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National Infrastructure Commission
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From:
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Contact: Jenny Bates – [email and telephone number redacted]

15th January 2016 (by arrangement with the NIC)

Thank you for the opportunity to comment in the call for evidence:
<https://www.gov.uk/government/consultations/national-infrastructure-commission-call-for-evidence/national-infrastructure-commission-call-for-evidence>

We wish to make some points in relation to section 3 on London's transport infrastructure.

We include as Annex 1, and refer you to, our submission to the London Assembly Regeneration Committee inquiry into Transport-led regeneration.

1. What are the major economic and social challenges facing London and its commuter hinterland over the next two to three decades?

Economic and social challenges which face London must be considered and dealt with together with environmental challenges, according to the principles of Sustainable Development which underpins planning and of which a definition is set out in the NPPF, and also in the London Plan

<https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-annexes> .

This means that solutions to London's economic, social and environmental challenges must be ones which are win, win, win for all 3 areas – as the government says “We want to achieve our goals of living within environmental limits and a just society, and we will do it by means of a sustainable economy, good governance, and sound science.” <https://www.gov.uk/government/publications/securing-the-future-delivering-uk-sustainable-development-strategy>

Indeed the key challenges facing London are ones which are economic, social and environmental in nature.

Population growth is a key challenge for London in all these 3 respects – including on transport implications. Anticipated population growth should be dealt with sustainably as part of a national strategic strategy, however some inevitable increases in London must be dealt with sustainably from a transport point of view. Population growth will result in potential extra journeys, and so pressure on existing infrastructure and demand for further investment.

Dealt with in the wrong way and this could have negative implications on the economy such as, if traffic was allowed to increase, through worsened congestion. There could also be negative social implications from more traffic including more accidents, worse community severance, and such as health impacts and worse health inequality from the environmental problem of worse air pollution (as the most disadvantaged tend to live near main roads where air pollution is worst worse air pollution exacerbates health inequalities).

However there is an existing problem and challenge of there being too much dirty traffic in London - current and expected worse congestion, and current inequalities including health inequalities are themselves key challenges for London.

Air pollution is an environmental challenge but also an economic and social one. Economically there are costs estimated at up to £20B a year, congestion and air pollution kept London down to 38th place for liveability in a ranking of world cities (<http://www.telegraph.co.uk/expat/expatnews/10648488/Viennas-the-most-liveable-city-but-polluted-London-misses-out.html>), and this would be expected to have impacts on the economy as businesses want an efficient as well as a healthy environment for people to live and work in and to visit. Socially nearly 10,000 Londoners die prematurely a year due to air pollution, with the most vulnerable in society being disproportionately affected – and with the early deaths being just the tip of the iceberg below which there is ill-health.

The NIC will be aware that the UK is failing EU legal limits for the toxic gas Nitrogen Dioxide (NO₂) which were due to be met by 2010, and 2015 at the very latest. It will also be aware that a Supreme Court ruling has meant that the government was required to produce new plans by the end of last year to meet limits now in the shortest time possible, but that these plans have been deemed by those who brought the case to be not adequate (failing as they do to take all possible measures).

The EU Air Quality Directive's requirements are absolute, and that there can be no averaging of improvements and deteriorations across a zone. Not only is there a non-deterioration principle to protect relatively good air under limits, and the requirement that a breach not be caused, but also that air over limits must not be worsened.

It is not adequate to rely for compliance with EU law on whether a scheme would delay compliance for the Zone ie if there would be elsewhere in the zone with worse air, as has been argued by some based on the NN NPS – but following that cannot render the UK in breach of its international obligations such as the EU Ambient Air Quality Directive. This issue was referred to in the McCracken opinion obtained by Clean Air in London: http://cleanair.london/legal/clean-air-in-london-obtains-qc-opinion-on-air-quality-law-including-atheathrow/attachment/cal-322-robert-mccracken-qc-opinion-for-cal_air-quality-directive-and-planning_signed-061015/.

