

Report to the Mayor: Our proposals to help improve air quality, tackle the climate emergency, and reduce congestion by expanding the ULEZ London-wide and other measures (scheme consultation)

November 2022

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Appendix N: TfL London Wide ULEZ Final DPIA November 2022

1. Introduction

1.1. Purpose of this document

- 1.1.1. Transport for London (TfL) developed consultation proposals, including proposals to amend the Ultra Low Emission Zone (ULEZ) and Congestion Charge schemes (referred to as the “scheme proposals”) to help improve air quality, tackle climate change, and reduce traffic congestion:
- expanding the Ultra Low Emission Zone (ULEZ) scheme to outer London so that it would operate London-wide from 29 August 2023 including the proposed extension of certain existing time-limited exemptions (known as “grace period”): “Proposal 1”;
 - removing the annual £10 per vehicle Auto Pay (including Fleet Auto Pay) registration fee (or administration fee) for the Congestion Charge (CC), ULEZ and Low Emission Zone (LEZ): “Proposal 2”;
 - increasing the Penalty Charge Notice level from £160 to £180 for non-payment of the CC and ULEZ daily charges: “Proposal 3”; and
 - minor administrative changes to the LEZ-ULEZ and CC Scheme Orders: “Proposal 4”; and

Consultees were also asked for their views on shaping the future of road user charging (“Future RUC”) in London.

- 1.1.2. The public and stakeholders were invited to give their views on the above matters in a consultation held over a ten-week period between 20 May 2022 and 29 July 2022 (“the consultation”).
- 1.1.3. The consultation also included the proposal to revise the Mayor’s Transport Strategy (MTS) to facilitate any future expansion of the ULEZ to outer London and set out the triple challenges of air pollution, climate change and traffic congestion. Consultation responses to the proposed MTS Revision are reported and analysed in a separate report which can be found [here](#). The Mayor’s decision on the MTS revision, which is a necessary precursor to his decision on the scheme proposals, can be found [here](#).
- 1.1.4. Alongside the public consultation, the Greater London Authority (GLA) commissioned a poll to understand Londoners’ views on the proposals. The survey was carried out by YouGov between 15th and 20th July 2022 with 1,245 responses which have been weighted to be representative of all London adults.
- 1.1.5. This report primarily concerns the scheme proposals and views on shaping the future of road user charging. It describes how the consultation was carried out, summarises and provides analysis of the consultation responses, and makes recommendations to the Mayor in response to the issues raised by the public and stakeholders. It should be read in conjunction with the consultation materials¹ (described in Chapter 3), which contain more details of the proposals and how they were developed, as well as information

¹ <https://haveyoursay.tfl.gov.uk/cleanair>

about their likely impacts and other relevant matters. Particular attention should be given to the information document in Appendix A (*Our proposals to help improve air quality, tackle the climate emergency, and reduce congestion by expanding the ULEZ London-wide and other measures*) that was published as part of the consultation materials.

1.2. Purpose of consultation

- 1.2.1. The purpose of the consultation was to obtain the views of the public and stakeholders on the proposals. It gave the public and stakeholders the opportunity to comment and provide feedback. They were also given the opportunity to comment on what elements should be considered as part of future road user charging in London.
- 1.2.2. After the consultation closed, we prepared a report to the Mayor (this document) on the consultation responses received (including any late responses) for his consideration. It contains recommendations about whether the scheme proposals should proceed and, if they do, whether they should be modified in light of issues raised. This report also includes other relevant matters the Mayor should consider when deciding whether or not to confirm the scheme proposals, with or without modifications.
- 1.2.3. This report also includes responses to questions relating to views on shaping the future of road user charging. This work is at a formative stage. We are not consulting on any specific future road user charging scheme at this stage. Comments received on shaping the future of road user charging will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.

1.3. Structure of report

- 1.3.1. 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 proposals are made to modify a road user charging scheme.

Chapter 2: Proposed changes consulted on – A summary of the proposals and the impact in the zone.

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

Chapter 4: Consultation responses – The feedback received, 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.

1.3.2. This report also has appendices setting out other relevant information for consideration.

1.3.3. The individual consultation responses have been made available to the Mayor for his consideration.²

1.4. Triple challenges: air pollution, the climate emergency, traffic congestion

1.4.1. The MTS, published in 2018, sets out the Mayor's vision to create a fairer, greener, healthier, and more prosperous London. 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.

1.4.2. This will support "Good Growth", which works to re-balance development in London towards more genuinely affordable homes, reduce car dependency and create a more sustainable and socially integrated city. Achieving the aims of the MTS must start with an ambitious approach to London's streets, where the majority of travel takes place.³

1.4.3. Recently it has become increasingly apparent that we face three major challenges in London ("the Triple Challenges"):

- While we have seen significant progress in reducing harmful **air pollution** over the past decade, we know that we need to go further to protect human health;
- a **climate emergency**, and that the impacts of rising temperatures and extreme weather can affect us all; and
- we have also seen **traffic congestion** return as London returns to business as usual after the pandemic with costs to the economy and our quality of life.⁴

Air pollution

1.4.4. Air pollution has a negative impact on the health of all Londoners and remains at illegal levels in some areas. It has a disproportionate impact on more vulnerable and deprived people.⁵ The two pollutants causing the greatest concern, based on their impact on human health and death, are:

- Nitrogen dioxide (NO₂): Nitrogen oxides (NO_x) are a group of gases (NO and NO₂) that are mainly formed during the combustion of fossil fuels. NO₂ is the main pollutant of concern and at high concentrations causes inflammation of the airways. Long-term exposure is associated with an

² Responses from members of the public have had personal data removed. Unless otherwise instructed, responses from stakeholders have been passed on in full.

³ [The Mayor's Transport Strategy pg. 36 \(2018\)](#)

⁴ [Travel in London Report 14, TfL \(2021\)](#)

⁵ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>

increase in symptoms of bronchitis in asthmatic children and reduced lung development and function.

- Particulate matter (PM): Long-term exposure contributes to the risk of developing cardiovascular and respiratory diseases, including lung cancer. Research shows that particles with a diameter of 10 microns and smaller (PM₁₀) are likely to be inhaled deep into the respiratory tract. The health impacts of particles with a diameter of 2.5 microns or smaller (PM_{2.5}) are especially significant as smaller particles can penetrate even deeper.⁶

1.4.5. The Mayor has a duty to achieve the legal limits for air pollutants in Greater London. Limit values for NO₂, PM₁₀ and PM_{2.5} are set in the Air Quality (Standards) Regulation 2010⁷ as shown in Tables 1-3.

Table 1: Limit values (NO₂)

Averaging period	Limit value
One hour	200 µg/m ³ not to be exceeded more than 18 times a calendar year
Calendar year	40 µg/m ³

Table 2: Limit values (PM₁₀)

Averaging period	Limit value
One day	50 µg/m ³ , not to be exceeded more than 35 times a calendar year
Calendar year	40 µg/m ³

Table 3: Limit value (PM_{2.5})

Averaging period	Limit value
Calendar year	20 µg/m ³

1.4.6. The London Zone⁸ has been in exceedance of annual mean limit value for NO₂ since 2010 and continues to be so. The zone does however meet the hourly mean limit value for NO₂. London is compliant with both the annual mean and the daily mean limit value for PM₁₀. All London residents live in areas that meet the legal limit value for PM_{2.5}.

⁶ [https://www.who.int/en/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/en/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

⁷ These limit values are the same as the air quality objectives prescribed by the Air Quality (England) Regulations 2000 (SI 2000 No. 928) made under section 87(2)(a) and (b) of the Environment Act 1995

⁸ London Zone in this context is the Greater London Urban zone as defined by Defra for the purposes of reporting on air quality compliance. This covers a wider area than the GLA and extends in some parts beyond the LAEI boundary: <https://compliance-data.defra.gov.uk/datasets/Defra::nitrogen-dioxide-hourly-mean-zone-agglomeration-2021/explore?location=51.369587%2C-0.289017%2C11.46>

- 1.4.7. Even where limit values have been achieved, the Mayor must still ensure that (a) the levels of those pollutants are maintained below the applicable limit values and (b) endeavour to maintain the best ambient air quality compatible with sustainable development. This may involve taking steps to secure levels of pollution that are below the limit values currently set out in law.
- 1.4.8. In September 2021, the World Health Organization (WHO) updated its recommended guidelines for air pollutants reflecting its assessment of the overwhelming evidence of the adverse health impacts of air pollution, even at low levels. In addition to the guidelines, the WHO has also provided interim targets aimed at achieving a gradual shift from relatively higher to lower concentrations in locations where air pollution is particularly high. The WHO recommended guidelines and interim targets are as shown in Table 4.⁹

Table 4: Recommended WHO 2021 air quality guideline levels and interim targets compared to UK limits – all annual average

Pollutant	UK 2010 Air Quality Limits	WHO Interim target*				2021 WHO Air Quality Guideline
		1	2	3	4	
PM _{2.5} µg/m ³	20	35	25	15	10	5
PM ₁₀ µg/m ³	40	70	50	30	20	15
NO ₂ µg/m ³	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

- 1.4.9. The WHO guidelines and progressive interim targets are significantly more stringent than current limit values but they represent levels of pollution that the Mayor considers are appropriate for him to pursue (even where current statutory limit values are met) in order to continue to improve air quality for Londoners.
- 1.4.10. Based on air quality modelling undertaken as part of the London Atmospheric Emissions Inventory (LAEI) there has been a significant reduction in the number of London residents who live in areas which exceed the UK legal limits (40 µg/m³) for NO₂ since 2016, with fewer than two per cent of Londoners (around 170,000) living in areas of exceedance in 2019. However, almost a third of London residents live in areas which exceed 30

⁹ [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)

$\mu\text{g}/\text{m}^3$, the level 2 interim target set by the WHO, and all Londoners live in areas which exceed the guideline limit of $5 \mu\text{g}/\text{m}^3$.¹⁰

- 1.4.11. All London residents live in areas that are within the current statutory PM_{2.5} UK limits. However, more needs to be done to reduce the significant number of Londoners who live in areas exceeding the lowest WHO interim target of $10 \mu\text{g}/\text{m}^3$ and the even lower guideline of $5 \mu\text{g}/\text{m}^3$. 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 ($10 \mu\text{g}/\text{m}^3$), and all Londoners live in locations where concentrations exceed the WHO guideline of $5 \mu\text{g}/\text{m}^3$.¹¹
- 1.4.12. Air pollution has a continuing and serious adverse impact on the health and lives of thousands of Londoners. In these circumstances the Mayor can choose to pursue more exacting standards than the statutory upper limits set out in current legislation, such as the WHO interim targets and guidelines as an appropriate approach to achieving the best ambient air quality in London compatible with sustainable development.
- 1.4.13. In 2020, TfL and the GLA commissioned researchers from the Environment Research Group (ERG) at Imperial College London to assess the impact on health and air pollution in London of the Mayor's air quality policies, using current (2019) and future levels of air pollution up to 2050 (projected from 2013). Their 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 lost¹²) were estimated to be attributable to PM_{2.5} and NO₂.
- 1.4.14. A 2020 study (*Modelling the long-term health impacts of changing exposure to NO₂ and PM_{2.5} in London*) found that if no action is taken to reduce current levels of pollution, by 2050 the number of new diseases attributable to exposure to man-made NO₂ and PM_{2.5} in London is estimated to be 850,000. The cumulative cost of air pollution to the NHS would be £15.4 billion. The policies in the London Environment Strategy (LES), including the existing ULEZ, are predicted to result in the avoidance of around 300,000 new cases of NO₂ and PM_{2.5} related disease and 1.2 million new air pollution related hospital admissions London-wide by 2050. This equates to a cost saving to the NHS and social care system of £5 billion. However, if no further action beyond the policies in the LES is taken to reduce air pollution, it is estimated that around 550,000 Londoners will develop diseases related to poor air quality by 2050. In this case the cost to the NHS and social care system in London is estimated to be £10.4 billion by 2050.¹³ The greatest number of

¹⁰ LAEI <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

¹¹ LAEI <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

¹² 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

¹³ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/modelling-long-term-health-impacts-air-pollution-london>

deaths related to air pollution¹⁴ 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.¹⁵ This is because lung function declines with age and older people are more likely to have co-morbidities (more than one illness or disease occurring in one person at the same time). Children are also more vulnerable to breathing in polluted air as their airways are still developing and they breathe more rapidly than adults.

Climate emergency

1.4.15. In 2020, the Mayor brought forward his ambition for a net zero carbon London¹⁶ to 2030 in recognition of the scale of the climate emergency. 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.¹⁷

1.4.16. In addition, a recent report commissioned by the Mayor found that in order to achieve net zero carbon in London by 2030, car vehicle kilometres need to reduce by at least 27 per cent in London by the end of the decade under his preferred pathway.¹⁸

Traffic congestion

1.4.17. Last year, the cost of traffic congestion in London was estimated at £5.1 billion with the average driver losing 148 hours to congestion per year.¹⁹ Congestion delays vital bus services (discouraging passengers to shift to bus usage), disrupts essential freight and servicing trips, makes public spaces unpleasant for walking and cycling, and worsens air pollution.

1.5. Changes to ULEZ and other measures

1.5.1. TfL is the charging authority for the ULEZ, LEZ and CC road user charging schemes. The rules of a road user charging scheme are contained in an order made by TfL called a "scheme order" which defines the charging zone, any applicable vehicle emission standards (relevant to the ULEZ and LEZ), when liability to pay the charge arises if a vehicle is driven within the applicable zone, the level of the applicable daily charge and the discounts and exemptions that apply. The scheme order also includes any

¹⁴ Note that this is not a direct causative relationship at the individual level; it is a collective statistical impact across the population

¹⁵ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/health-burden-air-pollution-london>

¹⁶ Where the amount of carbon we produce is no more than the amount taken away

¹⁷ https://www.ipcc.ch/report/ar6/wg2/downloads/report/IPCC_AR6_WGII_SummaryForPolicymakers.pdf

¹⁸ https://www.london.gov.uk/sites/default/files/nz2030_element_energy_final.pdf. The Mayor's preferred pathway is the 'accelerated green' scenario

¹⁹ <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.

administrative matters such as procedures and fees for applying for discounts and exemptions and applicable fees etc.

- 1.5.2. Changes to rules of a road user charging scheme are contained in an order called a “variation order”. (Where proposals involve changes to more than one scheme order then a variation order is prepared for each.) Variation orders do not take effect unless and until confirmed by the Mayor, with or without modifications. In accordance with Mayoral guidance a public and stakeholder consultation is normally carried out on the proposed changes set out in the variation order(s). After the consultation closes TfL prepares a report to the Mayor on the consultation responses (this Report) and makes recommendations about whether the proposals should proceed in their original (consulted-on) form or be modified in light of responses or other relevant issues. The Mayor’s confirmation of the consultation proposals involves his formal confirmation of the variation order(s), with or without modifications.
- 1.5.3. The process for making changes to a road user charging scheme is set out in Schedule 23. Changes to the current rules of the scheme must be contained in an order called a “variation order” which, if confirmed by the Mayor (with or without modifications), will amend the scheme order and, therefore, implement the changes in the scheme rules. In accordance with Mayoral guidance a public and stakeholder consultation is carried out on the proposed changes unless exceptional circumstances apply. TfL prepares a report to the Mayor on the consultation responses and any proposed recommendations about the consultation proposals including whether they should proceed in their original consulted-on form or be modified in light of issues raised in the consultation. The Mayor’s confirmation of the consultation proposals also involves formal confirmation of the variation order in order to implement the changes at a scheme level. This is done by the execution of an instrument of confirmation (this includes a schedule of modifications if the Mayor’s approval requires them).
- 1.5.4. The Scheme Proposals involve changes to the ULEZ, LEZ and CC schemes.
- Proposal 1 affects the ULEZ and Proposals 2, 3 and 4 affect both the ULEZ and LEZ. The London Emissions Zones Charging Scheme Order (“the LEZ-ULEZ Scheme Order”) is the scheme order governing the LEZ and ULEZ²⁰. The consultation materials included a draft of a variation order to make changes to that order, called the “Greater London Low Emission Zone Charging (Variation and Transitional Provisions) Order 2022” (the “*LEZ-ULEZ Variation Order*”). It is intended that TfL will formally make this variation order in the form consulted upon before submitting it to the Mayor.
 - Proposals 2 to 4 also involve changes to the rules of the Congestion Charge’s scheme order. On 16 May 2022 TfL made the Greater

²⁰ This is the London Low Emission Zone Charging Order 2006 (as amended). The London Emissions Zones Charging Scheme is a schedule to that Order.

London (Central Zone) Congestion Charging (Variation) Order 2022 (the “*Congestion Charge Variation Order*”). This variation order was also included in the consultation materials.

- 1.5.5. The two variation orders will be submitted by TfL to the Mayor to decide whether or not they should be confirmed, with or without modifications. The Mayor will consider this Report alongside other relevant matters when making that decision.

1.6. Shaping the future of road user charging

- 1.6.1. Experts have found that London will need a new kind of road user charging system by the end of the decade, alongside other measures, to achieve net zero carbon by 2030 and address air pollution and traffic congestion.²¹ This could replace existing road user charging, such as the Congestion Charge, ULEZ and LEZ, with a simple and fair scheme for customers. The Mayor has asked TfL to start exploring how this concept could be developed, while acknowledging that it is still some years away from being ready to implement such a scheme.

²¹ https://www.london.gov.uk/sites/default/files/nz2030_element_energy_final.pdf

2. Proposed changes consulted on

2.1. Introduction

2.1.1. This section provides an overview of the consultation proposals, how they were developed and how they are intended to operate. More detail is provided in the information document that was published as part of the consultation materials in Appendix A.

2.2. History of the Ultra Low Emission Zone

2.2.1. On 8 April 2019, the Mayor launched the world's first ULEZ in central London, replacing the Toxicity Charge (a £10 supplement to the Congestion Charge) with tighter vehicle emission standards and operating 24 hours a day and seven days a week (except on Christmas Day). The ULEZ in central London applied to the same area as the Congestion Charge Zone.

2.2.2. Under the ULEZ scheme "light vehicles" - cars, motorcycles, vans and other specialist vehicles (up to and including 3.5 tonnes) and minibuses (up to and including 5 tonnes) - must meet the following minimum exhaust emission standards to travel within the zone or they are required to pay a daily ULEZ charge of £12.50:

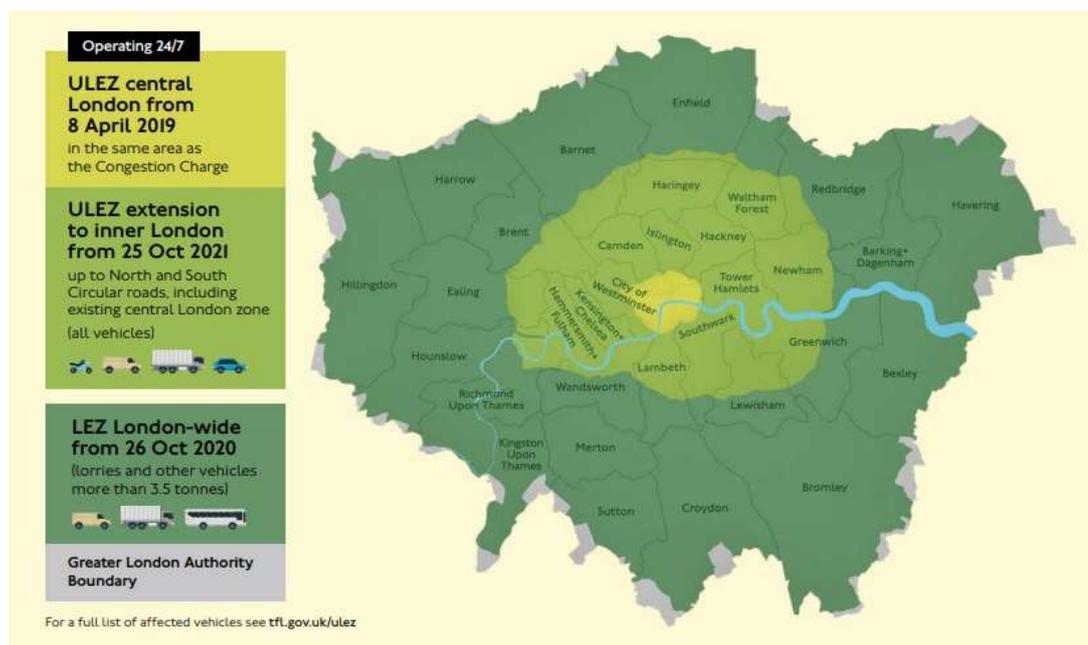
- Euro 3 (NO_x) for motorcycles, mopeds, motorised tricycles and quadricycles.
- Euro 4 (NO_x) for petrol cars, vans and other specialist vehicles, up to and including 3.5 tonnes gross vehicle weight (GVW) and minibuses, up to and including 5 tonnes GVW.
- Euro 6 (NO_x and PM) for diesel cars, vans and other specialist vehicles, up to and including 3.5 tonnes GVW and minibuses, up to and including 5 tonnes GVW.

2.2.3. At the launch of the ULEZ in central London "heavy vehicles" - HGVs, vans and specialist heavy vehicles over 3.5 tonnes gross vehicle weight (GVW), as well as buses, coaches and minibuses over 5 tonnes GVW - were required to meet Euro VI (NO_x and PM).

2.2.4. On 1 March 2021, the ULEZ standards for heavy vehicles were incorporated into the London-wide Low Emission Zone (LEZ). The daily LEZ charge for non-compliant vehicles ranges from £100 to £300 depending on what Euro standard they meet.

2.2.5. On 25 October 2021, the Mayor expanded the ULEZ up to, but not including, the North and South Circular Roads, including the original central London area. The zone is 18 times larger than before with nearly four million people living in the zone. Measuring 380km², it covers one quarter of London and is the largest zone of its kind in Europe. A map of the current ULEZ is shown in Figure 1.

Figure 1: Map of the Low Emission Zone (LEZ) and ULEZ boundaries



2.3. Summary of the consultation proposals (proposed ULEZ expansion and other measures)

- 2.3.1. Currently, only the London LEZ for heavy vehicles applies London-wide, covering nearly 96 per cent of the Greater London administrative area. The ULEZ for light vehicles applies in central and inner London.
- 2.3.2. The tightening of LEZ standards for heavy vehicles to match the ULEZ standards from March 2021, and the October 2021 expansion of the ULEZ to inner London have contributed to reducing transport emissions to protect the health of Londoners. However, air quality remains a challenge, including in outer London. In September 2021, the World Health Organization (WHO) updated its recommended guidelines for air pollutants²² reflecting its assessment of the overwhelming evidence of the adverse health impacts of air pollution, even at low levels (that are consistent with current statutory standards in the United Kingdom).
- 2.3.3. In 2019, there were around 4,000 premature deaths in London related to air pollution. The greatest number of those premature deaths were in London's outer boroughs, where the ULEZ doesn't currently apply. This is because even though pollution is lower in the outer boroughs, there is a higher proportion of older people in these areas, who are more vulnerable to the impacts of air pollution.²³ Over 500,000 Londoners suffer from asthma and are vulnerable to the effects of highly polluted air, with more than half of

²² [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)

²³ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/health-burden-air-pollution-london>

these people living in outer London. There has also been a slower rate of improvement in air quality in outer London than in central and inner London.²⁴

- 2.3.4. Proposal 1 of the scheme proposals is expanding the current ULEZ to the LEZ boundary on 29 August 2023. The LEZ boundary has proven to be an effective boundary for the LEZ scheme, has existing signage which could be adapted, and would provide drivers with appropriate routes to avoid entering the zone if they do not comply with ULEZ emissions standards.
- 2.3.5. The proposed expansion is intended to improve air quality in outer London by encouraging individuals to use sustainable transport or switch to cleaner vehicles, thereby contributing to the reduction in the number of older, more polluting vehicles used in London. It will also contribute towards reducing carbon emissions and traffic congestion. All revenue raised from charges that is not spent on implementation and operational costs would be reinvested to help deliver the MTS including in outer London.
- 2.3.6. Proposal 1 also included extending the existing “grace periods” which are the temporary period when certain non-compliant vehicles can drive without incurring the ULEZ daily charge.
- 2.3.7. In line with the previous iterations of the ULEZ scheme, the consultation proposed to extend the grace periods for ‘disabled’ and ‘disabled passenger’ tax class vehicles, wheelchair accessible PHVs and minibuses used for community transport by two years. These grace periods currently apply within inner London and would apply London-wide on the following basis:
- ‘disabled’ and ‘disabled passenger’ tax class vehicles extended from 26 October 2025 to 24 October 2027.
 - wheelchair accessible PHVs, for TfL licenced PHVs, extended from 26 October 2025 to 24 October 2027.
 - minibuses used for community transport extended from 29 October 2023 to 26 October 2025.

Some of the potential adverse impacts of Proposal 1 are expected to be mitigated through the new large-scale and targeted vehicle scrappage scheme to support Londoners being developed by TfL.

- 2.3.8. Proposal 2 is to remove the £10 annual registration fee for each vehicle registered for Auto Pay²⁵ (including Fleet Auto Pay²⁶) for the Congestion Charge, ULEZ and LEZ, to help remove a barrier to people signing up to Auto Pay. This change is proposed to take place on 30 January 2023.

²⁴ <https://www.london.gov.uk/press-releases/mayoral/toxic-air-reducing-far-more-slowly-in-outer-london>

²⁵ Auto Pay allows owners to set up an account so they automatically pay the relevant charge and so will not incur a penalty for non-payment.

²⁶ Fleet Auto Pay is available to businesses with six or more vehicles.

- 2.3.9. Proposal 3 is to increase the penalty charge notice (PCN) level for the ULEZ and Congestion Charge from £160 to £180 from 30 January 2023. Due to a number of factors such as inflation, increases in public transport fares, and the level of the Congestion Charge itself²⁷ reducing the relative disbenefit of the penalty charge, the deterrent effect of receiving a PCN over time has decreased.
- 2.3.10. We also proposed making minor administrative changes to the Congestion Charge and Low Emission Zone Scheme Orders (Proposal 4) to increase flexibility or, for example, where certain provisions have expired and should be removed:
- Remove reference to being able to purchase a licence for a specified period of days (seven, 31 or 365 charging days) for those liable to pay the full charge and replace with ‘a licence for consecutive charging days’ not referencing the specified period of days
 - Remove reference to specific payment channels in the Scheme Orders and replace with ‘by any payment channel provided by TfL’
 - Remove reference to specific payment method in the Scheme Orders and replace with ‘by any payment method accepted by TfL’
 - Remove reference to specific communication channels in the Scheme Order and replace with ‘by any communications channel provided by TfL’
- 2.3.11. To ensure the MTS and the proposal to expand the ULEZ London-wide are in alignment, it was necessary to revise the MTS to add a supplementary proposal to the existing Proposal 24. This is set out in paragraph 24.1:

Proposal 24.1: 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.

Proposal 24.1 is accompanied by a narrative which describes each of the three challenges and why it is important that they are addressed. The full text of the adopted MTS revision is set out in a separate document on the GLA website. The revision was published as an addendum to the 2018 MTS on 18 November 2022 and adopted by the Mayor on this date.

2.4. Integrated Impact Assessment

- 2.4.1. We commissioned consultants Jacobs to undertake an Integrated Impact Assessment (IIA), including an equality impact assessment, of the likely impacts of proposed changes to the ULEZ (Proposals 1 to 3 as relevant to the ULEZ). The IIA identified the expected impact of the proposals on a range of themes and groups (below), this included a range of negative impacts (ranging from minor to moderate), alongside positive or beneficial impacts. Each assessment identifies impacts against the relevant IIA

²⁷ The Congestion Charge was increased from £11.50 to £15 as part of the package of temporary changes which were introduced on 22 June 2021 in response to the transport challenges of the Covid-19 pandemic. This increase was introduced as a permanent change on 20 December 2021.

objectives as short-term and medium-term. Long-term was considered not applicable on the assumption that the Mayor is investigating how TfL could replace ULEZ and other schemes with a single, integrated road user charging scheme within this timeframe. Also in the longer term, it is expected that there would be almost total compliance with the scheme. In addition to duration, impacts were determined against two assessment parameters: breadth (scale and distribution of positive and negative impacts) and sensitivity (e.g. of people, environmental assets or economic sectors to identified impacts). The impact rating was assessed taking account of mitigation measures committed to by TfL, such as the exemptions, discounts and reimbursements, as originally proposed in the consultation materials. The IIA formed part of the consultation materials, and is included as Appendix C of this report. Responses to issues raised by consultees and stakeholders as part of the consultation can be found in section 5.

2.4.2. The IIA was set out under the themes of London's environment, London's people (including health and equality assessments) and London's economy. A summary of its key findings is as follows:

Environmental impacts

- Medium-term moderate (NO_x) to minor (PM₁₀ and PM_{2.5}) beneficial impact on road traffic emissions of air pollutants across Greater London.
- Medium-term minor (NO₂) to negligible (PM_{2.5}) beneficial impact on exposure to air pollution and achieving WHO Interim Targets²⁸ across Greater London.
- Medium-term minor beneficial impact on compliance with legal limits across Greater London.
- Negligible beneficial impact on carbon emissions in Greater London.
- Negligible beneficial impact on nature conservation sites from decreases in NO_x concentrations.
- Medium-term minor positive impact on cultural heritage assets from reduced risk of acid rain in London as a result of NO_x reductions.
- Neutral impact from reductions in PM emissions on the soiling of historic buildings.
- Neutral impact on waste management due to anticipated additional tonnage of vehicles scrapped.
- Neutral impact on fly-tipping in those parts of outer London which would not fall within the London-wide ULEZ boundary.
- Short-to-medium term localised minor landscape negative impacts of new street furniture in some rural areas.
- Neutral impact on the built environment or streetscape within urban/suburban areas of outer London as a result of the installation of new street furniture.

²⁸ The WHO Interim targets and descriptions are set out in section 5.1.2 of the ULEZ Scheme IIA (Appendix C of this report)

People impacts (impacts and mitigations concerning groups with protected characteristics are summarised in section 2.5)

- Short-to-medium term improvements to air quality, resulting in better health outcomes for all Londoners.
- Neutral impact on health outcomes for vulnerable populations expected as a result of reduced Urban Heat Island effects.
- Short-to-medium term minor negative community severance impacts for people living in communities adjacent to the London-wide ULEZ boundary who are required to travel into outer London by non-compliant vehicle to access employment, services and facilities.
- Short-to-medium term disproportionate moderate negative impact on people with restricted mobility including parents with young children, who travel by non-compliant private vehicle in outer London to access employment (particularly in the night-time economy) or opportunities, due to their lesser capacity to switch to a compliant vehicle and/or change mode.
- Short-to-medium term moderate negative impact on care workers serving the outer London area, who rely on using a non-compliant vehicle to provide care, where employers do not reimburse care workers for upgrading their vehicle or paying the charge.

Economic and Business impacts

- Medium-term minor negative impacts on localised labour markets due to fewer people entering Greater London with a short-term minor negative impact on the labour market at Heathrow Airport.
- Medium-term minor negative impact for a significant proportion of tradespeople, street markets, delivery companies and similar due to increased cost of operating LGVs.
- Neutral impact on taxi and PHVs licensed outside London.
- Short-term minor negative impact on London's town centres from a loss of retail spend by those living outside Greater London.
- Neutral impact from loss of night-time economy spend by those living outside Greater London.

2.4.3. It should be noted that although the technical assessment of emissions reductions is in some cases minor to negligible, it is also important to understand the impact of this policy in absolute terms. For example, although NO₂ concentration reductions are smaller in percentage terms than for the central London ULEZ, in absolute terms there is a much larger volume of NO_x emissions saved. Similarly, although the impact on carbon emissions is assessed as negligible, this equates to a saving of 27,000 tonnes of CO₂ saved in outer London, which is a comparatively larger saving than we have seen with other similar policy interventions. It is nearly double that which the central London ULEZ achieved in its first year of operation.

2.4.4. The ULEZ Scheme IIA also considered the likely cumulative impacts for each theme (people, economy and environment) from other RUC schemes (in operation or with formal approval to proceed) in combination with the

proposed expansion of the ULEZ London-wide. The following schemes were considered: the Congestion Charge, current ULEZ, the LEZ, Silvertown Tunnel and the Heathrow drop off charge. The IIA concluded it was not considered that any cumulative impacts are likely to result from the implementation of the proposed scheme alongside other existing or planned road user charging schemes. The responses to the consultation are considered in Chapter 5 of this report.

2.5. Protected characteristics and equalities

- 2.5.1. Under section 149 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.
- 2.5.2. The Public Sector Equality Duty applies to the Mayor's decision about whether to proceed to implement the Scheme Proposals by confirming the two Variation Orders with or without modifications.
- 2.5.3. In the ULEZ Scheme IIA, the 'People' category includes an assessment of groups of persons that share protected characteristics ('protected characteristic groups'). This assessment is summarised below. Informed by the IIA and discussions with key stakeholders following the consultation, we have identified some modifications to the original Scheme Proposals. These are also outlined below.

Age

- 2.5.4. The ULEZ Scheme IIA identified improvements to air quality resulting in short-to-medium term disproportionately greater health benefits for older people and children and differential²⁹ benefits for older people and children living in outer London.
- 2.5.5. The IIA identified a short-to-medium term differential minor negative impact on young people attending SEN schools in outer London who travel by non-

²⁹ A differential equality effect is one which affects members of a protected group differently from the rest of the general population because of specific needs or a recognised sensitivity or vulnerability associated with their protected characteristic.

compliant private minibus/car, and their carers or families on low incomes. It identified a short-term differential minor negative impact on perceptions of safety for young people who travel by non-compliant vehicle but cannot afford to upgrade to a compliant vehicle. This group may be reluctant to use public transport due to perceptions of the risk to personal safety, and therefore may travel less.

- 2.5.6. The IIA identified a short-term differential moderate negative impact of increased cost for some older people who travel by non-compliant private vehicle to access regular medical appointments at specialist facilities in outer London (and outer London residents accessing healthcare outside London), which may result in adverse health outcomes for this group. Older people who receive domiciliary care, mobile healthcare services and/or informal care in outer London are likely to experience a short-to-medium term differential moderate negatively impact, resulting in poorer health outcomes. The IIA also identified a short-to-medium differential and disproportionate moderate negative impact on social exclusion and isolation for older people who rely on a non-compliant vehicle, which may result in poorer socio-economic and wellbeing outcomes.

Disability

- 2.5.7. The ULEZ Scheme IIA identified a neutral impact on disabled people travelling by car in outer London who qualify for the Motability scheme and the disabled vehicle tax exemption. The IIA identified a short-to-medium term differential moderate negative financial impact on disabled people who make journeys by non-compliant private vehicles and do not qualify for the Motability scheme and/or current disabled vehicle tax exemption from paying ULEZ charges. It also identified a short-to-medium moderate negative disproportionate financial impact on disabled people who travel by non-compliant private vehicle in outer London to access employment (particularly in the night-time economy) or opportunities and who do not have a disabled vehicle tax class, due to their lesser capacity to switch to a compliant vehicle and/or change mode.
- 2.5.8. The IIA identified a differential minor negative impact on disabled people attending SEN schools in outer London travelling by non-compliant private minibus/vehicle and their carers or families on lower incomes. The IIA identified a short-term differential minor negative impact on perceptions of safety for disabled people who travel by non-compliant private vehicle but cannot afford to upgrade to a compliant vehicle. This group may be reluctant to use public transport due to perceptions of the risk to personal safety, and therefore may travel less.
- 2.5.9. The IIA identified a short-term differential moderate negative impact of increased cost for some disabled people and people with underlying health conditions who travel by non-compliant private vehicle to access medical appointments at specialist facilities in outer London (and outer London residents accessing healthcare outside London), which may result in adverse health outcomes for this group. Disabled people and people with

underlying health conditions who receive domiciliary care, mobile healthcare services, and/or informal care in outer London are likely to experience a short-to-medium term differential moderate negative impact, resulting in poorer health outcomes.

- 2.5.10. A short-to-medium term differential minor negative impact was identified on disabled people who rely on services provided by charities and community organisations undertaking activities using non-compliant vans and minibuses within outer London.
- 2.5.11. The IIA identified a short-to-medium term differential moderate negative impact on stress and anxiety and a short-to-medium term differential and disproportionate moderate negative impact on social exclusion and isolation for disabled people who rely on a non-compliant vehicle and do not qualify for the disabled tax class vehicle exemption, which may result in poorer socio-economic and wellbeing outcomes.

Sex

- 2.5.12. The ULEZ Scheme IIA identified a short-term moderate negative impact due to the increased cost of operating light goods vehicles (LGVs) on tradespeople, likely to be disproportionately experienced by men, who rely on a non-compliant vehicle to undertake work in outer London. It also reported a short-term disproportionate minor negative impact on men working as private hire vehicle (PHV) drivers in outer London in a non-compliant vehicle³⁰, due to the higher representation of this protected group in the sector³¹.
- 2.5.13. The IIA identified a short-to-medium term disproportionate minor negative impact on women taking children to school in outer London in a non-compliant vehicle³². It also reported a short-to-medium term differential minor negative impact on women who rely on services provided by charities and community organisations undertaking activities using non-compliant vans and minibuses within outer London. In addition, the IIA identified a short-term differential minor negative impact on perceptions of safety for women who travel by non-compliant private vehicle but cannot afford to upgrade to a compliant vehicle. This group may be reluctant to use public transport due to perceptions of the risk to personal safety, and therefore may travel less.
- 2.5.14. The IIA identified a short-term differential minor negative impact for women who work for the NHS in lower paid positions³³ who travel by non-compliant private vehicle to access employment in outer London. Where employers do

³⁰ The IIA baseline report (Appendix J of this report) states London PHVs are currently 97 per cent compliant with ULEZ

³¹ The IIA baseline report (Appendix J of this report) states men make up 93 per cent of the taxi/PHV workforce

³² The IIA baseline report (Appendix J of this report) states women are three times more likely to take children to school than men

³³ The IIA baseline report (Appendix J of this report) states women make up 76.7 per cent of the total NHS workforce in England and are more likely to be in lower paid roles within the NHS with a lower average monthly basic pay than men.

not reimburse care workers for upgrading their vehicle or paying the charge, the IIA identified a short-to-medium term disproportionate moderate negative impact on women serving the outer London area, as a result of the additional cost associated with the scheme. This is likely to result in stress and anxiety.

Race

- 2.5.15. The ULEZ Scheme IIA identified a short-term disproportionate minor negative impact on Black, Asian and minority ethnic PHV drivers working in outer London in a non-compliant vehicle, due to the higher representation of this protected group in the sector. In addition, the IIA identified a short-term differential a minor negative impact on perceptions of safety for Black, Asian and minority ethnic people who travel by non-compliant private vehicle but cannot afford to upgrade to a compliant vehicle. This group may be reluctant to use public transport due to perceptions of the risk to personal safety, and therefore may travel less.
- 2.5.16. The IIA identified a short-term differential minor negative impact for Black, Asian and minority ethnic people who work for the NHS in lower paid positions³⁴ who travel by non-compliant private vehicle to access employment in outer London. Where employers do not reimburse care workers for upgrading their vehicle or paying the charge, the IIA identified a short-to-medium term disproportionate moderate negative impact on Black, Asian and minority ethnic people serving the outer London area as a result of the additional cost associated with the scheme. This is likely to result in stress and anxiety.
- 2.5.17. The IIA identified a short-term moderate negative impact due to the increased cost of operating LGVs on tradespeople, likely to be disproportionately experienced by members of the Gypsy and Traveller Community, who rely on a non-compliant vehicle to undertake work in outer London.

Pregnancy and maternity

- 2.5.18. The ULEZ Scheme IIA identified a short-to-medium term disproportionate moderate negative financial impact on pregnant women or new mothers/ parents with young children, who travel by non-compliant private vehicle in outer London to access employment or opportunities, who, due to their restricted mobility, may have less capacity to change mode. Pregnant women and new mothers/ parents with young children, who receive domiciliary care, mobile healthcare services and/or informal care in outer London, may also experience a short-to-medium term differential moderate negative impact resulting in poorer health outcomes.

³⁴ Black, Asian and minority ethnic people are more likely to be in lower paid position within the NHS workforce. Sources: <https://www.england.nhs.uk/london/our-work/equality-and-diversity/london-workforce-race-strategy/>; <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7563090/>

- 2.5.19. The IIA also identified a short-term differential minor negative impact of increased cost for some pregnant women or new mothers/ parents with young children who travel by non-compliant private vehicle to access medical appointments at paediatric/maternity centres in outer London, which may result in adverse health outcomes.

Religion or belief

- 2.5.20. The ULEZ Scheme IIA identified a short-to-medium term differential minor negative financial impact on some people of different faiths who access places of worship in outer London by non-compliant vehicle.

Gender reassignment

- 2.5.21. The ULEZ Scheme IIA identified a short-term differential minor negative impact on perceptions of safety for trans people who travel by non-compliant private vehicle but cannot afford to upgrade to a compliant vehicle. This group may be reluctant to use public transport due to perceptions of the risk to personal safety, and therefore may travel less.

Sexual Orientation

- 2.5.22. The ULEZ Scheme IIA identified a short-term differential minor negative impact on perceptions of safety for Lesbian, Gay, Bisexual and Transgender (LGBT+) people who travel by non-compliant private vehicle but cannot afford to upgrade to a compliant vehicle. This group may be reluctant to use public transport due to perceptions of the risk to personal safety, and therefore may travel less.

Other impacts

- 2.5.23. The ULEZ Scheme IIA identified other likely significant impacts relevant to protected characteristics. It noted there could be a short-to-medium term differential minor negative impact on refugees, asylum seekers and homeless people who rely on services provided by charities and community organisations undertaking activities using non-compliant vans and minibuses within outer London.

Deprivation

- 2.5.24. The ULEZ Scheme IIA identified impacts on people on low incomes. This included a short-to-medium term disproportionate moderate negative financial impact on people on low incomes travelling by non-compliant private vehicle in outer London to access employment (particularly in the night-time economy) or other opportunities, due to their lesser capacity to switch to a compliant vehicle. The IIA also identified a short-to-medium differential and disproportionate moderate negative impact on social exclusion and isolation for people on low incomes who rely on the use of a non-compliant private vehicle, which may result in poorer socio-economic and wellbeing outcomes.

- 2.5.25. The IIA noted a short-to-medium disproportionate minor negative impact on people on low incomes living in communities adjacent to the London-wide ULEZ boundary who are required to travel into outer London by non-compliant private vehicle to access employment, services and facilities.
- 2.5.26. A potential short-to-medium term differential minor negative impact on families on low incomes was identified due to implications around the increased cost of providing dedicated SEN travel to schools in outer London.

Recommended modifications and further mitigations

- 2.5.27. As set out in Section 6, we recommend to the Mayor modifications to the original Scheme Proposals and that further mitigations are implemented, noting that these are not likely to address all of the negative disproportionate impacts identified. Table 5 summarises these modifications and further mitigations according to the relevant protected characteristic group or vulnerable group identified as impacted by the ULEZ Scheme IIA.

Table 5: Summary of modifications and further mitigations

Modifications and mitigation measures	Relevant protected characteristic group / vulnerable group
We propose two new grace periods for those in receipt of disability related benefits and Wheelchair Accessible Vehicles, as outlined in paragraphs in Section 6.1, from 30 January 2023 until 24 October 2027.	Disabled people, carers (if nominated drivers of disabled people)

Modifications and mitigation measures	Relevant protected characteristic group / vulnerable group
A large scale and targeted scrappage scheme, as outlined in Section 6.1.	Older people; disable people; women; men; members of the Gypsy and Traveller Communities; Black, Asian and minority ethnic people; pregnant women and new mothers/ parents with young children; people on low incomes. In addition to people who directly benefit, there are those who are reliant on, or supported by, the work of charities with non-compliant vehicles who may indirectly benefit from the scrappage scheme. Those who may benefit include refugees, women, asylum seekers, homeless people and disabled people
We will continue to work with the NHS and relevant charities to help disseminate information about the existing NHS patient reimbursement scheme, engaging actively with any new organisations within the proposed expanded area.	Older people; disabled people; pregnant women; people on low incomes; people with underlying health conditions.
We will promote relevant schemes such as the Access to Work scheme when undertaking engagement with relevant stakeholders.	Disabled people
We will work with businesses and the freight industry to identify suitable sustainable alternatives.	Men; members of the Gypsy and Traveller Communities
We will continue to work with boroughs to support sustainable school travel. This includes the provision of concessionary fares for children and other measures such as School Streets.	Women (this will also benefit young people)
We will include discussion and awareness raising of schemes to help encourage sustainable commuting such as hospital Green Travel Plans when engaging NHS Trusts.	Women; Black, Asian and minority ethnic people

Modifications and mitigation measures	Relevant protected characteristic group / vulnerable group
We hold regular meetings and forums with all local authorities which would be used to engage with relevant stakeholders about ULEZ expansion London-wide should it be approved.	People on low incomes

2.5.28. In addition, TfL will monitor the impacts of the scheme, including the identified modifications and further mitigations, on protected characteristic groups and keep these under review. As part of this, TfL will continue to regularly engage with relevant stakeholders to ensure their concerns are considered and discussed.

2.6. Other Impact Assessments

2.6.1. Two further impact assessments were prepared for the consultation:

- (1) on the proposed changes to Auto Pay and Fleet Auto Pay (for Congestion Charge and LEZ³⁵) registration fees and to the increase PCN levels (Congestion Charge) (Appendix M of this report) and;
- (2) a (draft) Data Protection Impact assessment (DPIA).

2.6.2. Impact assessment (1) concluded that some groups of individuals who share protected characteristics would be adversely affected by the PCN level increase. The groups most likely to be affected are those where people are more likely to have a low income: older and younger people, people with disabilities, women and those in low-income households. However, the numbers affected are small in size, as some of these groups are less likely to own a car and, in any case, most drivers will meet ULEZ standards and do not drive in the Congestion Charge Zone, and of those that do, most do not receive PCNs. As a result, the assessed disproportionate negative impact on those groups would be limited in scale. There are also potential positive impacts on the same groups of persons who share protected characteristics from the proposals.

