LONDONASSEMBLY
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Transport for London
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To Whom it May Concern,

ULEZ Expansion Consultation

I write on behalf of the Liberal Democrat Group on the London Assembly in response to TfL's consultation on improving air quality and Londoners' health, tackling climate change and reducing congestion.

As the Deputy Chair of the London Assembly Transport Committee I also welcome the attendance of TfL officers at the meeting on 12 July 2022 about the proposed Ultra Low Emission Zone (ULEZ) expansion and thank them for their engagement.

In preparing our response, we have engaged with local residents, councillors, parliamentarians and community organisations.

The Case for Expansion

London faces some serious and complex challenges in terms of cleaning up our capital's polluted air, tackling congestion on our busy roads and contributing to the global effort to combat the existential threat of climate change. These problems require bold solutions.

A study led by Queen Mary University of London, King's College London and the University of Edinburgh found that annual exposures of nitrogen dioxide (NO2) and other nitrogen oxides (NOx) amongst primary school children in London commonly resulted in a loss of approximately 5 per cent in lung capacity.[1]

The case for expansion is made even stronger in view of findings from an Imperial College London report published in 2019, which revealed that around 4,000 premature deaths in London were attributable to air pollution. The majority of these deaths were in the outer London boroughs, where the ULEZ currently doesn't apply.

[1] https://www.qmul.ac.uk/media/news/2018/smd/study-of-2000-children-suggests-london-air-pollution-is-restricting-lung-development.html

Given the urgency of tackling the triple threat of air pollution, congestion and climate change, in principle I support the outlined proposals for expansion of the ULEZ to cover Greater London, but this must go hand in hand with more investment in public transport in outer London to help Londoners with modal shift and with a longer timescale for introduction.

History of ULEZ

When the concept of ULEZ was first proposed and announced in March 2015, I strongly supported the scheme. In 2016, when the Mayor then announced a policy consultation on extending the ULEZ, which was ultimately implemented in October 2021, I argued for the North Circular Road and South Circular Road to be included in the zone. Only now, as part of the further proposed expansion expected in August 2023, is this being done.

Lack of Information

I am concerned about the delayed publication of the six month report and further interim information requested through written mayoral questions on the most recent expansion in 2021. This is important alongside the consultation. It is wrong that no information on the vehicle scrappage scheme has been published.

Londoners were notified of the most recent expansion of the ULEZ to its current boundary three years and four months prior to its implementation. I have been contacted by groups of Londoners and local councillors who are concerned that, when the consultation period for the further proposed expansion concludes at the end of July, there will only be one year to prepare for the expansion. Given the fact that this expansion will be on a similar, if not larger, scale than the previous one, I do not believe that it is reasonable for households and businesses to be expected to make arrangements in such a short period of time, particularly in view of the cost-of-living crisis and the lack of detail around the scrappage scheme.

Vehicle Scrappage Scheme Details

The published documents' failure to provide any detail on what the vehicle scrappage scheme might entail is unacceptable. It is incredibly important that Londoners have access to this omitted information, as only then will they be able to submit fully informed responses to the consultation. This is particularly in view of the fact that many of these Londoners will be feeling the crunch of the cost of living crisis. As it stands, TfL is in effect asking Londoners to respond to a consultation of which the full details are not yet known. In my view, this is an entirely unreasonable ask on the part of TfL and the Mayor.

While I broadly welcome the consultation, I do not believe that TfL should have launched the consultation without full knowledge of the details of the vehicle scrappage scheme.

I would also like to highlight that, during the last scrappage scheme, more people applied for grants than received them. The proposed ULEZ expansion in August 2023 is expected to cover around the same number of homes as the previous one in October 2021. With the added financial and mental pressures of the rising cost of living on Londoners, I sincerely hope that TfL therefore accepts that considerably more than £61 million should be the baseline figure for a new scrappage scheme. Any future vehicle scrappage scheme must be comprehensive and should fully include low-income and lower middle income households, as well as small businesses, charities and disabled Londoners.

