

Rory Stewart MP
Parliamentary Under-Secretary of State
Department of Environment, Food & Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR

18 August 2015

Dear Mr Stewart

Air Pollution and Transport

I'm writing to belatedly congratulate you on your appointment and to urge you to take action to cut air pollution from transport in the wake of the recent Supreme Court decision.

Campaign for Better Transport is an environmental campaign group that promotes sustainable transport policies. You may remember that we had some contact over the Total Transport pilots; we have been deeply involved in promoting better public transport and seeking ways to give people more choices in their travel so as to reduce car and lorry traffic. We carry out research and also work with a very wide range of groups on transport issues.

We see the Supreme Court decision and the forthcoming Air Quality Plan as an opportunity to tackle air pollution systematically and in doing so make our cities attractive places in which to live, work and invest. I thought it might be helpful if I set out some measures and programmes which we believe the strategy should cover in tackling the pollution from road traffic.

The pollution issues, and the solutions needed, have changed in recent years as the scientific research has brought new findings on the harm to human health caused by different pollutants. The measures in the Government's new Air Quality Plan need to focus not just on reducing the pollutants from individual vehicles but also on reducing pollution from transport overall, especially in cities. Our concern is that it should include measures from other departments and in other areas of Government policy, such as fiscal reform, devolution, local growth/city deals, rail investment and the Northern Powerhouse. If the plan does not make these links, it will risk missing the targets or relying too much on a narrow range of measures.

We are aware that measures already under discussion include:

- **Low Emission Zones/ Ultra Low Emission Zones:** these can be effective in deterring vehicles that do not meet prescribed standards from areas of high air pollution. However, Government should provide greater powers to local authorities with them and allow the zones to be tightened

- progressively in order to meet the targets. The Environmental Audit Committee recommended a national framework for LEZs in its report on air pollution last year.
- **Support for tighter vehicle emissions at the EU level:** in Europe the Government should support lower targets for vehicle emissions and support the creation of mandatory targets and emission standards for freight vehicles (as the US is already doing). One problem you face here is the unreliability of the current test cycle for cars; we appreciate that the Government is supporting reform and that a more reliable test is due for introduction in 2017, but it's unclear how far this will in fact produce reliable indicators for the public and policy makers.
- **Promoting low/ zero emission vehicles:** the Government has an existing set of programmes devoted to getting lower emission vehicles adopted, including the Green Bus Fund, and various grants for low carbon/zero emission vehicles.

In addition to these policies towards changing the vehicles on the road, there has also been discussion of other measures, such as changing planning guidance to discourage the building of new developments near air pollution hotspots.

However, we believe that on their own these will not be enough to deal with the problem, especially in the short term. As the Supreme Court judgement itself suggested - based on what is recommended by the Directive - a wide range of other measures need to be considered and we make some proposals below.

- **Increasing cycling and walking for shorter journeys:** 77% of car journeys are less than 5 miles and many could transfer to walking and cycling. The Government is already committed to putting in place this year a "Cycling and Walking Investment Strategy", and has national targets for doubling cycling in England and increasing the percentage of walking journeys to school. Funding for cycle routes and good pedestrian networks will translate into much bigger mode shifts in urban areas and potentially make a large contribution to achieving pollution targets.
- **Increasing the use of public transport in cities:** there are a wide range of ways in which the Government can encourage this, including the planned "Buses Bill" and associated measures that will allow authorities to franchise bus services as in London. Agreements in principle have already been reached with Greater Manchester and Cornwall to allow this. You could also use franchising and other reforms in the Bill to reduce pollution from buses by including low emission vehicles as a requirement in franchises or in bus registrations. Other measures, such as bus partnerships, multi-operator tickets and Oyster-style smartcards, can help a shift more urban journeys from cars to public transport.
- **Improving freight management in cities:** some projects are already under way to manage freight better in UK cities. For example there are existing or planned "consolidation centres", which put goods into smaller and less polluting vehicles for local delivery. Some cities have been promoting cycle couriers and zero emission freight distribution vehicles, and there have been experiments with running freight trains into city centre stations at night to enable more local distribution. The new Air Quality Plan should further develop these kinds of "last mile" initiatives as a highly targeted way of reducing pollution in cities.
- **Managing and reducing urban traffic:** measures to achieve this include local parking controls and charges, redesigning streets to give more priority to pedestrians, cyclists and public transport, and managing traffic more actively and intelligently. New technology makes this easier and some measures are already being applied in cities here and in other countries. Government should give extra powers to local authorities to help this - for example activating part of the 2004 Traffic Management Act would allow councils to enforce traffic management properly. Cities should also be

encouraged to use existing powers in this area - Nottingham has already implemented a levy on workplace parking spaces and used the revenue to fund a fleet of electric buses and new tram lines.

