



Environment Policy and Scrutiny Committee

Date:	2nd March 2015
Classification:	For General Release
Title:	Update on Air Quality Issues and Mid-Way Progress Report on the delivery of Westminster's Air Quality Action Plan.
Report of:	Director of Policy, Performance and Communications
Cabinet Member Portfolio	Sustainability and Parking
Wards Involved:	All
Policy Context:	Air Quality Action Plan; Better City, Better Lives; Westminster City Plan: Strategic Policies; Mayor's Transport Strategy; London Plan and Air Quality Strategy
Financial Summary:	There are no financial implications as a result of this report.
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1 EXECUTIVE SUMMARY

- 1.1 Continuing population and economic growth in London means there is a need to reduce pollution to provide a safe and healthy place for people to live and work. Developing a fit-for-purpose Air Quality Action Plan for Westminster was an aim of the Council's *Better City, Better Lives* strategy in 2012.
- 1.2 Poor air quality affects everyone and improving it can be significant for both health and wellbeing. In addition to measures to reduce emissions from the key sources, individuals can take action to reduce their exposure to high levels of pollution at a personal level. Westminster's Air Quality Action Plan was adopted in 2013 and has many cross-cutting themes with the recently adopted Cycling Strategy and the newly emerging Walking Strategy (see concurrent report on this agenda). Sustainable transport modes being beneficial in terms of both emissions reduction and by enabling the choice of travel routes away from main roads where air is cleaner and exposure to pollution can be minimised.

- 1.3 Delivery of air quality improvements in Westminster will require action from all levels of Government as well as private businesses and other stakeholders. The Council is well positioned to deliver action in partnerships and measures to improve air quality in the West End - where we have some of the worst air quality and highest levels of exposure in Europe – is currently being incorporated in the West End Partnership’s Delivery Programme.
- 1.4 We are now almost mid-way through the delivery of Westminster’s Air Quality Action Plan 2013-2018 and this report summarises the key actions and progress, highlights the key issues to arise since the Plan’s adoption in 2013, seeks the views of the Policy and Scrutiny Committee and provides the opportunity to make suggestions on issues and topics for review during the development of the next Air Quality Action Plan.

2 RECOMMENDATION

- 2.1 This report seeks the views of the Policy and Scrutiny Committee and provides the opportunity to make suggestions on issues and topics for review during the development of the next Air Quality Action Plan, due in 2018.

3 BACKGROUND

- 3.1 In common with many other dense urban areas Westminster suffers from poor air quality. This is largely a result of the millions of vehicles that travel through the City and also domestic and commercial heating and energy production. Pollution increases demands on health and social care services and can increase risk of early death, lung cancer, asthma, bronchitis symptoms, CVD, stroke, respiratory disease. Health effects are worse in children, older people and those with heart and lung conditions.
- 3.2 The Council’s air quality function cuts across several internal service areas and external organisations including Transport for London, the Business Improvement Districts and sub-regional partnerships such as Cross River Partnership (CRP). Together we manage and deliver improvements to local air quality through planning and environmental health, transport measures and interventions, construction management and delivery of the Air Quality Action Plan.
- 3.3 Emissions from buildings are set nationally through Building Regulations, and transport issues such as buses, taxis, and major road management is delivered through Transport for London and the Mayor. Westminster needs to work with these parties, to reduce the high levels of emissions in the city. This is particularly so as the Mayor of London manages the strategic road network in London and manages the licensing of buses and taxis, the most significant transport polluters. The powers to achieve the most significant improvement to London’s air quality, therefore, lie with the Mayor. Local authorities do, however, have a statutory responsibility to assess and improve, where necessary, their local air quality using the range or powers available to them.

Westminster Air Quality Action Plan (AQAP)

- 3.4 The Council has been working to improve local air quality for over fifteen years. Westminster was the first local authority in the UK to declare an ‘Air Quality Management Area’ in 1999

and was the first to adopt an Air Quality Action Plan (AQAP) in 2001. In 2013 the current version of our Air Quality Action Plan was adopted, and it continues to provide a robust and focused set of local measures and uses statutory planning and transport policies to ensure air quality improvements are delivered. Our 2013 AQAP is one of the underpinning strategies of the Joint Health and Wellbeing Strategy. A summary of key air quality actions undertaken as part of the Council's statutory air quality function is given in Appendix 1 with a summary of related plans in Appendix 2.

