

Mayor of London How can we clean up our air?

Background to CIWEM

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. The Institution provides independent comment on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

CIWEM welcomes the opportunity to respond to the Mayor of London's consultation on clean air. We are pleased that the Mayor has chosen air quality as a priority during his first weeks in office and would like to see the capital's air quality plans being as bold as possible. As stated in the consultation the equivalent of 9,416 Londoners die early every year due to air pollution. London needs to take the lead on tackling air pollution so other towns and cities can follow.

To read more about CIWEM's work in this area and our recommendations for policies and practical action in the UK please see our report *Clearing the Air*¹.

Summary

CIWEM welcomes bringing the implementation of the central London Ultra Low Emission Zone (ULEZ) forward by one year. However in its current form it will only apply to the Congestion Charge Zone which is only 7% of the Greater London area. It needs to be bigger, stronger and to be brought in sooner. All options for improving the ULEZ should be made on the best available evidence and robust modelling of measures designed to help London meet the legal limits in the shortest time possible.

We welcome an emissions surcharge for the most polluting vehicles entering central London. Progress should be monitored to see if this changes the number of high emitters entering central London.

The proposals are to charge rather than to ban diesels. In Berlin pre-Euro IV diesels were banned in 2010 unless they had a diesel particulate filter. Therefore the Mayor's proposals could be more ambitious.

A diesel scrappage scheme should certainly be considered. There should be some analysis undertaken to understand the carbon impact alongside the air pollution impact of such a change in policy. Encouraging the purchase of new cars should not really be encouraged so it needs to be taken forward with care.

¹ <http://ciwem.org/wp-content/uploads/2016/02/Clearing-the-Air.pdf>

Traffic reduction will also be needed alongside a modal shift as particulate pollution also arises from break and tyre wear. Other cities have targets which could be considered for London.

Charges from the ULEZ should be reinvested into modal shift measures.

Small scale combustion plant (e.g. domestic boilers) can have a significant impact on local air quality and their lack of regulation should be addressed.

Response to the survey questions

CIWEM has responded to these where appropriate to do so.

1. Thinking about air quality, how much of a problem, if at all, do you think the cleanliness of the air is in each of the following locations? Please indicate on a scale of 1 to 5, where 1 is no problem at all and 5 is a very big problem. *This question is required.

	1 - No problem at all	2	3	4	5 - Very big problem
London as a whole	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Central London	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
My local town centre / high street	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
My neighbourhood	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

2. To what extent do you think each of following is responsible for air pollution in London? *This question is required.

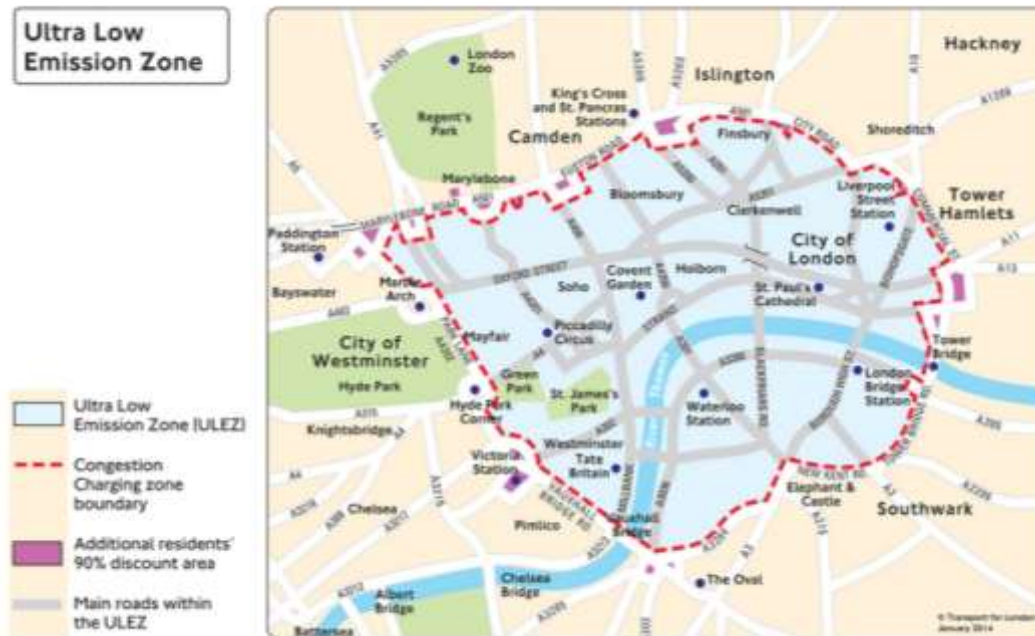
	A great deal	A little	Not at all	Don't know
Construction works (buildings, roads, rail etc)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Private cars (diesel)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Private cars (petrol)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lorries and vans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Buses	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coaches	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Vehicles idling / sitting in traffic congestion	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Home boilers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Business premises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The Ultra Low Emission Zone

