

Report to Mayor (MTS revision consultation)

**12-13**

October 2022

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# 1. Introduction

## 1.1. Purpose of this document

1.1.1. Transport for London (TfL) has developed various proposals to help improve air quality, tackle the climate emergency and reduce traffic congestion, including:

- A limited revision of the Mayor's Transport Strategy (MTS) which would set out the triple challenges London is facing and provide that road user charging (RUC), including Ultra Low Emission Zone (ULEZ) expansion, should be used to address them;
- Expanding the ULEZ scheme to outer London so that it would operate London-wide;
- Removing the annual £10 per vehicle Auto Pay registration fee for the Congestion Charge, ULEZ and Low Emission Zone (LEZ);
- Increasing the Penalty Charge Notice (PCN) level from £160 to £180 for non-payment of the Congestion Charge and ULEZ daily charges;
- Minor changes to the Congestion Charge and LEZ Scheme Orders of an administrative nature; and
- Asking for views on shaping the future of RUC in London.

1.1.2. A description of the development of options is given at section 1.3.

1.1.3. The public and stakeholders were invited to give their views on each of the proposals in a consultation held over a ten-week period between 20 May 2022 and 29 July 2022.

1.1.4. The focus of this report is solely on the first proposal listed above: the proposed revision of the MTS (the draft text of which is at Appendix A1; referred to in the remainder of the report as 'the Proposed MTS Revision'). The Mayor is asked to make a decision in respect of the Proposed MTS Revision in advance of and separately from any decisions on the other proposals. This is because in order to comply with procedural requirements relating to RUC schemes,<sup>1</sup> the second proposal (expansion of the ULEZ scheme London-wide) may only be implemented if the Proposed MTS Revision is published. If the Proposed MTS Revision is made, that will make it possible, in principle, to expand the ULEZ. However, whether or not to expand the ULEZ is a separate decision that the Mayor would be asked to take at a later stage if the Proposed MTS Revision is published.

1.1.5. Publication of the Proposed MTS Revision is also subject to the Mayor laying the final draft version of the revision before the London Assembly and the Assembly not resolving to reject it.

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<sup>1</sup> These are set out in schedule 23 to the Greater London Authority Act 1999.

1.1.6. The decision-making sequence can be summarised as follows:

- The Mayor will be asked to decide whether to publish the Proposed MTS Revision taking into account this report and all other relevant information and advice provided to him.
- If the Mayor's decision is to proceed with publication, he must first lay the final draft version of the revision before the Assembly which may resolve to reject it within 21 days.<sup>2</sup>
- If the Assembly does not reject the revision, it may be published. Several post-publication tasks must then be undertaken.
- Following publication of the revision, the second set of decision documents relating to all of the other consultation proposals will be submitted to the Mayor for his consideration.
- If the Mayor decides to implement the proposals, the changes will come into force on the relevant dates set out in the decision and accompanying documents. The Mayor will also be asked to note the views given on the future of RUC.

1.1.7. All the proposals listed in 1.1.1 were consulted on at the same time in a single consultation. This report refers to the proposals other than the Proposed MTS Revision where it is relevant to do so or if it is not possible to separate comments on the Proposed MTS Revision from comments on the other proposals, notably the scheme proposal for expansion of the ULEZ London-wide. Decisions on the proposals other than the Proposed MTS Revision will be made separately from and subsequently to the decision on the Proposed MTS Revision.

1.1.8. The purpose of the consultation on the Proposed MTS Revision was for TfL (on behalf of the Mayor) to seek the views of the public and stakeholders on the revision and supporting relevant material so that the Mayor has the benefit of these responses when deciding whether to publish the revision or not.<sup>3</sup> Revising the MTS is subject to statutory procedure which requires that certain bodies are consulted including any person or body that the Mayor considers appropriate to consult;<sup>4</sup> as with other consultations that have been undertaken in respect of mayoral strategies, the consultation was open to everyone. More information about the consultation process is given in section 3.

1.1.9. This report describes how the consultation was carried out, summarises and provides analysis of the consultation responses received in respect of the Proposed MTS Revision, and makes recommendations to the Mayor. It should be read in conjunction with the consultation materials<sup>5</sup> (described in

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<sup>2</sup> A motion to reject a draft revision must be considered at an Assembly meeting which members of the public are allowed to attend. A motion is only carried if it is agreed to by at least two thirds of the Assembly Members voting.

<sup>3</sup> Note that the Mayor delegated his powers relating to preparing a draft MTS revision and consulting on it to TfL pursuant to MD2987. The decision whether to publish the revision (subject to the London Assembly's consideration of it) is the Mayor's.

<sup>4</sup> See sections 42, 42A and 142 of the Greater London Authority Act 1999.

<sup>5</sup> <https://haveyoursay.tfl.gov.uk/cleanair>

Chapter 3) which contain more details of the Proposed MTS Revision, as well as information about its likely impacts and other relevant matters.

- 1.1.10. The Mayor will be asked to take into account the consultation responses (summarised in Chapters 4 and 5 in this report, and at Appendix B), this report and all the other information and advice provided in the decision document when making his decision.
- 1.1.11. A second report on all other proposals consulted on will be submitted to the Mayor following his decision on whether to publish the Proposed MTS Revision (and completion of the London Assembly procedural stage if the Mayor decides to proceed with publication). As part of the consultation, the Mayor also invited views on shaping the future of RUC in London. While no formal proposals were put forward, the responses will also be reported in the second report and will inform future policy development in this area.

## 1.2. Structure of report

- 1.2.1. The structure of this report is as follows:

**Chapter 1: Introduction** – The remainder of this chapter provides the background to the consultation, including the legislative framework which applies when a revision to the MTS is proposed.

**Chapter 2: Proposed revision consulted on** – A summary of the proposed revision and the assessed impacts, including the Strategic Environmental Assessment.

**Chapter 3: Consultation process** – A summary of the consultation process.

**Chapter 4: Consultation responses** – The outcomes of the consultation, including the number of responses received and who they were from.

**Chapter 5: Responses to issues raised** – Our responses to the key issues raised in relation to the proposals by theme.

**Chapter 6: Conclusions and recommendations** – Our overall conclusions and recommendations to the Mayor.

- 1.2.2. The individual consultation responses have also been made available to the Mayor for his consideration should he wish to read any particular responses in full.<sup>6</sup>

## 1.3. Option development and the identification of proposals for consultation

- 1.3.1. On 18 January 2022, the Mayor announced four potential approaches to address toxic air pollution, the climate emergency and traffic congestion in London, all of which involved charging for road use in order to reduce traffic /

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<sup>6</sup> Responses from members of the public have had personal data removed. Unless otherwise instructed, responses from stakeholders are passed on in full.

emissions from traffic.<sup>7</sup> The approaches that were under consideration by the Mayor were:

- Extending the ULEZ London-wide with the current vehicle charge levels and emissions standards.
- Extending the ULEZ London-wide and adding a small clean air charge for all but the cleanest vehicles.
- A small, London-wide, clean air charge for all but the cleanest vehicles.
- A Greater London boundary charge for non-London registered vehicles entering Greater London.

1.3.2. These options were themselves assessed in Next Steps for Reducing Emissions from Road Transport,<sup>8</sup> a report prepared by TfL for the Mayor and submitted to the Department for Transport in January 2022. This report provided a preliminary assessment of each option's potential in terms of reducing vehicle kilometres and, in doing so, reducing air pollutants and CO<sub>2</sub> emissions with the report noting that further work and detailed impact assessments would be needed if the options were to be taken forward. The report also considered 'next-generation' London-wide RUC.

1.3.3. After considering all the options, on 4 March 2022 the Mayor announced that he had asked TfL to consult on his preferred option: expanding the current ULEZ to outer London so that it would apply London-wide from 2023. This was because his preliminary view was that this option had the potential to strike the right balance between maximising the health and environmental benefits for Londoners while minimising the cost to drivers. In addition, the Mayor expressed the preliminary view that the long-term and fairest solution to these challenges will be a more sophisticated form of RUC, designed to be simple and fair for customers. This would enable all existing road user charges, such as the Congestion Charge and ULEZ, to be replaced with a single scheme. He asked TfL to start exploring how this concept could be developed, while acknowledging that it is still some years away from implementation. This option is not addressed further in this Report and is not directly relevant to the decision now before the Mayor.

## **1.4. Revising the MTS**

1.4.1. The MTS is the principal policy tool through which the Mayor exercises his responsibilities for the planning, development, provision, and management of transport in London. The Mayor is required to prepare and publish a transport strategy and to keep it under review.<sup>9</sup>

1.4.2. The MTS must contain the Mayor's policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities

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<sup>7</sup> <https://www.london.gov.uk/press-releases/mayoral/mayor-announces-bold-plans-for-a-greener-london>

<sup>8</sup> Next Steps for Reducing Emissions from Road Transport, TfL, January 2022: <https://content.tfl.gov.uk/next-steps-for-reducing-emissions-from-road-transport.pdf>

<sup>9</sup> Sections 41 and 142 of the Greater London Authority Act 1999. The following paragraphs also summarise key requirements of these sections.

and services to, from and within Greater London, his proposals for discharging his duty of exercising his powers for the purpose of securing the provision of those transport facilities and services, his proposals for providing accessible transport as well as a timetable for the implementation of such proposals and any other appropriate proposals.

1.4.3. In revising any of his statutory strategies, the Mayor must, amongst other factors, have regard to the principal purposes of the Greater London Authority (GLA) and the effect the revised strategy would have on the health of persons in Greater London, climate change and its consequences, and the achievement of sustainable development in the UK.

1.4.4. He should also have regard to:

- The need to ensure that the strategy is consistent with national policies (and EU obligations of the United Kingdom) as notified by the Secretary of State to the Mayor;
- The need to ensure that it is consistent with the Mayor's other strategies (set out in s. 41(1) of the Greater London Authority Act 1999);
- The resources available for implementation of the strategy; and
- The desirability of promoting and encouraging the use of the River Thames safely, in particular for the provision of passenger transport services and for the transportation of freight.

1.4.5. The Mayor should include in any revised strategy such policies and proposals as he considers best calculated to promote improvements in the health of persons in Greater London; promote the reduction of health inequalities between persons living in Greater London; contribute to the achievement of sustainable development in the United Kingdom; and contribute to the mitigation of, or adaptation to, climate change in the United Kingdom.

1.4.6. The MTS is key to defining the parameters of a RUC scheme. A scheme may only be made if it appears desirable or expedient for the purpose of directly or indirectly facilitating the achievement of any policy or proposal set out in the MTS.<sup>10</sup> A scheme must also be in conformity with the MTS, with schemes usually referred to and described in the MTS given their significance to the Mayor's discharge of the transport duty.<sup>11</sup> Revenue raised from RUC schemes must be used to facilitate the implementation of the MTS' policies and proposals.<sup>12</sup>

1.4.7. In May 2022, the Mayor directed TfL to prepare a draft revision to the MTS that would provide for the role of RUC in addressing the triple challenges of toxic air pollution, the climate emergency and traffic congestion, including as a next step, the potential expansion of the ULEZ London-wide. The Mayor also asked TfL to arrange for an integrated impact assessment to be undertaken and to consult the public and stakeholders on his behalf. The

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<sup>10</sup> Paragraph 3, Schedule 23, Greater London Authority Act 1999

<sup>11</sup> Paragraph 5, Schedule 23, Greater London Authority Act 1999

<sup>12</sup> Paragraph 16, Schedule 23, Greater London Authority Act 1999



Mayor's direction and the delegation of his relevant powers to TfL are set out in Mayoral Decision 2987.<sup>13</sup> The Proposed MTS Revision is the product of that direction.

### **1.5. Triple challenges: air pollution, the climate emergency, traffic congestion**

- 1.5.1. The MTS, published in 2018, sets out the Mayor's vision to create a fairer, greener, healthier and more prosperous London. It explains that a shift away from car travel in favour of walking, cycling and public transport will be critical to realising this vision and that is why the central aim of the strategy is for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041. This will support "Good Growth", that means growth that re-balances development in London towards more genuinely affordable homes, reduces car dependency and creates a more sustainable and socially integrated city. Achieving the aims of the MTS starts with an ambitious approach to London's streets, as that is where most travel happens.
- 1.5.2. As Mayoral Decision 2987 notes, the Mayor has previously announced an intention "to take bold action to urgently tackle" three major challenges in London: harmful air pollution; the climate emergency and congestion in London.

#### *Air pollution*

- 1.5.3. The Mayor has a duty to achieve the legal limits for air pollutants in Greater London. Air pollution has a negative impact on the health of Londoners and remains at illegal levels in some areas. It has a disproportionate impact on more vulnerable and deprived people and on Black, Asian and minority ethnic communities (BAME). The two pollutants of greatest concern, based on their impact on human health,<sup>14</sup> are:
- Nitrogen dioxide (NO<sub>2</sub>)
  - Particulate matter (PM)
- 1.5.4. The evidence demonstrates that real progress has been made in reducing these two pollutants:
- London-wide NO<sub>x</sub> emissions decreased by 18 per cent between 2016 and 2019.<sup>15</sup> Inner London road transport NO<sub>x</sub> emissions halved between 2013 and 2019. Comparatively, outer London NO<sub>x</sub> emissions from road transport fell by 31 per cent over the same time period, and in 2019 accounted for 28 per cent of London-wide NO<sub>x</sub> emissions. Road transport remains the predominant source of NO<sub>x</sub> emissions in London.

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<sup>13</sup> <https://www.london.gov.uk/decisions/md2987-revision-mts-and-road-user-charging-guidance>

<sup>14</sup> <http://www.who.int/mediacentre/factsheets/fs313/en/>

<sup>15</sup> NO<sub>x</sub> - generic 'oxides of nitrogen' - is the emission of concern for NO<sub>2</sub> concentrations

- Between 2016 and 2019, PM<sub>2.5</sub> emissions from road transport reduced by 14 per cent. This is higher than the overall reduction in PM<sub>2.5</sub> emissions from all combined sources over the same period (a reduction of five per cent). However, road transport still contributes a substantial proportion of PM<sub>2.5</sub> emissions. In 2016, road transport accounted for 33 per cent of PM<sub>2.5</sub> emissions and in 2019 this had only fallen slightly to 31 per cent.

1.5.5. Despite these recent improvements in air quality, air pollution in London remains the biggest environmental risk to the health of all Londoners. While NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> have all been reducing in London, the rate of reduction has been significantly slower in outer London. For example, the rate of reduction of NO<sub>x</sub> emissions from road transport has been at half the rate in outer London compared to that seen in both central and inner London. The same pattern emerges in relation to PM<sub>2.5</sub> emissions, which have fallen more slowly in outer London. This is due in large part to the introduction of the ULEZ in central and then inner London. There remains more that can and should be done to lower exposure human health, including going beyond existing UK air quality requirements.

1.5.6. All London residents now live in areas that are within the PM<sub>2.5</sub> UK legal limits (25 µg/m<sup>3</sup>), as shown in Table 2 **Error! Reference source not found..** For NO<sub>2</sub>, since 2016 there has also been a significant reduction in the number of London residents who live in areas which exceed the UK legal limits (40 µg/m<sup>3</sup>), with fewer than two per cent of Londoners (around 170,000) living in areas of exceedance in 2019.

**Table 1: Recommended WHO 2021 air quality guideline levels compared to interim targets and UK legal limits**

Pollutant	2010 Air Quality Legal Limits	WHO Interim target*				2021 WHO Air Quality Guideline
		1	2	3	4	
PM <sub>2.5</sub> µg/m <sup>3</sup>	25	35	25	15	10	5
PM <sub>10</sub> µg/m <sup>3</sup>	40	70	50	30	20	15
NO <sub>2</sub> µg/m <sup>3</sup>	40	40	30	20	-	10

\*WHO interim targets are proposed as incremental steps in a progressive reduction of air pollution and intended for use in areas where pollution is high

Source: WHO

1.5.7. However, there remains more that could be done to lower exposure to poor air quality as quickly and effectively as possible to protect human health. The Mayor has previously expressed an ambition to go beyond merely meeting

the UK's current legally mandated air quality requirements, in order to protect the health of Londoners.

- 1.5.8. In September 2021, the World Health Organization (WHO) updated its recommended guidelines for air pollutants<sup>16</sup> (also shown in Table 1). These guidelines reflect the up-to-date evidence that even low levels of exposure to pollutants can have an adverse impact on public health. In addition to the guidelines, the WHO has also provided interim targets aimed at promoting a gradual shift from high to lower concentrations in locations where air pollution is particularly high.
- 1.5.9. The UK government has recently consulted on new legal limits for PM<sub>2.5</sub>. The Mayor responded to that consultation and submitted that these new standards should be aligned with the new interim WHO targets and for the introduction of a revised, and lower legal limit for NO<sub>2</sub>.<sup>17</sup>
- 1.5.10. More needs to be done to reduce the significant number of Londoners who live in areas exceeding the lowest WHO interim target of 10 µg/m<sup>3</sup> (
- 1.5.11. Table 2) and the even lower guideline of 5 µg/m<sup>3</sup>. Although there has been a reduction in Londoners living in areas of exceedance since 2016, 88 per cent of Londoners still live in areas which do not meet the lowest interim target (10 µg/m<sup>3</sup>). All Londoners live in locations where concentrations exceed the guideline PM<sub>2.5</sub> limit of 5 µg/m<sup>3</sup>.

**Table 2: London residents living in areas of PM<sub>2.5</sub> exceedance by concentration level**

PM <sub>2.5</sub> concentration	London residents living in areas of exceedance		Proportion of population living in areas of exceedance	
	2016	2019	2016	2019
15 µg/m <sup>3</sup>	259,300	6,000	3%	0.1%
10 µg/m <sup>3</sup>	8,798,900	7,962,700	100%	88%
5 µg/m <sup>3</sup>	8,798,900	9,082,700	100%	100%

Source: LAEI

- 1.5.12. For NO<sub>2</sub>, almost a third of London residents live in areas which exceed 30 µg/m<sup>3</sup>, the level 2 interim target set by the WHO, and all Londoners live in areas which exceed the guideline of 10 µg/m<sup>3</sup>.

<sup>16</sup> [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health#:~:text=Guideline%20values,-NO&text=The%20current%20WHO%20guideline%20value,effects%20of%20gaseous%20nitrogen%20dioxide.](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health#:~:text=Guideline%20values,-NO&text=The%20current%20WHO%20guideline%20value,effects%20of%20gaseous%20nitrogen%20dioxide.)

<sup>17</sup> <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/consultation-response-new-government-environmental-targets>

**Table 3: London residents living in areas of NO<sub>2</sub> exceedance by concentration level**

NO <sub>2</sub> concentration	London residents living in areas of exceedance		Proportion of population living in areas of exceedance	
	2016	2019	2016	2019
40 µg/m <sup>3</sup>	2,065,700	173,700	23%	2%
30 µg/m <sup>3</sup>	7,933,400	2,796,300	90%	31%
20 µg/m <sup>3</sup>	8,798,900	8,995,100	100%	99%
10 µg/m <sup>3</sup>	8,798,900	9,082,700	100%	100%

Source: LAEI

- 1.5.13. In 2020, TfL and the GLA commissioned researchers from the Environment Research Group (ERG) at Imperial College London to assess the impact on health of the Mayor's air quality policies, and air pollution in London, using current (2019) and future levels of air pollution up to 2050 (projected from 2013). ERG's key findings were that in 2019, in Greater London, the equivalent of between 3,600 to 4,100 deaths (61,800 to 70,200 life years lost<sup>18</sup>) were estimated to be related to PM<sub>2.5</sub> and NO<sub>2</sub>.
- 1.5.14. If no further action is taken to reduce air pollution, around 550,000 Londoners will develop diseases related to poor air quality over the next 30 years. In this case the cost to the NHS and social care system in London is estimated to be £10.4 billion by 2050.<sup>19</sup> The greatest number of deaths related to air pollution<sup>20</sup> are likely to be in outer London boroughs, mainly due to the higher proportion of elderly people in these areas, who are more vulnerable to the impacts of air pollution.<sup>21</sup> Children are also more vulnerable to polluted air as their airways are still developing and they breathe more rapidly than adults.
- 1.5.15. There is a well-established and ever-growing body of scientific evidence linking exposure to air pollution with a number of adverse health effects. Since the launch of the consultation, an authoritative review of the overall evidence base showed that long-term exposure to traffic-related air pollution has adverse health effects including on death and ill health in different age groups.<sup>22</sup> Further, the UK's Committee on the Medical Effects of Air Pollutants (COMEAP) released its latest assessment now linking exposure

<sup>18</sup> The original studies were analysed in terms of 'time to death' aggregated across the population. Strictly, it is unknown whether this total change in life years was from a smaller number of deaths fully attributable to air pollution or a larger number of deaths to which air pollution partially contributed. The former is used with the phrase 'equivalent' to address this issue. See COMEAP (2010) for a fuller discussion

<sup>19</sup> <https://www.london.gov.uk/press-releases/mayoral/ulez-to-save-billions-for-nhs>

<sup>20</sup> Note that this is not a direct causative relationship at the individual level; it is a collective statistical impact across the population

<sup>21</sup> <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/health-burden-air-pollution-london>

<sup>22</sup> <https://www.healtheffects.org/publication/systematic-review-and-meta-analysis-selected-health-effects-long-term-exposure-traffic>.

to air pollution to dementia<sup>23</sup>, and other researchers have made important discoveries into how fine particulate air pollution might cause lung cancer in non-smokers.<sup>24</sup> Other research studies have also emerged on stroke<sup>25</sup>; found particulate air pollution in unborn babies<sup>26</sup> and showed air pollution as a risk factor in type 2 diabetes.<sup>27</sup>

- 1.5.16. Finally, taking action on air quality will also help to address health inequalities. Health inequalities are systematic, avoidable and unfair differences in mental or physical health between groups of people. These inequalities typically relate to age, ethnicity and income.
- 1.5.17. In 2021, a joint TfL/GLA study<sup>28</sup> explored the relationships between air quality and inequalities.<sup>29</sup> The study confirmed earlier findings that communities with higher levels of deprivation, or higher proportions of people from BAME backgrounds, are more likely to be exposed to higher levels of air pollution.
- 1.5.18. The gap between the most and least deprived areas of London for exposure to harmful nitrogen dioxide (NO<sub>2</sub>) has narrowed by up to 50 per cent since 2016. However, communities that have a higher level of deprivation, or a higher proportion of people from a BAME background are still more likely to be exposed to higher levels of air pollution.<sup>30</sup> In 2019, 45 per cent of residents living in London's most deprived areas lived in locations exceeding the interim target for NO<sub>2</sub> of 30 µg/m<sup>3</sup>, compared to 12 per cent of residents in London's least deprived areas. Londoners living in deprived areas are disproportionately exposed to, and impacted by, poor air quality and this situation persists despite overall improvements in air quality across the city. Low-income Londoners, who are less likely to own a car, are among this group which is disproportionately affected.
- 1.5.19. If the Mayor wishes to bring air quality standards in London into line with the revised WHO standards, and address existing health inequalities, that will

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<sup>23</sup> <https://www.gov.uk/government/publications/air-pollution-cognitive-decline-and-dementia>

<sup>24</sup> [https://www.thelancet.com/journals/lanonc/article/PIIS1470-2045\(22\)00569-1/fulltext#:~:text=%E2%80%9CAccording%20to%20our%20analysis%2C%20increasing,\(The%20Francis%20Crick%20Institute](https://www.thelancet.com/journals/lanonc/article/PIIS1470-2045(22)00569-1/fulltext#:~:text=%E2%80%9CAccording%20to%20our%20analysis%2C%20increasing,(The%20Francis%20Crick%20Institute) and <https://www.bbc.co.uk/news/health-62797777>  
<https://www.newscientist.com/article/2340056-air-pollution-raises-our-risk-of-a-stroke-and-its-later-complications/>

<sup>26</sup> [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(22\)00200-5/fulltext](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(22)00200-5/fulltext)

<sup>27</sup> [https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196\(22\)00122-X/fulltext#seccestitle150](https://www.thelancet.com/journals/lanplh/article/PIIS2542-5196(22)00122-X/fulltext#seccestitle150)

<sup>28</sup>

[https://www.london.gov.uk/sites/default/files/air\\_pollution\\_and\\_inequalities\\_in\\_london\\_2019\\_update\\_0.pdf](https://www.london.gov.uk/sites/default/files/air_pollution_and_inequalities_in_london_2019_update_0.pdf)

<sup>29</sup> Using data up to 2019

<sup>30</sup> Air Pollution and Inequalities in London: 2019 <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/air-pollution-and-inequalities-london-2019>

require (amongst other things) new and additional policy initiatives beyond those currently set out in the existing MTS.

