

Mayor's Climate Change Consultation
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COMMENTS FROM CAMPAIGN FOR BETTER TRANSPORT ON THE DRAFT CLIMATE CHANGE MITIGATION STRATEGY

Campaign for Better Transport broadly supports Policies 10, 11 and 12 which seek to promote a shift to more efficient modes of transport, improve the efficient operation of transport and encourage the use of low carbon vehicles and technologies. We do not intend to comment in detail on the draft Strategy but offer the following general comments.

Transport should make a fair contribution

CO₂ emissions from transport should be reduced by the same proportion as emissions from other sectors. We see no reason why emissions from, for example, housing should in effect have to be cut further in order that inefficiencies in the transport sector should continue.

The need for traffic reduction

A policy in favour of traffic reduction, backed by targets, is the major omission from the Climate Change (and Transport) Strategy. It is not enough to seek to reduce emissions from traffic by making engines more efficient or by encouraging a shift from the car to the other modes. Only by reducing existing levels of motor traffic can efforts to promote healthier life styles and a better standard of urban design be made most effective. We note that the draft Strategy states the Mayor's intention of 'reviewing the option of road user charging and / or regulatory demand management measures'. The wording is much too weak. The Strategy should say that the Mayor will sell the need for, and benefits of road user charging.

Integrating transport and land-use planning

There is a continuing need to ensure that new developments have the intended transport consequences. Proposals coming forward for 'opportunity areas' (Brent Cross Cricklewood and Battersea Power Station for instance) are not taking advantage of the potential to reduce transport impacts and CO₂ emissions from transport, to reduce the need to travel, create good urban design and promote healthier forms of travel. Reducing the provision of parking, ensuring good access by public transport and using new development to help weave a fabric of walking and cycling routes are all of critical importance. The opportunity areas should become urban 'eco-quarters'; this is not happening.

Promoting the most efficient public transport

We need to look at meeting more public transport needs through the use of rail rather than by less energy efficient 'rubber on road' public transport modes. TfL should be required to carry out a thorough and unbiased investigation of the case for lower cost light rail schemes that could replace buses on busy routes in the medium and longer term. This is not simply a matter of reducing emissions; it is also a means of improving the quality of the public realm and creating a public transport system which can maximise a shift from the car.

Reducing CO₂ emissions from freight

Improving conditions for freight transport is often overlooked. Efforts to encourage the use of electric vehicles (which we have some misgivings about as it might not contribute to traffic reduction, or the achievement of some health and urban design objectives) appear to concentrate on cars rather than commercial vehicles. More light goods vehicles particularly should be electric powered. Neither are we satisfied that enough is being done to shift freight movements to rail and water. Both the Climate Change Strategy and the Transport Strategy should provide more detail on how this is to be achieved.

Aviation emissions

Though most emissions from aviation are not included in total CO₂ emissions for the purposes of this Strategy they are obviously critical. We welcome the Mayor's opposition to the expansion of Heathrow. This should be extended to other airports. We also favour a shift from air travel to rail but we note that current high speed rail proposals would not necessarily cut overall carbon emissions and might increase them.

We hope these comments are helpful and would be pleased to enlarge on them if that would be useful.

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