

Committee(s)	Dated:
Port Health and Environmental Services	5 March 2019
Subject: City of London Transport Strategy, Cleaner and quieter outcome – consultation response	Public
Report of: Director of the Built Environment	For Information
Report author: Samantha Tharme – Department of Built Environment	

Summary

The City of London Transport Strategy will set the 25-year framework for future investment in, and management of, the Square Mile's streets and for improvements to transport connections.

One of the Strategy's outcomes is: The Square Mile's air and streets are cleaner and quieter. This outcome includes proposals relating to air quality, electric vehicles, vehicle noise and street cleansing.

This report provides an update on the 'Cleaner and quieter' outcome following consultation on the draft Transport Strategy.

The majority of respondents to the consultation supported the draft proposals and no significant changes are required. Feedback received during the consultation is summarised in the report, with further details provided in Appendix 2.

The Transport Strategy is currently being finalised following consultation and is expected to be submitted for adoption by the Planning & Transportation Committee, the Policy & Resources Committee and the Court of Common Council in the Spring.

Recommendation(s)

Members are asked to:

- Note the report

Main Report

Background

1. Over the last 12 months the City of London Corporation has developed and consulted on its first ever long-term Transport Strategy. The Transport Strategy is currently being finalised following consultation and is expected to be adopted in the Spring.

2. The Strategy sets out the City Corporation's approach to investing in and managing the City's streets over the next 25-years and aspirations for improved transport connections.
3. Delivering the Transport Strategy will help facilitate the forecast growth of the City and accommodate the increased numbers of people travelling to and around the Square Mile. It will improve the experience of spending time on the City's streets with the aim of ensuring the Square Mile remains a healthy, attractive and easy place to live, work and visit.
4. The development of the Transport Strategy has been informed by extensive engagement with the public and organisations with an interest in transport in the Square Mile.
5. The first phase of engagement was held in February and March 2018, this included almost 2,000 responses to the City Streets survey. One of the key themes raised during this first phase of engagement was the need to urgently improve air quality in the Square Mile.
6. A second phase of engagement, in June and July 2018, consulted on the proposed vision, aims and outcomes for this Strategy. Over 500 people and organisations responded to this consultation. 87% of respondents supported the Cleaner and quieter outcome.
7. Consultation on the draft Transport Strategy ran from 10 November 2018 to 13 January 2019. The consultation was widely promoted, including through Ward newsletters, social media, the Transport Strategy and Active City Network mailing lists, flyers and the City of London website home page.
8. The main consultation activities were:
 - **Consultation website:** A bespoke consultation website allowed people and organisations to indicate their level of support for and comment on all proposals. To maximise the volume of feedback received and cater for all interest levels the website allowed users to tailor the level of detail and respond to by choosing one of the following options:
 - Ten 'key proposals' that are likely to be of most interest and will result in some of the most significant changes
 - Proposals grouped by topic or topics, e.g. transport mode
 - All proposals, organised by outcome
 - **Stakeholder briefings:** 47 representatives from stakeholder organisations attended briefing sessions at the Guildhall Art Gallery on 30 November.
 - **Drop-in sessions:** Eight public drop-in sessions were held over the consultation period in the City Corporation's libraries and in Guildhall reception.
9. Almost 2,900 individual responses and 6,900 comments were received through the consultation website, with a further 70 submissions by email. Over 60 organisations also responded to the consultation.

Consultation results for ‘Cleaner and quieter’ proposals

10. Levels of support for the proposals to deliver the Cleaner and quieter outcome are summarised in the table below, with further details provided in Appendix 1. These scores were generated through the consultation website, with respondents indicating their level support on a scale of 1 (oppose) to 5 (support).

Proposal	Score
Support and champion a central London Zero Emission Zone (Key proposal)	4.1
Install additional electric vehicle charging infrastructure	4.1
Request an accelerated roll out of zero emission capable buses	4.6
Support small businesses to accelerate the transition to zero emission capable vehicles	4.3
Make the City of London’s own vehicle fleet zero emissions	4.6
Reduce the level of noise from motor vehicles	4.3
Reduce noise from streetworks	4.3
Encourage innovation in air quality improvements and noise reduction	4.4
Ensure street cleansing regimes support the provision of a world-class public realm	4.4

11. The consultation website also allowed individuals and organisations to leave comments on proposals. Comments were also received through written submissions. Comments for each proposal are summarised below, along with a summary response and details of proposed changes. Further details are provided in Appendix 2 and updated proposals (with tracked changes) are provided in Appendix 3.

Proposal 29: Support and champion a central London Zero Emission Zone

12. There was a high level of support for this proposal with many people asking for it to go further than the two local Zero Emission Zones (ZEZ) proposed for the City Cluster and Barbican and Golden Lane. Concerns expressed were predominantly around the need to manage implementation timescales for any ZEZ with a realistic approach to access issues for residents and restrictions that reflect the availability of zero emission capable vehicles, particularly for freight.

13. Response: No changes are proposed as a result of consultation comments. The need to consider phasing for vehicle class/type and possible exemptions for certain users is reflected in the proposal and will be considered during the development of local ZEZs. Residents, businesses, the freight industry and other street users will be engaged as part of this process.

Proposal 30: Install additional electric vehicle charging infrastructure

14. This proposal received a high level of support with people commenting that it is essential to support a transition to electric vehicles. The inclusion of hub sites was welcomed by some freight operators and taxis, although two larger freight operators noted the need for charging facilities at their own depots, as they would need to charge overnight not whilst delivering. Many commented on the need to ensure charge points are not installed on pavements.
15. Response: No substantive changes are proposed in response to the consultation. However, the proposal has been updated to include a commitment to produce an Electric Vehicle Charging Action Plan in 2019. This will identify how many additional charge points are required up to 2022 in the Square Mile and where they should be installed. This action plan will include consideration of the charging needs of residents and disabled drivers. Locations will be identified through engagement with the TfL EV Infrastructure Taskforce, which includes EV industry representatives, as well as wider consultation.

Proposal 31: Request an accelerated roll out of zero emission capable buses

16. This proposal was well supported. Many people also commented on the need to tackle buses as one of the 'worst' polluters when responding to proposal 29. TfL have responded that by the mid-2020 all buses serving the Square Mile will be hybrid or zero emission.
17. Response: The proposal has been updated to reflect the TfL timetable and include a longer-term target for all buses to be zero emission (electric or hydrogen) by 2030.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

18. This proposal received relatively few suggestions for changes, with the main request being that support should also be offered for switching to non-motor vehicle, e.g. cargo bikes. TfL offered to support and assist with promotion of the existing financial incentives and scrappage schemes available.
19. Response: The proposal has been updated to include supporting businesses to switch to non-motor vehicles as well as zero emission capable vehicles. The proposal has also been updated to reflect changes in legislation on battery weight and vehicles weight limits for drivers' licences that were passed after the draft Strategy was produced.

Proposal 33: Make the City of London's own vehicle fleet zero emissions

20. This proposal was generally supported, with a couple of comments noting that given this is fully within the Corporation's control an earlier target should be set. Others suggested that the Corporation fleet should include more cargo bikes, and that an overall reduction in vehicles should be part of the policy.
21. Response: No changes are proposed. The size of the City Corporation fleet has already been reduced and corporate policy includes the need to reduce the number of fleet vehicles. At present the issue of retrofits/alternatives for some

HGVs still affects the corporation fleet, but we are actively working to find appropriate vehicles, such as the waste collection electric vehicles.

Proposal 34: Reduce the level of noise from motor vehicles

22. This was supported although some concerns were expressed about safety and electric vehicles.

23. Response: No changes are proposed. The need to understand potential safety impacts of quieter electric vehicles is already included in Proposal 20: Apply the safe system approach and the principles of road danger reduction to deliver Vision Zero

Proposal 35: Reduce noise from streetworks

24. This proposal was supported with no notable comments.

25. Response: No changes are proposed.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

26. This proposal was well supported, with some comments noting the need to reduce motor vehicles overall and not just see technical solutions as the fix to poor air quality.