- 3.5 The development of the AQAP benefited from public consultation and review by the then Built Environment, Enterprise & Volunteering Policy and Scrutiny Committee at meetings in September and December 2011. Nine key issues were raised that required consideration and reflection: (i) a possible Inner London Low Emission Zone (now known as the Ultra Low Emission Zone - ULEZ), (ii) engine idling, (iii) traffic smoothing measures, road crossings and pollution exposure, (iv) electric vehicles, (v) managing the impacts of major developments and construction, (vi) urban greening, (vii) emissions from buses, (viii) emissions from taxis and (ix) emissions from trains. The AQAP was further developed in light of comments received from that Committee.

Current Air Quality trends in Westminster

- 3.6 Current monitoring data shows a decrease in particulate matter (PM₁₀) levels. While Westminster now achieves the EU annual target there are occasional breaches in the daily standard. This continued downward trend, which is likely to be largely due to improving vehicle engine standards, is very encouraging. However, for nitrogen dioxide (NO₂) the picture is worse. Although levels initially declined this trend did not continue and in some places began to rise. Both short and long term objectives for NO₂ were exceeded across Westminster. The Oxford Street site monitors levels three times the annual objective and had the worst pollution levels measured in London in 2013.

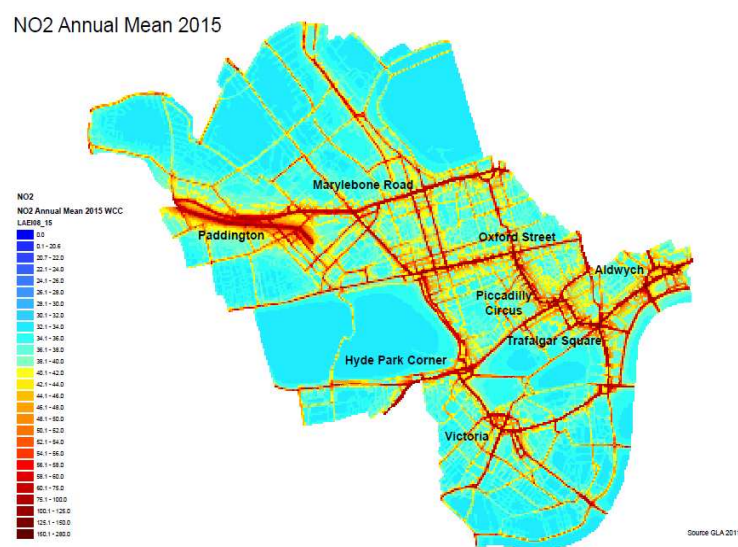


Figure 1 Map showing annual mean concentrations for Nitrogen Dioxide (yellow – red exceeds the EU standard)

Health impact estimates

- 3.7 A report published by Public Health England (PHE) in April 2014 estimated the number of deaths in UK local authorities that may be attributed to long term exposure to air pollution. A number of newspapers have reported the figures, also highlighting that people living in central London are three times more likely to die early due to air pollution than in 'greener' areas of the UK. It is estimated that 8.3% of deaths (equivalent of 88) in Westminster in 2010 are attributable to air pollution – this figure is the highest in London (and shared in percentage terms with RB Kensington & Chelsea). A table of figures is below:

Area	Attributable Fraction (PHOF Indicator)	Number of attributable Deaths	Associated years of life lost
England	5.6%	25,002	264,749
London	7.2%	3389	41,404
WCC	8.3%	88	1,403
RBKC	8.3%	68	1,164
LBHF	7.9%	72	1,070

- 3.8 The estimates are made for long term exposure to particulate air pollution (specifically fine particles of a diameter less than 2.5 microns) rather than short term exposure to high pollution episodes like the one as experienced when London suffered a significant smog episode in early April 2014.

