Caroline Russell AM
City Hall
The Queen's Walk
LONDON SE1 2AA

Secretary of State for Transport, The Rt Hon Grant Shapps MP
Great Minster House
33 Horseferry Road
London
SW1P 4DR

27 August 2020

Dear Grant,

Decarbonisation of Transport

We are at a crucial time for transport policy – demand for public transport has slumped and capacity is reduced to a fraction of normal because of the on-going need to keep our distance, while traffic on UK roads has already returned to normal levels seen outside of summer holidays. As the UK recovers from the impacts of the coronavirus pandemic it must also address the climate emergency and ensure disruption to travel patterns is used to encourage moves to cleaner and more sustainable options and that transport infrastructure is resilient to the effects of climate change: extreme heat and cold, extreme rainfall and flooding.

I have submitted the following responses to your online consultation on the Transport Decarbonisation Plan, these outline how to reduce greenhouse gasses and are structured with a heading for each area in turn.

Cars
Addressing the need to travel, and the impact of that travel, is crucial to getting decarbonisation right. Reducing forced car ownership[1], where a significant minority of people in the UK feel they have no option but to own and use a car would have a huge impact on emissions. Even those who don't feel forced into owning a car experience pressures that encourage them to use them more. The first way to tackle this is to consider the way we provide goods and services to people, and ensure that for most people, everything needed for normal daily life can be reached within a 15 minute journey on foot from home.

[1] YouGov survey commissioned by Caroline Russell AM into forced car ownership https://www.london.gov.uk/press-releases/assembly/caroline-russell/1-in-5-londoners-feel-forced-to-own-a-car

Too much policy on cleaning up emissions from cars has focussed on replacing existing cars with new ones. In 2019 the average emissions of new cars sold in the UK was rising for the third year in a row, up 2.7% year on year to 127.9g CO_2/km [2]. This is a reverse of progress made in earlier years, including when the Department for Transport reported on this as a key goal in the business plan from 2012-2015[3]. The emphasis in the current departmental plan is on the transition to zero emission transport and making the UK the best place in the world to develop and manufacture zero emission vehicles[4]. There needs to be far clearer leadership from the government that emissions from vehicles must reduce, both per vehicle and overall if the UK is ever to have a world leading position on road transport, let alone reduce emissions quickly in the face of the climate emergency.

For the general public it is far easier to get finance and assistance to buy an SUV, or other large car, than to move to an electric vehicle or swap from using a car to using an electric bike or cargo bike. Financial incentives must be aligned carefully to avoid subsidising more emissions, at a time when emissions must be reduced.

In our cities especially, it should not even be necessary to own a car or van. This should be both because public transport and walking and cycling are convenient and safe, and also because car club vehicles are available easily as and when they are needed. Car and van sharing schemes should be supported, including with dedicated charging points to enable operators to transition to zero emission vehicles at the earliest opportunity. In London the state aid rules have been an obstacle to investing more than €200,000 in charging points over a three year period[5], and any future state aid controls should not prevent support for sustainable modes.

Shared vehicles using on-street charging points are a good way of providing access to electric cars for occasional use and charging points to those living in dense urban areas without their own driveway. Given the increased likelihood of extreme weather such as intensified rainfall, it is important that owners of electric cars do not feel incentivised to pave over front gardens for parking and charging. Losing green space that can soak up rainwater in front gardens will negate other work in the urban realm like installing Sustainable Urban Drainage Systems to reduce the load placed on our sewers by extreme rainfall.

Carbon emissions are not the only emissions from vehicles, and in order that air pollution is reduced, much more should be done to aid modal shift from driving to walking and cycling. Emissions from brakes and tyres will continue even with electric vehicles, and as these may be heavier, they may provide worse particulate pollution than the vehicles they replace.

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[2] SMMT Figures, January 2020 https://www.smmt.co.uk/2020/01/record-year-for-zero-emission-cars-fails-to-reboot-uk-market-as-sector-calls-for-supportive-policies-to-boost-uptake/

[3] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/3367/dft-2012-business-plan.pdf

[4] https://www.gov.uk/government/publications/department-for-transport-single-departmental-plan/department-for-transport-single-departmental-plan--2

[5] London Assembly Environment Committee report on Electric Vehicles, May 2018 https://www.london.gov.uk/about-us/londonassembly/meetings/documents/s70697/Electric%20Vs%20in%20London.pdf

Scrappage schemes are a reasonable option to help with the move away from polluting vehicles, but they must be focussed on addressing the most polluting vehicles, and include a heavy emphasis on mobility credits for use with public transport, and support to move to truly sustainable options like walking and cycling.

