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28 June 2018

The Right Hon. Michael Gove MP
Secretary of State for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
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Dear Secretary of State

The city of Oxford and air pollution

Air pollution cuts short an estimated 40,000 lives across the country every year. Around 276 deaths in Oxfordshire every year could be attributed to long-term exposure to air pollution, according to Public Health England estimates.

I have enclosed a copy of our latest Annual Status Report to draw your attention to the local data that we collect, but is not used by Defra to understand the problem to demonstrate improvements. Oxford City Council welcomed the opportunity to discuss some of the below matters with you at the Air Quality Summit at Mansion House on 20 June.

Toxic and illegal air is affecting the health of people right here in Oxford, from the womb to old age. Children born this year are likely to face another ten years of poor air quality under current plans. This could have a devastating effect on their health—it could stunt their lung growth and put them at a higher risk of developing further health problems in later life.

It doesn't have to be this way. I am writing to ask you to put the health of our communities first. We may all breathe the same dirty air, but younger and older people and those with pre-existing health conditions are disproportionately affected by air pollution. Oxford City Council is dedicated to eliminating health inequalities such as these. We want to have full ownership of local solutions to local problems. But, we need additional support to make even more progress.

Road vehicles contribute about 80% of nitrogen dioxide pollution at the roadside and diesel vehicles make up a big part of this. The city of Oxford wants a ten-point contract with Government which carries the necessary urgency to improve air quality and reduce emissions of hazardous pollutants. What follows is a road map for the future, in particular for putting cleaner vehicles on our roads and guaranteeing equity is at the heart of the electric vehicle revolution.

1. Raise the bar and end the sale of all new polluting vehicles earlier than 2040

The Government has committed to ending the sale of new conventional petrol and diesel cars and vans by 2040. We welcome the Government's commitment, but have concerns that this deadline is too distant to encourage earlier and more widespread adoption of zero- or low-emissions vehicles. Norway intends to reach this milestone by 2025 and India is considering a 2030 target — a whole decade earlier than the UK.



2. Install all the relevant infrastructure to accelerate the electric vehicle revolution and ensure that the energy powering electric vehicles doesn't pollute

Bringing forward the date for ending the sale of new polluting vehicles will encourage manufacturers to make a step-change and produce clean cars by an earlier date. However, the UK's electrical infrastructure must be large enough to power the growing number of electric vehicles on our roads. We are concerned about an emerging tipping point in the coming years when a sizeable proportion of residents will own electric vehicles, but there is a lack of charging infrastructure in the city.

That means the Department for Transport providing an adequate supply of charging infrastructure, particularly for rapid charging. But, even if there were charging points in all the right places, there must be an electrical infrastructure which sits behind those charging stations supplying energy.

We call on Government to have a focus on how our energy to power the cars is being generated. If there is a focus on Coal generated electricity, we are merely moving the pollution elsewhere.

3. Revise Vehicle Excise Duty for a faster and wider uptake of zero-emissions vehicles

We share the concerns expressed by a number of industrial bodies about amendments to Vehicle Excise Duty (VED) which removed CO2 emission banding. This move has significantly reduced tax incentives to purchase an electric vehicle, hampering the growth of a second-hand low-emission market which could be key to increasing clean vehicle uptake. This move is especially unhelpful when you consider that the current rate of renewal means it could be years before ultra-low emission vehicles replace all of the most polluting vehicle types.

We call on Government to encourage the widespread take-up of low emission vehicles by revising Vehicle Excise Duty rates to incentivise new purchases and support the second-hand market.

4. Increase a vehicle's maximum payload to encourage a faster and wider uptake of electric and other alternative fuel vehicles

In August 2017 the Government began a public consultation to extend the current gross vehicle weight (GVW) allowance on the standard driving licence from 3.5 tonnes to 4.25 tonnes for alternative fuel light commercial vehicles (LCVs) only. In December 2017 the O Licence (or Operator Licence) exemption was increased from 3.5 tonnes to 4.25 tonnes; however, the O Licence issue is separate to the driving licence issue, which is still to be resolved.

Changes to the GVW allowance is highly central to the uptake of larger EV vans. The availability of larger vans is important for facilitating a move to zero emissions modes for this transport type. At present, batteries weigh a lot which reduces the carrying capacity of an EV van to comply with payload limits. As the legal maximum gross vehicle weight (GVW) for a standard UK driving licence is 3.5 tonnes, the additional e-mobility weight has to come from the payload capacity. Reduced payload means the ability to carry fewer goods, which could result in a company needing to send two electric vans to carry what would legally fit into a single diesel.

In Oxford, our proposed zero emissions zone covers the world-famous Covered Market centred in the heart of the city. The market's specialist independent traders each sell their own unique variety of goods and need help receiving and sending deliveries in the new zero emission zone. Some of the traders currently use transit van sized vehicles (3.5T) but would benefit enormously from the introduction of larger EV vans, made possible by an extension of the current gross vehicle weight (GVW) allowance on the standard driving licence from 3.5 tonnes to 4.25 tonnes.

