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Date: 23rd June 2010

Dear colleague,

Consultation – Western Extension of the Congestion Charge Zone (WEZ)

I am writing to submit my comments on the statutory consultation for the abolition of the Western Extension of the Congestion Charge Zone (WEZ). I and all other current members of the London Assembly Labour Group are opposed to the removal of the Western Extension and see this as a step in the wrong direction in terms of the environmental management of London. There will be a negative impact on the public transport system, a reduction in income for public transport investment and a predicted increase in motor traffic in the area.

Background

In May 2003 TfL were asked to explore the possibilities of extending the benefits of Congestion Charging to other areas of central London suffering from congestion. The Western Extension area was recommended on the grounds that it:

- suffered significant congestion through the day;
- was relatively well served by public transport;
- was surrounded by routes suitable for volumes of traffic wishing to avoid a charging zone.

Although locally controversial the strategic London wide agency for transport in London (TfL) went ahead with the installation of the Congestion Charge Extension for West London. The predictions for traffic reductions in the new zone were:

- Total traffic entering the zone projected to decrease by 13 to 17 percent;
- Cars entering the zone projected to decrease by 22 to 28 percent;
- Vans entering the zone projected to decrease by 6 to 12 percent;
- Lorries entering the zone projected to decrease by 0 to 3 percent;
- Taxis entering the zone projected to increase by 10 percent;
- Buses and coaches entering the zone projected to increase by 10 to 15 percent;
- Total traffic circulating within the zone projected to decrease by 10 to 14 percent.

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Impact of the Western Extension

The Western Extension immediately reduced the numbers of potentially charged vehicles within the zone by 17 percent, achieving significant reductions in congestion and encouraging people to switch to public transport, cycling and walking. The breakdown by type of vehicle for the first year was:

- Total traffic entering the zone decreased by 14 percent;
- Cars entering the zone decreased by 21 percent;
- Vans entering the zone decreased by 6 percent;
- Lorries entering the zone decreased by 0 percent;
- Taxis entering the zone increased by 0 percent;
- Buses and coaches entering the zone increased by 4 percent;
- Total traffic circulating within the zone decreased by 10 percent.

Although congestion has subsequently returned to pre-CCZ levels, in the absence of Congestion Charging conditions would by now be far worse than prior to the introduction of the scheme. There has been more public realm created and the transfer of some road capacity to pedestrian crossings

The Mayor's own formal consultation document states that:

"As expected, the scheme reduced traffic in the Western Extension area by around 30,000 vehicles each day, and initially congestion in the area was reduced. But while traffic volumes remain well below those seen before the Western Extension was introduced, other changes including significant development and road works, have meant that congestion has increased again (though it would have been worse in the absence of Congestion Charging)."

The scheme has helped to reduce emissions of climate change gases and environmental pollutants from vehicles and encouraged people travelling in the area to use public transport, or to walk or cycle. It has also raised net revenues that have been used to support the Mayor's Transport Strategy."

Effects of the Abolition of the Western Extension of the Central London Congestion Charge Zone

The primary focus of the Congestion Charging scheme has always been to tackle congestion and reduce traffic. It was always expected that related reductions in the emission of air pollutants from vehicles would occur. The effect of abolition can only be to encourage an increase of traffic and congestion resulting in dirtier air and a higher road traffic accident rate. The Mayor's actions are against the interests of the majority of Londoners. The Mayor has based his arguments in public for the removal of the WEZ on its unpopularity with some local residents and businesses. However, the centre of London is of strategic interest to London as a whole. Poor air quality arising from heavy vehicle traffic, especially those with diesel engines, in central London is of a direct health impact on a wider visiting, employed and resident population.

The likely negative effects of this abolition can be summarised as:

Traffic & Traffic Congestion

An increase in traffic and traffic congestion within and around the area of the abolished extension will occur causing journey delays with consequential economic loss to Londoners and local businesses. TfL's own analysis states that removing the Western Extension will lead to an increase in traffic and congestion in the area, when drivers deterred by the charge return to the zone.

Even the RAC, staunch defender of the rights of motorists states:

"Removal of the Western Extension of the congestion charge would seem not to conform with the Draft MTS as it would lead to an increase in congestion that it is unlikely could be sufficiently mitigated by other measures."

