

Unite London & Eastern Cab Section

Statement of Case

Camden TRO Torrington Place to Tavistock Place Public Inquiry

Introduction Unite Cab Section

Unite is one of the most influential trade unions in the country, and the Cab Section, which was formed in 1874, has a long history of leading actions to defend and improve the conditions of cab drivers. Unite has:

- led effective boycotts of railway stations to open them to taxi drivers
- helped devise the London and other cost indexes
- marched to control the number of taxi drivers on our roads
- negotiated to allow taxis to use bus lanes

Bus Lanes

From Unite submission to Labour's Manifesto for London consultation: Transport And Infrastructure.

5l. Bus lanes are a vital part of public transport in London. They allow for the travelling public to choose a speedy and reliable form of surface transport that helps the environment supports business & encourages tourists in London to use a convenient & popular alternative to the private car. Without bus lanes congestion & pollution would increase. Access to bus lanes should for bus, taxi and coaches. TfL & local councils should continue to expand bus lane availability, where appropriate between 7am to 7pm. **Access should be available to buses, taxis & coaches on all existing and new bus lanes. New road schemes should allow for access for all three transport modes mentioned above. The Mayor will oppose any attempts to reduce bus lane coverage or exclude any of the three modes mentioned above.**

Congestion

From Unite the Union Cab Section's submission to the London Assembly Investigation into Traffic Congestion in London — 31st August 2016

2. What are the key causes of these changes in congestion?

There is far more traffic using the roads which we believe is primarily caused by the erosion of the effectiveness of the Congestion Charge and the massive increase in private hire numbers that all converged into the centre of London.

There is no planning of road works and schemes and often these have a cumulative effect on traffic causing even further traffic congestion. Traffic schemes, such as the Cycle Superhighway, **Tavistock Place** and Centre Point are put in place with no thought about the consequences or plans to relieve the resultant congestion. Badly placed traffic lights and longer red light phasing add to the congestion.

There appears to be no overriding joined-up thinking to tackle traffic congestion within City Hall,

the London Boroughs and The City of London. There needs to be more liaison to ensure that one traffic scheme does not conflict with another and the effects of any schemes are fully understood across all of the affected areas. An example of this is the proposed Tottenham Court Road scheme where Camden Council's decisions will have a direct impact on Westminster Council's traffic planning.



A Now Congested Bedford Way Northbound (Left) and Euston Road Westbound

Tottenham Court Road Scheme

From Unite's point of view representing taxi drivers, it is imperative that taxis continue to have a key, strategic role in any solution. Taxi passengers are picked up, set down, or carried along Tottenham Court Road every day. Taxis provide a vital link between the passengers and the business of Tottenham Court Road and the surrounding areas.

There needs to be a holistic approach that looks at the whole West End area to identify how traffic can be moved efficiently, but the main focus must be on public transport, buses and taxis, along with cyclists and pedestrians. There must be priority for these users over all other forms of surface transport. Car use must have the lowest priority and efficient access and egress must be such that there is an improvement over the current situation. Only in this event should the scheme be considered.

Taxi use could be improved. More use could be made of taxi ranks in and around Tottenham Court Road, particularly in side streets leading to and from Tottenham Court Road and in particular the new Tottenham

Court Road Station. Having taxis waiting at ranks rather than driving empty along Tottenham Court Road would be welcome by all. Clear signage on where to get taxis would direct people to taxi ranks. A more efficient use of taxis now would be an immediate benefit.

In the longer term Unite Cab Section is keen to be involved in all discussions around the Tottenham Court Road scheme and use our knowledge to help come up with solutions that work for everyone.

West End Project

From Camden's website...

Project Overview

The ambitious project will transform the Tottenham Court Road area, making it safer and more attractive for residents, boosting business and creating new public spaces for the community and visitors to enjoy.

The one-way system operating on Tottenham Court Road, Gower Street, Bloomsbury Street and Charing Cross Road will be removed and replaced with two-way streets and some protected cycle lanes. The scheme will reduce pollution, widen pavements and make journeys quicker.

There will be a big increase in people coming to the area with the opening of the Tottenham Court Road Crossrail station in December 2018 and we need to make sure the area is safe and welcoming.

Who was consulted?

