

# Proposals to improve air quality

## Report to the Mayor on consultation

February 2017

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## List of Appendices

(Attached separately)

- Appendix A: List of stakeholders that responded to the ULEZ consultation
- Appendix B: List of stakeholders invited to respond
- Appendix C: Summary of stakeholder responses
- Appendix D: Consultation questionnaire
- Appendix E: Stakeholder meetings
- Appendix F: Glossary of terms
- Appendix G: Public and business free text analysis

Appendix H: Further analysis of campaign responses  
Appendix I: Stage 2 Consultation and information document

# 1. Introduction

## 1.1 Purpose of this report

- 1.1.1 To tackle London's poor air quality the Mayor and Transport for London (TfL) have developed proposals for an Emissions Surcharge (ES) in central London as well as other potential ideas for making future changes to the Ultra Low Emission Zone (ULEZ). The purpose of this report is to inform the Mayor of the results of a public and stakeholder consultation on both topics, which took place between Monday 10 October 2016 and Sunday 18 December 2016. This was the second stage of a series of consultations on ideas and proposals to improve the Capital's air quality.
- 1.1.2 This report describes how that consultation was carried out, analyses stakeholder and public responses, and makes recommendations to the Mayor about the issues raised. It should be read in conjunction with the consultation material published by TfL<sup>1</sup>, which contained details of the ES proposals and other potential ULEZ changes, as well as other information about their likely impacts and other relevant matters. Particular attention should be given to the detailed Consultation and information document that was published as part of the consultation material.
- 1.1.3 The Stage 2 consultation included a statutory consultation on the ES proposal. If confirmed, the ES will require vehicles driving in the Congestion Charging zone to meet emissions standards or pay a £10 supplement to the Congestion Charge. It would come into force on 23 October 2017 and would apply during the same hours as the Congestion Charge. The consultation proposals are described in further detail in Chapter 2 of this report.
- 1.1.4 Additionally, the Mayor and TfL have suggested potential ideas for changes to the ULEZ and these were also included in the consultation. The ULEZ itself was agreed in March 2015 by the previous mayor. It requires all vehicles driving in central London to meet exhaust emissions standards (ULEZ standards). The ULEZ is set to take effect from 7 September 2020, and apply 24 hours a day, seven days a week. A vehicle that does not meet the ULEZ standards could still be driven in central London, but a daily 'non-compliance' charge would have to be paid to do so.

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<sup>1</sup> <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/?cid=airquality-consultation>

- 1.1.5 The Stage 2 consultation included preliminary ideas or suggestions for:
- Bringing forward the date of implementation of the ULEZ to 2019 from 2020
  - Expanding the ULEZ Londonwide for lorries, buses and coaches, from 2019 or later
  - Expanding the ULEZ up to the North and South Circular Roads for all vehicles currently subject to the central London scheme from 2019 or later
- 1.1.6 These proposals are described in further detail in Chapter 3 of this report. As the Consultation and information document stated, depending on feedback from this consultation and on-going feasibility work, the Mayor would decide whether they should be pursued. If so, TfL would be asked to develop detailed proposals which the public and stakeholders would be formally consulted on in 2017. The public and stakeholders will therefore have a further full opportunity to put forward their views on detailed statutory proposals before any final decisions are made.
- 1.1.7 This consultation was the second stage of a series of consultations to inform the development of the Mayor’s air quality improvement proposals. These stages are summarised in **Error! Reference source not found..**

<p><b>Stage 1 (5–29 July 2016):</b> A consultation hosted on the Talk London website on initial ideas to tackle air quality. The results are available here: <a href="http://data.london.gov.uk/dataset/clean-air-consultation-july-2016">http://data.london.gov.uk/dataset/clean-air-consultation-july-2016</a></p>	COMPLETE
<p><b>Stage 2 (10 October–18 December 2016):</b> A process incorporating a statutory consultation to introduce the ES, and a non-statutory consultation on ideas or suggestions for how the ULEZ could be improved in the future. The Mayor will consider all submissions to the consultation and this report and make a decision on whether or not to confirm the introduction of the ES, with or without modifications. He will also decide whether to ask TfL to proceed with developing the ULEZ ideas into detailed proposals for later statutory consultation after taking into consideration feedback from this consultation.</p>	SUBJECT OF THIS REPORT
<p><b>Stage 3:</b> One or more phases of consultations on detailed statutory proposals concerning suggested future alterations to the ULEZ.</p>	EXPECTED IN 2017

Figure 1: Summary of air quality improvement consultation stages

## 1.2 Structure of this report

1.2.1 Our analysis of the consultation responses and potential policy recommendations are presented for the Mayor's information. The structure of this report is as follows:

- **Chapter 1 – Introduction:** The remainder of this chapter provides the background to the consultation, including the legislative framework and a summary of the proposals and recommendations
- **Chapter 2 – Description of the Emissions Surcharge proposals:** A summary of the ES proposals and their impacts
- **Chapter 3 – Description of the consultation suggestions for the future of the Ultra Low Emission Zone (ULEZ):** A description of the currently confirmed ULEZ and the emerging ideas for how it could be altered, including introducing it sooner and making it larger. A high level indicative analysis of the impacts is also provided
- **Chapter 4 – The Stage 2 consultation process:** Sets out the consultation process undertaken by TfL
- **Chapter 5 – Public, community and business responses to the consultation:** Provides a summary analysis of the consultation responses received in terms of the method of response, respondent type and their travel behaviour
- **Chapter 6 – Analysis of public responses:** Provides an analysis of the responses to the consultation from the public, community groups and business in terms of the number responding to the consultation, support and opposition to the proposals and the key issues raised in the consultation responses
- **Chapter 7 – Campaign responses:** A summary and analysis of the two campaigns run by environmental groups, which generated a large number of responses to the consultation
- **Chapter 8 – Stakeholder responses:** Does the same as Chapter 6, but for stakeholder responses
- **Chapter 9 – Emissions Surcharge issues raised:** Sets out our response to the key issues raised specifically in relation to the ES proposals by theme, and our recommendations and conclusions
- **Chapter 10 – ULEZ issues raised:** Sets out our response to the issues raised specifically in relation to the ideas for altering the ULEZ
- **Chapter 11 – Other issues raised:** A summary, analysis and response to any other issues raised by respondents to the consultation
- **Chapter 12 – Conclusions and recommendations:** Sets out our overall conclusions and recommendations to the Mayor

- 1.2.2 The Mayor is advised, when considering this report, to take into account the individual consultation responses themselves, full copies of which have been provided for his consideration.
- 1.2.3 Should the Mayor decide to proceed with the ES, an information campaign will be launched to inform customers of the implementation of the charge in advance of the start date, which is 23 October 2017.

### 1.3 Air quality and health in London

1.3.1 The objective of the Mayor's proposals is to improve air quality in London. The health impacts of the two pollutants of concern in the Capital are listed below:

- **Nitrogen dioxide (NO<sub>2</sub>):** At high concentrations, NO<sub>2</sub> causes inflammation of the airways. Long-term exposure is associated with an increase in symptoms of bronchitis in asthmatic children and reduced lung function and lung growth
- **Particulate matter (PM):** Long-term exposure to particulate matter contributes to the risk of developing cardiovascular and respiratory diseases, as well as lung cancer. Research shows that particles with a diameter of 10 microns and smaller (PM<sub>10</sub>) are likely to be inhaled deep into the respiratory tract. The health impacts of particles with a diameter of 2.5 microns and smaller (PM<sub>2.5</sub>) are especially significant as smaller particles can penetrate even deeper

1.3.2 London's air quality has improved significantly in recent years and is now considered compliant for all air pollutants for which the European Union (EU) has set legal limits (called 'limit values'), except for NO<sub>2</sub>. The exhaust emissions that give rise to NO<sub>2</sub> are oxides of nitrogen (NO<sub>x</sub>), which are made up of both nitrogen oxide (NO) and NO<sub>2</sub>. The NO forms additional NO<sub>2</sub> by reacting with ozone (O<sub>3</sub>) in the atmosphere. The policy framework and London's responsibility with regard to the main air pollutants is described in the Consultation and information document.

1.3.3 Emissions from road transport are a major contributor to poor air quality in the Capital. In 2013, they accounted for 50 per cent of all NO<sub>x</sub> sources in London<sup>2</sup>. An equivalent of up to 9,400 deaths per year in London is attributed to air quality related illness.

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<sup>2</sup> London Atmospheric Emissions Inventory (LAEI) 2013

1.3.4 Further information regarding air pollution in the Capital and the legal framework in place to improve it is contained in the Consultation and information document that formed part of the Stage 2 consultation material<sup>3</sup>.

## **1.4 Emissions Surcharge Variation Order**

1.4.1 TfL has legal powers under the Greater London Authority Act 1999 (the 'GLA Act', as amended) to make and amend road user vehicle charging schemes. The Congestion Charging (CC) scheme, which seeks to reduce congestion in central London, was introduced and is operated under these powers. It is proposed that the CC scheme is modified to establish the ES standards and the charges that will apply in central London. TfL made a variation order ('VO')<sup>4</sup> to make the necessary amendments to the CC scheme and this was published at the start of the Stage 2 consultation<sup>5</sup>. References to the ES VO in this report are to the published variation order.

1.4.2 The GLA Act requires that for the VO to take effect and to make the necessary changes to the CC scheme to implement the ES emissions standards and charges, the Mayor must decide whether to confirm the VO (with or without modifications). He will do this following consideration of the responses submitted in this consultation, together with all other relevant considerations and matters, including our recommendations as set out in this report.

1.4.3 The ES VO proposed amendments to the CC Scheme Order necessary to implement the ES, namely:

- 1) The introduction on 23 October 2017 of an Emissions Surcharge: a daily charge of £10 (ten pounds) that is payable by a vehicle that does not meet the relevant emission standards for the Surcharge and which would operate during current Congestion Charging hours (7:00 am to 6:00 pm) within the Congestion Charging Zone ("Zone").
- 2) Changes to specify the following:
  - The classes of vehicle that would be subject to the ES and those which are to be non-chargeable for the purposes of the Surcharge or otherwise exempt

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<sup>3</sup> <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/?cid=airquality-consultation>

<sup>4</sup> The Greater London Low Emission Zone Charging (Variation and Transitional Provisions) Order 2014

<sup>5</sup> <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/?cid=airquality-consultation>

- The relevant Euro emissions standards for NO<sub>x</sub> and PM<sub>10</sub> that a vehicle is to be required to comply with in order to enter and drive within the Zone without paying the ES
  - The amount of the ES (£10) and of any applicable discounts (including a 90 per cent discount for vehicles kept by residents of the Zone)
  - Provision for the payment of a penalty charge by the registered keeper of a non-compliant vehicle if the ES is applicable and not paid (whether in combination with any penalty charge that may be issued under the Scheme Order for non-payment of the CC or otherwise)
- 3) Payment methods and the registration requirements for any applicable discounts or exemptions
  - 4) Changes to definitions and interpretation provisions to reflect the above proposals
  - 5) Transitory, transitional or consequential provision and savings in connection with or related to the ES, the CC and the introduction of the ULEZ

1.4.4 The VO did not propose any other changes to the operation of the CC scheme, other than minor consequential amendments required to bring the above ES changes into force.

## **1.5 Summary of recommendations for the Emissions Surcharge proposal**

1.5.1 TfL recommends to the Mayor that he confirms the ES VO, as published, without any modifications. If the Mayor concurs, this would mean that the ES will be implemented as originally proposed in the Consultation and information document, as summarised in Chapter 2 of this report. The ES would come into force on Monday 23 October 2017, and end when the ULEZ in central London starts<sup>6</sup>. The exception to this is residents, who would continue to pay a discounted ES until their three year 100 per cent 'sunset period' discount for the ULEZ ends.

