



Campaign to Protect  
Rural England  
LONDON

70 Cowcross Street  
London  
EC1M 6 EJ

020 7253 0300

---

## **Response to Western Congestion Charge Zone Consultation by CPRE London**

CPRE London is the branch of the Campaign to Protect Rural England covering the whole of the London Region, both urban and rural. With the support of our members and in collaboration with neighbouring branches and other organisations in Greater London, we seek to ensure the sustainable management of London's resources - and its waste. We promote the concept of a world class city interconnected to a thriving countryside, in a mutually supportive manner, making both fit to face the challenge of sustainable growth in a changing climate.

At a national level, CPRE's policy is in support road pricing arrangements that reduce motor traffic and provide funding for public transport (CPRE, *Policy Position Statement - Road Transport Demand Management*, 2007). Within London, congestion charging is key to making better use of the urban area and reducing pressure on greenfield sites.

### **Context**

Despite gains following the introduction of congestion charging, congestion in London is worsening, partly due to the extension of the residents' discount. There is a severe squeeze on funding for transport improvements, yet the need to reduce carbon emissions is ever more apparent. This was highlighted earlier this year, to give just one example, by Sir Nicholas Stern's statement that the costs of climate change were twice what he had estimated in the *Stern Report*. Air pollution in London is likely to breach EU limits and needs to be reduced.

It is therefore somewhat surprising, indeed concerning that rather than proposing ways to reduce congestion and carbon emissions and to increase revenue to tackle these, the consultation instead only provides options to do the opposite. Any further consultation must include options, such as those set out below.

### **Concerns about the consultation**

The consultation document completely overlooks the adverse health impact of slowing or reversing the growth in cycling and, to a lesser extent, walking that diluting the CCZ would cause. Reducing the volume of motor traffic is the best way to improve conditions for those on foot or on cycle: see the hierarchies of provision in Table 3.6 of DfT, *Local Transport Note 1/04 (Draft): Policy, Planning and Design for Walking and Cycling*, 2004. Given the rise of obesity, particularly amongst socially disadvantaged groups in London, and related health costs, this is a matter of grave concern.

The consultation document views congestion and capacity only in terms of private motor vehicles, not buses, people trying to cross the road etc. This is not in keeping with the legal requirements under the Network Management Duty contained in s.16 of the Traffic Management Act 2004 which requires regard to be had to all road users including pedestrians. In a city where a low and - according to the 2007 DfT statistics - decreasing proportion of households own motor vehicles, this approach is also inequitable.

## Consultation options

We believe that congestion charging needs to be strengthened rather than diluted. Insofar as Option 3 (modifying the western zone) represents this, we choose this option.

We would only support Option 3a (introduction of an account based payment system) if payment for the western zone were to be separated from the central zone, so as to ensure that there was no financial loss.

We strongly oppose Option 3b (introduction of charge-free period) which would weaken the effects of the congestion charge and could make it more dangerous for children wishing to walk or cycle back home from school. Further it is notable that businesses frequently overestimate the proportion of their customers who arrive by car. See for example research (Sustrans, *Information Sheet LN02 – Shoppers and how they travel*, 2006) shows that shopkeepers estimate as much as double the proportion of shoppers that drive to their shops that actually do in practice.

We strongly oppose Option 3c (increase residents' discount to 100%). Instead the residents' discount should be decreased and the provision of car clubs increased so that car club vehicles are within at most a ten minute walk of all homes within the zones. Many car clubs include the congestion charge within the standard charges. This would reduce car use and congestion, freeing up space for those on foot and cycle: car parking was identified as one of the biggest barriers to improving conditions for cycling: London Cycle Network Annual Report 2007. Finally the residents' discount should only apply to that zone in which people live.

## Other changes

There needs to be greater prioritisation of space efficient traffic, i.e. buses, cycles and those on foot. The Western Congestion Charge Zone has not improved bus journey times: many bus lanes are congested with taxis. The 2007 Taxi Study by the City of London showed that within the City, taxis contain on average 0.85 passengers and that about 15% of the vehicular traffic is empty taxis or PHVs, making them even less efficient in space terms than private cars. Taxis should be banned from travelling along the most congested bus lanes during peak hours (e.g. Strand, Euston Road) plus Oxford St. NB this would not affect the right of taxis to pick up/set down in bus lanes.

Freight consolidation centres, using electric vans and rickshaws for inside the CCZ, should be set up just outside the boundary to help businesses avoid cost of paying the charge while reducing the impact of deliveries and the congestion that they cause.

Introducing a 20mph limit on all but the biggest roads in the CCZ would enable the vehicular traffic to flow better, traffic signals to be timed more efficiently if not removed in many locations, while encouraging further modal shift to walking and cycling.

Given the success of Oyster cards it is now time to no longer accept cash on buses, by rolling out the existing central London restriction on on-board cash fares to TfL buses in the whole GLA area. This will reduce congestion for all road users besides improving bus journey time.

Encouragement should be given to businesses – large and small – to encourage flexible working which reduce the number of employees travelling in rush hour periods.

Steve Whitbread  
Director

October 2008