

Appendix A: List of stakeholders that responded to the ULEZ consultation

- Air Quality Brentford
- Alliance of British Drivers
- Arriva
- Balfour Beatty
- Bambos Charalambous MP
- Barking and Dagenham and Havering Green Party
- Barnet Green Party
- Better Streets for Enfield
- Bloomsbury Air
- Brentford Chamber of Commerce
- Brentford Community Council
- Brewery Logistics Group
- British Heart Foundation
- British Lung Foundation
- British Motorcyclists Federation
- British Vehicle Rental and Leasing Association (BVRLA)
- Builders Merchants Federation
- Campaign for Better Transport
- Campaign for Better Transport (London Group)
- Campaign to Protect Rural England
- Caroline Pidgeon AM
- Caroline Russell AM
- Chartered Institute of Environmental Health
- Chiswick Liberal Democrats
- Church of England (Diocese of Chelmsford)
- City of London
- CitySprint
- Clean Air for Brent
- Clean Air in London
- ClientEarth
- Cllr David Linnette (London Borough of Richmond)
- Confederation of British Industry (CBI)
- Confederation of Passenger Transport
- Coulsdon & Purley Road User Forum
- Cross River Partnership
- Disabled Motoring UK
- Federation of British Historic Vehicle Clubs
- Federation of Small Businesses
- Forest Hill Society
- Freight Transport Association
- Friends of the Earth
- Gipsy Hill Green Party
- Greenpeace
- Greenwich Conservatives
- Heart of London Business Alliance
- Herne Hill Green Party
- Hertfordshire County Council
- Hounslow and Brentford Friends of the Earth
- Islington Green Party
- Joanne McCartney AM
- John Lewis Partnership
- Kingston Environment Forum
- Lambeth for a Cool Planet
- Lambeth Green Party
- LEVC
- Lewisham Cyclists
- Lewisham Liberal Democrats
- Licensed Taxi Drivers' Association (LTDA)
- Living Streets
- London Assembly Environment Committee
- London Assembly Environment Committee – Conservative group
- London Assembly Environment Committee – UKIP group
- London Borough of Barnet
- London Borough of Brent
- London Borough of Camden
- London Borough of Croydon
- London Borough of Ealing

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- London Borough of Enfield
- London Borough of Hackney
- London Borough of Hammersmith & Fulham
- London Borough of Haringey
- London Borough of Havering
- London Borough of Hounslow
- London Borough of Islington
- London Borough of Lambeth
- London Borough of Lewisham
- London Borough of Newham
- London Borough of Redbridge
- London Borough of Richmond upon Thames
- London Borough of Southwark
- London Borough of Sutton
- London Borough of Waltham Forest
- London Borough of Wandsworth
- London Car Free Day 2018
- London Chamber of Commerce and Industry
- London Councils
- London Cycling Campaign
- London Forum of Amenity and Civic Societies
- London Living Streets
- London Property Alliance
- London Sustainability Exchange
- London Tourist Coach Operators Association
- Make Air Safe and Clean
- Marble Arch London
- Merton Community Groups
- Mortlake with East Sheen Society
- Motorcycle Action Group
- Motorcycle Industry Association
- Musicians' Union
- National Express
- New West End Company
- Port of London Authority
- RAC Foundation
- RAC Motoring Services
- Redbridge Liberal Democrats
- Richmond and Twickenham Friends of the Earth
- Richmond and Twickenham Green Party
- Richmond Heathrow Campaign
- Road Danger Reduction Forum
- Road Haulage Association
- Rotherhithe and Surrey Docks Green Party
- Routemaster Association
- Royal Borough of Kensington and Chelsea
- Royal Borough of Kingston upon Thames
- Royal Borough of Greenwich
- Sian Berry AM
- SMMT
- Southwark Green Party
- Stagecoach London
- Streatham Wells Labour
- Sustainable Merton
- Sustrans
- Sutton and Croydon Green Party
- Team London Bridge
- The Finsbury Forum
- The Kew Society
- The St Marylebone Society
- Thurlow Park Ward Councillors
- Tideway
- Uber
- UPS
- Veolia
- Victoria BID
- Waltham Forest and Redbridge Green Party
- Waltham Forest Conservatives
- Wandsworth Environment Forum
- Wandsworth Green Party
- We Ride London
- Westminster Business Improvement Districts
- Westminster City Council

Appendix B: List of stakeholders invited to respond

- AA
- Abellio
- Abellio West London Ltd t/a Abellio Surrey
- Access in London
- ACFO
- Addison Lee
- Afternoon Tea
- Age UK London
- Airport Bus Express
- Air Quality Consultants
- Alliance of British Drivers
- All-Party Parliamentary Group
- Alzheimer's Society
- Andrew Boff AM
- Andrew Dismore AM
- Andrew Rosindell MP
- Andrew Slaughter MP
- Arriva London
- Arriva The Shires
- Association of British Drivers
- Asthma UK
- AVRO
- Baker Street Quarter
- Bambos Charalambous MP
- Barking & Dagenham Safer Transport Team
- Barnet Community Transport
- Barry Gardiner MP
- BD Auto
- Better Bankside
- Bexley Accessible Transport Scheme (BATS)
- Bexleyheath BID
- Big Bus Tours
- Bob Blackman MP
- Bob Neill MP
- Bob Stewart MP
- Boris Johnson MP
- Brent Community Transport
- Brent Cross
- Brent Safer Transport Team
- Brimsdown Freight Quality Partnership
- British Lung Foundation
- British Motorcyclists Federation
- British Property Federation
- Brixton BID
- Bromley BID
- Bromley Safer Transport Team
- Brookline
- Build UK
- Business Disability Forum
- Buzzlines
- BVRLA
- BYD
- Camden Safer Transport Team
- Camden Town Unlimited
- Campaign for Better Transport
- Canary Wharf Group
- Canary Wharf Management Ltd
- Capita
- car2go
- Carbon Trust
- Caroline Pidgeon AM
- Caroline Russell AM
- Carplus
- Catherine West MP
- CECA
- CEMEX
- Centaur
- Central London Freight Quality Partnership
- Centrepont
- Chalkwell
- Charles Walker MP
- Chauffeur & Executive Association
- Cheapside Business Alliance
- Cheryl Gillan MP

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- Chris Grayling MP
- Chris Philp MP
- Chuka Umunna MP
- City Car Club
- City of London
- City of London Police
- Clarkes of London
- Clean Air in London
- ClientEarth
- Clive Efford MP
- Community Transport Association
- Community Transport Waltham Forest
- Confederation of British Industry (CBI)
- Confederation of Passenger Transport
- Connect
- Considerate Constructors Scheme
- Construction Clients' Group
- Corporation of London
- Crispin Blunt MP
- Croydon Accessible Transport (CAT)
- Croydon BID
- Croydon Safer Transport Team
- CT Plus
- DAF Trucks
- Daimler
- David Evennett MP
- David Gauke MP
- David Kurten AM
- David Lammy MP
- David Warbuton MP
- Dawn Butler MP
- Defra
- Dennis Eagle
- DHL
- Diane Abbott MP
- Disability Rights UK
- DisabledGo
- Disabled Motoring UK
- Disablement Association of Barking and Dagenham (DABD)
- Dominic Raab MP
- DriveNow
- Ealing Broadway BID
- Ealing Community Transport (ECT Charity)
- Ealing Safer Transport Team
- easyBus
- E-Car
- Ed Davey MP
- EEF
- Eleanor Laing MP
- Ellie Reeves MP
- Emily Thornberry MP
- Emissions Analytics
- Emma Dent Coad MP
- Enfield Community Transport (ECT)
- Enfield Safer Transport Team
- Environment Agency
- Environmental Protection UK
- Farringdon and Clerkenwell BID
- Federation of British Historic Vehicle Clubs
- Federation of Small Businesses
- Fiona Twycross AM
- First 702
- Florence Eshalomi AM
- FM Conway
- Ford
- Forest Hill Traders' Association
- Frazer Nash
- Freight Transport Association
- Friends of Capital Transport
- Friends of the Earth
- Gareth Bacon AM
- Gareth Johnson MP
- Gareth Thomas MP
- Ghost Bus Tours

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- GMB
- Go-Ahead London
- Golden Tours
- Go Ultra Low
- Grant Shapps MP
- Greater London Forum for Older People
- Green Alliance
- Green Line (Arriva)
- Greenpeace UK
- Greenwich Safer Transport Team
- Greg Hands MP
- Guide Dogs
- Hackney Community Transport (HCT)
- Hackney Safer Transport Team
- Hammersmith & Fulham Safer Transport Team
- Hammersmith London
- Hampstead BID
- Haringey Safer Transport Team
- Harriet Harman MP
- Harrow Community Transport
- Harrow Safer Transport Team
- Harrow Town Centre
- Hatton Garden
- Havering Community Transport Limited
- Havering Safer Transport Team
- Heart of London Business Alliance
- Heidi Alexander MP
- Helen Hayes MP
- Hertz On Demand
- Hillingdon Community Transport (HCT)
- Hillingdon Safer Transport Team
- Hitachi Capital
- Hounslow Community Transport (HCT)
- Hounslow Safer Transport Team
- Iain Duncan Smith MP
- Ikea
- Ilford BID
- Impact
- Independent Disability Advisory Group
- Institute for Public Policy Research
- Institute for Sustainability
- Institute of Couriers
- Institution of Civil Engineers
- inStreatham
- Islington Safer Transport Team
- Iveco
- James Brokenshire MP
- Jennette Arnold AM
- Jeremy Corbyn MP
- Jim Fitzpatrick MP
- Joan Ryan MP
- Joanne McCartney AM
- John Cryer MP
- John McDonnell MP
- Jo Johnson MP
- Jon Cruddas MP
- Julia Lopez MP
- Justine Greening MP
- Karen Buck MP
- Karsan
- Kate Hoey MP
- Kate Osamor MP
- Keir Starmer MP
- Keith Prince AM
- Kensington & Chelsea Safer Transport Team
- King's College Hospital
- King's College London
- Kings Ferry
- Kingston First
- Kingston Safer Transport Team

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- Kingston Town Centre Management Limited
- KIPPA
- Kwasi Kwarteng MP
- Lambeth Safer Transport Team
- Len Duvall AM
- Leonard Cheshire
- Leonie Cooper AM
- Lewisham Community Transport Scheme
- Lewisham Safer Transport Team
- Lewisham Shopping Centre
- Licensed Private Hire Car Association (LPHCA)
- Licensed Taxi Drivers' Association
- Lilian Greenwood MP
- Living Streets
- London Ambulance Service
- London Borough of Barking & Dagenham
- London Borough of Barnet
- London Borough of Bexley
- London Borough of Brent
- London Borough of Bromley
- London Borough of Camden
- London Borough of Croydon
- London Borough of Ealing
- London Borough of Enfield
- London Borough of Hackney
- London Borough of Hammersmith & Fulham
- London Borough of Haringey
- London Borough of Harrow
- London Borough of Havering
- London Borough of Hillingdon
- London Borough of Hounslow
- London Borough of Islington
- London Borough of Lambeth
- London Borough of Lewisham
- London Borough of Merton
- London Borough of Newham
- London Borough of Redbridge
- London Borough of Richmond upon Thames
- London Borough of Southwark
- London Borough of Sutton
- London Borough of Tower Hamlets
- London Borough of Waltham Forest
- London Borough of Wandsworth
- London Cab Drivers Club
- London Chamber of Commerce and Industry (LCCI)
- London City Airport
- London City Tours
- London Clinical Senate
- London Councils
- London Cycling Campaign
- London Duck Tours
- London Fire and Emergency Planning Authority
- London Fire Brigade
- London First
- London General
- London Private Hire Board
- London Riverside
- London Sovereign
- London Sustainability Exchange
- London Taxi Company (LTC)
- London TravelWatch
- London United
- Love Wimbledon
- Low Carbon Vehicle Partnership (LowCVP)
- LTCOA
- Lyn Brown MP
- MAN Truck & Bus UK
- Marble Arch London
- Margaret Hodge MP
- Mark Field MP

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- Marsha De Cordova MP
- Marshalls
- Mary Creagh MP
- Matthew Offord MP
- Matthew Pennycook MP
- Megabus London
- Meg Hillier MP
- Mercedes-Benz UK
- Merton Community Transport (MCT)
- Metrobus Ltd
- Metroline Ltd
- Metropolitan Police Service
- Metropolitan Police Service – Community Police
- Metropolitan Police Service – Heathrow Airport
- Metropolitan Police Service – NE TMU
- Metropolitan Police Service – NW TMU Islington, Barnet, Haringey, Camden
- Michael Fallon MP
- Michael Gove MP
- Mike Freer MP
- Mike Gapes MP
- Motorcycle Action Group
- National Association of Wedding Car Professionals
- National Council for Voluntary Organisations
- National Council for Voluntary Youth Services
- National Express Ltd
- Natural England
- Navin Shah AM
- Neil Coyle MP
- Neil Parish MP
- Newham Safer Transport Team
- New West End Company
- Next Green and Ecolane Consultancy
- Nick Hurd MP
- Nicky Gavron AM
- Nissan
- Northbank BID
- Oliver Dowden MP
- Onkar Sahota AM
- Oxford Tube
- Paul Scully MP
- Peter Whittle AM
- Policy Exchange
- Port of London Authority
- Premium Tours
- Purley BID
- Putney BID
- Quality Line
- RAC
- Rail Freight Group
- Redbridge Safer Transport Team
- Redwing North Kent
- Renault Trucks UK
- Retail Motor Industry Federation
- Richard Harrington MP
- Richmond and Kingston Accessible Transport
- Richmond BID
- Richmond Safer Transport Team
- RNIB
- Road Haulage Association
- Rosena Allin-Khan MP
- Royal Borough of Greenwich
- Royal Borough of Kensington & Chelsea
- Royal Borough of Kingston Upon Thames
- Rupa Huq MP
- Rushanara Ali MP
- Ruth Cadbury MP
- Sam Gyimah MP
- Sarah Jones MP
- Sarah Wollaston MP

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- Scania GB
- Scope
- SECBE
- See London by Night
- Seema Malhotra MP
- Shaun Bailey AM
- Sian Berry AM
- Siobhain McDonagh MP
- Skanska
- SMMT
- Southbank BID
- South Bank Employers' Group
- South London Freight Quality Partnership
- Southwark Safer Transport Team
- Stagecoach
- Stansted Citylink
- Station to Station
- Stella Creasy MP
- Stephen Hammond MP
- Stephen Pound MP
- Stephen Timms MP
- Steve O'Connell AM
- Steve Reed MP
- Stratford Original
- Streatham BID
- Sullivan Buses
- Sustrans
- Sutton Community Transport
- Tanmanjeet Singh Dhesi MP
- Team London Bridge
- Technicolour Tyre Company
- Teresa Pearce MP
- Terravision
- TEVVA
- TGM
- Thamesmead Business Services
- The Chartered Institute of logistics and Transport
- The Fitzrovia Partnership
- The London Legacy Development Corporation
- Theresa Villiers MP
- This is Clapham
- Tom Brake MP
- Tom Copley AM
- Tony Arbour AM
- Tony Devenish AM
- Tower Hamlets Community Transport
- Tower Hamlets Safer Transport Team
- Tower Transit
- Transport and Environment
- Transport for All
- Try Twickenham
- Tulip Siddiq MP
- Unite the Union
- Unmesh Desai AM
- Uno
- UPS
- Valuing People (TfL's learning disability group)
- Vauxhall One
- Veolia
- Vicky Foxcroft MP
- Victoria BID
- Vince Cable MP
- Virendra Sharma MP
- Volvo Group
- Waltham Forest Safer Transport Team
- Wandsworth Community Transport
- Wandsworth Safer Transport Team
- Waterfall Garage Services Ltd
- Waterloo Quarter BID
- We Ride London
- Wes Streeting MP
- Westfield
- Westminster City Council

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- Westminster Safer Transport Team
- Westway Community Transport
- Whizz-Kidz
- Willow Lane BID
- Zac Goldsmith MP
- Zipcar

Appendix C: Summary of stakeholder responses

C1. Boroughs

City of London

- C1.1 The City of London Corporation supports the Mayor's proposals to tighten the LEZ in 2020 and expand the ULEZ in 2021, while acknowledging that the impact of the proposals within the City of London will be limited given the introduction of the central London ULEZ in 2019.
- C1.2 They call for more detail to be made available on the financial support to allow people and small businesses to become compliant with the expanded ULEZ. They are supportive of the measures to reduce emissions from buses in central London. They call for stronger measures on PHVs and state that no new diesel PHV should be licensed in London.

London Borough of Barnet

- C1.3 The London Borough of Barnet supports the proposals but would like to see a London-wide expansion of the zone as they are concerned about the impact on the North Circular as a boundary road. They would also like to see assistance given to six-plus seater vehicles and a residents' sunset period.

London Borough of Brent

- C1.4 The London Borough of Brent supports proposals to improve air quality. They are supportive of the proposal to strengthen the LEZ standards, but raise concerns about the potential lack of retrofit solutions for heavy vehicles, especially specialist vehicles. They are also concerned about the potential impact on businesses of a 2020 implementation date. Clarification is sought on whether non-compliant buses will be shifted to outer London between April 2019 and the changes to the London-wide LEZ.
- C1.5 They support a proposed expansion of the ULEZ but would prefer a London-wide expansion if sufficient mitigation for poorer residents and SMEs were in place. They have some concerns around displacement of traffic on to the North Circular Road. They raise concerns about the potential impact on charity minibuses and wish to see appropriate mitigation measures in place.
- C1.6 They call for a pan-London road user charging scheme coupled with investment in walking, cycling and public transport.

London Borough of Camden

- C1.7 The London Borough of Camden supports the proposals but wishes to see an earlier implementation of the LEZ changes. They do not believe that the charge level is sufficient to deter heavy vehicle trips. They believe the zone should be expanded London-wide and that there should be a London-based scrappage scheme.

London Borough of Croydon

- C1.8 The London Borough of Croydon supports tougher emissions standards in the London-wide LEZ. However, they would like to see a Euro 6 standard also applied to large diesel vans but they recognise the need to balance emissions against maintaining a voluntary sector and non-voluntary sector accessible minibus fleet. They support the expansion of the ULEZ. They accept that using the North and South Circular Roads as a boundary is a pragmatic solution but note that the ULEZ covers a much greater area north of the river.

London Borough of Ealing

- C1.9 The London Borough of Ealing supports the new Emissions Surcharge and the ULEZ expansion in principle. However they have strong concerns about the boundary and would like to see its expansion to cover the whole of London actively considered. They are concerned about the impact of displaced traffic on congestion and pollution in the borough. They call for it to be implemented in 2019 but request that full pre- and post-monitoring data is made available. They are concerned about the impact on residents and businesses that will have to regularly cross the border and would like to see a diesel scrappage scheme to support them.
- C1.10 They are concerned about the use of Euro standards and would like to see an investigation into more robust methods of measurement. For consistency and parity they would like to see motorcycles controlled at the same standard as petrol vehicles. They are critical of the data and the level of information provided, and call for more information, especially on an expanded ULEZ boundary, so that boroughs are able to make informed decisions. They understand that the inner London ULEZ will worsen air pollution in some areas and they are unable to support proposals until there is a guarantee for funding to develop solutions to mitigate this. They would also like the Mayor to incentivise the use of smaller cars in London as the recent growth in the size of vehicles is creating congestion and safety issues.

London Borough of Enfield

- C1.11 The London Borough of Enfield believes the ULEZ should be expanded London-wide, and that further evidence on the impacts of a London-wide zone for light vehicles should be provided. They highlight the risks of additional traffic on roads around the boundary and the issues for residents who live outside the proposed boundary in accessing amenities such as hospitals within the proposed zone.

London Borough of Hackney

- C1.12 The London Borough of Hackney is supportive of the principle of extending the ULEZ and strengthening the LEZ. They are satisfied that a resident sunset clause is not required for the ULEZ. However, they would like the ULEZ to be extended to cover the whole GLA area. They are concerned that the current boundary dissects 14 boroughs which will affect support if residents and smaller businesses have to regularly cross the border.

- C1.13 They are concerned that sufficient costings and a cost-benefit analysis have not been provided to support the rejection of the GLA boundary option. They also note that, even with the extension as proposed, there will be areas inside that will still exceed limits. They are disappointed that modelling of the effect of a London-wide ULEZ has not been done to show if this would change this.
- C1.14 They are also concerned about the lack of plans/funding to introduce Zero Emissions Zones to support affected areas. They call for a clear timetable for the delivery of more detailed modelling of a London-wide ULEZ and a timetable for implementing the scheme earlier than 2050. They argue that the cost of installing an enforcement infrastructure at the GLA boundary should be viewed in the context of potential reduced future costs for other initiatives. They also think excluding outer London is a missed opportunity to encourage modal shift in outer London as outlined in the MTS. They are also concerned about the lack of proposals to upgrade the standards for large diesel vans.

London Borough of Hammersmith & Fulham

- C1.15 The London Borough of Hammersmith & Fulham calls for a more ambitious and earlier implementation date for tougher vehicle emissions standards for the LEZ and would like to see the London Lorry Control Scheme revised to complement this. They would like to see off-peak freight transport incentivised as long as it did not conflict with residential amenities and would like to see encouragement of quiet/zero tailpipe emission lorries. They would like the ULEZ extended to cover the whole of London and for it to be implemented earlier. They are concerned about the Euro standards being the measure of compliance given the difference in real-world driving emissions.

London Borough of Haringey

- C1.16 The London Borough of Haringey welcomes the principle of expanding the ULEZ up to the North and South Circular Roads. They would welcome the inclusion of the roads in a future expansion if concerns about traffic displacement were addressed and mitigated against. They have concerns that the implementation date is too early and call for re-introducing a sunset period for existing residents and businesses. They would also like reassurances that a proactive and comprehensive awareness campaign will be carried out to ensure that the public are engaged at the earliest opportunity to allow sufficient time for them to assess their options.
- C1.17 They are concerned that locally-specific information on the costs and benefits has still not been made available to them. They would also like more information on the physical implementation of the scheme and the costs/resource implications so they can understand what might be expected of them. They call on the Mayor to continue to explore scrappage options and that funding generated from the expansion is used to support alternatives to the use and ownership of petrol and diesel vehicles.