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<sup>6</sup> Currently 7 September 2020, but this date might be brought forward as per the Mayor's ideas for improving the ULEZ. However, this would be subject to further statutory consultation later this year

## **1.6 Consultation suggestions for the future of the Ultra Low Emission Zone (ULEZ)**

1.6.1 The Mayor wanted to develop any proposals concerning the future of the ULEZ with the active involvement of Londoners and relevant stakeholders by considering:

- Bringing forward the introduction of the ULEZ to 2019 (currently planned for 2020)
- Extending the ULEZ Londonwide for heavy vehicles (HGVs, buses and coaches) as early as 2019, but possibly later
- Extending the ULEZ from central London up to the North and South Circular Roads for all vehicles currently subject to the central London ULEZ as early as 2019, but possibly later

1.6.2 As a result, no formal statutory proposals were included in the Stage 2 consultation. However, the Consultation and information document provided relevant information about them, including their likely impacts, and a number of questions about them were contained in the consultation questionnaire.

## **1.7 Recommendation concerning consultation suggestions for the future of the ULEZ**

1.7.1 We recommend to the Mayor that, in consideration of the responses to the three suggestions above concerning the future of the ULEZ, the importance of taking effective action to urgently address London's poor air quality, and the current breach of NO<sub>2</sub> limit values, TfL undertake further development work on these matters and develop statutory proposals to be consulted on later in the year.

## **2. Description of the Emissions Surcharge proposals**

### **2.1 Introduction**

2.1.1 This section provides an overview of the ES proposal, how it was developed and how it is intended to operate. More detail is provided in the Consultation and information document attached as Appendix I.

### **2.2 Development and history**

2.2.1 On 13 May 2016, the Mayor announced his intention to introduce an extra charge on the most polluting vehicles entering central London from 2017<sup>7</sup> using the Congestion Charge payment and enforcement system. He also set out ideas to improve the ULEZ and additional requirements for TfL buses. The Mayor announced that he would begin a consultation within weeks.

2.2.2 Following this announcement, we began work to develop and assess different options for the ES, taking into consideration their impacts on the reduction of NO<sub>x</sub> and the compliance costs associated with each option.

2.2.3 The refined proposals were announced by the Mayor on 5 July 2016 as part of his Clean Air Action Plan<sup>8</sup>. A three-week consultation on this plan was undertaken by the Greater London Authority (GLA), which ran from the 5 July to 29 July 2016. This consultation asked for views on air quality generally and included high level policy ideas for the ES, changes to the ULEZ, additional policy ideas to help improve air quality (such as a national diesel scrappage scheme) and any other ideas respondents might have. The results of the consultation are available on the GLA website<sup>9</sup>.

2.2.4 Detailed information about the development and appraisal of the options for the ES is given in the Consultation and information document published for the consultation and attached as Appendix I. The proposals and impacts are summarised in the remainder of this chapter.

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<sup>7</sup> <https://www.london.gov.uk/press-releases/mayoral/bold-plans-to-clean-up-londons-toxic-air>

<sup>8</sup> <https://www.london.gov.uk/press-releases/mayoral/mayor-unveils-action-plan-to-battle-toxic-air>

<sup>9</sup> <http://data.london.gov.uk/dataset/clean-air-consultation-july-2016>

## 2.3 Summary of Emissions Surcharge proposals

2.3.1 The ES will be an additional daily £10 supplement to the Congestion Charge, payable by owners of a specific category of vehicles who drive in the Congestion Charging zone during charging hours<sup>10</sup>. It will cover older diesel and petrol vehicles that do not meet the Euro 4/IV<sup>11</sup> emissions standard for NO<sub>x</sub> and PM emissions<sup>12</sup>. Pre-Euro 4 vehicles are generally those registered in 2005 and older.

2.3.2 It will mean that:

- All vehicles subject to the daily £11.50 Congestion Charge<sup>13</sup> (eg those not entitled to an exemption or discount) that do not meet the Euro 4/IV standard (Euro 3 for L-Category vehicles) would qualify for an additional daily £10 ES, meaning a total payment of £21.50
- All vehicles that qualify for a 'nine or more seats' 100 per cent Congestion Charge discount (eg minibuses, coaches) but do not meet the Euro 4/IV standard would be subject to a daily £10 ES (total payment)
- If the vehicle is subject to the existing Londonwide Low Emission Zone (LEZ) charge, the ES would be paid in addition to this
- Non-payment of the Congestion Charge or ES will result in a penalty charge of £130 (reduced to £65 if paid within 14 days). This is in addition to any penalty charges for not paying the LEZ charge, if applicable

### ***Discounts and exemptions***

2.3.3 Any registered resident who pays their Congestion Charge using Auto Pay would only pay £2.05 a day in total (90 per cent discounted ES of £1 plus 90 per cent discounted Congestion Charge of £1.05) to drive in the Congestion Charging zone during charging hours, with a vehicle that does not meet the ES standard. It is proposed that residents would continue to

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<sup>10</sup> Monday–Friday, 07:00–18:00, excluding Bank and public holidays and the period between Christmas and New Year

<sup>11</sup> Euro 4 refers to a standard for light vehicles (eg cars) and Euro IV refers to a standard for heavy vehicles (eg lorries, buses and coaches). See Appendix A of the Stage 2 Consultation and information document for more information on Euro standards

<sup>12</sup> The PM limit would only apply to diesel vehicles as there is no PM emission standard set for Euro 4 petrol vehicles

<sup>13</sup> The Congestion Charge is £10.50 for people who register for Auto Pay

pay a discounted ES until their three-year 100 per cent 'sunset period' discount for the ULEZ ends.

- 2.3.4 Vehicles that remain parked will not be charged the ES for that day. Residents with non-compliant vehicles registered for the Congestion Charge discount will automatically be registered for the ES discount.
- 2.3.5 It is proposed that the same discounts and exemptions that apply to the Congestion Charge will also apply to the ES, except for:
- Non-TfL buses, coaches and other 9+ seater vehicles (these will be subject to the ES)
  - Vehicles with a historic tax class (40 years and older) and/or commercial vehicles manufactured before 1973 that qualify for the Congestion Charge (these will be exempt from the ES)
  - Specially constructed or modified Showman's vehicles that are currently subject to the Congestion Charge (these will receive a 100 per cent discount from the ES)
- 2.3.6 A nine plus seater vehicle is defined as a vehicle constructed or adapted for the carriage of passengers and their effects and having a seating capacity of 9 or more persons. This will include all M2 (e.g. minibuses <5T) and M3 (e.g. Coaches and buses over 5T) category vehicles, plus other vehicle categories converted for the carriage of passengers.

***Proposed start and end date***

- 2.3.7 It is proposed that the ES will be implemented on 23 October 2017. The ES will be superseded by the ULEZ emissions standards and charges when it comes into operation, currently scheduled for 7 September 2020. However, this may change as it is subject to the outcome of any statutory consultation on bringing forward the start date to 2019. This is expected later in the year if the Mayor requests TfL to undertake development work on this suggestion.
- 2.3.8 Under the current approved ULEZ scheme, residents living in the zone and registered with TfL will receive a three-year, time-limited 100 per cent discount (from September 2020 to September 2023). This is referred to as the 'sunset period' and means they will not have to pay the ULEZ charge. After September 2023, residents will pay the full charge of £12.50 if they drive a vehicle in the ULEZ that does not meet the relevant ULEZ emissions standards.
- 2.3.9 To align these schemes, we are proposing that the ES will continue exclusively for residents at the discounted rate (90 per cent) until the expiry of their 'sunset period' for the ULEZ. This is to provide continuity during the three years when the ES will end for non-residents' vehicles but the 'sunset period' is still active. If the ES stopped for all vehicles, including residents' vehicles, when the ULEZ starts (currently September 2020), residents with older, more polluting vehicles, would pay nothing for these three years.

## 2.4 Number of vehicles affected

- 2.4.1 Our most recent data (2016) indicates that, when taking account of those that will qualify for the various discounts and exemptions available, approximately 10,000 vehicles are likely to be impacted by the ES. Of these, around 1,000 are likely to be owned by residents of the Congestion Charging zone, so will be eligible for the proposed residents' discount.
- 2.4.2 The affected vehicles are shown in Table 1. We expect the numbers to be lower by October 2017 as a result of natural changes to the vehicle fleet and once consideration of those makes and models that adopted Euro 4 standards early have been taken into account.

**Table 1: Approximate number of vehicles affected by the ES**

Vehicle type	Affected vehicles per day
Cars	7,000
Vans	2,000
HGVs	400
Non-TfL buses and coaches, including minibuses	600
Powered three-wheelers and quadricycles	<50

## 2.5 Impact on emissions

- 2.5.1 As with all impact assessments, there is a degree of uncertainty as to how people may respond, especially when taking into consideration the preparation vehicle owners will be doing ahead of the central London ULEZ launch, currently scheduled for September 2020.
- 2.5.2 The proposed £10 charge could encourage some drivers to stop travelling into the zone. Equally, it is sufficient for some owners of light vehicles, particularly those who frequently drive in central London, to consider buying/using a newer vehicle ('upgrading their vehicle') – one that is also likely to be compliant with the ULEZ standards.
- 2.5.3 As quoted in the Consultation and information document. The mid-range estimate assumes 40 per cent upgrade and seven per cent stop travelling into the zone. This leads to emissions savings from cars of two per cent for NO<sub>x</sub> and one per cent for PM<sub>10</sub>. For total road transport, the emissions saving is 0.5 per cent for NO<sub>x</sub> and 0.3 per cent for PM<sub>10</sub>. This is the saving that would be achieved across the entire first year. During the hours that the ES operates, the emissions savings, as a proportion of total emissions during those hours, would be higher.

## **2.6 Integrated Impact Assessment (IIA)**

- 2.6.1 An IIA was carried out to examine the likely significant impacts of the ES proposal on the environment, health, equalities and the economy. A copy is included in the Consultation and information document at Appendix I.
- 2.6.2 Overall, the assessment concludes that the ES will have a minor positive impact Londonwide in the short term. Its purpose is to act as a 'stepping stone' ahead of the full introduction of the ULEZ, when tighter vehicle emissions standards will come into force. It is made clear that, with this scheme, the Mayor intends to take action quickly on air quality.

### **3. Description of the consultation suggestions for the future of the Ultra Low Emission Zone (ULEZ)**

#### **3.1 Introduction**

3.1.1 This chapter summarises the consultation suggestions for the ULEZ's future. These are set out in more detail in the Consultation and information document attached as Appendix I.

#### **3.2 The confirmed ULEZ**

3.2.1 The ULEZ was confirmed by the previous mayoral administration in February 2015. A brief summary of the confirmed scheme is provided here, with a more detailed description included in the Consultation and information document.

3.2.2 From September 2020, all cars (except taxis, which are subject to environmental requirements through the taxi licensing system), motorcycles, vans, minibuses, buses, coaches and HGVs will need to meet exhaust emissions standards or pay a daily charge, when travelling in central London.

3.2.3 The ULEZ will cover the same area as the Congestion Charge zone and its standards are in addition to any Congestion Charge or LEZ charges that are already applied. The ULEZ will operate 24 hours a day, every day of the year, including weekends and public holidays.

#### **3.3 Overview of the consultation suggestions for the ULEZ's future**

3.3.1 No formal proposals for changes to the ULEZ are being put forward at this stage. Depending on feedback from this consultation and ongoing feasibility work, the Mayor will decide whether options should be pursued for further statutory consultation. The public and stakeholders will therefore have a further opportunity to comment.