2.6.3. Specifically, the proposed removal of the £10 annual registration fee for Auto Pay would act as an effective mitigation of the adverse impacts of the PCN increase. Registering their vehicle(s) for Auto Pay will remove the possibility of a customer receiving a PCN and the associated cost; three-quarters of customers are already signed up to Auto Pay and the numbers would be expected to increase if the registration fee is removed.

2.6.4. There are also other scheme related mitigations which either alert drivers to the need to pay the daily charges (if they are not exempt or registered for a discount) so that a PCN will not be issued:

³⁵ These proposed changes would also apply to the ULEZ. The impacts have been separately assessed as part of the London-wide ULEZ Integrated Impact Assessment.

- clear signage is in place on the approach roads with 'rings' of signage at approximately a half-mile, 3 miles and 7 miles from the boundary, alerting the driver to the zone. There are also 'repeater' signs inside the zone and at the exits reminding drivers to pay.
- the charging zone is integrated on driving/mapping apps and details are all available on the TfL website.
- as well as paying in advance or by midnight on the charging day, there is an opportunity for drivers to have three days grace period to pay in the days following travel for road user charging schemes (for the Congestion Charge a higher charge of £17.50, instead of £15 if paid in advance or on the same day).
- if a driver receives a PCN for non-payment of the Congestion Charge, the penalty is halved if paid within 14 days (this also applies to ULEZ and LEZ). Representation and appeals processes are in place for drivers to challenge a PCN by referral to independent adjudicators if they believe it was issued incorrectly or unfairly or there were other mitigating circumstances.

2.6.5. A Data Protection Impact Assessment (DPIA) seeks to ensure that potential data protection and privacy risks are identified at an early stage and that measures are put in place to mitigate those risks. The UK General Data Protection Regulation (GDPR)³⁶ makes a DPIA mandatory for certain types of data processing, or any other processing that is likely to result in a high risk to the rights and freedoms of individuals.

2.6.6. Impact assessment (2), a draft DPIA considered the additions to the Automatic Number Plate Recognition (ANPR) camera infrastructure required to allow the enforcement of the new, further extended boundary area (in the region of 2,750 cameras), the back office systems and infrastructure testing, additional volumes of personal data requiring processing, awareness campaign activities and the potential for camera sharing with the police.

2.6.7. The draft DPIA outlined how we will manage and process personal data associated with the proposal and comply with the UK GDPR and Data Protection Act 2018. It includes steps that will be taken to protect data and reduce risks and ensure that data is securely held and only used for its intended purposes. The draft DPIA has been updated to take account of the privacy and data protection related responses to this consultation (Appendix N of this report).

2.7. Summary of engagement on the shape of a future road user charging scheme

2.7.1. In January 2022, the Mayor announced his preferred pathway to net zero carbon.³⁷ This would require a 27 per cent reduction in car vehicle kilometres travelled on London's roads by 2030. To help achieve this, London may

³⁶ General Data Protection Regulation

³⁷ https://www.london.gov.uk/sites/default/files/london_net_zero_2030_-_an_updated_pathway_-_gla_response_1.pdf

need a new kind of road user charging system implemented by the end of the decade. This could include replacing existing charges with a road user charging scheme that uses more sophisticated technology to make it as simple and fair as possible for customers. The technology to implement such a scheme in a complex city like London is some years from being ready.

- 2.7.2. This would be alongside wider measures, including public transport improvements, traffic and parking controls, road space reallocation to more sustainable modes, freight consolidation and co-location of services to reduce the need to travel. Additional action would also be required in other sectors to meet the net zero carbon by 2030 target, including retro-fitting buildings to be more energy efficient and the installation of heat pumps.
- 2.7.3. As we are at an early stage in our thinking on how the existing road user charging schemes could be replaced with a simple, fair scheme we asked Londoners about their views on the challenges that a potential scheme could address, and the elements that should be considered for inclusion in scheme design, such as vehicle type, distance travelled and time of day.
- 2.7.4. The feedback from this consultation will help shape our work. Any future proposals to introduce a new scheme would be subject to public and stakeholder consultation with information on detailed scheme proposals and their impacts provided.

3. Consultation process

3.1. Introduction

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

3.2. Publicising the consultation

3.2.1 We developed a marketing campaign 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 of the consultation and describe what channels were available for potential respondents to take part.

Email campaign

3.2.2 Our email campaign was designed to promote the consultation and the channels available for participating in it to different audiences. In total, we sent emails to over 2.3 million recipients. Table 6 lists the audiences we contacted, and the number of emails sent. Copies of the emails we sent are in Appendix B of this report.

Table 6: Email campaigns to raise awareness of the consultation

Audience	No. of recipients of TfL emails
Members of the public (comprising all those who had registered for the Cleaner Vehicle Discount to the Congestion Charge or, who had registered to receive emails from us.)	2,373,622
Stakeholders (including London Local Authorities, Metropolitan Police, The Mayor's Office for Policing And Crime (MOPAC), statutory stakeholders, Business Improvement Districts, MPs/Assembly Members, NHS Trusts, transport operators/groups, disabled persons representative groups, charities and vehicle manufacturers). A complete list of all the stakeholders we contacted is included in Appendix G of this report.	1,960*

Press and digital advertising

3.2.3 We advertised the opportunity to submit a response to us throughout the consultation period and across a number of press titles. A copy of our press advertisement is included in Appendix B of this report. Table 7 lists the press titles which carried our advertisement, and the dates it appeared. The total audience was 3,270,566.

Table 7: Press titles and dates

Press titles	Insertion dates
National press Evening Standard, Metro London, The Guardian, Daily Mail, The Mirror, Daily Express and Daily Star	w/c 23 May – Weds, Thurs and Friday that week w/c 4 July – Tuesday, Wednesday, Thursday, Friday that week
Regional Press 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 June w/c 4 July – varied between papers, but between 5 and 8 July
Specialist Press Business Car, Fleetworld/ Van Fleet World, Van User, MCN, What Van, What Car, Route One	Various dates throughout the consultation period

3.2.4 We promoted the launch of the consultation with a notice in the London Gazette on 20 May 2022. The Mayor’s Guidance issued in respect of TfL’s exercise of road user charging functions suggests that TfL should publish notice of the making of a Road User Charging Order and details of the consultation in the London Gazette. As such, the notice was published on 20 May 2022 and a copy is included in Appendix B of this report.

3.2.5 We issued a press release on 20 May 2022 to promote the launch of the consultation. A copy of the press release is included in Appendix B of this report.

- 3.2.6 We used a number of digital advertising tools to promote the consultation. These were principally ‘pop-up’ adverts aimed at people browsing the internet or who, through their browsing history (for example visiting travel or traffic-related websites), we judged would have a potential interest in our consultation. The advertisements would direct anyone with an interest in our consultation and provide a link to our online consultation portal. We sponsored a number of key-word searches in Google so that a link to our consultation webpage would be returned as the first link in a search using a large number of terms which were related to our consultation.
- 3.2.7 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 B of this report.

Radio advertising

- 3.2.8 We advertised the opportunity to submit a response to us throughout the consultation period across a number of radio stations. The script for the advertisement is included in Appendix B of this report. Table 8 **Error! Reference source not found.** lists the radio stations that carried our advertisement and the dates the advertisement aired. The total audience was 20,952,099.

Table 8: Radio channel title and date advertisement aired

Radio Channel	Dates
Capital London Heart Kent Heart London Heart Sussex LBC (London) Smooth Radio London Heart Four Counties - Beds/Bucks/Herts Heart Four Counties - Northamptonshire Heart Four Counties - Milton Keynes Heart Four Counties - Bedfordshire LBC News (London) Heart Four Counties 96.6 FM Hertfordshire Greatest Hits Radio (Bucks Beds & Herts) (was Mix 96) 106 JACKfm (Oxford) Kiss (London) Total Radio Essex Magic (London) Greatest Hits Radio (London) Sunrise Radio London	25 May to 24 July

3.2.9 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 B of this report.

3.3. Stakeholder engagement

3.3.1 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.

3.3.2 We contacted these 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.

3.3.3 We offered where possible to meet with stakeholders to be more inclusive. A list of these meetings is contained within Appendix I of this report.

3.4. Consultation materials and channels for responding

3.4.1 The consultation was conducted online using our consultation 'portal'³⁸, in common with our other consultations. The portal included a survey which respondents could complete. Our consultation portal included the following information to help respondents to come to an informed point of view:

- London-wide ULEZ and MTS revision baseline report for ULEZ Scheme IIA and MTS IIA
- London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA)
- Proposed Mayor's Transport Strategy (MTS) revision Integrated Impact Assessment (IIA)
- Proposed Congestion Charge and Low Emission Zone changes Impact Assessment
- Proposed MTS Revision
- London-wide ULEZ Data Protection Impact Assessment (DPIA)
- Consultation brochure providing a less technical summary of proposals
- An interactive map demonstrating the proposed new ULEZ boundary and postcode checker
- An overview map, showing proposed ULEZ boundary
- An Easy Read version of the consultation materials and proposed changes
- British Sign Language video of the proposals
- Video file of the proposals
- A copy of the consultation survey, for those preferring to complete it offline and post it
- A draft of the proposed LEZ-ULEZ Variation Order and a marked-up copy of the LEZ-ULEZ Scheme Order showing changes as if the draft variation order had been confirmed without modification

³⁸ The consultation portal page can be viewed at <https://haveyoursay.tfl.gov.uk/cleanair>

- A copy of the Congestion Charge Variation Order made by TfL on 16 May 2022, and a marked-up copy of the Congestion Charge Scheme Order showing changes as if the variation order had been confirmed without modification
- Frequently Asked Questions

3.4.2 Members of the public and stakeholders were asked 20 closed questions and three free-text questions within the consultation survey.

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 their response
- 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
- 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:

- Thematic coding of open-ended questions;
- Quantitative analysis of the closed questions and demographic questions; and;
- Cleaning and analysis of postcode data provided (a postcode may have been entered as TW89QT. This would be corrected to TW8 9QT to provide location analysis).

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 survey for analysis purposes. Where possible, free-text responses have been analysed by topic rather than response to a question to allow meaningful analysis and avoid double counting where respondents have given an identical response to several questions.

3.5.3 The themes from each question were created by AECOM using the 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 10 per cent quality assurance checks and validation were completed on the coding for each question by both AECOM and TfL.

4. Consultation responses

4.1 Introduction

4.1.1 This chapter explains the number of responses we received, who they were from, the feedback received, and views 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 F of this report). We respond to the issues raised in Chapter 5.

4.2 About the respondents

Type of respondent

4.2.1 A total of 57,937 responses were received during the consultation period. On reviewing these responses, we noted that 342 were from stakeholders, 11,868 were organised responses, and the remainder were public responses.

4.2.2 Through this process we also identified that we had:

- Seven sets of duplicate responses, which had the same text and were from the same person. We investigated and found that the duplication occurred as seven emails had been uploaded twice in error.
- 24 consultation responses that were flagged as abusive towards TfL, or the Mayor.

4.2.3 At TfL we have a zero-tolerance policy towards work-related violence and aggression, including abusive and threatening communications. When a consultation response is flagged as abusive or threatening then the offending content will not be processed as part of our consultation analysis. The final decision on sanctioning an abusive or threatening response is made by our Strategic Consultation Lead.

4.2.4 Following this review, we did not include the 24 abusive responses in the consultation analysis undertaken by our supplier AECOM.

4.2.5 We received eight stakeholder responses after the consultation had closed. These eight stakeholders have not been included in AECOM's closed question and thematic analysis but have been summarised in Appendix F of this report.

4.2.6 A total of 57,913 responses were passed to our supplier AECOM to analyse and report on. The seven duplicate sets of responses (seven pairs) were identified at this stage and the duplicate responses were then not included in the consultation analysis, with the seven individual responses remaining.

4.2.7 Table 9 breaks down respondent types. Note respondents can be represented in more than one group and not all respondents provided a response to this question.

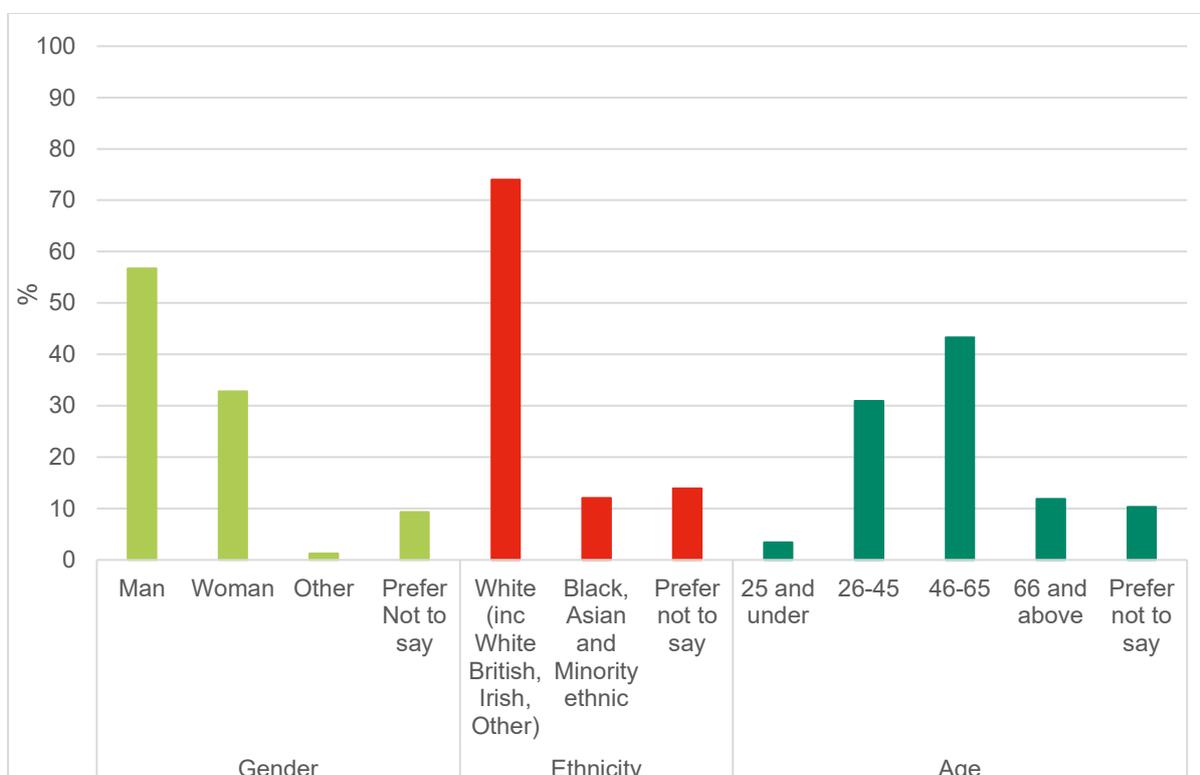
Table 9: Respondent types

Respondent type	Count
Employed in the current inner London ULEZ	14,081
Employed in outer London	11,904
A visitor to Greater London	4,290
A business owner in outer London	3,746
An owner of a business in the current inner London ULEZ	1,587
A London licensed taxi (black cab) driver	168
A London licensed private hire vehicle driver	120
None of these but interested in the proposals	9,598
Total	40,032

Respondent profile

4.2.8 Respondents provided details about themselves, such as age, gender and ethnic origin. These questions were optional and not all respondents answered them. The percentages in Figure 2 are those who provided this information. Therefore, any difference in response by demographic profile should be treated with caution.

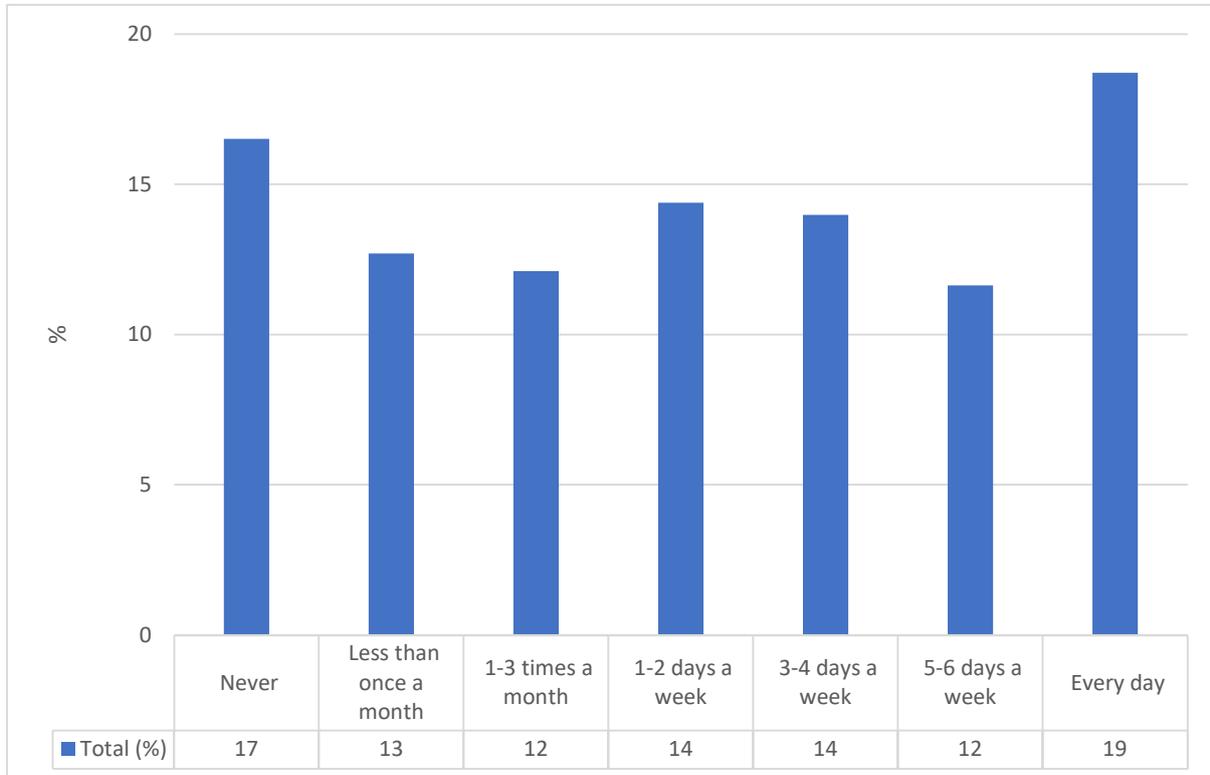
Figure 2: Respondent profile



Base: all respondents who answered (Gender 36,770; Ethnicity 36,773; Age 36,968)

4.2.9 Other information was also gathered from respondents that could influence their opinion, including frequency of driving within Greater London (4.2.10 Figure 3).

Figure 3: How often do you drive in Greater London? (%)



Base: all respondents who answered (44,031)

4.2.11 As set out in sections 3.2 - 3.4, significant efforts were made when consulting the public and stakeholder organisations to achieve a representative response to the consultation and ensure all voices were heard. As can be seen in Figure 2 and

4.2.12 Figure 3 above, consultation respondents were not representative of the London population.³⁹ In order to understand the views of a representative sample of Londoners, the GLA commissioned a poll to understand Londoners' views on the proposals, alongside the consultation. This is explained in more detail in section 5.23.

How respondents heard about the consultation

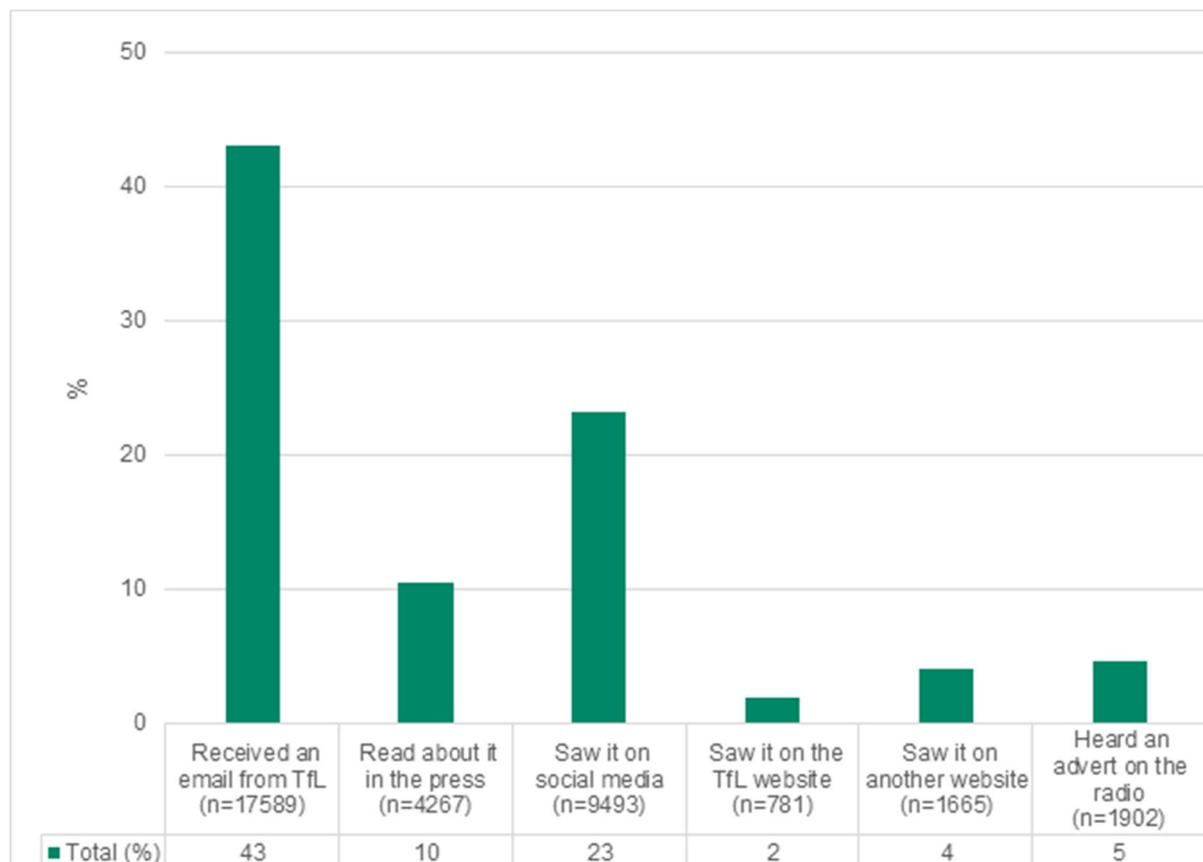
4.2.13

4.2.14 Figure 4 shows how respondents heard about the consultation. 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

³⁹ Household survey data (LTDS 2019/20) shows that 22 per cent of London adults drive five or more days per week compared to 31 per cent of consultation respondents. 42 per cent of London adults have never driven, compared to only 17 per cent of consultation respondents.

responded, 43 per cent had received an email from us inviting them to take part.

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



Base: all respondents who answered (40,818)

Respondent location

4.2.15 A total of 37,222 respondents provided a postcode. Table 10 shows respondent residency and Table 11 provides a breakdown of Greater London respondents by London Borough.

Table 10: Respondent residency*

Respondent Residency	Count	Percentage
In the current inner London ULEZ	12,625	22
In outer London	31,436	54
Neither of the above	9,765	17
Don't know / postcode not provided	4,087	7
Total	57,913	100

*The table above shows responses from Q23 with people selecting the option relevant to them. 37,222 people also provided their post code with which we could identify the area for them if they did not answer the question.

Table 11: Respondent location*

<u>Location</u>	<u>Count</u>	<u>%</u>
<u>Barking and Dagenham</u>	493	1
<u>Barnet</u>	1,316	4
<u>Bexley</u>	2,441	7
<u>Brent</u>	623	2
<u>Bromley</u>	2,965	8
<u>Camden</u>	635	2
<u>City of London</u>	65	0
<u>City of Westminster</u>	475	1
<u>Croydon</u>	1,845	5
<u>Ealing</u>	1,261	3
<u>Enfield</u>	997	3
<u>Greenwich</u>	956	3
<u>Hackney</u>	693	2
<u>Hammersmith and Fulham</u>	505	1
<u>Haringey</u>	817	2
<u>Harrow</u>	1,263	3
<u>Havering</u>	1,947	5
<u>Hillingdon</u>	1,868	5
<u>Hounslow</u>	1,227	3
<u>Islington</u>	744	2
<u>Kensington and Chelsea</u>	320	1
<u>Kingston upon Thames</u>	1,190	3
<u>Lambeth</u>	1,306	4
<u>Lewisham</u>	1,294	3
<u>Merton</u>	1,086	3
<u>Newham</u>	420	1
<u>Redbridge</u>	801	2
<u>Richmond upon Thames</u>	1,460	4
<u>Southwark</u>	1,228	3
<u>Sutton</u>	1,796	5
<u>Tower Hamlets</u>	758	2
<u>Waltham Forest</u>	834	2
<u>Wandsworth</u>	1,393	4
<u>Total</u>	37,022	100

*Respondents who provided postcode data only

4.3 Petitions and organised responses

Petitions

4.3.1 A petition is a formal request for action written to a governmental authority or individual public office holder. Petitions usually relate to a single political issue

and originate from one or multiple concerned members of the public. These members seek to gain signatures from others to endorse their position on the issue at hand. It is a means for the general public to participate politically by seeking influence by mobilising mass democratic support or opposing the consultation proposals.

- 4.3.2 We received five petitions during the consultation period. Each petition is listed below and includes a copy of the petition statement and number of signatures. Each petition statement has been read and an acknowledgement of receipt was sent to those petitioners who provided contact details when presenting the petition to us.
- 4.3.3 We were also made aware of a number of petitions that stakeholders ran as well as petitions that were organised online, however these petitions were not submitted to us, therefore we have not included them in our report.
- 4.3.4 The number of signatures on each petition has not been included in the total number of responses received to the consultation. We only include the number of completed consultation surveys or individual email, letter or telephone responses received in our final analysed figures, as per our standard practice and consultation petition policy.

GLA Conservatives Petition

- 4.3.5 Susan Hall AM submitted a petition on behalf of the GLA Conservatives. She informed us in the covering letter that 6,303 people had signed the petition calling on the Mayor to stop the plans to expand the ULEZ to the whole of Greater London, although the details of the signatures were not submitted. The petition stated:

Stop Sadiq Khan's Greater London ULEZ Expansion Plan

On 23rd August 2023, Sadiq Khan plans to expand the Ultra-Low Emission Zone (ULEZ) across almost all of Greater London.

Please sign the petition below to make him think again.

Currently, the ULEZ charge covers everything inside the North and South Circulars. If the Mayor's plan goes ahead, it will cover the vast majority of Greater London.

*Under the Mayor's new plans, anyone who drives an older vehicle within Greater London, could find themselves paying **£12.50** a day.*

It is vital that we improve London's air quality, but there are better ways to do this than a ULEZ expansion, which is mostly about raising money from people who have poor access to public transport and cannot afford to replace their cars.

The Mayor should also be doing all he can to boost London's recovery by supporting businesses and charities. He should not be making it more difficult for them to operate or attract clients.

This is why we cannot support the proposed expansion of the ULEZ to the whole of Greater London.

The Mayor has claimed “this is a genuine consultation” and stated he would not press ahead with the plans if the public overwhelmingly rejected them. By signing this petition and responding to TfL’s formal [consultation](#) you can help hold the Mayor to his word.

We the undersigned, call on the Mayor of London, Sadiq Khan, to stop his plans to expand the ULEZ to the whole of Greater London.

St Alban’s Ward petition

- 4.3.6 Councillor Judith Holt submitted a petition on behalf of St Alban’s Ward residents in the London Borough of Havering. The petition received 45 signatures in total and included the names and contact details of those who had signed. The petition stated:

Stop Labour Mayor Kahn’s ULEZ Zone Extension to Havering!

*We the undersigned, strongly **oppose** any expansion of the ULEZ charging zone to Havering, due to the catastrophic economic impact it will have on families and small businesses in Havering.*

Rush Green and Crowlands Ward petition

- 4.3.7 Councillor Viddy Persaud submitted a petition on behalf of Rush Green and Crowlands Ward in the London Borough of Havering. The petition received 84 signatures in total and included the names and addresses of people who had signed the petition. The petition stated:

OBJECTION to the Mayors plan to extend the ULEZ into Havering.

*We the undersigned, strongly **oppose** any expansion of the ULEZ charging zone to Havering, due to the catastrophic economic impact it will have on families and small businesses in Havering.*

First London Borough of Bexley Residents petition

- 4.3.8 We received a petition via post from residents of the London Borough of Bexley. The petition received 245 signatures in total and included the names and postcodes people who had signed the petition. The petition stated:

Objection to the Mayor of London’s proposal to extend the Ultra Low Emission Zone London-wide

- *Bexley has a high level of car ownership due to the lack of modern public transport links serving the borough*
- *Bexley is one of only two London boroughs with no Underground stations, no access to the DLR, no trams and no rapid bus services*
- *The ULEZ charge is a regressive tax, disadvantaging lower income families who cannot afford to pay the charge or buy ULEZ compliant vehicles*

- *It also puts further pressure on household finances, when energy, food and other prices are rising*
- *Key workers in industries such as health and the care sector who rely on their cars to visit patients will be unfairly penalised*
- *It will also put an extra burden on small businesses*
- *Non-compliant vehicles are likely to be bought by people in area outside the ULEZ, where they will continue to impact on air quality and climate change*
- *We believe there are more effective ways to address air quality*
- *The ULEZ charge will deter people from outside the capital who wish to drive into London to work, shop, to see family, friends or visitor attractions*

Second London Borough of Bexley Residents petition

4.3.9 We received a second petition from residents in the London Borough of Bexley. This petition had 36 signatures in total and included the names and postcodes of those who had signed the petition. The petition stated:

Objection to the Mayor of London's proposal to extend the Ultra Low Emission Zone London-wide.

We support Bexley Council!

Organised responses

4.3.10 When analysing the consultation responses, it was apparent there were several organised responses. An organised response is where a stakeholder or group of stakeholders encourage their members or supporters to respond to the consultation in a specified way, typically either in support of or opposition to the proposals.

4.3.11 The organised responses identified were:

- **Fair Fuel UK:** a total of 4,726 responses were received in connection to an organised response on behalf of motorists.
- **Living Streets:** a total of 544 identical responses were received in connection to Living Streets.
- **London Cycling Campaign:** a total of 1,581 responses were received in connection to the London Cycling Campaign;
- **London Friends of the Earth Network (via Action Network):** a total of 705 responses were received in connection with London Friends of the Earth;
- **Wearepossible.org:** a total of 4,312 responses were received in connection to an organised response focused on a zero-carbon society.

4.3.12 As all organised responses were received via email, they were all read by our consultation team and shared with AECOM for analysis as part of the consultation.

4.3.13 The types of organised responses we received fell into one of the following categories:

- A statement of support, which was the same text for all of the organised responses we received. We included every instance of the statement of support in our qualitative analysis of the responses to the survey. The 544 email responses from supporters of Living Streets fell into this category.
- A statement of support, and answers to a selection of consultation survey questions. The following responses fell into this category:
 - o 1,581 emails from supporters of the London Cycling Campaign
 - o 705 emails from supporters of the Friends of the Earth Network (Via Action Network)
 - o 4,312 emails from supporters of Wearepossible.org

We included every instance of the statement of support in our qualitative analysis of the responses to the survey. Where these responses included answers to specifically identified questions from the consultation survey, we included this data in our quantitative consultation analysis for each of these questions. Where responses simply amounted to a general statement without reference to any specific question in the consultation questionnaire that allowed such an answer (e.g. “I support expansion...” without referencing the question where the response could be “The right date”) then the response was not included in the data in our quantitative consultation analysis of that particular question.

- The same statement of opposition, which was the same text for all of the organised responses we received. We included every instance of the statement of opposition in our qualitative analysis of the responses to the survey. The 4,726 email responses from supporters of Fair Fuel UK fell into this category.

4.3.14 The standard text provided by these organised responses is shown in the consultation analysis report by AECOM (Appendix F of this report). Respondents were able to change the text or answers offered as standard text before submitting.

4.3.15 Of the five organised responses, four were in support of the proposals (Action Network, London Cycling Campaign, Living Streets and Wearepossible – totalling 7,142 responses), whereas the Fair Fuel organised response was in opposition (4,726 responses).

4.3.16 Some but not all organised response emails included a consultee’s postcode. Of the organised responses that provided postcode data, the split between inner, outer and outside London is as follows:

- 4,173 lived in the current inner London ULEZ (Fair Fuel 115; Living Streets 256; London Cycling Campaign 966; London Friends of the Earth (via Action Network) 335; Wearepossible.org 2,501);
- 2,687 lived in outer London (Fair Fuel 609; Living Streets 174; London Cycling Campaign 174; London Friends of the Earth (via Action Network) 280; Wearepossible.org 1,155); and
- 4,051 lived outside of Greater London (Fair Fuel 3,765; Living Streets 105; London Cycling Campaign 83; London Friends of the Earth (via Action Network) 48, Wearepossible.org 50). The Fair Fuel organised response drew feedback from across the UK, including Scotland and Northern Ireland.

4.3.17 Given the very high volume of responses to all five organised responses, we have demonstrated their impact on the final consultation results in our analysis and reporting by showing numbers with and without organised responses. Where the response included an answer to a specifically identified question in the consultation survey then it was included in the “with” category. This is indicated in the second and third columns as “Public *includes/ excludes* organised responses”.

4.3.18 In addition, the reporting for the free-text questions in the consultation survey includes the total number of responses assigned to a thematic code with and without organised responses.

4.3.19 In addition, there were two further sources of information offering opinions about the ULEZ as follows:

- The London Borough of Bexley communicated a point of view to their residents which they could use to respond to the consultation, having sought out the consultation portal themselves (as opposed to an organised response where a standard response may be sent by completing a form or forwarding an email).
- 38 Degrees.org: there was a campaign raising awareness of the consultation on their website which required people to send their own views about the ULEZ, as opposed to an organised response. Therefore, responses varied.

4.4 Stakeholder responses

4.4.1 We received 342 stakeholder responses to the consultation. 334 of these responses were received during the consultation period and have been included within AECOM’s thematic analysis and closed question analysis where applicable.

4.4.2 Eight stakeholder responses were received outside the consultation period and were not included in AECOM’s analysis. We were not obliged to include any late submissions in our assessment and none of the late submissions (whether by private individuals or stakeholders) were included in the data sent

to AECOM. We have not included any analysis of the late submissions made by private individuals. We have decided that it would be appropriate to include some information about late submissions by stakeholders because they represent a particular area/constituency/wider interest (such as Elliott Coburn MP or Chessington World of Adventures). We considered it would assist the Mayor in his decision-making to be told their views.

4.4.3 The late stakeholders are:

- Camping and Caravanning Club (Director General)
- Chessington World of Adventures
- Community Transport Association
- Elliot Coburn MP (Carshalton and Wallington)
- Greener Practice South London and Greener Practice North London
- Homecare Association
- Mortlake with East Sheen Society
- St George's University Hospitals Foundation Trust

4.4.4 All stakeholder summaries can be viewed in Appendix H of this report.

4.5 Closed question analysis

4.5.1 The following sections (4.6 – 4.25) summarise responses to the closed questions in the survey.

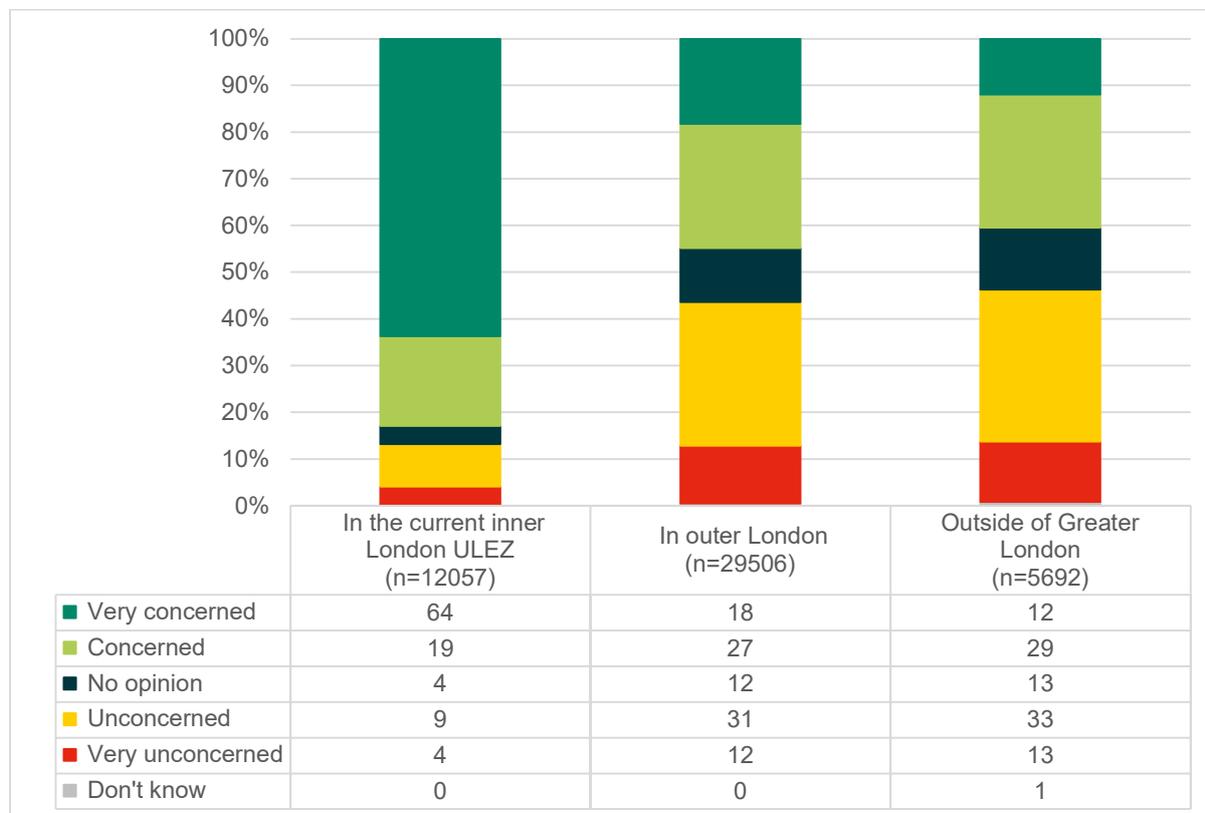
4.6 Concern about air quality

4.6.1 We asked respondents to tell us how concerned they are about air quality where they live. Results are shown in Table 12 and Figure 5.

Table 12: Respondent's level of concern about air quality where they live, by type of response. (Percentage of respondents, %)

	All responses (%)	Public (includes organised responses*) (%)	Public (excludes organised responses) (%)	Stakeholder (%) **
Very concerned	30	30	18	34
Concerned	25	25	29	32
No opinion	10	10	11	12
Unconcerned	25	25	29	12
Very unconcerned	10	10	12	10
Don't know	0	0	1	1
Total number of responses	48,001	47,882	41,301	119
Base: all respondents (47,882 public; 119 stakeholders; 9,912 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 further detail. **Only 119 stakeholders answered this question therefore the percentages should be treated with caution				

Figure 5: Respondents' level of concern about air quality where they live, postcode provided and by area of residence (Percentage of respondents, %) n= number of responses



4.7 Vehicle standards

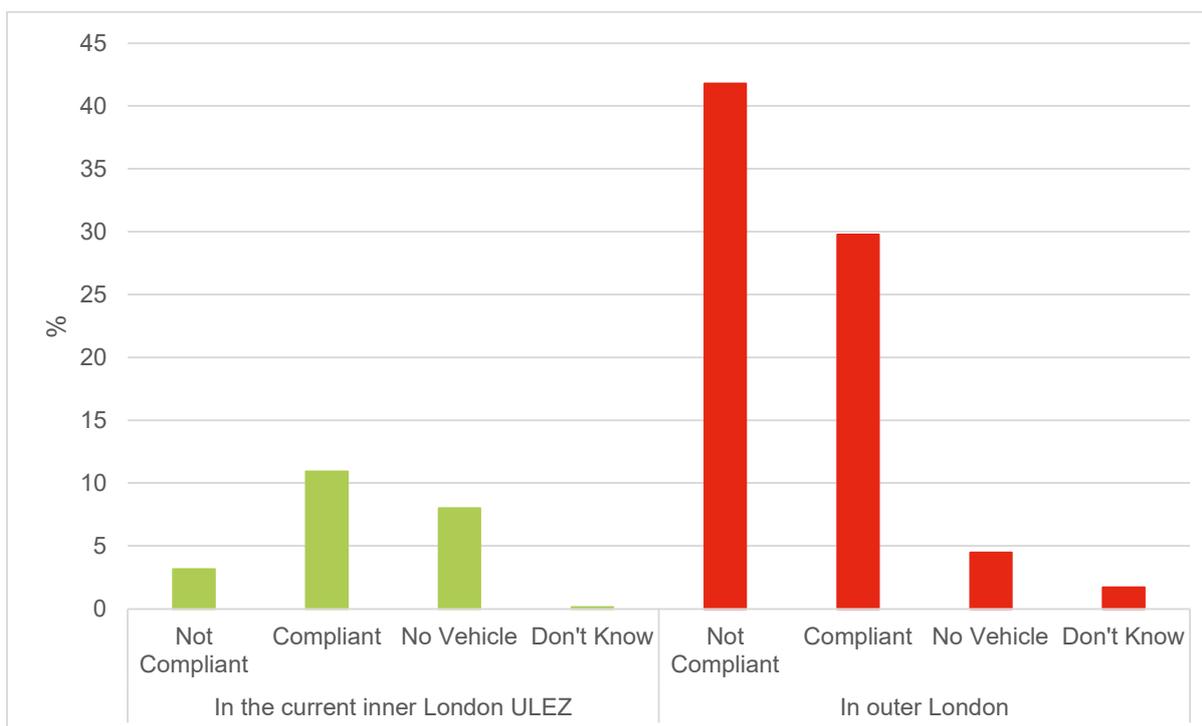
4.7.1 We asked respondents whether their vehicle(s) meet the emissions standards required to drive in London without paying the ULEZ charge. For those respondents who were not sure about their vehicle's status, we provided a link to our vehicle compliance checker. Respondents may still have answered the question based on their own understanding only without checking if their vehicle was compliant or not. Results are shown in Table 13 and Figure 6. There were no organised responses to this question.

Table 13: Respondent vehicle compliance by respondent residency (Percentage of respondents, %)

Respondent vehicle type	In the current inner London ULEZ (%)	In outer London (%)	Outside Greater London (%)
Yes – my vehicle meets the standards	45	33	28
Yes – I have more than one vehicle, all of which meet the standards	4	6	5
No – my vehicle doesn't meet the standards	9	34	39

Respondent vehicle type	In the current inner London ULEZ (%)	In outer London (%)	Outside Greater London (%)
No – I have more than one vehicle, one or more of which do not meet the standards	5	20	23
I don't know	1	2	3
I don't own a vehicle	36	6	3
Total number of responses	7,859	27,551	5,509

Figure 6: All respondents: current compliance to the ULEZ emissions standards (Percentage of respondents, %)



Base: all respondents who answered (35,499)

4.8 Discounts and exemptions (registration / entitlement)

4.8.1 We asked respondents if they are registered for a discount or entitled to an exemption for the current ULEZ. Results are shown in Table 14.

Table 14: Are you registered for a discount or entitled to an exemption for the current ULEZ (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Yes	2	2	2	10
No	91	91	91	77
Don't Know	7	7	7	13

Total number of responses	41,153	41,039	41,024	114
Base: all respondents (41,039 public; 114 stakeholders; 16,760 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 113 stakeholders answered this question therefore the percentages should be treated with caution				

4.9 Discounts and exemptions (relevant discount or exemption)

4.9.1 If respondents answered 'Yes' to the previous question on discount or exemption eligibility, we asked them what discount or exemption they are entitled to. Results are shown in Table 15.

Table 15: Please indicate the relevant discount or exemption (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Vehicles for disabled people (with 'disabled' or 'disabled passenger vehicle' tax class)	45	45	45	9
Minibuses used for community transport registered for discount	1	0	0	36
Wheelchair-accessible private hire vehicles	1	1	1	0
Other exempt vehicles, such as specialist agricultural vehicles, military vehicles, non-road going vehicles and mobile	1	1	1	0
Taxis	6	6	6	9
Historic vehicles	13	12	12	18
Showman's vehicles registered for discount	1	1	1	18
Other	37	37	37	9
Total (number) of responses	695	684	684	11
Base: all respondents (684 public; 11 stakeholders; 57,218 total did not answer this question) ** Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 11 stakeholders answered this question therefore the percentages should be treated with caution				

4.10 NHS patient reimbursement scheme

4.10.1 We asked respondents if they have claimed a reimbursement of the ULEZ charge under the NHS patient reimbursement scheme. Results are shown in Table 16.

