

## ON KNIGHTSBRIDGE ASSOCIATION LETTERHEAD

**URGENT ACTION REQUIRED: CONSULTATION CLOSSES ON 2 FEBRUARY 2007**

Our reference: Trencom/Mayor/07

13 January 2007

Ken Livingstone  
London and Chair of TfL Board  
Customer Services  
23<sup>rd</sup> Floor Empress State Building  
Empress Approach

Freepost RLUA-CUHG-JGKL Mayor of  
Low Emission Zone Consultation Central  
Chiswick Gate  
598-608 Chiswick High Road  
London W4 5RT London SW6 1TR

By email: [mayor@london.gov.uk](mailto:mayor@london.gov.uk)

**Mayor and TfL please confirm receipt**

Dear Mr Livingstone (and Transport for London)

### **Response to Second Consultation on the Low Emission Zone**

The purpose of this letter is to respond on behalf of The Knightsbridge Association, which represents over 1,000 people and businesses in the area between Hyde Park Corner and Queen's Gate, to the consultation being carried out by Transport for London (TfL) on your behalf on a proposal to introduce a Low Emission Zone (LEZ) in 2008. This letter is supported fully by the "Campaign for Clean Air in London" which seeks to achieve urgently World Health Organisation (WHO) recommended standards of air quality throughout London noting that most of these were expected to be achieved by January 2010 in 1999 legislation.

### **Summary**

The Knightsbridge Association supports strongly road pricing and emission schemes in general and seeks that they should be ambitious, effective and well thought through. We have been concerned to discover from the consultation documents for the proposed LEZ that a serious problem with particulate matter air pollution (PM<sub>10</sub>) is still expected in 2010 and that:

1. The Base Case for nitrogen dioxide (NO<sub>2</sub>) air pollution in London over the next few years is expected now to be more than twice as bad as TfL had thought only last January and with no end now in sight;
2. European Union (EU) legal limits and WHO recommended standards for NO<sub>2</sub> are not being given the same priority as the same limits for PM<sub>10</sub> even recognising the differences between them;
3. The proposed benefits of the LEZ are now less than they were in early 2006;
4. The latest proposal for the LEZ does not address adequately the major changes that have taken place in the external environment since the first LEZ consultation in January 2006;
5. The consultation documents make clear that the proposed LEZ will have a "negligible" impact on climate change and no "significant impacts on traffic levels or congestion"; and
6. Costs are higher than they would have been if action had been taken as soon as 1999 air pollution legislation was published and will increase sharply if tough action is delayed.

Fresh thinking is need urgently by TfL and the Mayor to deliver a more ambitious LEZ that tackles much sooner and more effectively the serious air pollution problem in London.

## Introduction

Air pollution can best be reduced to meet WHO standards of air quality throughout London by reducing traffic volumes or individual vehicle emission levels or both. The Congestion Charge is a “blunt” version of road pricing to tackle the former, with considerable “collateral damage” (e.g. due to “rat running”), and the proposed LEZ offers the opportunity to tackle the latter. The Knightsbridge Association supports strongly road pricing and emission schemes in general and seeks that they should be ambitious, effective and well thought through. In our view, fresh thinking is need urgently by TfL and the Mayor to deliver a more ambitious LEZ that tackles much sooner and more effectively the serious air pollution problem in London.

When we wrote to you in response to the first LEZ consultation on 9 April 2006, we expressed serious concern then that the proposed scheme did not go far enough, fast enough, to improve air quality in London. We have still not received any follow up from TfL or the Mayor’s office to the request in that letter: “We are keen to understand, through a meeting or otherwise, whether TfL and the Mayor’s office considers that the combination of the Congestion Charge Extension from February 2007 and TfL’s currently proposed Low Emission Zone plans from early 2008 are likely to reduce actual air pollution levels sufficiently to meet official air pollution targets across the Knightsbridge area.”

Please reply personally to this letter, in your capacity as Mayor of London and Chair of TfL Board, commenting on the general points raised and more specifically by responding to the eight questions asked in it.

