

# Response by the London Cycling Campaign to the Mayor's Consultation the central London Ultra-Low Emission Zone

June 2017



## About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 40,000 supporters of whom 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

LCC is a member of the **Healthy Air Campaign**, a coalition of household-name health, environment and transport organisations co-ordinated by Client Earth, that campaigns to clean up London's and the UK's air.

## General Comments

We welcome the opportunity to comment on the consultation launched by the Mayor of London, Sadiq Khan, on the central London Ultra-Low Emission Zone. Our views have not changed since the Mayor's consultation on Cleaning up London's Air last year and this response repeats, and adds to, the points from that submission.

We firstly note that London's air quality not only continues to breach EU legal limits, it's much worse than the standards called for by the World Health Organisation (WHO). The equivalent of over 9,000 Londoners die prematurely every year as a result of air pollution. Almost a quarter of primary schools are sited in areas that breach the legal limit for nitrogen dioxide (NO<sub>2</sub>). Doctors report that children spending their early years in parts of the city are suffering serious, long term (sometimes permanent) impacts to their health and development. The WHO estimates that air pollution costs the UK economy approximately £54 billion a year. The economic cost of London's dirty air in terms of health impacts is estimated at up to £3.7 billion annually for PM<sub>2.5</sub> and NO<sub>2</sub> pollutants.

A recent study by King's College has found that more than half of the 995 hospital and clinic sites in central London exceed the EU standards for nitrous oxides. We note also the forthcoming NICE investigation and recommendations on air pollution, which will recommend encouraging walking and cycling as well as introducing clean air zones. The current levels of air pollution in London are unacceptable and LCC commends the Mayor for intending to tackle it head on.

Regarding the wider proposals from the Mayor to tackle air quality (including those contained in this specific consultation), we note that he is intending to levy charges on the most polluting cars, vans and HGVs (especially diesels), as well as to make buses cleaner. In particular the Mayor proposes to:

- Introduce a new "Toxicity" or T Charge into the Congestion Charge area for the most polluting vehicles from October 2017
- Bring the implementation of the central London Ultra Low Emission Zone (ULEZ) forward by one year to 2019
- Expand the ULEZ (Ultra Low Emissions Zone) beyond central London in 2020
- Give Transport for London (TfL) the go-ahead to start looking at a diesel scrappage scheme as part of a wider national scheme that the Mayor is calling on the government to run

- Keep Londoners better informed and alerted when pollution is at its worst
- Make sure Transport for London cleans up its bus fleet and buys only hybrid or zero emission double-decker buses from 2018

We welcome and support these proposals. That said, LCC urges the Mayor to go further. Some of our partners in the Healthy Air Campaign are making submissions to improve important aspects of them, for example in respect of the technical standards for vehicles: we ask that the Mayor takes these concerns very seriously. For our part, LCC would like to respond specifically as follows.

## Specific Comments

1. **We strongly support the principle of the Ultra Low Emission Zone to improve air quality in London. We believe that the ULEZ should be extended to the whole of London:** the centre's air has the highest concentration of pollutants but illegal levels of pollution occur all over London and everyone deserves protection.
2. **We strongly support bringing forward the implementation of the ULEZ in central London from 7 September 2020 to 8 April 2019.** There must be no further delay in improving air quality for Londoners.
3. **We strongly support introducing a Particulate Matter (PM) standard for diesel vehicles within the ULEZ standard.** The scandals surrounding manufacturer avoidance of true emissions measures demonstrate that these standards must be defined and enforced by authorities.
4. **It is not enough to tackle tailpipe emissions. To radically improve air quality the Mayor should incentivise "modal shift" to walking and cycling:** the Mayor must make walking and cycling safe and attractive enough to become the norm (particularly for local journeys), as well as improve public transport and access to car-sharing schemes (as an alternative to car ownership). Mass modal shift is vital to reduce motor traffic and thus help clean up London's air – we welcome the target set in the draft Mayoral Transport Strategy (MTS 2017) of 80% of journeys to be made by "sustainable modes" by 2014 and the potential to do so is enormous: surveys show 25% of Londoners would like to cycle more (compared to the 2-3% of trips currently made by cycle), and in some parts of London around 50% of car journeys are under 3 miles in length. The need and opportunity to maximise modal shift requires the same attention by the Mayor as his justified focus on pollution.

Further, we note that Oslo has pledged to reduce motor traffic reduction by 20% by 2019, and phase out private car use in its city centre altogether. Large areas of Copenhagen are car-free, and Paris has begun to make areas of the city car free (albeit only at certain times). London, which is of course a much bigger city than those cited can learn from these examples and itself introduce car free zones across the city. Plans to make Oxford Street motor traffic free are an excellent start.

5. **The Mayor should incentivise modal shift for deliveries and services (micro distribution using cargo bikes is included in the draft MTS 2017) :** we also note that there is a significant opportunity to assist businesses to switch to using cycles (including electrically-assisted cargo/freight cycles) to deliver goods and services within London (especially the centre): the Mayor must incentivise modal shift of this kind too, and highlight the joint pilot initiative of the city of Hamburg and UPS as an example of how this may be done.
6. **The Mayor should invest in walking, cycling, public transport and smarter car use (including, as noted in draft MTS 2017, the use of smart road charging systems):** funds will be generated from the charging scheme and these must be used to help ensure that investment in cycling infrastructure/other measures to make cycling safer and more attractive is accelerated and expanded. In particular, the Mayor made specific promises to LCC's Sign for Cycling campaign and pollution charging will help guarantee that the Mayor meets

these promises. Also, it would be unjust not to provide support for individuals and organisations who will find it more difficult to change to new types of vehicles and/or ways of going about their business.

7. **The Mayor should use the Liveable Neighbourhoods and Healthy Streets programmes to reduce pollution hotspots in town centres and high streets:** one of the specific promises the Mayor made to LCC's Sign for Cycling campaign was to give every borough the chance to have a Mini-Holland style programme, and we understand that the Mayor is looking into this as part of his Healthy Streets and Liveable Neighbourhoods agenda. We urge that maximum impetus is given to this objective for its own sake but also because it would help clean up the air in high streets and town centres in every borough, where localised air pollution can be very high.
8. **The Mayor should not pursue policies that increase motor traffic, pollution and congestion:** the Mayor must avoid policies that would heighten pollution and thus undermine efforts to clean up London's air, through the increased motor traffic and congestion that they would cause. This includes not going ahead with new river crossings (such as the proposed new Silvertown Tunnel) or road building unless for purposes of providing new walking, cycling and public transport links.
9. **The Mayor should join up policies on pollution, climate change transport, public health and quality of life under a unifying strategic framework:** finally, and more broadly, the Mayor must use his pollution-reduction programme as a platform to also drive down London's carbon emissions (London's 60% carbon emissions reduction target looks increasingly at risk of not being met), reduce congestion, improve public health and create better places to live, work and play. His policies to cut pollution provide an opportunity to join up action across many pressing areas of public policy, and address multiple challenges. The Mayor should not let that opportunity pass London by and adopt a connected, over-arching strategic framework for tackling these problems rather than put these objectives at risk through a piecemeal approach.

## Concluding Remarks

Cleaning up London's air quality is a life and death issue that the Mayor has rightly put at his agenda. LCC recognises the formidable challenges ahead and the need for civil society to play its role in overcoming these hurdles. As well as highlighting where we believe policy should be improved we will support the Mayor and TfL in implementing genuinely transformative measures.