The London Plan requires development to be Air Quality Neutral (as at 7.14c) ie for air pollution not to be worsened. However, given the requirement to meet limits in the shortest time possible AQ Neutral is no longer an adequate criteria at this time. Measures proposed to mitigate the effects of a scheme must be done anyway, but the scheme itself not allowed to add to the problem ie the scheme not pursued. Only then, with all other possible positive measures and avoidance of negative ones, would illegal air pollution be brought within limits in the shortest time possible.

There are particular air pollution challenges with the gap between emissions of NO_x expected due to lab tests not being matched in real world driving emissions. The EU Council of Ministers agreed on 28th October 2015 on standards for EU Real Driving Emissions (RDE). The agreement was reached in order to address the discrepancy in emissions between laboratory tests and NO_x emissions found in real world driving. However the new standards would allow new types of Euro 6 diesel cars to emit more than double the Euro 6 NO_x emissions limit from 2017 to 2020, and 50% more after 2020, thereby de facto increasing the standard of Euro 6 from 80mg/km to 120 mg/km (http://europa.eu/rapid/press-release_IP-15-5945_en.htm). There is also the challenge of the VW and wider scandal to be taken into account.

The need to address the causes of climate change are also a huge challenge for London's infrastructure – on transport (and on which measures to tackle air pollution largely overlap with those to tackle climate), and also in buildings and housing (particularly in retrofitting existing stock, and in new build), and on energy supply infrastructure.

Also the impacts of climate change are another environmental challenge which will lead to huge social and economic challenges too – for instance heatwaves and the need to cool the tube, drought and our water supplies, more intense rainfall and the need to slow water's progress into drains are all huge challenges for London's infrastructure. The Mayor and London Assembly have done considerable work on this.

2. What are the strategic options for future investment in large-scale transport infrastructure improvements in London - on road, rail and underground - including, but not limited to Crossrail 2?

The only strategic options are those which deliver on sustainable development in London ie those which help not hinder our ability to live within our environmental limits, and to build a just society ie options which are win, win, win for the economy, society and the environment.

As well as ensuring what vehicles are on our roads are clean, traffic levels must be cut.

No schemes which would add to traffic can be pursued, and only schemes which give people alternatives and help them out of vehicles can be pursued – and this is all the more so the more population is expected to increase.

Road space can and must be restricted and can be re-allocated to help deliver a step change in cycling and walking infrastructure to maximise the potential for these modes, and for public transport to address identified need for longer journeys.

- **How should they be prioritised, taking account of their response to London's strategic transport challenges, including their impact on capacity, reliability, journey times and connectivity to jobs?**

The absolute priority is to progress only what will help deliver on environmental issues such as air pollution and climate change, as well as social issues including inequality, at the same time as developing our economy.

The first priority must be to plan to reduce the need for people to have to travel at all unnecessarily – by providing key amenities and work opportunities within easy walking and cycling distance of homes as much as possible. This is particularly important for any regeneration areas and where population or jobs are due to increase. This approach will help reduce pressure on existing infrastructure, and in turn the demand for further investment.

Facilities for safe and easy walking and cycling must be prioritised to maximise the potential for these modes, which are considerable – ahead of pursuing any identified need for new public transport to adequately enable longer journeys.

There is no place for adding to traffic levels – indeed all road users are helped by cutting traffic levels and less traffic helps congestion, resilience and journey times. Vehicle users are in fact helped by less traffic as this frees up existing roadspace for existing and some future new essential vehicle trips.

In East London a package of non-road measures including new non-road river crossings must be developed– the current road-building plans would add to traffic and so to congestion in the wider area (even if queuing at the existing Blackwall tunnel was reduced there would be worse congestion overall and at other places), and the plans would worsen air pollution.