## Comments on the LEZ consultation

While we support the principle of an LEZ for London, we are concerned about ongoing PM10 problems and the following other aspects of the scheme highlighted by the latest consultation documents:

- 1. The Base Case for NO<sub>2</sub> air pollution in London over the next few years is expected now to be more than twice as bad as TfL had thought only last January and with no end now in sight.**

Comparing the January 2006 and November 2006 consultation documents shows that TfL expects now more than twice as many people to be exposed to over 40  $\mu\text{g}/\text{m}^3$  of NO<sub>2</sub> in its Base Case for 2008 (without the LEZ) (i.e. people exposed to more than the WHO recommended standards of air quality and the EU legal limit in 2010). In fact, TfL’s expectations have deteriorated so much during 2006 that, now, the Base Case for 2012 shows the same number of people exposed to unhealthy levels of NO<sub>2</sub> as were previously expected for the Base Case in 2008. The numbers in the Base Cases are large too: 740,000 more people exposed than previously expected for 2008 and nearly three-quarters of a million people still exposed to unacceptable levels of NO<sub>2</sub> in 2010 when EU legal limits for NO<sub>2</sub> are due to be met. See Table 2 on page 4 of this letter for full details.

In 2006, NO<sub>2</sub> air pollution in Marylebone Road, Kings Road and Brompton Road was well over double the WHO annual mean recommended standard with peaks occurring between 8 and 34 times more often than the WHO maximum recommended exceedance level for an hour of exposure would allow. Note also that the monitoring site for Marylebone Road is “Kerbside” whereas they are “Roadside” for the other two roads (i.e. further from the road). See Table 1 below for details of air pollution levels at other sites. Clearly, such levels of air pollution in London are totally unacceptable and are getting worse for NO<sub>2</sub> in busy roads.

Air pollution in Brompton Road is currently at the highest levels recorded since regular monitoring began here. According to the excellent London Air Quality Network ([www.londonair.org.uk](http://www.londonair.org.uk)), annual mean levels of NO<sub>2</sub> in 2006 were 95 µg/m<sup>3</sup> (compared to the previous peak of 93 µg/m<sup>3</sup> in 2003 and the lowest level of 83 µg/m<sup>3</sup> when regular monitoring began in 2001). Hourly maximum recommended exposure levels for NO<sub>2</sub> were exceeded on 383 occasions in 2006 (compared with the previous peak of 288 exceedances in 2005 and (again) the lowest recorded of 97 exceedances when monitoring began in 2001). These compare with WHO and EU standards of 40 µg/m<sup>3</sup> and 18 exceedances respectively.

**Table 1: Levels of NO<sub>2</sub> at worst sites in the London boroughs with the largest populations exposed to air pollution according to data from [www.londonair.org.uk](http://www.londonair.org.uk) (and the City of London with its large working population)**

London Air Quality Network	2006 level of NO <sub>2</sub> in µg/m <sup>3</sup> and number of hours		2005 level of NO <sub>2</sub> in µg/m <sup>3</sup> and number of hours		Highest previous level of NO <sub>2</sub> in µg/m <sup>3</sup> and number of hours	
	Annual mean	Hourly exceedance	Annual mean	Hourly exceedance	Annual mean	Hourly exceedance
Camden: Swiss Cottage	71	38	76	18	76 (2005)	69 (1997)
City of London: Senator House	48	0	51	2	58 (2003)	2 (2005)
Islington: Holloway Road	67	4	74	20	74 (2005)	20 (2005)
Kensington and Chelsea: Brompton Road	95	383	90	288	93 (2003)	288 (2005)
Kensington and Chelsea: Kings Road	97	139	91	82	98 (2003)	82 (2005)
Southwark: Elephant and Castle	46	0	49	0	56 (1999)	27 (1997)

Westminster: Marylebone Road	<b>109</b>	<b>619</b>	<b>113</b>	<b>849</b>	<b>113 (2005)</b>	<b>849 (2005)</b>
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Bold indicates that the results exceeded the WHO and EU recommended standards of air quality of  $40 \mu\text{g}/\text{m}^3$  and 18 exceedances for annual mean and number of hours respectively.

We encourage the Mayor to request that the London Air Quality Network consider showing on its excellent website current air pollution levels in  $\mu\text{g}/\text{m}^3$  rather than parts per billion (ppb) (to make the information more immediately understandable by the lay reader) and using graduated colour coding for air pollution levels based on WHO recommended standards rather showing “Green” up to the maximum levels recommended by the WHO for NO<sub>2</sub> and PM<sub>10</sub>.

Note: The top five worst boroughs by number of people expected to be exposed to excess NO<sub>2</sub> air pollution in 2008 are Westminster (176,042), Kensington and Chelsea (148,648), Camden (110,124), Islington (92,775) and Southwark (89,936).