London Borough of Havering

- C1.18 The London Borough of Havering supports the proposal but states that engagement with small businesses is essential, due to the large amount of small businesses and the logistics sector in the borough. They think that we should support small businesses to ensure they understand how the proposals affect them to give them sufficient time to adapt their fleets. They believe that the proposals could cause an issue with parking to avoid taking vehicles into the ULEZ; this already happens with Essex residents when accessing rail services. They are concerned that more polluting buses will be moved to Havering as inner London services are replaced by low emission vehicles. They do not oppose the full extension of the ULEZ in principal, as long as there is a sufficient lead-in period and engagement.

London Borough of Hounslow

- C1.19 The London Borough of Hounslow recognises that air quality is an important issue for the borough. They support the expansion of the ULEZ and tighter emissions standards in the LEZ. However, they have a number of concerns about the boundary of the expanded zone, the removal of the sunset period and the lack of plans to address poor air quality in the Heathrow area. They are concerned about the expanded boundary splitting the borough, and about the removal of the sunset period which will place undue pressure on residents (who with limited public transport options have little other choice but to drive) and small businesses. They would like a sunset period of 18–24 months and a scrappage scheme directed at LGVs.
- C1.20 They are also concerned that the boundary ignores a number of hotspots in the borough and call for more detailed modelling and mitigation schemes for key boundary junctions such as Kew Bridge and Chiswick Roundabout. They also call for a localised boundary extension to the Chiswick Roundabout, to minimise the impact on the Hogarth Roundabout from displaced M4 traffic trying to avoid the charge. They suggest that complementary schemes such as bringing forward the target for a zero emission bus fleet would have a greater effect on air quality in outer London.
- C1.21 They would also like to see the inclusion of lighter vehicles in the LEZ with a lower standard and phased tightening of emissions standards to ensure improved air quality in outer London (especially around Heathrow and radial TLRN routes).

London Borough of Islington

- C1.22 The London Borough of Islington supports the proposals but wishes to see the ULEZ expanded over a wider area and sooner. In addition they request more detail on the enforcement and operation of the scheme and the impacts on the borough.
- C1.23 They support a restriction on all diesel vehicles, including Euro 6 diesels.
- C1.24 They propose an alternative charging system where Euro IV vehicles are charged £200. They believe that vehicles should be charged each time they

enter a new zone. They would also like to see a higher charge level for vans and a London-wide Euro 4 LEZ standard for vans.

- C1.25 They support the reduction in the residents' sunset period, but would also like to see a gradual charge for residents increasing over time during the sunset period.
- C1.26 They support the sunset period for emergency vehicles, but oppose exemptions for historic and Showman's vehicles. They would like to see more action to tackle emissions from taxis and PHVs.

London Borough of Lambeth

- C1.27 The London Borough of Lambeth generally supports the proposals. They would like to see the boundary extended to the M25 as Lambeth is severed in two by the proposed boundary and they are concerned about local increases in traffic. They support the ULEZ charge level (although they think it should be subject to review) and the PCN increase, and want more information about the LEZ charge level.

London Borough of Lewisham

- C1.28 The London Borough of Lewisham is concerned about the lack of refuse vehicles available to them, the boundary and funding. Lewisham supports a London-wide ULEZ in 2025. They are concerned about traffic displacement and that the cost to TfL of setting up the scheme will equate to lower LIPs contributions.

London Borough of Newham

- C1.29 The London Borough of Newham supports the proposals. However they wish for greater detail to be provided on traffic displacement in local areas and wish to work with us to address any unintended consequences from the boundary.
- C1.30 They would welcome any support for low income families and small businesses to upgrade their vehicles. They state that more investment is needed in public transport to provide an alternative to cars.

London Borough of Redbridge

- C1.31 The London Borough of Redbridge supports the upgrade of the existing LEZ and, whilst they support the principle of expanding the ULEZ, they would like the boundary to mirror the LEZ boundary. They are concerned that the current proposed boundary dissects their borough and will lead to significant vehicle displacement from drivers avoiding the ULEZ area. This would negatively impact on congestion and localised pollution concentrations.
- C1.32 They do not feel that the London-wide boundary option has been adequately explored and would like more information on how we plan to reduce pollution on the TLRN. They call for financial assistance from the Mayor to assist in meeting council fleet modifications/replacement costs.

London Borough of Richmond upon Thames

- C1.33 The London Borough of Richmond upon Thames supports the proposed changes to the LEZ but highlights the potential impact on small businesses. They believe exemptions to some vehicles may need to be monitored.
- C1.34 They believe that the ULEZ should cover all of London, and that the GLA should provide support and funding for Clean Air Zones around the borough's focus areas. They believe there is the potential to displace traffic and increase emissions in areas outside the proposed zone.

London Borough of Southwark

- C1.35 The London Borough of Southwark does not believe that sufficient data has been made available in the consultation on the potential displacement of vehicles in areas close to the proposed ULEZ boundary, and raises concerns on how the ULEZ will be enforced.

London Borough of Sutton

- C1.36 The London Borough of Sutton supports the proposed change to the LEZ standard in 2020. They believe that the health benefits from reduced air pollution are justification for the cost impact to businesses.
- C1.37 They would welcome the consideration of a London-wide ULEZ, with a full appraisal of the costs and impacts on residents.
- C1.38 They raise concerns about the potential for increased uptake of non-compliant diesel vehicles outside the zone. They request that additional revenue is spent on public transport, including the Sutton Tramlink.

London Borough of Waltham Forest

- C1.39 The London Borough of Waltham Forest supports the increased priority and profile that the Mayor has given to tackling air pollution. However, they remain concerned about increased congestion and displacement of traffic from the proposed extended boundary and feel that sufficient modelling and cost data (especially down to borough level) has not been made available to them to allow them to make an informed decision. They call for it to be extended further to cover all London boroughs. They call for a further sunset period for residents and businesses in the expanded ULEZ.
- C1.40 They feel it is essential that further education and awareness campaigns are run to ensure the seriousness of the impact of poor air quality is recognised by all Londoners. They suggest a number of potential alternatives including establishing a delivery partnership for managing and maintaining an EV charging point network; developing local Zero Emission Zones; and speeding up the cleaning of the public transport network.
- C1.41 They support strengthening the LEZ standards but would like a commitment that dirtier buses from central London will not simply be moved to outer London. They seek clarification on the role of the Woolwich Ferry and how it would work with the ULEZ boundary especially at night time, and

they are concerned about any agreement to an 'exempt corridor' especially using the A12.

London Borough of Wandsworth

- C1.42 The London Borough of Wandsworth broadly supports the proposals to tighten the standards for the LEZ. However, they are mindful of the impact on small businesses and the council's own fleet given their own savings programme. They call for exemption of some specialist vehicles with long life spans or where replacement costs are excessive or daily mileage limited. They are also concerned about the impact on local community groups and charities and would like to see support for them to replace vehicles. They are concerned about the extension of the ULEZ and the increase in emissions from vehicles avoiding the zone and using the South Circular. They think more detailed modelling is required on local impacts and that the data provided in the consultation is too generic – there needs to be more focus on the areas around the boundary.
- C1.43 They do not feel the South Circular Road is a suitable boundary as it is a collection of local roads. Unless the Mayor can evidence that the South Circular boundary will not disproportionately affect the borough (both residents and businesses) then they call for the boundary to be extended to the M25. They feel the London-wide boundary option has not been explored properly. They also question whether all other alternatives have been investigated sufficiently and whether the ULEZ provides the best value option.
- C1.44 They are also concerned that the proposals are not equitable for all users (15 years for taxis versus six years for diesel cars). They are concerned whether the sunset period for disabled passenger vehicles is adequate. They would also like to see further information on the future development of the ULEZ. They call for assurances that all revenue raised will be used to fund wider actions to improve air quality.

Royal Borough of Greenwich

- C1.45 The Royal Borough of Greenwich generally supports the proposals, and in some cases believes they should go further, stating that the ULEZ should cover the whole of London, using the M25 as a boundary as it is more capable of handling the excess traffic. Using the North and South Circular Roads as a boundary could have negative impacts for the borough due to the displacement of traffic.
- C1.46 They believe that wider public transport issues in the borough need to be overcome to reduce car dependence, and that there is a need to consider the impact on low income workers who own a non-compliant car and work unsociable hours as well as the impact on SMEs. They welcome the proposal but think it needs to be supported by measures to improve public transport and support those on low incomes.

Royal Borough of Kensington and Chelsea

- C1.47 The Royal Borough of Kensington and Chelsea supports the proposals for the change to the LEZ and the expansion of the ULEZ, but would support earlier introduction of the expanded ULEZ.
- C1.48 They highlight that the proposals are not expected to significantly reduce particulate matter emissions.

Royal Borough of Kingston upon Thames

- C1.49 The Royal Borough of Kingston upon Thames is broadly supportive however they have a number of concerns. They are concerned that expanding the ULEZ will increase the number of non-compliant vehicles in the borough if they become much cheaper. They want the revenue generated to be spent on improving public transport in outer London boroughs as well as inner ones as their residents will also pay the charge. They support the LEZ proposals but note that there will still be non-compliant areas in Kingston, which is rare for an outer London borough and they are keen to address these with the GLA.
- C1.50 They are concerned that the LEZ cuts through the borough and that this could provide an 'escape route' for vehicles. They note the potential noise benefits of newer vehicles. They would welcome consideration of a London-wide ULEZ but would need the data before making a judgement.

Westminster City Council

- C1.51 Westminster City Council is strongly supportive of both the LEZ and ULEZ proposals, and state they are taking ambitious steps to reduce pollution in their borough, through Low Emission Neighbourhoods and enforcement against idling vehicles. They note that only one school (located in the borough) will be in an area of NO₂ exceedence by 2025 and would welcome support in bringing this into compliance. They request a sunset period in line with that for residents for local authority essential service vehicles as they believe that April 2019 is unfeasible due to a procurement plan to introduce these vehicles by 2020.
- C1.52 They suggest a phased approach to introduce a significant amount of fleet compliance by April 2019, and for all vehicles to be compliant by September 2020 and attached a letter written to the Deputy Mayor, Environment and Energy on this.

C2. Business organisations/BIDS

Brentford Chamber of Commerce

- C2.1 The Brentford Chamber of Commerce raises concerns that the changes are too soon. They are seeking clarity on alternative fuels and interchange points for passengers and vehicles to transfer to zero emission vehicles. They believe funding should be made available from the GLA to support this transition.

- C2.2 They support the historic vehicle exemption, but state this should be a rolling exemption and request exemptions for specialist vehicles.

Brewery Logistics Group

- C2.3 The Brewery Logistics Group raises concerns about the disproportionate impact on HGV operators and points out that the alternative means of travel for cars are not there for fleets.

Builders Merchants Federation (BMF)

- C2.4 The BMF thinks that the London-wide Euro VI standards for heavy vehicles should be introduced later than 2020, and that the proposed charges are too high.
- C2.5 They think that complying with the Congestion Charge, the T-Charge, the LEZ and the ULEZ means additional financial, operational and administrative burdens for its members. They are concerned that insufficient time exists to make the necessary operational changes and that SMEs face disproportionate costs to do so.

Confederation of British Industry (CBI)

- C2.6 The CBI welcomes the Mayor's ambition to improve air quality, but emphasises the importance of working with business to support the transitions required. They provide three key points to ensure a 'smooth and cost-effective' transition to the ULEZ: clear and consistent communication is needed between business, the GLA, TfL and local authorities; the capacity of HGVs must be recognised, and need to be supported to ensure a successful transition to meet the ULEZ requirements; and the Mayor of London must work with Government and regional Mayors to create a national consistent clean air policy.

Federation of Small Businesses (FSB)

- C2.7 The FSB does not support the proposals because they believe implementing tougher vehicle emissions standards will affect very many small and micro businesses. They feel the proposed timescales do not allow sufficient time for vehicles owners to upgrade their business vehicles.

Heart of London Business Alliance

- C2.8 The Heart of London Business Alliance supports the proposals, but requests assistance for residents and small businesses to replace their vehicles.
- C2.9 They believe more action needs to be taken to accelerate the roll-out of zero emission capable taxis. They support measures to encourage freight consolidation.
- C2.10 Finally they request information on how the expanded ULEZ will be enforced.

London Chamber of Commerce and Industry

- C2.11 The London Chamber of Commerce and Industry does not oppose the principle of the ULEZ, however, they feel there are unanswered questions on impacts and costs and that all options must be fully costed and consulted on. They argue that the proposals must strike a balance between delivering air quality improvements and allowing businesses (particularly SMEs) to adapt.
- C2.12 They are concerned that the IIA and the data it uses are not sufficiently robust. They feel a more robust assessment of the impact on businesses (especially SMEs) is required before they can support any changes. If the proposals are taken forward, they call for measures to mitigate the impact, such as sunset periods for businesses to match those offered to residents and transitional and graduated charging levels to give businesses the necessary breathing space to invest in ULEZ compliant vehicles.

London Property Alliance (LPA)

- C2.13 The LPA states that it is 'broadly supportive' of the proposals to extend the ULEZ and recognises that air pollution is a critical issue for people across central London. It supports the extension to the North and South Circular Roads by 2021 to extend these air quality benefits. However they raise concerns about the charging. They believe a zonal charge will encourage drivers to maximise the distance they travel in an area to reduce the 'per distance' cost and that a road pricing scheme where distance, route and vehicle type are all considered is needed.
- C2.14 They also suggest a freight consolidation scheme. They have concerns about the impact on independent small businesses that are reliant on vehicles and state that the focus should be placed on how to assist their transition to ULEZ standards. They raise an issue with the consultation format stating that the wording promotes positive responses and a numeric summary does not allow for concerns to be raised as comments are seen as supplementary.

Marble Arch London

- C2.15 Marble Arch London supports the proposals and particularly extending the ULEZ to the North and South Circular Roads. However, they are concerned about the two-year period between the introduction of the ULEZ and its extension as this may mean that the Edgware Road may be adversely affected because it would be on the edge of the initial zone. They support the proposal to bring forward the sunset period for residents and the higher emissions standards for HGVs. They suggest that revenue raised is used to support programmes to help businesses reduce the number of vehicles they need for delivery and servicing needs.

New West End Company (NVEC)

- C2.16 The NVEC welcomes the proposals. Air quality is a significant concern to visitors to the West End.

Team London Bridge

C2.17 Team London Bridge strongly supports the LEZ and ULEZ proposals although they think they should be implemented sooner. They state that there is a high level of support for proposals to improve air quality and to deliver the principles of Healthy Streets from businesses.

Victoria BID

C2.18 The Victoria BID strongly supports the LEZ and ULEZ proposals, however they state that these changes need to be accompanied by more public electric charge points to cater for increased demand. They would like clarity on whether military vehicles (and if so what type) are to be exempt.

Westminster Business Improvement Districts

C2.19 The Westminster BIDS supports the proposals to improve air quality for visitors, residents and workers. They propose additional action on boiler emissions and waste consolidation. They would support any initiatives to aid small businesses into making the transition.

C2.20 They raise concerns over the exemption of taxis and request greater provision of charging points for the uptake of electric taxis. Finally they request detail on how the scheme will be enforced.

C3. Businesses

Balfour Beatty

C3.1 Balfour Beatty supports efforts to address air pollution, but raises concerns about the potential impact on businesses and their supply chain.

C3.2 They would support a national vehicle scrappage scheme. They raise concerns about the impact of non-transport emissions and call for a fund to help companies adversely affected by the charge. They question the black cab exemption and suggest other businesses affected by the charge could benefit from similar exemptions.

C3.3 They state that additional investment is needed in public transport.

CitySprint

C3.4 CitySprint answered the portal questions without additional comment.

John Lewis Partnership

C3.5 The John Lewis Partnership strongly welcomes the Mayor's bold plans to tackle air pollution but they are concerned that the proposals in their current form will make it difficult and costly for businesses to implement them. They recommend delaying the extension start date in order to help with the cost of fleet replacement. They would like to see targeted 'sunset' extensions to allow extra time for fleet replacement. They also call for us to consider

incentives to companies to invest in alternatively fuelled vehicles such as allowing preferential access to bus lanes.

- C3.6 They are concerned about the daily charge for commercial vehicles and suggest a £50 charge would be more proportionate. They call for clarity over the Direct Vision Standard requirement as at the moment it represents an obstacle to complying with the ULEZ standards and call for a delay in introduction to match the tightening of the London-wide LEZ. They would like to see other measures introduced to reduce other road freight costs at the same time as introducing air quality measures – such as reforms to the London Lorry Control Scheme and improving loading facilities to reduce PCN costs.

Tideway

- C3.7 Tideway generally supports the proposals although highlights a few concerns about disrupting the supply chain to their sites. There are three Tideway sites in the CCZ and Tideway expects that the 'majority' of HGVs delivering to these sites will be able to meet the ULEZ in 2019. They envisage little impact from the new LEZ standards in 2020. They state that the ULEZ in 2021 would 'make no difference' as the new LEZ will already be in operation with higher standards. They note a potential concern that small sub-contracted hauliers will be affected and pass on the cost to their customers (ie Tideway). They ask us to support the haulage industry through pro-active communications / incentives / FORS / sunset periods.

Veolia

- C3.8 Veolia supports proposals to improve air quality but expresses some concerns about the potential impact on local authority waste collection. They raise concerns about the lack of certification for specialist vehicles and suggest a sunset period for local authority refuse collection vehicles.
- C3.9 Finally they seek certainty that the ULEZ standards will remain as they currently are for the next few years.

C4. Coach and bus operators

Arriva

- C4.1 Arriva supports the measures proposed in the consultation. In particular they support the proposed exemptions to the charges; highlighting heritage buses that they operate which they believe would not be suitable for retrofitting.

Confederation of Passenger Transport (CPT)

- C4.2 The CPT is concerned about the availability of retrofits and they state that the cost of testing new retrofits for each engine type/chassis combination in the UK is high, and that there is a lead time of five to six months to get a test slot at Millbrook. They believe that testing solutions are not economical for rarer engines. They propose an alternative approach where the

ULEZ/LEZ are delayed until retrofit options are available or extensions for coach operators. They ask for support in getting the LowCVP to run an accreditation scheme, data on engine types, funding for retrofit development, addressing idling and other measures, a phased approach for coaches, funding/loans for retrofits, and a traffic light priority for coaches.

- C4.3 They provide detailed suggestions to reduce idling and ask us to improve coach facilities (drop-off/set-down/parking places) to reduce circulation. They provide a figure that shows a map of members with a concentration around London and a table that shows the likely outcome of the ULEZ/LEZ on different coach business models. They also list the likely impacts on London and Londoners.
- C4.4 They provide case studies claiming small operators may no longer be viable and about costs being passed on. They note that the per passenger NO_x is low, and whole vehicle emissions are comparable to cars. They question how enforcement will work with retrofits. They note issues with training vehicles and competition with us, although this point is unclear. Appendix 1 details a survey of their members which estimates only 63 per cent of coaches will be compliant by 2020.

London Tourist Coach Operators Association (LTCOA)

- C4.5 The LTCOA supports efforts to improve air quality. However they raise concerns about the potential impact on hire companies running Euro V vehicles to support school trips.
- C4.6 They raise concerns about the lack of a retrofit solution and the lack of affordable second-hand vehicles.
- C4.7 They request assistance with retrofit, or a grace period for operators who have ordered retrofit equipment but have been unable to install it in time for the October 2020 deadline.

National Express

- C4.8 National Express welcomes the Mayor's determination to improve air quality. They support the expansion of the ULEZ and also changes to the LEZ. However, they would like to see a more balanced approach to reducing emissions that focuses on both transport operators and car users. They call for the role of coaches as an option for low carbon, clean public transport provision to be better recognised. They would also like assurances that Clean Air Zones are not viewed in isolation from other traffic management and congestion-minimising measures (including modal shift away from private car use) which are all required to deliver significant air quality improvements.

Routemaster Association

- C4.9 The Routemaster Association supports the proposals so that all historic and pre-1973 vehicles are exempt in order to align with the LEZ and T-Charge regulations.

Stagecoach London

- C4.10 Stagecoach supports attempts to improve air quality but raises concerns about the cost of making the training fleet compliant. They request an additional two years for this part of the fleet to be compliant.

C5. Environmental groups

Air Quality Brentford

- C5.1 Air Quality Brentford supports the changes to the LEZ and the expansion of the ULEZ but would like to see both proposals implemented sooner and for the ULEZ boundary to be extended to Brentford and also out to the M25 as there are major arterial routes running through residential areas. They feel that not including the North and South Circular Roads will exacerbate existing conditions in Brentford.

Bloomsbury Air

- C5.2 Bloomsbury Air calls on the Mayor to be more bold and progressive. They would like the ULEZ to be implemented within this Mayoral term and for it to be extended to cover all areas of London. They want to see a continued focus on encouraging cycling and walking as they see behaviour change as fundamental to improving air quality. They would like the Mayor to address other sources of pollution and also to lobby for a new Clean Air Act nationwide.
- C5.3 They support the introduction of a scrappage scheme. They are concerned about the use of the 'Euro classification' system and think standards should be set on real-world emissions tests. They support the retrofitting of buses but would like the transition to zero emissions accelerated. They oppose the exemption of taxis and PHVs and would like to see assistance offered to the trade to scrap older dirtier vehicles. They would like the Mayor to work towards an emissions-based road charging to replace the individual initiatives. They call on the Mayor to ensure a number of supporting measures to reduce traffic.

Campaign to Protect Rural England (CPRE)

- C5.4 The CPRE answered the portal questions but did not provide a written response.

Clean Air for Brent

- C5.5 Clean Air for Brent would like to see the changes to the LEZ brought in sooner and an extension of the boundary of the ULEZ to include the North and South Circular Roads. They would like assurances that a comprehensive multi-media campaign will take place to make residents aware of impending changes, to give them as much time as possible to transition to compliant vehicles. They would like to see the introduction of a diesel scrappage scheme to assist those wishing to make the transition.

