?

Car clubs can offer an alternative to private vehicles and reduce levels of private car ownership. They also bring benefits such as less demand for car parking, access to cleaner vehicles, improved air quality (particularly when electric vehicles are used in the fleet) and promote a greater use of sustainable transport.

Research conducted by Carplus[13] estimates that each car club vehicle removes 10.5 private vehicles from London's roads and indicates that members cycle and use public transport more than the average Londoner. Other research suggests that car clubs result in lower annual vehicle mileages and higher passenger occupancy rates in vehicles, meaning that car club vehicles are used more efficiently than many private vehicles.

Currently, the contribution of car clubs to reducing congestion is marginal because they appeal only to a small percentage of car users and tend to enable non-car users to make car trips rather than discouraging car owners from owning a car or making fewer trips.

The biggest potential for car clubs is as part of a package of measures to promote sustainable travel, such as car-free developments. They could also play an important role in areas of London that are less accessible by providing access to a car for households, without needing to own a vehicle.

[13] We commission a trade body, Carplus, to promote and oversee the car club industry

12. To what extent could greater efficiency in the provision of bus services help to reduce congestion, and how?

Around 6.5 million journeys are made on buses a day, making a signifcant contribution to reducing congestion, as they carry large numbers of people in comparison to the amount of road space they take up. Recent declines in bus speeds have resulted in a decline in bus passenger journeys, from 2,385m in 2014/15 to 2,314m in 2015/16. To encourage use of the bus network as part of the shift to sustainable transport, we must ensure it is reliable.

Targeted bus priority and investment, such as bus lanes, improves bus reliability and reduces journey times, while reducing the number of vehicles required to operate the same frequency of service. To reduce the impact of congestion and its effect on bus reliability, we invested £15m in reliability schemes in 2015/16 with a further £10m invested to incentivise bus companies to improve reliability on routes in outer London. We plan further investment to improve bus reliability.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Over the last 15 years, we have seen a shift of 11 per cent from private transport towards public transport, walking and cycling. This is a result of transforming the bus and underground networks, investing in other public transport infrastructure and significantly improving the conditions for cycling and walking. A further shift could be encouraged by:

- Further enhancing infrastructure for public transport, walking and cycling
- Greater integration of land use and transport planning: The location and design of new homes in London should be considered alongside access to public transport
- Behaviour change measures: Working with the boroughs, we run initiaves to engage schools, workplaces and communities to promote sustainable transport and further measures could help reduce congestion further. These could include road user charging across London combined with reallocation of carriageway space to cycle infrastructure, improvements to the walking environment, filtered permeability, and parking restraint to encourage mode shift.

Our Healthy Streets Approach seeks to prioritise human health and experience in the transport network, by providing streets where more people and more diverse groups of people choose to walk and cycle. We are currently in the process of determining how best to embed this approach across our organisation and the network and will report on this work by the end of the year.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

There are certain places in London where new road infrastructure can help to reduce traffic congestion when combined with demand management tools such as user charging.

One example is Silvertown Tunnel, which is expected to relieve congestion at the Blackwall Tunnel. The Blackwall Tunnel currently suffers from three significant problems: severe congestion, frequent closures and incidents and a lack of network resilience. If it is approved following the Mayor's review and the Planning Inspectorate investigation, the Silvertown Tunnel would not only benefit motorised traffic but also enable a step change in the cross-river bus network provision in east and south east London.

Further cross-river connections also have the potential to reduce congestion, particularly through encouraging more sustainable and active travel choices. The Mayor is conducting a review of existing river crossing plans, with a focus on new public transport and active travel connections, and we are currently progressing work on a new walking and cycling bridge between Rotherhithe and Canary Wharf.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Aside from links to new developments, there is limited scope to build new roads in London, so our emphasis should be on optimising the existing network. We assess proposals for new infrastructure by considering the extent to which they reduce congestion and how they improve conditions for pedestrians, cyclists, public transport users, freight transport and local residents.

Taking Silvertown Tunnel again as an example, this would be acompanied by a user charge to manage demand and support public transport improvements by allowing for improved cross-river bus connections in the local area. The Mayor is currently reviewing this project to look at its merits, seek environmental assurances and to understand the wider benefits for pedestrians and cyclists. The Blackwall Tunnel will also be charged as part of the overall scheme. Therefore, a net increase in traffic is not anticipated.

16. How should new road infrastructure be funded?

We are not allocated specific funding for investment in roads from central government and instead fund our roads programme from revenue including grants, fares and other income including contributions from road user charging schemes, developer funding and current European funding. With the removal of all government revenue grant from 2018/19, our ability to invest in new infrastructure is limited.

We estimate that £30bn in investment is needed for London's roads over the next 20 years. Some funding options include:

- VED: As referred to in question 8, devolution could provide a funding stream for roads investment in the Capital
- Capital grants: In the absence of specific roads funding, such as VED, capital grants funded out of general taxation could ensure that the London road network receives the

necessary investment. These could be provided directly by central government or incorporated into a system of devolved business rates.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

There are around 420,000 works in London each year, around 34,000 of which take place on the Transport for London Road Network (TLRN). We have introduced a number of initiatives to reduce the impact of road works in London including the London Permit Scheme, a 'Report It' tool, increased monitoring on the TLRN, Automated Road Network Monitoring, and our Lane Rental Scheme.

We are improving the effectiveness of our Lane Rental Scheme by promoting the associated funds available to deliver initiatives that reduce disruption caused by roadworks by refreshing the locations where charges apply to ensure they continue to be the most sensitive parts of the network, by replacing systems to better control operational activities, and by improving co-ordination of road space that developers, contractors and utility companies need to occupy for new developments.

We will work with the GLA to urge central government for new regulations to increase the scope of roadworks offences, increase accountability of utility companies to maintain their apparatus, extend streetworks legislation to other industry sectors, make the case for a long-term highway damage contribution scheme by utility companies, and to make the case for charging for over-running works at weekends under existing legislation.

18. What effect has the additional road space provided for cycling and pedestrian infrastructure had on congestion?

Between 2014 and 2015, when construction activity on the roads was at its peak, delay per vehicle per km in central London on the TLRN in the morning peak increased by 34 per cent. The majority of this increase was due to an increase in long-term works.

However, we need sustained investment in cycling and pedestrian infrastructure to achieve further shift towards these forms of travel, which will reduce car use.

Private vehicles have low average occupancies and take up relatively more space, compared to sustainable modes of transport including buses. It is important to consider road capacity in terms of total people movement, rather than vehicle quantity. Our initial findings into the road space efficiency of the East-West (CS3) and North-South (CS6) Cycle Superhighways suggest that at peak times, the new cycling infrastructure theoretically moves an average of 46 per cent of people along the route at key congested locations, despite occupying only 30 per cent of the road space. Two weeks after opening, the East-West and North-South corridors are moving 5 per cent more people per hour than they could without cycle lanes.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

We believe that technology can enhance the performance of the road network. For example:

- Surface Intelligent Transport System: This system enables faster, automated response to live road conditions to reduce delays.
- Real-Time Origin Destination Analysis Tool (RODAT): This is a tool built to understand changes in traffic flows by vehicle type across Greater London, including buses, as they enter central London. It builds on current camera and sensor infrastructure across London's road network and will allow control centre operators to respond to traffic flow changes before they become an acute congestion problem.
- Differential (iBus) Bus Priority: We have been trialling an upgrade to the system we already install at signal junctions to give buses priority. Selective priority for specific buses could improve overall bus journey time reliability and improve road junction efficiency.
- Pedestrian Call Cancel: We have started rolling out some of the latest pedestrian detection technology allowing the green man time to be cancelled if the pedestrian has already crossed the road. This reduces unecessary vehicle stops but can also help reduce overall wait times for pedestrians.
- Split Cycle Offest Optimisation Tool (SCOOT): SCOOT is an automated, intelligent traffic signal control system that can dynamically change signal timings to best suit prevailing traffic conditions and reduce stops and delays. SCOOT has been proved to reduce delays by an average of 12 per cent.
- Signal Timing Review: This programme allows traffic signal engineers to review groups of traffic signals in close proximity. The review allows the technology used at junctions to be set up based on the time of day and we review approximately 1,000 of our 6,300 junctions each year.

20. How effective has the Road and Transport Policing Enforcement Team been in tackling congestion?

We fund, and work closely with, the Road and Transport Policing Command to introduce measures to tackle congestion, including introducing new technology (eg laser scanners to speed up survey work), and new procedures to streamline the handling of incidents.

Eighty Road and Transport Enforcement Officers (RTEOs) were added to our enforcement team in May. These officers are specially trained and equipped to resolve issues affecting the road network and are a vital part of our activity to improve reliability and road safety in London.

For example, in Victoria, roadworks were identifed as causing congestion and the problem was being compounded by traffic light phasing so traffic built up. Officers worked with our control centre to review and change the phasing of the lights. In the meantime, officers directed traffic to keep the junction clear, allowing buses and coaches access to Vauxhall Bridge Road.

The officers work alongside other on-street enforcement officers and the police. Operation Zero Tolerance brings together RTEOs. Our Road Network Compliance Officers, Revenue Protection Inspectors and Police Community Support Officers to deal with issues contributing to delays, such as incorrect signs, coach parking, freight deliveries, traffic offences or parking contraventions. This operation is being expanded to cover more locations.

Appendix 1: Tables showing congestion trends and traffic flow averages in London

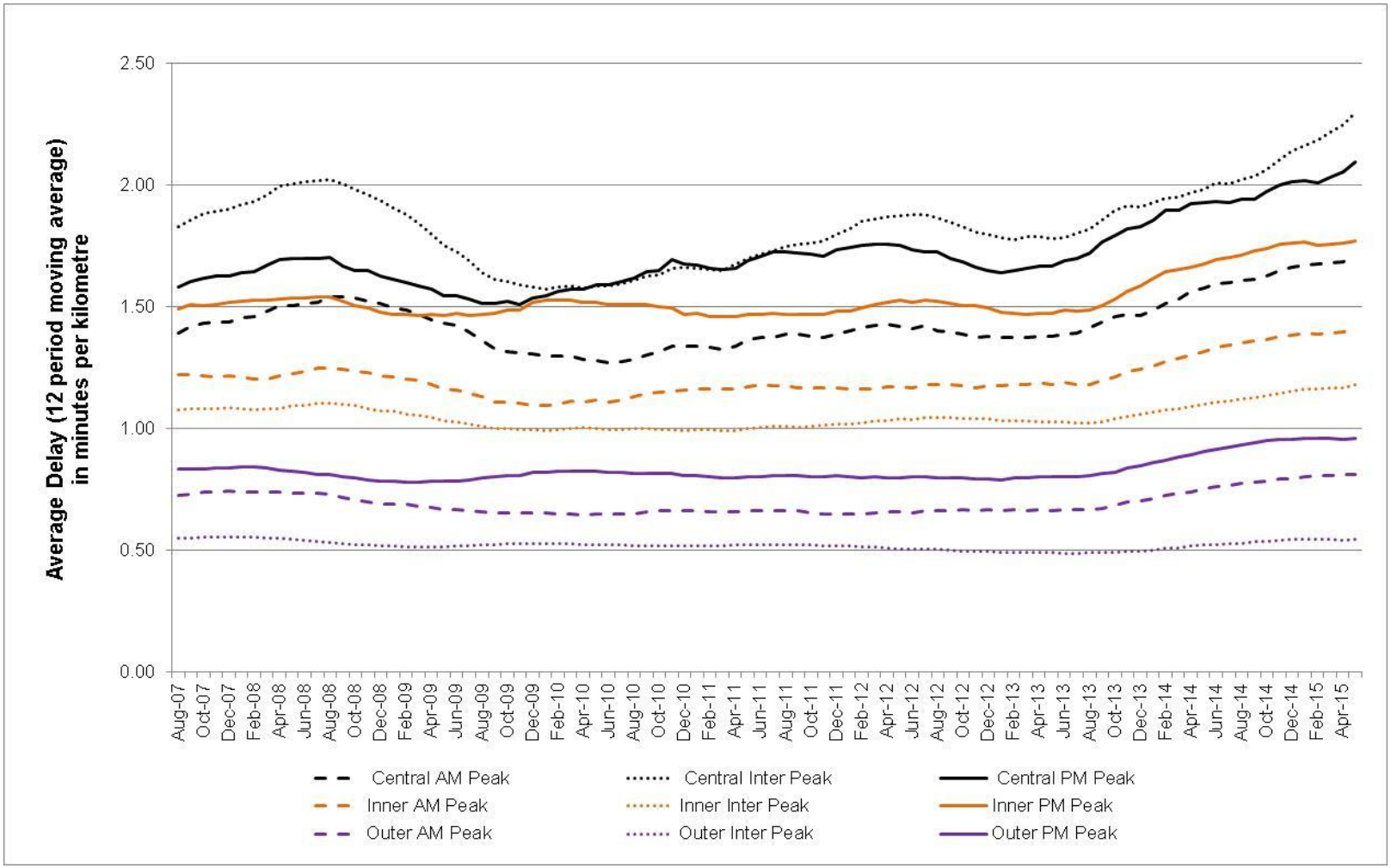

Figure 1 - Trend in congestion in London. Average values for 12-hour weekdays, by month as 12 month moving average in minutes per kilometre of excess delay. Data from moving car observer surveys.