**Table 2: Base Case numbers of people expected to be exposed to levels of NO<sub>2</sub> and PM<sub>10</sub> exceeding air pollution objectives in the January and November consultation documents**

	TfL Consultation in January 2006			TfL Consultation in November 2006		
	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>10</sub>	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>10</sub>
	Number of people in area exceeding			Number of people in area exceeding		
	Annual mean of $40 \mu\text{g}/\text{m}^3$	Annual mean of $23 \mu\text{g}/\text{m}^3$	35 days per annum over $50 \mu\text{g}/\text{m}^3$	Annual mean of $40 \mu\text{g}/\text{m}^3$	Annual mean of $23 \mu\text{g}/\text{m}^3$	35 days per annum over $50 \mu\text{g}/\text{m}^3$
Base Case 2005	N/A	N/A	N/A	1,930,000	1,392,000	32,000
Base Case 2008	<b>626,800</b>	717,400	24,300	<b>1,370,000</b>	495,000	14,000
Base Case 2010	<b>193,700</b>	253,500	216,400	<b>707,000</b>	159,000	102,000
Base Case 2012	N/A	N/A	N/A	<b>625,000</b>	96,000	52,000
Base Case 2015	N/A	N/A	N/A	443,000	46,000	27,000

The above details have been taken directly from Annex A on page 29 of Supplementary Information and Annex A on page 45 of the Scheme Description and Supplementary Information published in January and November 2006 respectively. For the latter, please see:

<http://www.tfl.gov.uk/roadusers/lez/17827.aspx#tk-tab-panel-1>

**Question 1: Why are nearly three-quarters of a million more Londoners now expected to be exposed to unhealthy levels of NO<sub>2</sub> in the LEZ Base Case for 2008?**

**2. EU legal limits and WHO recommended standards for NO<sub>2</sub> are not being given the same priority as the same limits and standards for PM<sub>10</sub> despite the differences.**

We acknowledge the deadly dangers of PM<sub>10</sub> but NO<sub>2</sub> is the other most dangerous air pollutant facing Londoners. Furthermore, one of the main reasons that strict legal standards are set for NO<sub>2</sub> air pollution is that, apart from its own toxic properties, it is a proxy for many other dangerous air pollutants that occur with it – i.e. the so-called nitrogen oxides (NO<sub>x</sub>) that are generated by traffic fumes. NO<sub>2</sub> is particularly dangerous for the old and the young.

The United States' Environmental Protection Agency website lists the Health and Environmental Impacts of NO<sub>x</sub> as including:

- (i) Ground Level Ozone (Smog)
- (ii) Acid Rain
- (iii) Particles (i.e. particulate matter)
- (iv) Water Quality Deterioration
- (v) Climate Change
- (vi) Toxic Chemicals
- (vii) Visibility Impairment

Of these, Ground Level Ozone (Smog) is formed when NO<sub>x</sub> and volatile organic compounds react in the presence of sunlight. Children, people with lung diseases such as asthma and people who work or exercise outside are susceptible to adverse effects such as damage to lung tissue and reduction in lung function. Particles are created when NO<sub>x</sub> reacts with ammonia, moisture and other compounds to form nitric acid and related particles. Human health concerns include effects on breathing and the respiratory system, damage to lung tissue and premature death. Toxic Chemicals are created in the air when NO<sub>x</sub> reacts readily with common organic chemicals and even ozone to form a wide variety of toxic products, some of which may cause biological mutations (examples include the nitrate radical, nitroarenes and nitrosamines).

We were concerned to read in the consultation's Environment Report (in paragraph 7.7.2 on page 54) that "The only *potential* negative air quality impact of the LEZ would be an increase in the proportion of primary NO<sub>2</sub> emissions. The precise reasons are not fully understood but it is thought to be linked to the greater number of diesel-engined vehicles and the fitting of some types of particulate traps that generate NO<sub>2</sub> as part of the cleaning process". There is no excuse for creating the impression that this is a new problem or implying that it might be an excuse for failing to meet air pollution objectives: this effect was clearly anticipated by experts acting for the Department of Environment, Food and Rural Affairs (Defra) by 19 May 2003 when it was referred to in a draft Air Quality Expert Group (AQEG) report.

We are concerned greatly that "There are no plans to extend the emission standards of the LEZ to include emissions of oxides of nitrogen (NO<sub>x</sub>) at this stage; however TfL is continuing to consider how a NO<sub>x</sub> standard might be implemented and could consider moving to implement a NO<sub>x</sub> standard in future should this become feasible" (page 8 of the Sustainable Development Impact

Assessment). The same report says on page 9 that Euro IV standards for vehicles are known already to emit 30% less NO<sub>x</sub> than the Euro III standard (and they are already being sold in Europe). It is vital that Euro IV/4 standards are introduced quickly.

