

## Appendix A: Review of Implementing Cabinet's Decision

This appendix provides review of the implementation of Cabinet's decision in 2015, and in particular the proposed restrictions on taxis using Tottenham Court Road, on the basis of up-to-date information and current circumstances. To this end a re-evaluation of the key aspects of the decision has been undertaken.

1. **Policy overview.** The report to Cabinet dated 8 January 2015 CENV/2014/20 explained the policy background to the West End Project at paragraphs 2.1 – 2.2 as follows:

“Camden's Transport Strategy 2011 (CTS) sets out the future direction for transport in the borough, outlines the challenges that are faced and how these will be addressed. The CTS includes a programme of schemes, including the West End Project, to address key objectives which include improving road safety and air quality, encouraging sustainable healthy travel, developing high quality accessible public spaces and streets and supporting Camden's growth and regeneration.

“The West End Project was prioritised in the [then] CTS as:

- The Tottenham Court Road / Gower Street area is one of the worst ten locations in the borough for collisions with 259 casualties in total in the last three years (01/08/2011 to 31/07/2014), of which 36% involved pedestrians and 27% involved cyclists.
- Tottenham Court Road has one of the worst pollution levels in the borough (along with Euston Road and Finchley Road) for particulate matter and oxides of nitrogen.
- The predicted increase in the number of pedestrians with the opening of Crossrail will make Tottenham Court Road busier than Heathrow airport and the area needs to be safe and welcoming.
- Traffic in the area has reduced by 30% since Charing Cross Road was closed in 2007 (for the Crossrail works) and the Council would like to retain this level of traffic reduction to achieve long term air quality, road safety and public realm benefits.”

- 1.1. The reasons for recommending the implementation of the West End Project (subject to certain amendments set out in Appendix D) were summarised in the report at paragraphs 4.1 and 4.2, as follows:

“The reasons for proceeding as set out below reflect the major policy objectives delivered by the project, taking advantage of the unique opportunity to leverage substantial external investment to improve traffic and public realm across this substantial area. It also reflects the results of the very extensive consultation work, and the support shown. As noted, the scheme would involve compromises and balance, but it would deliver:

- a huge positive impact in the local quality of urban realm,
- a safer and more attractive environment for walking and cycling,
- improved road safety,
- significant benefits for bus users,

- several new areas of high-quality public realm including the first new park in the West End for many decades
- a reduction in exposure to poor air quality
- an innovative approach to managing competing needs for freight in central London
- an opportunity for sustaining local business

“... The proposals are recommended for approval as they meet the objectives of a number of Council strategies as outlined below. Tottenham Court Road is identified as an Opportunity Area for development of jobs, homes and other facilities in the London Plan (GLA, 2008) and the proposals would support that development as well as contributing to several objectives in Camden’s Core Strategy. The proposals also support the Council’s policies in the Camden Transport Strategy to encourage walking, cycling and public transport use and reduce road danger. The proposals meet the objectives of the Mayor of London’s Vision for Cycling in London (GLA, 2013), and the Roads Task Force (TfL, 2013), by providing more space for the increasing number of cyclists, making it safer, transforming the environment for walking, cycling and public transport, and improving the urban realm.”

- 1.2. In April 2019 a new [Camden Transport Strategy \(“CTS”\)](#) was adopted by full Council, following a well-supported public consultation, in response to the Mayor of London’s new transport strategy 2018. Three key themes are at the heart of the Mayor’s strategy. The first is as follows:

**“1. Healthy Streets and healthy people**

Creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates.”

- 1.3. The policies of the Mayor’s strategy are referred to, and adopted, by the CTS. The Mayor’s strategy states this, in relation to car dependency:

**“Reducing car use**

London has made real progress in encouraging people to walk, cycle and use public transport, but across London, cars still make up by far the bulk of road vehicles. Any strategy to make more efficient use of street space must therefore address car use.

Cars are a relatively inefficient means of moving people around. Cars, taxis and PHVs take up nearly half of all the street space in central London, but account for just 13 per cent of the distance travelled. In comparison, buses and coaches take up less than 10 per cent of the street space but account for nearly 40 per cent of distance travelled.”

- 1.4. The CTS sets out an ambitious vision at paragraph 3.1:

*“To work alongside residents and partners in transforming transport and mobility in Camden, enabling and encouraging people to travel sustainably; nurturing healthier lifestyles; creating radically less polluted places; and*

*upgrading the transport network to meet Camden's needs and those of London as a growing capital city"*

- 1.5. The CTS commits, as objective 1, "To transform our streets and places to enable an increase in walking and cycling." A number of policies are set out at paragraph 3.10 which aim to deliver this objective, including policies 1a to 1c as follows:

"The Council will use a road user hierarchy to inform all relevant decisions: walking, cycling and public transport will be prioritised above private vehicle use as follows:

- ~ Pedestrians
- ~ Cyclists
- ~ Public transport/vehicles for people with a disability
- ~ Freight (including loading and unloading)
- ~ Taxis
- ~ Powered two-wheelers (motorcycles) and private cars

"The Council will remove barriers to walking and cycling, ensuring that every transport, place shaping and other relevant schemes improve conditions for pedestrians and cyclists, to create high quality environments that enable modal shift and increase active, healthy travel.

"The Council will change how road space is allocated, including reducing kerbside space for parking/loading provision, and reallocating carriageway space to active, sustainable travel modes, if necessary, to enable and encourage people to walk and cycle, to improve road safety and deliver enhancements to the public realm."

- 1.6. Measure 1f to deliver the above policies is as follows:

"Bid for, and implement if successful, Liveable Neighbourhoods schemes at strategic locations across the Borough to provide transformational area-wide improvements that prioritise walking, cycling and access to public transport – including completion of the 'West End Project' for which funding is already secured."

- 1.7. The CTS commits, as objective 2, "To reduce car ownership and use, and motor traffic levels in Camden." Objective 3 is "To deliver a sustainable transport system and streets that are accessible and inclusive or all". At paragraph 3.25, the CTS states:

"Older people and those with physical and mental disabilities are more reliant on walking, and improvements to the walking environment will also be delivered as part of Objective 1. These groups also make greater use of public transport than other groups, particularly buses. Yet overcrowding and poor accessibility can prevent those most in need from using the network. Camden will also investigate opportunities to encourage a shift from public transport to walking and cycling where appropriate to help reduce overcrowding."