27. Response: No changes are proposed.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

28. This was supported with a few comments highlighting the need for better cleansing regimes and an equal number noting that good standards of cleansing already exist.

29. Response: No changes to the proposals are recommended.

Corporate and strategic implications

30. The Transport Strategy is aligned with the draft Air Quality Strategy and supports the delivery of the following outcomes from the Corporate Plan:

- Outcome 2 'People enjoy good health and wellbeing'
- Outcome 11 'We have clean air, land and water and a thriving and sustainable natural environment'

Financial implications

31. A costed Delivery Plan outlining the projects that will be delivered or initiated in the first three years of the Strategy will be published alongside the adopted Transport Strategy. The Delivery Plan will include a funding strategy and be updated on an annual basis.

Health implications

32. Delivering the Transport Strategy will help bring air quality on the Square Mile within legal and healthy limits.

Conclusion

33. Overall, responses to the Transport Strategy, including proposals to deliver the Cleaner and quieter outcome have been positive and no substantive changes are proposed.

Appendices

Appendix 1: Summary results from consultation website

Appendix 2: Comment summaries and responses

Appendix 3: Changes to Transport Strategy proposals 29 to 37

Background papers

Draft Transport Strategy <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/draft-transport-strategy.pdf>

Phase 1 Engagement report <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/transport-strategy-phase-1-engagement-report.pdf>

Phase 2 Engagement report <https://www.cityoflondon.gov.uk/services/transport-and-streets/Documents/transport-strategy-phase-two-engagement-report.pdf>

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Appendix 1: Summary results from consultation website

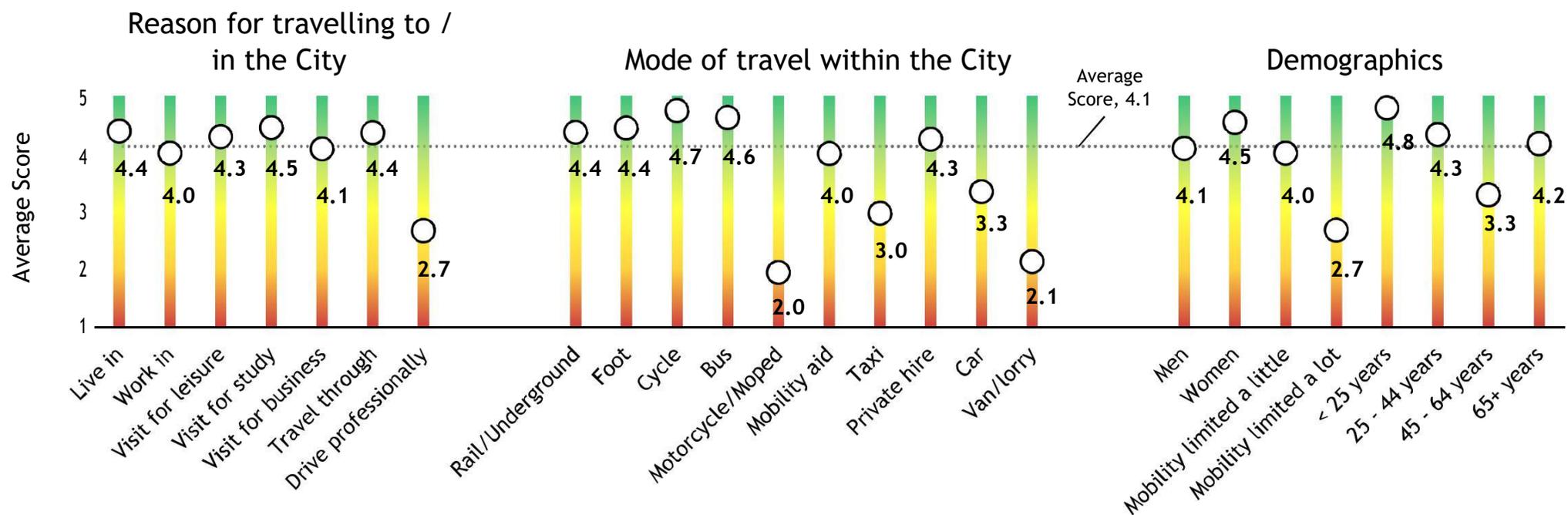
Proposal 29 Support and champion a central London Zero Emission Zone

