

## ULEZ consultation, phase 3b – London Assembly Response

The Mayor, through Transport for London (TfL) is conducting a formal consultation on expanding the Ultra-Low Emission Zone (ULEZ).<sup>1</sup>

The Environment Committee is submitting this response on behalf of the London Assembly. The response is agreed by a majority of the Committee. Dissenting views, from the Conservative and UKIP Members, are noted in the appendix.

### Zonal charges already in place or already ordered

London has had a Congestion Charge since 2003, covering a specified area of central London (referred to here as the central zone) and imposing a daily charge of £11.50 on most vehicles at specified times (broadly, during working hours).

From 2008 (with standards tightening until 2012) London has had a Low Emission Zone, covering approximately the whole Greater London area, and charging more polluting larger vehicles. The daily charge is £100 for larger vans and minibuses not meeting the Euro 3 standard, and £200 for heavy lorries and coaches not meeting the Euro IV standard.

In October 2017 an Emissions Surcharge of an additional £10 on top of the Congestion Charge came into effect for most older (pre-Euro 4) vehicles, in the same hours as the Congestion Charge, in the same central zone.

As ordered by the last Mayor, Boris Johnson, the ULEZ was to come into effect in September 2020, and to apply to the central zone, at all times. The current Mayor, Sadiq Khan, has ordered that the initial, central ULEZ will be brought forward to April 2019.

The ULEZ will impose a daily charge of £12.50 (for light vehicles) or £100 (for heavy vehicles) on most more polluting (pre-Euro 4 for petrol, pre-Euro 6 for diesel) vehicles. This will replace the Emissions Surcharge, as vehicles and users become liable for it. The different Euro standards for petrol and diesel vehicles are on paper approximately equivalent in terms of emissions, though on-the-road compliance with the standard is an issue for many current diesel cars.

These zonal charges are part of a raft of air pollution policies implemented, proposed or called for by successive Mayors. Some, such as standards set by TfL for buses operating in central London or on routes in specified Low Emission Bus Zones, or emissions standards for taxis and minicabs, work alongside the Emissions Surcharge and ULEZ to reduce the presence of the most polluting vehicles on London's roads or in certain areas of London.

### Strengthening measures on air pollution

The Environment Committee at the time found that the ULEZ ordered by the last Mayor did not go far enough. It recommended that the scheme cover a wider area, be introduced sooner than 2020, and the charge to increase over time to have a stronger effect. The

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<sup>1</sup> [https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-3b/#air\\_quality\\_impacts](https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-3b/#air_quality_impacts)

committee also underlined the importance of making vehicle-switching affordable for affected drivers, and supported the Mayor's call for a national diesel scrappage scheme.

The current Mayor has been making proposals to take forward some of the Committee's main recommendations, implementing the central charge earlier, and widening the zone to cover an extended inner zone for light vehicles and London-wide for heavy vehicles.

### **Formal consultation proposals for bringing forward the ULEZ**

The formal proposals in the current consultation include:

- Tightening the existing LEZ for heavy vehicles in October 2020, to match the ULEZ standard of Euro VI, London-wide;
- Widening the ULEZ for light vehicles in October 2021, to cover a zone reaching up to, but not including, the North and South Circular Roads.

TfL projects that these proposals will reduce NO<sub>x</sub> emissions London-wide by 20 per cent in 2020, and NO<sub>x</sub> emissions in inner London by 30 per cent in 2021.

### *Response*

As in previous consultation responses, we urge wide and early implementation of the ULEZ.

We welcome the tightening of the LEZ standard to match the ULEZ for heavy vehicles London-wide, and the daily charges for vehicles that do not comply. This should not be delayed beyond the proposed date in October 2020. Preferably, we would support introduction earlier, before the end of the current mayoral term in May 2020.

For light vehicles, we continue to support the principle of expansion beyond central London, but recommend a wider expansion and an earlier expansion date.

The proposed boundary within the North and South Circulars would be a minimum: we would support further consideration of wider boundary options, and the most preferable option would be for a London-wide ULEZ for both light and heavy vehicles.

Alternatives for a wider zone could include placing the North and South Circular roads themselves in the zone, incentivising drivers to find a wider range of alternative options, rather than simply diverting onto these already-congested roads. The A406 North Circular, a purpose-built orbital highway, carries heavy traffic even without the ULEZ, while the urban streets designated the A205 South Circular have in many places just a single lane each way, and are not suitable to receive traffic diverted from trunk roads such as the A2 and A3.

There is demand from boroughs for areas outside the North and South Circulars to be included.<sup>2</sup> Particular consideration should be given to south London, where the A205 cuts through inner London much more closely than the North Circular does. In the south, the

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<sup>2</sup> See for example the responses to Phase 2 consultation in which 14 boroughs, plus pan-London local government bodies, supported further expansion <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-two/> page 61

proposed boundary bisects the inner boroughs of Wandsworth, Lambeth, Southwark, Lewisham and Greenwich, whereas in the north it passes through Barnet, Enfield and Waltham Forest in outer London, fully encompassing Camden, Islington, Hackney and even Haringey. If an inner zone with a diversionary road boundary is chosen, sections of the A232 are more equivalent to the A406 North Circular than is the A205. Extension to the A232 is the minimum that is required to bring symmetry between north and south London, although our preference is to have the ULEZ and LEZ at the same boundary.

