

# CAMPAIGN FOR CLEAN AIR IN LONDON

*“The cross-party campaign to achieve urgently and sustainably at least World Health Organisation recommended standards of air quality throughout London”*

Campaign website: [www.cleanairinlondon.org](http://www.cleanairinlondon.org)

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24 June 2010

Dear Mayor Johnson and Transport for London

**‘Clean Air in London’ rejects Mayor’s (sole) proposal i.e. delay Phase 3 of LEZ to January 2012**

**‘Bad Air Day (B.A.D.) 2010 for particles’ as PM<sub>10</sub> daily limit value for a whole year is breached in London in less than six months**

**Mayor says fines are ‘potentially £300m per year for each pollutant’ but still refuses to publish his health study explaining methodology and breaking down 4,300 premature deaths by borough/ward**

**Mayor must take more urgent, more radical action now to improve air quality throughout London**

**Mayor should subsidise ‘one-off’ retrofit and scrappage costs for LEZ3 operators from £55m net annual income from western extension of congestion charge (WEZ)**

I am writing on behalf of the cross-party Campaign for Clean Air in London (CCAL) to respond to the consultation on the Mayor and Transport for London’s (TfL’s) proposed deferral of Phase 3 of the London low emission zone (LEZ3) which closes on 28 June 2010 (the Consultation). Thank you for the opportunity to do so. The full consultation document can be seen at:

<http://www.tfl.gov.uk/corporate/media/newscentre/archive/15508.aspx>

Details of CCAL’s mission and a list of its supporters can be found at [www.cleanairinlondon.org](http://www.cleanairinlondon.org).

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CCAL supports strongly (except if in conflict with this letter in which case this letter prevails) all the comments made by the Campaign for Better Transport, ClientEarth, Environmental Protection UK and Friends of the Earth in their responses to this consultation.

The PM<sub>10</sub> daily limit value for a whole year has been breached in London in less than six months. See:

[http://www.londonair.org.uk/london/asp/publicstats.asp?statyear=2010&mapview=PM10b&region=0&site=CT8&postcode=&la\\_id=&objective=All](http://www.londonair.org.uk/london/asp/publicstats.asp?statyear=2010&mapview=PM10b&region=0&site=CT8&postcode=&la_id=&objective=All)

This breach is very significant, *inter alia*, since:

- it throws further doubt on the UK's reapplication for a time extension until 2011 to comply with the PM<sub>10</sub> daily limit value (i.e. to avoid the prospect of fines) not least because there is no 'sea breeze' causing these problems (as the Government may try to argue);
- with no more than 35 breaches allowed in the whole of 2011 (even if the UK obtains a time extension for PM<sub>10</sub>), it shows that the Government and Mayor need to do much more, much faster to improve air quality in London;
- will we see the Mayor's chaotic traffic measures to tackle (many) local 'hotspots' or will we see a 'well thought-through' 'Clean Air Zone' in inner London; and
- it reminds us how 'daft' Mayor Johnson was to postpone LEZ3 last year.

The air pollution problem in London is much worse than most of us have realised.

## Summary

The Mayor announced his decision to suspend Phase 3 of the London low emission zone (LEZ3) on 3 February 2009. As early as 18 March 2009, the London Assembly passed a motion calling on the Mayor to reverse his decision. Subsequently 'most stakeholders' supported the retention of LEZ3 in their responses to the consultation on the Mayor's draft Transport Strategy.

The current consultation on the postponement of LEZ3 is farcical. For a start, it suggests implementing LEZ3 in January 2012 is a great new idea from the Mayor when the reality is he seems to have suspended a long-planned and crucial public health measure on a 'whim'. Worse, the Consultation omits crucial information and lists three options, two of which the Mayor tells us are not real:

1. implement LEZ3 on 4 October 2010 as originally planned;
2. postpone LEZ3 to 3 January 2012; or
3. scrap LEZ3 altogether.

The Consultation then goes on to say: the first of those options is 'no longer feasible'; the second is being consulted upon; and the third is not being consulted upon i.e. the Mayor has only one proposal which is to delay LEZ3 until 3 January 2012. CCAL does not comment further in this letter on the so-called 'Proposals' 1 or 3 other than to say the information about them is as inadequate as it is about Proposal 2.

