



## RAC – Response to Mayor of London’s proposals on air pollution

### About the RAC

With more than eight million members, the RAC is the oldest and one of the UK's most progressive motoring organisations, providing services for both private and business motorists. As such, it is committed to making driving easier, safer, more affordable and more enjoyable for all road users.

The RAC, which employs more than 1,500 patrols, provides roadside assistance across the entire UK road network and as a result has significant insight into how the country’s road networks are managed and maintained.

The RAC is separate from the RAC Foundation which is a transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and their users.

The RAC website can be found at [rac.co.uk](http://rac.co.uk)

For the purpose of the consultation – the RAC is responding as a motoring organisation representing our 8 million motorists, many of whom live or work in London.

### RAC Response

#### **1. Thinking about air quality, how much of a problem, if at all, do you think the cleanliness of the air is in each of the following locations?**

The majority of motorists are concerned about air quality and therefore the RAC believes it appropriate for the Mayor to consider measures to tackle the serious issue of air pollution. We believe the existing proposals to introduce a Ultra-Low Emission Zone are sensible because they give vehicle owners sufficient time to, in the case of individuals buy or lease an alternative vehicle and in the case of businesses to re-profile of their fleets to reduce emissions. Many motorists have bought small fuel-efficient diesel vehicles because of their fuel economy and low carbon dioxide emissions, believing that their choice was environmentally friendly. It is unreasonable to punish them for their choice without giving them a reasonable period in which to adjust. The ULEZ proposals do this, in contrast, for example, to the immediate imposition of a substantial diesel vehicle surcharge on residents parking permits of the type introduced by the London Borough of Islington and the London Borough of Hackney.

With regards to location, we should like to emphasise that poor air quality is fundamentally a local issue, and whilst we acknowledge that London overall needs to reduce its emissions, some areas have far worse air quality compared to others depending on the volume and nature of road traffic.

**2. To what extent do you think each of following is responsible for air pollution in London?**

It is recognised that older, more polluting diesel vehicles, whether they are private, commercial or public sector vehicles are major contributors to the local concentrations of Nitrogen Dioxide and particulates. However, despite the differences highlighted recently between real world nitrogen dioxide emissions and those measured in the standard Euro type approval tests, modern vehicles emit only a very small fraction of the emissions from previous generations of diesel vehicles.

The RAC has noted that some of the worst areas of air pollution recorded in London are where there are high concentrations of buses and taxis (such as Oxford Street, Regent Street and these surrounding areas) and relatively few private vehicles. The RAC also noted that during the 2015 bus strike, levels of nitrogen dioxides in Oxford Street dramatically fell.

<sup>1</sup>

- 3. Some people think that the implementation of the ULEZ should be brought forward to September 2019 in order to improve air quality sooner, while other people think that it will be too costly and problematic for drivers and businesses.**

**To what extent do you agree or disagree that the 2020 ULEZ implementation date should be brought forward to September 2019?**

The RAC believes that 2020 allows a sufficient period of time for motorists to change their vehicles and for businesses to re-profile their fleets. Many businesses are now budgeting and preparing for the 2020 ULEZ introduction date, and bringing it forward may harm some businesses which would in turn impact on London's economy. Our preference is for 2020 to remain in place; however we understand the urgency of tackling air quality, and therefore we believe the Mayor might wish to consider more ambitious targets to tackle the biggest contributors to poor air quality. DEFRA's report on improving air quality published in December 2015 indicated that buses contribute around a quarter of Nitrogen Dioxide emissions from road traffic in London and that HGVs contribute a similar percentage. More ambitious plans to targets London's polluting bus fleet may therefore be appropriate.

The Mayor may also wish to look at opportunities to improve traffic flows in gridlocked areas where idling engines contribute to worsening pollution.

**4. Which of the following areas do you think should be covered by the ULEZ for light vehicles (e.g. cars, motorbikes and vans)?**

---

<sup>1</sup> <http://www.businessgreen.com/bg/news/2394054/oxford-street-pollution-plummeted-during-bus-strike-say-scientists>

- ☒ Current proposed ULEZ/Congestion Charging Zone – Yellow area
- ☐ Inner London (e.g. to the North and South Circular Roads) – Red area
- ☐ The existing London-wide Low Emission Zone (LEZ) for heavy vehicles (i.e. encompassing most of London) – Green area
- ☐ I don't think that there should be a ULEZ for light vehicles at all

There may be other pollution "hot spots" within inner London where local measure may be appropriate. However, it is not appropriate to target areas where concentrations of pollutants do not exceed the legal limits, or are forecast to fall to within legal limits by 2020.

