25th September 2026

NRMM Stakeholders' Joint Call for Action: London NRMM Policy

Submission to the Mayor of London and the Greater London Authority (GLA)

Introduction

NRMM encompasses a wide range of construction equipment including excavators, cranes, piling rigs, compressors, generators, lighting towers and other mobile plant used on construction and infrastructure sites.

Since the introduction of the London-wide Non-Road Mobile Machinery (NRMM) Low Emission Zone, the policy has delivered meaningful improvements in air quality by accelerating the uptake of low-emission construction equipment across the capital. London is widely regarded as a leader in this space, and the supply chain has made substantial investments in low emission equipment that supports delivery of these GLA objectives.

However, the policy has now reached a point of diminishing returns and stagnation. The current policy direction is not expected to create meaningful emission reductions until at least 2040, a target which itself is crippled by uncertainty. As discussed in Section 5 of this position paper, the zero-tailpipe policy signal is premature, currently lacking the necessary infrastructure, cost controls, national and international frameworks to turn those technologies into a practical investment pathway at scale.

The next step in emission reductions from off-road machinery is fundamentally different from those that have come before. This time it is not just the engine that needs to change, but the fuel itself, requiring an entirely new delivery infrastructure to be put in place, which will be highly challenging, as well as requiring new skills to be learnt and new operating models to be implemented. The transition needs to be incremental to control cost increases and allow sites to familiarise themselves with entirely new ways of working.

Previous emission reductions were also supported by much larger markets than London alone. When the London EU Stage IV mandate was signalled in 2016, Stage IV was already the minimum standard for manufacturing across all of Europe. This 9 year lead time combined with readily available machines and only moderate operational implications, contributed greatly to the success of the policy.

Even if Zero Tailpipe manufacturing requirements were introduced at EU level, this would not resolve the economic and operational concerns of the sector. It is impossible to overstate the complexity of such a transition in the off-road market.

Fleet operators also need certainty that future technologies can be deployed across a broad range of users in London for certainty in compliance, and nationally and internationally for residual value.

This paper sets out a series of practical policy proposals intended to:

- Enable confidence and transparency in the governance of NRMM policy
- Improve real-world compliance and enforcement outcomes
- Reduce unnecessary administrative burden for industry and local authorities
- Create a more credible pathway towards significant and scalable emission reductions

The signatories of this paper represent over 2300 businesses covering the vast majority of the construction equipment supply chain - manufacturers, suppliers, powertrains and retrofit.

These recommendations should not be viewed as a list of options for the GLA to pick and choose from. Each recommendation has been carefully considered to complement the others and achieve an overall balance between complexity, cost, realism, scalability, enforceability and environmental outcomes. They should therefore be considered as a complete and interdependent package. Selective adoption could disrupt that balance and may mean that some signatories can no longer support the resulting policy position.

We ask that the GLA acknowledges and considers these proposals in detail, to ensure the London NRMM Low Emission Zone remains both aspirational and deliverable.

---

1. Re-establish Structured Cross-Industry NRMM Committee Meetings

What were once open, cross-industry forums have shifted towards isolated one-to-one discussions, without transparency, shared agendas or published minutes. This has reduced trust, prevented constructive challenge, and weakened the quality of policy development, which has led to slower reaction times and increased stakeholder concerns.

While we welcome the resumption of in-person engagement, these meetings no longer appear to provide a forum for substantive policy development. The NRMM policy itself commits the GLA to maintaining an open dialogue with industry experts, particularly in relation to exemptions and technological advancement. At present, we feel this commitment is not being realised in practice.

Meaningful engagement improves policy design, reduces unintended consequences, and strengthens industry buy-in. This is particularly critical given the increasing technical and economic complexity of future NRMM policy decisions.

NRMM Stakeholder Recommendations:

1.1 Re-establish formal cross-industry NRMM committee meetings. Those meeting should:

- Take place at least twice per year.
- Be held in person at GLA offices.
- Have a structured agenda, with recorded and circulated minutes and actions.
- Contain clear confirmation that, while policy stability is important, policy proposals are open to discussion and can translate into real policy changes where justified.