**Question 2: Why are EU legal limits and WHO recommended standards for NO<sub>2</sub> air quality standards not being met urgently when it is a toxic gas and a strong indicator of the presence of many other dangerous air pollutants?**

**3. The proposed benefits of the LEZ are less now than they were in early 2006.**

In the simplest overall terms, the November 2006 version of the LEZ is expected to achieve by 2010 a 4.6% reduction in NO<sub>2</sub> exposure and a 7.8% and 7.6% reduction in PM<sub>10</sub> exposure compared to 11.1%, 18.8% and 17.5% reductions respectively in the January 2006 version of the LEZ (although we note that fewer people are now expected to be exposed to PM<sub>10</sub>).

Furthermore, it is most concerning, for example, that the LEZ is expected to result in the proportion of the population exposed to NO<sub>2</sub> in the Camden, City of London, Islington, Kensington and Chelsea, Southwark and Westminster boroughs being reduced by only 7.3%, 0.0%, 9.5%, 4.9%, 9.0% and 2.2% respectively. The picture for those exposed to PM<sub>10</sub> in those same boroughs is only marginally better.

**Table 3: Proportion of borough population in exceedance areas pre-LEZ and post possible LEZ introduction in 2008 in worst five boroughs plus the worst in % age terms**

	Annual mean NO <sub>2</sub> > 40 µg/m <sup>3</sup> (i.e. WHO limit)		Annual mean PM <sub>10</sub> >		No. of days > 50 µg/m <sup>3</sup> daily mean PM <sub>10</sub>	
	Population exposed and % exposure	% reduction in exposure	Population exposed and % exposure	% reduction in exposure	Population exposed and % exposure	% reduction in exposure
Camden*	110,124 53.5	7.3	42,512 20.6	<b>5.4</b>	22,337 10.8	<b>3.3</b>
City of London**	7,448 100.0	<b>0.0</b>	3,712 49.8	<b>4.0</b>	2,581 34.6	10.5
Islington*	92,775 50.7	9.5	20,700 11.3	7.0	11,242 6.1	5.2
Kensington and Chelsea*	148,648 89.9	<b>4.9</b>	38,490 23.3	<b>3.7</b>	26,010 15.7	<b>2.6</b>
Southwark*	89,936 35.3	9.0	32,111 12.6	6.0	17,508 6.9	<b>4.2</b>
Westminster*	176,042 93.4	<b>2.2</b>	72,939 38.7	5.7	39,394 20.9	6.4

\* The five London boroughs with the largest population number exposed to air pollution out of 33 boroughs

\*\* The only London borough with 100% of its population exposed to NO<sub>2</sub> air pollution

For complete data please refer to Table 5.14 on page 60 of the LEZ Health Impact assessment

Final Report. See:

<http://www.tfl.gov.uk/assets/downloads/roadusers/lez/LEZ-Health-Impact-Assessment- November-2006.pdf>

We note that the consultation's Health Impact Assessment estimates (on page 35 of the Scheme Description and Supplementary Information) that the LEZ would, between 2005 and 2015, prevent between roughly 40 deaths brought forward (under the Defra methodology) and 210 premature deaths (under the CAFÉ methodology). This compares with over 1,000 people a year who are estimated by the Mayor to have died in London in 2005 from PM<sub>10</sub> alone.

**Question 3: Why is it the LEZ scheme not much more ambitious, effective and well thought through?**

4. **The latest proposal for the LEZ does not adequately address the major changes that have taken place in the external environment since the first LEZ consultation was launched in January 2006.**

A great deal has changed in the world since the LEZ was first proposed for consultation in January 2006:

- (i) like many others, Londoners are now worried greatly about the consequences of climate change;
- (ii) concern has been mounting about London's general readiness to host the 2012 Olympics (with obligations, as a modern western city, to demonstrate and deliver by then WHO recommended levels of air quality throughout the capital);
- (iii) there is a clear realisation that the public wants tough action from politicians on green issues;
- (iv) Sir Nicholas Stern has published his excellent report which makes clear that an upfront and ongoing cost is in all our best long term interests to address climate change (with the need to treat air pollution holistically as part of this challenge being highlighted on pages 276 to 278 of Chapter 12 of his report);
- (v) the Mayor has joined the Friends of the Earth's "Big Ask" campaign calling for Government action on climate change with annual targets and independent review; and
- (vi) there is genuine concern that London will lose its "agglomeration benefits" if it is seen, like Hong Kong, as being an unhealthy place to live in (and bearing in mind that such expectations are high in western Europe).

and yet the LEZ scheme has become less ambitious not more so in the same period (e.g. in terms of delaying by two years the introduction of Euro IV standards for PM<sub>10</sub> and dropping Euro IV standards for NO<sub>x</sub> completely).

