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Dear Sir/Madam,

DEFRA CONSULTATION ON DRAFT PLANS TO IMPROVE AIR QUALITY – LONDON COUNCILS' RESPONSE

London Councils is committed to fighting for resources for London and getting the best possible deal for London's 33 councils. Part think-tank, part lobbying organisation, and part service provider, London Councils formulates policies, organises campaigns and runs a range of services all designed to make life better for Londoners.

Recent research by Kings College London found that nearly 9,500 premature deaths a year in London are caused by poor air quality. It is vital that all levels of government tackle this issue as quickly as possible to remove this substantial public health risk in the capital. It is disappointing, therefore, that the Government's plan places such reliance on action by local and regional authorities in London but contains very few proposals for how national policies, financial instruments and legislation may help to improve air quality.

London Councils suggests that there is a range of actions that the Government should consider, including capitalising on the VW emissions scandal to achieve agreement with other EU Member States that would ensure that Euro 6 vehicles are meeting the required emissions reductions in real world driving conditions. Government should develop proposals for how financial incentives, such as Vehicle Excise Duty, will take account of emissions of NO₂ and particulate matter, as well as CO₂, and not implement changes that would see the incentives for the vast majority of ultra low emission vehicles substantially cut from April 2017. Government should also continue to proactively support the uptake of ultra low emissions vehicles through grants and increase funding for schemes to improve air quality and reduce exposure in the worst affected areas. Further to this we would like to see Government develop proposals to introduce a national scrappage scheme for the most polluting vehicles on our roads.

London Councils strongly believes that the Government should be aiming to meet EU limit values for NO₂ by 2020 in London, as it is in all other areas. The Government's lack of consideration of what solutions it can contribute at a national level means that Londoners will be exposed to a further decade of poor air quality, resulting in unnecessary deaths. London Councils' detailed comments on the proposals are set out below.

Yours faithfully,

A handwritten signature in black ink that reads "Julian Bell". The signature is written in a cursive style with a long, sweeping underline.

CLlr Julian Bell

Chair of the London Councils Transport and Environment Committee

Defra Consultation on Draft Plans to Improve Air Quality – London Councils’ Response

Summary

- The proposals do not strike an appropriate balance between national and local action. The Government should give more consideration to what can be achieved through national policy, legislation and financial instruments.
- Government should undertake a full review, across departments, of the ways in which it is able to drive improvements in air quality. We suggest that action should be considered in the areas of transport, planning and energy efficiency.
- The Government must work with other EU Member States to ensure that Euro 6 vehicles are meeting the required emissions reductions in real world driving conditions.
- A strategic approach to the identification of Clean Air Zones is required.
- The Government should provide support to reduce emissions related to the existing operations of nationally important infrastructure that is located in London, such as Heathrow Airport.

Balance between national, regional and local roles

London Councils does not agree that the Government’s proposals strike the right balance between action at national and local (and in the case of London, regional) levels. Furthermore, we consider it unacceptable that the Government plans to meet EU limit values for NO₂ in all other areas by 2020 but not until 2025 in London. The Government’s lack of willingness to consider what solutions it can contribute at a national level means that Londoners will be exposed to a further decade of poor air quality, resulting in unnecessary deaths. We want to see an assessment of what would be required to achieve compliance in London by 2020 so that this can be debated by Londoners and all levels of authorities.

London Councils welcomes the current financial incentives from Government to drive the uptake of ultra-low emission vehicles. However, we note that the plan offers no guarantee that these will continue. We want to see ongoing commitment from the Government in the final plan, following the outcome of the CSR. We also want to see continuing support for the provision of charging infrastructure and, given that boroughs report that they are facing increasing numbers of requests to do so, we consider that Government should provide clarification on whether it is acceptable, under existing legislation, for vehicle owners to trail cables across footways to charge vehicles. It is important that the increasing demand on the national grid that will come from the growth of electric vehicles is properly planned and managed. The charging of electric vehicles must not increase the need for local electricity generation from fossil fuels in urban areas.

