



STATEMENT OF CASE

NATIONAL UNION OF RAIL, MARITIME & TRANSPORT WORKERS TAXI BRANCH (RMT)

SUMMARY

RMT Statement of Case outlines the main objections to the experimental traffic order (ETO) in place across the Tavistock Place corridor.

LIST OF ANNEXES TO RMT's STATEMENT OF CASE 03/09/2017

1. Traffic increases
2. Air pollution
3. Accidents
4. Cycle speeds / cycle tracks
5. HS2
6. Pedestrians
7. Consultation

TRAFFIC INCREASE

- 1.1 Traffic increases on surrounding roads as a result of the Tavistock experimental traffic scheme are causing increased difficulty for our members and the wider public. RMT will point to evidence within Camden's consultation document 'Proposed improvements for walking and cycling' and Camden's statement of case.
- 1.2 The scheme as it currently stands has had a negative impact on journey times to and from University College Hospital (UCH). This is being witnessed by Taxi drivers who are part of a scheme called 10HS. UCH is the first hospital in London where a Taxi discount scheme for staff, patients and visitors is offered on journeys to and from the hospital. Detail will be provided with reference from @10HSTAXI on twitter.
- 1.3 We will refer to the Traffic Management Act 2004 (TMA) to show how we consider Camden to be failing in their network management duty. The main sections referenced to this will be the summary and sections 16 & 17. RMT does however take into account Camden's obligations, policies and objectives.
- 1.4 RMT have grave concerns over the traffic monitoring data provided within the consultation document 'Proposed improvements for walking and cycling'. We will bring into evidence an e-mail from Louise McBride, Camden's Acting Assistant Director for Environment and Transport on 11/02/16. The email states that extensive monitoring of traffic was taking place and being compared to the 'before data'. The data provided by Camden within the consultation documents cannot be considered as extensive monitoring of traffic.

AIR POLLUTION

- 2.1 RMT will refer to the complete lack of air pollution monitors in roads where Camden predicted traffic displacement. Displaced traffic will be referenced from Camden's alternative route plan. The RMT welcomes pollution reduction through the Tavistock corridor. However we are deeply

concerned that pollution levels on alternate routes have not been monitored sufficiently. We will also refer to photos of existing monitors.

2.2 We will refer to a WSPPB air quality document which describes best practise when using air pollution monitors. Recommendations within this document would have aided Camden to achieve an accurate assessment of air pollution on the surrounding roads.

ACCIDENTS

3.1 RMT are of the consideration that there were alternative options to reduce accidents rather than the experimental traffic scheme in place. We will reference evidence from TFL's collision map and crashmap.co.uk. We will also refer to Camden's Statement of Case and consultation document 'proposed improvements' and the London Cycling Design Standards (LCDS) provided by TFL.

3.2 We will bring into question whether the scheme has delivered the accident reduction so desired considering the negative impact on roads in and around the scheme. In times of budgetary constraint such a scheme seems disproportionate in order to achieve little or negligible effect on cyclist collision statistics.

CYCLE SPEEDS / CYCLE TRACKS

4.1 RMT hold serious concerns over cycling speeds through the corridor and on the surrounding roads. We will refer to evidence from the STRAVA cycling app where cyclists can race against their personal best times on selected routes. STRAVA also gives cyclists opportunities to race against the best times set on leader boards. Many of these

selected routes are in and around the traffic scheme. We will also refer to Camden's statement of case.

4.2 RMT consider that there were alternative cycle track options that could have been implemented to reduce the increasing problem of cycling speeds other than the cycle tracks chosen for the scheme. We will also look at whether an alternative Cycle Level of Service (LCOS) could have been applied to make the scheme more inclusive of all road users whilst providing adequate capacity for cyclists. These alternative options including LCOS will be referenced from the LCDS documentation.

HS2

5.1 RMT consider that HS2 was not seriously taken into consideration when this scheme was in its planning stage. Whilst a consultation had taken place in 2015 for Euston Station which showed some road closures, the full nature of the construction works were not known. This should have been a contributory factor when planning this scheme. We feel there were much less complicated measures that could have been implemented to keep cyclists safe on this corridor whilst the full extent of HS2 works was known. Evidence will be provided in the form of an email from Louise McBride as stated in 1.4.

5.2 There are now reports available outlining the impact HS2 will have on the areas in and around Euston Station. These documents show that this scheme should not have been considered until after the HS2 works had been completed. Reference will be taken from Camden Documents 'Impact of HS2'

PEDESTRIANS

6.1 RMT believe alternative options within the scheme could have been introduced to achieve good Pedestrian Comfort Levels (PCL). RMT recognise high levels of pedestrians within the area due to students at the University of London, but believe that there are more effective solutions that could have been introduced. We will also address accident statistics and pedestrian numbers. RMT will point towards

information contained within the Camden's Statement of Case, Pedestrian Comfort Guidance for London (TFL) and consultation document 'Proposed Improvements'

CONSULTATION

7.1 RMT will question whether more information could have been provided within the consultation documents. Whilst we understand there are certain limitations to the amount of information that can be published, we believe that additional data could have been provided along with a more balanced approach. We will point towards information contained within the Consultation document 'Proposed Improvements' & Camden's statement of case.

STATEMENT OF CASE DOCUMENTS

https://www.camden.gov.uk/ccm/cms-service/stream/asset/?asset_id=3365683&

https://consultations.wearecamden.org/corporate-services/torrington-place-tavistock-place-route-proposed-im/supporting_documents/Detailed%20information.pdf

<https://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/torrington-place-to-tavistock-place-public-inquiry/>

<https://tfl.gov.uk/corporate/safety-and-security/road-safety/london-collision>

<http://www.crashmap.co.uk/>

<http://www.legislation.gov.uk/ukpga/2004/18/contents>

<http://www.wsp-pb.com/Global/UK/Policies/WSPPB%20City%20Air%20Quality%20at%20Height.pdf>

<https://tfl.gov.uk/corporate/publications-and-reports/streets-toolkit>

e-mail from Louise McBride received 11/02/16

Photos of air pollution monitors.

Twitter feed @10HSTAXI