



Introduction

LSx (www.lsx.org.uk) is a think and do tank that aims to create collaborations that address the complex barriers to a sustainable London. In particular, LSx's Air Quality Programmes have been working with schools and communities around London and identified that the levels of air pollution (specially in regard to NO₂ and Particulate matter) exceeds the legal limits and it is far to follow the recommendations from the World Health Organisation. Furthermore we have identified the need to specifically target health and planning policy in London. For these reasons, we welcome the opportunity to comment on the Mayor's consultation on his measures to tackle air pollution in London.

Our response to this consultation is informed by LSx's direct experience of delivering our behaviour change programme of work, aimed at improving air quality and public health across London. Our programme includes the following projects:

- Cleaner Air 4 Communities
- Cleaner Air 4 Schools
- Well London
- Other projects tackling wider issues such as health and well-being

Involvement in these has given us insight into public attitudes and behaviours towards public services, a knowledge of the relative effectiveness of different elements of campaigns and projects, how public opinion influences local infrastructure needs and, crucially, an understanding of how best to effect lasting change in behaviours. Moreover we have consulted our beneficiaries directly about the DEFRA's public consultation on the implementation of Clean Air Zones in England by interviewing the participants at our public events and by hosting a Webinar on this subject.

Consultation Questions & LSx Response

LSx's communities welcome the DEFRA consultation on the implementation of Clean Air Zones (CAZ) in England. We feel the current framework as a significant step towards meeting legal pollution levels in England, but we consider that this framework is not completed, lacks ambition and fails to provide information regarding implementation dates, charging rate, guidance on size and locations, accreditation scheme that recognizes emissions in real driving tests, and details on how CAZ will be enforced. Regarding the number of cities that should implement CAZ, this number should be updated to 26 cities.

Moreover, it seems that there is too much reliance on a voluntary approach from the local authorities. There should be a stronger level of standards expected of the local authorities if we want the Clean Air Zones to be a success. The decrease of reporting should not be equal to a lesser interest in this matter by the local authorities. Bellow we provide detailed responses to each proposal.

1) Are the right measures set out in Section 2?

The Clean Air Zones framework's general approach is based in 5 aspects: emission standards, minimum requirements, supporting local growth and ambition, accelerating transition to a low emission economy and immediate action to improve air quality and health. We believe these constitute a good skeleton to build up an ambitious framework, but we feel that each aspect is not explored in depth and provides little information about policy.

Regarding emission standards, the implementation of real driving emissions monitors on the roads is fundamental to understand realistic emission performances. From the information available, we know that Euro VI vehicles are a large improvement upon Euro V for heavy vehicles, but cars and light vans with Euro 6 do not have such a large improvement, and for this reason, we would like to propose Euro 6 to be charged as well. Overall, we believe that there is a need for better monitoring and modelling, and Euro standards should be updated accordingly.

The minimum requirements presented in this draft are not very specific and do not provide a framework for local authorities. More guidance should be provided here, especially in regard to develop an effective response from the Local Authorities.

Planning is briefly mentioned but the need to develop effective planning frameworks and guidance which local authorities could use is not referred. In order to effectively implement CAZ, local authorities should consider that all new developments should be required to be air quality neutral. Local authorities should also take increased pollution into account on every planning application, for example this should reflect how tall buildings can contribute to build up of pollution, and design 'step back' from the building line in order to reduce the impact. Alongside that all new development contribution to borough wide reductions in pollution such as the development of logistic centres to reduce diesel fumes in our city through the Community Infrastructure Levy.

More local provision of charge point infrastructure for electric vehicles and low emission car club parking spaces, secure cycle parking and cycle ways of course are essential – however the logistics in terms of planning, and providing the power to charge electric vehicles may prove challenging in the short term. Planning is fundamental to lead local authorities to a low emission economy and more guidance should be provided here. Planners and developers need continued support through guidance and continuously being made aware of the need for these measures.

Moreover, there is no detailed information about how the government will support the transition to a low emission economy. We believe that there should be support from the government, especially in regard to scrappage schemes, retrofit and in use testing and monitoring. A more combined national and local role will be more effective in implementing CAZ.

2) Are there additional measures that should be highlighted under each theme? Please give evidence of impact if possible.

The present consultation does not dissect the aspect of finding effective ways to engage the public, which is fundamental to effectively implement Clean Air Zones and tackle pollution. We believe this is fundamental to encourage:

- a) Attitudinal change by increasing the public's perception of air quality as a key issue that affects them and their families and their support of continued air quality;

- b) Behaviour change, by increasing the public's switch towards cleaner travel modes and efficient driving techniques;
- c) Adaptation to minimise the health impacts of pollution, such as avoiding the most polluted streets.

It is fundamental to develop a proper segmentation model, and local authorities are still lacking experience in this aspect. An evidence-base framework is fundamental in order to identify best social marketing strategies and in our opinion, DEFRA should highlight this aspect in this consultation.

3) In addition to the draft Framework, are there other positive measures that (a) local or (b) central government could introduce to encourage and support clean air in our cities?

Considering that local authorities have little resources, they should explore alternative sources of revenue, in order to lead an efficient implementation of CAZ. We are aware that some local authorities are introducing a specifically designated electric vehicle loading bays, to encourage van owners and fleet managers. Encouraging, engaging and exemplifying business from start-ups to multi-nationals will provide the additional focus for the Clean Air Zones, as both central business districts and local high-streets both gain from this.

Central government have established The Office for Low Emission Vehicles (OLEV) to position the UK at the forefront of ULEV development, manufacture and use, including targeted funding for the rapidly expanding infrastructure. LSx communities agree that the national government needs to implement three core policy approaches in order to support and implement Clean Air Zones in England: Scrappage scheme, Retrofit of existing vehicles and Increase real-world testing of vehicle standard.