- 1.8. The CTS commits, as objective 4, “To substantially reduce all road casualties in Camden and progress towards zero killed and seriously injured (KSI) casualties.”
- 1.9. Objective 5 is “To reduce and mitigate the impact of transport-based emissions and noise in Camden.” At paragraph 3.39 the CTS states that Camden fully supports the introduction of the Ultra Low Emission Zone (“ULEZ”) and its extension to the north and south circulars (scheduled for October 2021). At paragraph 3.43 the CTS states:
- “The lowest emission forms of transport are walking and cycling. As well as helping to mitigate toxic pollution, they also generate no carbon emissions (other than in the manufacture of bicycles/associated equipment). These modes also contribute to delivering other objectives in this Strategy and more widely, and therefore remain the Council’s priority.”
- 1.10. The CTS makes specific reference to delivering the West End Project (see above). Some further references are set out below. At paragraph 1.10, the CTS states:
- “In this plan, we commit to working with multiple partners to assist in, or deliver ourselves, projects that will transform the borough’s transport infrastructure. This includes fulfilling existing schemes in the short term, such as the West End Project ...”
- 1.11. At paragraph 1.12, the CTS states:
- “The opening of Crossrail services in 2019 (the Elizabeth Line) will bring more than 1.5 million extra people within 45 minutes of Central London, many of whom will come into Camden: it is estimated that the number of people entering and exiting Tottenham Court Road station on a daily basis will have increased by 81% by 2021 (compared to before the new station opens). In responding to that challenge, in March 2018, work began on site on Camden’s £35m West End Project (WEP) around Tottenham Court Road, Gower Street, Prince’s Circus and St Giles. The project will transform this part of the West End, boost business, and prepare for the increase in passenger numbers, helping to realise the economic and regeneration benefits that Crossrail will bring.”
- 1.12. The Elizabeth Line is now expected to open in 2022: [https://2577f60fe192df40d16a-ab656259048fb93837ecc0ecbcf0c557.ssl.cf3.rackcdn.com/assets/library/document/original/london\\_assembly\\_update\\_february\\_2021\\_redacted.pdf](https://2577f60fe192df40d16a-ab656259048fb93837ecc0ecbcf0c557.ssl.cf3.rackcdn.com/assets/library/document/original/london_assembly_update_february_2021_redacted.pdf)
- 1.13. The West End Project is also referred to in measure 7h, as contributing towards the delivery of objective 7, namely; to ensure economic growth and regeneration is supported by, and supports, a sustainable transport network, as follows:

“Deliver the West End Project to support Crossrail and the growth in homes and jobs in the West End, particularly to provide safe, attractive and accessible streets around the station at Tottenham Court Road.”

2. **Traffic levels.** The below analysis considers traffic levels and any material changes that may have occurred in this regard over the period 2015 (when the West End Project improvements were approved by Cabinet), and the current date in 2021.
  - 2.1. **2015:** The proposals approved by Cabinet would prohibit traffic except buses and pedal cycles from using the full length of Tottenham Court Road from Monday to Saturday, 8am-7pm, subject to a review 12 months after implementation (see Appendix D to the report, paragraph 18). When restrictions applied, prohibited vehicles would have access to the unrestricted sections, which account for 60% of the whole street. At all other times including the evening, early morning and all-day Sundays, general motor traffic would have unrestricted access to the whole street benefitting the night-time economy and assisting safer travel home at night.
  - 2.2. With regard to taxis in particular, the report to Cabinet stated at paragraph 4.4 that:

“Permitting taxis to use the full length of Tottenham Court Road (Option 2) is not recommended as this would increase the volume of traffic on Tottenham Court Road by up to 24% compared to option 1, increase levels of pollution and road danger and would therefore worsen conditions for walking and cycling and reduce journey time benefits for buses.”
  - 2.3. Further commentary in relation to Option 2 was set out in the appendices, in particular at Appendix A, in the table below 8.40.
  - 2.4. It was stated that the restrictions on taxis would have no impact on their ability to serve a number of key destinations on Tottenham Court Road, including the Dominion Theatre, Habitat / Heals, Goodge Street Underground station, the Grafton Hotel, and Warren Street Underground station. In addition, the proposals would also not impact on taxi access to other key destinations in the area including UCLH (and other medical treatment centres), UCL, British Museum, Bedford Square, Charlotte Street, St Giles Hotel, MyHotel, YMCA and Shaftesbury Theatre.
  - 2.5. Detailed traffic modelling was carried out to assess the impact of restricting taxis on Tottenham Court Road on central London (including side streets). The modelling did not show wider displacement across central London. In terms of the amount of traffic on side streets, the modelling showed that there was no significant difference between allowing taxis to use the full length of Tottenham Court Road and restricting their use of the road. However, restricting taxis on Tottenham Court Road was shown to reduce traffic levels on the road by up to 160 vehicles an hour (a 24% reduction compared to allowing taxis full access).

- 2.6. The Cabinet report of 2015 reasoned that the vast majority of people accessing Tottenham Court Road did so by London Underground and bus services – not by taxi. Allowing taxis to use Tottenham Court Road would increase traffic congestion, worsen air quality and worsen road safety.
- 2.7. **2020:** The potential benefits of the restrictions outlined above at paragraph 1.1 that applied in 2015 continue apply. In addition to this, they have renewed relevance in terms of the objectives and policies in the CTS (see above), which was updated and adopted by full Council in April 2019.
- 2.8. Screenline counts of traffic across key roads in the West End Project area have been in place since 2006. Data from these are presented in the tables that follow.
- 2.9. **Table 1: Screenline data showing car counts across key streets in the West End Project area, 2011-2019**

	CAR								
	2011	2012	2013	2014	2015	2016	2017	2018	2019
<b>Period of interest (12 hour counts: 7.00-19.00)</b>									
<b>Tottenham Court Road (south of Maple Street)</b>	2,797	2,994	2,797	2,556	2,358	2,245	2,170	2,420	1,078
<b>Huntley Street (south of University Street)</b>	197	324	444	491	439	325	244	198	255
<b>Gower Street (south of University Street)</b>	4,773	4,755	4,044	4,126	3,840	4,789	4,907	5,910	4,263

- 2.10. **Table 2: Screenline data showing taxi counts across key streets in the West End Project area, 2011-2019**

	TAXI								
	2011	2012	2013	2014	2015	2016	2017	2018	2019
<b>Period of interest (12 hour counts: 7.00-19.00)</b>									
<b>Tottenham Court Road (south of Maple Street)</b>	2,552	2,418	2,447	2,192	1,398	1,211	1,861	1,752	509
<b>Huntley Street (south of University Street)</b>	44	78	75	75	33	56	32	37	20
<b>Gower Street (south of University Street)</b>	3,345	3,141	3,117	3,105	2,361	2,842	2,631	2,320	1,400

2.11. Table 3: Screenline data showing pedal cycle counts across key streets in the West End Project area, 2011-2019

	CYCLE								
	2011	2012	2013	2014	2015	2016	2017	2018	2019
Period of interest (12 hour counts: 7.00-19.00)									
Tottenham Court Road (south of Maple Street)	1,179	1,240	803	943	928	784	1,213	1,456	2,246
Huntley Street (south of University Street)	1,072	1,170	916	980	1,061	791	1,021	1,136	936
Gower Street (south of University Street)	1,551	1,390	1,087	1,224	1,401	1,036	1,417	1,494	1,156

