

# ► Air Quality

## ► Cleaning up London's air pollution consultation response

**London Councils represents London's 32 borough councils and the City of London. It is a cross-party organisation that works on behalf of all of its member authorities regardless of political persuasion.**

Please find London Councils' comments on a number of the questions and issues posed in the online survey. Please note that a number of the boroughs will also submit their own individual responses to the questions in the survey.

### Introduction

Poor air quality causes 9,400 deaths per year in London. It is urgent that this issue is addressed, and will require ambitious action. According to recent public polling conducted by London Councils, 76% of London residents believe tackling air pollution should be a priority. London Councils supports the publicity and importance the Mayor has given to this issue. But it is also essential that further education and awareness campaigns are ran to ensure the seriousness of poor air quality is recognised by all Londoners, and to gain further support from the public for ambitious measures to tackle this. London should aim to be an exemplar in dealing with air pollution, and this will require a convincing narrative on how any proposals would work on a practical level.

It is crucial that a long-term roadmap is developed showing how we will improve air quality in London well beyond the implementation of the ULEZ. London should aim for the safe levels of air pollution as set by the EU as a minimum, but have a long term view to reaching the levels set out by the World Health Organisation (WHO), which are more stringent. Additionally, in geographical terms we should aim for the whole of London to meet these levels at all times.

### Emissions Surcharge (questions 1 – 7)

#### Charge level

Generally we support the introduction of a new £10 Emissions Surcharge on the Congestion Charge, to cover the period between 2017 and the implementation of the ULEZ. There are however a few concerns regarding the details of this proposal. The operation times of the scheme, i.e. between 7am and 6pm Monday to Friday, are considered to not be stringent enough, and we would support this being implemented on a 24/7 basis. It could be argued that the Emissions Surcharge would be easier for residents to understand if applied to existing CCZ times, but this seems too simplistic and limits the effectiveness of the policy.

#### Start date

We agree with the implementation date of 23 October 2017 for the Emissions Surcharge. We feel it is necessary for a policy to cover the period between now and the implementation of the ULEZ (2019 or 2020), given the severity of air pollution in London.

#### Exemptions and discounts

The 'sunset period' as it has been proposed for the Emissions Surcharge, appears too lenient and allows a very long period at a very high discount level of 90% for the period that it is applicable (understood at this moment to be 2017 – 2020). With this proposal, residents would only be liable to pay £1 for that period, and we believe that this will not provide a big enough disincentive. The sunset period for the Emissions Surcharge (and ULEZ) needs

to be shorter, and should be on a sliding scale, beginning at 90% and reducing by a certain amount every year. This would likely have more of an impact, and influence residents' behaviour more effectively.

We understand that certain types of organisations or events in London rely on the use of historic tax class vehicles and Showman's vehicles and understand that these cannot be altered to improve their performance due to their nature. But it is a little unclear why that should mean they should not pay the Emissions Surcharge. Considering many of these vehicles are going to be some of the worst polluters, it seems counterintuitive to exempt them from the charge. It might be better to include them as standard, and then have a system where they can apply for temporary exemptions based on a time-period, therefore allowing them to meet certain obligations, such as involvement in parades, classic car shows, and fairgrounds etc., but disincentives people who own very old vehicles to drive in London outside of these periods.

London Councils supports including L-Category vehicles and 9+ seater vehicles in the Emissions Surcharge. We also believe that Private Hire Vehicles should not be exempt from the Emissions Surcharge, and welcome the fact they have been included in the ULEZ.

### **Stronger standards**

There needs to be a bigger differentiation between the petrol and diesel Euro classifications (for instance, the charge as proposed would apply to petrol and diesel Euro IV vehicles). We believe that the level for diesel vehicles is not strong enough, and propose it encompasses Euro V diesel vehicles. We believe this would have more of an impact on air pollution in central London in the period before the ULEZ is implemented, and also better prepare Londoners for that policy (which is based on a Euro VI diesel standard) by acting as a stepping stone to Euro VI diesel.

## **ULEZ** (Questions 8-13)

### **Introduction date**

Given the severity of the issue of air pollution in London, we support the idea of bringing forward the introduction of the central London ULEZ to 2019. Considering the data provided by the Mayor showing the improvements in air quality with a 2019 implementation date (40% decrease in NOx compared to a 2020 implementation), we feel this justifies the early adoption date.

