



Federation of Small Businesses
The UK's Leading Business Organisation

2 Catherine Place
Westminster
London
SW1E 6HF

29th January 2015

Dear Transport for London Board Members

The Federation of Small Businesses (FSB) welcomes the intention to improve road safety in London and the work being done to reduce, as much as possible, the risk of death and serious injury for cyclists.

However, we are concerned about the speed with which the proposals for Cycle Superhighways are intended to be implemented, should approval be given at your Board meeting on 4th February 2015.

Whilst we are pleased to see that there have been some modifications to the original proposals for the Cycle Superhighways, we are disappointed that the plans are being pushed through so quickly, allowing very little time for firms to make adjustments to their business operations.

Assuming approval is given on the 4th February, we note that work will begin as early as next month and be in full swing by April on the four proposed routes, giving businesses less than three months to make alternative arrangements to mitigate the impact of the development work on their business.

It is also disappointing that the environmental impact assessment was only released at the same time as the findings were announced and the journey time modelling outlining the impact on businesses entering and operating across London, is still not available.

Our members report considerable congestion on strategic routes – most recently around Moorgate with the Crossrail work - making it particularly difficult to travel through. We do not feel that the collective impact on commercial road-users and businesses, of imminent and expected planned roadworks, such as Tottenham Court Road or the 'Super Sewers', has been fully understood.

Therefore we urge members to move for the timetable for the planned Cycle Superhighways to be reconsidered to allow a more strategic implementation plan to be devised that allows businesses to be more fully engaged and informed.

Yours sincerely



Sue Terpilowski OBE - Chair, FSB Greater London Policy Forum

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From: Leon Mannings [mailto: [REDACTED]]
Sent: 30 January 2015 12:22
To: Carter Howard; Gourley Jennifer
Cc: John MITchell; Selina Lavender - East Anglia Region / Director;
Simon.Wickenden@[REDACTED]; Tim.Madgwick@[REDACTED]
Subject: SCHs: Key Points for all TfL Board members to consider

[REDACTED]

[REDACTED]

Dear TfL Board Member,

I write to you primarily as a member of the Mayor's Roads Task Force whose Doctoral thesis generated new knowledge about the realities of policy development processes from which proposals like the East-West CSH emerge in practice – and as distinct from reassuring theories and assumptions. I also work closely with senior officers in TfL, the City of London and the City of Westminster, as a representative of one third of London's Vulnerable Road Users who ride Cycles with motors, namely Powered Two Wheelers (PTWs).

My purpose is to highlight two critical aspects of the proposals for you and the millions of people who need to use London's roads as they have been underplayed or dismissed by advocates and proponents of the scheme. I also pose questions that you may well be asked if the proposals go-ahead – and the happy days thereafter that are promised, do not come as far as the majority of people and businesses in London are concerned.

Question: How can proposals of this unprecedented magnitude be approved, before stakeholders and the public have seen a comprehensive Environmental Impact assessment or a clear and plausible comparison between the full costs and hoped for benefits – which has not happened to date?

Now I would like to clarify aspects of the context and perspectives in which those answers will be placed for all who will be affected – and irrespective of the extent to which those boundaries are recognised as such.

Significance: In essence this scheme will introduce a London-wide swathe of policy measures that will amount to the greatest level of new constraints on vehicular road use ever to be imposed anywhere in the UK. And, despite the ceaseless flow of well polished figures about rises in walking, cycling and public transport, the harsh reality is that most movements of people and goods in London are facilitated by private motorised vehicles. Moreover, that will continue to be the case for the foreseeable future because the alternatives are not economically sustainable for the majority of journeys.

To be clear, the introduction of these measures will slow traffic flow and increase congestion throughout Central and Greater London. In turn that will make road use significantly more costly in terms of time, money and air quality for the vast majority of road users. And, on human level that is rarely considered by most key policy shapers these days, it will add millions more hours per year of frustration and misery for the majority of people for whom London is a place to live and/or work, or visit.

Hopes: On a brighter note, all Cycling Superhighways and especially the East-West scheme are presented as positive developments. The laudable objectives are to improve safety for riders of a mode that currently facilitates around 3% of transport by road in London – and to deliver a dramatic rise in the number of cyclists in the centre of the Capital.

Concerns: However, and regardless of the extent to which reallocating road space for exclusive use by cyclists will achieve those laudable objectives in practice, the extent of negative impacts on the other 90+% of road users will be greater than any proposal in the history of UK transport policy development.