**The Mayor wants to develop his proposals (illustrated in**

3.3.2 ) with the active involvement of Londoners and relevant stakeholders by considering:

- Bringing forward the introduction of the ULEZ to 2019 (currently planned for 2020)

- Extending the ULEZ Londonwide for heavy vehicles (HGVs, buses and coaches) as early as 2019, but possibly later
- Extending the ULEZ from central London up to the North and South Circular Roads for all vehicles<sup>14</sup> as early as 2019, but possibly later



**Central London ULEZ in 2019 (all vehicles)**



£100 per day



**Londonwide ULEZ, as early as 2019, but possibly later (heavy vehicles)**



Up to £100 per day



**Inner London ULEZ, as early as 2019, but possibly later (all vehicles)**



Up to £100 per day



Up to £12.50 per day

**ULEZ standards:** Petrol – Euro 4; Diesel – Euro 6/VI; Motorcycle and L-Cat – Euro 3

<sup>14</sup> The term 'all vehicles', as used here, refers to all the vehicles currently subject to the ULEZ in central London, which is due to start in September 2020

### **3.4 Bringing forward the ULEZ in central London to 2019**

3.4.1 Currently, the ULEZ will apply in the same area as the Congestion Charging zone and is scheduled to start in September 2020. It is likely we can improve air quality in London sooner by bringing forward this launch date and one of the consultation suggestions is that it should start in 2019 instead (the exact date in 2019 has not been determined yet).

#### ***Impact on emissions***

3.4.2 An earlier implementation of the ULEZ would mean Londoners see the emissions and health benefits sooner. If the scheme were to be introduced in 2019, there would be a 25 per cent reduction in NO<sub>x</sub> in 2018, as people start to comply early in preparation for the launch. There would then be a 40 per cent reduction in 2019 on top of what would already have been achieved by ULEZ implementation in 2020.

3.4.3 Emissions savings would then continue in line with those estimated for the ULEZ in 2020 (ie nearly a 50 per cent reduction in central London road transport NO<sub>x</sub> emissions in 2020).

### **3.5 Londonwide ULEZ standards for heavy vehicles**

3.5.1 The Stage 2 consultation contained ideas for extending the ULEZ emissions standards for heavy vehicles out to the Londonwide LEZ boundary. This would require all heavy vehicles to meet the Euro VI standard or pay a daily charge.

3.5.2 Expanding the ULEZ emissions standards Londonwide for heavy vehicles is being considered because they are, on average, the most polluting. In addition, unlike in central London, the locations of high pollution in outer London mostly occur along the main roads, where most heavy vehicle kilometres are driven, and where there are a higher proportion of these vehicles.

3.5.3 The Stage 2 consultation also sought views on possible dates for when an extended zone for heavy vehicles could be implemented.

3.5.4 If a Londonwide scheme were to be taken forward, it would follow the current LEZ boundary. This is well-established and has infrastructure and systems in place to operate the scheme.

#### ***Charge levels, discounts and exemptions***

3.5.5 Charge levels and the appropriate discounts and exemptions for an extended Londonwide zone for heavy vehicles will be considered further as part of the development of policy options over the next year. It is expected that these will broadly be the same as the exemptions to the current LEZ, but consideration on the interaction between the LEZ and central London ULEZ charges, discounts and exemptions will also need to be given.

### ***Impact on emissions***

- 3.5.6 Early indications are that the outer zone will experience significant emissions reductions, assuming levels of compliance are on a par with those forecast for the central zone.
- 3.5.7 Heavy vehicles are forecast to contribute around 35 per cent of road transport NO<sub>x</sub> emissions across the Capital in 2020, equivalent to around 3,800 tonnes (major roads only). A Londonwide zone for Euro VI heavy vehicles would reduce emissions from these vehicles by up to 60 per cent (or around 30 per cent from total road transport emissions).
- 3.5.8 Earlier implementation of the scheme means emissions savings for more years and greater health benefits across London. These estimates will be refined as the policy develops and will be updated for the statutory consultation later in the year.

### **3.6 Expanding the ULEZ for all vehicles to inner London**

- 3.6.1 Inner London contains areas with significant NO<sub>2</sub> levels resulting in high population exposure to concentrations above health limits. Expanding the ULEZ would mean that significantly more people would benefit from improvements in air quality.
- 3.6.2 Therefore, the Stage 2 consultation included a suggestion for expanding the ULEZ to inner London for all vehicles currently subject to the confirmed central London ULEZ. Emissions standards that apply for the central London ULEZ would therefore be extended across a wider area.
- 3.6.3 Such an expansion might see it cover the area up to, but not including, the North and South Circular Roads (A205 and A406). It would require all vehicles to meet the ULEZ emissions standards or pay a daily charge. The precise boundary would be confirmed as part of any future statutory consultation on the matter.
- 3.6.4 Including the North and South Circular Roads in the extended ULEZ is not being suggested because it would mean they could not be used as diversion routes. Also, initial traffic modelling has indicated this would lead to diversions along less suitable residential roads.
- 3.6.5 In the event the Mayor wishes to progress this idea, we will undertake further consideration of the charge levels, the appropriate discounts and exemptions and the date of implementation for a scheme in order to develop a full proposal for statutory consultation.
- 3.6.6 The Stage 2 consultation sought views on the most appropriate implementation date for any inner London zone. To establish an appropriate date, we need to balance the numbers of vehicles affected and the cost of compliance and implementation with the need to take urgent action on air pollution and progress other relevant objectives from the Mayor's Transport Strategy.

### ***Indicative emissions impact***

- 3.6.7 The emissions reductions resulting from changes in the age of the vehicle fleet would vary depending on when any inner London zone is implemented. The sooner it is introduced, the greater the benefits would be, with a reduction in later years. This is because vehicles are 'naturally enhanced' (replaced with newer, less polluting vehicles) over time, so fewer need to be changed.
- 3.6.8 A 40 per cent reduction in inner zone road transport NO<sub>x</sub> emissions is estimated if the zone is implemented in 2019 – equivalent to approximately 1,500 tonnes of NO<sub>x</sub>. If it was implemented in 2022, this would fall to around 900 tonnes, decreasing again in later years.

## **4. The Stage 2 consultation process**

### **4.1 Introduction**

- 4.1.1 This chapter provides an overview of the Stage 2 consultation, as well as a description of the actions and communication methods employed to promote the consultation itself and elicit views from the public and stakeholders about the proposals.
- 4.1.2 The primary objective of the consultation process was to understand the views of the public and stakeholders concerning the statutory proposals for the ES and the non-statutory consultation suggestions about the future of the ULEZ, including potentially bringing forward the introduction in central London to 2019 and extending the zone. This report sets out the feedback from the consultation process which aims to inform the Mayor's decision-making process.
- 4.1.3 The first Mayor of London issued statutory guidance to TfL detailing consultation practice, entitled 'Guidance from the Mayor of London on charging schemes pursuant to schedule 23 of the Greater London Authority Act 1999'. This guidance informed the consultation strategy in advance of implementation.

### **4.2 Consultation stages**

- 4.2.1 This consultation was the second stage of an ongoing series of consultations on proposals to improve air quality.
- 4.2.2 In the summer of 2016, the Mayor undertook the first stage of consultation on a number of initiatives to improve the quality of the air and the health of Londoners.

### **4.3 Dates**

- 4.3.1 The Stage 2 consultation commenced on Monday 10 October 2016 and closed on Sunday 18 December 2016.

### **4.4 Publicising the consultation**

- 4.4.1 A marketing campaign was developed to raise awareness of the air quality consultation and encourage customers to have their say.
- 4.4.2 The consultation included new proposals to improve air quality and sought feedback on the introduction of a new ES and other ideas for improving the ULEZ. The campaign included:
- A press release, issued on 10 October, to announce the start of the consultation. The consultation received media coverage from a number of outlets including print coverage in the Evening Standard and City A.M.; coverage in trade publications such as Local

Transport Today, Coach & Bus Week and Fleet World; web coverage on BBC News, Bloomberg, Air Quality News and Business Green; as well as in local publications such as Get West London; and broadcast coverage on BBC and ITV local bulletins

- Press adverts in a variety of London media titles including the Evening Standard, Metro and City A.M. Adverts were also featured in the trade press and digital displays were used throughout the consultation
- A notice published in The London Gazette
- Social media activity such as tweets sent from the @TfL Twitter feed throughout the consultation period
- Detailed information about the scheme, supporting documents and an online questionnaire on TfL's consultation portal website at [tfl.gov.uk/airquality-consultation](http://tfl.gov.uk/airquality-consultation) and this was signposted with banners throughout the TfL website
- A radio advertisement notifying listeners of the air quality consultation which ran for five weeks across the following radio stations: Capital, Heart, Kiss, LBC, Magic, Radio X London and talkSPORT

#### 4.5 Targeted communications to registered Congestion Charge and other Transport for London (TfL) customers

4.5.1 On 12 October 2016, we sent an email to relevant registered Congestion Charging scheme customers using a customer relationship management system. Around 800,000 customers were emailed on two occasions (October 2016 and December 2016), as shown in Table 2. The reminder email was sent on 2 December 2016.

**Table 2: Numbers of emails sent to customers**

Customer type	Customers contacted October 2016	Customers contacted December 2016
Congestion Charge fleets /LEZ	24,174	19,360
Drivers	434,521	306,831
Cyclists	252,553	177,660
Taxis and private hire vehicles (PHVs)	94,262	58,332
<b>Total</b>	<b>805,510</b>	<b>562,183</b>

## **4.6 Stakeholder communications and meetings**

- 4.6.1 We engaged with stakeholders both in developing the proposals (prior to consultation) and during the consultation itself. We met with a wide range of stakeholders through private briefings, workshops and third-party events.
- 4.6.2 The Mayor first announced his intention to introduce an ES and to consider both accelerating and expanding the ULEZ in June 2016. An online public survey was launched in July 2016 to gather feedback on these policies as well as a range of other policies. We supported this with an email to over 500 stakeholders promoting the survey.
- 4.6.3 Between the launch of the survey in July and the beginning of the consultation period in October 2016, we met a number of stakeholders from a range of sectors to gather feedback and help further define the proposals.
- 4.6.4 A stakeholder breakfast briefing was held on 18 October 2016 as part of the consultation and was attended by 43 stakeholder organisations. Representatives of TfL and the GLA presented the detail of the ES and the ULEZ potential proposals, and also provided an opportunity for stakeholders to ask questions about the schemes and ideas.
- 4.6.5 The public consultation was supplemented by further engagement with stakeholder organisations, as set out in Appendix E. This was to ensure that stakeholders were well briefed about the potential timetable for the proposed changes, to understand their issues and concerns, and to encourage participation in the consultation.
- 4.6.6 We identified key stakeholder organisations including the 33 London boroughs (including the City of London Corporation), London Councils, the Metropolitan Police Authority, business representative organisations, freight and haulage representative organisations, transport and environment representative organisations, NHS trusts and Clinical Commissioning Groups, government departments including the Environment Agency and other non-departmental bodies, trade and professional associations, London TravelWatch, London Assembly members and organisations representing the local community and voluntary sectors.
- 4.6.7 On the consultation launch date, we emailed 553 stakeholder contacts with a summary of the proposals and a link to our consultation portal (see Appendix B). This email also invited stakeholders to meet us for a further more detailed briefing if they wished to. A further email was also sent out to our database of taxi and private hire vehicle operators.
- 4.6.8 London boroughs were briefed in advance of the consultation at our regular Sub-Regional Panels and during the consultation at two bespoke London Councils meetings which allowed the boroughs to feedback specific ideas and concerns.
- 4.6.9 The policies and consultation were raised and discussed at a number of pre-existing events including the TfL Freight Forum, Freight in the City, the

Licensed Private Hire Car Association (LPHCA) Roadshow, the British Vehicle Rental and Leasing Association (BVRLA) policy forum and Greener by Design.

