

Caroline Russell AM



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Sadiq Khan
Mayor of London
City Hall
London SE1 2AA

Dear Sadiq

Consultation response: New proposals to improve Air Quality – Have your say on the introduction of a new Emissions Surcharge and ideas for improving Ultra Low Emission Zone (ULEZ).

Thank you for the opportunity to comment on your stage 2 statutory consultation to introduce the Emissions Surcharge and a non-statutory consultation on ideas for how the ULEZ could be improved. I have set out my views under each of the consultation questions.

Since this consultation was launched, there has been a ruling of the High Court on the recent case brought by ClientEarth against the Secretary of State for the Environment, Food and Rural Affairs (DEFRA). The judgement sets out a requirement for the Secretary of State to choose a route to reduce exposure, not just meet limit values.

Delivering full compliance with air pollution limits as soon as possible and reducing Londoners' exposure to polluted air needs urgent traffic reduction interventions along with measures to reduce car use and enable a rapid transition to more journeys being made on foot, by bike and by public transport.

Car journeys declined substantially, whilst London's population rose by 20 per cent between 1991 and 2011. With the right interventions, Londoners could help achieve further traffic reduction.

Travel measures implemented during the 2012 London Olympics resulted in less traffic with freight operators re-timing deliveries and reducing their transport activities; and nearly two third of Londoners altering their usual travel behaviours or switching to cycling and walking. Londoners know how to do this and should be enabled to pick this up again.

I am surprised that there is no element of road pricing in the ULEZ consultation. Once paid, the proposed Emissions Charge has no built in incentive to reduce vehicle use. In fact quite the opposite, people may want to get value for having paid it and use their vehicle as much as possible.

Road pricing is a tool to reduce traffic. Charges can vary by time of day, distance travelled and the level of emissions from the vehicle being driven. This is a nuanced system that discourages extra vehicle trips and allows fairness issues to be addressed with exceptions for people with disabilities or essential workers eg midwives and care workers who carry heavy equipment.

The Federation of Small Businesses, London First, the Royal Town Planning Institute, the Institute of Civil Engineers and the Royal Academy of Engineering have expressed support for a smart, effective and comprehensive system of traffic demand management.

Since the current ULEZ and Emissions Charge proposals are the only option on the table, I give them my full support, in order to get started on cleaning up London's air. However, I believe that London needs a road pricing scheme to tackle air pollution and congestion effectively.

Yours sincerely



Caroline Russell

London Assembly Member, Green Party Group

cc. Elliott Treharne

Response from Caroline Russell AM to the Mayor's Consultation on Air Quality, Emissions Surcharge and Ultra Low Emission Zone

Part 1 - Emissions Surcharge

Q1. To what extent do you support or oppose the introduction of a new £10 Emissions Surcharge on the Congestion Charge to discourage the use of older, more polluting vehicles in central London to improve air quality and health?

In the absence of a road pricing scheme, I strongly support a £10 Emissions Surcharge. However, it needs to go further and should be applied to all diesel vehicles, including Euro 6 diesel.

The health impacts of diesel pollution are so serious that ideally all diesel vehicles should be banned from London as soon as practically possible.

Q2. We are proposing that the Emissions Surcharge will start on 23 October 2017 as the earliest possible operational date for implementing the scheme. Do you agree with this implementation date?

Yes, I fully support an emissions surcharge starting as soon as possible.

Q3. Following the start of ULEZ in central London, to what extent do you support or oppose residents continuing to be liable for the Emission Surcharge, at the discounted rate of £1, during the ULEZ sunset period (for the first 3 years, while residents do not pay the ULEZ charge)?

I strongly support residents being liable for the Emission Surcharge. I do not support a discounted rate, because this will not discourage short car journeys. Any sunset period charge must have a car-use deterrent effect and £1.00 will not deter most users.

Q4. To what extent do you support or oppose the exemption of historic tax class vehicles?

I strongly oppose the exemption of historic tax class vehicles. All vehicle users should pay if their vehicle pollutes.

Q5. To what extent do you support or oppose the exemption of Showmans' vehicles?

I strongly oppose the exemption of Showmans' vehicles. All vehicle users should pay if their vehicle pollutes.

Q6. Do you support or oppose including L-Category vehicles (e.g. three wheeled vehicles and quadricycles) that currently pay the congestion charge?

I strongly support the inclusion of L-Category vehicles. All vehicle users should pay if their vehicle pollutes.

Q7. Do you support or oppose including 9+ seater vehicles, such as coaches, buses and minibuses?

I strongly support the inclusion of all 9+ seater vehicles. All vehicle users should pay if their vehicle pollutes.

Part 2 - Bringing ULEZ forward to 2019

Q8. Do you support or oppose the idea of bringing forward the introduction of the central London ULEZ to 2019 to improve air quality and health?

I strongly support bringing the ULEZ implementation forward so that the Mayor is taking all action possible to reduce the exposure of Londoners to polluted air.

Part 3 - Expanding ULEZ to inner London

Q9. Do you support the overall principle of expanding the ULEZ (up to but not including) the North and South Circular roads for all vehicles?

I strongly support the overall principal of expanding the ULEZ to the North and South circular roads for all vehicles.

At the [London Assembly Plenary meeting on 8th June 2016](#), you said "The consultation will include plans about the Ultra Low Emission Zone (ULEZ), about whether we can bring it forward and about whether we can expand the area to include the North and South Circular"

Londoners should have an opportunity to comment on options that include the North and South circular roads in the ULEZ.

Many outer Londoners would like a ULEZ for the whole of London to apply to all vehicles, not just heavy vehicles as currently proposed.

Londoners should have an opportunity to comment on both these options.

Q10. When do you think the expansion of ULEZ (up to but not including) the North and South Circular roads for all vehicles should be introduced? Please choose the year you think would be most appropriate.

I strongly support bringing the ULEZ implementation forward as soon as practically possible and certainly by early 2019. Pollution exposure is not limited to the boundaries proposed. Outer Londoners should also be confident they are breathing clean air.

Q11. An expanded ULEZ will affect many more cars, vans and motorcycles. Do you think the daily charge for the ULEZ in inner London (between the Congestion Charge zone and the North and South Circular roads) should be the same or different to the current charge for the ULEZ in central London?

The daily charge should be the same for light vehicles in each zone. Presumably vehicles crossing between the zones will pay in each zone separately to discourage car-use?

I would prefer a road pricing scheme which takes account of the emissions of the vehicle, the time of day and distance travelled. This is a fairer system and allows for essential journeys affordably but discourages extra trips by car.

Part 4 - Expanding ULEZ Londonwide

Q12. To what extent do you support or oppose the overall principle of expanding ULEZ London-wide for heavy vehicles?

I strongly support the proposal, but it should go further and apply to all vehicles.

Q13. When do you think the expansion of ULEZ London-wide for heavy vehicles should be introduced? Please choose the year that you think would be the most appropriate.

The Londonwide ULEZ should be introduced in early 2019, or sooner if possible.

Part 5 - Further comments

Q14. If you have any further comments about any of the proposals to improve air quality in London, please write these in the box below.

Other sources of pollution

There are places in London suffering persistent air pollution from commercial river vessels. Whilst the GLA Act does not give the Mayor powers to include commercial vessels as part of the ULEZ, the Mayor should lobby the Government on this in any reviews of the Clean Air Act or similar legislation.

Projects creating major new sources of air pollution, such as the proposed Silvertown Tunnel, which will generate more journeys by car or the Viridor Energy from Waste incinerator in Sutton should be mothballed.