In order to develop the West End Project proposals for consultation, officers worked with local residents' groups and businesses, Transport for London, Crossrail, Camden Cycling Campaign, Inmidtown and the Fitzrovia Partnership Business Improvement Districts, London First and the City of Westminster.

Pre-consultation engagement was held with local groups and businesses and at the Bloomsbury Area Action Group during March 2014 to give people the opportunity to comment on draft proposals for consultation. The formal public consultation was held between 9 June and 1 August 2014. To read all the comments received as part of the public consultation, please see Appendix A of the decision report:

Cabinet approval

Cabinet approved the West End Project on 21 January 2015 with some amendments:

- Stepped cycle lanes on Gower Street/Bloomsbury Street, widened to 1.75m or 2m
- Adding new cycle link and crossing between Coptic St and Grape St
- Working with local businesses, residents and TfL on a trial re-timing delivery and servicing on Tottenham Court Road, Gower Street/Bloomsbury Street and New Oxford Street

The transport and public realm proposals are:

- Making Tottenham Court Road two-way for buses and cycles between 8am and 7pm from Monday to Saturday
- Between 7pm and 8am from Monday to Saturday and on Sundays all vehicles, including taxis, will have access to the whole length of Tottenham Court Road
- Making Gower Street two-way for all traffic, with stepped cycle lanes
- Six new or improved open spaces.

We will continuously keep residents, businesses and other organisations updated with any disruptions anticipated during the transformation.

Appendix H: Proposed Torrington Place trial

Sourced from the Camden Council website...

Detailed traffic modelling using an approved Transport for London traffic model (called the 'ONE' model) has been undertaken to assess the traffic impacts of the West End Project. The impacts on streets within and outside the project area were highlighted in the public consultation. (Website link no longer working).

During the public consultation, comments were received from local groups, residents and organisations that set out concerns about increased traffic for a number of streets. The key streets where the traffic impacts were highlighted are: Torrington Place, Gordon Street, Huntley Street *Ridgmount Gardens *Whitfield Street *Charlotte Street. The traffic modelling data for these streets is set out below.

Street	traffic increase / hr	% change
Torrington Place	209	102%
Grafton Way (east of TCR)	113	38%
Charlotte Street (south of Goodge Street)	38	42%
Gordon Street	134	43%

It is important when determining if traffic changes are significant or not to examine the change in traffic not just as a percentage but also in absolute terms. This highlights that the potential impact on Torrington Place would be the most severe. Whilst increases in traffic on other streets remain a concern for residents, these are considered less significant.

However, if the project were approved the traffic levels on key streets would be monitored before and after implementation and adverse impacts identified would be mitigated, where possible and appropriate. As a result of comments received in the public consultation combined with the predicted impacts from the traffic modelling, it is recommended that mitigation be considered for Torrington Place. The West End Project included proposals for Torrington Place between Tottenham Court Road and Gower Street and these are recommended for approval as set out in

Appendix D.

These changes are:

- Introduce 2m wide protected cycle lanes on the north side of the street
- Introduce 2m wide protected cycle lanes on the south side of the street.
- Widen pavements on south side of street
- Maintain one traffic lane in a westbound direction. Introduce loading area on south side of street

Appendix H: Proposed Torrington Place trial. An assessment of potential mitigation for Torrington Place has been considered and has highlighted that traffic levels on Torrington Place between Gower Street and TCR (where there is a concentration of residents) could be significantly reduced by making traffic changes to Torrington Place and Tavistock Place (east of Gower Street). Any changes to the street would also need to minimise adverse impacts on adjacent streets and take account of the importance of the street as a busy walking and cycling corridor and other requirements, e.g. local access and servicing.

To address concerns raised in the public consultation, it is recommended that a temporary trial of traffic changes to Torrington Place and Tavistock Place (east of Gower Street) of between six and twelve months is progressed to the public engagement stage. The trial would be subject to further design and Transport for London approval and include the following proposals:

- Convert the existing two-way segregated cycle track to operate as a one-way eastbound cycle lane
- Maintain one eastbound traffic lane
- Convert existing westbound traffic lane to a lane for cycling and servicing vehicles only (all other westbound traffic would not be permitted to use the street)
- Loading and access would be permitted in certain sections of the street and at specific times of the day. If the trial showed that positive impacts outweighed any adverse impacts, the changes could be made permanent. This could also allow further improvements to Torrington Place and Tavistock Place to make the street better for residents, businesses and visitors including widening pavements.

