

'Have your say on changes to the Ultra Low Emission Zone and Low Emission Zone' – TfL Consultation 30/11/17 to 28/2/18

Response by Lewisham Cyclists (the London Cycling Campaign Local Group for London Borough of Lewisham). www.lewishamcyclists.org.uk lewishamcyclists@gmail.com

We are strongly supportive of these proposals on the implementation and expansion of the Ultra Low Emission Zone (ULEZ) in London.

However we would like the proposals to go further with the funds raised going directly to encourage alternative non-polluting transport modes and generally reduce vehicle use across London. We are aware that the Mayor's Transport Strategy includes commitments to dramatically increase the walking/cycling/public transport modal share across London and we welcome those commitments. Our additional comments on the ULEZ proposals are as follows:

We believe that the ULEZ should ultimately be extended to the whole of London, and this should be allowed for in the current plans: the centre's air has the highest concentration of pollutants but illegal levels of pollution occur all over London and everyone deserves protection. We are also concerned that the exclusion of the South and North Circular roads, which are major sources of pollution, mean that Londoners living and working around those roads may be actually adversely impacted by the proposals as they stand.

It is not enough to tackle tailpipe emissions. To radically improve air quality the Mayor should incentivise "modal shift" to walking and cycling: the Mayor must make walking and cycling safe and attractive enough to become the norm (particularly for local journeys), as well as improve public transport and access to car-sharing schemes (as an alternative to car ownership). Mass modal shift is vital to reduce motor traffic and thus help clean up London's air.

Further, we note that Oslo has pledged to reduce motor traffic reduction by 20% by 2019, and phase out private car use in its city centre altogether. Large areas of Copenhagen are car-free, and Paris has begun to make areas of the city car free (albeit only at certain times). London, which is of course a much bigger city than those cited can learn from these examples and itself introduce car free zones across the city. Plans to make Oxford Street motor traffic free are a good, but modest, start.

The Mayor should incentivise modal shift for deliveries and services: we also note that there is a significant opportunity to assist businesses to switch to using cycles (including electrically-assisted cargo/freight cycles) to deliver goods and services within London (especially the centre): the Mayor must incentivise modal shift of this kind too, and highlight the joint pilot initiative of the city of Hamburg and UPS as an example of how this may be done.

The Mayor should also use the Healthy Streets programmes to reduce pollution hotspots in town centres and high streets. We urge that maximum impetus is given to this objective for its own sake but also because it would help clean up the air in high streets and town centres in every borough, where localised air pollution can be very high.

The Mayor should not pursue policies that increase motor traffic, pollution and congestion: the Mayor must avoid policies that would heighten pollution and thus undermine efforts to clean up London's air, through the increased motor traffic and congestion that they would cause. This includes not going ahead with new river crossings (such as the proposed new Silvertown Tunnel) unless for purposes of providing new walking, cycling and public transport links.

The Mayor should join up policies on pollution, climate change, transport, public health and quality of life under a unifying strategic framework: to drive down London's carbon emissions, reduce congestion, improve public health and create better places for people to live, work and play in.

Tim Collingridge (Lewisham Cyclists Secretary) 16/2/18