Legal Proceedings

- 3.9 In early 2014 the EU started legal proceedings against the UK, for its failure to cut levels of nitrogen dioxide in parts of London. This could lead to fines of £300m annually. The Government is responsible for complying with EU pollution targets, although local authorities are legally required to work towards achieving national targets. Under the Localism Act, the Government is likely to require responsible London authorities to pay all or part of the fine.

4 KEY MAYORAL ACTION – ULTRA LOW EMISSION ZONE (ULEZ)

- 4.1 The Mayor of London manages the strategic road network in London and manages the licensing of buses and taxis, the most significant transport polluters. The powers to achieve the most significant improvement to London's air quality, therefore, lie with the Mayor and his agencies.
- 4.2 The Mayor has his own Air Quality Strategy, primarily concerning managing transport in London including the Congestion Charging and Low Emission Zones. The Ultra Low Emission Zone (ULEZ) is a new scheme proposed by the Mayor to reduce levels of harmful pollutants in central London. The Mayor recently consulted on the proposals for the ULEZ and Westminster's response is included in Appendix 3. The ULEZ will be beneficial for local air quality and public health but will have an economic impact for owners of vehicles required to comply with the new emission standards. It is anticipated that a final scheme will be announced later this year. It is proposed that the scheme:
- Operate from 7th September 2020 with a 'sunset' exemption period for residents until September 2023.

- Operate 24/7 in the same geographical zone as the current Congestion Charging Zone (CCZ).
- Bring in tighter standards for vehicles currently included in the London-wide Low Emission Zone (LEZ), i.e. buses and coaches, heavy goods vehicle (HGVs) and large goods vehicles (LGVs), and require emission standards for private cars.
- Require a charge to be paid for vehicles entering the zones that do not meet the required emission standard.
- Taxis and TfL managed buses will be exempt from the requirements of the ULEZ, but additional emissions and licensing requirements will be in place to complement the ULEZ.

4.3 Key issues/concerns raised during the consultation exercise include:

- Concern that the proposals of the ULEZ standard will fail to achieve predicted emission savings while still having large economic and social costs.
- Limited confidence in ULEZ, in its proposed form, to provide a reliable plan for reducing emissions from road transport – a better approach may be a move to a non-diesel vehicle fleet for London.
- No formal evaluation of the ULEZ proposed - limited ability for businesses to plan and no formal link to ULEZ achieving air quality aims.
- Potential for economic ‘hit’ to Westminster residents.
- Significant public realm implications from predicted move to electric taxi and bus fleets.

5 WESTMINSTER AIR QUALITY ACTION PLAN (AQAP)

5.1 The AQAP focuses action around the following three objectives:

- **Tackling Emissions from Transport:** Support initiatives to reduce transport emissions; Target pollution hotspots and routes (through emissions reduction or exposure reduction measures); Promote the use of low emission forms of transport; Promote the use of low emission deliveries; Encourage changes in driver behaviour; Reduce emissions from the Westminster fleet; Reduce exhaust emissions from road transport; and Support low emission rail transport.
- **Tackling Emissions from Buildings and Development:** Minimise emissions from developments; Reduce emissions from combustion; Control of emissions from biofuels; Reduce transport emissions from development; and Reduce emissions from construction sites.
- **Increasing Awareness of Air Pollution:** Provision of key air quality information.

6 KEY LOCAL AIR QUALITY ISSUES

6.1 West End / Oxford Street waste and freight vehicle reduction

Reduction of pollution in Oxford Street is critical due to its status as a global shopping and tourist destination, the very high footfall, and associated high levels of public exposure. Delivering action in partnerships with stakeholders will be the key to success in improve air quality in the West End. We are working to incorporate air quality actions into the West End Partnership’s Delivery Programme and are working with NWECA and other stakeholders to develop a programme to concentrate efforts to reduce vehicle numbers and emissions from

a key vehicle group which travels in the West End area - the freight, servicing and delivery vehicles which service the businesses. This work will build on the current successes in servicing and delivery /freight consolidation work of the Crown Estate, in Regent Street and Bond Street and, in addition, provide the opportunity to engage with the recently formed Mayfair Neighbourhood Forum and the evolving Marylebone Neighbourhood Forum