They oppose the exemption for taxis and want to see better efforts to accelerate the adoption of cleaner models.

ClientEarth

- C5.6 ClientEarth welcomes the Mayor's commitment to tackling London's air pollution. However, they call on the Mayor to increase the ambition of his proposals. They would like assurances that he is considering all technologically possible measures that will bring about compliance with legal limits in the shortest time possible, and reference the finding of the judgement in ClientEarth No2 v Secretary of State for the Environment, Food and Rural Affairs.
- C5.7 They call for a stronger, bigger London-wide ULEZ to be brought in as soon as possible. They are concerned about the lack of detailed technical information provided in the consultation on the option of a London-wide ULEZ scenario. They call for the Mayor to detail how he will tackle remaining hotspots outside of the proposed expansion area.
- C5.8 They would like to see that the set of standards for the ULEZ ensures vehicles entering are the cleanest available on the road and not just in the lab. They also call for the ULEZ to be designed so as to support other efforts to help people and businesses move to cleaner forms of transport. They support tougher vehicle emissions standards for the London-wide LEZ for heavy vehicles but call for their implementation date to be brought further forward than October 2020.

Friends of the Earth

- C5.9 Friends of the Earth supports the LEZ and ULEZ proposals, but believes they should go further. They would like the ULEZ to cover the whole of London and be implemented sooner than proposed. They would also like Zero Emission Zones to be implemented sooner, and recommend that the Mayor works with boroughs and provides funding to implement these in areas with the highest levels of air pollution. They believe that supporting measures are also needed, to reduce the amount of vehicles on the road as electric vehicles still contribute to dangerous levels of particulate matter. They believe that the ULEZ should be accompanied by increased funding for sustainable transport, and that road building proposals such as the Silvertown Tunnel should be scrapped. They support a diesel scrappage scheme and urge the Mayor to bring forward plans to look at a broader road user charging system.

Greenpeace

- C5.10 Greenpeace supports the expansion of the ULEZ to the North and South Circular Roads but believes this should take place within the current Mayoral term. They believe all new diesel vehicles purchased after the announcement of the ULEZ should be subject to the charge, and believe other short-term measures should be undertaken to reduce emissions from diesel vehicles.

- C5.11 They support full transition to electric vehicles and measures to shift away from private car use.

Hounslow and Brentford Friends of the Earth

- C5.12 The Hounslow and Brentford Friends of the Earth supports changes to the LEZ and the expansion of the ULEZ but they would like them to be introduced sooner and for the ULEZ to be expanded to cover the whole of London. They feel the proposed boundary will push polluting vehicles onto major trunk roads in and out of London and the North Circular. They recommend some further distinctions are made on the levels of emissions and distance covered.

Kingston Environment Forum

- C5.13 Kingston Environment Forum would prefer a charge per hour that reflects usage. They would support an extension of the ULEZ to all of Greater London. They believe there should be more incentives to scrap older vehicles and more clean buses and charging points.

Lambeth for a Cool Planet

- C5.14 Lambeth for a Cool Planet supports the extension of the ULEZ and the proposed changes to the LEZ. Although they understand the arguments for not including the North and South Circular Roads, they call for a review of the boundary to take place three years after implementation, and for this to include the consideration of extending the boundary. They also support the earlier expansion of the ULEZ, and would ideally like to see it in place before the 2020 Mayoral elections.

London Car Free Day 2018

- C5.15 London Car Free Day 2018 supports the ULEZ proposals, but believes the ULEZ should be London-wide for all vehicles. They believe standards should be set in line with real-world emissions. They support a Zero Emission Zone in central London by 2025.
- C5.16 They would like to see London take part in Car Free Day 2018.

London Sustainability Exchange

- C5.17 The London Sustainability Exchange supports all the proposals but wants the ULEZ sooner and larger.

Make Air Safe and Clean

- C5.18 Make Air Safe and Clean supports proposals to improve air quality but are concerned about the possible impact of the North and South Circular Roads as a boundary, particularly in London Borough of Richmond upon Thames. They would like to see the proposals implemented sooner and London-wide for all vehicles. They would also like to see a more ambitious timetable for retrofitting old buses and introducing zero emission buses.

Richmond and Twickenham Friends of the Earth

- C5.19 Richmond and Twickenham Friends of the Earth supports a London-wide expansion of the zone and raises concerns about the potential adverse impacts of the boundary.

Sustainable Merton

- C5.20 Sustainable Merton strongly supports the LEZ and ULEZ proposals though states that the ULEZ proposals should be expanded to cover the London Borough of Merton and other boroughs adjacent to the South Circular.

Sustrans

- C5.21 Sustrans supports the proposals but wants the ULEZ boundary to be expanded and supported by Zero Emission Zones, as well as higher standards for the existing London-wide LEZ. They believe mode shift should also be encouraged through major investment in sustainable alternatives, as this will also reduce PM_{2.5} emissions from road traffic. They are concerned that Euro Standards 'are not sufficiently robust to deliver the expected benefits', and ask the Mayor to lobby the Government and the EC to develop a more robust real-world emissions standards regime.
- C5.22 They think that the ULEZ should cover 'as much of London as practicable' and they note that many corridors and town centres in outer London suffer from excessive pollution. They suggest a longer-term London-wide road pricing strategy sensitive to emissions. They raise concerns over timescales due to political uncertainty as the proposal would take place after the next Mayoral election, and state that the schemes should be delivered before the 2020 election.

Wandsworth Environment Forum

- C5.23 The Wandsworth Environment Forum answered the portal questions without further comment.

C6. Freight organisations

Freight Transport Association (FTA)

- C6.1 The FTA recognises the seriousness of the air quality challenge, but is highly concerned about the implications for many businesses, particularly specialist fleets and those based within the zones. They think that uncertainty about which vehicles will meet the requirements of the Direct Vision Standard is also hampering operators' fleet replacement plans. They think the purpose of the ULEZ is to simply speed up the replacement of vehicles to bring forward the air quality benefits but that this uncertainty is leading to the opposite and in the meantime, the Capital is missing out on potential early air quality improvements.
- C6.2 The FTA recommends delaying the start dates to give operators more time to comply, allowing targeted extensions for certain local or specialist fleets

and exemptions for vehicles accessing Authorised Testing Facilities (ATFs), and taking other steps to reduce road freight costs.

Road Haulage Association (RHA)

C6.3 The RHA is concerned about the impact of the LEZ proposals stating that they will lead to 'business closure and disruption to road haulage'. They believe the charging levels will be catastrophic, due to small businesses not being able to keep pace with the unrealistic timeframes. They think this policy will lead to more LGVs being used as they can be adapted more quickly, increasing congestion. They recognise that air pollution is an issue but believe that road freight is essential for the city to function, and that the sector needs more time to react due to the financial demand of upgrading vehicles as there are no viable retrofit options.

UPS

- C6.4 In general UPS supports the Mayor's proposals to improve emissions. However they are concerned about the available options to procure compliant vehicles and would like to see flexibility provided to companies unable to procure but who can evidence procurement plans to demonstrate compliance.
- C6.5 They are also concerned about the lack of clarity over the Direct Vision Standard and would like to see proposals aligned, and start dates delayed, to ensure there is time to procure compliant vehicles. They are conscious of the limitations of the capacity of the grid to support EVs and call for more funding to be made available for infrastructure to allow simultaneous charging at night.
- C6.6 They would also like us to consider further innovative ways of ensuring sustainable delivery and logistics, especially for final mile deliveries. They call for further information on the cost/benefit of implementing a larger zone than proposed. They would also like reassurance that hybrids are treated in similar ways to EVs, as a larger zone will make it harder to operate purely EVs.

C7. Government organisations

London Councils

- C7.1 London Councils is supportive of measures to improve air quality. The majority of boroughs support the principle of expansion and an extension to all of Greater London.
- C7.2 London Councils does not feel that adequate data has been made available to make an informed decision and requests more information. They are concerned about the potential impact of traffic displacement on the areas outside the boundary, particularly the North and South Circular Roads themselves.

- C7.3 They are concerned about the displacement of older vehicles, particularly buses and taxis to outer London. They request more detail on the cost and enforcement mechanisms.
- C7.4 They also raise concerns regarding the use of the Woolwich Ferry as a boundary and question how the scheme will operate if vehicles are diverted into the zone due to road closures.
- C7.5 They support the proposals to strengthen the LEZ standard for heavy vehicles, but also request that this applies to vans as well.
- C7.6 They request more detail on the impact on individual boroughs, especially on the border and raise some concerns about the impact on disabled tax class vehicles, small businesses and low income workers. They request more detail on the impacts of a London-wide option and more detail on work to develop Zero Emission Zones.
- C7.7 They request better public transport in outer London and state that a 2050 London-wide ULEZ is not soon enough.
- C7.8 Additionally they request more information on our plans to reduce emissions on the TLRN and on how to improve the availability of second-hand ultra low emission vehicles for small businesses.

Port of London Authority (PLA)

- C7.9 The PLA generally supports the proposals. They would like to promote the river as a means of reducing freight traffic on roads. They note that the river is not specifically mentioned in the proposals.

C8. Health organisations/charities

British Heart Foundation

- C8.1 The British Heart Foundation supports the proposals due to the impact of air pollution on heart disease. They would like to see a London-wide ULEZ. They would prefer to see the proposals implemented before the end of the Mayoral term, but recognise that time is needed to introduce infrastructure and communications.

British Lung Foundation (BLF)

- C8.2 The BLF strongly supports the ULEZ and calls for it to be implemented as widely and quickly as possible. They would like to see it expanded across all London boroughs to ensure the largest number of vulnerable people is protected. They would like to see the ULEZ include as many schools, hospitals and care homes as possible – with a focus on areas of high rates of inequality and lung diseases. They request that Blue Badge holders and/or those with long-term health conditions are supported to change to cleaner vehicles and given more time to comply with standards.

Living Streets

- C8.3 Living Streets strongly supports the proposed changes to the LEZ and ULEZ, but thinks that complementary policies encouraging mode shift are also needed. They believe the ULEZ standards should be expanded beyond the North and South Circular Roads to match the LEZ as soon as possible. They think that the proposals need to be strengthened through boundary expansion and shorter timescales, as well as a tightening of emissions standards beyond Euro 6.
- C8.4 They also think more active travel measures are needed to encourage walking and cycling and increase the number of children walking to school. They think a mode shift is needed instead of switching car trips to low emission vehicles due to concerns over tyre and brake wear.

C9. Motoring groups

Alliance of British Drivers (ABD)

- C9.1 The ABD questions the scale of air pollution's impact on health and whether it should be considered a 'public health emergency'. They question the statistic on the number of deaths caused by air pollution. They point out that non-transport sources contribute to emissions. They claim there is a lack of a cost-benefit analysis showing that the cost of implementing the ULEZ will be higher than the value of health improvements caused. They state they have faced difficulty accessing our financial data and submitted a number of FOI requests. ABD carried out their own cost benefit analysis which they claim shows the cost to vehicle users is £516 million, while the health benefit is £7.1million.

British Motorcyclists Federation

- C9.2 The British Motorcyclists Federation opposes the inclusion of motorcycles within the ULEZ stating that they are lower polluting vehicles. They are concerned about the impact on lower income Londoners.

Federation of British Historic Vehicle Clubs

- C9.3 The Federation of British Historic Vehicle Clubs seeks clarification on the procedures for the exemption of historic vehicles.
- C9.4 They also propose that exemptions for foreign historic vehicles should be in line with the definition of historic from the vehicle's country of origin.

Motorcycle Action Group (MAG)

- C9.5 MAG believes motorbikes should not be charged as part of the ULEZ because they are a minor contributor to NO_x emissions, because motorbike users tend to be in lower income brackets, and because mode shift from motorbikes to buses or cars would increase emissions and congestion. They believe if charging is based on factors including tyre and brake wear then electric vehicles should also be charged. MAG includes a quote from the Mayor which appears to have been made before his election, stating his

support for motorbikes as a means of reducing emissions and congestion. MAG finds evidence of the link between air pollution and health effects inconclusive.

Motorcycle Industry Association (MCIA)

C9.6 The MCIA is broadly supportive of renewing the motorbike fleet however they think that the ULEZ proposals (area and charge level) are not proportionate for motorbikes due to their small contribution to NO_x emissions. They would like any charges to go towards a scrappage and renewal scheme.

RAC Motoring Services

C9.7 RAC Motoring Services are opposed to such a large expansion of the ULEZ. Given the impact on residents and businesses, they do not feel there is adequate evidence to justify such an increase, as many areas within the proposed area are not in breach. They would support a more bespoke expansion that covered problem areas, as long as there was a sunset period. They would prefer the Mayor to focus on the Low Emission Neighbourhoods scheme instead.

C9.8 They do not feel that 2021 provides sufficient time for drivers to change cars and think this will impact disproportionately on those driving older vehicles and those on lower incomes. They do not agree with an increase in the T-Charge rate as they do not feel there is sufficient evidence to show a higher charge would deliver further air quality benefits. They oppose the removal of the sunset period and also the increase in the PCN level as they do not feel it will deter non-payment and penalises genuine mistakes. They propose a tiered fee system.

Society of Motor Manufacturers and Traders (SMMT)

C9.9 SMMT supports the requirement for heavy vehicles to meet the Euro VI standard in the LEZ. However, they would like to see a flexible approach to enforcement for those operators planning to upgrade their vehicles. SMMT believes the cost benefit analysis should be published and that stakeholders should be given time to consider and provide feedback before any final decision is made.

C9.10 They would also like to understand what assessment was made of the different boundary options before deciding on this proposal. They feel that fleet renewal in itself will not deliver NO₂ reductions and would like to see additional measures to support the use and uptake of ULEVs to support the Mayor's aims.

We Ride London

C9.11 Three responses purporting to represent We Ride London were received, one without comment. The other two responses stated that motorcycles should be exempt from the charges and that more should be done to encourage motorcycling.

C10. Other

British Vehicle Renting and Leasing Association (BVRLA)

- C10.1 The BVRLA is generally supportive but is concerned about the financial impact on SMEs who use HGVs and LGVs. They are concerned about the lack of second-hand vans and the low residual value of Euro IV and V vans, making it difficult to fund an upgrade.
- C10.2 The BVRLA would like a three-year sunset period with a 90 per cent discount for operators who can demonstrate an adaptation plan. They suggest councils incentivise retiming deliveries and review the London Lorry Control Scheme. They would also like to promote their Mobility Credits initiative.

Chartered Institute of Environmental Health

- C10.3 The Chartered Institute of Environmental Health supports the proposals but believes that the ULEZ should be London-wide for all vehicles and that the emissions standards should be based on real-world conditions. They welcome the trajectory towards zero emissions in London and a Zero Emission Zone.

Cross River Partnership (CRP)

- C10.4 The CRP is supportive of the proposals both on timescales and coverage. They recognise that the proposals will add costs to residents and businesses, though the air quality benefits outweigh this. They think other environmental initiatives such as the T-Charge, Low Emission Neighbourhoods and cleaning up the bus fleet have signalled a welcome 'step change' to reduce emissions and deliver health and wellbeing outcomes.
- C10.5 They think revenue from the scheme and a diesel scrappage scheme should be used to help residents and businesses reduce emissions, though the schemes should be focused on reducing demand for motorised travel rather than shifting to EVs. They suggest improving the efficiency of travel and reducing congestion through various interventions including freight, servicing, and making active travel more attractive.

Diocese of Chelmsford

- C10.6 The Archdeacon of West Ham states that more could be done to provide EV charging points and encourage more cycling.

London Electric Vehicle Company (LEVC)

- C10.7 LEVC's response largely details information on LEVC and its electric vehicles. They support policy change which facilitates the introduction of electric light commercial vehicles, such as vans, which they will produce following the electric taxi launch.
- C10.8 LEVC supports measures for ULEZ compliance though they avoid commenting on charge levels.

Musicians' Union

- C10.9 The Musicians' Union supports the Mayor's efforts to reduce pollution but they have concerns over how the current plans will affect musicians and the cultural life of the Capital. Many musicians need to transport large instruments and equipment, so vehicles are essential to their work. Musicians are typically low paid and unable to earn enough to replace older vehicles or meet the charge.
- C10.10 They are worried that fewer musicians will take on work within the charging zone. They call for a scale of charges to be introduced for essential workers who need to travel by car.

C11. Other local authorities

Hertfordshire County Council

- C11.1 Hertfordshire County Council supports action to improve air quality in London but is concerned about the proposals to tighten the standards of the existing London-wide LEZ and the negative impact this may have in Hertfordshire.
- C11.2 They are concerned it will result in more polluting HGVs and buses concentrating at the boundary of Hertfordshire and the M25. They are also concerned that it could impact negatively on businesses in Hertfordshire who may be deterred from transporting goods into London rather than upgrade their fleets. They would like to see support for businesses for the cost of upgrading fleets and for Hertfordshire to be included in the Government's Green Bus Fund.

C12. Political representatives

Bambos Charalambous MP

- C12.1 Bambos Charalambous supports the principle of expanding the ULEZ to improve air quality. He raises concerns that this may adversely affect pollution on the North Circular and calls for a London-wide expansion for all vehicles to be considered.

Barking and Dagenham and Havering Green Party

- C12.2 Barking and Dagenham and Havering Green Party strongly supports the proposals, but believes they should be implemented sooner and the price to be paid if vehicles are not compliant should be higher. They also believe that the ULEZ should cover all London boroughs.

Barnet Green Party

- C12.3 Barnet Green Party supports an extension to the M25.

Caroline Pidgeon AM

C12.4 Caroline Pidgeon AM supports the measures set out in the consultation, but believes that the boundary for the ULEZ should be extended beyond the North and South Circular Roads. She highlights specific roads of high pollution excluded by the proposed boundary of the ULEZ.

Caroline Russell AM

C12.5 Caroline Russell AM believes that the LEZ and the ULEZ should be implemented sooner, within this Mayoral term (by May 2020). She thinks a smart road charging system should be introduced which charges by time of day, distance travelled and level of vehicle emissions; and that there should be improved fairness and exemptions for essential workers such as midwives and care workers. She thinks the zone should cover the whole of London, so 'no Londoner is left out' due to the health effects of bad air. She does not support a residents' sunset period as she thinks it will not discourage short car journeys, and that other interventions, such as improving public transport, and pedestrian and cycle provision, particularly in outer London, are needed.

Chiswick Liberal Democrats

C12.6 Chiswick Liberal Democrats support the change to the LEZ and the expansion of the ULEZ but believe the A4 running through Chiswick should be included in the ULEZ. They state that the A4 is the busiest and most polluted road in Chiswick and the wider borough of Hounslow, and highlight the schools and residences close to the road.

Cllr Cohen (Barnet)

C12.7 Cllr Cohen of Barnet states there should be a concession for families who have six-seater vehicles.

Cllr David Linnette (Richmond)

C12.8 Cllr Linnette of Richmond states that the ULEZ should be expanded to include all boroughs in London.

Gipsy Hill Green Party

C12.9 The Gipsy Hill Green Party supports the proposals but wishes for them to be implemented before the end of the Mayoral term. They propose free public transport for poor air quality days in line with systems on the continent.

Greenwich Conservatives

C12.10 The Greenwich Conservatives strongly object to the extension of the ULEZ to the South Circular. They remain unconvinced that adequate assessment of the local traffic impact on roads along the boundary has been carried out. They are particularly concerned about the negative air quality that the ULEZ will cause to schools on or near the South Circular. They are also concerned about the negative financial impact on residents, businesses and the emergency services. They call on the Mayor to drop the proposals

and instead spend the money on adopting the alternative package of measures to improve air quality detailed in the Conservative Members of the London Assembly 2017 report called 'Clearing the Air'.

Helen Hayes MP

C12.11 Helen Hayes MP supports tougher emissions standards in the LEZ but would like to see them introduced earlier. She supports the extension of the ULEZ but would like to see it extended beyond the South Circular Road. She is concerned that by excluding the road, the proposals do not address the fact that the road is a major source of particulate pollution. She is also concerned about some of the potential negative consequences such as increased pollution in areas south of the boundary, rat-running and parking pressures. She thinks if the current boundary remains then funding for monitoring and mitigation measures is necessary.

Herne Hill Green Party

C12.12 Herne Hill Green Party supports proposals to improve air quality but wishes for the proposals to be implemented by the end of the Mayoral term and with a London-wide ULEZ. Their preference is for an integrated London-wide road user charging scheme.

C12.13 They support the PM_{2.5} WHO standard, more traffic reduction and financial support for disabled people.

C12.14 They also support a cashback scrappage scheme and request more step-free stations in Lambeth.

Islington Green Party

C12.15 Islington Green Party fully supports the inclusion of Islington in the expanded ULEZ and would like to see it cover the whole of London and also for it to be brought in during this Mayoral term. They would prefer a charging system that incentivises people to drive less rather than a cordon based system.

Joanne McCartney AM

C12.16 Joanne McCartney AM supports the ULEZ implementation, though states that the boundary of the ULEZ should be the same as the LEZ, as up to the North and South Circular Roads would lead to congestion and rat-running to avoid the charge. She reiterates the need for a nationally funded diesel scrappage scheme, and devolution of 'road tax' collected from Londoners to invest in anti-pollution measures.

Lambeth Green Party

C12.17 The Lambeth Green Party states that London should seek to be compliant with NO₂ by 2020. They state that the ULEZ standard for PM_{2.5} should be based on WHO guidelines and that there should be a consultation on a London-wide ULEZ. They think diesel vehicles should be banned and that there should be a reduction in traffic as part of a wider road pricing scheme.

They think financial assistance should be made available to disabled drivers and operators of transport services for disabled people.

Lewisham Liberal Democrats

C12.18 Lewisham Liberal Democrats support a London-wide ULEZ. They raise concerns about the potential impact of the ULEZ on parking. They would support a scrappage scheme to reduce the impact on drivers of older vehicles.

London Assembly Environment Committee

C12.19 The London Assembly Environment Committee supports a wider and earlier ULEZ. They have concerns about bisected southern boroughs, and the use of the South Circular Road. They suggest other roads are used in the south such as the M25 as a boundary ideally. They think 2021 for the ULEZ is too late, and want it by the end of the Mayoral term. They state that if Euro 6 does not improve in real-world emissions tests, that they want Euro 6 diesels to be 'removed from exemptions'. They support VED devolution with London retaining the money. They also support diesel scrappage, traffic reduction and a shift to sustainable modes.

