

Mayor of London's response to Government's consultation on draft Air Quality Plan

June 2017

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Appendix A contains responses to the official consultation questions.
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Section 1: Summary

The draft Plan is a deeply disappointing document, demonstrating a lack of leadership and is a missed opportunity. It is a plan for local authorities to have plans without giving them the effective support they need and lacks specifics on vital national action and funding. It provides no information on how implementation of the most effective measures will be mandated and secured, does not effectively tackle all emission sources (e.g. non-transport) and does not utilise the full arsenal of the Government's resources and powers. Crucially, it does not demonstrate how the Government will achieve compliance as quickly and as effectively as possible, with the greatest likelihood of success.

Londoners cannot wait for action. We currently estimate over 9,000 Londoners are dying prematurely every year from long-term exposure to air pollution. The estimated annual economic cost of the health impacts associated with long term exposure to poor air quality is estimated to be up to £3.7billion in London alone.

The current timetable with compliance in London by 2025 is not ambitious enough and appears arbitrary. Compliance must be achieved as soon as possible. Beyond formal

compliance, the plan should be delivering further improvements in other pollutants which impact health, such as PM_{2.5}.

The Government has adopted the wrong approach and appears to have been motivated by political considerations rather than tackling air quality as effectively and quickly as possible. This is demonstrated most clearly in the plan identifying charging Clean Air Zones as a 'last resort' when the Government's own Technical Evidence and London's experience suggests that they are the most effective large-scale intervention. Compared to the previous Plan (adopted in December 2015) this is a backwards step.

The Government's emphasis on local road layout changes and smoothing traffic flow, such as removing speed humps, could compromise other priorities such as road safety and is unlikely to be effective at delivering the scale of pollution reductions we desperately need. It should not be at the heart of the draft Plan, and again appears to reflect political considerations rather than making the difficult decisions needed to solve the issue. As an alternative, we recommend that the Government adopts the Healthy Streets Approach advocated by Transport for London which considers our streets more holistically, with a more sensible focus on reducing traffic and promoting walking, cycling and public transport.

Instead, there needs to be much more of an emphasis on Government action and funding. The Mayor and other local authorities do not control all the necessary (and some of the most effective) policy levers and compliance can only be achieved as quickly as possible if Government uses its own powers, takes action, empowers others and provides funding. In particular, the Government should set out clear proposals for a national vehicle scrappage fund, which would help accelerate compliance, improve the effectiveness of Clean Air Zones and ensure that legal compliance is achieved in as fair a way as possible.

Further to this, current national policy contradicts and works in opposition to proposed local action (e.g. tax incentives promoting diesel vehicles, which are likely to dilute the effectiveness of charging Clean Air Zones) and this urgently needs to be corrected.

The failure to include the impact of a third runway at Heathrow Airport, which is now adopted Government policy, is a significant oversight that strikes at the credibility of the draft Plan and suggests that the Government is simply trying to ignore difficult issues. As the Mayor's response to the recent consultation on the National Policy Statement (NPS) made clear, there appears to be buck-passing between the NPS and the Air Quality Plan leaving an accountability vacuum rather than a coherent policy. This increases the concern about the severe environmental and surface access impacts of Heathrow expansion. As a result, the Mayor remains deeply sceptical as to whether Heathrow expansion can ever be the right answer for London and the UK.

The Mayor has always committed to doing all he can where he has appropriate powers, such as in relation to transport sources. This includes introducing the T-charge in October this year, bringing forward and expanding the Ultra Low Emission Zone (ULEZ), and transforming London's bus and taxis fleets. He is also utilising his planning powers to tackle building and construction emissions, including through implementing 'Air Quality Neutral' planning requirements and a Non Road Mobile Machinery Low Emission Zone.

The Mayor will shortly be publishing his draft London Environment Strategy and draft Transport Strategy. Both documents will set out additional measures that will reduce emissions and exposure and improve air quality, both by promoting mode shift to walking, cycling and public transport and (for those vehicles that remain) by incentivising the use of zero emission technologies. While still being finalised, GLA officials will liaise with Defra officials to ensure that relevant additional measures can be reflected in the final Air Quality Plan.

However, non-transport sources contribute half of the NOx emissions in London. Clearly achieving compliance as quickly as possible requires us to tackle these as well as transport emissions. However, the draft Plan has far too little to say on these important sources and what is said appears to be an after-thought. The Government needs to provide additional powers to the Mayor and other local authorities so a comprehensive plan can be developed. These additional powers should be conferred through a new Clean Air Act which would also provide a legally enforceable right to clean air. The Mayor stands ready to take additional action on non-transport sources in London, such as construction, buildings and the river, should he be given such powers by Government.

Finally, the plan should promote opportunities to support the UK's industrial strategy and climate change targets. Air quality and climate change must be considered together with many of the solutions the Mayor has proposed to tackle air quality also helping to meet our climate commitments under the Paris Agreement. In particular, the government need to create the right conditions so that UK industry develops world class solutions that can be used to improve conditions at home and abroad. This includes support for innovative retrofit technology and the ever growing supply chain for electric and alternatively fuelled vehicles, which are both vital for people wanting to upgrade their fleets in preparation for Clean Air Zones.

Section 2: Respondent details

This response is on behalf of the Mayor of London. It should also be considered as the response of the Greater London Authority (GLA), Transport for London (TfL) and other Greater London Authority Group (GLA Group) functional bodies.

The GLA is the strategic authority for London. Under the GLA Act 1999 the Mayor of London has legal responsibility for preparing an Air Quality Strategy for London and leads on the implementation of measures in the capital to tackle pollution emissions, reduce exposure, raise awareness and integrate air quality and public health. The 32 boroughs and the City of London must have regard to the Mayor's Strategy when exercising their local air quality management functions. The Act also delegates certain supervisory powers over those functions under the Environment Act 1995 from the Secretary of State for Environment, Food and Rural Affairs to the Mayor of London.