Moreover, there are two critical categories of adverse impacts. The first results from measures that will increase congestion – and the environmental and economic problems it creates. The second is to significantly increase risks of injury for PTW riders – and reduce the efficiency of a mode that the Emergency Services are increasingly reliant on to meet demand for their vital work.

And, as no business case or Environmental Impact Assessment has been published, it is impossible for you or anyone to know how much damage the London-wide increase in journey times will do to air quality, or the economy at macro and micro level.

What we do know is that holding up millions of drivers for longer than needed for safety reasons at 'gating points' will increase pollution and journey times. It will also have adverse impacts on the profitability of every business that relies on motorised vehicles to move people and goods – and on costs for consumers.

Key Fact 1. In order to try to limit the prospects of gridlock in Central London, the East-West scheme will require the introduction of an unprecedented level of new constraints on vehicle use throughout the whole of London. And, at the launch of the current proposal, TfL's manager of those measures confirmed that the adverse impacts of those constraints will extend out to the M25.

As you will see in the pictures attached of the Embankment, there is a stark difference between a photograph of the real situation and an 'artists impression' of what the roads will look like if the CSH is built.

Closer examination of the photo also reveals that the lane widths allocated for traffic are so narrow that although they meet what some regard as an acceptable minimum of 3 metres, there is insufficient space for an emergency services officer to get through.

Key Fact 2. The current plan for the E-W CSH is to take out three lanes of one-way road space for Westbound traffic, and to convert the one-way Eastbound carriageway into a two-way road with no physical division between traffic running in opposite directions. This halves capacity for all road users apart from cyclists, and halves the

space for PTW riders to manoeuvre in. Nevertheless, you may have been persuaded that any problems this would cause are outweighed by the benefits to cyclists.

here are however two disbenefits that have not been mentioned in any of the literature that has been published in support of the scheme – so you may not have given them due consideration until now.

First, the introduction of unsegregated two-way running creates a new hazard for PTW riders in the form of brand new risks of head-on collisions. Secondly, it will effectively prevent any filtering by emergency service PTWs because the current plan proposes to keep traffic lane width to 3 metres, and that includes hard engineered single lanes at various points on the route.

In essence, this scheme as currently proposed will increase the risk of injury or death for PTW riders – and significantly reduce the advantages that PTWs offer for essential journeys. And bearing in mind that within the next ten to twenty years, most PTWs will have zero or negligible emissions, approving a plan to reduce the positive contributions these machines offer as a congestion busting mode – in the many situation when walking, cycling or public transport can't meet needs for essential movement – will look like a questionable decision to say the least.

Summary of problems:

In summary, the current proposals and especially the East West CSH, will deliver far more disbenefits than benefits to transport by road in London. The overwhelming majority of road users, including bus passengers – and PTW riders in particular will be significantly worse off.

I am sufficiently in touch with the realities of this situation to have no expectation that any alternatives to steamrolling the current plan through will gain sufficient traction to make any difference – but I feel duty and honour bound to make them anyway.

Solutions:

A. Pose the questions I have raised to TfL, and suggest that implementation should be postponed until answers are given that you can be sure are comprehensive and plausible enough to convince the real majority of people in London that the expenditure of over 100 million of their pounds is justified.

B. Suggest that TfL refines the proposals further to reduce the adverse impacts. By way of example, the adverse impacts on the safety and efficiency of PTW use could be significantly reduced by changing the proposed traffic lane widths from 3 to 3.7 metres – and having discussed this with my MET Police colleague on the CSH Design Review Group (DRG) and APCO's lead officer for motorcycling, they both agree that this would be a good and sensible step forward.

Common Sense?

Lastly for now, I suggest that as far as the public who will pay for these radical changes to London's overburdened road network are concerned, there is a disturbingly large gap between the current plan and common sense.

And, in case you have been reassured by claims that the proposals are supported by 80% of consultation respondents please remember two things: 20,000 responses is a lot, but there are over 8,000,000 people in London and the RTF was assured that it will be 10,000,000 in the foreseeable future. And, like many respondents, I broadly support the aims of reducing casualties for all two-wheeler riders – so I will be counted as a 'supporter'. But I and many other broadly 'supportive' respondents strongly object to aspects of the plans that we do not see as being duly justified to date.

Thanks you for your patience if you have actually read all of this – and good luck with your decision. Whatever it is you'll need it.