London Assembly Environment Committee – Conservative group

C12.20 The Conservative group of the London Assembly Environment Committee disagrees with the response from the Environment Committee. They support the original ULEZ in central London, but do not believe the air quality benefits of expansion would outweigh the costs to the economy and small businesses. They propose more targeted action at hotspots such as Heathrow Airport as an alternative.

London Assembly Environment Committee – UKIP group

C12.21 The UKIP group of the London Assembly Environment Committee supports a central London ULEZ in 2020. They would support a Heathrow ULEZ in 2023 and a potential ban on diesel in central London and near Heathrow if sufficient notice were given. They oppose calls to devolve VED revenue to London.

Redbridge Liberal Democrats

C12.22 The Redbridge Liberal Democrats support the proposals but have concerns about the ULEZ boundary; they believe it should cover the North Circular Road as current proposals would concentrate traffic on this route and increase pollution in outer London boroughs. They think the current proposals are shifting the pollution problem to outer London.

Richmond and Twickenham Green Party

C12.23 The Richmond and Twickenham Green Party supports a London-wide ULEZ for all vehicles that should be implemented within the current Mayoralty.

Rotherhithe and Surrey Docks Green Party

C12.24 The Rotherhithe and Surrey Docks Green Party supports efforts to clean up air in London but wishes to see the proposals expanded and accelerated. They also do not agree that vehicles should be allowed to pay to pollute.

Sian Berry AM

C12.25 Sian Berry AM strongly supports the LEZ and ULEZ proposals, but believes they need to go further as there are many areas with very high pollution levels outside the proposed boundary; it should be London-wide and be implemented sooner. If this is implemented in 2021 it puts the scheme at risk as it falls into a new Mayoral term. She thinks there has already been too much of a delay to meet safe limits and so it should be implemented as soon as possible.

Southwark Green Party

C12.26 The Southwark Green Party supports the changes to the LEZ and the expansion of the ULEZ but they feel it is crucial that the boundary is extended to include the whole of the inner London boroughs of Lewisham, Southwark and Lambeth. They are concerned that pollution on the South Circular Road will worsen as drivers avoid the ULEZ.

Streatham Wells Labour

C12.27 Streatham Wells Labour supports the changes to the LEZ and the ULEZ but would like to see them brought in earlier, and for the ULEZ boundary to be extended to the M25 so all boroughs are covered. They do not think cutting boroughs in half will help with behaviour change and compliance.

Sutton and Croydon Green Party

C12.28 The Sutton and Croydon Green Party supports a London-wide ULEZ for all vehicles.

Thurlow Park Ward Councillors

C12.29 The councillors representing the Thurlow Park Ward (London Borough of Lambeth) support the expansion of the ULEZ and the proposed changes to the LEZ. However, they are concerned that the zone does not include the South Circular Road itself which has poor air quality and that the zone does not include other known hotspots in the area. They are also concerned that air quality on the South Circular Road and roads to the south will deteriorate further as drivers use the road to avoid the charge. They call for the boundary to be expanded to cover all of London.

Waltham Forest and Redbridge Green Party

C12.30 The Waltham Forest and Redbridge Green Party supports the principles of the changes to the LEZ and the ULEZ but would like to see them implemented earlier (the ULEZ by 2020), and for the ULEZ boundary to cover all of London and for the standards to apply to all vehicles.

Waltham Forest Conservatives

- C12.31 The Waltham Forest Conservatives provided a lengthy response raising issues largely opposing the ULEZ proposals; this is due to the fact that they think it is a 'clumsy extension' and a solution appropriate to central London and not to Waltham Forest. Firstly they believe the extension is flawed, due to improvements in breaching the annual legal limits (five days to the third week of January this year) and that this improvement will have a 'knock-on effect' for outer London. They have concerns over whether the scheme will be successful, and if there will be enough people paying to maintain enforcement and infrastructure. They think freight transport will pass on increased costs to the consumer and reduce viability of affordable housing due to increased construction costs, and therefore other methods such as improving load utilisation are needed.
- C12.32 They think the payment structure is unfair where people with lower incomes pay disproportionately more of their income and may face no other transport options, and a Euro 6 driver can travel as much as they want but pay nothing even though they 'emit significantly higher levels of CO₂, NO_x, PM_{2.5} and PM₁₀ particulates'. They question whether it is fair that a moped pays the same as a Range Rover Sport when most particulate pollution comes from tyre and brake wear, and also electric vehicles contribute to this. They recommend that a consideration of the impact of buildings on the environment is also needed, as well as localised solutions. They state that residents need a thorough communications campaign.

Wandsworth Green Party

- C12.33 The Wandsworth Green Party supports proposals to improve air quality but wishes for the proposals to be implemented by the end of the Mayoral term and with a London-wide ULEZ. Their preference is for an integrated London-wide road user charging scheme.
- C12.34 They support a PM_{2.5} WHO standard, more traffic reduction and financial support for disabled people and more step-free access.

C13. Residents/community groups

Brentford Community Council

- C13.1 Brentford Community Council supports the changes to the LEZ and the expansion of the ULEZ but would like to see them both implemented earlier. They think the ULEZ should be expanded to include all of inner London and those areas of outer London which are close to main radial roads. They would also at a later date like it to be expanded to the M25. They also call for a higher ULEZ daily charge for non-compliant vehicles.

Coulsdon & Purley Road User Forum

- C13.2 The Coulsdon & Purley Road User Forum opposes the changes to the LEZ and the expansion of the ULEZ. They do not feel that the proposals have been properly costed and think that they will have an adverse impact on

London's economy as well as on businesses and residents. They call for the Blackwall Tunnel and the approach roads to be excluded due to the vital nature of the link and lack of viable alternatives.

Forest Hill Society

C13.3 The Forest Hill Society supports efforts to improve air quality but is concerned about the impact of the boundary and the potential for increased traffic and loss of access to services. They are concerned that the charge may be inequitable and think it should be replaced by a fairer system of road pricing. They finally request more information on enforcement.

London Forum of Amenity and Civic Societies

C13.4 The London Forum of Amenity and Civic Societies supports the proposals in the consultation. However they believe the ULEZ should be expanded to a wider area than the North and South Circular Roads.

C13.5 They also believe that light diesel vehicles built to the current Euro 6 standard (before changes to the standard to meet real-world driving emissions) should be subject to a ULEZ charge shortly after the introduction of the ULEZ.

Merton Community Groups

C13.6 Merton Community Groups urges the Mayor to extend the zone past the North and South Circular Roads to cover all London boroughs, due to higher rates of driving and car ownership in outer boroughs. They stress the urgency of this, stating legal limits are regularly broken in Merton, and the health implications of this.

Mortlake with East Sheen Society

C13.7 The Mortlake with East Sheen Society raises concerns about the use of the South Circular Road as the boundary, including the potential for increased traffic, pollution and rat-running. They are concerned about restricting access to Mortlake station and shops in the zone and state that there should be a discount for residents and a scrappage scheme.

The Finsbury Forum

C13.8 The Finsbury Forum supports a reduction in container vehicles due to their impact on roads and streets and proposes more use of rail freight.

The Kew Society

C13.9 The Kew Society supports measures to improve air quality, but raises several concerns about the impact of the North and South Circular Roads as a boundary on Kew and Richmond.

C13.10 They propose a faster implementation of the LEZ changes and an expansion of the ULEZ to cover the same area and they raise questions on the cost and nature of enforcement.

The St Marylebone Society

- C13.11 The St Marylebone Society supports the changes to the LEZ and the extension of the ULEZ but would like to see both proposals implemented sooner.
- C13.12 They consider that the key issue for central London is the increase in private hire and delivery vehicles. They think that the idling of private hire vehicles is also an issue that they feel is adding to pollution. They suggest the long-term solution is road pricing but they acknowledge the issues with implementation may well act as a long-term barrier to implementation. They suggest that the technology exists in app-based private hire and delivery vehicles to introduce a road pricing model for these types of vehicles easily and they call for consideration of this as an option.

C14. Taxi and private hire organisations

Licensed Taxi Drivers' Association (LTDA)

- C14.1 The LTDA supports the LEZ and ULEZ proposals, but would welcome a tightening of taxi and PHV standards to a minimum of '50/50' (any licensed vehicle must have a minimum of 50 miles in ZEC mode); this should also be applied to the GLA and local authority fleets. They support the exemption of taxis, due to the accessibility they provide for wheelchair users. They support regulations to cover PHVs due to concern over the growing numbers of these, though they think they should be required to make these commitments sooner, as the taxi trade is.

Uber

- C14.2 Uber supports the proposed changes to the LEZ and also the expansion of the ULEZ but calls for the date to be brought forward. They would like to see the expansion supported by an ambitious programme of EV charging infrastructure installation to make switching to ULEVs a financially viable option.

C15. Transport campaign groups

Better Streets for Enfield

- C15.1 Better Streets for Enfield would support a wider integrated road user charging scheme. They are concerned about the impact of the scheme on the North Circular Road and propose a London-wide extension and a ban on non-compliant vehicles.

Campaign for Better Transport

- C15.2 The Campaign for Better Transport supports the expansion of the ULEZ and tougher emissions standards for the LEZ. They would like to see both schemes implemented sooner and for the ULEZ to be London-wide

(although they accept the proposed boundary as an appropriate staging post to reach this). They support bringing forward the end of the sunset period in the CCZ but think a longer sunset period may be needed for residents in the newly expanded ULEZ area to make earlier implementation feasible.

- C15.3 They would like to see surplus ULEZ revenue being used to reinvest in better public transport and sustainable modes, to give people a real alternative to using the car, and to offset the trend of public transport users subsidising the Capital's roads.

Campaign for Better Transport London Group

- C15.4 The Campaign for Better Transport London Group supports drastic action in a short timescale.

Clean Air in London (CAL)

- C15.5 CAL supports more extensive/earlier schemes. They want to build on the existing plans by bringing the ULEZ expansion forward to 2020, by introducing one unified emissions-based charge by 2020, and banning diesel from the CCZ by 2020.

Disabled Motoring UK

- C15.6 Disabled Motoring UK supports efforts to improve air quality, but raises concerns around the potential impact on disabled drivers. They believe that the existing sunset period for disabled drivers should be lengthened and extended for all Blue Badge holders, with a discount applied afterwards.
- C15.7 They highlight the high cost of wheelchair accessible vehicles in particular.

Lewisham Cyclists

- C15.8 Lewisham Cyclists is strongly supportive of the proposals, but believes the zone should be extended to cover the whole of London; excluding the North and South Circular Roads could mean those working and living in these areas are adversely impacted by the proposals. They think that funds raised should be used to encourage the use of alternative non-polluting modes. They think reducing tailpipe emissions is not enough, and that a mode shift is needed.
- C15.9 They think to encourage this, walking and cycling must be made safer and more attractive, as well as there being public transport improvements and access to car sharing schemes. They think there needs to be incentivisation of mode shift for freight and servicing to use bikes (Hamburg and UPS case study). They think a focus is needed to clean up pollution hotspots in town centres and that the Mayor should not go ahead with river crossings unless they are for active modes or public transport.

London Cycling Campaign (LCC)

- C15.10 The LCC supports the proposals to expand the ULEZ, but urges the Mayor to go further and expand the ULEZ to cover the whole of London for all

vehicles and implement this before 2021. They provide links to previous ULEZ consultation responses in January 2015 and June 2017.

London Living Streets

C15.11 London Living Streets supports the changes to the LEZ. They support the expansion of the ULEZ but would like to see a larger expansion area, for it to be implemented sooner and for the charge for non-compliant vehicles to be higher. They would like the area to cover all 33 London boroughs, so those in outer London receive the same benefits as those in inner London. At the very least they would like to see the inclusion of the North and South Circular Roads.

RAC Foundation

C15.12 The RAC Foundation supports the Mayor's ambition to deliver clean air, but has two concerns with the new proposals. First, the pace at which the standards for heavy vehicles should be tightened needs to recognise the capacity of the market to respond with compliant vehicles, the constraints many businesses will face as a consequence of the vehicle leasing arrangements they hold, and the interaction between the ULEZ demands and other initiatives affecting vehicle specification such as the Direct Vision Standard. Secondly, expanding the ULEZ to the North/South Circular Roads boundary would affect a large number of low income households inside and outside the ULEZ.

Richmond Heathrow Campaign

C15.13 The Richmond Heathrow Campaign supports the proposed changes to the LEZ but believes these should be brought forward to October 2019. They support the expansion of the ULEZ but believe this should be brought forward to October 2020.

C15.14 The Richmond Heathrow Campaign highlights the potential air quality impact of the Heathrow expansion and points out that any expansion to Heathrow must be shown not to increase pollution.

Road Danger Reduction Forum

C15.15 The Road Danger Reduction Forum supports the proposals but believes they should be stronger and brought in before the end of the Mayoralty

Appendix D – Consultation questionnaire

Part 1: Proposals for a stronger Low Emission Zone (LEZ)

Q1. Do you support tougher vehicle emissions standards in the London-wide Low Emission Zone so that heavy vehicles must meet the Euro VI emissions standards London-wide?

Strongly support, Support, Neither support or oppose, Oppose, Strongly Oppose, No Opinion

Q2. Do you support the proposed implementation date of 26 October 2020 for the introduction of tougher Euro VI standards for heavy vehicles driving in the London-wide Low Emission Zone?

Support, oppose should be sooner, oppose should be later, neither, don't know

Q3. Do you support the proposed daily charges to be paid by owners of heavy vehicles that do not meet the required emissions standards at:

- £300 for those that do not meet Euro IV PM standards and;
- £100 for those that do not meet Euro VI NO_x and PM standards?

Support, oppose – charges too high, oppose – charges too low, neither, don't know

Part 2: Proposals for an expanded Ultra Low Emission Zone (ULEZ)

Q4. Do you support the principle of expanding the area where ULEZ emissions standards apply to light vehicles beyond central London?

Strongly support, Support, Neither support or oppose, Oppose, Strongly Oppose, No Opinion

Q5. We are proposing that the ULEZ emissions standards would apply to the inner London area below, roughly up to but not including the North and South Circulars roads. Do you support this proposed boundary?

Support, support an expansion but area should be larger, support an expansion but area should be smaller, oppose expansion, neither, don't know

*NB. If you wish to expand on any of the answers or suggest alternative boundaries please refer to the free text box section at the end.

Q6. Do you support the proposed implementation date of 25 October 2021 for the expansion of ULEZ to include light vehicles in inner London?

Support, oppose should be sooner, oppose should be later, neither, don't know

Q7. Do you support the proposed ULEZ daily charge to be paid by non-compliant owners of light vehicles of £12.50?

Support, oppose – the charges should be higher, oppose – the charges should be lower, neither, don't know

Part 3: Proposals for residents

Q8. Do you support bringing forward the end of the sunset period for residents in the Central London Congestion Charging zone from 7 April 2022 to 24 October 2021 so that all residents of inner London, including the Congestion Charging zone, pay the daily charge for non compliant vehicles from 25 October 2021?

Strongly support, Support, Neither support or oppose, Oppose, Strongly Oppose, No Opinion

Part 4: Proposals for penalty charges

Q9. Do you support increasing the penalty charge (PCN) level for non-payment of the ULEZ daily charge by owners of non-compliant light vehicles from £130 to £160 ?

Strongly support, Support, Neither support or oppose, Oppose, Strongly Oppose, No Opinion

Part 5: Other comments

Q10. If you have any further comments about the proposals, please write these in the box below.

Part 6: About you

Q11. What is your name?

Q12. What is your email address?

This is optional, but if you enter your email address then you will be able to return to edit your response at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation (for online respondents only)

Q13. What is your postcode (of your home or business)?

Q14. In what capacity are you responding to this consultation?

- As an individual
- As a taxi (black cab) driver/owner
- As a private hire vehicle (PHV)/minicab driver/operator/owner
- As a representative of a Government Organisation
- As a representative of a business
- As a representative of a community or voluntary organisation
- As a representative of a campaign group

Q15. If responding on behalf of an organisation, business or campaign group, please provide us with the name:

Q16. If you have selected 'taxi or PHV' in the question above, please indicate which of the following best describes you.

- Taxi driver – All London driver
- Taxi driver – Suburban driver
- Taxi vehicle owner
- Private hire operator
- Private hire driver
- Private hire vehicle owner

Q17. How did you hear about this consultation?

- Received an email from TfL

- Received a letter from TfL
- Read about the consultation on the TfL website
- Read about it in the press
- Through social media
- Other (please specify below)

Q18. What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

- Very good
- Good
- Acceptable
- Poor
- Very poor

Part 7: Travelling in London

Q19. What types of transport do you use in central London? (please tick all that apply)

- Vehicles for private use
- Vehicles for commercial use
- Taxi (black cab)
- PHV (minicab)
- Bus
- Bike
- Walk
- Tube

Q20. Do you drive in the Congestion Charge Zone, if so, how often?

- every day
- 3-6 days a week
- 1-2 days a week
- 1-2 days a month
- Less than once a month
- Never

Q21. Do you drive in the area within the North and South Circular Roads?

- every day
- 3-6 days a week
- 1-2 days a week
- 1-2 days a month
- Less than once a month
- Never

Part 8: Equality and Inclusion

Please tell us a bit about yourself in this section. All information will be kept confidential and used for analysis purposes only. We are asking these questions to ensure our consultations reach all sections of the community and to improve the effectiveness of the way we communicate with our customers. You do not have to provide any personal information if you don't want to.

Q22. Gender:

Male
Female
Trans female
Trans male
Gender Neutral
Prefer not to say

Q23. Ethnic Group:

Asian or Asian British – Bangladeshi
Asian or Asian British – Chinese
Asian or Asian British – Indian
Asian or Asian British – Other
Asian or Asian British – Pakistani
Black or Black British – African
Black or Black British – Caribbean
Black or Black British – Other
Mixed – Other
Mixed – White and Asian
Mixed – White and Black African
Mixed – White and Caribbean
Other Ethnic Group
Other Ethnic Group – Arab
Other Ethnic Group – Kurdish
Other Ethnic Group – Latin American
Other Ethnic Group – Turkish
Prefer not to say
White – British
White – Irish
White - Other

Q24. Age:

Under 15
16-20
21-25
26-30
31-35
36-40
41-45
46-50
51-55
56-60
61-65
66-70
71+
Prefer not to say

Q25. Sexual Orientation:

Bisexual Man
Bisexual Woman
Gay Man
Heterosexual Man
Heterosexual Woman
Lesbian
Other
Prefer not to say

Q26. Faith:

Buddhist
Christian
Hindu
Muslim
Sikh
Jewish
Other
None
Prefer not to say

Q27. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (Please include problems related to old age)

Yes, limited a lot
Yes, limited a little
No
Prefer not to say

Appendix E: Stakeholder meetings

Date	Event	Description	Stakeholder(s)
Jul-16			
15-Jul	Campaign for Better Transport meeting	Catch up to discuss current planning issues	Campaign for Better Transport
21-Jul	Confederation of Passenger Transport UK meeting	Regular meeting	Confederation of Passenger Transport
25-Jul	BVRLA		BVRLA
Aug-16			
10-Aug	Central Sub-regional panel	Regular meeting of borough officers and other reps for central London	Boroughs – central region
Sep-16			
01-Sep	SMMT	Meeting with Deputy Mayor	SMMT
01-Sep	London First	Regular catch up	London First
06-Sep	Living Streets stakeholder meeting	Mayor's Transport Strategy (MTS) meeting with Living Streets	Tom Platt, Head of Policy and Communications; Jeremy Leach, Chair, Living Streets Group
08-Sep	West Sub-regional panel		London borough officers
08-Sep	Freight Forum Steering Group		Freight Transport Association (FTA), Road Haulage Association (RHA), Chartered Institute of Logistics and Transport, DHL, Rail Freight Group, London First, London Chamber of Commerce and Industry (LCCI), Federation of Small Businesses, London Councils
11-Sep	Independent Disability Advisory Group (IDAG)	Presentation to TfL's advisory panel	IDAG

13-Sep	Community Transport briefing	Presentation to regular Community Transport meeting	Community Transport Group representatives
16-Sep	London Travelwatch (LTW)	Meeting to discuss the MTS – air quality added to the agenda	LTW
19-Sep	London City Airport meeting	Meeting to discuss the ULEZ expansion	London City Airport
20-Sep	SMMT Electric Vehicles Group	Plenary to discuss electric vehicles industry	Vehicle manufacturers, charge point manufacturers, operators, academics, government
22-Sep	Bus Network Seminar	Annual borough meeting to discuss bus issues	Borough leaders, officers, cabinet members
22-Sep	South Bank Employers' Group (SBEG)	Presentation at regular event for SBEG members	SBEG members
28-Sep	Recovery vehicles working group	Regular meeting with recovery vehicles industry	Vehicle recovery firms
29-Sep	LPHCA Road Show	Annual roadshow event	PHV operators and PHV trade associations
Oct-16			
18-Oct	Consultation event	Breakfast briefing for launch of the consultation	Representatives from health, environment, business, freight, voluntary, boroughs, and MPs
06-Oct	Central panel	Regular meeting of borough officers and other reps for central London	Boroughs – central region
11-Oct	London Councils engagement group	Meeting to discuss widening/tightening the ULEZ	Boroughs, London Councils
12-Oct	Florence Eshalomi AM and Leonie Cooper AM briefing	Meeting with Labour leads for transport and the	Assembly Members, researchers

		environment to discuss proposals	
12-Oct	Assembly researcher briefings	Meeting with Assembly researchers to discuss proposals	Assembly researchers
25-Oct	BVRLA	Policy discussion about issues affecting the vehicle rental sector	BVRLA
13-Oct	London First	London First meeting	London First
14-Oct	Federation of Small Businesses (FSB)	Air quality meeting	FSB
17-Oct	Greener by Design	Royal Aeronautical Society's annual environmental conference	
21-Oct	Freight Forum	Meeting, hosted by TfL's Commissioner, of around 60–80 stakeholders from across the freight and fleet industry, businesses and the boroughs	Freight industry including FTA, DHL, RHA; business including LCCI, London First, FSB; boroughs and the Department for Transport
Nov-16			
02-Nov	Freight in the City Expo	TfL is the headline sponsor, and we have speakers and exhibition space	Freight and business
05-Nov	Regent Street Motor Show	TfL/Go Ultra Low have a section at the event to explain the ULEZ	Freight stakeholders
09-Nov	GLA Mayor's Transport Strategy event	Presentation from the Deputy Mayor followed by thematic workshops – including on the environment	Boroughs, business, academic, transport, environmental, accessibility