2.12. Table 4: Screenline data showing all motor traffic counts across key streets in the West End Project area, 2011-2019

	ALL MOTOR TRAFFIC								
	2011	2012	2013	2014	2015	2016	2017	2018	2019
Period of interest (12 hour counts: 7.00-19.00)									
Tottenham Court Road (south of Maple Street)	9,231	9,487	9,145	8,379	7,056	6,503	7,008	7,260	4,113
Huntley Street (south of University Street)	483	754	816	864	679	611	481	367	407
Gower Street (south of University Street)	12,572	12,111	11,152	11,240	9,637	11,915	11,962	12,720	9,413

2.13. Table 5: Screenline data showing all traffic counts across key streets in the West End Project area, 2011-2019

	ALL TRAFFIC								
	2011	2012	2013	2014	2015	2016	2017	2018	2019
Period of interest (12 hour counts: 7.00-19.00)									
Tottenham Court Road (south of Maple Street)	10,410	10,727	9,948	9,322	7,984	7,287	8,221	8,716	6,359
Huntley Street (south of University Street)	1,555	1,924	1,732	1,844	1,740	1,402	1,502	1,503	1,343
Gower Street (south of University Street)	14,123	13,501	12,239	12,464	11,038	12,951	13,379	14,214	10,569

2.14. The data presented above reveals some trends worth highlighting for the purposes of this report:

- Car usage within the area was relatively stable over the period 2015-2018. It even increased on Gower Street over this period. Following the closure in

April 2019 of two out of three lanes on Tottenham Court Road for West End Project highway construction works (the southbound lane being bus only and the northbound for general traffic), the numbers dropped significantly.<sup>1</sup>

- Taxi usage has in general decreased since 2014 but the period 2015-2017 on Gower Street and 2016-2018 on Tottenham Court Road saw increases. In 2017-2018, taxis represented at least 20% of all traffic on Tottenham Court Road. Following the temporary changes in April 2019, the numbers dropped significantly. However, these are temporary measures to facilitate works, so that 2017-2018 represents a more accurate picture of likely taxi numbers, once the effect of Covid-19 restrictions has passed, on the assumption the scheme was not implemented.
- Cycle usage has been on a largely upward trend since 2014. Following the temporary changes made in April 2019, the numbers increased significantly.

2.15. The screenline data shows that (despite the temporary changes made to Tottenham Court Road in April 2019 and the launch of ULEZ over the same period) the numbers of motor vehicles still using the area (and Tottenham Court Road in particular) remain high and as such the benefits to be achieved by reducing these movements are still considerable. Additionally, if anything, the policy commitments adopted by LB Camden in the intervening time make them more relevant than ever.

3. **Road Safety.** The below analysis considers road safety and any relevant changes over the period 2015-2021.

3.1. **2015:** The West End Project was conceived on the basis of a clear commitment by LB Camden to the prioritisation of sustainable transport, i.e. walking, cycling and public transport. The Camden Transport Strategy of the time established objectives and targets to improve road safety for pedestrians and cyclists and increase levels of walking and cycling in the borough. Providing a safe environment is crucial to enabling walking and cycling as well as achieving these targets, particularly for new cyclists, for whom the perception of safety is a major barrier.

3.2. The Cabinet report of 2015 at Appendix A referred to a study by the Royal Society for the Prevention of Accidents which demonstrated a clear link between the amount of traffic on a street and the number of casualties on it (Delivering Accident Prevention at local level in the new public health system, RoSPA, 2013). As a result, it would be expected that allowing taxis to use the whole length of Tottenham Court Road would lead to an increase in casualties, particularly involving pedestrians and cyclists. Additionally, the Mayor's Cycle Safety Action Plan (2014) showed that taxis and private hire vehicles were involved in a large number of collisions with cyclists when they are killed and seriously injured, compared to the number of taxis and private hire vehicles on

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<sup>1</sup> It is unlikely that this decrease is mainly attributable to the launch of ULEZ in April 2019: TfL estimated the reduction in traffic flows in central London in May and September 2019 at 3-9%.



the road, with a ratio of involvement to proportion of traffic of 4.0. The plan noted that, where the ratio is above 1, these modes are overrepresented in casualty statistics. This means that they are involved in a large number of collisions resulting in a cyclist killed or seriously injured *relative to their traffic share* – with taxis and private hire vehicles having the highest involvement relative to their share. While fatalities more commonly involve Heavy Goods Vehicles, taxis and private hire vehicles are more frequently involved in casualties categorised as ‘serious’. [It is recognised that the above collision data did not distinguish between London taxis and private hire vehicles.]

3.3. Based on the above, it was therefore considered that allowing unrestricted taxi access on Tottenham Court Road would increase the potential for conflict with cyclists and the likelihood of an increase in serious casualties which would undermine Council objectives to encourage cycling and to improve road safety.

3.4. **2020:** At paragraph 2.60 of the CTS (2019) it is stated that: “Reducing road danger and risk is fundamental to creating streets where more people can switch to sustainable modes, helping realise the potential for walking and cycling and achieving the targets of this strategy.” It also refers to the Mayor’s Transport Strategy which adopts a Vision Zero approach to road safety, working towards the elimination of road traffic deaths and serious injuries by 2041, by reducing the dominance of motor vehicles on London’s streets and the risks that this presents.

3.5. The Mayor’s Vision Zero action plan, developed under the Mayor’s transport strategy 2018, states that road danger is a significant barrier to active travel and that:

- The main deterrent to people taking up cycling, cycling more often, or being willing to let their children walk or cycle unaccompanied in London, is the fear of traffic collisions
- Improved safety is also cited by Londoners as one of the main motivators for walking more

And it identifies as a key source of road danger the danger posed by the vehicles with the greatest risk: HGVs, buses, taxis and private hire vehicles.

3.6. The Vision Zero action plan also states at section 5.3 that:

“Analysis shows that taxis and private hire vehicles are 1.4 times more likely than a car, per vehicle kilometre travelled, to be involved in a collision with someone walking or cycling.”<sup>2</sup>

Further data provided in Chapter 5 shows that:

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<sup>2</sup> Provisional figures from the MPS’s new data recording system indicated that the number of people injured in licensed private hire vehicles (not taxis) was in proportion to their share of traffic. It would follow that this was a lower proportion than for taxis.

- Taxis and private hire vehicles are 1.04 times more likely to be involved in a collision resulting in fatality or serious injury to a pedestrian relative to their share of traffic.
- Taxis and private hire vehicles are 1.68 times more likely to be involved in a collision resulting in fatality or serious injury to a cyclist relative to their share of traffic.

