

Written evidence submitted by Living Streets (EVP0104)

Introduction

1. We are Living Streets, the UK charity for everyday walking. We want a nation where walking is the natural choice for local everyday journeys, free from congested roads and pollution, reducing the risk of preventable illnesses and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone. Our ambition is to get people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking.

2. We have 33,666 active supporters and 60 local groups.

Summary

3. While the UK has made progress in cutting emissions – which reduced by 43% between 1990 and 2018¹ – the Committee on Climate Change (CCC) has highlighted the lack of progress in the transport sector². Transport emissions have remained static or even increased, and now make the largest contribution to UK domestic greenhouse gas (GHG) emissions³. In 2018, road transport accounted for 91% of UK domestic transport emissions⁴, a trend which must be halted and reversed to meet legally binding net zero targets.

4. It is vital for Government to move swiftly to reduce demand for carbon intensive transport modes. Accelerating the shift to zero emission vehicles must take place alongside behaviour change towards active and sustainable transport modes. The CCC 6th Carbon Budget assumes that about 9% of car miles can be reduced (e.g. through increased home-working) or shifted to lower-carbon modes (such as walking, cycling and public transport) by 2035, increasing to 17% by 2050⁵. This change in policy is an opportunity to achieve multiple government objectives including levelling up regional disparities, tackling mental and physical illness and a vital tool in the economic recovery from the pandemic. A default “electric first” policy for all taxpayer funded vehicles would be the foundation stone for such a policy.

5. We support road pricing as a means of promoting behaviour change towards, and raising revenue for, active and sustainable transport modes. Road pricing is likely to be more acceptable if people know how the money is spent and see benefits from it – provision must be made for local authorities to gain revenue from miles travelled on local roads. Road pricing should be based on the principle that the polluter pays, reflect cost of space occupied and wear and tear of public roads, and be fair to those on lower incomes and / or dependent on private transport.

Accelerating the shift to zero emission vehicles is welcome, but not enough

6. Living Streets welcomes the requirement for all vehicles to have a significant zero emissions capability (e.g. plug-in and full hybrids) from 2030 and be 100% zero emissions from 2035. It will help Government achieve the 78% reduction in UK greenhouse gas emissions by 2035 relative to 1990 recommended by the UK Committee on Climate Change

in their 6th Carbon Budget⁶. However, this is not enough. In *Gear Change*⁷, Government committed to “half of all journeys in towns and cities being cycled or walked by 2030”. It is essential to accelerate modal shift so that that walking and cycling or using public transport is people’s natural first choice for daily activities.

7. The Tyndall Centre⁸ found that even if all new cars were ultra-low emission vehicles (ULEVs) by 2035, a 58% reduction in car mileage between 2016 and 2035 would still be required to be in line with a ‘well below 2°C’ pathway⁹. It has been noted that “manufacturing a medium-sized electric vehicle [EV] with an 84-mile range results in about 15% more emissions than manufacturing an equivalent petrol vehicle. For larger... EVs that travel more than 250 miles per charge, the manufacturing emissions can be as much as 68% higher than an equivalent petrol vehicle¹⁰ [OBJ].”

8. Electrification will not reduce emissions of fine particulate matter from brake, tyre and road surface wear either. These now collectively exceed emissions from diesel and petrol cars¹¹. Friends of the Earth and Transport for Quality of Life¹² concluded that the government should explore policy options which reduce traffic between 20-60%, between now and 2030.

9. In order to achieve a significant reduction in traffic mileage, the alternatives must be made more attractive, for example:

- Improving infrastructure for pedestrians and cyclists as promised by Government through its proposed £2billion package in *Gear Change*
- Making public transport more affordable, accessible and reliable
- Ceasing the cyclical reforms of the planning system and giving more weight to the planning system; master planning is crucial to identifying and providing the infrastructure for sustainable journeys
- Introducing measures to constrain traffic growth, such as road charging, workplace parking levies and reducing parking availability or introducing city centre access restrictions. Restricting parking is an effective way of encouraging a shift away from individual car use – although it works best when active and public transport alternatives are already in place¹³.
- Mandating low carbon transport as the default option for buses and government fleets (e.g. NHS, council services, police etc.) to create a second hand market for EVs and to ensure public money does not “lock in” carbon intensive travel.