Table 16: Have you claimed a reimbursement of the ULEZ charge under the NHS patient reimbursement scheme? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Yes	0.2	0.2	0	3
No	99	99	99	95
Don't Know	1	1	1	3
Total number of responses	40,997	40,884	40,874	113

Base: all respondents (40,884 public; 113 stakeholders; 16,916 total did not answer this question)
 * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail.
 **Only 112 stakeholders answered this question therefore the percentages should be treated with caution

4.11 Importance of discounts, exemptions and reimbursements

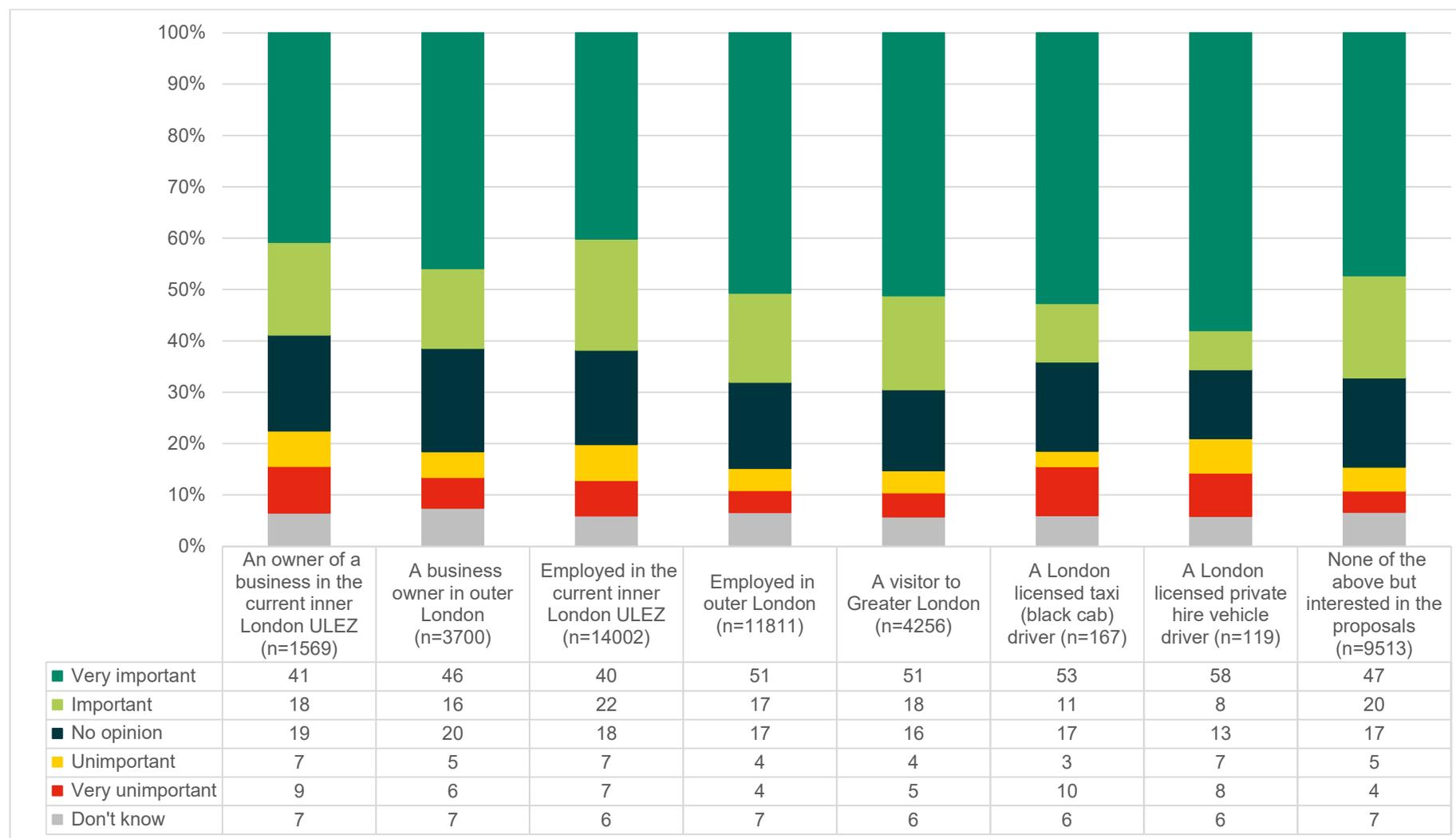
4.11.1 We asked respondents how important they feel it is that we continue the existing discounts, exemptions and reimbursements for the ULEZ. Results are shown in Table 17 and Figure 7.

Table 17: How important do you consider it is to continue to have these existing discounts, exemptions and reimbursements for the ULEZ? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very important	46	46	46	61
Important	20	20	19	22
No opinion	18	18	18	10
Unimportant	5	5	5	1
Very unimportant	5	5	5	4
Don't Know	6	6	6	2
Total	41,792	41,673	41,054	119

Base: all respondents (41,673 public; 119 stakeholders; 16,121 total did not answer this question)
 * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail.
 **Only 119 stakeholders answered this question therefore the percentages should be treated with caution

Figure 7: How important do you consider it is to continue to have these existing discounts, exemptions and reimbursements for the ULEZ? (%)



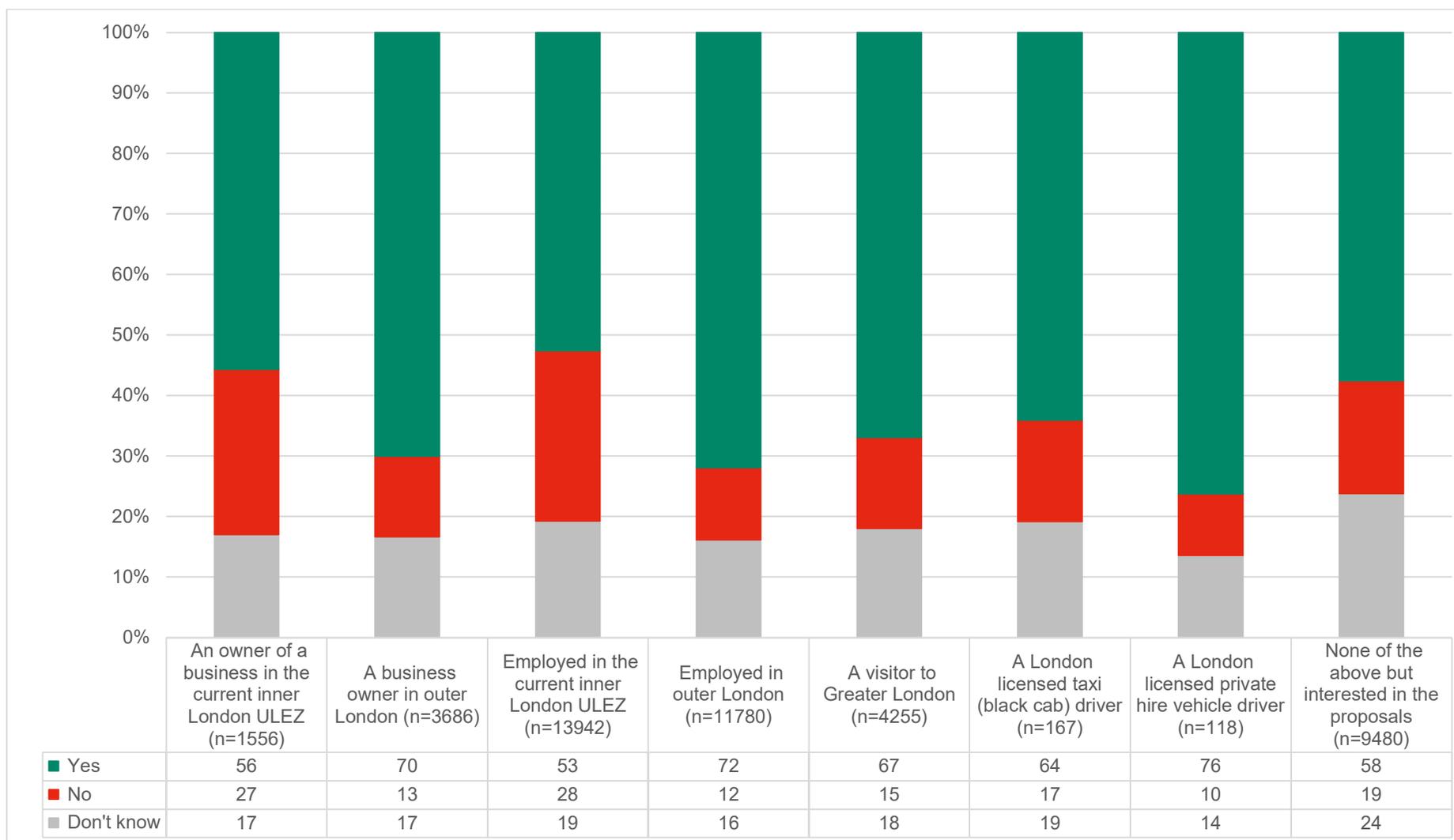
4.12 Providing further discounts, exemptions or reimbursements

4.12.1 We asked respondents if we should consider providing any further discounts, exemptions or reimbursements for the ULEZ. Results are shown in Table 18 and Figure 8.

Table 18: Do you think we should provide any further discounts, exemptions or reimbursements for the ULEZ? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Yes	54	54	61	71
No	29	29	20	15
Don't know	17	17	20	15
Total	46,192	46,076	41,071	116
Base: all respondents (46,076 public; 116 stakeholders; 11,721 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 116 stakeholders answered this question therefore the percentages should be treated with caution				

Figure 8: Do you think we should provide any further discounts, exemptions, or reimbursements for the ULEZ? (%)



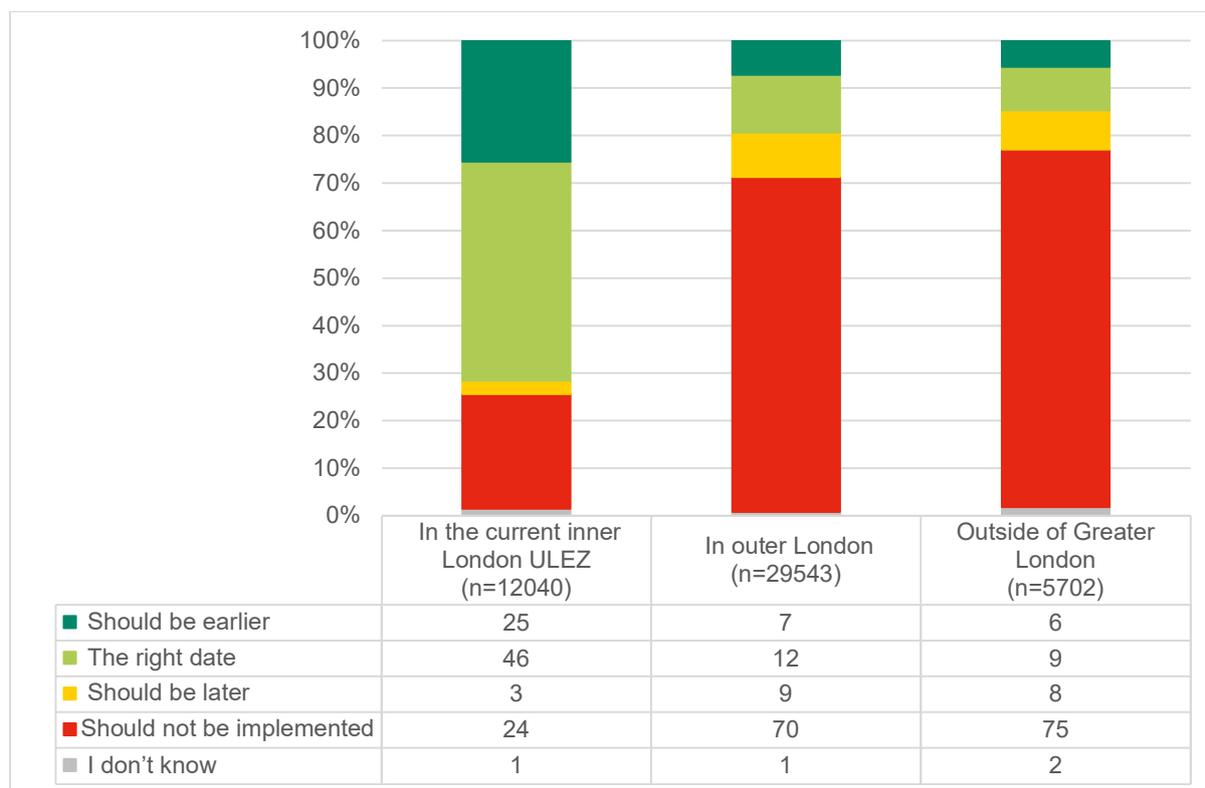
4.13 Implementation date of ULEZ London-wide

4.13.1 We asked respondents what they thought about the proposed implementation date of 29 August 2023 for the proposed expanded ULEZ to be implemented. Respondents could choose between agreeing with the proposed date, supporting an earlier implementation date, suggest implementing the scheme, but at a later date, or not implementing the scheme at all. The results are shown in Table 19 and Figure 9.

Table 19: We are proposing to expand the ULEZ London-wide on 29 August 2023. What do you think of the implementation date? (Percentage of respondents, %)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Should be earlier	12	12	13	13
The right date	21	21	9	18
Should be later	8	7	9	22
Should not be implemented	59	59	68	43
I don't know	1	1	1	5
Total number of responses	48,028	47,908	41,353	120
Base: all respondents (47,908 public; 120 stakeholders; 9,885 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 120 stakeholders answered this question therefore the percentages should be treated with caution				

Figure 9: Respondents' opinions about the proposed implementation date, by area of residence (Percentage of respondents, %)



4.14 Scrappage scheme

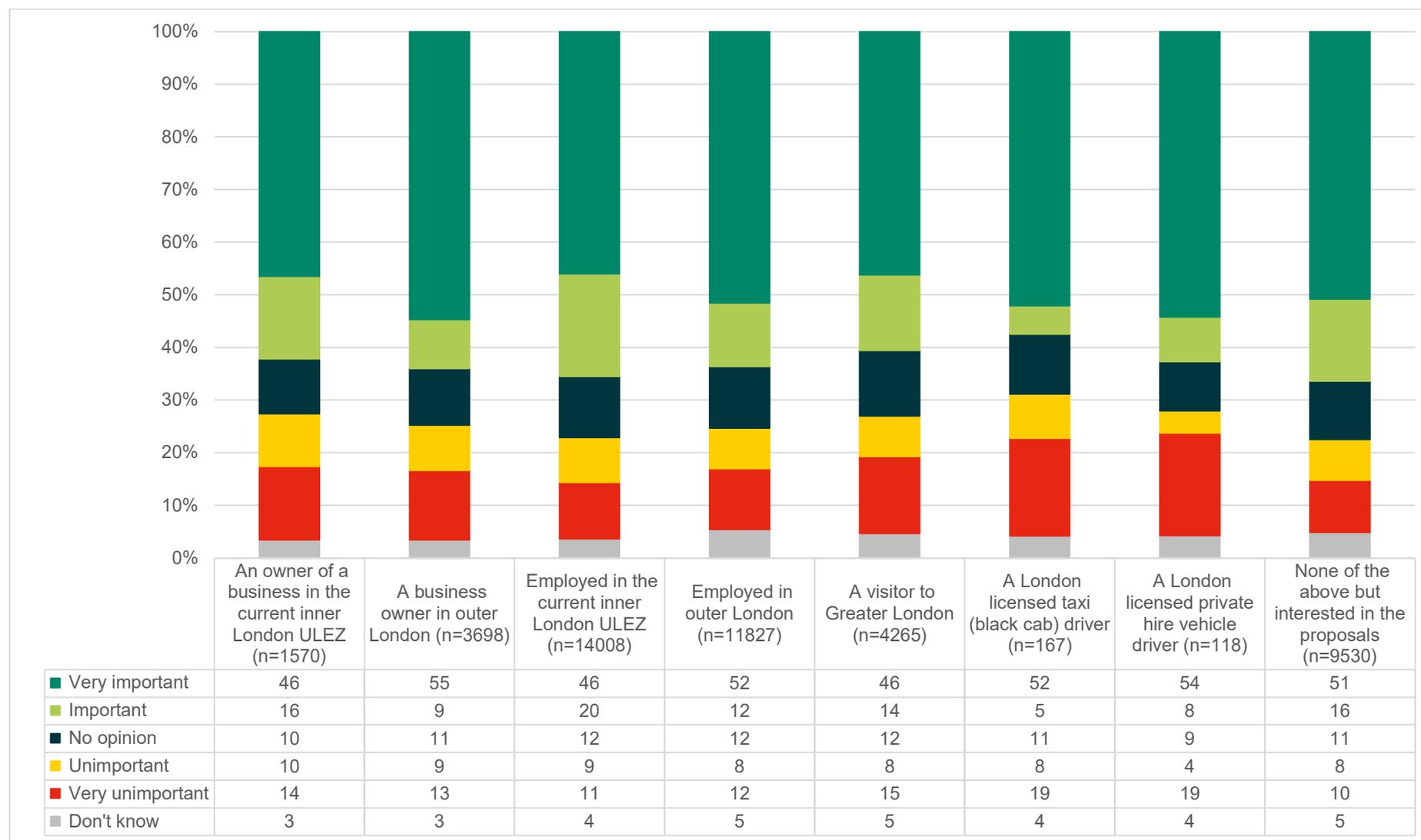
4.14.1 We asked respondents how important they felt it was that the proposed expansion of the ULEZ is supported by a scrappage scheme. Results are shown in Table 20 and Figure 10.

Table 20: How important is it that the proposed expansion of the ULEZ is supported by a scrappage scheme? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very important	55	55	49	57
Important	14	14	16	16
No opinion	10	10	12	14
Unimportant	7	7	8	3
Very unimportant	10	10	11	8
Don't Know	4	4	5	2
Total	46,358	46,238	41,259	120

Base: all respondents (46,238 public; 120 stakeholders; 11,555 total did not answer this question)
 * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail.
 **Only 120 stakeholders answered this question therefore the percentages should be treated with caution

Figure 10: How important is it that the proposed expansion of the ULEZ is supported by a scrappage scheme? (%)



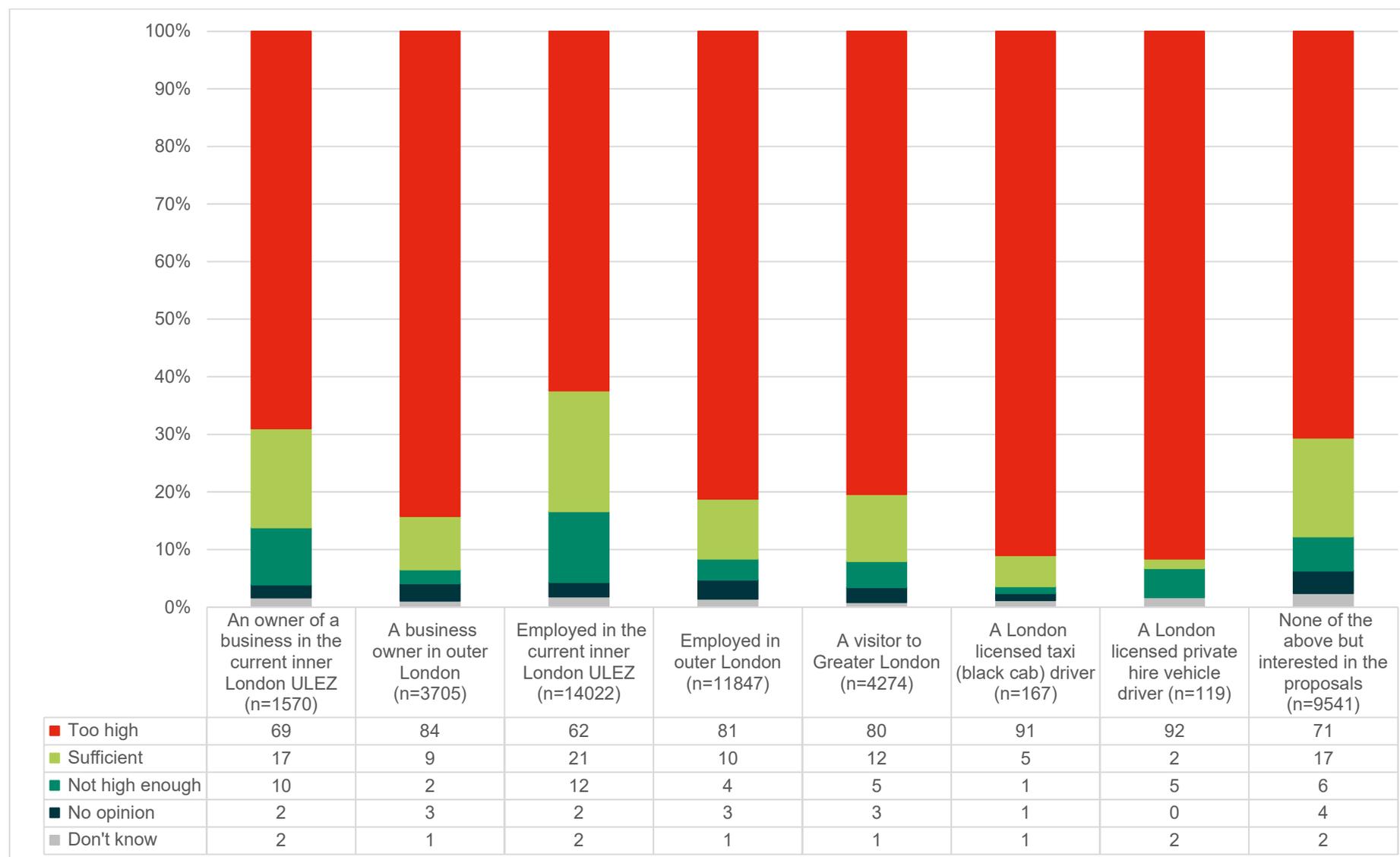
4.15 PCN level

4.15.1 We proposed an increase to the PCN level in order to ensure it remains an effective deterrent. We asked respondents to provide their views on the proposed £180 PCN level and whether this would be effective in achieving our aims. Results are shown in Table 21 and Figure 11.

Table 21: What do you consider the proposed PCN level of £180 is? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Sufficient to act as an effective deterrent	25	25	16	34
Not high enough to act as an effective deterrent	6	6	7	3
Too high	64	64	72	57
Don't know	2	2	2	3
No opinion	3	3	3	3
Total	46,353	46,234	41,306	119
Base: all respondents (46,234 public; 119 stakeholders; 11,560 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 119 stakeholders answered this question therefore the percentages should be treated with caution				

Figure 11: What do you consider the proposed PCN level of £180 is? (%)



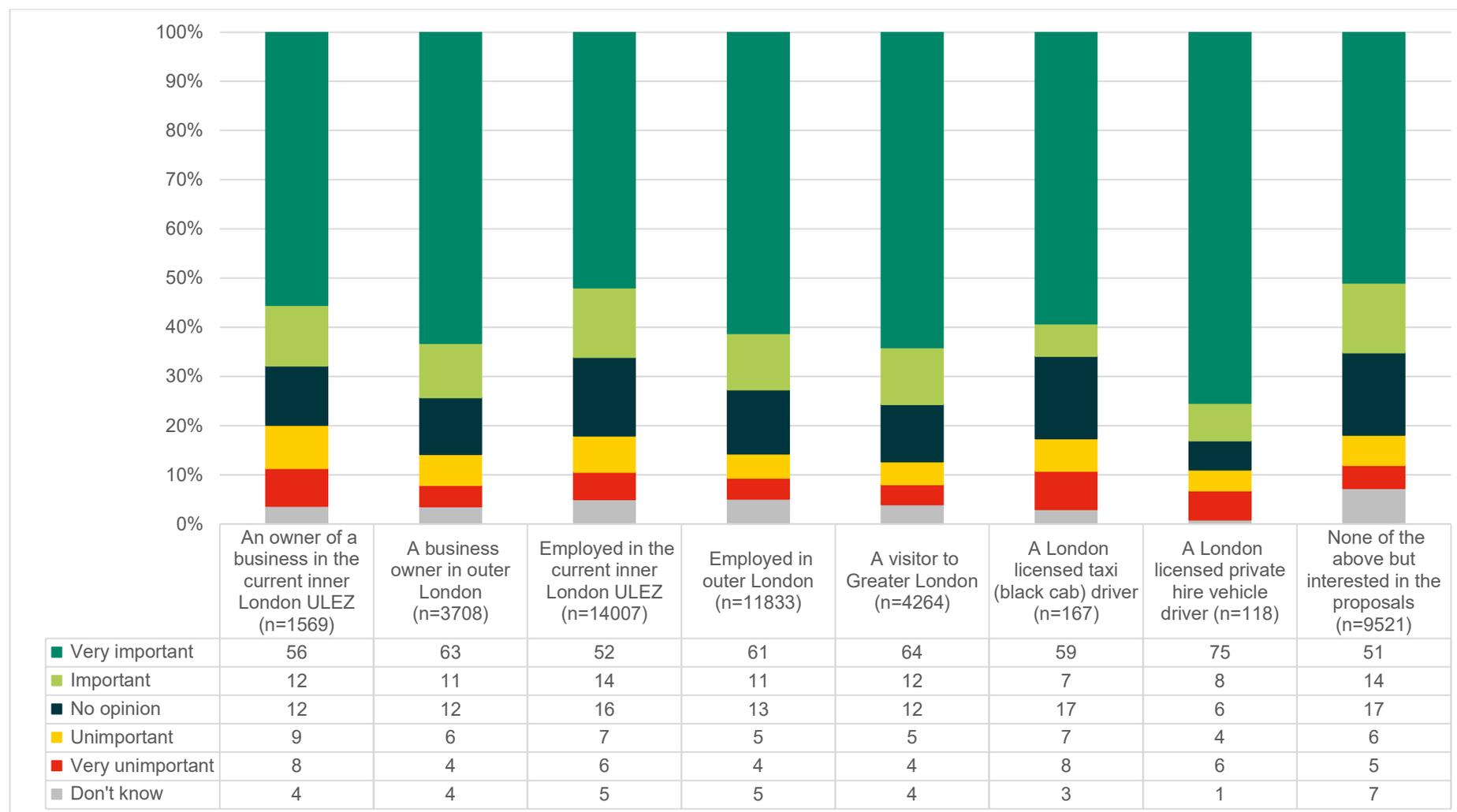
4.16 Auto Pay administration fee

4.16.1 We asked respondents what they thought about our proposal to remove the annual £10 Auto Pay administration fee per vehicle for existing road user charges in London. Results are shown in Table 22 and Figure 12.

Table 22: How important is it that we remove the annual £10 Auto Pay administration fee per vehicle (for the ULEZ, the Low Emission Zone (LEZ), and the Congestion Charge)? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very important	55	55	55	49
Important	13	13	13	17
No opinion	15	15	15	12
Unimportant	6	6	6	12
Very unimportant	5	5	5	7
Don't Know	6	6	6	4
Total	41,280	41,160	41,091	120
Base: all respondents (41,160 public; 120 stakeholders; 16,633 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 120 stakeholders answered this question therefore the percentages should be treated with caution				

Figure 12: How important is it that we remove the annual £10 Auto Pay administration fee per vehicle (for the ULEZ, the Low Emission Zone (LEZ), and the Congestion Charge)?



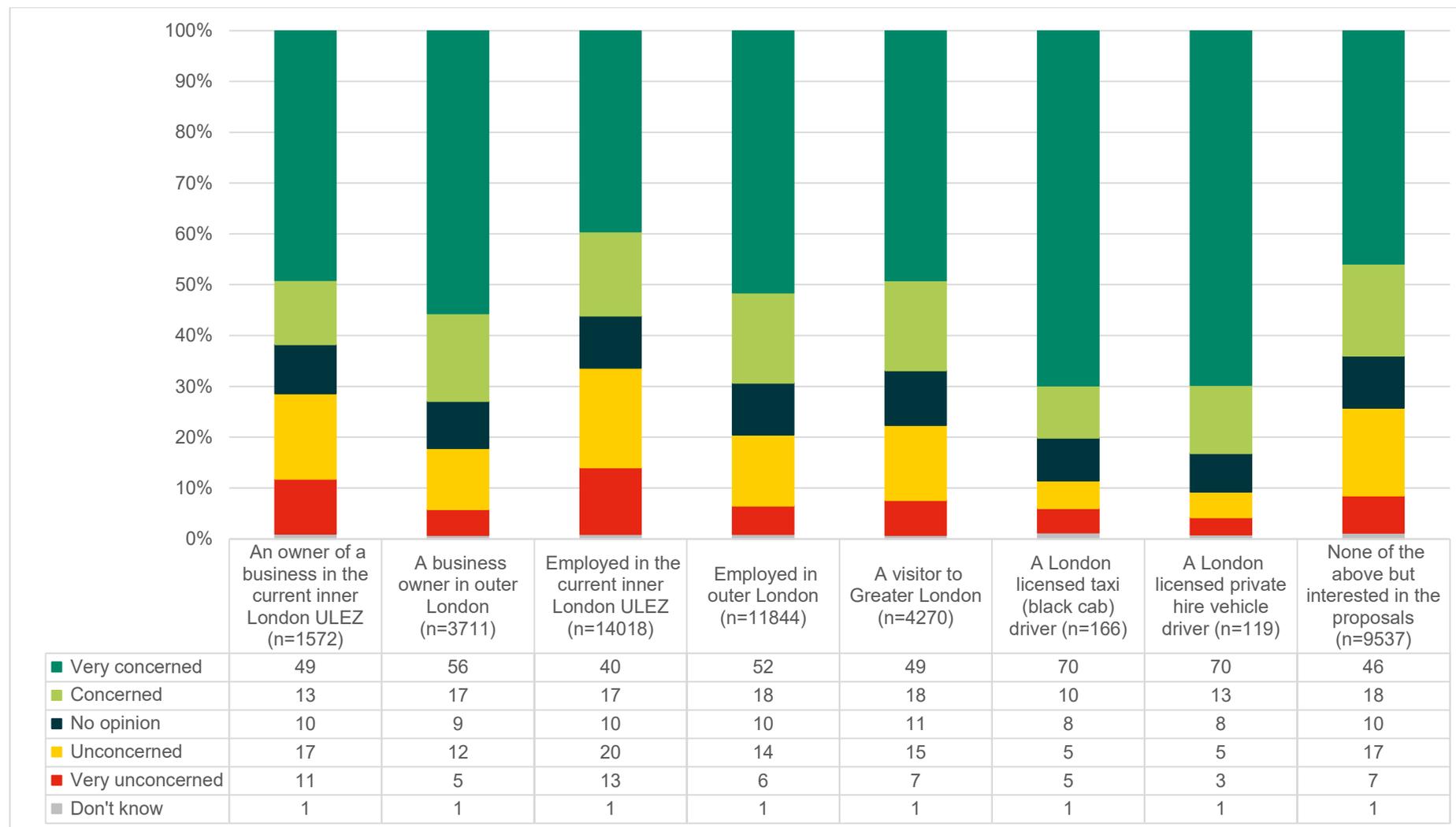
4.17 Concern about use of data and the installation of Automatic Number Plate Recognition (ANPR) cameras

4.17.1 We asked respondents how concerned they were about their data being used and the installation of more ANPR cameras to collect data on vehicle movements in order to enforce an expanded London-wide ULEZ. Results are shown in Table 23 and Figure 13.

Table 23: How concerned are you about use of your data and the installation of more Automatic Number-Plate Recognition (ANPR) cameras to collect information on vehicle movement to enforce an expanded London-wide ULEZ? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very concerned	46	46	46	31
Concerned	17	17	17	21
No opinion	10	10	10	15
Unconcerned	17	17	17	24
Very unconcerned	9	9	9	7
Don't know	1	1	1	3
Total	41,264	41,146	41,136	118
Base: all respondents (41,146 public; 118 stakeholders; 16,649 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 118 stakeholders answered this question therefore the percentages should be treated with caution				

Figure 13: How concerned are you about use of your data and the installation of more Automatic Number-Plate Recognition (ANPR) cameras to collect information on vehicle movement to enforce an expanded London-wide ULEZ?



4.18 Intentions if vehicle not currently compliant with emissions standards

4.18.1 We asked respondents to tell us what they intend to do if The Mayor proceeds with the proposals to expand the ULEZ to outer London, but they do not own a vehicle(s) that is currently compliant with emissions standards. Results are shown in Table 24. These results reflect all responses to the question, regardless of whether the respondent had previously identified their vehicle(s) as compliant or non-compliant.

Table 24: If you own a vehicle(s) that is not currently compliant with emissions standards and we proceed with our proposals, what do you intend to do? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Walk or cycle more	7	7	7	11
Use public transport more	10	10	10	12
Use taxis or private hire vehicles more	4	4	4	4
Use a car club	2	2	2	6
Trade the vehicle in for a compliant one	18	18	18	22
Get rid of the vehicle	12	12	12	12
Pay the charge when using vehicle	21	21	21	27
Not make journeys I would have done	23	23	23	24
Do something else that's not listed	22	22	22	30
Don't know	27	27	27	15
Total	30,715	30,622	30,618	93
Base: all respondents (30,622 public; 93 stakeholders; 27,198 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail. **Only 93 stakeholders answered this question therefore the percentages should be treated with caution Respondents could choose more than one option and therefore percentages will not equal 100 per cent				

4.18.2 Table 25 shows the responses of respondents based on their vehicle ownership and current compliance with the emissions standards for the ULEZ.

Table 25: The intended action if ULEZ proposals proceed, based on whether vehicles owned comply with the emissions standards (%)

	Meet standards	Do not meet standards	Do not own vehicles	Don't know / did not answer
Walk or cycle more	8	4	41	6
Use public transport more	11	6	44	8
Use taxis or private hire vehicles more	5	3	11	4
Use a car club	2	1	9	1
Trade the vehicle in for a compliant one	17	20	11	8
Get rid of the vehicle	10	13	13	7
Pay the charge when using vehicle	16	25	7	15
Not make journeys I would have done	20	26	14	20
Do something else that's not listed	21	23	9	26
Don't know	28	26	23	38
Total	8,637	19,314	1,784	786
Base: all respondents (30,622)				
* Respondents could choose more than one option and therefore percentages will not equal 100 per cent				

4.18.3 Table 26 shows the responses to this question by respondent type, including only those who have vehicles that do not meet emission standards for the ULEZ.

Table 26: The intended action if ULEZ proposals proceed, based on whether vehicles owned comply with the emissions standards (%)

	An owner of a business in the current inner London ULEZ	A business owner in outer London	Employed in the current inner London ULEZ	Employed in outer London	A visitor to Greater London	A London licensed taxi (black cab) driver	A London licensed private hire vehicle driver	None of the above but interested in the proposals
Walk or cycle more	6	2	6	3	3	4	5	5
Use public transport more	7	3	8	5	7	5	3	7
Use taxis or private hire vehicles more	6	3	4	2	3	18	15	3
Use a car club	2	1	2	1	1	5	5	1
Trade the vehicle in for a compliant one	16	19	24	21	14	20	30	19
Get rid of the vehicle	11	13	15	14	8	16	20	14
Pay the charge when using vehicle	39	27	30	21	30	27	25	23
Not make journeys I would have done	23	21	26	22	42	20	43	28
Do something else that's not listed	28	29	22	25	24	25	23	20
Don't know	17	25	23	31	18	27	33	26
Base	535	2493	5001	6981	2479	55	40	4174
Base: Respondents who own at least one vehicle that does not meet the required emissions standards * Respondents could choose more than one option and therefore percentages will not equal 100 per cent								

4.19 Taking further steps to tackle air pollution

4.19.1 We asked respondents how important it is that we take further steps to tackle air pollution in London. Results are shown in Table 27 and Figure 14.

Table 27: How important is it to you that we take further steps to tackle air pollution in London? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very important	37	37	27	42
Important	26	26	30	28
No opinion	11	11	13	11
Unimportant	14	14	16	9
Very unimportant	10	11	12	8
Don't know	1	1	1	2
Total	47,550	47,434	40,849	116

Base: all respondents (47,337 public;176 stakeholders; 10,459 total did not answer this question)
 * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail.
 **Only 117 stakeholders answered this question therefore the percentages should be treated with caution

4.20 Taking further steps to tackle the climate emergency

4.20.1 We asked respondents how important it is that we take further steps to tackle the climate emergency by reducing emissions in London. Results are shown in Table 28 and Figure 14.

Table 28: How important is it to you that we take further steps to tackle the climate emergency by reducing emissions in London? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very important	37	37	27	44
Important	23	24	27	21
No opinion	11	11	13	12
Unimportant	15	15	17	15
Very unimportant	13	13	15	7
Don't know	1	1	1	2
Total	47,454	47,337	40,760	117

Base: all respondents (47,337 public;176 stakeholders; 10,459 total did not answer this question)
 * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail.
 **Only 117 stakeholders answered this question therefore the percentages should be treated with caution

4.21 Taking further steps to tackle traffic congestion

4.21.1 We asked respondents how important it is that we take further steps to tackle traffic congestion in London. Results are shown in Table 29 and Figure 14.

Table 29: How important is it to you that we take further steps to tackle traffic congestion in London? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very important	36	36	26	43
Important	25	25	29	28
No opinion	13	13	15	13
Unimportant	16	15	18	11
Very unimportant	9	9	11	3
Don't know	1	1	1	2
Total	47,473	47,358	40,779	115
Base: all respondents (47,358 public; 115 stakeholders; 10,440 total did not answer this question)				
* Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail.				
**Only 115 stakeholders answered this question therefore the percentages should be treated with caution				

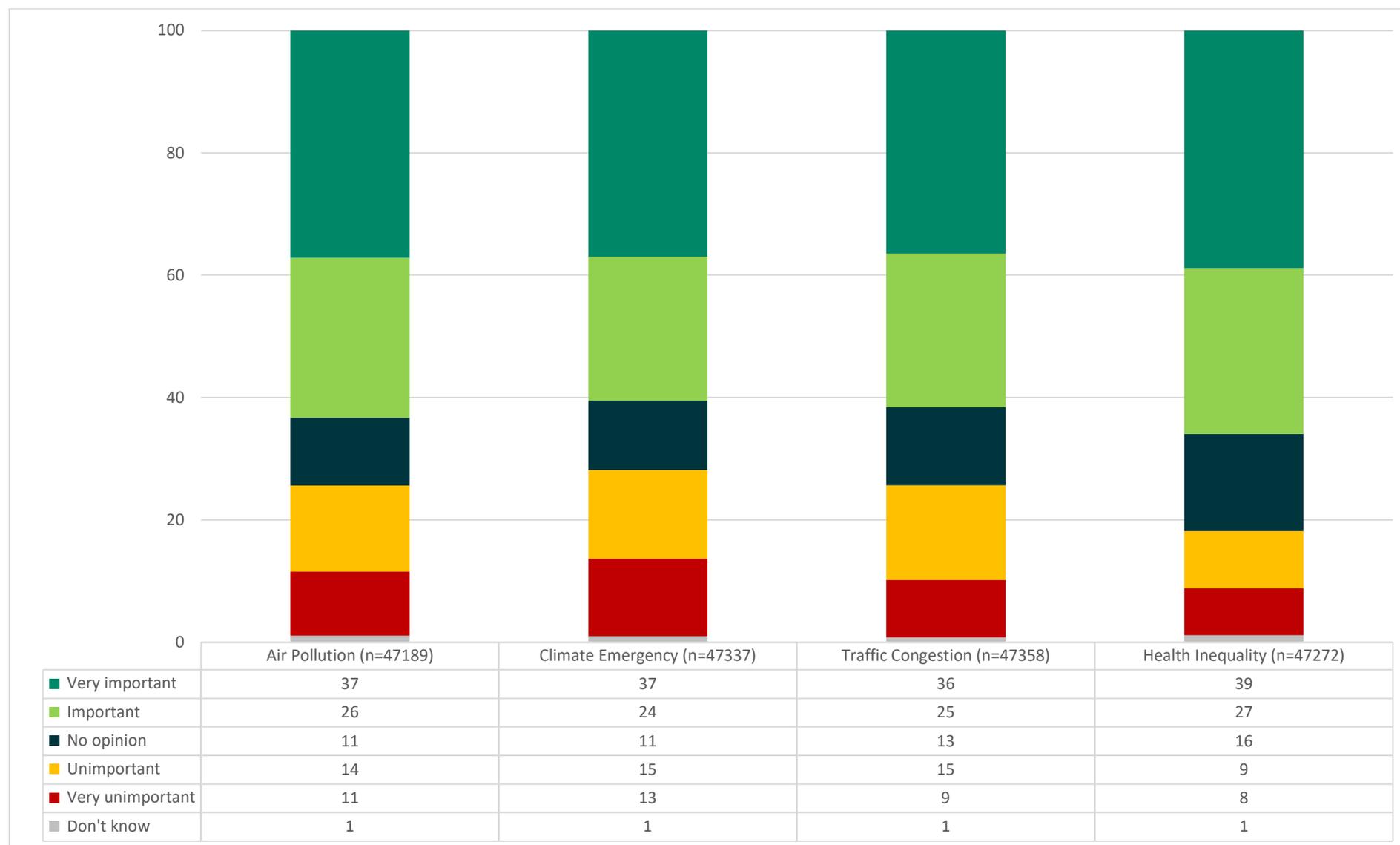
4.22 Taking further steps to improve the health of Londoners and address health inequality

4.22.1 We asked respondents how important it is that take further steps to improve health and address health inequality in London. Results are shown in Table 30 and Figure 14.

Table 30: How important is it to you that we take further steps to improve the health of Londoners? (%)

	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
Very important	39	39	29	42
Important	27	27	32	32
No opinion	16	16	18	15
Unimportant	9	9	11	5
Very unimportant	8	8	9	3
Don't know	1	1	1	3
Total	47,385	47,269	40,698	116
Base: all respondents (47,269 public; 116 stakeholders; 10,525 total did not answer this question)				
* Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 for further detail.				
**Only 116 stakeholders answered this question therefore the percentages should be treated with caution				

Figure 14: How important is it to address the challenges affecting London? (%)



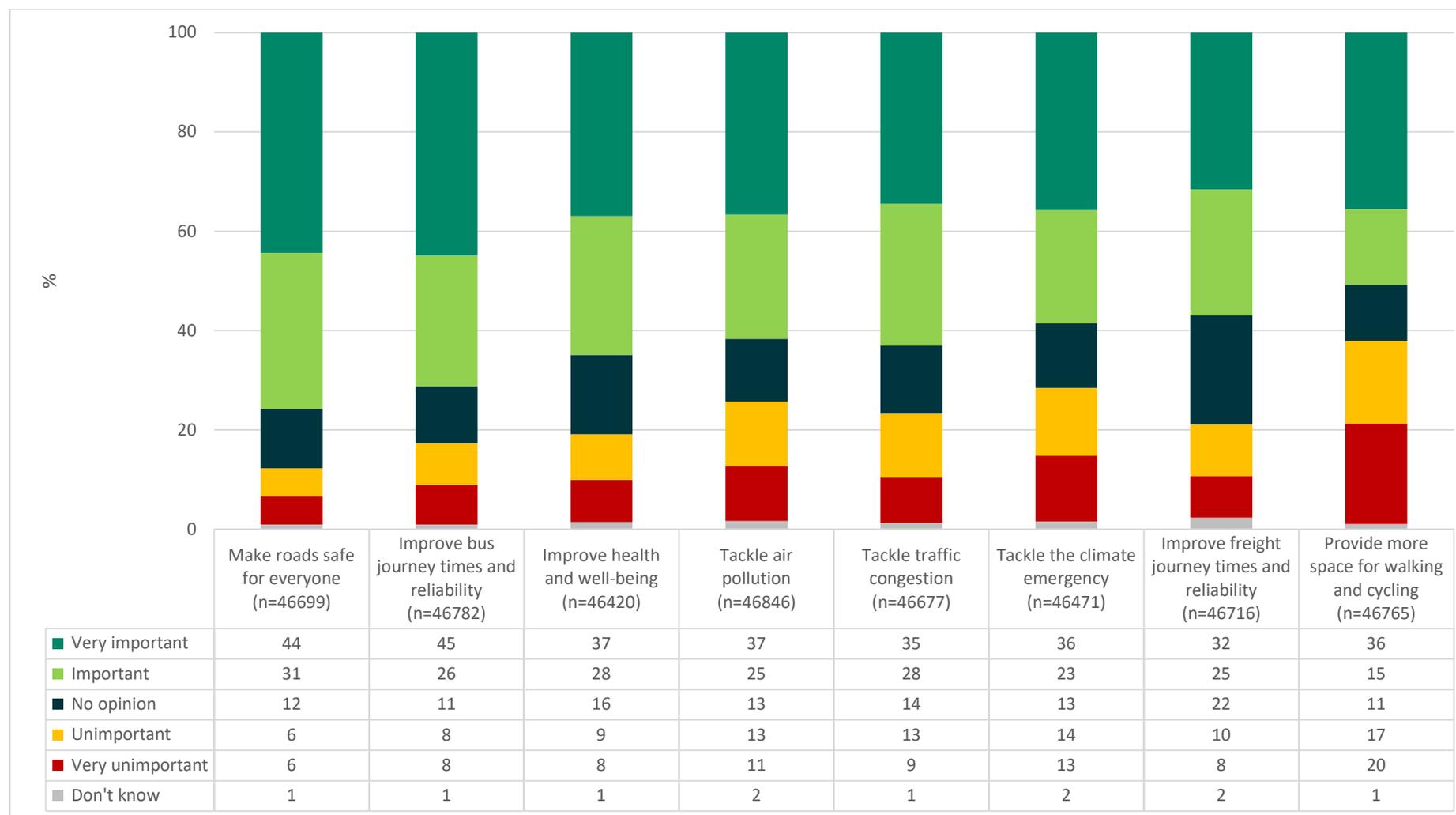
4.23 Addressing challenges with a potential new scheme

4.23.1 We asked respondents to tell us how important it is for a future road user charging scheme to address a number of challenges. Results are shown in Table 31 and Figure 15.

Table 31: Level of importance for each challenge – public (including organised responses) only (%)

	Base (Actual number)	* Number of organised responses (Actual number)	Important (%)	No opinion (%)	Unimportant (%)
Tackle air pollution	46,846	6,530	62	13	24
Tackle the climate emergency by reducing emissions	46,471	6,533	58	13	27
Tackle traffic congestion	46,677	6,531	63	14	22
Improve health and wellbeing	46,420	6,527	65	16	18
Provide more space for walking and cycling	46,765	6,529	51	11	37
Improve bus journey times and reliability	46,782	6,533	71	11	16
Improve journey times and reliability for freight and servicing trips	46,716	6,529	57	22	19
Make road safe for everyone	46,699	6,510	76	12	11
* All organised responses selected "Important"					

Figure 15: Level of importance for a new scheme to address key challenges (%)



4.24 Elements to consider when developing a new scheme

4.24.1 We asked respondents to tell us what elements should be considered as part of a future road user charging scheme in London. Respondents were able to select as many or as few options as they liked. Results are shown in Table 32.