6.2 Health and Wellbeing

Poor air quality affects everyone and improving it can be significant for both health and wellbeing. In addition to reducing emissions from key sources individuals can take action to reduce their exposure to high levels of pollution at a personal level. The AQAP has many cross-cutting themes with the recently adopted Cycling Strategy and the emerging draft Walking Strategy as sustainable transport modes are beneficial in terms of both emissions reduction and by enabling choice of travel routes away from main roads where air is cleaner and exposure to pollution can be minimised. In addition, we are developing a project across the Tri-Borough area to communicate with people who are more at risk from the adverse health effects of pollution – those with cardio-vascular conditions -about the impacts of air quality on their health and what they can do and the tools available to help them minimise their exposure when air pollution is very high.

6.3 Vehicle Idling

During the development of the Westminster's AQAP consultation responses highlighted that pollution and nuisance from idling vehicles were of concern to the public. As a result, the AQAP made a commitment to review the options, resource and emissions implications of utilising 'no idling' legislation to help improve local air quality. With the change to a more customer-focused parking service, with traffic marshals working with drivers to increase parking compliance, the marshals can now extend their working practices to include idling vehicles. The Westminster Traffic marshals have very recently been authorised to enforce the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 and will work with drivers highlighting where they are in potential contravention of the regulations and requesting drivers to turn off their engines. If the request is ignored marshals will issue a fixed penalty notice of £20 as specified by the regulations. It is intended that this work be supported by a communications campaign to inform drivers of the new focus on reducing idling.

6.4 Code of Construction Practice

The Council has operated a Code of Construction Practice (CoCP) for over 20 years for the very largest construction sites with the most significant impacts in Westminster. The legal agreement which is negotiated with developers covers the cost of officers from the Council's existing Environmental Inspectorate team and Highways inspecting the sites which are subject to the Code. Typically around 10 sites a year have been covered to date, and these have been only the very largest sites in Westminster, with adherence to the Code negotiated on a case by case basis. The Code has been under review for some time, and a draft revised Code has been circulated with detailed follow up discussions with service departments taking place in the latter part of 2014.

6.5 The intention is to extend the existing scheme – which is currently only applies to certain large, strategic schemes to a much wider number of schemes, bringing full coverage – and moving towards a self-funding model – for all major applications, as well as many basement applications where these are causing disruption to others. Research has been undertaken on

the possible revenue cost savings that could result from this. Work is also ongoing around the policy basis and seeking advice from Counsel regarding enforceability of the scheme on smaller developments.

6.6 **Electric Vehicles and Car Clubs**

The electric vehicle recharging network was developed to address concerns about air quality and noise from road transport. The City Council pioneered public electric vehicle re-charging in the UK and now has the largest number of re-charging points in London. We currently have 57 re-charging points on-street and over 200 in private car parks across the City. This is the highest number by any authority in the UK. Westminster offers a range of incentives to electric vehicles (including electric motorbikes) including: free parking in Westminster (conditions: for solely electric powered and plug-in hybrid vehicles; in paid-for and electric vehicle recharging bays only; for the maximum prescribed period on the parking bay); no congestion charge; access to the largest on-street recharging service for electric vehicles in the UK; access to the largest off street recharging bay; and free parking permits for residents with low emission or electric vehicles. We are also working in partnership with our local Car Club provider (Zip Car) to support the upgrade of the car club fleet to electric vehicles by providing charging infrastructure.

7 **NEXT STEPS**

<p>Within the next 3 years Westminster City Council will</p>	<ul style="list-style-type: none"> - Continue to manage the delivery of the actions adopted in the 2013 AQAP - Raise awareness among more vulnerable groups about poor air quality; - Work with the local NHS to embed measures to reduce the risk of air pollution for at-risk patients; - Where appropriate, strengthen links between interventions to improve air quality to improve health and well-being - Work with the business community to help deliver air quality improvements through their operational practices. - Work with TfL and property owners in Oxford Street to reduce vehicle numbers and emissions from vehicles which service the area. Benefiting the health of the 220 million pedestrians that visit Oxford Street per year.
<p>Within the next 3 – 6 years Westminster City Council will</p>	<ul style="list-style-type: none"> - Complete the delivery of our 2013 AQAP and revise and adopt a new AQAP. - Work with Transport for London to deliver an Ultra Low Emission Zone; - Lobby government to up-date legislation to deal with pollution issues; - Ensure that that the issue of air quality is addressed through actions within the Westminster Health and Wellbeing strategy; - Lobby the Government to manage the impacts of wood burning stoves.
<p>Beyond the next 6 years Westminster City Council will</p>	<ul style="list-style-type: none"> - Continue to monitor air quality across the City through our monitoring stations; - Ensure that we work to address emissions from diesel engines.

