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Mayor of London
Greater London Authority
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By email: mayor@london.gov.uk

13 July 2008

Dear Mayor Johnson,

Proposals to improve London's air quality

You will be aware that the new European Union directive on ambient air quality and cleaner air for Europe (the new AQ Directive) requires sharp reductions in air pollution in London by January 2010.

In this context, it is time that you announced the measures that your administration will take to ensure that air quality laws will be complied with in London. It is not good enough, more than 10 months after you launched your campaign to become Mayor of London, that you have not announced a single, significant, new policy that will ensure London plays its part in ensuring that air quality laws will be complied with fully in London. Worse even than taking no action, you have acted seemingly to withdraw or 'threaten' existing air quality measures.

The purpose of this letter is to prompt you to take action to improve London's air quality.

Road transport causes all the breaches of air quality laws in London

The government has admitted that road transport is the cause of all the breaches of air quality laws in the United Kingdom (UK) with diesel emissions being by far the biggest single component. The solutions involve two overlapping 'circles' of measures – one for congestion and the other for emissions - that target the most polluted areas with technology-based solutions and create a 'tipping point' of behavioural change backed by awareness, persuasion, incentives and regulation (when necessary). Behavioural change offers the most cost effective solutions.

Proposals to reduce congestion

In the congestion 'circle', road pricing is essential, fair and much needed in areas like central and west London, to tackle congestion and 'make the polluters pay' since vehicles produce less than half as much air pollution once their speed reaches 30 kilometres per hour. **It should operate seven days per week in the most polluted areas. The Central and Western Extension of the Congestion Charging Zone (together the 'CCZ') should operate as two co-ordinated, independent, schemes** i.e. people should be charged to cross between zones and resident discounts in each should apply only for one of the two zones.

A fair policy would ensure that the 'polluters pay'. **Trucks and coaches should pay substantially**

more than cars. Why is it that the 'icon' of free markets, New York City, can propose a charge of \$21 for trucks and coaches (compared to \$8 for cars) while such vehicles in London can pay less than cars through a fleet discount mechanism? **Motorcycles should pay a modest amount, perhaps £4,** to drive in the CCZ since they are among the most polluting vehicles. The London Atmospheric Emissions Inventory (LAEI) Second Annual Report (for 2003 that was published in August 2006) estimated that motorcycles will generate some 19% of all fine particulate matter (PM_{2.5}) from road traffic in the most polluted areas in

2010 and much higher still proportions of other pollutants, such as benzene (87%), butadiene (65%), non-methane volatile organic compounds (65%) and methane (34%).

A 'tag and beacon' road pricing scheme should be offered in parallel with the current Congestion Charging Scheme so that vehicles that drive little and outside the times of congestion can register and pay nothing. If the government will not set inter-operability parameters for a national scheme, London must proceed on its own and blame the government for subsequent problems that arise for road users elsewhere in the UK.

The Campaign for Clean Air in London ('CCAL') urges you also to tackle other causes of congestion not least at weekends when it is particularly bad e.g. **by removing free parking at weekends in central London.** **You should also ensure that unnecessary roadworks and unnecessary closures of arterial roads are not allowed e.g. the frequent closure of South Carriage Drive in west London.** **The CCAL supports a 20 miles per hour speed limit in residential streets.**

Please ensure that any consultation or survey conducted about the future of the Western Extension to the Congestion Charging Zone (WECCZ) makes clear not only the substantial benefits that have arisen from this scheme (e.g. in terms of lower traffic volumes and reduced congestion) but also that, without effective road pricing, it is likely to be necessary to ban, by 2010, a much higher proportion of the most polluting vehicles from these areas than would otherwise be the case. As you know, the CCAL wrote to Commissioner Dimas (copying you) on 5 May 2008 pointing out that the removal of the WECCZ could breach Article 12 of the new AQ Directive. **You should decide now to keep and toughen the WECCZ.**

Proposals to reduce emissions

In the emissions 'circle', **we need urgently an additional, inner, Low Emission Zone (LEZ)** at least in central and west London to reduce harmful emissions. **This should require all diesel vehicles entering the zone to match Euro 4 engine emissions standards for both particulate matter and oxides of nitrogen by 2010.** **The CCAL supports requiring petrol engine vehicles to match at least Euro 3 engine emissions standards for both particulate matter and oxides of nitrogen by 2010** (since these vehicles are much less polluting than their diesel counterparts). An inner LEZ must include all vehicle categories to be 'fair and effective' e.g. motorcycles, cars, trucks and coaches. It will join dozens of similar schemes around Europe which target the most polluted areas of large cities. See: <http://www.lowemissionzones.eu/>. London's existing blunt, broad scheme is not enough on its own.