3.7. Another relevant policy document is the Road Safety Action Plan (RSAP) developed by LB Camden in 2019, which incorporates the policies and measures within the CTS for improving road safety into a single, clear, organised programme. The table below highlights the commitments of LB Camden in terms of reducing traffic accidents.

**Table 5: Road Safety Action Plan Targets (Mayor’s Transport Strategy and Camden Transport Strategy).**

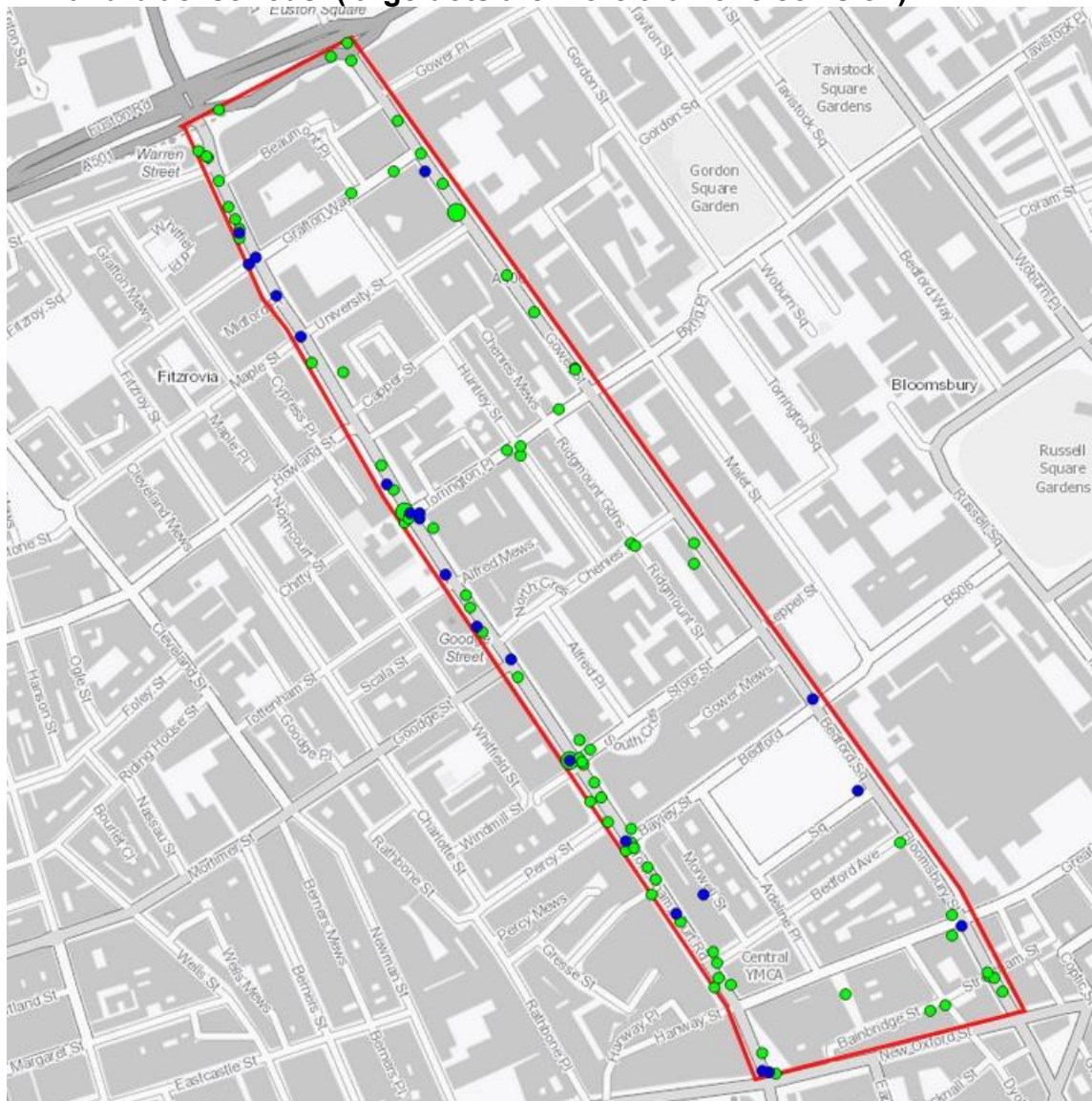
MTS Target	CTS Target
All deaths and serious injuries from road collisions to be eliminated from London’s streets by 2041	To eliminate all Killed and Seriously Injured (KSI) casualties. Targets: 87 KSI by 2022, 58 by 2030, zero by 2041.
	To substantially reduce all road traffic casualties in Camden and progress towards zero Killed and Seriously Injured casualties
80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041	85% of trips in the Borough are already made by sustainable modes. To support the Mayor’s London-wide goal of 80% of all trips being made by these modes by 2041, Camden’s share is required to be higher: 88% by 2021 and 93% by 2041

- 3.8. As part of the RSAP, to assist with prioritising locations for road safety interventions, a borough-wide Road Safety Audit was commissioned in March 2018. Informed by detailed analysis of collision data specific to Camden’s road network, the audit prioritises sections of the network. It also involved a focus on Vulnerable Road Users (VRUs), such as pedestrians and pedal cyclists. The significance of this is demonstrated by a clear reference to the West End Project as data analysis carried out within the plan identifies a “link” at Howland Street (Tottenham Court Road to Cleveland Street). A “link” is defined as an area of concern in terms of the number of collisions involving a VRU per kilometre. In addition to this, the West End Project as a whole is identified as a ‘priority location’ for reducing the dominance of motor traffic.
- 3.9. The Cycling Action Plan (CAP) was also developed in 2019. This document outlines the borough-wide cycle network and sets out LB Camden’s intentions to enable increased, safe cycling levels throughout Camden. The development commitment specifically identifies Tottenham Court Road and the West End Project area as a fundamental part of the primary and secondary cycle network routes.
- 3.10. The most recent data collision data available is for the 3-year period from 01-08-2017 to 31-07-2020. Over this period there were 107 casualties from 103 collisions.

