

**Chairman of the Port Health and Environmental Services
Committee**
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Air Quality Plans
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Dear Sirs

Consultation response - Draft Air Quality Plans

Thank you for the opportunity to comment on the Draft Air Quality Plans (DAQPs) to improve air quality in the UK.

Summary

It is clear from the DAQPs that the government is pushing responsibility for improving air quality down to local government level. Whilst local government is in a good position to improve air quality in isolated hot spot areas through focused local intervention, national support is still required in order for local interventions to be effective. In particular, local government needs to be confident that the Euro Standard limits for NO_x are met when vehicles drive in urban areas. For the City of London, levels of air pollution are such that local action would not be sufficient to ensure that air quality limit values for nitrogen dioxide are met in a reasonable time frame. Coordinated local regional and national action is required.

The principal proposal in the DAQPs is the provision for a national framework of Clean Air Zones. Whilst this approach is welcome, it will not assist with levels of air pollution within the City of London as the Mayor of London already plans to introduce an ultra-low emission zone (ULEZ) in 2020. The ULEZ has the same emission standards as the proposed Clean Air Zones and will cover the City of London. Even with the ULEZ it is anticipated that the nitrogen dioxide limit values will not be met in central London until 2025 at the earliest.

This letter contains comments on the overview document and the specific plan for Greater London. It also contains a list of recommendations that we would like the government to consider for inclusion in the final plan. Finally, brief answers have been provided for the six consultation questions.

UK Overview document

It appears from the DAQPs that an opportunity has been missed to improve air quality to a level that is considered acceptable to health and meets the annual average and hourly average nitrogen dioxide (NO₂) limit values in the shortest possible time. The most recent health analysis of the impact of NO₂ on mortality in London¹ emphasises the need for bold action to deal with existing levels of pollution. The lack of detailed evidence underlying the DAQPs, and the on-going uncertainties with emissions from diesel vehicles, has made it difficult to assess the impact of the proposed measures within the DAQPs.

The DAQPs set out action that is planned, being implemented and already being taken at local, regional and national level to meet the annual and hourly EU nitrogen dioxide (NO₂) limit values. However, the plans do not appear to include any additional government action over measures already in place.

The UK Overview Document includes a revised projection for compliance with the NO₂ limit values with just 8 zones across the UK expected to be non-compliant by 2020, rather than 28 as previously thought. This is primarily due to updated vehicle emission factors that have revealed enhanced performance of Euro 5/V and Euro 6/VI vehicles. However, this prediction is based on limited data, as only a small number of Euro 6/VI vehicles had been tested at the time of the analysis. The documents acknowledge this, and highlight the corresponding uncertainty in both projections and the likelihood of measures based on Euro 6/VI to deliver sufficient improvement. Unfortunately no information has been provided on the extent of this uncertainty, or what the alternative plan would be if Euro 6/VI is not as effective as anticipated.

Paragraph 27, of the UK Overview Document, states that national action is being taken in order to deliver effective Euro Standards. Unfortunately, the document does not explain what this is. This is crucial if the main thrust of the plan is to encourage local authorities to set up emission based Clean Air Zones in order to achieve compliance.

The DAQPs state that the most significant action to benefit air quality in the longer term is electrification of the vehicle fleet, alongside other ultra-low emission technologies paragraph 35. When considering charging infrastructure for electric vehicles, great care must be taken to ensure that electricity generation in urban areas does not itself add to local levels of air pollution. It is apparent that the grid is already approaching capacity and companies with standby generators are being asked to run them for 'short term operating reserve' so the building does not have to draw power from the national grid. These generators run on diesel and are likely to have high emissions of both NO_x and PM₁₀. The Clean Air Act 1993 does not enable local authorities to control emissions from these devices, or set a minimum stack height to aid dispersion of pollutants.

The DAQPs propose a national framework of new Clean Air Zones that local authorities could implement. It proposes a system based on emission limits rather than Euro

¹ Understanding the health impacts of air pollution in London, Kings College London, July 2015
https://www.london.gov.uk/sites/default/files/HIAinLondon_KingsReport_14072015_final_0.pdf

Standards. This approach has the potential to cause confusion for the public in trying to establish if their vehicle complies. For consistency with existing air quality control areas, it would be beneficial to call the control areas Low Emission Zones. For these zones to be effective, it is essential that there is a mechanism in place to ensure that vehicles do actually meet these emission limits when driving in urban areas. This detail is lacking from the DAQPs.

There is no suggestion of financial support for authorities that wish to implement Clean Air Zones. In a time when local government funding is under great pressure national financial support to implement the Clean Air Zones should be considered. The total annual air quality grant has been reduced to £500,000 between all authorities that have declared Air Quality Management Areas this is not sufficient to support the implementation of Clean Air Zones.

Greater London Urban Area Plan

The DAQPs predict that the nitrogen dioxide limit values will not be met in London until 2025, and this is with the equivalent of a proposed Clean Air Zone which is the planned Ultra Low Emission Zone. This is 10 years away. The City Corporation does not consider this to be the shortest possible time. There is also a great deal of uncertainty around this date given the uncertainties around emissions from Euro 6/VI vehicles.