### *Climate emergency*

- 1.5.20. We are facing a climate emergency: global warming will exceed 2°C during this century unless there are deep and rapid reductions in CO<sub>2</sub> and other greenhouse gas emissions. In February 2022, the UN's Intergovernmental Panel on Climate Change (IPCC) warned that global warming would cause unavoidable increases in multiple climate hazards and present multiple risks to ecosystems and humans<sup>31</sup>, with the most vulnerable the most at risk from adverse impacts.
- 1.5.21. In October 2021, the Government published a national net zero strategy setting out how it plans to meet the UK's legally binding emissions targets out to 2050. The strategy includes a range of policy measures alongside funding to support the UK's transition to net zero and is supported by its transport decarbonisation plan (July 2021).
- 1.5.22. In January 2022, the GLA published the Element Energy report<sup>32</sup> on London's 2030 net zero target and, in response to this, the Mayor announced his preferred pathway to net zero carbon.<sup>33</sup> This would require a 27 per cent reduction in car vehicle kilometres travelled on London's roads by 2030.
- 1.5.23. Twenty-five per cent of London's carbon emissions now come from road transport.<sup>34</sup> Some progress has already been made towards reducing vehicle carbon emissions in London. Between October and December 2019 there was an estimated six per cent reduction in CO<sub>2</sub> emissions in the central London ULEZ compared to a scenario with no ULEZ.<sup>35</sup> CO<sub>2</sub> emissions from cars and vans in the expanded inner London zone are expected to reduce by five per cent in the first year.<sup>36</sup>
- 1.5.24. However, much more remains to be done, including actions to reduce car vehicle kilometres travelled on London's roads by 27 per cent by 2030. Further policy initiatives that go beyond those set out in the existing MTS will be needed.

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<sup>31</sup>[https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC\\_AR6\\_WGII\\_SummaryForPolicymakers.pdf](https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf)

<sup>32</sup> Pathways to Net Zero Carbon by 2030, Element Energy, 2022, <https://www.london.gov.uk/what-we-do/environment/climate-change/net-zero-carbon-london/pathways-net-zero-carbon-2030#>

<sup>33</sup> Mayor press release 18 January 2022 <https://www.london.gov.uk/press-releases/mayoral/mayor-announces-bold-plans-for-a-greener-london>

<sup>34</sup> <https://content.tfl.gov.uk/next-steps-for-reducing-emissions-from-road-transport.pdf>

<sup>35</sup> Air quality in London 2016 – 2020 <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/air-quality-london-2016-2020>

<sup>36</sup> Expanded ULEZ First Month Report, GLA, 2021 [https://www.london.gov.uk/sites/default/files/ulez\\_first\\_month\\_report\\_december\\_2021.pdf](https://www.london.gov.uk/sites/default/files/ulez_first_month_report_december_2021.pdf)

*Traffic congestion*

1.5.25. Last year, the cost of traffic congestion in London was estimated to be £5.1 billion with the average driver losing 148 hours to congestion per year.<sup>37</sup>

Traffic congestion also delays vital bus services (making the bus a less attractive option for existing and potential bus passengers) and essential freight and servicing trips, makes public spaces unpleasant for walking and cycling, and worsens air pollution.

1.5.26. RUC schemes can contribute to reducing traffic congestion as demonstrated by the impact of the Congestion Charge in central London, which reduced traffic in the zone by 15 per cent when first introduced. The inner London ULEZ has only been in operation since October 2021 but early indications suggest it has contributed to a reduction of around 21,000 vehicles (around two per cent) in the expanded zone on an average day compared to the month before the launch of the scheme.<sup>38</sup>

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<sup>37</sup> <https://inrix.com/press-releases/2021-traffic-scorecard-uk/> This figure does not take into account the cost of congestion on bus passengers and bus operating costs.

<sup>38</sup>

[https://www.london.gov.uk/sites/default/files/expanded\\_ultra\\_low\\_emission\\_zone\\_six\\_month\\_report.pdf](https://www.london.gov.uk/sites/default/files/expanded_ultra_low_emission_zone_six_month_report.pdf)

## 2. Proposed MTS Revision

### 2.1. Introduction

- 2.1.1. This Chapter provides an overview of the Proposed MTS Revision. The draft text that was consulted on is at Appendix A1.

### 2.2. The Proposed MTS Revision: road user charging as a measure to address the triple challenges including through the London-wide expansion of the ULEZ

#### ***The MTS and RUC proposals***

- 2.2.1. The MTS (March 2018), outlines the Mayor's vision for transport in London, and sets out the policies and proposals that will contribute to achieving it. The overarching aim of the MTS is to reduce Londoners' dependency on cars and to increase the active, efficient and sustainable (walking, cycling and public transport) mode share in London to 80 per cent by 2041. An increase in the number of journeys made by sustainable modes, alongside a reduction in private car use, will not only support the overarching aim of the MTS but is key to addressing poor air quality, the climate emergency and traffic congestion.
- 2.2.2. The MTS sets out the Mayor's objective to reduce harmful air pollution from road transport. It explains that air pollution can exacerbate health conditions and shorten the lives of Londoners. It further notes that the communities suffering the most from poor air quality are often the most vulnerable in society. RUC schemes such as the ULEZ contribute to addressing these challenges and are integral to the MTS.
- 2.2.3. Policy 6 of the MTS states:
- "The Mayor, through TfL and the boroughs, and working with stakeholders, will take action to reduce emissions – in particular diesel emissions – from vehicles on London's streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures may include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/levies, responsible procurement, the making of traffic restrictions/regulations and local actions."*
- 2.2.4. The MTS then contains a number of proposals setting out how RUC can be used to further the aims and objectives of the Strategy. These include Proposal 20; Proposal 21 and Proposal 24.

#### Proposal 20

*The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes,*



*under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.*

#### Proposal 21

*The Mayor, through TfL, will investigate proposals for the next generation of road user charging systems. These could replace schemes such as the Congestion Charge, Low Emission Zone and Ultra Low Emission Zone. More sophisticated road user charging and/or workplace parking levy schemes could be used to contribute to the achievement of the policies and proposals in this strategy, including mode share, road danger reduction and environmental objectives, and to help reduce congestion on the road network and support efficient traffic movement. In doing so, the Mayor will consider the appropriate technology for any future schemes, and the potential for a future scheme that reflects distance, time, emissions, road danger and other factors in an integrated way. TfL will develop the design, operation and technical elements of these proposals in consultation with road users and stakeholders*

#### Proposal 24

*The Mayor, through TfL will seek to introduce the central London Ultra Low Emission Zone (ULEZ) standards and charges in 2019, tighter emissions standards London-wide for heavy vehicles in 2020, and an expanded ULEZ covering inner London in 2021.*

- 2.2.5. There are currently three RUC schemes in operation in London: the Congestion Charging scheme in central London, since February 2003; the LEZ, phased implementation from February and July 2008; and the ULEZ which was introduced in central London in April 2019 and subsequently expanded to inner London in October 2021. Table 4 provides more information on these schemes.

**Table 4: Overview of RUC schemes in London**

<b>Charging scheme &amp; area</b>	<b>Vehicles affected &amp; charge level</b>	<b>Hours of operation</b>	<b>Other characteristics</b>
<b>Central London Congestion Charge (Central London)</b>	All vehicles (subject to discounts and exemptions)  £15 per day	07:00-18:00, Monday to Friday and 12:00-18:00 Saturdays, Sundays and bank holidays	The objective of the scheme is to manage traffic and congestion in central London.  It was established in February 2003.

<b>Charging scheme &amp; area</b>	<b>Vehicles affected &amp; charge level</b>	<b>Hours of operation</b>	<b>Other characteristics</b>
<b>Low Emission Zone</b> <b>(London-wide)</b>	<p>Heavier, diesel vehicles (HGVs, vans, buses and coaches)</p> <p>Only vehicles which do not meet the specified emissions standards are liable to pay. The standards are:</p> <p>Lorries, heavy vans (over 3.5 tonnes), coaches, buses and minibuses (over 5 tonnes): Euro VI for NO<sub>x</sub> and PM  £100 charge if vehicle meets Euro IV or V for PM: £300 if does not meet Euro IV for PM.</p> <p>Vans and minibuses up to 3.5 tonnes: Euro VI (NO<sub>x</sub> and PM)  £100 charge if not compliant.</p>	<p>24 hours/day,  7 days/week</p>	<p>The charge acts as a deterrent to entering London in a vehicle that does not meet the emissions standard, and to encourage a switch to cleaner vehicles and thereby reduce air pollutant emissions.</p> <p>Phased implementation from February and July 2008; standards have been tightened over time, most recently in March 2021.</p>
<b>Ultra Low Emission Zone</b> <b>(Central and Inner London)</b>	<p>All vehicles (subject to minimal discounts and exemptions)</p> <p>Only vehicles that do not meet the specified</p>	<p>24 hours/day,  7 days/week</p>	<p>The objective of the scheme is to incentivise a switch to less polluting vehicles in order to reduce emissions and improve air quality.</p>

Charging scheme & area	Vehicles affected & charge level	Hours of operation	Other characteristics
	<p>emissions standards are liable to pay. The standards are:</p> <p>Motorcycles: Euro 3 (NO<sub>x</sub>)</p> <p>Petrol cars and vans up to and incl. 3.5 tonnes: Euro 4 (NO<sub>x</sub>)</p> <p>Diesel cars, vans up to and incl. 3.5 tonnes and minibuses up to and incl. 5 tonnes: Euro 6 (NO<sub>x</sub> and PM)</p> <p>£12.50 daily charge if emissions standard not met</p>		Central zone implemented in April 2019. Zone expanded to inner London in October 2021.

2.2.6. The existing schemes have been effective in dealing with local challenges and travel behaviour in London. When the Congestion Charge was introduced in central London in 2003, congestion was reduced by 30 per cent and traffic volumes by 15 per cent. The impact of the expanded ULEZ in October 2021 was observed even before it came into effect as people moved to cleaner vehicles in preparation for the expansion. In February 2017 (when the plans were first announced) only 39 percent of vehicles in the expansion zone complied with the ULEZ standard. In March 2019 that figure rose to 61 percent and in April 2020, more than 80 per cent of vehicles were compliant. Six months on from the expansion (May 2022), nearly 94 per cent of vehicles<sup>39</sup> seen driving in the zone met the emissions standards.

<sup>39</sup> Mayor of London press release, 19 July 2022 <https://www.london.gov.uk/press-releases/mayoral/londoners-breathing-cleaner-air-thanks-to-ulez>

### ***Developing the revision of Proposal 24***

- 2.2.7. Proposal 24 of the MTS has, in effect, served its purpose with each of the measures mentioned in the proposal (expansion of the ULEZ to inner London and changes to vehicle standards for the LEZ) now having been implemented. The proposal does not provide for the further expansion of the ULEZ to outer London so that it applies London-wide.
- 2.2.8. In light of the limitations of proposal 24 and the statutory requirements referred to in 1.4.4 above which require alignment between a RUC scheme and the MTS, it is necessary to revise the MTS before the Mayor can decide whether or not to expand ULEZ to outer London.
- 2.2.9. The Proposed MTS Revision also adds new narrative to the MTS that would describe the triple challenges and set out that the key to addressing these challenges is traffic reduction. RUC schemes have been proven to be successful in reducing traffic and achieving other MTS objectives, such as emissions reductions.
- 2.2.10. RUC schemes can also support other MTS objectives, such as the target of 80 per cent sustainable mode share by 2041 and Vision Zero for road danger. They can also enable conditions that encourage Londoners to achieve the 20 minutes of active travel that is recommended for good health and wellbeing, also an aim of the MTS.
- 2.2.11. The Proposed MTS Revision would take the form of an addendum to the MTS. The existing MTS text would not be amended directly nor replaced but instead the Proposed MTS Revision would supplement it. The full Proposed MTS Revision is at Appendix A1. The draft text of new Proposal 24.1 is:
- The Mayor, through TfL and the boroughs, will seek to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion through road user charging schemes including by expanding the Ultra Low Emission Zone London-wide.*
- 2.2.12. On behalf of the Mayor, we consulted on both the Proposed MTS Revision and the proposed amendments to the ULEZ scheme rules to provide for its expansion in the one consultation (see Section 3). However, as noted earlier in this report, these are two discrete proposals which are subject to separate and subsequent Mayoral decisions. A decision to publish the Proposed MTS Revision would not in itself give effect to the London-wide expansion of the ULEZ. The revision would identify that the London-wide expansion of the ULEZ is the proposed next step in using RUC as a means of addressing the three challenges and would consolidate and update the policy foundation for RUC. Once revised, it would then be open to the Mayor to make his decision whether to proceed with the proposed ULEZ expansion.

## **2.3. Integrated Impact Assessment including Strategic Environmental Assessment (SEA)**

### ***The requirements for assessing the Proposed MTS Revision***

- 2.3.1. We commissioned consultants, Jacobs, to carry out an Integrated Impact Assessment on the Proposed MTS Revision (2022 MTS Revision IIA). It comprised the following assessments:
- Strategic Environmental Assessment (SEA)
  - Equalities Impact Assessment (EQIA)
  - Health Impact Assessment (HIA)
  - Economic and Business Impact Assessment (EBIA)
- 2.3.2. Undertaking an SEA for new or revised plans is a statutory requirement following the transposition of European Directive 2001/42/EC (the SEA Directive) into UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). The SEA Directive now forms a part of retained EU law. The MTS is a plan for the purposes of these Regulations, which also apply to any significant revision of that strategy.
- 2.3.3. The objective of an SEA as set out in the Directive is: “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.
- 2.3.4. The SEA Regulations require an environmental report to be prepared and made available to the public that identifies, describes and evaluates the likely significant effects on the environment of implementing the proposed revision to the strategy and sets out the reasonable alternatives taking into account the objectives and the geographical scope of the strategy.
- 2.3.5. As per the SEA Regulations, an assessment of the likely significant effects on the environment should be undertaken through assessing issues such as air quality, biodiversity, flora and fauna, climate change, energy use and generation, flood risk, geology and soils, heritage, health, landscape, townscape and public realm, materials and waste noise and vibration, water resources and quality.
- 2.3.6. The environmental report which is included in the IIA addresses the requirements of an SEA but also considers the social and economic aspects of sustainable development.

### ***MTS IIA and the approach to the IIA of the Proposed MTS Revision***

- 2.3.7. An IIA undertaken for the current MTS (2018 MTS IIA) was published in 2017.<sup>40</sup> This was followed by a Post Adoption Statement published in 2018<sup>41</sup> which sets out how the IIA had influenced the development of the strategy. The IIA assessment framework set out in the 2018 MTS IIA was retained for the assessment of the Proposed MTS Revision (2022 MTS Revision IIA). This means the same topics and objectives were used to ensure consistency of appraisal between the original MTS and the proposed revision and to allow for the findings of the 2022 MTS Revision IIA to be read easily alongside the findings of the 2018 MTS IIA. This approach also means that, even where negative or positive effects have been identified, the scale of these effects (in the context of the overall effects of the MTS) may not be enough to change the overall assessment.
- 2.3.8. While the 2018 MTS IIA included a Habitats Regulation Appraisal (HRA) and a Community Safety Impact Assessment, these were initially scoped out of the 2022 MTS Revision IIA owing to the scale and nature of the revision. As described further in section 2.5 below, TfL commissioned Jacobs to undertake an HRA pursuant to the Conservation of Habitats and Species Regulations 2017 in response to comments made by Natural England as part of their response to the consultation.
- 2.3.9. In developing their approach to the 2022 MTS Revision IIA, Jacobs considered the scale and scope of the proposed revision and undertook an assessment which was proportionate to them. It is important to reiterate that the assessment is limited to the proposed revision alone, which consists of one supplementary proposal and accompanying narrative. The 2018 MTS IIA remains relevant to the whole MTS as originally published, and a separate IIA was undertaken on the proposed expansion of the ULEZ (and the other proposals consulted on). The approach was set out in the Scoping Report prepared in March 2022 and which was sent to the relevant Statutory Bodies: the Environment Agency, Historic England and Natural England. The IIA which is at Appendix C includes more detail on the response of the statutory bodies to the Scoping Report.
- 2.3.10. Given the 2018 MTS IIA was undertaken in 2017, policy and baseline data have been updated and presented in the accompanying 'London-wide ULEZ and MTS amendments baseline report for Integrated Impact Assessments' (hereafter referred to as "Baseline Report").
- 2.3.11. The purpose of the 2022 MTS Revision IIA is to determine whether the findings of the 2018 MTS IIA would change as a result of the Proposed MTS

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<sup>40</sup> <https://content.tfl.gov.uk/integrated-impact-assessment-report.pdf>

<sup>41</sup> <https://content.tfl.gov.uk/integrated-impact-assessment-post-adoption-statement.pdf>

Revision (and reasonable alternatives). Two alternative options<sup>42</sup> to the Proposed MTS Revision were assessed:

- Alternative A: Modifying the ULEZ by extending it to cover the whole of Greater London and adding small clean air charge for all but the cleanest vehicles.
- Alternative B: A small, London-wide, clean air charge: a low level daily clean air charge for all but the cleanest vehicles to nudge behaviour and reduce the number of short journeys by car. This would operate in addition to the existing scope of the ULEZ scheme (central and inner London).

2.3.12. As described above, the assessment framework for the 2018 MTS IIA was re-used to assess the Proposed MTS Revision, and this meant that the same IIA objectives, guide questions and indicators were used. For each of the guide questions, the matrix indicated which of the different assessments (SEA, EqIA, HIA, HRA) was being addressed. In addition, the assessment matrix set out the findings of the 2018 MTS assessment alongside the findings for the Proposed MTS Revision, in order to aid comparison.

### ***The findings of the 2022 MTS Revision IIA***

2.3.13. There were no impacts identified across any of the IIA objectives that were significant enough at the strategic level to change the assessment score for the 2018 MTS IIA as a whole.

2.3.14. A summary of the 2022 MTS Revision IIA is given in

2.3.15. Table 6, preceded by a key to the scales used in it (Table 5).

**Table 5: Scales used in the 2022 MTS Revision IIA assessment**

Scale of effect		Definition
++	Major positive effect	Revised MTS contributes greatly towards achieving the IIA objective.
+	Minor positive effect	Revised MTS contributes to achieving the IIA objective.
0	Neutral or no effect	Revised MTS does not impact upon the achievement of the IIA objective.
-	Minor negative effect	Revised MTS conflicts with the IIA objective.
--	Major negative effect	Revised MTS greatly hinders or prevents the achievement of the IIA objective.

<sup>42</sup> These alternative options were assessed in Next Steps for Reducing Emissions from Road Transport, TfL, 2022 <https://content.tfl.gov.uk/next-steps-for-reducing-emissions-from-road-transport.pdf>

Scale of effect		Definition
?	Uncertain	Revised MTS can have positive or negative effects but the level of information available at a time of assessment does not allow to make a clear judgement.

**Table 6: Summary of 2022 MTS Revision IIA assessment**

IIA Topics	IIA Objective	Scale of effect
<b>Environment</b>		
<b>Air quality</b>	1. To reduce emissions and concentrations of harmful atmospheric pollutants, particularly in areas of poorest air quality and reduce exposure	<b>++</b> <b>Moderate to Major positive effect</b>
<b>Climate change adaptation and mitigation</b>	2. To ensure London adapts and becomes more resilient to the impacts of climate change and extreme weather events such as flood, drought and heat risks	<b>0/+</b> <b>Neutral/ Minor to Moderate positive effect</b>
	3. To help tackle climate change through reducing greenhouse gas emissions and moving towards a zero carbon London by 2050	<b>+</b> <b>Minor to Moderate positive effect</b>
<b>Energy use and supply</b>	4. To manage and reduce demand for energy, achieve greater energy efficiency, utilize new and existing energy sources effectively, and ensure a resilient smart and affordable energy system	<b>+</b> <b>Minor to Moderate positive effect</b>
<b>Flood risk</b>	5. To manage the risk of flooding from all sources and improve the resilience of people, property and infrastructure to flooding	<b>+</b> <b>Minor to Moderate positive effect</b>
<b>Geology and soils</b>	6. To conserve London's geodiversity and protect soils from development and over intensive use	<b>0</b> <b>Neutral</b>



IIA Topics	IIA Objective	Scale of effect
<b>Historic Environment</b>	7. To conserve and enhance the existing historic environment, including sites, features, landscapes and areas of historical, architectural, archaeological and cultural value in relation to their significance and their settings.	+/? <b>Minor to Moderate positive effect /Uncertain</b>
<b>Materials and waste</b>	8. To keep materials at their highest value and use for as long as possible. To significantly reduce waste generated and achieve high reuse and recycling rates	+ <b>Minor to Moderate positive effect</b>
<b>Natural Capital and Natural Environment</b>	9. To protect, connect and enhance London's natural capital (including important habitats, species and landscapes) and the services and benefits it provides, delivering a net positive outcome for biodiversity	+ <b>Minor to Moderate positive effect</b>
<b>Noise and vibration</b>	10. To minimise noise and vibration levels and disruption to people and communities across London and reduce inequalities in exposure	+/? <b>Minor to Moderate positive effect /Uncertain</b>
<b>Water resources and quality</b>	11. To protect and enhance London's water bodies by ensuring that London has a sustainable water supply, drainage and sewerage system	0 <b>Neutral</b>
<b>Economy</b>		
<b>Connectivity</b>	12. To enhance and improve connectivity for all to and from and within and around London and increase the proportion of journeys made by sustainable and active transport modes	+ <b>Minor to Moderate positive effect</b>
<b>Infrastructure</b>	13. To ensure that provision of environmental, social and physical infrastructure is managed and delivered to meet forecast population and demographic change in line with sustainable development and to support economic competitiveness	++ <b>Moderate to Major positive effect</b>

<b>IIA Topics</b>	<b>IIA Objective</b>	<b>Scale of effect</b>
<b>Economic competitiveness and employment</b>	14. To maintain and strengthen London's position as a leading, connected, knowledge based global city and to support a strong, diverse and resilient economy providing opportunities for all	<b>+</b> <b>Minor to Moderate positive effect</b>
<b>Sustainable Land Use</b>	15. Make the best and most efficient use of land so as to support sustainable patterns and forms of development	<b>++</b> <b>Moderate to Major positive effect</b>
<b>Housing Supply, Quality, Choice and Affordability</b>	16. To provide a quantum, type, quality and tenure of housing (including specialist and affordable provision) to better meet demographic change and household demand	<b>++</b> <b>Moderate to Major positive effect</b>
<b>Culture</b>	17. To safeguard and enhance the Capital's rich cultural offer, infrastructure, heritage, natural environment and talent to benefit all Londoners while delivering new activities that strengthen London's global position	<b>+/?</b> <b>Minor to Moderate positive effect /Uncertain</b>
<b>Social</b>		
<b>Accessibility</b>	18. To maximise accessibility for all in and around London	<b>+</b> <b>Minor to Moderate positive effect</b>
<b>Crime, safety and security</b>	19. To contribute to safety and security and the perceptions of safety	<b>+</b> <b>Minor to Moderate positive effect</b>
<b>Health and health Inequalities</b>	20. To improve the mental and physical health and wellbeing of Londoners and to reduce health inequalities across the City and between communities	<b>+</b> <b>Minor to Moderate positive effect</b>
<b>Equality and Inclusion</b>	21. To make London a fair and inclusive city where every person is able to participate, reducing inequality and	<b>+</b> <b>Minor to Moderate positive effect</b>

IIA Topics	IIA Objective	Scale of effect
	disadvantage and addressing the diverse needs of the population	
<b>Social integration</b>	22. To ensure London has socially integrated communities which are strong, resilient and free of prejudice	<b>+ Minor to Moderate positive effect</b>
<b>Design</b>	23. To create attractive, mixed use neighbourhoods, ensuring new buildings and spaces are appropriately designed that promote and enhance existing sense of place and distinctiveness, reducing the need to travel by motorized transport	<b>+ Minor to Moderate positive effect</b>

## 2.4. Protected characteristics and equalities

- 2.4.1. Under s149 of the Equality Act 2010 ('the Equality Act'), as public authorities, the Mayor and TfL must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not, when exercising their functions. This is known as the Public Sector Equality Duty. Protected characteristics under the Equality Act are age, disability, gender re-assignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination and other conduct prohibited under the Act only). In line with best practice, the impact on groups who also have the potential to be socially excluded, in this case, people on low incomes or from deprived communities, has also been considered notwithstanding that these specific attributes are not protected under the Equality Act but may be common to people with protected characteristics.
- 2.4.2. The Public Sector Equality Duty applies to the Mayor's decision to publish the Proposed MTS Revision.
- 2.4.3. The IIA Scoping Report (see section 2.3 above) set out the approach to assessing the potential impacts on people with protected characteristics. It referred back to the 2018 MTS IIA to shape its approach to the assessment of the Proposed MTS Revision. In the 2018 MTS IIA, the protected characteristics of marriage and civil partnership<sup>43</sup> and religion and belief were scoped out because the MTS was not considered to have a

<sup>43</sup> Marriage and civil partnership are relevant to the public sector equality duty only to the extent that it requires a public body to eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act. They are not a relevant protected characteristic for the purposes of other elements of the duty.

disproportionate impact on people with these characteristics; however, the 2018 MTS IIA considered the possible impacts of the MTS on people on low incomes as well as refugees. These approaches were also adopted in the 2022 MTS Revision IIA assessment.

