



Chartered
Institute of
Environmental
Health

The Mayor's Transport Strategy

Response to draft for consultation on the key policies
and proposals from the Mayor of London

December 2009

The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines, run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

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1. Introduction

- 1.1. The CIEH welcomes this strategy and the opportunity to comment on the draft before publication in 2010. We consider that this is a crucial time for transport in the capital, and that co-ordinated and comprehensive action is essential to ensure that outcomes are maximised.
- 1.2. The strategy admits that there are likely to be capacity problems in all modes for the foreseeable future. Whilst it notes that the Tube dates from the mid-19th century though, the capacity improvements it lists are essentially short to mid-term and we would like to see that there is some consideration of the longer term looking towards the next century. Meantime, it is important to maintain transport at a level that is affordable for all and ensure that it is accessible for all.
- 1.3. This strategy is clearly comprehensive and deals with a large number of issues. Notwithstanding that the CIEH has decided for practical reasons to (in the main) limit our comments to areas which have an impact on climate change and air quality as these are the areas where we feel we can best contribute.
- 1.4. This response deals with the sections of the strategy in order and is not intended to be read in isolation as there is cross-over and linkage in many areas.

2. The consultation headlines

Mayor's vision

Chapter 1 – Introduction

- 2.1. The CIEH notes that this document is out for full public consultation whilst the air quality strategy has only just concluded its consultation with London Assembly (and therefore has yet to commence full public consultation). Given that transport is a major source of air pollutants, and that the two documents should have major links we are concerned as to how the two will link up in final copy when the timescales are not aligned.

Chapter 2 – Mayors Vision

- 2.2. The CIEH supports the goals of the transport strategy but would like to see the contribution transport makes to air quality in addition to climate change recognised. We would like to see mention of the other transport pollutants (as opposed to just CO₂) which should be reduced by a successful strategy in the goals, or a clear link to the air quality strategy.

Challenges and strategic policies

Chapter 4.2 – supporting economic development and population growth

- 2.3. The CIEH would like to see mention that not only will changing travel behaviour make the best available use of road space, that it will benefit air quality as well in paragraph 158.

Chapter 4.3 – enhancing the quality of life for all Londoners

- 2.4. The CIEH is pleased to see that air quality and noise impacts of transport are recognised in the strategy and the mention of the air quality strategy. We would however like to see reference made to the Mayor's health inequalities strategy in part 4.3.6 to ensure the two are read in conjunction.

Chapter 4.6 – Reducing transport's contribution to climate change and improving its resilience

- 2.5. The CIEH supports all efforts by the Mayor to reduce CO₂ emissions and to adapt to climate change. Targets set in this area are challenging and require co-ordinated and comprehensive proposals which the various strategies should help to deliver. Clear and strong leadership will be needed to ensure maximum benefits are achieved and we hope that the Mayor will take this lead.

Chapter 4.7 – supporting the delivery of the London 2012 Olympic and Paralympic Games and its legacy

- 2.6. The CIEH supports the aim that every spectator travels to the 2012 Olympic and Paralympic games using public transport, walking, cycling or temporary park and ride facilities. It will be necessary to ensure that such services are accessible and

available to all but we agree that this poses a unique opportunity to work with Londoners to change the way they travel, and to create a lasting legacy which will benefit all.

Chapter 5.4 – London’s bus network

- 2.7. The CIEH is pleased to see that the bus network is covered by the strategy but would like to see link made to the air quality strategy. For example, there is no detailed consideration of the type of buses used in the Transport Strategy, and with buses and coaches accounting for 30% of all NO_x emissions in London, it is essential that this is dealt with in a co-ordinated and joined up manner.
- 2.8. Please see our comments to the Mayors Draft Air Quality Strategy for more detail in this area.

Chapter 5.5 – Taxis, private hire, coaches and community transport

- 2.9. Again, the CIEH considers that a clearer link needs to be made to air quality in this section, with taxis in London accounting for 35% of PM₁₀. The strategy states that “taxis can play a key role in improving air quality and tackling climate change” but this is not explained, particularly when considered in the context of the contribution that taxis make to PM₁₀.
- 2.10. We note that there is a proposal to “develop low emissions taxis”, but no detail as to how this will be carried out or implemented. The Air Quality strategy focussed on making older and replacement vehicles compliant to Euro 5 as opposed to development of a new taxi, so we would welcome clarity on these aims.

Chapter 5.7 – The Blue Ribbon network

- 2.11. The CIEH supports the policy of making better use of the blue ribbon network in London and agrees that transport of freight by water can be a less damaging option environmentally (part 5.7.5). We would however like to see the link made to the Mayor’s Air Quality strategy, and that any expansion of the use of the river is done in a way which does not allow air quality to worsen as a result. As air quality strategy itself says “river transportation is an often overlooked source of emissions”.
- 2.12. We consider it is also necessary to ensure that river transportation does not cause a noise nuisance to the substantial numbers of residents who now live alongside the water and this should also be considered to ensure expansion is sensitive to this.

