



Elizabeth Fonseca, Environmental Quality Manager,
RBKC
Via email to AQCCAP@rbkc.gov.uk

Department: Development,
Enterprise and Environment

Date: 8th September 2015

Dear Elizabeth,

Thank you for consulting us on your draft Air Quality and Climate Change Action Plan. Overall we felt that this is a comprehensive plan that we are very happy to support. We welcome the combination of the AQ and climate change action plans, this is the approach TfL took for the Transport Emissions Roadmap.

Please note that when the Action Plan is finalised the final version will need to be submitted to the GLA for formal approval.

Recommendations and comments:

1. It's great that the plan includes a foreword from the Cabinet Member for public health as well as environment. This is a best practice approach.
2. The introduction on health impacts is very strong and well worded.
3. It's very positive that the action section will be a living document – we support that approach, which is in line with the new London Local Air Quality Management proposals.
4. Action 9 on wood burning stoves is interesting; we would very much like to see any measurable outcomes from this project, please do keep us informed.
5. Action 27: it's excellent to see a specific action around dust and emissions and NRMM. As this is such a major source of emissions in London we are really relying on borough support and commitment to help enforce the NRMM LEZ.
6. Actions 32-33: we welcome RBKCs review of fleet and encourage their participation in TfL's forthcoming Low Emission Commercial Fleet programme, which will help to provide guidance to fleet operators.
7. Action 75: whilst we are open to an increase in the size of the ULEZ, we do not believe that aligning the scheme boundaries with administrative boundaries is a practical solution. TfL are discussing potential options for the future of the London-wide Low Emission Zone (LEZ) and the ULEZ with boroughs. We would welcome further engagement with RBKC on this. Any alteration to the proposed ULEZ would be subject to full feasibility testing and public consultation.
8. Action 81: taxis are subject to a 15 year age limit. As part of the ULEZ TfL will be operating a voluntary decommissioning scheme for taxis over the age of 10 years, which will include most Euro 3 Taxis. This scheme will be introduced when the zero emission capable taxis become commercially available (2018 at the latest). We consider that encouraging early removal of the Euro 3 vehicles from the fleet will be more effective in

reducing CO2 and air pollutants than retrofitting older vehicles and would also help stimulate the uptake of the new Zero Emission Capable taxis. A Euro 3 DPF retrofit scheme is likely to discourage drivers from decommissioning their vehicles, due to the initial investment in the retrofit. As such we would not recommend pursuing a Euro 3 diesel particulate filter retrofit policy.

9. Action 82: taxi drivers are required to undertake a Driving Standards Agency assessment which includes elements of eco-driving. TfL has promoted additional eco-driving training for taxi and PHV drivers through trials in 2011-12 and 2012-13.

Good luck with the consultation and I look forward to seeing the final plan.

Kind regards,



Poppy Lyle
Senior Policy and Project Officer (Air Quality)