

TRANSPORT FOR LONDON

BOARD

**SUBJECT: TFL'S RESPONSE TO THE MAYOR'S AIR QUALITY STRATEGY
PUBLIC DRAFT CONSULTATION**

DATE: 23 JUNE 2010

1 PURPOSE AND DECISION REQUIRED

1.1 This paper seeks the Board's approval to issue the attached draft response to the Mayor's Air Quality Strategy (MAQS) public draft.

2 BACKGROUND

2.1 The MAQS was published for consultation with the public on 28 March 2010. The consultation period ends on 23 July 2010.

2.2 An earlier version of MAQS was consulted on with the London Assembly and Functional Bodies in late 2009. TfL provided a response.

2.3 Appendix 1 sets out a draft TfL response to the Mayor's Air Quality Strategy public draft consultation that would be sent from the Commissioner to the Mayor.

3 RECOMMENDATION

3.1 The Board is asked to APPROVE the proposed TfL response to the public draft consultation of the Mayor's Air Quality Strategy set out in Appendix 1.

4 CONTACT

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TfL RESPONSE TO THE MAYOR'S AIR QUALITY STRATEGY PUBLIC DRAFT CONSULTATION

Your ref:

Our ref:

Boris Johnson
Mayor of London
Greater London Authority
City Hall
More London
The Queen's Walk
London SE1 2AA

Date

Dear Boris,

Mayor's Air Quality Strategy Public Draft

Thank you for the opportunity to comment on the Mayor's draft Air Quality Strategy which is being consulted upon with members of the public and stakeholders. These comments build on Transport for London's response to the Assembly and Functional Bodies draft.

Transport for London welcomes the draft Strategy. Air quality is a major challenge facing London and it is imperative that action is taken to help London reduce the overall concentrations of pollutants in the air that adversely affect the health of Londoners and to ensure that national and European targets for air quality are met.

The draft Air Quality Strategy sets out a range of measures which demonstrate London's commitment to taking action. The Strategy will deliver a 13 per cent reduction in PM10 emissions in central London in 2011 (compared to 2008), helping to ensure that London meets relevant EU limit values. For NO2, the Strategy will deliver a 35 per cent reduction in emissions in Greater London by 2015 (compared to 2008), although further action from central Government will be required if the EU limit values for NO2 are to be met. These substantial reductions in emissions are to be welcomed.

These reductions in emissions are delivered from a number of sources. The first six policies in the draft Air Quality Strategy seek to reduce emissions from transport and complement the approach set out in the Mayor's Transport Strategy. TfL has continued to work directly with your Environment Advisor and GLA team in refining these and greater detail has been included in the public and stakeholder draft.

Transport for London is responsible for delivering many of the measures included in the Strategy and a key focus is making sure that this is done effectively. We are working with stakeholders such as London Councils, the London boroughs and the taxi and freight industries to develop the detail of the proposals and to address the practicalities involved.

Work is already underway to implement key measures to ensure timely action to help meet the EU limit value for PM10 in 2011. On 17 May 2010, Transport for London commenced a six week public and stakeholder consultation on changing the start date for the large van and minibuses phase of the Low Emission Zone from October 2010 to January 2012. Transport for London will submit a report to the Mayor on the consultation in due course. The large van and minibuses phase of the

Low Emission Zone is expected to play an important role in adding further confidence that London will meet the EU limit value for PM10 in 2011 through pre-compliance.

Funding remains a critical issue. Transport for London's Business Plan for the period 2010/2018 is under huge strain. As you are aware, savings of more than £5 billion have already been identified over the Business Plan period and the new Government is consulting you upon a cut to the TfL Grant of £108 million in this financial year. Many of the measures proposed in the draft Strategy will require additional funding, and therefore the ability for any of these to be accommodated within TfL's Business Plan is extremely limited in that context.

TfL is working hard to minimise the additional costs as far as possible. For example, wherever possible, air quality improvements will be delivered as parts of existing schemes or projects. Nevertheless, further support from central Government will be required if the full package of measures included in the draft Strategy is to be implemented. Transport for London considers it is appropriate for central Government to provide this additional support as London has already invested significantly in improving air quality and has delivered innovative policy solutions such as the world's largest city-wide Low Emission Zone.

In addition to supporting the Mayor's transport measures, central Government has to take action itself. This reflects the national nature of the air quality problem in the UK, especially for NO₂, and the relative efficacy of national action compared with action taken just in cities like London. This action takes two forms:

First, central Government can support the delivery of certain initiatives which the Mayor has proposed. Effective mechanisms are needed to mitigate, as far as possible, the cost for operators of meeting new standards for HGVs, buses, coaches, LGVs, minibuses and taxis. This could be done through an extended scrappage scheme and / or grant programmes for retrofitting abatement equipment (as is done in other EU countries). To support implementation, central Government would need to deliver a national certification and testing regime for NO_x abatement equipment before the Low Emission Zone could include a NO_x standard.

Second, central Government can take its own action. It is best placed to help create an environment which incentivises ultra-low emission vehicles, such as electric vehicles. Only central Government can make changes to the tax system to better incentivise cleaner vehicles and address the issues associated with 'dieselisation'. Other measures will also be required and these are listed in the draft Air Quality Strategy.

Transport for London is currently involved, with the GLA, in a series of meetings with the Department for Environment, Food and Rural Affairs and other government departments to discuss potential national measures and vital support for London action in more detail.

In addition to central Government, boroughs will also need to take appropriate action to fulfil their responsibilities for local air quality. Transport for London is committed to supporting the boroughs in making local air quality improvements and changes to the Local Implementation Plans have been proposed to achieve this.

Transport for London looks forward to continuing to work closely with you as the draft Strategy is finalised and implemented.

Yours sincerely

Peter Hendy