#### **4.7 Borough engagement group**

- 4.7.1 In their responses to the consultation on the currently confirmed ULEZ scheme held in 2014 and 2015, a number of boroughs requested variations to and expansion of the ULEZ boundary. London Councils requested that the Mayor and TfL work with the London boroughs who wished to see the ULEZ expanded into their areas.
- 4.7.2 Sir Peter Hendy, then Commissioner of TfL, wrote to the Chair of the London Councils Transport Environment Committee on 9 May 2015 committing TfL to work with London local authorities on undertaking feasibility work to understand how an expanded ULEZ after 2020 could be delivered.
- 4.7.3 Following this, we organised an engagement event on 30 July 2015, attended by officers representing TfL, GLA, London Councils and 23 boroughs (all boroughs were invited). As a result of this meeting, it was agreed to set up an engagement group with a smaller number of boroughs to ensure close working and assist in the development of options as the work progressed.
- 4.7.4 The group comprises 12 representatives, a mixture of transport and air quality officers, spread across Sub-Regional Transport Forums and Air Quality Cluster Groups. Boroughs are responsible for disseminating information to colleagues via these forums.
- 4.7.5 The group has met five times since its formation, and has continued under the current Mayoral administration. It last met on 11 October 2016. Further background to the work of the group is provided in a paper to the London Councils' Transport and Environment Committee on the 10 December 2015 (item 5)<sup>15</sup>.

#### **4.8 Letters/mailings sent**

- 4.8.1 In addition to the stakeholder engagement outlined above, customised letters were sent to residents of the Congestion Charging zone.

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<sup>15</sup> <http://www.londoncouncils.gov.uk/node/25706>

## **4.9 The consultation portal**

4.9.1 Our online consultation portal ([www.tfl.gov.uk/airquality-consultation](http://www.tfl.gov.uk/airquality-consultation)) hosted all the relevant information relating to the consultation. This included summary information on the proposals for the ES and the ULEZ, supporting maps, diagrams and charts and details about the proposed ES standards, operational information, charge levels and location. The portal also included a link to the following documents which provided more detailed information on the proposals:

- Consultation and information document
- Emissions Surcharge Variation Order
- Consolidated CC Scheme Order showing ES related amendments (in the event they are confirmed)

4.9.2 During the consultation period, there were 63,191 unique visitors to the air quality consultation page.

4.9.3 Respondents were asked to complete and submit an online questionnaire to provide their feedback about the proposals. It included a number of open and closed questions providing the opportunity for respondents to indicate their views about each of the proposals and ideas as well as give additional comments and feedback.

## 5. Public and business responses to the consultation

### 5.1 Introduction

5.1.1 This section of the report provides a summary of the information collected from the responses received from the general public (not stakeholders) through the online consultation questionnaire. In general, the data presented here is from questions 15 to 25 (see Appendix D), although information about individual email addresses, business names and the consultation process is not presented. In each table, the total of the percentages is 100 per cent prior to rounding.

5.1.2 In total, 15,480 responses to the consultation from the public and businesses. We offered a number of ways for respondents to comment on the consultation:

- Online – through the consultation portal
- Email – comments emailed directly to TfL
- Post – by letter or return of a hard copy questionnaire

**Table 3: Consultation responses by response method**

<b>Response method</b>	<b>Number of responses</b>	<b>Percentage</b>
Online (consultation portal)	14,971	96.5%
Email	462	3%
Letter	47	0.5%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

### 5.2 Respondent type

5.2.1 Public, business, taxi and PHV respondents were asked to indicate in what capacity they were responding to the consultation; that is whether they were representing themselves or another business or organisation. Respondents were free to identify themselves as any of these categories. It should be noted that where 'government organisation', 'community or voluntary organisation' 'businesses' or 'campaign group' was selected, we undertook a check to see if any of these were stakeholders and these respondents were then transferred to the stakeholder analysis in this report.

**Table 4: Consultation responses by respondent type**

<b>Respondent type</b>	<b>Number of responses</b>	<b>Percentage</b>
As an individual	13,553	88%
As a taxi (black cab) owner/driver	160	1%
As a PHV (minicab) owner/driver/operator	79	0.5%
As a representative of a business	497	3.2%
As a representative of a community or voluntary organisation	81	0.5%
As a representative of a government organisation	9	0.1%
As a representative of a campaign group	29	0.2%
Other	250	1.6%
Not answered	822	5.3%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

### 5.3 Information channels

5.3.1 Respondents were also asked how they heard about the consultation.

**Table 5: Information channels through which respondents heard about the consultation (Question 21)**

<b>Respondent type</b>	<b>Number of responses</b>	<b>Percentage</b>
Received an email from TfL	8,094	52.3%
Received a letter from TfL	360	2.3%
Read about it in the press	1,197	7.7%
Social media	2,613	16.9%
Saw it on the TfL website	399	2.6%
At the Regent Street Motor Show	10	0.1%
Other	1,572	10.2%
Not answered	1,235	8.0%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

5.3.2 'Other' information channels included television, direct emails from stakeholders and through search engines.

## 5.4 Transport usage

5.4.1 Respondents were asked to indicate which forms of transport they use in central London; they could tick as many of the options as applied.

**Table 6: Modes of transport used by respondents (Question 23)**

<b>Respondent type</b>	<b>Number of responses</b>	<b>Percentage</b>
Vehicles for private use	7,464	48.2%
Vehicles for commercial use	1,285	8.3%
Taxi (black cab)	4,253	27.5%
PHV (mini cab)	3,207	20.7%
Tube	12,494	80.7%
Bus	10,219	66%
Walk	11,445	73.9%
Bike	5,974	38.6%
Other	1,577	10.2%

5.4.2 'Other' modes of transport include motorbike, the Docklands Light Railway and commuter coach.

## 5.5 Driver behaviour

5.5.1 Respondents were asked about their driving behaviour. The questionnaire sought information on whether respondents drove within the Congestion Charging zone and if so, how often. The Congestion Charging zone is the area proposed for the ES.

**Table 7: Public and business respondent frequency of driving in the Congestion Charging zone (Question 24)**

<b>Frequency</b>	<b>Number of responses</b>	<b>Percentage</b>
Every day	664	4.3%
1–2 days a week	787	5.1%
3–6 days a week	1,059	6.8%
1–2 days a month	1,588	10.3%
Less than once a month	4,944	31.9%
Never	5,748	37.1%
Not answered	690	4.5%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

5.5.2 In addition, respondents were asked to provide information about their driving behaviour in the area inside the North and South Circular Roads. This is the area proposed for any expanded inner London ULEZ (affecting all vehicles).

**Table 8: Public and business respondent frequency of driving in the area inside the North and South Circular Roads (Question 25)**

<b>Frequency</b>	<b>Number of responses</b>	<b>Percentage</b>
Every day	2,123	13.7%
1–2 days a week	2,037	13.2%
3–6 days a week	2,581	16.7%
1–2 days a month	2,171	14%
Less than once a month	3,248	21%
Never	2,659	17.2%
Not answered	661	4.3%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

## 6. Analysis of public responses

### 6.1 Introduction

6.1.1 This chapter provides an analysis of the feedback from the public, community and businesses. A quantitative and qualitative analysis of the data received under each proposal is provided. A copy of the questionnaire is at Appendix D.

6.1.2 The proposals and the responses to them are considered in the following order:

- The principle of introducing a new daily £10 ES
- Introducing the ES from 23 October 2017
- Providing a 90 per cent residents' discount for the ES
- The exemption of historic class vehicles and Showman's vehicles
- The inclusion of L-Category vehicles (three-wheelers and quadricycles) and 9+ seater vehicles (coaches and buses)
- Introducing the ULEZ in Central London from 2019
- The principle of expanding the ULEZ up to (but not including) the North and South Circular Roads for all vehicles
- When the expansion of the ULEZ up to (but not including) the North and South Circular Roads for all vehicles should be introduced
- The charge level for an expanded ULEZ up to (but not including) the North and South Circular Roads for all vehicles
- The principle of expanding the ULEZ Londonwide for heavy vehicles
- When the expansion of the ULEZ Londonwide for heavy vehicles should be introduced

#### ***Quantitative analysis of closed questions***

6.1.3 For each proposal and scheme idea, an analysis of the closed questions contained within the questionnaire is provided. The number of respondents and the proportion of support and opposition or preferences are set out. These are cross-referenced with key respondent characteristics, such as whether they drive in a particular zone, for those that state they do this. The question numbers from the questionnaire are also referenced within the title of each sub-section.

6.1.4 In the explanatory text, the percentage for the proportions supporting the proposal includes those who stated that they 'strongly support' and 'support' each proposal. The percentage for those opposing the schemes likewise includes those who 'strongly oppose' and 'oppose' the proposal. A full breakdown of these categories is provided in the tables and charts.

6.1.5 Because of the rounding, please note that some of the percentage totals may be approximately one per cent out (ie 99 or 101 per cent). In all cases, the totals equal 100 per cent prior to rounding, ie 15,480 respondents.

***Qualitative analysis of free text responses (open question)***

6.1.6 The questionnaire contained a free text box to enable respondents to comment or make suggestions regarding any or all of the proposals. All comments and suggestions received were reviewed and coded in order to identify common themes raised by respondents.

6.1.7 Where possible the free text responses have been split by comments concerning the ES proposals and the ULEZ ideas.

6.1.8 For clarity, these comments are organised underneath each identified theme. The qualitative analysis also identifies the percentage of overall public and business comments related to each theme, calculated by using the total number of respondents.

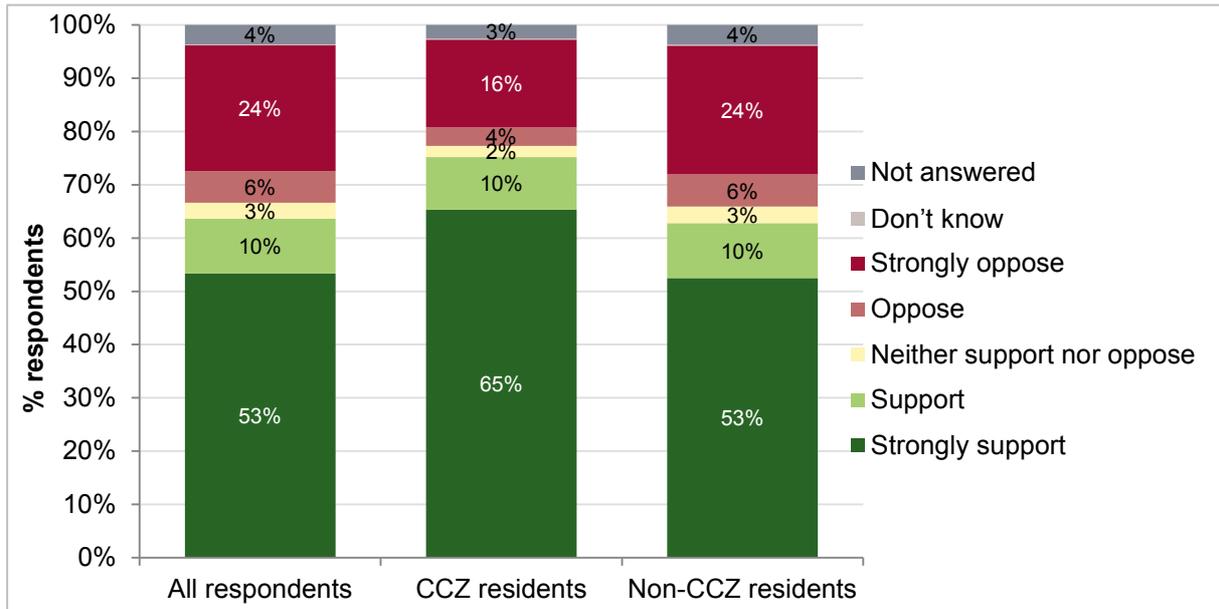
6.1.9 Our response to the main comments and suggestions raised in the open text section of the questionnaire are provided in Chapters 9 to **Error! Reference source not found.** of this report.

