



Mark Davidson
Deputy Assistant Commissioner
London Fire Brigade
169 Union Street
London
SE1 0LL

Transport for London
Transport Strategy and Policy

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 0343 222 1234
www.tfl.gov.uk

15 June 2023

Dear Mark

Memorandum of Understanding – ULEZ & LEZ fleet compliance

I am writing to set out a Memorandum of Understanding (MoU) between TfL and the London Fire Commissioner (“LFC”) on behalf of the London Fire Brigade (“LFB”) of 169 Union Street, London, SE1 0LL.

This MoU concerns the transition to a vehicle fleet that complies with or exceeds London’s Ultra Low Emission Zone (ULEZ) and Low Emission Zone (LEZ) vehicle emission standards and how TfL will arrange for non-compliant vehicles to be treated under both schemes. In advance of the expansion of the ULEZ London-wide from 29th August 2023, and the continued operation of the LEZ it sets out an understanding of how your organisation’s fleet of vehicles:

- Will achieve compliance with London-wide ULEZ vehicle emissions standards (where applicable) for light vehicles within its fleet, and the timescales for doing so;
- Will achieve compliance with the LEZ vehicle emissions standards (where applicable) for heavy vehicles within its fleet, and the timescales for doing so; and,
- Will transition to a zero emission fleet to reduce your contribution to air pollution and carbon emissions from road vehicle operations, to help fulfil the Mayor’s target of net zero carbon by 2030, as well as the air quality guidelines recommended by the World Health Organization to protect public health.

An MoU is already in place for previous iterations of the ULEZ/LEZ, which is due to expire on 25th October 2023. This letter (MoU) will therefore replace any existing agreements, with effect from 29th August 2023.

In line with national guidance on Clean Air Zones, the Mayor supports some flexibility and recognises that, unlike for most fleets, it is difficult to replace emergency vehicles in order to achieve compliance with the relevant emission standards, as they are specialist and adapted vehicles. This MoU reflects this position, highlighting the non-compliant vehicles within your fleet that meet these criteria.

Progress to date

I am pleased that, despite the specialised nature of LFB's fleet, a large proportion already meets the ULEZ standards, with many more vehicles having transitioned to zero emission or zero emission capable. LFB's fleet is currently 91% compliant with ULEZ/LEZ standards and, by 29th August 2023, it is expected to be 95% compliant. In addition, there are 27 non-compliant vehicles which are owned by the Home Office, but operated by LFB, which have been included in this MoU.

In addition to the requirement to be fully ULEZ/LEZ compliant, emergency services and other public organisations that maintain vehicle fleets must lead by example in tackling environmental challenges and procuring responsibly – delivering, driving and enabling best practice. They can be powerful demonstrators of best practice or new technologies and use their scale to help to drive down costs to enable others to follow suit. In particular, they have a leading role to play in the demonstration and roll out of zero emission vehicles to help fulfil the Mayor's ambition for London to be a net zero carbon city by 2030, as well as the air quality guidelines recommended by the World Health Organization to protect public health.

We are pleased that your organisation has already shown leadership in this area, from the trial of the UK's first electric-hybrid fire engine, to a fully net zero fire station and the installation of charge points across your sites. Wherever possible, we encourage you to shift to zero emission vehicles and to continue the positive progress you have made in this area.

Zero-emission vehicles

In line with the existing commitments set out in the 2018 Mayor's Transport Strategy, the LFB will work where possible towards delivering a fully zero emission capable fleet by 2030, to support the Mayor's ambition for a net zero carbon city by 2030. This includes continued investment in new technology for specialist, zero emission vehicles, as well as infrastructure investment on the LFB estate.

Home Office vehicles

27 vehicles operated by LFB are owned by the Home Office, and therefore outside the control of LFB. TfL and GLA will join the LFB to continue calling on the Home Office to accelerate the transformation of their fleets to cleaner

vehicles, as LFB and other fire brigades across England have been doing over the past few years.