In order to effectively reduce air pollution and support the mode shift towards more sustainable forms of transport, any vehicle scrappage scheme will need to be wide-ranging and offer a variety of incentives to encourage Londoners to scrap their polluting vehicles.

At the London Assembly Plenary meeting on 9 June 2022, I asked the Mayor whether mobility credits would feature as part of any vehicle scrappage scheme. I did not get a commitment. Mobility credits would offer Londoners the chance to scrap their car for credits to spend on appropriate shared mobility options, such as car clubs, bike hire and other public transport.

TfL should look at supporting mobility hubs and car clubs alongside any expansion of the ULEZ.

In order to meet the Mayor's current targets to reduce all traffic by 10-15 per cent and for 80 per cent of all trips in London to be made by walking, cycling or public transport by 2041, the vehicle scrappage scheme needs to not just support the purchase of new, less polluting vehicles, but also actively encourage investment in sustainable transport modes, such as cycling. Simply replacing an old vehicle with yet another vehicle will not ease congestion. This work needs to be done in conjunction with delivering new cycling infrastructure, such as bike stands and making our capital's roads safer for cyclists.

Disabled Londoners

At the London Assembly Transport Committee Meeting held on 12 July 2022, Laura Vicinanza, Policy and Stakeholder Engagement Manager at Inclusion London stated that some disabled people struggled to make the adaptations they required to their vehicles with the sum of £2,000 available through the previous scrappage scheme. Any future scrappage scheme must consider and accommodate the individual requirements of disabled Londoners. This will require engagement with disabled Londoners and disability groups, in addition to the ongoing consultation.

I have received clarification that TfL currently does not hold any specific data on the compliance of vehicles registered to disabled or disabled passenger tax class or data on the proportion of non-compliant vehicles with mobility impaired users that are not registered in the disabled or disabled passenger tax class. I believe TfL should at least quantify how many people are included in those brackets and may therefore be affected.

I would also welcome a review of the end dates set for exemptions for disabled and disabled passenger tax class vehicles (Sunday 24 October 2027) and minibuses used for community transport (Sunday 26 October 2025). TfL needs to consider broadening any exemptions or delays for compliance to ensure disabled Londoners are not left unable to travel in the city.

Further Concerns

While I appreciate and welcome the decision to consult on the possibility of expansion the ULEZ to cover most parts of outer London, I am concerned that the timeframe is being dictated by the electoral cycle.

The wider issues of tackling air pollution extend well beyond the introduction of the ULEZ extension. Once the construction phase is completed, the Silvertown road tunnel is currently expected to increase road traffic and congestion at either end of the tunnel. This will have a profound impact on local air pollution levels, which are feared to get worse. Particularly in view of the fact that 4,000 premature deaths in London can be attributed to air pollution and that 500,000 Londoners suffer from asthma and are vulnerable to the effects of highly polluted air, the messaging from the Mayor on cleaning up London's air is not conducive to the policies that are being implemented, such as the construction of the Silvertown tunnel. It therefore seems rather disingenuous for the Mayor to be boasting about cleaning up London's polluted air, while at the same time ploughing ahead with the polluting and costly Silvertown tunnel project.

The concerning proposals outlined in TfL's Central London Bus Review consultation, which would see extensive cuts and reductions in frequency to many of London's bus routes, will not build passenger confidence in the reliability of our capital's public transport network at a time when the whole direction of public policy should be on reducing private car use and ownership. Downgrading the level of public transport provision in any part of London could risk kickstarting a vicious cycle of decline. It is therefore disappointing that the ULEZ expansion proposals are not being presented alongside plans for improvements in public transport provision in outer London boroughs, for example through establishing new orbital bus routes.

Before the Go Sutton Bus Trial was suspended as a result of the coronavirus pandemic, the customer satisfaction survey from November 2019 found that 60% of Go Sutton customers would use their car less in favour of demand responsive buses. I believe that the implementation of the ULEZ expansion, its objectives to reduce the use of polluting vehicles and curb carbon emissions, should be coupled with the reintroduction of demand responsive bus schemes, such as Go Sutton.