Even for those who do not feel forced into car ownership, the way that transport is priced is encouraging more emissions. Car ownership and car use has got cheaper in real terms while public transport has got more expensive since 2013, with an acceleration in that trend since 2017[6]. We need a radical overhaul of the way that people driving pay for their impact on their community and the planet to enable more of a shift to active travel modes. The only way to do this fairly in the long-term is with smart, fair, privacy-friendly road pricing.

Smart, fair, privacy-friendly road pricing combines charging for roads with all of the social and environmental impacts that driving can have – it lets us charge not just for emissions, but also for using space on the road, causing congestion and encourages the retiming of journeys to quieter times of the day when their emissions impact can be somewhat reduced. The government must support TfL in bringing in road pricing both as a revenue source to invest in alternatives to the private car and to help London tackle the growth in congestion[7], which risks creating more pollution as we recover from the pandemic.

Buses and Coaches

Concerns about air pollution have led to some progress in UK cities on moving bus services in towns to lower emission vehicles. Transport for London now has 90% of bus vehicles on their timetabled services up to a low emission standard and aims for 100% by October of this year.

The UK has a large bus and coach manufacturing industry, and the government should do more to support development and delivery of electric buses. High quality bus services across the country could be supported by new buses. Suitable investments in charging points for buses should be accompanied by the modernisation of bus depots from being polluted and unpleasant places to healthy and supportive environments for bus drivers with decent toilet facilities and restrooms.

Freight

There is a continuing growth in home deliveries, most recently as online ordering grew during lockdown. It is important that deliveries are made in the most sustainable way possible, especially on short last mile journeys. Some of the best progress on freight in cities has come from Business Improvement Districts such as in London's West End where they have worked to consolidate deliveries to reduce lorry and van movements, which also reduces congestion, road danger and air pollution.

Providing appropriate spaces for freight consolidation and local delivery hubs is an important way for planning to support sustainable vehicles being used in freight movements. Space should be safeguarded for these uses within all town and city centres, as

[6] RAC Foundation Transport Price Index http://www.racfoundation.org/data/cost-of-transport-index
[7] https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic

caroline.russell@london.gov.uk 020 7983 4388 @carolinerussell

it enables a much more rapid shift to the use of electric and cargo bike vehicles for last mile delivery.

Aviation
Flying is one of the most carbon intensive ways of travelling. It has impacts both locally – with noise, pollution and surface transport congestion – and globally as it warms the climate with emissions from aircraft.

Here in London, people suffer severe impacts from noise and air pollution caused by the movements of aircraft over their homes and surface transport to reach airports outside them. Recently we have seen the modernisation of flight paths used to concentrate aircraft movements, exposing overflown communities to intensified noise in an attempt to increase aviation capacity. This is not acceptable, especially when there are already issues from the other impacts of aviation.

Electrification of aviation is speculative, and likely to only be possible on low capacity routes in the near future. Electrification should be used to lessen the impacts of aviation, not as a means to increase the use of such a carbon intensive mode of travel.

Far too much long-distance travel in the UK currently uses domestic aviation. We also have efficient access to many European destinations by train, and we should be using more of that capacity.

Local Journeys
There is a real opportunity to cut carbon with action on local journeys by making it safer and easier to walk and cycle and a bit less convenient to use a car. Cutting traffic where people live makes it more likely they will access nearby amenities and shops on foot and by bike. Initially lockdown saw a strong growth in cycling, but as motor traffic has increased, that increase in cycling, across the UK, has lessened to just a small improvement[8]. In London, and other places that have provided safe space for cycling this growth has been retained somewhat, but much more investment is still needed everywhere.

Low Traffic Neighbourhoods, where every home is accessible by car, but you cannot cut through from one main road to another, are a key policy tool in decarbonising transport, as well as reducing road danger and pollution and boosting public health. Residential streets simply do not have the capacity to be used as through routes for motor traffic enabled by sat nav and apps like Waze, but they can form the basis of a local network that supports more walking and cycling. Cutting motor traffic for local neighbourhoods benefits people of all ages and can help make streets safer, more friendly and more inclusive.

Reworking local streets can also support adaptation and wider environmental goals. Road space can be reallocated to green features, with more street trees for shade and shelter along with rain gardens and space to play and park cycles. All of these measures provide for a more resilient street that is more pleasant to walk down on a sunny day, handles heavier

[8] https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic

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rain without overwhelming drains and enables local people to meet each other and use more sustainable means of transport.