Table 32: Number of respondents selecting each element to be considered in a future road user charging scheme (%)

Element	All responses	Public (includes organised responses*)	Public (excludes organised responses)	Stakeholder **
The type of vehicle (for example car, van, HGV)	55	55	49	66
How polluting the vehicle is	53	53	47	55
The time of day	51	51	44	54
Other costs of driving (fuel duty and Vehicle Excise Duty)	50	50	43	41
The distance driven	48	48	41	48
Household income	48	48	42	39
Where the vehicle is driven in London	46	46	39	51
The number of journeys driven each day, week or month	44	44	37	41
The alternatives available for walking, cycling or public transport	39	39	31	38
Ability to choose between daily charges and pay as you go	36	36	27	31
Total	42,923	42,818	37,878	105
Base: all respondents (42,818 public; 105 stakeholders; 14,987 total did not answer this question) * Only organised responses which included answers to this specific survey questions are included. Not all organised responses responded to each question. See Section 4.3 further detail. **Only 105 stakeholders answered this question therefore the percentages should be treated with caution Respondents could choose more than one option and therefore percentages will not equal 100 per cent				

4.25 Quality of consultation

4.25.1 We asked respondents how they rated the quality of the consultation. Results are shown in Table 33.

Table 33: What do you think about the quality of this consultation? (%)

Component of consultation	Very good	Good	Adequate	Poor	Very poor	N/A
Website structure & ease of finding what you needed	10	24	38	11	11	6
Written information	9	24	38	11	11	7
Maps, images & related diagrams	7	19	34	12	10	19
Online survey format	10	25	38	13	12	3
Website accessibility	9	28	39	8	7	9
Promotional material	4	12	30	12	13	29
Events and drop-in sessions	2	5	16	9	13	56
Base: Website 39,820, Written info 39,452, Maps 39,261, Online survey 39,524, Website accessibility 39,294, Promotional material 39,010, Events 38,929.						

5. Responses to issues raised

5.1. Introduction

5.1.1. We commissioned independent consultants, AECOM, to analyse responses to the consultation survey including three open questions where respondents were able to write free-text.

5.1.2. 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 survey for analysis purposes.

5.1.3. The first open question (question 13) asked respondents for their comments on the scheme proposals (Proposals 1 to 4). The question also asked respondents for any comments on the impact of making these changes and suggestions for mitigations and enhancements. It asked:

- *Please use this space to give us any comments about these proposals or impacts identified as part of the Integrated Impact Assessments. If you have identified any impacts, please let us know any suggestions to mitigate or enhance these*

5.1.4. Another open question (question 21) asked respondents for their comments or suggestions about shaping the future of road user charging in London. It asked:

- *Please use this space to give us any comments or suggestions you have about shaping the future of road user charging in London*

5.1.5. A third open question (question 14), which was around the Mayor's Transport Strategy amendment, is considered in a separate Report to the Mayor, which can be found [here](#). It asked:

- *Please use this space to give us any comments about the proposed revision to the Mayor's Transport Strategy*

5.1.6. The following sections set out the issues raised by stakeholders and other respondents to the consultation in response to questions 13 and 21, alongside our response to each of these issues. This has been split according to question and then further split according to theme. Where an existing TfL response is relevant to the issue raised, we have referenced this. Where additional issues have been raised by stakeholders, these have been summarised at the end of the relevant section.

5.1.7. Sections 5.2 – 5.22 are structured as follows:

- Comments on the scheme proposals (Question 13)
 - o 5.2 General comments
 - o 5.3 Impacts of proposals
 - o 5.4 Discounts and exemptions

- 5.5 Implementation date
- 5.6 Scrappage scheme
- 5.7 Mitigations and suggestions
- 5.8 Penalty Charge Notice for ULEZ and Congestion Charge
- 5.9 Auto Pay administration fee for ULEZ, LEZ and Congestion Charge
- 5.10 Privacy considerations and use of ANPR enforcement cameras
- 5.11 Integrated Impact Assessment
- Comments on shaping the future of road user charging (Question 21)
 - 5.12 General comments
 - 5.13 Operation of future charging schemes
 - 5.14 Boundary for future charging schemes
 - 5.15 Charging
 - 5.16 Public transport
 - 5.17 Active travel and health
 - 5.18 Other suggestions to reduce congestion, improve air quality, and tackle the climate emergency
 - 5.19 Other charging schemes
 - 5.20 Discounts and exemptions
 - 5.21 Impacts
- Other comments and considerations
 - 5.22 Other comments⁴⁰
 - 5.23 Other considerations – Representative YouGov poll on London-wide ULEZ
 - 5.24 Other considerations – Habitat Regulation Assessment Screening

⁴⁰ Responses that relate to the conduct of the consultation or other out of scope issues are grouped together irrespective of which question they were in response to

Comments on the scheme proposals (Proposals 1 to 4)

5.2. General comments

5.2.1. The following section provides a summary of the general comments that were received in relation to the scheme proposals to expand the ULEZ London-wide and extend current ULEZ grace periods (Proposal 1), remove the annual Auto Pay registration fee for the ULEZ, LEZ and Congestion Charge (Proposal 2), increase the Penalty Charge Notice for the ULEZ and Congestion Charge (Proposal 3), and make other minor administrative scheme order changes (Proposal 4). For ease of reading, it is split into three tables with associated stakeholder commentary at the end of the section. The first table contains general comments in support of proposals, the second covers general comments in opposition to the proposals, and the third covers general comments about the operation of ULEZ.

General comments: support

5.2.2. Table 34 provides a summary of the general comments that were received in support of the scheme proposals.

Table 34: Responses to general comments (support)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
A1	C100	Support the expansion of the ULEZ	3783	1574	93	We have noted these comments.
A2	C101	Support the ULEZ but feel that the proposed boundary should differ (e.g. which areas should	782	765	15	The proposed boundary for the London-wide ULEZ is the same as the current LEZ boundary for heavy vehicles. The LEZ boundary has proven to be an effective boundary for the LEZ scheme and provides drivers with appropriate routes to avoid

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		and should not be included)				entering the zone if they do not comply with required emissions standards. There is also existing signage for the LEZ boundary which could be adapted if the proposed London-wide ULEZ is confirmed.
A3	C102	Support / recognise a need for action to address / improve congestion / air quality / climate emergency	2740	1676	1114	We have noted these comments.
A4	C103	More needs to be done to achieve the aims / proposals need to go further (e.g. required standards to be compliant should be higher, should charge all vehicles)	825	765	43	<p>The Mayor considered four potential approaches to tackle the triple challenges of toxic air pollution, the climate emergency and traffic congestion in London. The approaches included expanding the ULEZ London-wide, a clean air charge (a low-level daily charge to all internal combustion engine vehicles driving anywhere in London), expanding the ULEZ London-wide with a clean air charge and a Greater London boundary charge.</p> <p>After considering the options, the Mayor asked TfL to consult on expanding the ULEZ London-wide because he believed it would strike the right balance between</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						maximising the health and environmental benefits for Londoners while minimising the cost to drivers.
A5	C104	Other general comments showing support	45	42	4	We have noted these comments.
A6	C105	Proposals do not provide a long-term solution / plans are needed to address air quality / climate emergency / traffic congestion long-term	242	231	10	<p>When the Mayor announced his intention for us to consult on the expansion of the ULEZ London-wide, he made clear that the long-term and fairest solution to toxic air pollution, the climate emergency and traffic congestion would ultimately be a more sophisticated form of road user charging designed to be simple and fair for customers.</p> <p>This would enable all existing road user charges, such as the Congestion Charge and the ULEZ to be replaced with a single scheme. As part of this consultation, we have asked for views on shaping any potential future road user charging scheme. We are not consulting on any specific future road user charging scheme at this stage. Any proposals which could be developed in the future would be subject to a further public and stakeholder</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>consultation with information provided on detailed scheme proposals and their likely impacts.</p> <p>In the meantime, while our aim is to tackle each of the triple challenges of air pollution, climate emergency and traffic congestion, ULEZ expansion in the near term is expected to be effective in addressing air quality, as well as having secondary benefits for carbon and congestion.</p>

5.2.3. Table 35 provides a summary of the general comments that were received in opposition to the proposals.

Table 35: Responses to general comments (oppose)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
A7	C120	Oppose / disagree with the expansion of the ULEZ	15470	10738	45	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

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>carbon emissions and improving traffic congestion.</p> <p>Without further action to reduce air pollution, it is estimated that around 550,000 Londoners will develop diseases related to poor air quality by 2050, 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_x emissions in outer London from cars by 9.6 per cent (239 tonnes) and from vans by 6.6 per cent (84 tonnes). This is expected to result in an average reduction in NO₂ concentrations in outer London of 1.5 per cent, one per cent in inner London</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						and 0.7 per cent in central London. ⁴¹ This means that over 20,000 additional people could live in areas (mainly in central and inner London) meeting the WHO interim target 2 of 30ug/m ³ NO ₂ as a result of the scheme with about 260,000 people or three per cent of the population still living in areas above this level. In outer London over 300,000 additional people could live in areas that meet the even tighter WHO interim target 3 of 20µg/m ³ .
A8	C121	Oppose / disagree with the existing ULEZ in general / should be abolished	1210	1210	3	In 2019, there were around 4,000 premature deaths in London related to air pollution. The Mayor has a duty to achieve the legal limits for air pollutants in greater London, and reduce exposure, as quickly as possible and by the most effective means. Despite recent improvements in air quality, air pollution remains the biggest environmental risk to the health of all Londoners, with a disproportionate

⁴¹ Population exposure estimates have changed slightly from those presented in the consultation materials due to an update to the distribution of domestic gas emissions. This results in a change of between 0.03 – 0.1 ug/m³ of average London PM_{2.5} and NO₂ concentrations respectively. It does not affect any road traffic vehicle emissions levels reported, and does not change the sense of scale of the impact of the proposed scheme.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>impact on more vulnerable and deprived people.</p> <p>Road transport is the largest individual source of both NO_x and local PM_{2.5} emissions, and one of the greatest contributors to CO₂ emissions in London, which is why this is where the Mayor has focused his efforts. It is also the area where the Mayor has the strongest statutory powers and a track record of delivering. The UK government has identified clean air zones that include charging as the measure it is able to model nationally which will achieve statutory NO₂ limit values in towns and cities in the shortest possible time.⁴²</p> <p>Both the central London ULEZ, introduced in 2019, and the expansion to inner London in 2021 have had significant impacts on air quality in London, providing benefits for the 4 million people who live in the current ULEZ as well as improving air quality outside for those outside the zone.</p>

⁴² <https://www.gov.uk/government/publications/air-quality-clean-air-zone-framework-for-england/clean-air-zone-framework>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>For the central London ULEZ, estimates indicated that by the end of 2019, NO_x emissions from road transport in the central zone reduced by 35 per cent (230 tonnes) compared to a scenario where there was no ULEZ, with a six per cent reduction in CO₂ emissions over the same period. 10 months after implementation, roadside NO₂ concentrations were assessed to be 37 per cent lower than they would have been, meaning people were breathing cleaner air.⁴³</p> <p>Following the expansion of ULEZ to inner London, harmful NO₂ concentrations alongside roads in inner London are estimated to be 20 per cent lower than they would have been without the ULEZ and its expansion. In central London, roadside NO₂ concentrations were assessed to be 44 per cent lower than they would have been without ULEZ. This decrease in concentrations close to roads will have</p>

⁴³ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/central-london-ulez-ten-month-report>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						also led to reduced air pollution in locations away from traffic. ⁴⁴ The expansion of the ULEZ London-wide is also expected to have a positive impact on air quality in outer London, providing benefits for the five million Londoners who live there, as well as those visiting and working in the city. See response A7.
A9	C122	Oppose the expansion of the ULEZ but agree that some action needs to be taken to address / improve congestion / air quality / climate emergency	1262	1261	41	See response A7 & response A8.
A10	C123	Concerns / doubts that the motives of the ULEZ expansion are to achieve the stated aims	2116	2116	13	In 2019, there were around 4,000 premature deaths in London related to air pollution. The Mayor has a legal duty to achieve the legal limits for air pollutants in greater London, and reduce exposure, as quickly as

⁴⁴ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/expanded-ultra-low-emission-zone-six-month-report>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>possible and by the most effective means. Despite recent improvements in air quality, air pollution remains the biggest environmental risk to the health of all Londoners, with a disproportionate impact on Black, Asian and minority ethnic residents, and more vulnerable and deprived people.</p> <p>After considering the options put forward to help reduce emissions from road transport, the Mayor asked us to consult on expanding the current ULEZ London-wide in 2023 because this would strike the right balance between maximising the health and environmental benefits for Londoners while minimising the cost to drivers.</p> <p>While the Mayor's ultimate aim is to tackle each of the triple challenges of air pollution, climate emergency and traffic congestion, the ULEZ expansion in the near term is expected to be effective in addressing air quality, as well as having secondary benefits for carbon and traffic congestion.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
A11	C124	Proposed changes just another tax / money-making scheme / concerns that money raised from charging schemes is not used to improve transport infrastructure	16945	12218	52	<p>See response A7.</p> <p>All revenue from London's road user charging schemes that is not spent on implementation or operational costs must by law be used to facilitate the delivery of the MTS, which includes improving public transport and making enhancements for people walking and cycling.</p> <p>It is expected that the income will reduce as the policy has the desired effect of taking the most harmful and polluting vehicles off the road.</p>
A12	C125	Stop targeting / penalising motorists	2711	2709	11	<p>Road transport accounts for 44 per cent of NO_x emissions, 31 per cent of PM_{2.5} emissions and 28 per cent of CO₂ emissions in London. If we are to improve London's air quality and tackle the climate emergency, it is necessary to take measures to reduce road transport's contribution to these pollutants.</p> <p>The policies in the London Environment Strategy (LES), including the existing ULEZ, are predicted to result in the avoidance of around 300,000 new</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>cases of NO₂ and PM_{2.5} related disease and 1.2 million new air pollution related hospital admissions London-wide by 2050. This equates to a cost saving to the NHS and social care system of £5 billion.</p> <p>However, if no further action beyond the policies in the LES is taken to reduce air pollution, it is estimated that around 550,000 Londoners will develop diseases related to poor air quality by 2050. In this case the cost to the NHS and social care system in London is estimated to be £10.4 billion by 2050.⁴⁵</p>
A13	C126	Waste of resources / money / time	765	765	6	<p>See response A7.</p> <p>The policies in the LES, including the existing ULEZ, are predicted to result in the avoidance of around 300,000 new cases of NO₂ and PM_{2.5} related disease and 1.2 million new air pollution related hospital admissions London-wide by 2050. This equates to a cost saving to the NHS and social care system of £5 billion, demonstrating the value of</p>

⁴⁵ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/modelling-long-term-health-impacts-air-pollution-london>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>policies directed at improving air quality.</p> <p>We always seek to deliver the infrastructure needed to operate our road user charging schemes in the most cost-effective way possible.</p>
A14	C127	Concerns about the cost of implementation / enforcement of ULEZ (e.g. that the cost will be too high)	593	593	21	<p>The cost of the scheme proposal based on current assumptions is estimated at c. £159.5m. This includes costs of signage, detection and enforcement infrastructure and systems, marketing, project overheads and risk. We are expecting to generate an incremental net operating surplus of c.£200m with a range +/- c.50 per cent in the first full year of operation.</p> <p>All revenue from London's road user charging schemes that is not spent on implementation or operational costs must by law be used to facilitate the delivery of the MTS, which includes improving public transport and making enhancements for people walking and cycling.</p> <p>Our delivery and operational teams work hard to ensure the cost of</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						implementation and enforcement offers good value for money.
A15	C128	ULEZ expansion is not necessary to address / improve congestion / air quality / climate emergency	2611	2610	25	<p>In 2019, there were around 4,000 premature deaths in London related to air pollution. The Mayor has a duty to achieve the legal limits for air pollutants in greater London, and reduce exposure, as quickly as possible and by the most effective means. Despite recent improvements in air quality, air pollution remains the biggest environmental risk to the health of all Londoners, with a disproportionate impact on more vulnerable and deprived people. Alternatives such as focussing only on zero emission buses, scrappage only, or installing more EV infrastructure will not bring about the scale and pace of change needed.</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</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>estimated that around 70,000 will switch to compliant vehicles and the rest will change mode, change destination to avoid London, or not travel.</p> <p>This results in an estimated reduction in NOx emissions from cars in outer London of 9.6 per cent (239 tonnes) and a reduction from vans of 6.6 per cent (84 tonnes). London-wide, reductions in road transport NOx emissions are estimated to be 5.4 per cent, equivalent to 362 tonnes of NOx.</p> <p>The proposed expansion will also contribute to reducing carbon emissions and traffic congestion. There is an estimated 1.4 per cent reduction in carbon emissions from cars in outer London with the expansion, compared to the 2023 baseline without the expansion. The London-wide ULEZ is also expected to result in a one per cent reduction in total car kilometres in outer London.</p>
A16	C129	Other traffic measures cause congestion / not	2317	2313	9	In terms of people movement, private cars are the least efficient use of road space. A single 3.5 metre lane can

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		volume of traffic (e.g. traffic lights, one-way systems, LTNs, cycle lanes etc)				<p>potentially move 2,000 people per hour in mixed traffic (several categories of vehicles sharing and moving on same carriageway), 9,000 people per hour by bus in a regular bus lane, 14,000 cycles or 19,000 pedestrians⁴⁶. By reducing traffic, we could allocate more space to these more efficient and sustainable modes. In turn, by moving people more efficiently through London's limited street space, we could ensure there is sufficient capacity for essential freight and other trips that still need to be made by car or other vehicles.</p> <p>We have invested in measures to improve conditions for walking, cycling and public transport. Monitoring shows that this is having a positive impact:</p> <ul style="list-style-type: none"> - We have supported boroughs in their delivery of LTNs. More than 100 low traffic neighbourhood (LTN) schemes have been delivered across London, making it safer and easier for residents and families to

⁴⁶ The Future of Mobility, Government Office for Science 2019:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/780868/future_of_mobility_final.pdf

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>get around their local area on foot and by bike</p> <ul style="list-style-type: none"> ○ Data from TfL commissioned surveys shows increased active travel levels as a result of LTN implementation ○ Pan-London analysis conducted by the University of Westminster using police data showed the traffic-related injuries within LTNs reduced by half in comparison to the background trend, with no statistically significant change in injuries on LTN boundary roads⁴⁷ ○ Analysis by Centre for London points to overall reductions in traffic, as increases in traffic on boundary roads tend to be smaller than decreases within the LTN. Where there is traffic displacement, the Mini Hollands experience suggests that it tends to reduce over time⁴⁸

⁴⁷ Delivering the Mayor's Transport Strategy 2021/22: <https://content.tfl.gov.uk/tfl-mts-update-14-july-2022-acc.pdf>

⁴⁸ Street Shift: The Future of Low-Traffic Neighbourhoods: <https://www.centreforlondon.org/wp-content/uploads/2022/06/CFL-StreetShift-LTNs-Final.pdf>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<ul style="list-style-type: none"> ○ Studies have found no evidence that response times inside the LTNs or on boundary roads were adversely affected for fire and rescue services.⁴⁹ - There are now more than 500 School Streets in London <ul style="list-style-type: none"> ○ An in-depth study of five School Streets observed a reduction in the number of motorised vehicles and vehicle speeds, and an increase in the number of people cycling during closure periods.⁵⁰ - Where investment has been made, we continue to see large increases in cycling locally.⁵¹ - In 2021/22, we worked with boroughs to deliver seven kilometres of new and improved bus

⁴⁹ Goodman, A., Laverty, A.A. & Aldred, R. (2020). *The impact of Introducing a Low Traffic Neighbourhood on Fire Service Emergency Response Times, in Waltham Forest London*. Findings, December. Available at: <https://doi.org/10.32866/001c.18198>; Goodman, A., Laverty, A.A., Thomas, A. & Aldred, R. (2021). *The Impact of 2020 Low Traffic Neighbourhoods on Fire Service Emergency Response Times, in London, UK*. Findings, May. Available at: <https://doi.org/10.32866/001c.23568>; London Fire Brigade (2021). *Fire Facts – Incident response times 2021*. Available at: <https://data.london.gov.uk/dataset/incident-response-times-fire-facts>

⁵⁰ <https://content.tfl.gov.uk/getting-to-know-school-streets-case-studies-2022.pdf>

⁵¹ Strategic overview of cycling in London Update for the Customer Service and Operational Performance Panel February 2021: <https://content.tfl.gov.uk/csopp-20210224-public.pdf>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						lanes on the TLRN and borough roads. - We have generated almost 8,800 hours of savings for bus passengers through prioritising buses at traffic signals as part of our Healthy Streets Signals Programme. ⁵²
A17	C130	We received 404 other comments opposing the ULEZ which we have noted. Comments included: - existing ULEZ has not been around long enough to understand its impact - journeys will be longer as people avoid the charge	396	396	8	<u>Our response to 'Existing ULEZ has not been around long enough to understand its impact'</u> In addition to the monitoring results we have from launching the central London ULEZ scheme in 2019, the Expanded Ultra Low Emission Zone Six Month Report ⁵³ shows that six months on from the ULEZ expansion to inner London, and over a year on from the enforcement of tighter LEZ standards London-wide, the data indicates that these schemes are having a significant impact on reducing the number of older, more polluting vehicles seen driving in London and the levels of

⁵² Delivering the Mayor's Transport Strategy 2021/22: <https://content.tfl.gov.uk/tfl-mts-update-14-july-2022-acc.pdf>

⁵³ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/expanded-ultra-low-emission-zone-six-month-report>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>- the charge discriminates against disabled people</p>				<p>harmful pollution Londoners are exposed to.</p> <p><u>Our response to ‘Journeys will be longer as people avoid the charge’</u></p> <p>85 per cent of vehicles seen driving in outer London already meet the ULEZ standards on an average day and therefore would not need to re-route to avoid the charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p>The expansion of ULEZ is expected to reduce the number of non-compliant cars from 160,000 to around 46,000 at the end of 2023. It is estimated that around 70,000 will switch to compliant vehicles and the rest will change mode, change destination to avoid London, or not travel.</p> <p><u>Our response to ‘The charge discriminates against disabled people’</u></p> <p>The MTS sets out how the Mayor is working, through TfL, to enhance</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>London's streets and public transport network to enable disabled and older people to more easily travel spontaneously and independently, make the transport system navigable and accessible to all, reduce the additional journey time that disabled and older users can experience on public transport and reduce their need to rely on cars to get around.</p> <p>After the introduction of ULEZ to inner London in October 2021, we provided support to disabled people through the extension of the disabled tax class vehicle exemption grace period until October 2025. For the previous scheme, the Mayor also provided £61 million to fund scrappage schemes, targeted at low income and disabled Londoners, small businesses and charities.</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p>

General comments: operation of ULEZ

5.2.4. Table 36 provides a summary of the general comments that were received about the operation of the ULEZ.

Table 36: Responses to general comments (operation of the ULEZ)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
A18	C150	ULEZ charge should be lower (i.e. lower than £12.50 per day)	588	587	1	<p>The charge level of £12.50 has proved successful for both the central and the inner London ULEZ. It provides an effective incentive for frequent drivers of non-compliant vehicles to change their vehicles or mode of transport while still allowing infrequent journeys to be affordable.</p> <p>Estimates indicate that by the end of 2019 NO_x emissions from road transport in the central zone have reduced by 35 per cent (230 tonnes) compared to a scenario without ULEZ. Six months after the launch of the ULEZ expansion to inner London in 2021, nearly 94 per cent of vehicles seen driving in the whole zone meet the standards on an average day, up from 87 per cent in the weeks before the zone expanded and up from 39 per cent in 2017 when impacts associated with the ULEZ began.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						If we were to reduce the charge level this would have a detrimental impact on its effectiveness at encouraging a switch to cleaner vehicles, and therefore its effectiveness at reducing air pollution from transport.
A19	C151	ULEZ charge should be higher (i.e. higher than £12.50 per day)	88	88	0	See response A18.
A20	C152	Comments about the time the ULEZ is in effect / concerns about multiple charges within a 24-hour period	234	234	3	<p>The ULEZ scheme currently operates 24 hours a day, seven days a week excluding Christmas Day. To maximise the impact of the scheme, given that air pollutants are emitted from vehicles at all times they are in use, operating the scheme 24 hours a day is deemed appropriate.</p> <p>In response to concerns about multiple charges, a night worker driving in the zone at 10pm with a non-compliant car, would need to pay £12.50. They would then pay another £12.50 when driving the next day at 5am. Upon driving again that evening they will not be charged because it is the same day. For those working shifts over consecutive days, the amount they pay should work out similarly. This impact may</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						be worse for those working other shift patterns.
A21	C153	Concerns that the required standards to be compliant are too high / should be lower	593	593	2	<p>We have considered a range of options when deciding the next steps to take in addressing London's air quality challenge. In the short-term, expanding the ULEZ London-wide will have the biggest effect on emissions relative to the cost to Londoners as a whole, as well as helping to tackle the climate emergency and traffic congestion.</p> <p>The ULEZ standards reflect the points at which new Euro standards resulted in a very large drop in permitted emissions compared to previous standards. For example, Euro 5 diesel cars were permitted to emit 125 per cent more NO_x than Euro 6 diesel cars and Euro 3 petrol cars were permitted to emit 90 per cent more NO_x than Euro 4 petrol cars. The emission standards regulating NO_x and PM for diesel engines have generally lagged behind those for petrol engines, which is why the ULEZ standard for diesel vehicles is set at the newer Euro 6 standard as opposed to Euro 4 for petrol vehicles.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>It is important to strike a balance between air quality improvements (achieved through vehicle emissions standards) and the impact on individuals and businesses in terms of the costs of meeting these standards.</p> <p>The current emissions standards help to achieve this balance and are not proposed to be changed as part of the expansion of the ULEZ London-wide.</p>
A22	C154	<p>Other comments about the operation of the ULEZ</p> <p>We received 630 other comments about the operation of the ULEZ which we have noted.</p> <p>Suggestions included:</p> <ul style="list-style-type: none"> - Charges should be based on miles travelled / charge penalises 	630	629	29	<p><u>Our response to ‘Charge should be based on miles travelled / charge penalises light users of vehicles’</u></p> <p>We have considered a range of options when deciding the next steps to take in addressing London’s air quality challenge. In the short-term, expanding the ULEZ London-wide will have the biggest effect on emissions relative to the cost to Londoners as a whole, as well as helping to tackle the climate emergency and traffic congestion.</p> <p>Experts have found that London will need a new kind of road user charging system by the end of the decade, alongside other measures, to achieve net zero carbon by 2030 and address air pollution and traffic</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>light users of vehicles</p> <ul style="list-style-type: none"> - Major trunk roads should be removed from ULEZ - Signage should be improved to give people the opportunity to divert - Non-compliant vehicles should be banned instead of charged - MOT tests should be used to determine the pollution levels of vehicles - Charge should be lower for outer London / increase 				<p>congestion, however the technology to implement such a scheme is not yet ready. We have engaged with public and stakeholders about their views on the elements that should be considered for inclusion in the design of a potential scheme, such as distance travelled. The outputs of that engagement are presented in Section 4.22 and 5.15 of this report. Any future proposals to introduce a new scheme would be subject to a further public and stakeholder consultation with information on detailed scheme proposals and their impacts.</p> <p><u>Our response to 'Major trunk roads should be removed from ULEZ'</u></p> <p>54 per cent of London's road traffic is on major roads.⁵⁴ If these were not included within the ULEZ, the benefits of the scheme would be significantly reduced, particularly for residents living adjacent to major roads.</p> <p><u>Our response to 'Signage should be improved to give people the opportunity to divert'</u></p>

⁵⁴ DfT 2020.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>charge in existing ULEZ instead</p> <ul style="list-style-type: none"> - Charge should only apply to non-residents - Payment period should be extended - Key workers should be supported in helping them use public transport or purchase a ULEZ compliant vehicle - There should be a transition period for the implementation of an expansion to the zone - Payments should be possible by non-digital methods 				<p>Clear signage will be provided on the approach roads typically at approximately one mile before the expanded boundary. In addition, existing direction signs at appropriate junctions will be amended to indicate which roads lead onward to nearby points of entry on the expanded boundary. Within the expanded zone, there would be 'repeater' signs reminding drivers that they are driving within the zone.</p> <p><u>Our response to 'Non-compliant vehicles should be banned instead of charged'</u></p> <p>There are no legal powers for the Mayor, TfL or boroughs to ban outright the purchase or sale of vehicles, which requires national legislation. In addition, there is no single traffic authority for London that could ban the use of particular vehicles on a large-scale or London-wide basis. Only boroughs as traffic authorities for their roads can ban the use of vehicles (as they have done with Low Traffic Neighbourhoods) via individual Traffic Regulation Orders (TROs). TfL can only do the same regarding the TfL Road Network (TLRN) for which it is traffic authority.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p><u>Our response to 'MOT tests should be used to determine the pollution levels of vehicles'</u></p> <p>The ULEZ specifically targets the air pollutants which are most harmful to human health: nitrogen oxides (NOx) and particulate matter (PM). These are regulated by the Euro standards, which require vehicle engines to be designed to meet emission limits for these pollutants. Compliance with these limits is precisely measured before engines can be put on the market.</p> <p>In contrast, the MOT test is an indicator of the general health of the engine and emissions control system and does not give precise measurements of the emissions performance of a vehicle or measure NOx or PM emissions.</p> <p><u>Our response to 'Charge should be lower for outer London / increase charge in existing ULEZ instead'</u></p> <p>Air pollution is not, and never was, just a central or inner London problem. In 2019, air pollution contributed to the premature deaths of around 4,000 Londoners showing that we must go further and faster to</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>safeguard human health. The greatest number of those premature deaths were in outer London boroughs, because even though pollution is lower in the outer boroughs, there is a higher proportion of older people in these areas, who are more vulnerable to the impacts of air pollution.</p> <p><u>Our response to 'Charge should only apply to non-residents'</u></p> <p>The primary objective of the ULEZ is to reduce emissions and improve air quality. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme. If London residents were not included within the ULEZ, the benefits of the scheme would be significantly reduced.</p> <p><u>Our response to 'Payment period should be extended'</u></p> <p>Customers can pay by midnight on the third day following the journey or up to 90 days in advance. This is considered sufficient to enable customers to pay after driving in the ULEZ. The proposal to remove the annual £10 Auto Pay registration fee per vehicle will also enable customers to set up an</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>Auto Pay account free-of-charge. Payment would be taken automatically when their vehicle is detected in the zone and they would not be at risk of forgetting to pay the charge or receiving a PCN.</p> <p><u>Our response to 'Key workers should be supported in helping them use public transport or purchase a ULEZ compliant vehicle'</u></p> <p>We are committed to ensuring that our public transport network is safe, affordable and accessible. Improving the accessibility of London's extensive public transport services helps to support and enhance the quality of life of Londoners.</p> <p>Should the ULEZ be expanded London-wide following consultation, the Mayor has committed to help those eligible through a large-scale and targeted scrappage scheme. See section 6.1.</p> <p><u>Our response to 'There should be a transition period for the implementation of an expansion to the zone'</u></p> <p>There is expected to be a period of around nine months between the Mayor's decision</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>and the introduction of the London-wide ULEZ, with the awareness of the possibility of an expansion since March 2022.⁵⁵ With fewer people affected by the London-wide ULEZ thanks to already high compliance levels, this is considered to be sufficient to allow owners of non-compliant vehicles to upgrade their vehicles or change mode.</p> <p><u>Our response to 'Payments should be possible by non-digital methods'</u></p> <p>Payment of the ULEZ charge can be made by phone if customers prefer. The customer services contact centre is open Monday to Friday between 8am and 8pm.</p>

Other stakeholder comments

5.2.5. We have noted these additional comments from stakeholders that are not included in the tables above.

5.2.6. Councillor Colin Smith (LB Bromley) and Councillor David Leaf (LB Bexley) expressed concern that the proposals would lead to wider road user charging. **Our response:** *Experts have found that London will need a new kind of road user charging system by the end of the decade, alongside other measures, to achieve net zero carbon by 2030 and address air pollution and traffic congestion. This could replace existing road user charging schemes, such as the Congestion Charge, ULEZ and LEZ, with a simple and fair scheme for customers. We have engaged public and stakeholder views on the*

⁵⁵ <https://www.london.gov.uk/press-releases/mayoral/mayor-sets-out-london-wide-ulez-plans>

elements that should be considered for inclusion in the design of a potential scheme, such as vehicle type, distance travelled and time of day. The outputs of that engagement are presented in Section 4.22 and 5.15 of this report. We are not consulting on any specific future road user charging scheme at this stage. Any future proposals to introduce a new scheme would be subject to a further public and stakeholder consultation with information on detailed scheme proposals and their impacts. Consideration of concepts relating to road user charging has not been limited to the London context. In response to wider road user charging, the House of Commons Transport Committee report on Road Pricing (January 2022)⁵⁶ concluded that a failure to replace existing motoring taxes with an alternative road charging mechanism will lead to either decreased investment in public services, including road maintenance, or increased Government borrowing.

- 5.2.7. Westminster City Council expressed support for the proposals conditional on retaining the £12.50 charge, a fully formed scrappage scheme, and retention of discounts and exemptions, including for disabled drivers. **Our response:** *Any future change to the ULEZ charge would be subject to consultation. Our response to issues relating to a scrappage scheme and discounts and exemptions are set out in 5.6 and 5.4 respectively.*
- 5.2.8. LB Hammersmith and Fulham supported ULEZ expansion, however they did not see it as a long-term solution to addressing air quality, climate change and congestion, noting that reductions would be finite as new vehicles and technology become more prevalent. Campaign for Better Transport viewed the proposed ULEZ expansion as a necessary stepping stone for future road user charging. Lambeth Living Streets suggested that there should be additional charges based on a zonal system and that drivers should be charged each time they crossed into or out of these zones. **Our response:** *The supporting document for the consultation noted that further action will be needed in the long-term to achieve the necessary levels of traffic and emissions reductions to continue to improve Londoners' health by reducing toxic air pollution, helping to meet net zero carbon targets to tackle the climate emergency and reducing traffic congestion. This may require a new kind of road user charging system implemented by the end of the decade. This could include replacing existing charges with a road user charging scheme that uses more sophisticated technology to make it as simple and fair as possible for customers. As part of this consultation, we engaged on shaping any potential future of road user charging scheme. Responses to this are presented in 4.19-4.24 and 5.12-5.21.*
- 5.2.9. LB Bromley opposed the proposals, questioning the evidence base for the benefits for outer London and expressing concern that there has not been sufficient time to consider the merits of the existing scheme. **Our response:** *Reductions in toxic emissions have been slower in outer London than in the rest of London. The proposed London-wide ULEZ is*

⁵⁶ <https://publications.parliament.uk/pa/cm5802/cmselect/cmtrans/789/report.html>

expected to reduce NO_x vehicle emissions in outer London by 6.9 per cent (323 tonnes) taking into account all road transport emissions. Both the central London ULEZ, introduced in 2019 and the expansion to inner London in 2021 have had significant impacts on air quality in London and monitoring reports for both schemes have been published showing an estimates reduction in roadside NO₂ concentrations of 20 per cent in inner London and 44 per cent in central London than without the schemes.⁵⁷ It is estimated that approximately 60 per cent of deaths replaced to air pollution in London are in outer London boroughs (equating to approximately 2,600 premature deaths) mainly due to the higher proportion of elderly people in these areas who are more vulnerable to the impacts of air pollution. The main benefits of the proposed scheme are in outer London where improvements in pollution has been less than other areas of London. See response A7, response A8 and response A17.

- 5.2.10. LB Richmond was concerned that TfL's change in position on the efficacy of an extended ULEZ (from the case made in June 2018) made it challenging to separate the proposals from TfL's financial challenges. **Our response:** *These proposals have been made to help improve air quality, tackle climate change and reduce congestion. Our existing schemes have proven to be effective. Six months after the expansion into inner London, harmful NO₂ concentrations alongside roads in inner London were estimated to be 20 per cent lower than they would have been without the ULEZ and its expansion.⁵⁸ However, in September 2021, the World Health Organization (WHO) updated its recommended guidelines for air pollutants, reflecting its assessment of the overwhelming evidence of the adverse health impacts of air pollution, even at low levels. While there has been a significant reduction in the number of London residents who live in areas which exceed the UK legal limits (40 µg/m³) for NO₂ since 2016, almost a third of London residents live in areas which exceed 30 µg/m³, the level 2 interim target set by the WHO, and all Londoners live in areas which exceed the guideline limit of 10 µg/m³. Similarly, while all London residents live in areas that are within the PM_{2.5} UK legal limits (25 µg/m³), 88 per cent of Londoners still live in areas which do not meet the lowest interim target (10 µg/m³), and all Londoners live in locations where concentrations exceed the guideline limit of 5 µg/m³. Air pollution is not, and never was, just a central or inner London problem. In 2019, air pollution contributed to the premature deaths of around 4,000 Londoners showing that we must go further and faster to safeguard human health. The greatest number of those premature deaths were in outer London boroughs, because even though pollution is lower in the outer boroughs, there is a higher proportion of older people in these areas, who are more vulnerable to the impacts of air pollution. All revenue from London's road user charging schemes that is not spent on implementation or operational costs must by law be used to facilitate the delivery of the MTS, which includes improving public transport and making enhancements for people walking and cycling.*

⁵⁷ <https://tfl.gov.uk/corporate/publications-and-reports/ultra-low-emission-zone>

⁵⁸ Expanded Ultra Low Emission Zone – Six Month Report including Low Emission Zone – One Year Report (2022)
https://www.london.gov.uk/sites/default/files/expanded_ultra_low_emission_zone_six_month_report.pdf

- 5.2.11. LB Hillingdon suggested the proposal was a blunt tool as it treats less busy local streets in the same way as trunk roads. **Our response:** *54 per cent of London's road traffic is on major roads with the remainder on minor roads.⁵⁹ If either were not included within the ULEZ the benefits of the scheme would be significantly reduced.*
- 5.2.12. Centurion Traffic Management suggested more consideration needs to be given to businesses using specialist vehicles for which lower emission versions do not exist yet. **Our response:** *The purpose of the ULEZ is to accelerate the adoption of the cleanest vehicle types. However, it is not necessary to move to an electric vehicle to meet the ULEZ standard (although that may be desirable). Conventional diesel vehicles are permitted to drive in the zone. For those that do not meet the necessary Euro 6/VI standard, we have worked with the Energy Saving Trust to ensure that a range of CVRAS approved retrofit systems are available, including for vehicles under 3.5 tonnes. There is also the option to pay a daily charge for non-compliant vehicles. This may be preferable for vehicles that do not visit the zone regularly.*
- 5.2.13. The London Asthma Leadership Group for Children and Young People (LALIG) noted that the current ULEZ engine standards do not guarantee that on-road emissions will comply with the legal limits because the testing regime for older Euro standards did not replicate real-world driving conditions. **Our response:** *The ULEZ specifically targets the air pollutants which are most harmful to human health: nitrogen oxides (NOx) and particulate matter (PM). These are regulated by the Euro standards, which require vehicle engines to be designed to meet emission limits for these pollutants. Compliance with these limits is precisely measured before engines can be put on the market. See response A22. It is correct that emissions test cycles were less representative of real-world driving prior to the adoption of the Worldwide Harmonised Light Vehicle Test Procedure (WLTP) for light duty vehicles supported by Real Driving Emissions test (RDE) and the World Harmonized Transient Cycle test (WHTC) for heavy duty engines, supported by on-highway verification of emissions. However, the difference in consequential emissions has been accounted for in the air quality modelling of scheme benefits.*
- 5.2.14. Greenwich Co-operative Development Agency highlighted difficulty checking whether you have entered the zone on the TfL website, suggesting that people may pay the charge when they do not have to. **Our response:** *Charging zones are clearly signposted and drivers can check whether their destination is within the zone online using the postcode checker or downloadable maps: <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/ulez-where-and-when>. The proposal to remove the annual £10 Auto Pay registration fee per vehicle will also enable customers to set up an Auto Pay account free-*

⁵⁹ DfT 2020

of-charge. Payment would be taken automatically if their vehicle is detected in the zone and they would not be at risk of forgetting to pay the charge or receiving a PCN.

5.3. Impacts of the proposals

5.3.1. This section contains summaries of the comments that were received in relation to the impacts of the scheme proposals. It is split into three tables with associated stakeholder commentary at the end of the section. The first table contains the wider impacts of the proposals, the second covers the financial and economic impacts, and the third is the social impacts of the proposals.

Wider impacts (including environment impacts)

5.3.2. Table 37 provides a summary of the comments that were received around the wider impacts (including environment impacts) of the proposals.

Table 37: Responses to comments made about wider impacts (including environment impacts) of the proposals

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
B1	C170	ULEZ expansion will have no impact to air quality / health and wellbeing	1981	1978	34	The proposed London-wide ULEZ is expected to reduce annual NO _x vehicle emissions in outer London by 6.9 per cent (323 tonnes) taking into account all road transport emissions. There is expected to be a 1.5 per cent (7.8 tonnes) annual overall reduction in PM _{2.5} emissions from road transport in London. Improvements in air quality overall means that with the expansion of the ULEZ in

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>place it is estimated that less than 3,000 people in Greater London will be living in areas exceeding legal limits for NO₂.</p> <p>As a result of improvements in air quality, nearly 25,000 additional Londoners would live in areas meeting the World Health Organization interim target for NO₂ concentrations of 30 µg/m³ and 335,000 additional Londoners would live in areas meeting the tighter interim target of 20 µg/m³.</p> <p>In addition, almost all of London's most deprived communities would experience an improvement in air quality; 99.9 per cent would live in areas in areas with improved NO₂ concentrations and 97 per cent would live in areas with improved PM_{2.5} concentrations (albeit marginal).</p>
B2	C171	ULEZ expansion will have a positive impact on air quality / health and wellbeing / will improve it	999	184	38	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
B3	C172	ULEZ expansion will make air quality / pollution / health and wellbeing worse	320	318	2	See response B1. There are a few roads in inner London where the ULEZ expansion would have a greater than one per cent increase in PM _{2.5} emissions for all vehicles compared to the 2023 baseline. This is likely a result of a small number of trips re-distributing and re-routing as a result of the expanded zone. However, there is a negligible impact on PM _{2.5} car emissions in inner London (<0.1 per cent increase) overall.
B4	C173	ULEZ expansion will have no impact on climate emergency / impact to the environment	468	467	19	Nearly a quarter of London's CO ₂ emissions come from cars and goods vehicles ⁶⁰ . Rising CO ₂ emissions will have negative and potentially irreversible consequences for global warming, resulting in rising sea levels and extreme weather conditions. The proposed ULEZ expansion London-wide if approved would encourage a shift to active, efficient and sustainable modes. This shift would help to deliver a reduction in carbon emissions.

⁶⁰ LAEI 2019

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>Overall, the proposed expansion would deliver a 0.4 per cent reduction in annual London-wide carbon emissions from road transport equivalent to 23,000 tonnes, including a 0.9 per cent reduction in carbon emissions from cars.</p> <p>The greatest potential reduction is from cars in outer London, a reduction of 1.4 per cent in carbon emissions compared to 2023 baseline without the expansion. Carbon emissions are also expected to reduce by 1.6 per cent outside London⁶¹, equivalent to 43,000 tonnes of carbon.</p>
B5	C174	ULEZ expansion will have a positive impact on climate emergency / impact to the environment	649	35	22	We have noted these comments.
B6	C175	ULEZ expansion will make climate emergency / impact to the environment worse	80	80	2	See response B4.

⁶¹ In the area covered by the LAEI, from the GLA boundary up to and including the M25.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
B7	C176	ULEZ expansion will have no impact on congestion	689	689	11	<p>Monitoring of the existing ULEZ following its expansion in 2021 shows that there were 21,000 fewer vehicles seen in the zone on an average day (a reduction of two per cent) and early estimates suggest traffic flows are around two per cent lower than the weeks before the expansion launched.⁶²</p> <p>The proposed expansion of the ULEZ London-wide is expected to reduce London-wide car kilometres by around 0.5 per cent. The overall reduction in London-wide car kilometres is modest as non-compliant car kilometres are estimated to be a small proportion of overall car kilometres. The expansion of ULEZ is expected to reduce the number of non-compliant cars from 160,000 to around 46,000 at the end of 2023. It is estimated that around 70,000 will switch to compliant vehicles and the rest will change mode, change destination to avoid London, or not travel.</p>

⁶² <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/expanded-ultra-low-emission-zone-six-month-report>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						As a result of the expected reduction in overall traffic in London, there is forecast to be a slight increase in average speeds and reduction in travel times London-wide. This is primarily from the traffic reduction expected in outer London.
B8	C177	ULEZ expansion will have a positive impact on congestion/will reduce it	645	42	14	We have noted these comments.
B9	C178	ULEZ expansion will cause more congestion/increase it	277	275	2	See response B7.
B10	C179	Concerns that the ULEZ will push congestion and pollution outside of the zone / make surrounding areas worse	680	676	30	We have modelled the impact of the proposed ULEZ expansion to the London Atmospheric Emissions Inventory (LAEI) area. ⁶³ This area comprises Greater London as well as the area within the M25 but outside the Greater London administrative area boundary. Modelling and analysis show there is an expected reduction of pollutants due to

⁶³ The boundary of the LAEI area is defined in Appendix B of the ULEZ Scheme IIA (Appendix C of this report)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>improvement in the fleet associated with reduction in non-compliant vehicles. Overall, based on traffic modelling it is anticipated that there would be negligible changes in traffic flows outside of the proposed expanded ULEZ.</p> <p>Road transport NO_x emissions for all vehicles are expected to reduce by 5.5 per cent (214 tonnes) in the non-Greater London area in 2023 compared to a scenario where there was no ULEZ expansion London-wide. The equivalent figure for road transport PM_{2.5} is a 1.4 per cent (3.5 tonnes) reduction. For PM₁₀, there is a 0.9 per cent (4 tonnes) reduction. For carbon the reduction is 1.6 per cent.</p> <p>Furthermore we have not observed increased pollution on boundary roads following the introduction of the Central London ULEZ in 2019 or its expansion to inner London in 2021, indicating no issue with the displacement of traffic and related emissions.</p>
B11	C180	ULEZ expansion will encourage more	150	65	6	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
		sustainable transport use				

Financial and economic impacts

5.3.3. Table 38 provides a summary of the comments that were received around the financial and economic impacts of the proposals.

