# City of London Moor Lane Ultra Low Emission Vehicle pilot

### 28 November 2018

<u>https://www.cityoflondon.qov.uk/business/environmental-health/environmental-protection/air-quality/Pages/ulev.aspx</u>

## About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups.

### General comments on this scheme:

The scheme to restrict motor traffic to only "Ultra Low Emission Vehicles" (ULEVs) on the southern end of Moor Lane is opposed.

The small size of trial site is unlikely to yield meaningful results about traffic redistribution and/or evaporation, or the use of ULEVs in the City (that can't be gathered by other means) etc.

On top of that, given the high-end nature of many private hire and private motor vehicles, as well as the trajectory for new taxis and emissions, it is unlikely that even in the short to medium term excluding higher emissions cars on streets in the City will have much impact on motorised traffic levels. Other methods of restricting and reducing motor traffic, such as physical modal filters, are likely to yield far better results than this proposal.

### Specific points on this scheme:

- The current proposal does not cover a significant area or even a street with significant problems.
- ULEVs do not reduce emissions or pollutions to zero such vehicles simply shift emissions from the highway to the point of power generation, and the evidence is that use of braking systems, tyres and other moving motor vehicle systems are a significant source of dangerous particulate pollution even when there are no fuelderived emissions. ULEVs also do not reduce congestion, or increase activity levels in themselves. As such, while schemes such as this could encourage shift from heavilypolluting vehicles to cleaner ones, they are not likely to encourage or enable mode shift to healthier and more sustainable forms of transport, such as walking, cycling and public transport. In other words, a street used heavily by ULEVs will be no better for cycling and little better for walking than a street used heavily by motor vehicles with higher emissions.

- This is particularly likely to be true in the City where private car use is low, and where many private cars are at the higher end of the market, including those used by private hire vehicles. Given this, introducing ULEV-only streets and zones in the City is very unlikely to significantly reduce motor vehicle traffic.
- For these reasons, enabling more sustainable modes, including for deliveries, servicing, construction etc., is more important than cutting out higher emission motor vehicles from individual streets or areas. And providing and enabling genuine alternatives to driving for as many journeys as possible will be increasingly vital to keep the City moving. It is important then to ensure the overall transport strategy does not end up favouring and/or incentivising ULEVs above more sustainable and active forms of travel.
- For the many reasons listed in the above points, a pilot of a full-time, permanent modal filter here, instead of a ULEV section of street, would be of greater use than this proposal.
- Given the physical filtering of Moor Lane at certain hours at present offers a far more useful facility for those cycling (and walking) by restricting all motor traffic, retaining the existing "road closure" in Option 2 is a preferred option. In either case, concerns about signage being "complex and less easy to understand" in Option 2 seem unrealistic, as outside of ULEV pilot operational hours, there will be a physical barrier stopping motor vehicles accessing the space.

### General points about infrastructure schemes:

- LCC requires infrastructure schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which promote cycling meet TfL's "Healthy Streets" checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.

• LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLoS) rating of 70 or above, with all "critical issues" eliminated.