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The continuing failure to provide adequate information means that CCAL and other consultees are unable to give intelligent consideration or an informed response to the option(s) being consulted on. For example, it is difficult to think of information which could be more relevant to the public consultation than that which shows the health impact of poor air quality in each part of London, and the extent to which the postponement of LEZ3, the removal of the WEZ and the Mayor’s other air quality proposals will result in EU air quality laws continuing to be breached.

If this information is not provided in good time, and at least 21 days prior to a final closing date for this consultation, we reserve the right to challenge this and other related consultations, and any decision taken following those consultations, in particular on the basis that such consultation has been inadequate and has failed to meet accepted public law standards.

TfL therefore should extend the deadline for comments on the current LEZ3 consultation by three or more weeks.

CCAL rejects (yet again) the Mayor’s proposal to postpone LEZ3 until 3 January 2012. To mitigate the financial impact on operators, CCAL urges the Mayor most strongly to use part or all the £55m net annual income from the western extension of the congestion charging zone (WEZ) to subsidise retrofit and scrappage costs for the most vulnerable operators. Amongst other things this would create a valuable precedent for linking directly road user charging with public health benefits and ‘green’ jobs.

## **Background**

As you know, details of Phase 3 of the proposal for a London low emission zone (LEZ3) were originally set out by Mayor Livingstone on 4 June 2007. See:

<http://www.tfl.gov.uk/corporate/media/newscentre/archive/5229.aspx>

That announcement followed a consultation which included details of the area, tonnes and the number of people expected to be protected by the implementation of LEZ3. Annex A on page 45 showed (for Variant 1) that over 15% of those worst affected by poor air quality were due to be protected by the implementation of LEZ3 on 4 October 2010. See:

<http://www.tfl.gov.uk/assets/downloads/roadusers/lez/lez-supplementary-information-november2006.pdf>

Phases 1 and 2 of the LEZ entered into force on 4 February and 7 July 2008 respectively.

Mayor Johnson announced his decision to suspend LEZ3 to an unspecified date on 3 February 2009 (famously the day when London drew to a standstill due to snow). See:

<http://www.tfl.gov.uk/corporate/media/newscentre/archive/11096.aspx>

CCAL has said repeatedly it is irresponsible and wrong of the Mayor to postpone LEZ3 most notably on 3 February 2009 and in responses to consultations including:

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## 17 November 2009 – Consultation with London Assembly and Functional Bodies

“CCAL opposes strongly the delay of Phase 3 of the LEZ and urges the Mayor to introduce by January 2011 one or more inner LEZs along the lines of the Berlin scheme (i.e. to coincide with the possible removal or the WEZ or otherwise).”

## 11 January 2010 – Consultation on the draft Transport Strategy

“CCAL objects to the delay of Phase 3 of the LEZ.”

CCAL continues now to oppose the delay of LEZ3 to 3 January 2012. Measures such as this are needed now not in future years. The Mayor must take more urgent, more radical action now to improve air quality throughout London and ensure full compliance with air quality laws.

## **Substantial information shortfall in three air quality-related consultations**

You will appreciate that with consultations ongoing about the postponement of LEZ3 and the removal of the WEZ it is important to have a clear understanding of the context of those consultations. In this respect the Integrated Impact Assessment for the draft AQS is a vital document and we note it has still not been published. In the absence of that document, and in the absence of the requisite information in the LEZ3 consultation papers themselves, CCAL is prevented from responding fully to the LEZ3 consultation (or on those relating to the draft AQS or the WEZ), including in relation to whether the proposed deferral of LEZ3 to January 2012 is compatible with the UK’s obligation under air quality laws.