5. Implement a polluting vehicle scrappage scheme

On 22 November 2017, Government launched a consultation on a vehicle scrappage scheme as an option for removing polluting vehicles from the road. The current rate of renewal of the vehicle fleet means it will be years before ultra-low emission vehicles replace the most polluting vehicle types. A scrappage scheme could speed up this process considerably.

6. Put equity to those on low incomes at the heart of every approach

We want any scrappage scheme to include provisions to support low-income drivers and small businesses. We are calling on Government to increase vehicle excise duty on new diesel vehicles from April 2019, and then use the money raised to help fund a diesel scrappage scheme for those on low incomes. A scrappage scheme would see drivers financially compensated for scrapping their diesel vehicle and replacing it with a more environmentally-friendly version.

7. Tighten cleaner air standards in line with the latest scientific evidence

The scientific understanding of the health effects of everyday air pollution has changed dramatically in recent years. Public health effects of air pollution that were largely unknown in the 1990s and uncertain until recently are now quantifiable, and air pollution is associated with far greater public health risk than was understood even a decade ago.

Oxford is set to introduce the world's first Zero Emissions Zone because there is no such thing as a safe limit on toxic air pollutants – we want to bring pollution down to the absolute lowest possible level. We want the Government to deliver on its duty to urgently meet current legal limits of air pollution – ideally going beyond this to ensure the best outcome for people's health.

We would welcome working with you to understand whether current legislation adequately protects public health, in particular whether the legal limits of air pollution can be reduced to a lower level in line with a growing body of credible scientific research. We note that the World Health Organisation (WHO) is reconsidering its guideline limits on air pollution. If the WHO strengthens its targets and the consequence is current legislation does not adequately protect public health, we would want to work with you to adopt updated WHO targets into UK statute.

The Government has set a useful strategic direction for the country in ending the sale of polluting vehicles, but it would be useful for Westminster to set a similar direction of travel on air pollution limits, particularly post-Brexit. This would clearly set out to local authorities, businesses, residents, and transport operators where the country needs to be in the coming years to tackle air pollution, and provide future certainty, enabling everyone to work together towards a goal.

8. Take into account Oxford's local data for developing national air quality measures

We are concerned about the disparity of data collected locally and the data used to inform Defra's national plan. We have concerns that the Government's measures will be able to deliver air quality improvements in the shortest time possible when they are based on relatively coarse information that is often inconsistent with local authority data. Data can be used for good news as well as understanding where the problems lie and where to target action. We need Oxford's local authority data to be taken into account in national policy formulation. We have concerns about the over-optimistic modelling of our air quality problem when our air quality monitoring shows air pollution to be above legal limits in several streets in central Oxford.

9. Establish a watchdog to enforce air quality measures after leaving the European Union

We need tough action on air quality, defending people's right to breathe clean air. Government is under pressure from the High Court of Justice and the European Commission who are taking our country to court for consistently ignoring EU rules on air pollution. This could lead to hefty fines.

The European Commission and European Court of Justice have played a key role in holding the Government to account and enforcing the UK's legal obligations. As Secretary of State, you have identified a 'governance gap' will follow EU-exit and proposed creation of a body independent of Government, placed on a statutory footing, to champion and uphold environmental standards.

As the European Union (Withdrawal) Bill does not provide for post-Brexit governance arrangements for air quality, we call for the establishment of an appropriate agency written into legislation to independently enforce air quality requirements. Such an agency should have equivalent powers, standards, and enforcement mechanisms as equivalent enforcement agencies in the EU. The new watchdog must have teeth to compel Government to act, otherwise action will be weakened.

10. Launch a public health campaign to highlight the dangers of air pollution

We call for wider education of the public, in particular school-age children, about the health benefits of switching to electric vehicles and more active transport, to be run by Public Health England no later than November 2018. Addressing air quality near local schools is a priority for Oxford City Council—whose anti-idling air campaign is a first-of-its-kind partnership with Oxford Friends of the Earth—raises awareness of the toxic effects of car exhaust fumes on children. The campaign sees schoolchildren surveying idling engines at the school gate and learning about the health impacts of air pollution, while encouraging their parents to cut their engines while waiting for them, and we call on Government to supplement our educational efforts.

We are proposing a road map for the future, but to deliver it we need a ten-point contract with you and the Government. That involves concrete and practical Government support which could help Oxford, as well as other towns and cities, to make the much-needed step-changes. These alone could help Oxford and the rest of the UK to accelerate the electric revolution.

We would welcome the opportunity to discuss these proposals with you.

Yours sincerely



Councillor Tom Hayes
Board Member for Safer and Greener Oxford