

London Forum of Amenity and Civic Societies

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Joint select committee inquiry into air quality

Written evidence from the London Forum of Amenity and Civic Societies

Summary of evidence

1. We believe that, while Government plans for air quality do show good awareness of the health and environmental impacts of air pollution, their plans to date fall well short of showing sufficient action to address the problem, both in reducing these impacts and to achieve compliance with EU legal requirements. Nor do the most recent plans go beyond action on NO₂. There is a need to show ambition also on other aspects of air pollution, especially particulates.
2. Poor air quality can be a deterrent to businesses. The Government should show more awareness of this in its economic strategies, especially given the challenges posed by Brexit.
3. Other countries face similar or worse air pollution problems; but may well outstrip the UK in action to address the problem. Several are already showing greater ambition, for example in planning to phase out diesel cars and vans significantly earlier than the UK Government is.
4. Cross-Government collaboration certainly exists, and has benefited from the joint Defra/Department of Transport unit to address air quality; but collaboration falls well short of what is needed, most notably in taxation measures.
5. Local authorities, especially outside London, appear to be struggling to produce effective solutions in place; and in London also considerably more action is needed than what the Mayor has so far announced. The Government needs to produce a stronger national framework for addressing air quality, as this will be more cost-effective than each authority coming up with its own solutions.
6. The Government should be giving more encouragement for local authorities to devise clean air zones involving charging. It makes no sense for the Government to say that this should only be considered after other options have been considered, when its own analysis clearly points to these being the most cost-effective solution.

7. Key ingredients in a Government plan should be earlier action to phase out diesel vehicles from the roads of polluted cities in the UK, and, to help achieve this, a stronger programme of financial incentives including charge-based clean air zones.
8. The case for action to phase out diesel vehicles is reinforced by the diesel emissions scandal, which came to light in 2016. The clear evidence that Euro 6 cars and vans do not produce anything like the originally expected emissions reductions, compared with earlier generations of diesel vehicles, under normal driving conditions, reinforces the case for early action on phase-out.
9. There need to be stronger links between the aims of reducing air pollution and wider transport policy, especially in relation to traffic reduction and a reduction in pollution from trains, shipping and aviation. A third runway at Heathrow will only exacerbate the situation.
10. Given Brexit, it is very unclear what European legal requirements on air pollution, including on vehicle emissions, will apply in the UK for the longer term. The Government should give an early firm commitment that it will expect to mirror all reasonable future EU requirements on vehicle emissions in UK legislation, to provide certainty that we will not over time slip behind standards that will apply elsewhere in Europe.

Introduction

11. The London Forum of Amenity and Civic Societies represents about 130 local amenity and civic societies across London. Air pollution has now become very high on many local societies' concerns.
12. Public understanding of the health and environmental impacts of air pollution has greatly increased in recent years – helped considerably by the evidence put out by public bodies, such as the Department of Health sponsored Committee on the Medical Aspects of Air Pollution. This is the case, even though there is more to do in spreading local awareness of action that individuals, especially, can take. Economic assessment of the impacts of air pollution, including examination of costs and benefits of alternative action, has also improved.
13. The same is not true, however, as far as progress on solutions to air pollution is concerned. While we welcome the steps that the Mayor of London in particular has taken in recent years, both to accord relatively high priority to tackling air pollution, and in introducing measures to enhance low emission zones in London, we believe that significantly more progress is needed to develop solutions as soon as possible, both in London and in other parts of the UK.
14. The Government often seems to be over-concerned about the possibility of an adverse reaction from drivers from stronger measures to address air pollution. In practice, there has been a wide acceptance of such measures, especially when these have been accompanied by a clear statement of the health and environmental benefits, and when

sufficient warning is given of plans, so that drivers have time to adjust their travel patterns.