EV charging infrastructure must not be at the expense of people walking

10. The roll out of charging infrastructure must not encroach on pedestrian infrastructure. Off-street charging in public and private car parks is our preferred option. Where necessary, on street charging in the carriageway is less likely to cause a trip hazard and will not take space away from people walking. This costs councils more because Traffic Regulation Orders are required to make and enforce changes to a road’s use and design, whereas changes

to pavements do not. Regulations should be changed to enable charging points to be placed in the carriageway under delegated officer powers.

11. The roll-out of EV charging infrastructure must not widen inequalities. The £90 million allocated in the 2020 Spending Review to support the roll out of larger on-street local charging schemes and rapid hubs in England¹⁴ is welcome, but costs vary across England. Some companies provide match funding or install charging infrastructure for free – for instance, in London¹⁵. The Government should identify where gaps in provision exist and fill them in to ensure equal access. The Local Government Association has called for Government to “develop a much clearer role for councils in delivery and [to]... to build skills and capacity for local delivery”¹⁶.

Decarbonising buses

12. Buses are seen as the Cinderella transport mode but they are the fastest way to achieve the government’s stated ambition to level up the country. Social mobility is impossible without physical mobility for disadvantaged communities. Clean, reliable bus services are vital for young people to access school, college, training and work opportunities, for carfree residents to go to work and for older people to retain independence and keep in touch with family and friends.

13. Electrification of public/shared transport should be a government priority as it reduces emissions, is a more efficient use of finite road space and supports walking as part of a longer journey. In September 2019, the Department for Transport announced a £220 million funding package to support bus services in England (outside London). Of this, up to £50 million was allocated for Britain’s first all-electric bus town or city¹⁷. While this is commendable, it highlights the differences in investment (and ability to invest) in new buses across the country. Outside London primary investment comes from the bus operators not the public sector¹⁸.

14. Bucking the national trend, London and Nottingham have both managed to retain and increase bus patronage – and invest in a low-carbon fleet. Transport for London (TfL) plans for 2000 of its 9000 strong bus fleet to be electric by 2025¹⁹ and Nottingham has invested in biogas and reduced emissions across its fleet²⁰. What sets these two cities apart is their degree of control over their bus operations – TfL has the power to set fares and timetables and Nottingham City Council is the principal shareholder in Nottingham City Transport, a former municipal bus company privatised during deregulation. This demonstrates the importance of municipal control (as well as Government grants) to run services residents want, raise income, retain profits and reinvest in cleaner buses.

Road pricing

15. We support road pricing as a means of promoting behaviour change towards, and raising revenue for, active and sustainable transport modes. Road pricing is likely to be more acceptable if people know how the money is spent and see benefits from it – for example, improvements to walking and cycling infrastructure, investment in public transport or subsidised fares. Nevertheless, we accept that if income from Vehicle Excise Duty and Fuel

Duty declines sharply, as predicted, road pricing offers a way to plug the gap in the public finances.

16. Tolls from the strategic road network could be retained by Government, whereas revenue from local journeys could be used locally as happens in London. The fuel duty escalator could also be reintroduced as a ‘green levy’ in the short term (e.g. 5 years, 9 years to 2030 or until petrol and diesel phase out in 2035) and a percentage redistributed as a ring-fenced grant to councils to support active travel, community and public transport, and to help local authorities to get ‘electric ready’. A ring-fenced grant of this nature should address regional disparities in transport spending in order to contribute to the Government’s levelling up agenda.

17. Road pricing should be based on the principle that the polluter pays and on the consumption of public goods (wear and tear of the road network). This would require a formula based on the distance travelled, vehicle weight and the emissions (exhaust and particulate matter from brakes and tyres) produced by vehicles. Road pricing must be fair and be seen to be fair. People who can afford to pay, will pay and are less likely to change their behaviour. People in low-income jobs and zero-hour contracts who depend on their own transport could be disproportionately affected – and are less likely to own or be able to invest in electric vehicles. Charges should be means tested or amended in some way to reflect the needs of people on low incomes and / or no other form of transport. Furthermore, with an estimated 60% of new cars in Europe sold to companies, the second-hand car market is heavily influenced by company car regulations²¹. Company car tax benefits should only be given to zero emission vehicles.