3.11. Table 6: Collisions in the West End Project area, 2017-2020

Mode	Serious	Slight	Grand Total
Pedestrian	13	28	41
Pedal cycle	6	19	25
Motorcycle 50cc and under		1	1
Motorcycle 125cc and under	1	10	11
Motorcycle over 125cc and up to 500cc	1	3	4
Motorcycle over 500cc	1	5	6
Car		7	7
Taxi/Private hire car		2	2
Van / Goods 3.5 tonnes mgw or under		1	1
London Bus (Pre-2017)		9	9
<b>Grand Total</b>	<b>22</b>	<b>85</b>	<b>107</b>

3.12. Figure 1: A plot of the collisions tabled above. Green represents 'slight' and blue 'serious' (large dots are more than one collision)



3.13. **Table 6: Breakdown of latest collision data for the West End Project area. Left shows vulnerable road users (pedestrians, pedal cycles and motorcycles), Right shows all mode users.**

Date	Serious	Slight	Grand Total
<b>2017</b>			
Aug	1		1
Sep		1	1
Oct		2	2
Nov	1	2	3
Dec		1	1
<b>2018</b>			
Jan	1	2	3
Feb		4	4
Mar	1		1
May	2	1	3
Jun	1	2	3
Jul		1	1
Aug	2	2	4
Sep	1	2	3
Oct		1	1
Nov		2	2
Dec		2	2
<b>2019</b>			
Jan		2	2
Feb		2	2
Mar	2	3	5
Apr		3	3
May		1	1
Jun	2	4	6
Jul	1	3	4
Aug	3	1	4
Sep	1	4	5
Oct		2	2
Nov		4	4
Dec	1	3	4
<b>2020</b>			
Jan		1	1
Feb	1	2	3
Mar		3	3
May	1		1
Jun		2	2
Jul		1	1
<b>Grand Total</b>	<b>22</b>	<b>66</b>	<b>88</b>

Date	Serious	Slight	Grand Total
<b>2017</b>			
Aug	1		1
Sep		2	2
Oct		2	2
Nov	1	2	3
Dec		3	3
<b>2018</b>			
Jan	1	4	5
Feb		4	4
Mar	1	1	2
May	2	1	3
Jun	1	3	4
Jul		1	1
Aug	2	2	4
Sep	1	2	3
Oct		3	3
Nov		3	3
Dec		2	2
<b>2019</b>			
Jan		5	5
Feb		3	3
Mar	2	5	7
Apr		3	3
May		1	1
Jun	2	5	7
Jul	1	4	5
Aug	3	1	4
Sep	1	4	5
Oct		2	2
Nov		5	5
Dec	1	3	4
<b>2020</b>			
Jan		1	1
Feb	1	2	3
Mar		3	3
May	1		1
Jun		2	2
Jul		1	1
<b>Grand Total</b>	<b>22</b>	<b>85</b>	<b>107</b>

- 3.14. As illustrated by the above data, the number of collisions within the West End Project area remains high, particularly among vulnerable road users. Pedestrians and pedal cycles make up the lion's share of serious injuries. There remains, therefore, a clear benefit to implementing the restrictions which would help reduce traffic numbers and therefore collision rates in the area. The current policy objectives of LB Camden set out above also strongly support this.
4. **Air Quality.** The below analysis considers air quality and any relevant changes that have occurred in this regard over the period 2015-2021.
- 4.1. **2015:** It was noted in the Cabinet report at Appendix A that LB Camden has a responsibility under the Environment Act 1995 to reduce all pollutants. Despite reductions in the majority of the pollutants, levels of PM10 and NO2 were found to exceed the national air quality standards and objectives in some areas of London. In 2011, Tottenham Court Road was recorded as one of the worst sites in the borough (after Euston Road) for NO2 concentrations.
- 4.2. Road transport is the dominant source of PM10 emissions in London, contributing 79%, with exhaust emission and tyre and brake wear and dust from road surfaces being the main factors. Particulate matters are most associated with mortality and it is estimated that over 4,000 Londoners die prematurely as a result of long-term exposure to these particles (Improving the Health of Londoners, Transport Action Plan, TfL, 2014). There is a specific indicator (indicator 3.01) in the Public Health Outcomes Monitoring Framework for mortality due to PM2.5 and which Camden has to report against. Data shows that the proportion of deaths attributable to PM2.5 in the borough in 2012 was 7.3%, a reduction compared to 2011 and 2010 (7.9% and 7.7% respectively) but higher than the London average of 6.6% and the England average of 5.1% (2012 figures).
- 4.3. TfL's Health Safety and Environment Report 2012/13 reported that taxis and private hire vehicles (PHVs) accounted for 78% of PM10 of all TfL fleet emissions, and that taxis and PHVs emitted a total of 102.5 tonnes compared to 18.39 tonnes for buses.
- 4.4. Road transport and heating systems are the main sources of NOx (Air Quality in Camden: A guide for Public Health officials, Greater London Authority, 2012). NOx is primarily made up of two pollutants – nitric oxide (NO) and nitrogen dioxide (NO2). NO2 is of most concern due to its impact on health. However, NO easily converts to NO2 in the air, so to reduce concentrations of NO2 it is essential to control emissions of NO.
- 4.5. Levels of NO2 in London continued to exceed legally binding limits, for which London was being threatened with a Euro 350 million fine. Cars and domestic gas are the biggest contributors to total NO2 tonnage for Greater London (GLA, 2012). A comparison between buses and taxis showed the contribution of buses to total tonnage in London was double that for taxis. TfL's Health and Safety Report (2012-13) reported that buses contributed over 5,000 tonnes of NOx



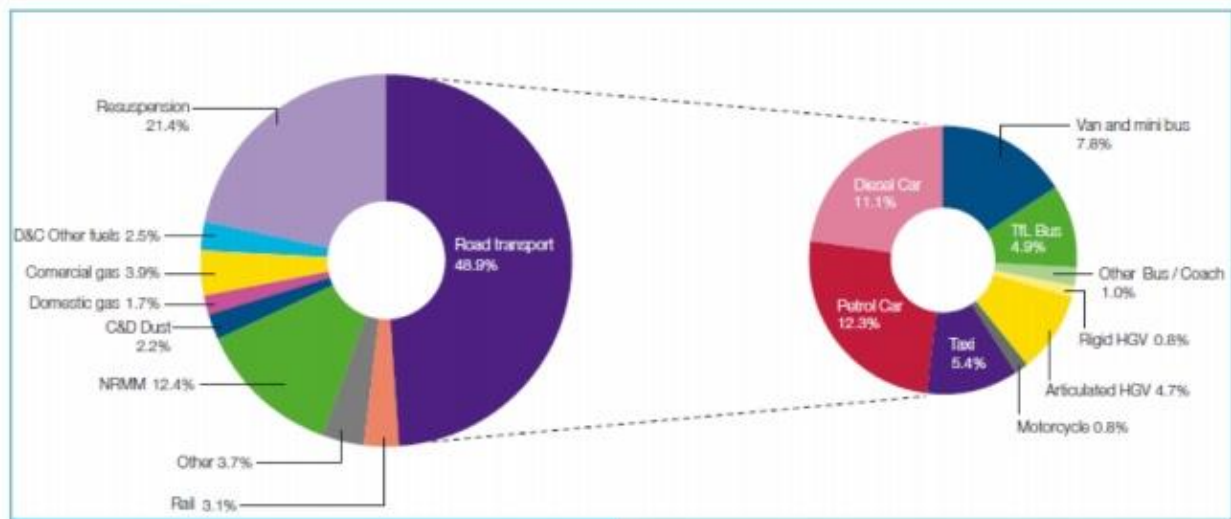
compared to 2,000 tonnes for taxis. However, when the data was assessed per passenger km on a site-specific basis, across the fleet, taxis emitted more PM than buses. For NO<sub>x</sub> and CO<sub>2</sub>, all types of taxi (Euro III, IV and V) emitted significantly more per passenger km than buses. This suggested that allowing taxis unrestricted access into Tottenham Court Road would reduce air quality compared to the consultation proposal.