09-Nov	Transport Association dinner	Presentation on air quality initiatives	Freight operators
10-Nov	Future of London events series	External event on the future of transport which forms part of the MTS series	Boroughs, business, academic, transport, environmental, accessibility
11-Nov	Sub-regional mobility forum	Presentation on air quality	Boroughs
24-Nov	CBI Air quality briefing	Presentation on air quality	CBI, Uber, Gatwick Airport, G4S, SMMT, Royal Mail, Siemens, UPS, O'Donovan Waste Disposal, Ford, The Crown Estate
29-Nov	London Councils ULEZ event	Additional London Councils event to discuss boroughs' issues with the ULEZ	Borough transport officers and councillors from Hackney, Islington, Camden, Southwark, Redbridge, Waltham Forest, RBKC, Wandsworth, and Richmond
Dec-16			
01-Dec	Business Improvement Districts policy briefing	Meeting with BID chief executives to discuss air quality	Cross River Partnership, Angel BID, New West End Company, Baker Street Quarter Partnership, Waterloo BID, Marble Arch BID, Better Bankside, Camden BID
03-Dec	TfL's Youth Participation Day	Annual youth event which featured a panel discussion on the future of London as well as a workshop event on promoting active travel	Representatives of youth organisations, TfL Youth Panel, UK Youth Parliament, Whizz-Kidz etc
05-Dec	PHV meeting	Air quality meeting with the PHV trade	PHV operators and PHV trade associations
06-Dec	BVRLA roundtable		BVRLA members, car clubs, operators, BT, RAC Foundation, FTA, Royal Mail, John Lewis
Jan-17			
19-Jan	LoCITY Working Group - HGV		Freight and fleet operators
25-Jan	LoCITY Working Group - Policy, Planning, Practice and Procurement		DfT, OLEV, boroughs, LCVP

26-Jan	ULEV Car Club Working Group		Car clubs, BVRLA, London Councils
Feb-17			
22-Feb	Institute of Directors		
28-Feb	SMMT Environment Policy Working Group		
Mar-17			
30-Mar	Greenpeace		
30-Mar	Prof Grigg, Doctors Against Diesel / QMU		
30-Mar	Client Earth		
Apr-17			
03-Apr	Borough cabinet member briefing		Transport and environment cabinet members
May-17			
03-May	GLA Fleet Managers meeting		LAS, Met Police, LFB, BTP
Jun-17			
09-Jun	British Transport Police		
16-Jun	Freight breakfast event		Freight and fleet operators
22-Jun	Borough officer technical briefing		Transport and environment officers
Jul-17			
24-Jul	MTS Freight Forum		Freight and fleet operators, business, boroughs
24-Jul	GMB Drivers Union		
Oct -17			
19-Oct	Canary Wharf Transport Forum		
Dec -17			
05-Dec	London Councils TEC leaders committee		
Jan -18			
12-Jan	Briefing session for freight, business and boroughs		Freight and fleet operators, business, boroughs
18-Jan	Meeting with London City Airport		
23-Jan	Meeting with Caroline Pidgeon		
Feb -18			
07-Feb	Greenwich Regeneration, Culture and Sport scrutiny		

	committee		
19-Feb	Borough officer briefing		
22-Feb	Borough members briefing		

Appendix F: Glossary of terms

Air pollutants: Generic term for substances emitted that have adverse effects on humans and the ecosystem.

ANPR (Automatic Number Plate Recognition): A system which uses cameras to identify vehicles from their licence plates.

ATF (Authorised Treatment Facility): A vehicle scrapyards. A full list of licensed facilities can be found at [https://www.gov.uk/government/publications/end-of-life-vehicles-
authorised-treatment-facilities-register](https://www.gov.uk/government/publications/end-of-life-vehicles-authorised-treatment-facilities-register)

Auto Pay: An account system that allows drivers to register with TfL and pay the Congestion Charge automatically each month via Direct Debit or a payment card.

BAME (black, Asian and minority ethnic): Used to refer to members of non-white communities in the UK.

CCMES (Mayor's Climate Change Mitigation and Energy Strategy): Statutory document outlining the Mayoral plans to reduce CO₂ emissions and encourage renewable energy.

CHP (combined heat and power): Local electricity generation that captures heat that would otherwise be wasted to provide useful thermal energy (such as steam or hot water) that can be used for space heating, cooling, domestic hot water and industrial processes.

CO₂ (carbon dioxide): Principal greenhouse gas related to climate change.

Congestion Charge (CC), Congestion Charging zone (CCZ): An area in central London where a daily charge (£11.50) applies to vehicles using the zone Monday to Friday, 07:00 to 18:00.

COPERT (calculation of air pollutant emissions from road transport): A software tool used worldwide to calculate air pollutant and greenhouse gas emissions from road transport. The development of COPERT is coordinated by the European Environment Agency (EEA), in the framework of the activities of the European Topic Centre on Air Pollution and Climate Change Mitigation. The European Commission's Joint Research Centre manages the scientific development of the model. COPERT has been developed for official road transport emissions inventory preparation in EEA member countries.

Cost of compliance: The cost to individuals, groups, businesses etc, to comply with a scheme by either paying the daily charge or upgrading vehicles to meet the required standard, along with the inconvenience and administration costs associated with the required response.

Cleaner Vehicle Retrofit Accreditation Scheme (CVRAS): The CVRAS is a certification scheme for manufacturers of retrofit emissions reduction technology that approves retrofit equipment for use in the LEZ, ULEZ and other Clean Air Zone cities.

Disabled tax class: A tax class for vehicles used by disabled people on higher rates of mobility allowance or a vehicle used to transport disabled people (disabled passenger vehicle) which exempts the vehicle from VED.

DVLA (Driver and Vehicle Licensing Agency): The Government agency that maintains the registration and licensing of drivers in Great Britain and the registration and licensing of vehicles, together with the collection and enforcement of Vehicle Excise Duty (VED) in the UK.

Economic and Business Impact Assessment (EBIA): Assessment that identifies and assesses the impacts on London's economy as a result of the proposals, the potential impacts on small and medium-sized enterprises (SMEs) and the monetised health benefits of the scheme.

Environmental Impact Assessment (EIA): Assessment that identifies and assesses the impacts of the proposals across a range of environmental issues including: air quality, noise, climate change, biodiversity, cultural heritage, landscape, townscape and the urban realm, material resources and wastes.

Equality Impact Assessment (EqIA): Assessment that identifies and assesses the impacts on equality issues, in particular those groups of people with protected characteristics or who are socio-economically disadvantaged.

Euro standards: Standards set by the European Union for the maximum emissions of air pollutants for new vehicles sold within EU member states. They range from Euro 1–6 for light vehicles, with 6 being the most recent and Euro I–VI for heavy vehicles.

EV (electric vehicle): Vehicle which uses an electric motor for propulsion. Includes both pure electric vehicles that run solely from batteries and plug-in hybrid electric vehicles that have an attached petrol or diesel engine to power the battery engine.

Greenhouse gas: Gases that absorb heat, contributing to climate change. The most significant of which is carbon dioxide (CO₂).

Health Impact Assessment (HIA): Assessment that identifies and assesses the impact of the proposals on the health and wellbeing of the population of Greater London and the ability to access health-related facilities and services. The assessment also addresses equality issues and therefore has some overlap with the EqIA.

HGV (heavy goods vehicle): Type of truck weighing more than 3.5 tonnes.

Historic vehicle tax class: A tax class for vehicles first registered over 40 years ago on a rolling date which exempts the vehicle from VED.

Integrated Impact Assessment (IIA): The IIA identifies and assesses the impacts and the likely effects on equality, the economy and the environment arising from the proposal.

LAEI (London Atmospheric Emissions Inventory): Database of emissions sources and information about rates of emissions for air pollutants emitted within and around London.

LEZ (Low Emission Zone): A charging zone across most of Greater London for vehicles, excluding cars, that do not meet emissions standards for PM₁₀.

LGV (light goods vehicle): Also known as light commercial vehicle; designed and constructed for the carriage of goods and weighing less than 3.5 tonnes.

Limit values: Legal maximum levels of atmospheric concentrations of air pollutants.

London Environment Strategy (LES): A statutory strategy containing a general assessment by the Mayor of the environment in Greater London as well as policies and proposals in relation to biodiversity, municipal waste management, climate change mitigation and energy, adaptation to climate change, air quality and ambient noise.

MAQS (Mayor's Air Quality Strategy): Statutory document outlining the Mayor's plans to reduce air pollution.

MTS (Mayor's Transport Strategy): A statutory document setting out the Mayor's intentions for London transport.

NO_x (nitrogen oxides): A generic term for nitrogen dioxide (NO₂) and nitrogen monoxide (NO), which can form NO₂ in the atmosphere. Euro standards set limits for vehicle emissions of NO_x.

NO₂ (nitrogen dioxide): A gas formed by combustion, identified as an air pollutant harmful to human health. The European limit values measure concentrations of NO₂ in the air.

OLEV (Office for Low Emission Vehicles): Cross-governmental office set up to support the development of the low emission vehicle sector.

PCN (Penalty Charge Notice): A charge issued for the violation of traffic regulations or non payment of a daily charge..

PHV (private hire vehicle): Licensed vehicles that are available for hire on a pre-booked basis. Also known as minicabs.

Plug-in hybrid: A vehicle which combines conventional internal combustion and electric propulsion with batteries charged from an electric power source.

PM (particulate matter): A mixture of various solid and liquid particles of various chemical compositions suspended in the air.

PM₁₀ (particulate matter less than 10 microns in diameter): Particulate matter that is harmful to human health and subject to EU limit values.

PM_{2.5} (particulate matter less than 2.5 microns in diameter): The smallest and most harmful form of particulate matter; also subject to EU limit values.

RDE (real-driving emissions): Test to measure the pollutants, such as NO_x and PM, emitted by vehicles while being driven on the road. RDE complements lab tests to help ensure that vehicles deliver anticipated emissions under real-world driving conditions.

Section 19 and section 22 permit: Organisations that provide transport on a 'not-for-profit' basis can apply to the Driver and Vehicle Standards Agency for permits under Section 19 or Section 22 of the Transport Act 1985. These permits allow the holder to operate transport services for hire or reward without the need for a full public service vehicle (PSV) operator's licence

Retrofitting vehicles: Adapting an older vehicle using technology, for example to reduce its emissions.

Sensitive locations: Sensitive locations (often called sensitive receptors) include, but are not limited to, hospitals, schools, daycare facilities, housing for the elderly and convalescent facilities. These are places where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, pesticides and other pollutants.

Showman's vehicles: Certain types of motorised vehicles used in the fairground industry. A precise legal definition is available in Section 62 of the Vehicle Excise and Registration Act 1994.

Taxi (black cab): A specialist vehicle licensed by TfL to ply for hire in London. Most taxis are licensed to carry five passengers although some are licensed to carry six.

VED (Vehicle Excise Duty): Annual charge levied for vehicles to use the public highway. Banded according to engine size or CO₂ emissions.

WHO (World Health Organization): An agency of the United Nations that is concerned with international public health

Zero emission capable vehicle (ZEC vehicles): A vehicle that is constructed to be capable of operating in zero emissions mode for at least part of its operating cycle. The zero emissions mode may be augmented by an internal combustion engine

configured to extend the driving range of the vehicle, either by propelling the wheels or by powering an on-board generator.

Appendix G: Public and business free text analysis

Code	Count
Theme: Principle of a ULEZ	5140
Support measures to improve air quality in London	1927
Support tougher measures on air quality than proposed	688
Support proposals for health reasons	563
Concern that public transport is not always a viable option within the proposed ULEZ expansion area	523
Support the principle of the ULEZ but have concerns about specific aspects	325
Concern that ULEZ removes the right / freedom to drive in London	214
Concern that emissions from manufacture of new vehicles outweigh emissions saved by low emission vehicles	157
Oppose ULEZ as emissions in London will reduce anyway due to the increase in use of low emission vehicles over time	151
Oppose the principle that air quality is a problem	78
Suggest public transport is sufficiently good option to discourage car driving in the ULEZ	61
Suggest focus of improvements should be within commercial fleets	57
Oppose ULEZ as traffic and associated air quality problems are a result of TfL schemes, e.g. road closures such as Bank junction scheme	52
Suggest providing data / evidence to support the proposals	41
Suggest that pollution should be tackled on a national scale (UK wide) rather than London only (not ULEZ specific)	38
Concern that active travel (e.g. cycling) is not always a viable option within the proposed ULEZ expansion area	37
Support reduction of car ownership in ULEZ zone	33
Suggest eventually turning ULEZ into a Zero Emissions Zone / only allowing EVs / hydrogen	32
Concern that proposals do not address air quality in the rest of the UK	28
Concern that ULEZ proposals will not address / reduce traffic congestion	28
Concern that strategies for development / population increase in London contradict principles of ULEZ	19
Suggest that modal shift away from private / individual vehicles is not feasible for local journeys outside central London	17
Oppose the principle that older vehicles are more polluting	12
Concern that pollution is airborne and so can't be contained or reduced in ULEZ zone	11
Suggest introducing a road pricing scheme	9
Concern that poor air quality will cause people to leave London if not addressed	8
Suggest that pollution has naturally increased with population growth	6
Concern that the proposals don't address the societal causes of congestion / pollution	5
Concern that ULEZ is not in line with proposals in the new London Plan (i.e. Waste Transfer Station within the North Circular)	5
Oppose the principle that air quality outside of central London is a problem	4
Concern that proposals have been watered down since first proposed	3
Request that an assessment of different options to improve air quality is undertaken	2
Suggest that focus on improving traffic-based pollution should be proportionate to each mode's contribution (e.g. 26% buses and coaches)	2
Support the focus on road traffic not aircraft / airports	2

Code	Count
Request to know what the air quality specific goals of ULEZ are and whether charges will be abolished when these are achieved	1
Suggest undertaking work to understand resident versus non-resident congestion / pollution contributions	1
Theme: Sources of Pollution	6558
Concern regarding existing air quality / pollution	1343
Concern regarding health impacts of poor air quality	1146
Concern regarding health impacts of poor air quality on children	692
Concern regarding pollution caused by taxis	495
Concern regarding pollution caused by buses	398
Concern regarding pollution caused by vehicles idling	283
Concern regarding pollution from non-transport sources, e.g. diesel generators, home energy efficiency, wood burners	201
Concern regarding pollution caused by poor road design / traffic management	192
Concern regarding pollution caused by planes / aircraft / helicopters over London	173
Concern regarding pollution caused by HGVs	172
Concern regarding pollution caused by congestion from cycle lanes	165
Concern regarding pollution caused by vans / commercial / delivery vehicles	129
Concern regarding pollution impact on houses and schools near to main roads	128
Concern regarding taxis idling at ranks	109
Concern regarding pollution from diesel vehicles	89
Concern regarding congestion and pollution from construction / road works	87
Concern regarding impacts of poor air quality on health of cyclists	69
Concern regarding pollution from London airports, i.e. Heathrow / City airport etc.	67
Concern regarding emissions from diesel trains	63
Concern regarding empty buses in London	54
Concern that Heathrow airport expansion is contrary to ULEZ	54
Concern regarding pollution caused by buses idling	52
Concern regarding pollution from cruise terminal in Greenwich	47
Concern regarding pollution caused by PHVs	43
Concern regarding health impacts of poor air quality on the elderly	38
Concern regarding growth of delivery vehicles and associated congestion / pollution	35
Concern regarding pollution caused by coaches	33
Concern regarding pollution caused by maritime vehicles (boats, river freight)	33
Concern regarding pollution caused by private / individual vehicles	23
Concern that business causes more pollution than individuals	20
Concern regarding pollution caused by motorcycles	19
Concern regarding pollution coming from other countries	14
Concern regarding health impacts of poor air quality on deprived communities (health inequality)	13
Concern regarding pollution from PHVs circling / swarming	10
Concern about particulate pollution from tyres and brakes	9
Concern regarding air quality on board public transport	8
Concern regarding pollution caused by idling trains	8
Concern regarding ozone emissions from EVs and hybrid vehicles	7
Concern that proposed Silvertown Tunnel will increase pollution around Royal Docks	7
Concern that new retail developments centred around / encouraging car use	5

Code	Count
contradicts ULEZ	
Suggest that vehicle emissions are not a primary cause of poor air quality	5
Concern over pollution caused by hybrid vehicles	4
Concern regarding long-term health impacts of construction of HS2 terminus at Euston	4
Concern regarding planning permission granted for developments that increase pollution e.g. HGV superhub in Cricklewood	3
Concern about exposure to air pollution when waiting for bus at bus stops	2
Concern regarding pollution from Hydrogen Sulphide	2
Concern regarding pollution from the M25	2
Concern over congestion and pollution caused by level crossings	1
Concern that lack of parking facilities increases pollution as vehicles drive around looking for spaces	1
Concern that most pollution comes from vehicles that haven't been / skip being serviced	1
Theme: Timescale	2399
Suggest earlier implementation of proposals (non-specific, e.g. implement asap)	1590
Suggest later implementation of proposals (non-specific)	346
Suggest later compliance date for private / individual vehicles	215
Suggest ULEZ should have happened long ago	64
Suggest ULEZ is extended London-wide sooner than planned	33
Suggest phasing out diesel vehicles gradually	32
Suggest that proposals should be implemented this Mayoral term	24
Suggest later compliance date for businesses	21
Suggest later compliance date for vans / commercial / delivery vehicles	15
Suggest ULEZ in central zone is implemented sooner than planned	12
Suggest later compliance date for EURO 6 diesel vehicles (e.g. 10 years after manufacture (2015))	11
Suggest earlier implementation for private / individual vehicles	10
Suggest proposals are implemented before Brexit to ensure EU Air Quality Directives are upheld	7
Suggest an earlier compliance date for buses	5
Suggest later compliance date for EURO 6 vehicles	5
Suggest earlier compliance date for businesses	2
Suggest earlier compliance date for vans / commercial / delivery vehicles	2
Suggest later compliance date for motorcycles	2
Suggest later compliance date for EURO 5 vehicles	1
Suggest proposals are implemented after Brexit following potential changes to emissions standards	1
Suggest proposals are implemented before Brexit to ensure EU funding for implementation	1
Theme: LEZ Timescales	42
Suggest earlier implementation date for London-wide LEZ for HGVs	13
Concern regarding lack of an option to oppose charging entirely	12
Suggest later implementation date for London-wide LEZ for HGVs	10
Support proposed implementation date of 26 October 2020 for London-wide LEZ for HGVs	5
Oppose proposed implementation date of 26 October 2020 for London-wide LEZ for	2

Code	Count
HGVs	
Theme: ULEZ Timescales	192
Concern regarding lack of an option to oppose question entirely	50
Suggest later compliance date for all vehicles in North / South Circular zone	48
Suggest earlier compliance date for all vehicles in North / South Circular zone	30
Suggest later compliance date for diesel vehicles in North / South Circular zone	30
Oppose proposed extension date of 25 October 2021 to North / South Circular roads boundary for ULEZ	22
Suggest earlier compliance date for diesel vehicles in North / South Circular zone	6
Support proposed extension date of 25 October 2021 to North / South Circular roads boundary for ULEZ	4
Suggest later compliance date for vehicles that meet MOT standards but not ULEZ EURO standards	2
Theme: Vehicle emission standards	2873
Concern that central government has promoted diesel vehicles in recent years, and is now penalising them	1621
Suggest tested emissions data (i.e. MOT) should be used to set standards instead of EURO standards, which do not reflect real world conditions	221
Concern regarding enforcement and monitoring of standards	135
Concern about manufacturers falsifying vehicle emissions	100
Suggest that TfL provide long-term timetable for emission standards to allow for future planning of vehicle choices	80
Concern over proposals as all current road vehicles were sold in compliance with government standards	78
Concern regarding practicalities of electric vehicles (EVs), i.e. battery range, running cables across pavements	74
Concern that pollution created by electricity generation / minerals in batteries means EVs are not clean technology	70
Suggest foreign vehicles should comply with ULEZ / LEZ	43
Suggest EURO 5 diesel vehicles should not be subject to ULEZ	40
Suggest phased introduction of ULEZ standards	36
Support stricter emission standards for diesel vehicles	36
Suggest that EURO 5 and 6 diesel vehicles are better for the environment than petrol vehicles	26
Suggest petrol and diesel vehicles should comply to same emission standards	25
Suggest issuing guidance on how to retrofit vehicles to meet ULEZ standards	24
Oppose adopting EURO emissions standards following Brexit	23
Concern that ULEZ emissions standards are too stringent too soon	16
Suggest introducing a platform to report visibly polluting vehicles	16
Suggest EURO 6 diesel vehicles should not be subject to ULEZ	14
Suggest that ULEZ needs greater emphasis on reducing particulate matter	13
Suggest that car manufacturers are already making significant progress to keep up with EU rules and the proposals demand too much from them	12
Suggest that ULEZ standards are based on vehicle age	12
Suggest all EURO 6 vehicles should not be subject to ULEZ	10
Suggest stricter emission standards than EURO 6	10
Suggest ULEZ standard for all light vehicles should be EURO 5	10
Support EURO 6 diesel vehicles being subject to ULEZ	10

