



## **London Cycling Campaign response to the consultation on Changes to the Congestion Charge.**

**September 2018**

### **About the London Cycling Campaign**

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

LCC welcomes the opportunity to comment on Changes to the Congestion Charge.

### **Summary**

LCC sees dynamic road pricing, and re-investment of the income into sustainable transport, as the only rational way of rapidly reducing congestion and overall motor vehicle volumes in London.

Changes in the congestion charging scheme to limit the exemptions to the charge can be an interim step towards this goal but, to maximise the benefits, the changes must include all private hire vehicles (PHVs) and not exclude licensed taxis which are also a significant contributor to congestion and pollution.

Wheelchair users who make use of black cabs or accessible PHVs should be entitled to reduced fares via a voucher or card scheme.

### **Meeting the Mayor's target to reduce motor traffic**

LCC strongly agrees with the Mayor that motor traffic in London has to be reduced to help make our capital safe, efficient, healthy and vibrant. Dynamic road pricing, which varies charges by where, when and how much drivers use the roads, is the fastest and most rational way to achieve this and we urge TfL to implement it urgently.

In this context, TfL's current consultation on the congestion charge proposes some necessary short-term changes but it does not go far enough. Tightening the conditions for exemptions for electric and hybrid cars is necessary, and will help encourage a move to non-polluting vehicles, but it will not eliminate enough congestion or reduce motor vehicle volumes.

With road pricing likely to become an imperative, and we note its inclusion as an option in the Mayor's Transport Strategy, removing congestion charge exemptions for private hire vehicles (PHVs) must be wide-ranging and extend to all, rather than 'most,' vehicles in this category.

TfL attributes 75% of congestion to 'excess traffic' and both black taxis and other PHVs contribute significantly to that as well as to air pollution<sup>1</sup>: in the City of London private cars, PHVs and taxis account for a third to half of peak traffic, and, within that, black cabs account for a third of the vehicles.

The consultation document states:

*"In central London it is vitally important to increase the high walking, cycling and public transport mode share by ensuring that streets are attractive to those who use these modes, and make best use of scarce and valuable road space for freight, servicing and other essential vehicular trips. London's streets are some of the most congested in the world, worsening air pollution, delaying vital bus services and freight trips, and making too many streets unpleasant places for walking and cycling. Without further action, average traffic speeds are forecast to fall across London, with central London particularly badly hit. Excess traffic is estimated to be responsible for around 75 per cent of congestion in London so managing demand for road space is crucial."*

Curtailing exemptions from congestion charging for all private motor traffic would, as the Mayor requires in his Transport Strategy, increase the use of public transport, walking and cycling with all the individual and collective health benefits that arise from that.

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<sup>1</sup> Travel in London 10 p 161

We note that passengers with wheelchairs are currently limited in the vehicles they can use for private hire. To exempt such individuals from any possible increase in hire charges, once exemptions are curtailed, a voucher or card scheme can be introduced.

In considering exemptions from congestion charging for certain categories of transport the Mayor must remain mindful of his target of increasing trips by public transport (in which he does not include PHVs or taxis)<sup>2</sup>, cycling and walking to 80% by 2041 from the current level of 62%. Allowing an exemption to congestion charging, either now or in a future dynamic road pricing scheme, for private vehicles used for hire (whether PHV or licensed taxi) risks undermining the modal shift to sustainable transport modes.

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<sup>2</sup> “Active, efficient and sustainable modes are defined in the draft MTS as walking, cycling and public transport. For this purpose, public transport does not include trips by licensed taxi and private hire.” Travel in London report 10 p 31