- 4.6. **2020:** The commitments to improving air quality in the borough and indeed nationally have progressed greatly since 2015, with increased emphasis and stronger commitments made to its improvement.
- 4.7. Like many London boroughs, Camden has typically been in breach of the national air quality objective for NO<sub>2</sub>. In January 2018, Camden became the first London borough to formally adopt the World Health Organization’s (WHO) air quality guidelines. The WHO has campaigned for governments and authorities around the world to adopt strict targets for air quality. Based upon scientific evidence of the health impacts of air pollution, the WHO air quality guidelines are intended to support and drive actions in a local or regional context. The WHO air quality guidelines for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> and the corresponding UK national air quality objectives are shown in Table 2.
- 4.8. **Table 2: UK national air quality objectives and WHO air quality guidelines for annual mean concentration of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.**

Pollutant	UK national air quality objectives	WHO air quality guidelines
NO <sub>2</sub>	40µg/m <sup>3</sup> (from 1 January 2006)	40µg/m <sup>3</sup>
PM <sub>10</sub>	40µg/m <sup>3</sup> (from 1 January 2005)	20µg/m <sup>3</sup>
PM <sub>2.5</sub>	25µg/m <sup>3</sup> (from 1 January 2021)	10µg/m <sup>3</sup>

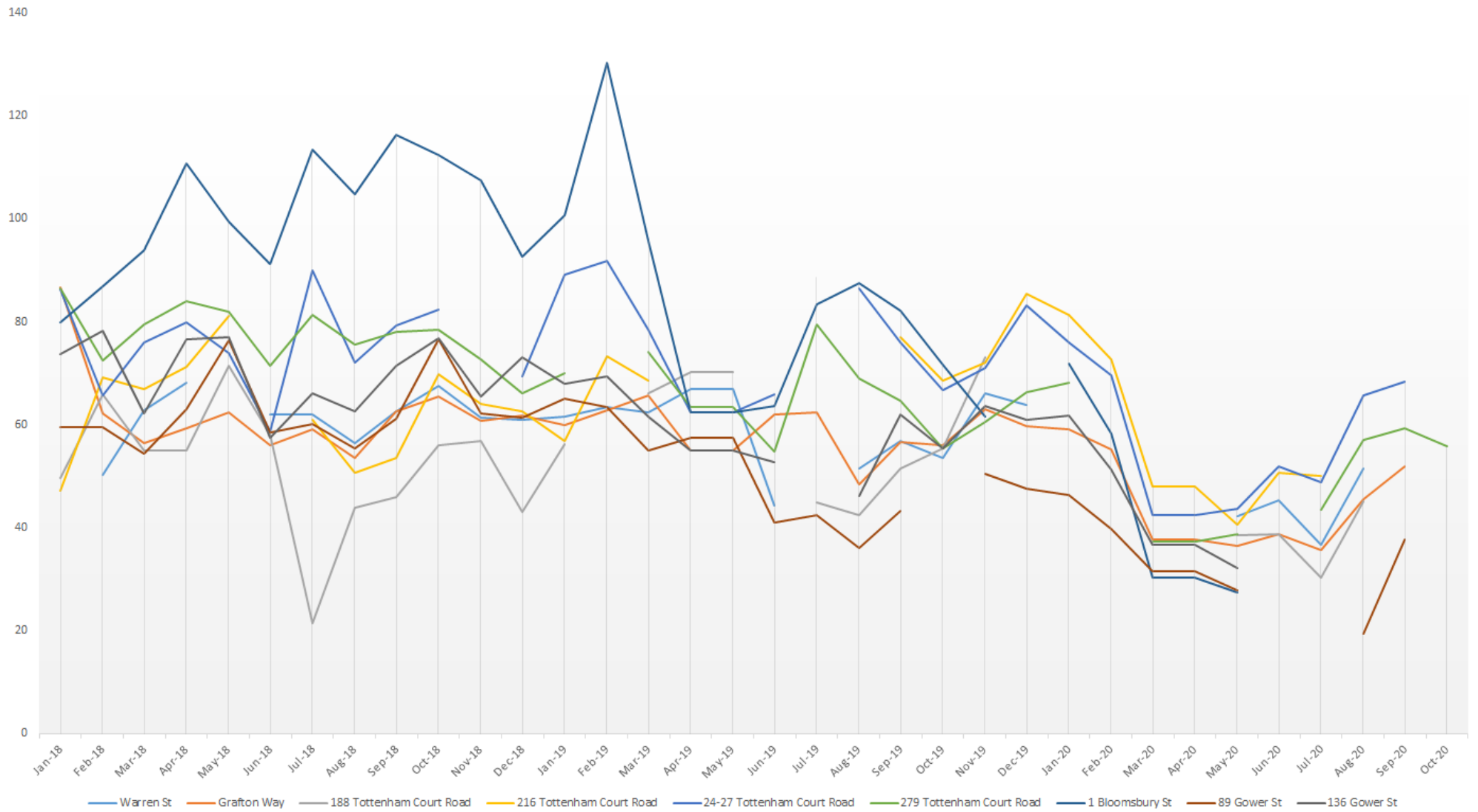
- 4.9. As noted above, the vision of the CTS (2019) is *enabling and encouraging people to travel sustainably; nurturing healthier lifestyles; creating radically less polluted places* and this has a considerable influence on its objectives and policies set out above. For example, at paragraph 3.43 the CTS reaffirms LB Camden’s commitment to walking and cycling as the lowest emission forms of transport.
- 4.10. The Camden Clean Air Action Plan (CCAAP) 2019-2022 records that transport emissions account for approximately 50% of Camden’s NO<sub>2</sub> and PM<sub>10</sub> emissions. The document encourages a shift to more sustainable forms of transport such as walking, cycling and ultra-low emission vehicles (such as electric). Reducing transport emissions is therefore crucial and one key goal of the CCAAP is improving walking and cycling infrastructure.