Code	Count
Suggest all light vehicles must be EURO 6 compliant as the minimum	9
Suggest all vehicles must be EURO 4 compliant as the minimum	9
Concern that EURO standards won't apply after Brexit	8
Concern regarding lack of guidance for owners of non-compliant vehicles	7
Concern that ULEZ checker does not provide accurate / sufficient information	7
Suggest stricter emissions standards for motorcycles	7
Concern about emissions from 'zero emissions capable' vehicles not using this capability (i.e. running diesel engine)	6
Suggest phased introduction of EURO 6 standards for petrol vehicles	6
Suggest ULEZ standard for all light vehicles should be EURO 4	6
Concern regarding reduced air quality legislation after Brexit	5
Suggest phased introduction of EURO 6 standards for diesel vehicles	5
Suggest emissions standards increase over time	4
Suggest that TfL clarifies how long EURO 6 diesel cars will remain compliant in London	4
Concern that lower tax vehicle rates for diesel vehicles is attractive / encourages use	3
Request for more information on emissions impact of EURO standards	3
Suggest EURO 3 petrol cars and small vans should not be subject to ULEZ	3
Suggest public transport should be subject to the same emissions standards as private and commercial vehicles	3
Suggest stricter emission standards for car hire / car clubs	3
Suggest ULEZ standard for motorcycles should be EURO 4	3
Support stricter emission standards for petrol vehicles	3
Concern that EURO 6 vehicles registered before 2014 will be non-compliant	2
Concern that some vehicles (such as recovery vehicles) have long lifespans and replacement is unfeasible	2
Suggest higher standards than EURO 3 for vans (i.e. Euro 5)	2
Suggest publishing results of independent emissions tests to inform future car purchase	2
Concern that EU air quality targets are unachievable	1
Concern that retrofitting coaches to meet ULEZ standards is not possible / financially viable	1
Suggest following the French 1 to 10 system of classifying vehicles in terms of emissions	1
Suggest lower emissions standards in proposed ULEZ expansion area, e.g. Euro 5, than in central ULEZ zone	1
Suggest particulate matter ULEZ standard based on World Health Organisation (WHO) guidelines	1
Suggest that EURO 4 standard for petrol vehicles won't take many vehicles off the road	1
Theme: LEZ emission standards	33
Suggest stricter emissions standards for HGVs London-wide	30
Suggest EURO V for HGVs instead of proposed EURO VI	2
Theme: Charge levels	927
Oppose daily charge, suggest variable rate per mile instead	166
Suggest higher charges for all vehicles	158
Suggest lower charges (non-specific)	83
Suggest charge should be means tested / related to income	47

Code	Count
Suggest higher charge for vans / commercial / delivery vehicles	47
Suggest lower charge for motorcycles	44
Oppose all charges and fines for all vehicles	41
Suggest phased introduction of charges which increase over time	41
Suggest large businesses are charged more than small businesses	26
Suggest higher charge for diesel vehicles	25
Suggest higher charge for single occupancy vehicles	18
Suggest tougher penalties (e.g. license points, community service, jail) rather than / in addition to fines for non-compliant vehicles	18
Suggest charges are based on engine size, in CCs	17
Suggest charge should be based on size of vehicle	16
Suggest higher charges for non-residents (i.e. commuters)	14
Suggest charge for all diesel vehicles	13
Suggest higher charges for households with more than one car	13
Suggest a zoning approach, where charges increase incrementally as vehicles approach central London	12
Suggest variable charge that is higher on days / at times when pollution is higher (similar to surge pricing)	12
Suggest higher charge for foreign vehicles	9
Suggest higher charges for private / individual vehicles	9
Suggest motorcycles should be considered a separate category of vehicle	9
Concern regarding difference between high charges for motorists and zero charges for cyclists	7
Suggest that the scheme should be 'revenue neutral' i.e. that increased charges for diesel cars are met by reduced charges / incentives for petrol vehicles	7
Suggest higher charge for more expensive vehicles	6
Suggest lower charges for coaches	6
Suggest charges for driving any motorised vehicle in London (due to particulate pollution, e.g. brake, tyre dust)	5
Suggest increasing charges once implemented if the current charge is not effective in improving air quality	5
Suggest lower charge for diesel vehicles manufactured after 2009	5
Suggest lower charge for petrol vehicles	5
Suggest that charging levels should increase with instances of non-compliance	5
Oppose daily charge, suggest an hourly charge instead	4
Suggest lower charge for vans / commercial / delivery vehicles	4
Suggest that charges should be based on fuel consumption of vehicle, instead of mileage	4
Suggest higher charge for motorcycles	3
Suggest that ULEZ charge for commercial vehicles should be paid by the haulage company / operators rather than drivers themselves	3
Concern regarding different charge levels for vehicles with the same engine	2
Suggest distinction in charging between different motorcycle engine sizes and types	2
Suggest higher charges for vehicles making through journeys in ULEZ zone	2
Suggest lower initial charge that increases gradually based on the frequency of entering the ULEZ zone	2
Suggest that different EURO standards should pay different charges	2
Concern that LEZ / ULEZ charges will increase over time	1

Code	Count
Suggest a flat charge for all vehicle classifications	1
Suggest charging every time a vehicle enters the ULEZ zone, not daily	1
Suggest higher charge for more polluting vehicles	1
Suggest higher charges for HGVs entering London from outside the M25	1
Suggest higher charges in pollution hotspots	1
Suggest lower charge for EURO 5 EEV (energy efficient vehicles)	1
Suggest that individuals and business should only be charged if operating more than two non-compliant vehicles	1
Suggest that LEZ / ULEZ charges should be frozen for 5 years	1
Suggest waiving ULEZ charge on public holidays when public transport doesn't run	1
Theme: LEZ charge levels	69
Suggest higher charges for HGVs	31
Concern regarding lack of an option to oppose charging entirely	12
Suggest lower charges for HGVs	7
Support proposed charge of £100 for HGVs that do not meet Euro VI	6
Support proposed charge of £300 for HGVs that do not meet Euro IV	6
Oppose proposed charge of £300 for HGVs that do not meet Euro IV	4
Oppose proposed charge of £100 for HGVs that do not meet Euro VI	3
Theme: ULEZ charge levels	277
Oppose proposed charge of £12.50 for light vehicles	98
Oppose proposed charge of £12.50 for motorcycles	72
Concern regarding lack of an option to oppose charging entirely	58
Suggest lower charges for light vehicles	27
Suggest higher charges for light vehicles	9
Support proposed charge of £12.50 for light vehicles	9
Suggest lower charges for private / individual vehicles	3
Suggest annual charge rather than daily charge for light vehicles	1
Suggest increasing LEZ emission standards for vans / minibuses from Euro 3 to Euro 4 / Euro 5	1
Theme: LEZ boundary	99
Suggest LEZ boundary extends further (e.g. to M25)	60
Support London-wide LEZ for HGVs	32
Concern regarding increased traffic and pollution near to LEZ boundary	2
Suggest LEZ for HGVs extends to North / South Circular roads only	2
Suggest LEZ should cover whole of Richmond and Kingston boroughs	2
Concern regarding increased parking near to LEZ boundary	1
Theme: ULEZ boundary principle	484
Oppose the principle of expanding the ULEZ beyond central London	376
Support the principle of expanding the ULEZ beyond central London	107
Suggest that roads with relatively high traffic volume should be exempt from ULEZ	1
Theme: ULEZ boundary suggestions	3619
Concern regarding increased traffic and pollution near to North / South Circular road boundary	503
Suggest ULEZ should be London-wide (M25 boundary) for all vehicles	431
Suggest inclusion of North / South Circular roads themselves in ULEZ	396
Oppose expanding ULEZ up to North / South Circular roads	363

Code	Count
Suggest ULEZ should be London-wide (non-specific boundary) for all vehicles	239
Concern regarding increased traffic and pollution on North / South Circular roads	237
Suggest extending ULEZ boundary further than North / South Circular roads (non-specific)	214
Concern over concentration of schools and playgrounds near North / South Circular roads, where traffic / pollution will increase	170
Suggest adjustment to the boundary (specific location / suggestion)	163
Oppose exclusion of Great West Road (A4) to Hogarth roundabout from ULEZ North / South Circular boundary	138
Suggest extending ULEZ boundary further south than South Circular road	114
Concern that proposal will split communities / boroughs in two (e.g. Redbridge, Richmond)	86
Support expanding ULEZ up to North / South Circular roads	79
Concern that North / South Circular boundary is arbitrary and does not correlate with pollution levels and / or population density	77
Suggest inclusion of South Circular road itself in ULEZ	71
Suggest ULEZ should be London-wide (LEZ boundary) for all vehicles	58
Suggest ULEZ should be UK-wide	42
Suggest expanding ULEZ zone to pollution hotspots beyond North / South Circular roads (e.g. Brent Cross)	31
Suggest inclusion of M25 itself within ULEZ zone	25
Suggest inclusion of North Circular road itself in ULEZ	24
Concern regarding increased parking near to ULEZ boundary	23
Suggest ULEZ zone is extended along heavily polluted routes outside of North / South Circular zone (e.g. Heathrow corridor)	21
Concern about rat-running if North / South Circular roads are included in ULEZ	20
Oppose inclusion of North / South Circular roads themselves in ULEZ	16
Suggest ULEZ zone includes all inner London boroughs	9
Suggest ULEZ zone should be expanded in phases (gradual expansion)	9
Concern that people will drive to ULEZ boundary, park and take public transport	7
Suggest expanding the zone to the original Congestion Charge area (i.e. western expansion zone)	7
Suggest that ULEZ boundaries should be defined by access to public transport	7
Suggest ULEZ boundary does not extend as far north as the North Circular road	7
Concern regarding lack of an option to oppose charging entirely	6
Concern regarding negative impact on businesses near the ULEZ boundary	6
Suggest expanding ULEZ zone only to pollution hotspots within North / South Circular roads (i.e. make the boundary smaller)	5
Oppose expansion of ULEZ zone for petrol vehicles (EURO 4)	2
Oppose extending the ULEZ zone for petrol vehicles owned by residents	2
Suggest expanding boundary as far as London Underground network	2
Suggest ULEZ boundary does not extend as far south as the South Circular road	2
Suggest ULEZ only covers areas / roads with highest pollution levels	2
Concern that decision to use the North / South Circular roads as the boundary is politically influenced	1
Suggest that differing policies apply to different sections of the South / North Circular Roads as some parts are residential roads and some are high volume main roads	1
Suggest that sections of the M25 should not be included	1

Code	Count
Suggest that ULEZ zone is expanded to North / South Circular roads for diesel vehicles only	1
Suggest ULEZ does not apply for private / individual vehicles outside central zone, but does apply for all other vehicles	1
Theme: Residents sunset period	81
Oppose bringing forward end of sunset period for central London residents	55
Support bringing forward end of sunset period for central London residents	26
Theme: Discounts, exemptions and other sunsets	3584
Suggest exemption for motorcycles	983
Oppose exemption for taxis (black cabs)	745
Suggest sunset period for residents of North / South Circular zone	129
Oppose exemption for buses	128
Support exemption for historic vehicles	123
Suggest exemption for private / individual vehicles	116
Suggest exemption for light vehicles	111
Suggest exemption for all London residents	73
Suggest historic vehicles threshold should be more recent than 1973	72
Oppose any exemptions	65
Suggest exemption for residents in North / South Circular zone	53
Suggest exemption for campervans / motorhomes	48
Oppose exemption for PHVs	45
Suggest exemption for disabled class vehicles	45
Suggest sunset period for all London residents	45
Suggest discount for all London residents	43
Oppose exemption for historic vehicles	42
Suggest discount for residents in North / South Circular zone	42
Suggest exemption for blue badge holders	37
Suggest exemption for the elderly / pensioners	36
Oppose exemption for vans / commercial / delivery vehicles	35
Oppose exemption for motorcycles	32
Suggest exemption for small businesses	32
Suggest an annual "grace" allowance for non-compliant vehicles, when no charge applies	29
Suggest exemption for emergency service vehicles	29
Suggest exemption for emergency service / key workers	28
Suggest exemption for residents in central ULEZ zone	26
Suggest exemption for petrol vehicles (i.e. ULEZ only applies to diesel vehicles)	23
Support exemption for taxis (black cabs)	21
Suggest exemption for people traveling by car to hospital / for medical reasons	20
Suggest a rolling date for exemption of historic vehicles	19
Suggest exemption / discount for LPG vehicles	19
Suggest charity / volunteering vehicles should be exempt (i.e. community minibus)	18
Suggest discount for residents in central ULEZ zone remains	18
Suggest exemption for all disabled people, not just those receiving Personal Independence Payment	12
Concern regarding abuse of exemptions, e.g. residents, disabled	11
Oppose exemption for showmans' vehicles	10

Code	Count
Suggest discount for historic vehicles	10
Suggest discounts at certain times of the day (e.g. early morning / late evening)	10
Support exemption for buses	9
Oppose any resident discount / exemption	8
Suggest discount for disabled class vehicles	8
Suggest discount for residents who live near but just outside the ULEZ zone	8
Suggest sunset period for commercial vehicles	8
Suggest sunset period for residents who live near but just outside the ULEZ zone	8
Suggest that certain through-routes should be exempt, e.g. Blackwall tunnel	8
Oppose sunset period for residents of ULEZ zone	7
Suggest exemption for PHVs	7
Suggest exemption for residents who live near but just outside the ULEZ zone	7
Suggest exemption for vans / commercial / delivery vehicles	7
Suggest sunset period for residents of ULEZ area with non-compliant diesel cars	7
Oppose exemption for disabled class vehicles	6
Suggest a sunset period for those with on low incomes	6
Suggest exemption of historic vehicles on weekends	6
Oppose exemptions for coaches	5
Suggest exemption for commercial vehicles travelling at night	5
Suggest sunset period for disabled class vehicles should be longer	5
Oppose exemption for blue badge holders	4
Oppose exemptions for construction vehicles (e.g. mobile cranes)	4
Suggest exemption for private vehicles with at least one passenger	4
Suggest sunset period for residents stays fixed once it is announced	4
Concern that classic Routemaster buses used for hire purposes will not be exempt	3
Oppose exemption for specialist vehicles	3
Oppose sunset period for disabled class vehicles	3
Suggest exemption for military vehicles	3
Suggest exemption for night and shift workers	3
Suggest exemption for vehicles below a certain annual mileage	3
Concern that discounts and exemptions are complicated / confusing	2
Concern that the sunset period has been revised since publication of Labour Mayoral manifesto	2
Suggest discount for blue badge holders	2
Suggest discount for motorhomes / campervans	2
Suggest exemption for short, key access roads from North / South circular roads into ULEZ zone	2
Suggest exemption for single car households	2
Suggest non-compliant disabled class vehicles are replaced with compliant vehicles rather than be granted exemptions	2
Suggest sunset period for disabled class vehicles should be shorter	2
Suggest sunset period for residents should be longer	2
Oppose charges being tax deductible	1
Oppose discount for disabled class vehicles	1
Oppose exemption for emergency service vehicles	1
Oppose exemption for military vehicles	1

Code	Count
Suggest a discount for taxis rather than exemption	1
Suggest all exemptions are reviewed regularly	1
Suggest allowing a sunset period for residents of North / South Circular zone who only own one car	1
Suggest automatic exemption for residents via DVLA to avoid unnecessary bureaucratic delays	1
Suggest discount for disabled access taxis	1
Suggest discount for non-compliant hybrid vehicles	1
Suggest exemption for all L-Category Vehicles (incorporating motorcycles, quadbikes, micro cars)	1
Suggest exemption for breakdown / recovery vehicles	1
Suggest exemption for construction vehicles	1
Suggest exemption for EURO 6 vehicles registered after April 2015	1
Suggest exemption for hydrogen vehicles	1
Suggest exemption for low emission mini buses	1
Suggest exemption for stoves used on canal boats	1
Suggest exemption for trips that take place inside a borough boundary	1
Suggest exemption for very light vehicles (i.e. Smart Car)	1
Suggest exemptions for people driving within the ULEZ area in exceptional circumstances, e.g. road closures due to roadworks	1
Suggest historic vehicle definition should be in line with insurance industry guidelines	1
Suggest that cars that utilise AdBlue should be exempt	1
Support exemption for electric vehicles (EVs)	1
Support sunset period for disabled class vehicles	1
Theme: Financial impacts	9830
Concern regarding cost of upgrading to a compliant vehicle	1803
Concern that ULEZ is a revenue-raising scheme for TfL / government, rather than a scheme to improve air quality	1152
Concern that ULEZ will increase cost of living	859
Oppose ULEZ as it is a revenue-raising scheme for TfL / government, rather than a scheme to improve air quality	697
Concern that ULEZ is a tax	640
Concern regarding impact on small businesses	635
Oppose ULEZ as it is a tax	633
Concern regarding motorists' costs without this additional charge	541
Concern regarding impact on people who rely on cars or vans for work	480
Concern regarding impact on businesses	390
Concern that charging allows richer people to continue polluting	381
Concern regarding negative impact on value of non-compliant second-hand vehicles (i.e. depreciation)	346
Concern that commercial / delivery drivers will pass on costs to consumers	305
Concern regarding negative impact on London's economy	252
Concern regarding impact on people who rely on vehicles (unspecified purpose)	141
Concern over high cost of public transport	130
Concern regarding impact of ULEZ on commercial / delivery drivers and companies	72
Concern regarding the impact of the proposals on job security in London	72
Concern that businesses will leave London as a result of costs	70

Code	Count
Concern that ULEZ will make car ownership costs prohibitive	65
Concern that charges for vehicle users in London (e.g. Congestion Charge and T-Charge) are already high enough	35
Concern regarding cost to hauliers of upgrading to compliant HGVs	25
Suggest that the health economic benefits (e.g. cost to NHS and employers) outweigh other costs	21
Concern over increased parking charges for diesel vehicles	16
Concern regarding impact of reduced car access to local shops within expanded ULEZ zone	14
Support positive impacts on London's economy	12
Concern that ULEZ will increase the cost of public transport	11
Concern that house / land prices will increase around the ULEZ boundary	10
Concern over cost of electric vehicles (EVs)	6
Concern that cost of replacing public service vehicles will be passed onto consumers	6
Concern about fines from European Commission if UK doesn't comply with EU air quality laws	2
Concern that forcing people to upgrade their vehicle is a method to boost the economy	2
Concern that price of compliant vehicles will increase significantly due to high demand	2
Concern that proposals will increase the price of fuel	2
Concern regarding impact of proposals on refuse collection companies / fleets / vehicles	1
Concern that house / land prices will fall in the ULEZ zone	1
Theme: Other Impacts	8,104
Concern regarding disproportionate impact on poorer people / those on low incomes	2,260
Concern regarding disproportionate impact on private / individual cars (motorists)	899
Concern that proposals will not be effective in improving air quality	465
Concern regarding disproportionate impact on residents living in proposed ULEZ zone	345
Concern regarding disproportionate impact on motorcycles	336
Concern regarding disproportionate impact on families	318
Concern about environmental impact of scrapping useable vehicles	288
Concern regarding disproportionate impact on diesel cars	276
Concern that residents near the boundary will be charged for local / short journeys (e.g. shopping, school run)	269
Concern regarding impact on elderly population / drivers	238
Concern regarding disproportionate impact on infrequent car users who do low mileage	230
Concern regarding impact on owners of older vehicles	226
Concern that the proposals will displace poorer residents from London	197
Concern regarding impact on disabled population (inc. disabled drivers)	192
Concern that public transport network will be unable to cope with a potential shift from car users after implementation of ULEZ	145
Concern that residents near the boundary will be charged for driving out of ULEZ zone to leave London (local journeys)	125
Concern regarding disproportionate impact on owners of relatively new diesel cars that do not meet ULEZ standards	106
Concern that proposals will negatively impact quality of life	95

Code	Count
Concern regarding disproportionate impact on people who own historic vehicles	91
Concern that vehicle miles and pollution will increase as drivers detour to avoid North / South Circular ULEZ zone	89
Concern regarding impact on people with disabled dependents / carers	85
Concern that proposals will shift pollution elsewhere	79
Concern regarding disproportionate impact on people who rely on motorcycles for commuting	71
Concern regarding impact on people (patients / visitors) having to drive to hospitals within the ULEZ zone	70
Concern regarding disproportionate impact on night and shift workers	60
Concern regarding the impact on people who live outside London or visit	56
Concern regarding increased pollution in outer London	55
Concern over lack of public transport links in south London	51
Suggest implementation of the ULEZ will result in fewer Labour voters	36
Concern that cycling or walking to work is not a viable option for many people within the ULEZ area	31
Concern that supply of electricity won't meet increased demand from EVs	27
Concern that the proposals will displace middle class residents from London	25
Concern that proposals will negatively affect tourism in London	24
Concern regarding increase in CO2 emissions from increased petrol vehicle use	20
Concern regarding impact on coach operators	17
Concern residents will leave London as a result of charges	14
Concern that charging motorcycles will make users switch onto cars and thus cause more pollution	14
Concern that companies will absorb the costs of charging without replacing their vehicles / fleet	14
Concern proposals may lead to an increase in fly tipping where waste centres are located close to, but within, the ULEZ zone	13
Concern that ULEZ charge will stop people using motorcycles for leisure	13
Concern that historical significance of older vehicles may be lost (i.e. future classic cars)	9
Concern regarding different emission standards in different parts of the UK	8
Concern that proposals will lead to increase in crime as more vulnerable people are on the streets	8
Concern proposals will discourage social visits (friends, family, elderly) within the proposed expansion area	7
Concern regarding disproportionate impact on HGVs	7
Concern regarding disproportionate impact on older petrol vehicles	7
Concern regarding disproportionate impact on people who rely on motorcycles for work	7
Concern that more people will drive unregistered / uninsured cars to avoid being tracked	7
Concern that proposals will encourage rat-running as people avoid main roads with ANPR infrastructure	7
Concern about health impacts of being exposed to other public transport users	6
Concern regarding disproportionate impact on coaches	5
Concern regarding disproportionate impact on drivers who must enter ULEZ zone to use the Blackwall Tunnel	5
Concern about impact on emergency service vehicles (including private)	4