**6.2 Question 1: Principle of the Emissions Surcharge**

6.2.1 Table 9 sets out the level of support from the general public for the proposal to introduce a new ES to discourage the use of older, more polluting vehicles in central London in order to improve air quality and health. Sixty-four per cent of respondents support this proposal with 30 per cent of respondents in opposition. Three per cent of respondents didn't have a view either way and 4.2 per cent either didn't know or didn't respond.

**Table 9: The introduction of an ES in central London**

<b>Response</b>	<b>Count</b>	<b>%</b>
Strongly support	8,259	53%
Support	1,591	10%
Neither support or oppose	465	3%
Oppose	916	6%
Strongly oppose	3,656	24%
Don't know	31	0.2%
Not answered	562	4%
<b>Total</b>	<b>15,480</b>	<b>100%</b>



**Figure 2: Opinion on the introduction of the ES in the context of whether respondents live within or outside the proposed zone**

### 6.3 Question 2: Implementation date of the Emissions Surcharge

6.3.1 Table 10 sets out the level of support from the general public for the proposal to introduce a new ES from 23 October 2017. The question asked if the respondent agreed with the proposed implementation date. Fifty-nine per cent of respondents agreed with the proposed implementation date, whilst 24 per cent didn't think that the ES should be introduced. Twelve per cent believed that people need more time to comply whilst five per cent either didn't know or didn't answer the question.

**Table 10: Introducing the ES from 23 October 2017**

Response	Count	%
Yes	9,056	59%
I do not think an ES should be introduced	3,735	24%
No – people need more time to comply	1,900	12%
Don't know	209	1%
Not answered	580	4%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

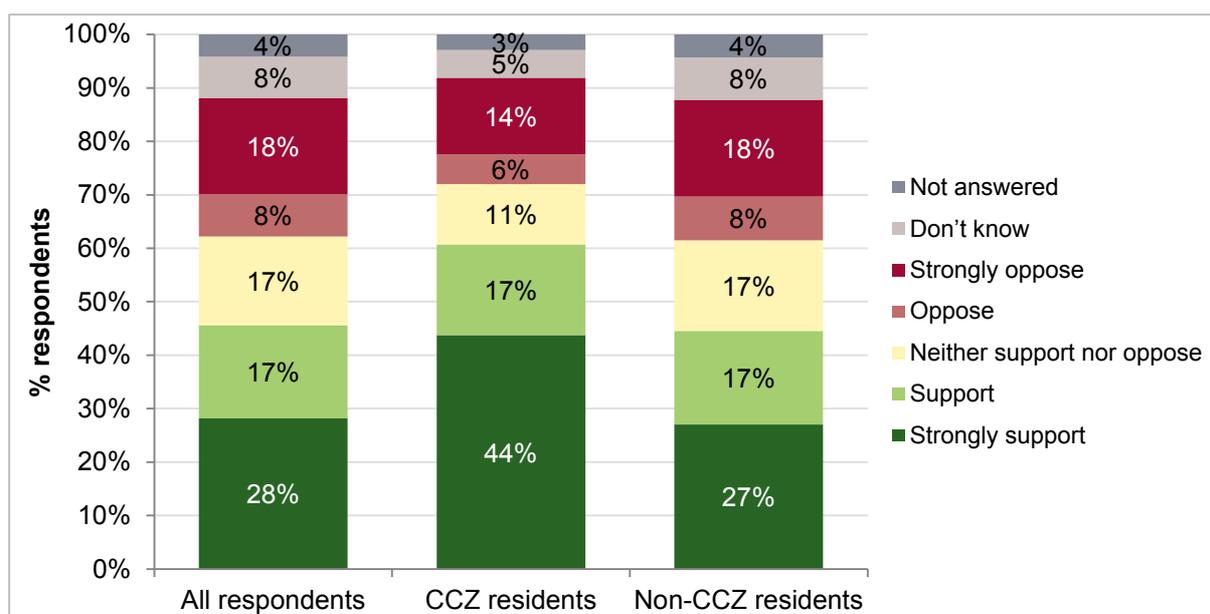
### 6.4 Question 3: Residents paying the Emissions Surcharge at a discounted rate

6.4.1 Table 11 sets out the level of support from the general public for the proposal to make residents liable for the ES at a discounted rate throughout

the ULEZ 'sunset' period. Forty-four per cent of respondents support this proposal, whilst 26 per cent oppose it. Twenty-nine per cent of respondents neither support or oppose, or don't know or didn't answer the question.

**Table 11: Residents paying a discounted rate of the ES throughout the ULEZ 'sunset period'**

Response	Count	%
Strongly support	4,357	28%
Support	2,699	17%
Neither support or oppose	2,572	17%
Oppose	1,236	8%
Strongly oppose	2,765	18%
Don't know	1,204	8%
Not answered	647	4%
<b>Total</b>	<b>15,480</b>	<b>100%</b>



**Figure 3: Opinion on whether residents should be liable for a discounted ES charge during the ULEZ 'sunset period' in the context of whether respondents live within or outside the proposed zone**

## 6.5 Question 4: Exemption of historic vehicles

6.5.1 Table 12 sets out the level of support from the general public for the proposal to exempt historic tax class vehicles from the ES. Thirty-seven per cent of respondents support the exemption whilst 39 per cent oppose it. Twenty-four per cent of respondents neither support or oppose, or don't know or didn't answer the question.

**Table 12: Exemption of historic tax class vehicles**

<b>Response</b>	<b>Count</b>	<b>%</b>
Strongly support	3,526	23%
Support	2,097	14%
Neither support or oppose	2,396	15%
Oppose	2,427	16%
Strongly oppose	3,514	23%
Don't know	839	5%
Not answered	681	4%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

## **6.6 Question 5: Exemption of Showman's vehicles**

6.6.1 Table 13 sets out the level of support from the general public for the proposed exemption of Showman's vehicles from the ES. Twenty per cent of respondents support this proposal with 42 per cent of respondents in opposition. Twenty-two per cent of respondents didn't have a view either way and 16 per cent either didn't know or didn't respond.

**Table 13: Exemption of Showman's vehicles**

<b>Response</b>	<b>Count</b>	<b>%</b>
Strongly support	1,803	12%
Support	1,291	8%
Neither support or oppose	3,481	22%
Oppose	2,666	17%
Strongly oppose	3,832	25%
Don't know	1,688	11%
Not answered	719	5%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

## **6.7 Question 6: Inclusion of L-Category vehicles**

6.7.1 Table 14 sets out the level of support from the general public for the proposed inclusion of L-Category vehicles (eg three-wheelers and quadricycles). These vehicles currently pay the Congestion Charge. Fifty-three per cent of respondents support this proposal with 19 per cent of respondents in opposition. Nineteen per cent of respondents didn't have a view either way and 10 per cent either didn't know or didn't respond.

**Table 14: Inclusion of L-Category vehicles**

<b>Response</b>	<b>Count</b>	<b>%</b>
Strongly support	4,603	30%
Support	3,622	23%
Neither support or oppose	2,886	19%
Oppose	1,204	8%
Strongly oppose	1,691	11%
Don't know	770	5%
Not answered	704	5%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

## 6.8 Question 7: Inclusion of 9+ seater vehicles

6.8.1 Table 15 sets out the level of support from the general public for the proposed inclusion of 9+ seater vehicles (including coaches, buses and minibuses). Sixty-four per cent of respondents support the inclusion of all 9+ seater vehicles, six per cent support the inclusion of buses and coaches only, and one per cent supports the inclusion of minibuses only. Eight per cent of respondents oppose the inclusion of all 9+ seater vehicles, four per cent oppose the inclusion of buses and coaches only and three per cent the inclusion of minibuses only. Seven per cent of respondents didn't have a view either way and six per cent either didn't know or didn't respond.

**Table 15: Inclusion of 9+ seater vehicles**

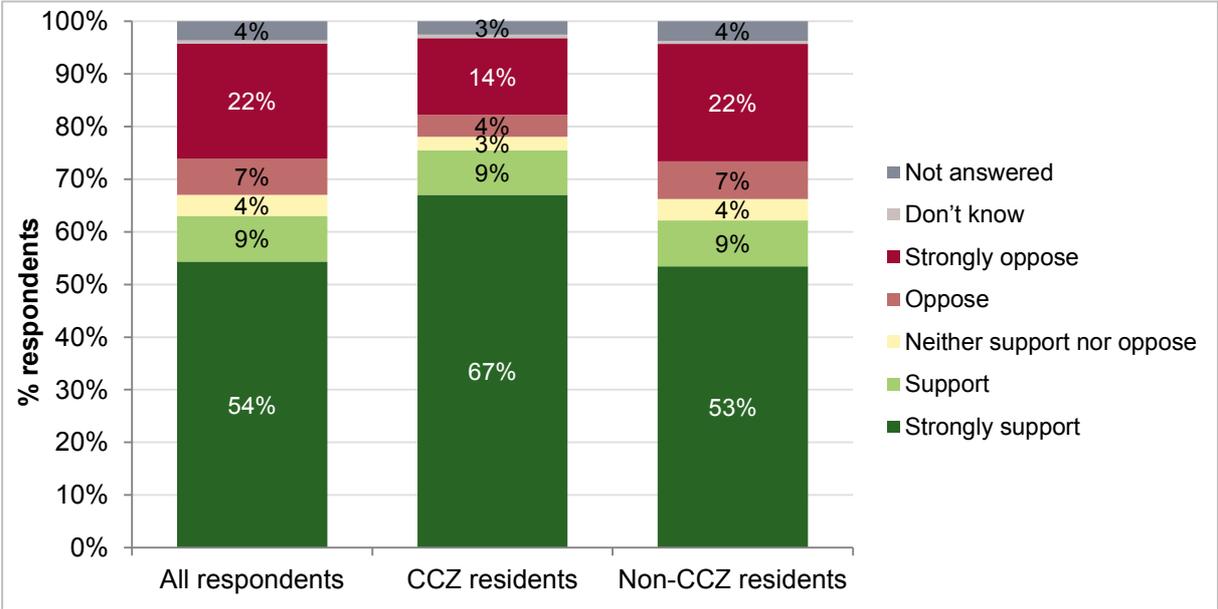
<b>Response</b>	<b>Count</b>	<b>%</b>
Support the inclusion of all 9+ seater vehicles	9,873	64%
Support the inclusion of coaches and buses only	922	6%
Support the inclusion of minibuses only	205	1%
Oppose the inclusion of all 9+ seater vehicles	1,256	8%
Oppose the inclusion of coaches and buses only	587	4%
Oppose the inclusion of minibuses only	418	3%
Neither support nor oppose	1,095	7%
Don't know	518	3%
Not answered	606	3%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

**6.9 Question 8: Early implementation of the ULEZ**

6.9.1 Table 16 sets out the level of support from the general public for bringing forward the implementation of the ULEZ in central London to 2019 to improve air quality and health. Sixty-three per cent of respondents support this proposal with 29 per cent of respondents in opposition. Four per cent of respondents didn't have a view either way and four per cent either didn't know or didn't respond.