Section 3: London and wider context

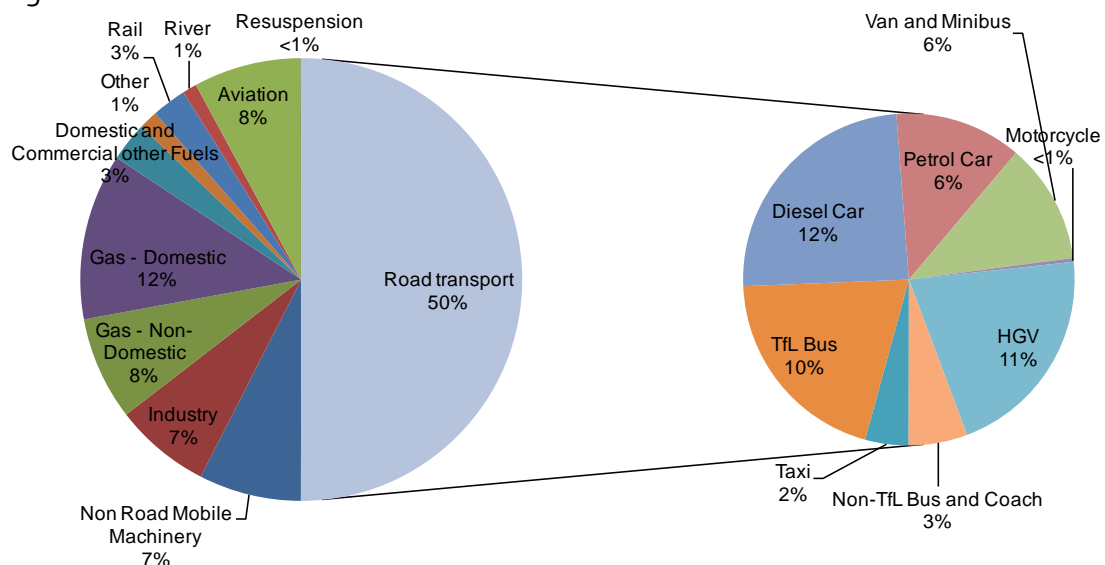
Poor air quality is not only a public health issue but a matter of social justice. We currently estimate over 9,000 Londoners are dying prematurely every year from long-term exposure to air pollution. Our latest research shows that over 20 per cent of schools in the capital are in areas exceeding safe legal pollution levels. The estimated annual economic cost of the health impacts associated with long term exposure to poor air quality is estimated to be up to £3.7billion in London alone.

Dieselisation of the UK fleet has been a public policy failure, with sales of diesel cars increasing from around 10 per cent of the market to around 50 per cent in a decade. This has been coupled with the failure of European vehicle emission standards, which have not been effective at reducing NO_x emissions from diesel light vehicles in urban environments and real-world driving conditions. London, like many other cities, could have achieved NO₂ compliance much sooner if it was not for these failures. The Government has a legal duty to lobby for stricter vehicle testing regimes, reassess fiscal incentives, promote public awareness and scrap the most polluting diesel vehicles.

As exhaust emissions reduce, the proportion of emissions from tyre and brake wear is expected to increase. Indeed, the latest London Atmospheric Emissions Inventory based on research by King’s College London indicates that up to 75 per cent of road transport emissions of PM come from tyre and brake wear. To date limited action has been taken to address these sources. Government has a critical role to play in undertaking additional research to further understand this issue, and then putting in place appropriate steps to reduce this emissions source. This might include incentives for consumers and manufacturers and wider measures to promote active travel and clean public transport.

There is a strong focus on transport measures in Defra’s action plan. This is important as road transport is often the greatest contributor to NO₂ exceedence in locations where the majority of people are active (e.g. the roadside). However, road transport only accounts for roughly half of NO_x emissions in London and the government must implement policies to reduce emissions from non-transport sources, as well as grant additional powers to the Mayor so he can take further action himself.

Figure 1: NO_x emissions in London in 2013



Crucially, the development of the national Air Quality Plan takes place as the UK develops its approach to exiting the European Union ('Brexit'). With so much of the existing regulatory and enforcement architecture in relation to air quality established at the EU level it is vital that this is fully adopted in UK law, that no attempts are made to weaken existing standards, and that there is a legally enforceable right to clean air with appropriate penalties.

In addition, the plan notes the importance of the National Emissions Ceiling Directive for addressing transboundary pollution. It is important that collaboration between the UK and EU continues after Brexit to ensure that these commitments, and any future reductions agreed, are achieved. This is particularly important to continue driving down concentrations of PM_{2.5}, which remain well above World Health Organisation recommended limits.

Section 4: The Mayor's existing air quality programme

The amount of money committed to tackling the capital's air quality crisis by the Mayor has more than doubled over the next five years. TfL's Business Plan includes £875 million to deliver far-reaching programmes to tackle the threat to health from poor air. These include:

- Introducing an Emissions Surcharge (dubbed the 'T-Charge) on top of the Congestion Charge, which will remove older polluting vehicles from central London this year (starting 23 October 2017).
- Launching the world's first Ultra Low Emission Zone (ULEZ), which puts in place minimum emission standards for all vehicles (excluding taxis, whose emissions are addressed through separate licensing requirements). The Mayor proposes (subject to consultation) to apply these standards in central London from 8 April 2019, which has been brought forward from September 2020. They will then apply, in outer London for buses, coaches and lorries by 2020 and in inner London for all vehicles except taxis by 2021.
- Spending more than £300 million transforming London's bus fleet by retrofitting thousands of vehicles and a commitment to purchase only hybrid or zero-emission double decker buses from 2018 and with all buses meeting the Euro VI standard by 2020.
- Making sure TfL no longer licence new diesel taxis from 2018, maintaining the 15 year age limit and £65 million in support to the trade to help upgrade taxis to much cleaner, 'zero emission capable' vehicles.
- Introducing Five Low Emission Neighbourhoods (LENs) spanning eight boroughs and involving a range of local businesses, with funding for a further five business-led LENs. This is in addition to continuing the Mayor's Air Quality Fund and together these targeted actions will tackle some of the worst pollution hotspots across London, with TfL contributing £14m.
- Providing alerts to Londoners during high and very high pollution episodes by issuing information on 2,500 bus countdown signs, at 140 roadside variable message signs and at 170 tube stations.
- Establishing a Cleaner Vehicle Checker, enabling Londoners to check the real world emissions from a vehicle they may be considering buying.

The GLA is also taking forward a number of initiatives to reduce pollutants from other sources, such as construction machinery and gas boilers. To support this work it has secured £10 million from the Government's Growth Deal 3 to replace boilers used by small and medium sized enterprises. It is also undertaking air quality audits at 50 of the primary schools located in the most polluted parts of London. London boroughs will then be able to access £1 billion in Local Implementation Fund (LIP) funding to deliver improvements.

