



PROOF OF EVIDENCE

**NATIONAL UNION OF RAIL, MARITIME & TRANSPORT
WORKERS TAXI BRANCH (RMT)**

SUMMARY

This document forms the basis of evidence to be given at the Public Inquiry regarding the experimental traffic order on Tavistock Place.

PUBLIC INQUIRY

Evidence at the inquiry shall be given by Ray Alleeson RMT RANKS AND HIGHWAYS OFFICER.

TRAFFIC INCREASES

- Tables shown in Figs. 1, 2, 3 & 4 show increases in traffic on roads surrounding the scheme. These include local roads. Sections within Camden's Statement of Case (SOC) listed below point to the fact that this was not the predicted outcome.

Camden SOC 9.2, 9.4. Section 1. 4.19

- Whilst the scheme has reduced westbound traffic along the corridor there has been a huge increase of 76% in vehicles that are travelling east. This increase is shown in Fig. 4. Impending HS2 works may result in further traffic increases along the corridor due to construction traffic on Euston Road increasing journey times.
- It is RMT's belief that Camden are failing their Network Management Duty (NMD) as stated within the Traffic Management Act 2004 sections 16 & 17 as well as the overview from government. To quote the Government overview 'The TMA places a duty on local authorities to make sure traffic moves freely and quickly on their roads and the roads of nearby authorities'. RMT fully appreciate that the word traffic refers to all road users within the act and that Camden's policies and objectives allow this scheme to favour cyclists and pedestrians. However the traffic increases seen on surrounding roads (up to 320%) point to a failure in Camden's NMD.
- London's licensed Taxi Drivers are experiencing increased journey times to and from UCH and other NHS buildings within the area. Taxis are prescribed vehicles that are fully wheelchair accessible with a swivel seat to help vulnerable users such as the elderly and post operation patients. A Taxi discount scheme operates from the rank at UCH in Beaumont Place where patients in particular are able to use this service. Taxis are not the only Hospital transport service to experience these delays when transporting vulnerable users. RMT believe that the important role that Taxis play within the community has not been taken into consideration by Camden. This is evident in Camden's interpretation of the Mayor's Transport Strategy currently under consultation. Evidence of such is listed.

Camden's SOC 5.13, 9.6 SECTION 4 UCH consultation response @10HSTAXI (TWITTER)

- RMT believe that extensive traffic monitoring was not carried out as stated in an email from Louise McBride, Camden's Acting Assistant Director, on 11//02/16.

The traffic increases have been split into 4 areas. North, East, South & West.
Data taken from Camden's consultation document 'Proposed Improvements'

Fig 1. NORTH

LOCATION	AM %	NOON %	PM %	AVERAGE %
Endsleigh Gdns (east of Gordon St)	131	554	275	320
Endsleigh Place (east of Tav Sq)	157	66	77	100
Tav Sq (Sth of Endsleigh Place)	400	-14	316	234

Fig 2 EAST

Wakefield St (Sth of Tav Place)	188	82	27	99
Regent Sq (East of Wakefield St)	50	27	57	44
Judd St (North of Tav Plc)	58	41	11	36

Fig 3 SOUTH

Southampton Row (Nth of Fisher St)	99	46	85	76
Russell Sq (North of Montague Pl)	80	-7	119	64
Great Russell St (West of Bury Pl)	62	94	88	81
Earnshaw St (South of Bucknall St)	29	20	25	24

Fig 4 WEST

Gower St (South of University St)	23	33	31	29
Gower Place (West of Gower Ct)	267	161	167	198
Byng Place (West of Torr Sq) East	78	59	93	76

AIR POLLUTION

- RMT question as to why no extensive air pollution monitoring was put into place on roads in and around the corridor. Whilst we welcome any air pollution reduction along the corridor, this pollution has been displaced onto residential roads nearby. Camden is asking us to believe that, uniquely, pollution during this trial is inversely proportionate to traffic levels.
- We consider data that was stated in consultation document 'Proposed Improvements' is misleading and would lead the public into thinking that there has been an overall reduction in air pollution across the whole area. From our investigations we believe these monitors to be background monitors which should not have been adopted for this type of scheme. This scheme required multiple roadside monitors in place before and during the scheme to create an accurate assessment of air pollution changes on nearby roads.
- Evidence – Camden's SOC 7.12, 7.13, 9.5. Summary of Report (SOC) 4.5, 4.15