Regards,

Dr Leon Mannings

Mayor's Roads Task Force

TfL CSH & Better Junctions for Cyclists DRG

Campaigns & Policy Adviser

Motorcycle Action Group (MAG)

Fact and fantasy of Embankment Traffic



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30th January 2015

Dear TfL Board member,

I am writing on behalf of the British Beer & Pub Association (BBPA)¹ and the Brewery Logistics Group (BLG)² in relation to the recent announcement of the introduction of cycle superhighways C2, C5, NS and EW, with construction starting in April and completion planned for spring 2016. The two organisations support the improvement of road safety for all road users in London and elsewhere, including for cyclists. We do however have a number of concerns about the implementation of these cycle superhighways that we feel need to be resolved before they are introduced.

The BBPA and BLG have been actively involved in TfL's consultation on the introduction of all cycle superhighways and dialogue is continuing. In fact we have a meeting on February 6th to discuss a specific major issue for our industry, which is detailed below.

Our main outstanding concern at present is around health and safety. Current legislation means that to deliver beer kegs the delivery vehicle must be parked outside the pub (or other building). It is estimated that around 100 delivery accounts are on proposed cycle superhighway routes meaning that deliveries will need to take place across the cycle superhighway. Clearly this is dangerous for both cyclists, who will face obstructions across the cycle way, and for delivery staff who will need to cross busy cycle lanes. The pub businesses will also be affected as it is conceivable that they will not be able to receive their deliveries, as distributors will decide that it is simply too risky to deliver to these premises under health and safety at work (HSAW) regulations, after carrying out the required risk assessment.

As well as this major concern there are still a number of other issues outstanding, such as the impact on delivery times and overall traffic patterns which could lead to an increase in commercial vehicles causing more congestion and emissions. The environmental and economic impact assessments have only recently been published and therefore there has not been vigorous scrutiny of the policy.

¹ The BBPA represents the producers of around 90 per cent of beer produced in the UK and the owners of around 40 per cent of pubs.

² The BLG's members account for around 75 per cent of beer delivered within the M25 – with a total of 1,150 vehicle days per week.

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As we previously mentioned we do not oppose cycle superhighways, but we do feel that there should be a hold on their development until there is a resolution on some of the key issues; principally the one about cycle superhighway safety from deliveries crossing the path of cyclists under HSAW regulations.

It could be a better option to trial some of these superhighways with removable markings that can be adjusted when tested and then implemented permanently when the proposals are finalised.

We remain keen to work with TfL to resolve the ongoing issues related to cycle superhighways and to increase road safety for all users.

Yours sincerely,

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BRIGID SIMMONDS OBE
Chief Executive

2nd February 2015

Dear Transport for London Board Members,

RE: Cycle Super Highway Proposals

Ahead of the Transport for London Board meeting on 4 February 2015 where members are set to discuss the Cycle Super Highway proposals, the Confederation of British Industry (CBI) would like to highlight business concerns regarding the project in its current form. We urge board members to ensure that the scheme is not rushed through to implementation, until we are certain that it works for all road users and businesses.

With so many Londoners getting on their bikes, improving the safety of cyclists is of paramount importance for the capital and is the reason why the CBI supports the principle of the Cycle Super Highway. The proposed scheme has raised concerns however amongst many of our business members who rely on a reliable road network and the successful delivery of goods and services across the capital.

We welcome the recent modified changes made by Transport for London to the proposals, however more business engagement and information must be delivered before the green light is given for construction.

Businesses have been inadequately informed and engaged throughout the consultation process. Key documents such as the environmental impacts and the business case were only published earlier this week when they should have been released alongside the consultation earlier in the year.

In addition, although new data shows that congestion impacts on the route have been reduced, we are still unclear on the wider impact of congestion across London and on feeder routes. Any threats to London's transport network must be fully communicated in advance to enable firms to plan strategically for the future.

CBI London urges the Transport for London Board members to review the current timetable for the scheme – which could see construction begin within the next few months. Additional time must be given to ensure that all stakeholder views are reflected in the final proposal to ensure a balanced network for both motorists and cyclists is implemented.

Yours sincerely,



Lucy Haynes
CBI London Director



February 2nd 2014

Dear TFL Board Member,

We at the GMB Professional Drivers Branch whose members are made up of Public Hire, Private Hire, Delivery, Courier Drivers and Emergency Vehicle drivers request your re-consideration of the Super Cycle Highway Plans before you make your final vote on the 4th of February.

It is our belief that major flaws exist in this plan and until a test of the entire route is carried out funds and construction should not be approved.