4) Are the operational standards and requirements set out in Section 3 and Annex A of the Framework acceptable?

We believe that the present operational standards and requirements set out in Section 3 fail in providing tools to support local authorities to implement these measures. From our experience, we understand the importance of working at a local level to get community buy in to delivering the changes that are necessary - our work with local authorities and local community groups has identified additional air quality problem hotspots and local air quality issues, which might otherwise have remained unknown. A local role is important to integrate actions with the local planning regime. However, we also recognise that there is limited expertise and resource at a local level, so adequate training and support for officers including planner will be required.

All cities should work with DEFRA to reduce the dependence on diesel in the economy, and for this to happen we will need a joined up approach with all cities working with DEFRA on a consistent programme. We believe that these requirements are unlikely to reduce pollution required to bring it in line with healthy guidelines.

5) Do you agree that the requirements in Clean Air Zones for taxis and for private hire vehicles should be equivalent?

Given that Clean Air Zones will include both taxis and private hire vehicles, a recognition that these are often spontaneous selection of this transport mode, particularly in the case of taxis, and hence through policy planning could mean that the actual usage of this mode of transport

needs to be aligned to the requisite amount of charging infrastructure i.e do all taxi or private hire vehicle owners have access to charging facilities for instance.

6) Do you agree the standards should be updated periodically?

Our recommendation would be to aim for a higher standard of emission, this would both ensure that the manufacturers have the certainty to adapt their commercial frameworks, local authorities can start monitoring accordingly, and their procurement departments could gain from both the cost savings on traditional fuels for instance.

7) If yes, do you agree that the minimum vehicle standards set out in the Framework should remain in place until at least 2025?

The minimum vehicle standards could be helped through encouraging alignment in long-term fleet decisions, and as a result the minimum standards need to be aligned to the government ambition of reaching the 2040 target.

8) Do you agree with the approach to Blue Badge holders?

Whilst the requirements of blue badge holders, need to be factored into the planning for these Clean Air Zones, the administrative arrangements such as lists of exempted vehicles need to be carefully planned to ensure that appropriate information on the usage of blue badged vehicles is appropriately monitored.

As there are often other local authority measures, delivery and management costs such as the construction of blue badge holder designated parking bays at their homes, specifically designed interventions could be designed for example through the appropriate Motability, Dial-a-Ride and NHS transport services, reflecting the need for appropriate guidance on long-term fleet planning as referred to above.

9) Is the approach set out suitable to ensure charges are set at an appropriate level?

As local authorities are central to the implementation of these policies and our current understanding of these plans, are that they will need to deliver the road charging and vehicular management aspects of these policies. We would also recommend that the air quality aspects would be assessed according to individual local authorities undertaking their own consultations, to deal with more granular aspects, such as differential parking charges, echoing London's introduction of increased parking charges for diesel vehicles.

Setting the cost of Clean Air Zones need to reflect the need for both addressing air quality issues, but given the fact that much of the road traffic being charged by the local authority. Safeguards on clean air could also spur more effective spatial development, such as green roofs, increased urban foliage and living walls within a wider framework of green infrastructure, which would then create both the necessary improvements in air quality, but also ensure that there is an appropriate amount of visibility for this policy, as the road charging scheme would then be introduced whilst a similar package of highly visible improvements to the urban landscape are being adopted. Appropriate safeguards would include for instance working within current funding and administrative frameworks, as the draft secondary legislation reflects. Working with relevant industry bodies such as the Freight Transport Association would

ensure that fleets can be sustainably transitioned to interim fuels and thus generate lower emission options.

To achieve this at the following approach would create a priority for ensuring that there is some logical basis to making this transition in the vehicle fleet: Buses, lorries/large vans and small vans/cars.

The key cost benefit would be through restricting heavily polluting vehicles from the city centre, thus increasing the air quality of the city centres, reducing the costs to the health economy and through appropriate engagement with fleet managers, manufacturers and other supply chain stakeholders, this policy could create the relevant improvements in air quality and enable the UK to make major progress towards the decoupling of fossil fuels from economic growth.

About London Sustainability Exchange

LSx are a think and do tank that provide organisations and networks of individuals with the motivation, knowledge, and connections they need to put sustainability into practice. Our projects provide action-based research to develop, and in turn, share the lessons from our work across London, and most importantly, influence London's policies for a sustainable future.

What we deliver:

We know that information alone doesn't necessarily lead to change. As a consequence, we offer the benefits of living a sustainable lifestyle, working with a myriad of communities and organizations. In all our programmes we identify the impact of our work through a clear monitoring and evaluation framework.

Areas of expertise:

Our energy and resilience programmes engage with communities to empower healthy and sustainable lifestyles, enabling this to be a social norm. These projects often involve identifying the key individuals in a community, who in turn influence their friends and neighbors

Our Green Entrepreneur programme flips the waste paradigm: working with community groups to recast waste as a valuable resource and bring the reuse market closer to a 'tipping point.' Our aim is that communities have a 'social norm' of reuse.

Our Air Quality programme brings awareness of the power of community action for change across London. Supporting communities and schools to establish the hard facts about air quality in their area, use this information to inform their travel behaviors, and in turn through peer to peer influence support their social networks to develop more sustainable travel behaviors. This programme has identified the need to specifically target health and planning policy in London.

Contact Us

London Sustainability Exchange

84 Long Lane

London SE1 4AU

E: info@lsx.org.uk

T: 020 7234 9400

F: 020 7234 9419

W: <http://www.lsx.org.uk>

