

LONDON ASSEMBLY

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Sian Berry AM
Chair of the Transport Committee

Sadiq Khan, Mayor of London
(Sent by email)

4 August 2022

Dear Sadiq,

I am writing to submit the views of the London Assembly Transport Committee to your consultation on proposals to expand the Ultra Low Emission Zone (ULEZ) London-wide, and amend the Mayor's Transport Strategy (MTS). These comments are also being copied to Transport for London (TfL).

The Committee held an evidence session about the proposals on 12 July 2022. We would like to thank Alex Williams, Director of City Planning at TfL, and Christina Calderato, Director of Transport Strategy and Policy at TfL, for attending the meeting. During the session we also heard from Elliot Treharne, Head of Air Quality at the GLA as well as representatives of user and expert groups Inclusion London, Mums for Lungs, the RAC Foundation and the Federation of Small Businesses. Evidence from this session has informed the Committee's response.

The Committee welcomes TfL's commitment to tackling the problem of air pollution in London, as well as the important issues of climate change and road traffic. This letter provides the Committee's consensus view on some of the questions posed within the consultation survey. Individual Assembly Members or groups may also respond separately.

Discounts, Exemptions and Reimbursements

How important do you consider it is to continue to have these existing discounts and exemptions and reimbursements for the ULEZ? Do you think we should provide any further discounts, exemptions or reimbursements for the ULEZ?

The Committee heard from Laura Vicinanza, Policy and Stakeholder Engagement Manager at Inclusion London, that Deaf and Disabled Londoners will be disproportionately affected by the proposal to expand the ULEZ London-wide without further discounts and exemptions. Laura Vicinanza told the Committee that some of the impacts felt by disabled Londoners would otherwise include financial hardship, social isolation and social exclusion. Laura Vicinanza gave evidence that one of the main impacts she has seen from the current ULEZ scheme is many disabled people having to: *“limit their day-to-day activities when it comes to attending medical appointments, for example, or visiting friends and family.”*¹

Steve Gooding, Director at the RAC Foundation, told the Committee that there are several groups of Londoners that will be disproportionately affected by the ULEZ proposals including low-income households, disabled Londoners, small businesses and parents travelling with small children. He told the Committee of the need to find the right balance between promoting the health benefits of improving air quality and the mitigations that are needed for those that will be disproportionately affected by the proposals.

The Committee heard from Sarah King, Development Manager at the Federation of Small Businesses, that the main impact felt by small businesses would be the cost of upgrading vehicles, and provided suggestions to tackle this (see below in response to the question about scrappage).

The Committee was pleased to hear from TfL officers during the evidence session that they are listening to feedback from user groups as part of this consultation, are taking this feedback on board and looking at how the current proposals for exemptions and reimbursements can be improved.

Laura Vicinanza told the Committee that the current eligibility criteria for exemptions is very strict and excludes many people with mobility impairments.² TfL’s current proposed grace period, until October 2027, is only for vehicles registered with the DVLA with a ‘disabled’ or ‘disabled passenger vehicle’ tax class. To be eligible for this, an individual must score 12 points on their Personal Independence Payment (PIP) assessment, which qualifies you for the enhanced rate of the mobility component of PIP. This excludes those who score 8-11 points and qualify for the standard rate of the mobility component of PIP.³

Inclusion London is campaigning for the exemption criteria to be extended to include all Blue Badge holders.⁴ The Committee heard from Christina Calderato, Director of Transport Strategy and Policy at TfL, that Blue Badges are linked to a person, rather than a vehicle, and the individual can nominate different vehicles to use with their Blue Badge, and that it may be challenging to use Blue Badges as exemption criteria.⁵

However, the Committee believes that the criteria currently proposed are too strict and that those with mobility impairments should not be penalised as a result of this. **The Committee**

¹ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

² London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

³ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

⁴ Inclusion London, [Inclusion London’s briefing – The proposed expansion of ULEZ to Greater London](#)

⁵ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

recommends that TfL should look again at these exemptions and work to establish and administrate exemption criteria that are more reasonable for disabled Londoners.

The Committee also heard from Laura Vicinanza that the existing NHS reimbursement scheme, which provides an exemption for those who are assessed as too ill, weak or disabled to travel to an appointment on public transport, is a good measure for supporting those needing to attend hospital appointments. However, Laura Vicinanza also told the Committee of a number of issues that exist with the scheme, including a lack of awareness of the scheme, that GP appointments are not covered by the scheme and that some people are not able to afford the payment upfront to be reimbursed later.⁶ **The Committee would like to see these issues addressed, and for TfL to make efforts to raise awareness of the mitigation measures available.**

Scrappage

For the London-wide ULEZ proposal the Mayor is considering a large-scale and targeted vehicle scrappage scheme to support Londoners, including, for example, those on low incomes, disabled people, charities and businesses. How important is it that the proposed expansion of the ULEZ is supported by a scrappage scheme?