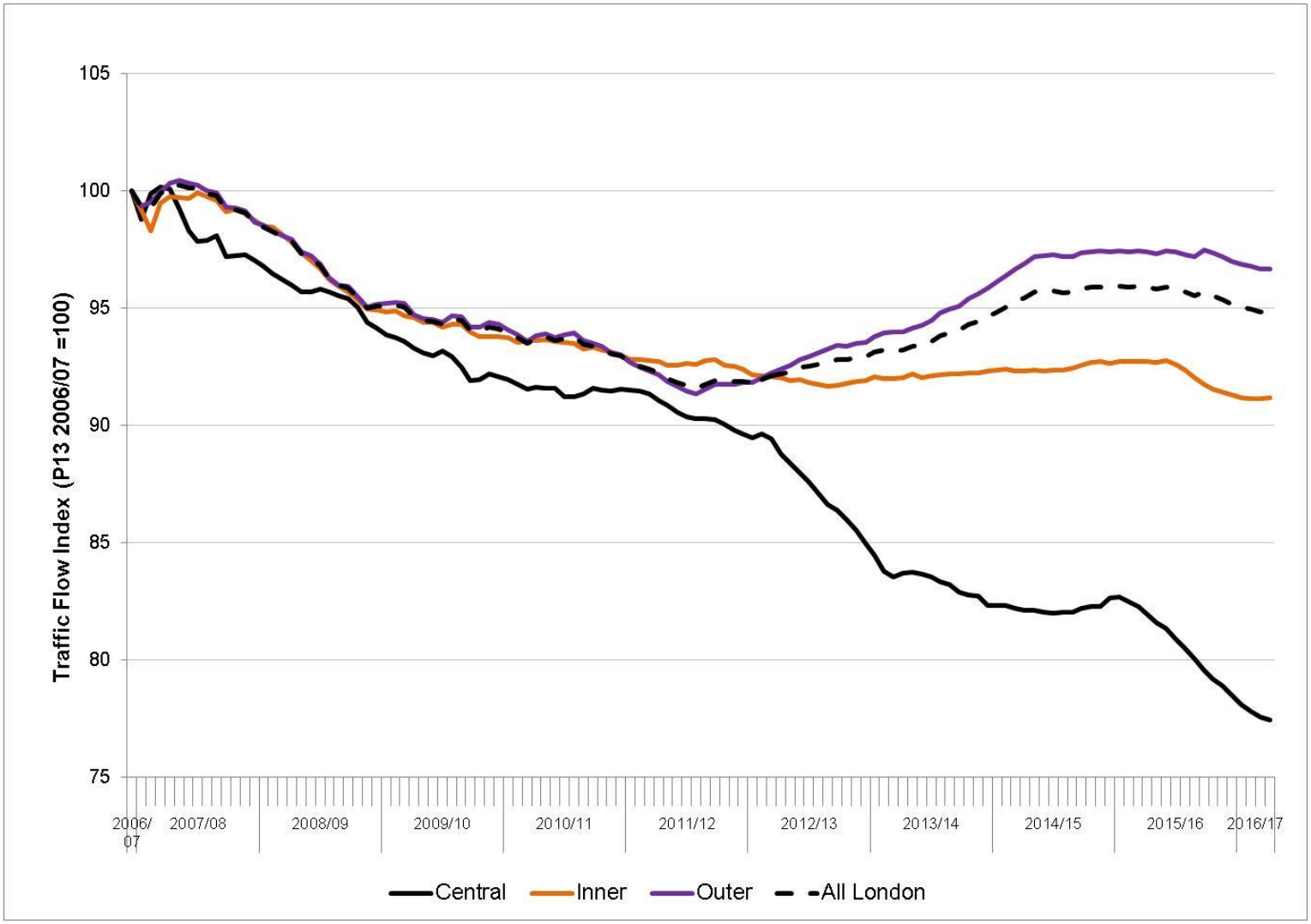

Figure 2 - London 24 Average Weekday Traffic Flow by Region (Central, inner and Outer) by period as 13 period moving averages (indexed to P13 20016/07 =100)

From: Cousens, Jack [redacted]
Sent: 01 September 2016 18:11
To: Georgina Wells
Subject: RE: London Assembly Transport Committee – Congestion Investigation – Call for Evidence

Good evening Georgina,

Please find below the response from the AA regarding the Traffic Congestion Investigation:

1) **How has traffic congestion in London changed in recent years? Are there differences in the amount, time, type and/or locations of congestion?**
Overall traffic congestion has got worse over previous years but there are differences between central, inner and outer London and these differences should be explored further. Our AA Populus results show that 66% of London motorists feel that congestion is the biggest issue on local roads*, compared to 61% in 2015**, and 31% in 2013***

2) **What are the key causes of these changes in congestion?**
It is widely accepted that; redevelopment programmes, roadworks & street works, ULEV, home delivery vehicles, minicabs and road space being allocated to other modes of transport (Cycle Super Highways) have contributed to an increase in traffic congestion in London

3) **What impact does congestion have on Londoners, the city's economy and its environment?**
Congestion has a negative impact on Londoners in terms of wasted hours and vehicle emissions. Congestion will have an impact in overground public transport (buses) which also impacts the city's economy and environment

4) **What can London learn from other cities in its effort to reduce congestion?**
Road tunnelling in Paris and Boston

5) **How effective is the Congestion Charge? How should this scheme be modified?**
Congestion Charge has had a minimal impact in reducing congestion in central London. However there has been little investment in infrastructure in conjunction with the CC to help tackle the problem. Road Tunnelling would offer a good alternative

6) **To what extent would a usage-based road pricing regime help reduce congestion?**
A usage-based road pricing regime will not help reduce congestion. People make journeys for a reason and it would be unfair to penalise them for doing so. Implementing a scheme such as this could increase congestion around edges of a zone where the fees don't apply/drastically differ

7) **How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?**
In the short term ULEZ may have a positive impact, however in the medium term ULEZ will have a marginal impact on congestion as people will simply swap an older vehicle for a new one. The main winner in this change would be the environmental impact would be improved

8) **What would be the benefits and drawbacks of these other interventions?**

- Tolling for river crossings or other major infrastructure Tolls will not act as a deterrent and not reduce congestion. It would be grossly unfair to charge people up to 4 times (CC, ULEZ, T

Charge and tolls) to enter London

- Workplace Parking Levy Unless there is a viable alternative a workplace parking levy will not have an impact. There needs to be an interface between driving and public transport at fringes (Park & ride). This could be seen as a tax on vital shift-workers i.e. nurses and firefighters who need to park at work

- Devolving Vehicle Excise Duty to London Vehicle Excise Duty should remain part of central government decision making to ensure a level playing field for all vehicles across the country. Unclear how the scheme would work: Devolved VED would have to be based on the postcode in which the registered keeper lives. For lease vehicles/contract hire the 'driver' won't appear as the registered keeper. So a vehicle that is on a driveway in Chelsea could be registered in Birmingham to a registered keeper (business) operating in Bristol

9) **How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?**
Local collection of packages to be linked with stations on the Tube network. Another alternative could impose punitive charges to delivery vehicles but this would mean they would simply change the vehicle type or push costs onto consumers. Consideration should be given to outer London distribution hubs

10) **To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?**
According to the Evening Standard licensed private hire drivers has grown from 59,000 in April 2010 to approximately 100,000 in March 2016. Consideration should be given to capping the number of private hire vehicles

11) **What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?**
Car clubs can marginally contribute to tackling congestion, but in reality they are only suitable for certain sections of the population. Families with young children cannot use car clubs with ease as they require the use of child seats. Often the people who use car clubs are not car owners so therefore doesn't reduce congestion

12) **To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?**
Live updates of bus arrival times across the whole network could help reduce congestion

13) **How can TfL further encourage a shift from private car use to public transport or active travel modes?**
A shift from private car use to public transport or active travel modes needs the introduction of; integrated ticketing, shared data across public transport modes, better terminal links between transport modes, integrated system of modelling transport, A TfL app with live data updates. Access to the public transport system needs to be looked at as a whole rather than individual segmentations with affordable tickets across all modes. The switch also needs to be a carrot approach rather than stick approach

14) **Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?**
Yes it can, especially through traffic. Urban tunnels and more river crossings could be of benefit to London

15) **To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?**
New roads can have a complimentary impact and help reduce congestion as there is the functionality to channel traffic onto more appropriate roads

16) **How should new road infrastructure be funded?**
This should be funded through the current budgets within TfL, Central Government awards and Highways England budgets

17) **How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?**
Lane rental has been a positive step in reducing congestion and works well in conjunction with the road works permit scheme. Its success is self-evident as the LGA want to implement a national rollout. However, where possible, dual utilities works should be encouraged to minimise additional impacts

18) **What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?**
It is too early to ascertain the full extent of the scheme as some of the infrastructure is less than 12 months old

19) **How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?**
More accurate and easily accessible live traffic and travel updates

20) **How effective has the Road and Transport Enforcement team been in tackling congestion?**
As their Road and Transport Enforcement team has been in place for less than 12 months it is still too early to tell how much of an impact they have had on reducing congestion

21) **AOB**
Breakdowns cause congestions and repairers can help alleviate their pressures. Breakdown companies need to retain exemption from the Congestion Charge in order to get into London, rescue road users and release the congestion

I hope this is of use to you, but should you have any questions please do not hesitate to contact me.

Kind regards,
Jack

Jack Cousens
Public Affairs Officer
[redacted]

The Alliance of British Drivers

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Tel: [redacted]
Web: www.abd.org.uk and www.freedomfordrivers.org

Greater London Assembly
Transport Committee

Via email: scrutiny@london.gov.uk (attention Richard Berry)

13 September 2016

Submission of Evidence to the Scrutiny on Traffic Congestion

Dear Mr Berry,

Below is a submission of evidence to the current scrutiny on traffic congestion in London. The Alliance of British Drivers (ABD) is a national organisation that represents the interests of motorists. I represent the interests of members in the London area and have very extensive experience over many years of traffic issues in London.

The information given below responds to the questions posed by the Committee.

1. How has traffic congestion changed in London in recent years?

It is undoubtedly the case that traffic congestion has been getting worse in the last few years. Of course historically London has been congested since the era of the horse and cart, and it tends to be self regulating - if it gets too bad then people stop travelling, use other means of transport or use alternative routes.

You give some figures in your note to the Committee on recent changes which in brief are:

> *- A reduction in traffic speed. On London's A-roads, average speed fell from 16.3mph in July 2013 to 14.8mph in July 2015.*
>
> *- Excess waiting times for buses have increased from an average of one minute in 2013/14 to 1.2 minutes in 2015/16*
>
> *- Journey time reliability on the TfL Road Network (major roads) has fallen from 89 per cent in 2013/14 to 87 per cent in 2015/16.*

Likewise TomTom reported earlier this year that congestion in London was 14% worse than five years ago (even though traffic congestion in the rest of Europe over that period was 3% down) and that the "added delay" over free flowing traffic conditions rose by 37% in 2014 alone!

2. What are the key causes of these changes in congestion?

There are a number of factors that are likely to have affected the level of congestion. These are:

a - Demand on road space driven by a larger number of vehicles which is partly driven by the increase in the population and economy of London (which of course have been growing rapidly due to previous mayoral policies). But it is also driven by the changes in the economy which affect vehicle types. So for example while private car usage has probably declined there have been large increases in private hire vehicles (PHVs) from services such as Uber, and also increases in light vans as the internet economy drives an increase in the need for delivery services.

Indeed trends in traffic and road usage are documented in the recently report published by TfL entitled "Travel in London - Report 8" - see http://content.tfl.gov.uk/travel-in-london-report-8.pdf .

For example in the period 2008-14, it reports *"In terms of travel by road, the absolute number of car trips has reduced by 1.0 per cent, compared to MTS [Mayors Transport Strategy] expectation of a 1.3 per cent increase, reflecting the strong shift in net mode share away from car travel in London."*

It is clear that the growth in population and business activity and the travel demand they generate has been mainly absorbed by increased public transport provision and usage plus to a limited extent more cycling and walking (which have been encouraged by rapidly rising public transport fares).

b - But as the aforementioned report says *"This reduction [in road travel] has, to some extent, facilitated the removal of available road network capacity for general traffic to pursue other priorities such as improved safety without, until the most recent year, adverse consequences for road network journey times and delays."*

We certainly believe that a lot of the causes of additional congestion in recent years have been caused by removal of road space and that includes the space taken up by Cycle Superhighways, cycle lanes, more pedestrian space which has removed road lanes, and reconfiguration of junctions.