- 2.4.4. In the 2022 MTS Revision IIA, specific guide questions in the assessment matrix were identified as relating to the EQIA. This enabled Jacobs to assess how the proposals could impact each of the protected characteristic groups.
- 2.4.5. This assessment is summarised below in Table 7 and the full assessment is available in the IIA (Appendix C). In producing this summary, the approach has been to identify the instances in the assessment where a protected group has been identified. For each group, the table states the topic and objective to which the assessment pertains – this leads to some repetition but mirrors the approach in the IIA. Not every topic and objective was assessed as having potential impacts for protected groups. For completeness, comments on the alternatives that were assessed are also included.
- 2.4.6. As described above, none of the impacts identified were significant enough to change the overall assessment of the 2018 MTS IIA. For completeness, all of the protected characteristics are listed below, although as stated above, there were no identified impacts for some of these groups.
- 2.4.7. One of the protected characteristic groups which was identified in the IIA as not being specifically impacted was pregnant women and mothers of new babies. On further reflection, there is the potential for such women to experience impacts relating to connectivity, social accessibility and inclusion. These impacts are described in Table 7 and the Mayor is asked to have regard to them in addition to the other findings of the IIA. The overall conclusion in the IIA as stated in paragraph 2.4.6 still stands notwithstanding that impacts relating to pregnancy and maternity have been identified outside the scope of the IIA.

**Table 7: Summary of potential impacts identified for people with protected characteristics**

<b>Protected Characteristic: Age</b>	
<b>Relevant IIA Topic: Environment – Air quality</b>	
<b>Proposed MTS Revision 2022</b>	The 2022 MTS Revision IIA found that the Proposed MTS Revision would help address the areas of NO <sub>2</sub> exceedance in outer London and may facilitate a reduction in traffic emissions beyond the Greater London boundary at certain locations. This would have a disproportionate positive impact for older people and young people who make up a larger share of the population in outer London than in inner and central London and are typically more susceptible to the health effects associated with poor air quality. Older people are more vulnerable to the impacts of air pollution because lung function declines with age and older people are more likely to have comorbidities. Children are particularly vulnerable to the effects of bad air as their lungs develop, so reducing exposure is especially important at places like schools.
<b>Alternative A</b>	Would help address the areas of NO <sub>2</sub> exceedance in both outer and inner London and would facilitate a reduction in traffic emissions beyond the Greater London boundary at certain locations. This would have a disproportionate positive impact for older people and young people who make up a larger share of the population here than in inner and central London and are more vulnerable to the impacts of air pollution because lung function declines with age and older people are more likely to have comorbidities. Children are particularly vulnerable to the effects of bad air as their lungs develop, so reducing exposure is especially important at places like schools.
<b>Alternative B</b>	While the anticipated positive impacts remain the same as for the Proposed Revision and the expansion with a tighter standard the magnitude of the impact would be less than Alternative A and the Proposed Revision
<b>Relevant IIA Topic: Social – Health and health inequalities</b>	
<b>Proposed MTS Revision 2022</b>	The assessment noted that within outer London there is a disproportionately high number of older people and young people who are typically more susceptible to health effects associated with poor air quality. The health of these groups could be expected to benefit from health benefits owing to the reduced level of air pollutants as a consequence of the proposal.

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<b>Alternative A</b>	Could result in a greater reduction in NOx emissions with an anticipated reduction of 330 to 390 tonnes NOx. This would have corresponding health benefits due to the decreased level of air pollutants. Within outer London there is a disproportionately high number of older people and young people who are typically more susceptible to health effects associated with poor air quality.
<b>Alternative B</b>	There would also be health benefits from decreased air pollutants but the scale would be lower than for the proposed revision or for Alternative A.
<b>Relevant IIA Topic: Social – Accessibility</b>	
<b>Proposed MTS Revision 2022</b>	The Proposed MTS Revision may result in disproportionate negative impacts on older people who are reliant on non-ULEZ compliant private vehicles to access leisure, health and social opportunities. The impact would be greater for Alternative A.
<b>Alternative A</b>	
<b>Alternative B</b>	No specific effects identified.
<b>Relevant IIA Topic: Social – Equality and inclusion</b>	
<b>Proposed MTS Revision 2022</b>	The assessment found that the Proposed MTS Revision would have a minor disproportionate negative impact on older people who require vehicle access to healthcare more frequently and to attend appointments in person, if they do not qualify for the ULEZ NHS reimbursement.
<b>Alternative A</b>	The implementation of this Alternative would have a minor disproportionate negative impact on older people who require vehicle access to healthcare more frequently and to attend appointments in person if they do not qualify for the ULEZ NHS reimbursement. Impacts on those who do qualify for the reimbursement would depend on the scale of the clean air charge but this is likely to be very low.

<b>Alternative B</b>	The implementation of this Alternative would have a disproportionate negative impact on older people who require access to healthcare more frequently and to attend appointments in person.
<b>Protected Characteristic: Disability</b>	
<b>Relevant IIA Topic: Economy – Connectivity</b>	
<b>Proposed MTS Revision 2022</b>	<p>The Proposed MTS Revision may have disproportionate adverse impacts on some disabled people who are reliant on non-compliant private vehicles to access employment and services and may have less capacity or opportunity to upgrade their vehicle, change to public transport or active modes of travel.</p> <p>The Proposed MTS Revision may result in disproportionate negative impacts on low income disabled people who are not eligible for disabled tax vehicle exemption but are reliant on non-compliant private vehicles to access employment and leisure opportunities in areas with low levels of accessible public transport as well as older people, and people with underlying health conditions, who require access to healthcare more frequently and to attend appointments in person.</p>
<b>Alternative A</b>	The introduction of ULEZ in outer London along with a clean air charge would have a larger disproportionate impact on disabled people who are reliant on non-compliant private vehicles to access employment and services and may have less capacity or opportunity to change to upgrade their vehicle, change to public transport or active modes of travel.
<b>Alternative B</b>	The introduction of a clean air charge in outer London would have disproportionate impacts on disabled people who are reliant on private vehicles to access employment and leisure opportunities in areas with low levels of accessible public transport.
<b>Relevant IIA Topic: Social – Accessibility</b>	
<b>Proposed MTS Revision 2022</b>	The Proposed MTS Revision may result in disproportionate negative impacts on low-income disabled people who are not eligible for the disabled tax vehicle exemption but are reliant on non-ULEZ compliant private vehicles to access employment and leisure opportunities in areas with low levels of accessible public transport, as well as

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	people with underlying health conditions, who require access to healthcare more frequently and to attend appointments in person and cannot travel by compliant ULEZ vehicles.
<b>Alternative A</b>	Likely to have a greater differential negative impact than the Proposed MTS Revision, on low-income disabled people who are reliant on private vehicles (on the assumption that it would apply to all without exemption for those holding a disabled vehicle tax) to access employment and leisure opportunities in areas with low levels of accessible public transport as well as people with underlying health conditions.
<b>Alternative B</b>	The introduction of a clean air charge in outer London would result in differential negative impacts on low-income disabled people who are reliant on private vehicles to access employment and leisure opportunities in areas with low levels of accessible public transport. The magnitude of impact would be lower than the Proposed MTS Revision and Alternative A for those without a ULEZ compliant vehicle who do not have a disabled vehicle tax licence, but greater for those that do.
<b>Relevant IIA Topic: Social – Equality and inclusion</b>	
<b>Proposed MTS Revision 2022</b>	The assessment found that the Proposed MTS Revision would have a disproportionate negative impact on disabled people, and people with underlying health conditions who require vehicle access to healthcare more frequently and to attend appointments in person, if they do not qualify for the ULEZ NHS reimbursement.
<b>Alternative A</b>	The implementation of this Alternative would have a minor disproportionate negative impact on disabled people, and people with underlying health conditions who require vehicle access to healthcare more frequently and to attend appointments in person if they do not qualify for the ULEZ NHS reimbursement. Impacts on those who do qualify for the reimbursement would depend on the scale of the clean air charge but this is likely to be very low.
<b>Alternative B</b>	The implementation of this Alternative would have a disproportionate negative impact on disabled people, and people with underlying health conditions who require access to healthcare more frequently and to attend appointments in person.
<b>Protected Characteristic: Race (including Gypsy and Traveller Communities)</b>	
<b>Relevant IIA Topic: Social – Equality and inclusion</b>	



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Proposed MTS Revision 2022	For both the Proposed MTS Revision and the two alternatives A and B, the assessment showed a potential negative impact on low income workers who rely on their own private vehicles to carry out their jobs in outer London area as a result of the additional costs (where employers do not reimburse staff for upgrading their vehicle or paying the charge). This is likely to include, for example, self-employed delivery drivers and some domiciliary carers. BAME people make up a higher percentage of the care workforce than White people and would therefore experience a disproportionate impact.
Alternative A	
Alternative B	
Protected Characteristic: Sex	
Relevant IIA Topic: Social – Equality and inclusion	
Proposed MTS Revision 2022	For both the Proposed MTS Revision and the two alternatives A and B, the assessment showed a potential negative impact on low income workers who rely on their own private vehicles to carry out their jobs in outer London area as a result of the additional costs (where employers do not reimburse staff for upgrading their vehicle or paying the charge). This is likely to include, for example, self-employed delivery drivers and some domiciliary carers. Women make up a higher percentage of the care workforce than men and would therefore experience a disproportionate impact.
Alternative A	
Alternative B	
Protected Characteristic: Gender reassignment	
Proposed MTS Revision 2022	No specific effects identified for any proposal.
Alternative A	
Alternative B	
Protected Characteristic: Sexual orientation	

Proposed MTS Revision 2022	No specific effects identified for any proposal.
Alternative A	
Alternative B	
Protected Characteristic: Pregnancy and maternity	
Proposed MTS Revision 2022	<p>The Proposed MTS Revision may have disproportionate adverse impacts on some pregnant women and new mothers who are reliant on non-compliant private vehicles to access employment and services and may have less capacity or opportunity to upgrade their vehicle, change to public transport or active modes of travel (Economy – Connectivity).</p> <p>The Proposed MTS Revision may result in disproportionate negative impacts on pregnant women and new mothers who are reliant on non-ULEZ compliant private vehicles to access employment and leisure opportunities in areas with low levels of accessible public transport, or who require access to healthcare more frequently and to attend appointments in person and cannot travel by compliant ULEZ vehicles (Social – Accessibility; Social – Equality and inclusion).</p>
Alternative A	<p>The introduction of ULEZ in outer London along with a clean air charge would have a larger disproportionate impact on pregnant women and new mothers who are reliant on non-compliant private vehicles to access employment and services and may have less capacity or opportunity to change to upgrade their vehicle, change to public transport or active modes of travel (Economy – Connectivity).</p> <p>Likely to have a greater differential negative impact than the Proposed MTS Revision, on pregnant women and new mothers who are reliant on non-compliant private vehicles to access employment and leisure opportunities in areas with low levels of accessible public transport, or who require access to healthcare more frequently and to attend appointments in person and cannot travel by compliant vehicle (Social – Accessibility; Social – Equality and inclusion).</p>
Alternative B	<p>The introduction of a clean air charge in outer London would have disproportionate impacts on pregnant women and new mothers who are reliant on private vehicles to access employment and leisure opportunities in areas with low levels of accessible public transport, or who require access to healthcare more frequently and to attend</p>

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	appointments in person and cannot travel by compliant vehicle (Economy – Connectivity; Social – Accessibility; Social – Equality and inclusion). The magnitude of impact would be lower than the Proposed MTS Revision and Alternative A.
Additional group: People on low incomes	
<b>Relevant IIA Topic: Environment – Air quality</b>	
<b>Proposed MTS Revision 2022</b>	The previous 2018 MTS IIA noted that the overall level of pollution was higher in some of the poorest communities in London. Baseline data indicates that, on average, households in outer London are comparably better off financially than those in inner London. However, there are many deprived communities in outer London that experience poor air quality which the expansion of the ULEZ would help to alleviate.
<b>Alternative A</b>	
<b>Alternative B</b>	While the anticipated positive impacts remain the same as for the Proposed Revision and the expansion with a tighter standard the magnitude of the impact would be less than Alternative A and the Proposed Revision
<b>Relevant IIA Topic: Economy – Connectivity</b>	
<b>Proposed MTS Revision 2022</b>	There is the potential for negative impacts on people on low incomes travelling by private vehicle in outer London to access employment or opportunities due to their lesser capacity to switch to a compliant vehicle and/or to change mode.
<b>Alternative A</b>	There is also the potential for greater negative impacts on people on low incomes travelling by private vehicle in outer London to access employment or opportunities due to their lesser capacity to switch to a compliant vehicle and/or to change mode. Full compliance (i.e. the avoidance of a charge) under this Alternative would require use of a ZEC vehicle.
<b>Alternative B</b>	There is also the potential for negative impacts on people on low incomes travelling by private vehicle in outer London to access employment or opportunities due to their lesser capacity to switch to a ZEC vehicle and/or to change mode.

	For those with ULEZ non-compliant vehicles the impact would be lower than Alternative A as only the low-level charge would be payable.
Relevant IIA Topic: Social – Accessibility	
Proposed MTS Revision 2022	The assessment identified the potential for negative impacts on for people on low incomes travelling by private vehicle in outer London to access employment or opportunities due to their lesser capacity to switch to a compliant vehicle and/or, depending on their location of employment or working hours, to change mode.
Alternative A	The overall scale of negative impacts would be less for the Proposed MTS Revision than Alternatives A and B as the ULEZ charge alone would be applicable to fewer people than the other charges the alternatives contemplate.  For both alternatives, there is also the potential for negative impacts on people on low incomes travelling by private vehicle in outer London to access employment or opportunities due to their lesser capacity to switch to a compliant vehicle and/or, depending on their location of employment or working hours, to change mode. For Alternative B, the magnitude of impacts on individuals is less that the Proposed MTS Revision and Alternative A for those with ULEZ non-compliant vehicles.
Alternative B	
Relevant IIA Topic: Social – Equality and inclusion	
Proposed MTS Revision 2022	For both the Proposed MTS Revision and the two alternatives, the assessment identified the potential to cause and/or exacerbate social exclusion for people who rely on private vehicles to travel in outer London. This would be less of an impact with Alternative B as the clean air charge would be set at a low level and the impacts confined to people on very low incomes, who do not have the ability to switch to public transport or active travel or bear the cost of upgrading their vehicle or pay the daily charge. This may have a differential impact on low-income disabled people.  Many people rely on private vehicle to participate in society — to access employment and opportunities, and for leisure purposes — and it may not be feasible for them to switch to public transport or active travel, or bear the cost of upgrading their vehicle.  Being excluded from society due to a lack of available transport could mean that people have fewer opportunities to access education and employment opportunities, thereby confounding their susceptibility to poverty.
Alternative A	
Alternative B	

Relevant IIA Topic: Social – Social integration	
Proposed MTS Revision 2022	For both the Proposed MTS Revision and the two alternatives, the assessment identified the potential to cause and/or exacerbate social exclusion for people who rely on private vehicles to travel in outer London. This would be less of an impact with Alternative B as the clean air charge would be set at a low level and the impacts confined to people on very low incomes, who do not have the ability to switch to public transport or active travel or bear the cost of upgrading their vehicle or pay the daily charge. This may have a differential impact on low-income disabled people.  Many people rely on private vehicle to participate in society – to access employment and opportunities, and for leisure purposes – and it may not be feasible for them to switch to public transport or active travel, or bear the cost of upgrading their vehicle.  Being excluded from society due to a lack of available transport could mean that people have fewer opportunities to access education and employment opportunities, thereby confounding their susceptibility to poverty.
Alternative A	
Alternative B	
Additional group: Refugees	
Proposed MTS Revision 2022	No specific effects identified for any proposal.
Alternative A	
Alternative B	
Other comments	
Relevant IIA Topic: Social – Social integration	
Proposed MTS Revision 2022	In line with the 2018 MTS IIA, the Proposed MTS Revision would beneficially impact communities including the vulnerable who previously were proportionally affected by severance due to busy roads acting as a barrier, however the benefits are unlikely to be significant.

	<p>For both the proposal and the two alternatives, there is potential for communities which straddle the GLA boundary to be disproportionately impacted by the proposal, as the charge could create a barrier between residents on either side of the GLA between their homes and the facilities that they regularly access</p> <p>In addition, the three proposals have the potential to cause and/or exacerbate social exclusion for people who rely on private vehicles to travel in outer London. Many people rely on private vehicle to participate in society - to access employment and opportunities, and for leisure purposes - and it may not be feasible for them to switch to public transport or active travel, bear the cost of upgrading their vehicle or pay the daily charge.</p> <p>Being excluded from society due to a lack of available transport could mean that people have fewer opportunities to access education and employment opportunities, thereby confounding their susceptibility to poverty.</p> <p>The impact of Alternative B would be to a far lesser degree on the basis that a clean air charge would be set a low level.</p>
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## **2.5. Habitats Regulation Assessment (HRA) assessment**

- 2.5.1. The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) transposed the European Union Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora into UK law to protect sites that are internationally important for threatened habitats and species, and to create a legal framework for species requiring strict protection. It remains part of domestic UK law as an element of retained EU law.
- 2.5.2. The Habitats Regulations require that a competent authority (in this case, the Mayor) considers the potential impacts of a plan or project on a European Site (a Special Area of Conservation (SAC) or Special Protection Area (SPA)) before deciding to permit or otherwise authorise the plan or project (a plan or project directly connected with or necessary to the management of such a site or which is a candidate or potential SAC/SPA are excluded).
- 2.5.3. As set out earlier in this section, a Scoping Report on the approach to the IIA was sent to the three statutory bodies (Environment Agency, Historic England and Natural England). Their responses to this scoping stage are summarised within the IIA (Appendix C). During the public and stakeholder consultation, Natural England provided a further response stating that a Habitats Regulations Assessment (HRA) is required to rule out any impacts from the proposed expansion of ULEZ on the Epping Forest SAC. The response drew attention to the potential impacts of ammonia (NH<sub>3</sub>) from traffic emissions.
- 2.5.4. Epping Forest District Council (EFDC) stated its concern about the potential impacts of the ULEZ on the Epping Forest SAC. Spelthorne Borough Council made similar comments in respect of the Staines Moor Site of Special Scientific Interest (SSSI) and the Southwest London Waterbodies Special Protection Area (SPA).
- 2.5.5. In light of these comments, TfL on behalf of the Mayor commissioned Jacobs to undertake a HRA. This process has four stages. The first stage – a screening process – is undertaken in order to determine whether to proceed to the subsequent stages, including a full assessment.
- 2.5.6. If this screening stage determines that a plan or project is unlikely to have significant effects on a European Site, the subsequent three stages are not required. The screening stage, therefore, is to determine if the Proposed MTS Revision and/or proposed ULEZ expansion are likely to have a significant environmental effect on any SACs or SPAs such that an appropriate assessment is then required.
- 2.5.7. The following sites were identified as being within scope of the assessment: the Epping Forest, Richmond Park and Wimbledon Common SACs; the Lee

Valley and South West London Waterbodies SPAs; and the Ramsar<sup>44</sup> sites at the Lee Valley and South West London Waterbodies.

- 2.5.8. The HRA report is at Appendix D. It does not identify any likely significant effects at any of the sites arising from the Proposed MTS Revision and proposed ULEZ expansion. Therefore, and in accordance with an HRA, no further assessment was undertaken.
- 2.5.9. The HRA report was sent to Natural England and will be published online.

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<sup>44</sup> A Ramsar site is a wetland site designated to be of international importance under the Ramsar Convention.



### **3. Consultation process**

#### **3.1. Introduction**

- 3.1.0. This chapter provides an overview of the consultation, including the methods used to publicise it.

#### **3.2. Consultation requirements**

- 3.2.0. Section 42 of the Greater London Authority Act 1999 provides that when revising any mayoral strategy, the Mayor must consult the following:
- the Assembly;
  - the functional bodies;
  - each London borough Council;
  - the Common Council of the City of London;
  - voluntary bodies some or all of whose activities benefit the whole or part of Greater London;
  - bodies which represent the interests of different racial, ethnic or national groups in Greater London;
  - bodies which represent the interests of different religious groups in Greater London; and
  - bodies which represent the interests of persons carrying on business in Greater London.
- 3.2.1. When revising the MTS, there is an additional requirement on the Mayor to consult the Disabled Persons Transport Advisory Committee and such other persons or bodies which represent the interests of persons with mobility problems as they consider appropriate to consult.
- 3.2.2. The consultation process was conducted in accordance with the statutory requirements. A comprehensive consultation and public and stakeholder engagement programme was devised and implemented to ensure that stakeholders and the public were provided sufficient information to facilitate meaningful and constructive feedback.

#### **3.3. Publicising the consultation**

- 3.3.1. A marketing campaign was developed to raise awareness of the consultation and encourage the public and other stakeholders to have their say. The campaign comprised an extensive email campaign, national press and digital advertising, radio advertising, social media, letter drops to local centres such as community centres and a press release issued to all relevant media. The campaign was intended to raise awareness that the consultation was taking place and describe what channels were available for potential respondents to take part.
- 3.3.2. Other than the London Gazette notice, the Proposed MTS Revision was not mentioned specifically in the advertisements and promotional material. The

aim was to promote the fact we were consulting on various aspects of the ULEZ scheme and RUC and to encourage people to visit the consultation portal. Once people arrived at the portal, they could read the Proposed MTS Revision section and provide views on that element as well as the other aspects of the consultation.

- 3.3.3. Our email campaign was designed to promote the consultation and the channels available for participating in it to a number of different audiences. In total, we sent emails to over 2.3 million recipients. Table 8 below lists the audiences we contacted, and the number of recipients of our email included within each group. Copies of the emails we sent are in Appendix E.

**Table 8 Email campaigns to raise awareness of the consultation**

Audience	No of recipients of TfL emails
<b>Members of the public</b> (comprising all those who had registered for the Ultra Low Emission Discount to the Congestion Charge or who had registered to receive emails from us.)	2,373,622
<b>Stakeholders</b> (comprising London Local Authorities, Business Improvement Districts, MPs/AMs, Health Trusts, transport operators/groups, disabled persons representative groups, charities, vehicle manufacturers, etc. A complete list of all those stakeholders we contacted is included in Appendix F.)	1,960 <sup>45</sup>

- 3.3.4. We advertised the opportunity to submit a response to us throughout the consultation period, including across a number of press titles. A copy of our press advertisement is included in Appendix E.

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<sup>45</sup> A large database of stakeholders involving over 1,900 contacts were notified of the consultation in addition to publicity activities. This included:

All 33 London local authorities with notification to: Leaders, Chief Executives, Cabinet Leads, Councillors, Transport Leads and Communications Officers

- 3.3.5. Table 9 lists the press titles which carried our advertisement, and the dates it appeared.

**Table 9 Press and digital advertising**

<b>Press titles</b>	<b>Insertion dates</b>
<b>National press</b> (Evening Standard, Metro London, The Guardian, Daily Mail, Mirror, Express and Daily Star)	w/c 23 May – Weds, Thurs and Friday w/c 4 July – Tuesday, Wednesday, Thursday, Friday
<b>Regional Press</b> Bucks Free Press, Essex County Standard, Hampshire Chronicle, Kent Messenger (Series), Milton Keynes Citizen, Oxford Mail, Reading Chronicle, Surrey Comet Group (Inc Epsom), The Argus Brighton, Watford Observer, Essex Chronicle, Hertfordshire Mercury Kent & Sussex Courier, Sevenoaks Chronicle, Surrey Advertiser, Surrey Mirror	w/c 23 May – varied between papers, but between 25 and 27 May w/c 13 June – varied between papers, but between 14 and 17 May w/c 4 July – varied between papers, but between 5 and 8 July
<b>Specialist Press</b> Business Car, Fleetworld/ Van Fleet World, Van User, MCN, What Van, What Car, Route One	Various dates throughout the consultation period

- 3.3.6. We advertised the opportunity to submit a response throughout the consultation period across a number of radio stations. The script for the advertisement is included in Appendix E. Table 10 lists the radio stations which carried our advertisement, and the dates the advertisement aired.

