Transport for London

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Transport for London
Group Planning
Windsor House
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European Commission
Directorate-General Climate Action
Unit C2 - Transport and Ozone
B-1049 Bruxelles
Belgium

5th December 2011

Dear Sir

Consultation of the European Commission on reducing CO2 emissions from road vehicles.

Transport for London (TfL) welcomes the opportunity to comment on the proposal for CO2 limits on Heavy Duty Vehicles. In addition, TfL Group Planning would be pleased to hold a meeting with European Commission representatives to further discuss this important issue.

TfL is the strategic transport authority within Greater London responsible for implementing the Mayor`s Transport Strategy (MTS). Within the field of passenger carrying transport it manages the London buses, trams, underground railway services, the Docklands Light Railway, London Overground suburban train services, river services, licenses London taxis and promotes cycling and walking initiatives.

TfL is also responsible for major highways (580 km of roads which carry 33 per cent of all traffic, known as the Transport for London Road Network), operation of all traffic signals in the city, enforcement of the Central London Congestion Charge and the London Low Emission Zone. TfL has a legal duty to manage these networks to reduce delays on the London road network.

TfL provides funding for sustainable freight and road safety projects as well as transport scheme funding to the London Borough Councils through Local Implementation Plans.

Key policy documents which include a statutory requirement on TfL to cut CO2 emissions and contain measures to reduce CO2 emissions from transport and other sources, include The Mayor`s Transport Strategy, The Climate Change Mitigation and Energy Strategy and the London Plan.

Yours sincerely

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Response to E9: Alternatives to vehicle based GHG regulation.

- Increasing modal shift from car to attractive public transport systems, this may include incentives for reducing car usage in urban areas. Improvements to the quality, cost and availability of public transport services and infrastructure; improvements for non-motorised users (pedestrians and cyclists) particularly on approach to, and within, urban centres would encourage mode shift by making these modes more convenient and safe.

  Investments should be made in technology (engines, motors, power generation and transm direct emissions from public transport.
- Increasing public transport patronage also improves the energy performance of each vehicle's operation.

- Increasing the commercial speed and reliability of bus/public transport systems, increasing patronage which reduces the CO2 per passenger/kilometre (need to provide necessary infrastructure: bus lanes, traffic light priority etc) .

- Increase lading factors of freight vehicles, i.e. reducing empty running and under-utilisation of vehicle payload. Improving lading factors would reduce freight vehicle kilometres for the same quantity of goods. Consolidation of loads, improved opportunities for the same vehicle to transport return loads (e.g. waste) and greater use of shared vehicles / logistics facilities would help achieve this alongside use of break-bulk centres for transhipment to low emission vehicles for final leg of journey.

- Support uptake of alternative fuels in LGV/HDV particularly those with low-life-cycle CO_2 (EV, bio-methane) especially those operating over shorter delivery distances.