Table 38: Responses to comments made about the financial and economic impacts of the proposals

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
B12	C200	Penalises people travelling for/to/from work	3431	3426	65	85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent. Additionally, around

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>half of London households do not own a car.</p> <p>For those whose vehicle does not meet the standard, and where possible, we would encourage everyone to walk, cycle or use public transport to travel to work in line with the MTS aim to increase the number of people using active, efficient and sustainable modes.</p> <p>We work hard to deliver an equitable, accessible and inclusive transport system that works for everyone. Despite facing an unprecedented challenging period, we continue to invest in our network to ensure that more people can travel with ease. We are also continuing to deliver investment in walking and cycling infrastructure in London, including expanding the cycle network and delivering our Healthy Streets programme.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners,</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						charities and micro businesses will be eligible for the scheme. See section 6.1.
B13	C201	Penalises key workers	562	561	35	See response B12.
B14	C202	Penalises tradespeople	618	616	14	See response B12.
B15	C203	Will have detrimental impacts on London / London's economy / businesses	7716	2989	83	Air pollution and traffic congestion both create costs to the economy. 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. ⁶⁴ Last year the cost of traffic congestion in London was estimated at £5.1 billion with the average driver losing 148 hours to congestion per year. ⁶⁵ The proposed scheme will have a positive impact on both air quality and

⁶⁴ <https://www.london.gov.uk/press-releases/mayoral/ulez-to-save-billions-for-nhs>

⁶⁵ <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.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>congestion. See response B1 and response B7.</p> <p>Overall, the ULEZ Scheme IIA found that the proposed scheme would have no material impact on London's economy however there were specific minor negative impacts on some aspects of the economy and businesses, including small and medium sized enterprises in certain sectors of the economy, Heathrow airport and other employers in outer London.</p> <p>The IIA suggested a number of mitigations including a scrappage scheme to help mitigate the impact on individuals and businesses alongside promoting greater use of shared delivery services for last mile deliveries and exploring the potential for park and ride sites for Heathrow airport employees. The IIA also suggested promoting car sharing schemes for people travelling to work and expanding e-bike/ e-scooter hire at outer London stations, as well as further promotion of public transport</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>access to major retail centres in outer London.</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p>
B16	C204	Will have a detrimental impact on my business/livelihood	801	801	16	<p>The ULEZ Scheme IIA identified minor negative impacts on the growth and creation of businesses in outer London. This included contraction of the potential local labour market and the increased cost of operating LGVs, alongside local labour market constraints at Heathrow.</p> <p>The IIA identified a number of mitigations including a scrappage scheme, promotion of car share schemes, expansion of cycle hire and</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>greater use of shared delivery services for last mile deliveries.</p> <p>We have developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p> <p>We also continue to work across TfL and with partners to identify opportunities for improving deliveries and servicing.</p>
B17	C205	Will have detrimental impacts on small businesses	1367	1367	50	<p>The ULEZ Scheme IIA identified some minor negative impacts which applied to both small and medium sized businesses. These included the contraction of the potential local labour market due to fewer commuters entering Greater London and people in the proposed expansion area switching jobs to more accessible locations; and increased cost of operating LGVs.</p> <p>The IIA identified a number of mitigations including a scrappage scheme, promotion of car share schemes, expansion of cycle hire and</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>greater use of shared delivery services for last mile deliveries.</p> <p>We have developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p> <p>We also continue to work across TfL to identify opportunities for improving deliveries and servicing.</p>
B18	C206	Will force people out of employment / to change employment	1707	1705	21	<p>The ULEZ Scheme IIA identified that the ULEZ expansion London-wide could have a minor negative impact on employers in outer London due to a small potential loss of individuals from outside Greater London who are willing to work in outer London.</p> <p>Alongside a potentially greater turnover of employees who are resident in outer London, the expansion may lead people to switch transport modes or change jobs to one that they can access more readily by an alternative mode of transport. In outer London, this may</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>particularly be the case where borough-to-borough commuting is predominantly by car.</p> <p>Businesses that operate outside standard working hours and in locations less accessible by public transport are likely to be the most impacted.</p> <p>For those eligible, the Mayor has committed to help through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. See section 6.1.</p>
B19	C207	ULEZ costs will be/are being passed onto residents/customers from businesses/services	622	620	13	<p>The ULEZ Scheme IIA did not identify this issue as an impact. However, the IIA did suggest that costs to customers may increase due to a reduction in competition if some businesses and tradespeople from outside Greater London choose to no longer serve the London market. 85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent. In many cases, it is expected that should businesses using non-compliant vehicles choose to pass the charge on to customers, this would be spread across multiple customers in one day and so would only result in a marginal cost increase per customer.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p> <p>We also continue to work across TfL to identify opportunities for improving deliveries and servicing.</p>
B20	C208	Will increase the cost of living (general comments)	7736	3007	42	Expanding the ULEZ London-wide will strike the best balance between maximising the health and environmental benefits for Londoners while minimising the cost to drivers. 85 per cent of vehicles seen in outer

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p>This is also a matter of social justice. Air pollution hits the poorest communities and Black, Asian and minority ethnic Londoners the hardest. Nearly half of London households do not own a car, but are disproportionately feeling the damaging consequences that polluting vehicles cause.</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.
B21	C209	Cannot afford daily charge / to upgrade to a compliant vehicle / compliant vehicles are expensive / concerns about current vehicles being devalued	13192	13189	108	<p>All petrol vehicles sold new from 2005 are compliant with the ULEZ standards. If the ULEZ is expanded London-wide in August 2023, compliant petrol vehicles for those that need to drive and own their own vehicle, will have been available for 18 years. Given the age of the vehicles and size of the market, compliant vehicles are available at a relatively low cost.</p> <p>We have developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p>
B22	C210	Funding / financial support should be provided to support the upgrading / replacing of	1739	1736	50	See response B21.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
		vehicles to be compliant				
B23	C211	Businesses will relocate outside of London to avoid paying the charge	267	267	6	<p>85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p>It is considered unlikely that businesses will relocate outside Greater London to avoid paying the charge for using a non-compliant vehicle.</p> <p>This is not an issue that has been observed with either the central London ULEZ or the expansion to inner London.</p>
B24	C212	Residents will relocate outside of London to avoid paying the charge	1286	1286	6	<p>85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p>It is considered unlikely that residents will relocate outside Greater London to avoid paying the charge for using a non-compliant vehicle. This was not something that the ULEZ Scheme IIA identified as an impact.</p> <p>All petrol vehicles sold new from 2005 are compliant with the ULEZ standards. If the ULEZ is expanded London-wide in August 2023, compliant petrol vehicles for those that need to drive and own their own vehicle, will have been available for 18 years. Given the age of the vehicles and size of the market, compliant vehicles are available at a relatively low cost. There are also public transport, walking and cycling options as a low or no cost alternative to purchasing a compliant vehicle.</p>
B25	C213	Other comments about financial impacts	235	234	9	<u>Our response to 'Compliant second-hand vehicles are expensive / not readily available'</u>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
		<p>We received 235 other comments about the financial impacts of the ULEZ which we have noted.</p> <p>Comments included:</p> <ul style="list-style-type: none"> - Compliant second-hand vehicles are expensive / not readily available - Proposals penalise those on middle-income who will not receive support - Proposals penalise those with caring responsibilities 				<p>Compliant petrol cars have been widely available since 2005 and diesel cars have been available since 2016. Furthermore, only a small percentage of vehicles will need to upgrade: 85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p><u>Our response to 'Proposals penalise those on middle-income who will not receive support'</u></p> <p>See response above.</p> <p><u>Our response to 'Proposals penalise those with caring responsibilities'</u></p> <p>For those eligible, the Mayor has committed to help through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. This could help to mitigate</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						<p>impacts on access to employment. See section 6.1.</p> <p>It is proposed to extend the grace period 100 per cent discount for not-for-profit community transport by two years to October 2025. This applies to eligible organisations (including state schools) including those outside Greater London.</p> <p>It is also proposed to extend the grace period exemptions for disabled tax class vehicles by two years to October 2027.</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p>

Social impacts

5.3.4. Table 39 provides a summary of the comments that were received around the social impacts of the proposals.

Table 39: Responses to comments made about the social impacts of the proposals

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
B26	C230	Having and using a car is a necessity because of needs / cannot use other transport modes (e.g. public transport or active travel)	6131	6129	92	<p>We are committed to ensuring that our transport network is safe, affordable and accessible. Improving the accessibility of London's extensive public transport services is a key component of the Mayor's Transport Strategy and we work hard to deliver an equitable, accessible and inclusive system that works for everyone.</p> <p>We are also working to deliver our Walking and Cycling action plans, which include infrastructure and non-infrastructure measures to make walking and cycling more accessible and inclusive.</p> <p>For individuals who are unable to use public transport, walk or cycle, we are proposing to extend the current grace period exemptions for vehicles with 'disabled' or 'disabled passenger' tax</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>class until October 2027. We are also proposing to extend the grace period exemption for wheelchair accessible TfL licenced PHVs fulfilling a private hire booking until October 2027. Both of these proposals reflect the need for groups impacted to have additional time to prepare for the proposed expansion.</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p>
B27	C231	Public Transport provisions are poor / not a viable alternative / safety concerns with using	6825	6818	98	<p>We are investing in public transport and delivering improvements across the network.</p> <p>On the Tube network, we opened the Northern Line extension to Battersea</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		public transport (e.g. using at night)				<p>Power Station in September 2021, the first phase of the Bank Station upgrade in May 2022, and added eight step-free stations to the network in 2021/22.</p> <p>On our rail networks, we opened the Elizabeth Line in May 2022, and an extension of the London Overground to Barking Riverside in July 2022. We have also agreed with Government to add up to 11 more trains to the new DLR fleet of 43 trains currently under construction.</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 our fleet.</p> <p>We continue to work in close partnership with the Metropolitan Police Service (MPS) and British Transport Police (BTP) to ensure our public transport network feels and remains</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						safe, for both our customers and employees. We have a number of initiatives, working with the police, to improve safety on the network. This includes a new poster campaign on our network highlighting our zero-tolerance approach to hate crime and abuse. Through our schools outreach programme, we are providing additional support to secondary schools to educate pupils about the impact of hate crime. We have also launched a programme of activity to improve the safety of women and girls, including infrastructure measures, policy, communications, training and legislation.
B28	C232	Does not consider the current cost of living crisis / financial crunch / bad timing / impacts from Covid-19	10173	10171	120	The ULEZ Scheme IIA baseline highlights that the cost of living has been increasing across the UK since early 2021 and in March 2022, inflation reached its highest recorded level since 1992. This affects the affordability of goods and services for households. To help support Londoners, the Mayor has funded a 24-hour debt helpline to provide assistance to people struggling

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>with the cost of living crisis, is providing a Cost of Living Hub⁶⁶ which contains information about benefits, grants and discounts people can access if they are in financial difficulty, from the Mayor of London, the government, their local council, charities and advice centres, and is providing the Warmer Homes programme⁶⁷ which provides free heating, insulation and ventilation improvements for low income Londoners who own their own homes or rent privately.</p> <p>The Mayor considered four potential options to tackle the triple challenges facing London. The ULEZ expansion London-wide struck the right balance between maximising the health and environmental benefits for Londoners, while minimising the impacts on drivers. Modifications to the scheme have been included in the proposals for consultation, including extending the deadline of the existing grace periods.</p>

⁶⁶ <https://www.london.gov.uk/what-we-do/communities/help-cost-living>

⁶⁷ <https://www.london.gov.uk/what-we-do/housing-and-land/improving-quality/warmer-homes>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>In London 1 in 3 families with a disabled adult are living in poverty, compared to 1 in 4 families without a disabled adult. Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p>
B29	C233	Will have detrimental impacts on people's lives	9023	4295	77	The ULEZ Scheme IIA identified both positive and negative impacts as a result of the proposed expansion of the ULEZ London-wide. These are summarised in Section 2.4 of this report and the IIA will be presented to the Mayor as part of the decision documents. The Mayor is required to consider the impacts as shown in the IIA

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						when making a decision on whether or not to proceed with the proposals.
B30	C234	Will push people into / towards poverty	2309	2309	9	<p>85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p>We understand that for those with non-compliant vehicles, the proposed ULEZ expansion London-wide may have a financial impact on some individuals. The ULEZ Scheme IIA identified that there may be a disproportionate moderate negative financial impact for people on low incomes travelling by non-compliant private vehicle in outer London to access employment (particularly in the night-time economy) or other opportunities, due to their lesser capacity to switch to a compliant vehicle.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>We work hard to deliver an equitable, accessible and inclusive transport system that works for everyone, as an alternative to private car use. Despite facing an unprecedented challenging period, we continue to invest in our network to ensure that more people can travel with ease. We are also continuing to deliver investment in walking and cycling infrastructure in London, including expanding the cycle network and delivering our Healthy Streets programme.</p> <p>For those who are required to pay the charge as their vehicle is not compliant and for whom public transport, walking or cycling is not an option, the Mayor has committed to a large-scale and targeted scrappage scheme to help those who meet the eligibility criteria to upgrade their vehicle. See section 6.1.</p>
B31	C235	Will negatively impact those living outside of Greater London	1868	1868	52	The ULEZ Scheme IIA identified community severance impacts (assessed as minor negative) for people living in communities adjacent to the proposed London-wide ULEZ boundary,

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>who are required to travel into outer London by non-compliant car to access employment, services and facilities. The IIA notes that there is likely to be a disproportionate impact on people with low incomes.</p> <p>The IIA suggested this impact could be mitigated by collaborative working between TfL and local authorities adjacent to the GLA, for example, through holding regular meetings up to the implementation of the Proposed Scheme and for the first year of implementation to monitor the impacts of the proposed expansion.</p> <p>We have already met with some Local Authorities adjacent to the GLA to discuss the proposed expansion and will continue to work with them to help minimise the impact and encourage sustainable transport choices where possible for those living outside of the zone should the expansion be approved by the Mayor.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
B32	C236	Will have negative impacts on mental health	1006	1005	11	<p>The ULEZ Scheme IIA identified that the additional cost of the proposed ULEZ expansion London-wide for people already struggling financially (either from paying the charge as they drive a non-compliant vehicle or upgrading to a compliant vehicle) could have a detrimental impact on their mental health through creating stress and anxiety. It further highlights that there is a growing body of evidence of a link between lower socio-economic status and poor mental health.</p> <p>The IIA suggests overall there is likely to be a short to medium term moderate negative impact on health (stress, anxiety and isolation) for people on low incomes, older people and disabled people (who do not qualify for the disabled vehicle tax class exemption) travelling by non-compliant vehicle and unable to easily switch mode.</p> <p>For those eligible, the Mayor has committed to help through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>approved. This will help to support Londoners on low incomes and disabled Londoners, as well as micro businesses and charities with the cost of upgrading their vehicle or choosing a sustainable alternative. See section 6.1.</p> <p>The Mayor has also funded a 24-hour debt helpline to provide assistance to people struggling with the cost-of-living crisis. The Cost of Living Hub⁶⁸ includes information on mental health support.</p>
B33	C237	Will negatively impact on social / leisure activities / visiting friends and family / concerns about social isolation	4149	4146	58	<p>The ULEZ Scheme IIA identified that there is likely to be a short to medium term moderate negative impact on isolation for people on low incomes, older people and disabled people who do not qualify for the disabled vehicle tax class exemption and rely on the use of their own (or nominated driver's) non-compliant vehicle.</p> <p>The IIA highlighted that this may result in disproportionately poorer socio-economic and wellbeing outcomes for these groups. To mitigate the impact,</p>

⁶⁸ <https://www.london.gov.uk/what-we-do/communities/help-cost-living>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>the IIA suggested facilitating discussions with stakeholders to support choices around options available and provide guidance to assist people in determining the course of action which makes the most financial sense for their circumstances. We continue to have regular discussions with stakeholders to understand how we can provide support and guidance.</p> <p>The IIA also suggested a scrappage scheme as a mitigation that is targeted to low-income Londoners and people on non-means tested disability benefits, with targeted assistance provided for applications (informed by engagement with disabled groups).</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						expansion London-wide. This would support Londoners on low incomes and disabled Londoners, as well as micro businesses and charities. See section 6.1.
B34	C238	<p>Other comments about social impacts</p> <p>We received 134 other comments about the social impacts of the ULEZ which we have noted.</p> <p>Comments included:</p> <ul style="list-style-type: none"> - Concerns about the impact on older people, vulnerable groups and those on low incomes - Concern about the impact on people living near the 	130	130	10	<p><u>Our response to ‘Concerns about the impact on older people, vulnerable groups and those on low incomes’</u></p> <p>The ULEZ Scheme IIA identified:</p> <ul style="list-style-type: none"> - minor negative impact on vulnerable groups (e.g. refugees/asylum seekers, women, homeless people, and disabled people) who rely on services provided by charities and community organisations using non-compliant vans and minibuses within outer London. - moderate negative impact on people on low incomes who travel by non-compliant vehicle in outer London to access employment (particularly in the night-time economy) and other opportunities. - minor negative impact on some older people, disabled people, people with underlying health conditions and

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>boundary who may need to make short journeys / low-income groups living outside Greater London who are employed in outer London</p> <ul style="list-style-type: none"> - Concern about the negative impact on schools struggling to find staff who cannot afford to live in London - Concern about the impact on access to hospitals 				<p>people on low incomes who travel by non-compliant private vehicles to access regular medical appointments at specialist facilities in outer London or outside London.</p> <p>To mitigate the impact, the IIA suggested facilitating discussions with stakeholders to support choices around options available and provide guidance to assist people in determining the course of action which makes the most financial sense for their circumstances. We continue to have regular discussions with stakeholders to understand how we can provide support and guidance.</p> <p>The IIA also suggested a scrappage scheme as a mitigation that is targeted to low-income Londoners and people on non-means tested disability benefits, with assistance provided for applications.</p> <p>It is proposed to extend the grace period 100 per cent discount for not-for-profit community transport by two years to October 2025. This applies to eligible</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>organisations (including state schools) including those outside Greater London. It is also proposed to extend the grace period exemption for disabled tax class vehicles by two years to October 2027.</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p> <p><u>Our response to ‘Concern about the impact on people living near the boundary who may need to make short journeys / low-income groups living outside Greater London who are employed in outer London’</u></p> <p>See response B31.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p><u>Our response to 'Concern about the negative impact on schools struggling to find staff who cannot afford to live in London'</u></p> <p>See response to <u>'Concerns about the impact on older people, vulnerable groups and those on low incomes'</u> above.</p> <p><u>Our response to 'Concern about the impact on access to hospitals'</u></p> <p>See response to <u>'Concerns about the impact on older people, vulnerable groups and those on low incomes'</u> above.</p>

Other stakeholder comments

5.3.5. We have noted these additional comments from stakeholders that are not included in the tables above.

5.3.6. Concerns were raised around the impact specifically on the M25 motorway, which could be used as an alternative route outside the proposed ULEZ. Boleyn Recovery Fleet Services stated this could result in vehicles driving further to avoid the charge. The London region committee of the Chartered Institute of Logistics and Transport noted the lack of diversionary routes if the M25 is closed, which could result in vehicles entering the ULEZ and having to pay the charge as a result. **Our response:** *The proposed boundary for the London-wide ULEZ is the same as the current LEZ boundary for heavy vehicles. The LEZ boundary has proven to be an effective boundary for the LEZ scheme and provides drivers with appropriate routes to avoid entering the zone if they do not comply with required emission standards. There is also existing signage for the*

LEZ boundary which could be adapted if the proposed London-wide ULEZ is confirmed. If a non-compliant vehicle receives a PCN after entering the ULEZ as a result of a diversion, they may note this in their appeal representation. These are assessed on a case-by-case basis. If a driver explains they were diverted into the charging zone, we will cancel the PCN upon the receipt of clear evidence being provided.

- 5.3.7. Freedom for Drivers questioned the impact of the proposed scheme on air quality and believed the impact of the existing ULEZ has been exaggerated. Save Our Rights UK considered that there is no climate emergency and that motorists are not a primary source of pollution. **Our response:** *This is not supported by data published at the time of the consultation. In London, road transport accounts for 44 per cent of NO_x emissions, 31 per cent of PM_{2.5} emissions and 28 per cent of carbon emissions⁶⁹. The proposed London-wide ULEZ is expected to reduce road transport NO_x emissions by 5.4 per cent (362 tonnes) in London. There is expected to be a 1.5 per cent (7.8 tonnes) reduction in PM_{2.5} emissions from road transport in London.*
- 5.3.8. Concerns around the recent increases in the cost of compliant second-hand vehicles were raised in the responses received from:
- John Cruddas MP
 - Gareth Bacon MP
 - Royal Borough of Kingston upon Thames
 - London Borough of Richmond upon Thames
 - The RAC
 - Hartley & District Residents' Association
 - West Wickham Residents Association
- 5.3.9. **Our response:** *85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent. Nearly all petrol vehicles sold from 2005 are compliant with the ULEZ standards. If the ULEZ is expanded London-wide in August 2023, compliant petrol vehicles for those that need to drive and own their own vehicle, will have been available for 18 years. Given the age of the vehicles and size of the market, compliant vehicles are available at relatively low cost. For many journeys, there are also public transport and active travel options as a low or no cost*

⁶⁹ LAEI, 2019

alternative to purchasing a compliant vehicle. Car clubs can also play a role in assisting Londoners who want to move away from private car ownership.

5.3.10. The following stakeholders raised concerns around the impact on the voluntary sector and their services.

- Gravesham Borough Council
- WWT London Wetland Centre
- Pepys Community Forum
- SERV Herts and Beds Bloodbikes
- XL
- Lewisham YBC
- Havering Volunteer Centre
- Watford Recycling Arts Project
- The Felix Project

Our response: *To support charities, non-compliant community transport minibuses operated by not-for-profit organisations are eligible for a grace period 100 per cent discount from the ULEZ daily charge. It is proposed to extend the grace period for not-for-profit community transport minibuses by two years to October 2025. This will also apply to eligible not-for-profit organisations outside Greater London. We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.*

5.3.11. Councillor George Pender (Sevenoaks DC) suggested that the impact of the scheme would be eroded over time as people became more accustomed to paying it. ***Our response:*** *We will continue to monitor the effectiveness of the scheme if it is implemented. Any future changes to the scheme would be subject to further consultation.*

5.3.12. LB Camden, LB Harrow and LB Havering expressed concern about the lack of vehicle ownership / non-compliance data in outer London which makes assessing the impacts more challenging. ***Our response:*** *Information on car ownership and levels of compliance in London, including outer London, is available in the London-wide ULEZ and MTS revision baseline report for the ULEZ Scheme IIA and MTS IIA (Appendix J of this report). The IIA used the latest available car ownership data from SMMT at the time (2020 data) and for consistency used 2020 DfT data.*

- 5.3.13. LB Hounslow noted the unique circumstances of Heathrow Airport, where an employee's ability to use public transport is often limited due to geographical area or non-standard work hours. **Our response:** *The IIA identified a moderate negative impact on those reliant on non-compliant vehicles including people on low incomes accessing employment (particularly in the night-time economy) or opportunities in outer London, alongside local labour market constraints at Heathrow Airport. The IIA suggested a number of mitigations including a scrappage scheme to help mitigate the impact on individuals alongside promoting car sharing schemes for people travelling to work and exploring the potential for park and ride sites for Heathrow airport employees. Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1. We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1. No further mitigation measures are currently proposed, however TfL will actively monitor and explore whether further appropriate mitigation measures could be implemented at a later date.*
- 5.3.14. LB Southwark highlighted the reference to the potential increase in tyre wear and abrasion of road surface over time especially where electric vehicles may be heavier compared to petrol or diesel counterparts in the consultation document, suggesting that further work by TfL would be beneficial on this subject. **Our response:** *We have noted this comment.*
- 5.3.15. Several local authorities outside of London expressed concern about the congestion and air quality impacts of traffic diverting to roads / parking in their areas to avoid the charge (in some cases requesting further traffic and/or air quality modelling), and the impact of the charge on access to services within the zone.
- Kent CC noted that there has been no analysis on compliant vehicles in neighbouring boroughs and therefore raised a concern about the number of non-compliant vehicles travelling from Kent.
 - Epping Forest District Council were concerned about the impact of the proposals on the Epping Forest Special Area of Conservation. Further details on a Habitat Regulation Assessment Screening are provided in section 5.24.
 - Hertfordshire CC requested further modelling on the impact on Air Quality Management Areas in the south of the county, particularly the A10 corridor in Broxbourne.
 - Spelthorne BC were concerned there was no presentation of the localised impacts on Spelthorne and therefore find it difficult to fully understand the impact on residents, businesses and air quality. They suggested TfL should commission a detailed Social and Distributional Analysis for Spelthorne, to include local air quality impacts.
 - Kent CC, Essex CC and Greater North Kent requested that we share more data.

- Slough BC expressed concern about the mitigation proposed in the IIA of providing park and ride sites in Slough for people travelling to the airport in terms of its impact on the local Green Belt. They would like further analysis on the impacts of the scheme on Slough, including an independent environmental assessment. Elmbridge BC highlighted the potential impact on parking in the borough if people sought to avoid entering the zone.

Our response: 85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent. We have modelled the impact of the proposed ULEZ expansion to the LAEI area⁷⁰. This area comprises Greater London as well as the area within the M25 but outside of the Greater London boundary. Modelling and analysis show there is an expected reduction of pollutants in this area. Whilst we have not modelled beyond the LAEI area, we would expect any changes in traffic or demand for parking to be minor. We welcome further engagement with non-GLA local authorities, including regarding any potential mitigation measures identified in the IIA, and can provide further information for any areas within the LAEI area.

- 5.3.16. The Environment Agency noted that the IIA 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 and that it also acknowledges that this could also result in an increase in fly tipping or illegal waste operations and activities. Both of these potential impacts, if they were to be realised, have potential to impact on the Mayor's 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). ***Our response:*** The IIA stated that the estimated volume of waste material should be viewed as a maximum figure (or worst-case scenario) and that this tonnage could be recycled or recovered by existing end-of-life vehicles (ELV) treatment facilities within the M25. 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. The IIA also concluded that given the high proportion of ULEZ compliant vehicles, and the number of owners of non-compliant vehicles who would willingly break the law by fly tipping, the likely impact was considered to be negligible in the wider outer London context.

⁷⁰ The boundary of the LAEI area is defined in Appendix B of the ULEZ Scheme IIA (Appendix C of this report)

- 5.3.17. Chessington World of Adventures expressed concern on the impact on tourism and suggested the proposals could have an adverse impact on the sector. **Our response:** 85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent. The IIA did not identify a likely impact on tourism as a result of the proposals.
- 5.3.18. Disabled Motoring UK explained that disabled people do not have as much choice with vehicles, especially those who need Wheelchair Accessible Vehicles, which tend to be larger and run on diesel. **Our response:** It is proposed to extend the grace period exemptions for disabled and disabled passenger tax class and TfL licenced PHV WAVs to October 2027. Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.
- 5.3.19. Harrow Community Transport and Hillingdon Community Transport expressed concern that proposals would be detrimental to community transport projects without compliant vehicles. **Our response:** It is proposed to extend the grace period 100 per cent discount for not-for-profit community transport by two years to October 2025. This will also apply to eligible not-for-profit organisations outside Greater London.
- 5.3.20. Bexley Citizens Advice suggested that the Mayor of London's claims that ULEZ has made a difference is not supported by evidence and quoted an Imperial College study and the Integrated Impact Assessment for the proposed ULEZ scheme explaining that these reports suggest ULEZ has made minor improvements to air quality in London. **Our response:** The expansion of ULEZ to inner London has had a significant impact on the number of older, more polluting vehicles seen driving in London and the levels of harmful pollution Londoners are exposed to. ULEZ has a proven track record of reducing pollutants. Six months after the expansion into inner London, harmful NO₂ concentrations alongside roads in inner London were estimated to be 20 per cent lower than they would have been without the ULEZ and its expansion.⁷¹ The proposed London-wide ULEZ is expected to reduce annual road transport NO_x emissions by 5.4 per cent (362 tonnes) in London. There is expected to be a 1.5 per cent (7.8 tonnes) reduction in annual PM_{2.5} emissions from road transport in London. It is important to strike a balance between air quality improvements (achieved through vehicle emissions standards) and the impact on individuals and businesses in terms of the costs of meeting these standards. After considering the options put forward to help reduce emissions from road transport, the Mayor asked us to consult on

⁷¹ Expanded Ultra Low Emission Zone – Six Month Report including Low Emission Zone – One Year Report (2022)
https://www.london.gov.uk/sites/default/files/expanded_ultra_low_emission_zone_six_month_report.pdf

expanding the current ULEZ London-wide in 2023 because this would strike the right balance between maximising the health and environmental benefits for Londoners while minimising the impacts on drivers.

5.3.21. The Alliance of British Drivers criticised the finding of the IIA, stating that it shows that there is little improvement to air pollution, congestion or climate change and that it is clear that the report concludes that the net effect of the proposals is overwhelmingly negative or neutral. **Our response:** *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. Without further action to reduce air pollution, it is estimated that around 550,000 Londoners will develop diseases related to poor air quality by 2050, 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. 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_x emissions in outer London from cars by 9.6 per cent (239 tonnes) and 6.6 per cent (84 tonnes) for vans. This results in an average reduction in NO₂ concentrations in outer London of 1.5 per cent, one per cent in inner London and 0.7 per cent in central London. This means that nearly 25,000 additional Londoners would live in areas meeting the World Health Organization interim target for NO₂ concentrations of 30 µg/m³ and 335,000 additional Londoners would give in areas meeting the tighter interim target of 20 µg/m³.*

5.4. Discounts and exemptions

5.4.1. Table 40 provides a summary of the comments that were received around discounts and exemptions for the proposed ULEZ expansion London-wide.

Table 40: Responses to comments made about discounts and exemptions

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
C1	C250	Support discounts / exemptions	5216	200	22	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
C2	C251	Oppose discounts / exemptions	160	159	1	Discounts and exemptions are offered to those who have little or no alternative means of transport, or where a specific, specialised vehicle has to be used. All our road user charging schemes offer discounts and exemptions. The number of discounts and exemptions for the ULEZ is low as they have a direct impact on the effectiveness of the scheme.
C3	C252	Suggest period for temporary discounts / exemptions should be extended / made permanent	49	49	9	As part of the consultation, we are proposing to extend the temporary period (sometimes known as a 'grace period') during which non-compliant vehicles are not charged by two years for vehicles with 'disabled' and 'disabled passenger' tax class, minibuses operated by not-for-profit organisations and wheelchair accessible TfL licenced private hire vehicles. This will also include an extension of the grace period in the existing ULEZ area. See Table 8 on page 46 of the consultation supporting document (Appendix A of this report) for further details. The proposed extension balances the need for these groups to have additional time to prepare for the newly charged area with

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>the availability and cost of alternative compliant vehicles.</p> <p>In response to the consultation and engagement with stakeholders, we have also proposed two new time-limited grace period 100 per cent discounts ('Disabled benefits grace period' and 'Wheelchair Accessible Vehicles grace period'). See Section 6.1.</p>
C4	C253	Suggest period for temporary discounts / exemptions should be reduced	6	5	0	See response C3.
C5	C255	People who live in the ULEZ should not have to pay the charge / should be exempt	819	818	6	<p>Exempting those who live within the zone and drive non-compliant vehicles from paying the ULEZ charge would considerably diminish the benefits of the scheme.</p> <p>The existing ULEZ scheme has had a significant impact on vehicle compliance in the zone, meaning a bigger share of vehicles in London meet or exceed ULEZ standards. Six months after the launch of the ULEZ in inner London nearly 94 per cent of vehicles seen driving in the zone meet ULEZ standards on an average day.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>This has increased from 39 per cent in 2017. As a result, there are fewer older, more polluting vehicles in the zone.</p> <p>85 per cent of vehicles seen in outer London meet ULEZ standards on an average day meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p>
C6	C256	NHS / key workers should receive discounts / exemptions	303	303	16	<p>The primary objective of the ULEZ is to reduce emissions and improve air quality. The number of discounts and exemptions available to the scheme has been limited in order not to undermine the objective of the scheme.</p> <p>There is no proposal to offer an NHS or key worker discount or exemption to the ULEZ, and this was not offered under Central London ULEZ or when ULEZ was extended to inner London. This could potentially include a large number of people and, therefore, risk undermining the benefits of the scheme.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>While toxic air pollutants have been reducing across London, the rate of reduction has been significantly slower in outer London⁷². Not only is this harming the quality and duration of individual lives, it also has wider costs - a 2020 study estimated that if no action is taken to reduce current levels of pollution the cumulative cost of air pollution to the NHS and social care system in London is estimated to be up to £15.4 billion.⁷³</p> <p>In line with the Mayor's aim for 80 per cent of all trips to be made by walking, cycling or public transport by 2041, we would encourage everyone to use sustainable modes where possible. We work hard to deliver an equitable, accessible and inclusive system that works for everyone.</p> <p>The Mayor has committed to help those who need it most through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. This</p>

⁷² <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

⁷³ <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/modelling-long-term-health-impacts-air-pollution-london>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						would include those on Universal Credit. See section 6.1.
C7	C258	NHS patients should receive discounts / reimbursements / exemptions	94	94	16	<p>Some NHS patients are eligible for a reimbursement of the daily ULEZ charge for journeys to and from hospital and it is proposed that this would continue.</p> <p>The reimbursement is available for NHS patients who are clinically assessed as too ill, weak or disabled to travel to an appointment on public transport and have a compromised immune system; require regular therapy or assessments; or need regular surgical intervention.</p>
C8	C260	Oppose taxis / black cabs not being charged / should not be exempt	154	153	7	<p>London-registered taxis are not included in the ULEZ scheme as separate measures have been taken to reduce emissions from taxis. These include the requirement that since 1 January 2018, all newly licensed taxis must be zero emissions capable.</p> <p>There are also maximum age limits for all licensed taxis, the maximum age limit reduced to 12 years on 1 November 2022 and from this date Euro 3, 4 and 5 diesel taxis that are older than 11 years will not be relicensed.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						Taxis registered outside London will not be exempt from the ULEZ scheme. We are proposing to extend the grace period exemption for wheelchair accessible TfL licenced private hire vehicles until October 2027 to help mitigate the impact on individuals who rely on their services and provide time for vehicle owners to upgrade their vehicles.
C9	C261	Support taxis / black cabs not being charged / should be exempt	20	20	2	We have noted these comments.
C10	C262	Oppose Private Hire Vehicles (PHVs) being charged / should be exempt	26	26	0	<p>The ULEZ is based on vehicle type, PHVs are included in the scheme and are required to meet the same standards as other cars. Exempting a potentially large number of vehicles could risk undermining the benefits of the scheme.</p> <p>The IIA baseline report (Appendix J of this report) states London PHVs are currently 97 per cent compliant with ULEZ. We are also proposing to extend the grace period exemption for wheelchair accessible TfL licenced PHVs until October 2027 to help mitigate the impact on individuals who rely</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						on their services and provide time for vehicle owners to upgrade their vehicles.
C11	C263	Support Private Hire Vehicles (PHVs) being charged / should not be exempt	27	27	0	We have noted these comments.
C12	C264	Should be discounts / exemptions for emergency service workers	73	73	2	See response C6.
C13	C265	Should be discounts / exemptions for tradespeople / delivery vehicles / small / local businesses / sole traders	129	129	6	<p>The primary objective of the ULEZ is to reduce emissions and improve air quality. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme.</p> <p>There is no proposal to offer a discount or exemption for tradespeople, delivery vehicles or small businesses to the ULEZ. 85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p>For those that need to drive in the zone and are unable to upgrade, the Mayor has committed to help those who need it most, including micro businesses, through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. See section 6.1.</p> <p>We are also working with businesses and the freight industry to identify suitable sustainable alternatives including encouraging the take up of efficient ways of moving and managing freight.</p> <p>This includes initiatives such as the development of the Rail Freight Strategy and working with Network Rail to help move freight from road to rail. We are also rolling out 'click and collect' lockers on our premises to help consolidate deliveries and are working with industry to promote sustainable last mile delivery alternatives including cargo bikes.</p> <p>Our Electric Vehicle Infrastructure Strategy commits to support key user groups</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						including lights goods vehicles by establishing a commercial fleet database and setting up the London Electric Vehicle Business Leader's Forum. Both of these measures work with commercial fleet users to help them switch towards Electric Vehicles.
C14	C268	Should be discounts / exemptions for charities	52	52	16	To support charities, non-compliant community transport minibuses operated by not-for-profit organisations are eligible for a grace period from the ULEZ daily charge. It is proposed to extend the grace period for not-for-profit community transport minibuses by two years to October 2025. This will also apply to eligible not-for-profit organisations outside Greater London.
C15	C269	Should be discounts / exemptions for businesses (general comments)	29	29	3	The primary objective of the ULEZ is to reduce emissions and improve air quality to improve health. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme. There is no proposal to offer a discount or exemption for businesses. This could potentially include a large number of

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						vehicles and therefore risk undermining the benefits of the scheme. The Mayor has committed to help those who need it most, including micro businesses through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. See section 6.1.
C16	C270	Should be discounts / exemptions for disabled people (those without disabled class vehicles)	5037	309	17	As a result of stakeholder feedback around the anticipated impacts on disabled Londoners, we have proposed two further mitigation measures: <ul style="list-style-type: none"> - a new grace period for recipients of the standard rate of the mobility component of Personal Independence Payment (PIP)⁷⁴ and other specific state benefits; and - a new grace period for all wheelchair accessible vehicles, including private vehicles. Full detail on the further mitigation proposals can be found in section 6.1.

⁷⁴ Adult Disability Payment (ADP) standard rate mobility component recipients (Scotland only) would also be eligible.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
C17	C271	Should be discounts / exemptions for elderly / vulnerable people	220	220	4	<p>The primary objective of the ULEZ is to reduce emissions and improve air quality. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme.</p> <p>Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p>
C18	C273	Should be discounts / exemptions for those with informal family care arrangements	83	83	3	<p>The primary objective of the ULEZ is to reduce emissions and improve air quality to improve health. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme.</p> <p>There is no proposal to offer a discount or exemption for informal carers to the ULEZ.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent.</p> <p>The Mayor has committed to help those who need it most, including Londoners on low incomes and disabled Londoners through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. See section 6.1.</p>
C19	C274	Should be discounts / exemptions for those on low incomes / financially struggling / charging should take household income into account (e.g. means testing)	201	201	10	<p>The primary objective of the ULEZ is to reduce emissions and improve air quality to improve health. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme.</p> <p>The ULEZ Scheme IIA suggested a scrappage scheme as a mitigation that is targeted to Londoners on low incomes and people on non-means tested disability benefits, with assistance provided for</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						applications where needed (informed by engagement with disabled groups). The Mayor has committed to a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved for those who need it most, including Londoners on low incomes. See section 6.1.
C20	C275	Should be discounts / exemptions for vehicle-sharing / car-sharing	22	22	3	<p>The overarching objective of the MTS is that 80 per cent of all journeys in London should be made by walking, cycling or using public transport by 2041.</p> <p>There is a role for car clubs to support a reduction in car ownership and use and encouraging a step change to greater use of active and sustainable modes. All of London's car club vehicles are already ULEZ compliant and do not incur a ULEZ charge.</p> <p>Scrappage payments are received at a point where a vehicle has been given up and decisions need to be made about whether to purchase a new one. We will work with transport sectors such as car clubs in providing third party discounts and</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>promotions to support a switch away from privately owned vehicles. Promoting car club offers at this point could enable drivers to switch to car club membership rather than purchasing a replacement vehicle.</p> <p>Car users who informally share for individual trips are able to spread the additional cost between them.</p>
C21	C278	Should be discounts / exemptions for classic / historical vehicles	481	480	8	<p>All vehicles with historic tax class are exempt from the ULEZ. This tax class applies if a vehicle was built more than 40 years ago, with the date moving forward on a 40-year rolling system.</p> <p>This tax class excludes vehicles that are used commercially. In line with the existing LEZ scheme, all vehicles constructed before 1 January 1973 are exempt from the ULEZ, regardless of commercial use or otherwise.</p>
C22	C279	Should be discounts / exemptions for motorcycles	89	89	3	<p>The primary objective of the ULEZ is to reduce emissions and improve air quality to improve health. The number of discounts and exemptions available to the</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>scheme has been limited, in order not to undermine the objective of the scheme.</p> <p>Exhaust emissions regulation for motorcycles began later than for passenger cars and have since lagged behind the trajectory of emissions controls used for other vehicles. This means that, although motorcycles may contribute a relatively small proportion of total emissions, they can be highly polluting on an individual basis.</p> <p>The ULEZ requires the Euro 3 standard for motorcycles, which is lower than the standards for other vehicle types. Euro 3 became mandatory for all new motorcycles in 2007 meaning the vast majority of motorcycle users will not need to pay the charge.</p> <p>The Mayor has committed to help those who need it most through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. See section 6.1.</p>
C23	C280	Should be discounts / exemptions for	53	53	2	The primary objective of the ULEZ is to reduce emissions and improve air quality to improve health. The number of

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		caravans / campervans				discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme.
C24	C276	<p>Other named groups / vehicles should receive exemptions / discounts</p> <p>We received 689 other comments about other named groups / vehicles which should receive exemptions / discounts which we have noted.</p> <p>Comments included:</p> <ul style="list-style-type: none"> - Should be discounts / exemptions for individuals with specific chronic medical conditions 	668	667	25	<p><u>Our response to ‘Should be discounts / exemptions for individuals with specific chronic medical conditions’</u></p> <p>People with chronic medical conditions that are also disabled may be eligible for the grace period exemption for those with a disabled tax class vehicle, which we are proposing to widen to include those who receive the standard rate of PIP (see Section 6.1)</p> <p>Some NHS patients are eligible for a reimbursement of the daily ULEZ charge for journeys to and from hospital and it is proposed that this would continue. See response C7.</p> <p><u>Our response to ‘Public service vehicles (PSVs) should be exempt’</u></p> <p>Buses, minibuses and coaches (over 5 tonnes) are not subject to the ULEZ. Instead they are required to comply with the LEZ standards, which were tightened to match the ULEZ standards London-wide</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<ul style="list-style-type: none"> - Public service vehicles (PSVs) should be exempt - Low-mileage users should be exempt - Emergency service workers using their own car for work should receive a discount / exemption - Shift workers should receive a discount / exemption - Students should receive a discount / exemption - Workers at Heathrow Airport should receive a 				<p>in March 2021. Non-compliant community transport minibuses operated by not-for-profit organisations are eligible for a grace period from the ULEZ daily charge. It is proposed to extend this grace period for not-for-profit community transport minibuses by two years to October 2025. This also applies to eligible organisations (including state schools) outside Greater London.</p> <p><u>Our response to 'Low-mileage users should be exempt'</u></p> <p>The ULEZ scheme does not monitor or charge by mileage. Experts have found that London will need a new kind of road user charging system by the end of the decade, alongside other measures, to achieve net zero carbon by 2030 and address air pollution and traffic congestion. This would enable all existing road user charges, such as the Congestion Charge, LEZ and ULEZ, to be replaced with a single scheme, and could include distance-based charging. The Mayor asked TfL to start exploring how this concept could be developed, while acknowledging that it is</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>discount / exemption</p> <ul style="list-style-type: none"> - Musicians should receive a discount / exemption - Non-residents should receive a discount / exemption - Anyone working within the zone should receive a discount / exemption - Existing vehicles should be exempt until they are replaced - Previously owned non-compliant vehicles should be exempt - Tourists should receive a 				<p>still some years away from being ready to implement such a scheme. We have engaged the public and stakeholders about their views on the elements that should be considered for inclusion in the design of a potential scheme, such as vehicle type, distance travelled and time of day. The outputs of that engagement are presented in sections 4.19-4.24 and 5.12-5.21 of this report. Any future proposals to introduce a new scheme would be subject to a further public and stakeholder consultation with information on detailed scheme proposals and their impacts.</p> <p><u>Our response to other comments</u></p> <p>The primary objective of the ULEZ is to reduce emissions and improve air quality to improve health. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme. See response C6.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		discount / exemption - Farmers should receive a discount / exemption - Military workers should receive a discount / exemption - Ministers of religion should receive a discount / exemption - Parents with young children should receive a discount / exemption - Horse-transportation vehicles should receive a discount / exemption				

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		- Funeral vehicles should receive a discount / exemption				
C25	C277	<p>Other comments about discounts and exemptions</p> <p>We received 352 other comments about discounts and exemptions which we have noted.</p> <p>Comments included:</p> <ul style="list-style-type: none"> - Opposition to exemptions for classic cars - There should be a grace period of a few hours to visit relatives in the zone - Non-compliant vehicles should be provided with an allowance for 	333	332	18	<p><u>Our response to 'Opposition to exemption for classic cars'</u></p> <p>The ULEZ currently exempts historic tax class vehicles on the basis that there are limited numbers and it is not practical or possible to upgrade or retrofit them without alterations that would result in a significant loss of historic character.</p> <p><u>Our response to 'There should be a grace period of a few hours to visit relatives in the zone / Non-compliant vehicles should be provided with an allowance for a limited number of free trips'</u></p> <p>The primary objective of the ULEZ is to reduce emissions and improve air quality to improve health. The number of grace periods, discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		a limited number of free trips				

Other stakeholder comments

5.4.2. We have noted these additional comments from stakeholders that are not included in the tables above.

5.4.3. Several stakeholders requested further discounts and exemptions from the ULEZ charge:

- Chris Grayling MP recommended a buffer zone at the edge of the expanded ULEZ provide to provide exemptions for those outside Greater London. He also suggested vehicles from outside Greater London making short trips through the expanded ULEZ should be exempted.
- The London Assembly Transport Committee considered the current discounts and exemptions are too strict.
- Elmbridge Borough Council requested exemptions for those seeking work in Greater London but currently living outside the proposed expanded ULEZ.
- Tatsfield Parish Council requested a grace period for its residents.
- Surrey County Council requested an exemption for non-compliant private hire vehicles registered to their licensing authority.
- The Royal Borough of Greenwich and LB Hounslow requested exemptions for their specialist fleet vehicles required to meet their statutory obligations, given the high cost of replacement vehicles.
- Asthma + Lung UK suggested exemptions should be extended to people with severe lung conditions who will still rely on their cars to carry out day-to-day tasks or attend medical appointments and specialist treatments.
- The John Lewis Partnership recommended exemptions are provided for freight operators using the cleanest and quietest vehicles.
- Bristol Ambulance EMS and the East Sussex Medical Event Service requested exemptions for emergency vehicles.

