

Sadiq Khan  
Mayor of London and Chair of Transport for London  
City Hall  
The Queen's Walk  
London SE1 2AA

By email

18 December 2016

Dear Sadiq

**How and when will you keep your manifesto pledge to restore London's air quality to 'legal and safe' levels if you don't ban diesel? It's mathematically impossible to do it any other way**

**Many roads in central London will tend to have the highest concentrations of nitrogen dioxide (NO<sub>2</sub>) in the world as a result of diesel vehicles emitting 90-95% of the most harmful exhaust emissions including NO<sub>2</sub>. Worse, levels of NO<sub>2</sub> are higher this year than last in some hotspots**

**'Clean Air in London' estimates there were about 3,000 deaths attributable to long-term exposure to fine particles (PM<sub>2.5</sub>) in London in 2015 and up to 5,900 deaths attributable to other pollutants (including NO<sub>2</sub>) and timescales with an uncertain degree of overlap. These statistical estimates are consistent with an average loss of life of 11.5 years. The real impact of air pollution is likely to be many more deaths with an average loss of life of two to three years at typical ages**

**London should lead world cities, not follow them, by adopting the Sustainable Development Goals as a framework to set more ambitious quantitative targets. These goals must include full compliance with World Health Organisation guidelines for air quality and Science Based Targets to reduce greenhouse gases consistent with the 1.5°c ambition in the Paris Agreement**

Thank you for the opportunity for Clean Air in London (CAL) to respond to the consultation on your latest proposals to improve air quality including a new 'Emissions Surcharge' (T-Charge) and improving the Ultra Low Emission Zone (ULEZ) i.e. sooner and bigger sooner.

<https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/>

## Summary

More than six months after your election it is vital that you set an ambitious agenda for London to lead the world in achieving clean air.

The Agenda for Sustainable Development (Agenda 2030) offers the best opportunity to align global efforts to achieve a better future for people and the environment everywhere. But the formal goals and targets alone for air quality and climate will achieve nothing to mitigate these problems.

Instead, the Sustainable Development Goals (SDGs) should be seen as providing a strategic opportunity for environmental policy to contribute to transformative processes as well as a support mechanism for strengthening adaptive capacities and resilience within societies on all levels. Operationalising the SDGs will require ambitious quantitative targets and indicators so that progress towards sustainability can be tracked properly to ensure convergence on a shared global vision and ambition within planetary boundaries.

Please therefore put London on a path to eliminate all fossil fuel burning by 2030 and rely only on truly renewable energy. Your first step must involve banning diesel from the most polluted places in London by January 2020 (with an intermediate step by January 2018) and throughout London by January 2024, which would be towards the end of your second Mayoral term if you are re-elected. These outcomes should be achieved by making the ULEZ bigger, stronger and smarter sooner through 'Emissions Based Road Charging' (EBRC) and phased bans:

<http://cleanair.london/sources/emissions-based-road-charging-by-2018-and-paid-to-walk-or-cycle-by-2020/>

Private hire vehicles should pay all emission and congestion charges if they don't comply and there should be no discounts for residents or others. Petrol also needs to be phased out.

### **Sustainable Development Goals**

Agenda 2030 offers the best opportunity to align global efforts to achieve a better future for people and the environment everywhere. Please see our submission to the Environmental Audit Committee's inquiry into the Sustainable Development Goals in the UK dated 16 September 2016:

<http://cleanair.london/cal/world-cities-must-lead-on-sustainable-development-goals-and-agenda-2030/>

There are warning signs that this opportunity will be missed because many Member States, including the UK, are reluctant to implement, monitor and report on the 17 SDGs. But even if the SDGs are implemented successfully, the three targets mentioning air quality will do nothing to improve air quality in cities (or combat climate change and its impacts). These are:

#### **Goal 3: Target 3.9**

By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.

#### **Goal 11: Target 11.6**

By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.

#### **Goal 12: Target 12.4**

By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and

significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment.

**Goal 13** on climate change is similarly vague and lacks any objective emissions target:

**Take urgent action to combat climate change and its impacts.**

The air quality and climate change targets are in stark contrast to **Goal 3, Target 3.6** which is:

By 2020, halve the number of global deaths and injuries from road traffic accidents.