2016 Responses

4.1 Average score

Oppose

Support



Proposal 30

Install additional electric vehicle charging infrastructure

198 Responses

4.1 Average score

Oppose

Support

7%

6%

17%

16%

55%

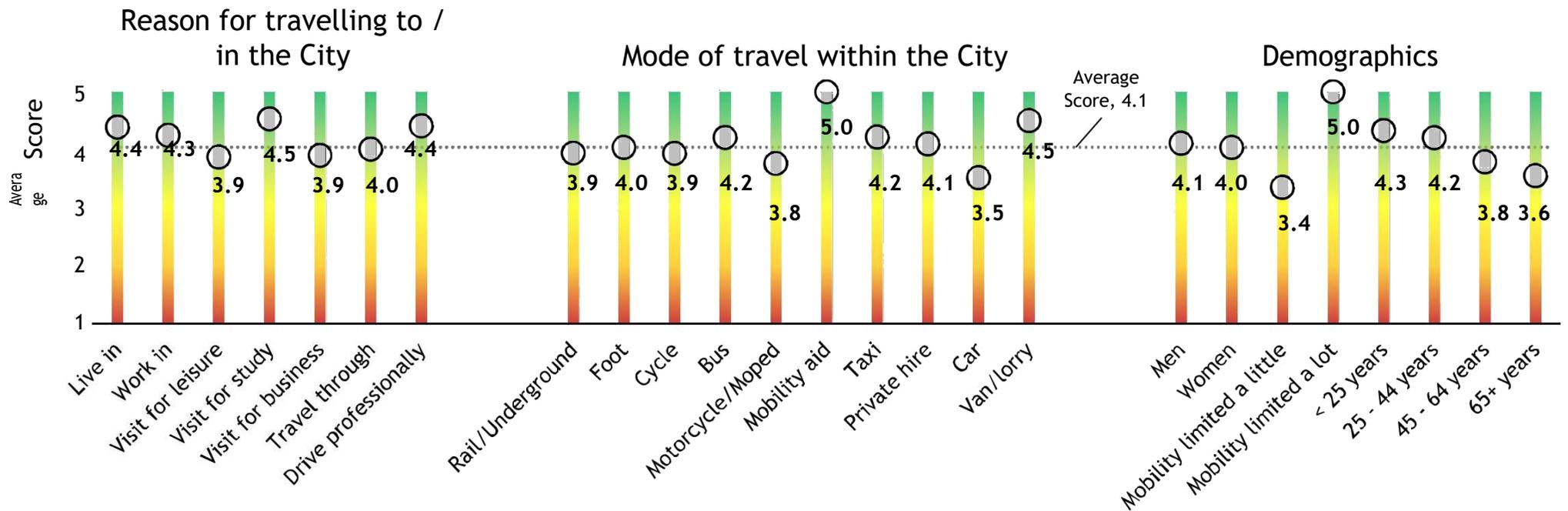
1

2

3

4

5



Proposal 31 Request an accelerated roll out of zero emission capable buses

208 Responses

4.6 Average score

Oppose

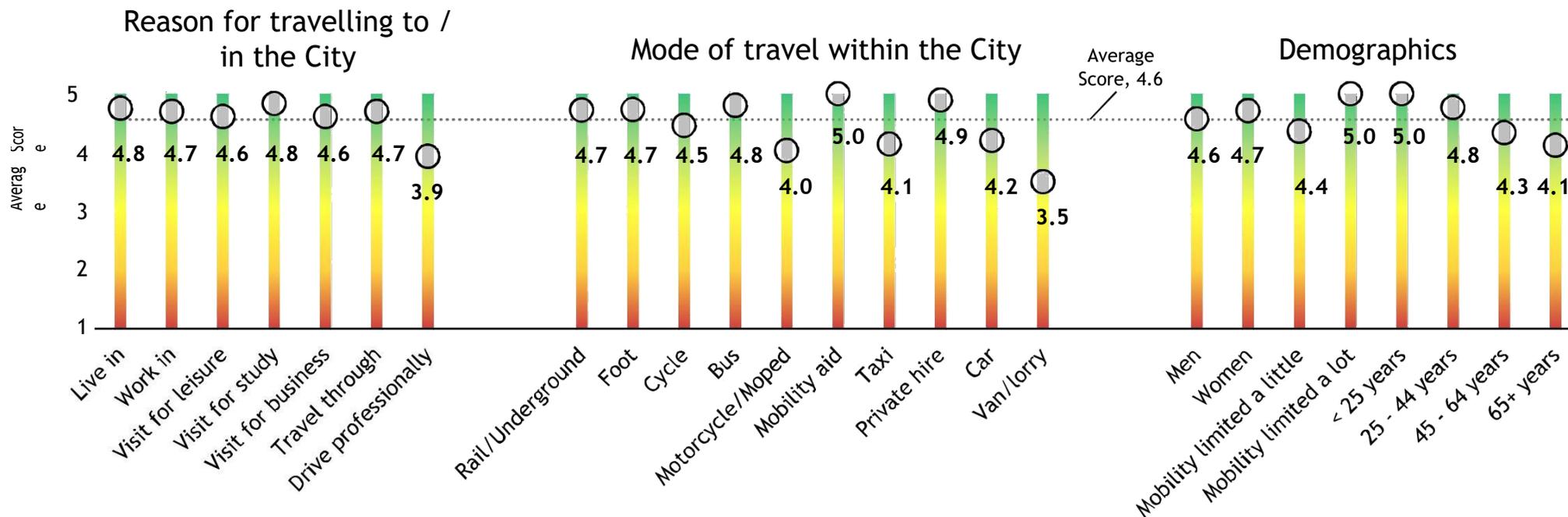
Support

3% 2% 7% 9%

79%

1 2 3 4

5



Proposal 32 Support small businesses to accelerate the transition to zero emission capable vehicles

182 Responses

4.3 Average score

Oppose

Support



Proposal 33 Make the City of London's own vehicle fleet zero emissions

194 Responses

4.6 Average score

Oppose

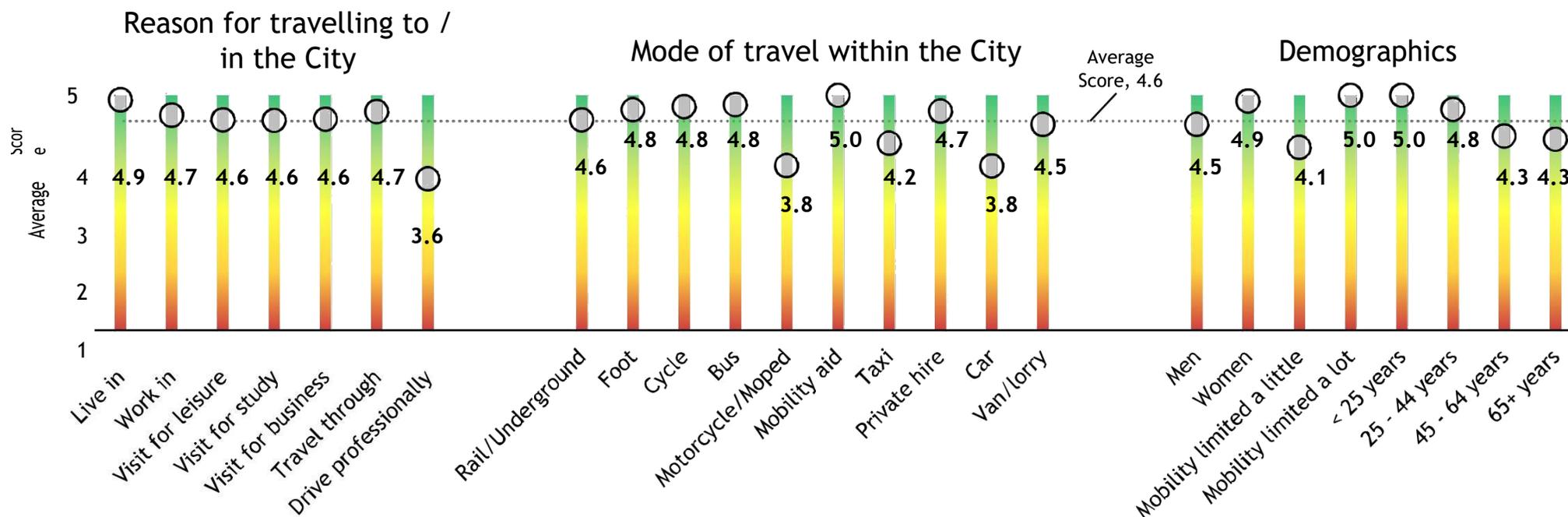
Support

4% 2% 5% 11%

78%

1 2 3 4

5



Proposal 34

Reduce the level of noise from motor vehicles

196 Responses

4.3 Average score

Oppose

Support



Proposal 35

Reduce noise from streetworks

171 Responses

4.3 Average score

Oppose

Support

4%

1%

15%

23%

57%

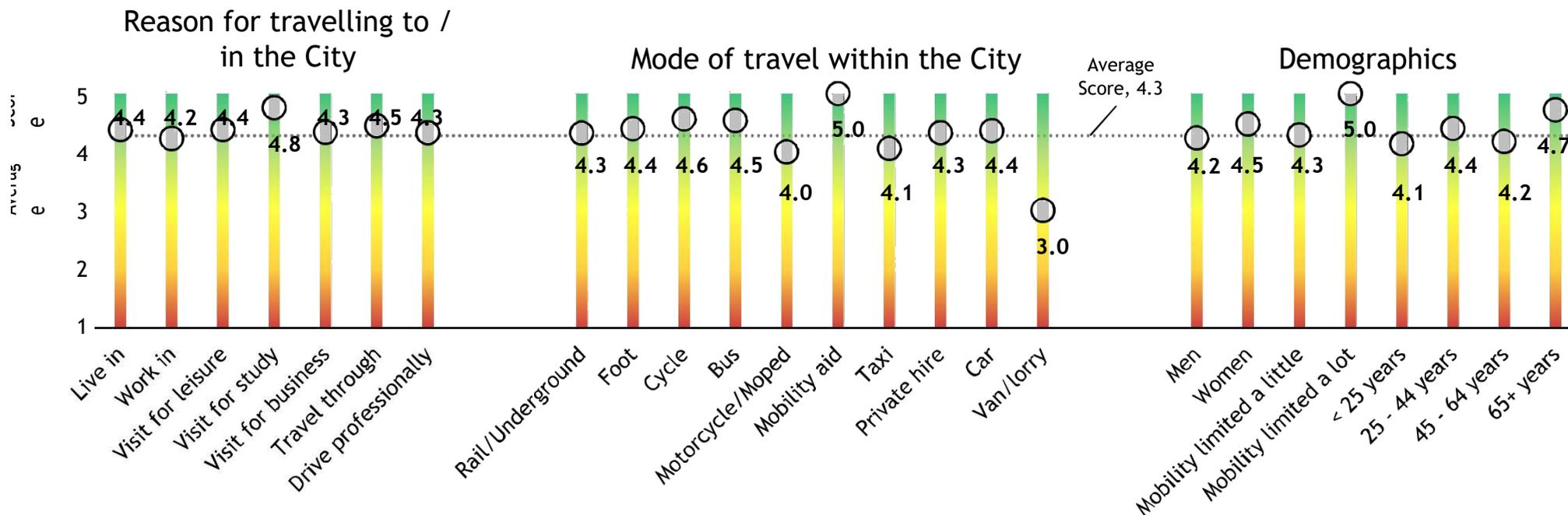
1

2

3

4

5



Proposal 36

Encourage innovation in air quality improvements and noise reduction

185 Responses

4.4 Average score

Oppose

Support

5% 1% 12% 12%

1 2 3 4

70%

5



Proposal 37 Ensure street cleansing regimes support the provision of a world-class public realm