Further infrastructure must not be allowed at City Airport – this is currently seeking a taxiway and new aircraft stands. City airport is a blight on East London with the aircraft noise, air pollution impacts, and the Public Safety Zone (PSZ) blights large areas around the runway itself. There would be multiple benefits from closing the airport (now that Crossrail will allow quick access to Heathrow) and freeing up the land for much needed housing and work and amenity uses

<http://www.neweconomics.org/blog/entry/why-its-time-to-close-london-city-airport>

- **What might their potential impact be on employment, productivity and housing supply in London and the southeast?**

3. What opportunities are there to increase the benefits and reduce the costs of the proposed Crossrail 2 scheme?

Crossrail 2 (any more than Crossrail before it) must not be allowed to develop at the cost of other small scale local transport improvements.

Also, if these mega projects are being pursued, it is essential that the benefits of the investment are maximised by investing in complementary transport measures to feed people into and out of the mega scheme eg walking and cycling connections, and also other public transport, so that the benefit reach out to as wide an area as possible.

4. What are the options for the funding, financing and delivery of large-scale transport infrastructure improvements in London, including Crossrail 2?

London-wide road user charging or pay-as-you-go driving must be seriously looked at for London –the Congestion Charge Zone in central London has been very successful in keeping traffic out, and a scheme is needed to cover the whole of London in order to cut traffic and congestion (and help with air pollution), and this can be a revenue earner to be used to give alternatives to driving.

- **What is an appropriate local and regional contribution - given the potential distribution of benefits to business, residents, transport users and the wider economy - and how could this be achieved?**
- **What innovative funding mechanisms could be considered to support delivery of key schemes?**

5. How have major metropolitan areas in other countries responded to similar challenges and priorities? Are there any lessons to be learned and applied in London?

There are examples of how removing road space from vehicles has been done and been successful. For instance Seoul removed a key highway from its centre:

(<http://www.theguardian.com/environment/2006/nov/01/society.travelsenvironmentalimpact>)

Cities are now increasingly restricting road-space and traffic to tackle air pollution:

<http://www.theguardian.com/cities/2015/dec/09/car-free-city-oslo-helsinki-copenhagen>

(Oslo [revealed plans](#) to ban all private vehicles from the centre by 2019)

ANNEX 1 – Friends of the Earth submission to the London Assembly Regeneration Committee inquiry into Transport-led regeneration, August 2015 (also in the collated submissions for the inquiry <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/transport-led-regeneration>)

To:
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From:
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31st August 2015

Re Inquiry: Transport-led regeneration

Thank you for the opportunity to comment on this important issue.
We trust that, given that it was until the end of the month that responses to the inquiry were welcomed (see email chain below), you will accept our comments dated 31st August.

We wish to make the following brief comments, with reference to the Thames Gateway road bridge as a case study of ill-conceived transport-led regeneration.

We understand that Campaign for Better Transport will have made a submission referencing a report of theirs.

We wish to follow that up stating that it is our view that it is regeneration led by sustainable transport modes which is clearly the way to develop London sustainably in a way which helps address inequalities and helps us meet our environmental targets, and that road-building-led regeneration is not only counter-productive but also iniquitous.

Focusing on regeneration models which help improving accessibility through reducing the need for people to have to travel, by providing as much as possible, key amenities and work opportunities within easy walking and cycling distances not only enhances quality of life and health, but also takes the pressure off public transport.

Investing in public transport for any identified need to facilitate longer journeys helps all road users. It helps those without access to a vehicle and reliant on public transport, and also helps take the pressure off the road network – the aim should be that the road network should be left for essential vehicle journeys (both existing and potential new ones as a result of population growth).

By contrast investing in road-based regeneration tends to mean fewer people travel by sustainable modes (as people are attracted by driving), which is not only contrary to policy and also deprives people of the health benefits of active travel.

Non-road based regeneration makes much better use of space, enabling higher densities and more land available for housing and work opportunities, or public/open space – as providing space for roads and parking space is wasteful. The main businesses which tend to be attracted to an area when road-based regeneration is pursued would be vehicle-dependent development such as warehousing and distribution which tends to be low-density and low-employment usage.

Indeed, the evidence for road-based regeneration is very weak and potentially counter-productive.