### **Sunset period**

Regarding the sunset period for the ULEZ, as it is currently proposed there would be a three year 100% discount for resident. But as the Emissions Surcharge will have been introduced, the Mayor is proposing to carry forward the 90% discount from that to apply to the first three years of the ULEZ. As mentioned above, this does not appear to make sense given that this would mean that owners of more polluting vehicles would pay a 90% discounted rate across a six-to-seven year period. We do not agree with the proposal of taking this discounted rate over for the 3 year sunset period of the ULEZ. As stated above, and given the charge for both the Emissions Surcharge and ULEZ will be the same, we call for the charge to increase each year following the introduction of the Emissions Surcharge.

### **Boundary Issues**

While London Councils supports the principle of expanding the ULEZ to an area larger than the CCZ, we want to ensure that any proposal provides the best outcomes, and currently there is not enough information to suggest that the north/south circular option does that. The North/South circular (known as the inner London ULEZ) is not being seen as a particularly popular choice amongst boroughs, in its current form. The inner London ULEZ cuts through a number of boroughs and a number of concerns with this 'hard border' have been raised. These include: the issue of potential traffic displacement; the resultant increased congestion; increased air pollution in areas outside of the boundaries.

There are also concerns regarding the impact the charge could create for residents and small businesses that have to travel across this border regularly. For residents this could be those who have to commute to work via car, or for people visiting family in hospital. One approach to negating this impact for residents would be through encouraging modal shift with a diesel scrappage scheme. This could provide an option for residents to receive funding for annual travel cards in London (for 1-2 years/equivalent of funding for a new vehicle). This would encourage people to move away from using dirty vehicles. This requires increased investment in public transport, but also in cycling and walking infrastructure across London as reducing the number of vehicles in the capital is

crucial. Making public transport, walking and cycling a realistic and viable alternative to car travel is crucial if the ULEZ is to encourage modal shift. London Councils calls on the Mayor to lay-out his plans to improve public transport provision, walking and cycling infrastructure in his upcoming Transport and Environment Strategies as well as the London Plan.

The Mayor also needs to address impacts on small businesses directly. It has been suggested that a diesel scrappage scheme could be the tool to do this, and a specific focus on helping small businesses clean their fleets as part of any diesel scrappage scheme would be welcomed.

With the severity of the problem in mind London Councils has ambitions for a London-wide proposal. According to TfL's document 'Future of ULEZ: Initial Analysis of Options' from April 2016, the tightening of the LEZ would likely reduce emissions by 25% for outer London and 27% for inner London, which are substantial benefits. However, the north-south circular option potentially only delivers a 6% reduction for those in Outer London, and a marginally higher 30% reduction for inner London. This would create a more equitable improvement of air quality across London, but also remove the potential issue of displacement that could be caused with a hard inner London ULEZ boundary. It reflects the boroughs desire to ensure that this issue is tackled with the appropriate level of rigor. This could begin with a nominal charge that increases over time. This would require a clear, long term roadmap setting out the direction of travel (including charge levels, emissions limits, and types of vehicles to be affected) to provide clarity so that everyone can adjust their behaviour and spending choices accordingly.

There is real concern regarding potentially exempt roads in the ULEZ. For instance, although not included in the consultation document, many boroughs are worried about rumoured plans to exempt the A12 from the scheme. This would not be welcomed and would actively go against the Mayor's stated aim of improving air quality in the capital given that this road is one of the most polluted in the boroughs they intersect. This also relates to the issue that many of the south London boroughs have with the use of the south circular as a boundary. This road is very different in nature to the north circular section. It also misses out some of the more polluted areas such as Streatham and the A23. This is why a London wide (GLA border) boundary scheme is being urged.

London Councils strongly support the overall principle of expanding the ULEZ London-wide for heavy goods vehicles, given the serious health hazard that air pollution poses. We feel that the expansion of ULEZ London-wide for heavy vehicles should be implemented as soon as possible within reason, giving the businesses that will be affected consideration. Potentially 2019 is too soon, but there is no data to inform our decision at this time.

### Enforcement

There is a question about how to enforce a London wide scheme, for instance most resident will be travelling inside the boundary, and therefore would not be picked up by the camera network and therefore effectively going 'un-noticed' and not receiving a charge if you drive a polluting vehicle. Even though the camera network exists for the current LEZ, this proposal would require additional infrastructure, with increased levels and better strategic locating of cameras. This obviously brings knock-on issues, such as the potential for drivers to travel down smaller, residential streets to avoid cameras. This would need to be addressed, in discussion with the boroughs and TfL.

