

▶ Air Quality

▶ Cleaning up London's air pollution consultation Phase 3b - 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

UK air pollution is a public health emergency. In London, nearly 9,500 people die prematurely each year due to long-term exposure to air pollution¹. It is urgent that this issue is addressed, and will require ambitious action. According to public polling conducted by London Councils, 76 per cent 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.

Throughout the different phases of the Mayor's consultation we have sought to highlight the important role that boroughs play in achieving these aims, and the central role they must play in shaping the solutions for the future.

London boroughs recognise that air pollution is a critical issue that must be tackled and are therefore very supportive of actions to improve air quality in areas across the capital and welcome the principle of an Ultra Low Emission Zone (ULEZ).

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

The majority of boroughs support the proposals as a good first step to cleaning up London's air and would also like to see robust plans for an extension to all of Greater London to ensure that all Londoners can benefit from air quality improvements.

Proposal 1: Expanding the ULEZ

With the Ultra Low Emission Zone (ULEZ) now confirmed to be launching in the Congestion Charge Zone in April 2019, the Mayor is proposing to expand this up to but not including the north-south circular roads on 25 October 2021. The expanded zone will apply to the same vehicle standards as the central London ULEZ, which are:

- Euro 4 for petrol;
- Euro 6 for diesel.

Concerns about the current proposal

Displacement of dirty vehicles and air pollution

The proposed boundary dissects 14 boroughs who are all very concerned about the displacement of vehicles, and do not feel that sufficient modelling and cost data has been made available to make an informed decision. We therefore ask TfL to work further with borough officers on the type of information that is required to enable boroughs to make well informed decisions on behalf of their residents. Boroughs have been informed that TfL's modelling does not show significant issues with displacement as the north south circular is the quickest route to get around central London anyway. However, there is little to no data available on displacement in localised areas on a borough specific basis. We would ask that TfL continues to engage with the boroughs on this issue in order to address any fears they may have about displacement.

The 14 boroughs that are dissected by the proposed boundary are worried about negatively affecting a large portion of their residents financially and in terms of air pollution. Again, boroughs need robust modelling to show that there will not be significant negative effects, before they will be able to support the proposed boundary.

There is also a concern regarding displacement of older vehicles from central to outer London, both in the second hand car market, but also in the bus, freight, taxi and private hire vehicles (PHV) fleets. London Councils seeks assurances from the Mayor and TfL that once the older, dirtier buses and taxis are replaced by cleaner vehicles in central and inner London they will not be deployed in outer London

considering the impact buses have on air pollution. This would be counter-productive to the Mayor's air quality and fairness objectives.

Cost

The Mayor recently published an indicative cost of implementing the inner London ULEZ of £130m². This comes from the five-year £800m plan to improve London's air quality. Boroughs need to be sighted on the potential cost of installing the network of cameras, road signs and road markings and when TfL estimates the revenue will have paid for itself, to make an informed decision. Any significant funding pressures have a direct effect on borough budgets, as has recently been shown through the unplanned LIP cuts.

Additionally the boroughs haven't been given the opportunity to scrutinise the details around the inner London ULEZ camera enforcement network. Assurances need to be given around the enforcement approach and whether it would lead to the reductions projected by TfL, and this would come from boroughs being given access to the modelling data used.

London is not able to access any of the £220m Clean Air Fund from the Department of Environment, Food and Rural Affairs (Defra). London Councils would work collaboratively with the Mayor to help London get the funding it deserves in order to tackle this problem. One area where additional funding would be very welcome and helpful is the installation of further air quality monitoring stations, particularly those that measure PM 2.5, of which there is a shortage in London. This would enable us to get a better understanding of PM2.5 levels across London and help us to move beyond EU targets and towards World Health Organisation (WHO) limit values.

Woolwich Ferry/anomalies

There is a specific issue with the north/south circular boundary and the Woolwich Ferry. The ULEZ is proposed to run 24/7 whilst the Woolwich Ferry does not – it runs between 6:10am to 20:00pm (11:30am to 19:30pm Sundays and not at all on Christmas Day, Boxing Day and New Year's Day). Outside the operating hours of the Ferry, traffic will have to divert either via the Blackwall Tunnel, and therefore will be liable to the ULEZ charge, or drive to the Dartford Crossing (a round trip of nearly 30 miles) and liable to pay a toll to cross the Thames. Additionally the ferry service has a lower capacity than a fixed road crossing in terms of vehicle-carrying capacity, with a capacity around 5% of that of the

² <https://www.london.gov.uk/press-releases/mayoral/londons-air-quality-still-within-legal-limits>

Blackwall Tunnel³. This can lead to a significant wait to access the Ferry and the extra traffic will make that wait longer. It is possible that rather than wait to board the ferry, which could take a long time, drivers may choose to pay the ULEZ charge and use the Blackwall Tunnel and this would be a problem for boroughs on the access roads leading to the tunnel and reduce the impacts of the ULEZ itself.

Fully funded low/zero emission zones

London Councils believes that the Mayor, in collaboration with willing boroughs, should start developing the local low/zero emission zones in areas of high concentrations of air pollution across London mentioned in the draft Mayor's Transport Strategy immediately. This could transform local town centres in line with the Mayor's Healthy Streets approach, helping to promote modal shift, encourage use of electric and/or hydrogen vehicles and install green infrastructure. This would allow boroughs flexibility in reducing their local air pollution concentrations, whilst providing marked benefits across the whole of London.

