



## **Response from London Cycling Campaign to the proposed Ultra Low Emission Zone**

January 2015

London Cycling Campaign is a charity with more than 40,000 supporters of whom 12,000 are full members. We speak up on behalf of everyone who cycles, or wants to cycle, in Greater London. Our aim is for London to be a world class cycling city. Founded in 1978, our organisation campaigns for every street in the city to be cycle friendly so millions more Londoners, whatever the age or ability, can enjoy the benefits of cycling, helping to create a cleaner, healthier and less congested capital.

We welcome the opportunity to comment on the Ultra Low Emission Zone (ULEZ) consultation.

### **Introduction**

London Cycling Campaign fully supports the implementation of an Ultra Low Emission Zone by the Mayor and Transport for London. An Ultra Low Emission Zone will help to reduce air pollutants and CO2 emissions, support walking and cycling, improve public health and contribute to climate change mitigation<sup>1</sup>.

An equivalent of 4,300 deaths in London is attributed to air quality related illness per year. Negative health impacts associated with pollution have also been linked to infant mortality rates, on pre-term birth and on cognitive performance in children, and there is strong evidence to suggest that children growing up near motor traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development.<sup>2</sup> While some research has suggested cyclists experience lower pollution levels than those who travel by car, it is irrefutable that our health is being severely damaged by exposure to polluted air caused by traffic emissions. At high concentrations, NO2 causes inflammation of the airways. Long-term exposure is associated with an increase in symptoms of bronchitis in asthmatic children and reduced lung function growth. Particulate matter is an equally major issue: long term exposure to particulate matter contributes to the risk of developing cardiovascular and respiratory diseases, as well as of lung cancer. Research shows that particles with a diameter of ten microns and smaller (PM10) are likely to be inhaled deep into the respiratory tract. The health impacts of PM2.5 are especially significant as smaller particles can penetrate even deeper. Stage 2 limit values for PM2.5 (20 micrograms per cubic metre by Jan 2020) were reported to have been met in all areas of the UK except Greater London in Defra's latest Annual submission to the European Commission (published September 2014). Limit values for hourly NO2 were also met in all zones except Greater London.<sup>3</sup> The Mayor has set out a roadmap to compliance with EU legal limits of NO2 emissions by 2020 in his Air Quality Manifesto. However, even with the proposed ULEZ it will only deliver two thirds of the emissions reduction required.

Poor air quality is a deterrent to cycling - cyclists tend to perceive the risk from air pollution more than the general public - and a shift to sustainable modes of transport will improve air quality and make walking and cycling more attractive. As journeys cycled do not generate air pollution, a shift towards cycling can contribute to better health outcomes for all Londoners, whether they cycle themselves or not. Encouraging a shift towards walking and cycling would clearly support the

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<sup>1</sup> The cost to UK society of air pollution is £10.6bn, even higher than the costs of physical inactivity (£9.8bn) and road collisions (£8.7bn).

<sup>2</sup> <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/212/212.pdf>

<sup>3</sup> <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/212/212.pdf>

Mayor's goal of compliance with EU legal limits of NO<sub>2</sub> emissions by 2020. It is therefore essential that the ULEZ should contribute towards a reduction in motor vehicle use and shift to sustainable modes, integrating with existing policies. Mayoral policy, as described in the London Plan, is to increase cycle use and to reduce motor car use and car dependency, alongside improving air quality in the capital and reducing health inequalities. The Mayor's Transport and Air Quality strategies must complement each other if these goals are to be achieved. Construction of new roads and tunnels in the capital, such as the proposed Silvertown Tunnel, will encourage the growth of motor traffic and conflict with air quality objectives.

We note that many of the areas shown to exceed legal limits for pollution are outside the proposed ULEZ zone, especially on the boundary roads and major radial roads leading to the boundary. We further note that some of the hybrid vehicle options proposed allow low or zero emission operation for short distances to be counteracted by higher pollution at other times. These conditions could lead to an increase in pollution in the areas outside the proposed zone. This is a particular problem for NO<sub>x</sub> gases which are the hardest pollutants to control with existing technology.

Actions to introduce the ULEZ should be combined with policies to reduce the amount of motorised road transport in Central London to ensure that the pollution is not simply transferred from roadside to locations where power is generated by unsustainable means.