Please would you publish the following information as a matter of urgency and in a way that will readily bring it to the attention of the public:

- a) the health study with estimates of premature deaths due to dangerous airborne particles, broken down by borough and ward across London. CCAL has previously requested this information under FOIA / EIR and was told on 12 May 2010 that “the expected release date is soon”. CCAL has also requested a review of the decision to refuse the release of this information. It is imperative that the information is published now as part of each of the three consultations, and in good time for consultees to consider it fully;
- b) modelling or estimates of the likelihood of the PM<sub>10</sub> daily limit value being breached in 2011 in London if LEZ3 were to be postponed. In particular:
  - i. the modelling undertaken of the impact of the removal of the LEZ3 (including of the highest mean concentrations of annual mean PM<sub>10</sub> within ‘concentration contours’ shown in Figure 6-2 on page 46 of the ‘Variation Order 1 Integrated Impact Assessment (Final Report May 2010)’);
  - ii. any modelling of the impact of mitigation measures (e.g. those referred to in ‘Box 9’ on page 63 of the draft AQS);
  - iii. any assumptions underpinning the above modelling;

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- iv. the TfL commissioned study of measures to address concentrations at ‘priority locations’ based on international best practice (as referred to in ‘Box 9’ on page 63 of the draft AQS).
- c) modelling or estimates of the likelihood of the NO<sub>2</sub> annual mean and hourly limit values being breached in 2010, 2011 and 2012 in London (including in the area shown in Figure 6-2 on page 46 of the ‘Variation Order 1 Integrated Impact Assessment (Final Report May 2010)’), and the likelihood of maintaining annual mean concentrations of NO<sub>2</sub> below 60 µg/m<sup>3</sup> in each of those years, if LEZ3 were to be postponed. In particular:
- i. the modelling undertaken of the impact of postponing LEZ3;
  - ii. any modelling of the impact of mitigation measures (e.g. of the type for PM<sub>10</sub> referred to in ‘Box 9’ on page 63 of the draft Air Quality Strategy);
  - iii. any assumptions underpinning the above modelling;
  - iv. any related work done for TfL by ERG/King’s College London, TRL or others, equivalent to that undertaken for PM<sub>10</sub>.
- d) details of any measures that were considered for inclusion in the draft AQS, but ultimately rejected, and the reasons for such rejection. In particular, the modelling undertaken of the likely impact of these measures on air quality (referred to in Section 1.6 of the draft AQS).

As you will be aware, fair consultation must take place at a time when proposals are still at a formative stage; sufficient reasons must be given for proposals to enable consultees to give those proposals intelligent consideration and to provide an intelligent response; adequate time and opportunity should be given for a response; and the product of the consultation must be conscientiously taken into account by the authority when reaching its decision: *R v Brent LBC ex p Gunning* (1985) 84 LGR 168, approved in *R v North and East Devon Health Authority ex p Coughlan* [2001] 1 QB 213.

The continuing failure to provide the information above means that CCAL and other consultees are unable to give intelligent consideration or an informed response to the various options being consulted on. It is difficult to think of information which could be more relevant to the public consultation on the postponement of LEZ3 than that which shows the health impact of poor air quality in each part of London, and the extent to which the postponement of LEZ3, the removal of the WEZ and the Mayor’s other air quality proposals will result in air quality laws continuing to be breached.

If this information is not provided in good time, and at least 21 days prior to the end of each consultation, we reserve the right to challenge this and other current consultations, and any decision taken following those consultations, in particular on the basis that such consultation has been inadequate and has failed to meet accepted public law standards.

TfL therefore should extend the deadline for comments on the current LEZ3 consultation by three or more weeks.

The failure to publish important information with the current air quality-related consultations points to serious failings by London government and a lack of fairness.

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## **Impacts**

The impacts of delaying LEZ3 from 4 October 2010 are serious for public health and the UK’s ability to comply with air quality laws in London. By way of illustration only paragraph 6.16 on page 40 of the ‘Revised Mayor’s Transport Strategy Integrated Impact Assessment: Report on the Assessment of the Proposal to Defer Low Emission Zone Phase 3 from 2010 to 2012’ (IIA for LEZ3) states:

*“The effect of implementing Phase 3 in January 2012 rather than October 2010 is to defer and somewhat reduce the benefit in terms of the emissions of air quality pollutants (by around 10% for PM<sub>10</sub> and around 20% for NO<sub>x</sub>).”*

The costs of implementing LEZ3 are described in paragraph 5.6.35 on page 35 of the IIA LEZ3 states:

*“2010 [one-off] compliance costs for operators were expected to be in the region of £115-130m. In 2012 this is expected to fall to between £85m-£100m, resulting in an approximate reduction in compliance costs of around £30m.”*

It is irresponsible of the Mayor to postpone LEZ3 as he is doing. To implement the scheme urgently and mitigate the financial impact on vulnerable operators, CCAL urges the Mayor most strongly to use part or all the £55m net annual income from the WEZ to subsidise retrofit and scrappage costs for the most vulnerable operators. Amongst other things this would create a valuable precedent for linking directly road user charging with public health benefits and ‘green’ jobs.