We believe that there needs to be more meaningful engagement with the boroughs on this issue to collaboratively develop solutions that work for all stakeholders and clean up London's dirty air. The boroughs are the key delivery agents for innovative air quality projects, and have shown their willingness and effectiveness in this area for years.

Air quality has risen up the political agenda in recent years. To ensure this momentum is not lost and to grasp the public's willingness to act, there needs to be coordinated awareness raising and behaviour change campaigns alongside hard measures to improve air quality. London Councils' public polling on air quality issues showed that 48 per cent of people were willing to walk and cycle more, with 42 per cent willing to use public transport more and 34 per cent willing to buy a cleaner model of car in order to tackle air pollution.

It has been noted that a number of areas of London will still exceed the NO₂ limit value as late as 2025 after an inner ULEZ has been implemented. It is unknown if a London-wide scheme would bring these areas in line with the EU standards as no modelling is shown for this. Further support and funding is required to ensure these areas meet the national standards. Heathrow airport is one of these air pollution hotspots. Depending on the final ULEZ scheme, Heathrow airport will potentially require further measures to address this situation regardless of any decision about its future.

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010021/TR010021-001022-TfL%208.51%20Woolwich%20Ferry%20Waiting%20Area%20Improvement%20Study.pdf>

Operation

There has been no discussion regarding the practicalities of everyday operation of the ULEZ and no acknowledgement of the potential knock-on impacts to the wider road network. What, if any, is the financial cost to boroughs for example in terms of traffic management and enforcement? What are the procedures in the case of an accident on the north south circular/road closures? What are the protocols for communications between TfL and the boroughs on this? These points will need to be addressed before any proposal is implemented.

We would urge the Mayor to monitor and report on the impact of the expanded ULEZ, if adopted, within 3 months of introduction and regularly thereafter, and commit to making necessary changes where issues arise, in collaboration with the boroughs.

Proposal 2: Strengthening the LEZ standards

The consultation also proposes tightening the existing Low Emission Zone standards for heavy vehicles. This would introduce a Euro VI requirement (matching the current ULEZ standard) London-wide for heavy vehicles (HGVs, buses, coaches and other specialist vehicles) from 26 October 2020.

London Councils supports the moves to strengthen the LEZ standards given the pollution that is currently emitted by Heavy Goods Vehicles (HGVs) in London (21 per cent of NO_x in greater London in 2013).

There is one area that is a cause for concern. The existing London-wide LEZ sets a Euro 3 PM emission standard for large diesel vans (vans between 1.205 tonnes unladen and 3.5 tonnes gross vehicle weight). This consultation is proposing to maintain that standard. We do not believe that this is fair, nor do we believe that it is in-keeping with the Mayor's stated ambitions of making London's air the cleanest of any major city. The consultation documents do not provide enough information as to why the Mayor is proposing to maintain this standard at Euro 3 PM for large diesel vans when it is ten times weaker than Euro 6. We believe that the Mayor should tighten this standard in line with other increases (to Euro 6) to improve the air quality impact from all vehicles.

Additional comments

Data and modelling

In our previous responses we asked TfL to undertake and share more detail of their modelling work behind the proposals being made. We welcome TfL's willingness to engage on this issue and recognise that more detailed modelling has been shared with the boroughs prior and during this stage of the consultation. However the focus of the modelling isn't particularly helpful to individual boroughs as it focuses on central, inner and outer London. The boroughs are keen to understand more about the impact, in detail, around the boundary areas within their own local authority areas. The documents aren't clear on whether there are any areas in London (particularly on the boundary) where the introduction of the ULEZ would delay compliance with national objectives. The Jacobs environmental impact study reviewed impacts in terms of 'central' 'inner' & 'outer', and should have more of a focus on the areas around the border. There is also some concern that the measures will have some negative impacts on some sections of society, for instance low-income workers and children from low-income families and disabled owners of non-compliant disability tax-registered private vehicles.

As stated above, the London-wide boundary option has not been explored in enough detail. This work has been requested for four years now, ever since the idea of an ULEZ has been on the table for London. London Councils, through regular meetings with the TfL Commissioner had received a number of assurances that this would be undertaken.

Long term plans

Whilst we welcome the information provided by the Mayor of his long term plans for improving air quality in London in the draft Mayor's Transport Strategy (published in June 2017) there is still a lack of detail around the practical implications of the Mayor's objectives. In the draft MTS there was a target for Local Zero Emission Zones to be introduced in 2025 but there is no information about where or how this would be done, and how this would be financed. This has now been brought forward to 2020, which we welcome, but it also gives this even more urgency. The boroughs are the key delivery agents for such a policy, and therefore need to be engaged and supported to do this in their areas as appropriate and as soon as possible. We ask for the Mayor to begin developing a detailed long-term roadmap with the boroughs immediately.

Likewise, the MTS refers to an all London ULEZ by 2050, which we believe not to be soon enough. We have consistently asked for a robust cost/benefit analysis and clear steps that gives all stakeholders, including boroughs, businesses and residents enough time to prepare for these changes. The Mayor, collaboratively with the boroughs, also needs to confirm how the public transport offer can be improved in mainly outer London boroughs to ensure that realistic alternatives to the private car exist in those areas.

Other than the Mayor's actions on buses, taxis and PHVs there isn't much information about how TfL is going to reduce pollution from the wider Transport for London Road Network (TLRN) which often contributes the most to local air pollution concentrations.

Another concern from boroughs is the impact of the ULEZ on small businesses. There needs to be a discussion around what London can do to improve the availability of ULEVs on the 2nd hand and leasing markets. London Councils is willing to work with the Mayor and all relevant stakeholders on this.