MTS projections already show an anticipated increase of Traffic Congestion of 14% by 2031 despite improvements such as the Crossrail project. The draft MTS argues for the

"Mitigation of increased road congestion through better management of the road network and road user charging" (p252 draft MTS October 2009).

It is hard to see therefore how the removal of the WEZ can be justified in the context of this anticipated background rise in traffic congestion.

Environmental Pollution

There will be an increase in the consumption of fossil fuels and therefore an increase in polluting emissions of all varieties (primarily greenhouse gases and particulates) within and around the area of the abolished extension. This is bad news for everyone who breathes central London's air! The draft MTS shows that there is already an anticipated 'policy gap' in CO₂ emissions by 2025 – with the Mayor failing to meet his own CO₂ emissions targets by approximately 2 millions tonnes of CO₂. The draft MTS itself concludes that "Road User charging, with low carbon vehicle incentivisation" has the greatest potential for filling the 2025 policy gap (p222 draft MTS 2009).

TfL estimate that emissions of polluting particulates (PM₁₀) from traffic in the Western Extension will increase by at least 3.5%, emissions of the various oxides of nitrogen (NOx) will increase by a minimum of 2% and CO₂ emissions will increase by at least 5%. The level of pollution in London, particularly pollution caused by particulates (of which PM₁₀ is particularly damaging) is already above EU air pollution targets.

Although the Mayor has an Air Quality Strategy and a Climate Change Mitigation and Energy Strategy, these strategies are only in their draft stages and will not come into effect until after the abolition of the Western Extension.

The Mayor seems intent on a measure that will not only keep the level of these pollutants higher than they should be in the long term, he is actually ensuring that they will increase in the short term when what we need are drastic reductions in pollutants to conform to internationally agreed standards.

Neil Churchill, chief executive of Asthma UK, called the decision "short-sighted" and said the breathing condition is made worse by traffic. "This is a disaster for the 430,000 people in London whose asthma is triggered by traffic pollution."

Additionally there will be an increase in traffic noise levels for residents within the area of the abolished extension.

The Mayor's approach to pollution in general through his negativity toward Congestion Charging and the Low Emissions Zones in London are likely to contribute to London falling foul of the European Union standards on polluting emissions leading to a fine several times that of the annual income of the Western Extension. Under such circumstances the Mayor's intent to abolish the Western Extension and refusal to take any further measures to reduce polluting emissions in London is not only reckless financially, but plays Russian Roulette with the health of Londoners.

The Mayor's own air quality strategy shows that there are 4,300 premature deaths per year in London due, at least in part, to long-term exposure to dangerous airborne particles. This level of deaths is caused by a level of vehicle emissions higher than the EU air pollution targets. Breach of EU targets is expected to result in a financial penalty of £300m imposed on the UK.

Lord Hunt Minister from DEFRA wrote to Boris Johnson in October 2008:

"The recent consultation on the Congestion Charge Western Extension is clearly important to safeguarding improvements in air quality as well as carbon reduction in London. There have been real benefits reported by TfL following the introduction of the Western Extension, including an estimated reduction in PM₁₀ emissions of 4.2 percent, in oxide of nitrogen emissions of 2.5 percent, and in CO₂ emissions of 6.5 percent. The Transport for London impact summary for the consultation on the Western Extension highlights the negative consequences for air quality arising from the removal of the Western Extension or the introduction of a charge free period. The actions to date have brought London both European and International recognition for the scale of its efforts and I would urge you to keep the air quality gain the Congestion Charge and other initiatives have delivered"

I strongly agree with these views expressed by the then Minister at DEFRA.

Environmental Infrastructure

Abolition of the Western Extension will lead to an increase in the expense of the maintenance and running costs of the road infrastructure and associated ancillary services.

Additionally environmental deterioration in and around the area of the abolished extension will also be speeded up.

Public Transport

There will be a slowing down of bus movements and consequential increase in bus journey times within and around the area of the abolished extension together with a decrease in the use of public transport within the area of the abolished extension and the

wider area in West London. Overall reductions in motor traffic have been associated with a reduction in bus journey times and an increase in cycling and other forms of sustainable transport within the zone. Since 2000 the mode share of private motorised transport in London has fallen by around 6%, levels of cycling have almost doubled and public transport use has risen dramatically. There is no doubt that the creation of the Congestion Charge Zone and its extension has been a key driver in encouraging and facilitating this shift from private cars to more socially and environmentally responsible forms of transport.