---

2. Increase NRMM Enforcement Efficiency

NRMM compliance is formally enforced through planning, but in reality the vast majority of compliance is driven by audits from NRMM Officers. During Construction Plant-hire Association (CPA) Special Interest Groups, hire companies complain that non-compliant machinery often survives its deployment without inspection. They also express frustration with customers that demand non-compliant items, forcing suppliers to bend to their will or lose the contract.

This is an extremely difficult position to be in during a sustained decline in available work, with project starts down 20% year-on-year in 2025, and a further 28% so far in 2026, according to Glenigan Construction Market Analysis. Turning away work can easily translate into business continuity challenges and job losses for any hirer who refuses to supply non-compliant equipment.

The principal contractor is liable for NRMM compliance, but suppliers and manufacturers have heavily invested in cleaner kit and need to see a return on that investment to continue doing so. Frequency of machine inspections and enforcement are now the primary limiting factor in improving compliance with current standards and justifying future fleet investments.

Current enforcement Key Performance Indicators (KPI)s focus on the number of site visits in each borough. This encourages better site coverage, capturing sites that may otherwise have been missed, however, there is a risk that it forces NRMM officers to prioritise sites that can be audited quickly with their limited resources.

In 2025, NRMM Officer KPIs for visit numbers doubled. London NRMM enforcement data, obtained through Freedom of Information request, shows that compared to 2024, total sites visited increased by 68% but the total number of machines inspected fell slightly. Also, in 2025 half of all sites visited had no machinery to inspect, versus a quarter of sites the previous year.

This consist of:

- 16% - active construction site but no in-scope machines
- 14% - not a construction site (e.g. event / industrial site)
- 10% - no apparent works (e.g. works are delayed / have not commenced)
- 9% - Was once a construction site but works now complete

While some of these visits can raise awareness of the NRMM zone, on balance we feel that these are an inefficient use of officer time. While the occasional visit to a site with no machinery is inevitable, 50% is incredibly high, suggesting that increasing KPIs coupled with minimal increases in enforcement resourcing is forcing officers to prioritise visit numbers over machine inspections. Visits to sites without machinery should be disincentivised within the KPI framework, with equitable adjustments in expected visit numbers.

Traditional planning enforcement is slow, it can take months, by which time a machine has already completed its work and left site and all notices are deemed complied-with. Thankfully, Merton's audit process has driven compliance in the vast majority of cases. However, they still apply a 5 working day window for sites to rectify issues found on inspection. While this flexibility is fair in the first instance, continuing to apply this flexibility to every subsequent visit has allowed short-term and site-to-site machinery to slip through the net. Escalatory consequences are needed to tackle repeat offenders.

The current machine registration system is punishingly burdensome for both sites and enforcement officers. Machine registration requirements make compliance and enforcement unnecessarily onerous and prone to IT problems, demanding flexibility from NRMM officers. It does not return valuable data for the GLA except that which is already captured by NRMM officers, and it is rarely completed correctly outside of an audit.

London NRMM enforcement data shows that in 2025, 45% of sites visited were not using the register at all. There will be many others who are not adding all their machines, or adding incorrect information. There will also be an unknown number of sites who only complete the register correctly when an audit is about to take place (usually these are booked in with sites 2 weeks in advance). While the register is useful for locating self-declared sites, the machine data within is often of very limited value. CESAR ECV would be a much more reliable dataset to tap into, providing a national independent database of detailed machine information, accompanied by a clear, tamper-evident labelling system and QR functions.

Making compliance practical enables firmer enforcement and strengthens the credibility of the policy as a whole. In combination, the measures below would have a transformative impact on the capacity of the Merton team, compliance outputs and emission savings. This would dramatically increase the schemes value-for-money and scalability without any additional funding from GLA or boroughs.