CYCLE TRACKS & CYCLE SPEEDS/ACCIDENTS

- It is RMT's opinion that the section of corridor that runs between Woburn Place and Judd St should not have been subject to any road layout alterations. There was adequate provision for cyclists and apart from at the junctions there were zero accidents. Once this scheme was implemented there was an accident along the track itself. Whilst Camden may not be able to achieve their desired 2.5m cycle track as laid out in the London Cycling Design Standards (LCDS), they will, however, by returning these sections of corridor back to the previous layout reduce accidents along this section. Whilst we fully understand Camden's desire to meet the recommendations set out within LCDS we fully believe Camden were blinded by an intent to reallocate road space to cyclists without a full study into whether this was a necessary action and whether this was the right environment in which to do so. LCDS are recommendations that should only be implemented in the right environment.
- The section of corridor that runs between Gower Street and Woburn Place provides ample space for a two way segregated cycle track whilst allowing motor vehicles west bound. The only pinch point along this section would be the where the taxi rank is situated outside the

Tavistock Hotel. We are confident that if all parties were to work together a practicable solution could be found to this pinch point. RMT would also welcome additional signals at the junction with Gordon Square to ensure safe vehicle turns and aid in reducing cycling and motor vehicle speeds.

- As stated by Camden's SOC 7.8 giving extra width to cyclists has increased accidents and speeds along the corridor. Cycling speeds along the corridor have become a major problem and our branch has received numerous complaints from members. Evidence of cyclists racing through the corridor can be seen via the Strava app. The app enables cyclists through GPS tracking to race against their own personal best times and that of the leader board. This year has already seen no fewer than 3000 cyclists race against times on this route. RMT believe as the increase in accidents along the corridor seem to be a result of cyclists speeds and overtaking there is a strong case to implement minimum cycle track widths along large sections of the corridor. This would prevent overtaking which seems to be Camden's main point of concern regarding increased accidents.
- RMT consider Camden's claim that there Cycling Level of Service (CLOS) has doubled its previous score to be speculative at best (SOC 7.10). Camden state that the 'CLOS assessment areas which have benefited the greatest from the scheme layout are safety and comfort'. As shown by the data accidents have increased along the corridor casting a shadow upon Camden's CLOS claim. RMT believe that Camden can improve all aspects of the CLOS score by keeping westbound traffic within the scheme.
- Using Data from interactive maps provided by TFL collision map and Crashmap we have seen an increase in cycling accidents. Given that speed seems to be the reason for this sharp increase, we believe that a reduction in cycle track widths would naturally slow down cycling speeds whilst deterring overtaking. At this time we are unable to assess the full impact of accidents along the corridor post trial. DfT are yet to publish statistics for the last quarter of 2016 so there maybe additional increases.

Camden's SOC 7.8, 7.10, TFL Collision map, Crashmap

HS2

- RMT consider that HS2 was not seriously taken into consideration when this scheme was in its planning stage. Whilst a consultation had taken place in 2015 for Euston Station which showed some road closures, the full nature of the construction works were not known. This should have been a contributory factor when planning this scheme. We feel there were much less complicated measures that could have been implemented to keep cyclists safe along this corridor whilst the full extent of HS2 works was known.

- Information provided on 25/11/13 by HS2 Phase One Environmental Statement published on Camden's website, indicates that Camden had enough information to consider alternative options along the corridor. HS2 give clear indications of locations of where they envisage partial or full road closures. These include Euston Road and Endsleigh Gardens. HS2 also give clear indications of where they expect increases in NO2 emissions due to construction traffic. These include Euston Road and Gray's Inn Road. Camden expected traffic from the scheme to displace to both of these roads but seem not to have accounted for the HS2 information they published on their website.
- HS2 Phase One Environmental Statement 25/11/13. Camden's SOC 9.4