The removal of some of the gyratory systems has been a major problem and although some changes might have been justified in the name of road safety and environmental improvements, the resulting outcome has often been very damaging. For example Trafalgar Square was on example of how a major road hub was damaged, and more recent examples are the Aldgate gyratory, Archway and of course the latest proposals for Bank junction in the City.

We believe a lot of the changes to the road network have been driven by dogma rather than sound cost/benefit analysis. A simple example was the unnecessary closure of Shorter Street in the City other than to buses/cyclists as part of the Cycle Superhighway works which has caused traffic diversion, extra loads on already congested routes and about which we have been making representations. There are many other examples of unjustified road closures in the last ten years.

3. What impact does congestion have on Londoners, the city's economy and the environment?

You have already answered some of these questions. There are direct costs in terms of the wasted time of road users and environmental costs in that congestion tends to create more air pollution (although the evaluation of that in monetary terms is difficult and the impacts on health are also difficult to estimate - but Londoners are in general seriously concerned about the level of air pollution).

High congestion also deters businesses from locating within London, deters tourists from visiting and makes London look an unattractive city to the world in which to do business or travel.

4. What can London learn from other cities in its effort to reduce congestion?

Not a lot in essence. London has implemented many of the initiatives used to tackle congestion such as bus priority, encouraging cycling, car and cycle hire schemes, road pricing, traffic light control, etc. But a lot of these techniques are ultimately ineffective.

Looking at other cities, it would appear that those less addicted to grandiose schemes but more to careful design of road networks (and reluctance to make changes unless there are clear cost/benefit advantages) are the most successful.

5. How effective is the Congestion Charge? How should the scheme be modified?

The Congestion Charge has been totally ineffective in reducing or controlling congestion. Indeed TfL have just decided to rename it a "Road User Charge" no doubt for that reason, although it really should be called a tax.

We looked at the impact of the Congestion Charge soon after it was introduced and published several notes based on subsequent reports published by TfL (they gave up doing so some years later). There are some notes that we published on our web site here: http://www.freedomfordrivers.org/Congestion.htm

There has been no congestion reduction from the congestion charge. Why is that? Probably because the demand for road space was so great that if you charge for it, those who are unwilling or cannot afford to pay the charge are simply replaced by those who can. In other words, it just introduces social discrimination in the use of the road space with the rich taking up space vacated by the poor.

In addition it has had no benefit in reducing air pollution.

It was also a poorly designed scheme, and very expensive to operate (most of the "tax collected" is wasted on administering the scheme). We suggest it should be scrapped rather than modified.

6. To what extent would a usage-based road pricing regime help reduce congestion?

It would not reduce congestion at all in our view. The ABD is consistently and vehemently opposed to road pricing and the general public have also demonstrated majority opposition.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

It seems very unlikely to us that these schemes will have any impact on congestion for the same reason that the Congestion Charge has failed. Namely that the demand for road space is so high that people will pay whatever is required, or others willing to pay or adopt other vehicles will get the benefit.

8. What would be the benefits and drawbacks of these other interventions: Tolling of river crossings, workplace parking levy, devolving vehicle excise duty to London?

In general we are opposed to tolls on river crossings, even when they are claimed to be used to finance new such developments. They are effectively a tax on travel. We can see no benefit in terms of traffic congestion reduction for the reasons give above.

A workplace parking levy is unlikely to have a significant impact as few commuters in London drive. Again it is likely just to be another tax that people are willing to pay because they have no alternative.

A devolved vehicle excise duty might be attractive to raise funds for TfL but it is unclear to us as to why London should be expected to have a different arrangement to any other city in the UK. In any case, a lot of the drivers within London come from outside the GLA area. Or to look at it another way, why should London registered drivers not fund roads in the country as a whole because they are likely to be driving outside London? Such suggestions just smack of desperation to us for more sources of funding for TfL when they are already highly funded but in essence inefficient in the use of their funds (as the current Mayor repeatedly said in his election campaign). Unfortunately the expenditure of money on schemes such as the Cycle Superhighways, 20 mph zones, Quietways, Cycle Hire, Trams, Emirates Cable Car, massive bus subsidies (by far the highest in the UK and even in the world) , the Freedom Pass and numerous other expensive schemes with few justified benefits has resulted in this expensive cost structure.

Proposals from the Mayor or TfL for road pricing or emission zone charging schemes seem to be motivated more by the needs to raise tax rather than anything else. It is money that is driving these proposals, not benefits to the road users or the general population as the cost/benefits of such schemes are rarely justified.

Indeed the traditional way to justify road schemes using a proper cost/benefit analysis has been thrown out of the window and public consultations are now done on such proposals without such an analysis being provided until very late in the day, if at all. This results in perverse outcomes as we have seen with the Cycle Superhighways.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how should this issue be addressed?

It does appear that the increase in PHVs may be contributing to congestion but it is difficult to separate out that impact from other changes that have contributed to congestion. We suggest there would need to be more specific evidence on this before any steps were taken to address the issue.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage them?

Car clubs have been around a long time now, with only limited take up. Increased numbers of car clubs might actually mean more vehicles on the road as they might be more actively used than privately owned vehicles. At best they might reduce parking demand but it is difficult to see how they would reduce congestion.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Buses can actually contribute to congestion as they are slow moving and stop more frequently. Indeed on some roads congestion and air pollution might be substantially reduced if there were fewer buses (Oxford Street is of course an extreme example). Where bus lanes are introduced to help the speed of bus journeys, they negatively contribute to congestion faced by other vehicles. We suggest all existing bus lanes should be reviewed and those that do not support the transport of more people per hour than would otherwise be transported if the lane was open to private cars and taxis should be removed.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

We see no need for such encouragement. Certainly the recent increase in congestion has not been caused by an increase in private car use (except perhaps to some extent in PHVs - but users of PHVs are unlikely to switch to public transport or cycling/walking). It would seem more rational to tackle congestion and its causes by other means.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Certainly new roads and increased road space would assist and should be considered. There need to be major improvements to both arterial routes and circular routes - for example the "Inner Ring Road" which is the boundary of the congestion charge zone but is a major route only in name (few improvements made to it), the North/South Circular where the South Circular in particular has minimal capacity over most of its length with little improvements made over many years,

and arterial roads on the west and south of London. There are also lots of minor junctions schemes that would assist with congestion.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

The reason for the existing congestion is because there is already high demand for the available road space and people willing to consume it even though they suffer delays. More road space may not affect those consumers, but it might encourage others to do so. However, as the usage of private vehicles (other than PHVs) seems to have stabilized in London, and vehicle ownership likewise reached a natural maximum in many boroughs, it seems unlikely to us that overall demand for road space would increase substantially.

16. How should new road infrastructure be funded?

We believe road infrastructure should primarily be funded out of national taxes, as at present. Road users actually pay a lot more in taxes (fuel duty, road tax, VAT, etc) than is spent on the road network. There is little justification for imposing additional taxes in a local area, even to fund specific schemes (and we include "charging" schemes in that).

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

They seem to be effective if complex to administer. We have not seen any reports on the cost versus effectiveness of these measures.

18. How can the use of technology be enhanced to help TfL manage congestion? For example, how can the iBus system be used for this purpose?

The iBus system tracks buses. It could presumably provide congestion information. However that is readily available from other sources available to TfL and from commercial providers of satnav products for car/van users.

It is of course not easy to divert buses to alternative routes at short notice without considerable inconvenience to passengers.

19. How effective has the Road and Transport Enforcement team been in tackling congestion?

One gets the impression that management of the network has improved over the past few years with TfL having more access to video cameras and traffic flow data. This has enabled them to identify problems more rapidly but whether any more benefits could be obtained by assigning more staff to response teams to deal with known problems is difficult to say.

A lot of the congestion is caused simply by too many vehicles for the available road capacity at particular times or on particular dates (particularly when there are special events or road closures taking place), so dealing with "hot spots" can often only deal with short term and minor difficulties.

Conclusion

In conclusion let me repeat what we said in response to the Roads Task Force Consultation in 2012 as the comments are still very much to the point:

"The prioritization of policies should be strictly based on economic criteria. All benefits can be reduced to economic value if an appropriate methodology is applied (although it is often done so in an incorrect manner for road safety projects or air pollution costs where a subjective assignment of "value" is commonly applied).

So new road construction, or traffic congestion reduction projects, should be based on the economic benefit that might result. Those with the most benefit should be considered first. But given that, there is clearly also a "network" benefit in having a joined up and co-ordinated road network, which we simply do not have at present. The financial benefit of having one should be studied as a first step in developing a plan for London's roads.

Obviously there are limitations to finance, but if the massive and unnecessary subsidy to buses was redirected then it might provide substantial funding. The Freedom Pass should likewise be reformed to reduce the unnecessary subsidy that it provides. It seems simply irrational to encourage bus users to travel, and hence to consume resources, emit pollutants from the vehicles they occupy and take up valuable road space, all at zero cost to themselves – this simply motivates people to use scarce resources without any thought to their cost at all.

The London Congestion Tax (aka "Charge") is also an enormous waste of resources which provides minimal financial benefit. We do not believe that the true costs of installing, managing and regulating this scheme have been taken into account. By simply scrapping it and devoting all the resources thereby applied to other matters, major benefits could be achieved. It is also a tax that bears more heavily on the poor than the wealthy, which is never a good principle to follow."

Note that we really do need to look at the proper development and protection of a strategic road network in London if we are to reduce congestion. At present the network gets repeatedly damaged by proposals put forward on grounds that are claimed to be of public benefit but which in practice have negative cost/benefits.

Part of the problem is the lack of expenditure by TfL on road improvement schemes, when they have funded many other projects some of which have contributed negatively to traffic congestion.

I would welcome the opportunity to speak to the Committee on this topic.

Yours sincerely

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FAO: Georgina Wells

Our ref: AJCF/ GLA/trf16

22nd August 2016

Dear Ms. Wells,

LONDON ASSEMBLY INVESTIGATION INTO TRAFFIC CONGESTION

Further to the request from Mr. Berry (of 1st August) seeking submissions on the topic of increased traffic congestion in London. Our business was established over 65 years ago and has extensive experience of the conditions in central London. The overwhelming majority of our operations are within the equivalent of underground 'Zone 1' and the contents of our submission reflect this. We operate a network of bus routes aimed at London's tourists, using open-top double deck buses. In accordance with the Mayoral Guidance we vary frequencies by season and avoid unnecessary journeys at times of lesser demand.

Attached hereto is an Appendix which is confidential and marked accordingly. This shows the performance/reliability statistics of our network in recent times and has been adjusted where necessary to ensure any effect of matters other than traffic conditions is not reflected. Overall, as can be seen the reliability rate has deteriorated notably since the start of May 2015 (commencement of CSH construction) with no material improvement since that time. It can be argued that central London's roads are now dysfunctional. Even at weekends there is now often no respite. Inevitably, to ameliorate the conditions and provide the same level of service to customers an operator (whether of buses, deliveries, taxis etc.) is likely to find it necessary to increase the vehicle allocation, in itself adding to the overall problem. It is now established that London's traffic congestion has become notorious and is discouraging visitors.

A. Cycle Superhighways (CSH)

It can be seen from the performance statistics that there has been a highly significant deterioration since the commencement of the East-West Cycle Superhighway at the end of April 2015. It should be noted that in preparation for the expected delays we took steps to shorten the routes where feasible and to adjust the running times in addition to the allocation of extra costly resources. Thus, the impact is actually even worse than it appears. There has been no material improvement since the conclusion of the majority of the works. Prior to the commencement of the works (other than in exceptional circumstances) average late running on a typical 2¼ hour cycle was 10 minutes on weekdays and zero at weekends. Since then, despite the aforementioned steps taken to ameliorate the impact the late running has averaged 65 minutes on weekdays and 25 minutes at weekends.

B. Major works

There has been a substantial increase in major works of late, in particular in – but not limited to – the Victoria area which suffers multiple overlapping schemes. Most of these impact upon the availability of road space and, irrespective of advance notice given, cause massive disruption in the first days of operation then 'settle down' to simply yet another lengthy delay.

C. Construction traffic

Linked to the factor above, but also in connection with the many building projects there is a very high and increased prevalence of construction traffic, e.g. cranes, cement mixers, delivery of materials (often unloading on the carriageway thus further reducing its availability).

D. Minicab proliferation

There has been a marked (and much-reported) explosion in the volume of private hire vehicles ("minicabs"). This includes during the daytime in central London where there is no obvious reason for an increased customer demand, thereby explaining those cars seen going 'around the block' multiple times as they are not permitted to ply for hire nor loiter on the streets. It is not clear as to how the enforcement of the Congestion Charge (for non-exempt PHVs) only when empty works in practice as it seemingly does not deter even though in most cases some of the journey is, by definition, empty of passengers.

