

Boris Johnson  
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London Assembly  
City Hall  
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London, SE1 2AA

30 July 2013

Dear Boris

### **Proposed Ultra-Low Emission Zone**

On 12 July the Environment Committee met with your Environment and Political Adviser, Matthew Pencharz, and officers from the GLA and TfL, and would like to record its thanks to them for their participation.

The meeting discussed issues of air pollution and in particular the proposal that you announced on 13 February to establish an Ultra-Low Emission Zone (ULEZ) in central London in 2020.

As the Committee has for several years supported the idea of a more stringent low emission zone or zones in the most polluted parts of London, we welcome your announcement and have been keen for some months to find out more detail.

It seems that Transport for London is still at an early stage of developing your proposal: it is preparing to consult on a range of options, including:

- light-touch zone based on a CO<sub>2</sub> standard
- a medium option based on the Euro VI emissions standard
- high-impact zone admitting only 'zero-emission' vehicles

TfL told the Committee it is also planning to consult on different options for the hours of operation of the zone, the exact boundary of the zone and potential exemptions.

At Mayor's Question Time on 17 July, you opened an additional aspect of the scope of the zone by indicating that the zone would apply to new vehicles from its implementation date only, and not to vehicles already on the road. Pending information on the comparative effect of these different approaches, the Committee strongly recommends that the all-vehicles approach not be ruled out, and remain part of the options to be consulted on by TfL later this year.

If the zone is to be applicable to all vehicles, no standard lower than Euro VI seems likely to have a significant benefit. This Committee has heard repeatedly that, under diesel vehicles standards lower than Euro VI, not only are permitted NO<sub>x</sub> emissions at least 125% higher than under Euro VI, but also that even these looser standards are not in practice met in urban driving. Your own adviser has made it clear to us that the failure of the pre-Euro VI standards is a major reason why NO<sub>2</sub> concentrations in London remain stubbornly high.

If the zone is to be applicable to new vehicles from its implementation date only, you rightly identified to the Assembly that Euro VI would be a meaninglessly low standard; such vehicles are already on the road and Euro VI will have been the industry-wide standard for all new models for 4 to 6 years by 2020. Such a zone should require new vehicles entering to meet industry-leading standards of its day, which can be expected to include zero tailpipe emissions for most if not all vehicle types.

Modelling is also still to be carried out for the effects of the zone on vehicle choice and travel behaviour, and therefore for the likely effects in practice of the zone on total emissions and concentrations at locations across London. This modelling is essential for estimating the costs and benefits of the scheme; it should be done thoroughly and its results published for the different options as part of the consultation later this year.

The Committee has not seen from TfL any modelling of the likely impact of a new-vehicles-only zone against an all-vehicles zone, or a zone with different standards for new and legacy vehicles. Such modelling, year by year leading up to and following implementation, would need to be published alongside the consultation if these options are to be considered.

At the same 12 July meeting, this Committee heard of recent research for Defra by Kings College London and others<sup>1</sup>, which reportedly suggests that per-vehicle emissions may be up to 25% greater in practice than currently estimated in the LAEI modelling. Please provide a like-for-like comparison of the average exhaust emission factors in g/km for NO<sub>2</sub> a) used in the most recent London Atmospheric Emissions Inventory and b) implied by the measurements in the Defra report, for each of the ten vehicle categories used in the ULEZ briefing given to the Committee<sup>2</sup>.

Can you assure the Committee that the Defra findings will be taken into account in the modelling on which decisions about the ULEZ are to be based? Please also state what traffic figures are used as the basis for the 2020 emissions modelling used in the analysis.

Following the 2013 consultation we urge that the necessary measures to establish the ULEZ be put in place with all due speed. The Committee fully supports your aim to ensure that the ULEZ is established by London-wide political consensus and necessary legal instruments by the end of the current Mayoral term in 2016.

The Committee also considers that 2020 is a late date to bring in an effective measure to tackle air pollution in central London, and therefore suggests that earlier implementation date options should be evaluated in the modelling, and included in the consultation. With over 4,000 premature deaths attributable to air pollution each year, Londoners cannot be expected to wait until 2020 for decisive action to be taken.

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<sup>1</sup> 'Remote sensing of NO<sub>2</sub> exhaust emissions from road vehicles', Defra 2013 [http://uk-air.defra.gov.uk/library/reports?report\\_id=754](http://uk-air.defra.gov.uk/library/reports?report_id=754)

<sup>2</sup> Articulated HGV, rigid HGV, non-TfL bus/coach, TfL bus, diesel LGV, petrol LGV, diesel car, petrol car, taxi, motorcycle.

TfL's briefing to the Committee on the ULEZ shows projected NO<sub>2</sub> concentrations across London in 2020, without the effects of the ULEZ. As well as the large central/inner area projected to be in breach of limit values, there are also shown solid areas around Heathrow Airport and Docklands, and a network of roadside breaches spreading far across the suburbs. We heard that TfL is preparing an air quality action plan with further measures to reduce emissions and exposure. The development of this action plan should consider ULEZ-type measures as well as others to eliminate limit value breaches, and to protect the health of Londoners by bringing down overall exposure, London-wide.

The Committee will consider a response to the TfL consultation later in the year, but would be very grateful if you can answer the questions raised in this letter by Friday 30 August, to enable the Committee to note your response at its next meeting. If an electronic copy of your response could go to the Committee's project officer Matt Bailey ([matt.bailey@london.gov.uk](mailto:matt.bailey@london.gov.uk)) that would be most helpful.

Yours sincerely



**Murad Qureshi AM**

Chair of the Environment Committee