PEDESTRIANS

- Camden state that due to narrow pavements on the section south of Tavistock Sq. and the need to widen the footway they are prevented from allowing westbound traffic. We believe there is ample space to allow westbound traffic whilst still providing a width improvement. If this section was of such great concern to Camden why did they not take any pedestrian counts to verify their position?
- There are many options available to improve the pedestrian experience within the area as a whole. Good sign posting encouraging pedestrians to adopt different and more pedestrian friendly desire lines could easily be implemented. Pedestrians should be encouraged to use the number of squares and pedestrian walkways in and around the area. We would also ask why countdown timers were not introduced along the corridor to improve safety.
- Along the corridor as a whole there is ample width to accommodate pedestrian flow. There are sections that reduce to 2m width but with minimal street furniture these sections still provide ample space. Camden's SOC Section (5) 2.2.1 Camden reference from TFL's Pedestrian Comfort Level (PCL) (2010) guidance. We would ask whether Camden carried out PCL measurements along the corridor and the surrounding roads.
- Camden SOC 8.6. Camden SOC (5) 2.2.1. Consultation document' Proposed improvements'

TRAFFIC INCREASE EVIDENCE

Camden's SOC

5.13. The overall approach is to put into practice the theory of reducing car dependency at the same time as increasing active and sustainable travel. In this context, the Strategy establishes a target for modal shift, seeking an increase for all daily trips made by sustainable modes (walking, cycling and public transport) with a corresponding decrease in unsustainable modes – private vehicle, taxis and private hire vehicles. The Scheme is in line with this approach by means of reallocating space from motor vehicles to active and sustainable modes.

9.4 Whilst some traffic has inevitably displaced onto surrounding streets, the overall impact of traffic in the area is minimal as rather than local roads, the majority of traffic is diverted to more strategic roads, such as Euston Road and Grays Inn Road, which are considered more suitable to cope with this type of vehicle. In the absence of the trial the local area would see a greater influx of traffic resulting from the West End Project, further warranting the vitality of the scheme. Continuing the current trial traffic arrangements, compared to the alternatives suggested, will serve to reduce through traffic on the Corridor as indicated by modelling keeping traffic largely to the most appropriate routes and improving the local environment. Reasonable access to premises is maintained under the trial layout, although it is recognised that, with the westbound traffic movement removed, some journeys may take longer, particularly during peak hours.

9.6 More efficient use of the limited carriageway space will not only deliver environmental and personal health benefits but will also mean less traffic on the road. This brings benefits for vulnerable road users accessing both the Corridor and its surrounding area.

UCLH concerned about additional journey time from Gray's Inn Road and Queen Square hospitals to UCH campus. Patient Transport Services do not hold data recording the journey time increase but average westbound journeys from Queen Square to UCH campus have increased from 10 minutes to 45 minutes and from Grays Inn Road to UCH campus from 15 minutes to 37 minutes.

TWITTER @10HSTAXI

AIR POLLTION EVIDENCE

CAMDEN'S SOC

7.12. The main impact on local air quality is a reduction in vehicle emissions. The Scheme layout has significantly improved air quality along the Corridor; in addition to the Camden's fixed monitor at Russel Square, monitoring was undertaken at two further sites along the Corridor before and after the introduction of the Scheme. Additional monitoring was also undertaken after the Scheme's introduction on two local roads, to supplement statutory monitoring already taking place in the area. While the majority of local roads do not reflect increases in air pollution that could be ascribed to the displacement of traffic from the Corridor, there are exceptions, such as Endsleigh Gardens where displaced traffic may be adding to pollution levels. However it is 25 (Transport for London, 2014) 15 considered that the improvements to air quality in the Corridor more than offset a reduction in air quality on a limited number of other local roads, especially given the increased numbers of pedestrians and cyclists benefiting from better air quality by using the Corridor. National and Mayoral initiatives are expected to ameliorate to some extent any residual reduction in air quality.

7.13. It should also be noted that through the enhanced cycling facilities and the promotion of modal shift away from private motor vehicles the total amount of traffic in the area is likely to have reduced.