Chapter 5.8 – River crossings

- 2.13. The CIEH is supportive of further work to investigate options for road based river crossings in East London as part of a package of transport improvements. It is important that these include opportunities for improved walking and cycling crossings and that all measures form part of a cohesive plan.
- 2.14. Again, we would like to see this considered alongside the air quality strategy as transport is a major contributor to air quality and any new road crossings could be detrimental to air quality in those local areas.

Proposals to encourage more cycling and walking

Chapter 5.12 – The cycling revolution

- 2.15. The CIEH supports all efforts to encourage individuals to cycle more as an alternative to using private vehicles. We are pleased to see the launch of new schemes such as cycle hire, continued support for cycle training and look forward to seeing the development of “biking boroughs” (and in particular details of support which will be provided to boroughs to help them take the lead).
- 2.16. We agree that a sub-regional approach will be one way in which boroughs and TFL can effectively work together to deliver a wider cycling change and look forward to seeing more detail as to how this will work.
- 2.17. We also agree that fears about personal safety are an issue and that road improvements are necessary. These however need to be subject to awareness raising amongst other road users to ensure that their effects are not negated.
- 2.18. We agree with the comments made in 5.12.6 that a revision of the rules concerning pedicabs is needed as both passengers and drivers seem to be exposed to risks to their health and safety. We look forward to seeing how the Mayor intends to take this forward in the final strategy.

Proposals to improve London’s environment

Chapter 5.18 – Improving noise impacts

- 2.19. The CIEH supports efforts to reduce the noise impacts of transport in London and the proposals detailed. The earlier commissioned report by the GLA on the “Effect of noise on physical health in London” might be referenced here, and used to support this section.

Chapter 5.19 – Improving air quality

- 2.20. We would draw attention to our comments provided in our response to the draft Air Quality Strategy and confirm that our opinions remain the same.
- 2.21. We consider that the transport strategy must make the link from smarter choices and sustainable travel behaviour and the effect that these can have on air quality which do not appear to be covered in any detail in this section. We would also like to see eco-driving training being provided not only to GLA/functional bodies but also to residents and businesses in London, alongside a publicity campaign to raise awareness of the benefits of eco-driving.

Proposals to reduce transport’s contribution to climate change and improve its resilience

Chapter 5.20 – Reducing CO2 emissions

- 2.22. We agree that the target of 60% reduction in London’s CO2 by 2025 from the 1990 base will be challenging and that the three themes will be useful in this regard.

- 2.23. A cohesive and joined up strategy will be essential to ensure that the benefits of all actions are maximised and consider that all efforts to reduce CO2 must also ensure there is no negative effect on air quality. We would like to see linkages from this section to the air quality strategy strengthened.
- 2.24. We think it would also be useful for functional bodies to review the operation of vehicle movements in-house and other fleet operators to reduce as far as possible unnecessary vehicle journeys. For example, the use of split body vehicles for refuse collections or rescheduling them outside peak times. It will however, be necessary to ensure that there are not undesirable impacts, such as increased noise through night time operations.

Chapter 5.21 – Adapting to climate change

- 2.25. The CIEH supports the proposals around adapting to climate change and welcomes the consideration of this in planning and commissioning new transport infrastructures.

Proposals to manage the demand for travel

- 2.26. The CIEH supports the smarter travel initiatives and efforts to reduce the impacts of freight transport within the capital. With freight currently comprising 17% of the road traffic in London (and predicted to increase) innovative short and long term measures will be essential to ensure that air quality and transport within London does not suffer.
- 2.27. We would like to see a continuation and further support for measures to reduce car journeys associated with schools, and welcome the school cycle parking initiative. We look forward to seeing its work in the remaining 78% of schools which have yet to benefit.
- 2.28. We consider targeted education campaigns could be helpful around managing travel demand, and the public and business needs to be engaged in the agenda to change behaviour around car usage, benefiting not only air quality, but congestion, carbon reduction and other areas as well.
- 2.29. We have commented on the Western Extension to the Congestion Charge zone in our response to the Air Quality Strategy and draw your attention to our response there.
- 2.30. We consider that it is essential that any proposals to charge for road use does not disproportionately affect those who can least afford it, and this will need careful thought alongside real and valid alternatives to car use in the charged locations. We look forward to seeing how this work progresses.

3. Conclusion

The CIEH welcomes this draft strategy and hopes that the comments made will help formulate the final version. We look forward to working with the Mayor in future to help deliver the objectives contained within it.