

Surrey Low Emission Transport Strategy – Response

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1. Executive Summary and Introduction

Vision statement

This includes 11 aims. The strategy should be supported by an action plan that sets out how these will be delivered – in ways that are measurable and achievable (SMART objectives). These eleven start with words include many action words – but leading should be included here. Surrey County Council leadership on this issue should form part of the strategy.

Air Quality

The link between poor air quality and early death is stated on page 2 of the strategy. This is clearly set out. The extent of air quality impacts in the AQMAs, as opposed to outside of the AQMA could be set out more clearly.

Carbon Emission Reductions in Transport

Page 7 of the draft policy notes that carbon emissions reduction of transport are lagging between other sectors. Although across the UK they have reduced slightly, Figure 2.2 shows those in Surrey are rising. This should be stated clearly at the start of the report. This means that the level of reduction in emissions noted in para 2.24 will need to be higher in Surrey, if Surrey is to reduce its emissions in line with the rest of the UK.

The required reductions of emissions in each type of transport emissions should be set out.

Figure 2.1 (para 2.20) does not appear to include international aviation emissions. This should be included or made clear.

2. Problems, Challenges and Opportunities

Prominence of Climate Change in this Strategy

In deciding to merge these two strategies Surrey County Council should ensure that sufficient weight and detailed targets are included for both of these areas. While they are complementary actions that are sufficient to address one aspect (e.g. air pollution) will not be sufficient to address the other (e.g. climate change). To ensure that this does not read as an air quality strategy, with some (mainly qualitative) references to climate change these two elements should be presented as separate sections so that clearer targets for climate change actions can be set out. This includes the way these issues are introduced (e.g. statements 1.1 and 2.1), the overall targets in the introduction and action plan.

Traffic Data

Paragraph 2.4 notes the importance of road transport in causing air quality. It would be useful to set out what the current situation in Surrey is, and the current trajectory. In the last ten years how has air quality in Surrey (overall, or just due to transport) changed?

Air quality monitoring

The strategy should include targets, and a budget to increase these to ensure that all of the worse air quality areas are known, and actions taken. In particular, there should be more monitoring near sensitive receptors (e.g. schools, town centres).

Air Travel

The report makes no mention of air travel. Surrey is close to the UK's busiest one and two runway airports. Expansion of either would likely lead to a worsening of Surrey's air quality (particularly close to the airports, but also adjacent to main highway routes) and make it far more difficult for the UK to meet, let alone stay far within its carbon emission targets. Some of the AQMAs in Surrey are, at least partially due to air travel. This should be reflected in Table 2.1.

Opportunities and Challenges in Table 2.2 and the case studies from page 25 should also include:

Opportunity 1. Modal Shift. Reducing carbon emissions of transport requires a modal shift to more active, non-motorised transport (walking and cycling) and a shift to public transport (buses and trains). These will ensure that the total amount of energy used by the transport sector will reduce. In particular, the potential for modal shift from private to public transport and for car-sharing should be mentioned.

Opportunity 2. Rail electrification. There is still an opportunity for the Gatwick-Reading North Downs Railway line to be electrified. This should be reflected in this strategy.

Challenge 1. Rising Carbon Emissions due to Transport in Surrey. This is the biggest climate change challenge for transport to address climate change in Surrey. This should be included as a challenge. It is the most significant challenge.

Challenge 2. Legislation requiring Air Quality Objectives to be met. This should note that the AQMAs are currently in breach of the EU air quality objectives. The timescale for this to be addressed should be set out.

Challenge 3. Heathrow expansion. This could increase air pollution directly (from aircraft and airside surface transport) and indirectly (due to increased freight, employee and passenger transport) both in the environs of the airport and on transport routes.

Case study Opportunity – revoking of AQMAs. This notes that 4 AQMAs have been revoked since 2011. For balance, this should set out how many new AQMAs have been established in this time.

Case study Challenges. A set of case studies setting out the issues and options in relation to the challenges should also be included for balance. There could be as much to learn by reviewing how the challenges are to be addressed as from consideration of opportunities.

3. Aim and Preferred Approach

Insufficient Aim

The aim should include both reducing air pollution such that Surrey has no AQMAs and carbon emissions are reduced to zero. The aim should not be just to reduce emissions, but how far these emissions should be reduced, by when.

Two aims are recommended that are more specific:

- Firstly, to reduce carbon emissions due to transport in Surrey in line with government targets, including all vehicles being electric vehicles by 2030.
- Secondly, to eliminate AQMAs across Surrey, and set a date at which this is also to be achieved.

The set of actions that follow are therefore not sufficient, as they are not able to address air quality and carbon emissions from transport in Surrey. The distinction between what Surrey County Council can do itself, and what collectively is required, including through Surrey County Council leadership on this issue, could be more clearly set out.

4. Delivery and Indicators

The draft strategy outlines the areas where actions are considered. These should be extended, reflecting the need for timebound targets in the strategy (see section 3 above) and addressing different aspects, opportunities and challenges not currently included (see section 2 above).

This draft strategy should be developed into a clear action plan, with targets attached to principle delivery.

In particular,

- There should be annual targets for carbon emission reductions of transport in Surrey. This should be linked to investment strategies for Surrey's two LEPs are the sub-regional transport body.
- There should be a target end-date for each current AQMA in Surrey
- Annual sector targets for carbon emissions reduction in Surrey (car, freight, bus, rail) and increase in alternatives (zero-emission bus, electric taxi & private hire, rail electrification, take-up of cycling and walking) should be set out and linked to specific Surrey strategies (mostly existing) for delivery of these targets
- There should be targets for number of electric vehicle charging points, that are sufficient trajectory for all vehicles to be zero carbon across Surrey by 2030

The strategy should have budget allocated to all items in the plan, such that the plan is deliverable.