Section 5: Comments on the draft plan

The draft Plan is a deeply disappointing document, demonstrating a lack of leadership and is a missed opportunity. It is a plan for local authorities to have plans without giving them the effective support they need and lacks specifics on vital national action and funding. It provides no information on how implementation of the most effective measures will be mandated and secured, does not effectively tackle all emission sources (e.g. non-transport) and does not utilise the full arsenal of the Government's resources and powers. It does not demonstrate how the Government will achieve compliance as quickly and as effectively as possible, with the greatest likelihood of success.

a) The Government's approach

The Government's approach is mistaken and appears to have been motivated by political considerations rather than tackling air quality as effectively and quickly as possible. This is demonstrated most clearly in the plan identifying charging Clean Air Zones (CAZ) as a 'last resort' when the Government's own evidence and London's experience suggests that they are the most effective large-scale intervention. This is addressed in more detail below.

The Government's emphasis on local road layout changes and smoothing traffic flow, such as removing speed humps, could compromise other priorities such as road safety and is unlikely to be effective. This ineffectual tinkering should not be at the heart of the draft plan, and again appears to reflect political considerations rather than making the difficult decisions needed to solve the issue. If the Government does continue down this path it should adopt the Healthy Streets Approach advocated by TfL which considers these issues more holistically and with a focus on reducing traffic and promoting walking and cycling.

Further information on the Healthy Streets Approach can be found here:
<http://content.tfl.gov.uk/healthy-streets-for-london.pdf>

b) The role of charging Clean Air Zones

The Government's new approach is that "*charging CAZs should only be used where local authorities fail to identify equally effective alternatives*"- in effect that they should be used as a last resort. This is inconsistent with its own Technical Report (page 191) and the evidence available about the superior effectiveness of charging CAZs to most other measures, especially in urban areas where both private cars and commercial vehicles are the dominant road transport emission source.

The motivation for this appears to be political; the Government does not want to be perceived to be penalising diesel car owners. This is ducking an option that is likely to be the most effective route to compliance. Instead the Government is setting up local authorities to fail, asking them to identify alternatives which either are unlikely to be effective or do not exist, thus ensuring the political 'blame' for the near inevitable introduction of charging CAZs rests with local authorities.

Consequently asking local authorities to find more effective alternatives is an unnecessary and time-wasting distraction. London is in a unique position because it has experience in running the Congestion Charging Zone and Low Emission Zone, and through TfL has the expertise to model the efficacy of such measures. Local authorities

outside London will not necessarily have access to that experience, leading to further delay in implementing charging CAZs. The Government's approach is likely to slow the implementation of these proven and effective measures, which will not achieve compliance as soon as possible. Vital improvements to public health will be delayed.

Furthermore, the Government's approach misunderstands the requirements of the Directive. Achieving legal compliance (and reducing exposure) by "the soonest date possible" is not a binary ("either/or") proposition. For example, if there is action that could be taken to reduce emissions by retrofitting some buses, and additional action which could be taken to reduce car emissions (e.g. through a charging CAZ), both actions must be taken should they both bring forward compliance.¹ It is not credible or acceptable to cherry pick the least unpopular interventions, and to say that is a comprehensive and sufficient plan. However, this would be a likely outcome of the Government's proposed approach.

In London, as part of the development of the Mayor's air quality proposals (to be contained within the forthcoming draft London Environment Strategy) charging CAZs have been identified as a vital and effective tool to bring compliance forward. The Mayor's Ultra Low Emission Zone (ULEZ) proposals put in place minimum emission standards for all vehicles (excluding taxis, whose emissions are addressed through separate licensing requirements). The Mayor proposes (subject to consultation) to apply these standards in central London from 8 April 2019 which has been brought forward from September 2020. They will then apply in outer London for buses, coaches and lorries by 2020 and in inner London (for all vehicles except taxis) by 2021.

c) Achieving compliance as quickly and effectively as possible

While charging CAZs are essential to bringing compliance forward, they do not by themselves achieve compliance *as quickly as possible*. This is why the Mayor continues to emphasise the urgent need for additional and complementary national action, using the unique powers available only to the Government – the ability to promote legislation, change fiscal incentives, raise revenue, locate national infrastructure and take national action.

There needs to be much more emphasis on Government action and funding, given local authorities do not control all the necessary (and some of the most effective) policy levers. Achieving compliance as quickly as possible is only achievable if Government uses its own powers, takes action, empowers others and provides funding. This is set out in more detail below.

Further to this, current national policy contradicts and works in opposition to proposed local action (e.g. tax incentives promoting diesel vehicles, which are likely to dilute the effectiveness of charging Clean Air Zones) and this urgently needs to be corrected.

The current timetable with compliance in London by 2025 is not ambitious enough and appears arbitrary. Compliance must be achieved as soon as possible. Beyond formal

¹ A further consideration is that, in this scenario, including buses in a CAZ – even where a local authority is already working with bus operators to retrofit some buses – would increase the likelihood of bus emissions being reduced. This is because a financial risk to a bus operator will be more effective at ensuring an otherwise voluntary retrofit programme is fully implemented. Maximising likelihood is another key element of the High Court's previous ruling.

compliance, the plan should be delivering further improvements in other pollutants which impact health, such as PM_{2.5}.

d) Heathrow

The failure to include the impact of a third runway at Heathrow Airport, which is now adopted Government policy, is a significant oversight that strikes at the credibility of the plan and suggests that the Government is simply trying to ignore difficult issues.

Heathrow expansion is taking us in the wrong direction exactly when we should be making every effort to improve public health and ensure UK compliance with legal limits as soon as possible.

The Heathrow area is already a major air pollution hotspot, with legal limits being breached for NO₂ on a regular basis. The National Policy Statement (NPS) is taking forward a third runway at Heathrow, with substantial increases in aircraft movements and road traffic. However, it fails to demonstrate that expansion can be delivered without worsening air quality and delaying compliance with legal limits. Indeed, the NPS acknowledges that if the airport opens in 2025 – as is currently envisaged – there is a high risk that several roads will be in breach of NO₂ limit values.

Analysis by TfL to date indicates that Heathrow expansion will result in increased traffic on several key links around the airport and towards central London, leaving many at risk of exceedence. Moreover, a third runway will increase traffic flows in 31 Air Quality Focus Areas, identified by TfL due to their high population and risk of exceeding the limit values.

The NPS relies on the Government's Air Quality Plan to sufficiently improve air quality, yet the draft Plan undermines the NPS with no specific reference to Heathrow. There is little commitment to new initiatives and a lack of clarity in how compliance will be achieved and in what timeframe. There appears to be buck-passing between the two policy areas leaving an accountability vacuum rather than a coherent policy.

It would be unacceptable for the NPS to seek to take advantage of improvements delivered by the Air Quality Plan, or the Mayor's own measures whose overriding objective is to improve the health of Londoners as quickly as possible, to allow an expanded Heathrow only to worsen air quality again.