## **Other comments or observations on LEZ3 consultation proposal**

CCAL has no further comments here on the implementation of LEZ3 on 4 October 2010 or ‘never’ since the Consultation dismisses these as ‘no longer feasible’ or not for consultation. CCAL has the following further comments or observations on the proposed postponement of LEZ3 until 3 January 2012:

### 1. Boroughs say plans are inadequate

According to a response to Mayor’s Questions dated 19 May 2010, six boroughs have expressed concern since 1 November 2009 about the UK complying with EU limit values for PM<sub>10</sub> or NO<sub>2</sub>. These include: City of London; Hillingdon; Camden; Enfield; Redbridge; and the City of Westminster. See:

<http://mqt.london.gov.uk/mqt/public/question.do?id=31135>

**Which borough has expressed what concern about which limit value and when? Will the Mayor publish the information? Why are these important concerns not mentioned in the three current consultations i.e. the postponement of LEZ3, the draft AQS and the removal of the WEZ?**

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## 2. ‘Most stakeholders’ support the [urgent] implementation of LEZ3

Paragraph 2.6.5 of the IIA LEZ3 states:

*“During the consultation on the MTS [Mayor’s Transport Strategy], a number of responses were received that related to LEZ Phase 3 which give an insight into the various stakeholder concerns. While most stakeholders supported the continued implementation of LEZ Phase 3 [in October 2010] and associated environmental benefits, a number of stakeholders (especially those representing business interests) noted the impacts of the recession and the potential economic impact of LEZ Phase 3 on small businesses.”*

As early as 18 March 2009, the London Assembly passed the following motion:

*“This Assembly expresses its concern at the Mayor's stated intention not to proceed with implementation of stage three of the Low Emission Zone in 2010. The Assembly calls on the Mayor to proceed with implementation of stage three in 2010 as originally planned, so as to improve London's air quality and the health of Londoners, and help meet European air quality standards.”*

[http://www.london.gov.uk/media/press\\_releases\\_london\\_assembly/assembly-calls-mayor-reinstate-lez-plans](http://www.london.gov.uk/media/press_releases_london_assembly/assembly-calls-mayor-reinstate-lez-plans)

### **Why has the Mayor not listened to stakeholders and the London Assembly?**

## 3. Defra’s plan has ‘no margin for error’ and (wrongly) includes WEZ

CCAL notes the extraordinary admission in paragraphs 5.6.25 and 5.6.26 on page 33 of the IIA for LEZ3:

*“Defra has undertaken modelling of London’s air quality in 2011 to inform its submission to the European Commission for an extension to the PM<sub>10</sub> EU limit value deadline from 2005 to 2011. Their modelling only included current measures (e.g. the two initial phases of the Low Emission Zone affecting HGVs, buses and coaches; some hybrid buses etc) as well as natural turnover and national measures. Defra’s modelling showed that even without taking further action (i.e. not implementing LEZ Phase 3) London should be compliant with EU limit values by 2011. **However, there was no margin of safety** [CCAL emphasis]. This is a significant risk to compliance with EU limit values given the variations in air quality year by year due to changes in weather conditions and the contribution from external sources.*

*“Consequently, not introducing LEZ Phase 3 at all would reduce the certainty of the EU limit values for PM<sub>10</sub> being met in 2011.”*

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For further details see:

<http://www.tfl.gov.uk/assets/downloads/roadusers/lez/LEZ/LEZ-VO-Impact-Assessment-May-2010.pdf>

You will be aware that Article 22 of the Directive requires that a Member State ‘*shall demonstrate how conformity of will be achieved with the limit values before the new deadline*’. Commission guidance similarly requires that predictions of how PM<sub>10</sub> levels are likely to fall must be ‘*realistic and reliable*’.

It is clear, even from the IIA for LEZ3, that hot weather and/or transboundary air pollution would/scupper/ing the UK’s chance of achieving full compliance with the PM<sub>10</sub> daily limit value throughout London – which is a key requirement of a time extension being granted.