E. London bus network

About eight years ago the decision was taken to keep peak time frequencies broadly continuing in the daytime inter-peak periods on all high frequency routes. Whilst further out from the centre on routes not entering Zone 1 this may well be commendable, it has resulted in a plethora of buses (and drivers on pay) between 10.30 and 15.30 in Zone 1 with extremely low load factors often running in cavalcades or overfilling bus stands. This impacts upon all traffic including, of course, the London bus network itself.

F. Coach parking facilities

These have been reduced over the years. TfL and CPT have both endeavoured to address the matter. Nevertheless, it is not uncommon for coaches to cause blockages whilst loading/unloading. Often the driver may have little choice although this is not necessarily the case. Coaches from outside the United Kingdom tend to exacerbate the situation, often by being (seemingly) unaware of regulations or what facilities do exist and, of course, usually having the added problem of a door on the 'wrong side' meaning passengers occupying part of the carriageway in order to access and egress the vehicle to their own risk and the detriment of traffic flows.

G. Delivery vehicles

The availability of loading bays has been reduced in some parts. This coincides with an increase in just-in-time deliveries for many businesses and a massive upsurge in personal deliveries (often to work addresses) because of on-line shopping. Inevitably, more vans competing for fewer spaces has impacted upon traffic flows.

H. Lack of 'joined-up' thinking

Schemes or works often clash or one displaces traffic into the hinterland of another. One such example is the closure of Tooley Street, SE1 for 22 months from May 2016. The works (by Network Rail) impact upon the westbound carriageway. However, westbound traffic has been re-routed onto the eastbound carriageway whilst eastbound traffic has to undertake a one-mile long diversion via Bricklayer's Arms. Ironically, there are closer adjacent alternatives (at least for the lighter vehicles) for westbound traffic but there are not any for eastbound. Yet the decision was taken to impede a large volume of traffic generally leaving the most-congested central area whilst not materially affecting the traffic flow into that congestion. This was exacerbated by the fact that many road users opted to use Tower Bridge instead and then join their desired route. Owing to the closure of Arthur Street and no left turn from Fish Street Hill more traffic uses Eastcheap. This and those wanting south-east London who decide to use Tower Bridge rather than the circuitous route via Bricklayer's Arms are all forced onto a reduced width part of Tower Hill. The recent changes to the Aldgate gyratory system mean there are now no means of getting from Fenchurch Street or Leadenhall Street to The Highway or Tower Bridge owing to a series of prohibited turns so no alternative is available to motorized traffic.

I. Events

There has been a significant increase in the number of events taking place on London's roads. These all displace traffic elsewhere or, for some essential journeys simply move it to another

day adding to that alternative day's congestion, sometimes compounded by multiple events in close proximity on the same day with no overall means of coping with the effect. Furthermore, many demonstrations, parades etc. are now in the control of stewards instead of the police. The time taken to re-open roads after such events is increasing for no obvious purpose or benefit. Questions asked usually elicit (if anything) the response that there are insufficient staff to meet the anticipated time of re-opening or, more often, that no-one knows what is happening nor why. Some means of charging 'lane rental' similar to applied to utility repairs ought to be activated to ensure the organiser of all such events pays for sufficient staff and a co-ordinator of the right experience and quality.

I trust that the comments made in this submission may assist you in the essential nature of your investigation. Please do not hesitate to contact me if you need any further information. In that respect I add that I and my key managers would be delighted to assist in your investigation in any way.

Yours sincerely

A. J. C. Fraser **CMILT, Chartered MCIPD, MInstTA**
Operations Director

LONDON ASSEMBLY – INVESTIGATION INTO TRAFFIC CONGESTION IN LONDON – RESPONSE BY THE TRANSPORT PLANNING SOCIETY (TPS)

The Transport Planning Society (TPS) is an independent institutional body in the UK, established to facilitate, develop and promote best practice in transport planning and to provide a focus for dialogue between practitioners and others interested in the field. It is supported by four long established professional institutions –ICE, CIHT, CILT and RTPI -all of whom have an interest in transport planning as well as their own core activities.

The Transport Planning Society administers its own Professional Development Scheme for transport planners, leading to award of the Transport Planning Professional (TPP) qualification which is the only professional qualification uniquely aimed at transport planners. The Society has over1200 individual members and 30 corporate member providers of transport planning services in the UK and elsewhere.

Our response (set out below in italics) has been drafted by the Policy Group within the TPS Board, all of whom were elected by the membership as a whole. The Policy Group is in constant dialogue with other members of the Society and the views expressed here may be taken as broadly representative of them.

Our response to the General Questions (1 to 4)

The most comprehensive source of detailed traffic monitoring is available directly from TfL. These data measure traffic composition by time, vehicle type and area. A more detailed monitoring regime is now required in order to gauge the impacts of emerging trends including post development multi-modal surveys, vehicle transmission types, taxi/minicab mix, emission types, street parking and loading intensities by vehicle and street type. This expanded range of monitoring should assist in informing the causes of traffic change hence providing the answers to your key general question.

Traffic congestion causes serious damage to both the local economy and environment. In parts of London the road networks are regularly subject to near-gridlock conditions and others to occasional breakdown because of their critical or limited nature. Growth in population and employment beyond the Central Area will have a disproportionate impact on traffic congestion as public transport is weaker and few improvements in road capacity and management are likely. London can still learn from other cities particularly with regard to bus rapid transit, light rail/tram project funding, selective provision of limited geometry road grade separation at congestion hotspots to enable improved conditions for buses, pedestrians and cyclists road pricing, parking management and integrated land-use and transport planning.

Question 5. How effective is the Congestion Charge? How should this scheme be modified?

Reasonably efficient as a demand management device in reducing congestion in Central London but far too beneficial to local residents and exempt vehicles. This is a "blunt instrument" in road pricing terms and warrants a mileage charging refinement. Strong leadership from the London Assembly and the Mayor would be needed to

extend the area and careful consideration of alternatives (via parking levies and emission charging) needs to be followed through.

Question 6. To what extent would a usage-based road pricing regime help to reduce congestion?

Usage-based road pricing would be far more effective in managing demand and very much more equitable. The ROCOL studies undertaken prior to the establishment of the GLA are worth re-reading.

Question 7. How might the Ultra-Low Emissions Surcharge affect congestion levels?

This surcharge can only really encourage the vehicle fleet to change to lower emission transmission over time. It may have some shorter term impact on traffic levels and congestion but this would be eroded soon enough. In defining a physical boundary for any ULEV scheme such as the South Circular Road there could be the undesirable and unintended consequences of focusing harmful pollution levels onto a road like the South Circular which is in effect a poorly connected set of local high streets.

Question 8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure
- Workplace Parking Levy
- Devolving Vehicle Excise Duty to London

Tolling river crossings would be effective in cases where new capacity is added and where there is a need to enable local economies to benefit by means of differential pricing designed to deter non-local trips. There is still a case for applying premium charges on such bridge crossings or indeed on any new significant capacity increase if a more comprehensive form of road pricing is introduced.

We strongly commend the application of a Parking Levy across the whole of London. This would need to address the entire parking market rather than simply focus on the workplace as in Nottingham and under consideration in Oxford, Cambridge and a number of other cities. This instrument would help to manage traffic and parking demand as well as raise funds for local transport and environmental improvements. It is capable of being applied in a price-sensitive way and hence avoiding potentially damaging environmental and market boundary distortions. Every parking space other than off street private residential parking would pay a relatively low and graduated levy so that no particular sector is facing all the impact of the levy.

Capturing the Treasury VED would be most helpful provided it becomes additional money. We do not anticipate the Treasury to make this available without stringent conditions if at all.

Question 9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Apply more of the measures adopted during London 2012. Other vehicles servicing London's needs are also growing at a high rate and already cause disproportionate delays when "parked".

Question 10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Apply more comprehensive and extended road pricing.

Question 11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

A very small contribution is likely in the short term. To the extent that they reduce car ownership, that takes pressure off on-street parking areas and should reduce trip making by car. To the extent that non-car owners users may be attracted to using Car Club vehicles rather than public transport, that could have an adverse effect on congestion. More research is needed of the ways in which Car Clubs are used.

Either way, refined and consistent pan-London policies are needed but these must be flexible enough to deal with the changing car ownership trends. The roll-out of the first autonomous cars is no longer a pipe-dream.

Question 12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

Some efficiencies and certainly reduced congestion should arise if London's town centre stations and other bus stations/hubs were better located to avoid dead mileage and over-bussing congested central roads.

Several issues need to be addressed. Bus journey times are currently increasing in London with a deterrent effect on passenger growth. Bus-on-bus congestion is becoming more prevalent on busy routes and around bus hubs, and this requires a review of the relevant operations and stop locations. Secondly, better provision needs to be made for buses in junction remodelling schemes, where bus journey times are often extended due to longer routeings through the junction, more traffic signal stops, slow speeds round low radius turns, and the need for difficult manoeuvres to access stops. Thirdly, in certain areas, bus speeds are being affected by the blanket introduction of 20 mph speed limits and the imposition of such limits on bus routes should be reviewed.

Question 13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

Apply a multi-pronged approach by employing a combination of London 2012 measures and road pricing with a parking levy. Invest further in strategic cycling measures, and take steps to make bus travel more attractive.

Question 14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

It can reduce congestion particularly if supplemented with management measures such as re-allocating capacity and applying charges. There are numerous congestion black spots in the Capital where the environment and public safety is seriously compromised by gross congestion. Such locations are often in heavily populated areas where pedestrian, cycling and bus provision is woeful and where space for physical change is limited or expensive. These are potential locations for imaginative designs for limited facilities that grade-separate major traffic flows from pedestrian, cyclists and buses without adding capacity for general traffic. Good practice exists in Continental cites and particularly in France.

Many of London's town centres already exhibit serious congestion and this is likely to worsen given the demands of growth. A good example of achieving benefit from road investment in London would be the tunnelling of the A4 route beneath the Hammersmith town centre and gyratory. A balanced contribution of both public transport and road improvements will be necessary where there is feasible and acceptable.

Question 15. To what extent is there a risk of new roads encouraging people to drive? How can this risk be avoided?

There is obviously a risk here but it would be minimised if complementary measures as described above are implemented in parallel.

Question 16. How should road infrastructure be funded?

By a combination of TfL capital funding, new monies raised from road pricing, parking levies and tolls and developer obligations. Most road investment in London would yield benefits for bus operations. A CIL could also be employed.

Question 17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

This is difficult to test and we suspect major works are well managed whereas minor ones are left in place too long and are less well co-ordinated. The price mechanism should be employed to a greater extent.

Question 18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

Major works in Central London are always high profile and the effect on congestion has been well documented. Detailed monitoring has no doubt revealed more results. The longer term effects are as yet unknown.

Question 19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBUS system be used for this purpose?

The introduction of an operator/user continuous real-time performance feed (app) of service offer and condition is needed.

What is needed is an app which recommends the best route by bus given current, not scheduled, journey times.

Question 20. How effective has the Road and Transport Enforcement team been in tackling congestion?

We have difficulty in answering this question but would expect some benefit at least as a residual from the London 2012 practice and experience where the relevant agencies were obliged to work together. We have not seen any research evaluating the effects of the Team. What is needed is some modelling of the situation that would have prevailed without the Team's interventions, with outcomes compared with what actually occurred on the day.

UBER

Investigation into traffic congestion in London - Uber submission

Congestion is a serious problem for cities, and London is no exception. We welcome the Transport Committee's investigation into what can be done to reduce it.

Controlling congestion is complex, and poorly-targeted interventions without a thorough impact assessment can be counter-productive. Any solutions should be evidence-based with a clear understanding of what precise behaviour change is desired and which instruments are best suited to target it. A first step must be a rigorous analysis of the current level and causes of congestion.

There is a lack of detailed data on the issue in London. Uber commissioned a report from INRIX[1] to facilitate this debate and welcome further research that TfL may wish to undertake or commission.

TfL should also explore the use of new technology and services to alleviate congestion. These include:

- Conducting a feasibility study of how private hire vehicle (PHV) and taxi use can complement public transport in Outer London to move journeys away from private cars and thus decrease congestion in the centre.
- Dedicated pick-up and drop-off points at outlying tube and train stations to make 'first and last mile' connections easier and their availability more prominent.
- Targeted grants aimed at the disabled community - and distributed through leading charities and employers - to take advantage of PHV and taxi services designed for the community.
- A seniors pilot scheme aimed at increasing access to community hubs for those with mobility challenges[2].

Innovative cities around the world have begun to test new ideas like the above. We would be happy to co-operate with TfL to ensure that London leads the world in maximising the public benefits of new technology.