**Table 10: Radio channel title and dates the advertisement could be heard**

Radio Channel (25 May to 24 July)
Capital London Airtime Trading Heart Kent Trading Heart London Airtime Trading Heart Sussex Trading LBC (London) Airtime Trading Smooth Radio London Airtime Trading Heart Four Counties - Beds/Bucks/Herts Trading Heart Four Counties - Northamptonshire Trading Heart Four Counties - Milton Keynes Trading

Heart Four Counties - Bedfordshire Trading
LBC News (London) Airtime Trading
Heart Four Counties - 96.6 FM Hertfordshire Trading
Greatest Hits Radio (Bucks Beds & Herts) (was Mix 96) - Trading
106 JACKfm (Oxford) - Airtime Trading
Kiss (London) - Airtime Trading
Total Radio Essex
Magic (London) - Airtime Trading
Greatest Hits Radio (London) - Trading
Sunrise Radio London Trading

- 3.3.7. We promoted the launch of the consultation with a notice in the London Gazette on 20 May 2022.<sup>46</sup> The notice referred to both the RUC proposals and the Proposed MTS Revision. A copy is included in Appendix E.
- 3.3.8. We also used a number of digital advertising tools to promote the consultation. These were principally 'pop-up' advertisements aimed at people browsing the internet or who, through their browsing history (for example visiting travel or traffic-related websites), would have a potential interest in our consultation. The advertisements would direct anyone with an interest in our consultation to our online consultation portal. We also sponsored a number of key-word searches in Google so that a link to our consultation web-page would be returned as the first link in a search using a large number of terms which were related to our consultation.
- 3.3.9. We used paid social media advertisement on Instagram and Snapchat, which ran for the last four weeks of the consultation. A copy of the still elements of the social media stories can be found in Appendix E.
- 3.3.10. We issued a press release on 20 May 2022 to publicise the consultation. This covered local, national and international media. The announcement featured on both BBC and ITV, major radio stations such as LBC, across UK national print media and on international outlets such as Bloomberg. It was also carried in a number of trade publications. A copy of the press release is included in Appendix E.
- 3.3.11. We also posted consultation flyers, posters and covering letters to 820 locations, including community centres, leisure centres, libraries, citizens advice centres, job centres and foodbanks across outer London and 0.5 miles outside of the M25. A copy of the covering letter and flyer can be found in Appendix E.

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<sup>46</sup> The Mayor's Guidance issued in respect of TfL's exercise of road user charging functions, which TfL is required to have regard to, suggests that TfL should publish notice of the making of a road user charging order and details of any consultation in the London Gazette.

## **Stakeholder engagement**

- 3.3.12. In the days prior to the launch of the consultation, we contacted a number of stakeholders to provide them with advance notice of the consultation, as a means to ensure they would be fully informed of the opportunity to take part. A list of meetings that we held prior to the consultation can be found in Appendix F.
- 3.3.13. We contacted stakeholders again in the final week of the consultation, to remind them that the consultation would shortly be closing and to encourage them to submit a response if they had not already done so.
- 3.3.14. We offered where possible to meet with stakeholders to ensure they had opportunities to provide and discuss feedback with us. A list of these meetings is contained within Appendix F.

## **3.4. Consultation materials and channels for responding**

- 3.4.1. The consultation was conducted online using a consultation 'portal', in common with all other TfL consultations. The portal included a questionnaire that respondents could complete if they wished. Our consultation portal included the following information to help respondents to come to an informed point of view on the Proposed MTS Revision:
- Overview document of all of the proposed changes<sup>47</sup>
  - The text of the Proposed MTS Revision
  - The 2022 MTS Revision IIA
  - London-wide ULEZ and MTS revision baseline report for ULEZ Scheme IIA and 2022 MTS revision IIA
  - Consultation brochure providing a summary of proposals
  - An interactive map demonstrating the proposed new ULEZ boundary and postcode checker
  - An Easy Read version of the consultation materials and proposed changes
  - A British Sign Language video of the proposed changes
  - Audio file of the proposed changes
- 3.4.2. Members of the public and stakeholders were asked one open question (Question 14) regarding the Proposed MTS Revision: Please use this space to give us any comments about the proposed revision to the Mayor's Transport Strategy.

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<sup>47</sup> The full title of this 117-page document is: Our proposals to help improve air quality, tackle the climate emergency, and reduce congestion by expanding the ULEZ London-wide and other measures

- 3.4.3. Consultees could provide us with their response through several different channels. They could:
- Complete the online survey on our consultation portal
  - Use our Freepost address to post us the survey or letter
  - Email us with their views or a completed survey
  - Download an Easy-read version of the survey and email back to us or post it
  - Call our answerphone service where a member of the project team would call them back to either post out a survey or complete the survey over the phone
  - Upload an audio file to our email address with their views
  - Provide us a British Sign Language video of their views and email the file to us
  - Use our Textphone service
  - Provide views at any of the virtual events or, face to face meetings that took place

### **3.5. Analysing the outcomes**

- 3.5.1. AECOM were appointed to carry out the following tasks for the entire consultation:
- Thematic coding of open-ended questions;
  - Quantitative analysis of the closed questions and demographic questions; and
  - Cleaning and analysis of postcode data provided.
- 3.5.2. All free-text responses and letters and emails were grouped into themes to allow meaningful analysis. Letter and email responses were combined with the free text comments given in the questionnaire for analysis purposes. Where possible, free text responses were analysed by topic rather than response to a question to allow meaningful analysis and avoid double counting where respondents have given the same response to several questions.
- 3.5.3. The themes from each question were created by AECOM using an initial set of responses, and these were verified by TfL before full coding began. Where new themes emerged, these were verified before continuing. A minimum of ten per cent quality assurance checks and validation were completed on the coding for each question by both AECOM and TfL.

#### ***Thematic coding for the MTS***

- 3.5.4. The questionnaire included the following specific question: "Please use this space to give us any comment about the proposed revision to the Mayor's Transport Strategy". Respondents could also send us their views on the MTS revision by email.

- 3.5.5. Comments received in direct response to the question or comments provided elsewhere that referred to the MTS specifically were included in the thematic coding for the Proposed MTS Revision. Any other comments were coded and included as part of a separate report about the ULEZ and the future of RUC. AECOM's code frame is at Appendix G.

## 4. Consultation responses

### 4.1. Introduction

- 4.1.1. This chapter explains the number of responses we received, who they were from, the outcomes of the consultation, and feedback on the quality of the consultation. Further detail on the results and further additional analysis and illustrative quotes are included in the consultation analysis report by AECOM (Appendix B). We respond to the issues raised in Chapter 5.

### 4.2. About the respondents

#### *Type of respondent*

- 4.2.1. A total of 57,913 responses were received for the entire consultation, of which 342 were stakeholders. By stakeholder, we mean that the response is from an organisation or political representative rather than an individual.
- 4.2.2. Of the 57,913 respondents, 20,836 respondents (36 per cent) provided comments directed at the Proposed MTS Revision.
- 4.2.3. Respondents who commented on the Proposed MTS Revision specifically represented the respondent types shown in Table 11 (NB respondents can be represented in more than one group, therefore percentages do not add to 100).

**Table 11: Respondent types**

<b>Respondent Type</b>	<b>Count</b>
An owner of a business in the current inner London ULEZ	448
A business owner in outer London	1,123
Employed in the current inner London ULEZ	3,424
Employed in outer London	3,163
A visitor to Greater London	1,132
A London licensed taxi (black cab) driver	43
A London licensed private hire vehicle driver	32



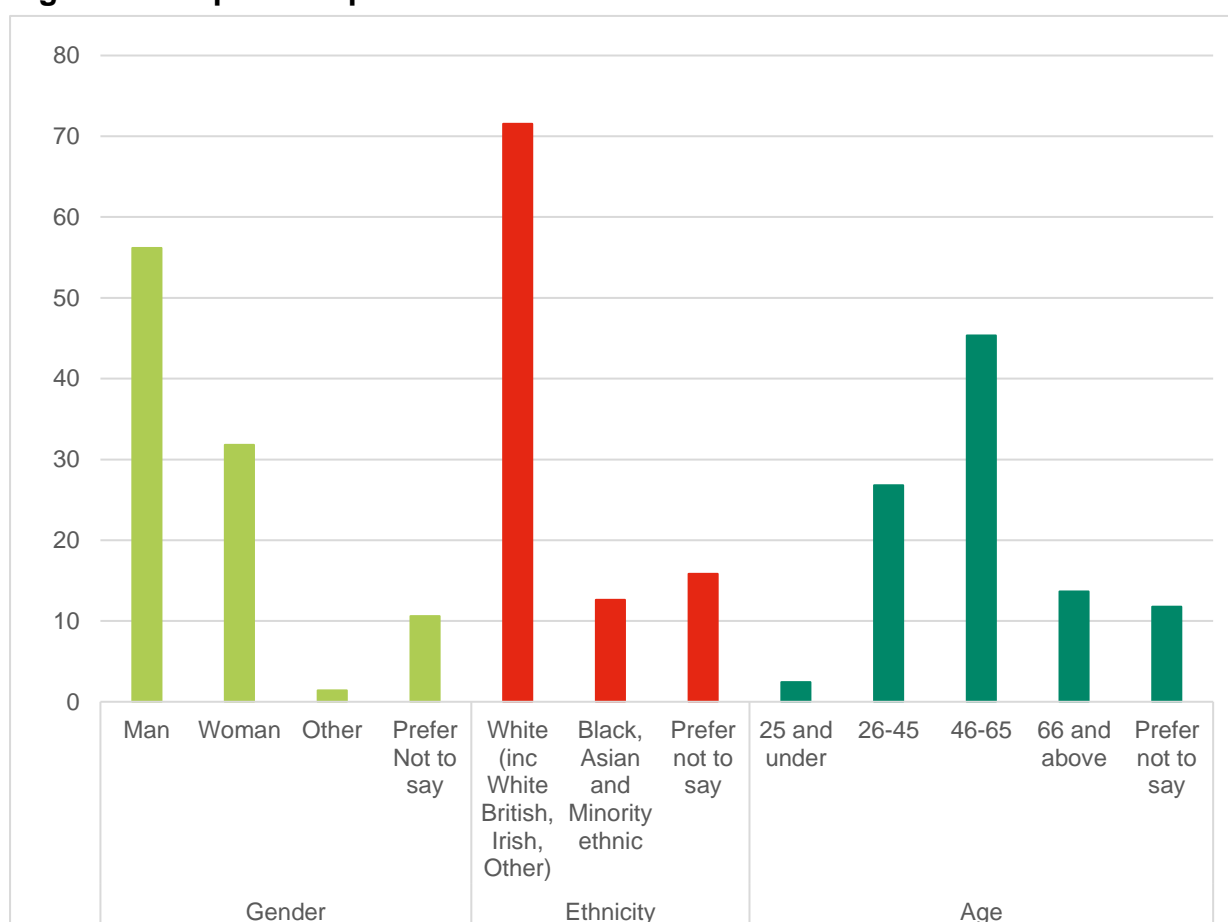
None of the above but interested in the proposals	2,694
Total	10,405

**Base: respondents who commented on the Proposed MTS Revision who provided this information**

### Respondent profile

4.2.4. Respondents provided details about themselves, such as age, gender and ethnic origin. These questions were optional. The percentages in Figure 1 represent those who commented on the Proposed MTS Revision and who provided this information. Therefore, any difference in response by demographic profile should be treated with caution.

**Figure 1: Respondent profile**



Base: all respondents who provided demographic information (Gender 9,605; Ethnicity 9,604; Age 9,660).

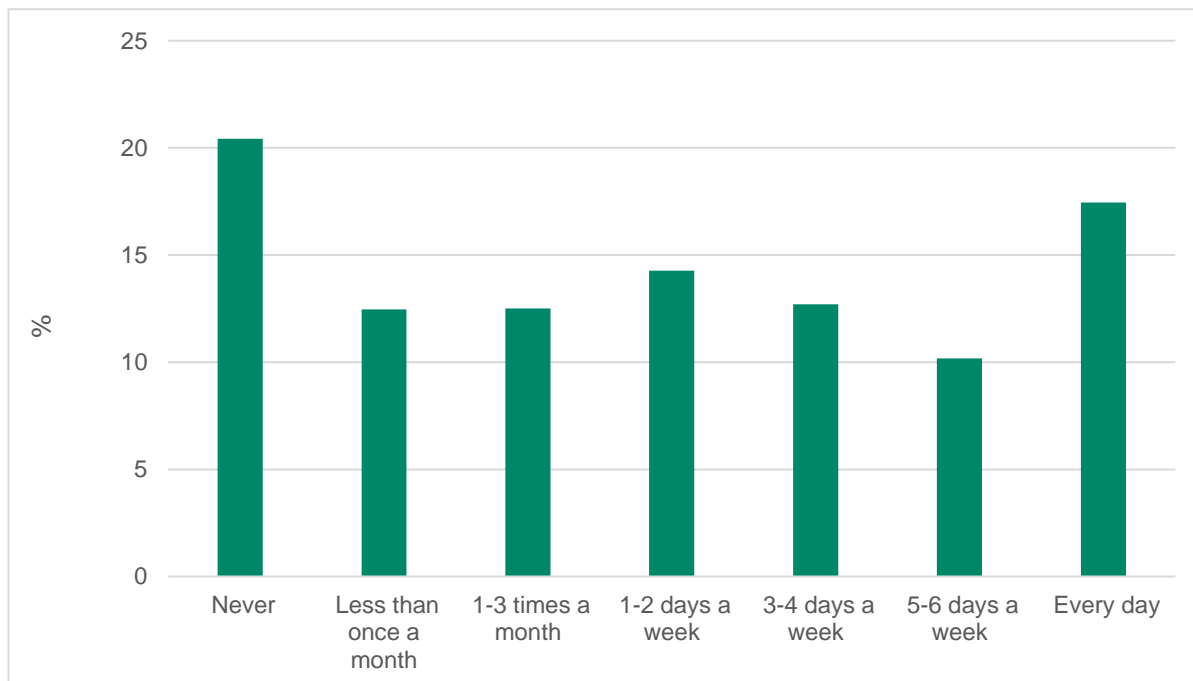
4.2.5. Other information was also gathered from respondents that could inform their opinions, including frequency of driving within Greater London. The results in Figure 2 show those who commented on the MTS and who also provided details on how often they drive in Greater London.

4.2.6. All respondents who completed the survey were asked whether their vehicles would meet the required emissions standards and a vehicle checker was provided on the consultation website for those who were unsure.

4.2.7. Figure 2: How often do you drive in Greater London? (%)

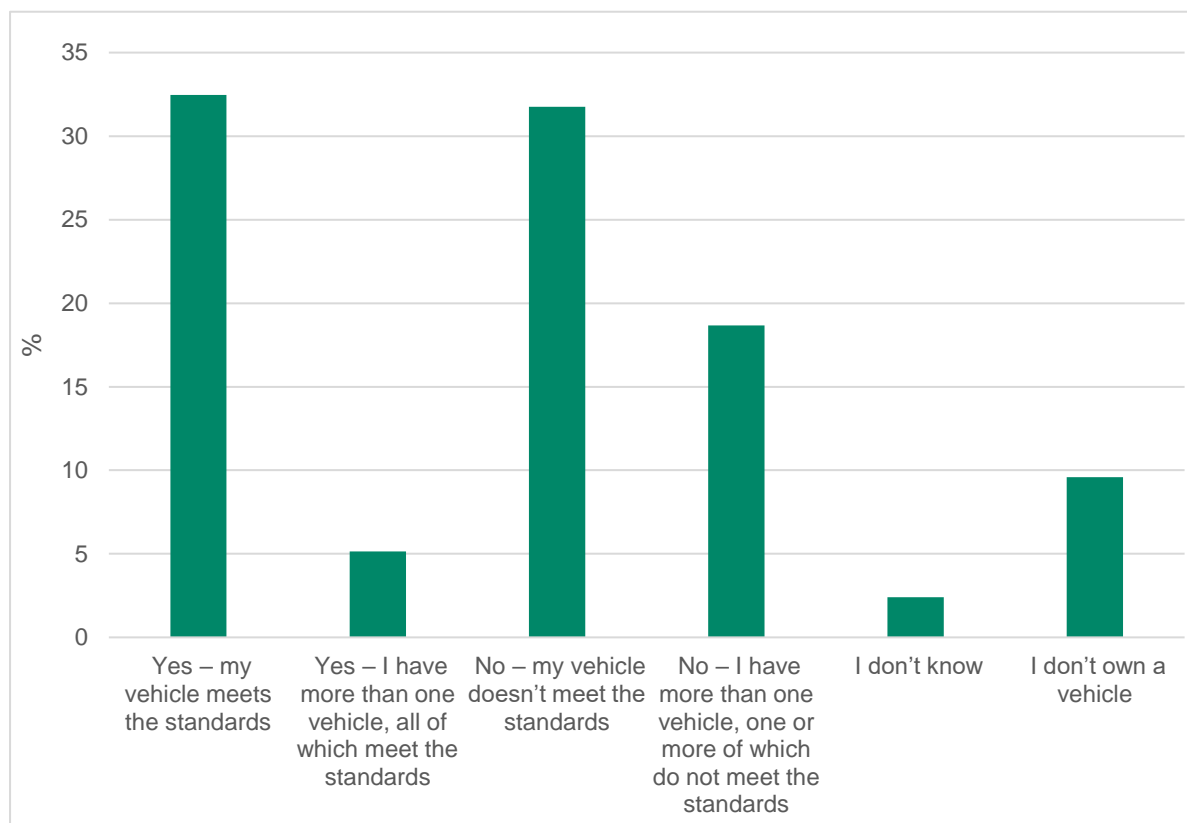
4.2.8. Figure 3 shows that 37 per cent of those who responded on the MTS owned a vehicle or vehicles that all met the emissions standards for the ULEZ, whilst 51 per cent who responded about the MTS owned at least one vehicle that did not meet the emissions standards for the ULEZ.

**Figure 2: How often do you drive in Greater London? (%)**



Base: all respondents who answered (13,742)

**Figure 3: Does your vehicle meet the emissions standards required to drive in London without paying the ULEZ charge?**



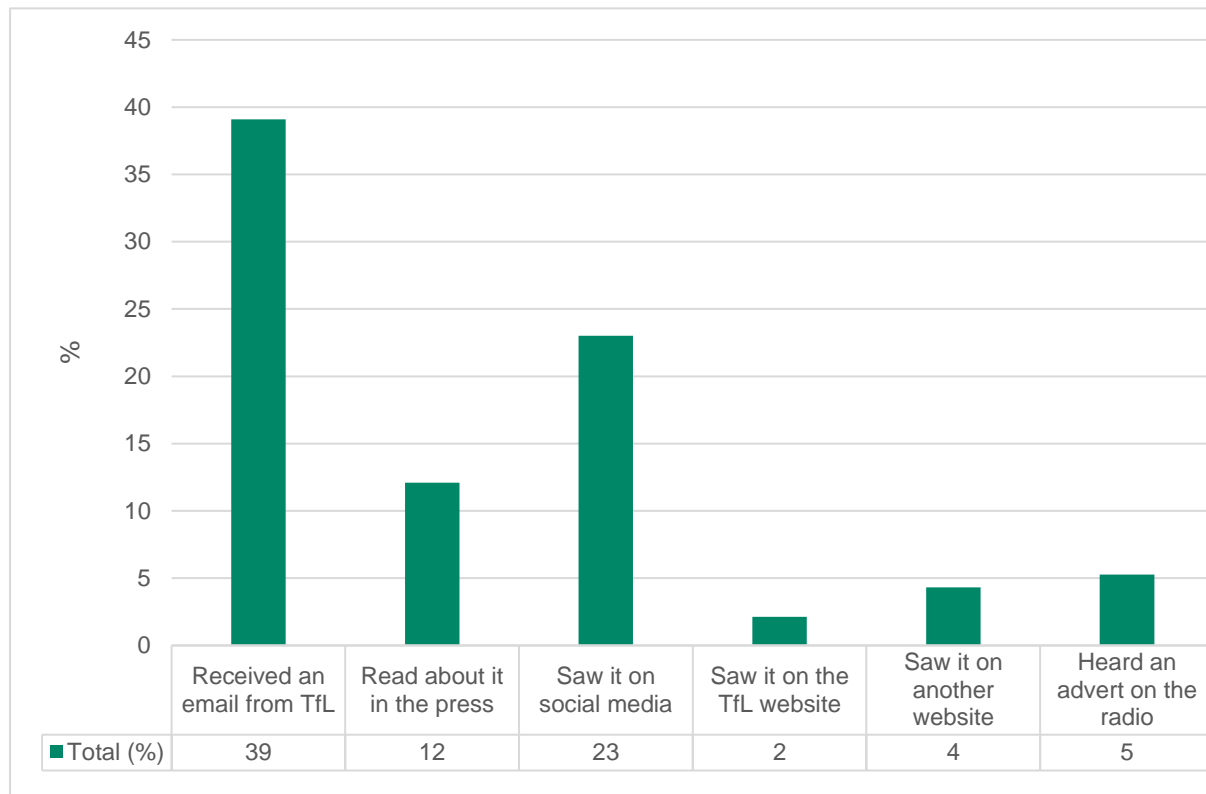
Base: all respondents who answered (10,716)

### ***How respondents heard about the consultation***

4.2.9. As part of a process to monitor and improve methods of communication to the public, we asked respondents how they heard about the consultation. Of those that responded, 39 per cent had received an email from us inviting them to take part. Results are shown in

4.2.10. Figure 4.

**Figure 4: How did you hear about this consultation (the main way you heard)? (%)**



Base: all respondents who answered (10,624)

### ***Respondent location***

4.2.11. Table 12 shows respondent residency as reported by respondents.

**Table 12: Respondent residency**

Respondent Residency	Count	Percentage
In the current inner London ULEZ	4,831	23
In outer London	9,693	47
Neither of the above	5,177	25
Don't know	1,135	5
Total	20,836	100

4.2.12. Respondents whose responses were part of organised responses (campaigns) are included in Table 11 and their respondent residency is as follows:

- 4,173 lived in the current inner London ULEZ;
- 2,687 lived in outer London; and
- 4,051 lived outside of Greater London

#### 4.3. Petitions and organised responses

##### *Petitions*

- 4.3.1. We received five petitions during the consultation period. Each of the five petitions were opposed to the proposed expansion of ULEZ. None of the petitions referenced the Proposed MTS Revision and therefore have not been included in this report.

##### *Organised responses*

- 4.3.2. We received a number of sets of organised responses to the consultation. Organised responses, or campaigns, are created by organisations that provide template responses which can be submitted by those who share their views. A number of organised responses commented on the Proposed MTS Revision:

- **Wearepossible.org:** a total of 4,312 responses were received using the response:  
“Please accept this email as my response to the consultation on proposals to extend the Ultra Low Emission Zone (ULEZ) London-wide from 29 August 2023. I agree with the proposed amendments to the Mayor’s Transport Strategy.”
- **London Friends of the Earth Network (via Action Network):** a total of 705 responses were received using the same text as Wearepossible.org:  
“Please accept this email as my response to the consultation on proposals to extend the Ultra Low Emission Zone (ULEZ) London-wide from 29 August 2023. I agree with the proposed amendments to the Mayor’s Transport Strategy.”
- **FairFuelUK:** a total of 4,726 responses were received. The response to the MTS revision was:  
“....we oppose amendments to the Mayor’s Transport Strategy to enable him to charge us for driving virtually anywhere in Greater London....”

- 4.3.3. The tables showing the numbers of responses (in Chapter 5) reflect AECOM’s report, which showed totals inclusive and exclusive of organised responses. The Mayor is asked to take in to account the inclusive totals.

#### 4.4. **Question 14: please use this space to give us any comment about the proposed revision to the Mayor’s Transport Strategy**

- 4.4.1. Question 14 of the consultation survey provided space to record any comments about the proposed revision to the MTS. The Proposed MTS Revision was described in a supporting document and the text of the Proposed MTS Revision was also provided.
- 4.4.2. Further detail on the responses to question 14 is included in Chapter 5 of this report, along with our responses to issues raised.

