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].

---

[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

---

[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.