We have answered questions where appropriate. Otherwise we have entered 'N/A'.

[1] In May 2016, INRIX, a global leader in measuring and understanding congestion in cities around the world, published a report commissioned by Uber on congestion in London.
[2] Uber and Fulton County in Georgia

General questions

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

The limited information that is available suggests the amount, time, type and location of congestion in London has changed in recent years. A recent report from INRIX, based on data from TfL, the Department for Transport (DfT), the Office for National Statistics (ONS), the Automobile Association (AA), Uber and INRIX, noted the following:

- Congestion in London rose noticeably between 2012-15, with journey times in Central London increasing by 12% annually during that period, with most of that increase in the two years 2014-2015.
- Congestion has increased across all daylight hours - not just peak hours - in Central and Outer London.
- Roadway travel demand, as seen in vehicle counts, is flat or decreasing in Central London and increasing only slightly in Outer London. The increased use of other modes of transport may explain why roadway traffic volumes remain flat.
- Car traffic, including taxis and PHVs, is decreasing in Central London and the Congestion Charge Zone.
- Light goods vehicle (LGV) traffic is increasing in Central London, possibly related to the rise in online commerce. This is the only vehicle type to show more roadway volume in all three zones of London.

New national data[3] from DfT is consistent, noting that all road traffic is increasing across Great Britain, with LGVs and heavy goods vehicles (HGVs) by far the biggest risers. Indeed, LGV traffic across the country has increased by 70% in the past 20 years - compared to just 12% for cars.

2. What are the key causes of these changes in congestion?

Increased congestion has been caused by a combination of planned roadworks and a rise in delivery journeys. As the INRIX report found, the main factors are:

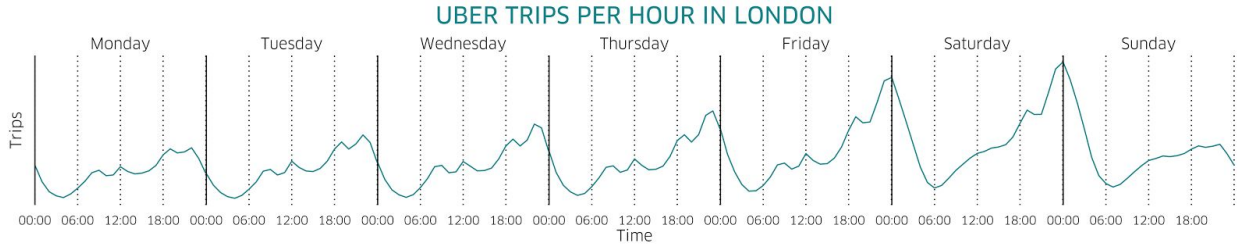
- The almost fourfold rise - a 362% increase[4] - in planned roadworks from 2012-15, due partly to Crossrail and the growth of Cycle Superhighways.
- A significant increase in LGV traffic from 2012-15, driven by the surge in online commerce and related demand for deliveries to the home and workplace. This highlights the impact that behavioural change in an unrelated sphere - personal shopping - can have on a city's transport network, so challenging policy makers to predict the next 'external' trends to impact congestion.

Although overall journey times increased by 12% per annum, car traffic - including taxis and PHVs - decreased in central London and the Congestion Charge Zone during the study period and so did not increase congestion in these areas. PHVs, in particular, are highly unlikely to contribute meaningfully towards congestion since they are most active at times of low congestion, such as weekends and late at night when public transport options are more limited or unavailable.

This is especially the case for Uber, as INRIX concludes 'there is a generally inverse relationship between primary Uber usage times and congestion peak periods. Only 31.8% of Uber travel occurs from 7am to 6pm,

[3] Provisional Road Traffic Estimates Great Britain: July 2015 - June 2016
[4] We recognise this increase was exacerbated by roadwork delays due to the London Olympics.

with 23% of all Uber trips occurring between midnight and 5am'. As this chart of Uber's usage profile shows, our service is most popular at night on Friday and Saturday, and throughout the rest of the week demand peaks during later hours when congestion is lower.



Services like Uber may also be discouraging private car ownership and usage, as explained in our response to Question 10.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Congestion can slow economic growth, diminish quality of life and reduce mobility for Londoners.

In a joint study[5], INRIX and the Centre for Economics and Business Research predicted that the amount of time London drivers spent idling in traffic would rise from 250 hours in 2013 to 299 hours in 2030, equivalent to 40 working days per year. The associated economic impact was estimated as follows:

- 2013-2030 cost of congestion to London:
    - £130bn in total
    - total annual increase of 71% (£5.4bn in 2013; £9.3bn in 2030)
    - household annual increase of 44% (£2,765 in 2013; £4,002 in 2030)

Cities succeed when the businesses and communities within them work together to be more than the sum of their parts. This agglomeration and clustering is core to economic growth, and relies on effective communication and transport infrastructures. High levels of congestion risk undermining exactly what it is that makes a city successful. This is particularly the case for London which has a relatively low population density compared to international rivals, such that the physical distances that need to be travelled are relatively large.

Other examples of the negative impact of congestion include:

- Increasing the time and stress of attending meetings, conferences and other opportunities, so limiting the exchange of ideas and relationship-building integral to a city's commercial success.
- Restricting viable, value-for-money transport options, as road-based travel becomes more time-consuming and less safe - especially for the growing community of London cyclist-commuters.
- Increasing the strain on London's housing market, as a rise in congestion is used as an argument to oppose housing developments, at a time when the Mayor is prioritising affordable housing.

4. What can London learn from other cities in its effort to reduce congestion?

[5] INRIX and CEBR study

Understanding the causes of congestion

Before acting on congestion, a city must understand its causes[6], yet studying and understanding congestion is a challenge. At a minimum, it requires granular information on road speeds by time of day to correctly begin to diagnose the location and time of any problems. Not all cities have access to this type of data or know how to interpret it. In London, for example, congestion is widely recognised as a problem but policy makers lack the detailed data required for evidence-based solutions. We welcome this Committee's attempt to address that.

Jumping to proposed remedies without detailed analysis is fraught with difficulty. In New York last year, Mayor de Blasio proposed a cap on 'for-hire vehicles' (FHVs), believing that their growth was a key factor in the city's congestion. Yet in seeking an evidence base to support that position, it became clear that such a cap was not the answer. The City of New York commissioned a study[7] on the impact of FHVs, concluding that:

- The main reasons for vehicle slowdowns in Manhattan were increased freight delivery, construction activity, and population growth.
- Any trips which Uber completes at congested times and locations are transferred from taxis or other surface modes, and are not newly generated trips that would increase congestion.

The data found that FHVs were not a material contributor to congestion in central Manhattan during congested weekday hours. However, they were providing an important service in other parts of the city and at other times of day e.g. in the outer boroughs, on the weekends, and late at night. The total market for transport has increased because Uber has been able to serve a previously underserved market.

This highlighted how a supply cap was not an appropriate solution to a perceived congestion issue - it would have prevented these trips from happening while failing to address the causes of congestion. The proposal was not taken forward, with the view that data - not assertions - should inform policy decisions.

Working with partners

To reduce congestion, London should take an innovative approach to working with partners who can help make it happen. In the US, large public transport operators are partnering with Uber to provide better access to public transport and ease congestion, be it for particular events or over extended periods. For example:

- In California, during Superbowl week Caltrain partnered with Uber to extend the reach of uberPOOL beyond San Francisco - where the service is normally limited to in the area - making it available to a much larger population along the train operator's route. The POOLtrain allowed train passengers to share their rides when heading to or from a Caltrain station, helping to get more people into fewer cars.
- In Florida, Uber and the Pinellas Suncoast Transit Agency (PSTA) have been working together to increase the use of public transport, jointly subsidising Uber fares to and from bus stops to solve the 'first and last mile' problem in the county.

[6] Data-driven studies such as the INRIX report - rather than literature reviews e.g. Professor David Begg's on *The Impact Of Congestion On Bus Passengers* - should inform policy decisions.
[7] For Hire Vehicle Transportation Study

- In Pennsylvania, Uber and the Southeastern Pennsylvania Transportation Authority (SEPTA) are partnering to increase access to the transport system throughout the region. During the pilot phase, discounted Uber rides are being made available to and from 11 of SEPTA's busiest stations to help bridge the 'first and last mile' gap, and reduce demand for parking spaces.

We could explore piloting a scheme similar to the POOLtrain on a major route outside of London that extends beyond the current uberPOOL boundary. More broadly, we would like to co-operate with TfL in conducting a feasibility study of how taxi and PHV use can complement public transport in Outer London to decrease congestion in the centre.

Charging for road pricing

5. How effective is the Congestion Charge? How should this scheme be modified?

We understand the Congestion Charge has helped to reduce the number of vehicles in the Congestion Charge Zone, contributing to 'an overall reduction in vehicle kilometres in London of 11 per cent between 2000 and 2012'[8]. Yet the TfL Impact Assessment adds that 'while traffic volumes have been falling within London, traffic speeds have also been getting progressively slower over the past decade; this is particularly the case in central London'.

One reason may be that the charge itself sends a relatively blunt and simplistic pricing signal: once a vehicle is inside the Zone, there is no price signal to reduce road usage 'at the margin'. Such a scheme may struggle to target the main causes of London congestion, as identified in the INRIX study. Indeed, once a vehicle has paid the charge it may have an incentive to conduct additional journeys within the Zone to justify the expenditure - journeys that may not have been done otherwise.

Since congestion - and the related detriment to Londoners - is non-linear with traffic levels, the scheme could be modified to send peak-smoothing pricing signals which incentivise travel outside peak commuting hours.

In terms of improving information flows to travellers, particularly around roadworks or traffic accidents, the scheme could be modified to send more sophisticated locational signals in real-time, to deter travel on particular corridors that are experiencing high levels of congestion.

6. To what extent would a usage-based road pricing regime help reduce congestion?

Turning the current flat daily charge into a 'per mile' charge (or a two-part tariff, with a daily and a per mile component) would be a more nuanced, complex approach to charging for use of the road. Before making any change to the pricing regime, it is crucial that TfL carries out a detailed assessment of charging options to determine which pricing structure has the greatest effect on driver behaviour (based on the evidence it collects). Uber would be happy to happy to co-operate with TfL on such an assessment.

TfL would also need to consider the financial impact of any such changes. Indeed, they may require lower tech operators like private cars and taxis to make significant investments to comply with the new rules.

[8] TfL Congestion Charge Impact Assessment

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

We support the introduction of both the Ultra Low Emission Zone (ULEZ) and Emissions Surcharge. It is right that the most polluting vehicles are discouraged from entering Central London[9].

Yet this may not materially cut congestion in the long term, given the effect of substitution to greener vehicles. The impact of the ULEZ and Emissions Surcharge on congestion is likely to be greatest in the first few months from introduction as this is when the highest number of vehicles are likely to be below the required standard. As time passes, vehicles will gradually become marginally less polluting and so be able to travel in the ULEZ without paying a fee.

Despite expected reductions in emissions, the introduction of the ULEZ will fail to lower congestion because it will do little to encourage greater numbers of people to share vehicles or share their journey through Central London - the fastest and easiest way of reducing overall congestion.

8. What would be the benefits and drawbacks of these other interventions?

We do not believe ULEZ regulation will have a significant lasting impact on congestion, although it should raise the issue's profile and spark further debate about how cities like London can use innovative transport solutions to overcome the big challenges of the future, such as poor air quality and congestion.

Measures to target specific types of vehicle

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

N/A.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Licensed PHVs are not a long-term driver of increased congestion - they have a role in tackling it.

[9] As part of our commitment to improving air quality, we have announced a new partnership with car manufacturers BYD and Nissan that will see more than 50 fully electric cars available on the Uber app in London by the end of September. A three-month study into Uber's electric vehicles programme will be conducted by the Energy Saving Trust (EST) to explore the feasibility of running large numbers of electric PHVs in the UK. In particular, the EST will research the experience, driving patterns and economics of private hire drivers using electric cars, and the capacity of London's current network of charging points to support these vehicles. If the programme is successful, we expect to have hundreds of fully electric vehicles on our app next year.

PHVs are most active at times of low congestion, such as weekends and late at night. This is especially so with Uber, as INRIX[10] showed 'there is a generally inverse relationship between primary Uber usage times and congestion peak periods. Only 31.8% of Uber travel occurs from 7am to 6pm, with 23% of all Uber trips occurring between midnight and 5am…[and] only 5.9% of all Uber trips are in the Congestion Charge Zone during charging hours'.

To the extent that New York can serve as a guide, as cited in question 4[11], any trips which Uber completes in that city during congested time periods and locations are largely transferred from other car modes, and are not newly generated trips that would increase congestion.