#### 4.5. Quality of consultation

4.5.1. We asked respondents how they rated the quality of the consultation. Results are shown in Table 13.

**Table 13: What do you think about the quality of this consultation? (%)**

<b>Component of consultation</b>	<b>Very good</b>	<b>Good</b>	<b>Adequate</b>	<b>Poor</b>	<b>Very poor</b>	<b>N/A</b>
Website structure & ease of finding what you needed	10	21	36	12	15	6
Written information	9	21	37	13	14	7
Online survey format	9	21	36	15	15	3
Website accessibility	9	25	39	9	10	8
Maps, images & related diagrams	7	16	33	13	13	17
Promotional material	4	10	28	14	17	27
Events and drop-in sessions	2	4	14	10	17	53
Base: Website 10,424, Written info 10,347, Maps 10,299, Online survey 10,368, Website accessibility 10,322, Promotional material 10,239, Events 10,223.						

## **5. Response to issues raised**

### **5.1. Introduction**

- 5.1.1. As described in Chapters 1 and 2 of this report, the consultation on the Proposed MTS Revision took place as part of a wider consultation. A single questionnaire was available for respondents to provide their comments on all proposals being consulted on (the Proposed MTS Revision, scheme related proposals including expansion of ULEZ and the future of RUC). In the section below, only comments relevant to the Proposed MTS Revision have been included. This has meant taking extracts from longer responses (by letter and email) as well as from the consultation questionnaire, in particular Question 14, which specifically invited comments on the Proposed MTS Revision.
- 5.1.2. A number of the other questions in the consultation were concerned with the ULEZ more generally, such as question 2: “Does your vehicle(s) meet the emission standards required to drive in London without paying the ULEZ charge?”. Others were concerned with how any proposed ULEZ expansion might be implemented, such as questions 7 and 8, which asked about exemptions should apply and the implementation date. The answers to these questions are not directly relevant to the Proposed MTS Revision but will be relevant to and considered as part of any subsequent decision concerning whether and how to implement an expanded ULEZ scheme.
- 5.1.3. Comments which pertain to more general issues (such as the consultation itself) are included in this report in Chapter 4, for those respondents that made comments on the Proposed MTS revision.
- 5.1.4. The remainder of this chapter describes the issues raised by the public and stakeholders concerning the Proposed MTS revision. As described in Chapter 4 above, AECOM undertook an analysis of public and stakeholder responses and assigned codes to each response to indicate the theme of the comment (a list of codes is at Appendix G). In AECOM’s analysis, any comments made in response to Question 14 were coded as responses to the Proposed MTS Revision.
- 5.1.5. In addition, TfL analysed individual stakeholder responses to identify comments made about the Proposed MTS Revision. For the themes raised by the public and stakeholders, we have given a response on a theme-by-theme basis. For stakeholders, we have provided a response to each stakeholder on all its comments concerning the Proposed MTS Revision: this encompasses comments made in response to other questions as well as Question 14. For this reason, the numbers in TfL’s analysis will not always align exactly with those in the AECOM analysis.



## 5.2. Comments on the Proposed MTS Revision

### *General comments*

- 5.2.1. As described in Chapter 3, AECOM analysed the comments made by respondents (public and stakeholders) and assigned them codes according to theme (Table 14).

**Table 14: Codes for Proposed MTS Revision**

Code no.	Code label
<b>C500</b>	Support / agree with the revisions to the MTS (general comments)
<b>C501</b>	Support / agree with the revisions to the MTS to expand the ULEZ
<b>C502</b>	Support the revision to the MTS but feel that the wording needs changing / suggestions of alternative wording
<b>C503</b>	MTS should be go further to achieve stated aims / should be more ambitious
<b>C504</b>	Oppose / disagree with the revisions to the MTS (general comments)
<b>C505</b>	Oppose / disagree with the revisions to the MTS to expand the ULEZ
<b>C506</b>	Suggest there should be a vote / referendum on MTS revisions / ULEZ expansion
<b>C507</b>	Revisions to MTS / ULEZ expansion are not justified / insufficient supporting evidence provided
<b>C508</b>	Was not aware of the MTS / its role in improvements / planning
<b>C509</b>	Other comments about the MTS revisions
<b>C530</b>	Support / agree that air quality/health and wellbeing is an important topic / needs to be improved
<b>C531</b>	Oppose / disagree that air quality/health and wellbeing is an important topic / does not need to be improved
<b>C532</b>	Support / agree that climate emergency is an important topic / environmental impact needs to be improved
<b>C533</b>	Oppose / disagree that climate emergency is an important topic / environmental does not need to be improved
<b>C534</b>	Support / agree that traffic congestion is an important topic / needs to be improved
<b>C535</b>	Oppose / disagree that traffic congestion is an important topic / does not need to be improved

- 5.2.2. Table 15 below shows the stakeholders who made comments coded to the two main codes in support of the Proposed MTS Revision; Table 16 does the same for the two main codes in opposition to it.

- 5.2.3. This is followed by the tables of detailed comments made in relation to the Proposed MTS Revision, first by stakeholders (identified by TfL), then by the public (identified by AECOM), with TfL's responses in all cases. The stakeholder comments are organised into categories (Table 17 to Table 25) and the comments are generally presented verbatim. By presenting the full extract of stakeholder comments concerning the Proposed MTS Revision

(rather than splitting these up by theme) we are able to address each stakeholder's comments in their entirety in a single response.

- 5.2.4. Comments made by the public are presented in three tables split by theme: General comments (Table 26); comments about the triple challenges (Table 27) and comments about the 2022 MTS Revision IIA (Table 28). The numbers for the count of public comments are given both with and without organised responses. The numbers of stakeholders commenting on each theme is also provided in these tables. These counts are taken from AECOM's analysis.

**Table 15: Stakeholders stating support for Proposed MTS Revision under code C500 and code C501**

	<b>C500: Support / agree with the revisions to the MTS (general comments)</b>	<b>C501: Support / agree with the revisions to the MTS to expand the ULEZ</b>
<b>Political Representatives and Organisations</b>		
Lambeth Green Party Councillors	X	
Siân Berry AM	X	
London Assembly Transport Committee	X	
<b>London Boroughs</b>		
LB Redbridge	X	
London Borough of Barnet	X	
London Borough of Waltham Forest (Leader)	X	
Westminster City Council		X
LB Lewisham		X
LB Waltham Forest		X
City of London Corporation		X
London Borough of Lambeth		X
<b>Neighbouring Authorities</b>		
Essex County Council	X	
<b>Businesses</b>		
City Clean Air Technologies	X	
Nichols Group	X	
Voi Technology	X	
Team London Bridge	X	
<b>Transport and Road User Groups</b>		

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	<b>C500: Support / agree with the revisions to the MTS (general comments)</b>	<b>C501: Support / agree with the revisions to the MTS to expand the ULEZ</b>
London Cycling Campaign	X	
Friends of Capital Transport and Campaign	X	
Haringey Cycling Campaign	X	
Brent Cycling Campaign	X	
Cycle Islington	X	
Lewisham Cyclists	X	
Campaign for Better Transport	X	
CoMo UK	X	
Bolt	X	
Uber	X	
Future Transport London		X
Hillingdon Community Transport		X
Campaign for Better Transport		X
Uber		X
<b>Health</b>		
London Association of Directors and Public Health	X	
North Central London Integrated Care System - Greener NHS Programme		X
The London Asthma Leadership and Implementation Group for Children and Young People		X
London Association of Directors and Public Health		X
Asthma and Lung UK		X
North Middlesex University Hospital		X

	<b>C500: Support / agree with the revisions to the MTS (general comments)</b>	<b>C501: Support / agree with the revisions to the MTS to expand the ULEZ</b>
<b>Community Organisations</b>		
Battersea Society	X	
Highgate Society		X
<b>Environmental Groups</b>		
Climate Emergency Camden	X	
Mums for Lungs	X	
Clean Air Fund	X	
Clean Cities Campaign	X	
Friends of the Earth London Network	X	
Hillingdon Friends of the Earth		X
ClientEarth		X
<b>TOTAL</b>	<b>28</b>	<b>17</b>

**Table 16: Stakeholders stating opposition under codes C504 and C505**

	<b>C504: Oppose / disagree with the revisions to the MTS (general comments)</b>	<b>C505: Oppose / disagree with the revisions to the MTS to expand the ULEZ</b>
<b>Political Representatives and Organisations</b>		
Dartford Labour Group		X
Shaun Bailey AM		X
Fleur Anderson MP (Putney)		X

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	<b>C504: Oppose / disagree with the revisions to the MTS (general comments)</b>	<b>C505: Oppose / disagree with the revisions to the MTS to expand the ULEZ</b>
Councillor Thomas Turrell (LB Bromley)		X
Bromley Conservative Group		X
<b>London Boroughs</b>		
London Borough of Harrow		X
<b>Businesses</b>		
Love Wimbledon Ltd (BID)		X
Purley BID	X	
<b>Charities</b>		
Cats Protection		X
Lewisham YBC		X
Watford Recycling Arts Project		X
Friends of Crayford Retired Greyhounds	X	
<b>Transport and Road User Groups</b>		
Motorcycle Action Group London		X
Medical Despatch Event Services Ltd		X
Kent Sevens	X	
<b>Community Organisations</b>		
Ruislip Residents Association		X
Northwood Residents Association		X
The St John's Area Residents' Association		X
Pepys Community Forum	X	
Queen's Park Area Residents Association	X	X
<b>Freight and Emergency Services</b>		
Emergency Services Solutions Ltd	X	

	<b>C504: Oppose / disagree with the revisions to the MTS (general comments)</b>	<b>C505: Oppose / disagree with the revisions to the MTS to expand the ULEZ</b>
<b>Other</b>		
Sutton Christian Centre		X
Save Our Rights UK	X	
<b>TOTAL</b>	<b>17</b>	<b>7</b>

5.2.5. The following tables set out the comments from stakeholders and TfL's response to them, by stakeholder group.

**Table 17: Responses from London boroughs**

<b>Stakeholder</b>	<b>Comment</b>	<b>Our response</b>
LB Barnet	<p>We note revision of the MTS to include reference to ULEZ expansion and work on assessing RUC, and welcome its recognition of the key role boroughs will have to play. However changes of this kind are of strategic importance and the very high-level suggested Proposal 24.1 does not go far enough. It should state clearly that</p> <ul style="list-style-type: none"> <li>assessment of RUC will be based on wide and meaningful engagement with all Londoners and with stakeholder groups across sectors,</li> <li>policy-making will be informed by robust evidence based on monitoring and evaluation of current and future schemes. It</li> </ul>	<p>While the MTS provides the legal framework for the Mayor's transport policies and proposals, it does not directly establish or implement any RUC schemes. The more detailed proposals for any new scheme or variation to an existing scheme are consulted on as separate proposals (subject to the Mayoral Guidance issued pursuant to the GLA Act).</p> <p>If the Mayor were to consider a new RUC scheme or variations to existing RUC schemes then similar work would need to be undertaken: engagement with stakeholders; appraisal of impacts and an evidence-based policy development. This could then lead to</p>

Stakeholder	Comment	Our response
	<p>should acknowledge, that there will be a “learn as we go” approach,</p> <ul style="list-style-type: none"> <li>• A potential RUC scheme is about a much wider range of issues and objectives than air quality, climate emergency and traffic congestion, and that revenue will be used to ensure all Londoners have a genuine choice of transport modes,</li> <li>• impacts on the least well-off and on public services must be minimised and mitigated,</li> <li>• revenue will be allocated fairly, proportionally and transparently so residents can see a clear link between what they pay and the benefit their area receives.</li> </ul>	<p>public consultation. These requirements are accepted practice and are fundamental to RUC scheme development. However, it would be premature and inappropriate to undertake this work as part of the current consultation on the Proposed MTS Revision, which – as described above – does not itself implement a new RUC scheme.</p> <p>The Proposed MTS Revision, if approved by the Mayor, provides the policy foundation and would allow for the implementation of the ULEZ London-wide but it does not of itself establish the expanded scheme. As explained previously in this report, a decision on implementation itself can only be made once the MTS has been revised as proposed.</p> <p>RUC schemes are established and operate in accordance with the statutory framework set out in the GLA Act and with general public law principles. This includes the requirement for RUC revenue to be used to facilitate the delivery of the MTS.</p> <p>In developing both the Proposed MTS Revision, and the ULEZ proposals, TfL commissioned IIAs to be undertaken by a third party. These were published as part of the consultation. These IIAs are the result of engagement (as explained within each IIA)</p>



Stakeholder	Comment	Our response
	<p>Taken with the changes in travel patterns that have resulted from the pandemic, the fundamental importance of the proposal could justify a review and refresh of the MTS, This might best be done once responses to this consultation have been considered and when TfL's longer-term funding position is clearer</p>	<p>and contain information on impacts and mitigations, including for example complementary measures and a scrappage scheme. Summaries of this information, together with other information on the proposals, are given in the IIA Overview document.</p> <p>The consultation was focused on a limited revision to the MTS to provide for a new proposal that will help London take the next steps in addressing the triple challenges and achieving the MTS' overarching aims. While it is acknowledged that there is considerable uncertainty about the future, TfL has taken steps to manage this (as described below) and it is not considered appropriate to undertake a full refresh of the MTS at this time.</p> <p>Changes in travel demand as a consequence of the pandemic, subsequent changes to working patterns and the situation with TfL's funding provide context to the transport challenges facing Greater London, however, other factors such as the impact of air quality on Londoners' health, the climate crisis and traffic congestion provide the rationale for the Proposed MTS Revision and ultimately provide the rationale</p>

Stakeholder	Comment	Our response
		<p>for the proposed ULEZ expansion. With regards to funding, on 30 August 2022, TfL reached agreement with the Government on a funding settlement until 31 March 2024.</p> <p>Prior to this agreement (which includes the period leading up to and during the consultation period) TfL has responded to uncertainty with scenario planning:</p> <ul style="list-style-type: none"> <li>- Five scenarios for London's recovery up to 2031 are set out in <a href="#">Travel in London 14</a> section 12.4. This has allowed for the development of a Hybrid Forecast to be used alongside the Reference Case. While there continues to be some uncertainty, this work allows for flexibility and will be reviewed every 6 months, with travel demand forecasts being updated annually.</li> <li>- For Financial Scenarios, see <a href="#">Annual Report and Statement of Accounts 2020/21</a></li> </ul>
City of Westminster	To support the Mayor in his proposed amendments to the Mayor's Transport Strategy (MTS). This is to enable legislation to introduce the above changes and then open up a conversation on the future means of RUC across London in the context of creating an	This support is noted.

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Stakeholder	Comment	Our response
	<p>even more cleaner environment, to encourage more of us to walk, use public transport and cycle and to return equitable funding to Transport for London (TfL) for reinvestment in our public transport network, especially the London Bus Network.</p> <p>To support the Mayor in his proposed amendments to the MTS. As a fellow local authority we understand why the Mayor is seeking public approval to be permitted to make changes to the statutory MTS that will enact the necessary powers to first consult then implement the above changes to the ULEZ and Central London Congestion Charging schemes.</p>	
LB Croydon	<p>The Mayor's Transport Strategy is clear that the ULEZ is designed to be an inner London measure. Expanding the ULEZ to outer London, where public transport links are dramatically lower and less accessible than inner London, would have a damaging impact on the mobility of primarily lower income communities in outer London boroughs who would be left without an alternative.</p> <p>TfL's ULEZ expansion consultation document explains that the Mayor's Transport Strategy needs to be revised:</p>	<p>The consultation was focused on a limited revision to the MTS to provide for a new proposal that will help London take the next steps in addressing the triple challenges and achieving the MTS' overarching aims.</p> <p>TfL's consultation on changes to bus services in central London ran from 1 June to 7 August 2022 (an extended closing date from the original date of 12 July). We are now considering the responses received and will set out next steps later this year.</p>

Stakeholder	Comment	Our response
	<ul style="list-style-type: none"> <li>so that the proposal in the Strategy to expand the ULEZ across inner London, is replaced with one to expand it across outer London; and</li> <li>to update the text to ‘ensure the triple challenges of the climate emergency, air quality and traffic congestion are addressed’.</li> </ul> <p>Currently the Transport Strategy appears broken. The Strategy pledges to reshape ‘the bus network to increase its focus on outer London, to improve bus services in outer London – right now, and continuing in the medium and longer term.’ Under ‘Managed Decline,’ TfL does not seem to be anywhere near a position to deliver this, therefore imposing policies which restrict people’s ability to move about, for example the ULEZ expansion, would be deeply unfair. There needs to be a thorough resetting of the Strategy which rebalances investment to provide equality between inner and outer London boroughs.</p> <p>The very first policy within the Transport Strategy is for 80 % of all trips in London to be made on foot, by cycle or using public transport by 2041 (described as the ‘central aim’ of the Strategy). This requires a 17% reduction in car,</p>	<p>We continue to review our bus services to ensure they reflect current and projected usage, while ensuring key links across the city are maintained. We are working with boroughs to deliver new and improved bus priority across all parts of London (including seven kilometres of new and improved bus priority in 2021/22) and have introduced over 850 electric buses to the fleet.</p> <p>On 30 August 2022, TfL reached agreement with the Government on a funding settlement until 31 March 2024. This means that the Managed Decline scenario of large-scale cuts to services – which had been a genuine possibility for some time – has been avoided. The majority of proposed bus service reductions are in inner London, within the existing ULEZ area, and the changes have been designed to protect bus services in outer London. There are no planned reductions in services that cross the London boundary.</p> <p>While there remain challenges related to the recovery of customer demand and making further efficiencies, it is not considered necessary to undertake a fuller review of the MTS at this time. TfL does not agree that there is a “proposed systematic dismantling</p>

Stakeholder	Comment	Our response
	<p>taxi etc trips by 2041. The Strategy was clear that Central London was already beyond the 80% target, Inner London almost at it, and that it is Outer London which must be the focus to get London to the 2041 target.</p> <p>The TfL consultation explains why future / wider RUC is being considered, namely:</p> <p><i>‘The recently published Element Energy report found that we will need a new kind of road user charging system by the end of the decade at the latest to achieve net zero carbon by 2030, as well as addressing air pollution and congestion.’</i></p> <p>The GLA website explains that in response, the Mayor of London has selected a preferred pathway to net zero (<i>‘the Accelerated Green pathway’</i>), a part of which is a <i>‘27 per cent reduction in car vehicle km travelled by 2030’</i>. Despite this intention the only rail improvement offered for South London in the Transport Strategy is Metroisation (an improved network providing <i>‘a London suburban metro, offering improved frequencies, journey times and interchange opportunities’</i>). There is very little prospect of this being in place by 2030 and as</p>	<p>of the transport system” nor that there is a “fundamental unpicking of the Strategy.”</p> <p>At this stage it is considered that the MTS remains fit for purpose (subject to the Proposed MTS Revision being made) and TfL is committed to achieving the objectives, including Policy 1<sup>48</sup> which is the foundation of the MTS. Should further revisions be considered necessary following our analysis of what is needed to meet the triple challenges, then further revisions will be proposed. TfL regularly provides updates on progress towards MTS objectives in both its Travel in London reports and in its annual updates to the TfL Board.<sup>49</sup></p> <p>With regard to South London metroisation, Proposal 65 of the Mayor’s Transport Strategy sets out our aspiration for the metroisation of National Rail services in South London. We are continuing to monitor post-Covid demand patterns, as we look to develop the case for this in the future.</p>

<sup>48</sup> The Mayor, through TfL and the boroughs, and working with stakeholders, will reduce Londoners’ dependency on cars in favour of active, efficient and sustainable modes of travel, with the central aim for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041.

<sup>49</sup> <https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy>

Stakeholder	Comment	Our response
	<p>such the current consultations represent a proposed systematic dismantling of the Transport Strategy.</p> <p>TfL's consultation material explains that:</p> <p><i>'The Mayor's Transport Strategy is a statutory document that sets out the Mayor's vision for transport in London. TfL, the London boroughs and other stakeholders use the Mayor's Transport Strategy to plan and provide transport in London. All transport services and planning in London must align with the Mayor's Transport Strategy.'</i></p> <p>If Policy 24 of the Strategy must be amended before the ULEZ could be further expanded, it is difficult to comprehend how the:</p> <ul style="list-style-type: none"> <li>• dramatic change to Policy 1 announced by the Mayor of London; and</li> <li>• apparent associated unpicking of the fundamentals of the Strategy</li> </ul> <p>do not necessitate a thorough review of the Strategy.</p>	
LB Enfield	The original Proposal 24 in the MTS needs to be updated as further action to address poor air	The in-principle support for the MTS Revision is noted. It is not considered

Stakeholder	Comment	Our response
	<p>quality in outer London is necessary. However, Proposal 24.1 goes beyond the need to extend the ULEZ to the whole of London, referring more generally to road user charging schemes. Whilst the concept of road user charging offers many benefits, further work and engagement with outer London (in particular) is required to ensure that London is not placed at a competitive disadvantage compared to locations beyond the London boundaries. This concern is echoed in the IIA, which states: “The assessment identifies that the Proposed MTS Revision and Alternative A would result in negative impacts on employers in outer London due to the potential loss of individuals from outside Greater London who are willing to work in outer London. Businesses that operate outside standard working hours and in locations less accessible by public transport will be the most impacted especially those in the transport and distribution sectors and a range of building support services. To address this concern Proposal 24.1 should be reworded to say something along the following lines: The Mayor, through TfL, and the boroughs, will seek to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion through road user charging schemes developed in conjunction with the boroughs, including by expanding the Ultra Low Emission Zone London-wide.</p>	<p>appropriate to make the wording change suggested because the new revised Proposal 24.1 already refers to the boroughs’ role; additionally, any future schemes would be subject to public and stakeholder consultation, including with the boroughs.</p> <p>As set out elsewhere in this report, if the Mayor approves the Proposed MTS Revision, this by itself would not implement any RUC scheme, including a London-wide expansion of ULEZ. There would be further detailed assessment of any potential new RUC scheme or variations to existing schemes, including an impacts assessment, to inform any such decision (as has been the case for the proposed ULEZ expansion consultation, which is subject to a separate Mayoral decision).</p> <p>While the 2022 MTS Revision IIA identified potential negative impacts, there were no impacts identified across the Proposed MTS Revision and the two alternatives that were considered significant enough at this strategic level to change the existing scoring on the economic objectives identified in the original 2018 MTS IIA. This assessment was minor to moderate positive effect on Economic Competitiveness and</p>

Stakeholder	Comment	Our response
		Employment (the topic that the quotation pertains to).
LB Hackney	Hackney welcomes the revision of the MTS to take account of the changes described in this scheme and are pleased that the revisions make mention of the 2022 Element Energy report on London's 2030 net zero target. The report, which highlights the need to frame London's traffic problems in the context of the triple challenge which also includes the climate emergency and traffic congestion as well as air pollution, outlines the need to reduce vehicle km travelled on London's roads by 27% by the end of the decade. While we welcome the anticipated modest traffic reduction effect of the ULEZ in Outer London where in many boroughs CO2 emissions have been rising in recent years, the current scheme has no traffic reduction effect in Inner London.	<p>The support for the Proposed MTS Revision is noted.</p> <p>As set out in the Consultation Document, significant improvements in air quality have already been achieved in central and inner London as a consequence of the ULEZ in its existing form. The current proposal focuses on outer London, where improvement has been slower. Without further action to reduce air pollution, around 550,000 Londoners will develop diseases related to poor air quality over the next 20 years, with the greatest number of deaths related to air pollution likely to be in outer London boroughs. It is however expected that central and inner London will benefit from the continuation of the ULEZ and other clean air policies.</p>
LB Harrow	Opposed to change of wording of MTS as it explicitly sanctions ULEZ expansion which is inappropriate without consultation and reflection on operation of current ULEZ and situation in 2022 onwards rather than in perspective up to 2018.	<p>While the MTS provides the framework for the Mayor's policies and proposals, it does not directly establish or implement any RUC schemes.</p> <p>This report is concerned only with the Proposed MTS Revision. A separate</p>



Stakeholder	Comment	Our response
	<p>It is however appropriate to develop strategy to recognise “The triple challenges of toxic air pollution, the climate emergency and traffic congestion” but this represents more than a change to Proposal 24. Policy 6 is concerned with achieving compliance with legal limits “London reaching compliance with UK and EU legal limits as soon as possible.” Although desirable, there is no remit to pursue the new goalposts of the more recent WHO recommended levels which are 25% of the current UK legal limits.</p> <p>Although Policy 7 does have a tighter target for PM<sub>2.5</sub>, (half of the legal limit) concentration by 2030, ULEZ expansion as proposed is assessed to produced negligible change to PM<sub>2.5</sub> concentrations in any part of London. Like NO<sub>2</sub> level these are, despite the introduction of ULEZ, are still focused on central London. So again, a new approach to ULEZ rather than expansion using ineffective daily charge controls is what would best achieve reduced concentrations.</p>	<p>decision will be made by the Mayor in respect of the proposal to expand ULEZ London-wide. (Please also see full response to LB Barnet above.)</p> <p>With regard to the need to change other parts of the MTS, specifically Policy 6,<sup>50</sup> this is not considered necessary at this time and in the context of the need to take action to address the triple challenges and allow for a London-wide expansion of ULEZ.</p> <p>Achieving UK and EU air pollutant legal limits remains an important part of the MTS. However TfL and the Mayor may seek to improve air quality beyond the minimum that is legally required (the Mayor’s Environment and Health Inequalities strategies are relevant as well in this respect). TfL and the Mayor may also take into account more recent developments – such as the updated WHO guidelines and new evidence on the impacts of poor air quality on Londoners’ health – when considering revisions to the MTS in order to allow for appropriate</p>

<sup>50</sup> The Mayor, through TfL and the boroughs, and working with stakeholders, will take action to reduce emissions – in particular diesel emissions– from vehicles on London’s streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures may include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/levies, responsible procurement, the making of traffic restrictions/regulations and local actions.