Paragraph 90 suggests that all taxis will be required to operate in 'zero emission mode' from 2020 whilst driving in the planned Ultra Low Emission Zone (ULEZ). This is very unlikely given the current market availability of zero emission capable vehicles and the anticipated roll out of these vehicles.

Diesel vehicles will need to meet Euro 6/VI standard, or pay a charge to enter the ULEZ. However, there is no guarantee given of how these vehicles will perform when driving in central London and what the actual NO_x and NO₂ emission rate will be.

Recommendations

The City Corporation would like the following points to be considered for inclusion in the final plan:

- A commitment to ensure that emissions from vehicles on the road in the UK comply fully with Euro Standards. This is particularly important if local authorities are expected to implement Clean Air Zones based on emission standards. This needs to be done at a national level and not by individual local authorities.
- The proposal for an effective vehicle emission testing regime to ensure on-going compliance with Euro Standards, for example NO_x and PM₁₀ emission checks incorporated into the annual MOT.
- An explanation of the national action being taken to deliver effective Euro Standards.

- A commitment to push for European wide NO₂ emission limits, in addition to NO_x limits, which will help to deal with the increasing levels of direct NO₂ from vehicle exhausts, and corresponding high roadside levels of NO₂.
- A commitment to work with the European Commission to ensure that 'vehicle emission test fixing' is not able to occur going forwards.
- A parallel plan to meet the limit values should Euro 6/VI not deliver the anticipated emission reduction.
- The centre of London will be in the equivalent of a Clean Air Zone by 2020 with the introduction of the ULEZ, yet the nitrogen dioxide concentrations will not meet the limit values until 2025. Details are required of the additional action planned for central London to ensure an earlier compliance date.
- A commitment to provide financial support to local authorities who wish to implement Clean Air Zones.
- Further fiscal incentives to encourage and promote the cleanest vehicles. This should take into account both carbon and air pollutant emission standards e.g. through Vehicle Excise Duty.
- Financial support to enable London's buses and taxis to be zero emission capable as soon as possible. This should include a taxi scrappage scheme. A commitment to support the London Councils / Greater London Authority 'Go Ultra Low City Schemes' bid to support the roll out of ultra-low emission vehicles would be welcome.
- A proposal to update the Clean Air Act 1993 as soon as possible to provide effective powers to deal with emissions from all combustion plant.
- Financial support for useful, tailored research and technology e.g. how new technology such as satellite navigation could be used to encourage drivers in hybrid vehicles to switch to electric mode when driving in pollution hotspot areas.
- A commitment to roll out alternative fuel infrastructure to support zero emission vehicles. Serious consideration must be given to how the electricity will be generated in urban areas in order to power rapid electric charge points.
- A commitment to harmonise all future carbon and air quality policies so fuel such as diesel isn't encouraged going forwards.
- A national scheme to raise awareness of air pollution so the public can take steps to minimise their personal exposure until the limit values are met in full.
- An assessment of key government policies that could be used to support improvements in air quality and reduced public exposure.

Consultation Questions

Question 1: *Do you consider that the proposed plan set out in the overview document strikes the right balance between national and local roles?*

No, the plan does not include any additional action by national government. There is no indication of how the government will support local authorities to implement Clean Air Zones.

Question 2: *Are you aware of any other action happening in your area which will improve air quality and should be included in the plan? If yes, please identify as far as you are able:*

- *a. What the additional actions are;*
- *b. The zone(s) in which they are being taken; and*
- *c. What the impact of those actions might be (quantified impacts would be particularly useful).*

Since the information was provided for the draft air quality plans, the City of London Corporation has published an updated Air Quality Strategy, 2015 – 2020. The strategy can be found at www.cityoflondon.gov.uk/air

The City Corporation will be investigating options to establish a Low Emission Neighbourhood in the Square Mile and investigating additional options to reduce emissions from diesel vehicles across its entire area. Neither piece of work has commenced so there is no information to date on what the impact on local air quality may be.

Question 3: *Within the zone plans there are a number of measures where we are unable to quantify the impact. They are included in the tables of measures. Do you have any evidence for the impact of these types of measures?*

It is very difficult to quantify the impact of individual action on concentrations of air pollution in the centre of London due to the high levels of background pollution.

Question 4: *Do you agree that a consistent framework for Clean Air Zones, outlined in section 4.3.6 of the UK overview document, is necessary? If so, do you think the criteria set out are appropriate?*

Yes a consistent framework is necessary. It should be based on, or at least linked to, Euro Standards rather than emission limits as it is easier for the public to understand. The zones should be called Low Emission Zones for consistency.

Question 5: *What do you consider to be the barriers that need to be overcome for local authorities to take up the measures set out in section 4 of the UK overview document? How might these be overcome? Are there alternative measures which avoid these barriers?*

Local authorities will require financial support from the government. They will also need to be confident that prescribed vehicle emission limits (i.e. Euro Standards) will be met. Local authorities will not want to implement policies to restrict certain vehicle types if it will make no difference to local levels of pollution.

Question 6: *Are you aware of any additional action on non-transport sources to improve air quality that should be included in the plans?*

Emissions from the increasing number of electricity generating plant in urban areas needs to be addressed.

Yours faithfully

A handwritten signature in black ink that reads "Wendy Mead". The signature is written in a cursive, flowing style.

Wendy Mead OBE
Chairman of the Port Health and Environmental Services Committee