

Draft and without prejudice 270611

Clean Air Zone for London (for the Olympics with a valuable legacy thereafter)

Many problems to resolve

1. Health – Link between traffic-related air pollution and new cases of asthma in children. 15,800 cardiovascular deaths in London in 2009 at an average additional loss of life of three years each
2. Legal – Need margin of safety to comply fully with PM₁₀ daily limit value (and support time extension re-re-application). PM₁₀ breach by Easter 2012? NO₂ infraction action likely by early 2012
3. Olympics – Olympic Transport Plan remains vulnerable to judicial challenge. Requirement to reduce background traffic by 30% to avoid Olympic Route Network gridlock. Use: Big Scare (but this ‘cat is out of the bag’); last minute odd and even number plate ban (6 May 2012?); or a Clean Air Zone?
4. Queen’s Diamond Jubilee celebrations from 2-5 June 2012. Paralympics ends 14 September 2012

What would the solution(s) look like?

5. Address the above problems
6. Apply the ‘polluter pays’ principle when choosing which vehicles to target i.e. ban the most polluting vehicles (i.e. oldest diesel) from the most polluted parts (of central and inner London)
7. Minimise inputs (costs) and maximise outputs (reduced air pollution and traffic; legal compliance)
8. ‘Structurally’ reduce traffic volumes to ensure the outcome is predictable and ‘testable’
9. Offer a legacy after the London 2012 Olympics

The solution: a Clean Air Zone

10. Berlin-style inner low emission zone(s) for London (a ‘Clean Air Zone’):
 - What? In principle, ban all pre-Euro 4 diesel and pre-Euro 2 petrol (per Carslaw et al, 2011) vehicles. Note: approximately 30% of all vehicles in London are pre-Euro 4 diesel so there is scope for dispensations e.g. some residents within the zone (provided it is combined with other Olympic Deliver Authority and TfL planned traffic reduction measures)
 - Who? Allow pre-Euro 4 taxis to drop off within the zone but not pick up
 - Where? Areas: bounded by north/south circular roads; and around Heathrow airport
 - When? 7 May 2012 (i.e. Bank Holiday Monday) to 30 September (or 31 December) 2012
 - How? A (green or 2012?) ‘greenest Games ever’ sticker on windscreens of eligible (incl. special dispensation) vehicles. Signage around the north/south circular. One point on driving licence and £100 fine if caught (e.g. by parking warden or police) driving within the zone
11. Legacy:
 - From 1 October 2012 the area is reduced to the Central Congestion Charging Zone
 - From 1 January 2014 it applies again to the wider areas (i.e. north/south circular; Heathrow) to aid compliance with NO₂ limit values by 1 January 2015 (tightening to Euro 3 petrol)
 - Similar scheme could be applied nationally

12. Process:

- 31 July 2011: Mayor launches six week consultation
- 30 September 2011: Decision? Note: this aligns with NO₂ time extension application
- 30 April 2012: mechanism in place

13. Analysis:

- TfL admits such a mechanism would be ‘quick and inexpensive to implement’ although they would like a national framework. TfL’s report is attached (see page 3)
- City of London analysis shows (page 10) increased margin of safety for PM₁₀ daily limit even along the most polluted road (i.e. Upper Thames Street)

Note 1: see 12 MB report http://www.cityoflondon.gov.uk/NR/rdonlyres/2F702BD9-E69E-4DA2-BF79-02F80D75FA66/0/HS_EH_FM863_Sc2_15June11.pdf

Note 2: annual mean of 31.5 µg/m³ is taken by Defra to align with the PM₁₀ daily limit value

Note 3: City of London report shows Euro 6 by 2015 would achieve full compliance with NO₂ limit values by 2015 (with the single exception of Upper Thames Street/Walbrook Wharf which would require one or more other measures). Remember the Mayor’s list of 14 other measures that should be taken by 2015 to ensure compliance with the NO₂ limit values i.e. implement many or all the other measures by 2015 and Euro 6 might be delayed

14. Government:

- Approves and/or sets the windscreen sticker standard (if TfL will not do so)
- Facilitates one point penalty on driving licence (i.e. like Berlin)
- Handles the administration of windscreen sticker allocation (if TfL will not do so)
- Offers scrappage and retrofit options to those affected

15. Mayor/TfL:

- Undertakes the consultation and puts a fining mechanism in place
- Signage at the north/south circular
- Offers scrappage and retrofit options to those affected

16. ODA:

- Amends the Olympic Transport Plan to include the above and ensure it complies fully with all legal and other requirements

The opportunities

17. Delivers the ‘greenest Games ever’. Decisive action by Government to avoid London 2012 chaos
18. Comply with health-based air quality laws and the Host City Contract...
19. Reduce traffic volumes by a certain and required amount to ensure that the Olympic Route Network operates smoothly i.e. 30%. Encourages non-London drivers to use public transport for the Games
20. Showcases in 2012 what London will look like in 2014/15
21. Uses the ‘polluter pays’ mechanism so that cleaner vehicles do not have to share equally in avoiding chaos and protecting public health. Reduces harmful emissions near schools and other locations
22. Reduces carbon dioxide and black soot (a short term climate forcer)
23. Small inputs for maximum and predictable outputs
24. Responds to London Assembly and other concerns
25. TfL could turn it into a number plate recognition scheme from 1 October 2012 if they so wish
26. Basis for nationwide scheme in 2013 to include NO₂ by 2014/5 (e.g. Euro 6)