### Additional comments (Question 14)

#### Information and data

There is agreement amongst the boroughs that there is a need for more information and data behind a lot of the assumptions made in the Mayor's consultation. There is a lack of transparency about how decisions have been made. There is a need for more detailed cost/benefit analysis of different options around the expanded ULEZ boundary, and other potential proposals, so that boroughs are able to make informed decisions. It does not appear that anything other than the north/south circular ULEZ option has been considered. It is important for boroughs to understand how TfL have conducted their modelling, for instance what methodologies and data sets have been used. This allows a truly inclusive and effective discussion to take place, and ensure that a solution is found that best suits all of London's needs.

It has been confirmed by the Mayor that the inner London ULEZ would worsen air pollution in some local areas, but improve the air quality in London on average. There is a need for more information regarding the locations expected to face increased levels of air pollution. It is therefore not possible for boroughs to support this proposal without a guarantee from the Mayor that there would be additional funding for specifically developed solutions to

mitigate this. For example, the proposed Clean Bus Zones would need to cover any areas that suffered worse air quality as a result of the inner London ULEZ. Boroughs where the air quality would be made worse would be put in a very difficult situation, and would find it nearly impossible to support these plans if their residents were affected negatively, even if they supported the Mayor's objectives in principle. A solution needs to be found that benefits everyone and it is becoming increasingly clear that a London wide option is preferred. London Councils calls on the Mayor to conduct modelling on a London-wide scheme, which could be a strengthened LEZ/ULEZ that becomes stronger over time.

### **Policy cohesion**

London Councils believe it is crucial that there is a holistic approach to tackling air quality issues, and that there needs to be cohesion between the different policy areas, for instance transport policy but also green infrastructure, urban design and development, and health.

This would mean an alignment of policies and using an existing policy to raise awareness and be used as an intervention point. One example highlighted was the Direct Vision Lorries Initiative. This is a policy that would see a standard for heavy goods vehicles (HGVs) which assesses and rates how much a HGV driver can see directly from their cab in relation to other road users. TfL will then work with vehicle manufacturers and invite all HGVs to be modelled and rated against the Direct Vision Standard. This work will help operators and their clients to make informed choices when buying HGVs. This could be used as a 'hook' to make businesses consider cleaner Lorries at the same time. It is seen as another option with which to engage businesses on the ULEZ. This again, brings a more holistic approach and could make the transition to the ULEZ smoother.

There is a clear need for the Mayor to develop and inform the boroughs of supporting policies to be implemented alongside any restrictions on vehicles including mitigation measures (for example urban design and green infrastructure), and addressing the air pollution from buildings. It has been suggested that there should be some policies for the second hand car market to really influence residents beyond those buying brand new cars. This could be a requirement for all second hand cars to be easily identified by its Euro level, which could help people to make more informed decision when buying a second hand car. London Councils would also like to re-iterate its calls for Vehicle Excise Duty (VED) to be reformed. The current set-up does not do enough to penalise the most polluting vehicles. The Mayor should provide a high profile voice in the campaign to change this. This is also relevant for replacing old taxis.

Given the role The Mayor and Boroughs play in engaging and encouraging private sector organisations to adopt ULEVs as standard in their operations, London Councils notes the recent announcement by the Office for Low Emissions Vehicles (OLEV) regarding funding earmarked specifically to help businesses switch vans and trucks to electric. This is something that we encourage the Boroughs to use in their ongoing business engagement work.

### **Euro standards**

The use of the Euro standards for modelling and as a basis for the proposals is a concern, given the understanding that many vehicles do not perform in real world conditions as well as advertised under their Euro standard. Given that Euro 6c standard vehicles will be the first ones to face real-world driving tests and won't be introduced until 2017 is a worry. And even this more stringent standard will use a 110% "conformity factor" limit (which is the difference between the laboratory test and real-world conditions) until 2021. This shows that using the Euro standard is not enough to improve the air quality to the level necessary. The Mayor should not be content with aiming for a lower type of air pollution but instead be looking to encourage use of alternative, clean fuel powered vehicles. This could be done by improving the electrical vehicle charging infrastructure in London, and also working with boroughs and the private sector to develop clean LGVs and HGVs (such as hydrogen and LPG), and also improving public transport provision, and walking and cycling infrastructure as noted earlier.