

# Caroline Pidgeon MBE AM

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## **Sadiq Khan**

Mayor of London  
City Hall  
The Queen's Walk  
London SE1 2AA

**29 July 2016**

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

Dear Sadiq

## **Consultation on proposals to improve air quality in London**

I welcome the opportunity to respond to your latest consultation on proposals to improve air quality in the capital. As a London-wide representative I have been raising the issue of air pollution for several years and was pleased to learn of the importance you also attach to cleaning London's dirty air.

I strongly support your proposal to bring forward the implementation date of the central London Ultra Low Emission Zone (ULEZ), and separately to expand the zone to cover the North and South Circular Roads in 2020.

Alongside these measures I believe it will be necessary to consider stricter emissions standards and stronger incentives to encourage drivers to switch to cleaner vehicles. In addition, I believe the Mayor, through Transport for London (TfL), should consider procuring a fleet of zero emission capable taxis and leasing/selling them to taxi drivers and garages to accelerate the uptake of these vehicles.

I understand that further more detailed consultation will take place on specific measures later this year. In the meantime this response focuses on the steps that I believe must be adopted if London is to achieve full compliance with legal air pollution limits in the shortest time possible.

## **The case for intervention**

While air pollution in London may appear less visible today than it was 50 years ago, its effects are no less harmful, with the equivalent of 9,416 Londoners dying early every year due to air pollution in the capital - making air pollution the second biggest public health risk facing Londoners after smoking.

Meanwhile the European Commission has commenced the first stage of a legal process against the UK government for failing to meet air pollution limits. This in turn raises the prospect of substantial fines (of c.£300 million) being passed down to the GLA under the terms of the Localism Act (2011).

For all these reasons it is vital that both the Mayor and TfL have an effective plan to reduce air pollution across the city which meets legal limits within the shortest possible period.

## **Emissions Surcharge (T-Charge)**

I fully support the principle of introducing a new Emissions Surcharge (or so-called T-charge) in advance of the implementation of the ULEZ to discourage the oldest vehicles from driving in central London.

Liberal Democrats on the London Assembly have long called for a modest non-compliance charge to be introduced as soon as possible. The sooner this charge is introduced, the sooner it will influence purchasing choice and driver behaviour.

I note that the infrastructure required for enforcing the new T-charge is already in place, and the principle of differentially charging vehicles based on their tailpipe emissions is well established through the Ultra Low Emission Discount (ULED) currently applied to the Congestion Charge. **I would therefore urge you to consider introducing a £5 T-charge from late 2016, increasing to £10 from late 2017. Thereafter the charge should be subject to regular review to maintain the scheme's overall effectiveness.**

Whatever the date of implementation, it will be important that the T-charge applies 24 hours a day, 7 days a week – reflecting the fact that vehicle emissions contribute to poor air quality regardless of the time of day a vehicle is driven.

## **Emissions Standards**

Emission standards set for different vehicle types must take account of the growing availability of suitable vehicles on the market and the potential to drive further reductions in emissions.

**I do not believe the emissions standards currently proposed for the T-charge are sufficiently ambitious.** The current proposal to have the same exemption standard for both petrol and diesel vehicles (pre-Euro 4) ignores the differing level of pollutants emitted by these different fuel types and represents a missed opportunity to further reduce harmful emissions.

Already the vast majority of cars entering central London (79 per cent) meet this standard with less than a quarter (21 per cent) falling below the Euro 4 standard. This suggests there is scope for strengthening the emissions standard to accelerate the uptake of lower emission vehicles, at the very least by raising the exemption standard for diesel vehicles to Euro 5 and above. This is both closer to future ULEZ standards for diesel vehicles (Euro 6) and would provide a greater reduction in emissions.

Furthermore non-compliant vehicles would not become unusable on the date of implementation, but would simply be required to pay an emissions surcharge. Since many of these vehicles only make occasional trips into central London, it is unlikely that a pre-Euro 5 exemption for diesel vehicles would have a significantly greater impact on the overall cost of compliance for drivers.

Ultimately the financial costs to vehicle owners of complying with ULEZ standards and T-charge requirements must be weighed against the significant (and growing) health costs of air pollution to all those who live, work and visit our city. The current estimated costs of this health impact range from £1.4 billion to £3.7 billion. This alone demands that additional measures to improve air quality in London are introduced urgently.

## Coverage

I welcome the proposal to introduce the central London ULEZ in 2019 (one year earlier than currently planned), and separately to extend the ULEZ beyond central London from 2020: for motorcycles, cars and vans, to the North and South Circular; and for lorries, buses and coaches London-wide.

