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## **Rt Hon Owen Paterson MP**

Secretary of State  
Department for Environment, Food and Rural Affairs  
Nobel House  
17 Smith Square  
London SW1P 3JR

Date: 01 AUG 2013

Dear Owen

### **Working together to improve air quality in London**

We are writing together as the Mayor of London and the Chair of London Councils' Transport and Environment Committee (which represents the 32 London boroughs and the City of London) to request the Government take additional steps to help us deliver further improvements to air quality in London. This letter represents an emerging consensus about the need for further targeted action in London to meet EU limit values for nitrogen dioxide (NO<sub>2</sub>), and to continue to reduce levels of particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), to protect human health and to support economic growth by securing London's reputation as an attractive city for investment.

As you know, improving air quality is a shared priority with the tools and resources needed to take action distributed between the European Commission, Government, the Greater London Authority and local authorities. While our motivation is to improve air quality to protect human health, clearly we must also be mindful of the potential reputational, legal and financial impacts of being infringed for breaches of the NO<sub>2</sub> limit values. These are shared risks which will impact Government, the Greater London Authority and the London boroughs so it is important that we work together to deliver further measures to reassure the Commission about our commitment to achieving EU limit values for NO<sub>2</sub> as quickly as possible.

Already, the GLA and Transport for London (TfL) have delivered a significant package of measures including the Low Emission Zone (LEZ), energy efficiency programmes such as RE:FIT and RE:NEW, taxi and private hire age and emission limits and delivering Europe's largest fleet of hybrid buses. Recently an even more ambitious programme has been announced, including establishing a Central London Ultra Low Emission Zone by 2020. The London boroughs, meanwhile, have been hotbeds of innovation working together to develop airTEXT, promoting business engagement, installing infrastructure for low emission transport including to deliver a network of electric vehicle charging points, improving the energy efficiency of housing stock and building air quality into the planning system to deliver long-term emissions savings.

While we recognise and appreciate the support provided by Government to date, we all have to commit to taking more action if the needed improvements in air quality are to be achieved. By 2015, half of the UK roads exceeding the EU limit values for NO<sub>2</sub> will be located in London. It is right, therefore, that additional resources are focused here to help us address this significant issue. Government, in particular, has a critical role to play in London to deliver further action. Specifically, we would like the Government to commit to the following:

- **Clean Air Act**

Defra is currently reviewing the Clean Air Act. This suite of legislation has delivered significant improvements in air quality over the past sixty years and now needs to be updated to make it fit for purpose. Amongst other issues, the right approach is needed to enable local authorities to properly manage emissions from non-road mobile machinery and generators, biomass, liquid biofuels and combined heat and power systems. Existing powers relating to smoke control orders should also be retained.

- **Defra Air Quality Grants Programme**

The Defra Air Quality Grants Programme has supported local authority activity to tackle local air quality hotspots, to support monitoring and to undertake research into local sources. While recognising that Defra is under pressure to deliver cost savings, it is essential that Defra continues prioritising funding for this programme reflecting the legal, economic and human impacts of air pollution. Long term certainty about this funding stream should be given to enable local authorities to plan ahead. Given the scale of the air quality challenge in London, a significant proportion of the available funding should be focused here. The GLA would match any Defra funding through the new Mayor's Air Quality Fund and would encourage boroughs to provide additional match-funding from available LIPs funding and other sources, considerably increasing the impact of Defra's investment.

- **Enhanced coordination within and across levels of Government including Local Air Quality Management (LAQM)**

With the tools and resources needed to tackle air quality distributed across different levels of Government (central, regional, local) and within multiple Government departments (Defra, DfT, DECC, DCLG etc), we look to Government to provide the necessary coordination to ensure appropriate action is taken at all levels. The Local Air Quality Management review provides a unique opportunity to address these issues and put in place improved coordination mechanisms (e.g. on planning policy) and greater central Government support. For the LAQM review itself, it is vital that Air Quality Management Areas and borough reporting and assessment responsibilities are retained, reflecting the unique air quality challenges the Capital faces.

- **Encourage the early uptake of low emission and Euro VI vehicles**

We are all aware of the challenges presented by the failure of Euro standards to deliver the expected reductions in NO<sub>x</sub> emissions and their impact on the total proportion of NO<sub>2</sub> emissions. The Government has a crucial role to play in encouraging the uptake of Euro VI vehicles, including through the use of enhanced Reduced Pollution Certificates, the HGV Road User Levy Scheme and capital allowances to off-set investment in Euro VI. Consideration should also be given to how the emerging practice of removing diesel particulate filters pre-installed on vehicles to "improve" engine performance can be tackled.