NRMM Stakeholder Recommendations:

2.1 Assess whether Temporary Stop Notices could be used to prohibit the use of specific non-compliant machinery. If this is deemed to be a viable enforcement option, produce guidance for Local Planning Authorities to support and encourage this approach.

2.2 Update inspection KPIs to exclude sites with no in-scope machinery. This would still encourage officers to seek out smaller sites, but would also discourage visits to sites with no inspectable machinery. Adopting the recommendations in Sections 4 and 5 later in this paper would bring more machine types into scope, further reducing wasteful visits.

2.3 Only allow the 5-day grace period to be used once per principal contractor per site. Once this 1-time flexibility has been used, sites may still remove non-compliant machinery to avoid enforcement action but would not receive a compliance certificate.

2.4 Mandate CESAR ECV labelling and reduce administrative compliance burdens. This would make non-compliant machinery easier for sites and Local Authority officers to identify, with many additional benefits:

- A more accurate and comprehensive database than self-declared machine details on the NRMM register.
- Opportunities to reduce administrative burdens on compliant machines. GLA website could be simplified to the registration of site details and exemption applications only. This would also address the issue of retrofit being incorrectly treated as an exemption, as covered in Section 3 of this position paper. Type approval numbers can still be checked if necessary, but would no longer need to be recorded separately.
- CESAR is already established and trusted by national public sector organisations such as the police NCATT team, and may create a more attractive proposal for scaling to other cities.
- Discussions with hire companies indicate that most machines are fitted with these labels already, and the cost of fitting ECV labels would be justified by improvements in enforcement & efficiency.
- The CEA (owner of the CESAR Scheme) is happy to consider extensions to the CESAR ECV Scheme to aid the inspection process.
- The CESAR ECV scheme is governed by an industry board and committee, and owned by the Construction Equipment Association, an independent not-for-profit organisation.

2.5 Ensure boroughs make a fair contribution. Huge investment is being made by the London construction supply chain in cleaner equipment, well into the hundreds of millions of pounds. It is only right that Local Authorities should be required to pay their fair share towards enforcement activities. Under current arrangements, relatively modest £4000-per-borough contributions can be influenced by local politics, leading to inconsistency and uncertainty in enforcement delivery. LIP funding should be ring-fenced to ensure each borough is forced to pay their NRMM project membership, and the requirements should be uniform across all London boroughs.

---

3. Simplify Exemption Criteria

Current exemption criteria are complex, opaque, and open to interpretation. Complex grey areas such as cost, safety, quotations and email correspondence open the door for both abuse and genuine justified dispute. In a sector as diverse as NRMM it is very difficult to maintain a level playing field, so exemption frameworks need to be designed in a way that makes them as rare as possible, and qualifying criteria must be as clear and verifiable as possible.

The Short-term/Emergency exemption introduces unnecessary confusion. Inspections would not be carried out on sites that are suffering a disaster situation that may require NRMM to be brought to site to resolve, such as burning, flooding or structural collapse. Emergency situations are a natural exception to the rule and should be treated as such. Where a retrofit is waiting to be fitted, it should not be given an exemption and signed off as compliant, as the site will not be due another audit for some time so there is a significant risk that the retrofit commitment will not be upheld.

Retrofits are not an exemption, but are treated as such on the NRMM website, giving them a false 12-month expiry date. This could be resolved by adopting recommendations in Section 2.

The Viability Exemption can be applied for where a machine is not available on the market at the required stage and retrofit is unviable, with cost and safety both acknowledged as potential limiting factors. The current exemption process is to register the machine details on the NRMM website, then select the exemption type from the following options: ‘Emergency / Existing Exemption / Other / Retrofit‘. There is no option for a ‘Viability‘ Exemption, so it is presumed that the applicant should select ‘Other‘.