8. **FINANCIAL IMPLICATIONS**

8.1 There are no financial implications as a result of this report.

9. **LEGAL IMPLICATIONS**

- 9.1 An Air Quality Action Plan is required under the system of Local Air Quality Management established by the Environment Act 1995 and following the declaration of the entire City pursuant to Section 83 of that Act as an Air Quality Management Area in 1999. S.84 requires the City Council, following the designation of the Air Quality Management Area, to prepare an 'action plan', including a statement of the times within which it proposes to implement each of the proposed measures comprised in the plan.
- 9.2 Local authorities are also required to consult on the preparation of action plans (and subsequent revisions of those plans) in keeping with published statutory guidance. Public Consultation on the Draft Air Quality Action was undertaken for period of 8 weeks during summer 2011, following an earlier review by the then Built Environment, Enterprise & Volunteering Policy and Scrutiny Committee at meetings in September and December 2011.

- **Appendix 1** **Key recent air quality actions**
- **Appendix 2** **Related Plans/Strategies**
- **Appendix 3** **Westminster's Response to ULEZ consultation**

If you have any queries about this Report or wish to inspect any of the Background Papers please contact: Jennie Preen – Project Manager (jpreen@westminster.gov.uk ext 1883)

BACKGROUND PAPERS

1 Westminster's Air Quality Action Plan (2013-2018)

Appendix One: Key recent air quality actions

- **School Green Infrastructure:** We have worked closely with schools to facilitate the development of sustainable travel plans to help improve air quality and congestion at the school gates and to increase understanding and knowledge of air quality and its impact on health. Additionally, we have installed a Green Wall at St Vincent de Paul School in Victoria and will be looking to install another green wall in St Marylebone School, in Marylebone.
- **Coach Parking:** Emissions for coaches parked within the City have been seen as a key source of exhaust emissions, capable of causing pollution, and noise nuisance. The Council has updated a large number of 'no idling engine' signs in coach parking bay on the borough's major roads.
- **Air Quality Monitoring:** A new monitor has recently been added to Westminster's air quality monitoring network. The monitor is sited at Victoria Palace Theatre and will measure the concentration of pollution from the busy road junction.
- **Westminster's Energy Future:** Westminster has some of the highest carbon emissions in the UK and the Council commissioned the 'Westminster Energy Master Plan' to help deliver the City's power needs for the future. We hope to launch the plan in 2014.
- **Community Power:** The Council aims to deliver energy efficiency projects in community buildings. We will use the Mayor of London's RE:FIT Programme and assess the Abbey Community Centre and the Westminster Achieve Centre.
- **Soho Retrofit Best Practice:** The Council, in partnership, has developed a best practice guide showing the cost benefits of retrofitting energy efficiency measures into the heritage buildings of the City. Launched in 2013, this guide has already been highlighted by the Greater London Authority as a tool to help property owners improve the performance of their buildings in a sensible and cost effective manner, highlighting restrictions that may need to be addressed and setting out clear payback periods for technologies and measures.