The NPS begs more questions than it answers and the complete absence of Heathrow in the AQP gives the Mayor cause for concern about the severe environmental and surface access impacts of Heathrow expansion. He remains deeply sceptical as to whether Heathrow expansion can ever be the right answer for London and the UK.

e) Maximising opportunities for UK industrial strategy and tackling climate change

The plan should promote opportunities to support the UK's industrial strategy and climate change targets. Many of the solutions the Mayor has proposed to tackle air quality will also help meet our climate commitments under the Paris Agreement. In particular, the government need to create the right conditions so that UK industry develops world class solutions that can be used to improve conditions at home and abroad. This includes support for innovative retrofit technology and the ever growing supply chain for electric and alternatively fuelled vehicles, which are both vital for people wanting to upgrade their fleets in preparation for Clean Air Zones.

f) Legal points

The Mayor will use his powers (where he has them) to bring about limit value compliance as soon as possible in the most effective and practical manner. However, the underpinning legislation does not properly reflect this position, and could be strengthened and made less bureaucratic. It should also be noted that the Secretary of State has the power of direction over the Mayor and so retains ultimate legal responsibility for London's air quality².

The Mayor's role in terms of London's local air quality management (LAQM) under Part IV of the Environment Act 1995 ("1995 Act") is supervisory in nature, as recognised by Defra's LAQM Guidance 2016³. The Mayor relies on the Secretary of State's statutory guidance, rather than his own, to direct boroughs to participate in the London LAQM System and for them to have regard to any mayoral guidance on the performance of their LAQM functions⁴.

Boroughs are required⁵ to have regard to the air quality provisions of the London Environment Strategy ("LES"). The air quality provisions were previously contained in a stand-alone air quality strategy, but that Strategy now combines six environmental subject-areas, and so its air quality provisions are, of necessity, much less detailed as regards LAQM. Therefore section 88 of the 1995 Act should be amended to allow the Mayor to issue statutory guidance to London councils, in place of the Secretary of State, to reflect the current policy position. The procedure for giving directions under section 85(6) of the 1995 Act should be amended to make it less bureaucratic by dispensing with the requirement for publication in the London Gazette. If the Mayor is truly to have devolved responsibility for London's air quality then he should also be able to make regulations for London under section 87(1) of the 1995 Act to the same extent as the Secretary of State.

It is doubtful that the Government's new policy test for the use of charging CAZs is compatible with its legal duty to include measures that will bring about compliance in the quickest and most effective way possible, and with the greatest likelihood of success. The draft Plan provides no information about how any of its suggested measures – including charging and non-charging CAZs – will be mandated and their implementation secured, particularly if there is public resistance. When the draft CAZ Framework was consulted on earlier this year the Government proposed making regulations (and provided draft regulations) to require local authorities to consult on and implement charging CAZs. Without the assurance of action by Government to mandate their implementation there is no certainty or likelihood that its most effective measures will be implemented.

Section 6: Further action to be taken by the Mayor of London

The Mayor will use his powers (where he has them) to bring about limit value compliance as soon as possible in the most effective and practical manner. The Mayor will shortly be publishing his draft London Environment Strategy and his draft Transport

² Regulation 31(1) Air Quality Standards Regulations 2010 (SI 2010/ 1001).

³ See paragraph 1.5, Defra Local Air Quality Policy Guidance 2016 (PG16) at https://consult.defra.gov.uk/communications/laqm_changes/supporting_documents/LAQM%20Policy%20Guidance%202016.pdf.

⁴ Paragraph 1.5, PG16 (above).

⁵ Section 364 of the Greater London Authority Act 1999 (as amended)

Strategy. Both documents will set out additional measures that will reduce emissions and exposure and improve air quality. While still being finalised, GLA officials will liaise with Defra officials to ensure that relevant additional measures can be reflected in the final Air Quality Plan.

In particular, in his draft Transport Strategy the Mayor will be setting out his vision for a London where public transport and walking and cycling are the dominant modes of travel in London, reducing private vehicle kilometres across London, especially in central and inner London.

In addition to bringing forward the central London ULEZ, the Mayor proposes (subject to the development of detailed proposals and consultation) that the ULEZ is expanded to Inner London by 2021 for light vehicle (cars, vans, minibuses and motorbikes), covering an area up to the North/ South Circular. It is also proposed that by 2020 the ULEZ is expanded Londonwide for heavy vehicles, which will result in only an estimated 1 per cent of road length in Outer London remaining in exceedance of the NO₂ limit values after 2020: primarily on the North Circular and around Heathrow (which is a matter for national policy). The expansion of the ULEZ for light vehicles to Outer London would affect an additional circa 1.7 million households. It is likely that targeted local measures such as local road closures, vehicle restrictions or other interventions could be equally effective and as likely to bring this remaining 1 per cent of road length into compliance, and in a quicker timeframe. The Mayor will keep the situation under review and consider what measures will be most effective and likely to secure equivalent compliance on those Outer London roads in the shortest time possible. Furthermore, there is no appropriate boundary road for a wider zone that incorporates the north circular other than the greater London boundary.

It is important to remember that non-transport sources contribute half of the NO_x emissions in London. Clearly achieving compliance as quickly as possible requires us to tackle these as well as transport emissions. The Government needs to provide additional powers to the Mayor and other local authorities so a comprehensive plan can be developed. The Mayor stands ready to take further action on non-transport sources in London should he be given such powers and notes that he has now requested these on several occasions.

For construction sites, the current Non-Road Mobile Machinery (NRMM) Low Emission Zone (LEZ) is limited in scope because we are relying on planning powers to create and enforce the zone. This excludes a large proportion of the fleet. If the GLA and boroughs were given powers to enforce emission standards similar to those they have for on-road vehicles this could increase the impact of the current policy by 70 per cent as well as providing a clear framework for effective, consistent enforcement.

For the river, the Mayor is seeking simplification of the existing regulatory structure where five separate agencies are involved. Instead the Mayor proposes he acts as a single regulator, putting in place a single emissions control framework with the ability to charge and/or enforce in a way similar to the LEZ for vehicles. These new powers would need to incorporate existing environmental protections, such as preventing foul discharges to water.

<p>Section 7: Further action by Government that should be included in the final plan</p>

The emissions reductions in NO_x delivered by the measures set out in Sections 4 and 6 are important and capable of achieving NO₂ limit value compliance in London – but will not by themselves be sufficient to achieve compliance *as quickly as possible*. This can only be done if all levels of government take full and effective action using the complete range of the powers and resources available to them in a way that has the greatest likelihood of success. Central Government, in particular, has a crucial role to play as it has unique powers – the ability to promote legislation, change fiscal incentives, raise revenue, locate national infrastructure and take national action.