Bloomsbury Residents' Action Group (BRAG)

From BRAG's website.

Local people are angry and concerned because the consultation has been inadequate, and also because the displaced traffic from the trial has caused hugely increased congestion and pollution, and has even been holding up emergency vehicles; this in an area with three major hospitals and three major rail stations — an area of high security risk which has been the subject of previous terrorist attacks.

BRAG has produced a compromise plan which would be good for all the community, with two separate cycle lanes and two-way traffic. We know the Council papers find fault with this plan — but traffic experts say it is a viable alternative and allows for a fairer sharing of road space; this alternative plan means there would be no need for the one-way

system, and its consequential choking congestion, in surrounding communities.

If there is a public inquiry, we are asking that the merits of alternative plans, including our two-way plan and the possibility of west-bound (as opposed to east-bound) one-way traffic, be independently assessed as part of that. And, if there is a public inquiry, we are asking: why do the Cabinet papers say the Council would take steps towards making the trial permanent before a final decision is made?

Finally, the Council tells us that 79% said 'yes' to the trial. But 79% of whom? The vast majority of those who responded (86%) do not even live in the borough of Camden. It should be the local people who count. The Council could find only 564 local (WC1) residents in favour of the trial; whereas the BRAG petition found 760 against. So, of those who have expressed a view, more local people are against, than for, the trial. And those are the views that should count.

Public inquiry triggered by failure to follow key procedural steps — at cost of c.£100,000

Although BRAG supports the independent inquiry, this is not something we had asked for. It was apparently considered to be advisable by the Council, because they had failed to follow certain procedural steps which are required of Councils when making an Experimental Traffic Order (ETO). This is explained in the Council Cabinet documents:

'An ETO can be made permanent without further notice and consultation if specific procedural steps have been followed throughout, but it seems that copy documents, which were stated to be on deposit once the ETO had been made, could not be inspected by the public at the due place and time at the start of the relevant period, so the safer course is to proceed with re-advertising and making provision for objections to be made in what would be the normal way if the shortened process is not followed.' ('Torrington Place/Tavistock Place route — Trial Traffic Scheme' Paragraph 3.2)

BRAG had complained to the Council about their flawed procedures on consultation on many fronts but had not been aware of this particular oversight by the Council. The cost of the public inquiry will be in the region of £100,000. ('Torrington Place/Tavistock Place route — Trial Traffic Scheme' paragraph 10.2)

Euston Station & HS2

Euston Station is currently one of the busiest in the country, with 42,952,298 entries and exits 2014/15 (Source Evening Standard). This figure doesn't include London Underground movements.

Currently the station has too few taxi rank spaces for the amount of taxis needed at peak time. Often the station runs out of available taxis, even before Tavistock Place became one-way. To counter this shortfall Euston Station introduced a 'shared taxi scheme' to make the best use of the available taxis to help alleviate the problem.

"The London Taxi Sharing Scheme Order 2005 sets out arrangements for sharing with fixed fares between specific places and destinations. A sign will be displayed at authorised places describing the arrangement, and a taxi driver can make the taxi available for hire at an authorised place by

displaying a sign saying 'Fixed-fare shared taxi'. The maximum fare payable by each passenger is defined in the Order".

With the advent of HS2 at Euston, eleven new platforms will be built in two phases, which will nearly triple station capacity. Unite Cab Section along with the other members of the London Cab Ranks Committee is currently being consulted by HS2's developers and Transport for London, on how to manage the station's taxi requirements during and beyond construction of the new platforms.

Three new taxi ranks will need to be constructed, the first phase being in Euston Gardens. Then moving to Eversholt Street for the second, until eventually moving to a permanent location at the north of station.

Camden should reverse the Torrington to Tavistock Place Experimental Traffic Order

Unite Cab Section comments:

Unite Cab Section does not have any opposition to segregated cycle lanes or schemes to improve cyclists or pedestrian safety. Unite reiterates this in its current Transport Strategy document. Unite says that there should be more provision for cycling and walking, and that they should be part of an integrated transport strategy. However, the Torrington Place to Tavistock Place scheme in the Cab Section's view does not fall into this category of traffic management or transport infrastructure needs.