Progress reporting

In order to monitor your progress switching to cleaner and where possible, zero emission vehicles, TfL and the GLA will require you to provide a quarterly update on progress. This reporting process will be agreed between TfL, the GLA and the LFB, and will include (as a minimum) regular updates on:

- Your progress toward achieving full ULEZ/LEZ compliance by the temporary exemption expiry dates set out below;
- The percentage and number of vehicles in the fleet that are ULEZ or LEZ compliant;
- Any challenges or delays you face doing so; and,
- Progress in switching to zero emission alternatives.

Temporary exemption from ULEZ/LEZ Standards and Charges for some vehicles

TfL has agreed that the vehicles described in the table below are eligible for a time-limited exemption (often called a “*sunset*” clause) from the applicable ULEZ and LEZ emission standards and non-compliance charges, including the issue or payment of any subsequent Penalty Charge Notices (PCNs) against such vehicles.

Once the exemption expiry date(s) in the table have been reached for each vehicle category, it is expected that your organisation will have achieved full ULEZ/LEZ compliance. From that expiry date those vehicles will be subject to applicable ULEZ/LEZ standards and non-compliance charges (including the payment of PCNs). TfL will confirm in writing prior to charges being applied. This approach is supported by the Mayor.

You will be responsible for uploading details of the vehicles which are subject to a temporary exemption, as outlined above, through your TfL account. All vehicles uploaded must be kept up to date, and any vehicles decommissioned or replaced, must then be removed from the system. Subject to providing TfL with the relevant and up to date vehicle details, vehicles eligible for a temporary exemption will not have to pay the LEZ or ULEZ charge until the exemption expires, and TfL can void and cancel any Penalty Charge Notice (PCN) issued by TfL for the LEZ or ULEZ. You are also responsible for ensuring that access to your TfL account is limited to authorised users. This will jointly be monitored by the GLA air quality team and the TfL transport strategy and policy team.

In total, 56 vehicles qualify for a temporary exemption including 27 owned by the Home Office. This number is capped and TfL and GLA do not expect it to increase without prior consultation at the quarterly meetings mentioned above. A breakdown of these vehicles can be found below.

Table: LFB vehicles temporarily exempt from ULEZ/LEZ standards and charges

<i>Vehicle type</i>	<i>Quantity</i>	<i>Exemption expiry date</i>	<i>Reason</i>
Detection, Identification and Monitoring (DIM) unit	1	31st March 2024	Highly specialist vehicle used to detect chemicals in emergencies. An order has been placed and will be delivered by 31st March 2024.
Command Support Unit	9	31 st March 2024	Highly specialist vehicles used at major incidents where four pumping appliances or more are required. An order has been placed and will be delivered by 31 st March 2024.
Pumping appliances	8	26 th October 2025	Vehicles used for emergency services training.
Operational Support Unit	7	26th October 2025	Highly specialist vehicles used for emergencies and large-scale incidents.
London Resilience Lorry	3	26th October 2025	As above.
6x4 All Wheel Drive	1	26 th October 2025	As above (resource dedicated to wildfires).
National Resilience Lorries	25	26th October 2025	All vehicles owned by the Home Office and out of LFB's control. Highly specialist vehicles used for emergencies and large-scale incidences.
National DIMs	2	26 th October 2025	As above.

Whilst the MoU is not a legally binding document, in signing we expect you to work to the dates and provisions. Please confirm your agreement by signing, dating and returning a copy, as attached.

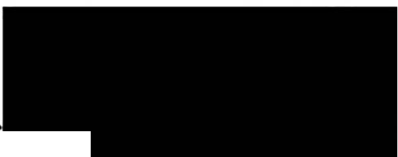
Yours sincerely



Christina Calderato
Director of Transport Strategy and Policy
Transport for London

AGREEMENT

On behalf of the London Fire Brigade, I agree to the contents of this Memorandum of Understanding as set out in the above letter.

Signed 

Position: DEPUTY DEPUTY ASSISTANT COMMISSIONER

Organisation: L.F.B.

Dated: 15/06/23

For and on behalf of L.F.C.