- **Smarter choices and sustainable transport programmes:** integrated measures to change travel behaviour and improve travel choices for people can include car clubs, bike hire schemes, marketing programmes, travel plans for schools and workplaces, as well as the measures to increase walking and cycling and improve public transport already mentioned. There is now good evidence that these programmes work, following the Local Sustainable Transport Fund which was started under the last Government and which has supported a very wide range of schemes of this type. The forthcoming Spending Review should continue the funding for this programme and the new strategy should include commitments to continue and extend it to all areas of high air pollution.

A key point to make is that much of this is already in the Government's emerging plans, as part of its agenda for devolution and the "Northern Powerhouse" (which will also include devolving control over local rail services there and improving these too). It is also important to stress that all these programmes have a large number of other benefits - in terms of helping the economy, reducing congestion, and improving public health and road safety. The Air Quality Plan can and should link with and consolidate these measures; if pursued more vigorously and in the form of strategic alliances with city-regions, you can deliver significant reductions in air pollution and a robust and integrated plan that will be fully compliant with the legislation and the Supreme Court's judgment.

Finally, we recommend three overarching actions the Government can take that should be included:

- **Taxation measures:** company car taxation should be adjusted to give incentives to buy and run low emission cars of all kinds. Currently the system doesn't reward these sufficiently and the overall charges on company cars are in fact significantly below the value of the benefit now, leading to incentives for increased driving. You could subject vans to graduated vehicle excise duty, similar to the first year system introduced in the recent Budget for cars. The data to underpin this is now available and this would over time make an appreciable difference. Heavy Goods Vehicles already have a levy applied to them – you could extend this into a broader charging regime that could incentivise lower emission vehicles and better freight operations (as other countries have done).
- **Auditing Government transport programmes:** in particular, we believe that the programme of road schemes in the Government's Road Investment Strategy needs to be revisited to ensure that it contributes to the reduction in air pollution needed, with the most damaging schemes that add to breaches in cities amended (for example with lower speed limits) or removed. In addition, we believe that Local Enterprise Partnerships should be asked to audit the consequences for local air pollution of their economic programmes, which include significant transport investment, and to give priority to investments that will help cut air pollution. If LEPs and the new Combined Authorities espouse economic and land use planning policies that locate new developments around public transport services, this will also help reduce car mileage and pollution. In addition, the forthcoming decision on airport capacity in the South East will clearly need to take the air pollution implications very seriously. By contrast, the planned investment in the railways, especially in rail electrification and the strategic freight network, should have positive effects on air pollution and these benefits should be counted in their business cases.
- **A smarter Spending Review:** any air quality plan will need to be underpinned by public spending decisions. The forthcoming Spending Review should protect and prioritise new funding for programmes and measures that will cut air pollution, such as grants for low emission vehicles and the Local Sustainable Transport Fund, over programmes and schemes that will increase it or at least not help. Given the constraints on public spending, it might be helpful to look at cross-Government funding where multiple departments will benefit from a programme. There has already been

discussion about, for example, a cross-Government Active Travel fund, as well as a “Connectivity Fund” for local public transport, building on the Total Transport approaches. A cross Government fund to cut air pollution is also be worth considering here.

We have listed above a very wide range of measures that can help cut air pollution in cities. This is not to downplay the importance of measures already under discussion in relation to LEZs and the tightening of standards; it is vital that the Government promotes lower emission vehicles and ultimately a move away from the use of diesel cars altogether. However, these measures are unlikely to be enough on their own, especially in the short term. The Air Quality Plan should look at ways they can be developed so as to maximise their effects on cutting pollution and produce a plan with certainty over its effectiveness.

We would be happy to discuss all this further with you. If appropriate, we would be happy to bring together interested parties, including representatives from city transport authorities, in a round table to discuss the Strategy and the range of measures that it can and should include.

Yours sincerely

A handwritten signature in black ink that reads "Stephen Joseph". The signature is written in a cursive, slightly slanted style.

Stephen Joseph
Chief Executive