I have been made aware that some Londoners are concerned about whether their vehicles will be ULEZ compliant in August 2023 and unaware of the online compliance checker. I would like to see a more concerted effort to reassure Londoners by informing them of this tool, not just through social media channels, but via email and other forms of communication. This is also vital for small businesses.

I would also like to raise concern regarding the five mayoral questions submitted in May and July 2022 that have so far not yet been answered, but could provide vital information to Londoners:

- *What was the total monetary value for ULEZ-related Penalty Charge Notices (PCN) issued to drivers of vehicles registered outside of the current ULEZ boundary in the month (a) January (b) February (c) March and (d) April 2022?*
- *What was the total monetary value for ULEZ-related Penalty Charge Notices (PCN) issued to drivers of vehicles registered within the current ULEZ boundary in the month (a) January (b) February (c) March and (d) April 2022?*
- *How many Penalty Charge Notices (PCN) for ULEZ non-compliance were issued to drivers of vehicles registered outside of the current ULEZ boundary in the month (a) January (b) February (c) March and (d) April 2022?*
- *How many Penalty Charge Notices (PCN) for ULEZ non-compliance were issued to drivers of vehicles registered within the current ULEZ boundary in the months (a) January (b) February (c) March and (d) April 2022?*
- *What was the ULEZ compliance rate in the area covered by the ULEZ extension for the months of (a) January, (b) February, (c) March and (d) April 2022?*
- *How can you reasonably expect Londoners to submit a fully informed response to the ongoing ULEZ consultation given that details of the scrappage scheme have not been announced?*
- *The Go Sutton customer satisfaction survey from November 2019 found that 60% of Go Sutton customers would use their car less in favour of demand responsive buses. Do you believe that the implementation of the ULEZ expansion and its objectives to reduce the use of polluting vehicles and curb carbon emissions should be coupled with the reintroduction of demand responsive bus schemes, such as Go Sutton?*

Future Road User Charging

I think it is a mistake to have started a conversation on road user charging in the same consultation as the proposed expansion of the ULEZ. Whilst connected, they are separate and have worried Londoners.

I have long argued for the introduction of a smart form of road user charging. In the 2021 London Liberal Democrat manifesto we argued that "London should be the first city in the country to pioneer a smart, fair

and privacy friendly pay-as-you-go road charging scheme". We also asserted that an inclusive and London-wide public consultation should help set a fair pricing scheme and decide on exemptions and discounts.

Given that discussions on future road user charging have commenced, it is vital that TfL considers all concepts and ideas, from the method of pricing to other factors that should also be considered in the application of a new scheme. The concepts which would need to be considered include, but are not limited to, distance and location driven, the time of day, the type of vehicle or the number of journeys. Other factors which need to be taken into account are household income, the provision of available public transport alternatives and the number of journeys.

It is vital that any new infrastructure and equipment for the forthcoming ULEZ expansion is futureproofed and able to support any potential form of road user charging if introduced at a later date. It should also be noted that existing Low Emission Zone (LEZ) infrastructure should be adapted and repurposed to support the expansion of the ULEZ.

Any form of future road user charging scheme needs to be accompanied by improvements to public transport and active travel, be clear to drivers, enforceable and cost effective and have mitigations in place to protect residents on roads which border the road user charging zone. The scheme will also need to ensure that charges are matched to people's income, take account of the needs of businesses and workers, and offer exemptions or discounts to blue badge holders. Some Londoners may also have privacy concerns in relation to their personal data and information being shared. These would need to be addressed. Similar to the ULEZ expansion, a further scrappage scheme would be needed to support behavioural change.

Conclusion

While the Liberal Democrat Group on the London Assembly welcomes this public consultation and principally supports the expansion of the Ultra Low Emission Zone to cover the current Greater London boundary it is clear that these proposals need to be delivered alongside a comprehensive package of investment in public transport, particularly in the outer London boroughs, and a wide-ranging scrappage scheme with mobility credits. We also would urge you to delay your proposed start date to give Londoners the time and support to change vehicles and their travel.

Yours sincerely,



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Leader of the Liberal Democrat Group