Please press the government to set urgently national standards for the abatement of emissions of oxides of nitrogen from older, particularly diesel, vehicles (to meet Euro 4 emission standards for diesel and Euro 3 emission standards for petrol) since these standards could then be adopted uniformly across the UK to address expected breaches of air quality laws for NO₂ in a number of

cities. If the government will not set such standards, London must proceed on its own and blame the government for subsequent problems that arise for road users elsewhere in the UK.

Emissions from taxis are estimated in the LAEI to cause some 37% of the most hazardous road transport emissions (exhaust PM_{2.5}) in the most polluted parts of London in 2010. The previous Mayor's Taxi Emissions Strategy expires this month with nothing to replace it. Instead of weakening controls on taxis as currently seems to be the case, **you should require all licensed taxis driving in the most polluted areas to meet Euro 4 emissions standards for particulate matter and oxides of nitrogen by 2010.** Taxi users should contribute financially to the necessary expense.

Please pursue vigorously other measures that might reduce vehicle emissions at source e.g. **technology solutions that can be retrofitted to vehicles to shut off engines when idling for more than a few seconds. Such an approach should be combined with action by local authorities to 'blitz' unnecessary engine idling.** The Royal Borough of Kensington and Chelsea commented in its Local Air Quality Management, Air Quality Action Plan Update 2008 that "in 2007 [its] enforcement officers attended 38 complaints and have warned drivers to switch off their engines and they have done so in every case". We have asked the City of Westminster whether it operates a similar scheme. Clearly, such action should be taken hundreds of times per annum, not just dozens of times, in each of the most polluted boroughs.

Other measures to improve London's air quality

As well as much needed road transport measures, it is essential that other actions are taken to improve air quality. These include:

- **Increasing public awareness** of the extent of air quality problems and their health impacts and helping people, through education, to understand the part they can play in improving air quality by the choices they make;
- **Encouraging modal shifts** to less and non-polluting modes of transport e.g. walking, cycling and public transport;
- **Encourage the take-up of more efficient domestic and other boilers;**
- **Reducing substantially the number of festival bonfires;** and
- **Ensuring compliance at least with the 'Best Practices Guidance: For the Control of Dust and Emissions from Construction and Demolition'.**

A broad, holistic strategy is needed now that will address fairly and effectively the actual underlying causes of London's air quality problems. Please 'aim ahead of climate change' and do not be a 'busy fool' who pursues a myriad of policies that achieve little or nothing.

Only the government and you have the resources necessary to determine the complete, necessary, package of measures and the time by which each element must be implemented to ensure that air quality laws will be complied with fully in London.

Take action now or others will soon force you to do so

There are clear environmental, social and economic reasons for improving the UK's air quality quickly. Despite this, you seem to have shown yourself unwilling, after 10 months, of mustering even the political will needed to tackle London's air quality problems. Do not listen to the same siren

voices that argued against the creation and enforcement of the Clean Air Act introduced in 1956. London needs a new approach from you, by the autumn of this year at the latest, that will give stakeholders of all types, whether from business, the non- governmental sector or citizens generally, the certainty and time necessary to play their full part in delivering the required changes in the most cost effective manner.

Failing urgent action by you, the Campaign for Clean Air in London shall have to urge: the European Commission to take robust action against the UK to defend World Health Organisation-based air quality laws; and the UK government to require you to take action.

I would be pleased to meet you to discuss these proposals. In any event, I look forward to hearing from you.

Yours sincerely

Simon Birkett

Principal Contact
Campaign for Clean Air in London

Cc:

Commissioner Dimas, Environment DG

The Rt. Hon. Hilary Benn MP, Secretary of State for Environment, Food and Rural Affairs

The Rt. Hon. Ruth Kelly MP, Secretary of State for Transport

David Cameron MP, Leader of the Conservative Party

John Bowis MEP, Conservative

Jean Lambert MEP, Green

Baroness Ludford MEP, Liberal Democrat

Claude Moraes MEP, Labour

Richard Barnes AM, Statutory Deputy Mayor and Leader of the Conservative Group

Len Duvall AM, Leader of the Labour Group, London Assembly

Darren Johnson AM, Green, Chair of the Transport and Environment Committee

Mike Tuffrey AM, Leader of the Liberal Democrat Group, London Assembly

Valerie Shawcross AM, Chair of the Transport Committee, London Assembly

Tim Hockney, Executive Director, Transport, London First

Councillor Colin Barrow, Leader of the Council, City of Westminster

Councillor Merrick Cockell, Leader of Kensington and Chelsea Council