

**Sadiq Khan**

Mayor of London

(Sent via email [mayor@london.gov.uk](mailto:mayor@london.gov.uk))

29 July 2016

Dear Sadiq,

**Air pollution consultation**

Thank you for the opportunity to respond to this initial consultation on proposed solutions to London's air pollution crisis. This response reflects the views of a majority of the Environment Committee. The dissenting views of the Conservative Group are covered in the Appendix.

We welcome your early attention to air pollution issues, your prompt proposals to tackle it, and your heed to the Committee's calls to bring forward and widen the ULEZ. We also welcome proposals for an interim emissions surcharge (the 'T-charge') and are likely to respond to the formal consultations on each measure when they are published. We also welcome the recent announcement of cleaner buses being rolled out on some routes as well as the funding for additional low emission neighbourhoods, and look forward to seeing the benefits of the schemes.

At our meeting on 13 July 2016, we heard from GLA officers and representatives from a range of organisations on the subject of air pollution. In particular, the meeting provided an opportunity to sound out areas where the recent proposals would benefit from further consideration.

**Emissions surcharge (T-charge)**

We welcome the early introduction of an emissions-based charge. We support the use of the C-charge zone as the most practical basis for early introduction.

We suggest that an option for a T-charge exemption standard of Euro 5 for diesel vehicles be included in the autumn consultation. The T-charge is currently proposed to have the same exemption standard for diesel vehicles as petrol vehicles (Euro 4 – diesel vehicles this old have been banned from inner Berlin since 2010). This is a much weaker standard than the future ULEZ (Euro 6 for diesels) and the estimate is that the T-charge will reduce car-based NO<sub>x</sub> emissions in central London by just four per cent. A Euro 5 exemption standard for diesel vehicles would lead to a greater reduction in emissions. It would also give a clearer signal of your intention for the future ULEZ (we heard from your officials that it is a principal purpose of the T-charge to signal your intention for the ULEZ).

*The T-charge post 2019*

We recommend that the T-charge should end in 2019 when it is superseded by the ULEZ. The ULEZ will equal or exceed the T-charge in area covered, time of operation, vehicles affected and the size of the charge. Maintaining an additional charge applicable to some of the vehicles some

of the time would create too much complexity, and would have questionable justification in terms of emissions (as Euro 4 and 5 diesel cars are likely to emit as much NO<sub>x</sub> as older vehicles).

### **ULEZ**

We welcome the proposal to bring the ULEZ forward from 2020, which is in line with our response to the initial consultation on the ULEZ. The current proposal is for the ULEZ to begin in September 2019; we would welcome a much earlier implementation, such as 2018 or the beginning of 2019.

#### *2020 expansion*

We also welcome the proposal to expand the ULEZ beyond the central zone, which is also in line with our original consultation response.

The proposed boundary for cars of the North and South Circular Roads has practical considerations to recommend it, but may not be sufficient to deal with London's air pollution problems. A larger zone might be required and this should be included in the final consultation. We would also anticipate seeing in the detailed consultation the kinds of specific boundary design that we see in the central C-charge zone, including certain 'buffer zones' for the residents' discount and drawing the boundary on the inner side of very sensitive destinations like hospitals. This is in addition to the inclusion of options to take more account of the desire of some boroughs to include more of their areas in the zone.

A London-wide zone for heavy vehicles matches the existing Low Emission Zone (LEZ) and is therefore very practical.

Implementing these expansions at the beginning of 2020, rather than late in the year, would help to ensure they are securely delivered within your current term of office, as well as bringing forward their air pollution benefits for Londoners.

Further urgent consideration should be given to how to tackle car emissions in pollution hotspots in outer London, such as around Heathrow Airport. An option should be included in the consultation to extend the ULEZ to all of London for cars, motorcycles and vans as well as heavy vehicles. Options could include doing so from 2020 or from a later date.

### **Financial costs and mitigation**

While the T-charge and ULEZ are intended to be a financial deterrent, it is important that appropriate strategies are considered and promoted to help Londoners find affordable transport solutions following their introduction.

Promotion of public transport and active travel (walking and cycling) should be prioritised in the final consultation. These ease the intense pressure on our road space, as well as reducing pollution.