The 15,000 responses received have not been read fully in such a short space of time and as such the majority of views have not been considered in a fully democratic way.

There have not been trials of any sort to ascertain the full impact of traffic flows, accident rates, banned turns and the increased emissions effect on our great city.

As a result we expect increased journey times and emissions which we are sure you agree makes trials imperative for the safety and health of all Londoners, business travellers and holidaymakers.

Many business travellers complain when visiting London about delays reaching the capital.

With the plan as it stands we are sure further issues will ensue especially based on delays at Tower Hill when the Poppy Exhibit was ongoing.

We would also point out the same Hotels that will house the athletes for the 2017 IAAF championships are now marooned and will leave athletes with a further 10 to 15 Minute journey to reach them this is in addition to the business travellers who frequent them having extended journeys.

The Marathon route will be seriously challenged by the reduction in road space.

Distribution and delivery as well as Private and Public Hire journeys on the route will be seriously hampered especially where vehicles are delivering blocking a single lane.

Emergency vehicles will see an increase in journey times an issue which has already been newsworthy recently.

The scheme should it be agreed in its current form could prove disastrous on the economics of London and indeed of the whole of the UK.

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At the very least the start date of works should be postponed due to the added costs which have not been considered, that is to say that once the cycle highways are in place firstly there is no going back without a high cost to the public purse and secondly the fact that works on the so called Super Sewer and Garden Bridge will mean the digging up of the newly installed highway in a short space of time.

We feel that there needs to be a minimum of a 4 month trial to look at the needs of all Londoners which will cover different weather seasons.

The original tabulation of cycle figures was carried out in June a month when we are sure you would agree is when riders are at their peak.

What credence has been give and is this scheme a kneejerk reaction to what we all know are diminishing cycle accident figures overall in Greater London?

Pedestrian casualty rates are higher when compared to cyclists but this figure for whatever reason is rarely highlighted and may increase at junctions when riders ignore traffic signals on the new road layout.

We agree that cycle safety is a major priority but other quieter routes need to be looked at for the good of all.

We would contend that individuals opinions seem to have held more water than large interest groups who have the interests of many at heart and accordingly this has biased opinion of the planned routes.

Most cycle accidents take place at junctions at peak times and more often than not it involves HGV vehicles.

Perhaps a more pragmatic and economical approach would be to ban HGV and Delivery Vehicles at peak times Perhaps between 6AM and 7 PM which would ease traffic flow and will reduce rider casualties.

This would reduce congestion and emissions.

The cost to business would be minimal due to the savings of accident costs and lengthy road closures and the cost of the only cycle highway in Europe using a major though fare.

We again can only ask that you take into account the issues in this request before you place your final vote for the good of all Londoners and Great Britain Plc.

Yours Sincerely,



Steve Garelick
Branch Secretary.



02 February 2015

To: TfL Board Members

Dear Board Member

We are writing to you in advance of the TfL Board meeting on Wednesday 4 February when we understand that the proposals for the cycle superhighways schemes will be put before you for approval.

FTA and RHA support the superhighway approach in principle: the intention to engineer the roads to improve safety for cyclists, as well as to encourage more people to switch from private cars to bikes. However, it is essential that we achieve a sensible balance between the needs of different road users so that we make best use of limited road space to benefit London overall.

Whilst the plans published on 27 January 2015 are an improvement on the original proposals, we still have outstanding concerns about how the routes will work in practice.

These projects will be in place for decades and therefore more time should be spent now getting all of the aspects understood and correct before work begins. This has resulted in a rushed consultation period which had to be extended when it was noted that no journey time data was available when the consultative process began. We are still awaiting the full set of journey time data that we have requested in order to fully understand the impact on deliveries these changes will have. In addition, the economic and environmental impact assessments were only published last week when the consultation results were announced, rather than at the start of the public consultation period - these contain important pieces of information that we would want to discuss as part of a consultation process. This has meant that respondents have not had all of the information to fully assess the impacts of the scheme.

Our concerns with the proposals are two-fold – access to the kerbside for deliveries and servicing activity and any increases in journey times.

Delivery and servicing activity is manageable when delivering across a footway, where if necessary, cones can be used to provide a safety barrier for pedestrians. However, there will be significant challenges in using the same delivery methods across cycle lanes with cyclists travelling at far greater speeds than pedestrians. FTA and RHA are keen to see potential conflicts between cyclists and deliveries designed-out of the scheme at the beginning rather than a 'make-do' approach once the superhighway is in operation as it will undoubtedly create unnecessary tensions between cyclists - who will be led to believe that they have a right of way and delivery staff - who will just be trying to do their job as safely and efficiently as possible.

cont...

