

## ► 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 submit their own individual responses to the questions in the survey.

#### **ULEZ** (Questions 3-5)

We support the Mayor's objective of implementing the ULEZ, and would support plans to bring forward the implementation of the ULEZ to September 2019 if this can be done effectively and without causing additional disruption or problems for London residents than had otherwise been considered.

London Councils welcomes plans to expand the ULEZ beyond the initial area of the current central London Congestion Zone. While there is support for the implementation of the ULEZ, there are a number of concerns regarding the proposed boundary for any expansion in the future. Before any decision can be taken, more information is required; for example further modelling of the impact on air quality and a cost/benefit analysis on the impact of the ULEZ based on the different boundary scenarios. Boundaries should be set based on the best possible data and modelling. Modelling should be conducted on all of the most prominent options, which at present are: the north-south circular option, keeping the ULEZ to its original boundary and strengthening the LEZ, and expanding the ULEZ to cover the whole of greater London. This would provide an opportunity to analyse the costs and benefits of the different options.

The north south circular road being used as a future boundary raises a number of issues, but was seen as a good option in the interim. Although some have highlighted some issues with this cutting through boroughs, which could be seen to increase the complexity of charging regimes in the capital, there needs to be a boundary somewhere. An important issue is whether the north circular road is included within the ULEZ or just provides the boundary to it, making it a bypass which would drastically reduce the effectiveness and benefits of extending the ULEZ. This could even worsen air pollution hotspots and related health concerns along the boundary of the expanded ULEZ, if the new boundary stops short of including the north circular road.

There is also a large issue with the fact that the south circular is very different in nature to the north circular, in that it is often made up of smaller, local roads moving through suburban communities. It is also not as expansive as the north circular, meaning that it would have less impact on south London. Therefore we believe there may be merits to looking at other boundary solutions, in the south especially. Greater borough engagement is needed to ensure that an acceptable boundary solution can be found, alongside a suite of acceptable policies to ensure that an expanded ULEZ doesn't cause unnecessary side effects.

We believe any extended boundary for the ULEZ should cover light and heavy vehicles but done in a way where displacement issues are minimised and local businesses are consulted. Pedestrianisation and filtered permeability should also be considered, but the issue of displacement should be monitored closely by TfL with parallel policies introduced to ensure a reduction in emissions from vehicles in the general area. When

considering pedestrianisation a flexible, varied and wide ranging approach is needed, and one which better responds to the changing demands and uses on the street throughout the day. This should also take account of the Roads Task Force street types. This could include for example, retiming deliveries and restricting traffic at certain times. Banning certain turns and movements and filtered permeability can also help to create a more 'pedestrianised' environment

The Mayor should also consider the benefits of car free days either for London or locally but they would have minimal quantitative impact in terms of air quality improvement unless they are significant in scale and regular (e.g. the Paris model where major roads are closed on the first Sunday of every month). By being both extensive and periodic, car free days have the potential to demonstrate that it is possible to function in London without cars and this is likely to have greater long term benefits. Although, more work needs to be done in understanding the best areas to include in any such plan, and to make sure that provisions for car free days are provided for the outer London areas more reliant on private vehicles.

### **Diesel Scrapage Scheme** (Questions 6-10)

We strongly support plans for a diesel scrapage scheme but would welcome more information on the nature of the scheme proposed – such as the scope of the vehicles to be included, and any requirements on participants. There is also concern that, even with a financial incentive, many households will not be able to afford to replace their old cars. The potential for the scrapage scheme to work on a means tested basis could provide welcome assurance that these proposals will not adversely affect people on lower incomes.

We would also encourage plans for a diesel scrapage scheme to be taken forward in order to influence the Autumn Budget to make the scheme a nationwide policy, given that air pollution is not just a London problem. This would also help to fight the traffic that comes into London from elsewhere, as well as tackle the issues of air pollution within London by residents. London Councils does caution of a move away from a focus on carbon emissions, with any move away from diesel needing to encourage the right kind of take-up of other forms of transport (i.e. different modes or if a private vehicle, it should be fully electric, hydrogen, hybrid, or cleaner petrol). However, the benefits of whether a car-for-car substitution scrapage scheme is the most effective use of public funds in the context of air quality need to be looked at in more detail and compared to an approach which incentivises the ending of inessential car use. This could either be a separate approach, through investment in improved cycling, freight consolidation and low emission vehicle infrastructure, for example. Or by including certain incentives within the scrapage scheme through, for example, free/subsidised bikes, oyster cards or season tickets, and membership of car clubs.