Furthermore, with the TEN including the WEZ, when the Mayor has said he will remove it, it seems even more ridiculous to propose postponing LEZ3 to January 2012. Surely this evidence will add to the pressure on the Commission to reject the UK’s renewed application for a time extension for PM<sub>10</sub>.

**Will the Mayor accept finally, after two years of backward steps by him on air quality, that a time extension for PM<sub>10</sub> until 2011 cannot be justified? What else does the Mayor know about the likelihood of infraction action that could cost up to £300m per year per pollutant?**

#### 4. Mayor must publish health study with local breakdowns

The original impact assessment for LEZ3 was prepared when Londoners thought there were 1,031 premature deaths in 2005 due to PM<sub>10</sub>. On 28 March 2010, the Mayor estimated there are some 4,300 premature deaths a year in London due partly to long-term exposure to dangerous airborne particles (with a cost of some £2bn a year). With the health impact of poor air quality realised to be much worse than before it is irresponsible of the Mayor to be postponing key mitigation measures not implementing them.

**What can be more important than knowing who is affected by poor air quality so people: are warned about the health risks; can express their concerns; and can propose and request measures that are targeted appropriately? How have these new numbers changed the economic case for LEZ3? When will the Mayor’s health study be published?**

#### 5. Failure to publish key reports showing the (successful) impact of the existing LEZ

CCAL submitted Freedom of Information/Environmental Information Regulation requests relating to LEZs on 12 April 2010. TfL responded by releasing several documents to CCAL on 30 May and 7 June subject to copyright and other restrictions i.e. well after the current consultation period was launched for LEZ3 on 17 May. These include:

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- i. ‘An analysis of air quality data to determine the impact of the London LEZ – 2004 to 2008’ by AEA dated January 2010 (33 pages);
- ii. ‘Emissions related charging: Impact on the vehicle market (Final report for TfL, August 2007)’ by Experian (57 pages);
- iii. ‘(Category 3 Air Quality Monitoring) Analysis of Air Quality Data – LEZ Year 1 (2008/09) Results by King’s College London and the University of Leeds dated May 2009 (119 pages); and
- iv. ‘National Travel Survey – Analysis of travel trends for London’ dated June 2008’ (19 pages).

Amongst other things, these studies show the LEZ is working and provide further evidence the Mayor was wrong to postpone LEZ3. Indeed, the preliminary assessment made by the first of those reports says *“The report notes potentially significant trends in levels of black carbon and PM<sub>2.5</sub> [i.e. fine particulate matter] across the period of scheme implementation”*.

These key studies do not seem yet to be available to the general public to inform their response to the LEZ3 and other air quality-related consultations.

**Why was it necessary for CCAL to seek this information under the FOIA / EIR? Why were these studies not published before the LEZ3 consultation was launched on 17 May 2010? Does the Mayor accept these omissions point to serious failings by London government and a lack of fairness? When will these studies be published?**

6. Mayor seems to think of ‘inequality’ in terms of ‘access to minibuses’ rather than lives cut short

Paragraph 5.6.41 on page 36 of the IIA for LEZ3 states:

*“In addition, the Equalities Impact Assessment undertaken to guide the development of the scheme, identified that young people, older people and disabled people were seen to be more reliant on minibuses for transport. Charities, schools and similar bodies are likely to be smaller organisations, less able to absorb additional costs to meet the new LEZ standards. This situation would have been exacerbated by the recent recession which has affected charitable giving and the availability of grants from funding organisations.”*

How much weight, if any, has been put on the inequality arising from non-white British being exposed, on average, to 17% more of the deadly PM<sub>10</sub> than white-British and black-British being exposed, on average, to 30% more of the deadly PM<sub>10</sub> than white-British?

**Does the Mayor think of inequality in terms of ‘access to minibuses’ (though important) rather than lives cut short by air pollution?**

7. Mayor must abide by public health laws

Paragraph 6.1.7 on page 41 of the IIA for LEZ3 says:

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*“The overall assessment of the proposal [to postpone LEZ3 to 3 January 2012] is finely balanced but in light of the factors set out above it is assessed as positive. This reflects that the negative impacts of the proposal are assessed as minor in magnitude – as impacting upon the environment and human health – and the positive impacts as moderate in magnitude – as impacting upon socio-economic factors.”*

This seems to be a subjective, even whimsical, judgement which fails to take account of the need to comply with air quality laws to protect public health.