Regrettably, the targets for cleaner air are vague, lumped with other themes and/or unspecific. This may have been deliberate given that the SDGs were ‘agreed’ shortly before the vital negotiations leading up to the Paris Agreement. It is also an opportunity to improve them.

In this context, London should pledge to comply fully with World Health Organisation (WHO) guidelines for air quality and Science Based Targets (SBT) to achieve the most ambitious goals for greenhouse gas reductions set by the Paris Agreement. We must think ‘One atmosphere’ rather than repeat past failures, such as the myopic focus on carbon dioxide (CO<sub>2</sub>) reductions, that have given us diesel, wood burning and decentralised power generation in cities.

CAL urges you to lead the global agenda by implementing, monitoring and reporting meaningful indicators which will deliver on the spirit and letter of Agenda 2030. This must include the achievement of all current WHO guidelines for air quality throughout London by January 2020 and all new WHO guidelines, currently being updated by 2018, by January 2024 (with all other world cities to follow by 2030).

Mega cities like London and organisations such as C40 Cities must fill the void currently created by reluctant Members States and take a lead in implementing and achieving ambitious and meaningful targets within the SDG framework. Annual reporting of progress at a city or local level is essential.

## **Banning diesel**

You pledged in your Mayoral manifesto in May 2016 to:

*“Restore London’s air quality to legal and safe levels, with action to make travel greener and pedestrianise Oxford Street, while protecting the green belt.”*

[http://cleanair.london/wp-content/uploads/CAL-332\\_Sadiq\\_Khan\\_Manifesto-0316.pdf](http://cleanair.london/wp-content/uploads/CAL-332_Sadiq_Khan_Manifesto-0316.pdf)

King’s College London said:

<http://www.londonair.org.uk/london/asp/news.asp?NewsId=OxfordStHighNO2&StartIndex=31>

*“...there are reasons to believe many roads in central London will tend to have the highest NO<sub>2</sub> concentrations [in the world].”*

CAL's analysis of Transport for London (TfL) data found that diesel vehicles produce 90-95% of the most harmful exhaust emissions (24 June 2013):

<http://cleanair.london/sources/carcinogenic-diesel-exhaust-disclosed-for-every-significant-road-in-london/>

At the recent C40 Cities conference, the Mayors of Paris, Mexico City, Madrid and Athens pledged to ban diesel (2 December 2016)

[http://www.c40.org/press\\_releases/daring-cities-make-bold-air-quality-commitment-to-remove-all-diesel-vehicles-by-2025](http://www.c40.org/press_releases/daring-cities-make-bold-air-quality-commitment-to-remove-all-diesel-vehicles-by-2025)

*“Diesel vehicles will be removed from Paris, Mexico City, Madrid and Athens by 2025, as part of unprecedented effort by mayors to improve the quality of air for their citizens. These pioneering cities also pledged to incentivise alternative vehicles and promote walking and cycling infrastructure.”*

11 NGOs urged you to ban diesel in a letter dated 9 December 2016 as coal burning was banned so successfully exactly 60 years ago.

<http://cleanair.london/wp-content/uploads/CAL-341-Letter-to-Sadiq-Khan-091216.pdf>

*“We, the undersigned, call on you to join the leading C40 Cities in committing to a ban on diesel vehicles no later than 2025 to help clean up London's air.”*

That letter inevitably represented the lowest common denominator among those NGOs. CAL wants you to be more ambitious than the Mayors of four other cities by putting London on a path to eliminate all fossil fuel burning in London by 2030 and rely only on truly renewable energy.

These bans should be implemented through the same charging mechanism used for the current low emission zone i.e. £500 or £1,000 per day for older, larger non-compliant vehicles. See:

<https://tfl.gov.uk/modes/driving/low-emission-zone/penalty-charges?intcmp=2275>

Alternative banning mechanisms might include penalty points on driving licences, impounding non-compliant vehicles or jail for repeated offenders.

Your first step must be to ban diesel from the most polluted places in London by January 2020 (with an intermediate step by January 2018) and throughout London by January 2024, which would be towards the end of your second Mayoral term, if you are re-elected. Progressing the most ambitious version of your currently proposed measures must be no more than a first step on this path.

Yours sincerely

Simon Birkett  
Founder and Director