

**Mr Edelsten**

Area 3C, Ergon House  
17 Smith Square  
London SW1P 3JR

Dear Mr Edelsten

**Response to Defra consultation on PM10 limit value extension**

Thank you for providing Transport for London (TfL) and the Greater London Authority (GLA) with an opportunity to respond to the consultation on the UK's draft time extension notification to the European Commission for the particulate matter (PM10 – dust particles) limit value as set out in the 2008 Directive.

As noted in the consultation document, the Mayor is committed to working with the Government to identify measures that will ensure that the UK will meet the limit value for PM10 in 2011. To this end, officials from TfL and GLA have been working closely with Defra officials over recent months in helping prepare the UK action plan for submission to the EU. We therefore broadly support the approach as set out in the consultation documents. The Mayor believes that it would be counterproductive to call upon the Commission to refuse the Government's request to extend the deadline for meeting PM10 limit values as this approach will not deliver actual improvements in air quality on the ground.

An initial task has been to agree a baseline, so that we can better understand the scale of the problem. In this context, the GLA has provided and will continue to provide information to the Government on the major air quality initiatives being implemented in London. GLA and TfL officials are committed to working together with colleagues at Defra over the coming months to look at potential measures that could be taken at the local, regional and national level to further reduce PM10 emissions in London. This is especially important, given that around 40 per cent of PM10 concentrations in London can be attributed to pollution from outside London. Since air pollution is a shared problem, it requires a joint approach to reduce it.

The Mayor is already committed to a number of initiatives that will improve air quality in London and has provided Defra with information about these measures to support the notification. Generally, these have been accurately presented in Form 7 (Regional) of Annex A – Draft Time Extensions notification forms. However, some minor clarifications are set out as an annex to this letter.

Work is underway to review the Mayor's Air Quality Strategy. A first draft of this Strategy will be prepared by summer 2009 for consultation with the London Assembly and the Functional Bodies of the GLA. This will be followed by consultation with the public and stakeholders later in the year, with publication of the final Strategy by summer 2010. The review of measures that will be included in the Air Quality Strategy will feed into the work being undertaken with Defra officials to support the notification.

We note that the Consultation Document states that "whilst sections of roads in Greater London have presented the greatest challenges, Defra are confident that existing measures and those in development will enable compliance by 2011." The Mayor is also committed to complying with the limit values. However, it is important to bear in mind the inherent uncertainty in modelling and the influence of pollution sources outside London and meteorology, which are difficult to predict. It is also worth noting that in recent years concentrations have not decreased in the way that models have predicted.

Since the consultation documents were drafted, the Mayor has stated his intention to postpone Phase 3 of the London Low Emission Zone (LEZ) as well as removing the Western Extension to the Congestion Charging Zone (WEZ), subject to further consultation. The modelling Defra has used to support the Time Extension Notification included both LEZ Phase 3 and WEZ. TfL officials are working with colleagues at Defra to determine the impact of these proposed changes on this modelling. There are also specific references to LEZ Phase 3 and WEZ in Annex B – Technical report to accompany UK Time Extensions Notification Forms.

I look forward to further cooperation between officials at Defra and those at TfL and the GLA on measures to reduce concentrations of PM10 in Greater London. If you have any queries regarding this response to the consultation, please contact me.

Yours sincerely

**Isabel Dedring**  
Director of Environment

## **Annex: Corrections to Form 7 (Regional) of Annex A – Draft Time Extensions notification forms**

- The section on the London Low Emission Zone (Regional\_UK001\_A1) refers to Phase 3 of the scheme. The Mayor has recently announced his intention to suspend introduction of Phase 3.
- Congestion Charging is administered by TfL, not the London boroughs. Therefore, it is not possible for boroughs to offer Congestion Charging incentives (as described in Regional\_UK001\_C2). For clarification, TfL already offers an exemption from the congestion charge for electric vehicles.
- The reference to encouraging electric vehicles (Regional\_UK001\_C2) does not accurately reflect the Mayors stated intentions. We suggest that it should read: “The Mayor has already committed to funding around 100 further electric vehicle charging points by 2012 through Local Implementation Plan settlements. TfL will be funding the installation of 75 additional charging points through the 2009/10 LIPs settlement.”
- The description of Congestion Charging in Regional\_UK001\_E5 is slightly misleading. Rather than define a specific scheme, it might be more accurate to state that: “Congestion Charging will be reviewed to offer discounts to the cleanest vehicles.”
- The references to ‘Land Use Planning’ and ‘Improve transport in a sustainable way’ (Regional\_UK001\_H3) are rather vague at present.
- The measures described at Regional\_UK001\_E2 and Regional\_UK001\_E3 (travel demand and car users) are Mayoral policies, and should not be labelled simply as part of the Local Implementation Plan process.