171 Responses

4.4 Average score

Oppose

Support

5% 2%

10%

15%

68%

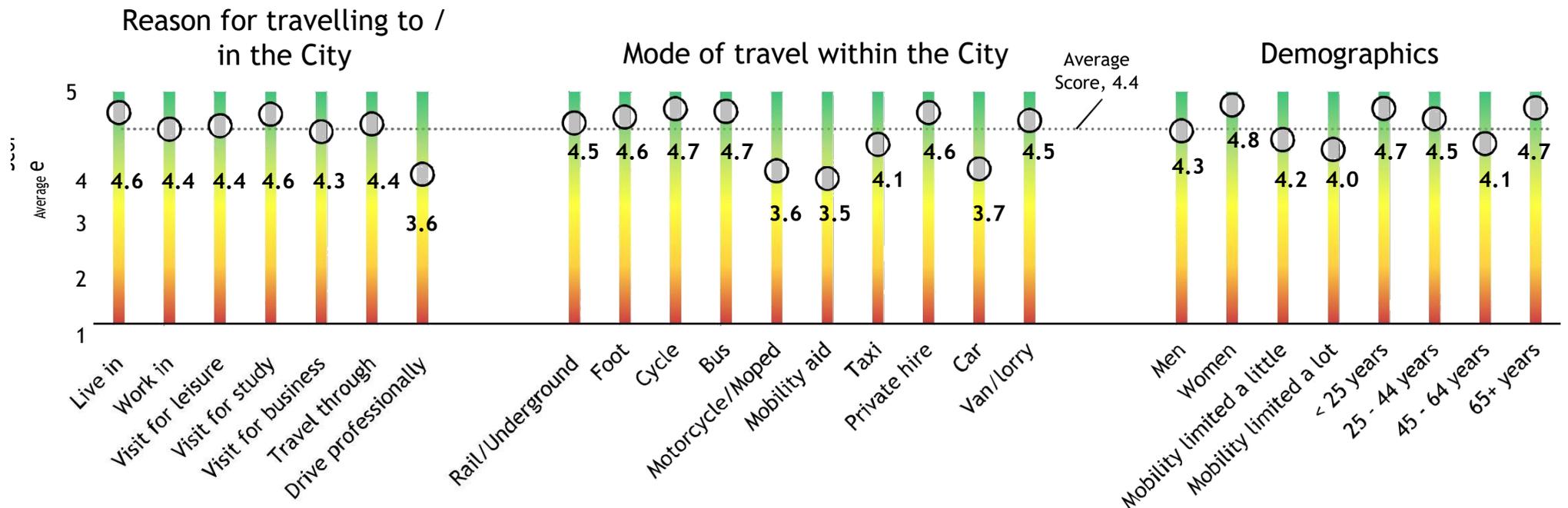
1

2

3

4

5



Appendix 2: Comment summaries and responses

Proposal 29: Support and champion a central London Zero Emission Zone (Key proposal)

General expressions of support

275 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Railfuture
- Stop Killing Cyclists
- Brake
- Bike Taxi Ltd
- Living Streets
- Port of Tilbury London Ltd
- Systra
- SALIX
- Barbican Association – Residents
- City Property Association
- City Property Association NextGen
- Transport for London
- CIC
- Lancefield St residents
- Roadpeace
- Flit Technologies Limited
- A1X Limited
- TheTin ltd
- AWT Investments Limited
- Skc
- The Heron, 5 Moor Lane, Residents Committee
- Wheels for Wellbeing
- Ramblers Inner London Area
- Quarter One
- Flit Technologies Limited

The following organisations expressed general support but also made suggestions or highlighted concerns which are addressed in the table below.

- **City of London Access Group (COLAG)** raised the issue that there is a very limited range of electric vehicles which meet the requirements for some disabled drivers and that there are currently no hybrid or electric vehicles available for people requiring wheelchair accessible vehicles.
- **St Paul's Cathedral School** would welcome inclusion of additional zero emission streets or zone around St Paul's Cathedral.
- **The London Taxi Driver Association (LTDA)** support the proposal but would like to see a temporary exemption for taxis while the trade transitions to zero emission capable taxis.
- **Stop Killing Cyclists, Brake and Bike Taxi Ltd**, noted that the introduction of Zero Emission Zones needs to be complemented by overall traffic reductions as zero emission capable vehicles still contribute to particulate matter produced by tyre and brake wear as well as congestion and road danger.
- **London Tourist Coach Operators Association (LTCOA)** expressed concern that zero emission coaches are still in their infancy with much of the technology either untested or not yet tested to an extent that proves its robustness. LTCOA would welcome further discussion to explore the potential need for a compromise that minimises the impact on the coach industry while still supporting overall emission reductions.
- **Freight Transport Association, Royal Mail and Federation of Small Businesses** all expressed interest in the detail and a willingness to work with City of London Corporation to help deliver a workable ZEZ.

General expressions of opposition.

56 people expressed their opposition for this proposal (in full or in part) and made no specific suggestions or requests for changes.

5 people thought that the motivation proposals was for raising 'tax' through fines for non-compliant vehicles rather than genuinely for air quality improvements

The following organisations expressed general opposition but also made suggestions or highlighted concerns which are addressed in the table below.

- **Motorcycle Action Group (MAG)** oppose the introduction of ZEZ on the grounds of confusion and undemonstrated cost/benefit of introducing higher emission standards than those required by the wider 2019 ULEZ. They are also concerned that this is changing the targets, as they feel people will upgrade to meet ULEZ 2019 requirements and that to go further in a short space of time is unreasonable. MAG also suggested the transition to zero emission capable vehicles should be market led and that fines/upgrades of vehicles would have a greater impact on lower income groups.
- **Alliance of British Drivers (ABD)** contest the need for a ZEZ on the grounds that air pollution is not as damaging as the evidence suggests and that it is unnecessarily costly. ABD argued that diesel buses and HGVs are the biggest contributors to poor air quality and there is no effective alternative to them.
- **La Fromagerie** noted that no ZEC refrigerator vans a currently available.
- **Smithfield Market Tenants' Association** noted that no ZEC HGVs will be available within the next 5years.

Specific concerns and suggestions for changes

Comment group/theme	Comments summary, including organisational responses with organisations names in bold	Response/commentary
<p>Support the proposal but request that it to go further (106 comments)</p>	<p>48 people suggested the local ZEZs should cover a wider area or that vehicles should be banned completely. St Paul's Cathedral School and a number of individual respondents asked for the area around St Paul's to be a ZEZ, highlighting the health impacts of air pollution on children.</p> <p>29 people thought the proposal for local ZEZ should be implemented earlier than 2022, citing poor air quality and health impacts as the reason for faster action.</p> <p>Tyre and brake wear 22 people as well as Stop Killing Cyclists, Brake and Bike Taxi Ltd highlighted the need to reduce particulate matter from tyre and brake wear alongside exhaust emissions.</p> <p>Reduce non-vehicle emissions. 16 individuals and the following organisations expressed concern that we need to also be addressing emissions from fossil fuels at power stations, where these would still be the source of the power supply.</p> <p>A number of people raised the point of needing to deal with emissions associated with uses other than transport, including emissions from non-road mobile machinery (NRMM) used by the construction industry.</p>	<p>The timescale proposed for 2022 implementation is considered appropriate given the need for engagement, challenges of implementation, vehicle availability and the need to consider access requirements.</p> <p>The proposal to introduce two local ZEZs, where covering areas of the Square Mile with the greatest concentrations of people working and living, is anticipated to deliver benefits from reduced vehicle pollution across the Square Mile, as the routes to ZEZs will have a greater proportion of ZEC vehicles. As we develop these zones, we will consider the possibility of other areas or extensions.</p> <p>We recognise the need to reduce particulate matter from tyre and brake wear. This will be in part addressed by proposals to proactively reduce the number of motor vehicles in the Square Mile. Proposals to encourage safe speeds and behaviours as part of Vision Zero will result in slower speeds and less aggressive braking should also reduce tyre/brake wear.</p> <p>Electric vehicles are for more efficient in fuel use/CO2 output than combustion engines. The wider need to reduce the use of fossil fuels is set out in the City of London Responsible Business Strategy and the City Corporation has agreed to a renewable energy policy for its own direct use. Measures to reduce emissions from NRMM are set out in the City of London Air Quality Strategy.</p>