- The RAC recommended that specialist recovery vehicles are exempted due to their high replacement cost. They further requested the recovery vehicle industry be exempted from ULEZ.
- The West Wickham Residents Association requested exemptions for older people to attend church and community services.

Our response: *The primary objective of the ULEZ is to reduce emissions and improve air quality. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme. See response C6.*

5.4.4. Several stakeholders commented on the administration of the NHS reimbursement scheme

- The London Assembly Transport Committee recommended a review of the NHS reimbursement scheme including how it is publicised and administered via reimbursement by NHS trusts.
- Transport for All commented that the process of applying for NHS reimbursements is complicated and burdens disabled people with additional paperwork and stress at a time during which they are ill and receiving treatment.
- Transport & Health Science Group suggested working with relevant charities to ensure information on the NHS reimbursement scheme is disseminated well and the scheme is fully utilised.
- Camden Friends of the Earth suggests that the NHS reimbursement scheme should offer refunds for journeys via taxi or private hire vehicle which is considered a better alternative than a refund of the charge.

Our response: *NHS reimbursement payments are handled directly by the participating NHS Trust. Patients can contact the hospital or coronavirus vaccination centre that treated them directly for further information. We will continue to work with the NHS and relevant charities to help disseminate information about the reimbursement.*

5.4.5. The London Asthma Leadership and Implementation Group for Children and Young People (LALIG) and London Borough of Camden recommended that the exemption for historic vehicles and showman's vehicles from ULEZ and other charging schemes be reviewed. ***Our response:*** *See response C25 for the exemption for historic vehicles. Showmans' vehicles are not subject to ULEZ. The 100 per cent discount for these vehicles applies to the LEZ scheme due to their construction which means they are not suitable for any form of abatement equipment to be fitted to them to make them compliant. The showmans' discount is not within the scope of this consultation.*

5.5. Implementation date

5.5.1. Table 41 provides a summary of the comments that were received around the proposed implementation date of 29 August 2023 for the ULEZ expansion London-wide.

Table 41: Responses to comments made about the implementation date

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
D1	C290	Proposed ULEZ expansion should be implemented sooner (i.e. sooner than 29th August 2023)	525	490	12	<p>When deciding on an implementation date for a scheme we have to balance the need to take action with operational aspects of scheme implementation and time for the public to prepare. We need to ensure that when a scheme is implemented, the correct infrastructure is in place including appropriate signage and systems have been developed.</p> <p>We also have to consider the period of time there is from the date of decision to implementation in terms of a notice period for individuals.</p> <p>29 August 2023 is considered to be a suitable date, which balances the need to take action against poor air quality in outer London, the operational aspects of scheme development and providing appropriate advance notice for individuals who may be affected by the scheme.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
D2	C291	Proposed ULEZ expansion should be delayed (i.e. implemented later than 29th August 2023)	3196	3194	61	See response D1.
D3	C292	Other comments about implementation date of ULEZ expansion We received 166 other comments about the implementation date of ULEZ expansion which we have noted. Comments included: - EV infrastructure should be expanded before implementation of ULEZ expansion	166	166	2	<u>Our response to 'EV infrastructure should be expanded before implementation of ULEZ expansion'</u> Our Electric Vehicle Infrastructure Strategy ⁷⁵ , published in December 2021, sets out our vision, addresses recent trends and policy changes, estimates the infrastructure needs to 2030 and considers how this could be delivered. There are over 10,000 publicly accessible charging points now available in London, accounting for a third of the UK total. Although electric vehicles are not subject to the charge, it is not required to drive an electric vehicle to avoid paying the charge, as there is no ULEZ daily charge for vehicles that meet the ULEZ emission standards (Euro 4 for petrol

⁷⁵ London's 2030 electric vehicle (EV) infrastructure strategy: <https://tfl.gov.uk/modes/driving/electric-vehicles-and-rapid-charging>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<ul style="list-style-type: none"> - Public transport should be improved before implementation of ULEZ expansion - Implementation of ULEZ expansion should be delayed until there is a better supply of compliant vehicles / give people more time to adjust 				<p>engine vehicles, Euro 6 for diesel engine vehicles and Euro 3 for motorcycles).</p> <p><u>Our response to 'Public transport should be improved before implementation'</u></p> <p>We are committed to ensuring that our public transport network is safe, affordable and accessible. Improving the accessibility of London's extensive public transport services helps to support and enhance the quality of life of Londoners.</p> <p>We are investing in public transport and delivering improvements across the network.</p> <p>On the Tube network, we opened the Northern Line extension to Battersea Power Station in September 2021, the first phase of the Bank Station upgrade in May 2022, and added eight step-free stations to the network in 2021/22.</p> <p>On our rail networks, we opened the Elizabeth Line in May 2022, and an extension of the London Overground to Barking Riverside in July 2022. We have also agreed with Government to add up to</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>11 more trains to the new DLR fleet of 43 trains currently under construction.</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 our fleet.</p> <p><u>Our response to 'Implementation of ULEZ expansion should be delayed until there is a better supply of compliant vehicles / give people more time to adjust'</u></p> <p>See response B25 and response D1.</p>

Other stakeholder comments

5.5.2. We have noted these additional comments from stakeholders that are not included in the tables above.

5.5.3. Several stakeholders referred to the current cost of living crisis and requested that if the scheme is to be implemented, that its launch is delayed until the cost-of-living crisis has ended:

- Essex County Council requested that implementation is delayed until the cost of compliant vehicles has reduced, noting the recent increases in vehicle costs, including the impact on the second-hand vehicle market.

- The RAC has raised similar concerns around forecast compliance levels at scheme launch, which they consider may be lower due to the increased cost of purchasing new and second-hand vehicles that are ULEZ compliant.
- LB Richmond expressed concern that current timings would mean people having to settle for whatever ULEZ compliant vehicle they can find rather than purchasing the most sustainable models.

Our response: 29 August 2023 was considered to be a suitable implementation date, which balances the need to take action against poor air quality in outer London, the operational aspects of scheme development and providing appropriate notice for individuals who may be affected by the scheme, if it is confirmed by the Mayor. The ULEZ Scheme IIA baseline highlights that the cost of living has been increasing across the UK since early 2021 and in March 2022, inflation reached its highest recorded level since 1992. In London 1 in 3 families with a disabled adult are living in poverty, compared to 1 in 4 families without a disabled adult. Following the consideration of points raised in this consultation, we have proposed modifications to the proposals to offer further support to disabled Londoners. These are described in section 6.1. Nearly all petrol vehicles sold from 2005 are compliant with the ULEZ standards. If the ULEZ is expanded London-wide in August 2023, compliant petrol vehicles for those that need to drive and own their own vehicle, will have been available for 18 years, so will be more affordable. Furthermore, for those eligible, the Mayor has committed to help through a large-scale and targeted scrappage scheme, if the ULEZ expansion London-wide is approved. This will help to support Londoners on low incomes and disabled Londoners, as well as micro businesses and charities, with the cost of upgrading their vehicle or choosing a sustainable alternative. See section 6.1, response B28 and response D1.

5.6. Scrappage scheme

- 5.6.1. Table 42 provides a summary of the comments that were received around a scrappage scheme for the proposed expansion of the ULEZ London-wide.

Table 42: Responses to comments made about a scrappage scheme

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
E1	C300	Support scrappage scheme	439	439	47	We have noted these comments.
E2	C301	Do not support scrappage scheme	431	431	1	<p>The previous scrappage scheme was an important mitigation for the central and inner London ULEZ. The Mayor's previous scrappage scheme totalled £61 million and scrapped over 15,200 vehicles by providing grants for low income and disabled Londoners to scrap non-compliant cars and motorcycles, and small businesses and charities to scrap non-compliant vans and minibuses.</p> <p>Should the ULEZ be expanded London-wide following consultation, the Mayor has committed to help those who need it most through a large-scale and targeted scrappage scheme.</p>
E3	C302	Scrappage scheme will not provide enough money to subsidise replacing a vehicle / should be provided with money for scrapping to	2000	2000	41	<p>In order to meet the ULEZ standards, petrol light vehicles must meet Euro 4 standards and diesel light vehicles must meet Euro 6 standards.</p> <p>Nearly all petrol vehicles sold from 2005 are compliant with the ULEZ standards. If the ULEZ is expanded London-wide in</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		upgrade / change to a compliant vehicle				August 2023, compliant petrol vehicles for those that need to drive and own their own vehicle, will have been available for 18 years, so will be more affordable. Our previous scrappage scheme which offered £2,000 for a car was extremely popular.
E4	C303	Scrapping vehicles is bad for the environment / scrapping perfectly good vehicles is counterproductive	2852	2851	12	<p>All scrappage must be done by authorised treatment facilities. These have strict targets and requirements around the re-use of parts from the vehicles, ensuring that the environmental impacts are minimised.</p> <p>Under the End-of-life vehicles (ELV) directive, there is a target for a minimum of 95 per cent recycling and recovery of ELVs, so the legislation is well designed to mitigate any increases in hazardous or non-hazardous waste generated from scrappage.</p>
E5	C304	Should not encourage car purchases / should encourage movement away from cars	397	385	10	The original scrappage proposal to government in 2017 stated that there were opportunities to work with transport industry as part of scrappage schemes to improve the potential for behaviour change and reducing car ownership.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>The results of the scrappage survey for the previous car and motorcycle scrappage scheme showed that one-third of successful applicants did not use the grant payment to buy a replacement vehicle. 22 per cent stated their household no longer owns a vehicle. This highlights that scrappage schemes are effective in reducing car ownership and therefore it is necessary to work with the transport industry to support with mode shift to sustainable modes of transport.</p> <p>For the previous scrappage scheme, we worked with industry to offer third party offers that were available to successful recipients of the car, motorcycle, van and minibus scrappage scheme to support mode shift.</p> <p>We have developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
E6	C305	Unfair that will need to upgrade again after only upgrading recently but still being classed as non-compliant (e.g. previously upgraded due to government incentives but still non-compliant)	1989	1987	1	<p>See response A21.</p> <p>For the proposed expansion of ULEZ London-wide, we have maintained the standards that are currently in place for the existing ULEZ, covering inner London.</p> <p>Government has previously advised people that diesel vehicles are cleaner because of their lower carbon dioxide emissions and higher fuel efficiency. However, we now know diesel engine exhaust emissions are carcinogenic to humans and that the real-world emissions of diesel engines are drastically worse when driven in dense urban environments, such as London. These issues, linked with the trend of more people buying diesel vehicles, has caused a significant increase in pollution and therefore a delay in our efforts to meet legal and safe air quality limits. The ULEZ standards allow diesel vehicles to be driven in the zone without paying a charge, however they will need to meet the latest Euro 6 standard as these vehicles are, on average, far less polluting.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
E7	C306	Scrappage scheme should be available to everyone	1278	1278	54	<p>The Mayor continues to call for a national scrappage scheme, to support those outside of London. The Government has provided scrappage funding in other cities, including Birmingham, Manchester and Portsmouth, but has not extended the same support for London. If a national scheme is not forthcoming, the Mayor has requested specific funding from the Government for a local London scheme.</p> <p>With a finite amount of funding available, a scrappage scheme will be most effective when funds are targeted at those who will be disproportionately negatively impacted and less able to avoid the charge without mitigation or appropriate support. This has been informed by the ULEZ Scheme IIA, stakeholder engagement and consultation responses. See section 6.1.</p>
E8	C308	Suggest providing incentives to use sustainable transport / active travel as part of scrappage scheme or instead of a scrappage scheme (e.g. provide	113	111	37	<p>For the previous scrappage scheme, we worked with industry to offer third party offers that were available to successful recipients of the car, motorcycle, van and minibus scrappage scheme to support mode shift.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		vouchers towards purchasing bicycles)				We have developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.
E9	C307	<p>Other comments about scrappage scheme</p> <p>We received 326 other comments about a scrappage scheme which we have noted.</p> <p>Comments included:</p> <ul style="list-style-type: none"> - Scrappage scheme will have limited impact as compliant second-hand vehicles are expensive / not readily available - Should be alternative to scrappage such as upgrading / 	301	301	35	<p><u>Our response to ‘Scrappage scheme will have limited impact as compliant second-hand vehicles are expensive / not readily available’</u></p> <p>See response B25.</p> <p><u>Our response to ‘Should be alternative to scrappage such as upgrading / converting non-compliant vehicles’</u></p> <p>In order to meet the ULEZ standards there is no need to purchase a brand-new or electric vehicle. Nearly all petrol vehicles sold from 2005 are compliant with the ULEZ standards (with some being available since 2000), so by the time the ULEZ expands compliant vehicles will have been available for 18 years. Market research shows that there is good</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>converting non-compliant vehicles</p> <ul style="list-style-type: none"> - Scrappage scheme should accommodate need for disability adapted vehicles - Scrappage applications should be processed faster 				<p>availability for second-hand vehicles with more affordable options available.</p> <p>The previous scrappage scheme offered a retrofit offer for heavy vehicles. Since then, a retrofit option for vans has become available and the proposed new scrappage scheme could include an option for vans and minibuses to either scrap or retrofit a vehicle.</p> <p><u>Our response to ‘Scrappage scheme should accommodate need for disability adapted vehicles’</u></p> <p>In response to the consultation and engagement with stakeholders, we have developed a new grace period for all Wheelchair Accessible Vehicles, as well as where some other adaptations may also apply. See Section 6.1. Those who qualify for this may not need to change their vehicle for the duration of the grace period.</p> <p>In addition, the scrappage scheme offers an alternative for disabled Londoners. For the previous scheme the Mayor provided £61 million to fund scrappage schemes, targeted at low income and disabled</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>Londoners, small businesses and charities.</p> <p>For the London-wide scheme, if confirmed, the Mayor has committed to implementing a large-scale and targeted vehicle scrappage scheme. Proposals for the new scheme, including the value of the fund and who can apply for it has been informed by the Integrated Impact Assessment, responses to the consultation and stakeholder engagement. It is proposed that disabled Londoners would now also be able to apply for scrappage on behalf of a designated nominated driver who does not live with them. See section 6.1.</p> <p><u>Our response to ‘Scrappage applications should be processed faster’</u></p> <p>A successful application for funding to scrap a vehicle through the Mayor’s scrappage schemes comprises two stages. During both stages, we rely on the applicant to provide the requisite information to enable a full and thorough assessment of their application, ensuring</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>that funding is only granted to those who are entitled to receive it.</p> <p>While we endeavour to process applications as quickly as possible, we do advise applicants that it can take up to 10 days to consider their initial application and supporting documents in order to confirm whether they meet the eligibility criteria for funding. If they are eligible, the application progresses to the second stage of the process and the applicant is given a set amount of time to scrap or retrofit their vehicle and provide proof of such to TfL. Again, it can take up to 10 days from the date of receipt to properly review the evidence and let the applicant know whether it is acceptable. If the evidence is deemed acceptable, we will raise a cheque for the value of the grant payment at this point and send it to the applicant's registered address.</p>

Other stakeholder comments

5.6.2. We have noted these additional comments from stakeholders that are not included in the tables above.

5.6.3. John Cruddas MP and Gareth Bacon MP suggested that scrappage scheme eligibility should be based on household income rather than being a recipient of income support benefits. ***Our response:*** *We have noted this comment.*

5.6.4. The following stakeholders raised concerns over the lack of detail in the consultation documents or requested more information on the scrappage scheme, which did not form part of the consultation proposals:

- Gareth Bacon MP
- Bob Steward MP
- Royal Borough of Greenwich
- London Borough of Hillingdon
- London Borough of Enfield
- Royal Borough of Kingston
- London Borough of Richmond
- Essex County Council
- GLA Conservatives
- GLA Liberal Democrats
- Bexley Labour Group
- Shaun Bailey AM
- Keith Prince AM
- Joanne McCartney AM
- Councillor Thomas Turrell (LB Bromley)
- Councillor David Leaf (LB Bexley)
- West Beckenham Residents Association

Our response: *For the future scheme, if confirmed, the Mayor has committed to implementing a large-scale and targeted vehicle scrappage scheme. Details of the new scheme, including the value of the fund and who can apply for it has been informed by the ULEZ Scheme IIA, responses to the consultation and stakeholder engagement. See section 6.1.*

5.6.5. The following stakeholders raised concerns that residents outside Greater London would be ineligible to access funding from the scrappage scheme and/or requested residents outside Greater London are included in the scrappage scheme:

- Gareth Johnson MP
- Essex County Council
- Hertfordshire County Council
- Buckinghamshire Council
- Surrey County Council
- Elmbridge Borough Council
- Epping Forest District Council
- Epsom and Ewell Borough Council
- Gravesham Borough Council
- Guildford Borough Council
- Reigate and Banstead Borough Council
- Slough Borough Council
- Spelthorne Borough Council
- Sevenoaks District Council
- Mole Valley District Council
- Dartford Borough Council
- Thurrock Borough Council
- Tandridge District Council (Officer and Leader)
- Claygate Parish Council
- Westerham Town Council
- Warlingham Parish Council
- Woldingham Parish Council
- Dartford Conservative Association
- Councillor Drew Swinerd (Dartford BC)
- Councillor Nick Harrison (Reigate and Banstead BC)
- Maypole and Leyton Cross Ward Councillors (Dartford BC)
- Enterprise M3

Our response: See response E7.

5.6.6. The following stakeholders raised concerns around the previous scrappage scheme that accompanied the expansion of ULEZ to inner London. This included concerns around the amount of funding available in the previous scrappage scheme and concerns that people had previously missed out:

- Merton Conservatives
- Gareth Bacon MP
- Councillor Thomas Turrell (LB Bromley)
- Feryal Clark MP
- Transport Health and Science Group
- Haringey Cycling Campaign
- West Wickham Residents Association

Our response: We have noted these comments and have taken them into consideration in developing our proposal for a new scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. The scrappage scheme eligibility will be London-wide and include residents within the existing ULEZ. The Mayor continues to call for a national scrappage scheme, to support those outside of London. The Government has provided scrappage funding in other cities, including Birmingham, Manchester and Portsmouth, but has not extended the same support for London. If a national scheme is not forthcoming, the Mayor has requested specific funding from the Government for a local London scheme. See response E7.

5.6.7. Some stakeholders suggested further central government funding for a scrappage scheme, requesting central government funding and/or a national scrappage scheme:

- Ruth Cadbury MP
- Hertfordshire County Council
- London Borough of Islington
- London Assembly Transport Group
- Sian Berry AM
- Bromley Labour Group
- Greater Kent Committee

Our response: We have noted these comments. The Mayor continues to call for a national scrappage scheme, to support those outside of London. The Government has provided scrappage funding in other cities, including Birmingham, Manchester and Portsmouth, but has not extended the same support for London. If a national scheme is not forthcoming, the Mayor has requested specific funding from the Government for a local London scheme. See response E7.

- 5.6.8. LB Brent suggested a scrappage scheme should specifically target areas experiencing the worst air quality. ***Our response:*** We have noted this comment.
- 5.6.9. LB Harrow suggested a compensation scheme to enable people to replace more polluting vehicles independent of ULEZ. ***Our response:*** We have noted this comment.
- 5.6.10. The Clean Cities campaign suggested the scrappage scheme should prioritise those purchasing shared services, bicycles and public transport by providing recipients with a larger payment. They state the scheme should not simply encourage the replacement of non-compliant vehicles with slightly newer compliant vehicles. ***Our response:*** See response E8.
- 5.6.11. Harrow Community Transport requested they be prioritised in the scrappage scheme. ***Our response:*** We have noted this comment. To support charities, non-compliant community transport minibuses operated by not-for-profit organisations are eligible for a grace period from the ULEZ daily charge. It is proposed to extend the grace period for not-for-profit community transport minibuses by two years to October 2025. This will also apply to eligible not-for-profit organisations outside Greater London.

5.7. Mitigations and suggestions

- 5.7.1. Table 43 provides a summary of the comments that were received around potential mitigations and suggestions to improve transport.

Table 43: Responses to comments made about mitigations and suggestions

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
F1	C390	Need to invest / improve public transport (general comments) (e.g. more frequent, more routes, availability and accessibility in areas etc)	2840	2822	81	<p>We are continuing to invest in improving public transport.</p> <p>On the Tube network, we opened the Northern Line extension to Battersea Power Station in September 2021, the first phase of the Bank Station upgrade in May 2022, and added eight step-free stations to the network in 2021/22.</p> <p>On our rail networks, we opened the Elizabeth Line in May 2022, and an extension of the London Overground to Barking Riverside in July 2022. We have also agreed with Government to add up to 11 more trains to the new DLR fleet of 43 trains currently under construction.</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 our fleet.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
F2	C391	Need to encourage / incentivise more use of public transport (e.g. should make it cheaper)	1908	1893	55	<p>See response F1.</p> <p>We are committed to ensuring that our public transport network is safe, affordable and accessible. Improving the accessibility of London's extensive public transport services helps to support and enhance the quality of life of Londoners.</p> <p>We work hard to deliver an equitable, accessible and inclusive system that works for everyone. We are seeking to maintain and enhance connectivity through improvements that meet the needs of a changing London, faster journeys that encourage public transport use and providing the capacity to ensure that Londoners can rely on the connectivity being available when they need it.</p> <p>As part of our proposal for a scrappage scheme, successful applicants can also opt for mobility credits (an annual Bus & Tram pass) alongside a reduced scrappage payment. There will also be an option for two annual Bus & Tram passes alongside a reduced scrappage payment which may be attractive to those who transport others with their vehicle. See section 6.1.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
F3	C392	Needs to be more investment in active travel (walking, cycling, infrastructure, pedestrianisation)	188	170	29	<p>We are continuing to invest in active travel. We have supported boroughs to deliver more than 100 Low Traffic Neighbourhoods and there are now more than 500 School Streets in London. We have expanded our strategic cycle network by almost 250km since 2016, with one in five Londoners now living within 400m of a cycleway. We are also providing more cycle parking, including over 5,000 spaces funded or delivered by us since 2020 in a range of locations including town centres, rail stations and residential neighbourhoods. We continue to improve safety to make it easier for people to choose to walk or cycle. The Safer Junctions programme has improved 43 dangerous junctions in London and nearly half of the Capital's roads now operate on a 20mph speed limit.</p> <p>We will continue to improve walking, cycling and public transport alternatives, including further investment in Healthy Streets, and delivering our Walking, Cycling and Bus action plans. This includes supporting boroughs to continue to deliver School Streets and Low Traffic Neighbourhoods,</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						investing £4m Green New Deal funding into providing new green infrastructure in residential areas and on strategic active travel corridors and continuing to expand the cycle network so that it reaches more Londoners. Alongside this, we will maintain our focus on safety, with next steps set out in our Vision Zero action plan progress report.
F4	C393	Need to encourage / incentivise more use of active travel (walking, cycling)	464	411	39	<p>See response F3.</p> <p>Creating Healthy Streets that work for everyone and are accessible, safe and inclusive is a priority for us. We will continue to deliver on these to ensure that Londoners have attractive and safe active travel options.</p> <p>We are working to deliver our Walking and Cycling action plans, which include infrastructure and non-infrastructure measures to make walking and cycling accessible and inclusive.</p> <p>Recipients of the Mayor's previous scrappage scheme reported higher levels of walking and cycling after scrapping a vehicle. If the London-wide ULEZ is confirmed, we propose that the</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						accompanying scrappage scheme would include a number of third party offers which would incentivise active travel.
F5	C394	Needs to be more encouragement / investment in other transport related schemes / areas to improve air quality/congestion/en vironment	874	863	18	<p>Improvements in London's air quality are continuing as a result of the Mayor's air quality programme.</p> <p>The new London Atmospheric Emissions Inventory was released in December 2021, providing an update to previous iterations and a new 2019 baseline. This shows a more than 90 per cent reduction in the number of Londoners living in areas exceeding legal limits for NO₂ between 2016 and 2019. There has also been a near-doubling of major roads in London meeting NO₂ legal limits from 46 per cent in 2016 to 84 per cent in 2019.</p> <p>However, while significant progress has been made, data shows that nitrogen oxides emissions from road transport reduced at just half the rate in outer London as they did in central and inner London. Recent research also found that the greatest number of deaths attributable to air pollution were in outer London boroughs, mainly</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>because of the higher proportion of older people in these areas.</p> <p>The proposal to expand the ULEZ London-wide is one of the schemes that will deliver air quality benefits to outer Londoners. Other schemes include:</p> <ul style="list-style-type: none"> - Working with boroughs and the private sector to increase the number of EV charging points by 85 per cent between 2019 and 2021, with more than 10,000 publicly accessible charging points now available in London, accounting for a third of the UK total. - Continuing to transition our bus network to zero-emission vehicles, with over 850 electric buses now in the fleet.
F6	C395	Needs to be more investment in electric vehicles / EV infrastructure	1518	1514	40	<p>See response F5.</p> <p>Our London Electric Vehicle Infrastructure Strategy⁷⁶, published in December 2021, sets out our vision, addresses recent trends and policy changes, estimates the</p>

⁷⁶ London's 2030 electric vehicle (EV) infrastructure strategy: <https://tfl.gov.uk/modes/driving/electric-vehicles-and-rapid-charging>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						infrastructure needs to 2030 and considers how this could be delivered.
F7	C396	Need to encourage / incentivise more use / switching to electric vehicles	725	721	25	Our Electric Vehicle infrastructure strategy outlines how we seek to accelerate the transition to zero-emission vehicles, with a focus on essential trips. However, electric vehicles still contribute to air pollution through tyre and brake wear, traffic congestion and road danger. The MTS targets a sustainable mode share of 80 per cent by 2041 which will require the majority of journeys to switch away from car. We do however also need to transition essential traffic to the cleanest possible vehicles.
F8	C397	Needs to be more investment in alternative fuel sources	173	171	4	We have noted these comments.
F9	C398	Needs to be more encouragement / investment in other schemes / areas not specifically related to transport (e.g. high streets, crime rates, pedestrian safety etc)	753	753	3	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
F10	C400	Need to target other sources of air pollution (e.g. airports, new developments, wood burners)	1837	1833	22	<p>Expanding the ULEZ London-wide is one measure that helps to target air pollution, but we agree that more needs to be done to tackle the range of air pollutant sources.</p> <p>The London Environment Strategy (LES, 2018) published by the Greater London Authority sets out how the Mayor will address a range of air pollution sources in London. The Strategy is clear that to achieve legal compliance as quickly and effectively as possible, all sources of pollution must be addressed. Policy 4.2.2 of the LES commits to reducing emissions from non-road transport sources, including by phasing out fossil fuels. This includes working with government and other partners to reduce emissions from sources where the Mayor has weaker or no powers. The LES also proposes to reduce emissions from constructure sites, homes and workplaces through energy efficiency programmes and waste sites. Progress reports are available online here:</p> <p>https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/london-environment-strategy.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						Policy T8 of the London Plan states that any airport expansion scheme must be appropriately assessed and if required demonstrate that there is an overriding public interest or no suitable alternative solution with fewer environmental impacts. The Mayor has stated that he fails to see how any airport expansion can be justified, being incompatible with achieving the UK's net zero target.
F11	C401	Suggest improving cycling infrastructure	809	771	41	<p>See response F3.</p> <p>Our investment in cycling infrastructure has led to the highest, safest and most inclusive levels of cycling on record. The significant expansion of the cycle network means that 20 per cent of Londoners now live within 400 metres of our Cycleways network. This highlights our progress towards one of our key targets in the Cycling Action Plan; increasing the proportion of Londoners living within 400 metres of the London-wide cycle network to 28 per cent by 2024.</p> <p>To support more people cycling, as part of our cycle parking implementation plan, we have also delivered more than 5,000 cycle parking spaces in the past two years</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						working with London boroughs, split across residential cycle hangars, on-street parking in town centres and cycle parking at schools and London Underground stations. We also continue to deliver the Santander Cycles hire scheme, with 11.9 million hires taking place in 2021/22 and 500 e-bikes introduced to the scheme in October 2022.
F12	C402	Suggest improving the safety of cyclists	369	353	14	<p>See response F11.</p> <p>Our Vision Zero programme aims to eliminate all deaths and serious injuries on London's streets by 2041. Our response is based on a safe road system with every component working together including safe speeds, safe streets, safe vehicles and safe behaviours. This will help to ensure that we reduce road danger and protect Londoners from harm.</p> <p>The Safer Junctions programme continues to target locations on our streets where the greatest numbers of people have been killed or injured while walking, cycling or riding motorcycles. We have also introduced a 20mph speed limit on 108km of the TLRN and 19 of the 33 London boroughs (including City of London) have committed to</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						a 20mph default speed limit on over 70 per cent of their roads. Lowering speeds is key to reducing both the likelihood of a collision occurring and the severity of the outcome.
F13	C403	Suggest improving walking infrastructure	255	242	36	<p>See response F3.</p> <p>Creating Healthy Streets that work for everyone and are accessible, safe and inclusive is a priority for us.</p> <p>We published our Walking Action Plan which sets out how we will work with our stakeholders to make walking the easiest and most attractive way of making short trips in London.</p> <p>We have already invested in measures to improve conditions for walking, cycling and public transport, including reallocation of road space to these modes. Monitoring shows that this is having a positive impact. Data from surveys we commissioned on Low Traffic Neighbourhoods found increased walking and cycling as a result of their implementation.</p>
F14	C404	Suggest improving safety of pedestrians	146	141	8	<p>See response F13.</p> <p>Improving safety for pedestrians is an important part of delivering on the Mayor's</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>Transport Strategy. The Safer Junctions programme targeting locations where the greatest numbers of people have been killed or injured while walking, cycling or riding motorcycles.</p> <p>The Safer Junctions programme has improved 43 dangerous junctions in London and nearly half of the Capital's roads now operate on a 20mph speed limit.</p> <p>There have now been more than 100 Low Traffic Neighbourhoods delivered across London, making it safer and easier for residents and families to get around their local area on foot and by bike. Pan-London analysis conducted by the University of Westminster using police data showed the traffic-related injuries within LTNs reduced by half in comparison to the background trend, with no statistically significant change in injuries on LTN boundary roads⁷⁷.</p>
F15	C405	Need to improve public transport in central / inner London	44	44	1	See response F1.

⁷⁷ Delivering the Mayor's Transport Strategy 2021/22: <https://content.tfl.gov.uk/tfl-mts-update-14-july-2022-acc.pdf>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
F16	C406	Need to improve public transport in outer London	976	975	60	<p>See response F1.</p> <p>Outer London has historically been more dependent on car travel, but we know that walking, cycling and public transport are safer, cleaner, cheaper and more efficient alternatives. A key objective of the MTS is to make it easier for those travelling in outer London to shift towards these options. We have also made recent improvements that benefit outer London including opening the Elizabeth Line in May 2022, and an extension of the London Overground to Barking Riverside in July 2022. We have also agreed with Government to add up to 11 more trains to the new DLR fleet of 43 trains currently under construction.</p> <p>Our Bus Action Plan highlights the vital role bus travel will have in achieving this in outer London, and sets out how we will deliver the high-quality bus service London needs.⁷⁸</p>
F17	C407	Need to target / reduce noise pollution (e.g. noise from traffic)	106	101	2	<p>Although noise is part of a vibrant city, excessive noise can damage people's health and contribute towards a range of physical and mental health problems, disturb</p>

⁷⁸ Bus Action Plan: <https://content.tfl.gov.uk/tfl-mts-update-14-july-2022-acc.pdf>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>sleep and affect people's hearing, communication and learning.</p> <p>Reducing the noise impacts of motor traffic will directly benefit health, improve the ambience of street environments and encourage active travel and human interaction. Proposal 48 of the Mayor's Transport Strategy sets out how we can reduce the number of Londoners exposed to excessive noise levels from road transport. This includes reducing traffic volumes by encouraging mode shift from travelling by car to walking, cycling and using public transport.</p>
F18	C408	ULEZ charges should be based on miles travelled / charged per mile	335	330	4	<p>The ULEZ scheme does not charge by distance driven. However, experts have found that London will need a new kind of road user charging system by the end of the decade, alongside other measures, to achieve net zero carbon by 2030 and address air pollution and traffic congestion. This would enable all existing road user charges, such as the Congestion Charge and ULEZ, to be replaced by a single scheme. The Mayor has asked TfL to start exploring how this concept could be</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>developed, while acknowledging that it is still many years away from being ready to implement such a scheme.</p> <p>As we are at an early stage in our thinking on how we could replace existing road user charging with a simple, fair scheme we have not proposed a specific scheme in this consultation. Instead, we have engaged on Londoners' views on the challenges that a potential scheme could address, and the elements that should be considered for inclusion in the design of a potential scheme, such as vehicle type, distance travelled and time of day. Outputs from this engagement are included in sections 4.19 – 4.24 and 5.12 – 5.21 of this report.</p>

Other stakeholder comments

5.7.2. Several stakeholders suggested amendments to the scheme boundary either as mitigation or to improve the scheme:

- Chris Grayling MP suggested there should be a buffer zone set inside the London boundary, or, alternatively, vehicles from outside of London who travel a short distance across the boundary should be exempt.
- Feryal Clark MP asked that that Bullsmoor Lane, including the A10 and Hertford Road, be included in the LEZ and the expanded ULEZ boundary to reduce air pollution and the flow of HGVs in the local area. Councillor Ayten Guzel (LB Enfield) similarly suggested that the zone is expanded to the entire GLA boundary, not just the LEZ boundary, as some

of the outlying roads are the most polluted due to the high volume of HGVs, also citing Bullsmoor Lane in Enfield an example.

- Councillor Robert Evans (Surrey CC) asked for the boundary to continue down Stanwell Road to the junction with the A30 as this would allow Surrey residents not intending to enter London to better avoid the zone.
- LB Waltham Forest noted some residents and businesses will remain outside of the ULEZ as the proposed boundary is the same as the existing LEZ. They are seeking further information about traffic displacement, increased pollution and parking stress on the boundary. They were particularly concerned about the impact of traffic on Epping Forest. Their preference is that ULEZ covers all of the borough and have asked that this option is explored.
- Reigate and Banstead BC suggested the boundary be drawn to exclude the new (in development) Sutton Hospital and Royal Marsden Hospital.

Our response: *The LEZ boundary is considered suitable for the proposed London-wide ULEZ as it broadly follows the Greater London Authority boundary, is already in place, and was specifically designed so it provides opportunities for non-compliant vehicles to divert away from travelling into London.*

- 5.7.3. Several stakeholders suggested specific ways in which revenue from the scheme could be invested:
- City of Westminster asked for investment in addressing taxi idling at mainline stations;
 - LB Lambeth asked for public transport improvements on east-west links in the borough; and
 - Badgers Mount Parish Council suggested funding improvements on the R5 and R10 bus routes.

Our response: *All revenue from London's road user charging schemes that is not spent on implementation or operational costs must by law be used to facilitate the delivery of the Mayor's Transport Strategy, which includes improving public transport and making enhancements for people walking and cycling.*

- 5.7.4. LB Camden suggested progressively tightening compliance standards focusing initially on central London, then inner London and finally outer London as part of a transition to road user charging. ***Our response:*** *It is important to strike a balance between air quality improvements (achieved through vehicle emissions standards) and the impact on individuals and businesses in terms of the costs of meeting these standards. The current emissions standards help to achieve this balance and are not proposed to be changed as part of the expansion of the ULEZ London-wide. Any changes to emissions standards or future proposals to introduce a new scheme would be subject to a further public and stakeholder consultation with information on detailed scheme proposals and their impacts.*

- 5.7.5. LB Hounslow requested support to those who commute to the borough from outside the GLA boundary to minimise impact on the labour market. LB Richmond suggested enabling existing users of non-compliant ULEZ vehicles who live within London to continue to use them so that ULEZ charges would apply only to people who do not live within ULEZ, new residents and non-compliant vehicles purchased from 2023. **Our response:** *The number of discounts and exemptions available has been limited, in order not to undermine the objective of the scheme. See response C6.*
- 5.7.6. Several non-Greater London local authorities requested enhancements to cross-boundary sustainable transport and expressed concern that their residents would not have access to a scrappage scheme / wanted to see discounts and exemptions extended to their residents:
- Councillor Nick Harrison (Reigate and Banstead BC) asked for the boundary to be redrawn to exclude hospitals just inside the proposed boundary. He also asked for TfL support in funding cross-boundary bus services.
 - Surrey CC suggested extension of the Oyster Card beyond Zone 6 before implementation and clear boundary signs.
 - Spelthorne BC suggested including the borough in Zone 6 would do more to enhance air quality. They also asked for the provision of discounted travel to London to be considered.
 - Epsom and Ewell BC requested that significant roads that provide access to key highway corridors, transport facilities and local amenities be exempted routes when they pass through the ULEZ.

Our response: *The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme. See response C6. The LEZ boundary is considered suitable for the proposed London-wide ULEZ as it broadly follows the Greater London Authority boundary, is already in place, and was specifically designed so it provides opportunities for non-compliant vehicles to divert away from travelling into London. We are supporting the DfT in developing its plans to expand contactless pay-as-you-go (PAYG) acceptance to stations across South East England. Should contactless PAYG be available at those stations we would need to work with DfT and the TOC to establish the fares they want to charge on their services. We remain available and willing to support stakeholders and TOCs / DfT to establish whether these stations can be accommodated in Oyster. This process will need to start with the TOC / DfT sharing fares proposals with us for analysis. The Greater London Authority (GLA) Act 1999 states that TfL is required to provide or secure the provision of public passenger transport services to, from and within Greater London. In the case of cross-boundary bus services this usually involves the provision of a link to the first main centre outside Greater London, but as with all TfL bus services this is subject to continuous review and is subject to there being a business case. In some cases, external funding, e.g. from local authorities, is used to supplement TfL funds to enable us to provide more*

cross-boundary services than we otherwise would do. In most cases we provide one bus route from an external town centre into London.

- 5.7.7. Zipcar suggested incentivising the use of car clubs. **Our response:** *Car clubs can play an important role in assisting Londoners who want to move away from private car ownership. Proposal 19 of the Mayor's Transport Strategy supports the provision of car clubs when paired with a reduction in the availability of private parking. Car club provision should be considered on a case-by-case basis to ensure it contributes to reduced levels of overall car use. We continue to work with the car club industry on ways to support Londoners to reduce their car use, and in particular on third party offers that can support those scrapping a vehicle to switch their journeys to walking, cycling, public transport or compliant car club vehicle.*
- 5.7.8. Federation of Small Businesses suggested introducing a project bank account for any small business paying the charge from August 2023/4 to August 2025. The funds would be protected in a TfL ULEZ Bank Account, and a business would be able to use the funds towards purchasing a new or second hand-vehicle – subject to an upper limit. If the fund is unspent then the money will go to TfL. **Our response:** *All revenue from London's road user charging schemes that is not spent on implementation or operational costs must by law be used to facilitate the delivery of the MTS, which includes improving public transport and making enhancements for people walking and cycling. TfL has also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.*
- 5.7.9. Enfield and District Veteran Vehicles Society noted that historic vehicles are used infrequently, and often driven out of London to historic vehicle club events. They suggested not charging on Sundays, or for users to pay a yearly fee that would be more representative of their limited use. **Our response:** *Historic vehicles (those built more than 40 years ago, with a historic tax class), and all vehicles constructed before 1 January 1973 are exempt from ULEZ charges. See response C6.*
- 5.7.10. Royal College of Nursing recommended that the Mayor of London and NHS employers provide financial support to nursing staff whose vehicle does not comply with the ULEZ emissions standards. They also proposed a pre-payment scheme is developed by the Mayor's Office which would enable employers to pay in advance, removing the need for staff to claim back costs associated with their role. **Our response:** *Some specific NHS staff journeys in the Congestion Charge Zone are eligible for reimbursement. This is in recognition of the fact that a vehicle may be the most appropriate mode of transport for certain types of trips, such as transporting medical equipment or responding to an emergency. The ULEZ charge is different to the Congestion Charge. Its purpose is to address harmful emissions from road transport by targeting only the most polluting vehicles. Only vehicles that don't meet the standards must pay the daily charge and affected drivers can*

choose to upgrade their vehicle or walk, cycle or use public transport rather than paying the charge. In order to maximise the air quality benefits of the scheme there are very limited discounts and exemptions available. For this reason, there is no reimbursement scheme for NHS staff for the ULEZ. See response C6.

- 5.7.11. The London Association of Directors of Public Health suggested monitoring access to health care and disruptions to people's lives and social circles during implementation so that that any negative consequences of the ULEZ expansion might be mitigated. **Our response:** *As part of ongoing monitoring we will review the impact of the ULEZ after its implementation. We have noted this comment and will take it into consideration when designing any such monitoring.*
- 5.7.12. The Transport Health and Science Group called for further progressive reductions in the taxi age limit, particularly for the most polluting Euro 3,4 and 5 vehicles, to a maximum of 8 years. **Our response:** *The phased approach to diesel taxi age limits, alongside support for delicensing and the uptake of Zero Emission Capable (ZEC) taxis, means we are on track to meet the 2025 legal requirement to reduce NO_x emissions from taxis by 65 per cent compared to 2013 levels.*
- 5.7.13. Crisis suggested that consideration be given to purpose of journeys, noting they sometimes use non-compliant fridge vans to transport food, but do not have the means to upgrade their vehicles in the same way as large retailers. **Our response:** *The primary objective of the ULEZ is to reduce emissions and improve air quality. The number of discounts and exemptions available to the scheme has been limited, in order not to undermine the objective of the scheme. We have also developed a proposal for a scrappage scheme which could be launched if the Mayor decides to expand ULEZ London-wide. Londoners on low incomes, disabled Londoners, charities and some micro businesses will be eligible for the scheme. See section 6.1.*
- 5.7.14. Transport for All highlighted that disabled people face additional barriers to using electric vehicles, noting charging points being installed by councils are not always accessible. **Our response:** *There is no requirement to switch to an electric vehicle to comply with the ULEZ standards. Our London Electric Vehicle Infrastructure Strategy has accessibility as one of its key themes, based on the principle that electric vehicle charging should be physically accessible, available, easy to use and should not impede or constrain people's movements on footways. We encourage London boroughs and charge point operators to use our London Electric Vehicle Charge Point Installation Guidance⁷⁹ and to use PAS 1899:2022⁸⁰, a new specification on accessible public charge points, which was launched on 11 October 2022.*

⁷⁹ <https://tfl.gov.uk/modes/driving/electric-vehicles-and-rapid-charging#on-this-page-4>

⁸⁰ <https://www.bsigroup.com/en-GB/our-services/events/webinars/pas-1899-launch>

5.8. Penalty Charge Notice levels for ULEZ and Congestion Charge

5.8.1. Table 44 provides a summary of the comments that were received around increasing the level of the Penalty Charge Notice (PCN) from £160 to £180 for the ULEZ and Congestion Charge (Proposal 3).