It is our view that the Torrington to Tavistock Scheme has been put into place to appease the concerns around the Tottenham Court Road proposals, which has been voiced by the residents of Torrington Place, Gordon Street, Huntley Street, Ridgmount Gardens, Whitfield Street and Charlotte Street. This is made clear in Appendix H: Proposed Torrington Place trial (as shown earlier in this document). It is interesting to note that two of the streets of concern are not even in the Borough of Camden, but are in fact in Westminster.

Oxford Street:

Taxi drivers, who ply for hire on the streets of London every day, making them one of the best placed communities to comment on how the effects of an ill thought out traffic scheme can impact traffic flows, and cause unnecessary congestion and reduced levels in air quality.

Unite Cab Section along with our London Cab Ranks Committee partners, meet regularly (once per month) with Westminster City Council to discuss the West End Project and how proposals will impact the local areas. Since the introduction of the Torrington to Tavistock Experimental order, taxi drivers are experiencing more congestion in the area of Centre Point and Oxford Street, as traffic is pushed south because the scheme

We believe the situation will be made worse if the Tottenham Court Road (TCR) proposals go-ahead. Camden Council have deemed that all traffic, including taxis that will no longer be able to use TCR and instead will be pushed into Oxford Street, at its eastern end. This will of course make Oxford Street even more congested than it is currently. To counter this increased Oxford Street traffic, the London Cab Ranks Committee has asked Westminster Council, to enforce an existing traffic management order (TMO), which would restrict traffic entering Oxford Street at its eastern end, to buses and taxis only. Westminster Council, because of their own major concerns with increased traffic flows, are currently considering this proposal.

Tavistock Place:

The Torrington to Tavistock Experimental Order has without doubt caused major congestion problems in the local area. Local residents are complaining about inadequate consultation before and since the scheme was implemented. The taxi trade has also been disappointed that unlike Westminster, Camden Council, has not consulted with it, regarding the Borough's proposals for Camden's section of the West End Project.

The result has been almost catastrophic for area. Local residents are struggling to get to and from home. Guests staying at local hotels, of which there are many, are finding the area difficult to cope with, as they try to enjoy visiting London from what should be a central and convenient base. People going to from Euston and King's Cross St Pancras Stations, are finding their journey times increased, to the point of missing trains or having to rearrange travel plans.

HS2:

Euston Station in particular, which because of morning peak demand operates a marshalled taxi sharing service. Taxi drivers who are working the station, have complained about chronic levels of traffic when trying to reach the station. Consequently, the taxi trade is struggling even more to cope with demand.

2018 will see work start on the eleven new platforms needed for HS2 at Euston Station. Because of the Melton Street closure, a new taxi rank will need to be constructed in the gardens of Euston Station. As stated earlier in this document, Euston is currently short of taxi rank spaces. With the new 'temporary' garden taxi rank, the station will actually have fewer spaces than it does now. The trade has asked for more spaces to be made available. These additional spaces can only be located 'on street', most likely in Endsleigh Gardens. Camden has turned down this request because of what it sees as an increased potential for more congestion in Endsleigh Gardens. We believe that there will be less congestion with a taxi rank, than there is now because of the current Torrington to Tavistock scheme. We believe Camden should reconsider the trade's proposals and return Tavistock Place to two-way working. Camden should also consider the needs of passengers using Euston Station, many of which do business, bring business or work in the Camden area.

Traffic modelling:

Camden has claimed that, the Torrington Place to Tavistock Place Experimental Traffic Order has been based upon 'detailed traffic modelling using an approved Transport for London traffic model (called the 'ONE' model'. Unite Cab Section disputes the validity of TfL's traffic modelling as we believe the data being used is out-of-date. The model is based upon data gathered pre Cycle Superhighway works and other major traffic schemes. To put it simply it should be scrapped. Consequently, we would like to see new data gathered London wide, and the Torrington Place to Tavistock Place Experimental Traffic Order, reversed at least until new data is processed, and after The Mayor's Ultra Low Emission zone policy has been implemented.

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