Potential exemptions and ZEC vehicle availability
(95 comments)

Exemptions for residents and freight

31 people, mostly residents, and the **Barbican Association**, raised the need for exemptions for residents who may not be able to switch to fully electric vehicles by 2022 and still require vehicles for essential journeys. Respondents noted that residents only use vehicles infrequently and do not make a significant contribution to emissions. Residents also expressed concern about taxis access, particularly for disabled residents, and access restrictions on deliveries and servicing, such as plumbers and electricians.

Exemptions for motorcycles and mopeds

40 people suggested that motorcycles and mopeds should be exempt from any restrictions as they are lower emission than other vehicles.

Exemptions for taxis

3 people, the RMT and the LTDA suggested that taxis should be exempt from restrictions as they need to access all areas, are fully accessible and that the taxi trade is already transitioning to ZEC taxis. Some respondents also suggested that those drivers who had invested in ZEC taxis should be given some priority within ZEZs such as dedicated ranks

3 comments expressed an alternative view, suggesting that taxis should not be exempt for ZEZ restrictions, as older vehicles are particularly bad on vehicle emissions.

Vehicle availability

18 people and range of organisations raised concerns about the availability of zero emission capable vehicles. The **LTCOA** noted that zero emission coaches are still in development. **Freight Transport Association** , **Freight Traffic Control 2050** , **Smithfield Market Tenants'**

We recognise the need to take account of the needs of residents and the availability of ZEC vehicles when developing and implementing ZEZs. The need to consider phasing for vehicle class/type and possible exemptions for certain users is reflected in the current drafting of this proposal and will be considered during the development of local ZEZs. Residents, businesses, the freight industry and other street users will be engaged as part of this process.

	<p>Association and Thames Tideway and La Fromagerie expressed concern that there is still a very limited amount of choice for HGV and LGVs that will meet the requirements. SMMT and the Federation of Small Businesses suggested that introduction of ZEZ should be in line with commercial availability of vehicles. Royal Mail note that they would welcome early engagement on proposals so that service needs can be met effectively and avoid unintended consequences of additional vehicles being required.</p>	
<p>Financial impacts on businesses and individuals (58 comments)</p>	<p>The need for subsidies or price equality 29 people suggested that further subsidy is required to enable a shift to EVs, or that implementation of any further restrictions should be delayed until there is price equality for EVs.</p> <p>People on low incomes (27 comments) 27 people and MAG raised concerns that the need to upgrade vehicles or pay a fine for vehicles not meeting new requirements will unfairly impact on people on low incomes.</p> <p>Others commented that this proposal effectively allows preferential treatment for those who could afford to pay. Some people thought this should therefore mean a complete ban on vehicles not meeting the requirements rather than fines which allow people to 'pay to pollute'; others thought it should be managed by complete bans of all vehicles, not permitting EVs either.</p> <p>Let market lead; allow more time for transition to EVs 2 people and MAG suggested that the transition to zero emission capable vehicles should be market led. A number of other respondents suggested that the implementation of ZEZ restrictions should be delayed due to the costs and availability of replacement vehicles. Motorcycle Action Group and the ABD do not support a ZEZ, London wide or</p>	<p>Grants and financial incentives are available through the Office of Low Emission Vehicles and TfL. The market for small goods vehicles, taxis and private cars is becoming established and for some vehicle types purchase cost will soon be equal to equivalent petrol/diesel vehicles. (expected to be reached by 2020). The operating costs of electric vehicles are notably lower than those of petrol/diesel at present.</p> <p>Comments referring to the low-income groups were mostly relating to residents and will be addressed during the development of the ZEZ, for example through 'sunset' periods that provide time limited exemptions to residents.</p> <p>The mechanisms to manage access mean that it is likely to be necessary to impose fines on offending vehicles. Consideration of what level this should be at to reduce infringements to a minimum will be part of the full feasibility study prior to implementation.</p> <p>The Square Mile, as well as many other parts of London, is still in breach of air quality targets that should have been met by 2005 for PM10 and 2010 for NO2 (EU regulations). The market is not delivering new vehicles at a rate deemed necessary from a health perspective, recognised by UK, EU governments and World Health Organisation.</p>

	<p>local zones, particularly by 2022. Their view is that this should be allowed to happen with the market, and not accelerated. They do not see a valid case in cost/benefit terms of the cost to motorists against the health benefits.</p>	
<p>EV charging infrastructure (34 comments)</p>	<p>34 people stressed the need to provide EV charging infrastructure to support the introduction of Zero Emission Zones.</p>	<p>This is addressed in <i>Proposal 30, Install additional electric vehicle charging infrastructure.</i></p>
<p>Proposals should target worst polluters (23 comments)</p>	<p>23 people commented that diesel buses, taxis and HGVs are the worst polluters and that the proposal should be concentrating on these, rather than a blanket approach for all vehicles.</p>	<p>Reductions in emissions from all types of vehicle will be required to meet air quality targets. TfL have set out a timetable for the transition to ultra-low and zero emission buses and taxis, which is being delivered through contract and licencing requirements. Currently there is a lack of alternative vehicles for HGVs but the Transport Strategy includes proposals to reduce the number of motorised freight vehicles in the Square Mile.</p>
<p>Relationship with central London ULEZ 2019 and neighbour boroughs. (5 comments)</p>	<p>A small number of people and MAG questioned the need from restrictions that go beyond those being introduced as part of the central London ULEZ in April 2019.</p> <p>Brewery Logistics Group, Freight Traffic Control 2050, John Lewis Partnership and SMMT highlighted the need for a consistent approach between the City and neighbouring boroughs, or across London, when implementing any local ZEZ restrictions. TfL recommended that the City of London refers to forthcoming guidance when preparing its future proposals.</p>	<p>Modelling has shown that the air quality on our busiest streets will still be in breach of the UK and WHO health-based limits after the introduction of the ULEZ in April 2019.</p> <p>The risk of confusion and need for consistency is recognised and addressed in the proposal. We will work closely with neighbouring boroughs, London Councils and TfL to ensure a consistent approach.</p>
<p>Will redistribute pollution elsewhere (5 comments)</p>	<p>5 people thought that vehicles avoiding a ZEZ would increase pollution elsewhere, with no net benefit.</p>	<p>Given the scale of the local ZEZs proposed we do not think that there will be a redistribution of traffic.</p>

Proposal 30: Install additional electric vehicle charging infrastructure.

24 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Smithfield Market Tenants' Association
- Gett.
- Freight Traffic Control 2050
- Bike Taxi Ltd
- Living Streets
- London Living Streets
- SALIX
- City of London Access Group
- Sustrans
- Flit Technologies Limited
- The Tin Ltd
- The Heron, 5 Moor Lane, Residents Committee
- Ramblers Inner London Area
- Transport for London
- SMMT

General expressions of support.

UPS, Freight Transport Association and Confederation of Passenger Transport support the proposal particularly with reference to hub sites and depots (rather than on-street) given the operational needs of delivery companies.

SMMT support provision and provide detailed comments which will help inform the Action Plan for delivery of new charge points.

TfL supports the proposal and notes its target for 300 rapid charging points will be delivered by the end of 2020 asking local authorities to identify 20 sites each. Additionally, dedicated taxi rapid charging points are required in the Congestion Charge Zone to encourage electric taxi uptake. **TfL** wish to discuss including the City of London's proposals in the EV Taskforce's charter of commitments.