Code	Count
Concern regarding disproportionate impact on owners non-compliant vehicles purchased on lease /finance agreements	4
Concern that encouraging cycling has increased the number of inexperienced cyclists	4
Concern regarding impact on recreational car use	3
Concern regarding increased pollution and congestion on M25	3
Request that TfL provide details of predicted of impact of ULEZ on traffic flow	3
Concern about impact on vehicle fleets used for driver training (e.g. buses)	2
Concern about long-term health effects of driving an electric vehicle (driving over an electric field)	2
Concern bus operators may cut routes if bus are denied exemption from ULEZ	2
Concern for residents who have been placed in council flats within proposed ULEZ area, and have no ability to move	2
Concern non-compliant buses will be shifted to other areas outside of central London	2
Concern regarding impact of increased pedestrianisation on people unable to walk / cycle long distances	2
Concern that businesses will replace each HGV with several light vehicles, increasing congestion and pollution	2
Concern that non-compliant vehicles will be sold abroad and worsen air quality there	2
Concern that proposals will encourage people to pave gardens / green space to gain free parking / EV charging	2
Concern that the North and South Circular roads meet at the Woolwich ferry and lead to more motorists using the ferry to cross the river	2
Concern ULEZ non-compliant vehicles will be sold outside London, worsening air quality in those locations	2
Suggest that proposals will not have a negative impact on poorer residents because most London drivers tend to be richer	2
Concern regarding disproportionate impact on owners of relatively new non-compliant vehicles	1
Concern regarding disproportionate impact on PHV drivers	1
Concern regarding disproportionate impact on voluntary sector	1
Concern that EVs weigh more than ICE vehicles and will result in the roads deteriorating more quickly	1
Concern that increased costs for construction industry raise cost of affordable housing	1
Concern that increased dependence on public transport will give transport unions too much power	1
Concern that increased HGV traffic near the ULEZ boundary will hinder the regeneration of areas such as Wembley Park	1
Concern that proposals will force people to use public transport against their will	1
Concern the scheme could lead to multiple car ownership (e.g. one ULEZ compliant vehicle, one for long journeys)	1
Suggest that proposals are designed to create revenue for vehicle manufacturers	1
Support for proposals as air quality outside of London will improve because vehicles travelling to London will need to be compliant	1
Theme: Implmentation	960
Suggest ULEZ charge should only apply to vehicles purchased / registered / manufactured after ULEZ legislation implemented	140
Oppose 24/7 ULEZ	114
Concern over disparities between outer and inner London public transport	76

Code	Count
Concern over cost of implementing proposals	60
Concern regarding current availability of compliant low emission vehicles	52
Concern about political influences on the scheme / lobbyists	47
Suggest roadside on-street emissions checks are carried out to fine drivers / remove illegal vehicles from roads	40
Concern regarding availability of compliant low emission vans / commercial / delivery vehicles	38
Suggest inclusion of aircraft in ULEZ	30
Concern that costs of proposals outweigh the benefits	28
Request for clarification if resident's vehicle will be charged if parked in the ULEZ zone	23
Concern that proposals will exacerbate any negative impact on the economy caused by Brexit	22
Concern that residents will be charged if their vehicle is parked in the ULEZ zone	22
Concern about a lack of joined up policy making, i.e. introduction of ULEZ without supporting proposals, such as developing a network of EV charging infrastructure	20
Suggest ULEZ operates on weekdays only	19
Concern regarding long term operating costs of charging infrastructure (e.g. ANPR cameras, payment facilities)	16
Suggest setting up a system to pay ULEZ automatically	14
Suggest active monitoring of air pollution levels to provide evidence for further ULEZ expansion	13
Concern regarding enforcement of uninsured / unregistered vehicles	12
Suggest buy-in and support for ULEZ is important from relevant organisations (e.g. NHS, private hospitals, borough councils etc.)	12
Suggest inclusion of river traffic in ULEZ	11
Concern about enforcing charges for embassy vehicles	9
Suggest ULEZ charges are paid monthly rather than daily charge	9
Suggest ULEZ operates during same time period as Congestion Charge	9
Support 24/7 ULEZ	9
Concern regarding availability of compliant low emission HGVs	8
Suggest penalising those that remove diesel particulate filters (DPFs) from vehicles	8
Suggest extension to North / South Circular zone depends on success of central ULEZ zone	7
Suggest that effective communication of the scheme is important	7
Suggest implementing the zone for commercial vehicles / public transport on an initial trial basis	6
Suggest introducing visitor passes for non-compliant vehicles	6
Request information about the location of infrastructure / cameras to detect residents driving in the scheme area	5
Suggest an annual pass for residents	5
Suggest that non-compliant vehicles are seized and destroyed	5
Suggest ULEZ customer service / information should be better than that for Congestion Charge	5
Request that TfL provide evidence of impact of T-Charge	4
Suggest inclusion of trains in ULEZ	4
Suggest that red routes throughout London should be included in the ULEZ / LEZ	4
Concern regarding current availability of compliant disabled class vehicles	3

Code	Count
Concern that introduction of ULEZ charge creates confusing two-tier charging boundaries	3
Suggest a system to allow drivers to check if they have entered the ULEZ zone	3
Suggest an extended charge payment period (e.g. 48 hours) for non-compliance	3
Request for more information regarding compliant HGVs, buses, coaches	2
Suggest abolishing Dartford Crossing toll if ULEZ is implemented	2
Suggest different charges for travelling in to London (into ULEZ) and out of London (out of ULEZ)	2
Suggest offering several days worth of daily charge in one transaction, to mitigate against forgetting to pay the charge	2
Suggest that non-compliant vehicles are clamped	2
Suggest ULEZ operates at peak times only	2
Concern about conservation areas not allowing EV charging points	1
Concern about potential for incorrectly issued charges	1
Concern regarding TfL's use of private firms to enforce / collect penalty charges	1
Oppose retrofitting non-compliant vehicles	1
Request for information regarding number of vehicles registered within planned ULEZ expansion area	1
Request further information about the cost of implementing the proposals	1
Suggest compliant vehicles should not need to pay to renew their exemption every year	1
Suggest pre-payment system that only allows vehicles access to ULEZ zone after payment of charges	1
Suggest providing adequate signage setting out the ULEZ boundary	1
Suggest publishing data on corporate payments to encourage heavily-polluting fleets to convert to low emission vehicles	1
Suggest renaming the ULEZ, as actual emissions level will not be "ultra low"	1
Suggest that charges are considered "after tax income", so that they cannot be claimed as a business expense	1
Suggest that proposals are temporary until air quality improves	1
Suggest that ULEZ does not apply at weekends for London residents	1
Suggest using SMS / mobile alerts to remind people to pay if they have driven in the zone	1
Suggest waiving ULEZ charge on school holidays when there is less congestion	1
Support tougher penalties (e.g. basic fines, withdrawal of licenses) for commercial vehicle operators with non-compliant vehicles	1
Theme: Financial support / revenue	1,940
Suggest financial assistance to switch to compliant vehicles (i.e. a scrappage scheme)	1111
Suggest that revenue raised from charging should be used for projects to improve air quality, e.g. low emission technologies, tree planting, public transport	214
Request to know what revenue generated will be used for	172
Suggest providing financial assistance for shift to EVs, e.g. subsidised vehicle purchase, free parking, free charging points etc.	164
Suggest a vehicle retrofit fund	60
Concern that financial assistance from scrappage scheme will be insufficient to buy compliant vehicles	48
Suggest financial assistance for commercial drivers / haulage companies to replace their vehicles	41

Code	Count
Suggest that revenue raised from charging should be used to improve cycling provision	26
Oppose financial assistance to switch to compliant vehicles (i.e. a scrappage scheme)	20
Suggest that revenue raised from charging should be used to fund a scrappage scheme	19
Suggest that revenue raised from charging should be spent on health service, NHS (improving health of those affected by emissions)	17
Suggest financial assistance for disabled residents	15
Suggest that revenue raised from charging should be used to improve roads	12
Concern about the terms of diesel scrappage deals	6
Suggest financial assistance for small businesses to purchase compliant vehicles	5
Suggest that financial assistance for replacing vehicles will be offset by reduction in healthcare costs	3
Suggest that revenue raised from charging should be spent on developing affordable housing in London	2
Suggest those who can't afford to replace their car are provided with a free public transport pass for one year	2
Suggest asking wealthier residents to contribute to an air quality fund	1
Suggest that revenue raised from charging should be used for projects to enforce traffic regulations	1
Suggest using revenue to subsidise taxes of those who don't use private vehicles	1
Theme: PCN Level	127
Oppose increase in PCN for non-payment of ULEZ charge	60
Suggest lower PCN level for non-payment of ULEZ charge	26
Suggest higher PCN level for non-payment of ULEZ charge	13
Suggest longer period before issuing PCN	11
Support increase in PCN for non-payment of ULEZ charge	9
Suggest that PCN should start lower and increase based on number of offences	7
Oppose any / all PCNs	1
Theme: Vehicle bans	1,255
Suggest non-compliant vehicles are banned from ULEZ zone rather than charged	278
Suggest more car-free zones (i.e. pedestrian / cyclists only)	162
Ban diesel vehicles (non-specific)	113
Ban internal combustion engine vehicles (i.e. non-EVs) in central London	63
Ban deliveries during the daytime	52
Ban internal combustion engine vehicles (i.e. non-EVs) London-wide	50
Ban all vehicles from central London	46
Ban private / individual vehicles from central London	43
Ban HGVs from central London	36
Ban odd / even number plates on certain days	33
Ban the manufacture of diesel vehicles	31
Ban diesel vehicles from central London	30
Ban diesel vehicles London-wide	26
Suggest banning / stricter controls on 4x4 vehicles	26
Ban diesel buses from London	25
Ban HGVs from central London during peak hours	23

Code	Count
Ban HGVs from central London during the daytime	20
Ban HGVs London-wide during the daytime	16
Ban deliveries during peak hours	15
Ban private / individual vehicles London-wide	15
Ban vehicles with large engines over a certain size (e.g. 1300cc for diesel)	15
Ban HGVs London-wide	14
Ban private / individual vehicles from central London during peak hours	14
Ban buses	10
Ban diesel vehicles from North / South Circular zone	8
Ban HGVs London-wide during peak hours	8
Ban historic vehicles	8
Ban vehicles on days where a high level of pollution is forecast / detected	8
Ban petrol vehicles (non-specific)	7
Ban the manufacture of all internal combustion engine vehicles (i.e. non-EVs)	7
Suggest non-compliant vehicles purchased / registered / manufactured after ULEZ legislation is implemented should be banned from ULEZ zone	7
Ban manufacture / sale of ULEZ non-compliant vehicles	6
Ban non-residents from ULEZ zone	6
Ban private / individual vehicles from North / South Circular zone	6
Ban all vehicles from Central London during the daytime	3
Ban HGVs from North / South Circular zone	3
Ban private / individual vehicles from central London on weekdays	3
Ban coaches from central London during peak hours	2
Ban ICE delivery vehicles	2
Ban quadbikes	2
Concern that proposals will be superseded when vehicles are eventually banned from central London	2
Suggest banning HGVs from all but arterial roads	2
Ban all vehicles from central London except disabled class vehicles	1
Ban all vehicles from central London except emergency services vehicles	1
Ban diesel commercial vehicles from London	1
Ban diesel vehicles from London during the day	1
Ban motorcycles (non-specific)	1
Ban the manufacture of petrol vehicles	1
Ban vehicles from companies / organisations which operate more than a given number of non-compliant vehicles	1
Suggest banning vehicles when they reach a certain age	1
Suggest more bus / taxi only routes	1
Theme: Alternative suggestions	1,387
Suggest improving traffic flow e.g. increase road space, reduce roadworks, reduce bus lanes, relocate cycle lanes, synchronise traffic lights	740
Suggest introducing incentives for low emission transport (i.e. low emission vehicles / active travel / public transport) instead of charges	277
Oppose investment in cycle lanes as they cause congestion and pollution	145
Oppose 20mph speed limits as they cause congestion and pollution	60
Suggest improving road surfaces	51
Suggest improving car parking facilities and availability	44

Code	Count
Suggest higher tax on fuel instead of ULEZ	18
Suggest higher tax for purchasing non-compliant vehicles instead of ULEZ	12
Suggest providing more motorcycle infrastructure (e.g. secure parking bays, training)	12
Suggest that a MOT test should be sufficient to assess emissions; extra charges are unnecessary	11
Suggest general traffic should be allowed to use Cycle Superhighways outside the peak hours	2
Suggest improving car parking facilities and availability for disabled people	2
Suggest that TfL undertakes an annual review of ULEZ scheme	2
Suggest banning jobseekers or unemployed people from owning vehicles	1
Suggest compensation scheme for individuals who get stuck in traffic on London roads	1
Suggest creating more arterial roads through London to reduce journey times to / from the Channel tunnel / ferries	1
Suggest expanding London to disperse vehicles / pollution over a wider area	1
Suggest fuel duty should be the only tax on emissions	1
Suggest improving North / South Circular roads (i.e. increase capacity)	1
Suggest increasing council tax to provide funding for alternative policies to reduce congestion and improve air quality	1
Suggest reducing import taxes on new vehicles to make them more affordable	1
Suggest reintroducing 4-star grade petrol, to replace unleaded, to decrease pollution	1
Suggest that a motor specialist (e.g. Jeremy Clarkson) is in charge of plans	1
Suggest that areas of poor air quality should be dealt with locally, not London-wide	1
Theme: Suggested supporting policy	8,729
Suggest encouraging motorcycles as they are a solution to the air quality problem and are being disproportionately punished	726
Suggest improving public transport services	717
Suggest improving provision for electric vehicles (EVs), e.g. more EV charging infrastructure	550
Suggest improving provision for cycling, e.g. more cycle lanes, cycle parking, extension of cycle hire	487
Support for low emission (i.e. electric) buses	398
Suggest making public transport cheaper	390
Suggest stricter enforcement for idling vehicles (e.g. fines)	296
Suggest introducing incentives for low emission transport (i.e. low emission vehicles / active travel / public transport) as well as charges	294
Support policies that promote electric vehicles (EVs)	281
Suggest improving availability of low emission vehicles (i.e. work with manufacturers)	235
Suggest introducing more green infrastructure (i.e. planting more trees, plants, green walls)	209
Support for low emission public transport, i.e. electric trains, trams	193
Suggest penalising manufacturers of polluting vehicles	187
Support policies that promote active travel (i.e. walking and cycling)	176
Suggest addressing pollution from non-transport sources, e.g. diesel generators, home energy efficiency, wood burners	175
Suggest reducing general traffic levels in London	159
Suggest state-owned fleets (e.g. TfL buses, rubbish lorries, emergency services) switch to low or zero emission vehicles	135

Code	Count
Suggest stricter controls around schools and hospitals	129
Suggest improving education about the dangers of poor air quality	111
Suggest improving pedestrian environment, e.g. pedestrianisation, wider footways provision	103
Suggest more innovative changes to reduce delivery traffic, e.g. consolidation centres, retiming deliveries	96
Suggest promoting sustainable transport to schools, e.g. walking, bus, lift sharing	88
Suggest addressing noise pollution as well as air pollution	85
Suggest improving shared mobility measures, e.g. car clubs, car sharing, shared taxi schemes	81
Suggest providing clear information / guidance on compliant and non-compliant vehicles before introducing ULEZ charge	81
Suggest learning from international examples	77
Suggest making parking more difficult, e.g. higher charges, fewer spaces, more enforcement, less permits given out	68
Suggest improving public transport service in North / South Circular zone is necessary before extending ULEZ zone	67
Suggest exploring the use of technology to reduce pollution	66
Suggest public campaign to raise awareness of negative effects of idling	65
Suggest limiting London's population and economic growth	54
Support for low emission (i.e. electric) HGVs	52
Support for low emission vans / commercial / delivery vehicles	52
Suggest fitting air filters to vehicles to reduce their emissions	48
Suggest improving air quality on transport infrastructure (i.e. installing air filters in Underground tunnels, buses)	48
Suggest general assistance and guidance provided by government to those who need to change cars	47
Suggest reducing the number of buses	46
Suggest disabled access to public transport is improved (e.g. step free access)	45
Oppose Heathrow airport expansion	43
Suggest local and transparent monitoring and public displays of pollution levels following implementation of ULEZ	42
Suggest car-free days	41
Suggest stricter MOT / vehicle maintenance standards	36
Suggest more park and ride schemes	35
Suggest stricter controls on HGVs in London (non-specific)	35
Suggest more effective enforcement of current traffic laws	31
Suggest investing in alternative fuel research	29
Support for hybrid vehicles	28
Suggest making public transport free	27
Suggest stricter controls on boat / canal boat emissions	27
Suggest stricter controls on construction	27
Suggest encouraging and providing for increased use of hydrogen vehicles	26
Suggest reducing the number of flights / planes / aircraft over London	23
Suggest more rail freight	21
Suggest improving availability of low emission vans / commercial / delivery vehicles	20
Suggest introducing more school buses to reduce traffic to schools	19
Suggest further measures to reduce pollution and congestion in residential areas	18

Code	Count
Suggest utilising the river / canals for freight	18
Suggest more businesses relocate out of London to reduce traffic levels	17
Suggest stronger measures to reduce number of short car journeys	17
Suggest encouraging alternative electric vehicles e.g. electric bikes	16
Suggest encouraging flexible working to reduce commuting levels (e.g. working from home)	16
Suggest higher tax on diesel than petrol	16
Suggest public transport is available 24 hours a day e.g. Overground	16
Suggest lowering speed limits	15
Suggest more conservation and protection of green spaces in London (e.g. National Park City)	15
Suggest penalising households that own multiple vehicles / restricting them to one vehicle	15
Suggest greater use of cycle freight for deliveries (e.g. cargo bikes, e-bikes)	14
Suggest stricter enforcement / prevention of rat-running	14
Suggest encouraging LPG vehicles	13
Suggest improving orbital public transport links, e.g. along route of North and South Circular roads	13
Suggest that minimum / average wage needs to increase when ULEZ charge is implemented	13
Suggest encouraging start / stop engine technology	12
Suggest increasing police presence to improve safety of walking and cycling	12
Oppose Silvertown tunnel	10
Suggest 20mph speed limit London-wide	10
Suggest improving education about cycling / cycle training	10
Suggest tougher measures and control over foreign vehicles	10
Suggest allowing motorcycles to use bus lanes	9
Suggest increasing online delivery charges to reduce number of delivery vehicles	9
Suggest public transport is nationalised	9
Support low emission motorcycles	9
Support retrofitting non-compliant vehicles so that they meet ULEZ standards	9
Suggest improving South Circular road (i.e. increase capacity)	8
Suggest making changes to junction designs to reduce time idling	8
Suggest more thorough air quality monitoring at all schools	8
Suggest introducing a formalised road user hierarchy prioritising non-motorised modes (e.g. pedestrians & cyclists)	7
Suggest introducing a quota for number of vehicles permitted to drive within in London	7
Suggest limiting the number of / charging cruise ships docking in London	7
Suggest more bus lanes	7
Suggest reducing off peak bus frequency / size	7
Suggest that autonomous / driverless vehicles should be introduced to London ASAP	7
Suggest utilising the river for people / passenger services	7
Ban smoking in public places	6
Suggest allowing EVs to use bus lanes	6
Suggest introducing a London-wide coach parking scheme to accommodate visiting vehicles	6

Code	Count
Suggest that central government should be taking action on air quality	6
Suggest that each London borough is required to produce and implement an air quality strategy	6
Suggest that serial offenders who avoid paying charges / penalties should receive points on their license	6
Ban smoking in London (i.e. in homes and public)	5
Suggest 20mph speed limit London-wide (excluding North / South Circular roads)	5
Suggest creating more 20 mph zones in residential areas	5
Suggest ensuring that vehicles are disposed of in an environmentally-friendly manner	5
Suggest making shorter wait times at pedestrian crossings at highly polluted junctions	5
Suggest more low emission buses in outer London	5
Suggest more 'smart' pedestrian crossings to reduce traffic build-up and pollution from pedestrian misuse	5
Suggest promoting biofuels	5
Suggest reducing number of tourist buses	5
Suggest restricting all traffic apart from delivery vehicles	5
Suggest that production of diesel and petrol vehicles is phased out earlier than 2040	5
Suggest a vehicle weight-based penalty system	4
Suggest banning people from paving over their front gardens	4
Suggest bus stops are set in pavement space so stopped buses do not block traffic	4
Suggest improving availability of low emission HGVs	4
Suggest incentives (i.e. affordable housing) for people to relocate close to their work place, to reduce the need to commute	4
Suggest penalties (fines / prosecution) for those who modify vehicles to evade ULEZ standards	4
Suggest reducing the distance needed to travel to work, shops, services through improved urban planning	4
Suggest that London residents are provided with masks / respirators to use outdoors	4
Suggest that scope of ULEZ should be expanded to include other pollutants (e.g. Benzene, PM, Ozone)	4
Suggest the use of horse and cart for transportation	4
Suggest using on-shore electric power at Greenwich cruise terminal	4
Suggest developing freight tube / Underground deliveries in London	3
Suggest encouraging other UK airports to expand, not Heathrow	3
Suggest lower tax for electric vehicles (EVs) and higher for larger / more polluting vehicles	3
Suggest more car-free new housing developments	3
Suggest reducing / rationalising the number of bus stops in London	3
Suggest residents living within ULEZ zone offered a free parking permit	3
Suggest that more restrictions should be placed on HGVs using minor /residential roads	3
Suggest that public sector and public figures such as MPs, civil servants should lead by example and not use cars	3
Suggest that TfL pursue a bottom-up approach to policy making	3
Oppose road building schemes / increasing road capacity as it will induce demand and lead to increased congestion	2
Suggest limiting urban sprawl by pursuing high density housing / zoning policy	2
Suggest a wayfinding app to highlight low pollution routes	2