**Question 4: Why have the latest proposals for the LEZ not taken account of the major changes that have taken place in the external environment since the first LEZ consultation?**

5. **The consultation documents make clear that the proposed LEZ will have a "negligible" impact on climate change and no "significant impacts on traffic levels or congestion".**

The consultation documents make clear that the proposed LEZ will have a “negligible” impact on climate change and no “significant impacts on traffic levels or congestion” (see paragraph 13.7.1 on page 100 of the Environmental Report and page 37 of Scheme Description and Supplementary Information respectively). As shown above, it will also have either no or negligible impact on air quality in major parts of London that are currently suffering from air quality well below standards recommended by the WHO and in current and forthcoming EU legal limits.

**Question 5: Why is the opportunity not being taken to introduce a much more ambitious LEZ scheme that would have a major positive impact on air quality and simultaneously deter non-compliant vehicles from entering London?**

- 6. Costs are higher than they would have been if action had been taken as soon as 1999 air pollution legislation was published and will increase sharply if tough action is delayed.**

The longer that decisive action is delayed, as the EU air pollution deadlines approach and public concern about this issue gathers momentum, the more it will cost to meet EU legal limits and Londoner’s expectations and protect London’s “agglomeration benefits” at short notice. Such cost escalation is already, and will continue to be, caused by those responsible for addressing these problems not those highlighting legal obligations that have been in place since 1999.

There are large and real “agglomeration benefits” for London as a major national and international centre. Crucial to achieving these benefits is the need to persuade people that they should live in, work in and visit London. As the United Kingdom’s capital city, these benefits are likely to be “first order” in terms of economic scale. The costs described in the TfL consultation document are likely to be “second order” and short term restructuring benefits necessary to achieve for a greener, more sustainable economy in London with the bulk of those costs passed on directly or indirectly to those enjoying the benefits of a healthier London.

As far as we are aware, no assessment of the economic impact of the LEZ on London and the UK economy was undertaken and included in the 30 January 2006 consultation document (reference paragraph 4.4.3.3 on page 27). The current consultation estimates, in the Economic and Business Impact Assessment report (Table 9.6 on page 98), that the total direct cost of the scheme will be between £300 million and £470 million, including a capital cost of about £100 million, with broadly commensurate benefits. See:

<http://www.tfl.gov.uk/assets/downloads/roadusers/lez/economic-impact-assessment.pdf>

We note that “UK households are expected to incur the bulk of the costs that get passed down through higher transport costs or product prices” and that these are expected to “constitute a negligible proportion of household spending” (page 99 of the Economic and Business Impact Assessment report).

There is no evidence that the competitiveness of London will be adversely affected by this LEZ (or a much more ambitious one). On the contrary, a London known for having one of the worst air pollution records in Europe is likely to lose the crucial “agglomeration benefits” that can come from establishing London as the “New York” of Europe. There is every likelihood that the necessary short term costs of restructuring the London economy, to create a greener and most

sustainable economy will be dwarfed by the agglomeration and other financial and social benefits lost through inaction or delayed action.

Unless the Mayor (or the Department for Environment, Food and Rural Affairs) is hoping already to be given lengthy time extensions from complying with EU legal limits for NO<sub>2</sub> in January 2010 and PM<sub>10</sub> earlier, the costs of complying with those limits will rise sharply the longer the delay in tackling them seriously. Businesses and other vehicle owners will not thank TfL or the Mayor for introducing a weak LEZ scheme now and then making them suffer suddenly much tougher obligations in 12 or 24 months time.

The Knightsbridge Association supports all reasonable measures that the Mayor and HM Government may need to take to meet WHO recommended standards of air quality throughout London by the earliest dates for compliance currently in legislation e.g. for NO<sub>2</sub> by January 2010 (noting that this date has been in legislation since 1999). Of course, the widespread breaches of PM<sub>10</sub> legal limits in London in 2005 must also be addressed urgently.

**Question 6: Why is action to tackle adequately air pollution being delayed when: (i) over 1,000 people a year are dying early from one form of air pollution alone in London (PM<sub>10</sub>); (ii) agglomeration benefits will be lost to London through delay; (iii) the consultation documents make clear that the costs of the scheme will be passed on to households (and will be “negligible”) along with those who work in London who would be the key beneficiaries of the healthier environment; and (iv) businesses, residents and others will have to suffer necessarily much tougher obligations at short notice later?**

### Online Questionnaire for Members of the Public

Please see the Appendix to this letter which shows the response we have submitted online to TfL’s questionnaire on the LEZ (see <http://www.tfl.gov.uk/tfl/low-emission-zone/public-questionnaire.asp>). This letter and its attachments and the online submission all form part of The Knightsbridge Association’s response to the Consultation and should be treated please as one overall submission.