Stakeholder	Comment	Our response
	It would appear legally questionable whether just changing Proposal 24 in isolation is acceptable without reviewing the overall approach and consulting upon the overarching policy (especially Policy 6).	interventions. The Proposed MTS Revision would become an addendum to the MTS and supplements the commitment in Policy 6. The narrative of the Proposed MTS Revision refers specifically to RUC schemes including ULEZ expansion as a means to ‘potentially going beyond achieving existing UK air quality requirements’. This aim is not incompatible with the aims in Policy 6 or with the overarching aims of the MTS as a whole. The narrative also acknowledges that RUC schemes can support wider MTS objectives – such as 80 per cent sustainable mode share and Vision Zero – demonstrating that the proposal is in alignment with the MTS more broadly.
LB Havering	Should the Mayor decide to implement expanding the ULEZ it is recognised that this policy change will need to be reflected in the Mayor’s Transport Strategy. Havering would like to see the revised policy wording for Policy 24 contain a clear commitment to reinvesting revenue from the scheme in outer London transport infrastructure.	The GLA Act provides that net revenue raised by a RUC scheme must be used to facilitate the delivery of the MTS. Typically, RUC revenue is reinvested into our transport services, including in outer London.
LB Hammersmith & Fulham	The Council supports the overarching principle that the Mayor’s Transport Strategy (MTS) should be revised. The triple challenges of reducing transport emissions to protect the health of Londoners, achieving net zero carbon emissions by 2030 and cutting congestion are	This support is noted. The Proposed MTS Revision would supplement and align with the policies, proposals and objectives which are already set out in the MTS and which address a range of issues including equality and accessibility.

Stakeholder	Comment	Our response
	<p>important objectives within the MTS. Reducing traffic is key to addressing each element and the Council agrees that, when properly designed and implemented, road user charging schemes have proven to be successful in doing so and will need to be part of the solution.</p> <p>However, the Council notes that (as currently drafted) the new Proposal 24.1 will only “seek to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion”. Whilst these are of course important issues, the Council further notes that:</p> <ul style="list-style-type: none"> <li>• The proposed supporting text to the new Proposal acknowledges that “Road user charging schemes can also support other MTS objectives”.</li> <li>• Chapter 4 of the explanatory paper supporting the consultation (‘Our proposals to help improve air quality, tackle the climate emergency, and reduce congestion by expanding the ULEZ London-wide and other measures’ at page 26 - indicates that the underlying intention is to “help London take the next steps in addressing the triple challenges and achieving the MTS’ overarching aims”.`</li> <li>• Pages 35 to 39 of that document specifically highlight the differential impact of poor air quality</li> </ul>	<p>The Proposed MTS Revision would enable an expansion of ULEZ, which would support the Mayor’s objective to reduce harmful air pollution from road transport.</p> <p>In addition, the Proposed MTS Revision would be an Addendum to the existing MTS and so the policies and proposals - including those addressing accessibility and equality – would remain. These include for example Policy 12 (affordable fares) and Policy 14 (more spontaneous travel and reduced time differential for disabled and older people) and associated proposals. For this reason it is not considered necessary to make further changes to the MTS at this time; equality and accessibility are fundamental to the MTS and this will remain the case if the MTS is revised.</p> <p>The MTS outlines the Mayor’s vision for transport in London, and sets out the policies and proposals that will contribute to achieving it. The overarching aim of the MTS is to reduce Londoners’ dependency on cars and to increase the active, efficient and sustainable (walking, cycling and public transport) mode share of trips in London to 80 per cent by 2041. Improving public transport’s accessibility and inclusivity is key to the MTS and we work hard to deliver an equitable, accessible and inclusive system</p>

Stakeholder	Comment	Our response
	<p>on communities with higher levels of deprivation, or higher proportions of people from ethnic backgrounds.</p> <p>In this regard, air quality touches upon the MTS objectives not only in its own right, but also in terms of advancing other MTS objectives which seek to promote and achieve greater equality and accessibility for all. Whilst it is important to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion, these do not – and should not - fully encapsulate the wider underlying rationale behind the new Proposal as set out in both the draft supporting text and the supporting consultation documents. Nor does the Proposal as drafted fully reflect the potential opportunities for road user charging schemes (including expansion of the Ultra-Low Emission Zone London-wide) to support other MTS objectives and achieve the MTS’ overarching aims.</p> <p>In summary, road user charging schemes can help to deliver other MTS objectives and secure a sustainable future for all Londoners. Consequently, the Council proposes that the Proposal be amended to more fully encapsulate the broader role that such schemes –</p>	<p>that is affordable and works for everyone. For example, we added eight step-free stations to the TfL network in 2021/22, meaning that 33 per cent of this network is now step-free<sup>51</sup>. The Elizabeth line, which opened in May 2022, provides further step-free access.</p> <p>Improving the accessibility of London’s extensive public transport services helps to support and enhance the quality of life of Londoners. Our key accessibility ambition is to reduce the differential in journey time for disabled people by 50 per cent by 2041.</p>

<sup>51</sup> For London Overground, 55%, for TfL Rail 97%, DLR and Tram stops it is 100%. From Delivering the MTS 2021/22: <https://content.tfl.gov.uk/tfl-mts-update-14-july-2022-acc.pdf>

Stakeholder	Comment	Our response
	appropriately designed and implemented can play.	
LB Islington	The council would like to highlight that the Mayor's proposal does not include any suggestions for how the Central London Zero Emission Zone will be progressed from 2025 as set out in the Mayor's Transport Strategy. The council calls upon the Mayor of London to make the ULEZ a Zero Emission Zone by 2030	<p>Proposal 35<sup>52</sup> in the MTS states the aim for a Zero Emission Zone (ZEZ) in central London by 2025. This could be delivered by boroughs or by TfL; small ZEZs have already been implemented. TfL has prepared guidance<sup>53</sup> to London boroughs on the local implementation of ZEZs.</p> <p>As well as the Proposed MTS Revision the consultation sought views on the future of RUC in London and this feedback will also be considered in that context.</p>
LB Richmond upon Thames	<p>The above wording [of the MTS Revision] unnecessarily conflates</p> <ul style="list-style-type: none"> <li>• air pollution, the climate emergency and traffic congestion</li> <li>• road user charging schemes and the Ultra Low Emission Zone</li> <li>• TfL and the boroughs</li> </ul>	The proposed amendment to Proposal 24 would explicitly refer to the London boroughs (which the current Proposal 24 does not). If the ULEZ is expanded, TfL would implement it (subject to a separate Mayoral decision on a proposed scheme). However it is considered that it is important to provide for a role for the London

<sup>52</sup> The Mayor, through TfL and the boroughs, and working with Government, will seek to implement zero emission zones in town centres from 2020 and aim to deliver a zero emission zone in central London from 2025, as well as broader congestion reduction measures to facilitate the implementation of larger zero emission zones in inner London by 2040 and London-wide by 2050 at the latest.

<sup>53</sup> <https://tfl.gov.uk/info-for/boroughs-and-communities/zero-emission-zones>

Stakeholder	Comment	Our response
	<p>The wording implies the Boroughs having equivalence in the development of charging schemes with TfL which has not been the case to date and does not appear to be the intention going forward. There is nothing in the documentation to suggest that Boroughs would have a real say in how a scheme would be developed and applied and how revenue would be spent. The wording also implies that TfL sees the Ultra Low Emission Zone as a road user charging scheme. This is confusing. ULEZ has not previously been promoted as a road user charging scheme in such a way and, indeed, in central London both road user charging and ULEZ co-exist. The documentation provided is intended to include the evidence base for extending ULEZ not for introducing a London-wide congestion charge. Section 7 of TfL's proposals document provides only the scantest evidence of a need for a congestion charge with little to no consideration of alternatives. On page 83, the documentation says "...further action will be required....This may require the introduction of London-wide road user charging by 2030 at the latest...."</p>	<p>boroughs in the future implementation of RUC schemes. This could take a range of forms including shaping policy, infrastructure installation and local transport planning to support schemes.</p> <p>In addition, Proposal 23<sup>54</sup> of the MTS sets out that boroughs can implement RUC or WPL schemes, reflecting the powers set out in the GLA Act Schedule 23.</p> <p>The Congestion Charging scheme, the LEZ and ULEZ are all implemented using RUC powers and are, in this respect, all RUC schemes. Although the majority of vehicles are not subject to ULEZ charges because they comply with the emissions standards (as is the case for LEZ), ULEZ is nevertheless a road user charge.</p> <p>With regard to a potential deletion, the purpose of the Proposed MTS Revision is to allow for an expansion of ULEZ. It does not by itself implement that expansion, which is the subject of a separate decision, as described earlier in this report. This has been consulted on alongside this Proposed MTS Revision. It is also important to provide for a situation where either the ULEZ</p>

<sup>54</sup> The Mayor, through TfL, will work with those boroughs who wish to develop and implement appropriate traffic demand management measures, for example local (TfL or borough) road user charging or workplace parking levy schemes, as part of traffic reduction strategies where they are consistent with the policies and proposals set out in this strategy.

Stakeholder	Comment	Our response
	<p>Something that may be required cannot then have a target date at the latest. The prospect of a London-wide congestion charge should be subject to proper scrutiny and not attached to ULEZ. Previous amendments to the Mayor of London's Transport Strategy have focussed on the matter in hand which should remain the case here. We would suggest deleting the words "through road user charging schemes including" from the proposal and, if need be, TfL should develop a separate evidence based proposal for road user charging.</p>	<p>expansion is implemented as consulted on, or with modifications, or not at all. Additionally, it is important to provide for other RUC schemes that could be deployed in order to address the triple challenges. At the same time, if a new scheme other than the London-wide ULEZ were to be proposed, there would need to be further consultation on specific scheme proposals and potentially a further revision to the MTS to provide for the precise scheme.</p>
LB Lewisham	<p>LBL general agree with the proposed changes to the Mayor's Transport Strategy, however do not consider that this change should result in the boroughs having to update their Local Implementation Plans.</p>	<p>We note the general support. All boroughs have approved LIPs which remain relevant in the event of ULEZ being further expanded. Due to the nature of the change to the MTS and that TfL would implement the next step (ULEZ expansion) subject to the Mayor's decision we do not think it will be necessary for boroughs to amend their LIPs as a consequence of this revision.</p>
LB Southwark	<p>We consider that within the proposed revision of proposal 24 of the Mayors Transport Strategy this should include a reference "to reducing vehicle kilometres", within the revision</p>	<p>Reducing vehicle kilometres is already part of the MTS and is reflected in the Proposed MTS Revision.</p> <p>This is set out in the draft Addendum. The narrative immediately preceding Proposal 24.1 acknowledges that "...reducing traffic is</p>

Stakeholder	Comment	Our response
	<p>Proposal 24.1</p> <p>The Mayor, through TfL and the boroughs, will seek to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion and reducing vehicle kilometres through road user charging schemes including by expanding the Ultra-Low Emission Zone London-wide.</p> <p>...</p> <p>In Appendix A – Feedback from statutory bodies on the proposed MTS amendment. TfL would</p>	<p>key to addressing each element [of the three challenges]..” Additionally, in the section of the narrative concerned with the climate emergency, there is text referring to the Element Energy report and the need to take action to reduce car vehicle km travelled on London’s roads by 27 per cent by 2030.</p> <p>It is also set out in the MTS, for example in the section “Reducing car use” (pages 88-89). Policy 5 (page 74) sets the aim of reducing overall traffic levels by 10-15 per cent by 2041.</p> <p>It is therefore considered that the need to reduce vehicle kilometres is sufficiently covered in the draft and no change to Proposal 24.1 is needed.</p> <p>The feedback from the Environment Agency was also used to inform the London-wide ULEZ IIA and the impact of the proposed scheme was assessed against the objective to promote sustainable resource use and waste management. The London-wide ULEZ IIA concluded that given the high proportion of ULEZ compliant vehicles, and</p>



Stakeholder	Comment	Our response
	<p>have appeared to have misunderstood the comment from the Environment Agency in connection with an increase in fly tipping of rubbish, which will be an extra burden to local authorities to clear up the material. Ideally, TfL need to reconsider their response to the EA comment.</p>	<p>the number of owners of non-compliant vehicles who would willingly break the law by fly tipping, the likely impact was considered to be neutral in the wider outer London context.</p> <p>Environment Agency comments are considered in Table 25 below</p>
LB Waltham Forest	<p>Waltham Forest confirms its support for Proposed revision of the Mayor's Transport Strategy (MTS) to enable an expansion of the Ultra-Low Emission Zone.</p> <p>The Council has taken significant steps to try to reduce pollution in the borough, notably through our Enjoy Waltham Forest Programme, which has sought to encourage more active travel, particularly walking and cycling by reducing the access of residential neighbourhoods by non-local through traffic and supporting a range of other infrastructure and behavioural complimentary measures, the culmination of which have lead to the second largest decrease in car ownership for an outer London borough. However, further work needs to be done including taking action to reduce vehicle kilometres travelled on London's roads by the Mayor's 27 per cent by 2030 target.</p>	<p>This support is noted.</p>

Stakeholder	Comment	Our response
	In principle Waltham Forest supports Road user charging schemes as they can also support other MTS objectives, such as the target of 80 per cent sustainable mode share by 2041 and Vision Zero for road danger. They can also help Londoners to achieve the 20 minutes of active travel that is recommended for good health and wellbeing	
LB Wandsworth	Turning to the proposed amendment to the Mayor of London's Transport Strategy, we would support the Mayor having separate policies for ULEZ and for congestion charging – as they serve different purposes.	<p>The proposed revision to Proposal 24 of the MTS would provide for the role of RUC in addressing the triple challenges of toxic air pollution, the climate emergency and traffic congestion, including as a next step, the proposed London-wide expansion of ULEZ.</p> <p>No changes are proposed to Proposal 20<sup>55</sup> and the ULEZ and Congestion Charging scheme would continue to operate as separate schemes regardless of whether this proposed amendment is implemented.</p> <p>If in future the Mayor wished to consider replacing these schemes with a single RUC</p>

<sup>55</sup> The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.

Report to Mayor (MTS revision consultation)

Stakeholder	Comment	Our response
		scheme, there would need to be further consultation on MTS changes (for example to Proposal 21) and on a specific scheme. Please also see response to LB Richmond upon Thames.
Councillor Thomas Turrell (LB Bromley)	Due to my opposition to the proposed extension, I am opposed to the change in strategy. Looking at the questions in the consultation questionnaire online this is the closest question to asking if participants are support or opposed to expanding the ULEZ. I think this question should have been clearer for the benefit of participants.	Opposition to the expansion of ULEZ, and to the associated Proposed MTS Revision, is noted.  The questionnaire included spaces to comment both on the Proposed MTS Revision and on the proposed scheme.
Bromley Conservative Group	We are opposed to the change in strategy. Looking at the questions in the consultation questionnaire online this is the closest question to asking if participants are in support or opposed to expanding the ULEZ. We think this question should have been clearer for the benefit of participants.	Opposition to the expansion of ULEZ, and to the associated Proposed MTS Revision, is noted.  The questionnaire included spaces to comment both on the Proposed MTS Revision and on the proposed scheme.
Lambeth Green Party Councillors	The councillors support the revisions to the Mayor's Transport Strategy, as the changes provide further clarity and purpose for the future development of clean air and traffic reduction policies. In addition, they ask that 'road danger	This support is noted and the comments on the objectives of future road user charging are noted.

Stakeholder	Comment	Our response
	reduction' is added to the wording of the new proposal as a potential goal of these policies.	

**Table 18: Responses from the London Assembly**

Stakeholder	Comment	Our response
London Assembly Transport Committee	<p>The Committee held an evidence session about the proposals on 12 July 2022.</p> <p>...</p> <p>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.</p> <p>...</p> <p>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</p>	<p>With regard to the first point, another strand of the consultation focuses on a potential future integrated RUC scheme (as set out in Proposal 21 of the MTS – see Chapter 2), and this will be reported on separately.</p> <p>The Proposed MTS Revision would enable an expansion of ULEZ, which would help to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion. The narrative preceding Proposal 24.1 (“Addressing the triple challenges”) states that reducing traffic, by means of road user charging schemes, can support MTS objectives such as Vision Zero for road danger. Earlier in the Addendum the rationale for implementing RUC schemes such as London-wide expansion of ULEZ as a means to address toxic air pollution is set out in some detail.</p>

Stakeholder	Comment	Our response
	<p>that road charging schemes might tackle, but omits the issue of road danger. The director of Transport Strategy &amp; Policy at TfL 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.</p>	<p>In addition, the Proposed MTS Revision would be an Addendum to the MTS and so the policies and proposals – including those addressing road danger reduction and clean air – would remain. These include for example Policy 3 (all deaths and serious injuries to be eliminated from London’s roads by 2041) and Policy 6 and Policy 7 (reducing air pollutant and carbon emissions on streets). For these reasons it is not considered necessary to make further changes to the proposed revision: clean air and Vision Zero are fundamental to the MTS and this will remain the case with the revision. As noted in the session, Proposal 21 on exploring the next generation of road user charging includes reference to ‘road danger reduction’ as an objective.</p>
Siân Berry AM	<p>I support the revisions to the Mayor’s Transport Strategy (MTS), as they provide more clarity and purpose for the future development of clean air and traffic reduction policies. I do, however, request that ‘road danger reduction’ is added to the wording of the new proposal as a potential goal of these new policies.</p>	<p>Please see response above.</p>

Stakeholder	Comment	Our response
Shaun Bailey AM	As the ULEZ should not be expanded and as road user charging should not happen on a London-only basis, there should be no need to revise the Mayor's Transport Strategy.	The opposition to the proposed ULEZ expansion and Proposed MTS Revision is noted.

**Table 19: Responses from local authorities outside London**

Stakeholder	Comment	Our response
Epping Forest DC	EFDC did not make explicit comments with regard to the MTS Revision. However, as explained in section 2.5 , it stated its concern about the environmental impacts on Epping Forest SAC, specifically in regard to air quality and ammonia emissions.	TfL commissioned Jacobs to undertake a habitats assessment (as described in section 2.5). This assessment found that there were no likely significant effects at any of the sites identified, including Epping Forest SAC.  The full HRA Report is at Appendix D.
Essex County Council	TfL should note comments made by ECC during consultation on the MTS (2018), summarised below:  Any proposals to amend or extend road user charging	The Proposed MTS Revision, if approved by the Mayor, would ensure that there is conformity between the MTS and the proposed London-wide ULEZ scheme but it does not of itself confirm that scheme, which would be subject to a separate Mayoral decision. The detail of the scheme – including traffic impacts – would be addressed in that decision. Any future RUC

Stakeholder	Comment	Our response
	<p>within London should be evidence based and subject to widespread consultation to ensure that the proposals are effective and are widely accepted. In particular the impact of proposed charges on the transport networks beyond London should be considered and neighbouring transport authorities engaged during the planning and development process. For example changes to Silvertown Tunnel tolls would need to be considered alongside Dartford Crossing and Lower Thames Crossing tolls (and any other crossings proposed in east London) to ensure that significant re-routing of traffic does not occur. Essex is also concerned that policies contained within the MTS do not have unintended consequences; for example, the impacts of charging on driver behaviour</p>	<p>schemes which are developed would also be subject to separate consultation, impact assessment and decision.</p>

Stakeholder	Comment	Our response
	and the concern that parts of Essex may become a car park for commuters seeking to avoid charges.	
Spelthorne Borough Council	There are sensitivities at these locations, namely the proximity of Sites of Special Scientific Interest (Staines Moor) and the Southwest London Waterbodies Special Protection Area to Staines upon Thames, along with the already high levels of pollution at Sunbury Cross. Given the significance of the Local Plan setting of the Council's approach to meeting development needs over the next 15 years and, the requirement to mitigate any impacts of this as far as possible, it is a concern that there has been a lack of consultation with the Borough	<p>TfL commissioned Jacobs to undertake a habitats assessment (as described in section 2.5 above).</p> <p>This assessment found that there are no likely significant effects arising from the Proposed MTS Revision at any of the sites identified, including the SPA and Ramsar sites at the SW London Waterbodies.</p> <p>The full HRA Report is at Appendix D.</p> <p>With regard to Staines Moor, sites of special scientific interest such as this were included within the London-wide ULEZ IIA (which remains available online on the consultation website <a href="https://haveyoursay.tfl.gov.uk/cleanair/widgets/44946/documents">https://haveyoursay.tfl.gov.uk/cleanair/widgets/44946/documents</a>).</p> <p>The IIA concluded that the proposed scheme would have a negligible positive impact on habitats sensitive to nitrogen deposition within the assessment area (this includes Staines Moor).</p>



Stakeholder	Comment	Our response
	<p>This is particularly concerning given the sensitive sites and the potential impacts of increased traffic flows on these, that there has been such limited, or no, clear consultation with Natural England and National Highways. The Council is developing its Habitats Regulation Assessment to support the Local Plan in conjunction with Natural England to ensure any identified air quality impacts on sensitive sites are fully scoped and mitigated where possible. If external factors are likely to influence this work, such as changing and increased traffic flows because of the ULEZ, then TfL should be liaising with NE and the Council to share modelling and to ensure there is a fully considered assessment and mitigation strategy in place.</p>	

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Stakeholder	Comment	Our response

**Table 20: Responses from Health organisations**

Stakeholder	Comment	Our response
Asthma + Lung UK	Asthma + Lung UK welcomes the proposed revision of the Mayor's Transport Strategy (MTS) which would allow for the expansion of the ULEZ to Greater London and to deliver its triple goals to target air pollution, the climate emergency and road congestion. We would like to see the Mayor's strategy delivered at pace and with sufficient investment in public transport and active travel measures to ensure rapid improvements in air quality alongside the 27% of car journey reductions needed to reach net zero by 2030.	The support is noted.

**Table 21: Responses from Campaign groups**

Stakeholder	Comment	Our response
Campaign for Better Transport	<p>Campaign for Better Transport fully supports the amendments to the MTS to outline the triple challenges and the proposal to expand the ULEZ to the whole of London.</p> <p>However, in addition, we believe that the Mayor should progress the existing commitments outlined in London's Transport and Environment strategies to a central London Zero Emission Zone by 2025. Despite the progress made by the current ULEZ, central London still suffers from harmful air pollution. To give people enough time to prepare, the Mayor should consult on a Zero Emission Zone for central London by summer 2023.</p>	<p>This support is noted. As set out in the Consultation Overview Document, significant improvements in air quality have already been achieved in central and inner London as a consequence of the ULEZ in its existing form. The current proposal focuses on outer London, where improvement has been slower. It is however expected that central and inner London will benefit from the continuation of ULEZ and other clean air policies.</p> <p>Proposal 35<sup>56</sup> in the MTS states the aim for to introduce a ZEZ in central London by 2025. This could be delivered by boroughs or by TfL; small ZEZs have already been implemented. TfL has prepared guidance<sup>57</sup> to London boroughs on the local implementation of ZEZs.</p>
ClientEarth	We agree with the Mayor's concern with regards to tackling the triple challenges of air pollution, climate	<p>The support is noted.</p> <p>The MTS sets out (Proposal 35) that we will seek to implement ZEZs in town centres</p>

<sup>56</sup> The Mayor, through TfL and the boroughs, and working with Government, will seek to implement zero emission zones in town centres from 2020 and aim to deliver a zero emission zone in central London from 2025, as well as broader congestion reduction measures to facilitate the implementation of larger zero emission zones in inner London by 2040 and London-wide by 2050 at the latest.

