

London Forum of Amenity and Civic Societies

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15 November 2016

**To: Consultations@tfl.gov.uk**

**From: London Forum of Amenity and Civic Societies:**

This is a response to TfL's consultation document dated 10 October 2016 on 'New proposals to improve air quality'. The London Forum is the umbrella group for over 130 amenity and civic societies in London.

### **Summary of Key Points**

- We welcome the Mayor's proposal to introduce an emissions surcharge in central London from October 2017. The judgment this autumn by the High Court in the ClientEarth case makes action on air pollution in London more urgent.
- We welcome the idea of extending the Ultra Low Emissions Zone outwards from central London, and believe that this should be done from 2019 rather than later. It is particularly important to use this means to deter the use of diesel cars and light vans that would not otherwise be affected outside central London.
- However we believe the boundaries need to be extended beyond the boundaries of the north and south circular roads to cover emissions hotspots further out.
- We also believe that there is a strong case for moving as quickly as reasonably practicable to charging all diesel cars and vans, including Euro 6 diesel vehicles, given that they too contribute substantially to the emissions problem.

- We welcome the idea of strengthening the London-wide Low Emission Zone so as to charge all heavy vehicles of less than Euro VI standards, and believe that this should be done from 2019 rather than later.
- We welcome the actions proposed on buses and taxis.
- We strongly support the Mayor's wish to have more responsibility for vehicle excise duty in London as a means of reducing emissions, but believe that he needs to spell out as soon as possible how he would use these powers, and what additional benefit they would provide to reducing emissions in London.
- We believe that the Mayor needs, as part of his strategy, actively to encourage boroughs to use differential parking charges more extensively to deter the use of more polluting vehicles.
- We are less persuaded of the case for a diesel scrappage scheme, as this would appear to reward users of more polluting vehicles at the expense of those who already have lower emitting vehicles.

## **Detail**

### **Emissions surcharge**

1. The recent High Court judgment against the Government in the ClientEarth case points to the need to take urgent action on air pollution.
2. We support the Mayor's proposal to introduce an emissions surcharge in central London from October 2017 on the basis set out in the consultation document. We welcome the fact that the system of charges is relatively straightforward, so as to make the scheme easily understandable. It is important to view this scheme as only a transitional approach, given the amount of air pollution beyond the area covered, which does not even include the inner ring road.

### **Extending the Ultra Low Emission Zone**

3. We believe such an extension is an essential further step, which should be implemented as soon as possible – in practice likely to be 2019 as being considered as one option by the Mayor. This is both because of the amount of pollution extending beyond central London. We regard it as important that initially such an extension covers diesel vehicles of a lower standard than Euro 6, given their contribution to air pollution.

4. However we believe that the boundaries of the extension should go further than the north and south circular roads. This particularly applies to the area immediately south of the South Circular Road, which is mostly significantly closer to central London than is the North Circular Road. In addition, key areas with currently high levels of air pollution, especially that around Heathrow airport, need to be covered by the ULEZ, whether or not there is an eventual third runway at Heathrow.
5. We also believe that the scheme needs to move as quickly as practicable to providing a level of deterrent to diesel cars and vans meeting the current Euro 6 standard, given that these vehicles also contribute significantly to air pollution. The High Court judgment in the ClientEarth case pointed to this contribution, stressing the much more limited improvement to air quality that these vehicles are making made than was originally expected, given the divergence between the standard as set out in legislation and the real-world effects.

### **Strengthening the London-wide Low Emission Zone**

6. We very much support this proposal given the contribution to pollution of heavy vehicles and the need to deter the use of Euro IV and V vehicles which are currently not covered. We strongly support bringing in this change from 2019, as the Mayor is currently considering as one option.

### **Buses and Taxis**

7. We strongly support the actions planned by the Mayor given the contribution that buses and taxis make to air pollution.

### **Vehicle Excise Duty**

8. We support the Mayor's wish to have more control of Vehicle Excise Duty as a means of geographically targeting VED at the most polluted areas in the country. Our view is supported by recent documents revealed in the court case between Client Earth and Defra, which suggest that the Chancellor is opposed to using differentiated VED for this purpose. Although there may be some opposition to such differentiation outside London, especially in places where there is low pollution, this opposition is unlikely to be strong in London where action to tackle air pollution is widely supported: hence the case for a local dimension to VED.

9. However, as highlighted in the High Court judgment, the Mayor needs to spell out as soon as possible how he would use such powers if he had them, including how the benefits would go beyond what he is already proposing on the ULEZ and LEZ.

### **Differential Parking Charges**

10. Differential parking charges, which would charge petrol, and a range of low emission vehicle types, less than diesel vehicles, could be an important additional tool in limiting air pollution. Some London boroughs area already considering such charges, and, in a few cases, have already introduced them. We believe that the Mayor needs to give more active encouragement to boroughs to introduce such schemes.

### **Diesel Scrappage Schemes**

11. Although the consultation document notes that the Mayor has pressed the Government to involve him in such a scheme, we are less persuaded of the case for such a scheme. This is partly because of the likely cost, but also because it would represent a subsidy from the general taxpayer, or general London resident, towards those car owners who already owned a more polluting vehicle, to encourage the owners to give them up. As such this appears an inequitable transfer towards those who currently pollute the most from those who do not.

### **General**

12. The London Forum, as can be seen, supports much of what the Mayor is proposing in this area, and would like to be associated with this work as details are further worked up.