



14TH Jan 2020

CPT RESPONSE TO PROPOSALS FOR HORSEFERRY RD PARKING

The Confederation of Passenger Transport UK is the trade association of the bus and coach industry, representing over 1000 operators including large bus and coach companies and numerous small and medium enterprise (SME) companies.

Introduction

As an industry, we welcome any balanced proposals which will improve travel in the Capital, enhance the environment, making it more attractive and appealing to Londoners and visitors alike.

It is without question that there are issues in Westminster which need to be addressed and which in doing so can benefit both residents and visitors. CPT fully supports these broader aims and has always been available and willing to work with stakeholders in achieving these aims.

General

The coach industry is an integral part of London's transport infrastructure, providing travel links, particularly for groups and those with impaired or restricted mobility and those who have particular needs requiring special attention, children or those for whom English isn't their first language for instance, all of which supports the City's tourism and commerce.

CPT broadly supports any measures which will reduce congestion, allow traffic to flow freely, improve air-quality and increase the efficiency of transport in the capital by focussing the limited road space on those modes which can make the greatest contribution to these aims.

The Proposals

With regard to the proposals, CPT would wish to raise the following general points:

- CPT applauds all efforts to improve the transport infrastructure in London and is has contributed to efforts towards this. It is our very firm belief that changes should strike a balance and that any changes proposed should not disadvantage any particular group in a disproportionate manner.



- CPT would condemn any incidences of anti-social behaviour; this would include vehicles left idling whilst stationary and have actively worked towards discouraging such activity both within the body of our membership and within the remit which we as a member organisation have.
- It should be noted that EuroVI coaches, which following the introduction of ULEZ will make up a substantial proportion of those active in Westminster, have emissions which are broadly equivalent to most Euro6 cars, so one coach contributes the same as most of the diesel cars registered in the past three years. Given that coaches carry an average of 44 passengers and cars have an average occupancy of 1.58, coaches are more than 25 times more efficient in terms of emissions than an average diesel car when measured against the distance travelled per passenger.
- In considering the role coaches play in servicing the needs of the theatres, cultural centres and leisure facilities of National significance in London, CPT would wish to highlight the part that coaches play in providing environmentally friendly, practical and affordable transport to visitors from across the globe. Providing a secure and easily controlled travelling environment for potentially vulnerable customers such as children, those for whom English is not their first language and high profile groups, has made coaches their travel mode of choice. Other factors such as accessibility, security and ease of baggage handling are also critically important, making ease of access to facilities crucial.
- Taking these points, we are compelled to question the merits of a proposal which removes essential facilities required by a mode of transport which makes such a positive contribution and replace them with facilities supporting other modes which encourage congestion, could easily result in an increase in overall emissions and are therefore likely to have a negative impact on air-quality?



The proposal

Dealing with the proposals themselves, we would wish to comment on the following aspects specifically:

Coach Parking in Horseferry Rd

The Horseferry Rd coach bays are clearly well used which suggests that they are an essential part of the transport infrastructure. Replacing these bays with resident parking is encouraging the use of private cars, clearly if there was no need of these in the past, only an increase in car usage can have created a demand for them now. This can only have a negative impact on congestion and total emissions, particularly those of the critical elements which reduce air-quality.

In doing so, these proposals have a detrimental effect on the environment by increasing the number of private cars in the vicinity. This is contrary to Westminster City Council (WCC) policy we believe.

Reduction in coach parking capacity

The reductions in coach parking capacity have challenged the coach industry in recent years, CPT fully accepts the demands on kerbside space and have long advocated an approach favouring those modes which contribute most, whilst having the least environmental impact. Further reducing the capacity will inevitably lead to two resultant outcomes.

- a) The visitors don't come - A potential reduction in the number of coaches entering the area with those visitors choosing not to come to London, the result of which removes the income from 200+ visitors daily to the Capital's economy. Over the course of the year, this could be significant.

And/ or

- b) The visitors continue to come – Either they use less environmentally friendly modes of travel, or the coaches are forced to seek accommodation elsewhere, which can result in substantial additional mileage finding a suitable parking space together with resultant emissions, congestion and noise.