Appendix Two: Related Plans/Strategies

- **Westminster's City Plan** - Westminster's planning policies play a central role in mitigating the air quality impacts of development to ensure that the effects of poor air quality are minimised. City Plan policy requires any new development and construction to minimise polluting emissions.
- **Better City Better Lives** – The development of Westminster Air Quality Action Plan was an objective of Better City, Better Lives 1.
- **Greener Westminster Action Plan (2015-2025)** – This is designed to prioritise the environmental policy and project work that Westminster City Council will focus on over the next ten years. It will be reported on annually, reviewed by this Policy & Scrutiny Committee and lead to the delivery of Westminster's environmental vision – creating an environment in Westminster that befits our world class city status. The Action Plan is formed around nine key objectives including improving local air quality.
- **Cycling / Walking Strategies** - The Cycling Strategy has ambitious aims and the overall vision is to make it safer and easier for more people to cycle in Westminster, and thereby increase the proportion who choose to do so. Currently, approximately 3% of all trips originating in Westminster are made by bike, but the City Council aims to increase this percentage to at least 7% by 2025/26 exceeding the Mayor's target of 5% for Westminster. The Cycling Strategy was adopted in November 2014. A scoping report on a Walking Strategy for Westminster is on the agenda of this Committee.
- **Local Implementation Plan (LIP)** - Air quality is integrated with transport measures as this is one of the LIP's key objectives.
- **Public Health Strategy/Health and Wellbeing Strategy** - Air quality action has traditionally focused on reducing emissions from transport and built environment sources; however, the transfer of public health responsibilities in April 2013 provided opportunities to work together and further develop measures to reduce the effects on health from poor air quality. Westminster's Joint Health and Wellbeing Strategy notes that the borough '*falls within the worst 20% of areas nationally for outdoor living environment ... and parts of the city are among the worst performers in air quality tests in Europe*'. The Strategy lists a number of relevant underpinning strategies and plans including the Air Quality Action Plan, the Open Space Strategy and the Sustainable Models of Travel Strategy.
- **Environmental Health, construction and nuisance enforcement work** - Ensuring dust emissions from construction and demolition activities are minimised and that nuisance from smoke and chimneys investigated and mitigated has benefits for local air quality.

Appendix Three: Westminster City Council's

Response to Ultra Low Emission Zone (ULEZ) consultation January 2015

In response to TfL's consultation on the proposed Ultra Low Emission Zone (ULEZ) Westminster City Council has the following general comments:

1 Proposal does not go far enough

- 1.1 Westminster Council is very concerned that the ULEZ proposals fall far short of the necessary levels to achieve to an adequate quality of air in central London. London's population health and its status as a global city and leading economic and commercial centre are all threatened by the levels of pollution.
- 1.2 The UK is potentially facing £300mil annual fines for non-compliance with air quality standards, with London predicted to achieve compliance as late as 2030. A significant portion of pollution in Westminster results from 'background' pollution not generated locally but from the larger London region. Individual local authorities are very limited in the powers and action they can take to affect regional levels.
- 1.3 The Mayor manages the strategic road network in London and manages the licensing of buses and taxis; the most significant transport polluters. The powers to achieve the required air quality improvement in London, therefore, lie with the Mayor. Local authorities, including Westminster City Council, cannot be held responsible for failing to achieve air quality standards and we expect the Mayor to have a greater level of ambition to improve London's air quality immediately. We would also expect the Mayor to introduce city-wide measures to reduce pollution to compliant levels. Specifically, the Council requests that the Mayor revise his plans in order to achieve the air quality health standards across London as soon as possible.

2 London needs stronger standards over a wider area

- 2.1 More action needs to be taken across a wider area because:
 - Air pollution is a regional issue and focussing action in the proposed small, central ULEZ area will not achieve the air quality health objectives for either central London or the wider region; and
 - Whilst a large area of Westminster and a number of Westminster's air pollution 'hotspots', most significantly Oxford Street, fall within the currently proposed ULEZ boundary, we have concerns that areas outside of the proposed zone where air quality is also poor, such as Marylebone Road, may not benefit sufficiently from the ULEZ standards.
- 2.2 The proposed ULEZ is the central zone of the wider, pan-London Low Emission Zone (LEZ). A combination of introducing an ULEZ and tightening the current standards of the LEZ could be the way to both improve air quality in the central zone as well as extending the air quality benefit to the wider London area. We are supportive of using the existing infrastructure of the LEZ and Congestion Charging Zone (CCZ) to enforce air quality emission standards. This could involve tightening the current standards of the London-wide LEZ (for example, to require Euro VI for HGVs, Buses and coaches, LGVs and include

London-wide standards for taxis and London buses similar to those proposed for the central area) and, if necessary, further strengthening the proposal for the ULEZ (for example, to exclude diesel vehicles - see section 3.2). The Mayor should propose a revised scheme using the framework of the operational LEZ, together with the proposed ULEZ, to achieve the air quality objectives in London.

