

House of Commons Environmental Audit Committee

Written submission of evidence by the London Forum of Amenity and Civic Societies

Summary of key points

- a) Considerably more action needs to be taken to address air pollution especially in London but also in other UK cities than is currently being planned.
- b) This reflects the fact that there has been very little improvement in air quality in UK cities over the last 15-20 years as well as the substantial health and environmental damage which air pollution causes.
- c) The main focus needs to be on action on transport, since transport is the largest current source of air pollution.
- d) A particular focus needs to be given to reducing the impacts from diesel vehicles, as the biggest source of particulate and NO₂ pollution.
- e) Concentrated action is needed to provide much stronger incentives and regulatory measures to reduce both the numbers of diesel vehicles and the pollution from those that remain.
- f) Action needs to include much greater public awareness of the damage caused by diesel vehicles, since many people believe wrongly that they have an overall beneficial impact on the environment compared with petrol vehicles.
- g) Action in London needs to cover not just the central area but the city much more widely.
- h) Greater focus needs to be given in EU negotiations to ensure that real world improvements in diesel vehicle emissions are achieved as quickly as possible.
- i) As soon as this is in prospect, the London wide Low Emission Zone (LEZ) needs to be extended to cover NO_x emissions as well as, as currently, particulate emissions; other cities should be encouraged to introduce LEZs on a similar basis as soon as possible.

- j) The planning system needs to address the risk of tall buildings, especially in London, increasing air pollution.**
- k) More attention needs to be given to the implications for air pollution from additional runway capacity at Heathrow, which has not so far been addressed in detail in published material by the Davies Commission.**

Background

1. The London Forum of Amenity and Civic Societies is the umbrella body representing amenity and civic societies across London (e.g. Putney Society, Hammersmith Society). Together it represents nearly 100,000 members of the public. It has among its specific objectives that of aiming to preserve and enhance the environmental quality of London as a city in which to live and work.
2. There were significant improvements in the UK's air quality between the 1950s and the 1990s; but since then there has been very little improvement, with particulates and oxides of nitrogen representing the most significant sources. Recent evidence by a range of health organisations have highlighted the damage to public health, with the Department of Health's Committee on Medical Effects of Air Pollution estimating the number of deaths attributable to it in the UK as equivalent to about 29, 000 deaths per year, equalling a reduction of 6 months off the life averaged over the whole population. The World Health Organisation, in a report published in 2014 has assessed the impact of air pollution in a wide range of cities across the world; and London is highlighted emerges as among the worst in Europe.
3. There is added pressure for the UK to take action, since the EU Commission began legal action in late 2013 over the UK's failure to meet EU limits on NO₂. Since the level of particulate and NO₂ pollution is either the same or higher in a range of other EU cities, it is likely that there will be comparable pressure for action to be taken in other parts of the EU. If such legal action is taken against other countries, this will make it easier for the UK to secure acceptance by other member states of the need for further EU action to

address vehicle emissions at the EU level. Currently there appear to be technical legal, rather than substantive reasons, why other member states have not been similarly threatened.

4. In 2012, air pollution was included among the outcomes of the Department of Health's Public Health Outcomes Framework in England, as an indicator against which performance of public health authorities would be assessed. However, while this was a useful step and could have promise for the future in raising the profile of air pollution in the public health community, little in the way of concrete action has so far resulted.

Action to date on limiting air pollution from transport

5. Some recent action has already been taken; but the impacts have been disappointingly small, especially on transport. Rather, the main benefits have come from the decline in manufacturing industry and the relatively successful EU-based industrial emissions control regime. In particular:
 - a) Successively tightened Euro-standards on new diesel vehicles have not delivered the results expected, both on particulates but especially on NO₂. Given the slow pace of EU negotiations to tighten the standards, there is little prospect of these standards alone making an appreciable difference across the vehicle fleet already on the roads in the next 10 to 15 years.
 - b) The London-wide existing Low Emission Zone (LEZ) appears to have had some impact on reducing emissions. But the impact has been limited, mainly because the LEZ standards are tied to Euro standards, which have not delivered the expected results. Moreover the London LEZ effectively only controls particulate emissions and not emissions of NO_x.
 - c) The Mayor of London has taken additional action to modernise the London bus fleet and introduce less polluting buses. But progress has been limited, given the costs of new buses. There would have been greater benefits to air pollution, if money to fund the expensive 'new bus for London', now operating on about 6 routes, had been spent

instead on the most cost-effective means of reducing emissions on London buses more widely.