Over the past few months conversations have been held with a number of different Government departments in relation to their respective responsibilities. A summary of these ‘asks’ is provided below and, where relevant, further information is provided in the appendices.

In addition, TfL has prepared a comprehensive proposal for a national vehicle scrappage fund and the Mayor will shortly be writing to the Chancellor with his proposals on reforming pro-diesel fiscal incentives.

The Government should incorporate the following points into the final Plan:

a) Overarching

1. **A commitment to introducing a new Clean Air Act** to enshrine the limit values and supporting EU legislation within UK law and provide a legally enforceable right to clean air. This could also be a mechanism for granting the additional powers/action set out below.
2. **A quantified commitment to national funding** for major cities and other local authorities, recognising that current resources are insufficient and need to be increased.
3. **A commitment to providing enhanced public information** especially during air pollution episodes by utilising national communication infrastructure and working closely with the media, e.g. pollution updates on weather bulletins.

b) Transport

4. **A targeted scrappage fund** for vans, minibuses, taxis and cars. The Mayor has proposed a targeted, fully-costed, city-led, time-limited approach which simplifies administration for Government. The total cost of this in London over a two-year period would be £515 million. As the economic cost of the health impacts associated with air pollution in London is estimated to be up to £3.7 billion a year, this is clearly good value for money. Full details of this proposal are available to download via the TfL website:
<https://tfl.gov.uk/cdn/static/cms/documents/proposal-national-vehicle-scrappage-fund.pdf>
5. **A national retrofit certification scheme** to further reduce compliance costs to businesses and build on the work we’ve done with London’s bus fleet. This has been promised, but detail is yet to be announced and this needs expediting as a matter of urgency. Support to build UK industrial capacity and skills in this area is also required. More detail is set out in Appendix A.

6. **A targeted retrofit fund** for HGVs, buses, coaches and other specialist vehicles (such as ambulances and refuse vehicles). More detail is set out in Appendix A.
7. **Amending pro-diesel taxes** like Vehicle Excise Duty (VED), Company Car Tax and other tax incentives should be amended to remove the financial incentive to purchase diesel and only encourage ultra low emission vehicles. In their publication “Lethal and illegal: solving London’s air pollution crisis” IPPR showed that a strong package of national fiscal incentives to encourage a mainstream switch away from diesel, combined with local action such as those discussed above, could bring 99.96% of London below the limit value.⁶ The Mayor will shortly be writing to the Chancellor setting out his fiscal proposals relating to air quality in more detail.
8. Fiscal reform should be complemented by a **national ‘Cleaner Vehicle Checker’ or car labelling scheme**, similar to that being implemented by the Mayor.
9. **Accelerating the uptake of electric vehicles and charging infrastructure** by addressing structural power grid barriers and providing additional funding through OLEV. More detail is set out in Appendix A.
10. **A commitment to providing the necessary funding to convert all UK black taxis to zero emission capable models** by 2025 at the latest and scrapping older diesel taxis. Higher rate VED on taxis must also be removed so as not to make it harder for taxi drivers to purchase zero emission capable models.
11. **A commitment to updating the DVLA database** to include Euro standards for all registered vehicles to help enforce charging schemes as cheaply and efficiently as possible. More detail is set out in Appendix B.
12. **Preventing the illegal removal of Diesel Particulate Filters (DPF)** through enhanced MOT testing and spot checks.

c) *Non-transport*

13. **Allowing London planning policy to take precedence.** Changes that result from the Housing Standards Review could potentially complicate London’s ability to enforce existing emission standards on residential developments. Taking into account London’s growth, this would lead to a reversal of the emissions reduction delivered by the ULEZ. It is essential the Department for Communities and Local Government (DCLG) protect regional and local authorities’ ability to set appropriate air pollutant emission standards for new developments, such as the ‘Air Quality Neutral’ requirements included in the

⁶ IPPR’s modelling was done on the old emissions functions but it does illustrate the additional benefit that incentivising the uptake of petrol-hybrid vehicles over diesels can bring on-top of locally driven action. This argument is strengthened when looking at the emissions factors a switch from a Euro 5 diesel car to a Euro 6 petrol hybrid reduces NOx by around 40% more than if the vehicle switches to a Euro 6 diesel.

London Plan or new approaches like ‘Air Quality Positive’ which are currently being developed.

14. **Providing new powers for construction**, including stronger enforcement powers against Non Road Mobile Machinery (NRMM) both on and off construction sites. More detail is set out in Appendix A.
15. **Providing new powers and improved coordination for river and maritime vessels**, including having a single regulatory authority for the Thames and London tributaries and introduce minimum emissions standards. More detail is set out in Appendix A.
16. **Delivering a national boiler scrappage scheme** to tackle emissions from domestic and commercial properties particularly targeted at those on low incomes (to tackle fuel poverty) and for the premises of SMEs. More detail is set out in Appendix A.
17. **Revitalising smoke control zones and address wood burners** through a new fit-for-purpose testing regime and information on appropriate technology/fuels for smoke control zones at point of sale. More detail is set out in Appendix A.
18. **Discouraging the use of emergency diesel generators in the Short Term Operating Reserve and capacity markets** by implementing reforms as quickly as possible. Government should also apply more robust standards, and give the Mayor the powers to regulate this sector in London. More detail is set out in Appendix A.

Section 8: Conclusion

While the draft Plan was a missed opportunity there is still time for the Government to correct its deficiencies and develop a fit for purpose final Plan. If the Government were to take the steps set out above, when combined with the bold measures the Mayor already has already planned, legal compliance – and the important health improvements this represents – could be delivered in London well before the arbitrary 2025 date currently proposed for the Plan.

APPENDIX A: Responses to consultation questions

a. How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

For the reasons stated within the Mayor's covering letter and detailed consultation response we are not satisfied that the proposed measures will address the problem of Nitrogen Dioxide as quickly and effectively as possible, with the greatest likelihood of success. Compliance can only be achieved as quickly as possible if Government uses its own powers, takes action, empowers others and provides funding. The draft Plan does not provide reassurance that this will be the case. This should be corrected by including the further action by Government set out in section 7 of this consultation response in the final Plan.

b. What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it? What factors should local authorities consider when assessing impacts on businesses?

The use of emissions inventories to establish the source of the air pollution problems within cities is important to enable targeted interventions. The London Atmospheric Emissions Inventory (LAEI) is extremely important to London in establishing the baseline air quality and modelling the impact of proposed interventions. For road transport sources, arrangements should ideally look at means of reducing the overall levels of motorised vehicle travel as this is more effective at reducing pollution than technological solutions to reduce exhaust emissions (although these are clearly an important aspect).