Separately, we record here our support for: ensuring that all Buses and Taxis should meet standards comparable or exceeding the proposed LEZ emission standards at each comparable stage for vehicles producing similar levels of air pollution; UK and non-UK registered vehicles both being included in the scheme; a 24 hour a day, 365 days a year scheme; and including the motorways within the final area defined for the LEZ.

### Next steps

Fresh thinking is needed urgently. In the view of The Knightsbridge Association, the LEZ should go much further, much faster to improve air quality in London if it is to make the most of the opportunity it creates. We encourage you strongly, therefore, to amend the scheme to tackle more ambitiously all sources that contribute significantly to either NO<sub>2</sub> or PM<sub>2.5</sub> so that WHO recommended standards of air quality will be achieved throughout London by January 2010 (or earlier) as has been expected in legislation since 1999. Have TfL and the Mayor considered the feasibility and potential impact of the following possible measures:

- (i) tackling the quantity of emissions from motorised vehicles as well as their quality through the LEZ scheme e.g. in relative and/or absolute terms similar to the “differential taxation” plan currently being considered for Band G vehicles in the Congestion Zone. Would such “differential taxation” be a workable, much quicker plan as part of the LEZ ahead of full road pricing in London?;
- (ii) including all public, private and commercial motorised vehicles within the LEZ scheme with the worst polluting vehicles being banned (and/or banning “through traffic”)?;
- (iii) pressing for the introduction of Euro IV/4 standards, which cut out much NO<sub>x</sub> and (on diesels) particulates and which is already available in Europe, sooner rather than later (the current LEZ proposal to introduce Euro IV standards for HGV’s, buses, coaches and heavier LGV’s by January 2012 with no planned date for Euro 4 for smaller vehicles seems unambitious against a background of worsening air pollution)?;
- (iv) discussing with fleet operators how shorter fleet renewal cycle’s could be achieved e.g. through non-financial incentives such as allowing vehicles meeting the latest Euro standard only (currently Euro IV/4) to use half of current loading bays or allowing them extended loading and unloading times. Have TfL and the Mayor considered offering priority parking for smaller vehicles meeting the latest available Euro standard?;
- (v) the early implementation of road pricing (or an inner LEZ zone) in the six London boroughs with the most people exposed to NO<sub>2</sub> above WHO recommended levels?;
- (vi) pressing HM Government to incentivise the early purchase of Euro IV/4 standard vehicles and for the early release of Euro V/5 standard vehicles and NO<sub>2</sub> abatement technology linked to measures then such as in (iv) above. (Note, it is unclear from the consultation documents whether Euro IV/4 standard vehicles are widely available yet in the UK even though they are available in Europe as a whole)?;
- (vii) tough enforcement measures such as roadside checks and MOT standards?; and
- (viii) pressing for national action on air pollution and a tough EU and UK wide legislative framework that will encourage a level playing field across the UK and Europe?

The Knightsbridge Association would be pleased to give a firm view on the acceptability or otherwise of any or all the above possible measures as part of any further formal public consultation on the LEZ and its successors undertaken by TfL provided that such consultation assesses their full impact.

**Question 7: Do TfL and the Mayor consider that the introduction of the LEZ, together with any other measures announced or being planned, will mean that London is taking all reasonable efforts to achieve current EU legal limits for NO<sub>2</sub> air pollution throughout London by January 2010 (as would be required to justify any time extension from meeting EU legal limit obligations for NO<sub>2</sub> air quality in January 2010)?**

**Question 8: Please treat as a Freedom of Information request, a request here from us for any information held by the Greater London Authority (GLA) or any of its associated entities about any plans or action taken or intended to be taken to seek time extensions or derogations in respect of breaches of EU legal limits for PM<sub>10</sub> in London in 2005 either by the GLA, Defra or others.**

In our view, TfL and the Mayor should undertake urgently either a further consultation with more ambitious proposals (entailing perhaps a modest delay in the commencement of the LEZ) or to launch a separate consultation with more ambitious additional measures in parallel with the planned

implementation of this scheme in order to achieve much greater benefits much sooner. We are content to let you choose which measure has the greatest certainty of achieving rapidly the greatest overall package of benefits.