Table 44: Responses to comments about the Penalty Charge Notice

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
G1	C330	Support proposed PCN increase (i.e. £180 rather than £160) / should be higher	67	67	11	We have noted these comments.
G2	C331	Oppose proposed PCN increase (i.e. £180 rather than £160) / should be lower	617	617	8	<p>We are proposing to increase the penalty charge to maintain the deterrent effect and achieve the scheme objectives for the ULEZ and Congestion Charge.</p> <p>Over time the deterrent effect of receiving a Penalty Charge Notice (PCN) has decreased. This is due to a number of factors including inflation, increases to public transport fares and, particularly for the Congestion charge, the level of the charge itself reducing the relative disbenefit of the penalty charge.</p> <p>The proportion of Vehicle Registration Marks (i.e. the vehicle's registration number)</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>given multiple PCNs has increased for both schemes. In 2018, the proportion was 25.1 per cent for the Congestion Charge rising to 28.3 per cent in 2021. For ULEZ, the proportion was 25 per cent in 2019 to 32.3 per cent in 2021. This demonstrates the need to maintain the penalty charge at a suitable level to ensure it remains an effective deterrent.</p> <p>The proposal to remove the annual £10 Auto Pay registration fee per vehicle will also enable customers to set up an Auto Pay account free-of-charge. Payment would be taken automatically when their vehicle is detected in the zone and they would not be at risk of forgetting to pay the charge or receiving a PCN.</p>
G3	C332	The PCN should be means tested / dependent on income	151	151	2	Individuals only get a PCN when they do not pay the charge when required to do so, i.e. when the vehicle is not compliant or not exempt / registered for a 100 per cent discount. Only drivers that fail to pay the charge would be impacted by the increase in the PCN.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						The proposal to remove the annual £10 Auto Pay registration fee per vehicle will also enable customers to set up an Auto Pay account free-of-charge. Payment would be taken automatically when their vehicle is detected in the zone and they would not be at risk of forgetting to pay the charge or receiving a PCN.
G4	C333	<p>Other comments about the PCN</p> <p>We received 221 other comments about the PCN</p> <p>Comments included:</p> <ul style="list-style-type: none"> - PCN should not be charged for first contravention - PCN should be variable e.g. higher for repeat offenders, higher for some vehicles 	218	217	7	<p><u>Our response to 'PCN should not be charged for first contravention / PCN should be variable e.g. higher for repeat offenders, higher for some vehicles'</u></p> <p>A tiered PCN structure where multiple contraventions are charged more would be complex to implement and problematic for PCNs issued to hired or leased vehicles, or where vehicles have been sold.</p> <p><u>Our response to 'Payment period should be extended for first offence'</u></p> <p>See response A22.</p> <p><u>Our response to 'Drivers should be able to check if they have entered the zone before receiving a PCN'</u></p> <p>Charging zones are clearly signposted and drivers can check whether their destination</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<ul style="list-style-type: none"> - Payment period should be extended for first offence - Drivers should be able to check if they have entered the zone before receiving a PCN 				<p>is within the zone online using the postcode checker or downloadable maps: https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/ulez-where-and-when</p> <p>The proposal to remove the annual £10 Auto Pay registration fee per vehicle will also enable customers to set up an Auto Pay account free-of-charge. Payment would be taken automatically when their vehicle is detected in the zone and they would not be at risk of forgetting to pay the charge or receiving a PCN.</p>

Other stakeholder comments

- 5.8.2. We have noted these additional comments from stakeholders that are not included in the tables above.
- 5.8.3. LB Camden stated that they would like to see increasingly higher rates proportionate to the emissions size of the vehicle.
Our response: *For consistency and to minimise complexity we recommend that the PCN level remain the same for all non-compliant vehicles.*
- 5.8.4. Campaign for Better Transport said that the PCN levels (and vehicle emissions standards) should be increased regularly.
Our response: *Any future change to PCN levels would be subject to consultation.*

5.9. Auto Pay administration fee for ULEZ, LEZ and Congestion Charge

5.9.1. Table 45 provides a summary of the comments that were received around the £10 Auto Pay annual registration fee for the ULEZ, the LEZ and Congestion Charge (Proposal 2).

Table 45: Responses to comments made about the Auto Pay administration fee

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
H1	C350	Support the removal of the Auto Pay administration fee	309	309	28	We have noted these comments.
H2	C351	Oppose the removal of the Auto Pay administration fee	59	58	1	<p>The benefit for customers using Auto Pay is that it removes the risk of customers being issued with a PCN for non-payment if their registered vehicle is driven in the zone during charging hours and they forget to pay the charge.</p> <p>The proposed expansion of the ULEZ London-wide means there are likely to be higher numbers of customers paying charges in London. Removing the annual per vehicle registration fee for Auto Pay is likely to support these customers by allowing them to avoid getting a PCN by signing up to Auto Pay for free.</p> <p>The proposal also ensures there is no cost differential between paying the daily charge</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						not via Auto Pay and paying via Auto Pay. This helps to incentivise a convenient payment channel and allows customers to benefit from automated billing.
H3	C352	Other comments about the Auto Pay administration fee We received 51 other comments about the Auto Pay administration fee Comments and suggestions included: - Remove the Auto Pay fee sooner	45	45	6	<u>Our response to 'Remove Auto Pay fee sooner'</u> The proposal is to make the change to the Auto Pay registration fee in January 2023. This is to allow time for analysis of responses to this consultation, preparation of this report to inform the Mayor in making a decision, and implementation of the change if the proposal is taken forward.

Other stakeholder comments

5.9.2. We have noted these additional comments from stakeholders that are not included in the tables above.

5.9.3. LB Hounslow asked for consideration of digital exclusion on the ability to register for Auto Pay. **Our response:** *Drivers will continue to be able to pay up to 90 days in advance or up to midnight on the third day following the journey via TfL's website, via the free official TfL Pay to drive app or by telephone.*

5.10. Privacy considerations and use of ANPR enforcement cameras

5.10.1. Table 46 provides a summary of the comments that were received around privacy and the use of ANPR cameras to enforce the London-wide ULEZ scheme.

Table 46: Responses to comments made about privacy and ANPR

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
I1	C370	Concerns about data collection by ANPR (e.g. data privacy and personal data being collected and used)	5103	377	6	<p>The draft Data Protection Impact Assessment (DPIA) conducted for this proposal considered the additions to the Automatic Number Plate Recognition (ANPR) camera infrastructure that would be required to allow the enforcement of the new, further extended boundary area (anticipated to be in the region of 2,750 additional cameras), the back office/systems and infrastructure testing, additional volumes of personal data requiring processing, awareness campaign activities and the potential for camera sharing.</p> <p>The draft DPIA outlines how TfL will manage and process data associated with the proposal and comply with data protection legislation. It includes steps that will be taken to protect data and reduce risks and ensure that data is securely held</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						and only used for its intended purposes. The DPIA has been updated to take account of the privacy and data protection-related responses to this consultation (Appendix N of this report).
I2	C371	No concerns about data collection by ANPR	28	28	6	We have noted these comments.
I3	C372	Concerns about the enforcement of the ULEZ using ANPR / concerns about loopholes and ways to avoid the charge	105	105	0	<p>All ANPR cameras are manually checked for accurate reads by an operator before they are commissioned for live enforcement. There is also requirement for ongoing sampling of cameras throughout their lifecycle to ensure accuracy is maintained. The cameras are tested to ensure that they work accurately in varying weather and light conditions.</p> <p>TfL's ANPR cameras have an accuracy read rate of 95 per cent. In addition, ANPR data and images issued for enforcement purposes are subject to a number of validations before a Penalty Charge Notice (PCN) is issued. This includes a manual check to ensure that the make, model and colour of the vehicle matches DVLA records and helps to reduce the risk of a PCN being</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
						issued as a result of illegal activity such as cloned plates being used.
I4	C373	<p>Other comments about data collection by ANPR</p> <p>We received 33 other comments about data collection by ANPR</p> <p>Comments and suggestions included:</p> <ul style="list-style-type: none"> - Concerns about accuracy of ANPR / data collected - Should be using ANPR for other enforcement purposes (e.g. insurance) - Criticism that cameras are positioned to 'catch out' 	29	29	4	<p><u>Our response to 'Concerns about accuracy of ANPR / data collected'</u></p> <p>See response I3.</p> <p><u>Our response to 'Should be using ANPR for other enforcement purposes (e.g. insurance)'</u></p> <p>TfL is not permitted to do this and has no statutory powers to enforce against criminal offences such as failing to have insurance, which is the remit of the police. This limitation on the purposes for which TfL can legitimately use ANPR cameras also protects the public from 'function creep' and unauthorised use of the cameras for purposes never originally intended.</p> <p><u>Our response to 'Criticism that cameras are positioned to 'catch out' motorists at poorly designed junctions'</u></p> <p>In order to meet the data minimisation obligations in the UK GDPR, TfL uses the minimum possible numbers of ANPR cameras in order enforce all its Road User Charging schemes, including ULEZ. The</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholders)	Our response
		motorists at poorly designed junctions - ANPR cameras are visually intrusive				numbers and location of the cameras are subject to regular review to ensure they continue to meet this requirement, balanced against the need for effective enforcement. <u>Our response to 'ANPR cameras are visually intrusive'</u> We have noted these comments.

Other stakeholder comments

5.10.2. We have noted these additional comments from stakeholders that are not included in the tables above.

5.10.3. Sian Berry AM objected to any routine and continuous sharing of personal data with the Metropolitan Police Service. Hillingdon Friends of the Earth also raised concerns about this issue.

5.10.4. **Our response:** *Any sharing by TfL of ANPR cameras with the MPS (so they may use the data for the prevention and detection of crime) is enabled by a Mayoral Delegation giving TfL the powers to do so.⁸¹ The MPS consider that access to data from TfL ANPR cameras provides them with a capability to tackle crime in London that is otherwise not available. Existing camera sharing arrangements have been the subject of Data Protection Impact Assessments by TfL and the MPS. The Mayoral Delegation requires that the sharing of any additional ANPR cameras is dependent on the completion by the MPS of, '...one or more privacy and equalities impact assessments to demonstrate that such access is proportionate and necessary.'*

⁸¹ <https://www.london.gov.uk/decisions/md1439-delegation-transport-london-tfl-grant-metropolitan-police-service-mps-direct-access> & <https://www.london.gov.uk/decisions/md2977-delegation-tfl-grant-anprc-data-access-mps>

- 5.10.5. The Office of Biometrics and Surveillance Camera Commissioner (OBSCC) responded to the consultation stating that while it was supportive of the aims to improve air quality any extension of ANPR functions is not justified and that extending the use of the role of ANPR beyond its initial purpose (i.e. enforcing vehicle emissions standards) causes further concerns over its legitimacy. The BSCC expressed concerns that there are general issues around the lack of statutory footing for ANPR, as well as concerns around proportionality and who gets access to the data. The BSCC also highlighted the importance of complying with the Surveillance Camera Code⁸² where local authorities are using ANPR to enforce Clean Air Zones.
- 5.10.6. ***Our response:*** *TfL has used ANPR cameras for road user charging purposes since 2003, firstly for the Congestion Charge, then from 2008 for the Low Emission Zone, and from 2019 for the Ultra Low Emission Zone. The ULEZ (including the proposed expansion to outer London) is a road user charging scheme established by law following public and stakeholder consultation under s295 and Schedule 23 of the GLA Act 1999, to reduce harmful air pollutants to legal levels. The use of ANPR cameras to enforce an expanded ULEZ is consistent with this and does not represent a new purpose.*
- 5.10.7. *TfL’s use of ANPR cameras for road user charging schemes is recognised in law for enforcement purposes, under regulations dating from 2001 – and an ANPR camera is a “prescribed device” under the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001/ 2313 (as amended). Ensuring that the use of ANPR cameras remains proportionate is one of the key privacy considerations included within the draft DPIA that TfL has conducted for this expansion proposal, and measures will be taken to ensure that the number (and locations) of cameras are the minimum possible for effective enforcement of an expanded ULEZ. TfL is also extremely mindful of the importance of purpose limitation and third-party access to ANPR camera data and images. Any data sharing is in accordance with our statutory powers as well as being compliant with the UK GDPR and Data Protection Act 2018.*
- 5.10.8. *In respect of the Surveillance Camera Code, TfL will ensure due regard is given to this in line with its voluntary commitment to comply with the Code. The principles of the Code have been considered through the draft DPIA. (TfL is not one of the local authorities or law enforcement bodies legally obliged to have regard to the Code under the Protection of Freedoms Act 2012.)*
- 5.10.9. *TfL met with the OBSCC subsequent to its response to the consultation and clarified the basis for TfL’s use of ANPR for the enforcement of road user charging schemes (including the current Ultra Low Emission Zone). The discussion also included*

⁸² <https://www.gov.uk/government/publications/update-to-surveillance-camera-code>

the measures in place to prevent the possibility of ‘function creep’. No further concerns were raised about TfL’s use of ANPR for the purpose of enforcing ULEZ.

5.11. Integrated Impact Assessment

5.11.1. Table 47 provides a summary of the comments that were received about the ULEZ Scheme IIA, which covered the impacts of the London-wide ULEZ scheme proposals as a whole (Proposals 1 to 3 as relevant to the ULEZ – see Appendix C of this report) and the Congestion Charge and Low Emission Zone impact assessment which covered Proposals 2 to 4 regarding the Congestion Charge and Low Emission Zone (Appendix M of this report).

Table 47: Responses to comments made about the ULEZ Scheme IIA and Congestion Charge and Low Emission Zone IIA

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
J1	C410	<p>Comment about the integrated impact assessments (IIAs) carried out for the consultation (general comments)</p> <p>These included:</p> <ul style="list-style-type: none"> - Requesting a cost-benefit analysis of the proposals - Concerns around the impact ratings 	65	65	34	<p><u>Our response to ‘Requesting a cost-benefit analysis of the proposals’</u></p> <p>The benefits and impacts of the proposed scheme are set out in the ULEZ Scheme IIA including a monetised health benefit. The cost of the scheme based on current assumptions is estimated at c. £159.5m. This includes costs of signage, detection and enforcement infrastructure and systems, marketing, project overheads and risk. We are expecting to generate an incremental net operating surplus of c.£200m with a range +/- c.50 per cent in the first full year of operation.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>assigned to impacts</p> <ul style="list-style-type: none"> - Impacts outside Greater London area should have been assessed - Cumulative impacts with other interventions should be considered 				<p>All revenue from London’s road user charging schemes that is not spent on implementation or operational costs must by law be used to facilitate the delivery of the MTS, which includes improving public transport and making enhancements for people walking and cycling.</p> <p><u>Our response to ‘Concerns around the impact ratings assigned to impacts’</u></p> <p>Each of the four assessments (Economic, Health, Equality and Environment) identify impacts against the relevant IIA objectives as short term (year 1, 2023, of operation) and medium term (from year 2, 2024, to year 4, 2026). Long-term was considered not applicable on the assumption that the Mayor is investigating how TfL could replace ULEZ and other schemes with a single, integrated road user charging scheme within this timeframe. Also, in the longer term, it is expected that there would be almost total compliance with the scheme. In addition to duration, impacts were determined against two assessment parameters: breadth (scale and distribution of positive and negative impacts) and sensitivity (e.g. of people,</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>environmental assets or economic sectors to identified impacts). The impact rating was assessed taking account of mitigation measures committed to by TfL, such as the exemptions, discounts and reimbursements, as originally proposed in the consultation materials. Full details can be found in in section 3.2.1.1 of the ULEZ Scheme IIA.</p> <p><u>Our response to ‘Impacts outside Greater London area should have been assessed’</u></p> <p>The geographical scope of individual impact assessments varies depending on the nature of the impact and range of data available for the assessment. This is outlined in the individual method statements in Appendix B of the ULEZ Scheme IIA (Appendix C of this report). The geographical scope of the economic, health and equality assessments is Greater London, although impacts on people travelling from outside Greater London into the proposed expanded ULEZ are considered in these assessments. The geographical scope of the environment assessment includes the area covered by TfL strategic transport models that are within</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>the London Atmospheric Emissions Inventory which includes Greater London as well as areas outside Greater London up to the M25 motorway.</p> <p><u>Our response to 'Cumulative impacts with other interventions should be considered'</u></p> <p>The ULEZ Scheme IIA considered the likelihood of cumulative impacts on the environment, economy or people from other road user charging schemes (in operation or with formal approval to proceed) in combination with the proposed ULEZ expansion London-wide. The following schemes were considered: Congestion Charge; existing ULEZ; Low Emission Zone; the Silvertown and Blackwall Tunnels user charge; and the Heathrow drop off charge. The IIA concluded it is not considered that any cumulative impacts are likely to result from the implementation of the proposed scheme alongside other existing or planned road user charging schemes.</p>

Other stakeholder comments

- 5.11.2. We have noted these additional comments from stakeholders that are not included in the tables above.
- 5.11.3. LB Hillingdon stated that the IIA is not fit for purpose, is not underpinned by correct, relevant or up to date information and relies on assumptions that have been generated on the back of opaque or missing evidence, and therefore does not meet the objectives for the relevant legislative component parts and does not provide a rational or sound basis on which to make a positive determination.
- 5.11.4. ***Our response:*** *We commissioned independent consultants, Jacobs, to carry out the IIA. The evidence underpinning the IIA (including evidence found in the baseline report) contains the most up to date information available. The assessment is informed by TfL's package of strategic models, including our travel demand model for London (MoTiON), which includes our London highway assignment model (LoHAM) and compares the situation with and without the proposed scheme. For the IIA, MoTiON has a base year of 2016 and a reference (future) year of 2023 and observed data for 2019 is also used to inform the assessment where relevant. The impacts presented in the IIA are based on a scenario that assumes travel behaviour has broadly returned to a pre-pandemic situation and a central forecast for compliance with ULEZ standards is achieved. This is reasonable as traffic levels have quickly and broadly returned to pre-pandemic levels, unlike public transport which is still suppressed. Further work has been undertaken to assess the impacts of the proposals in an uncertain future using our Hybrid Forecast scenario, more information is available in Appendix B of the consultation document (Appendix A of this report).*
- 5.11.5. *As part of the IIA scoping process, a range of stakeholders were invited to workshops where the proposed IIA methodology and objectives, alongside the proposed scheme, were shared and discussed. LB Hillingdon attended one of these workshops and provided feedback which fed into the IIA assessment. During the workshop, LB Hillingdon raised concerns about boundary impacts being felt by Uxbridge town centre, the risk that businesses may relocate from Hillingdon to outside the GLA, and the proximity to Heathrow which employs many Hillingdon residents. These concerns informed the scope of the assessment and the development of mitigation measures for any identified impacts (see response B23 regarding concerns about boundary impacts and risk of businesses relocating). LB Hillingdon also highlighted during the IIA workshop, the need to support disabled people and people on low incomes. In response to this feedback, the proposed scheme was amended so that proposals consulted on included extending the existing grace period exemptions (during which an exemption applies) that apply to disabled or disabled passenger tax class vehicles and wheelchair accessible TfL licenced private hire vehicles fulfilling a private hire booking for two years, from October 2025 to October 2027. The IIA also*

identified that any new scrappage scheme should continue to target low-income Londoners and people in receipt of non-means tested disability benefits and TfL should work with disability groups to raise awareness and provide targeted assistance with applications where needed. These views have also informed the development of scrappage proposals. See section 6.1.

- 5.11.6. LB Harrow commented that committed mitigations listed in the IIA do not cover all the moderate negative impacts and some listed do not mitigate Harrow's circumstances. **Our response:** *Throughout the development of the proposed scheme, and specifically informed by IIA stakeholder engagement, a wide range of potential mitigation measures have been considered by TfL for all impacts identified by the IIA. We welcome further engagement with LB Harrow to discuss this further.*
- 5.11.7. Spelthorne BC expressed concern regarding the evidence base used in the IIA, noting the level of detail for non-GLA boroughs regarding economic, social and environmental impacts was poor. The council also noted that no measures are identified that mitigate impacts for non-GLA boroughs. Similarly, Guildford BC questioned the validity of the IIA results due to the very high-level assessment that has taken place. **Our response:** *We have modelled the impact of the proposed ULEZ expansion to the LAEI area.⁸³ This area comprises Greater London as well as the area within the M25 but outside of the Greater London boundary. This means that some non-GLA local authorities, such as Spelthorne BC, are included within the scope of the environment assessment. TfL's ability to mitigate impacts is limited to the GLA area, however, we welcome further engagement with Spelthorne to discuss the specific issues raised within their stakeholder response and we can provide further information where possible. In some cases, only small parts of neighbouring non-GLA local authorities, such as Guildford BC, may be within the LAEI area and so the data and analysis reported in the IIA apply to only these areas rather than the non-GLA authority as a whole.*
- 5.11.8. Natural England provided a 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 Special Areas of Conservation (SAC). 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). **Our response:** *See Section 5.24 of this report (Other considerations – Habitat Regulation Assessment).*

⁸³ The boundary of the LAEI area is defined in Appendix B of the ULEZ Scheme IIA (Appendix C of this report)

- 5.11.9. LB Barking & Dagenham questioned the figures provided on the number of compliant vehicles and Heathrow Strategic Planning Group suggested that the proportion of vehicles that are non-compliant may be significantly higher than that modelled by TfL. **Our response:** *Forecast compliance rates for 2023 with the proposed changes are based on work undertaken as part of on-going preparation of the LAEI, which focuses on 2019, 2025 and 2030. Compliance rates are based on the fleet compositions that are prepared as part of the LAEI, which include information on age and Euro standards, alongside fuel type and vehicle type across London. This information is initially derived from cross referencing anonymised ANPR camera observations in London with the DVLA record of vehicle information, alongside vehicle kilometre estimates in London. In this way the different types and ages of vehicles along with correlated Euro standards can be determined. This method has been used in the LAEI 2016, and again for the LAEI 2019 which includes recent information across 2019, 2020 and 2021. This allows us to represent changes in the fleet over time, for example observed reductions in pre-Euro 6 diesel vehicles can be seen, alongside increasing proportions of electric vehicles. To forecast the fleet compositions we use information on existing pathways of Euro standards which increase most rapidly when a new Euro standard is introduced, and rate of update reduces over time towards 100 per cent. In addition, work undertaken by Element Energy for the LAEI 2019 forecasts (still in progress) alongside GLA carbon projections has been used to estimate the increasing proportion of electric and plug-in vehicles in 2023. Together the overall compliance rate by vehicle type in 2023 can be determined, and then this data is adjusted based on the uplift that is forecast from the TfL ULEZ vehicle response tool. Compliance rates are then used to estimate the volumes of non-compliant vehicles that would be affected by London-wide ULEZ. This assumes that proportions of compliant and non-compliant vehicles based on the existing camera network are suitable to estimate unique vehicles, although changes to the camera network will increase the density of observations over time.*
- 5.11.10. Heathrow Strategic Planning Group called for further place-based research to be undertaken on the impacts of the scheme on specific geographies within the expanded zone, particularly the Heathrow functional economic area. The Heathrow Area Transport Forum (HATF) expressed concern that no assessment had been undertaken on the users of non-compliant vehicles and if they have protected characteristics. They requested further assessment of the impact on low-income groups employed around Heathrow Airport and additional assessment of the Heathrow economic area which was identified as being impacted in the IIA. **Our response:** *The IIA did consider impacts related to Heathrow airport, currently no further economic assessment is planned but TfL welcomes further engagement on this. A summary of the impacts identified for protected characteristic groups is available in the ULEZ Scheme IIA (Appendix C of this report). The IIA highlights where an impact on a particular protected characteristic group might be experienced by a user of a non-compliant vehicle.*

5.11.11. Transport for All were disappointed that the IIA did not contain suggestions to modify proposals to address issues identified relating to the NHS Reimbursement Scheme, the grace period exemption for disabled-tax class vehicles, and the scrappage scheme. **Our response:** *We have proposed further mitigation to support disabled people, including widening eligibility for the disabled benefits grace period. For further information on these proposals can be found in Section 6.1.*

5.11.12. The National Motorcycle Council were disappointed the IIA considered motorcycles in the same context as private cars. They noted the IIA did not differentiate the impacts on users of motorcycles versus those with private cars. **Our response:** *The current data and models available do not distinguish between the behavioural choices by people who use motorcycles and people who use cars and they are therefore considered together.*

Comments on shaping the future of road user charging

5.12. General comments

5.12.1. Several overarching and general comments were made by respondents on their views on the appropriateness of the policy of road user charging. Table 48 outlines the general comments made.

5.12.2. As we are not consulting on any specific road user charging scheme at this stage, these comments have been noted. This work is at a formative stage. Comments received will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.

Table 48 Responses to general comments

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
K1	C580	Support having road user charging schemes / they are	616	600	44	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		needed (general comments)				
K2	C581	Oppose having road user charging schemes (general comments)	3234	3234	8	We have noted these comments.
K3	C582	Road user charging schemes are not necessary	779	779	5	<p>We are facing three major challenges in London:</p> <ul style="list-style-type: none"> - While we have seen significant progress in reducing harmful air pollution over the past decade, we know that we need to go further to protect human health - It has become clear that we are facing a climate emergency, and that the impacts of extreme weather can affect us all - We have also seen traffic congestion return as London returns to business as usual after the pandemic with costs to the economy and our quality of life

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>Reducing traffic with a comprehensive strategy that includes road user charging would help us to address these challenges:</p> <ul style="list-style-type: none"> - Vehicle emissions increase as vehicle kilometres increase. Furthermore, non-exhaust particulate emissions from tyre and brake wear are also related to vehicle kilometres. - The Mayor has commissioned analysis to identify possible pathways to net zero carbon.⁸⁴ This set out four scenarios representing different levels of decarbonisation ambition. In response to this, the Mayor stated his preferred pathway (<i>Accelerated Green</i>).⁸⁵ In order to meet the target of getting to net zero carbon in London by 2030 under this scenario, car vehicle kilometres need to reduce by at least 27 per cent. - Excess traffic is the biggest contributor to traffic congestion. Reducing traffic relieves pressure on

⁸⁴ https://www.london.gov.uk/sites/default/files/nz2030_element_energy_final.pdf

⁸⁵ https://www.london.gov.uk/sites/default/files/london_net_zero_2030_-_an_updated_pathway_-_gla_response_1.pdf

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>the road network where space is constrained.</p> <p>Traffic reduction can help us to deliver other policies in the MTS by improving conditions for walking and cycling, reducing road danger, alleviating noise pollution, reducing community severance, and supporting local town centres and the wider economy.</p>
K4	C583	Road user charging schemes are a waste of resources / money / time	179	179	0	<p>See response K3.</p> <p>We always seek to deliver the infrastructure needed to operate our road user charging schemes in the most cost-effective way possible.</p>
K5	C584	Stop targeting / penalising motorists	1606	1606	3	<p>The overarching objective of the Mayor's Transport Strategy is that 80 per cent of all journeys in London should be made by walking, cycling or using public transport by 2041. To deliver this, investment has been made to improve the environment and reduce road danger for people walking, cycling and using public transport throughout London.</p> <p>Reducing traffic with a comprehensive strategy that includes road user charging would support this by helping us to address</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>the triple challenges of toxic air pollution, the climate emergency, and traffic congestion. It could also improve conditions for active travel, reduce road danger, reduce noise and severance and support local economies and the wider economy.</p> <p>People and businesses who have no choice but to drive, e.g., for delivery and servicing trips, would benefit from the reduced traffic resulting from this approach. A future scheme could enable more reliable journeys for these essential trips, with less delay and the additional costs associated with this.</p>
K6	C585	Future charging schemes need to be fair (general comments)	921	921	11	We have noted these comments.
K7	C586	Future charging schemes need to be simple / easy to understand and apply (general comments)	164	164	24	We have noted these comments.
K8	C587	Find alternative ways in which to	411	411	1	Experts have found that London will need a new kind of road user charging system by the end of the decade, alongside other

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		charge (e.g. fuel tax)				<p>measures, to achieve net zero carbon by 2030 and address air pollution and traffic congestion. This would enable all existing road user charges, such as the Congestion Charge and ULEZ, to be replaced by a single scheme. The Mayor has asked TfL to start exploring how this concept could be developed, while acknowledging that it is still many years away from being ready to implement such a scheme.</p> <p>Road user charging schemes are a tool to influence travel behaviour. They can act as a deterrent to using a vehicle in certain locations at the busiest times of day or in vehicles that do not meet required emissions standards. Through the design of the scheme, they can be targeted to achieve specific outcomes such as reducing traffic or emissions.</p>
K9	C588	Concerns / doubts the motives of charging schemes are to achieve stated aims / they are just another tax / money-making	2905	2905	8	All revenue from London's road user charging schemes that is not spent on implementation or operational costs must by law be used to facilitate the delivery of the MTS, which includes improving public transport and making enhancements for people walking and cycling.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		schemes / concerns expressed that revenue raised from road user charging schemes will not be used to improve transport infrastructure				
K10	C589	Technology should be used to provide solutions to congestion/air quality/climate emergency	21	21	2	Tackling the triple challenges of toxic air pollution, the climate emergency and traffic congestion requires a package of measures across multiple sectors. This will include harnessing the potential of new technologies, but must also include other measures as set out in the Mayor's preferred pathway to net zero carbon by 2030. ⁸⁶
K11	C590	Action is needed at a global level to reduce emissions/address air quality/climate emergency	15	15	4	Action to reduce emissions can be taken at all levels of government, and London is a member of the C40 Cities network of nearly 100 cities collaborating to deliver the action needed to confront the climate crisis. Furthermore, we continue to learn and share best-practice through our membership of

⁸⁶ [https://www.london.gov.uk/sites/default/files/london_net_zero_2030 - an updated pathway - gla response 1.pdf](https://www.london.gov.uk/sites/default/files/london_net_zero_2030_-_an_updated_pathway_-_gla_response_1.pdf)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						national and international benchmarking groups.
K12	C591	Other charges/costs of driving should be reduced/removed (e.g. road tax, fuel duty, VED)	108	108	2	<p>We have noted these comments.</p> <p>Fuel duty and VED are set by government and used to raise revenue for the Exchequer.</p> <p>London has historically not retained revenues from VED; it is collected by the Driver and Vehicle Licensing Agency (DVLA) and retained by central government. Since 2020, part of VED has been used to establish a new National Roads Fund, however TfL has very limited access to this, meaning options to undertake critical repairs and maintenance are highly constrained.</p>

Other stakeholder comments

5.12.3. We have noted these additional comments from stakeholders that are not included in the tables above.

5.12.4. The London Assembly Transport Committee stated that any proposals should include where the funding generated by these schemes will be invested, and asked TfL to provide a clear assessment of costs and benefits for any future scheme alongside any future consultation.

- 5.12.5. Siân Berry AM expressed disappointment that this has not been engaged on until now despite proposals put forward by Assembly Members.
- 5.12.6. LB Barnet suggested that the burden of transport related taxation should be considered as a whole, and that the Mayor should work with other metropolitan cities on this.
- 5.12.7. Tandridge District Council asked that a coordinated approach is taken with National Highways and counties neighbouring London.
- 5.12.8. Campaign for Better Transport felt that a distance-based road user charging scheme in London should be pitched as a potential pilot for a national scheme. The group also endorsed the scheme outlined in Centre for London's Green Light report which advocates replacing existing road user charging schemes with a single scheme that charges drivers on the basis of the distance driven, the type of vehicle and how polluting it is, and the available transport alternatives.
- 5.12.9. Sustrans also endorsed the scheme outlined in Centre for London's report and suggested that a new scheme should be co-designed with a large group of Londoners representative of the full diversity of London. They also suggested consideration of whether smaller areas can be used for trials.
- 5.12.10. The RAC stated that revenue raised from a new pay per mile scheme should be solely or partially reinvested into the road network. They also encouraged engagement between TfL, the DVLA and other relevant organisations to understand how mileage would be tracked, recorded and reported accurately. ***Our response: See response A11.***
- 5.12.11. Motorcycle Action Group London asked why motorcycles are not specifically referenced, stating that they are more environmentally friendly compared to other forms of motor transport. British Motorcyclists Federation stated that the advantages of motorcycling must be considered for the scheme to be fair.
- 5.12.12. Logistics UK, Association for International Express Sector, and Heathrow Operators Committee and Heathrow Airports Consultative Committee suggested that the London Lorry Control Scheme be considered within the same framework.

5.13. Operation of future charging schemes

5.13.1. Table 49 outlines comments made in relation to the operation of a potential future road user charging scheme. (Potential operational details / scheme design were not proposed or discussed in the consultation materials).

5.13.2. As we are not consulting on any specific road user charging scheme at this stage, these comments have been noted. This work is at a formative stage. Comments received will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.

Table 49 Responses to comments made about operation of a future scheme

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
L1	C600	Charging schemes should be in effect / operation 24/7 / all 24 hours of the day	21	21	0	We have noted these comments.
L2	C601	Charging schemes should be in effect during specific times of the day / not all 24 hours of the day	104	104	1	We have noted these comments.
L3	C602	Charging schemes should be in effect / operation all days of	4	4	0	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		the week (weekdays and weekends)				
L4	C603	Charging schemes should only be in effect during weekdays / weekends should not be included in the charging scheme	39	39	1	We have noted these comments.
L5	C604	Other comments / suggestions about when charging schemes should be implemented / in effect We received 115 other comments / suggestions about when charging schemes should be implemented / in effect which we have noted.	111	111	4	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>Suggestions included:</p> <ul style="list-style-type: none"> - Charging should be phased in slowly - Charging should not be implemented until there has been more time to upgrade vehicles. 				

Other stakeholder comments

5.13.3. We have noted these additional comments from stakeholders that are not included in the tables above.

5.13.4. Siân Berry AM suggested that the charge should be flexible to vary the per-km cost of driving on a day-by-day basis, such as days with high pollution levels, or for particular locations where events are taking place.

5.13.5. LB Hackney and LB Lambeth suggested timescales for implementation were not ambitious enough. LB Hackney also suggested their borough could be the location of a pilot scheme.

- 5.13.6. LB Redbridge would like a future scheme to address school peak hour traffic and consider the impact of variable charging on town centres.
- 5.13.7. LB Bexley stated that a scheme should not be implemented until enhanced public transport connectivity and reliability has been achieved in outer London.
- 5.13.8. Campaign for Better Transport recommended that a pilot scheme should be in place by 2025.
- 5.13.9. Clean Air London called for a scheme to be introduced sooner.
- 5.13.10. London Chamber of Commerce and Industry and Royal Mail suggested that enough time should be allowed for a fully developed and tested scheme to be introduced, as planned investment cycles cannot be easily shifted and introducing too early could disincentivise some fleet operators.

5.14. Boundary for future charging schemes

- 5.14.1. Table 50 outlines comments made in relation to the boundary of a potential future road user charging scheme. (Potential future boundaries were not proposed or discussed in the consultation materials).
- 5.14.2. As we are not consulting on any specific road user charging scheme at this stage, these comments have been noted. This work is at a formative stage. Comments received will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.

Table 50 Responses to comments made about boundary of a future scheme

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
M1	C622	The boundary for charging schemes should only be central and inner London	617	617	2	We have noted these comments.
M2	C623	The boundary for charging schemes should cover all of London	25	25	0	We have noted these comments.
M3	C626	Other comments / suggestions about the boundary for charging schemes We received 434 other comments / suggestions about the boundary for charging schemes which we have noted. Suggestions included: - The need for a wider scheme	430	430	4	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<ul style="list-style-type: none"> at the national level - Specific areas that should be excluded from the charging area or treated differently (e.g. outer east and south east London, Heathrow and surrounding areas) - Charging should be based on zones / concentric rings around London. 				

Other stakeholder comments

5.14.3. We have noted these additional comments from stakeholders that are not included in the tables above.

5.14.4. LB Hounslow suggested that a future scheme must acknowledge impacts on the M25.

- 5.14.5. Zipcar suggested consideration would be needed for car clubs operating on both sides of the London boundary.
- 5.14.6. Several business stakeholders highlighted the importance of reducing complexity for freight operators and consequently the need to align closely with national policy relating to any future national charging scheme.
- 5.14.7. Transport for the South East and Transport East both stressed that TfL should prepare an extensive evidence base in support of any future scheme and test a range of options so the benefits and impacts can be understood and mitigated. More specifically, Transport for the South East commented that introducing a London only scheme could have significant adverse impacts on traffic patterns around the edge of London that would need to be identified, mitigated and managed.

5.15. Charging

- 5.15.1. Table 51 outlines comments made in relation to the charges in a potential future road user charging scheme. (Potential charge levels were not proposed or discussed in the consultation materials).
- 5.15.2. As we are not consulting on any specific road user charging scheme at this stage, these comments have been noted. This work is at a formative stage. Comments received will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.

Table 51 Responses to comments made about charges in a future scheme

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
N1	C640	Include all vehicles in charging regardless of	201	200	1	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		emissions / Euro standards				
N2	C641	Should have travel allowances (e.g. how many miles or how often a vehicle can be used within a period before it would be charged)	299	299	6	We have noted these comments.
N3	C643	Charging should be based on vehicle size / weight/ type / safety of vehicle	482	482	9	We have noted these comments.
N4	C644	Charging should be based on emissions (e.g. worst polluters pay more)	624	620	24	We have noted these comments.
N5	C646	Charges should be based on miles travelled	614	610	15	We have noted these comments.
N6	C647	Charges should be based on time of day (e.g. higher during peak times)	171	171	14	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		and lower during off-peak)				
N7	C648	Charges should be based on where the vehicle is being driven in London / charges should be higher for travelling in areas with higher congestion / poorer air quality	248	248	14	We have noted these comments.
N8	C649	Charges should be based on the availability of walking / cycling / public transport alternatives	234	234	12	We have noted these comments.
N9	C650	Charges should be pay-as-you-go / should be a flat fee per journey	109	109	3	We have noted these comments.
N10	C652	Charges should be higher for businesses /	120	120	0	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		delivery companies / vehicles				
N11	C653	Charges should be based on frequency of vehicle use	202	202	1	We have noted these comments.
N12	C654	Charges should disincentivise short journeys (e.g. less than 5 miles)	255	253	6	We have noted these comments.
N13	C655	Charge should be similar / lower than public transport prices	12	12	0	We have noted these comments.
N14	C656	Charge should be higher than public transport prices	34	34	0	We have noted these comments.
N15	C658	Charges should be a daily charge / pay once per day (i.e. only pay once per day regardless of how many journeys made)	56	56	3	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
N16	C659	Other road users should be charged (e.g. cyclists)	190	190	0	<p>TfL only has the power to establish and operate road user charging schemes for imposing charges in respect of the keeping or use of motor vehicles and therefore cannot include cycles within the scope of the scheme/ charge.</p> <p>Furthermore, Policy 1 of the Mayor's Transport Strategy (MTS) states the aim for 80 per cent of trips in London to be made by walking, cycling or public transport. Disincentivising these modes through additional charges would be detrimental to this aim.</p>
N17	C657	<p>Other suggestions for charge amounts / structure</p> <p>We received 610 other suggestions for charge amounts / structure which we have noted.</p> <p>Suggestions included:</p> <ul style="list-style-type: none"> - Consideration of journey purpose 	602	602	8	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		in charging levels - Cap the price for residents				

Other stakeholder comments

5.15.3. We have noted these additional comments from stakeholders that are not included in the tables above.

5.15.4. LB Barnet suggested the parameters of the scheme could start out simple with additional elements added over time as people adjust and technology becomes available.

5.15.5. In addition to the parameters outlined in Table 51, the Faculty of Public Health and Transport & Health Science Group suggested a scheme could also include a charge per vehicle hour, an enhanced charge for vehicle using tolled lanes, a lower rate for vehicles with higher occupancy, and an enhanced charge for travel above the speed limit where this has not led to prosecution.

5.15.6. The RAC emphasised that a new scheme should be simple and straightforward, asking that initially the scheme is only introduced in two areas, to align it with existing schemes, with a charge per mile where the only variable is vehicle emissions. They suggested expanding the scheme to consider types of roads and time of day would be complex and confusing.

5.15.7. Wandsworth Community Transport proposed a higher charge for second cars and that motorists should be allowed 50 free trips per year.

5.15.8. Showmen's Guild of Great Britain suggested the charge should be a single annual payment.

- 5.15.9. Zipcar suggested consideration will be needed on whether the user or operator bears the burden of charging, as car club operators would need significant lead-in time to develop technology to implement this.
- 5.15.10. Logistics UK and UPS argued that a scheme's charging structure to deter cars should not automatically apply to freight in the same way. Logistics UK noted deliveries and collections are timed to meet customer needs, whereas UPS highlighted that they are often timed to connect to an international network, and therefore using time of day to determine a charge could be detrimental to London's businesses.
- 5.15.11. London Chamber of Commerce and Industry suggested that if time of day is included then there should be exemptions for businesses that cannot avoid driving at peak times.
- 5.15.12. Heathrow Operators Committee and Heathrow Airports Consultative Committee suggested that journeys taking place in peak hours should not be penalised as often this is driven by customer demand and the need to make best utilisation of capacity.
- 5.15.13. Air Quality Brentford suggested that electric vehicles are charged for the amount of time they are plugged in, which would in turn ensure people do not occupy chargers for extended periods of time.
- 5.15.14. ClientEarth expressed concern that considering the distance driven could encourage short journeys that could be otherwise done by alternative means.
- 5.15.15. Inclusion London suggested that if income is to be a key component, then disability benefits such as Personal Independence Payments and Disability Living Allowance should be removed from income calculations.

5.16. Public transport

- 5.16.1. Table 52 outlines comments made in relation to public transport.

Table 52 Responses to comments made in relation to public transport

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
O1	C670	Need to invest / improve public transport (general comments) (e.g. more frequent, more routes, availability and accessibility in areas etc)	1602	1601	10	<p>Tackling the triple challenges of toxic air pollution, the climate emergency and traffic congestion requires a package of measures across multiple sectors.</p> <p>The Mayor has set out his preferred pathway to net zero carbon – <i>Accelerated Green</i>.⁸⁷ In order to meet the target of getting to net zero carbon in London by 2030 under this scenario, car kilometres need to reduce by at least 27 per cent. This would require road user charging as part of a wider policy package including, for example, traffic and parking control measures, road space reallocation, public transport improvements, freight consolidation, co-location of services to reduce the need to travel, retro-fitting buildings to be more energy efficient, and the installation of heat pumps.</p> <p>We are investing in public transport and delivering improvements across the network. See response F1.</p>

⁸⁷ [https://www.london.gov.uk/sites/default/files/london_net_zero_2030 - an updated pathway - gla response 1.pdf](https://www.london.gov.uk/sites/default/files/london_net_zero_2030_-_an_updated_pathway_-_gla_response_1.pdf)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						We are not consulting on any specific future road user charging scheme at this stage. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts. If a road user charging scheme were taken forward, this would be accompanied by a programme of complementary measures to mitigate the impact of the charge on those groups facing the greatest negative impact and ensure the policy goals of the scheme are achieved. Improving public transport, particularly in outer London, would form part of these complementary measures.
O2	C671	Need to improve public transport in central / inner London	16	16	0	We have noted these comments.
O3	C672	Need to improve public transport in outer London	199	199	0	We have noted these comments.
O4	C673	Need to encourage / incentivise more use of public transport	930	930	1	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		(e.g. should make it cheaper)				

Other stakeholder comments

5.16.2. We have noted these additional comments from stakeholders that are not included in the tables above.

5.16.3. Kent Sevens suggested removing buses from the road network.

5.17. Active travel and health

5.17.1. Table 53 outlines comments made in relation to active travel and health.

Table 53 Responses to comments made about active travel and health

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
P1	C690	Need to invest / improve active travel (general comments)	171	170	5	Tackling the triple challenges of toxic air pollution, the climate emergency and traffic congestion requires a package of measures across multiple sectors.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>The Mayor has set out his preferred pathway to net zero carbon – <i>Accelerated Green</i>.⁸⁸ In order to meet the target of getting to net zero carbon in London by 2030 under this scenario, car kilometres need to reduce by at least 27 per cent. This would require road user charging as part of a wider policy package including traffic and parking control measures, road space reallocation, public transport improvements, freight consolidation, co-location of services to reduce the need to travel, retro-fitting buildings to be more energy efficient, and the installation of heat pumps.</p> <p>We are investing in walking, cycling and safety measures. See response F3. If a road user charging scheme were taken forward, this would be accompanied by a programme of complementary measures to mitigate the impact of the charge on those groups facing the greatest negative impact and ensure the policy goals of the scheme are achieved. Improving infrastructure and the environment for walking and cycling,</p>

⁸⁸ [https://www.london.gov.uk/sites/default/files/london_net_zero_2030 - an updated pathway - gla response 1.pdf](https://www.london.gov.uk/sites/default/files/london_net_zero_2030_-_an_updated_pathway_-_gla_response_1.pdf)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						particularly in outer London, would form part of these complementary measures.
P2	C691	Suggest improving cycling infrastructure	424	422	2	See response F11.
P3	C692	Suggest improving the safety of cyclists	248	248	1	See response F12.
P4	C693	Suggest improving walking infrastructure	178	176	3	See response F13.
P5	C694	Suggest improving safety of pedestrians	136	136	1	See response F14.
P6	C695	Need to encourage / incentivise more use of active travel	131	131	2	See response F4.
P7	C696	Need to improve physical activity / obesity	33	33	0	We have noted these comments.
P8	C697	Need to improve / protect mental health	9	9	0	We have noted these comments.

Other stakeholder comments

5.17.2. We have noted these additional comments from stakeholders that are not included in the tables above.

5.17.3. LB Lambeth called for equivalent funding to be provided to boroughs to be invested in measures to support residents switching to sustainable transport options, including new innovations like mobility credit systems and supporting shared mobility services.

5.17.4. Friends of Capital Transport Campaign suggested that as well as improving air quality, TfL should prioritise bus and walking accessibility for people with disabilities.

5.18. Other suggestions to reduce congestion, improve air quality and tackle the climate emergency

5.18.1. Table 54 outlines comments made in relation to other suggestions to reduce congestion, improve air quality and tackle the climate emergency.