LTDA support this proposal but expressed their disappointment at the rate of progress so far, London wide and within the City.

16 people expressed support and stressed the need to keep any charge points off footways, protecting space for walking and especially maintaining fully accessible footways. This point was also supported by **Bike Taxi Ltd, London Living Streets, Living Streets, London Cycling Campaign, QuarterOne, Roadpeace** and **Sustrans** made similar comments when commenting on proposal 17. 2 people commented that alternative systems for charging such as wireless or induction charging should soon be available.

16 people commented on the need to cut total motor vehicles in total and not just replace existing numbers with EVs, which is addressed in proposal 11.

The following organisations expressed support and raised some concerns which are addressed in the table below.

- **Barbican Association - Residents** comment on the ability of the background power network infrastructure being sufficient to cope with installation of sufficient EV charge points.
- **UPS** raised a similar point on the funding of the background power infrastructure and questioned who should pay for the upgrades required.
- **City of London Access Group** support and would like to see dedicated provision for disabled drivers.

There were no comments expressing opposition to this proposal from individuals or organisations.

Specific concerns and suggestions for changes.

Comment group/theme	Comments summary, including organisational responses with organisations names in bold	Response/commentary
Prioritisation of different users (8 comments)	A number of comments were received from individuals and organisations emphasising the need for prioritisation for particular user groups. These included the City of London Access Group with respect to the needs of disabled (blue badge) holders; TfL with respect to priority points for taxis. UPS and Freight Transport Association with respect to freight, this included the need to provide at depots as well as hub sites.	The proposal has been updated to include an Action Plan to be completed by the end of 2019 which will include consideration of all user groups.
Comment on non-exhaust emissions (3 comments)	3 people commented that EV charge points could still be using power from fossil fuels and that emissions would therefore be generated at source	EVs still provide an immediate improvement in local air quality and are more efficient in their use of fossil fuels where that is the source of power. The City Corporation is taking steps to increase our own use of renewable power supplies through its Renewable Electricity Policy and Sourcing Strategy.
Network Power infrastructure provision	Barbican Association - Residents questioned the ability of the background power network infrastructure being sufficient to cope with installation of sufficient EV charge points. UPS raised a similar point on the funding of the background power infrastructure and questioned who should pay for the upgrades required.	Working with TfL and utilising the EV taskforce we will address these matters as we assess the next stage of charge point installations. Work in the industry on a wider scale is looking at how to address infrastructure provision and we will look to best practice and encourage innovation.

Proposal 31: Request an accelerated roll out of zero emission capable buses

14 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Alliance of British Drivers
- City of London Access Group
- Bike Taxi Ltd
- SALIX

Additional comments were made on the viability of zero emission capable buses and the need to promote advanced technology such as wireless charging. Two people thought we should use financial support to speed up the change with buses, and one felt we should allow TfL to determine priorities across London.

Transport for London noted that by the middle of 2020 all buses serving the Square Mile will be hybrid or zero emission and that these latest ultra-low emission buses will deliver up to a 95% reduction in NOx emissions from buses, making a significant improvement to air quality. The proposal will be amended to reflect this timetable and include a target for all buses to be zero emission (electric or hydrogen) by 2030.

There were no comments opposing this proposal.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

3 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- **Alliance of British Drivers**
- **City of London Access Group**
- **RMT London Taxi Branch**
- **TfL**

4 people made comments on the availability of zero emission vehicles, which was also raised for Proposal 29 and our response is outlined above.

6 people and **Bike Taxi Ltd** expressed support with the concern that it would be unfair for there to be a subsidy for electric vans and none for bikes/cargo bikes; 5 additional people thought that we should ensure electric bikes are included. The proposal will be updated to include supporting businesses to switch to non-motor vehicles as well as zero emission capable vehicles

Freight Transport Association support the proposal in principle with the exception of preferential pricing for vehicles in this category.

Only 1 person expressed opposition for this proposal.

Proposal 33: Make the City of London's own vehicle fleet zero emissions

12 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Alliance of British Drivers
- City of London Access Group
- Bike Taxi Ltd.
- IAM
- TfL

Freight Transport Association support this proposal, with additional point that the market of available vehicles will be better understood by CoL. They also noted that this may lead to higher upfront costs for contractors.

Expressions of support included comments that cargo-bike/cycles and electric bikes/scooters should be part of the City's fleet of vehicles. That there should be a net reduction in City vehicle fleet as well as a switch to zero/low emission.

A couple of people commented that given this is within City Corporation control it should have an earlier target – the City Corporation policy on fleet procurement requires ZEC vehicles to be considered first when replacement or retrofit of a vehicle is required. This policy also includes a 'no-replacement' requirement as first principle in decision making, with the aim of delivering a net reduction in the City Corporation's vehicle fleet. A few comments also noted the lack of alternative options for HGVs, which the City Corporation is keen to address and will continue to trial HGVs where appropriate such as the all-electric refuse trucks.

One person expressed opposition because they felt this proposal would be a waste of financial resource.

Proposal 34: Reduce the level of noise from motor vehicles

General expression of support

20 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Bike Taxi Ltd
- SMMT
- TfL

8 people expressed concern that electric vehicles add a safety risk if people can't hear them and the **City of London Access Group** noted need to maintain siren noise for blind and visually impaired people. This issue is recognised and addressed in Proposal 20, which sets out our intention to work with industry and access groups to understand and address safety implications arising from the use of quieter vehicles.

Freight Transport Association expressed support whilst asking that any 'no-idling' enforcement campaigns/regulations recognise that some vehicles have operational needs that require them to keep engines running while stationary.

General expression of opposition

4 people expressed opposition to this on the grounds that silent electric vehicles would be dangerous (addressed above) and that implementing the proposals is a waste of resources. The **ABD** question whether a problem that needs resolving.

Proposal 35: Reduce noise from streetworks

11 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- Barbican Association – Residents
- City of London Access Group
- Bike Taxi Ltd
- Transport for London

Supportive comments included noting that getting works done quickly effectively reduced the length of any noise impact. A few comments noted that the details of the proposal should already be in place.

One comment that any further controls were unnecessary in busy city centre. No other opposing comments were received.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

12 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- City of London Access Group
- Bike Taxi Ltd
- Freight Transport Association
- Ramblers Inner London Area
- The Aldgate Partnership
- The Tin ltd
- The Heron, 5 Moor Lane, Residents Committee

Sustrans expressed support with the caveat that technological developments should only be supported if they include measures to reduce motor traffic, which is part of Proposal 11. **Flit Technologies Limited** support the proposal and recommended use of apps to allow customers for deliveries or taxis to specifically select ZEC vehicles. **SALIX** support this proposal but wish to see specific proposals with targets.

2 people commented that more greenery/green space should be utilised improve air quality and 2 suggested that powered two wheelers are already part of the solution

General expressions of opposition.

3 people expressed opposition to the proposal but made no specific suggestions for changes.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

15 people and the organisations listed below expressed their support for this proposal (in full or in part) and made no specific suggestions for changes.

- City of London Access Group
- Bike Taxi Ltd
- Living Streets
- Transport for London
- The Heron, 5 Moor Lane, Residents Committee
- The Tin Ltd
- Sustrans
- Flit Technologies Limited
- The Aldgate Partnership
- Ramblers Inner London Area

Specific comments included that we should require businesses to be responsible to meet the costs of managing packaging/litter and recycling, and that the reduction in cigarette litter was needed. A couple of comments were made that streets should be included, and this has been made more explicit in the proposal.

Two people were concerned that a smoking ban should not be part of the proposal – we do not propose to introduce a smoking ban in public areas as part of this proposal but do seek better behaviour on reducing litter from smoking.

Only 2 people expressed opposition for this proposal on the basis that they consider the Square Mile to be clean enough already. A number of other respondents also highlighted that standards for street cleansing are already high.