The Committee heard evidence from Inclusion London, the Federation of Small Businesses, Mums for Lungs and the RAC Foundation about the importance of a well thought-out and comprehensive scrappage scheme to accompany any expansion of the ULEZ. Elliot Treharne, Head of Air Quality at the GLA, then told the Committee that: *'the Mayor is absolutely committed to making sure that there is a scrappage scheme to provide targeted support and that the Mayor wants that to be as large as is practicable.'*⁷

The Committee heard from Sarah King, Development Manager at the Federation of Small Businesses, that many small businesses cannot afford to replace their vehicles at the moment and that often it can be difficult to find ULEZ compliant commercial vehicles. Sarah King said: *"If businesses could feel assured that there is going to be a scrappage scheme, I think they will look forward to doing the right thing and look to try to upgrade their vehicles to become compliant across the London region if it does end up going ahead."*

The Committee offers the following suggestions for how a London scrappage scheme, which is yet to be developed, could work:⁸

Modified vehicles

The scrappage scheme related to the expansion of the ULEZ to the North and South Circular roads had two grant payments for those who wished to scrap a non-compliant vehicle: £1,000 to

⁶ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

⁷ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

⁸ The Labour Group has submitted a dissenting note as they strongly believe central Government should create a significant national scrappage scheme to support motorists to switch to cleaner vehicles that are ULEZ compliant. This would be in line with the support Government has given to other cities across the UK to support scrappage of polluting vehicles. We believe this is essential to ensure the ULEZ expansion delivers the maximum improvement in air quality, while working for all Londoners, particularly those who need to drive for work or caring responsibilities, and for mobility reasons.

scrap a motorcycle or moped and £2,000 to scrap a car.⁹ Laura Vicinanza told the Committee that, for disabled people whose vehicles require adaptations, £2,000 to scrap their car is not sufficient since the average cost of an adapted wheelchair-accessible vehicle is around £30,000.¹⁰ Laura Vicinanza told the Committee that some clinically vulnerable people cannot use public transport and others cannot switch to walking and cycling so, for these Londoners, using a car is the only option. Without a comprehensive scrappage scheme these individuals could face financial hardship. **The Committee recommends that TfL considers covering the additional cost of replacing adapted and modified vehicles for disabled people as part of a future scrappage scheme.**

Alternatives to replacing vehicles

The Committee was pleased to hear that TfL is looking at alternative incentives and mitigations than simply replacing non-compliant vehicles with compliant vehicles. The London Assembly Environment Committee heard from Christina Calderato during an Environment Committee meeting in February 2022 that, in advance of the October 2021 ULEZ expansion, the scrappage scheme included a promotion of alternatives such as car clubs and cycle hire.¹¹ Jemima Hartshorn from Mums for Lungs told the Committee about the potential benefits of offering people who are scrapping their car further alternative options as part of any scrappage scheme, such as funds for an e-bike or to use on public transport, and that schemes such as this are being run in other countries.¹² **The Committee recommends that TfL considers a comprehensive scrappage package, with incentives to take up alternative ways of getting around through mobility credits, which could include free membership of car clubs and shared bike hire and additional travelcard value, to help Londoners to make more sustainable choices.**

Additional measures to reduce air pollution

Inclusion London, the Federation of Small Businesses, Mums for Lungs and the RAC Foundation all agreed that it would be beneficial for the proposed expansion to be introduced in combination with other measures to reduce air pollution in London. Suggestions included improvements to public transport and the accessibility of public transport (particularly in outer London), improvements to electric vehicle infrastructure, a commitment to phasing out diesel cars and cleaning up vehicles used by key workers.¹³ During our evidence session, the Committee welcomed Ms Calderato's acknowledgement that tackling these issues will require a holistic, multifaceted approach within the wider measures in the MTS. **The Committee recommends that TfL continues to consider the importance of introducing further measures to tackle the challenges of air pollution, the climate emergency, congestion, and safety caused by road traffic, and articulates more specifically in summary in its final proposals how existing plans will do so.**

⁹ TfL, [ULEZ Car and motorcycle scrappage scheme](#)

¹⁰ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

¹¹ London Assembly Environment Committee, [Transcript of Agenda Item 5 – Air Pollution in London](#), Feb 2022

¹² London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

¹³ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

Auto Pay

How important is it that we remove the annual £10 Auto Pay administration fee per vehicle (for the ULEZ, the Low Emission Zone (LEZ), and the Congestion Charge)?