We note that supplementary information: 15.2 states: "In most instances, a high daily charge levied on non-compliant vehicles demonstrated a larger uptake of compliant vehicles but also a much higher proportion of journeys being deterred (ie not being made). Very few car and van users were assumed to stay and pay a high daily charge. It should be noted here that reducing the volume of traffic in central London is not an explicit goal of this policy." This fails to consider whether journeys were or could be made by cycle or on foot rather than by motor vehicle. Cycling, as the Mayor states in his Vision for Cycling, can 'cut road and rail crowding, cut noise, cut pollution and ill-health'; and is 'something that improve(s) life for everyone'. Integration with the Mayor's Vision for Cycling and ensuring that the overall road policy framework does more to incentivise modal shift through creating safe and inviting space for cycling is essential. A number of key routes for cyclists are currently failing to meet the EU limit values for nitrogen dioxide levels. Mile End Rd, home to the notorious Cycle Superhighway 2 (CS2), failed to meet the limit by over 50% in 2012. Investment in good quality Dutch style infrastructure on main roads to ensure routes like CS2 are fit for purpose and encourage a shift towards cycling is critical. Funds collected through the ULEZ should be ringfenced and spent on promoting sustainable transport modes.

The ULEZ should also integrate with the existing Low Emission Zone (LEZ) so that the two schemes complement each other. The LEZ must apply to all vehicles by 2025 and progressively tighten minimum compliance standards.

There is also a strong economic case for implementation. The Government estimates that the economic cost of the health impacts of poor air quality in the UK is around £15 billion, within a range of £8 - 17 billion. This would suggest that in London the economic cost of the health impacts of poor air quality could as high as £2 billion. Accordingly, reductions in emissions and exposure are likely to generate significant savings in health budgets and therefore are worth investing in purely on the basis of preventative health care.<sup>4</sup> Furthermore, the UK could face multi-million pound fines without urgent action to ensure compliance with EU legal limits.

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<sup>4</sup> Defra, Air Pollution: Action in a Changing Climate, 2010.

In summary, we fully support the creation of an Ultra Low Emission Zone. However, we request that the following improvements are made to the proposals.

**1. The potential for the ULEZ to cover a wider area is not given sufficient consideration in this proposal.**

- We note that the proposed ULEZ will cover the congestion charging zone. The boundary road of the CCZ is where the highest levels of motor vehicle pollution have been recorded. This ULEZ must be extended to cover central and more of inner London. This will deliver greater emission reductions and benefit a larger proportion of the Greater London population. While it is recognised in the supplementary information that it is 'feasible in principle for the zone to be extended in the future beyond the current proposed boundaries', it also states that 'any proposals to expand the currently proposed ULEZ would need to be subject to a separate public and stakeholder consultation and could not be accommodated in the current exercise.'
- The current proposals will not result in EU Air Quality targets being met across London and will not address air quality hot spots outside the congestion zone. Swiss Cottage, Old St, Mile End Rd, East Cross route, A4 corridor, Brixton Rd, Putney High St, Catford and Westthorne Avenue in Greenwich are just a few examples of air quality hotspots outside the congestion charging zone which have failed to keep pollution levels within the government's Air Quality Strategy Objectives in 2014.<sup>5</sup>

**2. The introduction of the ULEZ should be combined with other policies to reduce the volume of motor traffic in London.**

- Modern technologies struggle to eliminate NOx from vehicle emissions and electric power often relies on unsustainable, polluting generating stations. Policies set out in the London Plan and the Vision for Cycling propose to reduce the need for motor vehicle travel and increase the proportion of trips made by non-polluting modes. Revenue raised by an extended ULEZ should be used to accelerate these policies.

**3. The ULEZ should go beyond Euro 6/VI standards, and include a schedule towards zero emissions.**

- We welcome the requirement for all taxis and new private hire vehicles presented for licensing from 2018 to be zero emission capable, and the proposals by Transport for London to progressively increase the number of compliant buses to the point that from 2020 only buses that meet requirements will be operated on routes that enter the ULEZ. However, this requirement should go further and cover all buses in inner and outer London, with vehicle replacements made as soon as possible to ensure emissions savings are realised earlier. The ULEZ should include a schedule for progressively improving emissions standards, working towards zero emissions standards for all vehicles as soon as possible.

**4. The ULEZ must be adopted sooner.**

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[http://www.londonair.org.uk/london/asp/publicstats.asp?mapview=all&statyear=2014&MapType=Google&region=0&site=TH4&postcode=&la\\_id=&objective=All&zoom=11&lat=51.50323961993421&lon=0.026690716708319684&VenueCode=](http://www.londonair.org.uk/london/asp/publicstats.asp?mapview=all&statyear=2014&MapType=Google&region=0&site=TH4&postcode=&la_id=&objective=All&zoom=11&lat=51.50323961993421&lon=0.026690716708319684&VenueCode=)

- Implementation should be brought forward and phased in as cleaner options become available for the different vehicle categories.

We support the proposal to operate the ULEZ 24/7.

The ULEZ has the potential to make London a more pleasant place to live, work and travel around, and to contribute to the transformation of our streets into safe and inviting spaces for cycling. However, it must set ambitious standards that turn around London's embarrassingly poor record on air quality and help it to become the best big city in the world.