The Government's new approach is that "*charging CAZs should only be used where local authorities fail to identify equally effective alternatives*"- in effect that they should be used as a last resort. This is inconsistent with its own Technical Report (page 191) and the evidence available about the superior effectiveness of charging CAZs to most other measures, especially in urban areas where both private cars and commercial vehicles are the dominant road transport emission source.

In developing the Ultra Low Emission Zone an Economic and Business Assessment was undertaken as part of a full integrated impact assessment. We would recommend that this is an appropriate means of assessing the impact on businesses. One important consideration is that the total impact of charging CAZs to businesses is considered. For instances, some businesses will operate in multiple Clean Air Zones and so it would not be appropriate for every individual CAZ to ascribe an economic cost to businesses.

In assessing the impacts on business, it is important that local authorities consider the benefits of CAZs to businesses as well as the compliance costs. Improving air quality may make an area more attractive for businesses and tourists, bringing associated economic benefits, as well as improving the health of staff.

c. How can Government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to

assess them? Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects. How can Government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives. How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?

The Mayor has developed proposals for a national vehicle scrappage fund for cars, vans, taxis and minibuses. This proposal is a targeted, fully-costed, city-led, time-limited approach which simplifies administration for Government. The total cost of this in London over a two-year period would be £515 million. As the economic cost of the health impacts associated with air pollution in London is estimated to be up to £3.7 billion a year, this is clearly good value for money.

Any scrappage funding should be targeted for cities required to introduce a Clean Air Zone. To limit the overall cost of the scheme, funding should be restricted to low income households for cars and charities and small businesses for vans. The Mayor proposes that the scrappage should not be dependent on the purchase of a new vehicle and that alternatives to car ownership such as car club membership or season ticket loans could be offered. Full details of this proposal are available to download via the TfL website:

<https://tfl.gov.uk/cdn/static/cms/documents/proposal-national-vehicle-scrappage-fund.pdf>

This is a scheme that should operate in tandem with a charging Clean Air Zone as a means of reducing the impact on individuals and business. It should be considered as an enabler to taking stronger action. There is also evidence that providing incentive funding to scrap a vehicle increases the effectiveness of CAZs as it reduces the likelihood of someone 'staying and paying'.

A competitive funding process amongst authorities operating a CAZ, akin to the process used by GLA and TfL to assess Mayor's Air Quality Fund and Low Emission Neighbourhood bids, would be beneficial. In addition to assessing proposals on their likely impacts, this assesses evidence that boroughs have been working with local communities and businesses to gain support and buy in for the proposals and whether match funding from the private sector is available. We are happy to discuss this process in more detail with Defra and the Joint Air Quality Unit.

Funding should not be utilised for business as usual scheduled infrastructure projects without clear evidence that there will be an air quality benefit. It is disappointing that the government has seemingly proposed that there will be a road hump removal fund without presenting any evidence that this will benefit air quality. We do not believe it will have any significant benefits for air quality and would in fact be very detrimental to road safety and making London's streets attractive for active travel - and zero emission - modes such as walk and cycling.

- d. How best can governments work with local communities to monitor local interventions and evaluate their impact? The Government and the devolved administrations are committed to an evidence-based approach to policy delivery and will closely monitor the implementation of the plan and evaluate the progress on delivering its objective.**

The Government should ensure that there is sufficient funding set aside to evaluate and monitor the impact of any proposals.

- e. Which vehicles should be prioritised for government-funded retrofit schemes? We welcome views from stakeholders as to how a future scheme could support new technologies and innovative solutions for other vehicle types, and would welcome evidence from stakeholders on emerging technologies. We currently anticipate that this funding could support modifications to buses, coaches, HGVs, vans and black cabs.**

Delivery of the framework for national retrofit certification is essential to provide certainty for businesses that compliance with Clean Air Zones is achievable. Targeted funding to help businesses comply with the CAZ standards will help achieve better compliance with standards and bring about further improvements in air quality and health. Support should also be provided by government to ensure that the UK has sufficient skills to undertake the vehicle retrofitting that will be required.

Buses are essential to providing sustainable public transport and helping to minimise private car travel in London and the regions. Ensuring there are sufficient solutions and support retrofitting them is vital to ensuring that bus services remain viable in CAZ cities.

Funding should also be prioritised for emergency service vehicles, such as ambulances and fire engines. This would enable their inclusion in CAZ at reduced cost to the emergency services.

Missing from the government's list of vehicles to retrofit is minibuses. These are often used by schools and charitable organisations to provide transport. A targeted fund for schools or charitable organisations would enable these organisations to comply with the CAZ standards at minimal cost.

Refuse collection vehicles should also be eligible for a retrofit or conversion fund. These are heavy diesel vehicles that operate on unique drive-cycles. Funding could be made available to local authorities to retrofit these vehicles or convert their operation to alternative fuels. This could be targeted at cities requiring the implementation of CAZs.

Retrofit is also vital to reduce emissions from the non-transport sector, such as NRMM and shipping, where long machine lifespans mean that improvements in base engine technology may not be felt for years or decades to come. The framework for national retrofit certification should therefore be extended to all sectors.

f. What type of environmental and other information should be made available to help consumers choose which cars to buy?

Providing clarity on the Euro standard of a vehicle and whether it is eligible to enter Clean Air Zones would be a good starting point for consumers. Evidence on the real-world CO₂ and air pollutant emissions from vehicles would also help inform consumer choice. The Mayor's proposed Clean Vehicle Checker, which will rate vehicles according to how closely their real world performance matches their certification, is a good example of this and provides a model for the Government to follow.

g. How could the Government further support innovative technological solutions and localised measures to improve air quality?

Innovative technological solutions

The Mayor committed in his manifesto to “deliver the electric charging infrastructure, in partnership with the private sector, necessary for a major expansion in the use of electric vehicles”.

TfL supports the switch from diesel and petrol vehicles to ultra low emission vehicles (ULEV) as they are critical to reducing emissions from London's vehicle fleet and improving air quality. They have a role in developing London into a zero carbon city by 2050. We actively encourage the switch to ULEVs in taxi and private hire vehicle fleets, commercial vehicle fleets and car sharing fleets.

TfL has conducted research on charging infrastructure provision in London, including its ULEV Delivery Plan, Charging Infrastructure Location Guidance, and the Plug-in Electric Vehicle Uptake and Infrastructure Impacts Study. This research has highlighted that a lack of adequate charging infrastructure provision is a key barrier to the uptake of electric vehicle (EV) use in London.