- d) The Mayor's plans for an ultra-low emission zone, covering the congestion charging zone, are still in course of being finalised. But the impacts of it on air quality in London are likely to be limited, on the basis of the plans currently outlined, mainly because the area to be covered will only be that inside the Inner Ring Road, not even covering the Inner Ring itself, where some of the worst pollution occurs, let alone suburban centres, such as Putney High Street, and Brixton High Road, and many more, where pollution is high.
 - e) Other measures especially in London have also helped to a limited extent, for example the 'no idling' campaign, aimed at encouraging stationary vehicles to switch off their engine, greater use of greenery on some highly polluted roads, and encouraging more cycling and walking. But without much more concerted action to address the emissions levels of the fleet of vehicles on the roads, the effect of these measures to address air pollution is also likely to be limited.
 - f) Action in cities outside London has also been very limited, especially because there is no extensive low emission zone outside London put into operation, despite funding for feasibility studies paid for by grants from Defra.
6. Since the main contributors to transport pollution are road diesel vehicles, including lorries, cars and buses, action to improve air pollution must address the existing diesel vehicle fleet as a priority. The situation is made more challenging due: a) to the failure to secure agreed real-world improvements from recent EU standards; b) the growing proportion of diesel cars and vans vehicles on the roads relative to petrol vehicles; and c) the fact that many drivers wrongly believe that diesel vehicles are better for the environment than petrol vehicles. On c), the most recent petrol car models are in many cases as good as diesel vehicles from the point of view of CO₂ emissions, so giving diesel vehicles no longer a significant advantage in relation to climate change, while conferring to petrol vehicles substantial air pollution advantages over diesel.

7. A further consideration is that UK, and other European oil refiners generally have a surplus of petrol relative to diesel. So a switch from diesel to petrol will provide economic benefits through reducing our dependency on diesel imports.

Further action needed

8. Given the time that is likely to be needed before the results of any improvement in real world emissions performance from diesel vehicles is seen, short term action needs to concentrate on encouraging the much greater use of alternatives to diesel vehicles based on vehicles already available. In the short term, such measures should include:
 - a) Differentiation of vehicle excise duty, so that for any given level of CO₂ emissions, diesel vehicles are charged at a significantly higher rate than petrol vehicles;
 - b) Extending current arrangements for differential charges for parking in London and other cities, so as to incorporate lower parking rates for petrol vehicles and higher rates for diesel vehicles. This should cover all types of on-street parking, and, wherever possible, paid for off-street parking as well. Petrol vehicles could thus be charged at lower rates than diesel, though higher than rates for ultra-low emission vehicles. The differentials need to be sufficiently significant to provide enough of an economic incentive to drivers to consider changing their vehicle.
 - c) Phasing out the use of diesel cars, vans and lorries from the congestion charging zone as quickly as possible, as part of the introduction of the ultra-low emission zone, and requiring any such vehicles that are allowed in the zone for an interim period to pay a premium rate for entering the zone.
 - d) Providing an economic incentive on taxi-owners, via the licence fee, to switch out of diesel to other fuels, as an extension to existing plans to reduce the permitted age of black cabs.
9. In order to gain widespread public acceptance, these measures will need to be accompanied by action to raise awareness, carried out by both central and local government, of the harm to human health from diesel vehicles,

and to explain that any residual advantages to climate change from diesel vehicles are outweighed, especially in cities, from the damage to local air pollution caused by diesel vehicles.

10. In parallel with this action, more vigour should be put into action at the EU level to secure much more substantial and more rapid improvements in the performance of diesel vehicles. Negotiations to date have suffered from pressure from vehicle manufacturers, on EU member states, on the EU Commission, and on the European Parliament, to keep costs of emissions improvements as low as possible; and this has resulted both in drive test cycles for achievement of the standards which are insufficiently demanding, and in unnecessarily long-drawn out deadlines for improvements. These pressures must be resisted by Government negotiators, as there are already vehicles available which would not have difficulty in meeting more demanding standards.
11. As soon as it is clear that EU standards for diesel vehicles will be coming into force that will make significant improvements in emissions performance relative to current standards, then additional action can and should be taken to provide as strong incentives as possible to make a switch to these vehicles, including though appropriate differential charges in vehicle excise duty, in congestion charging rates and in parking charges and in the regulations governing entry to the London-wide low emission zone for heavy vehicles.
12. In addition, the current London-wide low emission zone should then be extended so that it includes limits on NO_x emissions as well as, as currently, on particulate emissions. This can be done for heavy vehicles using selective catalytic reduction (SCR) equipment, including when this is fitted on vehicles already in service, with enforcement carried out through the annual test carried out by the Vehicle Inspectorate. This would also provide benefits to UK firms who manufacture SCR equipment. Cities outside London should also be given greater encouragement to establish their own low emission zones on the same basis.

13. In addition, the planning system needs to be more sensitive to air pollution.

The national planning policy framework (NPPF) addresses air pollution to some extent. But there is a particular risk that plans for a significant number of additional tall buildings in London will increase air pollution, though creating 'street canyons', which trap pollutants. Planning permission for tall buildings therefore need to include specific safeguards that air pollution will not as a result be worsened.

14. Finally, there are significant risks that plans for additional runway capacity at Heathrow will increase air pollution in that area. The area around Heathrow already has high levels of air pollution, caused especially by the amount of road traffic in and around the airport. Even if, as reported, any additional runway capacity is accompanied by the introduction of a congestion charge, the net effect on air pollution is likely to be negative, due to the increase in road traffic and flight movements generated. The Davies Commission did not address this issue in any detail in their interim report of late 2013; and it is important that both the Davies Commission and Government consider the air pollution implications of airport development as a higher priority.