9.5 The Scheme is located within an area of central London which suffers from poor air quality. Air quality on the Corridor has improved as a result of the Scheme creating a more attractive environment for the large numbers of pedestrians and cyclists using the Corridor daily. Whilst there appears to have been some localised disbenefits in terms of air quality, the overall benefits from the scheme outweigh some localised negatives.

4.5 Concerns about the quality of London's air and its impact on public health are well documented. Appendix F refers to studies, findings and recommendations discussing the health and air quality benefits associated with high quality infrastructure. These studies etc. support officers' recommendation to retain the trial layout and progress potential improvements, should they be taken forward in the future.

4.15 As a result of failing to meet these Objectives within Camden, the whole of the Borough has been designated an Air Quality Management Area (AQMA) since 2000. This requires the Council to take action to reduce air pollution levels, and to monitor pollution levels across

the Borough. As a result, the Council has a regularly updated Clean Air Action Plan which currently has over 60 actions aimed at reducing pollution levels. The Council also has a monitoring network capturing AQ data from across the borough.

CYCLE EVIDENCE

CAMDEN'S SOC

7.8. As noted in section 3 the pre-trial layout was insufficient to cope with the high flows of cyclists along the Corridor. The Scheme has resulted 24 (Transport for London, 2010) 14 in a marked increase of cycle trips (up to 52% during peak hours). Early indications from draft collision data suggest an increase in accidents involving cyclists, but that the severity of injuries has reduced, with none reported as 'serious'. Given the increased width of cycle lane, it appears that cyclists' speed may sometimes have been a contributory factor. If so, there is scope to further improve the safety at junctions by, for example, raised entry treatments to reduce the speed of both motor vehicles and cyclists.

7.10. The Cycling Level of Service (CLOs) 25 score for the Scheme layout has more than doubled its preceding score. The CLOs assessment areas which have benefited the greatest from the Scheme layout are 'safety' and 'comfort.'

HS2 EVIDENCE

CAMDEN'S SOC

9.4 Whilst some traffic has inevitably displaced onto surrounding streets, the overall impact of traffic in the area is minimal as rather than local roads, the majority of traffic is diverted to more strategic roads, such as Euston Road and Grays Inn Road, which are considered more suitable to cope with this type of vehicle. In the absence of the trial the local area would see a greater influx of traffic resulting from the West End Project, further warranting the vitality of the scheme. Continuing the current trial traffic arrangements, compared to the alternatives suggested, will serve to reduce through traffic on the Corridor as indicated by modelling keeping traffic largely to the most appropriate routes and improving the local environment. Reasonable access to premises is maintained under the trial layout, although it is recognised that, with the westbound traffic movement removed, some journeys may take longer, particularly during peak hours.

PEDESTRIAN EVIDENCE

CAMDEN'S SOC

8.6 Subsequently BRAG suggested a further alternative which was to make a short section (from Bedford Way to Byng Place) two-way, This option does provide sufficient road width to accommodate the cycle lanes and two-way traffic. However, it does not leave any room to widen the footway in the section by Tavistock Square that currently has narrow footways and which would greatly benefit from footway widening.

2.2.1 The potential for improving facilities for pedestrians that are future-proofed against growth in footfall is an important consideration. Increased footway widths can encourage greater use of walking as a means of transport. They make pedestrians safer and more comfortable, and discourage them from encroaching into the cycle lanes or carriageway. Reducing widths has the opposite effect. The Department for Transport's (DfT) Adjacent and Shared Use Facilities for Pedestrians and Cyclists (2004) guidance states the recommended minimum width for urban footways on local roads should be 2m. However this needs to be unobstructed width. To ensure footway widths are inclusive for all users we must also consider the implications for people with mobility and visual impairments, as well as pram users. DfT's Inclusive Mobility (2005) indicates that a 2m clear width allows two wheelchair users to pass one another and 'should be regarded as the minimum under normal circumstances'. TfL's Pedestrian Comfort Level (2010) guidance takes account of DfT's guidance, considers obstructions such as street furniture e.g. street lighting, and recommends a minimum width of 2.9m. This is reflected in Camden's Streetscape Design Manual which recommends a 3m footway width. It is recognised that in a constrained area such as inner London, it is not always possible to achieve this width however it would need serious consideration alongside the needs of other modes.