

Mayor of London's Air Quality survey: Cleaning up London's air pollution ~ Response from Campaign for Better Transport

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to respond to the Mayor's Air Quality Survey and initial proposals for cleaning up London's air pollution.

Air pollution is a public health emergency that demands urgent action. Lethal and illegal levels of air pollution are causing a health crisis in London and across the UK, causing thousands of premature deaths as well as life-limiting conditions, particularly for children exposed to pollution with homes and schools near fume-filled roads.

London is the dirty diesel capital of Europe. Its main roads break EU legal standards on pollution every year. Action is long overdue. The legal case brought by Client Earth has added further pressure to national and local government to act. We welcome the Mayor making this vital issue an early priority.

The Ultra Low Emission Zone

We support the early introduction of a wider Ultra Low Emission Zone and its extension to the North and South Circular initially, with potential to extend it further. The Mayor's proposal for bringing forward the ULEZ to September 2019 from 2020 is welcome but we believe could go further and faster.

Before the mayoral election we, along with other environment groups, called for a range of measures including making every bus in central London zero emission capable by 2018: as a minimum all new single decker buses should be electric and all new double decker buses should be zero emission capable in that timescale. Funding from the proposed "t-charge" and an expanded Ultra Low Emission Zone could contribute to the cost of cleaning up London's buses and taxi cabs.

We believe that both light and heavy vehicles should be ULEZ-compliant; we agree that the ULEZ should extend, as a minimum, to the North and South Circular Roads, and should be extended to cover London as a whole as soon as practicable.

Diesel scrappage scheme

We support calls for a national diesel scrappage scheme, but believe this must be carefully designed to encourage modal shift from car use to sustainable transport use, not simply a subsidised upgrade of private vehicles. The scheme should be designed to incentivise switching of private vehicles to car clubs, public transport usage or active travel, for example through a voucher scheme.

Freight vehicles are a major source of diesel emissions and urgent action is needed to encourage the switch to rail and water for longer distance freight and for smarter last mile delivery, making better use of area-wide servicing plans, hyper-local consolidation centres, and low emission delivery options including cargo bikes and electric shuttles.

For buses and taxis, the Mayor can and should take action independent of any national scheme. The Mayor has a role in delivering the solution as well as imposing the regulations, through TfL's role as commissioner of bus and taxi services in the capital. Although a vital part of the public transport network, diesel buses and taxi cabs are major polluters, and we look to the Mayor to lead by example in facilitating and incentivising green procurement.

Vehicle Excise Duty

We support calls for a proportion of Londoners' Vehicle Excise Duty to be retained for spending on London's transport infrastructure. It is wrong that all the proposed Roads Fund should be earmarked for the Strategic Road Network outside London at the expense of local highways authorities across the country as well as the capital. Potholes are more of a priority than grand projects.

Roads Fund money for London would help fund improved transport corridors for buses, coaches, pedestrians and cyclists, joining up with the Government's Cycling & Walking Investment Strategy, and contribute to a better environment for Londoners through measures to improve safety, reduce congestion and tackle air pollution.

Pedestrianisation

We strongly support measures to extend pedestrianisation to London's high streets, including Oxford Street, and local centres, along with improved networks of walking and cycling routes between local centres and across central London. This must be co-ordinated with bus route planning and design to deliver an integrated public transport system that complements active travel options.

The national government's recent draft Cycling and Walking Investment Strategy takes note of the multiple social, environmental, economic and health benefits of walking and cycling. We have seen the dramatic increase in cycling levels in London following the introduction of dedicated cycle routes. Better provision for these active travel modes will stimulate modal shift, improving air quality and tackling congestion, and creating a more liveable London.

Emissions Surcharge

We note that ahead of the implementation of the ULEZ in central London in 2020, the Mayor has proposed the introduction of an Emissions Surcharge, to be introduced in 2017. The Emissions Surcharge would be a daily charge that would reduce emissions by reducing the number of the oldest most polluting vehicles driving at peak times in the Congestion Charge Zone.

We support the early introduction of an emissions surcharge, the so called "t-charge". However, we are concerned by the assumption that more recently registered diesel vehicles are reliably cleaner, given the Volkswagen emissions cheating scandal and wider revelations that over 90% of modern diesels emit illegal levels of pollution in real world driving conditions as opposed to in laboratory tests. We therefore believe that newer vehicles should also pay the charge.