Long term aspirations

15. Air quality has often been considered as an environmental issue alone, without regard to the wider economic impacts of pollution. Yet there is considerable evidence that pollution can deter businesses from establishing a presence in particular places – a particular issue in London, which the Mayor of London has recognised in his recent economic strategy. We think the Government needs to show much more awareness of this in its strategic economic thinking. This is a particular challenge in relation to Brexit, given the competitive economic pressures that the UK will be facing in attracting businesses, who might otherwise be tempted to move elsewhere, to what they may see as cleaner parts of Europe.
16. The Government has said in July 2017 that it intends to end the sale of all new conventional petrol and diesel cars and vans by 2040. This is a much slower timetable than the intention jointly announced in late 2016 by the mayors of Paris, Athens, Madrid and Mexico City to have all diesel cars and vans off their roads by 2025, especially as the UK Government's intention relates only to sales and not to vehicles on the roads. We think the Government and the London Mayor should be planning for a similar timetable to the mayors of those cities in relation to diesel cars and vans. There is also a need for a Government air quality strategy covering all key aspects of air pollution, including both NO₂, as in the Government's most recent plans, and particulates

Clean air zones

17. An essential ingredient of any set of measures to reduce air pollution is a system of clean air zones (or low emission zones). The economic analysis accompanying the Government's plans, published in draft in May 2017 (and in final form in July 2017) to reduce roadside concentrations of nitrogen dioxide recognised this, by showing significantly higher benefits in NO₂ reduction from clean air zones involving charging drivers than any alternative measures. Moreover there was no quantified estimate provided of the alternative of clean air zones not involving charging.
18. Despite that, the Government's draft and final plans suggested that local authorities should not propose clean air zones involving charging unless and until they had shown that other alternatives (including clean air zones without charges) would produce less good results.
19. We think this is an untenable position, for four reasons. First, the Government's own analysis shows that clean air zones involving charging would produce significantly higher benefits than any alternative shown.

20. Second, the Government were not able themselves to model the impact of clean air zones not involving charging; so it is not clear how local authorities can be expected to do so.
21. Third, the Government's plans expect a great deal of local authorities in terms of evidence gathering, when it would be more cost-effective for this to be done centrally. With the likely exception of London, it will be very difficult for local authorities to have the capacity to produce sufficient evidence themselves.
22. Fourth, air quality improvements would be produced more quickly if authorities proceeded straight to charged clean air zones (after appropriate local consultation) than if they went through what appears to be an unnecessary intermediate step.
23. For all these reasons, and influenced especially by the Government's own analysis, we believe that the Government should be working with local authorities to move much more quickly to clean air zones involving charging than its current plans suggest.

Action to reduce air pollution in London

24. London is known to have the worst air pollution in the UK. We welcome the steps that the Mayor has taken, or is proposing, so far. But more action is needed than he has so far proposed. In particular, the proposed ultra-low emission zone needs to cover a wider area of London than that bounded by the North and South Circular Roads (which is all that he has proposed so far), since air pollution in London extends well outside these limits. In addition, further measures are needed to discourage Euro 6 diesel cars and vans, which the Mayor is not currently proposing and whose high level of emissions the Volkswagen emissions scandal has highlighted, and to reduce pollution from trains and river transport (see below).
25. The decision, still to be made, on whether and how additional aircraft runway capacity should be provided in the South East provides a further air quality challenge. We have strongly opposed the construction of a third runway at Heathrow, partly on air quality grounds. The area around Heathrow already poses a significant air quality challenge – (including from a recent significant increase in air freight and associated lorry movements); and this reinforces the case both for not proceeding with a third runway there, but also for extending the ultra-low emission zone to cover the Heathrow area.

Financial incentives more widely

26. We emphasise that such charging schemes do not have to involve penal levels of additional costs on drivers. Appropriate reductions in taxes and other charges for low emission vehicles could accompany higher charges for more polluting vehicles; so that drivers who switched to the former could save money. And a firm plan for charging, with advance notice, would give drivers more time to adjust.

27. There are at least two other kinds of charges which should be actively considered, in addition to those relating to clean air zones.
28. The first are parking charges, differentiated according to the levels of local air pollution produced by different types of vehicle. This is a measure which would be relatively easy for individual local authorities to introduce, in order to incentivise further low emission vehicles. Some local authorities have considered, or in a few cases, introduced, such differentiated charges, building on the more widely use of differentiated parking charges based on CO₂ emissions. But surprisingly, the Government's plans for reducing NO₂, published in July discourage such measures. We can see no justification for this; and we think that local authorities should be encouraged to consider such measures in polluted areas, to complement action to introduce clean air zones.
29. The second is differentiated vehicle excise duty (VED) based on levels of particulates and NO₂. The Government has said that this is being considered, and is no doubt a possibility for the Chancellor's Budget in late November (after the 9 November deadline for submissions to this select committee inquiry).
30. We think that such differentiated VED should be a clear adjunct to charges for clean air zones, to provide a clearer signal to manufacturers and purchasers of cars and vans. As with other charges, such differentiation could involve lower VED for low emission vehicles as well as higher charges for those with high emissions.
31. The Government has implied, in its July plans, that such VED changes may only apply to new vehicles. However we believe that they should also apply to existing vehicles, after a lead time so as to enable vehicle owners to adjust, in order to help remove older, and therefore most polluting vehicles, more quickly.