While the North and South Circular Roads provide a well-understood boundary for drivers and a practical one for the purposes of enforcement, it will be important to take account of nearby sensitive locations such as schools, hospitals and care homes and the desire of some boroughs to include more of their area in the zone. The detailed consultation on the precise boundary lines should therefore include options for including pollution hotspots adjacent to the North and South Circular Roads (e.g. Charlie Brown's Roundabout in the London Borough of Redbridge).

It will be necessary to consider air quality across the whole of London too. As you will know there are many parts of outer London – including Heathrow, Putney High Street and Kingston Town Centre – which routinely exceed legal limits for nitrogen dioxide (NO<sub>2</sub>). The absence of any measures to tackle air pollution from cars and vans in the vicinity of Heathrow is particularly worrying given the scale and magnitude of the exceedance of legal limits in this area.

It will be particularly important that poor air quality in these areas is not exacerbated as a result of older more polluting vehicles being displaced from central and inner London. **I would therefore encourage the Mayor and TfL to work with the relevant boroughs, key representatives and Heathrow Airport Ltd to monitor the effects of the ULEZ, particularly in those areas adjacent to the zone, and to reduce vehicles emissions in known air pollution hotspots beyond the North and South Circular Roads.**

## Beyond 2020

As low emission vehicle technology and markets develop it will be important to consider introducing more stringent requirements for the ULEZ as well as expanding the zone, for example by setting a Euro 6/VI standard for all vehicles entering the wider Low Emission Zone (LEZ) which covers most of Greater London.

**Certainly by 2023 a stronger set of standards for central and inner London should be considered to achieve further emissions reductions, ideally restricting the Congestion Charge Zone (CCZ) only to those vehicles that have zero or near-zero tailpipe emissions.**

This stronger requirement would position London firmly as a leader in the field whilst also supporting the growing 'zero emission' vehicle sector in the UK.

As you may know, when your predecessor first announced plans for an Ultra Low Emission Zone in central London, his instructions were clear in asking TfL to look at introducing a scheme that would ensure "all vehicles driving in the centre of the capital during working hours would be zero or low emission." The intention was again stated in his *2020 Vision*:

*So we have brought in a highly aggressive programme of improvements, including an Ultra Low Emission Zone by 2020. Our intention is to serve due notice to consumers and manufacturers that by this time we expect to restrict central London only to those vehicles that have zero or near-zero tailpipe emissions.*

Any move to adopt a lower standard risks putting London years behind the best practice of other major cities. I understand that Berlin is currently considering tightening its existing low emission zone, while Austria is already implementing its first Euro 6-based low emission zone. Meanwhile the Mayor of Paris has announced radical plans to ban diesel cars from the French capital by 2020.

Advances in technology and emissions sensing equipment also offer the opportunity to develop a more comprehensive system of emissions charging, with charges based on real world emissions.

As you may know the 'emission detection and reporting device' (EDAR) system has recently been trialled in Birmingham and London (at Marylebone Road and Blackheath). This laser-based system can detect the presence, relative concentrations, and quantities of specific gaseous compounds in the plume of exhaust from a moving vehicle. The system also records the temperature of the exhaust plume, as well as the vehicle's speed and acceleration as it passes under the remote sensing device.

It is clear that this technology could have a number of practical applications in London, for example ensuring that only truly low-emission vehicles are allowed to enter the ULEZ and other planned clean air neighbourhoods in addition to identifying cars that have had their diesel particulate filters illegally removed.

### **Workplace Parking Levy**

**As part of any package of additional measures aimed at achieving compliance with legal limits in the shortest time possible, I believe a Workplace Parking Levy (WPL) must be considered.** As well as tackling congestion across London, a WPL would deliver dramatic improvements in air quality as well as accelerating the uptake of zero and low emission vehicles.

I understand that Section 296 of the Greater London Authority Act (1999) already provides the legal basis for introducing such a scheme. **It would seem sensible therefore to include emissions-based parking charges and preferential parking for low emissions vehicles as part of the proposal for strengthening the central London ULEZ.**

### **Diesel Scrappage Scheme**

I fully support plans to develop a detailed proposal for a national diesel scrappage.

The failure of vehicle manufacturers to deliver the emission reductions expected from modern diesel vehicles, combined with government policies aimed at encouraging more efficient vehicles which have indirectly incentivised the uptake of diesel, has left a generation of dirty vehicles on our roads.

It is now clear that diesel is responsible for much of the current air pollution crisis in London. There is a growing recognition too that only by moving away from diesel in the long-run can the situation be improved.