They are then asked to submit details of the reason for the exemption request in a text box that is limited to 250 characters. There is a document upload function, but this is optional. While the exemption requests are awaiting approval the exemption is active. The GLA aim to respond to exemption requests within 10 working days, which is significantly longer than some type of machines stay on site, like truck-mounted cranes and pumps. There is also no formal appeals process.

No direction or instruction is given during this process to indicate the criteria or evidence that sites are expected to meet or provide. However, separate guidance produced by the NRMM enforcement team; *Non-Road Mobile Machinery (NRMM) Practical Guide v.6* (the 'Practical Guide') states that "evidence must be provided to demonstrate that compliant equipment and retrofit solutions are not available, such as statements from suppliers and/or manufacturers". This is not clear or mandatory on the NRMM website.

The technical criteria for Stage V generator exemptions is also unclear on the NRMM website. Compared with Stage IIIA sets, Stage V generators are more sensitive to low-load operation. While some sites can maintain sufficient load to avoid issues, spiky load profiles are common in construction, and extended periods of low load can quickly damage these generators, which can result in power failure. Battery storage can be paired with Stage V generators to mitigate this issue; however, battery availability and cost are potential barriers. The industry remains unclear on the GLA's position regarding exemptions in these circumstances. Battery availability is difficult to verify, but regulators could make reasonable attempts to locate a suitable one on the market, if provided with project specifications. A phased approach may be required to ensure realistic expectations in fleet investment timelines (for example, focusing on major or public sector sites first). Cost is a complex factor that it is very difficult to draw boundaries for, especially when SMEs are involved. Introducing cost as an exemption consideration should be avoided wherever possible by adjusting the overall framework to phase-in this technology as above and minimise the prevalence of cost challenges.

Currently, there is no specific 'generator' exemption, so it is assumed that this would fall under the Viability exemption. Again, the Practical Guide provides greater insight into exemptions in these scenarios, which appear to be treated slightly differently to the traditional Viability Exemption. Evidence required is listed as:

1. Evidence that the site has requested a Stage V generator and the supplier's response.
2. Loading data demonstrating the site power demand, or a description of the power demand where this is not available.
3. A statement from the supplier dated within the last 6 months, that details their current Stage V solutions and outstanding orders to demonstrate that they are working towards a Stage V fleet.

While the industry broadly agrees with points 1 and 2, point 3 requires suppliers to share information with their customers that may be commercially sensitive. Exemption assessments should be based on whether there are complaint alternatives available on the market at the point the exemption application is being made, not projected future purchasing plans which are subject to change and may be commercially sensitive.

Exemptions are designed to address exceptional circumstances so will always be vulnerable to undefined and variable parameters. However, there are grey areas that can and should be addressed, especially those which are becoming or expected to become more common. New exemption criteria and retrofit clarifications are also required for the Stage IV to Stage V transition in 2030, which is discussed in detail in Section 4.

Straightforward exemption provisions reduce administrative burden, prevent audit hold-ups, improve compliance, and support consistent enforcement.

NRMM Stakeholder Recommendations:

3.1 Exemption decisions should be made by NRMM Officers who have a greater understanding of case-specific technical and financial risks than the GLA, and their direct contact with suppliers and OEMs enables them to verify claims effectively. While maintaining a level playing field in these complex cases will always be a challenge, we feel that NRMM Officers are best qualified to make that judgement call. There should be a defined appeals process for any disputes to be escalated to GLA.

3.2 Define clear supportive document requirements. The following specific evidence should be demanded in every Viability exemption application:

- **a)** The specification sheet for the machine seeking an exemption.
- **b)** Statements from 3 separate suppliers confirming that a compliant machine has been requested by the customer but is not available.
- **c)** A statement from at least 1 EST-approved retrofit supplier explaining that retrofit has been requested but is unviable and detailing the reasons for this, i.e. obstruction of cab visibility, proximity to sensitive or flammable components, ECU incompatibility, backpressure exceedances etc (unless there are no EST-approved retrofit options for that type & size of engine, in which case this criteria would be deemed as satisfied by default)
- **d)** A summary of what efforts have been made to source a compliant machine, and why one cannot be used (this could remain as an open textbox but character limit should be substantially increased).
- **e)** Optional document upload for any additional evidence the applicant wishes to provide.