**Table 16: Early implementation of the ULEZ in central London**

Response	Count	%
Strongly support	8,413	54%
Support	1,347	9%
Neither support or oppose	611	4%
Oppose	1,076	7%
Strongly oppose	3,377	22%
Don't know	92	0.5%
Not answered	564	3.5%
<b>Total</b>	<b>15,480</b>	<b>100%</b>



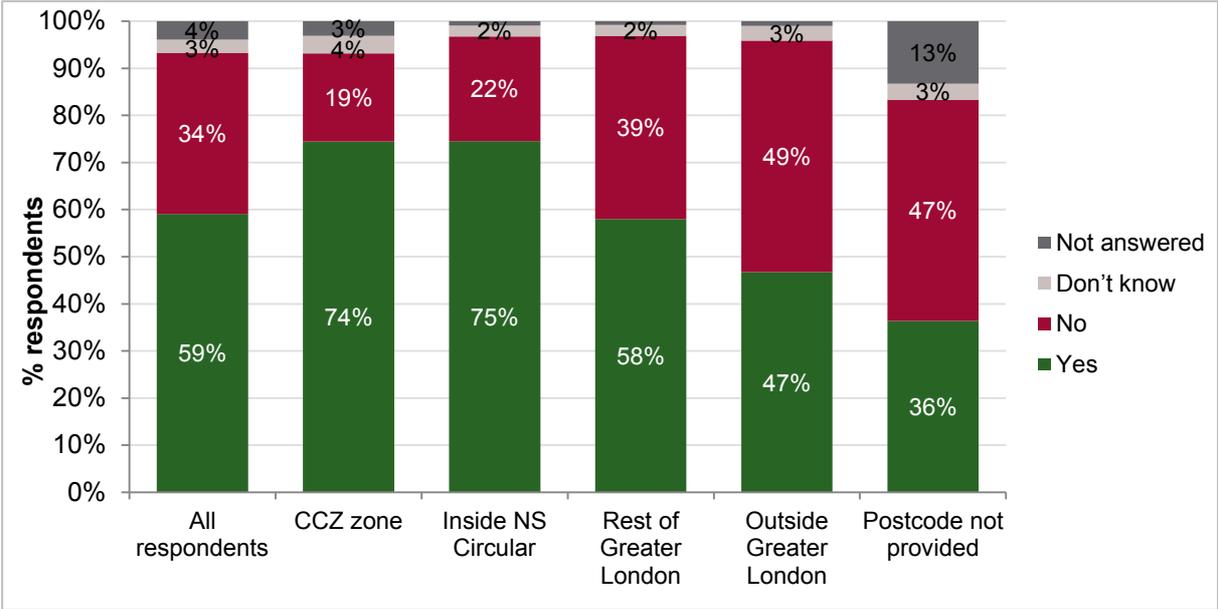
**Figure 4: Opinion on whether the ULEZ in central London should be brought forward to 2019 in the context of whether respondents live within or outside the proposed zone**

**6.10 Question 9: Principle of expansion of the ULEZ to the North and South Circular Roads**

6.10.1 Table 17 sets out the level of support from the general public for the overall principle of expanding the ULEZ up to (but not including) the North and South Circular Roads for all vehicles. Fifty-nine per cent of respondents support this principle with 34 per cent of respondents in opposition. Three per cent of respondents didn't know and four per cent didn't respond.

**Table 17: Extending the ULEZ to the North and South Circular Roads**

Response	Count	%
Yes	9,150	59%
No	5,297	34%
Don't know	422	3%
Not answered	611	4%
Total	15,480	100%



**Figure 5: Opinion on whether the ULEZ should be extended up to (but not including) the North and South Circular Roads (all vehicles) in the context of the respondents' area of residence**

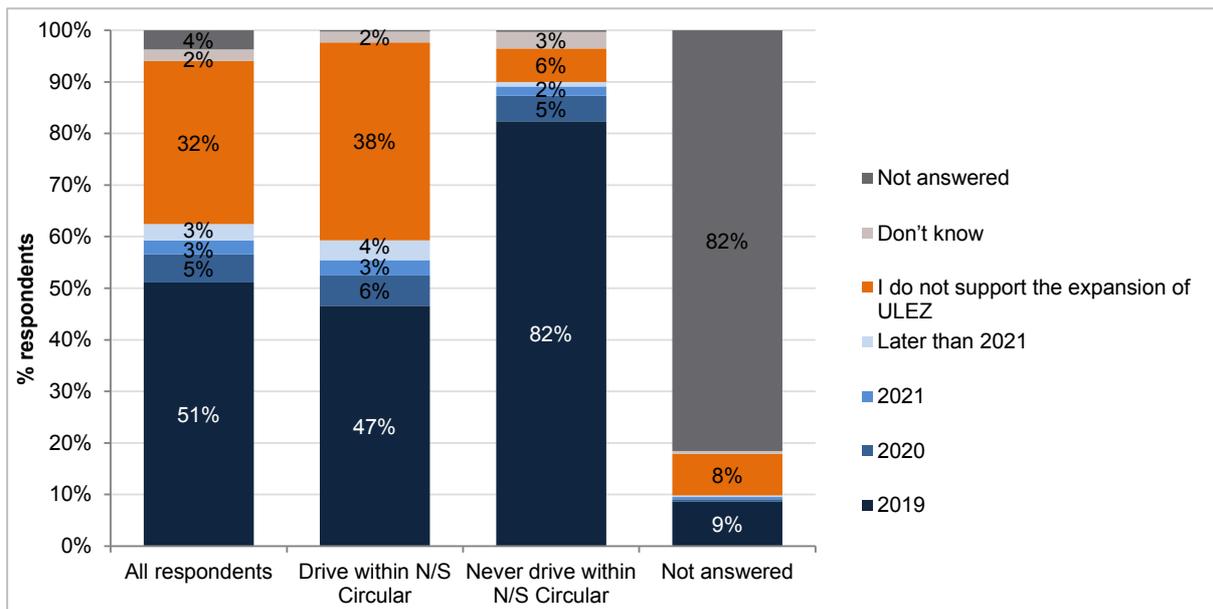
**6.11 Question 10: Date of the ULEZ expansion to the North and South Circular Roads**

6.11.1 Table 18 sets out the general public views as to when an expanded ULEZ up to (but not including) the North and South Circular Roads should be introduced. Fifty-one per cent thought that it should be introduced in 2019,

five per cent in 2020 and three per cent in 2021. Three per cent of respondents thought it should be introduced later than 2021 whilst 32 per cent didn't support the expansion of the ULEZ. Five per cent of respondents either didn't know or didn't answer the question.

**Table 18: Date for introducing the expanded ULEZ**

Response	Count	%
2019	7,917	51%
2020	844	5%
2021	417	3%
Later than 2021	488	3%
I do not support the expansion of the ULEZ	4,895	32%
Don't know	344	2%
Not answered	575	3%
<b>Total</b>	<b>15,480</b>	<b>100%</b>



**Figure 6: Opinion on when the ULEZ should be extended to the North and South Circular Roads (all vehicles) in the context of whether respondents drive within the proposed zone**

## 6.12 Question 11: Charge level for the expanded zone

6.12.1 Table 19 sets out general public views as to what the daily ULEZ charge should be within an expanded ULEZ (ie the area between the Congestion Charging zone and up to, but not including the North and South Circular

Roads). It is recognised that by expanding the zone, the scheme would affect many more cars, vans and motorcyclists. The charge is currently proposed to be £12.50 within central London. Forty per cent of respondents stated that the charge level should be the same as the central area at £12.50 and 23 per cent thought it should be set at a lower rate. Thirty-three per cent of respondents did not support the expansion of the ULEZ and four per cent did not answer the question.

**Table 19: Charge level for the expanded ULEZ**

<b>Response</b>	<b>Count</b>	<b>%</b>
The daily charge should be the same for light vehicles at £12.50	6,174	40%
The daily charge should be lower than £12.50 for light vehicles	3,559	23%
I do not support the expansion of the ULEZ	5,131	33%
Not answered	616	4%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

### **6.13 Question 12: Principle of a Londonwide expansion for heavy vehicles**

6.13.1 Table 37 sets out the level of support for the overall principle of expanding the ULEZ Londonwide for heavy vehicles. Seventy-three per cent of respondents support the principle, whilst 18 per cent oppose it. Four per cent of respondents didn't have a view either way and six per cent either didn't know or didn't respond.

**Table 20: Extending the ULEZ Londonwide for heavy vehicles**

<b>Response</b>	<b>Count</b>	<b>%</b>
Strongly support	9,198	60%
Support	1,960	13%
Neither support or oppose	693	4%
Oppose	700	4%
Strongly oppose	2,221	14%
Don't know	114	1%
Not answered	594	4%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

### **6.14 Question 13: Date of the expansion for heavy vehicles**

6.14.1 Table 38 sets out general public views as to when an expanded Londonwide ULEZ for heavy vehicles should be introduced. Sixty per cent

thought that it should be introduced in 2019, seven per cent in 2020 and four per cent in 2021. Four per cent of respondents thought it should be introduced later than 2021 whilst 21 per cent didn't support the expansion of the ULEZ. Four per cent of respondents didn't answer the question.

**Table 21: Date for introducing the expanded ULEZ for heavy vehicles**

<b>Response</b>	<b>Count</b>	<b>%</b>
2019	9,300	60%
2020	1,104	7%
2021	594	4%
Later than 2021	547	4%
I do not support the expansion of the ULEZ	3,327	21%
Not answered	608	4%
<b>Total</b>	<b>15,480</b>	<b>100%</b>

## **6.15 Question 14: Written comments**

6.15.1 Question 14 of the questionnaire provided an opportunity for respondents to give their written comments on all of the proposals. Please see below for a summary of the analysis of free text responses, reported in themes. This was a wide-ranging consultation and therefore the comments made have been organised into a large number of sub-themes within each theme. For the sake of clarity, this chapter includes only the most popular sub-themes (made by more than one per cent of respondents). Appendix G has the full free text analysis.

## **6.16 Theme A: Emissions Surcharge**

6.16.1 In total, 3,520 comments were made on the principle of introducing both the ES and the ULEZ. We have included comments made about the ULEZ in this section as in some cases, it is harder to distinguish between comments made about the two separate schemes.

6.16.2 The results are shown in Table 22. The most common comments referred to supporting measures to tackle air quality and supporting the introduction of the ULEZ (seven per cent of respondents). Five per cent of respondents opposed the introduction of the ES and two per cent supported tougher measures to improve air quality. One per cent of respondents opposed the ULEZ because they believe that emissions from vehicle manufacturing outweigh any emissions savings.

**Table 22: Principle of introducing the ULEZ and the ES**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Support the introduction of the ULEZ	1,114	7%
Support measures to improve air quality in London	1,126	7%
Oppose the introduction of the ES	774	5%
Support tougher measures to improve air quality than those proposed	348	2%
Oppose the ULEZ because emissions from the manufacture of vehicles outweigh emissions savings	128	1%

## **6.17 Theme B: Discounts and exemptions**

6.17.1 There were 2,107 comments made on discounts and exemptions.

6.17.2 The results are shown in Table 23. The most common comments referred to supporting an exemption for motorcycles (three per cent of respondents). One per cent of respondents opposed the exemption for taxis and the residents' discount. One per cent of respondents supported an exemption for private cars.