Types of vehicles to be discouraged

32. Diesel vehicles are undoubtedly the most polluting type of vehicle seen in substantial numbers on our roads.. It is highly likely that there will still be significantly more pollution from diesel vehicles than from other vehicle types even after the latest modifications to EU requirements for Euro 6 vehicles have come fully into effect, in the wake of the emissions cheating scandal which came to light in 2016.
33. We are therefore concerned that, to date, there have been no signs of Government willingness to discourage Euro 6 cars and vans in favour of alternative vehicles, including petrol-driven vehicles. Discouraging diesel vehicles more widely is also likely to favour our balance of payments, since there is more petrol available at UK refineries than diesel. We therefore believe that greater steps should be taken by Government to discourage diesel vehicles generally relative to less polluting alternatives.
34. We welcome the Government's increased focus on encouraging electric vehicles. These are, however, often heavier than conventional vehicles (given the weight of their batteries) and may have faster acceleration. This reinforces the case for the Government putting more focus on the case for new kinds of road surfaces which can help reduce particulate pollution especially from tyre and brake wear.

Wider transport policy and cross-government collaboration

35. We welcome the recent establishment of a joint air pollution team covering the Department of Transport and Defra. We believe, however, that the Department of Transport should put more focus on wider aspects of transport policy to reduce air pollution, especially a greater focus on traffic reduction, on smoothing traffic flow (especially by better coordination of road works), and on measures to address air pollution from trains (a particular issue at inner city major stations where diesel locomotives are used), shipping and aviation. These are all significant polluters, where there need to be stronger strategies to address them. It is not possible for local authorities to address these forms of pollution themselves, since they lack many of the legal powers to do so (for example in relation to rail franchise conditions which, if modified, could reduce air pollution at main line stations or at airports).
36. Cross-Government collaboration also is extremely weak (and often non-existent) in addressing taxation solutions to air pollution. The outdated principle that the Treasury should decide tax measures which have a major bearing on other departments' policies without consultation either across other interested Government departments or with external stakeholders (in contrast to virtually every other kind of policy measure) should be brought to an end. A strong example of this is in relation to tax measures to address air pollution such as differentiated VED.

Impact of Brexit

37. The Government has implied that all EU existing requirements relating to air pollution already in UK legislation will be transposed into UK law, though we have yet to see details of this, including whether it will include requirements, especially in ambient NO₂ levels, that the UK is currently failing to meet.
38. However this leaves a major concern about future EU requirements on air pollution (as it also does on other environmental requirements). EU requirements are certain to be modified, and almost certainly made more stringent, over coming years. A good example of this is vehicle emissions standards, with tighter standards expected following Euro 6/VI limits that have already come into force. Similarly we can expect in coming years new EU limits on national emissions ceilings, on industrial pollution, as well as on ambient air pollution.
39. But it is far from clear that, with Brexit, UK governments will be prepared to incorporate any such new limits into UK law. While we can understand that the UK Government would not wish to give a blank cheque now when such limits have not yet been agreed in the EU, we believe that the Government needs to give a clearer signal now that in principle it will mirror future EU air quality standards where these are reasonable. Otherwise we can assume that the UK will gradually fall behind standards applying in the

rest of the EU, to the detriment of air quality; and that the Government's stated aim of compliance with EU standards will turn out to be only a limited, short-term aim.

Conclusion

40. We are glad that the damage caused by air pollution is gaining more traction both within Government and among the public. But while there is a better appreciation of the problem, considerably more needs to be done to focus on more ambitious solutions. Without this, and especially taking Brexit into account, it is likely that the UK will fall further behind other developed countries, and that health and the environment will continue to suffer.

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November 2017