The applicant should not be able to submit the exemption request until each of the mandatory documents have been uploaded. The exemption process should also include a clear warning that reasonable attempts will be made by enforcement officers to assess the validity of any claims made within the application.

3.3 Update guidance and website functionality to accommodate recommendation 3.2 and hand-hold sites. Open-ended text box and upload functions would be replaced by specific mandatory documentation before the exemption can be submitted. Wording on the website, exemptions policy and Practical Guide will also need to be updated, and an email should be sent to all NRMM account holders highlighting these clarifications/strengthened processes. Industry stakeholders can support with 'IMPORTANT UPDATES' to the wider industry.

3.4 Exemption rejections must contain highly detailed feedback on why the exemption was refused to provide clarity and allow for any slight clarifications to be made. As mentioned in 3.1 there should be a defined appeals process for any disputes to be escalated to GLA.

3.5 Pending retrofits should not qualify for an exemption. Pending retrofits allow for significant disruption and abuse of the audit process. Sites should be considered non-compliant until the machine has been swapped or retrofit installation has taken place.

---

4. Stage IV to Stage V Transition

According to the LAEI 2022, the entire construction NRMM fleet is responsible for less than 0.4% of particulate emissions in London, and only 1.6% of particulates from construction. NRMM enforcement data shows that 76% of equipment in London is already Stage V, and the London zone only covers machinery between 37-560kW.

There is no difference in NOx limits between Stage IV and Stage V, and reductions in particulates will only be realised on engines that did not have a DPF fitted to meet Stage IV (which CEA estimate to be almost two thirds of Stage IV engines). There is no environmental benefit in replacing a Stage IV machine that is already fitted with a DPF, as the emission levels are identical. Exemptions should be issued for any Stage IV machines that are already fitted with a DPF, which can be confirmed by enforcement officers through visual inspection and checking the systems listed on type approval plates.

By 2030, Stage IV machines that remain in use will largely be expensive long-life assets or machines owned by small SMEs. Specialist assets are not necessarily one-off bespoke items, this can also include machine types that are fairly common on the market but not in huge numbers, like crawler cranes and piling rigs. In cases where retrofitting a DPF is unviable for reasons such as those listed in recommendation 3.2(c) of this paper, cost and residual value can become major barriers to machine replacement. Stage IV resale markets have already shrunk dramatically as a result of US tariffs, poor market acceptance of AdBlue systems in unregulated territories, and the declining attractiveness of UK exports competing with cheaper international exporters.

Resale difficulties weaken a businesses' borrowing and investment capacity, as the sale of an existing machine often provides the deposit for its replacement. Asset resale also provides financial resilience during difficult trading periods, allowing businesses to offset losses. Where machines cannot be resold, operators may instead be forced to lay off staff to remain viable.

As mentioned in Section 3, financial viability is an inherently difficult and sensitive basis for exemption decisions. The level of risk can vary considerably between equipment types and business models, making clear, consistent and fair criteria almost impossible to establish. We would welcome proposals from the GLA on how these high-stakes judgements can be designed out of the policy framework wherever possible, while still acknowledging the serious threat that Stage IV residual value poses to many SME and specialist fleet operators.

All things considered, the Stage IV to Stage V transition may lead to particulate reductions in isolated cases, but is unlikely to have a material impact on London-wide air quality and will require exemptions to be carefully managed to avoid disproportionate costs. Therefore, replacing Stage IV machines 37-560kW with Stage V should not be the core focus of the 2030 transition. The focus of the NRMM London Zone should shift towards expanding the emission requirement to areas with greater environmental benefit, such as smaller equipment and industries beyond construction.

