

► 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.

Introduction

Nearly 9,500 people die each year in London due to long-term exposure to air pollution¹. 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 run 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 for Particulate Matter (PM). Additionally, in geographical terms we should aim for the whole of London to meet these levels at all times with the area around Heathrow being a significant outer London location with notably poor air quality.

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, and undermines the Mayor's commitment to improving air quality as it sends out the wrong message that it is a part-time issue.

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.

¹ King's College London (2015) Understanding the health impacts of air pollution in London

Sunset Period

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.

Exemptions and discounts

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.

Figure 12 of the Mayor's consultation information document (page 41) shows that 36% of NOx emissions from pre-Euro 4/IV in central London come from taxis. This is by far the largest portion of NOx emissions by vehicle type. This means the exemption for taxis in the Emissions Surcharge is counterintuitive to the overall aims of the Mayor, and London Councils proposes that they are included in this policy. London Councils also opposes the exemption and/or 100% discount for the following vehicle types: two-wheeled motorbikes (and sidecars) and mopeds, specialist off-road vehicles, e.g. tractors and mobile cranes, commercial vehicles constructed before 1973, Ministry of Defence vehicles, accredited breakdown vehicles, roadside recovery vehicles, and private hire vehicles. London Councils supports including L-Category vehicles and 9+ seater vehicles in the Emissions Surcharge.

We would like to request more information around how enforcement of the blue badge exemption from the Emissions Surcharge would work in practice, given that they are registered to individuals and not vehicles.

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)**Start 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. But it is crucial that the scheme is as impactful as possible, and thus must be thoroughly developed and the complexities and impact of its implementation must be fully investigated and understood.

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 (which would be £1) across a six-to-seven year period. TfL would need to show some detailed economic modelling on impacts to justify this. However, 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. A diesel scrappage scheme could be an effective tool to help residents become compliant.

Boundary Issues

One of the main challenges highlighted by boroughs with the inner London ULEZ is the fact that the north/south circular cuts through their boundaries, which could raise a few issues. These include: the issue of potential traffic displacement; the resultant increased congestion; and increased air pollution in areas outside of the boundaries. At the December 2016 Transport and Environment Committee, to address the above problem it emerged that there were different borough views on further expansion to ULEZ with some opposing, mainly in outer London; and some supporting this proposal. The majority of boroughs expressed the view that they would be supportive of the extension of the boundary to include all of London.

Mitigation options

London Councils are concerned about 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 incentivise people to move away from using dirty vehicles. This requires increased investment in improved public transport provision, but also in cycling and walking infrastructure across London as reducing the number of vehicles in the capital is crucial. We need to make public transport and active travel modes a realistic and viable alternative to car travel, especially in areas of outer London that rely more heavily on private vehicles. We welcome the recent announcement of the Mayor to invest £770m in cycling support schemes and infrastructure over the course of his term. We also want to highlight the fact that improving the urban realm across London and supporting people to walk more is also important.

The Mayor should 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.

Exempt Roads

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 certain roads from the scheme, for example the A12, A2/A20 and A406. 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. London Councils welcomes plans for a Clean Bus Zone in this area, but more needs to be done in areas outside of the north/south circular to improve air quality.

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. To inform whether this could be implemented as soon as 2019, TfL could look to work High Speed 2 undertook as part of Camden Council's negotiations with them. The project involved Camden Council, HS2, TfL and Arup. They produced a report into how feasible it was for HS2 to only use Euro VI HGVs in Camden. This work included some research on the make-up of HGV fleets, market availability of Euro VI HGVs etc. The work concluded that there were enough Euro VI HGVs on the market for HS2 to use and that the HGV market would be able to adhere to a London-wide ULEZ for HGVs².

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

² Study on the use of low emission vehicle in London during construction of HS2 (2016)

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 the worsened air quality in these specific areas. 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.

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 health policy and development and planning policies which incorporate green infrastructure and urban design, and engendering behavioural change amongst London residents and businesses.

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.

Emissions Surcharge / ULEZ revenue

London Councils requests that any revenue raised as a result of these schemes (Emissions Surcharge and ULEZ) above the operating costs, should be ring-fenced exclusively for investment in air quality improvement or active and sustainable travel projects.