London Councils agrees that the onus is on the European Union to ensure that Euro 6 standard vehicles are meeting the required emissions reductions in real world driving conditions. The Government must use the VW emissions scandal as an opportunity to secure agreement on this across Europe now. If this does not happen then the benefit of London's ULEZ and the proposed Clean Air Zones will be undermined, as will the assumptions behind Defra's assessment that compliance with EU limit values in London will be achieved by 2025. No information has been provided on the overall impact of Euro 6 vehicles not meeting requirements in real world driving conditions on air quality in London, or what alternative actions may be required.

The UK Overview Document refers to the Government's ongoing review of the Clean Air Act 1993. We welcome this review but would like to see a clearer timetable for completing it. London's local councils have raised concerns that it is insufficient to prevent air pollution from Combined Heat and Power plants and small scale power generation because thresholds for restrictions are set too high. The review should consider what can be done to address this.

London Councils considers that the onus should be on the Government to undertake a full review, across departments, of the ways in which it is able to drive improvements in air quality. Within this we suggest that the Government should consider:

- 1) Developing proposals for how Vehicle Excise Duty could be reformed so that charges are based on emissions of NO₂ and particulate matter, as well as CO₂, and not implementing changes that would see the incentive for ultra low emission vehicles, except zero emission vehicles, substantially cut from April 2017.
- 2) Introducing a national scrappage scheme for the most polluting vehicles.
- 3) Committing to continuing to provide incentives to encourage the uptake of ULEVs, such as through the plug in-car and van grants, as this vehicle market matures.
- 4) Continuing to support research and development, including into Euro 6 retrofit options and viable ultra low emission heavy goods vehicles (given the proportion of total emissions in London from these vehicles identified in Defra's analysis).
- 5) Supporting London to drive the uptake of ultra low emission vehicles, including through supporting the OLEV Go Ultra Low City Scheme bid.
- 6) Providing support to reduce emissions related to the existing operations of nationally important infrastructure that is located in London, such as Heathrow Airport, and ensure that the decision over new airport capacity does not negatively impact on the UK's ability to comply with EU air quality limit values.

- 7) The impact on air quality when introducing changes to planning policy and legislation and allow planning authorities to refuse permission for schemes that would result in poorer air quality or result in unacceptable levels of exposure for new residents.
- 8) Taking account of the impact that decisions over the future of energy efficiency and low carbon energy policies, such as the Feed in Tariff, the replacement for the Green Deal and the Zero Carbon Homes policy, can have on improving air quality.
- 9) Developing a parallel plan to meet EU limit values if Euro 6 vehicles do not deliver the reductions in emissions that are expected.

Clean Air Zones

London Councils welcomes the encouragement for local authorities to introduce Clean Air Zones, where these are appropriate for their areas. However, we are highly doubtful that this is a solution to all of London's air quality problems. Interest from London's local authorities in the Mayor's proposed Low Emission Neighbourhoods suggests that, with sufficient resources and powers, some London local authorities may wish to introduce Clean Air Zones in key centres within their areas. However, these areas will need to be carefully chosen to avoid displacing pollution from one area to the next and will need to be developed alongside the Mayor's plans for extending the ULEZ. We do not believe that locally designated Clean Air Zones are appropriate to tackle all areas of poor air quality in the capital. Figure 5 of Defra's draft air quality plan for the Greater London Urban Area shows a clear relationship between London's strategic roads and the poorest air quality. A strategic approach to tackling air quality is required. The Mayor's plans for the future expansion of the ULEZ will be a key part of this, although this will depend on Euro 6 vehicles achieving emissions reductions in real-world driving conditions.

It appears from the technical assessment that a Clean Air Zone (or Zones) has been assumed to be implemented in London, in addition to the ULEZ, and that this is part of the package of measures that achieves compliance with EU limit values by 2025. The assessment suggests that this would include "the majority of road links in the area in exceedance" of the limit values. We welcome the recognition that these boundaries would be subject to local decision making and accept that the Government must rely on assumptions in testing the potential of Clean Air Zones. However, given this uncertainty and the uncertainty about Euro 6 vehicles achieving the forecast reductions in emission, we consider that the Government should have an alternative plan and must give greater consideration to what it can do to improve air quality.