However it will be important that existing diesel drivers, who bought their vehicles in good faith, are not penalised financially for having followed previous government advice. **A national diesel scrappage scheme – which would provide grants to take older diesel cars and vans off the road and replace them with lower emission vehicles – is needed urgently. The government should also make immediate changes to Vehicle Excise Duty (VED), Company Car Tax and other allowances to reflect the higher NOx emissions associated with diesels – removing the current incentive to buy diesel vehicles.**

Wider reforms to VED – including devolving revenue to London government – could also provide a powerful new tool to improve air quality by encouraging Londoners to buy cleaner vehicles.

## **Taxis**

I strongly support the current plans to require all new taxis presented for licensing in London to be zero emission capable from 01 January 2018. It has long been acknowledged that taxis account for a disproportionate level of pollution in central London, due in large part to their high mileage and concentrated geographical operation. To that end I believe changes to the licensing regime for taxis will deliver a measurable benefit to the health and quality of life of both Londoners and taxi drivers alike. However a ten-year fleet switchover period, from 2018, is too long a wait for London to have a clean fleet of taxis and TfL needs to develop a bold plan to accelerate this process significantly.

At the same time I recognise that most taxi drivers are sole traders whose livelihood depends on the reliability of their vehicle. Within this context it is neither fair nor feasible to expect taxi drivers to implement this reform without sufficient financial support.

Both the Mayor and TfL have assured critics that a number of manufacturers are in the advanced stages of developing range extended hybrid and battery electric taxis for sale in London. As yet, however, none of these vehicles are available on the market, nor is there any sign of the rapid charging infrastructure required to operate electric taxis effectively (of the 1,400 charge points currently in the Source London network, less than 10 per cent (129 charge points) are capable of providing a rapid charge).

**Given the current lack of availability of zero emission taxis and the current barriers to widespread adoption, I believe the time has come for TfL to intervene in this market directly by procuring a fleet of zero emission capable taxis and leasing or selling them to taxi drivers and garages, in much the same way as it has already done with the new Routemaster buses** (i.e. by purchasing them directly and leasing them to bus operating companies).

This would enable the taxi fleet to be replaced far more rapidly than by expecting drivers to buy vehicles individually and would give certainty to the taxi manufacturers. Naturally this would involve a change to the current model of taxi ownership in London, under which TfL's role has been limited to licensing the service. However, it is by far the fastest and most direct way of raising the environmental performance of London's taxi fleet.

Such a scheme would also dramatically raise the profile of new, cleaner technologies and could in turn encourage some passengers to upgrade their own cars, thereby supporting the Mayor's aim to achieve a step-change in the uptake of electric vehicles in London.

## **Promoting Awareness**

Londoners also deserve to be informed about the level of air pollution in their area, the risks posed, and the actions they can take to reduce their personal exposure to harmful pollutants during high pollution episodes. Promoting air quality awareness among Londoners should therefore form part of any package of measures to tackle air pollution in London.

While the airTEXT service continues to provide valuable alerts for some vulnerable Londoners during moderate and high pollution episodes, only around 10,000 individuals regularly receive these messages – well below the aspiration of signing up 250,000 individuals that was set by your predecessor.

A recent survey of London's most polluted schools, carried out by Liberal Democrats on the London Assembly, also found that just 2 per cent of schools were aware of the airTEXT service, with only 5 per cent aware of the *Cleaner Air 4 Schools* initiative.

Given that children are among those most likely to suffer from the health impacts of air pollution, it is a matter of some concern that so few schools are aware of the quality of the air around their premises or the simple actions they can take to reduce their exposure to dangerous pollutants. **I would urge you to consider launching a new air quality awareness campaign among all London's schools involving students, teachers, parents and governors.**

Meanwhile the TfL website receives around 20 million visits each month and provides an ideal platform through which to raise awareness about air pollution, provide specific information during high pollution episodes and encourage behaviour change to reduce public exposure to local emissions. **I would ask you to examine whether air quality information and health advice could be provided on TfL's website during high pollution episodes in London.**

Overall I support the introduction of a T-charge and plans to bring forward the implementation date of the central London Ultra Low Emission Zone. However, it is clear that further and stronger measures are required if London is to meet health-based legal limits for air pollution. For as long as the lives of ordinary Londoners continue to be affected by the issue, tackling air pollution must remain among London's top political and environmental priorities.

I trust you will take the measures and suggestions listed above into consideration before finalising your proposals for tackling air pollution in London.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Caroline Pidgeon', with a stylized flourish at the end.

**Caroline Pidgeon MBE AM**

Liberal Democrat Member of the London Assembly