

ULEZ consultation, phase 3a – London Assembly Response

The Mayor, through Transport for London (TfL) is conducting a formal consultation on bringing forward the Ultra-low Emission Zone (ULEZ). The current proposals also contain further changes to plans for extending the ULEZ beyond the central zone, but these are for formal consultation in another phase in the autumn.

The Environment Committee is submitting this response on behalf of the London Assembly. The response is agreed by a majority of the Committee. Dissenting views, from the Conservative and UKIP Members, are noted in the appendix. The Green Member, while supporting the content of this response, has an additional point contained in the Green Group's response to this consultation and referred to in a note to the section below on other developments of the Mayor's ULEZ proposals.

Zonal charges already in place or already ordered

London has had a Congestion Charge since 2003, covering a specified area of central London (referred to here as the central zone) and imposing a daily charge of £11.50 on most vehicles at specified times (broadly, during working hours).

From 2008 (with standards tightening until 2012) London has had a Low Emission Zone, covering approximately the whole Greater London area, and charging more polluting larger vehicles. The daily charge is £100 for larger vans and minibuses not meeting the Euro 3 standard, and £200 for heavy lorries and coaches not meeting the Euro IV standard.

From 23 October 2017, as ordered by the current Mayor, an Emissions Surcharge of an additional £10 on top of the Congestion Charge will come into effect for most older (pre-Euro 4) vehicles, in the same zone and hours as the Congestion Charge.

In September 2020, as ordered by the last Mayor, a ULEZ is due to come into effect. Under the existing order, this is to apply to the central zone, at all times. It will impose a daily charge of £12.50 (for light vehicles) or £100 (for heavy vehicles) on most more polluting (pre-Euro 4 for petrol, pre-Euro 6 for diesel) vehicles. This will replace the Emissions Surcharge, as vehicles and users become liable for it. The different Euro standards for petrol and diesel vehicles are on paper approximately equivalent in terms of emissions, though on-the-road compliance with the standard is an issue for many current diesel cars.

These zonal charges are part of a raft of air pollution policies implemented, proposed or called for by successive Mayors. Some, such as standards set by TfL for buses operating in central London or on routes in specified Low Emission Bus Zones, or emissions standards for taxis and minicabs, are also intended to reduce the presence of the most polluting vehicles on London's roads or in certain areas of London.

Strengthening measures on air pollution

The Environment Committee at the time found that the ULEZ ordered by the last Mayor did not go far enough. It recommended that the scheme cover a wider area, be introduced sooner than 2020, and the charge to increase over time to have a stronger effect. The

committee also underlined the importance of making vehicle-switching affordable for affected drivers, and supported the Mayor's call for a national diesel scrappage scheme.

The current Mayor has been making proposals to take forward some of the Committee's main recommendations, implementing the central charge earlier, and widening the zone to cover an extended inner zone for light vehicles and London-wide for heavy vehicles.

Formal consultation proposals for bringing forward the ULEZ

The formal proposals in the current consultation include:

- Bringing forward the implementation of the ULEZ in central London to April 2019
- Revising the ULEZ emissions standards to include particulate matter (PM) emissions from diesel vehicles, in addition to the nitrogen oxides (NO_x) emissions regulated by the current order

Response

As in previous consultation responses, we urge wide and early implementation of the ULEZ.

We welcome the firming-up of a 2019 date for the central zone rather than 2020. Ideally, we would support introduction as early as January 2019.

We also support the revision of the ULEZ standards to cover PM emissions. As the consultation paper says this signals the Mayor's continued attention to PM and aligns the ULEZ with the Government's proposed framework for Clean Air Zones nationwide. We do note that under both the main type approval process for the Euro 6 standard and the national retrofit certification scheme, vehicles compliant with Euro 6 for NO_x are highly likely to meet the standard for PM in any case.

Other developments of the current Mayor's ULEZ proposals

The Mayor still proposes to expand the ULEZ beyond the central zone. Outside the formal consultation paper, but released at the same time, the Mayor has revised his previous indications of when he intends to extend the ULEZ.¹ These proposals are expected to be for formal consultation in the autumn:

- Applying the ULEZ to heavy vehicles London-wide, from 2020.
- Applying the ULEZ to light vehicles in a zone within the North and South Circular roads, from 2021.