**Does the Mayor think public health laws are optional – that they do not need to be complied with in full? Let’s remember, dying prematurely is even worse than losing your job.**

## 8. Impact assessment focuses on NO<sub>x</sub> not NO<sub>2</sub>

Paragraph 5.6.24 on page 23 of the IIA for LEZ3 states in respect of compliance with the NO<sub>2</sub> limit values:

*“Assuming an extension is given, the date for achieving EU limit values for NO<sub>2</sub> will be 2015. Whilst LEZ Phase 3 is targeted at PM<sub>10</sub> emissions, where newer vehicles replace older ones NO<sub>x</sub> benefits are also provided by the scheme which complement other proposals set out by the Mayor. These proposals include a taxi strategy, a new NO<sub>x</sub> standard for HGVs, buses and coaches as part of LEZ from 2015, to address NO<sub>x</sub> emissions. Together with LEZ Phase 3 these play an important role in improving air quality in London, including reducing concentrations of NO<sub>2</sub> helping towards meeting relevant EU limit values.”*

This is wholly inadequate.

**How can we comment intelligently on a proposal that fails to: tell us about its direct impact on NO<sub>2</sub> limit values; tell us what will happen if a time extension is not obtained; and does not address how annual mean concentrations of NO<sub>2</sub> will be kept below 60 micrograms per cubic metre (µg/m<sup>3</sup>) (which is a legal requirement) if a time extension is obtained?**

## 9. Consultation documents fail to provide detail on PM<sub>10</sub> population or area exposure or risk of limit values being breached

Variant 1 in Annex A of a report titled ‘Proposed London Low Emission Zone Scheme Description and Supplementary Information’ dated November 2006 showed that over 15% of those worst affected by poor air quality (PM<sub>10</sub> and NO<sub>2</sub>) were expected to be protected by the implementation of LEZ3 on 4 October 2010. See:

<http://www.tfl.gov.uk/assets/downloads/roadusers/lez/lez-supplementary-information-november2006.pdf>

Similar information is omitted from the current consultation along with rafts of other crucial information.

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**How can we comment intelligently on a proposal that fails to: tell us about its direct impact on PM<sub>10</sub> limit values; tell us what will happen if a time extension is not obtained; and does not address whether annual mean concentrations of PM<sub>10</sub> will be breached anywhere in London having been attained?**

10. Mayor champions ‘white van man’ but not retrofit and other ‘green’ jobs

Paragraph 5.6.40 on page 38 of the IIA for LEZ3 says:

*“Relative to the option of introducing Phase 3 in 2010, the [2012] proposal is predicted to have a positive economic impact during the deferral period on those people who use large vans and minibuses, many of the latter being owned and operated by community groups such as schools and charities which contribute to London’s rich educational, cultural, heritage and sporting life. Some will have been especially adapted (e.g. to make them wheelchair accessible) at additional cost and may not be easy to retrofit due to their age.”*

**What is the total cost to ‘green’ industries and jobs of the Mayor’s decision to decide to suspend a measure which he admits is important for compliance with air quality laws? Has the Mayor taken into account all relevant costs in his latest proposal(s)?**

11. £300m fines per year for each pollutant:

CCAL is pleased there is an official recognition at last that EU fines are ‘potentially in the region of £300 million per year for each pollutant’. See paragraph 5.48 in the ‘London Low Emission Zone Variation Order: Proposed deferral of the inclusion of larger vans and minibuses in the LEZ from 2010 to 2012’:

<http://www.tfl.gov.uk/assets/downloads/roadusers/lez/LEZ/LEZ-VO-Supplementary-Information-May-2010.pdf>

The Mayor is wrong to assume the UK will obtain a time extension until 2011 for PM<sub>10</sub> and 2015 for NO<sub>2</sub> to comply with limit values. Further, even if a time extension were to be obtained for NO<sub>2</sub>, it is unclear from any of the Mayor’s current air quality related-consultations (i.e. LEZ3, draft AQS or WEZ) whether the annual mean concentrations would be kept below 60 µg/m<sup>3</sup> from 1 January 2010 which would be a requirement of such a time extension. CCAL considers the UK does not meet the requirements for a time extension for either PM<sub>10</sub> or NO<sub>2</sub> in London.