**5. Which of the following areas do you think should be covered by the ULEZ for heavy vehicles (e.g. lorries, buses and coaches)?**

- ☒ Current proposed ULEZ/Congestion Charging Zone – Yellow area
- ☐ Inner London (e.g. to the North and South Circular Roads) – Red area
- ☐ The existing London-wide Low Emission Zone (LEZ) for heavy vehicles (i.e. encompassing most of London) – Green area
- ☐ I don't think that there should be a ULEZ for heavy vehicles at all

There is already a LEZ for heavy vehicles and further measures outside the proposed ULEZ should be confined to those local areas where additional measures are necessary (see Q4 above)

**6. One of the ways the Government could help drivers switch from older, more polluting vehicles is to fund a scrappage scheme or a similar incentive scheme, which would pay vehicle owners (likely to be diesel) part of the cost of replacing their vehicle with a less polluting one.**

Any proposals which can encourage motorists to switch to cleaner vehicles are welcome; however the practicalities of introducing a scrappage scheme are unattractive. The RAC Foundation published a report which suggested that such a scheme would be expensive and would deliver only modest improvements in air quality and would therefore represent poor value for taxpayer's money.<sup>2</sup> The RAC accepts these findings.

The Mayor might wish to consider alternative proposals, such as topping up a Government grant to encourage the further take-up of ultra-low emission vehicles. The Mayor might also wish to consider other non-financial incentives for switching to Ultra Low Emission vehicles

---

<sup>2</sup> <http://www.racfoundation.org/media-centre/diesel-scrappage-scheme-press-release>

such as allowing the cleanest vehicles to use bus lanes at certain times of the day and days of the week, if practical.

7. Vehicle Excise Duty is currently levied on vehicles in the UK, the level of which depends on engine size, fuel type and CO<sub>2</sub> (carbon dioxide) emissions. It is currently set and administered by national government. Funds generated are used to pay for the motorway and major road network outside of London. One option for addressing London's high emissions could be for the Mayor to be given greater control over setting Vehicle Excise Duty for London registered vehicles, to encourage the buying of cleaner vehicles in the city.  
**To what extent do you agree or disagree that London should be given greater control over Vehicle Excise Duty?**

Any such scheme would require approval from the Treasury and the Government has already committed to ring-fencing VED revenue to fund maintenance and development of the strategic road network from 2020. Given the urgent need for investment in the strategic road network in order to sustain both the efficient movement of goods and services and personal mobility, the RAC would not want to see changes to the proposed arrangements for hypothecation of VED.

8. Pedestrianisation involves closing streets to motorised through traffic including cars, buses and taxis. Traffic is rerouted either permanently or at certain times of the day or week.

The RAC has no objection to the occasional closure of residential streets for special events such as street parties, pageants etc. However, we are opposed to road closures as a mechanism for improving air quality because this can be hugely disruptive to both business and individuals for whom there is no practical alternative to cars/commercial vehicles. Such action would also fall outside the Governments proposals to tackle air quality which we regard as balanced and evidence-based

9. Organisations such as the Met Office currently make forecasts on the level of air pollution. It has been suggested that alerts are provided when pollution is particularly high, to help raise awareness of the air pollution levels so that people can make decisions about where and how to travel around London to lessen their exposure to polluted air.

**Would you like to receive information when air pollution is high, in order to take action that would protect your health?**

Yes. The RAC would strongly support these proposals. Such information might encourage motorists and commercial vehicle operators who are considering driving into central London to postpone their journeys or seek alternative modes of transport at times when air quality is particularly poor.

10. We would support all of the following methods to raise awareness:

- Pollution level alerts on electronic road signs
- Updates on social media
- Electronic noticeboards on the underground/bus network
- News channels
- Community noticeboards

**11.** Ahead of the implementation of the Ultra Low Emission Zone (ULEZ) in central London in 2020, the Mayor has proposed the introduction of an Emissions Surcharge, to be introduced in 2017. The Emissions Surcharge would be a daily charge that would reduce emissions by reducing the number of the oldest, most polluting, vehicles driving at peak times in the Congestion Charge Zone.