**Table 23: Discounts and exemptions**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Support the exemption for motorcycles	479	3%
Support the exemption for private cars	116	1%
Oppose the exemption for taxis and private hire vehicles	153	1%
Oppose the residents' discount	117	1%

**6.18 Theme C: Impact of the proposals**

6.18.1 There were 1,823 comments about the impact of the proposals and ideas that were presented as part of the consultation. The results are shown in Table 24. The most common comments referred to concerns that the proposals disproportionately impact poorer people (seven per cent of respondents). Two per cent of respondents were concerned about the impact on small businesses and one per cent was concerned about the impact of the ES on owners of older vehicles.

**Table 24: Impact of the proposals**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Proposals will impact disproportionately on poorer people	1,010	7%
Concern about the impact on small businesses	331	2%
Concern about the ES on owners of older cars	158	1%

**6.19 Theme D: Timescales**

6.19.1 There were 1,436 comments about timescales. The results are shown in Table 25. The most common comments referred to requests to implement the proposals as soon as possible (seven per cent of respondents). One per cent of respondents asked for a ‘sunset period’ for businesses.

**Table 25: Timescales**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Implement proposals as soon as possible	1,056	7%
There should be a ‘sunset period’ for businesses	121	1%

**6.20 Theme E: Costs**

6.20.1 There were 1,381 comments about costs. The results are shown in Table 26. The most common comments referred to concerns that the ULEZ would be another tax (six per cent of respondents). One per cent of respondents raised the following concerns: that people would be required to frequently purchase a new vehicle; that commercial drivers would pass on the costs to consumers, and that the proposals would increase the cost of living.

**Table 26: Costs**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Concern that the ULEZ is another tax on motorists	889	6%
Concern about the requirement to frequently purchase a new vehicle	123	1%
Concern that commercial drivers will pass on the costs to consumers	150	1%
Concerns that proposals will increase the cost of living	155	1%

## **6.21 Theme F: Banning vehicles**

- 6.21.1 There were 1,217 comments about banning vehicles. Two per cent of respondents suggested that diesel vehicles should be banned and one per cent suggested that polluting vehicles should be banned rather than charged. The results are shown in Table 27.

**Table 27: Banning vehicles**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Ban diesel vehicles	294	2%
Ban polluting vehicles rather than charge them	180	1%

## **6.22 Theme G: Charging levels**

- 6.22.1 There were 967 comments about charging levels. Two per cent suggested that the ES should be based on emissions rather than the age of the vehicle and one per cent supported a higher charge for diesel vehicles. The results are shown in Table 28.

**Table 28: Charging levels**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
The ES should be determined on emissions	297	2%

rather than the age of a car		
Support a higher charge for diesel vehicles	125	1%

## 6.23 Theme H: Boundary

- 6.23.1 There were 963 comments about matters relating to boundaries. The results are shown in Table 29. Two per cent of respondents felt that the ULEZ should be Londonwide (to the M25), whilst one per cent of respondents either opposed or supported the expansion of the ULEZ up to the North and South Circular Roads.

**Table 29: Boundary**

Comment	Number of comments	Percentage of all respondents
The ULEZ should be Londonwide (to the M25)	307	2%
Oppose the expansion of the ULEZ up to the North and South Circular Roads	189	1%
Support the expansion of the ULEZ to the North and South Circular Roads	125	1%

## 6.24 Theme I: Financial assistance

- 6.24.1 There were 789 comments related to financial assistance. The results are shown in Table 30. Two per cent of respondents supported a shift to electric vehicles through subsidised cars, tax breaks etc. One per cent of respondents suggested that revenue raised from charging should be used for projects to improve air quality and one per cent supported a scrappage scheme.

**Table 30: Financial assistance**

Comment	Number of comments	Percentage of all respondents
Support a shift to electric vehicles with subsidised cars, tax breaks, the ability to use bus lanes, free parking, free charging points etc	260	2%

Revenue raised from charging should be used for projects to improve air quality	165	1%
Support a car scrappage scheme	218	1%

## 6.25 Theme J: Taxis and PHVs

6.25.1 There were 738 comments about taxis and PHVs. The results are shown in Table 32. Two per cent of respondents supported low emission taxis and PHVs, whilst one per cent of respondents suggested both banning polluting taxis and capping PHV numbers.

**Table 31: Taxis and PHVs**

Comment	Number of comments	Percentage of all respondents
Support for low emission taxis/PHVs	266	2%
Ban polluting taxis	116	1%
Cap PHV numbers	144	1%

## 6.26 Theme K: Emissions standards

6.26.1 There were 468 comments on emissions standards. One per cent of respondents raised concerns that central government has promoted diesel vehicles in recent years, and is now penalising them. Another one per cent of respondents raised concerns regarding the enforcement of standards, eg MOTs/manufacturers' claims. The results are shown in Table 32.

**Table 32: Emissions standards**

Comment	Number of comments	Percentage of all respondents
Concern that central government has promoted diesel vehicles in recent years, and is now penalising them	208	1%
Concern regarding the enforcement of standards, eg MOTs/manufacturers' claims	130	1%

## 6.27 Theme L: Consultation

6.27.1 One per cent of respondents raised generic criticisms of the air quality consultation.

## 6.28 Theme M: Suggested supporting policies

6.28.1 There were 4,355 comments about possible additional supporting policies. The results are shown in Table 33. Four per cent of respondents suggested both improving public transport and improving provision for cyclists, whilst three per cent supported low emission buses. Two per cent of respondents suggested banning idling and improving provision for electric vehicles. One per cent of respondents suggested addressing pollution from non-transport sources, planting more trees and/or encouraging wildlife.

**Table 33: Supporting policies**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Improve public transport	648	4%
Improve provision for cyclists, eg more cycle lanes and cycle parking, extending the Santander Cycles scheme	618	4%
Support for low emission buses	425	3%
Improve the pedestrian environment, eg more pedestrianisation, wider pavements	327	2%
Ban idling	251	2%
Improve provision for electric vehicles, eg more charging infrastructure	246	2%
Address pollution from non-transport sources, eg diesel generators, and improve home energy efficiency	143	1%
Plant more trees and encourage wildlife	147	1%

## 6.29 Theme N: Alternative policy suggestions

6.29.1 There were 1,571 comments that suggested alternative policies. The results are shown in Table 34. Four per cent of respondents suggested that improvements should be made to traffic flow, two per cent of respondents stated that they opposed investment in cycle infrastructure and one per cent stated that motorcycle use should be encouraged.

**Table 34: Alternative policy suggestions**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of all respondents</b>
Improve traffic flow, eg increase road space, reduce roadworks, reduce bus lanes, relocate cycle lanes, synchronise traffic lights	673	4%
Oppose investment in cycle lanes as they cause congestion and worsen pollution	257	2%
Encourage motorcycle use	159	1%

## 7. Campaign responses

### 7.1 Introduction

- 7.1.1 Throughout the consultation, we received a number of emails from members of the public as part of two separate stakeholder-led campaigns. These campaigns were led by Healthy Air and Greenpeace<sup>16</sup>.
- 7.1.2 In the case of both campaigns, respondents were provided with a template response which could be amended. Please see below for more detail about each of the two separate campaigns and an analysis of additional comments that were received.
- 7.1.3 A fuller analysis of the campaign responses is set out in Appendix H.

### 7.2 Healthy Air campaign

- 7.2.1 We received 955 responses as part of this campaign; 124 had been edited to provide additional comments. The template text for the Healthy Air campaign is shown in Figure 7.

Dear Sadiq Khan

You have taken another big step in the right direction with this announcement. Thank you.

By focusing on road transport and in particular diesel vehicles, you are demonstrating that you understand the urgency of addressing this public health crisis. However, you need to go further and faster to meet your legal and moral obligations to protect the people of London from harmful air pollution.

I welcome your proposal to introduce an expanded Ultra Low Emission Zone in 2019. However, I would like to see other options on the table, such as expanding the zone to the whole of greater London and restricting access to central London to zero emission vehicles.

You should extend the T-charge (for the most polluting vehicles) to all diesel cars. You should also consider including all diesel vehicles if an analysis shows this would meet compliance with legal air pollution limits in the shortest time possible.

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<sup>16</sup> Update: A previous version erroneously stated that Friends of the Earth led this campaign. This was corrected on 27 February

I urge you to seize this opportunity to put London on the path towards a cleaner, healthier and more sustainable future.

Thank you

**Figure 7: Template text for the Healthy Air email campaign**

7.2.2 We analysed the additional 126 comments received as part of this campaign. Details are below:

**Table 35: Additional comments received through the Healthy Air campaign**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of campaign respondents</b>
ULEZ should be London-wide (to M25)	91	10%
Support tougher measures on air quality than proposed	88	9%
Ban non-EVs from central London	87	9%
Support charge for all diesel vehicles regardless of age	84	9%
Support introduction of a ULEZ	77	8%

7.2.3 The campaign asked similar questions to our online questionnaire, but they were not consistent. These responses have not been counted as part of the analysis in Chapter 6. Details of these responses are set out in Appendix H.

### **7.3 Greenpeace campaign**

7.3.1 We received 12,920 responses as part of this campaign; 2,918 had been edited to provide additional comments. There were two different template emails for this campaign as shown in Figures 8 and 9 below:

Dear Mayor of London Sadiq Khan,

Like you, I agree that tackling air pollution in London has to be a top priority and I'm glad for the opportunity to take part in your 'Clean up

London's toxic air' consultation.

London is one of the worst cities in Europe for air pollution, and we need to change that – otherwise the death toll from air pollution will continue to rise.

I strongly agree with your proposal to introduce a new £10 Emissions Surcharge on the most polluting vehicles. This should be on top of the congestion charge and implemented in October 2017. Likewise I strongly support bringing forward the introduction of the Ultra Low Emission Zone to 2019. I agree with the proposal that it should go further out to the North and South Circular Roads at the very least. Additionally, the new ULEZ should apply to all trucks and lorries across Greater London.

If the most ambitious version is implemented at the earliest opportunity, it could stop the death toll from air pollution rising. We need to act fast to clean up London's toxic air.

Any proposals that are put in place to tackle air pollution need to be coupled with measures to ensure that the city is accessible, walking and cycling are supported, and the quality, cost and emissions of public transport are greatly improved. Where necessary we need to support small businesses with exemptions.

Everyone living and working in London should be helped to play their role in reducing air pollution.

Thank you for all your work so far. I look forward to seeing this plan in action.

**Figure 8: Greenpeace email campaign (version one)**

- 7.3.2 There were 3,237 responses received using the template text above that also included an additional sentence: I agree with the proposal that it should go further out to the North and South Circular Roads at the very least.

Dear Sadiq Khan,

I'm very concerned about air quality in London. I'm pleased you are proposing steps to improve it, but you must take stronger action to deal with our deadly air pollution crisis.

I welcome your proposal to introduce a Toxicity Charge (T-Charge) for the most polluting traffic. But the T-Charge needs to be widened to include all diesel cars, not only the oldest. Diesel vehicles present a severe threat to Londoners' health, and they must be phased out. I know that many people bought diesel cars before the dangers were widely known. So I support your call for a diesel scrappage scheme to help people move to clean vehicles, or take up alternatives to driving.

I also welcome your proposal to extend the Ultra Low Emission Zone (ULEZ), and introduce it earlier. However, extending the ULEZ only to the North and South Circular for all vehicles does not do enough to improve air quality in outer London. A carefully designed ULEZ should cover all types of vehicles across London, and should be combined with a pay-as-you-go driving scheme which differentiates between cleaner and dirtier vehicles.

As well as banishing dirty diesels from London, you must take steps to reduce vehicle numbers altogether, and make sure new infrastructure does not add to the problem. London needs more policies to provide alternatives to driving, including safer cycling and walking infrastructure, and more affordable public transport.