The Committee heard that the proposed £10 T-charge has been chosen as an amount most likely to encourage people to switch their vehicle. Given that compliant petrol vehicles can be up to 12 years old, there are plenty of second-hand options and this can be promoted as an affordable strategy for meeting the terms of the T-charge. In the case of diesel cars, switching to other diesels at the Euro 4 or 5 standard, that are high-polluting though they may meet the T-charge exemption standard, should be discouraged. The imminent Euro 6 standard for diesels under the

ULEZ (and, if adopted, the Euro 5 standard for diesels that we recommend for the T-charge) can be used to highlight the message that diesels are not the best choice for urban driving.

The Committee welcomes your emphasis on the importance of a diesel scrappage scheme in enabling this switch, and joins you in calling for the Government to take this forward urgently. It is important that such a scheme moves users from diesel cars to either walking or cycling, or much cleaner alternatives (ideally electric or hybrid vehicles or other modes of transport) rather than into other diesel vehicles that still emit dangerous levels of NO<sub>x</sub>. The GLA has commissioned work to consider diesel scrappage in more depth and the Committee looks forward to this publication.

Other diesel trade-in incentives were discussed at the meeting, including the installation of bike hangars in, and vouchers for sustainable travel choices.

The Committee is interested in ways to support the growth and use of low-emission car clubs. We welcome your target for 50 per cent of car club vehicles to be electric and the promised installation of 1,000 new charging points, but consider that 2020 could be a more suitable target date than 2025. Finding ways to make car clubs less polluting and more convenient to use will be crucial to them developing a larger share of the transport market.

#### *Exemptions for those in need*

The current exemptions to the C-charge are not always flexible enough to protect all of those in need of support. The British Lung Foundation drew our attention to the plight of people, such as those with intermittent lung conditions, who find public transport or active travel difficult, but who do not qualify for blue badges.

#### **Alerts**

We agree that more people need to know when air pollution is expected to be high and what they can do about it, both to reduce their exposure and to reduce their emissions. Timely awareness (for example, a warning the day before) is important, as well as additional alerts during episodes. You should make most effective use of the available channels of communication, such as electronic road signs and social media. You should also establish the standards for expected pollution to trigger alert work, such as any expectation of a certain high level of pollution, or of a more moderate level for a certain number of days.

Londoners need to be well informed not only about spikes in pollution levels, but also more generally about the risks and avoidance measures that can be taken. Prolonged exposure is a greater health risk than exposure to extreme and infrequent episodes. Therefore there is an argument for a day-to-day pollution communication strategy – to encourage longer-term behaviour change – in addition to episodic alerts.

#### **Buses**

Your manifesto pledged to introduce Clean Bus Corridors (putting only clean buses on routes that use the most polluted roads) and to purchase only electric or hydrogen buses after 2020.

You have now announced the implementation of Clean Bus Corridors, which are a welcome contribution to meeting legal pollutant limits. However, the effect should not be that pollution is reduced especially on roads with official monitors, risking a misleading impression of lower pollution that is not reflected elsewhere.

We welcome the assurance we heard from your staff that there will be a London-wide clean-up of the bus fleet, starting with the initial corridors but then widening.

Further to your recent announcement of purchasing only hybrid or cleaner buses from 2018, will you then move on to implement your manifesto commitment of purchasing only zero-emission buses from 2020?

### **Further developments**

Despite the focus that you and your predecessors have already placed on tackling air pollution, London's measures to reduce it lag behind those of some other European cities. London is a long way from meeting WHO standards on air pollution; we heard from the Clean Air in London campaign that it will be impossible to achieve these until diesel vehicles are eliminated from central London – a goal which will become achievable as clean vehicle technologies become more widely available (encouraged by Mayoral policies).

We would like to see a clear expectation for when compliance with air pollution limit values will be achieved (which in our view should be as soon as possible and by 2020 at the latest). We would also like to see clarity over how this compliance will be achieved. Your predecessor as Mayor published the Transport Emissions Road Map (TERM), which contained certain measures (expanding the ULEZ London-wide for all vehicles by 2025 and making central London zero-emission only for cars, as well as driving uptake of low-emission vehicles, transforming the bus fleet, a step change in behavioral attitudes to pollution and reworking the way road use is priced and regulated) that he said would be enough to achieve pollution limit value compliance by 2025.