The possibility of large numbers of PHVs being shared by multiple passengers travelling in the same direction - through licensed car pooling services like uberPOOL - can help to reduce congestion. Since uberPOOL launched in London last December, there have been over two million trips in the city, with shared journeys saving more than 1.3 million miles driven, 98,000 litres of petrol and 231 metric tonnes of CO2. In San Francisco, around 50% of all journeys through Uber are made using uberPOOL and the service has become an important part of the transport ecosystem. If that level of success were replicated in London - and if policy makers would support mass adoption of car pooling services - congestion and associated poor air quality could be reduced. This is our goal with uberPOOL in London and we continue to see increasing uptake of the service.

Services like Uber may also be discouraging private car ownership and usage. In a recent opinion poll[12] of Uber passengers conducted by Research Interactive, 7% of respondents said they will drive their car less often, 5% decided not to buy a car at all, and 2% got rid of their car, all because of the Uber service. The benefits of reduced car ownership are twofold. First, there are likely to be journeys that would have been taken by car but are now via public transport. Second, there will be reduced pressure on car parking spaces.

11. *What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?*

Car clubs are another example of the emerging mix of complementary transport options making it easier for individuals to give up their own vehicles. Like Uber, they can be an attractive alternative to owning a private car - not only as a cost-effective, flexible and convenient means of getting from A to B without the hassle of repairs and servicing, but also as a way to tackle congestion. According to the Carplus annual survey[13] for 2014-15:

- For each car club vehicle, 8.6 cars have been removed from the road as a result of members who have sold a car - that is 20,150 private cars off London's streets.
- Almost a third of members reported they would have bought a private car if they had not joined a car club - a deferred purchase of a further 46,500 cars.
- Only 20% of long-term members own a car, compared to almost half doing so before joining a car club.
- The annual average mileage driven by new members after joining a car club was 2,190 miles - 37% less than before joining.

[10] INRIX report
[11] For Hire Vehicle Transportation Study
[12] Research Interactive poll of 800 Uber passengers, 25 March-14 April 2016
[13] Carplus Annual Survey 2014-15

In taking private cars off the road and reducing the need for parking spaces, we support not only car clubs but the broader concept of shared vehicle usage, as demonstrated by our shared service uberPOOL, which works to get more people into fewer cars. Indeed, a survey of 4,500 people[14] across the US confirmed that people who routinely use shared modes of transport (e.g. bike-sharing, car-sharing, and ride-sharing) were more likely to use public transport. These individuals were less likely to drive, more likely to walk, and saved more on overall transportation costs.

Over the long term, we believe ride-sharing has a major role to play in tackling congestion globally. uberCOMMUTE in Chicago and uberGo in India are products we have piloted to connect commuters on their daily drives with passengers heading the same way. Private car owners can select the pooling option on the Uber app and they are paired with another passenger or fellow commuter who is travelling in a similar direction[15].

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

In areas with public transport that is well used and moves on dedicated infrastructure, that infrastructure is the most efficient way to move people quickly and at scale around the urban centre. Yet a common issue for parts of such systems, e.g. isolated tube and train stations in Greater London, or commuter rail networks in American cities, is bridging the 'first or last mile' from passengers' homes to that station. By complementing these existing options and making that connection easier, Uber can encourage car commuters to switch modes and ease the strain on road infrastructure, thereby reducing congestion. Examples of such complementary transport options are provided in our response to Question 4.

Increased passenger numbers and lower average costs enable providers to offer improved service levels (e.g. more routes and higher frequencies) and lower fares. Improved services and reduced fares stimulate further shifts from car travel to public transport, resulting in additional reductions in congestion and gains to public transport and the wider city.

[14] Shared Mobility and the Transformation of Public Transport

[15] Where such products are available, those registering on our platform must pass a screening process before they are onboarded, and - as with the regular Uber experience - a range of safety features are available to passengers before, during and after every trip.

Encouraging modal shift

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

As the Transport Committee's *Future Proof* report[16] acknowledged, public transport provides the only way to meet daily needs at scale. Yet this approach can overlook the individuals and households that live beyond a reasonable walking distance to their local bus stop or train station.

There is an opportunity for TfL to experiment in overcoming the barriers to connect people with the public transport system, especially given that more than a million people in the capital drive to work each day[17]. Options include:

- A 'first and last mile' subsidised service aimed at filling in the gaps in areas identified as transport 'not-spots'.[18]
- Dedicated pick-up and drop-off points at outlying tube and train stations to make 'first and last mile' connections easier and their availability more prominent.
- Targeted grants aimed at the disabled community - and distributed through leading charities and employers - to take advantage of uberWAV and ASSIST.
- A seniors pilot scheme aimed at increasing access to community hubs for those with mobility difficulties.[19]

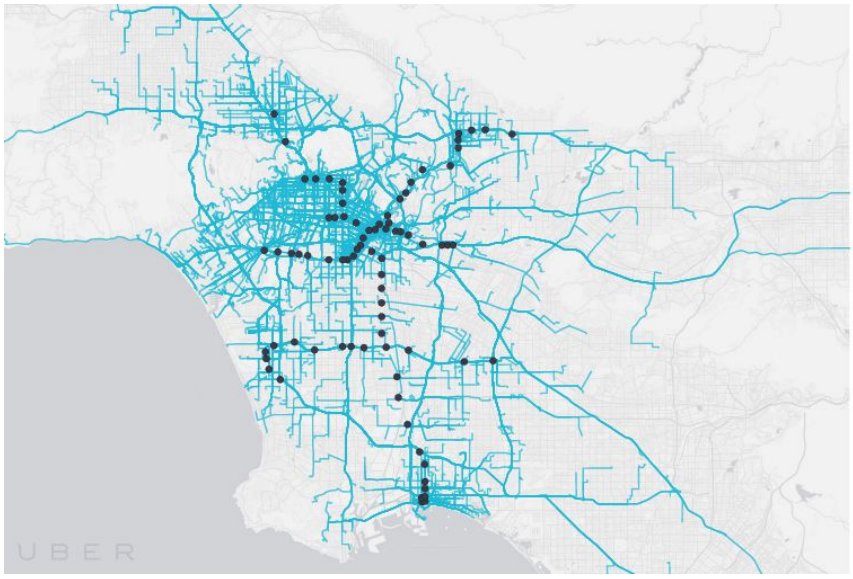
A recent study[20] conducted for the American Public Transportation Association (APTA) by the Shared-Use Mobility Center (SUMC) found that the more people use shared modes such as uberPOOL or car clubs, the more likely they are to use public transport, own fewer cars, and spend less on transport overall. Similar analysis in the UK would be helpful to better understand such behaviour and how it can be encouraged.

Uber would like to co-operate with TfL in conducting or designing feasibility studies of these options in London.

Los Angeles case study

In car-centric Los Angeles, a combination of LA Metro and Uber data[21] shows that many passengers are not just using the accessibility of Uber to replace their own vehicle, but to complete the first or last mile of a longer journey. By literally picking up where mass transit leaves off, Uber is extending the reach of LA public transport. The map below shows Uber trips that began or ended near Metro stations in the city.

[16] GLA Future Proof
[17] RAC Foundation's Car and the Commute report
[18] Uber and Pinellas County in Florida
[19] Uber and Fulton County in Georgia
[20] Shared Mobility and the Transformation of Public Transport
[21] Uber complements public transport in Los Angeles



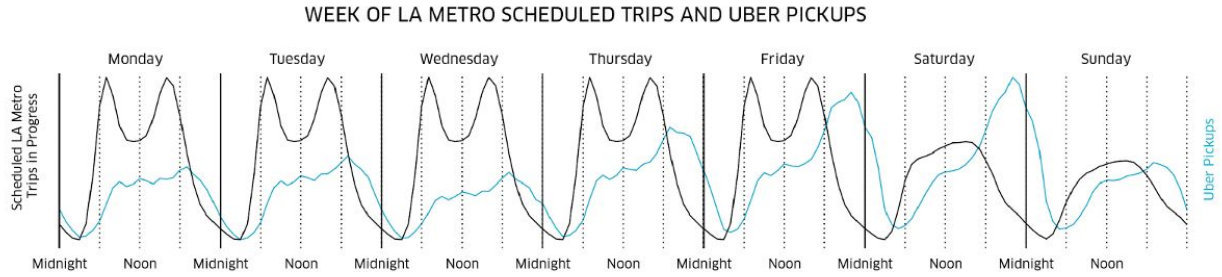
UBER COMPLEMENTS PUBLIC TRANSPORTATION IN LOS ANGELES

Lines represent Uber trips that began or ended within 1/8 mile of a Metro station in Los Angeles.

- METRO STATION
- UBER TRIPS

Data from the city of Los Angeles between December 1st and 8th, 2015. Completed trips only. Points have been jittered for privacy. Actual trip routes have been replaced by routes generated using an open source routing process.

As is the case in London (see question 2), the following chart shows that during off-peak hours in LA - when public transport is closed or less accessible - services like Uber step in to fill the gaps.



This example shows that by making it easier and faster to get around the city and its surrounding areas without the need to drive, Uber can complement public transport in helping to reduce people's dependence on cars. As for London, 38% of Uber trips start or end within 200 metres of a train station or tube stop, helping extend public transport networks to complete the 'first and last mile', and 20% of Uber trips in London start or end in an area underserved by public transport (i.e. more than half a mile away from public transport stations outside Zones 1 and 2).

More broadly, the above can only be achieved at scale in the UK with regulation that enables innovation and flexible working. Excessively onerous barriers to entry to driving on platforms such as Uber - be that for five or 45 hours per week - could limit TfL's ability to shift people away from private cars to a transport ecosystem that can help make the most of the public transport network.

Providing new road infrastructure

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Induced traffic is a well-documented phenomenon, whereby highway and road expansion tends to increase congestion by increasing demand. A 2011 study[22] analysing historical travel data from hundreds of population hubs in the US noted 'a fundamental law of road congestion: adding 10 percent more lane miles to a city increases vehicle miles traveled by 10 percent. That is, in less than 10 years, new roads cause traffic increases directly proportional to the increase in capacity. This law appears to hold for major urban roads, non-urban interstate highways near major cities, and urban interstates'.

A 2016 study[23] found that 'Increasing road capacity allows more vehicle travel to occur. In the short term this consists primarily of generated traffic: vehicle travel diverted from other times, modes, routes and destinations. Over the long run an increasing portion consists of induced vehicle travel, resulting in a total increase in [vehicles miles travelled]'.

Not only is providing new roads generally ineffective at reducing congestion, but the resulting disruption from roadworks will exacerbate a key factor in London congestion - as the INRIX report[24] highlighted - while providing little benefit beyond the status quo (as road demand is flat or declining, bar commercial vehicles). TfL's Road Modernisation Plan is a significant and welcome investment in infrastructure, but - like the Cycle Superhighways - such work inevitably adds to disruption and congestion. This reality should be acknowledged. Nevertheless, we support TfL's approach of not pursuing a 'new roads' agenda, but rather finding ways to use existing infrastructure more effectively.

The investment case for new roads should therefore depend on the cost and benefits in terms of additional transport capacity to move people and goods around, i.e. the incremental economic activity made possible, rather than their potential to cut congestion. Policy efforts should also be focused on making more of existing infrastructure - and we would be happy to explore how we could support in gathering and sharing data on road quality.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

The risk of new roads encouraging more people to drive - as outlined above - can best be mitigated with an effective demand-side management strategy. This could be achieved via effective price signals to road users, incentivising them to reduce their road travel demand when and where congestion is likely. Our responses to Questions 5 and 6 suggest possible innovations for the Congestion Charge - should an alternative approach be considered in future - which may help deliver these price signals e.g. a per-mile charge helps to reduce road travel demand, while a time-of-day charge helps in shifting demand to off-peak periods. As mentioned earlier, any changes to the pricing regime should be backed by evidence of their effect and balanced against the cost of implementing them.

[22] Property and Environment Research Center
[23] Victoria Transport Policy Institute
[24] INRIX report

Any such charges should also be designed to reflect the erosion of the short-term benefit from increased road capacity, and should ensure that those who cause congestion pay for it. This is particularly important where alternative transport modes have a different funding model which may rely - or be perceived to rely more - on the user rather than the taxpayer. Road pricing in this case should ensure that there is a level playing field amongst competing modes of transportation.

16. How should new road infrastructure be funded?

N/A.

Maximising available road space

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

We cannot comment on the effectiveness of the measures nor recommend improvements but we strongly support the principle of minimising the impact of roadworks on congestion, given their 362% increase[25] between 2012 and 2015 was a significant factor in slowing travel times.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

We cannot quantify the effect of such space on congestion, but it is important to note the impact - albeit temporary - of planned roadworks on London congestion.

Our vision for London is one in which Londoners use a mix of transport options including public transport, taxis and PHVs, and walking and cycling, without the need to drive their own car. To encourage this behaviour, London must be a place that is safe, enjoyable and welcoming for pedestrians and cyclists.