3 Concerns with Euro-standards approach

- 3.1 There is a high level of concern that the proposals of the ULEZ rely too heavily on the 'euro-standards' delivering their predicted emissions savings. As has been seen with past euro-standards, real-world emissions have, so far, failed to achieve the predicted emissions levels. Initial evidence shows the same to be true for Euro 6/VI. If this turns out to be the case, the proposed ULEZ will fail to achieve its predicted emissions savings, while having large economic costs.
- 3.2 Diesel fuelled vehicles are the most significant source of NO_x pollution and an alternative approach to the proposed ULEZ may be to develop plans and work with the Government to support a move to a non-diesel vehicle fleet for central London. The Council would encourage the Mayor to develop options and assess the feasibility of moving to non-diesel based transport in central London.

4 Scheme evaluation and management

- 4.1 Given the economic impacts of the proposed scheme, the fact that the proposed ULEZ does not seek to achieve the national air quality standards for health and is based on unproved euro emission standards, we would expect the Mayor to produce a planned, timetabled framework to formally review the impacts of the ULEZ scheme and a plan for changing/strengthening the standards of the ULEZ (and /or LEZ) to achieve air quality health standards.
- 4.2 Some inner-London councils are lobbying to extend the zone beyond the CCZ to the north/south circular boundary. We would expect a commitment from the Mayor to include an assessment of the zone boundary as part of the overall review of the ULEZ and effectiveness of Euro VI technology. Additionally, we would expect that any consideration of a zone extension be subject to full consultation.

5 Economic impact on businesses

- 5.1 Given the challenging economic impacts of the proposed scheme on local businesses, we would be supportive of a Government funding scheme to assist businesses affected by the ULEZ with the cost of transition to the new vehicle standards. We expect the Mayor to ask the Government to fund such a scheme.

6 Residents' exemption

- 6.1 The Council is supportive of the proposed three year 'sunset' exemption period for residents inside the ULEZ. The exemption period means all resident-owned diesel vehicles will need to be no older than 7/8 years and petrol vehicles no older than 17 years: which gives an appropriate level of vehicle choice for residents. That said, residents' vehicles in the ULEZ are likely to make up only a small percentage of overall traffic. The inclusion of them in the ULEZ standards should only be considered in 2023 once the overall

success/impact of the functioning ULEZ and the effectiveness of Euro VI technology have been established via a thorough evaluation.

7 Electric charging infrastructure

7.1 The ULEZ proposals requires zero emission capable new taxis by 2018 and aims for all single decker and double decker buses to be fully electric and hybrid electric, respectively, by 2020. The proposals do not, however, give any detail on the infrastructure requirements to deliver these objectives. For example, there is likely to be a substantial impact on the public realm from the installation of a London wide electric rapid charging network to support the taxi fleet. This will be in terms of design, parking spaces and access to the kerbside and electricity grid impacts. Westminster's location makes it crucial in delivering electric charging infrastructure and we are concerned about the lack of detail on the infrastructure requirements and their potential impacts on the central London's public realm. We urge the Mayor to engage with the City Council and our neighbouring boroughs on this issue.

8 Alternative fuels

8.1 We would also urge the Mayor to give more consideration to the support of alternative fuels, especially for freight and servicing vehicles (e.g. HGVs and LGVs). The ULEZ proposal focuses on euro standards and electric vehicles with little additional support for vehicles with alternative fuels, such as CNG or LPG. Alternative fuels could help with the move away from a predominantly diesel fleet and are lower in emissions. The Mayor should do more to promote the use of these vehicle types.

9 Taxis

9.1 Westminster's Air Quality Action Plan (AQAP) commits to supporting the Mayor in his aims to bring about improvements to the taxi and private hire vehicle (PHV) fleet, but urges him to further reduce emissions and to find ways to facilitate and promote the use of low emission fuels and technologies.