Extending the ULEZ to all of London for light vehicles as well as heavy would simplify the zonal structure, largely remove the discrepancies between north and south London, and offer the purpose-built orbital M25 motorway as a diversionary route.

We consider that the proposed expansion date of October 2021 is too late. We note that the Mayor has previously proposed a 2020 expansion. We recommend expansion be implemented by the end of the current Mayoral term in May 2020, at the latest.

Looking beyond 2020, and considering the announcements of future diesel bans from several other world cities, the potential to remove Euro 6 diesels from exemption should be considered, if forthcoming real-world driving emission standards do not reduce emissions rapidly and effectively. Earlier dis-exemption of diesels could be considered in the central zone. We welcome that the Mayor has signalled an intention for a zero emissions standard in 2025, and recommend that further details of this proposal, and steps towards it during the early 2020s, be published to give an appropriate signal to drivers, operators and the vehicle industry.

### **Other measures**

We continue to support the Mayor's calls for the national government to take tougher action on air pollution, including a nationally-funded diesel scrappage scheme. This would both reduce the costs of the ES and ULEZ to drivers, and enhance their air quality impact, by facilitating switching to cleaner vehicles.

We also support the devolution of Vehicle Excise Duty (VED or 'road tax') to London, enabling the Mayor to set rates that take into account air pollutants as well as CO<sub>2</sub> emissions, and to retain revenue raised in London for London use rather than seeing it reserved for the national strategic road network, almost all in other parts of the country.

Our calls on the Government are set out more fully in our 2017 response to the consultation on the national Air Quality Plan.<sup>3</sup>

As the Committee has also previously stated, running through the Mayor's transport emissions work should be a priority on traffic reduction, with complementary measures to enable modal shift to buses, trains, walking and cycling. The experience of reducing car journeys between 1991 and 2011, and during the 2012 London Olympics, show how Londoners can adapt their travel behaviours. Less traffic on the roads can reduce

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<sup>3</sup> <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/london-assembly-response-national-air-quality-0>

congestion, improve journey times and reliability including for buses, and further encourage sustainable travel choices.

We have likewise drawn attention to other air pollution issues, including emissions from private hire vehicles, river transport and non-transport sources.

## Appendix: Dissenting views

### View from the GLA Conservatives

The GLA Conservatives, whilst we welcome the Mayor's attention to air quality in London, are unable to support this response. We are particularly concerned about the impact of the Mayor's proposals to widen the ULEZ beyond the Congestion Charge Zone. We would certainly not support the recommendation to further extend the ULEZ London-wide for cars and vans.

We do not feel that there would be sufficient benefit, in going beyond the original ULEZ proposals, to justify the additional restrictions and costs to vehicle owners – especially residents and small businesses – or the impact on London's economy that these measures are likely to bring. This would place a particularly unfair burden on small businesses, especially those that do not operate in central London, forcing them to cover the costs of pollution generated by larger businesses. The loss of struggling small businesses would devastate local communities.

We continue to strongly support the original ULEZ scheme in central London, as a targeted and effective way of tackling London's worst polluted areas. However, a larger ULEZ would ultimately mean many areas without poor air quality would be paying for those that do, for the sake of very marginal improvements compared with the original plans. In our view a much fairer and more effective way of tackling pollution beyond central London would be more targeted measures at pollution hotspots, such as Heathrow and other areas.

With this in mind, we would therefore request that our opposition to this Committee response be noted, as well as our opposition to the Mayor's proposals an expanded ULEZ.

### View from the UKIP Group

#### ULEZ

We support the original plan announced by the previous Mayor to introduce a ULEZ in the congestion charging zone in 2020 with exemptions for Euro 4, 5 and 6 petrol engines and Euro 6 diesel engines. The implementation date should not be brought forward.

Any ULEZ should be targeted in the areas which have pollution levels above WHO levels. There are two areas which are most affected are: the central congestion charging zone and Heathrow. We would also support a Heathrow ULEZ where NO<sub>2</sub> levels are particularly high with the same exemptions and a long enough notice period for businesses to adapt without being put in danger of liquidation from extra overheads.

Motorists and businesses need enough forward notice as possible to adapt to plans, especially as they bought into diesel on the advice of the previous government. There will be a decrease in emissions from diesel vehicles in the area as vehicle owners begin to convert to cleaner vehicles ahead of the introduction of the zone itself. A notice period of 5 or 6 years is adequate, so an implementation date of 2023 for a Heathrow ULEZ would be acceptable

We also support investigating the effects a possible total diesel ban in the Central and Heathrow areas with a 10 year notice period.

#### *Vehicle Excise Duty*

UKIP does not support the devolution of Vehicle Excise Duty payment from the Department of Transport to the Mayor of London.