We support Cycle Superhighways and back the new Mayor's stance on pedestrianising major recreational areas of Central London. The pedestrianisation plans for Oxford Street - where air quality is notoriously poor - should result in a significantly improved experience for Londoners and tourists.

TfL and the Mayor's office should note the impact of pedestrianisation for Londoners with disabilities or access needs, including wheelchair users. We are confident that adequate provision can be made by TfL to allow services like uberWAV[26] to continue to serve passengers who rely on affordable, reliable vehicle access to the impacted areas.

We also note that there has been insufficient acknowledgement of the impact of construction and new infrastructure projects on the road network and congestion. In the future - for example, during the construction of the remaining planned Cycle Superhighways and the forthcoming closure of Tower Bridge -

[25] INRIX report

[26] UberWAV enables passengers to request a wheelchair accessible vehicle through the Uber app. We are proud to have made one of the biggest ever investments in accessible private hire transport in London to introduce the service, giving wheelchair users more choice to travel safely and affordably around their city.

TfL should communicate proactively to commuters and policy makers the short-term impact on traffic levels in London.

Active traffic management

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

Cities and regulators should embrace technology in their efforts to tackle big problems like congestion. That means harnessing not only the technology they can deploy but also the technology companies which can help deliver solutions at scale.

Uber partner-drivers use GPS for real-time information about traffic speed and accidents to highlight delays and suggest alternative routes. This helps optimise route decisions, and we welcome efforts to make more timely and relevant data available to software developers and consumers. This could include TfL providing updates and information in a software-friendly manner, to be incorporated into apps used by Londoners.

Regular, on-demand and accurate information flows are integral to the modern consumer experience - and increasingly so for travel. So as a GPS technology tracking all 8,000 London buses, iBus is a technology that can help TfL manage congestion. Recognised[27] for its innovation following launch a decade ago, iBus still merits sufficient investment and upgrade to help efficiently allocate resources in the bus network and ensure the system can keep pace with other GPS technologies that have raised consumer expectations of such applications. We support TfL's approach of making its live bus data available for the likes of Citymapper[28] to integrate and offer free to consumers at scale, rather than spending heavily to build and promote its own dedicated bus app. This open approach should continue to ensure that innovative businesses can help cities move as efficiently as possible.

uberPOOL is an example of how technology can help take cars off the road. Since launch last December, there have been over two million trips, with shared journeys saving more than 1.3 million miles driven, 98,000 litres of petrol and 231 metric tonnes of CO2. A report[29] by the International Transport Forum, the OECD's transport research arm, produced a model of a future world where *all* trips are completed by a fleet of shared use vehicles deployed in an uberPOOL-like configuration - with remarkable effects. Congestion was eliminated and traffic emissions were reduced by one-third, with the distance driven by the shared cars estimated to be 37% less than today, even during peak hours. In addition, 95% less public space would be required for parking, freeing up room for public parks, broader sidewalks and bicycle lanes. TfL should support the mass adoption of technology-powered car pooling services.

Uber would be happy to discuss how we can help provide TfL with data and analysis to support the development of more effective active traffic management.

[27] iBus wins Innovation Award
[28] An example of Uber's multimodal integration with Citymapper is here
[29] International Transport Forum report - Shared Mobility: Innovation for Liveable Cities

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

N/A.

London Cab Ranks Committee
Response to the
London Assembly Investigation into Traffic Congestion in London

About the London Cab Ranks Committee:

The London Cab Ranks Committee is one of the London trade's oldest taxi driver committees, for many years working with the former Public Carriage Office on cab rank issues.

Today the London Cab Ranks Committee meets regularly with and is recognised by Transport for London as the licensed taxi driver body which represents London taxi drivers' views and concerns regarding taxi rank and highways issues. It is currently comprised of three driver groups; Unite the union Cab Section, the Licensed Taxi Drivers Association and the London Cab Drivers' Club.

The London Cab Ranks Committee supports this investigation into traffic congestion and will fully engage with any initiatives that come from the investigation.

Questions & Responses:

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

There is little contention that congestion has hugely increased in recent years. Congestion is no longer confined to the rush-hour, specific times, locations or dates and is no longer predictable before commencing journeys. Many areas of London are now constantly gridlocked: Centre Point, Russell Sq to Euston Road and the Embankment are just a few examples

The causes of congestion are many-fold including too many vehicles using the available road space, roadwork's, cycle lanes, bad traffic light phasing and parked vehicles. The effect of the growth in traffic congestion is slower journey times, at a cost to the economy and London's place as a world city, increased pollution, both air quality and greenhouse gas emissions has increased frustration for all road users. Much of the congestion has been the result of inactivity in tackling congestion over many years ago and in putting in place road schemes without adequate planning of the resulting traffic conditions, such as the cycle network.

2. What are the key causes of these changes in congestion?

There is far more traffic using the roads which we believe is primarily caused by the erosion of the effectiveness of the Congestion Charge and the huge increase in private hire numbers that all converged into the centre of London.

There is no planning of roadwork's and schemes and often these have a cumulative effect on traffic causing even further traffic congestion. Traffic schemes, such as the Cycle Superhighway, Tavistock Place and Centre Point have been put in place with no thought about the consequences or plans to relieve the resultant congestion. Badly placed traffic lights and longer red light phasing for vehicular traffic add to the congestion.

There appears to be no joined-up thinking to tackle traffic congestion within City Hall, the London Boroughs or The City of London. There needs to be more liaison to ensure that one traffic scheme does not conflict

with another and the effects of any schemes are fully understood across all of the affected areas. An example of this is the proposed Tottenham Court Road scheme where Camden Council's decisions will have a direct impact on Westminster Council's traffic planning.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Unpredictable journey times through increased congestion slow people's movements down in many ways at a huge cost to London's economy and businesses. Journey times increase which threatens London's place as a city for business. The increased pollution is unnecessary and unwelcome and is taking an increasing toll on Londoner's lives, despite measures to control air quality. Increased congestion is ugly and detracts from London's beauty and attractiveness to tourists.

4. What can London learn from other cities in its effort to reduce congestion?

France has made moves to limit the movements of HGV's through Paris but we are unaware of any schemes that London could adopt.

5. How effective is the Congestion Charge? How should this scheme be modified?

The effect of the Congestion Charge has diminished since its introduction in 2003. When it was first introduced traffic levels notably reduced but have continued to climb ever since. It is our belief that the charge needs to be raised significantly and the money invested in increased public transport and road schemes specifically for public hire transport (taxis). A level of acceptable congestion should be targeted and the congestion charge set at an amount to achieve the required level of traffic.

An environmental element has been introduced to the congestion charge in order to encourage the take up of low emission vehicles. This should now be stopped and these vehicles should pay the full charge as the environmental aspect as been replaced by the ULEZ scheme. No matter how environmentally friendly a vehicle is it is still contributing to congestion and as ULEZ takes effect there will be an increasing number of low or zero emission vehicles undermining the congestion charge.

Private hire should have the congestion charge exemption removed as they now make up a disproportionate percentage of traffic within the congestion zone. With the introduction of Apps they now all drive to the central areas unnecessarily in order to wait for bookings. The situation has changed significantly since private hire was granted exemption and the removal of the exemption would help relieve central London traffic congestion.

6. To what extent would a usage-based road pricing regime help reduce congestion?

The London Cab Ranks Committee believes that a simple scheme like the congestion charge is easy to understand and if the price was set at a level that deterred unnecessary journeys, public hire transport was improved and the private hire vehicle exemption removed, this would have a bigger effect on reducing traffic levels than a more complicated user-based approach.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

The London Cab Ranks Committee welcomes the Ultra Low Emission Zone and we would expect traffic levels to fall initially. But ULEZ is not a substitute for a having a joined-up approach to properly managing traffic congestion in London. Also as low/zero emission vehicle numbers increase they could add to congestion if they are exempt from the congestion charge.

8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure

In any Tolling schemes we would expect Taxis to be given payment exemptions.

- Workplace Parking Levy

We support workplace parking levy's if the money is invested in public hire transport.

- Devolving Vehicle Excise Duty to London

We support this proposal in order that the Mayor could have more control over London's roads.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Delivery vehicles have a major impact on traffic congestion. A badly parked delivery vehicle causes unpredictability and traffic chaos. Removing delivery vehicle from congested areas during the day time would significantly help reduce traffic congestion.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Minicab numbers have greatly increased in the last few years. In 2013 there were 65,000 licensed private hire drivers and 52,000 private hire vehicles licensed in London by TfL. The latest August 2016 figures show that now there are now 110,000 private hire drivers and 82,000 private hire vehicles licensed in London. This represents an increase of 70% in drivers and 60% increase in vehicles on London's roads. The rate of increase is unsustainable for traffic congestion, as there is an increase of over 2,000 drivers and vehicles every month.

Minicabs already make up a large proportion of London's traffic and this is going to worsen by the day. The quickest and simplest way of addressing this is to remove the Congestion Charge exemption for private hire vehicles in London. There are other measures that need to be addressed such as capping the number of private hire drivers and vehicles and tackling driver standards, but removing the congestion charge exemption would be a good start. Private hire vehicles should also be brought into line with ULEZ and have Zero Emission Vehicles from 2018

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Although car clubs reduce the overall number of cars in society there is no difference in terms of congestion if a person is driving their own car or a car club car. It is better to encourage people to move to public hire transport rather than to car clubs.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

This is essential to the aim of reducing traffic congestion. We would argue that greater provision for taxis, such as improved ranks and access to all bus lanes, also aids reductions in congestion. A cheap, efficient bus service is required to reduce congestion and to shift people from their cars. We believe that an increase in the congestion charge could initially fund better bus services and allow fares to be cut. Along with schemes to reduce congestion this would encourage more users and increase revenue allowing more funds for improvements for road infrastructure and more buses. If buses were to be run by TfL this would also allow more revenue for the Mayor.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

TfL can increase the congestion charge, allowing reduced bus fares and increase bus frequencies. Taxi usage would increase with less congestion and it would be safer for cyclists and pedestrians. Reduced traffic congestion with incentives and disincentives and having an integrated approach is key to successfully reshaping London's roads.

14. Can new road infrastructure help reduce traffic congestion? What specific new infrastructure is required in London?

Road space is at a premium in London and an imaginative approach to road infrastructure is required. There should be far more bus and taxi corridors that are exclusive to taxis and buses. This would allow buses and taxis to travel without hindrance from other traffic and greatly increase efficiency of travel. Cyclist and pedestrians would also be able to use these routes increasing their safety. London's taxis will become zero emission from 2018 greatly contributing to cleaner air quality.

15. To what extent is there a risk of new roads encouraging more people to drive? How can this risk be avoided?

Just building new roads and road infrastructure will encourage more people to drive. This can be avoided by having a planned approach that puts public hire transport at the heart of any new developments and aims to cut car use.

16. How should new road infrastructure be funded?

Funding should come from central government and London's business community as they will gain from reductions in traffic levels. A city that moves freely will be more business friendly and attract increased tourists and visitors. A reduction in traffic congestion could become self funding through the gains this would achieve.

17. How effective are TfL's measures to limit roadworks, such as the lane rental scheme? How can these measures be made more effective?

In our opinion schemes to reduce roadwork congestion are ineffective and actually contribute to congestion. There needs to be a more joined up approach to the whole approach to road use and planning with roadwork's a part of the planning. There needs to be far more conditions put on contractors and time limits and the effects on congestion fully understood. There needs to be a completely new approach to this aspect of tackling congestion.

18. What effect has the additional space provided for cycling and pedestrian infrastructure had on congestion?

Whilst we support improved facilities for cyclists and pedestrians the approach taken thus far are irresponsible. Schemes were rushed through quickly with no regard to the effects on traffic congestion and pollution levels. The damage is now done and it is imperative that solutions are now found that mitigate the effects of these schemes on traffic levels. Removing traffic from London's roads as we have previously suggested will go a long way to countering the congestion levels caused by these schemes. Traffic light phasing remains a big issue along these schemes with many pinch points being experienced, which are causing unnecessary congestion. An example of this is travelling north on New Bridge Street at Fleet Street.

19. How can the use of technology be enhanced to help TfL manage congestion? For instance, how can the iBus system be used for this purpose?

All advances in technology that provide real life traffic data are welcome. On there own they will not reduce congestion but they can be used to better model and understand traffic flows and the consequences of any changes.

20. How effective has the Road and Transport Enforcement team been in tackling congestion?

We have seen very little evidence of the Road and Transport Enforcement team which suggests their numbers need increasing.