It is expected that by 2031 there will be around 1.3 Million more people and over 750,000 new jobs in the capital (MTS draft 2009) every day there will be another 3 million more journeys than there are today. It is vital that the Mayor's strategies for dealing with this growth prioritises sustainable forms of transport. If this growth is predicated on vehicle traffic growth then London will simply become choked by traffic.

Public Finances

Abolition of the Western Extension will most obviously lead to a decrease in the revenue raised by Congestion Charging in London. According to the Mayor's own literature, the removal of the Western Extension will result in a reduction of £55m to £70m per year in net revenue for TfL. When the Congestion Charge is increased to £10 as is planned this figure would also have been increased proportionately. £70 M in just one year, would be enough to pay for a new interchange station at Brixton on the East London Line extension to Clapham Junction, estimated at £40m and fund the shortfall in the budget needed to pay for the establishment of the planned East London Line Surrey Canal Road station, or establish and fund for one year four or five medium-sized bus routes. In just three years it would raise more than enough to go ahead with installation of the abandoned Crystal Palace extension of the Croydon Tramlink scheme.

Reinvestment of this sort has always been at the heart of the social benefits made possible by adopting Congestion Charging in London, and it is the dismantling of such sources of funds by this Mayor that will have such a deleterious effect on London Transport infrastructure.

The RAC states that "now that the initial investment costs are sunk, the loss of income would be particularly unfortunate in view of TfL's funding challenges."

Retaining the Western Extension in a modified Form

The Mayor's belief that the Western Extension is "delivering huge numbers of cars into the central zone" points to a probable fundamental problem with the Congestion Charging Zone as currently structured. The Western Extension was created literally as an extension to the pre-existing Central London Congestion Charging Zone rather than as a separate adjacent zone, and this meant that it was not designed to fit with the life and work styles found in the largely residential West Central London area. Restructuring the existing extended zone into two separate zones with their own rules of use might well alleviate much of the criticism with the Western Extension, reduce congestion and pollution even further and allow the continued collection of funds for re-investment in London's transport infrastructure.

Conclusion

The Mayor will surely understand that his abolition of the Western Extension of the London Congestion Charge Zone will have a huge social cost both to the area of the abolished zone and indeed the whole of London. The uncontroversial and incontestable result of this abolition will be that within and around the area of the abolished extension there will be:

an increase in:

- traffic and traffic congestion;
- consumption of fossil fuels;
- poorer air quality – with more ill health and deaths from respiratory illnesses;
- the expense of the maintenance and running costs of the road infrastructure;
- environmental deterioration;
- noise levels for residents;
- the hazard to cyclists and pedestrians;
- bus journey times;

a decrease in:

- the use of public transport within the wider area of West London;
- the revenue raised by Congestion Charging in London;
- the quality of life of all Londoners.

At a time when this Assembly is encouraging Londoners to adopt greener approaches to their lifestyles the Mayor's abolition of the Western Extension sends entirely the wrong message to Londoners. And at a time when the UK's financial resources are stretched the Mayor's abolition of the Western Extension squanders public resources intended for reinvestment in London's public transport infrastructure.

This Assembly is united in encouraging Londoners and its visitors to use public transport, but yet again, the Mayor's abolition of the Western Extension will only encourage the use of private motorised transport.

We believe that the Mayor may well understand that the abolition of the Western Extension is against the public interest and that this abolition is only proceeding because he made it an election pledge during his 2008 campaign. We now call on the Mayor to prove his statesmanship by reversing his decision on this ill-conceived abolition, in the interests of the majority of Londoners.

The GLA Act provides that the Western Extension of the central London congestion charging zone may only be revoked if it appears desirable or expedient for the purpose of directly, or indirectly facilitating the achievement of any policy or proposals set out in the Mayor's Transport Strategy. In my view it is NOT possible to justify the removal of the WEZ as currently proposed with reference to any of the Mayor's Transport strategy objectives. In fact the opposite is true. The main objectives of the MTS will be undermined by the removal of the WEZ.

I urge the Mayor as Chair of Transport for London to retain the Western Extension of the Congestion Charge Zone and to seek instead to improve its current functioning.

Yours sincerely

Valerie Shawcross AM CBE
Labour Assembly Member for Lambeth & Southwark