Table 54 Responses to comments about other suggestions to reduce congestion, improve air quality and tackle the climate emergency

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
Q1	C710	Should ban non-compliant / most polluting vehicles instead of charging them	236	229	1	Only boroughs as traffic authorities for their roads can ban the use of vehicles (as they have done with Low Traffic Neighbourhoods) via individual Traffic Regulation Orders (TROs). TfL can only do the same regarding the TfL Road Network (TLRN) for which it is the traffic authority.
Q2	C711	Need to encourage / incentivise more car	81	79	5	Car clubs can play an important role in assisting Londoners who want to move

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		clubs / vehicle sharing				<p>away from private car ownership. Proposal 19 of the Mayor's Transport Strategy supports the provision of car clubs when paired with a reduction in the availability of private parking. Car club provision should be considered on a case-by-case basis to ensure it contributes to reduced levels of overall car use. We continue to work with the car club industry on ways to support Londoners to reduce their car use.</p> <p>If a new road user charging scheme were taken forward, this would be accompanied by a programme of complementary measures to mitigate the impact of the new scheme on those groups facing the greatest negative impact and ensure the policy goals of the scheme are achieved. Car clubs, particularly in outer London, could be considered as part of these complementary measures.</p>
Q3	C712	Needs to be more investment in electric vehicles / EV infrastructure	290	290	1	See response F6.
Q4	C713	Need to encourage / incentivise more use	252	252	0	See response F7.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		/ switching to electric vehicles				
Q5	C714	Need more schemes to deter driving / promote use of alternatives	569	554	11	See response O1, response P1, response Q2 and response Q6.
Q6	C715	Need to reduce the amount of parking available in London / increase the cost of parking / reduce the accessibility of parking	104	104	5	<p>The current London Plan embeds active, efficient and sustainable travel in London through promoting high-density mixed-use sustainable development with associated public transport investment and a restrictive approach to car parking provision. We continue to shape local plan policies across London so that they are better aligned with this approach, for example by ensuring policies require car parking provision to be reduced in new developments. Every car free home delivered in London brings down car ownership and generates sustainable travel. We will continue to work with boroughs to achieve the appropriate car parking provision in London as local plans make their way through the planning system.</p> <p>Most on-street parking is on borough highway and we will continue to work with</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>boroughs on managing demand for kerbside access. On our own road network, we have worked with the LB Lambeth to conduct a trial of paid for parking on a section of the TLRN. While the trial was disrupted by the pandemic, we are now seeking to build on this by exploring further ways of managing demand for kerbside access on the TLRN.</p> <p>If a road user charging scheme were taken forward, this would be accompanied by a programme of complementary measures to mitigate the impact of the charge on those groups facing the greatest negative impact and ensure the policy goals of the scheme are achieved. Parking measures could be considered as part of this wider package.</p>
Q7	C716	Need more focus on improving existing road infrastructure (e.g. expanding capacity, improvements to junctions, routes)	528	527	7	<p>See response A16.</p> <p>An efficient street network is crucial for London. Individuals and businesses rely on the capital's streets to get them where they need to go and to bring them the things they need, such as deliveries. Streets are also the places where London's public life plays out, forming 80 per cent of London's public space. Creating an efficient street network, with less congestion, reliable movement of</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						people and goods, and which supports vibrant town centres and places, is therefore fundamental to London's economic performance and quality of life.
Q8	C717	Needs to be more encouragement / investment in other transport related schemes / areas to improve air quality / congestion / environment (e.g. LTNs, traffic calming, enforcement of speed limits)	156	156	1	See response O1 and response P1.
Q9	C718	Need to remove / make changes to other traffic measures / schemes that cause congestion / air quality (e.g. cycle lanes, bus lanes, LTNs)	1617	1617	8	See response A16.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
Q10	C719	Need to target other sources of air pollution (e.g. airports, new developments, wood burners)	550	550	3	See response F10.
Q11	C720	Need to improve green space (e.g. plant more trees)	223	221	4	<p>Street trees can provide shade, shelter and cooling, helping to reduce the urban heat island effect and enabling everyone to use the streets. Proposal 43 of the Mayor's Transport Strategy supports retaining existing trees and planting new ones on the Transport for London Road Network (TLRN) and borough roads. Proposal 5.1.1.e of the London Environment Strategy states that the Mayor will develop programmes and deliver projects, including a major tree planting programme, to ensure that London's urban forest is maintained and expanded.</p> <p>Since 2016 the Mayor has funded the planting of over 430,000 trees across London, including two major woodland creation projects, creating an additional 85 hectares of new accessible green space in the Green Belt. In July 2022, the Mayor</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						announced a further £3.1 million tree planting package.
Q12	C721	Suggestions for other areas to focus on that are higher priority than congestion / air quality / climate emergency (e.g. crime, reducing property development)	310	310	0	We have noted these comments.
Q13	C722	Need more funding / investment in outer boroughs not just central London	35	35	1	<p>The overarching objective of the MTS is that 80 per cent of all journeys in London should be made by walking, cycling or using public transport by 2041. To deliver this, investment has been made to improve the environment and reduce road danger for people walking, cycling and using public transport throughout London.</p> <p>A key objective of the MTS is to make it easier for those travelling in outer London to shift towards walking, cycling and public transport. We are continuing to invest in these modes to support this.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>On our rail networks, we opened the Elizabeth Line in May 2022, and an extension of the London Overground to Barking Riverside in July 2022.</p> <p>Our Bus Action Plan highlights the vital role bus travel will have in achieving this in outer London, and sets out how we will deliver the high-quality bus service London needs.⁸⁹</p> <p>We also continue to work with outer London boroughs to deliver walking and cycling schemes, including cycleways, LTNs and School Streets.</p> <p>If a new road user charging scheme were taken forward, this would be accompanied by a programme of complementary measures to mitigate the impact of the new scheme on those groups facing the greatest negative impact and ensure the policy goals of the scheme are achieved. Investment in sustainable transport options in outer London would form part of these complementary measures.</p>

⁸⁹ Bus Action Plan: <https://content.tfl.gov.uk/tfl-mts-update-14-july-2022-acc.pdf>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
Q14	C723	Stop Silvertown tunnel project	98	92	7	The Silvertown Tunnel is vital to supporting sustainable development in east London by addressing the chronic issues of congestion, poor reliability, and a lack of resilience at the Blackwall Tunnel and the need for much improved cross-river bus connectivity. The Development Consent Order which grants the powers to build and operate the Silvertown Tunnel includes a Charging Policy by which we must set and vary the user charges at the Blackwall and Silvertown Tunnels. This will include pricing of trips in order to secure the congestion relief, air quality and public transport benefits of the scheme. This will be supported by a new cross-river bus network which will be delivered as part of the scheme.
Q15	C725	Need to target / reduce noise pollution (e.g. noise from traffic)	53	53	0	Although noise is part of a vibrant city, excessive noise can damage people's health and contribute towards a range of physical and mental health problems, disturb sleep and affect people's hearing, communication and learning. Reducing the noise impacts of motor traffic will directly benefit health, improve the

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>ambience of street environments and encourage active travel and human interaction. Proposal 48 of the Mayor's Transport Strategy sets out how we can reduce the number of Londoners exposed to excessive noise levels from road transport. This includes reducing traffic volumes by encouraging mode shift from travelling by car to walking, cycling and using public transport.</p>
Q16	C724	<p>Other suggestion for improving congestion / air quality / climate emergency</p> <p>We received 1129 other comments about suggestions for improving congestion / air quality / climate emergency which we have noted.</p> <p>Suggestions included:</p>	1125	1124	4	<p><u>Our response to 'Restrictions on the use of certain classes of vehicles (e.g. HGVs, SUVs)'</u></p> <p>See response Q1.</p> <p>TfL and London Councils already deter the use of certain classes of vehicle in specific areas / on specific streets through existing TfL charging schemes and the London Lorry Control Scheme (LLCS).</p> <p><u>Our response to 'Re-timing or re-moding freight trips'</u></p> <p>Re-timing and re-moding freight trips are part of our overall strategy for freight and servicing, as set out in the Mayor's</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<ul style="list-style-type: none"> - Restrictions on the use of certain classes of vehicles (e.g. HGVs, SUVs) - Re-timing or re-moding freight trips - Measures to reduce the impact of the school run - Introduction of park and ride facilities - Stop new housing developments / reduce London's population 				<p>Transport Strategy and TfL's Freight and Servicing Action Plan.⁹⁰</p> <p><u>Our response to 'Measures to reduce the impact of the school run'</u></p> <p>We continue to work with boroughs to support sustainable school travel. This includes the provision of concessionary fares for children and other measures such as School Streets. See response O1 and response P1.</p> <p><u>Our response to 'Introduction of park and ride facilities'</u></p> <p>While park-and-ride facilities can help to expand the reach of mass transit in some contexts, over 96 per cent of Londoners already live within 400 metres of a bus stop, and 90 per cent live within 400 metres of a high frequency service. Therefore the potential for park-and-ride to expand public transport connectivity in London is likely to be limited.</p> <p><u>Our response to 'Stop new housing developments / reduce London's population'</u></p>

⁹⁰ <https://content.tfl.gov.uk/freight-servicing-action-plan.pdf>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						The London Plan ⁹¹ identifies that London needs 66,000 new homes each year for at least twenty years. The Mayor's Transport Strategy ⁹² sets out how the transport network can support this using the principles of Good Growth (good access to public transport; high-density, mixed-use developments; people choose to walk and cycle; car-free and car-lite places; inclusive, accessible design; carbon-free travel; efficient freight). Applying the transport principles of Good Growth will mean that, as London grows, a greater proportion of people will live in locations that are well connected to employment and other opportunities by walking, cycling or using public transport.

Other stakeholder comments

5.18.2. We have noted these additional comments from stakeholders that are not included in the tables above.

⁹¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

⁹² <https://tfl.gov.uk/corporate/about-tfl/the-mayors-transport-strategy>

- 5.18.3. Queen’s Park Area Residents Association suggested further work is needed to understand why people travel by car at peak times.
- 5.18.4. The Hammersmith Society suggested central London congestion could be addressed by removing excess PHVs and replacing cycle lanes with bus lanes.
- 5.18.5. Kent Sevens suggested TfL should initiate ways to encourage motorcycling.
- 5.18.6. Zipcar suggested an updated car club strategy is needed.
- 5.18.7. Be People Smart suggested introducing car pooling lanes.
- 5.18.8. Hounslow Borough Friends of the Earth would like to see TfL or GLA influence on parking charge structures.

5.19. Comments made in relation to other charging schemes

5.19.1. Table 55 outlines comments made in relation to other charging schemes.

Table 55: Responses to comments made in relation to other charging schemes

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
R1	C740	Suggest other changes to the Congestion Charge scheme	100	100	4	We have noted these comments.
R2	C741	Suggest other changes to the LEZ	12	12	0	We have noted these comments.

5.20. Discounts and exemptions

5.20.1. Table 56 outlines comments made in relation to discounts and exemptions in a potential future road user charging scheme. (Potential discounts and exemptions were not proposed or discussed in the consultation materials).

5.20.2. As we are not consulting on any specific road user charging scheme at this stage, these comments have been noted. This work is at a formative stage. Comments received will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.

Table 56 Responses to comments about discounts and exemptions in a future scheme

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
S1	C750	Charging schemes should include discounts / exemptions (general comments)	45	45	0	We have noted these comments.
S2	C751	Charging schemes should not include discounts / exemptions (general comments)	43	43	1	We have noted these comments.
S3	C752	London residents should not have to pay charges / should be exempt (e.g. should only	276	276	0	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		charge vehicles registered outside of GLA)				
S4	C753	NHS / key workers should receive discounts / exemptions	123	123	1	We have noted these comments.
S5	C755	NHS patients should receive discounts / reimbursements / exemptions	29	29	0	We have noted these comments.
S6	C757	Should be discounts / exemptions for taxis / black cabs	15	15	0	We have noted these comments.
S7	C758	Should be no discounts / exemptions for taxis / black cabs	36	36	0	We have noted these comments.
S8	C759	Should be discounts / exemptions for Private Hire Vehicles (PHVs)	6	6	0	We have noted these comments.
S9	C760	Should be no discounts / exemptions for	18	18	0	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		Private Hire Vehicles (PHVs)				
S10	C761	Should be discounts / exemptions for tradespeople	92	92	0	We have noted these comments.
S11	C762	Should be discounts / exemptions for delivery vehicles	60	60	0	We have noted these comments.
S12	C763	Should be discounts / exemptions for small / local businesses / sole traders	63	63	0	We have noted these comments.
S13	C764	Should be discounts / exemptions for charities	10	10	2	We have noted these comments.
S14	C765	Should be discounts / exemptions for businesses (general comments)	48	48	0	We have noted these comments.
S15	C766	Should be discounts / exemptions for disabled people	111	110	3	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
S16	C767	Should be discounts / exemptions for elderly / vulnerable people	107	107	0	We have noted these comments.
S17	C769	Should be discounts / exemptions for those with informal family care arrangements	42	42	0	We have noted these comments.
S18	C770	Should be discounts / exemptions for those on low incomes / financially struggling / charging should take household income into account (e.g. means testing)	262	262	8	We have noted these comments.
S19	C771	Should be discounts / exemptions for vehicle-sharing / car-sharing / charges should be higher for vehicles with single occupants	73	73	0	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
S20	C774	Should be discounts / exemptions for classic / historical vehicles	66	66	1	We have noted these comments.
S21	C772	Other named groups / vehicles should receive exemptions / discounts We received 167 comments suggesting other groups / vehicles should receive exemptions / discounts. These included: <ul style="list-style-type: none"> - Teachers - People who commute for work - Shift workers - Emergency service workers 	165	165	3	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<ul style="list-style-type: none"> - Airport workers - People on middle incomes - Carers - People who work with animals (e.g. vets) - Families - Visitors - Motorcycles - Motor homes - Less polluting vehicles - Hybrid vehicles - Electric vehicles - Car clubs - Local trips - Essential business trips 				

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
S22	C773	<p>Other comments about discounts and exemptions</p> <p>We received 175 other comments about discounts and exemptions which we have noted.</p> <p>Suggestions included:</p> <ul style="list-style-type: none"> - Electric vehicles should not be exempt - There should be discounts / exemptions for workers at Heathrow Airport - There should be discounts / exemptions for people who are entitled to 	172	172	3	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		disability living allowance but are not eligible for a blue badge				

Other stakeholder comments

5.20.3. We have noted these additional comments from stakeholders that are not included in the tables above.

5.20.4. The Faculty of Public Health suggested some exemptions could be introduced on a temporary basis for a transition period after scheme launch.

5.20.5. British Vehicle Rental and Leasing Association suggested shared mobility providers are treated differently from private car owners to acknowledge the critical role that they play in reducing reliance on the private car and they are encouraged through suitable exemptions/ discounts.

5.20.6. Uber Boat by Thames Clippers proposed an exemption for workers travelling within the scheme boundaries at unsocial hours to get to work.

5.21. Impacts

5.21.1. The following section summarises comments received around the potential impacts of future road user charging. (This topic was not a scheme proposal). For ease of reading, it is split into two tables with associated stakeholder commentary at the end of the section. The first table contains comments about the financial impact of future road user charging. The second table contains comments about the social impacts of future road user charging.

5.21.2. As we are not consulting on any specific road user charging scheme at this stage, these comments have been noted. This work is at a formative stage. Comments received will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.

Financial impacts

5.21.3. Table 57 outlines comments made in relation to the financial impact of a future charging scheme.

Table 57 Responses to comments about the financial impact of a future charging scheme

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
T1	C790	Concerns that charges will be unfair on those who have to travel to / from / for work	665	665	3	<p>In developing proposals for a potential future scheme, impacts on different groups, including those with protected characteristics, would be taken into account. An Integrated Impact Assessment (IIA) to assess the likely impacts of a proposed scheme would be undertaken if proposals are taken forward.</p> <p>The IIA would consider and document the findings of the following assessment processes to provide a proportionate and integrated assessment:</p> <ul style="list-style-type: none"> - Environmental Assessment (EA) - Health Impact Assessment (HIA)

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<ul style="list-style-type: none"> - Equality Impact Assessment (EQIA) - Economic and Business Impact Assessment (EBIA) <p>If a decision was then made to implement a scheme, this would be accompanied by a programme of complementary measures to mitigate the impact of the charge on those groups facing the greatest negative impact and ensure the policy goals of the scheme are achieved.</p>
T2	C791	Will have detrimental impacts on London / London's economy / businesses	495	495	1	See response T1.
T3	C792	Will have a detrimental impact on my business/livelihood	75	75	0	See response T1.
T4	C793	Will have detrimental impacts on small businesses	151	151	0	See response T1.
T5	C794	Concerns that costs of charging schemes will be	131	131	2	See response T1.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		passed onto residents/customers from businesses/ services				
T6	C795	Funding / financial support should be provided to support the upgrading / replacing of vehicles	315	315	2	See response T1.
T7	C796	Concerns about ability to pay charges / upgrade vehicles to be compliant with future charging schemes / concerns that existing vehicles being devalued	1044	1044	1	See response T1.
T8	C797	Concerns that businesses will relocate outside of London to avoid paying charges	54	54	0	See response T1.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
T9	C798	Concerns that residents will relocate outside of London to avoid paying charges	257	257	0	See response T1.
T10	C799	Other comments about financial impacts of future road charging schemes We received 283 other comments about financial impacts of future road user charging schemes which we have noted. Comments included: - Road user charging should be viewed in the context of other costs of driving, potentially as an alternative to	281	281	1	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		vehicle excise duty or fuel duty				

Social impacts

5.21.4. Table 58 outlines comments made in relation to the social impact of a future charging scheme.

Table 58 Responses to comments about the social impact of a future charging scheme

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
T11	C810	Having and using a car is a necessity because of needs / cannot use other transport modes	981	981	2	<p>Reducing traffic with a comprehensive strategy that includes road user charging would help us to address the triple challenges of toxic air pollution, the climate emergency, and traffic congestion. It could also improve conditions for active travel, improve bus speeds and reliability, reduce road danger, reduce noise and severance and support local economies and the wider economy.</p> <p>Alongside this, we need to continue to improve alternatives to car travel, including</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>walking, cycling, public transport and car clubs, so that more Londoners choose to use them. See response O1 and response P1. Discounts and exemptions from any new scheme would also be considered where appropriate, as is the case in existing schemes.</p> <p>People and businesses who have no choice but to drive, e.g. for delivery and servicing trips, would benefit from the reduced traffic resulting from this approach. A future scheme could enable more reliable journeys for these essential trips, with less delay and the additional costs associated with this.</p>
T12	C811	Public Transport provisions are poor / not a viable alternative	915	915	3	See response O1.
T13	C812	Future charging schemes need to consider the cost of living / issues at the time impacting on finances	967	967	4	We have noted these comments.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
T14	C813	Concerns charging schemes will have detrimental impacts on people's lives	491	491	1	In developing proposals for a potential future scheme, impacts on different groups, including those with protected characteristics, will be taken into account. An Integrated Impact Assessment to assess the impacts of a proposed scheme will be undertaken if a scheme is taken forward for consultation and consideration by the Mayor. There would also be a full public and stakeholder consultation on detailed scheme proposals. If a decision was then made to implement a new scheme, this would be accompanied by a programme of complementary measures to mitigate the impact of the new scheme on those groups facing the greatest negative impact and ensure the policy goals of the scheme are achieved.
T15	C814	Concerns charging schemes will push people into / towards poverty	300	300	4	See response T14.
T16	C815	Concerns charging schemes will force people out of	120	120	0	See response T14.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		employment / to change employment				
T17	C816	Concerns charging schemes will negatively impact those living outside of Greater London	59	59	0	See response T14.
T18	C817	Concerns charging schemes will have negative impacts on mental health	131	131	1	See response T14.
T19	C818	Concerns about data collection by ANPR / other data privacy concerns	136	136	0	If any proposals are brought forward in future, we will ensure throughout that it can meet its objectives with the minimum possible collection and use of personal data. We would also consider the role that privacy enhancing technologies can play in this. Some potential elements, for instance those relating to distance and/or route travelled and the time a journey is made, will require particular consideration and privacy risks will be mitigated by developing a scheme in accordance with the 'privacy by design' and 'data minimisation' requirements of the UK GDPR. A Data Protection Impact

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						Assessment (DPIA) would also be completed.
T20	C819	Will negatively impact on social / leisure activities / visiting friends and family/concerns about social isolation	318	318	1	See response T14.
T21	C820	Other comments about social impacts We received 144 other comments about social impacts which we have noted. Comments included: <ul style="list-style-type: none"> - Costs may force people to move out of London - Only the rich will be able to afford to drive 	143	143	1	See response T14.

Other stakeholder comments

5.21.5. We have noted these additional comments from stakeholders that are not included in the tables above.

5.21.6. The London Assembly Transport Committee suggested that Londoners are involved in the development of any future scheme, particularly those with protected characteristics, health concerns, a defined need to drive, or low incomes.

5.21.7. Sutton Christian Centre asked that consideration be given to people who live just outside of London and drive in for work.

Other comments and considerations

5.22. Other comments

5.22.1. Table 59 outlines other comments made in relation to all scheme proposals consulted on, and also in relation to any potential future road user charging scheme (not a scheme proposal). These comments have been noted.

Table 59 Other comments

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
U1	C860	Negative comments / criticism of the Mayor	11423	6694	20	We have noted these comments.
U2	C861	Positive comments / support of the Mayor	64	64	1	We have noted these comments.
U3	C862	Unfair to expand the ULEZ after the Mayor previously	104	104	2	The Mayor's manifesto states that TfL will monitor all existing road-charging schemes on his behalf to ensure they continue to

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		said this would not happen				<p>bring the maximum benefits of improved air quality and reduced congestion, and that he will identify where further action is needed to eradicate hotspots for air pollution.</p> <p>Evidence continues to be published highlighting the impacts of exposure to air pollution – even at low levels. We always need to evolve and adapt our policies to make sure we address the current challenges.</p> <p>In 2019, air pollution contributed to the premature deaths of around 4,000 Londoners showing that we must go further and faster to safeguard human health. The greatest number of those premature deaths were in outer London boroughs, mainly due to the higher proportion of older people in these areas, who are more vulnerable to the impacts of air pollution.</p> <p>Furthermore, the World Health Organization (WHO) has recently updated their guidelines, recommending lower thresholds for the main air pollutants to reflect the growing weight of evidence of the health risks of exposure to pollution – even at low levels.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
U4	C863	Negative comments / criticism of government	1927	1926	6	We have noted these comments.
U5	C864	Positive comments / support of government	39	39	0	We have noted these comments.
U6	C865	Negative comments / criticism of TfL	2439	2439	16	We have noted these comments.
U7	C866	Positive comments / support or TfL	40	35	3	We have noted these comments.
U8	C867	Comment / comparison to other country / city	1221	1207	14	We have noted these comments.
U9	C868	Confusion / uncertainty whether vehicle/s will be impacted and charged by ULEZ	230	230	0	An online tool for people to find out if their vehicle meets the emissions and safety standards required to drive in London, or if they need to pay a daily charge, is available at https://tfl.gov.uk/modes/driving/check-your-vehicle/ .

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
U10	C880	<p>Other comments (relevant but do not fit into code frame⁹³)</p> <p>We received 2,320 other relevant comments.</p> <p>Comments included:</p> <ul style="list-style-type: none"> - Concern that compliance standards will be changed later - Tyre wear causes more pollution than exhaust emissions - Negative impacts of proposals will be disproportionately felt by women - Consider the environmental 	2301	2284	45	<p><u>Our response to 'Concern that compliance standards will be changed later'</u></p> <p>We are not consulting on any specific future road user charging scheme at this stage. Any future proposals would be subject to a further public and stakeholder consultation with information on detailed scheme proposals and their impacts.</p> <p><u>Our response to 'Tyre wear causes more pollution than exhaust emissions'</u></p> <p>If PM_{2.5} levels are to be improved, a significant reduction in tyre and brake wear will be needed in addition to a reduction in exhaust emissions. This can be achieved through a reduction in vehicle kilometres by supporting mode shift to walking, cycling and public transport as outlined in the MTS. New technologies, including the use of regenerative braking, also have the potential to reduce emissions.</p>

⁹³ All free-text responses and letters and emails were grouped into themes to allow meaningful analysis. The themes from each question were created by AECOM using the initial set of responses, and these were verified by TfL before full coding began. Where new themes emerged, these were verified before continuing. Comments which did not fit under a theme in the code frame are captured under this code.

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		<p>costs of electric vehicles (e.g. batteries, non-exhaust emissions)</p> <ul style="list-style-type: none"> - Concern about the environmental cost of vehicle scrappage - Call for a referendum on proposals - Concern about women's safety - Difficulty accessing NHS reimbursement scheme - Difficulty using TfL website - Concern about proposed bus service reductions at the 				<p><u>Our response to 'Negative impacts of proposals will be disproportionately felt by women'</u></p> <p>85 per cent of vehicles seen in outer London and 94 per cent of vehicles seen in inner London already meet the ULEZ standards meaning most drivers will not need to pay the daily charge. If proposals are taken forward, cars seen in the new zone are expected to be over 95 per cent compliant by the end of 2023. For vans, compliance is expected to be 91 per cent. Additionally, around half of London households do not own a car.</p> <p>The ULEZ Scheme IIA identified a minor negative impact on women taking children to school in outer London in a non-compliant vehicle. It also reported a minor negative impact on women who rely on services provided by charities and community organisations undertaking activities using non-compliant vans and minibuses within outer London. In addition, the IIA identified a minor negative impact on women who travel by non-compliant private vehicle but cannot afford to upgrade to a compliant vehicle.</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
		same time as this proposal				<p>Women may be reluctant to use public transport due to perceptions of the risk to personal safety, and therefore may travel less. The IIA identified a minor negative impact for women who work for the NHS in lower paid positions who travel by non-compliant private vehicle to access employment in outer London. Where employers do not reimburse care workers for upgrading their vehicle or paying the charge, the IIA identified a moderate negative impact on women serving the outer London area, who rely on using non-compliant vehicles, as a result of the additional cost associated with the scheme. This has the potential to result in stress and anxiety.</p> <p>We have also developed a proposal for a scrappage scheme which will be launched if the Mayor approves ULEZ expansion London-wide. Londoners on low incomes, disabled Londoners, charities and micro businesses will be eligible for the scheme. See section 6.1.</p> <p>Any future proposals to introduce a new road user charging scheme would be</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>subject to further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.</p> <p>We are committed to making our network a place where women and girls can feel and be safe. We have established a Women’s Safety Programme, which is wide-reaching and builds on the ongoing work with our police partners to make our public transport network a hostile environment for offenders.</p> <p><u>Our response to ‘Consider the environmental costs of electric vehicles (e.g. batteries, non-exhaust emissions)’</u></p> <p>While electric vehicles have an important role in reducing emissions, in the long run we will still need to reduce vehicle kilometres, irrespective of alternative drivetrains or fuels. See response Q3.</p> <p><u>Our response to ‘Concern about the environmental cost of vehicle scrappage’</u></p> <p>The impact on scrappage and treatment facilities for the proposed Scheme is estimated to generate an average of an</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>additional 36,600 tonnes per annum in the first few years after implementation.</p> <p>There is a directive which ensures scrappage treatment facilities have a minimum target of 95 per cent recycling and recovery. This legislation is 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><u>Our response to 'Call for a referendum on proposals'</u></p> <p>The GLA Act 1999 (s295 and Schedule 23) states that TfL or any London borough council may establish and operate schemes for imposing charges in respect of the keeping or use of motor vehicles on roads in its area. This power can be used to operate a road user charging scheme, with appropriate charges to deter use of non-compliant vehicles as defined in the scheme.</p> <p>This consultation provided the opportunity for the public and stakeholders to answer questions about Proposals 1 to 4 of the</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>scheme proposals, and 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>This provides the Mayor with the necessary information with which to make a decision using the powers available to him under the GLA Act 1999. A public inquiry is unlikely to elicit any additional information which has not already been stated in consultation responses or identified in the ULEZ Scheme IIA.</p> <p><u>Our response to 'Concern about women's safety'</u></p> <p>TfL is committed to playing its full part in supporting and delivering on the Mayor's Women's Night Safety Charter and strategy to end violence against women and girls in London. This includes establishing a Women's Safety Programme, which is wide-reaching and builds on the ongoing work with police partners to make the public</p>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
						<p>transport network a hostile environment for offenders.</p> <p><u>Our response to 'Difficulty accessing NHS reimbursement scheme'</u></p> <p>Payments are handled directly by the participating NHS Trust. Patients can contact the hospital or coronavirus vaccination centre that treated them directly for further information. We will continue to work with the NHS and relevant charities to help disseminate information about the reimbursement.</p> <p><u>Our response to 'Difficulty using TfL website'</u></p> <p>We have noted these comments.</p> <p><u>Our response to 'Concern about proposed bus service reductions at the same time as this proposal'</u></p> <p>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>

Reference	Code frame reference number	Issue/comment	Times raised (public including organised responses)	Times raised (public excluding organised responses)	Times raised (stakeholder)	Our response
U11	C885	Other out of scope comments	812	806	7	N/A

5.22.2. Table 60 outlines comments made in relation to the consultation. These comments have been noted.

Table 60 Comments relating 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
C890	U12	Positive comments about consultation	28	28	0	We have noted these comments.
C891	U13	Negative comments about consultation (e.g. criticism)	1874	1872	27	TfL's consultations are planned and delivered according to good practice standards and consultation law requirements. The consultation provided the opportunity for the public and stakeholders to answer questions about Proposals 1 to 4 of the scheme proposals, and on shaping the future of road user charging. Further opinions could be expressed within three open textboxes, while it was also

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
						<p>possible to send views on the proposed changes by email or Freepost if people did not wish to respond through the online survey. People could also call our customer services team if they did not have access to digital information.</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' version of the consultation materials and survey was also available.</p> <p>The proposals and survey were also available with British Sign Language videos and audio file formats.</p> <p>We produced a promotional flyer in 18 of the most popular spoken languages across</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
						<p>London to help engage with communities where English is not the first language.</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, Freepost or telephone call.</p> <p>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</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
						issued to all relevant media. Further details are set out in Chapter 3 of this report.
C892	U14	Other comments about consultation	109	109	16	We have noted these comments.
C893	U15	Comment about legally challenging the proposals	38	38	1	We have noted these comments.

Other stakeholder comments

5.22.3. We have noted these additional comments from stakeholders that are not included in the tables above.

5.22.4. GLA Liberal Democrats thought it was a mistake to consult on proposals to expand ULEZ and future road user charging at the same time. **Our response:** *We have noted these comments.*

5.22.5. LB Hounslow were concerned that TfL has not taken sufficient steps to engage with communities for whom English is not a first language. **Our response:** *Translations of our consultation flyer detailing the proposals and how to participate in the consultation were provided in 18 of the most spoken languages in London and were available upon request by either members of the public or stakeholders. Our consultation portal page includes a translation function which allows users to translate the page into over 100 languages. We provided consultation flyers to 820 locations across Greater London, including community centres, libraries and citizens advice centres, and included ‘empty belly’ posters in these bundles.⁹⁴*

⁹⁴ An ‘Empty Belly’ poster includes a large blank space as part of its design. The purpose of this is for the displayer of the poster to add in their own text, for example, advertising local events or translation of proposals. The posters distributed for this consultation included this blank space, consultation title, consultation end date and a QR code linking to the consultation’s webpage. A copy of the poster can be found in Appendix B of this report.

We encouraged these locations to fill the spaces of posters with text in locally spoken languages or details of meetings and notified them that we had translated materials available. Additionally, translations of all consultation materials could be provided upon request. We also conducted a thorough stakeholder mapping exercise to capture as wide an audience as possible. This included several community and faith groups across Greater London. We have noted these comments from LB Hounslow and will incorporate feedback into future consultations.

- 5.22.6. Kent CC, Knockholt Parish Council asked if more detailed maps could be provided / found maps included in consultation materials difficult to read. **Our response:** *We have noted these comments and will incorporate feedback into future consultations.*
- 5.22.7. LB Bexley criticised that the proposals to expand ULEZ were not included in the Mayor's 2021 electoral manifesto, and also criticised the consultation, arguing that the questions did not enable proper examination of the proposals, and that there is no understanding of the social or economic implications of the scheme. **Our response:** *See response U3. In addition to both the manifesto and the MTS stating that the Mayor will keep schemes under review to ensure their ongoing effectiveness, the wider context has changed with new evidence and targets furthering our understanding of the impact of poor air quality and the importance of further action. In September 2021, the World Health Organization (WHO) updated its recommended guidelines for air pollutants reflecting its assessment of the overwhelming evidence of the adverse health impacts of air pollution, even at low levels. We always need to evolve and adapt our policies to make sure we address the current challenges. Air pollution is not, and never was, just a central or inner London problem. In 2019, air pollution contributed to the premature deaths of around 4,000 Londoners showing that we must go further and faster to safeguard human health. The greatest number of those premature deaths were in outer London boroughs, because even though pollution is lower in the outer boroughs, there is a higher proportion of older people in these areas, who are more vulnerable to the impacts of air pollution. We commissioned independent consultants, Jacobs, to carry out an Integrated Impact Assessment for the proposed ULEZ expansion. The evidence underpinning the IIA (including evidence found in the baseline report) contains the most up to date information available. As part of the IIA scoping process, a range of stakeholders (including LB Bexley) were invited to workshops where the proposed IIA methodology and objectives, alongside the proposed scheme, were shared and discussed. The three open text boxes enabled respondents to provide comments on the proposals, both positive and negative as well as the supporting documentation.*
- 5.22.8. Transport for All suggested that there needs to be more communication to disabled people about any future proposals, how disabled people may be affected, and what mitigations are being proposed. This communication should be jargon-free, and information must be made available in a range of alternative formats. **Our response:** *We provided Easy Read versions of*

our consultation materials and consultation survey, which were available from the start of the consultation for all to access. Respondents were welcome to download the Easy Read consultation survey and email or post their completed survey to us. We also provided our consultation materials and survey in a BSL format and audio file format. Respondents were welcome to respond to us via BSL video or audio file if they preferred. Additionally, we provided a consultation phonenumber and textphone service as a way for people to provide their views if they did not want to complete the online survey or send an email or letter. We also conducted a thorough stakeholder mapping exercise to capture as wide an audience as possible. Our stakeholder list included several hundred contacts representing pan-London and local disability and accessibility organisations. These organisations were invited to share their views on the consultation and were encouraged to attend or request meetings to discuss the proposals. During the consultation, we attended meetings with the Deaf and Disabled Londoners Forum, Inclusive Transport Forum and Inclusion London, all of which had attendees from several disability and accessibility organisations across Greater London. Finally, we partnered with Disability Horizons, an online disability community and disability lifestyle publication, on our marketing campaign. Disability Horizons provided an extensive marketing campaign tailored to their audience, encouraging them to participate in the consultation and notifying them of the accessible formats offered. Their marketing included publicising the consultation in their e-newsletters, their digital advertising, online articles and on social media. We have noted these comments from Transport for All and will incorporate feedback into future consultations.

5.22.9. Camden Friends of the Earth expressed disappointment that the conversation on developing a future smart charging scheme had been treated as 'an optional extra' for the consultation. **Our response:** *We have noted these comments.*

5.22.10. Mums for Lungs urged the Mayor to implement a zero-emission zone by 2025 as outlined in the Mayor's Transport Strategy. LB Hackney also commented on the lack of information on zero-emission zones. **Our response:** *We have noted these comments.*

5.23. Representative YouGov poll on London-wide ULEZ

5.23.1. Significant efforts were made when consulting the public and stakeholder organisations to achieve a representative response to the consultation and ensure all voices were heard, as set out in sections 3.2 - 3.4. For the general public and organisations, both London based and nationally, this was an opportunity for those with concerns about the London-wide ULEZ proposals to register their point of view. Respondents to the consultation are therefore self-selecting, and it is likely that these respondents will tend to hold strong opinions. The issues raised in all consultation responses including representations from stakeholders from within and beyond London and organised responses, have been analysed,

considered and responded to. Consultation respondents were not representative of the London population and their responses should not be interpreted as the latest poll of Londoners' opinions on this scheme.

5.23.2. In order to understand the views of a representative sample of Londoners, the GLA commissioned a poll to understand Londoners' views on the proposals, alongside the consultation. The survey was carried out online by YouGov between 15th and 20th July 2022 with 1,245 responses which have been weighted to be representative of all London adults.

5.23.3. The poll question was:

To tackle air pollution in the capital, the Mayor of London and Transport for London are proposing to expand the Ultra Low Emission Zone (ULEZ) London-wide (see map above). The proposed implementation date for this is 29th August 2023. Which, if any of the following comes closest to your view? It should be implemented, but at an earlier date; It should be implemented at the proposed date; It should be implemented but at a later date; It should not be implemented; Don't know.

5.23.4. Results from the poll indicate that just over half of Londoners support the Ultra Low Emission Zone (ULEZ) expansion (51 per cent); which is comprised primarily of people who are keen to see it put into place on the planned implementation date of 29th August 2023 (21 per cent) or earlier (22 per cent). A smaller proportion agree that it should be enacted, but at a later date (eight per cent). Over a quarter of Londoners say that the expansion should not be implemented at all (27 per cent), with a further fifth of Londoners saying that they 'don't know' (22 per cent).

5.23.5. Respondents from inner London are considerably more likely to support the expansion than outer Londoners (61 per cent compared to 46 per cent of outer Londoners) – with half supporting implementation at proposed date or earlier (53 per cent compared to 38 per cent of outer Londoners).

5.23.6. Further details are provided in Appendix L of this report.

5.24. **Other considerations – Habitat Regulation Assessment Screening**

5.24.1. In their formal response to the consultation, Natural England requested the submission of a Habitat Regulation Assessment (HRA) to determine the scheme impacts on ammonia deposition in the Epping Forest Special Area of Conservation (SAC) as part of the revision to the MTS. 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).

- 5.24.2. TfL commissioned Jacobs to undertake a screening assessment pursuant to the Conservation of Habitats and Species Regulations 2017 in response to these comments. 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 sites⁹⁵ at the Lee Valley and South West London Waterbodies.
- 5.24.3. The HRA screening report 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.
- 5.24.4. The full HRA screening report can be found in Appendix K of this report.

⁹⁵ A Ramsar site is a wetland site designated to be of international importance under the Ramsar Convention.

6. Conclusions and recommendations

6.1. Changes proposed as a result of consultation / potential mitigations

6.1.1. As a result of stakeholder feedback around the anticipated impacts of the proposed London-wide ULEZ on disabled Londoners, we have proposed two modifications to the scheme in the form of two new time-limited grace periods, which would operate until 24 October 2027. These are in addition to the current disabled vehicle tax class, disabled passenger vehicle tax class and Wheelchair Accessible Private Hire Vehicles (PHV) exemptions:

- A “Disabled benefits grace period” for recipients of the standard rate mobility component of Personal Independence Payment (PIP)⁹⁶ and certain other specific state benefits; and
- A “Wheelchair Accessible Vehicles grace period” for all wheelchair accessible vehicles.

A Blue Badge grace period, as is operated with the Congestion Charge, was considered as an alternative, but on balance, an approach using disability benefits was considered the best solution. This proposed modification means that anyone who receives benefits that automatically make them eligible for a Blue Badge⁹⁷ will also qualify for this new grace period. Those who may be eligible for a Blue Badge but do not automatically qualify via their benefits may also be covered by this grace period if they meet the above criteria. We consider that using disability benefits criteria offers the best and most consistent approach. In London, we estimate that more people are likely to be eligible under this criteria than the current number of Blue Badge holders⁹⁸. Modifications have been discussed and developed with stakeholders, and additional mitigations have been welcomed.

(As these are not included in the LEZ-ULEZ Variation Order made by TfL any decision to proceed will require its confirmation with modifications by the Mayor.)

Disabled benefits grace period

6.1.2. This provides support to those with mobility issues who are more likely to be reliant on the use of a private vehicle. Recipients of the standard rate mobility component of PIP and certain other specific benefits (below) would be eligible. They would be able to register their own vehicle or their nominated driver’s vehicle with us to receive a 100 per cent discount from the ULEZ until 24 October 2027.

6.1.3. Recipients of the following benefits would also be eligible:

⁹⁶ Adult Disability Payment (ADP) standard rate mobility component recipients (*Scotland only*) would also be eligible.

⁹⁷ <https://www.gov.uk/government/publications/blue-badge-can-i-get-one/can-i-get-a-blue-badge>

⁹⁸ Data from the Department for Work and Pensions in July 2022 showed that 282,520 Londoners claimed benefits which would make them eligible for the new grace period, and data from the Department for Transport published in January 2022 showed that 247,000 Londoners had a Blue Badge.

- Enhanced rate mobility component of PIP;
- Higher rate mobility component of Disability Living Allowance (DLA);
- Enhanced rate mobility component of Adult Disability Payment (ADP);
- Higher rate mobility component of Child Disability Payment;
- War Pensioners' Mobility Supplement; and
- Armed Forces Independence Payment.

6.1.4. Recipients of the above are already eligible for the disabled vehicle tax class and, as such, are automatically eligible for the disabled vehicle tax class exemption grace period. However, some recipients may not have registered for the disabled vehicle tax class with the DVLA. The extension of eligibility to include the above recipients ensures that those who are not registered for the disabled vehicle tax class can apply to receive the same mitigation as standard rate mobility component PIP recipients. This also has the additional benefit of removing a barrier for disabled people as they will not be required to apply for the disabled vehicle tax class in order to benefit from the grace period.

Wheelchair Accessible Vehicles (WAVs) grace period

6.1.5. To give additional support for disabled Londoners, we will enable all wheelchair accessible vehicles, including privately owned wheelchair accessible vehicles, to receive a 100 per cent discount from ULEZ until 24 October 2027. Given the higher cost of replacement vehicles this grace period will provide owners additional time to adapt to ULEZ emissions standards.

New London Vehicle Scrappage Scheme

6.1.6. It is proposed that a new large-scale and targeted vehicle scrappage scheme will be launched if the ULEZ expansion London-wide proceeds. Whilst scrapping of vehicles has an environmental impact in itself, on balance, it is considered the best solution. Consultation responses have highlighted the importance of scrappage as the principal mitigation in response to the potential adverse impacts on individuals and groups identified in the ULEZ Scheme IIA and by consultation responses, as referred to in section 2.5 and Chapter 5.

6.1.7. Scrappage has clear benefits to accelerate vehicle compliance and improve air quality, but some have identified adverse impacts. With the core objectives to address air quality and provide a suitable mitigation for certain impacts, on balance it is considered to be the best solution. The scrappage scheme will be designed, administered and operated through TfL under the Mayoral delegation approved under MD2661. It is envisaged the scheme will be operational from January 2023.

6.1.8. This new scheme will provide scrappage grants and other assistance to help eligible Londoners scrap (i.e. dispose of) or retrofit vehicles that are not compliant with the ULEZ standards thereby removing older, more polluting emission vehicles from London's roads. The scheme will help clean the city's

toxic air by helping successful applicants to use cleaner vehicles or greener and more sustainable forms of transport, including car clubs. The scheme would build on the success of the previous scrappage scheme which operated alongside the supported ULEZ in central London and expansion to inner London. This saw the removal of more than 15,200 older, more polluting non-ULEZ compliant vehicles from London's roads.

6.1.9. The new £110 million scrappage scheme will be initially targeted at supporting people on lower incomes, disabled Londoners, micro businesses and charities to scrap or retrofit their non-compliant vehicles in preparation for the London-wide expansion of the ULEZ.

6.1.10. It is proposed eligibility will initially be limited to Greater London residents and eligible micro businesses and charities based in Greater London.

6.1.11. The key features of the scheme are as follows:

- Scrappage grants for disabled people and Londoners on lower incomes will range from between £1,000 for a motorcycle, £2,000 for a car, and £5,000 for a Wheelchair Accessible Vehicle;
- Successful applicants can also select a mobility credit option (an annual Bus & Tram pass) alongside a reduced scrappage payment, which together will exceed the value of the standard scrappage payment. There will also be an option for two annual Bus & Tram passes alongside a reduced scrappage payment which may be attractive to those who transport others with their vehicle;
- Micro businesses and charities scrapping vans and minibuses would receive grants ranging from £5,000 to £9,500 dependent on their replacement vehicle;
- It is also proposed that there is a new option to retrofit their vehicle to meet the ULEZ standards using their scrappage grant;
- TfL will seek to secure complementary offers from third parties, for those who use the scrappage scheme to support and encourage them to consider alternatives to car ownership. Successful applicants can also opt for an annual Bus & Tram pass alongside a reduced scrappage payment. All buses and trams are wheelchair accessible;
- To reach eligible audiences, we will launch a comprehensive multichannel marketing campaign, including the employment of stakeholder engagement;
- Rigorous accessibility testing will be done on our scrappage webpages, and alternative options for those not able to complete an online application will be available.

6.1.12. We have published a scrappage evaluation report of the previous scrappage scheme.⁹⁹ This has included looking at the scrappage application process, the impact of scrappage and details of the car and motorcycle scrappage scheme survey. Lessons learned from the report have helped us to devise the new scheme. This has included ensuring that the application process is

⁹⁹ <https://tfl.gov.uk/corporate/publications-and-reports/ultra-low-emission-zone>

as straightforward as possible, targeted awareness raising and introducing alternatives to the grant payment to further support mode shift to sustainable modes of transport including working with third-party industry partners to offer a wide range of third-party offers.

- 6.1.13. It is proposed that the GLA provides TfL with £110 million in funding for the purposes of the new scheme (including implementation) to be provided by means of a grant under section 121 of the GLA Act 1999.

6.2. Recommendation (ULEZ expansion)

- 6.2.1. Prior to making his decision about whether or not to confirm the scheme proposals (Proposals 1 to 4) and their two related variation orders (below), with or without modifications, we recommend that the Mayor should consider the whole of this report and other relevant information available to him, including advice from GLA and TfL officers, the contents of the two IIAs and the draft DPIA, the responses to the consultation, together with our considerations, particularly with relation to Chapter 5 of this report, and other relevant matters, considerations and information. He should also consider whether any further consultation, further information or the holding of some form of inquiry is necessary or appropriate prior to his decision to confirm or not confirm the variation order.

- 6.2.2. The relevant variation orders are:

- the *Greater London Low Emission Zone Charging (Variation and Transitional Provisions) Order 2022*, which it is recommended is confirmed by the Mayor with the two modifications (Disabled Benefits and Wheelchair Accessible Vehicles grace period 100 per cent discounts) described above; and
- the *Greater London (Central Zone) Congestion Charging (Variation) Order 2022*, which it is recommended the Mayor confirms without any modifications.

- 6.2.3. If the Mayor considers that no further consultation or the holding of a public inquiry is necessary or appropriate, it is recommended they are confirmed as recommended as above.

6.3. Recommendation (shaping the future of road user charging)

- 6.3.1. The consultation asked for views to shape the future of road user charging in London. As we are not consulting on any specific road user charging scheme at this stage, these comments have been noted. This work is at a formative stage. Comments received will inform future thinking around how such a scheme could be designed and developed. Any proposals which could be developed in the future would be subject to a further public and stakeholder consultation with information provided on detailed scheme proposals and their likely impacts.