Please see also our website:

[www.cleanairinlondon.org](http://www.cleanairinlondon.org)

This letter has been published today on the BBC Action Network as an “Article” under the “Air pollution” issues section and elsewhere on that site.

We attach as part of this letter an Appendix titled: Low Emission Zone Consultation with our response submitted online and by email various other letters submitted or previously copied to the Mayor by The Knightsbridge Association on the subject of air quality all of which should be considered to form part of this response and vice versa.

Finally, thank you sincerely for taking seriously our concerns about air pollution in London and giving the issues we raise your particular attention. We recognise that you are already taking many steps to improve air quality in London.

We look forward to hearing from you.

With best wishes.

Yours sincerely,

Simon Birkett  
Chair  
Transport and Environment Committee  
The Knightsbridge Association

and on behalf of the Campaign for Clean Air in London

Enclosures by email:

Cross-party Pledge letter to the Mayor dated 5 January 2007  
London Plan letter to the Mayor dated 3 December 2006  
Letters to the Secretary of State, Defra, dated 25 June, 29 October and 12 November 2006  
Letter to the Mayor dated 9 April 2006

By hand to:  
Winston Fletcher, Chairman, The Knightsbridge Association  
Carol Seymour-Newton, Honorary Secretary, The Knightsbridge Association

**Note: Those invited to Pledge support for the Campaign for Clean Air in London are asterisked “\*” below. Those highlighted in bold and with a “+” have given Pledges as early supporters**

CC:

- \* The Rt. Hon. Tony Blair MP, Prime Minister
- \* The Rt. Hon. David Miliband MP, Secretary of State for Defra
- Stavros Dimas, Commissioner for the Environment DG
- Marianne Klingbeil, Head of Unit, Env. C. 3 – Clean Air & Transport
- Dr Martin Williams, Head of Air and Environment Quality Division, Defra

#### **PARTY PLEDGES GIVEN (BOLD) OR SOUGHT (ASTERISKED)**

- \* Conservative Party: Greater London Authority; Nationally; MEPs
- \* Green Party: Greater London Authority; Nationally; MEPs
- \* Labour Party: Greater London Authority; Nationally; MEPs
- \* Liberal Democrat Party: Greater London Authority; Nationally; MEPs

#### **ORGANISATIONS**

Amenity Societies, Business Groups and Media Organisations  
Jenny Bates, London Regional Campaigns Co-ordinator, Friends of the Earth  
James Bidwell, Chief Executive, Visit London  
John Brewster OBE, Chairman, Port Health and Environmental Services Committee, Corporation of London  
Patricia Brown, Chief Executive, Central London Partnership  
Gary Fuller, King’s College London  
Rachel Goodison, Executive Director, London First  
Tim Hockney, Executive Director, London First  
Sir Roy McNulty, Chairman, Olympic Delivery Authority  
Derek Picot, Chairman, The Knightsbridge Business Group

#### **PERSONAL PLEDGES GIVEN (BOLD) OR SOUGHT (ASTERISKED)**

- \* Peter Ainsworth MP, Shadow Secretary of State, Defra, Conservative
- The Rt. Hon. Douglas Alexander MP, Secretary of State, Department for Transport, Labour
- \* Greg Barker MP, Shadow Minister for the Environment, Conservative
- \* Ben Bradshaw MP, Minister for Air Quality, Labour
- Alistair Carmichael MP, Shadow Transport Secretary, Liberal Democrat
- Mrs Gwyneth Dunwoody MP, Chairman of the Transport Committee, Labour
- + **Mark Field MP, Conservative**
- Chris Grayling MP, Shadow Secretary of State for Transport, Conservative
- \* Chris Huhne MP, Shadow Environment Secretary, Liberal Democrat
- \* Ian Pearson MP, Defra, Minister for Climate Change, Labour
- \* The Rt. Hon. Sir Malcolm Rifkind QC MP, Conservative
- Tim Yeo MP, Chairman Environmental Audit Committee, Conservative
- \* Gerard Batten MEP, London, Independence
- \* John Bowis MEP, London, Conservative
- Chris Davies MEP, Liberal Democrat
- \* Robert Evans MEP, London, Labour
- \* Mary Honeyball MEP, London, Labour
- \* Syed Kamall MEP, London, Conservative