TfL is committed to deploying a rapid charging network across London which will support the introduction of zero emission capable (ZEC) taxis, private hire vehicles and other commercial vehicles. Informed by its research, it has a target to deliver 150 rapid charge points in London by the end of 2018, of which 90 will be dedicated for taxis. By the end of 2020, TfL will have delivered 300 rapid charge points in total. TfL is facilitating a market-led approach to the provision of rapid charging infrastructure in London. With help from the public and private sector, TfL is identifying suitable rapid charging sites in strategic locations. TfL will use funding from Government, including £10m committed in the National Infrastructure Plan, to enable sites for use by charge point operators by upgrading power capacity.

The draft Vehicle Technology Bill proposed by the previous government created a regulatory framework to allow us to overcome some of the challenges preventing progress with London's electric vehicle infrastructure. In particular, Government must invest to ensure the grid and energy network is capable of hosting large numbers electric vehicles. Robust planning regulations at a national level would also strengthen local requirements for infrastructure in new developments, making electric vehicles a convenient choice for residents and businesses.

In March 2016, TfL commenced procurement of a framework of rapid charge point operators for public sector sites in London. To win a place on the framework, operators

will be required to demonstrate their ability to finance, install, operate and maintain rapid charging infrastructure. The framework contracts were awarded in April 2017 with the first charge points installed in summer 2017.

London was awarded £13m funding from the Office for Low Emission Vehicles (OLEV) for supporting the uptake of ULEVs through the Go Ultra Low City scheme.

The Government funding secured for London will provide charging infrastructure to encourage and support ULEV uptake to 2020. There is a business case for private sector investment in charging infrastructure where usage will be high enough to generate a return on investment. However, further Government funding will be required beyond 2020 to support the private sector in expanding charging infrastructure to meet demand, and to enable uptake for less high usage applications, such as residential on-street charging.

TfL recognises that interoperability between charging networks is of key importance to ensuring ULEV users can have confidence in their ability to charge their vehicles when and where they need to. The Vehicle Technology and Aviation Bill proposed by the previous government included measures to address these concerns, and we would welcome the early reintroduction of legislation to overcome this barrier to ULEV uptake in the next government.

TfL is involved in a number of innovative charging projects, including induction charging and utilising existing power capacity to charge EVs, and these new technologies can further enhance the charging experience for EV consumers. TfL expects that grid balancing and energy storage schemes will develop significantly in future years. This will enable consumer, domestic, industrial and commercial energy storage systems to capture excess electrical energy generated by sustainable generation due to climatic conditions, or from conventional generation in off-peak periods, to reduce inefficient demands for generating capacity. In a Smart City environment, this storage capacity might take the form of batteries installed in buildings, or vehicles plugged into the grid. This is often referred to as vehicle-to-grid technology (V2G).

At times of peak demand, energy can be drawn from these storage sources, and a number of pilots are currently underway. Therefore, the Government should consider how the technical standards between vehicles and buildings through a Smart Grid are developed, and that these are based on international protocols.

Local measures

The Mayor is supporting five Low Emission Neighbourhoods (LENs) spanning eight boroughs and involving a range of local businesses, with funding for a further five business-led LENs. This is in addition to continuing the Mayor's Air Quality Fund, and together these targeted actions will tackle some of the worst pollution hotspots across London, with TfL contributing £14m.

Further information on local action in London taken through the Mayor's Air Quality Fund can be found here:

<https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/mayors-air-quality-fund-report-2016>

h. Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?

It is worth re-iterating our response to the draft Clean Air Zone Framework that using the terminology Clean Air Zone to refer to both charging and non-charging Clean Air Zones is problematic and may hamper local authorities in communicating the requirements of a Clean Air Zone.

There is a strong focus on transport measures in the action plan. This is important as road transport is often the greatest contributor to NO₂ exceedence in locations where the majority of people are active (eg the roadside). However, road transport only accounts for roughly half of NO_x emissions in London and the Government must remain supportive of other policies to reduce emissions from non-transport sources.

Domestic and commercial buildings:

According to LAEI figures Domestic and Commercial gas use makes up around 20% of NO_x emissions in London, with a further contribution of 3% from other fuels such as diesel in generators. This is the second largest sector of emissions after road transport and contributes very nearly as much NO_x as buses and HGVs combined.

The majority of emissions in this sector are associated with space and water heating, with a smaller amount coming from power generation and testing of emergency backup generators. The government's plan is limited to reducing the need for heating through energy efficiency programmes and restrictions on emissions from new larger generators from the end of 2018, with emissions limits for existing systems only coming in after 2025.

A number of simple measures could be introduced to rapidly and progressively reduce domestic and commercial building emissions. For instance a standard 'class 5' domestic boiler emits 70 mg/kWh of NO_x but "ultra-low NO_x" boilers emitting 40 mg/kWh are widely available at no extra cost: by mandating that all new and replacement boilers meet this lower standard, emissions could be cut rapidly. Green infrastructure could also potentially have a role to play in some developments and should be encouraged.

In the past the uptake of ultra-low NO_x boilers was encouraged by the Code for Sustainable Homes. Since this was removed in 2015 the only mechanism for introducing these limits is through planning conditions. While this is promoted by the Mayor through his planning guidance it can only affect first installations and not the replacement of boilers in existing homes.

Similarly the emissions from more complex heating plant, such as gas engine combined heat and power plants, is not controlled (except where the Mayor can influence through his planning powers). They easily could be by new legislation or changes to building regulations.

Emissions from existing buildings could be further, and rapidly, reduced by a national boiler scrappage scheme to replace older inefficient boilers with more efficient, ultra low NO_x models. Experience from the recent "better boilers" replacement scheme in London shows that replacing older boilers with newer ones can have positive effects on emissions as well as alleviating fuel poverty for some of the worst off in society. This could be complemented by a wider building retrofit programme.

Proposals to limit emissions from diesel generators are welcomed but inadequate; the majority of emergency generators in London will be excluded either by size (less than 1 MW) or by limited operational hours (less than 500 hours). A recent study undertaken in the City of London and Westminster showed that even smaller generators operating for limited hours can have significant impact on local air quality. This report was shared with Defra during the formulation of its Air Quality Plan.

Again significant reductions in emissions could be achieved simply by 1) removing the exemption for smaller or lower use engines and 2) bringing forward the implementation date. Amending the Capacity Market Mechanisms such as 'STOR' and 'TRIAD' could also have a positive effect by reducing incentives to use these engines.