London Councils welcomes plans for air pollution alerts to raise awareness of the issue particularly through electronic signs on roads and at public transport stations, email, text messages, television, radio and online formats, for example the TfL website and other journey planner sites and mobile applications.

We also support a boiler scrapage scheme funded by the Mayor, providing lessons are learnt from the previous boiler scrapage scheme to ensure efficiencies and good value for money through transfer of knowledge and learning.

### **Emissions Surcharge** (Questions 11-16)

London Councils and the London boroughs agree on this in principle, but have the following comments to make on the various aspects of this proposal.

We support a daily emissions surcharge for all non-compliant vehicles (Euro IV and older). The concept of the Congestion Charge and Low Emission Zone are already well understood by drivers in London. But we feel it is important that the impact on local businesses is considered, and businesses likely to be affected should be engaged with on this issue as it could cause a number of challenges if not addressed directly.

The implementation of the Emissions Surcharge under the same hours of operation as the Congestion Charge (0700 – 1800, Monday to Friday) would make things simpler initially. But there could be merit in understanding the potential impact of extending these hours to 24 hours a day, 7 days a week. Ideally, TfL should undertake modelling to assess the impact of extending the operating hours, taking into consideration the fact that the periods of non-compliance coincide with periods of high pedestrian numbers within the congestion charge zone. TfL

should also model the impacts of extended hours on freight services, taking into account the potential contribution to other policy objectives, such as freight retiming or consolidation.

There is concern that the t-charge sets the same limits on petrol and diesel despite different emissions performance profiles, and that the Euro IV limit would fail to tackle the issue of air pollution from diesel vehicles effectively. There is also an inconsistency in treating petrol and diesel vehicles alike for the t-charge, but not for the ULEZ. Given that the t-charge's main focus is air quality, there should be research into the impacts of only banning diesel vehicles, given their emissions profile. Modelling should be conducted on the different effects of banning just diesel vehicles, and the banning of both diesel and petrol.

London Councils agrees that there needs to be a reduction for residents of the emissions surcharge. The 90% reduction on the current Congestion Charge amount may be a good starting point, but the benefits of a decreasing scale of subsidy over time should be investigated, alongside different charge levels for different vehicles. This would do more to encourage behaviour change. There may also be a need to revisit the reduction amount, following any future expansion to the ULEZ, given the number of residents that would then be affected.

Given the fact that large vehicles (in this case, vehicles with nine seats or more) create more pollution, we agree that vehicles of this nature should also pay the Emissions Surcharge.

### **Additional comments** (Questions 17–18)

#### **The ULEZ**

We seek assurances from TfL that any surplus income from the ULEZ and emissions surcharge will be ring fenced and used for measures that improve air quality standards in London, for example investment in electric buses, electric taxis, electric charging points or more sustainable modes of transport, especially walking and cycling.

The ULEZ alone will not solve London's air quality problems, not least for the areas outside the zone. Whilst acknowledging the Transport Emissions Road Map and funding schemes for boroughs to deliver local air quality improvements, we strongly encourage the Mayor to continue to prioritise air quality improvements, establish ways to reduce air pollution levels to below the legal limit, and work with boroughs to ensure the benefits of the ULEZ are felt across London.

#### **Mitigation**

We support the greater use of green infrastructure and urban greening (for instance the use of green walls, roofs and screens in public areas, and more strategic planning of green spaces) as a means of mitigating air pollution. London Councils also supports national clean air zones which could be implemented with the adoption of a new Clean Air Act - to help bring about a change in culture on this issue, and help to make it a national priority. Freight consolidation and air quality impacts of changing consumer behaviour should also be considered by the Mayor as important factors for improving air quality.

#### **Clean Bus Corridors**

We also ask that details of the Clean Bus Corridors are released as soon as possible.

#### **Contextual approach**

Needless to say, London Councils believes any proposals that intend to improve air quality in London that will place stricter controls on private vehicles need to be supported by strong public transport provisions and co-ordinated strategies to improve the traffic experience of the public in the areas likely to be affected. Therefore it is important that there are specialised approaches to tackling air quality for the different areas of London Boroughs given the different traffic contexts across the capital. The context for tackling air quality needs to be seen in the context of the outer London boroughs where there is a greater reliance on private vehicles, and specifically in the southern boroughs given the limited public transport provision, and the issues that have arisen with the Southern Rail franchise. This approach can fit into the Mayor's transport and air quality strategies through a greater focus on ensuring that public transport provision in outer London boroughs is increased, and is ultra-low emissions capable.