#### 4.11. Figure 2: Sources of PM10 in Camden (2016)



- 4.12. Camden 2025, which sets out the community’s vision for Camden by 2025 puts air quality as a key area of focus. Within it there is a call to action which states that “no one in Camden should experience poor health as a result of the air they breathe.”
- 4.13. The restrictions approved in 2015 were predicted to be ‘substantially beneficial’ to the overall impacts on pollutant levels in the area, according to air quality modelling produced by REC in 2018, at Appendix B. However, this report must now be viewed in the light of more recent information and developments.
- 4.14. TfL’s Health Safety and Environment Report 2019/20 reported that the launch of ULEZ in 2019 had led to a 37% reduction in NOx levels within the zone within the first 10 months of its operation. In addition, TfL noted its work to reduce bus emissions and to remove the most polluting taxis from London’s roads had helped to achieve significant air quality improvements. Since January 2018 TfL has only issued new licences to zero-emission capable taxis, with over 3,400 estimated to be on London’s roads at the date of the report.
- 4.15. Air quality monitoring has been in place across the West End Project area since 2018 (when construction began). The results in respect of NO2 levels are illustrated in the graph on the following page.

WEP Air Quality Monitoring - Key Sites (monthly average -  $\mu\text{g m}^{-3}$ )





- 4.16. The above data indicates that in some locations positive changes have resulted from the implementation of the West End Project thus far, such as reducing Tottenham Court Road and Gower and Bloomsbury Streets from three, down to two lanes of traffic. However, prior to the impact of Covid-19, the vast majority of the above readings were in excess of the national air quality objective and the WHO guideline of 40µg/m<sup>3</sup> NO<sub>2</sub>, to which LB Camden has committed.
- 4.17. Officers note LB Camden's significant policy commitments in relation to improving air quality, the progress that has been made to date in the reduction of air pollution in the area, including the introduction of ULEZ, and also TfL's work to reduce emissions, specifically from taxis/buses, and conclude that implementing the restrictions would further contribute towards the improvement of air quality in the area and the achievement of LB Camden's air quality policy commitments.

5. **Accessibility for those with mobility impairments.** The below analysis considers any new information in relation to accessibility for those with mobility impairments.

- 5.1. **2015:** Prior to Cabinet approval, an Equality Impact Assessment (EqIA) was completed for the West End Project. The outcome of the EqIA was summarised at paragraph 5.12 of the report, as follows:

"The impact on protected groups, including in relation to age and disability, of the proposals and in particular of restricting taxis from using the whole length of Tottenham Court Road, 8am to 7pm, Monday to Saturday has been assessed and officers are of the view that the positive impacts of the scheme outweigh the negative impacts. Mitigation measures have been recommended as part of the amendments to the proposals, such as providing additional taxi ranks on side streets, more seating on Tottenham Court Road, and more Blue Badge disabled parking and pay and display parking in the vicinity of the hospital."

- 5.2. These issues were further considered at Appendix A to the Cabinet report. To address concerns about accessibility for people with reduced mobility, certain commitments were made. For example, as originally designed the furthest distance on Tottenham Court Road that someone would have to walk (or travel by wheelchair) to access a taxi would be 60 metres (half of the distance between Great Russell Street and Stephen Street). Guidelines for Inclusive Mobility suggest that resting points should be provided at a spacing of 50 metres. Having examined the spacing of proposed seating, including that in new and existing public spaces and in bus shelters, it was proposed that additional seating be provided between Store Street and Goodge Street. This would ensure that in the sections of Tottenham Court Road that would be bus and cycle only, there would be opportunities for people with mobility impairments to stop to rest at a spacing of approximately 50m.

- 5.3. Appendix A stated that it was understood that a very small proportion of older and disabled people used taxis; for cost reasons they are far more likely to use bus services. For evidence of this, 9.3 million public transport trips were made by Camden residents with an older person's freedom pass in 2012/13. 76% of these were made by bus over other forms of public transport. For disabled people under the age of 64, 2.8 million public transport trips were made by Camden residents registered for the pass, of which 79% were made by bus. The bus is clearly an important transport mode for older and disabled people and improvements to bus stop accessibility, bus journey times and reliability will provide significant benefits for people that rely on them.
- 5.4. According to Taxicard usage data to date for 2014/15, the average number of trips made per month by Camden residents was 4,023, making the number of trips per year approximately 48,000. The volume of trips made by Taxicard users was far lower than the number of trips made by freedom pass users (the ratio was 1:200) and therefore although the lack of access to some parts of Tottenham Court Road to taxis might cause problems for some disabled and older people, the improvements to bus services would benefit a far larger number of disabled and older people.
- 5.5. For those people, including disabled people, who require a taxi, the number of taxi ranks was to be increased. In addition, taxis would still be able to access 60% of Tottenham Court Road (the unrestricted sections), and for the remaining 40% (where taxis would be restricted), taxis could stop close to a junction of the nearest side street with Tottenham Court Road, not more than 50m away, to pick up and set down passengers. At all other times including the evening, early morning and all-day Sundays, general motor traffic would have unrestricted access to the whole street benefitting the night-time economy and assisting safer travel home at night.
- 5.6. **2020:** The effect of excluding taxis from using the full length of Tottenham Court Road during the restricted hours has been mitigated by discussions with the taxi trade in 2015/2016, resulting in agreement to introduce taxi ranks in various side streets leading to Tottenham Court Road that are sited as close as possible to their junctions with Tottenham Court Road itself. The taxi rank at the southern end is retained and is outside of the restriction. Access to other short sections is also maintained, for example, access to the rank in the central section between Chenies and Store street, which was requested by the taxi trade to facilitate access to the Heals/Habitat store. TfL are also installing a taxi charging point on the rank in Warren Street adjacent to Tottenham Court Road.
- 5.7. By way of updated statistics, the latest available Taxicard usage is for 2017/18. These represent a yearly trip number of 63,860 in Camden, up from 48,000. Public transport trips by Camden residents with a freedom pass are 11.8 million, up from 9.3 million.
- 5.8. Chapter 2 of the CTS (2019) discusses the modes most frequently used by people with a disability in London. Walking is the most used mode, with 31% of trips undertaken on foot by disabled people which is equal to those without a disability. Bus services (including trams) is the second most prevalent mode at

22%, this is much higher than those who are not disabled (14%). At 15%, the proportion of disabled people who cycle is also similar to the able-bodied population. The number of trips driven are actually lower than those without a disability at 14% and 23% respectively, and trips as a passenger are also about the same as able-bodied people. In addition, only 3% of trips made by disabled people are by taxi. Prioritising walking, cycling and public transport will therefore also support those with a disability.