Construction equipment and Non-Road Mobile Machinery:

Non-Road Mobile Machinery (NRMM), including the construction sector, is the third largest sector in terms of NO_x emissions in London after road transport and buildings. This sector is not only a significant contributor to overall background pollutant levels but can be a significant local issue, particularly around major construction sites than can take many years to complete.

The Government's Plan proposes no measures to control this sector beyond the adoption of EU stage V emission limits from 2019/2020, which they are anyway required to do.

As with road vehicles it is simply not sufficient to introduce new engine standards and then wait for the fleet to be replaced with new machines. This is even more the case with NRMM where fleet turnover is much slower than on the roads.

The Mayor has used his planning powers to create the world's first NRMM Low Emission Zone in London. While this is successful, with over 1,900 machines registered on more than 600 sites, experience of running the scheme since 2015 has shown that the use of planning powers alone is not enough to effectively and rapidly improve the fleet.

Introduction of a national register of machines, as is done with road vehicles, would allow for much simpler regulation and identification of machinery. Directed, appropriate powers to create and enforce NRMM low emission zones in a similar way to CAZs for vehicles would broaden the application of restrictions and give a clear signal to industry on the action that they need to take. Estimates are that emissions could be reduced by an additional 70per cent with effective powers to control this sector.

Creation of appropriate powers to control this sector would also allow for retrofit equipment for older machines to be included in the proposed Clean Vehicle Retrofit Accreditation Scheme (CVRAS). This would provide additional confidence to companies developing technologies in this sector.

Shipping and inland waterway vessels:

The only action proposed to tackle emissions from shipping and inland waterway vessels is the introduction of new emission standards for international shipping, which is being

introduced by the International Maritime Organisation independently of the UK government.

London is home to the river Thames which is Britain's busiest inland waterway, handling over five million tonnes of goods and materials a year. The Thames tributaries and canals are home to a growing population of residents. As with NRMM the turn-over of the river and canal fleet is slow as vessels have a long life span.

Control of this fleet and clear signalling of what is expected to reduce their emissions is further complicated by a surfeit of regulators: in London five different regulators control different sections of the waterways and the fleet.

Simplification of the regulatory structure would provide clarity and consistency for the operators and allow for the development of common solutions to the problems of retrofit and replacement in the confined environment of a vessel.

A simplified and effective single regulatory authority for the Thames and London tributaries could introduce minimum emissions standards that could rapidly reduce emissions from this sector.

Wood and solid fuel burning:

Existing control on the burning of wood and other solid fuels are inadequate to the needs of a modern city where cleaner alternatives are readily available.

Current controls, through the Clean Air Act, are very loose in respect of particulate matter and non-existent for NO_x. In order to control this source of emissions the Clean Air Act needs urgent updating.

Smoke control zones could be revitalised through a new fit-for-purpose testing regime for exempt appliances and information on appropriate technology/fuels for smoke control zones at point of sale.

Red diesel:

We welcome the call for evidence on red diesel. This should consider the use of diesel engines in refrigeration units as these are not subject to the same engine regulations as vehicles. Further work is required to understand the specific impact these have on air quality, and to put in place appropriate national measures to help address this.

Maximising co-benefits:

There is a missed opportunity to more fully consider the benefits of PM2.5 reduction within the draft Plan, and potential links to carbon reduction. The Department for Business, Energy and Industrial Strategy should prioritise measures that address CO2 emissions and air pollution in tandem, such as energy efficiency and boiler replacement, and formally include reducing air pollutant emissions as one of its objectives.

Housing and planning:

In addition to tackling emissions from existing buildings it is important to ensure that the planning system allows for a suitable level of control over new buildings if

compliance is to be maintained in the long term. The GLA has undertaken a number of initiatives, such as the introduction of Air Quality Neutral standards and emissions limits for combined heat and power systems, and is also developing new 'Air Quality Positive' requirements, but these could be strengthened with firmer support in the National Planning Policy Framework (NPPF) or elsewhere in planning policy. There is also a significant issue with permitted development rights, particularly in relation to offices being redeveloped as residential. As these developments are not subject to normal levels of scrutiny it is not possible to ensure that they do not have a detrimental impact on local air quality.

Changes that result from the Housing Standards Review could potentially complicate London's ability to enforce existing emission standards on residential developments. Taking into account London's growth, this would lead to a reversal of the emissions reduction delivered by the ULEZ. It is essential the Department for Communities and Local Government (DCLG) protect regional and local authorities' ability to set appropriate air pollutant emission standards for new developments. The Government must allow London planning policy to take precedence on these matters.

Appendix B: DVLA database

Access to the DVLA database is required to identify compliant vehicles and to provide the ability to contact owners of affected vehicles through the DVLA to inform them of new emissions requirements. This is critical to the successful implementation of Clean Air Zones.

DVLA should expand its database to include the following information as a matter of urgency:

- The Euro standard of all vehicles (this is especially important if the vehicle meets a higher Euro standard before the mandatory type approval date and in the case of vehicles, particularly coaches, with a derogation to meet the older Euro standard).
- Full details of the emissions of each regulated pollutant produced by the vehicle to ensure monitoring of scheme effectiveness is accurate.
- The Euro standard of a vehicle should be included on the vehicle license. This will help operators understand if their vehicle meets emission scheme standards both in the UK and EU and help operators avoid fines (e.g. currently all UK HGVs have to pay toll fees in Switzerland as they cannot prove Euro standards on their license documents).
- Full details of any accredited retrofit equipment that has been installed to achieve compliance with Clean Air Zone standards and the vehicle approved.

The additional information above is essential for local authorities to identify vehicles and provide information to affected vehicle owners as to whether or not they are compliant.

Stakeholders representing fleet operators have raised particular concerns to TfL around enforcement of the ULEZ and our ability to recognise Euro V and Euro VI vehicles manufactured within the same year.

For the Emissions Surcharge (T-charge) TfL has been able to produce a solution to cross check datasets it has from DVLA and other sources, rather than a single source of information, which has been at a cost. However, for the Clean Air Zones and the Ultra Low Emission Zone, the best solution would be for the DVLA to backfill the Euro standard classification data, allowing a single accurate source of information to become available for any authority wishing to tackle emissions.

This data should be made available freely and without charge to local authorities to minimise the cost of designing and operating CAZs. We are grateful that we were able to use DVLA data for our own vehicle eligibility checker.

Allowing local authorities to use DVLA data, through the DVLA to inform registered keepers of non-compliant vehicles of upcoming Clean Air Zones would also benefit in increasing awareness of and compliance with the zones.