Response

We fully support extension of the ULEZ London-wide for heavy vehicles, but consider that this should be implemented from 2019 rather than from 2020. At the latest it should be in place by the end of the current Mayoral term in May 2020.

For light vehicles, we continue to support expansion to a zone within the North and South Circulars as a minimum and again at an early date, preferably 2019. We would support

¹ <https://www.london.gov.uk/press-releases/mayoral/mayor-plans-to-introduce-ulez-in-april-2019>

further consideration of wider boundary options, and the most preferable option would be for a London-wide ULEZ for all vehicles.

Alternatives for consultation could include placing the North and South Circular roads themselves in the zone, incentivising drivers to find a wider range of alternative options, rather than simply diverting onto these already-congested roads.

There is demand from boroughs for areas outside the North and South Circulars to be included.² Particular consideration should be given to south London where the South Circular cuts through inner London much more closely than the North Circular does. If an inner zone with a diversionary road boundary is chosen, sections of the A232 are more equivalent to the A406 North Circular than is the A205. This distinction is the minimum that is required to bring symmetry between north and south London, although our preference is to have the ULEZ and LEZ at the same boundary.

Extending the ULEZ to all of London for light vehicles as well as heavy would simplify the zonal structure, largely remove the discrepancies between north and south London, and offer the purpose-built orbital M25 motorway as a diversionary route. This option could be considered as a 2020 phase, to allow car and van drivers in outer London time to acquire compliant vehicles or take other alternative options.

The reasons for expanding the ULEZ beyond the North and South Circulars were stated more fully in our December 2016 response to the Phase 2 consultation.³

We consider that the apparent shift to a preferred date for this expansion of 2021 represents a negative development in the Mayor's plans. We would prefer an earlier date, ideally in 2019, or at the latest by the end of the current Mayoral term in May 2020.

Looking beyond 2020, and considering the recent announcements of future diesel bans from Paris, Mexico City, Madrid and Athens, the potential to remove Euro 6 diesels from exemption should be considered, if forthcoming real-world driving emission standards do not reduce emissions effectively. Earlier dis-exemption of diesels could be considered in the central zone. Consideration should also be given to progressive tightening of exemption standards towards zero tailpipe emissions; a statement of intent for a zero emissions standard in 2025 would give an appropriate signal to drivers, operators and the vehicle industry.⁴

² See for example the responses to the previous phase of consultation in which 14 boroughs, plus pan-London local government bodies, supported further expansion <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-two/> page 61

³ <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/responses-mayoral-consultations-ulez-and-air>

⁴ The Green Group on the London Assembly, while supporting the ULEZ as an improvement on the existing situation and also endorsing the improvements to the ULEZ that are recommended in this response, has proposed in its own response to the current consultation that it would be better still to have a more sophisticated form of road user charging related to distance driven as well as vehicle type.

Other measures

We continue to support the Mayor's calls for the national government to take tougher action on air pollution, including a nationally-funded diesel scrappage scheme. This would both reduce the costs of the ES and ULEZ to drivers, and enhance their air quality impact, by facilitating switching to cleaner vehicles.

We also support the devolution of Vehicle Excise Duty (VED or 'road tax') to London, enabling the Mayor to set rates that take into account air pollutants as well as CO₂ emissions, and to retain revenue raised in London for London use rather than seeing it reserved to the national strategic road network, almost all in other parts of the country.

Our calls on the Government are set out more fully in our recent response to the consultation on the national Air Quality Plan.⁵

As the Committee has also previously stated, running through the Mayor's transport emissions work should be a priority on traffic reduction, with complementary measures to enable modal shift to buses, trains, walking and cycling. The experience of reducing car journeys between 1991 and 2011, and during the 2012 London Olympics, show how Londoners can adapt their travel behaviours. Less traffic on the roads can reduce congestion, improve journey times and reliability including for buses, and further encourage sustainable travel choices.

We have likewise drawn attention to other air pollution issues, including emissions from private hire vehicles, river transport and non-transport sources.