<sup>57</sup> <https://tfl.gov.uk/info-for/boroughs-and-communities/zero-emission-zones>

Stakeholder	Comment	Our response
	<p>change and traffic congestion. With regards to reducing emissions from road transport this will need action to ensure that London has fewer and cleaner vehicles on the road. The expansion of the ULEZ to cover all of Greater London and the development of road user charging schemes will contribute to this objective. We also propose that introducing Zero Emission Zones, which were also identified in the Mayor's transport Strategy, can be combined with road user charging schemes to accelerate the much-needed decarbonisation of road transport. The Mayor should seek to introduce a Zero Emission Zone in central London by 2025, as well as in other hotspots around Greater London.</p>	<p>from 2020 and aim to deliver a ZEZ in central London from 2025, as well as broader congestion reduction measures to facilitate the implementation of larger ZEZs in inner London by 2040 and London-wide by 2050 at the latest.</p> <p>The potential for combining ZEZs with a future RUC scheme would be explored if the Mayor asks TfL to undertake further work in this area.</p>
Brent Cycling Campaign	<p>This is good, but our councils also need to have legally binding, incremental targets to meet the 2040 target of 80% of journeys by walking, cycling or public transport, especially for cycling infrastructure as it's still very poor in many boroughs.</p>	<p>Boroughs are central to delivering the MTS and TfL works in partnership with boroughs through the LIP process to support them to make changes to their transport networks that will deliver the MTS 80% mode share target. Provisions for the LIP process are set out in the GLA Act 1999 including the powers of the Mayor in this area.</p>
Camden Friends of the Earth	<p>Air pollution is only one of the challenges which the MTS seeks to</p>	<p>The proposal is for a limited revision to the MTS to make provision for the possibility of</p>

Stakeholder	Comment	Our response
	<p>address. Despite what the title of the consultation would imply, Camden Friends of the Earth is concerned that the ULEZ will not bring comparable benefits to either climate change or congestion, and that the expansion of the ULEZ will be seen by policymakers and the public as a sufficient solution, when much greater changes are needed.</p>	<p>a future London-wide expansion of ULEZ. An expanded ULEZ would primarily address poor air quality but can also contribute to reduced vehicle numbers and carbon emissions. As part of the proposed revision, we have included new text on the triple challenges which includes the climate emergency and traffic congestion. While the proposed ULEZ expansion is a potential first step in addressing these challenges, there may be a wider role in the future for RUC in order to help meet the 27 per cent reduction in car vehicle kilometres which is part of the Mayor's preferred pathway.</p> <p>Additionally, while the Proposed Revision is important in helping to achieve the objectives of the MTS, it will not suffice on its own and for this reason the remainder of the MTS will remain in place, as will the subsequent Action Plans. TfL monitors and reports on progress via the MTS tracker and this is available online:</p> <p><a href="https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy">https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy</a></p>

Stakeholder	Comment	Our response
Clean Cities Campaign	We agree with the proposed change. However, further consideration should be given to updating the Mayor's Transport Strategy so that it falls in line with the Mayor's goal for a net zero capital by 2030 and it delivers on the recent evidence that a 27% reduction in km driven by cars will be needed by this time.	This support is noted.  The Proposed MTS Revision gives a policy basis to the triple challenges and allows for a London-wide expansion of ULEZ. In this way it is a highly-focused revision. At the same time, the narrative on the Climate Emergency element of the triple challenges (which forms part of the Proposed MTS Revision) describes how, in response to the Element Energy report on London's 2030 net zero target, the Mayor announced his preferred pathway to net zero in London.
Friends of the Earth London Network	We believe that the Mayor's Transport Strategy should be revised in line with the Committee on Climate Change's vehicle emissions reduction recommendation. We consider it very important that you take further steps to tackle the climate emergency by reducing emissions in London.	The Proposed MTS Revision would make it possible for TfL to address the climate emergency (as part of the triple challenge) through RUC schemes such as the London-wide expansion of ULEZ. It responds to the Element Energy report and the Mayor's subsequent announcement of his preferred pathway to net zero by 2030, which entails a reduction in car vehicle kilometres of 27 per cent.

**Table 22: Responses from Community Organisations**

Stakeholder	Comment	Our response
Highgate Society	The strategy should obviously reflect the plan to extend ULEZ. However a more important revision would be to introduce measures to reduce air pollution on London Underground.	<p>TfL is committed to tackling Tube dust, and London Underground operates well within the Health and Safety Executive specified limits. As well as regularly monitoring dust levels on the Tube network, TfL is also working with leading academics to conduct further studies to help inform on any health risks associated with dust on the Tube.</p> <p>TfL has undertaken a range of innovative cleaning initiatives to identify effective methods for reducing dust particles. These initiatives include industrial back-pack vacuum cleaners.</p> <p>Following the successful trial on the Piccadilly line in 2019, TfL incorporated this methodology into all tunnel cleaning, with at least 10,000 metres of tunnel cleaning carried out each period using vacuum back-pack cleaners, with specially adapted filters which increase their effectiveness. This work continued throughout the pandemic.</p> <p>In addition, following successful trials on the use of abatement methods to reduce dust levels associated with welding activity,</p>

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Stakeholder	Comment	Our response
		<p>which showed reduction of the release of dust by around 50 per cent, these welding techniques are now standard practice and a requirement of our Safety, Health and Environment Management system.</p>
Emerson Park & Ardleigh Green Residents' Association	<p>See question 13, above [refers to the Question in the survey on impacts assessments]. Please think about the elderly Londoners who will suffer disproportionately.</p>	<p>TfL commissioned Jacobs to undertake an impact assessment of the Proposed MTS Revision. Its findings with regard to protected characteristics are summarised in section 2.4. With regard to age, the proposal was assessed as moderate to major positive.</p> <p>A separate IIA was undertaken on the ULEZ scheme proposal itself. Comments received on this proposal will be responded to in a separate Report to Mayor.</p>
Queens Park Area RA	<p>The MTS should be changed first and then implementing measures consulted on. Current approach is muddled.</p>	<p>As set out in section 1.3, the Mayor directed TfL to undertake this consultation and issued supplementary guidance on the procedure to be followed in the situation where TfL is proposing a RUC scheme which would not be in conformity with the current MTS (set out in MD2987, see section 1.4 above). This guidance has been followed. While there was a single consultation on both the Proposed MTS Revision and the proposed London-wide expansion of ULEZ, decisions on these two proposals will be taken separately, with the</p>



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Stakeholder	Comment	Our response
		Mayor's decision on the Proposed MTS Revision first in the sequence (see Chapter 1). We consulted on different proposals in tandem in order to show them in the appropriate context and reduce the consultation burden on the public and stakeholders that may arise from multiple consultations.
Pepys Community Forum	Needs to be completely rethought	This comment is noted.
Friends of Crayford retired greyhounds	Ludicrous	This comment is noted.
Fit for Walking	The amendments to the MTS do not address the problems in a realistic way and they are opposed for lack of ambition.	<p>The proposed revision is intended to consolidate and update RUC policy as well as providing a basis for the proposed ULEZ expansion. An expanded ULEZ scheme would be a potential first step in addressing the air quality challenge primarily (as well as having secondary benefits for the other challenges and other MTS objectives).</p> <p>If a new scheme other than the London-wide ULEZ were to be proposed, there would need to be further consultation on specific scheme proposals and potentially a further revision to the MTS to provide for the precise scheme.</p>

**Table 23: Responses from Businesses and business representative organisations**

Stakeholder	Comment	Our response
Federation of small business (FSB)	FSB London asked our membership/small businesses “Did you know that the Mayor of London’s Transport Strategy 2018 details approach to potential new road user charging schemes which states that TfL is to keep the Congestion Charge and other road user charges under review?” 55 per cent said they were aware whilst 45 per cent said they were not aware.	This comment is noted.
National Franchised Dealers Association	Revision of the Mayor’s Transport Strategy (MTS). The NFDA hope that the new revision will include more incentives for people to switch to electric vehicles through commitments to improving the EV charging infrastructure, rather than just hitting drivers with fines and restrictions in an attempt to force them onto public transport. There are many people who rely on private vehicles for everyday life, especially in outer London, and the switch to an electric vehicle is too costly for many.	The Proposed MTS Revision and the proposed London-wide ULEZ expansion that it provides for, are intended to encourage people to choose more sustainable transport options, including a switch to cleaner vehicles (although not necessarily electric vehicles). The London Electric Vehicle Infrastructure Strategy <sup>58</sup> sets out our projections for London’s public charging infrastructure requirements by 2030 and proposes our approach to working with the wider public and private sector to accelerate the transition to zero emission vehicles.

<sup>58</sup> <https://tfl.gov.uk/modes/driving/electric-vehicles-and-rapid-charging#2030>

Stakeholder	Comment	Our response
Confederation of British Industry (CBI)	The next Mayor's Transport Strategy (MTS) must also reflect the expansion of the ULEZ when it is revised, and we would welcome the opportunity to be involved in discussions about shaping the next MTS.	At this stage there are no plans to further revise the MTS. If a new scheme other than the London-wide ULEZ were to be proposed, there would need to be further consultation on specific scheme proposals and potentially a further revision to the MTS would be needed.
Confederation of Passenger Transport (CPT)	The Mayor's Strategy on clean air should take proper account of the lower emission levels that euro 5 diesel engined PSV's are capable of. Therefore, they should be exempted from any charges.	Proposal 24.1, if approved by the Mayor, would make implementation of a London-wide ULEZ possible but it does not of itself confirm that scheme, which would be subject to a separate Mayoral decision, and the detail of the scheme – including emission standards – would be addressed in that decision. It is not appropriate to address scheme details such as this in an MTS revision.
Team London Bridge BID	Supports the MTS amendments as a means to tackle the triple challenge and notes that traffic is a significant factor and that the overall number of vehicles needs to be reduced (as well as specific vehicle types) in order to address these issues.	This support is noted and the proposed draft narrative for the Addendum refers to traffic reduction as key to addressing the triple challenges.
Voi Technologies Ltd	Voi strongly supports the introduction of road user charging (RUC).  ...	The support is noted.

Stakeholder	Comment	Our response
	We are, therefore, pleased that this direction of travel is so clearly sign-posted in the proposed revision.	
Nichols Group	<p>The proposed revision to the Mayor's Transport Strategy would be step forward towards integrating the approach to the Triple Challenge, but it allows for multiple schemes which would be burdensome on citizens and potentially contradictory. The strategy change should aim higher at "a single charging scheme".</p> <p>Also, closer links are needed to "updated policy on scrappage and encouraging shared use vehicles rather than replacement". This aim should also be mentioned in the revision.</p>	<p>The Proposed MTS Revision would incorporate the triple challenge into the MTS as a policy basis for RUC schemes and allow for a London-wide expansion of ULEZ. Another strand of the consultation focuses on a potential future integrated RUC scheme (as set out in Proposal 21 of the MTS), and this will be reported on separately.</p> <p>With regard to a scrappage scheme, this is not the type of information that it is appropriate to include in an MTS revision, which must by its nature be strategic. However, information on any scrappage scheme, or other mitigations, would be given if a further scheme is approved.</p>
Purley BID	This is not at all appropriate for supporting business in Purley and the local residents who have to travel a couple of miles across hilly terrain. We do not support this at all.	This opposition is noted. We note the concerns of Purley BID. The IIA recognises that, if the ULEZ expansion comes into effect, it will have some potential negative impacts for some individuals who live in outer London. Those adverse impacts will

Stakeholder	Comment	Our response
		be considered alongside other factors including any positive consequences that will follow from ULEZ expansion.
Bolt	<p>Bolt fully supports the amendments to the Mayor's Transport Strategy.</p> <p>Bolt believes that personal safety, inclusion are all important benefits that can be delivered within the changes proposed in the Mayor's Transport Strategy and highlighted in this consultation. They are not mutually exclusive and need to be carefully considered based on the potential outcomes which rely on barriers to providing a reliable, accessible and readily available provision of a portfolio of public, personal and shared transport solutions.</p>	This support is noted.
Uber	<p>We support the proposed revisions to the Mayor's Transport Strategy (MTS) on the basis that they will allow for the ULEZ to be expanded London-wide. Uber also supports revising the strategy to set out the triple threat of air pollution, the climate emergency and congestion. Tackling these threats is a priority for Uber and something we</p>	This support is noted.

Stakeholder	Comment	Our response
	have considered at length through our COP26 declaration, work to reduce congestion and to encourage EV uptake.	

**Table 24: Responses from Charities**

Stakeholder	Comment	Our response
Heathrow Special Needs Centre	This is a tax raising policy in the first instance. Stop polluting aircraft from flying over London first.	<p>The Proposed MTS Revision would incorporate the triple challenge into the MTS as a policy basis for RUC schemes and allow for a London-wide expansion of ULEZ. There is no revenue-raising objective as part of either the Proposed MTS Revision nor the potential scheme it provides for. The GLA Act provides that net revenue raised by a RUC scheme must be used to facilitate the delivery of the MTS.</p> <p>The Mayor continues to raise concerns about the environmental impacts of aviation with the Government, the Civil Aviation Authority and airports through meetings, consultation responses and London Plan Policy T8.</p>

Stakeholder	Comment	Our response
Watford Recycling Arts Project	<p>This seems to be an inefficient way of achieving significant reductions in CO2 emissions if you continue to permit polluting vehicles into the zone through payment. The percentage achieved is very low in comparison to the financial cost of administering the scheme. Climate emergency might better be addressed by widespread tree planting and preserving green areas from building. A proper attempt at creating SAFE cycling routes with priority would go further to reducing internal journeys. This does not abnegate the fact that commuters are packed too tight into expensive urban commuter trains that do not always run when required (shift workers) and so still require personal vehicles. Nothing in the proposal indicates what levels of revenue will be generated by the scheme and how it is proposed to spend it mitigate the triple challenges.</p>	<p>The rationale for the selection of the ULEZ expansion for consultation is set out in section 1.3. It takes place in the context of the proven effectiveness of RUC schemes in tackling traffic congestion and emissions (as described in section 2.2); furthermore, the proposal does not stand in isolation from other interventions – set out in the MTS and in the London Environment Strategy – to address the climate emergency, including increased cycling and the promotion of green spaces.</p> <p>As the Proposed MTS Revision does not contain detailed information on impacts, it would not be appropriate to provide information concerning expected revenue. The GLA Act provides that net revenue raised by a RUC scheme must be used to facilitate the delivery of the MTS.</p>

### 5.3. Statutory stakeholders in respect of the SEA

- 5.3.1. As described in section 2.3, the three statutory stakeholders for the SEA were consulted on the Scoping Report, and their comments are included in the IIA at Appendix C. For clarity, their comments (if any) in response to the consultation are shown in Table 25.

**Table 25: Statutory stakeholders for the SEA**

Stakeholder	Comment	Our response
Environment Agency	<p>Thank you for the opportunity to comment on the Mayor's proposals to expand London's Ultra-Low Emissions Zone (ULEZ). We have also provided comments in response to the accompanying Integrated Impact Assessment (IIA) report.</p> <p>We support measures that improve the environment and public health. Clean air is critical for our health, to sustain wildlife and provide essential services that support our lifestyles and economy. It helps to provide the natural capital on which we all depend. 'Healthy air, land and water' is one of the priorities of the Environment Agency's 5-year Action Plan EA2025 Creating a Better Place.</p> <p>We are also committed to supporting the response to the climate emergency in London. We therefore see strong alignment between our organisation's wider strategic objectives for the environment, London, and Londoners. We are an arms-length body of the Department for Environment, Food and Rural Affairs (DEFRA). We support the principle of the ULEZ and other Clean Air Zones (CAZs) as outlined in Defra's Clean Air Framework.</p>	These comments are noted.



Stakeholder	Comment	Our response
	<p>We have no comments to make on the suitability of the proposed charges or the geographical expansion of the ULEZ, which we consider to be matters for the Mayor and the people of London. We have included some further comments in response to the Integrated Impact Assessment as an appendix to this response. Impacts on sustainable resource use and waste management: We have some concerns with regards to potential impacts on waste operations which we regulate in London. The expanded ULEZ could potentially result in the relocation of some permitted waste operations to locations beyond the ULEZ, and beyond the Greater London boundary.</p> <p>The IIA (page 64) estimates that the expansion of ULEZ would generate an average of an additional 36,600 tonnes of scrappage waste per annum in the first few years after implementation. It could also result in an increase in fly tipping or illegal waste operations and activities which the IIA acknowledges. Both of these potential impacts, if they were to be realised, have potential to impact on the Mayors ambition (London Environment Strategy and London Plan 2021) for London to be net-waste sufficient by 2026 (the equivalent of 100 per cent of London's waste should be managed within London). We</p>	<p>These comments about waste were addressed in section 1.4 of the 2022 MTS Revision IIA as follows:</p> <p>Impacts to waste operations were considered as part of the assessment that accompanied the introduction of the London-wide Low Emission Zone.</p> <p>It is assumed that all successful applicants for a new scrappage scheme will be required to prove they have scrapped their vehicles an Authorised Treatment Facility in order to qualify for a grant.</p> <p>Under the ELV directive, there is a target for a minimum of 95 per cent recycling and recovery of ELVs, so the legislation is already well designed to mitigate any increases in hazardous or non-hazardous waste generated from increased scrappage because of the implementation of the proposal.</p> <p>For owners of non-compliant vehicles that do not qualify for scrappage, the risk of illegal fly tipping is considered to be low in the context of the current demand for second-hand vehicles nationally and the historically high price of scrap metal.</p>

Stakeholder	Comment	Our response
	look forward to continued positive dialogue between our teams on safeguarding, and if/where necessary increasing, London's waste capacity to support delivery of these ambitions which we enthusiastically support.	<p>The potential for increased fly-tipping in those peripheral areas of Greater London which would not fall within the expanded ULEZ is acknowledged.</p> <p>It is not expected that all non-compliant vehicles will be scrapped: there are retrofit options available for vans and minibuses.</p> <p>In addition, the ULEZ IIA (distinct from the MTS Revision IIA) assessed the potential impacts of the London-wide expansion of ULEZ on sustainable resource use and waste management, and found that these were neutral.</p>
Historic England	No response received	
Natural England	The organisation notes that the proposed boundary for the expanded ULEZ cuts through Epping Forest Special Area of Conservation (SAC) and advises that TfL conducts a Habitats Regulation Assessment to rule out any impacts from the proposed expansion on Epping Forest SAC. Referring to the Integrated Impact Assessment, they note that the expansion is likely to see a reduction in traffic within the proposed zone and areas of non-greater London but suggest that the scheme should follow the process of the Habitats Regulations. They suggest that a Habits	<p>In response to the comments made by Natural England EFDC, TfL commissioned Jacobs undertake a habitats assessment (as described in section 2.5).</p> <p>This assessment found that there were no likely significant effects at any of the sites identified, including Epping Forest SAC.</p> <p>The HRA Report is at Appendix D.</p>

Stakeholder	Comment	Our response
	Regulations Assessment could be informed by the information provided within the IIA.	

#### 5.4. Themes raised by public and stakeholders (counts)

5.4.1. The tables in this section summarise the analysis undertaken by AECOM, where comments made in response to Question 14, and other MTS related comments, were assigned codes. For the public, two count totals are given: one including the organised responses (see section 4.3); and one without.

#### *General comments about the Proposed MTS Revision*

**Table 26: Responses to general comments**

Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
<b>500</b>	Support / agree with the revisions to the MTS (general comments)	6,164	1,149	28	We have noted these comments.
<b>501</b>	Support / agree with the revisions to the MTS to expand the ULEZ	432	410	17	We have noted these comments.

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Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
<b>502</b>	Support the revision to the MTS but feel that the wording needs changing / suggestions of alternative wording	38	38	10	<p>In general these comments pertained to:</p> <ul style="list-style-type: none"> <li>• Criticism of writing style/call for simpler language</li> <li>• Stating that the Strategy should explore other options</li> <li>• Stating that more information on impacts should be included (see 507 below)</li> <li>• Stating that the Strategy should go further (see 503 below)</li> </ul> <p>The style of the proposed Addendum is intended to fit with the MTS which is a statutory document and adopts an appropriate style for that function. However, in order to reach a wide audience and respond to different needs, we also provided Easy Read versions of the Consultation document and questionnaire.</p> <p>While it would not be appropriate for the Strategy itself to explore other options, considerable option development and assessment was carried out in preparing the MTS for consultation in 2017<sup>59</sup> and again in preparing for this current consultation (described in Chapter 2 of this report).</p>
<b>503</b>	MTS should go further to achieve stated aims /	184	184	7	The consultation concerned only a limited revision of the MTS in respect of Proposal 24; it was not

<sup>59</sup> See for example the MTS Evidence Base <https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy>

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Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
	should be more ambitious				<p>intended as a general update or replacement of the Strategy as a whole. The MTS was itself subject to consultation in 2017.</p> <p>If a new scheme other than the London-wide ULEZ were to be proposed, there would need to be further consultation on specific scheme proposals and potentially a further revision to the MTS to provide for the precise scheme.</p>
<b>504</b>	Oppose / disagree with the revisions to the MTS (general comments)	4,600	4,600	7	<p>The Proposed Revision to the MTS is necessary to achieve conformity between the ULEZ scheme and the MTS if a decision is subsequently made to expand ULEZ London-wide. It also introduces the triple challenge as a policy basis for further RUC schemes including the proposed expansion of ULEZ.</p> <p>However the revision by itself does not implement ULEZ expansion and this is subject to a separate decision by the Mayor.</p> <p>If the Mayor decides to proceed with the expansion of the ULEZ London-wide in the near term that will make a contribution to tackling air pollution in outer London, as well as having secondary benefits for reducing carbon emissions and improving traffic congestion.</p> <p>Without further action to reduce air pollution, around 550,000 Londoners will develop diseases</p>

Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
					<p>related to poor air quality over the next 20 years, with the greatest number of deaths related to air pollution likely to be in outer London boroughs. This is due to the higher proportion of elderly people in these areas, who are more vulnerable to the impacts of air pollution.</p> <p>The ULEZ has proven to be an effective mechanism in reducing emissions and therefore tackling air pollution in both central and inner London. The proposed expansion of the ULEZ London-wide is estimated to reduce NO<sub>x</sub> emissions in outer London from cars by 9.6 per cent and 6.6 per cent for vans. This results in an average overall reduction in NO<sub>2</sub> concentrations in outer London of 1.6 per cent, one per cent in inner London and 0.7 per cent in central London. This means that nearly 30,000 additional Londoners would live in areas meeting the World Health Organization interim target of 30 µg/m<sup>3</sup> and 340,000 additional Londoners would live in areas meeting the tighter interim target of 20 µg/m<sup>3</sup>.</p>
<b>505</b>	Oppose / disagree with the revisions to the MTS to expand the ULEZ	7,637	2,909	16	As set out in the preceding response, the Proposed Revision to the MTS is necessary to achieve conformity between the ULEZ scheme and the MTS if a decision is subsequently made to expand ULEZ London-wide. It also introduces the triple challenge

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Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
					<p>as a policy basis for further RUC schemes including the proposed expansion of ULEZ.</p> <p>The Proposed MTS Revision is necessary to make provision for a possible future London-wide expansion of ULEZ. It introduces the triple challenge as a policy basis for further RUC schemes including this potential expansion of ULEZ, and sets out the objectives and area for this expansion. Without such a revision, it would not be possible to implement a potential future ULEZ expansion, because RUC schemes must be in conformity with the MTS. However the revision by itself does not implement ULEZ expansion and this proposal would be subject to a separate and subsequent mayoral decision.</p> <p>The expansion of the ULEZ London-wide in the near term will help to tackle air pollution in outer London, as well as having secondary benefits for reducing carbon emissions and improving traffic congestion.</p> <p>Without further action to reduce air pollution, around 550,000 Londoners will develop diseases related to poor air quality over the next 20 years, with the greatest number of deaths related to air pollution likely to be in outer London boroughs. This</p>

Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
					<p>is due to the higher proportion of elderly people in these areas, who are more vulnerable to the impacts of air pollution.</p> <p>The ULEZ has proven to be an effective mechanism in reducing emissions and therefore tackling air pollution in both central and inner London. The proposed expansion of the ULEZ London-wide is estimated to reduce NO<sub>x</sub> emissions in outer London from cars by 9.6 per cent and 6.6 per cent for vans. This results in an average reduction in NO<sub>2</sub> concentrations in outer London of 1.6 per cent, one per cent in inner London and 0.7 per cent in central London. This means that nearly 30,000 additional Londoners would live in areas meeting the World Health Organization interim target of 30 µg/m<sup>3</sup> and 340,000 additional Londoners would live in areas meeting the tighter interim target of 20 µg/m<sup>3</sup>.</p>
<b>506</b>	Suggest there should be a vote / referendum on MTS revisions / ULEZ expansion	160	160	2	TfL on behalf of the Mayor has carried out numerous statutory consultations on RUC schemes and related to the MTS. The present consultation has followed this approach, and it would not be appropriate to hold a vote or referendum on such matters.
<b>507</b>	Revisions to MTS / ULEZ expansion are	723	723	39	A revision to the MTS is required in order to allow for a London-wide expansion of ULEZ, as Proposal



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Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
	not justified / insufficient supporting evidence provided				<p>24 in its current form provides only for an expansion of ULEZ to inner London (which was implemented in October 2021).</p> <p>As part of the consultation, TfL provided a suite of documents relating to all of the proposals. For the MTS Revision these were:</p> <ul style="list-style-type: none"> <li>• An IIA of the proposed revision, carried out by Jacobs (2022 MTS Revision IIA)</li> <li>• An updated Baseline Report (updating the data used for the 2018 MTS IIA, used in both the 2022 MTS Revision IIA and in the ULEZ expansion IIA)</li> <li>• Overview document (summarising all the proposals including the Proposed MTS Revision)</li> <li>• The text of the Proposed MTS Revision</li> </ul> <p>The list above concerns the Proposed MTS Revision: a full list of consultation materials is provided in Chapter 3.</p>
<b>508</b>	Was not aware of the MTS / its role in improvements / planning	23	23	0	<p>The Mayor's Transport Strategy (MTS) is the principal policy tool through which the Mayor exercises his responsibilities for the planning, development, provision, and management of transport in London. The Mayor is required to</p>

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Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
					prepare and publish a transport strategy and to keep that strategy under review. The MTS and annual monitoring reports are available on TfL's website: <a href="https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy">https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy</a>
<b>509</b>	Other comments about the MTS Revisions	115	115	8	These comments are noted.