The Ultra Low Emission Zone (ULEZ), set to be implemented in September 2020, is an area within which all cars, motorcycles, vans, minibuses, buses, coaches and heavy goods vehicles (HGVs) will need to meet exhaust emission standards (ULEZ standards) or pay a daily charge

to travel. This would operate in addition to the existing London-wide Low Emissions Zone for heavy polluting diesel vehicles (e.g. lorries, coaches, pick-ups), which has operated in London since 2008. New diesel cars bought since September 2015 are likely to already meet this standard, but older diesel cars are unlikely to.

The ULEZ is currently planned to cover the area of central London shown in blue in the map below, which is the same area as the Congestion Charge Zone.



3. Some people think that the implementation of the ULEZ should be brought forward to September 2019 in order to improve air quality sooner, while other people think that it will be too costly and problematic for drivers and businesses. To what extent do you agree or disagree that the 2020 ULEZ implementation date should be brought forward to September 2019?

- | | | | | | |
|----------------|----------------|----------------------------|-------------------|-------------------|------------|
| Strongly agree | Slightly agree | Neither agree nor disagree | Slightly disagree | Strongly disagree | Don't know |
| ✓ | | | | | |

4. Which of the following areas do you think should be covered by the ULEZ for light vehicles (e.g. cars, motorbikes and vans)?

- Current proposed ULEZ/Congestion Charging Zone – Yellow area
- Inner London (e.g. to the North and South Circular Roads) – Red area
- The existing London-wide Low Emission Zone (LEZ) for heavy vehicles (i.e. encompassing most of London) – Green area
- I don't think that there should be a ULEZ for light vehicles at all

5. Which of the following areas do you think should be covered by the ULEZ for heavy vehicles (e.g. lorries, buses and coaches)?

- Current proposed ULEZ/Congestion Charging Zone – Yellow area
- Inner London (e.g. to the North and South Circular Roads) – Red area
- The existing London-wide Low Emission Zone (LEZ) for heavy vehicles (i.e. encompassing most of London) – Green area
- I don't think that there should be a ULEZ for heavy vehicles at all



Diesel scrappage scheme

6. One of the ways the Government could help drivers switch from older, more polluting vehicles is to fund a scrappage scheme or a similar incentive scheme, which would pay vehicle owners (likely to be diesel) part of the cost of replacing their vehicle with a less polluting one.

To what extent do you agree or disagree that the government should fund a scrappage scheme to help people scrap their car or van and replace it for a cleaner equivalent?

- | | | | | | |
|-----------------------|----------------------------------|----------------------------|-----------------------|-----------------------|-----------------------|
| Strongly agree | Slightly agree | Neither agree nor disagree | Slightly disagree | Strongly disagree | Don't know |
| <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

The feasibility of this should certainly be investigated.

Vehicle Excise Duty

7. Vehicle Excise Duty is currently levied on vehicles in the UK, the level of which depends on engine size, fuel type and CO₂ (carbon dioxide) emissions. It is currently set and administered by national government. Funds generated are used to pay for the motorway and major road network outside of London. One option for addressing London's high emissions could be for the Mayor to be given greater control over setting Vehicle Excise Duty for London registered vehicles, to encourage the buying of cleaner vehicles in the city.

To what extent do you agree or disagree that London should be given greater control over Vehicle Excise Duty?

Strongly agree ✓	Slightly agree	Neither agree nor disagree	Slightly disagree	Strongly disagree	Don't know
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This could allow the Mayor to target the most polluting cars and phase out diesel vehicles and the money raised could help fund measures to reduce air pollution.

Pedestrianisation

8. Pedestrianisation involves closing streets to motorised through traffic including cars, buses and taxis. Traffic is rerouted either permanently or at certain times of the day or week. To what extent would you agree or disagree with the following statements:

	Strongly agree	Slightly agree	Neither agree nor disagree	Slightly disagree	Strongly disagree	Don't know
Oxford Street should be pedestrianised	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There should be more car-free days in other central London locations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We should have one car-free day in central London a year	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
My local town centre/high street should be pedestrianised at all times	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

There should be more car-free days in my local town centre/high street

Car free days should be considered whenever there is a smog event. Care must be taken not to displace pollution elsewhere.

High pollution alerts

9. Organisations such as the Met Office currently make forecasts on the level of air pollution. It has been suggested that alerts are provided when pollution is particularly high, to help raise awareness of the air pollution levels so that people can make decisions about where and how to travel around London to lessen their exposure to polluted air.

Would you like to receive information when air pollution is high, in order to take action that would protect your health?