9.2 The Council welcomes the proposals for all new taxis from 2018 to be zero emission capable and the reduction of the taxi age limit from 15 to 10 years. We are pleased to see that these requirements will apply beyond the boundary of the ULEZ, but compared to the standards for other vehicles - such as private diesel cars needing to be Euro 6 - the taxi standards are out of step and, arguably, inadequate.

9.3 The taxi fleet is the second biggest source of NOx pollution in central London. We would like to see a much greater level of ambition for reducing emissions from taxis, bringing the proposed taxi standards of the ULEZ in line with those for other vehicle types. We support the proposal to introduce funding to support taxi owners to upgrade the fleet. The legacy of a limited scope to change vehicles, due to licensing requirements and vehicle makes, means that it is economically challenging for taxi owners to upgrade to less emitting vehicles in the necessary time frame. Funding needs to be made available to action the change by way, for example, of the proposed 'scrappage' scheme. We support the Mayor in asking the Government to fund such a scheme and ask that the scheme be sufficiently funded to bring about a high level of fleet upgrade in order to significantly reduce emissions.

9.4 Westminster Council has led the way in providing electric vehicle charging infrastructure in

the City and we welcome working with the Mayor to further his electric taxi aims. As discussed above, there is likely to be a substantial impact on the public realm of a central-London wide electric rapid charging network. We urge the Mayor to engage with us fully on this issue and to fully engage with local authorities to investigate other ways we can support the uptake of cleaner taxis, e.g. through priority 'green' taxi access and/or ranks in air quality 'hotspot' areas.

10 Buses

- 10.1 We acknowledge that action has been taken to reduce emissions from buses across London and welcome the proposals of the ULEZ, which aspire to all buses in the central area being either hybrid or zero emission by 2020; but more needs to be done and ,with the ULEZ over five years away, more needs to be done now.
- 10.2 Buses are still the most significant source of NO_x pollution in central London and the Mayor should lead by example by requiring buses to exceed the proposed standards of the ULEZ. The majority of buses travelling in the central zone also travel outside of that zone and, therefore, cleaning up 'central' buses will have some air quality benefit outside the central area. Poor air quality is a London-wide issue and cleaning up all of London's buses to the same standards of the central zone buses at the earliest opportunity should be a key aim of the Mayor.
- 10.3 On many strategic roads in Westminster traffic is dominated by buses. And this is particularly true of Oxford Street where NO₂ annual mean levels are more than three times that of EU standards, and hourly exceedences more than 80 times the standard. Reduction of pollution in Oxford Street is critical due to its status as a global shopping and tourist destination, with over 220m people visiting per annum.
- 10.4 Although Oxford Street has seen a 20% reduction in bus numbers and the opening of Crossrail in 2018 is likely to help further reduce bus numbers in the area more buses on Oxford Street need to be removed, replaced or retrofitted to reduce polluting emissions. A significant percentage of the buses which travel along Oxford Street are currently Euro IV and V vehicles which are known to be worse for emitting NO₂ pollution than the older buses which have been fitted with abatement kit and newer buses with cleaner engine technology. This would make Oxford Street a good site for TfL to focus early bus intervention work to bring about an improvement in the local air quality right now. The Council would like to see TfL take targeted action on buses in Westminster and particularly in Oxford Street at the very earliest opportunity by:
 - reviewing routes to reduce bus numbers and bus stands where possible;
 - investing in and retrofitting of SCR (Selective Catalytic Reduction) abatement equipment to all Euro IV and V buses;
 - focusing the use of Euro VI, hybrid buses and electric buses in future on high pollution routes;
 - applying the exact same retrofitted SCR or Euro VI standard to all London Service Permit (LSP) licensed tour bus services that operate and stand in some of the highest exceedence areas of the capital;

- applying the same for LSP licensed express coach services that predominate across the congested Victoria area; and
- working with the Council to develop electric charging infrastructure.

11 Ring-fencing of funds

11.1 There is no mention in the consultation documentation of the intended use of the funds collected from the ULEZ charge. We request that:

- the funds collected from the ULEZ charges be ring-fenced for spending on transport and travel schemes, improved public realm and infrastructure in the ULEZ area; and
- revenue be returned to affected boroughs to allocate on improvement projects.