Air Quality Plan for Greater London Urban Area

Defra's draft air quality plan for the Greater London Urban Area recognises that there have been a number of Mayoral initiatives to improve air quality in recent years, including investment in cycling, a roll out of cleaner buses and limits on the age of taxis and Private

Hire Vehicles. London Councils welcomes these and the forthcoming Ultra Low Emission Zone (ULEZ). We consider that the Mayor could go further by:

- Working with inner London boroughs that want to see the ULEZ expanded to their area.
- Making a greater commitment to increase the number of buses meeting the ULEZ requirements operating across the whole of London.
- Introducing a 10 year age limit for taxis, as originally proposed in the ULEZ, rather than a voluntary decommissioning scheme.
- Including a requirement in the London Local Air Quality Management system for TfL to report to boroughs annually on what it is doing to improve air quality in their areas.

We will continue to work positively with the Mayor on initiatives that we consider can improve air quality in the capital, such as the delivery of charging infrastructure for ULEVs, more efficient delivery of freight to reduce congestion and improvements in road safety to encourage cycling and walking. However, as we have noted throughout this consultation, we consider that there are many actions that the Government could take to help London's local and regional governments improve air quality to meet EU limits before 2025 and reduce the associated health risks that Londoners face.

We are concerned that the draft air quality plan for the Greater London Urban Area fails to identify Heathrow Airport as a substantial source of emissions. This is in contrast to the previous Air Quality Plan for the Greater London Urban Area (September 2011), which correctly identified the exceedance area around Heathrow as a separate area within the zone. There is no explanation for this change in approach. The background maps in Figure 6 (page 29) clearly show Heathrow as a separate pollution hotspot area as far ahead as 2030 and there are residential areas in close proximity to the boundary. Heathrow Airport is a nationally significant piece of infrastructure and the Government must play a key role in addressing emissions from it.

There are reasons to believe that, regardless of any decision to build a new runway, emissions from the airport will increase:

- The airport is operating within permitted limits for air transport movements.
- Growth in the number of large aircraft will increase direct emissions and increase the number of passengers, which will potentially increase emissions from surface transport.

We would urge the Government to include specific actions within the final Greater London Urban Area Plan to ensure this area achieves, and maintains compliance with, the EU limit values as soon as possible. We note the Airports Commission report concludes that a new runway at Heathrow should only be built when it is clear that air quality at sites around the airport will not delay compliance with EU limits. The Government must be confident that this can be achieved if it agrees that Heathrow is the best option for providing new runway

capacity and the principle must be enforced through the process of formally granting consent for the development.

Local Action

London's local councils undertake a variety of actions to tackle poor air quality in their areas. As well as encouraging walking and cycling through locally developed schemes, authorities are assisting residents and businesses that want to switch to ultra-low emission vehicles through the provision of new charging infrastructure. Some local authorities are grouping together to develop consolidation centres, charge more for parking permits from the most polluting vehicles, discourage and enforce against engine idling and insist on Construction Logistics Management Plans. Many boroughs are also focusing on educating residents, workers and visitors on the dangers of air pollution and what can be done to reduce emissions and exposure, including through schools and health professionals. Schemes to provide green infrastructure and plant trees and shrubs have also been used to absorb pollutants and shield vulnerable groups.

Barriers

London's local authorities are undertaking significant local actions despite the significant budgetary pressures that they are under and the wholly insufficient levels of funding that they receive from Government to directly tackle air quality. The consultation document indicates that there are no plans to address this, with only £500,000 available per annum to be shared between all local authorities in the UK with poor air quality. There is no suggestion of any funding being made available to support the development of Clean Air Zones. Whilst we suggest that this funding should be focused within London, given that the Government recognises that the problems are more difficult to tackle in the Capital, more funding needs to be made available nationally to show the Government is serious about addressing this issue.

Additional Action

The plan needs to include more detail on how the Government will help to mitigate the impact of poor air quality on human health prior to compliance with EU limit values. This may require additional funding for the worst affected areas to develop ways to shield the most vulnerable users from the worst pollution, for example, by ensuring that sufficient weight is placed on air quality in the planning system.