The Greenwich Peninsula site should have been a prime development site, if its position next to the 4-lane

Blackwall road Tunnel was truly beneficial – yet the site lay dormant for a long time until British Gas paid English Partnerships £20m (as I recall) to secure a Jubilee Line Extension station on the site.

Further the proposed Thames Gateway road bridge (TGB) proposed between Greenwich and Newham, on proper scrutiny at a Public Inquiry in 2005-6, showed that the regeneration claims made for the scheme did not stand up.

Further, given the requirement in planning for sustainable development, whereby economic development, the building of a just society and the requirement to live within our environmental limits are required to be delivered together (ie through win, win, win solutions) it is clear that transport investment must be such that helps reduce inequalities (including health inequalities), and help deliver on environmental targets such as on climate change and air pollution – and that the pursuit of economic goals does not add to the problems of meeting either social and environmental goals.

Whereas non-road based regeneration helps deliver sustainable development, road-based regeneration adds to traffic levels (through generated traffic – whether overall or at certain times of day), and so worsens congestion in the area (though the pattern of existing congestion may change), and adds to air pollution.

More traffic and worse congestion and more air pollution blights and is clearly de-generation for local communities. Air pollution is an issue which hits the most vulnerable, and the most deprived the hardest (as they tend to live near the main roads where air pollution is worst) – and so adding to air pollution adds to health inequalities.

But worse traffic, congestion and air pollution is also bad for business and for regeneration – adding to congestion is clearly counter-productive, and air pollution makes an area unattractive for people to live or work or visit.

We wish to draw your attention to a few key links:

Case study: the Thames Gateway road bridge:

This press release and linked briefing refers to various issues raised by the planned TGB – on traffic generation and congestion, on air pollution, and on fewer people walking and cycling and using public transport if the scheme went ahead, and on regeneration.

Friends of the Earth's 2007 briefing from after the end of the TGB inquiry but before it was known the Inspector had recommended rejecting it

http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008

Background briefing at the end of the Public Inquiry:

http://www.foe.co.uk/sites/default/files/downloads/thames_gateway_bridge_07.pdf

On traffic and congestion:

- Induced traffic: Professor Phil Goodwin

<http://stopcityairportmasterplan.tumblr.com/post/19513243412/induced-traffic-again-and-again-and-again>

- Transport expert John Elliott's slides showing when Blackwall tunnel was doubled from 2 to 4 lanes, traffic more than doubled within a year at peak time

<http://stopcityairportmasterplan.tumblr.com/post/20012814230/presentation-slides-arguing-the-case-against-the>

- John Elliott also has made clear that with more roadspace, more traffic would mean overall worse congestion in the area (though the pattern of congestion may change).

If congestion was relieved eg at the Blackwall tunnel/Silvertown Link approach then it would just mean that traffic had got on to another area quicker and making congestion worse there.

- The TGB Inspector's report stated that crossing was "likely to cause increased congestion"

http://www.foe.co.uk/resource/press_releases/thames_gateway_road_bridge_06112008

- A Hyder report which was buried by Greenwich warned of "The likely outcome would be the exhaustion of the Silvertown Link capacity within a relatively short timeframe with exacerbated congestion on the local road network." and "This could only be mitigated by a new high quality public transport link, such as a DLR extension."
- <http://853blog.com/2014/05/06/buried-greenwich-council-report-criticises-silvertown-tunnel/>

Road building and air pollution:

- For example the TGB would have resulted in worse air pollution (see above)
- Kings college London did a study of widening the A206 (which was a key link to make a route all the way from the TGB to the M25 dual)

<http://www.sciencedirect.com/science/article/pii/S0048969714010900>

This showed:

- Local air quality deteriorated after completion of a road widening scheme in south London.
- The EU PM10 limit value (LV) was breached during construction.
- NO2 LV was breached after scheme due to increased cars, taxis and LGVs

Despite this evidence, TfL have continued to pursue new road-building and argued that it would help regeneration.

What they have not done is look at a proper package of non-road alternatives, which would include multiple non-road investments as well as road-pricing etc as required.