Until Stage V, smaller machines have for the most part been subject to no emission controls whatsoever. For engines 19-37kW Stage V bring significant reductions in both NOx and PM (2.8g/kWh and 0.585g/kWh respectively). Below 19kW, until Stage V there were no emission requirements at all. At these much smaller sizes exhaust filtration systems encounter significant technical challenges, so the Stage V exhaust levels are not as impressive as on larger equipment, but would still be a significant improvement versus 'uncertified' models. There are also a much greater number of these smaller machines working in London than larger long-life Stage IV assets. Manufacturers have directed significant R&D towards cleaning up these smaller machines, but this currently receives no recognition or demand drivers from GLA. Stage V equipment at these engine sizes has been manufactured since 2019, so it is hoped that by 2030 there will be good availability even for SME suppliers.

Other sectors like TV & Film, highways, events, and other NRMM users could also be brought into scope. This introduces emission requirements and enforcement checks to those machine markets in London, helping to familiarise and prepare those sites and suppliers ahead of an overall aim to drive uptake of non-diesel technology. GLA could also consider encouraging expansion to other UK cities, with support from central government and regional authorities.

With the 2030 requirements only 3 years away, GLA urgently need to engage with industry on these issues.

NRMM Stakeholder Recommendations:

4.1 Confirm exemption provisions for Stage IV machines already fitted with DPF as these machines already meet Stage V emission levels.

4.2 Consider policy design options that address financial risks arising from replacement of Stage IV machinery and associated impacts on residual value, SMEs and specialist fleet operators. The preferred approach should reduce the need for subjective, high-stakes financial viability decisions within the exemption process.

4.3 Redirect 2030 policy focus towards sub-37kW. Potential air quality improvements here are much greater and come with less financial risk. This will help to drive uptake of technologies that are proven and available in the market, and high confidence of availability in 2030. EST Retrofit policies would also need to be updated to account for sub-37kW machines.

4.4 Redirect 2030 policy focus towards other industries and cities. Again, potential air quality improvements here are much greater, and equipment that has been removed from London construction may have relocated to other cities, or still be operating within London but in a different industry.

---

5. Reconsider the 2040 Zero Tailpipe requirement

The NRMM Stakeholder signatories of this paper agree that signals for a zero-tailpipe requirement are premature. Such a requirement restricts compliant technology options to electric or hydrogen fuel cell, but there are many limiting factors in cost, infrastructure, technical capabilities, practicality and wider market demand that make the rate of uptake highly uncertain. The extreme nature of this requirement, and the gap between these aspirations and current market reality, presents a cliff-edge in 2040 that the industry cannot meaningfully prepare for.

It is also damaging investment prospects for other emerging clean technologies including hydrogen combustion engines, which are not classified as 'zero tailpipe' in the UK and would therefore effectively be banned in London from 1st January 2040. The general consensus across industry is that future fleets will need to consist of a broad mix of technology.

This opens a wider issue around technology neutrality. Air quality and climate policies are frequently developed in isolation, demanding simultaneous investment pathways. A zero-tailpipe ambition underestimates the complexity of transitioning such a highly diverse sector as NRMM. As is the case here, air quality policies can draw investment away from technologies that are good for climate, like Biodiesel, HVO, Biomethane and Hydrogen ICE. Policy design across the UK needs to allow deliverable progress in both even if this means perfection in neither. Until the future technology mix becomes clearer, policy must remain flexible about which technologies can contribute.

LAEI 2022 data shows that exhaust emissions from construction machines is a very small part of the overall emissions in London (PM <0.4%, NOx <3%). So even if a zero-emission target was implemented and successful, it would have limited impact on air quality in London. Given the very large cost and impact to the industry to achieve this, it is not justified from a cost-benefit point of view. The industry is not aware of any analysis that GLA have conducted to justify this target.