## *Comments about the triple challenges*

**Table 27 Responses to comments raised in relation to the triple challenges**

Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses )	Times raised (stakeholder)	Our response
<b>530</b>	Support / agree that air quality / health and wellbeing is an important topic / needs to be improved	937	909	25	These comments are noted.
<b>531</b>	Oppose / disagree that air quality / health and wellbeing is an	409	409	1	The Mayor has a legal duty to achieve the legal limits for air pollutants in Greater London. Toxic air pollutants (PM <sub>2.5</sub> and NO <sub>2</sub> ) from road traffic, have a

Report to Mayor (MTS revision consultation)

Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses )	Times raised (stakeholder)	Our response
	important topic / needs to be improved				<p>damaging impact on Londoners' health, stunting the growth of children's lungs and worsening chronic health conditions such as asthma, lung and heart disease. In 2019 toxic air is estimated to have contributed to the premature deaths of around 4,000 Londoners. If no further action is taken to reduce air pollution, around 550,000 Londoners will develop diseases related to poor air quality over the next 30 years.</p> <p>The proposed expansion of the ULEZ London-wide is intended to improve air quality in outer London by encouraging individuals to use sustainable transport or switch to cleaner vehicles. This is expected to reduce the number of non-compliant cars from 160,000 to around 46,000 at the end of 2023. It's estimated that around 70,000 will switch to compliant vehicles and the rest will change their behaviour.</p> <p>If implemented, ULEZ expansion is expected to result in a reduction in NO<sub>x</sub> emissions from cars in outer London of 9.6 per cent and a reduction from vans of 6.6 per cent. London-wide, reductions in road transport NO<sub>x</sub> emissions are estimated to be 5.4 per cent, equivalent to 362 tonnes of NO<sub>x</sub></p>

Report to Mayor (MTS revision consultation)

Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses )	Times raised (stakeholder)	Our response
<b>532</b>	Support / agree that the climate emergency is an important topic / needs to be improved	318	318	21	These comments are noted.
<b>533</b>	Oppose / disagree that the climate emergency is an important topic / needs to be improved	144	144	0	<p>In February 2022, the UN's Intergovernmental Panel on Climate Change (IPCC) warned that global warming, reaching 1.5°C in the near-term, would cause unavoidable increases in multiple climate hazards and present multiple risks to ecosystems and humans.<sup>60</sup> In urban settings, observed climate change has already caused impacts on human health, livelihoods and key infrastructure. It is clear that without urgent action, the world is on track for catastrophic temperature increases. We must therefore rapidly reduce emissions to limit the worst effects of the climate emergency.</p> <p>The proposed ULEZ expansion will contribute to reducing carbon emissions and traffic congestion. If it is implemented, a 1.4 per cent reduction in carbon emissions from cars in outer London is expected, compared to the 2023 baseline without the expansion.</p>

<sup>60</sup> [https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC\\_AR6\\_WGII\\_SummaryForPolicymakers.pdf](https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf)

Report to Mayor (MTS revision consultation)

Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses )	Times raised (stakeholder)	Our response
<b>534</b>	Support / agree that traffic congestion is an important topic / needs to be improved	266	265	18	These comments are noted.
<b>535</b>	Oppose / disagree that traffic congestion is an important topic / needs to be improved	123	123	0	<p>In 2021, the cost of traffic congestion in London was estimated at £5.1 billion with the average driver losing 148 hours to congestion per year.<sup>61</sup> Congestion also delays bus services (discouraging passengers to shift to bus usage) and essential freight and servicing trips. It also makes public spaces unpleasant for walking and cycling, and worsens air pollution.</p> <p>If implemented, the London-wide ULEZ is expected to result in a one per cent reduction in total car kilometres in outer London.</p>

<sup>61</sup> <https://inrix.com/press-releases/2021-traffic-scorecard-uk/> This figure does not take into account the cost of congestion on bus passengers and bus operating costs.

## 5.5. Impacts of the proposals

**Table 28: Comments on 2022 MTS Revision IIA**

<b>Code frame reference number</b>	<b>Issue/comment</b>	<b>Times raised (public excluding organised responses)</b>	<b>Times raised (public including organised responses)</b>	<b>Times raised (stakeholder)</b>	<b>Our response</b>
<b>411</b>	Comment about the integrated impact assessment (IIA) carried out for the Mayor's Transport Strategy	<b>14</b>	<b>14</b>	<b>4</b>	<p>Comments concerned the impacts of ULEZ expansion on low-income people, BAME people and those with a disability.</p> <p>As set out in section 2.3, TfL commissioned Jacobs to undertake an IIA including a SEA of the Proposed MTS Revision. The findings of that assessment are summarised in section 2.3 and section 2.4 (impact on protected characteristics and equalities). There were no impacts identified across any of the IIA objectives that were significant enough at the strategic level to change the assessment score for the 2018 MTS IIA as a whole.</p> <p>A separate IIA was undertaken on the proposed London-wide expansion of ULEZ. Information on potential mitigations of impacts, where appropriate, will be set out in the report to the Mayor relating to the ULEZ scheme proposal.</p>

## 5.6. Views on the consultation

5.6.1. The questionnaire asked respondents for their views on the consultation in both a closed question (please see Table 13 in section 4.5 above) and via a comments box. Table 29 below is the analysis of comments made in the comments box: please note that it is based on all respondents to the questionnaire and not solely on those commenting on the Proposed MTS Revision.

**Table 29 Comments relating to the consultation (all respondents to the consultation)**

Code frame reference number	Our reference	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
<b>890</b>		Positive comments about consultation	28	28	0	These comments are noted.
<b>891</b>		Negative comments about consultation (e.g. criticism)	1874	1872	27	<p>TfL's consultations are planned and delivered according to good practice standards and consultation law requirements.</p> <p>The consultation provided the opportunity for the public and stakeholders to answer questions about expanding the ULEZ scheme London-wide; removing the annual £10 per vehicle Auto Pay registration fee for the Congestion Charge, ULEZ and Low Emission Zone; increasing the Penalty Charge Notice level from £160 to £180 for non-payment of the</p>

<b>Code frame reference number</b>	<b>Our reference</b>	<b>Issue/comment</b>	<b>Times raised (public including organised responses)</b>	<b>Times raised (public excluding organised responses)</b>	<b>Times raised (stakeholder)</b>	<b>Our response</b>
						<p>Congestion Charge and ULEZ; and views on shaping the future of road user charging.</p> <p>Further opinions could be expressed within three open textboxes, while it was also possible to send views on the proposed changes by email or post if people did not wish to respond through the online survey.</p> <p>A variety of materials were provided to support the consultation. These included plain English summaries of technical documents, providing a clear explanation of what was being proposed, why the changes were being proposed, and what the proposed changes were forecast to achieve. This was supported by a technical IIA, which considered in detail the implications of the scheme across various themes as well as an equalities impact assessment. An 'Easy Read'</p>



<b>Code frame reference number</b>	<b>Our reference</b>	<b>Issue/comment</b>	<b>Times raised (public including organised responses)</b>	<b>Times raised (public excluding organised responses)</b>	<b>Times raised (stakeholder)</b>	<b>Our response</b>
						<p>version of the consultation materials and survey was also available.</p> <p>The consultation was hosted on our consultation portal which aimed to provide information for people whether they had limited time and wanted a quick overview of the proposals, or if alternatively, they wished to read the background to the proposals in detail. While it was necessary for people to register to respond to the consultation and use the portal for the first time, the same log-in information can be used for future consultations without having to repeat the standard questions, such as those regarding demographic information. For those who did not wish to register, it was possible to access the supporting information without registering and to send a submission to the consultation by email or post.</p>

Code frame reference number	Our reference	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						Marketing included an extensive email campaign, national press and digital advertising, radio advertising, social media, letter drops to local centres such as community centres and a press release issued to all relevant media. Further details are set out in Chapter 3 of this report.
<b>892</b>		Other comments about consultation	109	109	16	These comments are noted.
<b>893</b>		Comment about legally challenging the proposals	38	38	1	These comments are noted.

## 5.7. Late responses

- 5.7.1. Responses received after the formal close of consultation have been included in the analysis in the preceding sections. Additionally, a total of eight stakeholder responses were received well after the close of the consultation (in September 2022) and are not included in that analysis. Only one of these stakeholder responses, from the St George's University Hospitals Foundation Trust, included comments on the Proposed MTS Revision.
- 5.7.2. The Trust commented: "The Trust finds the proposed Mayor's Transport Strategy regarding the expansion of ULEZ London-wide appropriate and acceptable. The Trust takes the challenge on clean air very seriously and believes the ULEZ expansion throughout London would aid with the reduction of toxicity in the air."

## 6. Conclusions and recommendations

### 6.1. Conclusion

#### ***The consultation on the Proposed MTS Revision***

- 6.1.1. The Proposed MTS Revision has been developed in the context of the need to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion. One means by which these challenges can be addressed is through RUC schemes. The MTS does not, in its current form, allow for ULEZ to be expanded London-wide, which is being proposed as the next step in tackling the triple challenges. The Proposed MTS Revision would make it possible for the Mayor to introduce an expanded ULEZ and also update and consolidate the policy foundation for RUC schemes as we look to the future. The revision is relatively limited in scope and would be in the form of a supplement to the MTS.
- 6.1.2. The ten-week consultation undertaken between May and July 2022 encompassed a number of proposals in addition to the Proposed MTS Revision, including the scheme proposal to implement an expanded ULEZ scheme. We also asked for views on the potential future of RUC in London. There were 57,913 responses to this consultation in total, including three campaigns providing organised responses concerning the Proposed MTS Revision. However, as described in this report and in the AECOM analysis (Appendix B), there were fewer comments (around a third of the total) made concerning the Proposed MTS Revision compared to the other elements of the consultation (which will be reported to the Mayor in a separate document and will be subject to a separate decision).
- 6.1.3. Where comments were made about the Proposed MTS Revision, around twice as many of the responses received from members of the public opposed it as supported it. The primary reason offered for opposing it was that respondents did not support the proposed expansion of the ULEZ, which would be made possible by the Proposed MTS Revision. For stakeholders, this was reversed, with the majority of stakeholders supporting the revision. Of the three campaigns concerning the Proposed MTS Revision, two were supportive.
- 6.1.4. Some stakeholders, in particular certain London boroughs, stated that further revisions should be made to the MTS, including in some instances, calling for a wholesale revision of the MTS. Siân Berry AM and the London Assembly Transport Committee commented that road danger reduction should be included as a rationale for RUC in the revision. It is important to note that the Proposed MTS Revision constitutes a relatively small part of the MTS as a whole, and that the MTS as originally published in March 2018 remains in place. While the Proposed MTS Revision is directed at addressing the triple challenges, RUC measures may also contribute to many other MTS objectives including road danger reduction, traffic reduction and encouraging active travel which is beneficial to Londoners' health.

- 6.1.5. Some consultation responses also raised concerns about there being sufficient engagement with the public and stakeholders and sufficient information (including about impacts) provided in relation to any new RUC schemes that might be brought forward as a consequence of the Proposed MTS Revision. It is worth reiterating that the Proposed MTS Revision does not by itself implement any new or modified scheme and a separate, scheme specific consultation would need to be undertaken before such scheme could be established. For example, the proposed ULEZ expansion London-wide was itself consulted on as a separate element of the consultation and will be subject to a separate Mayoral decision if the Proposed MTS Revision is published. The Proposed MTS Revision also does not constitute a proposal to introduce further RUC schemes (other than ULEZ expansion London-wide); any proposals to do so may require the MTS to be further revised and would need to be separately consulted on in accordance with the established mayoral guidance for RUC consultations.
- 6.1.6. Comments on the Proposed MTS Revision which stated their opposition to the proposed expansion of ULEZ London-wide are noted. The Mayor will have a further and fuller opportunity to take those views into account if the Proposed MTS Revision is published and the Mayor is asked to take a separate decision concerning whether or not to expand the ULEZ. The opposing views should be considered in the context of the entire decision-making process. As has been emphasised throughout this report, publication of the Proposed MTS Revision makes it possible for the Mayor to go on and make a separate decision on whether the ULEZ scheme should be expanded London-wide but does not of itself implement that scheme. The Proposed MTS Revision also serves a purpose beyond the proposed ULEZ expansion in that it consolidates and updates the policy foundation for RUC in London going forward.
- 6.1.7. Additionally, it is important to note the option development undertaken prior to consultation (set out in section 1.3) that informed the drafting of the Proposed MTS Revision. Presented with the options, the Mayor asked TfL to consult on the proposal to expand the current ULEZ to outer London so that it would apply London-wide from 2023 because this had the potential to strike the right balance between maximising health and environmental benefits for Londoners while minimising the adverse impacts on drivers. The Mayor also identified that a reduction in car vehicle kilometres is essential to addressing the triple challenges. These proposals are reflected in the Proposed MTS Revision.

### ***The triple challenges***

- 6.1.8. Many stakeholder comments were supportive of the Proposed MTS Revision and recognised the need to respond to the triple challenges. For air quality, the actions set out in the MTS – such as the implementation of the central and then inner London ULEZ – have already achieved reductions in air pollutant emissions from transport and brought air quality benefits to Londoners. But toxic air pollution remains the biggest environmental risk to

the health of all Londoners, particularly the most vulnerable. Achieving UK and EU air pollutant legal limits remains an important objective of the MTS (and other mayoral strategies) while areas within London remain non-compliant. Furthermore, the Mayor is entitled to take a more ambitious position as regards the triple challenges. In particular, that more ambitious approach can properly be informed by up-to-date research and policy development relating to the scientific evidence concerning the effects of pollution – such as the updated WHO guidelines and new evidence on the impacts of poor air quality on Londoners' health – when considering road user charging policy in order to allow for appropriate interventions now and in the future.

- 6.1.9. Similarly, while some progress has been made on reducing carbon emissions from vehicles, and the MTS sets out a timeline of actions for achieving zero carbon from transport by 2050, it is necessary to make further changes given the urgency of the situation. In February 2022, the UN's Intergovernmental Panel on Climate Change (IPCC) warned that global warming would cause unavoidable increases in multiple climate hazards and present multiple risks to ecosystems and humans, with the most vulnerable the most at risk from adverse impacts. In the face of the climate emergency, the Mayor has stated that his preferred pathway to net zero carbon in London entails a 27 per cent reduction in car vehicle kilometres by 2030. If that pathway is to be followed, TfL and the Mayor need to take steps now.
- 6.1.10. Finally, traffic congestion cost London £5.1 billion in 2021. Congestion levels have returned to close to pre-Covid-19 pandemic levels. Congestion leads to lost time for drivers as well as increasing air pollution and carbon emissions. It also has adverse impacts on journey times for bus users, making this a less attractive mode of transport, and impacts on essential trips such as freight and servicing (including the emergency services). Reducing traffic is an important tool to address all three of the challenges.
- 6.1.11. Three RUC schemes operate in London, and these have already proven effective in contributing to the achievement of a range of objectives including reducing traffic congestion and vehicle emissions, and improving air quality. Depending on how schemes are defined, there is also scope for other objectives to be met, including for example road danger reduction. The MTS clearly recognises a role for RUC and the Proposed MTS Revision would affirm the role that road user charging would play in addressing the triple challenges as well as allow for a specific scheme in the form of a London-wide expansion of ULEZ.

### ***Impact assessments***

- 6.1.12. In addition to the consultation responses, the Mayor is required to consider the 2022 MTS Revision IIA and the habitats assessment when making his decision. The IIA undertaken in respect of the proposed revision builds on and takes the same assessment approach as the IIA that was undertaken for the MTS in 2017. The assessment concluded that while the Proposed MTS Revision may have some potential negative impacts, there were none

identified that are significant enough at this strategic level to change the existing scoring of the MTS overall. The Mayor is asked to take into account all of the potential impacts, positive and negative.

- 6.1.13. As described in section 2.5 of this report, Natural England stated in its consultation response that a habitats assessment should be undertaken in respect of the impacts of ammonia emissions at Epping Forest. TfL commissioned Jacobs to undertake the habitats assessment process, the first stage of which is a screening. In summary this screening found that there were not likely to be any significant effects at the identified sites arising out of the Proposed MTS Revision or scheme proposal for the expanded ULEZ; therefore it is not necessary to proceed to an 'Appropriate Assessment' under the Habitats Regulations.

***The consequences of publishing (or not publishing) the Proposed MTS Revision***

- 6.1.14. As set out in section 1, the Mayor's decision to publish the Proposed MTS Revision would be made subject to the London Assembly's scrutiny power. If the Mayor decides he wishes to publish the Proposed MTS Revision or a modified version of it, he must lay that version before the Assembly prior to publication. If the Assembly carry a motion to reject the revision within 21 days of it being laid, it cannot be published. If, however, the Assembly do not reject the revision then it will be published alongside the 2018 MTS as a supplementary addendum.
- 6.1.15. For the avoidance of doubt, the decision to publish the revised MTS would not require the Mayor to proceed with ULEZ expansion. That is a scheme level proposal that will be subject to full, detailed and separate consideration if the Proposed MTS Revision is published. This report has touched on the impacts of ULEZ expansion, and some of the arguments advanced for and against it because publication of the Proposed MTS Revision would make expansion of ULEZ possible. However, the decision whether to proceed with the ULEZ expansion proposal is separate and subsequent to the decision whether to publish the Proposed MTS Revision.
- 6.1.16. The Proposed MTS Revision also updates and consolidates the policy objectives that RUC schemes in general should aim to achieve by introducing the concept of the triple challenges into a new RUC proposal. Each element of the triple challenges (air quality, the climate emergency and traffic congestion) is already referred to within the current version of the MTS. The three existing RUC schemes already have impacts to varying degrees on these different challenges depending on their specific objectives and design. To this extent, the wording of the Proposed MTS Revision is a consolidation and update of existing RUC policy. A decision not to proceed with publication would not, therefore, hinder existing RUC schemes from continuing to address the elements of the triple challenges which are relevant to the scheme. Nor would it preclude an existing scheme from being modified to address an element which it is not currently designed to address

(subject to any proposed scheme changes being in conformity with the MTS and consulted upon).

- 6.1.17. Should the Mayor decide not to approve the Proposed MTS Revision for publication, it would not be possible to implement the ULEZ expansion scheme proposal. This is because the statutory framework for RUC requires that RUC schemes must be in conformity with the MTS and, as explained in different sections of this report, the current version of the MTS does not allow for the expansion of the ULEZ beyond inner London.
- 6.1.18. In addition, a decision not to publish the Proposed MTS Revision would represent a missed opportunity to refresh the MTS and to provide a clear policy foundation for the future development of RUC in London.

## **6.2. Recommendation**

- 6.2.1. It is recommended that some modifications are made to the Proposed MTS Revision.

- 6.2.2. A minor update to the narrative under the heading 'Toxic air pollution' is recommended which would reflect more recent data on the impact of the expansion of ULEZ on compliance with vehicle emissions standards. Currently the text refers to an increase of 92 per cent a month after implementation; this would be replaced with text referring to 94 per cent six months after implementation.

- 6.2.3. It is also recommended that a minor modification to the narrative under the heading 'Climate Emergency' is made for the purposes of clarity. In this section, the Mayor's preferred pathway to net zero in London by 2030 is described and the section concludes:

*However there is more to be done including taking action to reduce vehicle kilometres travelled on London's roads by 27 per cent by 2030.*

- 6.2.4. This is a reference to the Accelerated Green scenario in the Element Energy report<sup>62</sup>, which the Mayor then announced was his preferred pathway.<sup>63</sup> In both the report and the press release, this is stated as a 27 per cent reduction in car vehicle kilometres. For consistency and clarity, it is recommended that this sentence is modified to reflect the wording used in the report and the Mayor's announcement on 4 March 2022. This would modify the final sentence of the Climate Emergency section of the narrative as follows:

*However there is more to be done including taking action to reduce car vehicle kilometres travelled on London's roads by 27 per cent by 2030.*

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<sup>62</sup> Analysis of a Net Zero 2030 Target for Greater London, Element Energy, 2022  
[https://www.london.gov.uk/sites/default/files/nz2030\\_element\\_energy\\_final.pdf](https://www.london.gov.uk/sites/default/files/nz2030_element_energy_final.pdf)

<sup>63</sup> Mayoral press release 18 January 2022 <https://www.london.gov.uk/press-releases/mayoral/mayor-announces-bold-plans-for-a-greener-london>

- 6.2.5. It is also proposed that an update is made to the text under the heading 'Traffic Congestion'. This update is to reflect more recent or fuller information with regard to the initial impacts of the inner London ULEZ in terms of vehicle reduction. This modification would replace the current paragraph which refers to initial indications being an 11,000 reduction in vehicles, which comes from an earlier report (the ULEZ first month report of December 2021). More recent data is now available, as follows:

*The inner London ULEZ has only been in operation since October 2021 but early indications suggest it has contributed to a reduction of around 21,000 vehicles<sup>64</sup> (around two per cent) in the expanded zone on an average day compared to the month before the launch of the scheme.*

- 6.2.6. It is also recommended that additional text is added as follows:

*Proposals for any new or amended RUC schemes would need to be introduced in accordance with statutory procedure, including consultation requirements.*

This is to address concerns expressed by some consultation respondents that proposals for new or amended RUC schemes need to be consulted on. The requirement for consultation stems from mayoral guidance issued pursuant to Schedule 23 so this insertion would simply reiterate that the statutory procedure would be followed and that this is likely to require consultation.

- 6.2.7. No modification to the text of Proposal 24.1 itself is recommended.
- 6.2.8. A marked-up version of the Proposed MTS Revision showing all of the suggested modifications is at Appendix A2.
- 6.2.9. It is recommended that the Mayor publishes the Proposed MTS Revision in the form in which it was consulted on with the minor modifications described above. As explained previously, the Mayor's decision would be made subject to the updated version of the revision being laid before the London Assembly prior to publication and the London Assembly not resolving to reject it.
- 6.2.10. If the Mayor accepts this recommendation and the revision is published, TfL will undertake the required post-publication tasks including publicising publication of the revision to stakeholders and the public and publishing a post-adoption statement in respect of the environmental aspects.

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[https://www.london.gov.uk/sites/default/files/expanded\\_ultra\\_low\\_emission\\_zone\\_six\\_month\\_report.pdf](https://www.london.gov.uk/sites/default/files/expanded_ultra_low_emission_zone_six_month_report.pdf)



**Appendix A1: Draft MTS Revision Addendum as consulted on**

**Appendix A2: Proposed MTS Revision Addendum with proposed modifications marked up**

**Appendix B: AECOM Consultation Analysis report**

**Appendix C: Integrated Impact Assessment for the proposed MTS Revision**

**Appendix D: Habitats Regulation Assessment**

**Appendix E: Marketing materials**

**Appendix F: List of stakeholders contacted and list of meetings with stakeholders**

**Appendix G: Code frame used by AECOM**

**Appendix H: Consultation Overview document**