- 5.9. Another useful tool to represent the accessibility of the West End Project is the Public Transport Access Level (PTAL). PTAL is a measure of connectivity by public transport, which has been used in various planning processes in London for many years. For any selected place, PTAL suggests how well the place is connected to public transport services (TfL, Connectivity Assessment Guide, 2015). The PTAL levels throughout the West End Project area are at the highest level (6B), representing the areas of best connectivity.
- 5.10. Step-free access is available for disabled and less mobile users at Tottenham Court Road and Euston Square stations, situated at either end of the West End Project area.
- 5.11. Objections in response to the Notice of Proposals were received from the London Taxi Driver's Association dated May 2020 and from United Cabbies Group dated 28 June 2020. These are at Appendix D to the report.
- 5.12. The LTDA drew attention to the fact that London Taxis are fundamentally distinctive to Private Hire Vehicles and are a crucial element of London's public transport mix. They pointed out that businesses along the road will be less accessible as a result of the changes – particularly those that sell large items which require transportation to be moved (the letter also mentions luggage). They pointed out that road traffic accident data did not differentiate between PHVs generally and black cabs. (This is not correct in respect of collision data collected by MPS since 2018.) Reliance was placed on the absolute number of accidents involving taxis (not the likelihood per km travelled of being involved in a collision) to argue that taxis are comparatively safe. They submitted that the comparatively low number of taxis likely to use the street (160 per hour) would not compromise safety or increase congestion on the street and would also have little impact on bus journey times. Further, they argued that the scheme does not take into account the needs of those with restricted mobility or who are elderly, who require the ability to use a taxi, the only form of transport on London's roads which are fully accessible, as well as guide-dog friendly. A specific point was raised about patients leaving UCH not being able to easily hail a taxi (A new taxi rank has been provided on Grafton way, there is a rank within the curtilage of the hospital and they could however be picked up by a pre-booked taxi). They also relied on the requirement since January 2018 for taxis newly licensed to be zero emission capable ("ZEC") and the Mayor's ambition for all London taxis to be ZEC by 2033. Reference was also made to alleged flaws in the original consultation in 2014 (permission was refused to LTDA to bring a judicial review on this basis after a hearing on 1 July 2015).

- 5.13. UCG argued that there is low public confidence in safely travelling on buses currently and disabled and vulnerable passengers are at a serious disadvantage with the reduction in capacity on the tube and bus network. They made the point that taxis are permitted in bus lanes (under TfL's bus lane policy). They asked: How will a taxi take a passenger following treatment from Macmillan Cancer Centre? (The Macmillan Cancer centre is in Huntley street. The road outside the centre has not changed under this scheme.) They also asked: For someone leaving the maternity entrance on Grafton Way who wishes to travel north west how do you envisage this being possible? (Northwest travel from the maternity hospital has not changed. The route would remain from the maternity hospital along Grafton Way, turn right into Tottenham Court Road and continue north into Hampstead Road.) UCAG also relied on the distinctiveness of taxis, their regulatory regime and the market in which they operate and submitted that if a public authority prohibits black cabs from travelling in a bus lane, it is guilty of failing to take steps "*to meet the needs of persons who share a relevant protected characteristic [e.g. the elderly and the disabled] that are different from the needs of persons who do not share it*", contrary to its statutory duty under section 149(3) of the Equality Act 2010 (see the legal commentary within the report at 6.5-6.8).
- 5.14. It is important to take into account The Inclusive Transport Strategy published by the Department for Transport in July 2018. This states at paragraph 4.17 that taxis "play an essential role in enabling disabled people to complete door-to-door journeys where other forms of transport may not be available or accessible". Prohibiting motor cars including private hire vehicles and taxis from using the full length of Tottenham Court Road during the restricted times potentially has a negative effect on some of the elderly and disabled, who have mobility impairments and who rely on especially on taxis, but also PHVs and private cars, to make door-to-door journeys, and could not reasonably be expected to cycle, walk or use public transport to gain access to shops and other facilities on Tottenham Court Road. As stated above, efforts have been made to mitigate these potential negative effects. It would be possible to mitigate these effects further or perhaps remove them altogether by permitting taxis to travel the full length of Tottenham Court Road during the restricted hours. However, in officers' assessment, any remaining negative effects are outweighed by the benefits of the scheme, bearing in mind in particular that the restrictions are in accordance with the road user hierarchy in Policy 1.a and other key policy commitments in the CTS, that permitting taxis to use the full length of Tottenham Court Road would increase the volume of traffic on Tottenham Court Road by around 25%, increase levels of air pollution and road danger and would therefore worsen conditions for walking and cycling and reduce journey time benefits for buses. In officers' assessment, permitting taxis to travel the full length of Tottenham Court Road during the restricted hours would unacceptably compromise the achievement of the scheme's aims.

6. **COVID-19:** One factor that has had a dramatic impact on traffic within the area in the short-term is the emergency of the COVID-19 pandemic that began to cause significant impacts on the transport network from March 2020 which show no signs of abating in the short term. Below are some ramifications that should be considered. Capacity and usage of public transport is currently constrained due to social distancing. A reasonable working assumption is that, when Covid restrictions are lifted, absent traffic measures, road usage will return to pre-Covid levels and patterns, although there is some uncertainty about this.
- 6.1. As pressure on the road network intensifies, LB Camden's policies – in Our Camden Plan, Camden 2025, the Camden Transport Strategy (CTS), the Clean Air Action Plan, draft Climate Action Plan, etc – all point to designing our streets safely for people, rather than motor vehicles. Walking and cycling are the top of the 'road user hierarchy' as set out in the CTS and are prioritised accordingly in our policies and actions. However, it seems likely that, at least in the short-term, those who do own a car (both within and outside the Borough) will make greater numbers of trips by car, thereby increasing the risk of road accidents to people who walk, run or cycle for health, exercise and utility purposes whilst maintaining social distancing.
- 6.2. There has also been evidence (for example, increased bike sales) of increases in walking and cycling, including from those who (for example) have not taken up cycling previously, as people take advantage of quieter streets and as alternatives to public transport, and leading to more pedestrians and cycling on the roads trying to meet social distancing criteria. This is something that LB Camden seeks to encourage.
- 6.3. Almost 50% of existing journeys by Camden residents are made on foot, or by bike. In normal circumstances, those journeys by 'active travel' modes are supplemented by substantial numbers of people walking and cycling to, or through, the Borough – given its inner/central London location. These walking and cycling trips, which are far more efficient uses of limited space than (private) motor vehicle journeys, are likely to increase (in the short term, at least) as public transport capacity is constrained. Only a third of Camden households own motor vehicles, and ownership is lowest in our most deprived areas.
- 6.4. The CTS contains a road user hierarchy which has pedestrians and cyclists at the top, recognising their vital role in a safer, cleaner, healthier Camden. It is imperative that the streets are made as safe as possible for these vulnerable road users, both (i) currently during times of increased motor vehicle speeding, and (ii) thereafter once road traffic begins to rise.
- 6.5. With reference to the West End Project, these objectives tie in well with the improvements the scheme will seek to deliver. Widened footways have already been delivered across the key streets of Tottenham Court Road and Gower and Bloomsbury Streets, which will help support the aims of safer travel in the pandemic situation. Additionally, the proposed traffic restrictions on Tottenham Court Road would help to deliver improved bus journey times and a safer cycling and walking environment that supports the policy commitments set out in the CTS.