

▶ Air Quality

▶ Defra Air Quality Plan London Councils 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

Air pollution contributes to approximately 40,000 deaths each year across the whole of the UK. Nearly 9,400 of those deaths are in London¹ alone. It is urgent that this issue, which is widely recognised as a public health emergency, is addressed, and will require ambitious action. While Defra's Air Quality Plan makes it clear that London has the highest NO₂ exceedance in the UK and that the task of reducing air pollution in the city is the "most challenging in the Country", the strategy itself is not directly relevant to London's local authorities. Local authorities already have the powers to introduce Clean Air Zones, and London has already announced plans for such a policy with the ULEZ in central London. So with the actions currently being undertaken, or are planned to be undertaken, by the London boroughs and Greater London Authority, London already goes beyond what is proposed in the Government's air quality plan. But, considering that air pollution does not respect administrative boundaries it is important that the UK as a whole reduces its air pollution to safe levels as soon as possible.

Consultation questions

1. How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

Overall, the draft Defra Air Quality Plan commits to very little action that will be taken by government itself and looks to place the responsibility of dealing with air pollution onto local authorities, without clarity on appropriate regulatory or financial support. Local authorities are already doing excellent work on tackling air pollution, against the backdrop of continually reducing local authority funding. Whilst local authorities are best placed to provide the solutions appropriate for their locations and contexts, we believe that central government has a crucial role in ensuring they are adequately supported to do this. Central government needs to do more with regard to dealing with the causes of air pollution at a national level.

We feel that there are a number of key points missing from the document, such as the lack of specific proposals on how to address private vehicles, a focus on reducing car use and encouraging modal shift to more active and sustainable travel options, and does not mention investment in publically available electric vehicles charging point networks.

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

2. **What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it?**

What factors should local authorities consider when assessing impacts on businesses?

Local authorities in London have been implementing policies seen in the proposals for the Clean Air Zones for a number of years. The Ultra Low Emission Zone in London is equivalent to a Clean Air Zone category D, and this must be the minimum standard required.

3. **How can Government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to assess them?**

Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects.

How can Government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives.

How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?

London Councils believes that government funds should be targeted in areas with the highest levels of air pollution and where the largest number of people are exposed to high levels of pollution. The funding should also be targeted proportionately at the various sources of air pollution, to deliver solutions that provide the largest number of benefits. Encouraging people to use alternative methods of transport to their private vehicles should be a key aim of any city area. The Government needs to support the uptake of improved public transport services, and also increased support for walking and cycling provision in local authorities.

The document states that support to local authorities could be provided for local schemes for retrofitting vehicles. Whilst retrofitting vehicles will be important to meet short-term air quality targets, in the long-term, clean, alternatively fuelled vehicles will be needed, and there is a lack of detail about this in the plan.

The plan does not make any commitments with regard to a diesel scrappage scheme, which is widely seen as a key tool in removing some of the most polluting vehicles off the road. London Councils have previously called for a diesel scrappage scheme and it is clear that this would need to focus on the oldest vehicles, alongside people on the lowest incomes, and small businesses reliant on their vehicles.

Local authorities need regulatory powers to control emissions from other sources of air pollution, not just transport, for example appliances such as boilers, combined heat and power plant and generators. The government should introduce a new Clean Air Act which could address many of these issues, as the existing Act (1993) needs updating as it does not reflect the situation seen in cities today.

4. **How best can governments work with local communities to monitor local interventions and evaluate their impact?**

The Government and the devolved administrations are committed to an evidence-based approach to policy delivery and will closely monitor the implementation of the plan and evaluate the progress on delivering its objective.

The government needs to ensure that local authorities, including in London, have the necessary fiscal support to ensure that they are able to monitor air pollution in their areas effectively, and are then able to monitor any impacts on air quality due to interventions. Many local authorities are struggling to provide the resources necessary to meet their statutory requirements now, and imposing further requirements on them without adequate support could jeopardise the effectiveness of their work.

5. Which vehicles should be prioritised for government-funded retrofit schemes?

We welcome views from stakeholders as to how a future scheme could support new technologies and innovative solutions for other vehicle types, and would welcome evidence from stakeholders on emerging technologies. We currently anticipate that this funding could support modifications to buses, coaches, HGVs, vans and black cabs.

Diesel vehicles older than Euro 6 should be prioritised for retrofit programmes. This should include HGVs, LGVs, buses and coaches, taxis and private hire vehicles. But, we believe that retrofitting vehicles to be compliant should only be seen as a short-to-medium term option. Reduction in car use in urban areas needs to be encouraged, as does the use of zero emission vehicles (at exhaust).

The issue of delivery vehicles and how to ensure their efficient use needs to be investigated, as does the travel patterns of HGVs in urban areas.

6. What type of environmental and other information should be made available to help consumers choose which cars to buy?

London Councils support plans to make environmental performance of vehicles more visible at the point of purchase in order to encourage people to buy cleaner vehicles. It is important for vehicles to include information on CO₂ and air pollutants (NO_x and PM).

7. How could the Government further support innovative technological solutions and localised measures to improve air quality?

The government should review the powers that local authorities have at their disposal to tackle poor air quality and introduce a new Clean Air Act detailing this, for example allowing local authorities to tackle non-road based sources of emissions.

The government should amend the fiscal incentives in place for purchasing vehicles. This should include: changing Vehicle Excise Duty to disincentive the use of the dirtiest vehicles in the long term; and adjusting company car tax in a similar way.

8. Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?

The draft air quality plan published is not clear on the specific details of how the UK will tackle air pollution and the action that central government would take to improve air quality in the UK. The document refers to a number of policies that have previously been announced, such as the funding for electric taxis and hydrogen vehicles and infrastructure.

London Councils supports additional funding to accelerate the uptake of hydrogen vehicles and infrastructure. These ambitions need to be closely aligned and planned with electric vehicle infrastructure, and the wider decarbonisation of the UK heat system. It is key to consider the future of the decarbonisation of the UK heat system when designing and implementing long-term policy frameworks for Ultra Low Emission Vehicles (ULEVs). Heat in the UK needs to be decarbonised, and there is a lot of discussion around the most appropriate way to do this. It is most likely that a combination of different factors will be needed, based on the different characteristics of different geographical contexts. With this in mind, using hydrogen gas for heating may be one such option, and the relationship between heat and transport will need to be designed carefully.

A number of the policies highlighted in the plan are being introduced as a result of regulations from the European Commissions, such as new Real Driving Emissions requirements to address real world NOx emissions and new emissions standards for non-road mobile machinery (NRMM). It is crucial that the government confirms that following the UK's exit from the European Union, that air quality standards are maintained at current, or improved, levels. This is an opportunity for the UK to be a world leader in green technologies, and should be used to boost the ever-growing green economy.