- **Tackle dieselisation of the car fleet by amending tax incentives (including VED and capital allowances)**  
 In recognition of the significantly higher levels of air pollution caused by diesel cars, a revision of the incentives structure is needed to take into account air pollutants as well as carbon dioxide while continuing to support the uptake of new low emission vehicles. Any changes to the tax regime should be tax neutral overall.
- **Include improved vehicle air quality information in the DVLA database**  
 Currently TfL has to absorb the cost to establish bespoke databases for the information required to enforce the LEZ scheme; this is a major disincentive to other authorities to introducing their own scheme.
- **Developing enhanced retrofit standards and a supporting testing regime**  
 DfT should support the development and adoption of the proposed new UN Economic Commission for Europe retrofit standard. This would be an effective alternative to a national certification and testing regimes which the GLA has previously lobbied for, enabling DfT to put in place an effective retrofit standard more cost effectively. An interim standard would enable schemes like the Low Emission Zone to be used to affordably clean up fleets while waiting for the widespread roll-out of Euro VI vehicles
- **Put in place mechanisms to stop removal of manufacturer-fitted pollution abatement systems**  
 There is increasing evidence that people are removing the pollution abatement systems installed by manufacturers, particularly diesel particulate filters, to reduce fuel consumption or increase speed/other aspects of performance. A number of websites advertise these services.
- **Support regulation for noise reduction in the freight fleet and delivery practices**  
 Changes enabling deliveries out of normal working hours would reduce daytime congestion and emissions. A large scale trial of some of the regulatory changes set out above was carried out over three months in the London borough of Wandsworth. The Freight Transport Association found that during the trial journey times, decibel levels, delivery costs and CO2 emissions were reduced. Assuming benefits from the Wandsworth trial would be broadly replicated at other sites, there would be considerable national benefit to these regulatory changes. London also had a largely positive experience of out of hours deliveries during the Olympic and Paralympic Games.
- **Bring penalty charges for engine idling into line with other traffic offences**  
 The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 Regulations should be amended so that penalty charges for idling offences are brought into line with parking penalty charges, to provide a stronger deterrent (a maximum of £130 in London rather than the current £20). TfL estimate that if all drivers in central London switch off engines for one minute each day instead of leaving them idling it could reduce emissions by 90kg per annum.

- **National emission standards or age limits for taxis**

In central London taxis account for around 20 per cent of PM<sub>10</sub> road transport emissions and 15 per cent of NOx road transport emissions. Taxis in other cities across the UK have similar disproportionate air quality impacts.

TfL has already taken action by retiring the oldest taxis over 15 years of age and requiring new taxis to meet a Euro V standard. However, more could be done in partnership with the taxi trade.

In 2010 the Government successfully delivered a vehicle scrappage scheme. A similar model could deliver significant emissions savings and support the introduction and development of the next generation of low and zero emission taxis.

- **Reducing emissions from airport operations, including at Heathrow**

We welcome the Government's commitment, set out in its Aviation Policy Framework, to ensuring full compliance with European air quality standards. We are also pleased that the air quality impacts, including impacts due to aircraft, airside operation and local surface transport links will be fully considered as part of the Davies Commission review.

- **Tyre and brake wear**

As exhaust emissions improve, the proportion of emissions from tyre and brake wear is expected to increase. Indeed, the latest London Atmospheric Emissions Inventory based on research by King's College London indicates that up to 75 per cent of road transport emissions of PM come from tyre and brake wear. To date limited action has been taken to address these sources and Government has a critical role to play in undertaking additional research to further understand this issue, and then putting in place appropriate steps to reduce this emissions source.

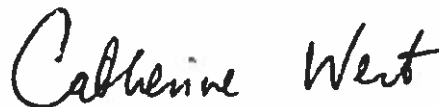
I hope you will appreciate that we are committed to taking the necessary steps to improve London's air quality. Your support in doing this is vital and we look forward to continue working with you over the coming months.

We have copied this letter to Rt Hon Patrick McLoughlin MP.

With best wishes,



**Boris Johnson**  
Mayor of London



**Cllr Catherine West**  
Chair of London Councils' Transport  
And Environment Committee

Cc: Rt Hon Patrick McLoughlin MP