Appendix 3: Changes to Transport Strategy proposals 29 to 37

The Square Mile's air and streets are cleaner and quieter

By 2044, transport related local air pollution and carbon emissions will have been cut to virtually zero and streets will be quieter more relaxing places. Together with wider action to reduce emissions from buildings and development, this will mean that the City enjoys some of the cleanest urban air in the world. There will be fewer motor vehicles and those remaining will be powered by electricity or other zero emission technologies. Emerging automation technology will reduce speeds and avoid aggressive acceleration and braking, leading to less tyre and brake wear. New approaches to noise management will mean that street works cause less disturbance.

A recent study commissioned for the Greater London Authority identified that up to 9,500 premature deaths a year were attributable to air pollution. Exposure to high concentrations of Nitrogen Dioxide (NO₂) can irritate the airways of the lungs, increasing the symptoms of those suffering from lung diseases. Fine particles can be carried deep into the lungs where they can cause inflammation and a worsening of heart and lung diseases.

Air quality in the Square Mile does not currently meet the safe limits set by the European Union or World Health Organisation (WHO) for NO₂. Levels of exposure to particle matter (PM₁₀ and PM_{2.5}) are within the UK/EU limit value, however they exceed more stringent WHO standards and the WHO recognises that there is no safe limit for these types of pollutants.

Road transport is responsible for 26% of NO_x emissions, 48% of PM₁₀ and 60% of PM_{2.5}, in the Square Mile. Current air quality monitoring records limit breaches for NO₂ on our busiest streets. In some locations recorded concentrations are twice the safe limit value. Projections show that NO₂ levels will still exceed safe limits on many of our busiest streets after the central London Ultra-Low Emission Zone's (ULEZ) restrictions on the most polluting vehicles come into effect. Brake and tyre wear mean that motor vehicles will also continue to be a significant source of particulate matter even once the majority of vehicles are zero emission capable.

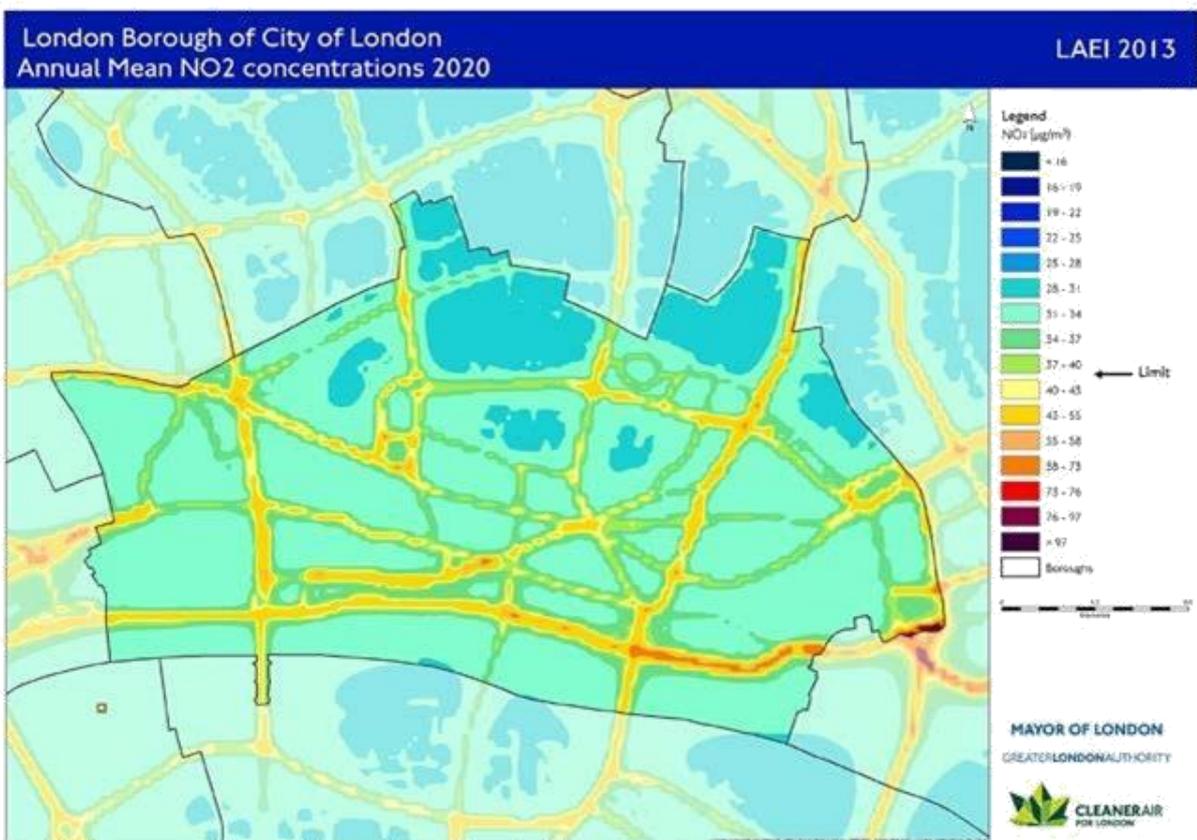


Figure 10: City of London Annual mean NO₂ concentrations 2020 (LAEI 2013)

In 2018, 7% of the Square Mile's CO₂ emissions are produced by motor vehicles. The carbon emissions from electric vehicles are dependent on the source of electricity. However, electric vehicles are far more efficient in fuel use/CO₂ output than combustion engines. An EU study based on expected performance in 2020 found that an electric car using electricity generated solely by an oil-fired power station would use only two-thirds of the energy of a petrol car travelling the same distance.

The direct health impacts of noise pollution include sleep disturbance, stress, anxiety, high blood pressure, poor mental health and school performance, and cognitive impairment in children. Risk of cardiovascular disease increases significantly when noise levels exceed 60 decibels, as they often do on urban streets. Noise can also discourage people from walking, cycling and spending time on streets. 41% of respondents to a recent survey on people's experience and perceptions of noise in the Square Mile cited noise from traffic as a negative factor. Traffic noise was the most significant negative noise or sound identified, followed by noise from construction/building works, which was identified by 12% as an issue.

Proposal 29: Support and champion a central London Zero Emission Zone

We will support and champion the introduction of a Zero Emission Zone (ZEZ) covering central London within the next Mayoral term

We will seek a phased introduction of ZEZ restrictions with the aim of ensuring that 90% of motor vehicles entering the Square Mile are zero emission capable by 2030. This is likely to be achieved through a combination of access restrictions and charging for non-zero emission capable vehicles.

If a clear commitment to introduce a central London ZEZ is not set out in the next Mayor's election manifesto, or commitments are insufficiently ambitious, we will explore the feasibility of implementing a City-wide ZEZ, working with London Councils and boroughs neighbouring the City to ensure a coordinated approach.

Local Zero Emission Zones

While the Central London ZEZ is being developed, we will introduce local ZEZs covering the Barbican and Golden Lane estates and the City Cluster by 2022. Proposals will be developed in consultation with residents and businesses and will reflect the availability of zero emission capable vehicles, while seeking to accelerate their uptake. We will coordinate proposals with TfL, London Councils and London's boroughs to ensure alignment with other existing and planned zero emissions areas and streets.