If the emissions surcharge is to be effective in tackling London's lethal and illegal air pollution, then limiting it to certain times of day is pointless: it should operate all the time, without resident exemptions, and the proceeds used to invest in providing greener travel alternatives.

We note that the argument is sometimes made that such charges would discriminate against lower income users, as any fixed charge is inevitable regressive in nature. However it is important to note that the lowest income Londoners are both least likely to own or have use of cars, and are most likely to suffer the ill effects of air pollution.

To tackle air pollution at roadside requires moves to phase out all diesel and petrol vehicles. While a charge will be a disincentive to bringing polluting vehicles into central London, it will be less effective than a total diesel ban, which should be the longer term policy goal.

Electric vehicles

Electric vehicles (EVs) are not a panacea. They take as much road space as any other vehicles and the charging infrastructure adds to competition for kerb space. The source of the electricity generated may not be any greener than conventionally fuelled vehicles. However, EVs are an important part of the solution to air pollution at roadside. Providers such as car clubs and private hire companies need certainty of provision in order to make strategic procurement decisions to convert their fleets to EVs. Therefore the Mayor and TfL

must ensure that there is an EV charging network for London that is accessible, reliable and affordable and that clear and deliverable commitments to this are made to potential users.

Freight and Heavy Goods Vehicles

Freight is a key area of action, and any plan for tackling air pollution, and also congestion, must include making better use of rail and water for longer distance freight. Putting rail at the heart of freight policy can help reduce air pollution as rail freight produces almost 90% less PM10 emissions than road freight and up to fifteen times less NOX emissions. Transfer to rail can reduce road maintenance costs as HGVs have an adverse impact on road infrastructure, with heavier HGVs up to 160,000 times more damaging to roads than the average car.

There is suppressed demand for rail freight due to lack of capacity on the rail network. As TfL sets out overarching spatial planning as well as transport planning across the capital, it is imperative that it gives the boroughs clear guidance on the need to protect future potential sites for rail freight interchanges of all sizes.

Two important trials bringing trainloads of freight into Euston, the heart of London at night when the station is closed for passenger services, demonstrate the potential for consumer rail freight to be transported in a safer low carbon mode which reduces road congestion and air pollution.

To tackle the growth of Large Goods Vehicles for retail fulfilment, there needs to be an accelerated rollout of smarter last mile delivery and area-wide servicing plans, including local and hyper-local consolidation hubs, and use of ultralow or zero emission last mile delivery vehicles (for example cargo bikes or electric shuttles).

Encouraging walking and cycling is crucial to improving London's air quality, so as part of an air quality plan, controls on HGVs need to address safety as well as emissions. Longer and heavier lorries (currently being trialled outside London) should be banned from the capital and any HGVs entering London should be required to have full visibility cabs.

Demand management

Nottingham has shown how the introduction of a workplace parking levy can be a success. A work place parking levy for business districts such as the City of London, Canary Wharf/Isle of Dogs and the Royal Docks would be an important contribution to managing demand, tackling both congestion and pollution and providing a dedicated revenue stream that could be shared with boroughs, Business Improvement Districts or strategic landowners to enhance public transport and the public realm to mutual benefit.

The introduction of the emissions surcharge and ULEZ charging, combined with existing congestion charges and other charges, makes the case for introducing a vehicle passport for London. By combining the various charges, and with potential to incorporate Vehicle Excise Duty, parking charges and other insurance and licensing costs, this could see London lead the way in smart road user charging just as the Oystercard led the way in smart ticketing. It would enable London to tackle both pollution and congestion in a smart and transparent way, while generating vital revenue for greener transport alternatives.

Plans for new roads, including road-led river crossings at Silvertown, Gallions Reach and Belvedere, should be reconsidered. The induced traffic effect of new infrastructure is well established (and seen to good effect with the cycle super highways). New roads generate new traffic. Without a ban on private motor vehicles and a 100% green public transport fleet, even a marginal increase in traffic levels on new roads in these already densely-populated and relatively deprived areas will make existing air pollution worse. While we understand and support the aims to improve regeneration and connectivity in east London, this is better achieved through managing demand on existing roads and investing in better public transport, walking and cycling instead.

We believe such a package of measures would have wider social and economic benefits for London as a whole, and commend them to the Mayor.

August 2016

Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
Registered Charity 1101929. Company limited by guarantee, registered in England and Wales: 4943428