Ms Calderato told the Committee that this measure will help Londoners to sign up for an account and reduce the likelihood of individuals accidentally incurring a Penalty Charge Notice (PCN).¹⁴ The Integrated Impact Assessment for the proposals states that the removal of the Auto Pay registration fee would adequately mitigate the negative impact of an increase in PCN levels and may have a positive impact for people who might otherwise forget to pay the charge.¹⁵ **The Committee welcomes TfL's proposal to remove the £10 Auto Pay registration fee and agrees that this measure will help remove a cost barrier for paying the ULEZ charge, and looks forward to considering the relevant cost-benefit analysis in due course.**

The Mayor's Transport Strategy

The Committee agrees that the changes proposed to the MTS provide clarity on how TfL plans to develop future potential smarter, fairer road user charging schemes, as well as the proposed ULEZ expansion.

The Committee questioned TfL officers on the impact of the ULEZ scheme on overall traffic levels. TfL officers told the Committee that they predict the proposals would result in 146,000 fewer car trips a day. The Committee asked for a breakdown of the type of journeys that will be reduced, including the people affected, the types of journey affected, the other options available to them, and the overall transport impact. TfL officers told the Committee that they do not have a breakdown in terms of journey purpose and that a very small percentage of journeys would see a mode shift. **The Committee asks TfL to look more carefully at data that show the purposes of the journeys that are most affected by new charges as part of a further impact assessment before any decision is made on the proposals.**

Committee members also asked guests whether the issue of road danger is sufficiently captured by the new wording in the MTS that describes the multiple challenges faced by London that road charging schemes might tackle, but omits the issue of road danger. Christina Calderato gave assurance that other policies within the MTS give sufficient ability for TfL to use road danger as a criteria for any future schemes. **The Committee nevertheless recommends, for additional clarity, that the issue of road danger also be included in specific new wording for Proposal 24.1.**

Future development of road user charging

If we develop a future road user charging scheme to replace existing schemes, what elements should be considered?

The Transport Committee has in the past been broadly supportive of the principle of the Mayor developing specific road user charging proposals in London - albeit with differing views on the purpose of those proposals. The Committee has also previously called on the Mayor to develop a

¹⁴ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

¹⁵ TfL, [Improving air quality and Londoners' health, tackling climate change and reducing congestion](#), May 2022

replacement for the central London Congestion Charge in its 2017 report *London Stalling: Reducing Traffic Congestion in London*.¹⁶ The full text of Recommendation 1 in that report was:

“In the short-term, the Congestion Charge should be reformed, so the payments levied better reflect the impact of vehicles on congestion. The daily flat rate should be replaced with a charging structure that ensures vehicles in the zone at peak times, and spending longer in the zone, face the highest charges.

“For the longer-term, the Mayor needs to start to develop proposals now for replacing the Congestion Charge with a new citywide road pricing scheme, which charges vehicles according to the extent, location and timing of their road usage. Road pricing could also replace Vehicle Excise Duty, which should be devolved by the Government to the Mayor. There may be a case for the scheme to be wider than the existing Congestion Charge zone; discussions with all boroughs should take place to determine whether and how road pricing should cover their local road network.

“The Mayor’s forthcoming Transport Strategy should set out plans for both Congestion Charge reform and for the potential introduction of road pricing. The Mayor should also update the committee by the end of April 2017 about discussions with the government on the devolution of Vehicle Excise Duty.”

However, two dissenting views to the recommendations were also published with the report, one from a Conservative AM and one from a UKIP AM, both of whom opposed further road charging schemes on broad principles.

The Committee heard from Ms Calderato that the intention of a future road charging scheme would be to replace and integrate the schemes currently operating (the ULEZ, LEZ and Congestion Charge), with a single scheme and single charging system.¹⁷

The Committee notes that TfL is in the early stages of developing any future scheme, and that Londoner’s views will help shape this as part of the consultation. **The Committee believes it is important that Londoners are involved in the development of any future scheme at every stage, including in devising how the scheme will work, particularly those with protected characteristics, health concerns, a defined need to drive, or low incomes.** It will also be essential that any proposals put forward in future consultations are supported by a clear indication of where any funding generated by schemes will be invested, and how it will support broader strategic goals. **The Committee asks TfL to provide a clear assessment of costs and benefits for any future scheme alongside any future consultation.**

We look forward to seeing revised text for the MTS proposals, which we will consider for a formal response.

¹⁶ London Assembly Transport Committee, [London Stalling: Reducing Traffic Congestion in London](#), January 2017. and see [Appendix 1 and Addendum for minority reports](#).

¹⁷ London Assembly Transport Committee, [Agenda for Transport Committee on 12 July 2022](#)

In addition, later this year the Committee is planning an investigation to look in more detail at the future development of smarter, fairer road user charging, and we look forward to engaging further with TfL and your team at that time.

We would be grateful if you could provide a response to this letter by 14 September 2022. Please copy your response to Eleanor Haigh (eleanor.haigh@london.gov.uk), the Committee's Policy Advisor.

Yours,

A handwritten signature in black ink, appearing to read 'Sian Berry', with a stylized flourish at the end.

Sian Berry AM
Chair of the Transport Committee