In reality, there is a likelihood of the result falling somewhere between the two which results in very little that could be regarded as a positive outcome for anyone.



Incidence of engine idling

As mentioned above, CPT is open to dialogue and collaborative working in order to eliminate incidences of engine idling, CPT have seen a reduction in the volume of incidences of this brought to our attention by WCC over the past couple of years. Whilst we don't record these specifically, we believe we've only been contacted regarding two incidents concerning anti-social behaviour by coaches during 2019 (January and October), neither of which concerned Horseferry Rd.

Whilst CPT has no powers it can invoke in order to penalise coach drivers or operators, beyond making an approach to them, we are always willing to engage if we can make a positive contribution. Clearly this is easier with our member operators and in most cases where it has been possible, the outcome has been positive.

Enforcement

CPT advocates enforcement which is fair but unequivocally firm to deal with any matter which is causing concern and engine idling is a prime example of this. Having had such little contact in the recent past regarding any particular incidents in Horseferry Rd, we were somewhat alarmed to learn that the matter was considered to be justification for removal of the bays, and conscious that enforcement has to be the tool of first choice to eliminate such issues, we requested details of the extent of the issue as demonstrated by the enforcement action taken.

The data suggests an average of 143 visits conducted each month during 2019. The rate of engagement for code 63 violations (witness vehicle engine idling whilst parked/ standing) was just 1 in each month, meaning that intervention was required on less than 1% of visits. It should be noted that in every case, the matter was dealt with a "soft action" approach, something to be commended on the part of the enforcement officers and clearly they have had to do little to rectify the situation.

Whilst CPT is totally committed to eliminating engine idling, we don't believe that this level of enforcement action in Horseferry Rd suggests that there is a sufficient body of evidence to justify it as a cause for removal of these bays.



Buckingham Gate/ Victoria St Rd Route Proposals

There is undoubtedly a need to action which will address the issues on Buckingham gate and CPT is supportive of this need. The Changing of the Guard is an integral part of the London tourist itinerary, particularly for overseas groups, so they will still come and implementing Red-Route restrictions without providing alternative and sufficient capacity for them will not eradicate the problem, the issues will either continue or move elsewhere.

With this in mind, it seems perverse that removing one of the two parking areas which are the only available alternatives, and which have been mentioned as such, is being considered at this stage of the proposals for Buckingham Gate.

Alternatives

Within the resources and powers available to us, CPT are keen to work with WCC on resolving any matters of common interest and would be keen to discuss this particular issue further. If alternatives can be found, either retaining these bays or re-locating them, the outcome will achieve the desire of WCC's tourist businesses to retain customers and WCC's desire to satisfy the needs of its residents. We would welcome the opportunity to do this before action which fails to address the issue, and conceivably could make it significantly worse, are imposed.

We would certainly be open to discussion on potentially relocating these bays and would encourage dialogue on longer term issues of mutual interest such as allocation of space and charging facilities for the new generation of electric coaches now entering service. These bays would be an ideal location to both trial technology allowing more flexible use of the space and to provide charging for electric coaches which will become more common in the years ahead. These vehicles can make a massive contribution to air-quality but the uptake of them is dependent on suitable infrastructure to support them being available.

We have advocated encouraging efficient usage of space and exploring the use of technology to allow more flexible options for kerbside space, maximising efficiency of the available space. This could open up other areas and allow coach parking to be located in what might be deemed to more acceptable locations.

Summary

CPT is clearly concerned that this project will further reduce the already challenged supply of coach parking in the Capital and in consequence have a negative impact on air-quality, congestion and the economy of the tourism and leisure sectors.

That the justification for its implementation is based on such a weak body of evidence is something we find particularly disturbing. The enforcement data is the only evidence presented and we are forced to suggest that this proposal lacks sufficient factual justification for such drastic action and which is likely to have such a negative impact.

CPT is of course willing and available to discuss any aspect of the proposals or alternatives and we would urge a wider discussion which takes all current matters into consideration, including the future for Buckingham Gate.

We look forward to hearing more on this in the near future.

Kind regards

A handwritten signature in black ink, appearing to read 'AW' followed by a flourish and a period.

Andy Warrender
Coaching Manager
Confederation of Passenger Transport