Adapting the neighbourhoods in which we live to a more local way of life, will breathe new life into communities. High streets that people walk along are more active than those that are driven to, and the pleasant and easy experience of popping into a series of shops is a simple and enjoyable way to engage with local businesses. Every successful filtering scheme is best showcased by the way that high streets, parks and streets outside schools become calm and pleasant environments that people want to linger in.

We also need to see investment to remove the severance that main roads can cause. Every main road must have facilities for people walking to cross safely at regular intervals, and no road with heavy traffic should expect people cycling to be in that heavy traffic without protection in the form of a physically separated bike lane.

Longer Journeys

Electrification of rail has been possible for decades, but the UK has failed to keep pace with best practice across the world. The majority of the UK rail network by km is still not electrified. A rapid programme using regular investment should be put in place that moves rail to full electrification by the earliest possible date.

The cost of rail travel is a deterrent to using rail for domestic journeys. The Williams Rail Review has rightly noted the need for a new structure. It is important that the price of travelling by rail is more affordable than flying. Travel demand should be serviced by the cleanest mode. This can be achieved by using price as a signal, by properly pricing the carbon emissions of aviation and by supporting cleaner travel in electric trains. Electrification should be accompanied by a programme to ensure that rail uses renewable power, including generation of power using wind turbines and solar panels adjacent to the railway. Climate adaptation will necessarily involve the reprofiling and engineering of many Victorian railway cuttings and embankments to be resilient to climate change and extreme weather, so it would be prudent to accompany this with maximising the potential electricity generation of these structures.

Procurement of power for rail is an opportunity to support new renewable power generation through power purchase agreements. Until recently Transport for London used just 0.01% renewable energy but is now addressing this through the use of power purchase agreements[9].

Switching longer journeys away from cars may involve multiple modes of transport which needs integrated transport planning. Our rail stations are far less dependent on car journey access than airports. With investment in local public transport, active travel networks and cycle hire pressure on station car parks can be reduced with more people enabled to reach their local station on foot or by bike. By thinking holistically about longer distance journeys in the UK, their impacts on the environment can be reduced, which will benefit everyone.

[9] TfL finally goes green!, July 2020 https://www.london.gov.uk/press-releases/assembly/caroline-russell/tfl-finally-goes-green

Final Comments

The current approach to appraisal of the carbon impacts of investments is too weak. Projects should be challenged on the real world impacts of their effects on travel patterns and carbon emissions. The recent independent review of the carbon impacts of the second Roads Investment Strategy for 2020-2025 makes clear that as drafted these plans will increase emissions from the Strategic Road Network by 20%[10]. It is unacceptable that the Department for Transport isn't carrying out a clear analysis of the cumulative impact of projects it is funding.

Transport academic, Phil Goodwin has separately highlighted these issues[11] and notes the weakness of saying that road by road, or project by project there is a small increase to carbon emissions. The Department for Transport needs to be planning on the basis of how investments in transport will reduce emissions made by people travelling, both individually and cumulatively.

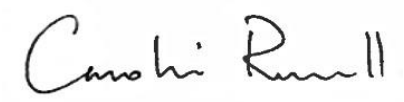
The impacts of transport investment on carbon emissions must be related back to the overall carbon budget. There should be a rapid review of existing infrastructure projects. Those that fail to reduce carbon emissions should be halted or amended so that they can make their contribution needed for the reductions in the carbon budget.

Transport projects need to be planned across all possible modes. Unfortunately, we have lost some of the innovation seen in earlier transport planning work such as the London Assessment Studies, which helped set the scene that led to transformational projects like the Croydon Tram, London Overground and the development of the London Congestion Charge.

Instead, the approach of Development Consent Orders and taking major infrastructure projects out from their local context to be assessed in inquiries is failing to consider how to build coherent and successful transport networks. Investments like the Silvertown Tunnel, which unbelievably hasn't even included plans to provide a crossing for walking and cycling where it is needed, should have no place in a low carbon future.

The future transformative investments we need are in local transport that would be transformative. – In London that would be bridges like the Diamond Jubilee (Cremorne) in Battersea, or Rotherhithe to Canary Wharf bridge, not major new motorways like the Lower Thames Crossing and the Silvertown Road Tunnel.

Yours sincerely,



Caroline Russell
Green Party Member of the London Assembly

[10] http://www.transportforqualityoflife.com/u/files/The%20carbon%20impact%20of%20the%20national%20roads%20programme%20FINAL.pdf

[11] https://www.transportxtra.com/publications/local-transport-today/comment/66363/road-appraisal-makes-carbon-dioxide-uniquely-insignificant--why-and-what-to-do-about-it-

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