Consideration will also be needed toward international direction of travel and resale markets, as most equipment is sold internationally at the end of its UK life, and technology acceptance overseas will affect residual value. Global resale markets have not yet emerged, uptake is slow even within Europe, and countries like China and Netherlands where uptake is higher are unlikely to buy second-hand equipment from the UK. A loss in resale value reduces cashflow, borrowing power and investment capacity, and broadens the gap between cash deposit and finance for new fleet. It also means that 100% of the capital investment will need to be recovered in the price to end customers, driving inflation in the cost to build in the UK.

The signatories of this paper request that while these significant uncertainties remain, GLA removes any such future zero-tailpipe targets. London can remain aspirational without excluding credible ICE pathways. In fact, the GLA can position itself as a global leader in practical NRMM emissions policy by developing a stronger real-world understanding of future technology pathways and identifying solutions that can realistically scale, not just in the UK but across a broad range of international markets.

As an existing industry group, the London NRMM stakeholders should be key to discussions around any national decarbonisation policies being considered at present. Due to the wide variety of duty cycles, site constraints and operational requirements across the NRMM sector, any future policy will need to remain technology-neutral, and the supply chain is likely to require significant support from central government both financially and politically.

The recommendations below aim to replace the looming uncertainty of 2040 with a more practical and measured approach.

NRMM Stakeholder recommendations:

5.1 GLA should reconsider the 2040 ambition, replacing this requirement with a more fluid long-term technology-neutral aspiration until such time when a cemented target becomes appropriate. This should include conducting a thorough analysis of NRMM emissions and national policy, and a planned review of this analysis in 2030 and 2035.

5.2 In the meantime, support the exploration of alternative technologies by identifying specific public sector projects in London that can be used as pathfinder projects to trial next-generation NRMM technologies. These learnings can also help inform the aspirations in recommendation 5.1. Relevant lessons may also be drawn from the Lower Thames Crossing (LTC), although its exceptional scale and bespoke contracting arrangements mean that findings on cost and operational viability cannot be readily transferred to typical London sites without careful validation.

5.3 In parallel with the London NRMM LEZ, make site power a key focus area in London. Significant emissions reductions can be achieved through better planning, sizing, management and utilisation of temporary site power systems. A range of technologies and operational approaches are already available and could be deployed at scale today. London could become a leader in this area through policies that encourage efficient specification and operation of site power, supported by industry expertise and best-practice guidance. An independent study by London borough of Merton found that solutions like hybrid power can reduce generator run time by 85% and burn 57% less fuel.

Conclusion

The London NRMM policy has been successful because it combined ambition with practicality. To continue this trend, the next phase must focus on delivering cost-effective emission reductions and navigating a realistic transition pathway away from fossil fuels.

The proposals set out in this paper are designed to:

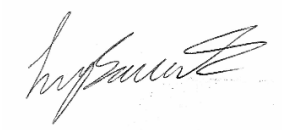
- Greatly strengthen environmental outcomes
- Improve compliance and confidence
- Reduce unnecessary burdens
- Support innovation without destabilising the construction sector

The proposals outlined in this paper are designed not only to support industry but also to improve the effectiveness and value of the NRMM policy for London. By simplifying administration, improving enforcement efficiency and focusing investment on technologies that are available today in areas that materially improve London air quality, these measures can deliver greater emissions reductions for every pound spent by both industry and public authorities.

We strongly encourage the GLA, NRMM Officers and wider NRMM stakeholders to engage openly on these recommendations, to re-establish NRMM policy as a genuinely collaborative, evidence-led framework.

The NRMM Stakeholders are ready to work with the GLA to take these proposals forward.

Yours sincerely,





Luis Bassett
Decarbonisation & Sustainability Manager
Construction Plant-Hire Association (CPA)

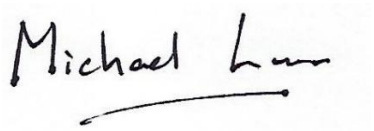
Viki Bell
Chief Executive Officer
Construction Equipment Association (CEA)







Neil Smith
Director General
Association of Manufacturers and suppliers of Power generating Systems



Michael Lunn
Chief Executive
Environmental Industries Association Ltd