⁵ <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/london-assembly-response-national-air-qualit-0>

Appendix: Dissenting views

View from the GLA Conservatives

The GLA Conservatives, whilst we welcome the Mayor's attention to air quality in London, are unable to support this response. We are particularly concerned about the impact of the Mayor's proposals to widen the ULEZ beyond the Congestion Charge Zone and bring forward its start date to 2019. We would certainly not support the recommendation to further extend the ULEZ London-wide for cars and vans.

We do not feel that there would be sufficient benefit, in going beyond the original ULEZ proposals, to justify the additional restrictions and costs to vehicle owners – especially residents and small businesses – or the impact on London's economy that these measures are likely to bring. This would place a particularly unfair burden on small businesses, especially those that do not operate in central London, forcing them to cover the costs of pollution generated by larger businesses. The loss of struggling small businesses would devastate local communities.

We continue to strongly support the original ULEZ scheme in central London, as a targeted and effective way of tackling London's worst polluted areas. However, a larger ULEZ would ultimately mean many areas without poor air quality would be paying for those that do, for the sake of very marginal improvements compared with the original plans. In our view a much fairer and more effective way of tackling pollution beyond central London would be more targeted measures at pollution hotspots, such as Heathrow and other areas.

With this in mind, we would therefore request that our opposition to this Committee response be noted, as well as our opposition to the Mayor's proposals an expanded ULEZ.

View from the UKIP Group

ULEZ

We support the original plan announced by the previous Mayor to introduce a ULEZ in the congestion charging zone in 2020 with exemptions for Euro 4, 5 and 6 petrol engines and Euro 6 diesel engines. The implementation date should not be brought forward. Motorists and businesses need enough forward notice as possible to adapt to plans, especially as they bought into diesel on the advice of the previous government. There will be a decrease in emissions from diesel vehicles in the area as vehicle owners begin to convert to cleaner vehicles ahead of 2020.

Any ULEZ should be targeted in the areas which have pollution levels above WHO levels. There are two areas which are most affected are: the central congestion charging zone and Heathrow. We would also support a Heathrow ULEZ where NO₂ levels are particularly high with the same exemptions and a long enough notice period for businesses to adapt without being put in danger of liquidation from extra overheads. A notice period of 5 or 6 years is adequate, so an implementation date of 2022 for a Heathrow ULEZ would be acceptable

We also support investigating the effects a possible total diesel ban in the Central and Heathrow areas with a 10 year notice period.

Road Pricing

UKIP are opposed to all road pricing measures. Such a scheme will require all vehicle movements to be monitored by a government agency and will have a devastating impact on freedom and civil liberties.

Vehicle Excise Duty

UKIP does not support the devolution of Vehicle Excise Duty payment from the Department of Transport to the Mayor of London.

Other Measures

Pollution (and also congestion) are affected by the very high numbers of PHV licences being granted by TfL. There are currently over 110,000 PHV driver licences, with an extra 25,000 every year. By the time of the next election in May 2020 there will be more than 200,000 PHV driver licences at the current rate. Pollution controlling measures will be useless unless the number of PHV drivers is reduced, and PHV vehicle licences are restricted to petrol, hybrid or electric vehicles.

Cycle superhighways are responsible for traffic congestion in central London. Although they are well intentioned, London's roads are far narrower than other cities like Berlin and Perth, where wider roads mean that dedicated cycle lanes can be installed without causing extra congestion. Congestion leads to slower journey times, and many more cars idling in central London, leading to an increase in air pollution. To reduce pollution, cycle superhighways along trunk roads should be re-purposed for motorised vehicles outside rush hours, and no new cycle superhighways should be installed.

Emissions from secondary diesel engines, such as in refrigerated lorries, are not regulated at all. Legislation needs to be introduced to regulate NO₂ and PM_{2.5} emissions from secondary engines, which can currently be much greater than primary engines. The Mayor should begin lobbying for controls on these emissions.

Population growth and mass, rapid immigration into the capital is also a factor which affects pollution levels both directly and indirectly. An extra 135,000 people per year living in London means more vehicles and therefore more congestion and more emissions. Controlling our borders, reducing immigration and achieving a sustainable population must be considered in any discussion on reducing congestion or pollution.