

**TRANSPORT FOR LONDON  
LONDON LOW EMISSION ZONE: PROPOSED REVISIONS TO THE TRANSPORT  
AND AIR QUALITY STRATEGIES**

**RESPONSE BY THE LONDON FORUM OF AMENITY AND CIVIC SOCIETIES**

The London Forum of Amenity and Civic Societies, formed in 1988, is an umbrella organisation for some 120 residents, conservation and civic societies, community organisations and other affiliated bodies with an aggregate membership of over 100,000. It also serves as the Civic Trust's regional federation for London.

We have examined the proposed Revisions to the Transport Strategy and the Air Quality Strategy designed to pave the way for introduction in 2008 of a Low Emission Zone covering the whole of London and wish to offer the following comments.

Although the gross form of pollution that gave rise to London smogs has been largely eliminated, it is common ground that London has the worst air pollution in the UK and some of the worst in Europe. It is a matter of great concern that this results in around a thousand early deaths in London each year, plus a similar number of hospital admissions.

London fails to meet European Union (EU) limit values for atmospheric concentrations of particulates (PM<sub>10</sub>) and nitrogen dioxide (NO<sub>2</sub>), and will fall short by an even bigger margin when more stringent standards for NO<sub>2</sub> take effect at the end of 2010. Because of London's poor air quality the UK has faced the prospect since 2004 that the European Court of Justice might impose large fines.

The statement in the draft Revisions that 'These [PM<sub>10</sub> emissions] are the emissions most harmful to human health' (4G.128/4C.3), and the figure of 53% for the proportion of those emissions that comes from sources other than road vehicles, have to be interpreted in the light of what is said subsequently about the harmfulness and sources of PM<sub>2.5</sub> (4G.134/4C.9). In any event the highest concentrations of both PM<sub>10</sub> and NO<sub>2</sub> recorded in London are in the vicinity of the main road network, and it is therefore logical that action to counter these forms of pollution should concentrate on emissions from road vehicles.

The main contribution to reducing air pollution in Europe will come from the progressively more stringent standards imposed by the EU on emissions from new vehicles ('Euro standards'). The proposed Low Emission Zone seeks to accelerate the impact of that policy by levying a charge on the use anywhere in London of commercial vehicles which do not meet current standards. This would create a financial incentive to operators to make improvements.

We agree the criterion applied to vehicles in the Low Emission Zone should be the Euro standards for emissions, because this will allow operators to achieve compliance by retrofitting pollution control equipment as well as by vehicle replacement (4G.175/4C.50).

The rejection of the alternative approach of giving operators grants of up to 30% of capital cost (the maximum permissible under EU rules), on the grounds that this is unlikely to be cost-effective and unlikely to provide adequate incentives to operators to clean up their vehicles (4G.150/4C.25), seems to raise a question about the effectiveness of what is actually being proposed. The key point presumably is that, as in the further alternative of a scrapping scheme, it would be difficult to target grants effectively on the large number of firms based outside London which operate vehicles within London, but to varying extents.

We note that substantial proportions of the emissions of PM<sub>10</sub> and NO<sub>x</sub> from road vehicles come from diesel-engined cars, but that it is considered impracticable to levy charges on cars in the Low Emission Zone (4G.167/4C.42).

The Low Emission Zone is the most important component in the Mayor's Strategy for improving air quality. It is a matter of regret, therefore, that things have not moved more rapidly since discussions began in 2001.

Although the Low Emission Zone will have a favourable impact on air quality, modelling indicates that the people removed from exposure to excessive concentrations of PM<sub>10</sub> and NO<sub>2</sub> as a result of its introduction will be far fewer in number than the people who will remain exposed to such concentrations.

We note it is hoped that, if the Low Emission Zone is put into effect and a further European Community (EC) Directive now in draft is adopted, the UK could escape infraction proceedings by the European Commission for London's poor air quality because it would be able to demonstrate that it had taken significant action to try to achieve the limit values (4G.134/4C.9). Even if this is the outcome, however, it will be scant comfort to the several hundred thousand Londoners whose health would remain at risk from excessive concentrations of pollutants. The goal posts might also change if a new EU standard is set for PM<sub>2.5</sub>, but the draft Revisions to the Strategies do not claim that the Low Emission Zone would be sufficient to meet a standard of that nature either.

The wording of the draft Revisions also implies that the proposed Low Emission Zone is not necessarily 'the most effective option' for making progress towards achieving either the 2010 objective for annual mean concentration of PM<sub>10</sub> or the 2010 objective for annual mean concentration of NO<sub>2</sub> (4G.135/4C.10). Clarification is needed on this point.

The London Forum urges that further investigations be carried out into more radical measures for bringing about more thoroughgoing improvements in London's air quality. These might take the form either of more stringent restrictions on older vehicles operating in London or more attractive incentives to acquire and use less polluting new vehicles.

It would be a great advantage if the measures taken can be designed in a way that will at the same time encourage a switch to smaller vehicles for making deliveries in the more congested areas of London.

While we wish to see a general move towards use of lighter vehicles in London, we do not oppose the suggestion that Low Emission Zone charges should also apply to LGVs more than ten years old (4G.170/4C.45). However, we note that this will be subject to the outcome of further investigations, and will not in any case apply before 2010 (4G.171/4C.46).

The proposals for operating a Low Emission Zone (4G.181-2/4C.56-7) are sensible in principle, but it is not possible to reach a final judgement on their practicability and acceptability without more detail on, for example, the amount of the charge that would be imposed, the number of vehicles that would be required to register, and how easily and clearly that category of vehicles can be defined.

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