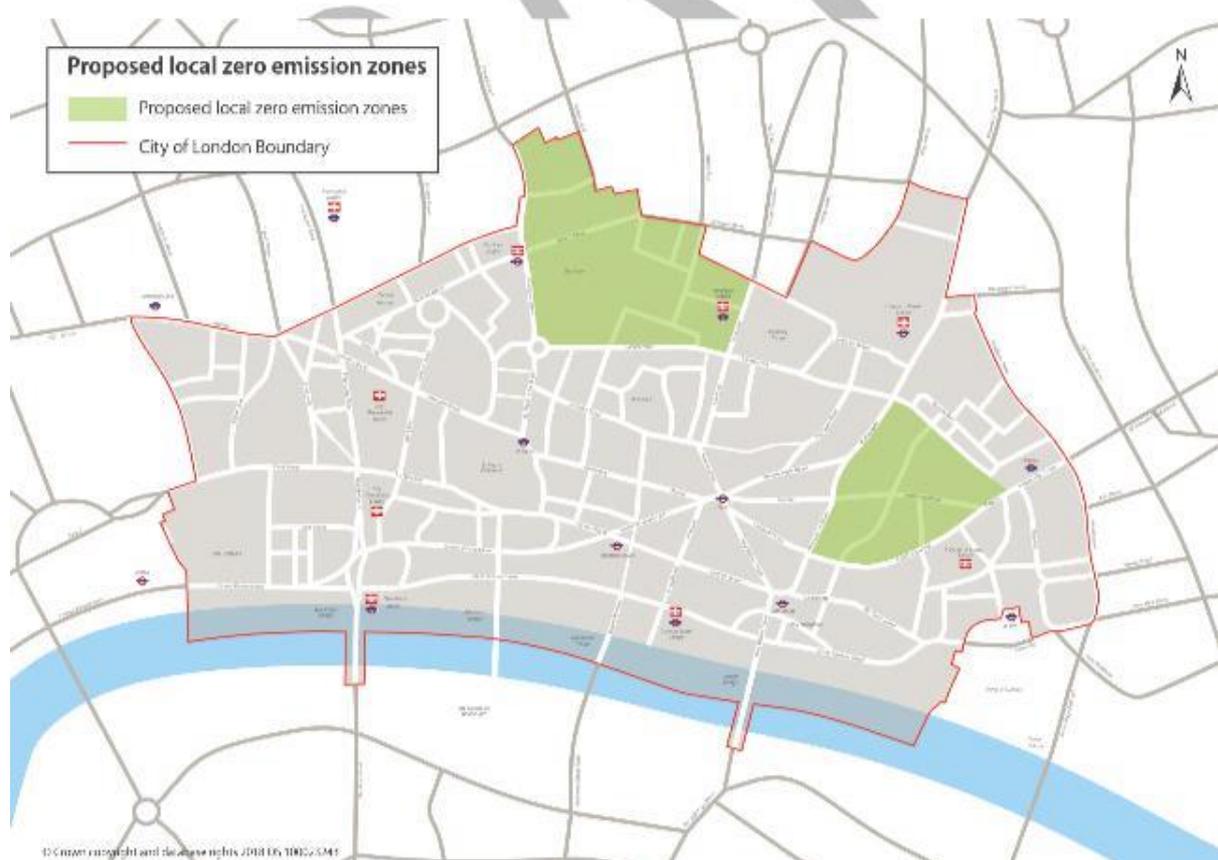


Figure 11: Proposed Local Zero Emission Zones (larger map available on the City of London Transport Strategy webpage)

Proposal 30: Install additional electric vehicle charging infrastructure

We will install additional publicly accessible electric vehicle (EV) rapid charge points ~~by 2025~~ to support the transition to zero emission capable vehicles. An EV Charging Action Plan will be produced published by December 2019. This which will identify how many charge points, including charging hubs, are required up to 2022, as well as longer-term forecasts. In developing the Action Plan we will consider the charging needs of:

- residents
- Blue Badge holders
- taxis
- freight and servicing
- electric two wheelers, motor cycles and mopeds
- electric bikes

~~, including exploring the potential for a charging hub with priority access for commercial vehicles. We will assess the need for additional charge points for taxis and investigate the charging infrastructure required to encourage a transition to electric powered two wheelers.~~

Locations will be identified through engagement with the TfL EV Infrastructure Taskforce, ~~which includes EV industry representatives and wider consultation.~~ The first preference will be to install any charge points in car parks or other suitable off-street locations. Where it is essential to locate on-street, charge points will be installed in the carriageway rather than on the pavement

Through the planning process we will require the installation of rapid charge points in new developments with off-street loading. We will also encourage the owners, managers and occupiers of existing buildings with loading bays to install rapid charge points.

The provision of charging infrastructure will be kept under review to ensure it is sufficient to meet the needs of residents and vehicles serving the City without generating additional traffic. Reviews will also consider the need to update, and potentially reduce, charging infrastructure as battery technology improves.

-----TEXT BOX START-----

Existing electric vehicle charging provision

Fast charge points are currently available in all City Corporation public car parks and in the Barbican residents' car park. We are working in partnership with TfL to deliver a rapid charging hub for taxis in Baynard House car park and a single taxi only rapid charge point on Noble Street.

-----TEXT BOX END-----

Proposal 31: Request an accelerated roll out of zero emission capable buses

We will urge TfL to prioritise zero emission capable buses on routes through the Square Mile, with the expectation that all buses serving the City will be hybrid or zero emission by 2020. In the longer-term ~~we~~ we will request that all buses serving the City are electric or hydrogen by zero emission capable by 2030/2030, ahead of TfL's current commitment for all single deck and 80% of double deck buses to be zero emission or hybrid by 2035electric or hydrogen by 2035.

Proposal 32: Support small businesses to accelerate the transition to zero emission capable vehicles

We will work with the Government, TfL and manufacturers to develop incentive schemes and favourable leasing arrangements that support small businesses in acquiring zero emission capable vehicles. This will include supporting the switch to non-motor vehicle alternatives, such as cargo bikes. We will consider opportunities, such as preferential pricing for parking/loading for vehicles in this category, to provide time limited incentives to invest in zero emission capable vehicles.

~~We will encourage the Government to introduce legislative change to exclude battery weight from vehicle weight limits.~~

Proposal 33: Make the City of London's own vehicle fleet zero emissions

The City Corporation will upgrade its vehicles which operate in the Square Mile to meet the standards we set for local ZEZs. Contractors vehicles that operate within the Square Mile will also be required to meet these standards. Where possible EV charging infrastructure in City Corporation operational sites will be made available to contractors' vehicles.

Proposal 34: Reduce the level of noise from motor vehicles

The transition to zero emission capable vehicles and general traffic reduction will help to reduce noise from motor traffic. Other measures to reduce noise will include: well-maintained carriageway surfaces and utility access covers; campaigns to reduce engine idling and the inappropriate use of horns; and working with the emergency services to reduce the use and volume of sirens.

We will work with the City of London Police to undertake targeted noise enforcement of motor vehicles that do not comply with legal requirements to maintain an appropriate/type approved exhaust or are not within legal decibel limits for the vehicle type.

Proposal 35: Reduce noise from streetworks

The City Corporation will manage and seek to reduce the noise impacts of streetworks through the Code of Practice: Minimising the Environmental Impact of Streetworks. This requires contractors working for the City Corporation and third parties to use the 'best practicable means to minimise the effects of noise and dust, including:

- Restricting periods of operation of noisy activities
- Undertaking liaison with neighbours
- Using less noisy methods and equipment
- Reducing transmission and propagation of noise, for example by using noise enclosures or barriers
- Managing arrangements including contract management, planning of works, training and supervision of employees to ensure measures are implemented

A review of the Code of Practice will be undertaken by 2020 to ensure it reflects best practice, with further updates as required. The review will also consider how we can better work with TfL, utility companies and contractors to improve the level of adherence to the Code.

Proposal 36: Encourage innovation in air quality improvements and noise reduction

We will work with the Government, TfL, industry and other partners to encourage the development of innovative solutions to reduce transport related noise and emissions. For example, by supporting trials, sponsoring competitions and awards, and hosting conferences and seminars.

Proposal 37: Ensure street cleansing regimes support the provision of a world-class public realm

The City's street cleansing regime will ensure all walking routes, cycle routes and public realm areas as well as streets are cleaned to a high standard and kept free of litter.

We will reduce litter from smoking, working with Public Health to support campaigns and initiatives to stop smoking and, if necessary, prosecuting offenders.

We will continue to work with businesses to minimise the impact of waste collection on the public realm, including through time banded collections that restrict the times when rubbish and recycling can be left on the street.