Code	Count
Suggest banning procurement of private / individual vehicles through government for civil servants	2
Suggest community-based initiatives aimed at reducing emissions	2
Suggest higher tax on company cars	2
Suggest introducing higher tax on fuel in addition to ULEZ	2
Suggest mandating the use of AdBlue / "clean" diesel	2
Suggest more car-free river crossing facilities	2
Suggest offering public transport 365 days a year if ULEZ implemented	2
Suggest promoting sustainable energy sources for transport	2
Suggest putting a tax on the purchase of non-compliant second hand vehicles	2
Suggest restrictions on HGVs size / weight in London	2
Suggest reworking the boundaries of TfL travel zones	2
Suggest road tunnels built on strategic routes to alleviate pollution	2
Suggest sat navs should direct drivers to use the M25 rather than the North / South Circulars	2
Suggest that selection criteria for freedom passes or discounted Oyster cards should be broadened	2
Suggest that the City of London should be compelled to divest any financial interest in fossil fuels	2
Suggest that vehicle tax should increase with vehicle age to stimulate replacement of older models	2
Suggested that buses should not use roads when out of service (returning to depot), but park at start or end of route	2
Support for low emission refuse collection vehicles	2
Suggest a construction tax on vehicles included in planning consents	1
Suggest all rental cars within North / South Circular area should be ULEZ compliant	1
Suggest creation of a new out of town airport to reduce aircraft passing over London	1
Suggest encouraging prams and buggies that place child higher up than road level	1
Suggest expanding fixed route cab journeys (Black Buses)	1
Suggest government relocates out of London to reduce traffic levels	1
Suggest greater use of mopeds / motorcycles for deliveries	1
Suggest implementing CPZs to enforce parking restrictions close to the ULEZ boundary	1
Suggest non-compliant vehicles are labelled, to shame drivers and allow cyclists and pedestrians to avoid polluting vehicles	1
Suggest penalising oil / diesel suppliers for providing "dirty" fuel	1
Suggest providing guidance for vulnerable groups on how to minimise pollution inhalation	1
Suggest raising fares on TfL services to fund purchase of a low emission fleet	1
Suggest reducing council tax to make up for increased costs	1
Suggest relocating bus garages away from residential areas	1
Suggest removing / adjusting anti-terrorist barriers on bridges in London	1
Suggest that car dealers should be required to inform buyers which cars are ULEZ non-compliant	1
Suggest that foreign cars undergo an exhaust modification to direct emissions away from pavements	1
Suggest that politicians should pay a £500 charge to drive within the ULEZ area	1
Suggest that public transport is free on days when high levels of pollution are forecast	1

Code	Count
Suggest waiving stamp duty for sellers moving out of ULEZ area due to pollution	1
Theme: Comment on Congestion Charge	302
Concern that the Congestion Charge has been ineffective	109
Oppose Congestion Charge	65
Suggest extension to Congestion Charge zone	35
Request to know what Congestion Charge revenue is being used for	25
Support western extension of Congestion Charge zone	13
Oppose the continual increase in level of the Congestion Charge	9
Suggest increase in Congestion Charge	9
Suggest Congestion Charge should operate 24/7	8
Oppose western extension of Congestion Charge zone	6
Request that TfL provide evidence of impact of Congestion Charge on congestion in central London	5
Suggest that Congestion Charge should apply to all vehicles, including hybrid and electric vehicles	5
Suggest that Congestion Charge should not apply to low emission vehicles, such as hybrid and electric vehicles	3
Concern that ULEZ is a step towards expanding the Congestion Charge zone	2
Suggest introducing the Congestion Charge at weekends	2
Suggest removing the need for EVs to register for Congestion Charge exemption	2
Oppose Congestion Charge exemption for PHVs	1
Suggest that 90% CCZ resident discount should be abolished	1
Suggest that the Congestion Charge is abolished once ULEZ is implemented	1
Suggest undertaking a review of the vehicle exemptions for the Congestion Charge Zone	1
Theme: Comment on taxi and private hire	825
Support for low emission (e.g. electric) taxis	320
Suggest reducing / capping PHV numbers	75
Ban diesel taxis	65
Suggest reducing / capping taxi numbers	50
Suggest financial assistance for taxi drivers to purchase / retrofit zero emission / compliant vehicles	41
Support for low emission (e.g. electric) PHVs	40
Suggest reducing / capping Uber numbers	34
Suggest an earlier compliance date for taxis	30
Suggest that taxis and private hire vehicles should have to follow the same regulations	22
Ban taxis (black cabs)	21
Ban Uber	15
Concern regarding pollution from taxis driving around to look for fares	15
Support Uber (concern about the revoking of Uber's licence)	14
Suggest regulation of PHVs is improved	13
Suggest higher charges for PHVs	11
Concern that restricting shared taxi services (e.g. Uber, Lyft) will have negative impact on air quality	8
Suggest introducing a sunset period for taxis	6
Suggest regulation of Uber is improved	6

Code	Count
Concern regarding cost of upgrading to a ULEZ compliant taxi	5
Suggest that only wheelchair accessible taxis / taxis carrying disabled passengers should be exempt	5
Suggest applying a per fare charge / levy to taxi journeys	4
Suggest earlier compliance date for PHVs	4
Concern regarding limited availability of low emission / ULEZ compliant taxis	3
Concern over preferential treatment of taxis over PHVs	2
Request for more detail on proposals for low emission taxis	2
Suggest phased introduction of charges for taxis and PHVs	2
Suggest pricing taxi and PHV licences based on emissions	2
Suggest that all taxis should be booked via apps or wait in taxi ranks, not make on street pick ups	2
Ban PHVs from central London	1
Suggest exemption for currently-registered taxis until the end of their service life	1
Suggest introducing a maximum 3 year lifespan for taxis	1
Suggest shorter than proposed age limit on diesel London taxis (black cabs)	1
Suggest that only wheelchair accessible PHVs / PHVs carrying disabled passengers should be exempt	1
Suggest that owners of PHVs should pay the charge, rather than those who hire them	1
Suggest that taxis that qualify for the scrappage scheme should not be exempt from charges	1
Suggest working with taxi trade to plan operation of roads more effectively	1
Theme: Consultation	1,415
Suggest consultation information is biased or questions are leading	268
Concern that it is not possible to oppose some of the questions	178
Concern that TfL will not listen to consultation and proceed regardless	165
Concern that consultation information / questionnaire is not clear / confusingly worded	146
Request that more details are included in consultation information	146
Concern regarding data presented	115
Concern that general public are not sufficiently aware of ULEZ / LEZ proposals	87
Concern that statistics on air quality health impacts are not accurate	69
Concern that proposals are complicated / confusing	39
Concern that the number of people responding to the consultation is not representative of the number that will be affected	22
Concern that proposals do not give enough acknowledgement to CO2 emissions	21
Request for evidence from TfL that diesel is worse than petrol for pollution (diesel does not produce as much CO2)	21
Suggest that consultation period should be extended	14
Request that TfL provide evidence of impact of ULEZ on residents and local businesses	11
Support for the consultation process	11
Concern that printed consultations were not received until long after the consultation started	9
Concern that consultation can only be accessed online	8
Concern that supporting information does not contain economic analysis	7
Concern that the web links in the consultation do not work	7
Concern that consultation did not feature a question on potential scrappage schemes	6

Code	Count
Concern that the matter of exemptions for taxis was not included in the consultation	6
Concern that there is no mention of motorcycles in questionnaire	5
Oppose public consultation process, suggest expert advice instead	5
Suggest consultation should only be open to motorists	5
Suggest that TfL provides robust evidence on potential improvements to air quality made by ULEZ	5
Concern that air pollution data in consultation is out of date and underestimates air pollution	4
Suggest that implementation of ULEZ is subject to a public vote rather than consultation	4
Concern regarding lack of detail in consultation about charges for PHVs	3
Concern that questionnaire asks for too many personal details at the end	3
Concern that survey was too time consuming	3
Concern regarding conduct of staff delivering consultation information	2
Concern that disproportionate representation of users of certain modes of transport in consultation responses could bias results	2
Concern that the consultation web page was difficult to find	2
Suggest a social equality impact assessment is carried out and published before proposals go ahead	2
Suggest consulting more with businesses on transport planning	2
Suggest that results of consultation should be transparent and published	2
Suggest ULEZ proposals are subject to an independent evaluation	2
Suggest undertaking a further public consultation on the level of public transport measures needed to support ULEZ	2
Concern that consultation did not feature a question on 24-hour operation of the ULEZ	1
Concern that consultation material did not have enough detail regarding buses and taxis	1
Suggest a judicial review of ULEZ, if implemented	1
Suggest changing 'oppose - should be higher' answers to 'support - should be higher'	1
Suggest linking relevant policy and background information to survey questions in questionnaire	1
Suggest undertaking a further consultation on a London wide ULEZ	1
Theme: Out of scope comments	1,524
Criticism of Mayor of London / Sadiq Khan / TfL	769
Suggest that London should prioritise other issues / problems, e.g. crime, housing, public health	102
Suggest stricter controls on cyclists e.g. licence / compulsory insurance / helmet / hi-vis / behaviour	74
Concern that cycle lanes in London are underused	68
Concern regarding congestion in London more generally	63
Suggest more enforcement of traffic infringements e.g. speeding / vehicle noise	56
Concern for personal safety on public transport	53
Concern regarding motorcycle thefts / attacks on riders (including use of acid)	37
Suggest measures put in place to tackle nuisance performance vehicles e.g. noise, revving, acceleration, speeding	23
Support pedestrianisation of Oxford street	23
Suggest cyclists should be charged for using the roads	22

Code	Count
Suggest improving housing provision / reducing housing costs in London	20
Suggest providing more river crossings for road traffic	19
Concern about Brexit	17
Oppose high density housing development	16
Oppose pedestrianisation of Oxford Street	11
Concern for personal safety while walking in London (fear of crime / anti social behaviour)	10
Concern regarding pollution from chemicals, e.g. fluoride in water, chemtrails	9
Concern regarding removal of mature trees	9
Suggest penalising cyclists who choose not to use cycle lanes	9
Concern about driver behaviour in central London	7
Suggest stricter controls on and enforcement of motorcyclists' behaviour	7
Concern that local government / London boroughs are corrupt	6
Suggest that London's streets are made cleaner	6
Concern about cost of accessing medical services in London	5
Concern regarding road danger for children	5
Concern that traffic congestion in London may delay emergency response vehicles	5
Concern about high fuel prices	4
Concern about number of traffic cameras in London	4
Concern regarding potential development on green belt land	4
Concern regarding taxi driver behaviour	4
Suggest implementing measures to reduce use of plastics	4
Concern about impact of shared use roads and continuous footways on pedestrian safety	3
Concern about pedestrianisation of Oxford Street	3
Concern about the reduction in residential car parking / garages	3
Concern regarding homelessness in London	3
Oppose construction of Cycle Superhighway 9 through Chiswick	3
Suggest a reduction in cost of taxi fares	3
Concern about tolls on river crossings	2
Concern regarding bus driver behaviour	2
Concern regarding damage to roads caused by HGVs	2
Concern that existing mini-Holland schemes are poorly designed / waste of money	2
Concern that fines for children being late to school encourages parents to drive children to school	2
Concern that some need to use car for personal security safety reasons (i.e. fear of crime)	2
Oppose HS2 / Euston redevelopment	2
Suggest compelling foreign owners of housing stock to rent them at affordable prices	2
Suggest improving education / knowledge regarding recycling	2
Suggest night-time refuse collection	2
Concern about coaches using residential roads	1
Concern about crowding in public services e.g. hospitals and schools	1
Concern about HGV driver behaviour	1
Concern about London's sewerage system	1
Concern cuts to TfL funding will reduce public transport services and hinder mode shift from private car	1

Code	Count
Concern regarding fare evasion on public transport	1
Oppose lower rates of vehicle tax for lower emission vehicles	1
Oppose nationalising public transport	1
Oppose proposed ban on stoves in London	1
Request for more information on TfL proposals to transform Wandsworth Town Centre's street layout	1
Suggest banning buggies / pushchairs / prams on buses	1
Suggest cutting business rates to assist small businesses	1
Suggest fines for motorcycles not parked in dedicated motorcycle bays	1
Suggest that fireworks should be banned in London	1
Suggest that landlords are charged for owning vacant properties	1

Appendix H: Further analysis of campaign responses

1. Transport for London (TfL) ran a public consultation from November 2017 to February 2018 regarding proposals for the Ultra Low Emissions Zone (ULEZ) in London. Steer Davies Gleave analysed individual and campaign responses to this consultation. Campaign responses were co-ordinated by different organisations and some responses were received via the online portal, some by email. This memo summarises the campaign responses received. Outputs summarising individuals responses have been provided separately.

Method

2. Each campaign had a standard response, which the majority of respondents submitted. However, some respondents had edited the standard response suggested by the campaigns. Many responses were therefore very similar to the standard response, with minor edits or additions; while others were completely different from the standard response.
3. This memo shows the standard response for each campaign before providing a code frame which summarises the points made in edited or additional responses. The same code frame developed to analyse open responses received to the main consultation was used and additional codes were added if needed.

Summary of campaign responses received

4. Table 1 shows the number of different campaign responses received.

Table 1: Campaign responses received

Campaign response	Count
Healthy Air verbatim	2,437
Healthy Air edited	286
Friends of the Earth verbatim	1,194
Friends of the Earth edited	187
Mums for Lungs verbatim – portal	11
Mums for Lungs verbatim – emails	35
Mums for Lungs edited	4
Motorcycle Action Group verbatim	10
Motorcycle Action Group edited	5
Total	4,169

Healthy Air campaign

5. In total, 2,723 Healthy Air campaign responses were received via the online portal. Of these:
 - 2,437 responses (89%) were verbatim to the standard response (shown in Box 1)
 - 286 responses (11%) edited or added to the standard response

Box 1: Healthy Air verbatim response (2,437 responses)

I strongly welcome the Mayor's commitment to tackling London's illegal and harmful levels of air pollution. Road transport is a major source of air pollution and we need urgent action to tackle this. By focusing on road transport and in particular diesel vehicles, he is demonstrating that he understands the urgency of addressing this public health crisis. However, he needs to go further and faster to meet his legal and moral obligations to protect the people of London from harmful air pollution.

A stronger, bigger Ultra Low Emission Zone brought in sooner is vital. I welcome the proposal to strengthen the existing Low Emission Zone for heavy duty vehicles and expand the proposals for the Ultra Low Emission Zone for cars and vans to protect inner London but the Mayor should go further to ensure that all Londoners have the same opportunity to breathe cleaner air in the shortest time possible. Transport for London's own analysis of a London-wide Ultra Low Emission Zone for all vehicles shows that this option will deliver greater emissions reductions.

I am concerned that car manufacturers are still not producing diesel cars that are as clean as they should be. I would like to see standards set for the Ultra Low Emission Zone that will ensure that the vehicles that enter the zone are the cleanest available on the road and not just in the lab.

I also welcome the fact that the Mayor has acknowledged the need to reduce the number of vehicles on our roads. Fewer and not just cleaner vehicles are needed to tackle illegal and harmful levels of air pollution in the shortest time possible. I would like the Ultra Low Emission Zone to be designed to support this and set a path towards a zero emissions future, starting with a zero emissions zone in central London by 2025.

**This response was supported by the Healthy Air Campaign*

6. Table 2 shows how the 2,437 Healthy Air verbatim response were coded in the ULEZ code frame.

Table 2: Healthy Air verbatim response coding

Theme	Code
General	Support proposals
Sources of pollution	Concern regarding health impacts of poor air quality
Principle of the ULEZ / LEZ	Support tougher measures on air quality than proposed
Question 1 LEZ Boundary	Support London-wide LEZ for HGVs
Question 5 ULEZ Boundary	Suggest ULEZ should be London-wide (non-specific boundary) for all vehicles
Timescales	Suggest ULEZ is extended London-wide sooner than planned
Emission standards	Support stricter emission standards for diesel vehicles
Emission standards	Suggest tested emissions data (i.e. MOT) should be used to set standards instead of EURO standards, which do not reflect real world conditions
Suggested supporting policy	Suggest reducing general traffic levels in London
Principle of the ULEZ /	Suggest eventually turning ULEZ into a Zero Emissions Zone / only allowing

LEZ**EVs / hydrogen**

7. The other 286 responses edited or added to the verbatim response in some way.

Friends of the Earth campaign

8. In total, 1,381 Friends of the Earth campaign responses were received via email. Of these:
- 1,194 responses (86%) were verbatim to the standard response (shown in Box 2)
 - 187 responses (14%) edited or added to the standard response

Dear Transport for London,

London's dirty air needs cleaning up – fast. The Mayor's plans are a great start but he needs to do more to tackle the capital's air pollution problem and reduce health risks for millions of people.

The Ultra Low Emission Zone must come into force much sooner than planned – by the end of 2018 at the latest. Londoners shouldn't have to wait until 2021 for cleaner air.

The Zone must cover the whole of London to make a difference, extending beyond the North and South Circular roads and including all of Outer London too.

To make a significant impact the Zone must also cover all vehicle types. Over half of the polluting nitrogen oxides emissions from London's road transport comes from cars and light goods vehicles – including taxis. It's vital that the Mayor acknowledges and addresses this.

Box 2: Friends of the Earth verbatim response (1,194 responses)

9. Table 3 shows how the 1,194 Friends of the Earth verbatim responses were coded in the ULEZ code frame.

Table 3: Friends of the Earth verbatim response coding

Theme	Code
General	Support proposals
Sources of pollution	Concern regarding health impacts of poor air quality
Principle of the ULEZ / LEZ	Support tougher measures on air quality than proposed
Timescales	Suggest ULEZ is implemented before the end of 2018
Question 5 ULEZ Boundary	Suggest ULEZ should be London-wide (non-specific boundary) for all vehicles
Discounts and exemptions	Oppose any exemptions
Sources of pollution	Concern regarding pollution caused by private / individual vehicles
Sources of pollution	Concern regarding pollution caused by vans / commercial / delivery vehicles
Sources of pollution	Concern regarding pollution caused by taxis

10. The other 187 responses edited or added to the verbatim response in some way.

Mums for Lungs campaign

11. In total, 50 Mums for Lungs campaign responses were received, some via the portal, some via email.

- 11 responses (22%) were verbatim responses received via the online portal
- 35 responses (70%) were verbatim responses received via email
- Four responses (8%) edited or added to the standard response received via the online portal

12. The verbatim response via the online portal (Box 3) and via email (Box 4) differed slightly and this is shown below.

Box 3: Mums for Lungs verbatim online portal response (11 responses)

For the health of our kids and all of us, I ask you, Mr Mayor, to be more bold and progressive, follow the lead of the London Assembly and implement the ULEZ and LEZ within your current tenure and to cover all of London to ensure the health of all Londoners is protected. The current proposals leave at least 74,000 Londoners breathing toxic air.

I urge you to work hard and fast to achieve full compliance with air pollution limits for the whole of London by 2020. You have the power to build a foundation of an eco-city, and leave a lasting legacy of cleaner air for all of us to benefit from. We are relying on you

Please follow the lead of the London Assembly and implement the ULEZ and LEZ within your current tenure, ensuring both cover all of London. I urge you to work hard and fast to achieve full compliance with air pollution limits for the whole of London by 2020. You have the power to build the foundations of a healthy city, and leave a lasting legacy of cleaner air for us all. We are relying on you. I will be sharing your response with my network and Mums for Lungs.

Box 4: Mums for Lungs verbatim email response (35 responses)

13. Table 4 shows how the 11 Mums for Lungs online portal verbatim responses were coded in the ULEZ code frame.

Table 4: Mums for Lungs verbatim online portal response coding

Theme	Code
General	Support proposals
Sources of pollution	Concern regarding health impacts of poor air quality on children
Sources of pollution	Concern regarding health impacts of poor air quality
Timescales	Suggest ULEZ in central zone is implemented sooner than planned
Question 1 LEZ Boundary	Support London-wide LEZ for HGVs
Question 5 ULEZ Boundary	Suggest ULEZ should be London-wide (non-specific boundary) for all vehicles
Timescales	Suggest ULEZ is extended London-wide sooner than planned

14. Table 5 shows how the 35 Mums for Lungs email verbatim responses were coded in the ULEZ code frame.

Table 5: Mums for Lungs verbatim email response coding

Theme	Code
General	Support proposals
Timescales	Suggest ULEZ in central zone is implemented sooner than planned
Question 1 LEZ Boundary	Support London-wide LEZ for HGVs
Question 5 ULEZ	Suggest ULEZ should be London-wide (non-specific boundary) for all

Boundary	vehicles
Timescales	Suggest ULEZ is extended London-wide sooner than planned

15. Four Mums for Lungs responses received via the online portal edited or added to the verbatim response.

Motorcycle Action Group campaign

16. In total, 15 Motorcycle Action Group campaign responses were received via the online portal. Of these:
- 10 responses (66%) were verbatim to the standard response (Box 5)
 - Five responses (33%) edited or added to the standard response

1. Why are riders of older, small-capacity bikes being charged, that often achieve up to 120mpg, when other forms of transport, e.g. taxis, which produce considerably higher emissions with a single occupant, aren't? We're not asking for taxis to be charged – only for a level playing field.

2. Why does the Mayor want to force riders of these machines onto a public transport system that will expose them to up to eight times more particulate matter, according to publicly available research, than using private transport such as a motorbike, when the whole purpose of the change is meant to be environmental and health related?

3. Will the Mayor compensate the thousands of low-paid workers using small, older motorbikes because it's all they can afford, and what scheme will he be setting up to pay the difference in cost between cheap, older bikes and expensive public transport?

Box 5: Motorcycle Action Group verbatim response (10 responses)

17. Table 6 shows how the 10 Motorcycle Action Group verbatim responses were coded in the ULEZ code frame.

Table 6: Motorcycle Action Group verbatim response coding

Theme	Code
Impact of proposals	Concern regarding disproportionate impact on motorcycles
Impact of proposals	Concern that charging motorcycles will make users switch onto cars and thus cause more pollution
Question 7 ULEZ Charging levels	Suggest motorcycles should be considered a separate category of vehicle
Suggested supporting policy	Suggest encouraging motorcycles as they are a solution to the air quality problem and are being disproportionately punished
Impact of proposals	Concern regarding disproportionate impact on people who rely on motorcycles for commuting
Impact of proposals	Concern regarding disproportionate impact on people who rely on motorcycles for work
Economic / financial impacts	Concern over high cost of public transport (expensive)
Sources of pollution	Concern regarding air quality on board public transport

18. The other five responses edited or added to the verbatim response in some way.