TfL has promised further discussion with the logistics industry to further adjust the schemes, but we believe that these discussions should be concluded before works start on the scheme. The schemes should start with a final design in place, and if any major problems for deliveries to a particular business are found, it would be better if this were done before works start on the infrastructure in question.

We not only concerned with journey times on the route itself, but the potential wider congestion impacts as a result of the use of 'gating' to manage the flow of traffic onto the cycle superhighway routes. Due to the constraints of EU Drivers' Hours rules, any significant increases to end to end journey times from outside London in to the centre is likely to result in reduced productivity per shift and therefore more HGVs on the capital's roads leading to increased transport costs, congestion and emissions.

This is not in any way a criticism of the staff at TfL who have been working hard to develop these plans under what are quite unrealistic timescales. Instead we wish to continue to work with them to help shape the plans to ensure they work for all road users. But in order to do this we need more time. So in conclusion, we urge members of the TfL Board to grant an extension to the current timetable for these important discussions to take place to ensure that the new infrastructure works as best it can for London's transport needs for decades to come.

Yours sincerely



Theo de Pencier
Chief Executive
Freight Transport Association



Richard Burnett
Chief Executive
Road Haulage Association



Howard Carter
Transport for London

By email:

[howardcarter](#) [REDACTED]

[jennifergourley](#) [REDACTED]

2nd February 2015

Dear Mr Carter,

I would be grateful if you would circulate this letter to the members of the Transport for London (TfL) Board in advance of the board meeting on 4th February.

I am writing on behalf of UPS to highlight our concerns about the proposals to establish cycle superhighways in London.

UPS is one of the world's largest logistics companies, playing a vital role in the collection, warehousing and delivery of goods. UPS provides critical national and international time sensitive delivery services for businesses of all sizes.

We are not opposed in principle to cycle superhighways but are concerned that the routes will create a significant impact on traffic, not just on the routes themselves, but also in the surrounding areas and further afield. UPS needs a reliable and efficient road network, ease of access, and confidence and certainty in congestion-free delivery routes to meet time-sensitive delivery times, and we are therefore worried that the proposed changes will have a damaging impact on our operations, and will ultimately hinder business growth in the capital as a result.

We welcome the revised plans which improve loading capacity, but we believe that a final decision on whether to proceed should wait until all consultations have taken place. We therefore urge TfL not to rush ahead with these plans without ensuring, in co-ordination with a full range of stakeholders, that all negative impacts of the scheme have been considered and are minimised. As you will recognise, this is a significant change to the infrastructure in London and it is vital that it works effectively and to the benefit of the Capital.

Yours sincerely,

[REDACTED]

Richard Currie
Director of Public Affairs
UPS

From: [Anne de Courcy](#)
To: [Carter Howard](#)
Cc: [Gourley Jennifer](#)
Subject: Cycle Superhighways in London
Date: 02 February 2015 18:42:37

2nd February 2015



Association of International Courier & Express Services
Global Logistics Centre, Horton Road,
Colnbrook Berkshire SL3 0DL
Tel: 44 (0)1753 680550
Email: info@aices.org www.aices.org

Dear Mr Carter,

I would be grateful if you would circulate this letter to the members of the Transport for London (TfL) Board in advance of the board meeting on 4th February. I am writing on behalf of our Members to request a meeting in order to discuss our concerns about the proposals to establish cycle superhighways in London.

The Association of International Courier and Express Services (AICES) is the UK trade organisation for companies handling international express documents and package shipments. Our members provide door-to-door transport and deliveries of tracked next-day or time-definite shipments, including documents, parcels and merchandise goods. In order to meet the demands of London businesses for reliable and efficient express services, AICES members need a road network which enables predictable journey times and access to deliver and collect to meet time-sensitive delivery times. Speed and reliability are absolutely crucial if London is to remain competitive in the international market place.

AICES supports TfL's objective to ensure that cycling in London is safer and where possible to ensure properly segregated lanes. AICES responded to TfL's consultations on the new segregated East-West and North-South Cycle Superhighways through central London. We very much welcome the decision by TfL to revise its plans to improve loading capacity which was raised in our submission. However, our Members are extremely concerned that a final decision on implementation of the scheme could be taken ahead of all consultations with stakeholders having been concluded.