- Yes
- No
- Don't know

In which of the following ways would you prefer to receive information? (choose all that apply)

- Pollution level alerts on electronic road signs
- Updates on social media (for example the Mayor's Twitter account, TfL accounts)
- Electronic noticeboards on the underground/bus network
- News channels
- Community noticeboards

Domestic boilers

10. Domestic boilers account for around 13% of NOx (nitrogen oxides) emissions in London. To address emissions caused by boilers, the Mayor could fund a boiler scrappage scheme whereby those homes with older, more polluting boilers would receive an incentive to upgrade to a cleaner model.

To what extent do you agree or disagree that the Mayor should fund a boiler scrappage scheme?

- | | | | | | |
|-------------------------------------|--------------------------|----------------------------|--------------------------|--------------------------|--------------------------|
| Strongly agree | Slightly agree | Neither agree nor disagree | Slightly disagree | Strongly disagree | Don't know |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Small scale combustion plant (e.g. domestic boilers) can have a significant impact on local air quality and their lack of regulation should be addressed.

Emissions Surcharge

11. Ahead of the implementation of the Ultra Low Emission Zone (ULEZ) in central London in 2020, the Mayor has proposed the introduction of an Emissions Surcharge, to be introduced in 2017. The Emissions Surcharge would be a daily charge that would reduce emissions by reducing the number of the oldest, most polluting, vehicles driving at peak times in the Congestion Charge Zone.

To what extent do you agree or disagree that a new Emissions Surcharge should be introduced to discourage the use of older, more polluting vehicles in central London?

Strongly agree	Slightly agree	Neither agree nor disagree	Slightly disagree	Strongly disagree	Don't know
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. It is suggested that the Emissions Surcharge would operate in the same zone and at the same times as the Congestion Charge (0700 – 1800, Monday to Friday). It would not operate outside these hours or on Saturdays, Sundays or public holidays.

Do you agree or disagree that the Emissions Surcharge should operate between 0700 – 1800, Monday to Friday?

- Yes, I agree
- No, the operational hours should be reduced
- No, the operational hours should be extended
- I don't think there should be an Emissions Surcharge at all
- Don't know

It should be extended if modelling suggests that it cannot be proven to meet legal air quality limits.

13. It is suggested the Emissions Surcharge would be based on 'Euro standards', which are also used for the ULEZ. These are European standards that define the limits for exhaust emissions for new vehicles sold in EU member states. Vehicle manufacturers may only sell new vehicles that comply with these standards from a certain date. The emission limits defined by the Euro standards or equivalent would apply.

It is suggested that the charge would affect only pre-Euro 4/IV vehicles (broadly speaking those vehicles first registered with the Driver and Vehicle Licensing Agency (DVLA) before January 2005). Cars, vans, minibuses, heavy goods vehicles, buses and coaches would need to meet the at least Euro 4/IV emission standard in order to

comply. This standard would apply to both petrol and diesel vehicles.

Do you agree that vehicles that do not meet at least the Euro 4/IV emissions standard should be required to pay the Emissions Surcharge?

- Yes, I agree
- Yes, but newer vehicles should also pay the charge
- No, older vehicles should not have to pay the charge
- Don't know

It is unclear why Euro IV has been chosen as Euro V and IV diesels have higher NOx than Euro III cars. Euro VI diesels also need to be able to demonstrate that their real world emissions are in line with test cycles.

14. It is suggested that vehicles that do not meet the standard would be required to pay a daily charge of £10. The Emissions Surcharge would be in addition to the Congestion Charge which is currently £11.50 (and any Low Emission Zone charges, if applicable).

Do you agree that the daily charge should be set at £10 to reduce the number of polluting vehicles travelling in central London?

- The £10 daily charge is right
- The daily charge should be lower than £10
- The daily charge should be higher than £10
- I do not support the introduction of a daily charge
- Don't know

15. It is suggested that the majority of exemptions and discounts that apply to the Congestion Charge would also apply to the Emissions Surcharge. Residents would only pay 10% of the daily Emissions Surcharge (if they did not meet the standards) and Congestion Charge. However, it is also suggested that vehicles with 9 or more seats including buses and coaches would be required to pay the Emissions Surcharge as they contribute pollutants in the same way as other large vehicles such as HGVs.

Do you think that residents should receive a 90% discount from the Emissions Surcharge?

- Yes, they should receive a 90% discount (to mirror the CC discount)
- No, they should pay the full charge
- No, they should have a 100% discount
- Don't know

A 50% discount may be more reasonable.

16. Do you agree or disagree that vehicles with nine or more seats such as buses and coaches should also pay the Emissions Surcharge?

Strongly
agree
✓

Slightly
agree

Neither agree nor
disagree

Slightly
disagree

Strongly
disagree

Don't
know