

# GREATER LONDON AUTHORITY

**(By email)**

Our reference: MGLA110822-7073

Date: 20 September 2022

Dear

Thank you for your request for information which the Greater London Authority (GLA) received on 10 August 2022. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

*Requested information: The mayor stated in March 2021 that TfL would be looking to free up sites for use as local consolidation centres to support deliveries on cargo bikes (<https://www.london.gov.uk/questions/2021/0993>). I would like any and all information pertaining to this and how far it has progressed since then. I would also like the results of the trials carried out by the TfL Freight Lab on e-cargo bike delivery*

I can confirm that the GLA holds information within the scope of your request, in particular we hold information in relation to the TfL Freight Steering Group of 28 April 2022 and 29 June 22. We consider that this is exempt information by virtue of the disclosure-exception provisions found under regulation 12(4)(d) of the EIR.

Regulation 12(4)(d) is engaged when the request relates to material that is still in the course of completion, unfinished documents or incomplete data. If the information in question falls into one of these categories, then the exception is engaged.

Guidance<sup>1</sup> published by the Information Commissioner clarifies:

*"The fact that the exception refers to both material in the course of completion and unfinished documents implies that these terms are not necessarily synonymous. While a particular document may be itself be finished, it may be part of material still in the course of completion. An example may be where a public authority is formulating and developing policy."*

The same guidance also clarifies that material which is still in the course of completion can include information created as part of the process by which it formulates policy and reaches decisions.

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<sup>1</sup> [eir material in the course of completion.pdf \(ico.org.uk\)](https://www.ico.org.uk/for-organisations/guide-to-the-information-commissioner/guidance-notes/guidance-note-12-4-d)

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It is not necessary for the GLA to demonstrate where disclosure might have a particular adverse effect in order to engage the exception, but any adverse effects of disclosure may be relevant in the public interest considerations which the GLA is required to balance in order to decide whether the information should be withheld.

There is a strong public interest in the release of information that would inform and engage public debate on issues pertinent to transport strategy. Disclosure would also therefore help reassure the public that we are considering the most appropriate options and advice regarding the Cargo Bike Strategy under development by TfL.

There is a general public interest in transparency in relation to transport related matters in London. Disclosure of this information would enable members of the public to understand the decision making process.

Effective policy and decision making should be informed by engaging with the public and key stakeholders; however this engagement needs to be structured to be effective. In this instance, the information you have requested will form the basis for how TfL will shape the strategy and how GLA officials will seek to influence that strategy.

The publication of this information at this stage of the policymaking process will pre-empt decisions that need to be proposed by senior TfL officials and then discussed with senior GLA officials. It would be likely to create a false perception that the GLA and TfL have agreed to certain actions which are not yet finalised.

Release of this information at this time would divert attention and resources away from the task at hand and towards responding to external requests whilst discussions are still ongoing.

Furthermore, the information is currently scheduled to be published in the autumn – the target date is November.

We are aware that TfL intends to publish a Cargo Bike Strategy document that is currently drafted to include:

- Background context on the growth of cargo bikes in London
- Strategic objectives and associated policies for promoting cargo bikes in London including on infrastructure and capacity, safety, land use and behaviour change
- The publication will also include an action plan setting out actions with lead organisations and target dates for completion

Each part of this document will include land use policy to free up land for consolidation centres.

The GLA therefore considers that the best interests of the public – i.e. the public interest – is best served by ensuring that public authorities continue to deliberate robustly and comprehensively, considering all options and their potential impacts, in order for the best possible decisions to be taken.

The GLA does not hold information relating to the TfL Freight Lab e-cargo bike trial. You may wish to submit a further request to [foi@tfl.gov.uk](mailto:foi@tfl.gov.uk).

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA110822-7073.

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Yours sincerely

## **Information Governance Officer**

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>