**To what extent do you agree or disagree that a new Emissions Surcharge should be introduced to discourage the use of older, more polluting vehicles in central London?**

The RAC understands the urgency behind this. However, we believe that 2017 gives vehicle owners insufficient time to adjust to the changes. Typically, such older vehicles are owned by those least able to afford either to replace their vehicle or pay the Surcharge and therefore such a measure is likely to penalise the most disadvantaged and least affluent members of our society. If such a measure were to be introduced, we should prefer to see a minimum of 2 years lead time to allow time to adapt.

**12.** It is suggested that the Emissions Surcharge would operate in the same zone and at the same times as the Congestion Charge (0700 – 1800, Monday to Friday). It would not operate outside these hours or on Saturdays, Sundays or public holidays.

**Do you agree or disagree that the Emissions Surcharge should operate between 0700 – 1800, Monday to Friday?**

Should the Mayor choose to proceed with this option, these times of operation would be the most sensible way of implementing it.

**13.** It is suggested the Emissions Surcharge would be based on 'Euro standards', which are also used for the ULEZ. These are European standards that define the limits for exhaust emissions for new vehicles sold in EU member states. Vehicle manufacturers may only sell new vehicles that comply with these standards from a certain date. The emission limits defined by the Euro standards or equivalent would apply.

It is suggested that the charge would affect only pre-Euro 4/IV vehicles (broadly speaking those vehicles first registered with the Driver and Vehicle Licensing Agency (DVLA) before January 2005). Cars, vans, minibuses, heavy goods vehicles, buses and coaches would need to meet the at least Euro 4/IV emission standard in order to comply. This standard would apply to

both petrol and diesel vehicles.

**Do you agree that vehicles that do not meet at least the Euro 4/IV emissions standard should be required to pay the Emissions Surcharge?**

We support the use of Euro emissions standards as the basis for defining those vehicles to which the surcharge would apply. However, Euro IV petrol vehicles emit significantly less Nitrogen Dioxide than Euro IV diesel vehicles. The RAC argues that the imposition of an emissions surcharge on all vehicles that do not meet the Euro 4 standard is not evidence-based and that if Euro 4 is the appropriate threshold for diesel vehicles, then this equates to Euro 3 for petrol vehicles. We believe that, should the Mayor wish to implement this, petrol vehicles that do not meet the Euro III standards would be a better alternative, alongside diesel vehicles that do not meet Euro IV standards.

- 14.** It is suggested that vehicles that do not meet the standard would be required to pay a daily charge of £10. The Emissions Surcharge would be in addition to the Congestion Charge which is currently £11.50 (and any Low Emission Zone charges, if applicable).

**Do you agree that the daily charge should be set at £10 to reduce the number of polluting vehicles travelling in central London?**

Ideally, those with the most polluting vehicles should pay the highest surcharge but practically, we accept that a flat charge of £10 is probably the best option because it is easiest for motorists to understand and easiest for TFL to administer.

- 15.** It is suggested that the majority of exemptions and discounts that apply to the Congestion Charge would also apply to the Emissions Surcharge. Residents would only pay 10% of the daily Emissions Surcharge (if they did not meet the standards) and Congestion Charge. However, it is also suggested that vehicles with 9 or more seats including buses and coaches would be required to pay the Emissions Surcharge as they contribute pollutants in the same way as other large vehicles such as HGVs.

**Do you think that residents should receive a 90% discount from the Emissions Surcharge?**

The RAC would be supportive of this proposal should this emissions surcharge be introduced.

- 16.** Do you agree or disagree that vehicles with nine or more seats such as buses and coaches should also pay the Emissions Surcharge?



The RAC has mixed views on this proposal. We would not want to discourage groups of people sharing transport and one Euro 3 9-seater vehicle would almost certainly emit less pollutants than nine Euro 4 vehicles with one occupant in each.

**17. Do you have any other comments on the measures mentioned in this survey?** If so, please write them in the box below. If not, please skip this question.

The RAC has no further comments.