END

Unite the Union Cab Section submission to the London Assembly Investigation into Traffic Congestion in London – 31st August 2016

Introduction

- This response is submitted by the Cab Section of Unite the union, the UK's largest trade union with 1.42 million members across the private and public sectors. The union's members work in a range of industries including: manufacturing, financial services, print, media, construction, energy generation, chemicals, transport, local government, education, health and not for profit sectors.
- In the arena of transport Unite represents over a quarter of a million members in all transport modes, making it the largest transport union in the UK.
- Unite has obtained the views of our thousands of taxi driver members through our lay member committees. Therefore Unite is in a unique position to submit a response to this investigation.

1. How has traffic congestion changed in London in recent years? Are there differences in the amount, time, type and/or location of congestion?

There is little contention that congestion has increased massively in recent years. Congestion is no longer confined to the rush-hour, specific times, locations or dates and is no longer predictable before commencing journeys. Many areas of London are now constantly gridlocked, such as Centre Point, Russell Sq to Euston Road and the Embankment. The causes of congestion are many-fold including too many vehicles using the available road space, roadwork's, cycle lanes, bad traffic light phasing and parked vehicles. The effect of the growth in traffic congestion is slower journey times, at a cost to the economy and London's place as a world city, increased pollution, both air quality and greenhouse gas emissions and increased frustration for all road users. Much of the congestion has been the result of the last Mayor's inactivity in tackling congestion many years ago and in putting in place road schemes without adequate planning of the resulting traffic conditions, such as the cycle network. Unite fully supports this investigation into traffic congestion and will fully engage with any initiatives that come from the investigation.

2. What are the key causes of these changes in congestion?

There is far more traffic using the roads which we believe is primarily caused by the erosion of the effectiveness of the Congestion Charge and the massive increase in private hire numbers that all converged into the centre of London.
There is no planning of roadwork's and schemes and often these have a cumulative effect on traffic causing even further traffic congestion. Traffic schemes, such as the

Cycle Superhighway, Tavistock Place and Centre Point are put in place with no thought about the consequences or plans to relieve the resultant congestion. Badly placed traffic lights and longer red light phasing add to the congestion.

There appears to be no overriding joined-up thinking to tackle traffic congestion within City Hall, the London Boroughs and The City of London. There needs to be more liaison to ensure that one traffic scheme does not conflict with another and the effects of any schemes are fully understood across all of the affected areas. An example of this is the proposed Tottenham Court Road scheme where Camden Council's decisions will have a direct impact on Westminster Council's traffic planning.

3. What impact does congestion have on Londoners, the city's economy and its environment?

Unpredictable journey times through increased congestion slow people's movements down in many ways at a huge cost to London's economy and businesses. Congestion leads to increased and more unreliable bus journeys leading to more people returning to their cars. Taxi journey times increase and the resulting increase in journey times threatens London's place as a city for business. The increased pollution is unnecessary and unwelcome and is taking an increasing toll on Londoner's lives, despite measures to control air quality. Increased congestion is ugly and detracts from London's beauty and attractiveness to tourists.

4. What can London learn from other cities in its effort to reduce congestion?

France has made moves to limit the movements of HGV's through Paris but we are unaware of many schemes that London could adopt.

5. How effective is the Congestion Charge? How should this scheme be modified?

The effect of the Congestion Charge has diminished since its introduction in 2003. When it was first introduced traffic levels notably reduced but have continued to climb ever since. It is our belief that the charge needs to be raised significantly and the money invested in increased public transport and road schemes specifically for public transport. A level of acceptable congestion should be targeted and the congestion charge set at an amount to achieve the required level of traffic.

An environmental element has been introduced to the congestion charge in order to encourage the take up of low emission vehicles. This should now be stopped and these vehicles should pay the full charge as the environmental aspect as been replaced by the ULEZ scheme. No matter how environmentally friendly a vehicle is it is still contributing to congestion and as ULEZ takes effect there will be an increasing number of low or zero emission vehicles undermining the congestion charge.

Private hire should have the congestion charge exemption removed as they now make up a disproportionate percentage of traffic within the congestion zone. With the introduction of Apps they now all drive to the central areas unnecessarily in order to wait for bookings. The situation has changed significantly since private hire was granted exemption and the removal of the exemption would help relieve traffic congestion.

6. To what extent would a usage-based road pricing regime help reduce congestion?

Unite believes that a simple scheme like the congestion charge is easy to understand and if the price was set at a level that deterred unnecessary journeys, public transport was improved and the private hire exemption removed, this would have a bigger effect on reducing traffic levels than a more complicated user-based approach.

7. How might the Ultra Low Emission Zone and Emissions Surcharge affect congestion levels?

Unite welcomes the Ultra Low Emission Zone and we would expect traffic levels to fall initially. But ULEZ is not a substitute for a having a joined-up approach to properly managing traffic congestion in London. Also as low/zero emission vehicle numbers increase they could add to congestion if they are exempt from the congestion charge.

8. What would be the benefits and drawbacks of these other interventions?

- Tolling for river crossings or other major infrastructure

In any Tolling schemes we would expect Taxis to be given payment exemptions.

- Workplace Parking Levy

We support workplace parking levy's if the money is invested in public transport including taxis.

- Devolving Vehicle Excise Duty to London

We support this proposal in order that the Mayor could have more control over London's roads.

9. How can the Mayor and TfL reduce the number of delivery vehicles on London's roads, especially in congested areas at peak times?

Delivery vehicles have a major impact on traffic congestion. A badly parked delivery vehicle causes unpredictability and traffic chaos. Removing delivery vehicle from congested areas during the day time would significantly help reduce traffic congestion.

10. To what extent is an increase in minicabs contributing to traffic congestion, and how could this issue be addressed?

Minicab numbers have increased massively in the last few years. In 2013 there were 65,000 licensed private hire drivers and 52,000 private hire vehicles licensed in London by TfL. The latest August 2016 figures show that now there are now 110,000 private hire drivers and 82,000 private hire vehicles licensed in London. This represents an increase of 70% in drivers and 60% increase in vehicles on London's roads. The rate of increase is unsustainable for traffic congestion, as there is an increase of over 2,000 drivers and vehicles every month.

Minicabs already make up a large proportion of London's traffic and this is going to worsen by the day. The quickest and simplest way of addressing this is to remove the exemption for private hire vehicles in London. There are other measures that need to be addressed such as capping the number of private hire drivers and vehicles in London and tackling driver standards, but removing the congestion charge exemption would be a good start.

11. What contribution can car clubs make to tackling congestion, and how can the Mayor and TfL encourage these?

Although car clubs reduce the overall number of cars in society there is no difference in terms of congestion if a person is driving their own car or a car club car. It is better to encourage people to move to public transport rather than to car clubs.

12. To what extent could greater efficiency in the provision of bus services help reduce congestion, and how?

This is essential to the aim of reducing traffic congestion. We would argue that greater provision for taxis, such as improved ranks and access to all bus lanes, also aids reductions in congestion. A cheap, efficient bus service is required to reduce congestion and to shift people from their cars. We believe that an increase in the congestion charge could initially fund better bus services and allow fares to be cut. Along with schemes to reduce congestion this would encourage more users and increase revenue allowing more funds for improvements for road infrastructure and more buses. If buses were to be run by TfL this would also allow more revenue for the Mayor.

13. How can TfL further encourage a shift from private car use to public transport or active travel modes?

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From: peter hartley [redacted]
Sent: 16 August 2016 12:23
To: Georgina Wells
Subject: Investigation into traffic congestion.

Before dealing with your individual questions/suggestions its important to state a general principle that if you want to encourage people to walk more as part of a sustainable transport policy you must give pedestrians a safe environment which is free from appalling air pollution. The current awful traffic congestion in London and particularly in its centre is simply caused by a lack of political leadership that does nothing to limit the amount of traffic using our roads. The increasing population, increased affluence and a failure to tax motoring so there is a financial deterrent to driving has led to the current nightmare of polluted streets with shocking killed and seriously injured statistics.

1. It has got noticeably worse and is now spread throughout the day to avoid the clogged streets in the rush hour.
2. An increased population and the relatively cheaper cost of motoring. Cheaper petrol and more efficient cars.
3.It makes other forms of movement particularly walking and cycling more dangerous and unpleasant due to high air pollution
4. Other Cities are increasingly limiting vehicle movements through taxation and physical means-pedestrianisation etc
5. Very effective. It is a real deterrent to entering the centre of London and should be substantially increased. And the current north/south road exemption removed.
6.Absolutely essential. Road pricing must act as a deterrent to vehicle use.
7. Initially will reduce congestion but long term benefits will disappear as the population switch to more eco friendly vehicles.
8. Road/toll pricing is the most effective way of reducing vehicle movement. Workplace Levy essential to reduce numbers.
9. By offering incentives to major consolidation schemes. Why are there so many different haulage Companies delivering to the same address.
10. A limit to the numbers would help but the main problem is that there are too many black cabs and they are allowed to cruise around to pick up fares.
11. Definitely would help. Financial assistance is the only way to promote faster growth.
12 There are too many buses and many empty ones on certain routes.
13.By making our streets less polluted and safer.
14. Absolutely NOT! New road building only encourages more vehicles on the road which ultimately creates more congestion.
15. You cannot avoid the risk. if you make vehicle travel easier, more people will drive.
16.We should NOT be building new roads under any circumstances.
17. No comment
18. The whole purpose of rebalancing our road space in favour of pedestrians and cyclists will mean less space for other road users. There will be more congestion until the new road system is accepted and alternative routes come into use. It is a price worth paying.
19. No comment.
20. No comment.

I again stress that drastic measures have to be taken if London really wants to reduce congestion. That means making the sustainable transport modes so acceptable by giving us safe and pollution free streets. There will have to be severe restrictions on vehicle use in London if we are to achieve the City we deserve.

Peter Hartley
Chair
Westminster Living Streets

Please could we be kept informed as to progress of this investigation. We would be happy to address or meet any members of the Committee at any time.

Turning the Corner - briefing
Simpler, safer junctions

Updating the Highway Code to make junctions simpler and safer for everyone

Introduction

British Cycling has conducted research into how to make junctions simpler, safer and more efficient for all road users.

We would like the support of the Mayor of London, for our proposals to update the Highway Code to create a simple rule for giving way when turning.

The full report is available at:
https://www.britishcycling.org.uk/zuvvi/media/bc_files/campaigning/Turning_the_Corner_-_Priority_changes_at_junctions_2016.pdf

The problem

Negotiating a junction is the most hazardous manoeuvre you make on the road, whether driving, cycling or walking. The rules should be simple and unambiguous.

Nearly two-thirds of motor vehicle collisions take place at junctions. This increases to three-quarters of collisions for people cycling. In London, over half of all cycling fatalities involve an HGV turning – the notorious 'left hook' collision. People walking and cycling in the UK make up a larger than average share of all road deaths compared to other European countries, and yet they are a smaller proportion of road users.

> *The likelihood of a pedal cyclist being killed per distance travelled in the UK is approximately twice that in the Netherlands, Denmark and Norway* (PACTS, 2016)

The Highway Code can confuse matters as it contains many rules about junctions, often with a different emphasis, yet fails to cover all situations. For example, Rule 170 requires drivers to give way to pedestrians already crossing but there is no direct equivalent rule regarding cyclists. There are at least 14 different rules in the Highway Code which relate to people walking and cycling at junctions and it can be hard to interpret what is the correct behaviour.

It is no coincidence that countries that have clear rules about giving way when turning have a larger proportion of people walking and cycling. Making junctions safer and making them feel safer, will go a long way to addressing people's concerns about walking and cycling.

Recommendation

New Highway Code rule

"When turning at a junction, give way to people walking, cycling or driving who are going straight ahead."

A simple, 'universal' rule in the Highway Code to cover turning at junctions would enhance the safety and convenience of all road users.

What would this mean?

- **For people driving** it would mean - when turning at a junction, give way to people cycling or walking who may be on your nearside or crossing the road.
- **For people cycling** it would mean - when turning at a junction, give way to people walking who are crossing the road into which you are turning.
- **For people walking** it would mean - greater protection when crossing a side road or other junction.

The benefits

- **Safety**: potential to achieve Dutch levels of safety where the risk of being killed per kilometre walking is 34% lower and half the risk for cycling, when compared to the UK (TRL 2016).
- **Efficiency**: estimated 15% to 40% increase in signalised junction efficiency, reducing congestion and improving air quality (PJA 2016).
- **Infrastructure**: direct crossings for people walking and the ability to define a cycle track with priority across a junction helping to increase convenience (PJA 2016).
- **Healthy streets**: by improving safety, enhancing the ability to create convenient infrastructure for people walking and cycling and increasing junction efficiency, the proposal hits multiple targets to help create healthy streets.

Making it happen

1. Support the campaign by contacting British Cycling ahead of the launch on 5 December.
2. Write to the Secretary of State for Transport to call on him to; set out a timetable to update the Highway Code, include a universal rule on giving way when turning and conduct further research into applying these rules at traffic signals.

Contact
Martin Key, British Cycling, campaigns manager
[redacted]