

Sadiq Khan
Mayor of London
City Hall
The Queen's Walk
London
SE1 2AA



c/o Institution of Environmental
Sciences
140 London Wall
London
EC2Y 5DN

29 July 2016

Dear Mr Khan,

Proposals for Cleaner Air in London

The Institute of Air Quality Management represents over 300 professionals working in the field of air quality in the United Kingdom and, as such, has an active interest in policies and legislation that influence air quality. We note your proposals for further measures aimed at improving London's air quality and wish to comment as follows.

Our overall view is that the proposals are a most welcome improvement on current measures and we are very much in support of the proposals. We are pleased to see that the capital city is seeking to implement measures that will place it at the forefront of air quality management and we hope that this will be a spur to other cities to implement bolder measures.

At the national level, the IAQM has argued previously for greater ambition, given the scale of the problem and the need to achieve compliance with NO₂ limit value in the shortest possible time. In our submissions to Defra and the EFRA Select Committee in 2015, we suggested that a scrappage scheme for diesel cars was worthy of consideration as a means of removing some of the most polluting vehicles from the fleet. We are therefore very pleased to see that the Mayor will be examining the feasibility of this.

All of the analysis undertaken to date shows that the problem of high NO₂ concentrations in London is mostly attributable to road transport and to vehicles with diesel engines in particular. The investments made previously in cleaner buses have been very worthwhile and the proposal to use the least polluting buses on routes where they have the greatest benefit is very sensible.

The ULEZ also targets the more polluting vehicles and the proposals to extend its geographical area and accelerate its introduction will have benefits for air quality. We are also mindful, however, that these proposals will not be universally welcome and there are costs as well as benefits. The IAQM believes that the benefits are likely to outweigh costs to society as a whole and, for this reason, the proposals should be welcomed.

The Emissions Surcharge is an interesting idea and follows the principle of asking the greatest polluters to pay, albeit in a very broad sense. We are slightly concerned that this proposal is not more targeted at diesel vehicles, however. Many pre-Euro 4 petrol cars are not especially high emitters of NO_x and we are not sure of the merit of treating this part of the fleet as equally polluting to the diesel equivalents. We would like to understand the reasoning for this equitable treatment of petrol and diesel engine vehicles.

Notwithstanding this point of clarification, the IAQM wishes to commend the Mayor on taking a pro-active stance on improving air quality in London and we support these proposals.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R Barrowcliffe', with a stylized flourish at the end.

Roger Barrowcliffe
Vice-Chair