There is no doubt that the plans for the cycle superhighways will significantly change the transport infrastructure in London and it is therefore vital that a considered consultation process takes place engaging with all interested parties. AICES would therefore urge the Board to await the outcome of the on-going discussions in order to ensure that the full impact of the scheme is properly understood and any potential negative ramifications are minimised.

Yours sincerely,

Anne de Courcy
Secretary General

Click [here](#) to report this email as SPAM.

From: Stephen Glaister [mailto: [REDACTED]]
Sent: Tuesday, February 03, 2015 05:41 PM
To: Hendy Peter (TfL)
Subject: E-W cycle super highway

Dear Sir Peter,

I refer to the published paper for the TfL Board meeting on 4th February 2015 (tomorrow):
<https://www.tfl.gov.uk/cdn/static/cms/documents/board-20150204-part-1-item-07a-propose-csh-scheme.pdf>

I hope that during the proceedings of the TfL Board, you will ensure that members' attention is drawn to the business case appraisal of the E-W Cycle Super Highway at paragraph 5.53 where the proposal is to spend £38m of public money and generate DISBENEFITS of £200m.

And this is before accounting for the bus priority money that is to be used in mitigation, that would have had alternative, productive uses.

I cannot imagine that, in the past, the Board would have countenanced an Underground, bus or road investment with this kind of economic performance whatever its merits. HM Treasury would certainly not be happy and, at the end of the day, this is incremental central government grant.

Of course I acknowledge that the business case is by no means the only consideration. But, on my quick reading the poor economic performance is because the costs to the disruption to traffic (including buses) outside the relevant area overwhelm the benefits from all sources within the area.

This is a reflection of real damage to bus users, business and commerce in the heart of a world financial centre which is a vital engine of economic prosperity for the UK economy.

Kind regards

Stephen

Stephen Glaister CBE PhD FICE FTRF FCGI

Director
RAC Foundation

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3 February 2015

TfL Board Members

Dear Board Member,

I am writing to you about the proposed cycle superhighways scheme that is due to be discussed at the TfL Board meeting tomorrow. As DHL is the world's largest logistics company, the proposal is of great interest to us and I would welcome the opportunity to contribute our perspective before you make a final decision.

We support and appreciate your work to make London's infrastructure safe for all road users, including cyclists. However, we share the concerns of the FTA and the RHA about cycle superhighways. Their analysis suggests that the proposed scheme could lead to increased travel costs, emissions and traffic within London. From our perspective, this could lead to longer delivery times.

Before you and your colleagues make a final decision about the proposed scheme I would greatly appreciate the chance to share our thoughts on how London's roads can be made safer and more efficient for all users. I would be very grateful to you and your colleagues on the TfL Board if you were able to grant an extension to the current timetable. Thank you for your consideration.

Yours sincerely,

A solid black rectangular box redacts the signature of Sharon Davies.

Sharon Davies
Senior Director of Corporate Affairs

Mr. Boris Johnson
Mayor of London
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

4 February 2014

Re: East West Cycle Superhighway Consultation

LCCI acknowledges the work undertaken by Transport for London (TfL) to make changes to the East-West route as a result of the consultation feedback, for example lifting traffic restrictions on Fish Street Hill, Horse Guards Road and Storey's Gate. However, we believe TfL's response does not sufficiently address the substantial concerns raised during the consultation. These include increased journey times and other impacts on motorised traffic, in particular freight servicing and deliveries.

LCCI still has concerns about the consultation process. We wrote to the Mayor on 17 September about the length of the consultation process, and limited documentation available for respondents to make a fully informed assessment about the benefits of the scheme. While TfL did subsequently extend the consultation period from the original six weeks, and provide limited traffic impact data, this was only after LCCI and others had engaged the media. Despite requests, full documentation about the economic and environmental impacts was not made available to those responding to the consultation.

Both the environmental impact assessment and business case have only just been published a week before the TfL board meeting on 4 February. TfL explained that an environmental impact assessment could not be published prior to this as the scheme was still in flux. However, it is LCCI's view that the scheme has not changed sufficiently during the process – it remains TfL's preferred route – for the impact assessments not to be published with the original consultation.

TfL have admitted that a full economic impact assessment for the East-West Cycle Superhighway has not been completed. In order to enable respondents to make informed comments, full disclosure of the economic impacts would have been welcome at the time of consultation, particularly as the overall cost benefit ratio for the scheme is negative. The negative impacts of the scheme on London businesses therefore could be significant.

Mr Elliot Moss
Chairman, LCCI Economy and Enterprise Policy Committee