18. The European Federation for Transport and the Environment have called for taxation on vehicle ownership and use²². In other words, road pricing should not replace the existing tax on vehicle ownership. A tax on ownership reflects the environmental cost of the amount of space occupied by growing numbers of cars on public roads. For example, cars are typically parked 96% of the time²³ with many privately owned vehicles stationary in the carriageway (more than a third of households have no off-street parking²⁴ and 35% of households in England own two or more cars/vans)²⁵. A convenient, cost-effective and coherent public transport network – in particular buses – needs space. The biggest factor affecting journey times by bus is congestion²⁶. Therefore, fiscal tools should be used to encourage greater car sharing (e.g. for when a car is needed), to ensure that finite road space in towns and cities is prioritised for sustainable modes of transport.

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Endnotes

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- ¹ Department for Transport (2020). 'Decarbonising Transport: Setting the Challenge'. [Decarbonising Transport: Setting the Challenge \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- ² Committee on Climate Change (2019). 'Reducing UK emissions – 2019 Progress Report to Parliament'. [Reducing UK emissions - 2019 Progress Report to Parliament - Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk)
- ³ Committee on Climate Change *ibid.*
- ⁴ Department for Transport *ibid.*
- ⁵ Committee on Climate Change (2020). '6th Carbon Budget' [Sixth Carbon Budget - Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk)
- ⁶ Committee on Climate Change *ibid.*
- ⁷ [Gear change: a bold vision for cycling and walking \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- ⁸ Tyndall Centre for Climate Research, University of Manchester.
- ⁹ <https://www.transportforqualityoflife.com/u/files/1%20More%20than%20electric%20cars%20briefing.pdf>
- ¹⁰ [The Environmental Impact of Manufacturing EVs - Electric Vehicle Charge Point Quotes \(evcpq.co.uk\)](https://evcpq.co.uk)
- ¹¹ Air Quality Expert Group (2019). 'Non-Exhaust Emissions from Road Traffic'. Report produced for Department for Environment, Food and Rural Affairs; Scottish Government; Welsh Government; and Department of the Environment in Northern Ireland. [1907101151_20190709_Non_Exhaust_Emissions_typeset_Final.pdf \(defra.gov.uk\)](https://defra.gov.uk)
- ¹² <https://www.transportforqualityoflife.com/u/files/1%20More%20than%20electric%20cars%20briefing.pdf>
- ¹³ Department for Transport / NatCen (2021). 'Impact of interventions encouraging a switch from cars to more sustainable modes of transport: A rapid evidence assessment (REA)' [Switching to sustainable transport: a rapid evidence assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- ¹⁴ [Spending Review 2020 documents - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- ¹⁵ See reference to free charging points in the London Borough of Barnet [Electric Vehicle Charge Points.pdf \(modern.gov.co.uk\)](https://modern.gov.co.uk) by joining [Source London | EV charging network](https://modern.gov.co.uk)
- ¹⁶ [Spending Review 2020: On-the-Day Briefing | Local Government Association](https://nao.org.uk)
- ¹⁷ [Improving local bus services in England outside London \(nao.org.uk\)](https://nao.org.uk)
- ¹⁸ See for example First Group's announcement of £70 million in 2016 [FirstGroup announces £70m fleet investment in annual fleet order - CBW \(cbwmagazine.com\)](https://cbwmagazine.com)
- ¹⁹ [TfL reaches milestone as its entire core bus fleet 'meets the strictest emissions standards' - Energy Live News](https://www.energy-live.com)
- ²⁰ Nottingham case study 1 [Improving local bus services in England outside London \(nao.org.uk\)](https://nao.org.uk)
- ²¹ [Company cars are the 'low hanging fruit' in shift to emobility | Transport & Environment](https://transportenvironment.org)
- ²² [T&E position paper on taxation of passenger cars, October 2002 \(transportenvironment.org\)](https://transportenvironment.org)
- ²³ <https://www.reinventingparking.org/2013/02/cars-are-parked-95-of-time-lets-check.html>
- ²⁴ Department of Transport (2020). 'Decarbonising Transport Setting the Challenge'. ²⁴ paragraph 2.6 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/878642/decarbonising-transport-setting-the-challenge.pdf
- ²⁵ National Travel Survey (2020), table NTS9902 [Region and Rural-Urban Classification - GOV.UK \(www.gov.uk\)](https://www.gov.uk)
- ²⁶ Transport Focus (2020). 'Bus Passenger Autumn Survey 2019'. [Bus Passenger Survey – Autumn 2019 report - Transport Focus](https://transportfocus.org.uk)