## **Draft Response to the RAC Submission.**

- 1. It is true that diesel was promoted to help reduction in CO2, this has been mentioned in the various reports, considered and raised at Scrutiny and Leadership, it does not detract from the health priority and the need to address polluting vehicles.
- 2. As mentioned in the call-in response it is not possible to assess individual driving behaviours and we must rely on 'averaged' data.
  - There will be a 2 year study into the impact upon behaviour; this has been addressed in the Call-in response.
  - The levy by itself will not resolve the issue of Air Quality but must be seen as an important component in a wider agenda.
  - Extending the minimum period will not incentivise drivers but simply delay the inevitable push away from diesel cars.
- 3. Vehicles parked in the borough do contribute to its overall impact upon air quality. The freight industry, buses and taxis are being addressed by other AQ schemes and do not and will not contribute 'with impunity'
- 4. See point 2
- 5. Following the VW scandal the Department of Transport tested a selection of popular diesel vehicles in 'real world' conditions and these exceeded the standards for NO2 by x6, even for Euro 6 vehicles. Therefore there is no confidence in excluding Euro 5 & 6 from the scheme.
  - There are proposed new testing standards called Euro 6C which represent real driving conditions and where vehicles have been found to comply we can consider removing these from the charge.
- 6. Clean Air Zones are being considered, however the framework is not yet established, this will take some time to introduce and a levy can be seen as a preparation or precursor for what would be a more stringent control on emissions on vehicles passing through the borough.
  - The Council is focusing the levy on the most polluting vehicles, with buses and freight being captured by TFL & GLA via the proposed ULEZ.
  - A council wide ANPR scheme is currently being rolled out to deal with congestion in sensitive areas of the borough.
- 7. We understand the issues surrounding changing to electrical hence the reason we excluded petrol vehicles from the charge as a preferred alternative in the short term.