- \* Ms Jean Lambert MEP, London, Green Party
- \* Baroness Ludford MEP, London, Liberal Democrat
- Linda McAvan MEP, Labour
- \* Claude Moraes MEP, London, Labour
- \* Charles Tannock MEP, London, Conservative
- \* Sian Berry, Principal Speaker, Green
- + **Angie Bray AM, Leader of the Conservative Party, GLA**
- \* Tony Arbour AM, Conservative
- \* Richard Barnes AM, Conservative
- \* Robert Blackman AM, Conservative
- \* Brian Coleman AM, Conservative
- \* Roger Evans AM, Conservative
- \* Elizabeth Howlett AM, Conservative
- \* Bob Neill AM, Conservative
- \* Andrew Pelling AM, Conservative
- \* Jenny Jones AM, Leader of the Green Party, GLA
- + **Darren Johnson AM, Chair of the Environment Committee, GLA, Green**
- \* Len Duvall AM, Leader of the Labour Party
- \* Jeanette Arnold AM, Labour
- \* John Biggs AM, Labour
- \* Nicky Gavron AM, Labour
- \* Joanne McCartney AM, Labour
- \* Valerie Shawcross AM, Labour
- \* Murad Qureshi AM, Labour
- \* Mike Tuffrey AM, Leader of the Liberal Democrat Group, GLA
- \* Dee Doocey AM, Liberal Democrat
- \* Sally Hamwee AM, Liberal Democrat
- \* Geoff Pope AM, Liberal Democrat
- \* The Lord Tope, AM, Liberal Democrat
- \* Peter Hulme Cross AM, One London Group, GLA
- \* Damien Hockney AM, One London Group, GLA
- \* Councillor Sir Simon Milton, Leader of the Council, WCC, Conservative
- \* Councillor Alan Bradley, Chair, Go Green Board, WCC, Conservative
- \* Councillor Merrick Cockell, Leader of the Council, RBKC, Conservative
- \* Councillor Daniel Moylan, Deputy Leader, RBKC, Conservative
- \* Councillor Frances Blois, WCC, Conservative
- \* Councillor Tony Devenish, WCC, Conservative
- \* Councillor Philippa Roe, WCC, Conservative
- \* Councillor Dr Iain Hanham, RBKC, Conservative
- \* Councillor Margot James, RBKC, Conservative
- \* Councillor Mrs Shireen Ritchie, RBKC, Conservative

#### **LOCAL GOVERNMENT OFFICIALS**

Guy Denington, Team Manager, Environment Quality Unit, RBKC Sarah Legge, GLA Principal Policy Adviser – Air Quality

Martin Low, Director of Transportation, WCC Mike Le Roy, WCC

Mahmood Siddiqi, Chief Traffic Engineer, RBKC

#### **APPENDIX: LOW EMISSION ZONE CONSULTATION**

**Response from The Knightsbridge Association to the LEZ Questionnaire for Members of the Public (to be read in conjunction with our letter to the Mayor dated 13 January) See:**

*Link no Longer Available*

**General Questions**

1. Very important
2. Support. *Note: we consider that the scheme is not ambitious enough*

**Questions about the Low Emission Zone proposal**

3. Other. *See 4. below*
4. The LEZ area should give priority to the parts of London where air quality does not meet WHO recommended standards so that the standards are achieved urgently throughout London. Then it should address other parts of London subject to a sensible boundary
5. Yes. *Subject to 3. above*
6. No, too low. *We would rather that non-compliant vehicles were banned completely. If not, the charge should be set high enough (say £500 and £250 respectively) to deter occasional users from entering the zone (e.g. heavily polluting vehicles not registered in the UK).*
7. No, too low. *We would rather that non-compliant vehicles were banned completely. If not, to be an effective deterrent, the penalties should be say £1,500 (reduced to £1,000 if paid within 14 days) and say £750 (reduced to £500 if paid within 14 days) respectively with effective enforcement*
8. Strongly Support
9. No, too lenient
10. No, too lenient
11. No, too lenient
12. *Leave blank*
13. Tick nine boxes: Lorries (HGVs); Buses; Coaches; All LGVs; Minibuses; SUV's; Diesel cars; Petrol cars; and Motor cycles.
14. Strongly Oppose (*see 15 below*)
15. No objection to military or historic vehicles being exempt from the scheme. However, construction vehicles of all sorts should not be exempt; they should be incentivised to become compliant in the same way as everyone else
16. **This response is submitted on behalf of The Knightsbridge Association, and on behalf of the Campaign for Clean Air in London, and should be read in conjunction with its letter to the Mayor about the LEZ dated 13 January 2007**

**Questions about you**

17. SW7
18. *Not applicable. Responding on behalf of around 1,000 residents and businesses living or doing business between Hyde Park Corner and Queen's Gate in Central London*
19. *Not applicable. Responding on behalf of around 1,000 residents and businesses living or doing business between Hyde Park Corner and Queen's Gate in Central London*
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