Your recent announcements on tackling air pollution develop some of these approaches but, since you have said that compliance can be achieved well ahead of 2025, we would welcome your views on your predecessor's (or other) more ambitious measures such as a diesel ban or the zero-emission standard in central London, when you envisage London implementing them, and when and how you envisage London complying with legal air pollution limits (including PM<sub>2.5</sub> as well as NO<sub>2</sub>).

This Committee has previously recommended that the level of the ULEZ charge be escalated over time to provide a stronger incentive. Options for implementing this could include at a post-2020 date, in the central zone only, or as part of a three-tier system in the central zone (with the highest charge on vehicles not meeting the initial ULEZ standard, a lesser charge on other combustion-powered vehicles, and a zero charge for zero emission vehicles).

We would like to see proposals developed for a more comprehensive system of emissions charging at a more local, perhaps street-by-street level. This could strengthen incentives by potentially replacing some or all of Vehicle Excise Duty (VED) and Fuel Duty, and tackle pollution hotspots and areas of high exposure in a highly targeted way, including those in outer London.

We would support your and London boroughs' call for the devolution to London of VED. From 2017, low (but not zero) emission vehicles will no longer be incentivised by VED banding. Also, from 2020, VED is to be spent on the national strategic road network, which would be likely to see an imbalance between the proportion of VED raised from London and the proportion spent in

London. Devolution could allow the revenue to be spent on London's transport infrastructure and could facilitate the revenue being raised in a way that supports London's work on air pollution.

More widely, we heard at our meeting of calls for a new Clean Air Act, ensuring that all the current standards and responsibilities on air pollution are clearly embodied in UK law, and potentially improved on in some respects. There seemed to be agreement on this issue at the meeting and we would welcome the opportunity to work with you to promote this idea.

### **Traffic reduction**

Running through your transport emissions work should be a priority on traffic reduction, with complementary measures to enable modal shifts to buses, trains, walking and cycling. The experience of reducing car journeys between 1991 and 2011, and during the 2012 London Olympics, show how Londoners can adapt their travel behaviours. Less traffic on the roads can reduce congestion, improve journey time and reliability including for buses, and further encourage sustainable travel choices.

### **Other issues**

We would like you to give attention to other air pollution issues, including emissions from private hire vehicles, river transport, and non-transport sources such as waste-to-energy incinerators.

Thank you once again for the opportunity to give the Committee's views on these issues. I look forward to receiving your answers to the points raised and to continuing to engage with your efforts to tackle air pollution for Londoners.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Leonie Cooper', written in a cursive style.

**Leonie Cooper AM**

Chair of the Environment Committee

### **Appendix – view of the GLA Conservative Group**

The GLA Conservatives, whilst we welcome the Mayor's attention to this issue, are unable to support this response. We are particularly concerned about the impact of the Mayor's proposals to widen the ULEZ beyond the Congestion Charge Zone and bring forward its start date to 2019. We do not feel that there would be sufficient benefit, in going beyond the original ULEZ proposals, to justify the additional restrictions and costs to vehicle owners – especially residents and small businesses – or the impact on London's economy that these measures are likely to bring. Likewise, we are highly sceptical that the proposed 'T-Charge', on petrol and diesel vehicles in central London, will make any meaningful impact on London's air quality, despite imposing a punitive charge on London drivers.

Crucially, we note from evidence given at the recent Environment Committee meeting, that these measures were announced before any assessment had been made regarding their actual air quality and health benefits, or their impact on London's economy. This is disappointing, because it suggests that these measures are guided primarily by political or superficial considerations rather than hard evidence.

With this in mind, we would therefore request that our opposition to this Committee response be noted, as well as our opposition to the Mayor's proposals for a 'T-Charge' and expanded ULEZ. For clarity, we continue to strongly support the original ULEZ scheme in central London, as a targeted and effective way of tackling London's worst polluted areas.