**Under what precise legal power or duty does the Mayor believe he can choose to prioritise ‘economic benefits’ over the need to comply fully with public health laws?**

These are significant omissions individually but, collectively, they suggest serious failings by London government and a lack of fairness.

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## **Inner London low emission zone**

CCAL has urged the Mayor of London and TfL on numerous occasions, including in very detailed submissions, to introduce one or more additional inner low emission zones (or ‘Clean Air Zones’) in London. This or these would be in addition to LEZ3 and would ban the most polluting diesel vehicles from the most polluted parts of London.

You are aware there were some 40 such inner LEZs in Germany by the end of 2009 with scores more across Europe. See:

<http://www.lowemissionzones.eu/>

CCAL continues to advocate strongly the implementation of one or more of these additional inner LEZs in London. The implementation earlier or simultaneously of a stronger, Berlin-style, inner LEZ might allow the Mayor to slow the tightening of the outer LEZ (all other things being equal). CCAL is not repeating details here, since both the Mayor and TfL have long had such a proposal from CCAL, but would be pleased to meet the Mayor or senior TfL officials to discuss it.

## **Close**

Please contact me if you have any questions or would like more information on any of the points raised in this letter.

With best wishes.

Yours sincerely

Simon Birkett  
Founder  
Campaign for Clean Air in London

Enclosures

Cc: By hand:

Winston Fletcher, Chair, The Knightsbridge Association  
Carol Seymour-Newton, Honorary Secretary, The Knightsbridge Association

Cc: The Rt. Hon Andy Burnham, Secretary of State for Health  
The Rt. Hon. Philip Hammond MP, Secretary of State for Transport  
The Rt. Hon. Chris Huhne MP, Secretary of State for Energy and Climate Change

# CAMPAIGN FOR CLEAN AIR IN LONDON

*“The cross-party campaign to achieve urgently and sustainably at least World Health Organisation recommended standards of air quality throughout London”*

Campaign website: [www.cleanairinlondon.org](http://www.cleanairinlondon.org)

The Rt. Hon. Andrew Lansley MP Secretary of State for Health  
The Rt. Hon. Caroline Spelman MP, Secretary of State for Environment Food and Rural Affairs  
Norman Baker MP, Minister Department for Transport  
Lord Henley, Minister for Air Quality

## **ORGANISATIONS**

Helen Ainsworth, EU and International Air Quality, Defra  
Jenny Bates, London Regional Campaigns Co-ordinator, Friends of the Earth  
The Lord Coe  
Peter Daw, Interim Strategy Manager (Air Quality, Energy and Climate Change), GLA  
Martin Powell, Acting Environment Adviser to the Mayor of London  
Louise Duprez, EU Policy Unit, European Environmental Bureau  
Rupert Furness, DfT  
Daniel Instone, Defra  
Dame Judith Mayhew, Chair, New West End Company  
Daniel Moylan, Deputy Chair, Transport for London  
Philip Mulligan, Chief Executive, Environmental Protection UK  
Derek Picot, Chairman, The Knightsbridge Business Group  
The Lady Valentine, Chief Executive, London First  
Tim Williamson, Deputy Senior Reporting Officer, Defra

## **LEADING POLITICIANS**

Jean Lambert MEP, Green  
Baroness Ludford MEP, Liberal Democrat  
Claude Moraes MEP, Labour  
Charles Tannock MEP, Conservative  
Gareth Bacon AM, Conservative, London Assembly Member  
James Cleverly AM, Conservative, Environment Committee, London Assembly  
Roger Evans AM, Conservative, Environment Committee, London Assembly  
Nicky Gavron AM, Labour, Environment Committee, London Assembly  
Darren Johnson AM, Green, Chair of the Environment Committee, London Assembly  
Caroline Pidgeon AM, Liberal Democrat, Deputy Chair of the Transport Committee  
Murad Qureshi AM, Deputy Chair, Environment Committee, London Assembly  
Valerie Shawcross AM, Labour, Chair of the Transport Committee, London Assembly  
Mike Tuffrey AM, Liberal Democrat, Environment Committee, London Assembly