Earlier this month, the government was ordered by the High Court to act faster to clean up the UK's air. Londoners need you to stand up for us and do everything you can to bring down London's air pollution to legal limits as soon as possible.

**Figure 9: Greenpeace email campaign (version two)**

7.3.3 We analysed the additional 2,918 comments received as part of this campaign. The results are shown in Table 36.

**Table 36: Additional comments received through the Greenpeace campaign**

<b>Comment</b>	<b>Number of comments</b>	<b>Percentage of campaign respondents</b>
Support introduction of a ULEZ	2526	20%
Implement proposals as soon as possible	2482	19%
Improve provision for cyclists, e.g. more cycle lanes, cycle parking, extension of Santander Cycles scheme	2456	19%
Improve public transport	2433	19%
Improve pedestrian environment, e.g. pedestrianisation, wider pavements	2422	19%
Support measures to improve air quality in London	2294	18%

Support expanding ULEZ to North and South Circular roads	2206	17%
Concern regarding impact on small businesses	2054	16%

## 8. Stakeholder responses

### 8.1 Introduction

8.1.1 This chapter of the report looks at the feedback provided by stakeholder organisations. It includes an analysis of both quantitative and qualitative data.

8.1.2 Responses were received from 130 stakeholder organisations. A full list of these stakeholders is included at Appendix A and a summary of each stakeholder response is provided at Appendix C.

8.1.3 We have categorised these 130 stakeholders into respondent types as follows:

**Table 37: Stakeholder respondent type**

<b>Respondent type</b>	<b>Number of stakeholder responses</b>	<b>Percentage of stakeholder responses</b>
Political representatives	11	8.5%
Boroughs	25	19.2%
Other Local Authorities	2	1.5%
Government organisation	2	1.5%
Academic	2	1.5%
Business organisations / Business Improvement Districts (BIDS)	12	9.2%
Businesses	17	13.1%
Coach and bus operators	8	6.2%
Environmental groups	10	7.7%
Freight organisations	4	3.1%
Health organisations/charities	4	3.1%
Motoring groups	7	5.4%
Taxi and Private Hire organisations	6	4.6%
Transport campaign groups	11	8.5%
Other	9	6.9%
<b>Total</b>	<b>130</b>	<b>100.0%</b>

**8.2 Quantitative analysis**

- 8.2.1 Stakeholders submitted their comments via a variety of channels. Of the 130 stakeholders that responded to the consultation, 36 used the consultation portal, and 92 responded by email. Two stakeholders responded by email and through the consultation portal.
- 8.2.2 More than half of the stakeholders submitted their feedback by email rather than via the online questionnaire and therefore we do not have a complete data set for all the closed questions contained within the questionnaire. This makes, a complete quantitative analysis difficult. For this reason, we have included the majority of the stakeholder feedback reporting within Chapter 10 of this report which evaluates the written feedback (qualitative analysis). This is organised by theme so it can be better understood in relation to the proposals and the closed questions.
- 8.2.3 However, it is useful to present a quantified analysis of the degree of support and opposition to the proposals. After reviewing both the qualitative and quantitative data we have identified which stakeholders either support or oppose the overall ES proposals as well as the ideas put forward for the ULEZ (see Tables 39 to 42). As the tables show, support and opposition was nuanced, and the categories used reflect this.

**Table 38: Stakeholder support and opposition to the ES**

Response	Stakeholders
<p><b>Supported the overall principle of ES (37)</b></p>	<p>Merton Conservatives Council Group, The Clapham Society, The London Forum of Amenity and Civic Societies, Cross River Partnership, Ealing Community Transport Charity, London Sustainability Exchange, Environmental Protection UK, Royal Borough of Greenwich, Leonie Cooper AM, Seb Dance MEP, London Borough of Lewisham, Freight Transport Association, London Borough of Croydon, London Borough of Havering, London Borough of Hounslow, London Borough of Redbridge, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Wandsworth, Westminster City Council, Kingston and Sutton Shared Environment Service, London Assembly Environment Committee, London Assembly Labour Group, Association of Directors of Public Health for London and the London Environment Directors’ Network (joint response), Private Hire Board, London Cycling Campaign, National Association of Road Transport Museums, ClientEarth, Uber, UPS, DHL, The Crown Estate, Confederation of Passenger Transport UK, West End Community Network, Licensed Private Hire Car Association, CEMEX, Greenpeace, Society of Motor Manufacturers and Traders (SMMT), Global Action Plan, Brixton BID, UK Health Forum, HCT Group, Campaign for Better Transport (London), Licensed Taxi Drivers’ Association, <a href="#">The Air We Breathe</a>, Friends of Capital Transport Campaign, Living Streets, Friends of the Earth, Better</p>

	Bankside, New West End Company, Camden Town Unlimited, UK Health Alliance on Climate Change, London Tourist Coach Operators Association, Road Haulage Association, Imperial College London, Team London Bridge, European Rescue & Recovery Initiative, London First, London City Airport, Land Securities, Direct Line, John Lewis Partnership, Waitrose, Autogas, Calor Gas, The Original London Sightseeing Tour, Brewery Logistics Group
<b>Supports the ES but believes the scheme should go further (20)</b>	BYD UK, London Councils, Caroline Russell AM, British Lung Foundation, London Borough of Haringey, London Borough of Waltham Forest, Royal Borough of Kensington and Chelsea, London Borough of Hammersmith & Fulham, London Borough of Islington, London Borough of Lambeth, London Borough of Brent, London Borough of Camden, London Borough of Ealing, London Borough of Enfield, London Borough of Hackney, City of London Corporation, Sustrans, Stephen Knight (Former AM), Institute of Air Quality Management, Baroness Jenny Jones
<b>Opposes the ES (8)</b>	Alliance of British Drivers, RAC, Musicians' Union, Federation of Small Businesses, Motorcycle Action Group, GMB, Association of Vehicle Recovery Operators, Ford Motor Company
<b>Neutral or no comment (35)</b>	Ealing Transition Initiative, FirstGroup, Motorcycle Industry Association, UCL, National Express, National Association of Wedding Car Professionals, Jim Fitzpatrick MP, Justine Greening MP, Rt Hon Joan Ryan MP, London Borough of Barking and Dagenham, London Borough of Richmond upon Thames, Hertfordshire County Council, Community Transport Association, London Bus Museum, Doosan Babcock, UKLPG, The London Taxi Company, Unite the union, Climate Change Centre Reading, Age UK London, DAF Trucks, Heathrow Airport Ltd, Royal Mail Group, London Fire Brigade, CBI, London TravelWatch, Urban Partners, Environmental Industries Commission, British Motorcyclists Federation, Federation of British Historic Vehicle Clubs, National Franchised Dealers Association, BVRLA and London Assembly Conservative Group.

**Table 39: Stakeholder support and opposition to bringing the ULEZ forward in central London to 2019**

<b>Response</b>	<b>Stakeholders</b>
<p><b>Supported bringing forward the ULEZ to 2019 (75)</b></p>	<p>Merton Conservatives Council Group, The Clapham Society, The London Forum of Amenity and Civic Societies, Cross River Partnership, BYD UK, London Councils, Caroline Russell AM, Ealing Community Transport Charity, British Lung Foundation, London Borough of Haringey, Motorcycle Industry Association, London Sustainability Exchange, UCL, Environmental Protection UK, London Borough of Waltham Forest, National Express, Royal Borough of Greenwich, Royal Borough of Kensington and Chelsea, Seb Dance MEP, London Borough of Lewisham, London Borough of Islington, London Borough of Lambeth, London Borough of Brent, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Hackney, London Borough of Havering, London Borough of Hounslow, London Borough of Redbridge, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Wandsworth, Westminster City Council, City of London Corporation, Hertfordshire County Council, Kingston and Sutton Shared Environment Service, London Assembly Environment Committee, London Assembly Labour Group, Sustrans, Stephen Knight (Former AM), The London Taxi Company, Institute of Air Quality Management, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Cycling Campaign, National Association of Road Transport Museums, ClientEarth, Uber, The Crown Estate, West End Community Network, Heathrow Airport Ltd, Urban Partners, Greenpeace, Global Action Plan, Brixton BID, UK Health Forum, Campaign for Better Transport (London), Licensed Taxi Drivers' Association, The Air We Breathe Friends of Capital Transport Campaign, Living Streets, Friends of the Earth, Better Bankside, New West End Company, Camden Town Unlimited, UK Health Alliance on Climate Change, Imperial College London, Team London Bridge, London First, London City Airport, Land Securities, Autogas, Calor Gas, Baroness Jenny Jones</p>
<p><b>Opposed bringing forward the ULEZ to 2019 (26)</b></p>	<p>Alliance of British Drivers, RAC, Musicians' Union, Justine Greening MP, Freight Transport Association, London Bus Museum, Federation of Small Businesses, Motorcycle Action Group, Private Hire Board, UPS, Confederation of Passenger Transport UK, CEMEX, London Fire Brigade, GMB, Environmental Industries Commission, HCT Group, Association of Vehicle Recovery Operators, Road Haulage Association, European Rescue &amp; Recovery Initiative, John Lewis Partnership, Waitrose, Ford Motor Company, The Original London Sightseeing Tour, Brewery</p>

	Logistics Group, National Franchised Dealers Association, BVRLA
<b>Neutral or no comment (29)</b>	Ealing Transition Initiative, FirstGroup, National Association of Wedding Car Professionals, Jim Fitzpatrick MP, London Borough of Barking and Dagenham, London Borough of Hammersmith & Fulham, London Borough of Richmond upon Thames, Community Transport Association, Doosan Babcock, UKLPG, Volvo, No Comment, DHL, Climate Change Centre Reading, Age UK London, DAF Trucks, Licensed Private Hire Car Association, Royal Mail Group, CBI, London TravelWatch, SMMT, British Motorcyclists Federation, Federation of British Historic Vehicle Clubs, London Tourist Coach Operators Association, Land Securities and London Assembly Conservative Group.

**Table 40: Stakeholder support and opposition to widening the ULEZ Londonwide for Heavy Vehicles**

<b>Response</b>	<b>Stakeholders</b>
<b>Supported expanding the ULEZ Londonwide for HGVs (86)</b>	Merton Conservatives Council Group, The Clapham Society, London Forum of Amenity and Civic Societies, Cross River Partnership, BYD UK, London Councils, Caroline Russell AM, British Lung Foundation, London Sustainability Exchange, UCL, Environmental Protection UK, London Borough of Waltham Forest, Royal Borough of Greenwich, Royal Borough of Kensington and Chelsea, Justine Greening MP, Rt Hon Joan Ryan MP, Leonie Cooper AM, Seb Dance MEP, London Borough of Lewisham, London Borough of Barking and Dagenham, London Borough of Hammersmith & Fulham, London Borough of Islington, London Borough of Brent, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Hackney, London Borough of Havering, London Borough of Hounslow, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Wandsworth, Westminster City Council, City of London Corporation, Hertfordshire County Council, Kingston and Sutton Shared Environment Service, London Assembly Environment Committee, London Assembly Labour Group, Sustrans, Stephen Knight (Former AM), The London Taxi Company, Institute of Air Quality Management, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), Private Hire Board, London Cycling Campaign, ClientEarth, Unite the Union, UPS, DHL, The Crown Estate, Licensed Private Hire Car Association, London Fire Brigade, GMB, Urban Partners, Greenpeace, Environmental Industries Commission, Global Action Plan, Brixton BID, UK Health Forum,

	HCT Group, Campaign for Better Transport (London), Licensed Taxi Drivers' Association, The Air We Breathe, Friends of Capital Transport Campaign, British Motorcyclists Federation, Living Streets, Friends of the Earth, Better Bankside, New West End Company, Camden Town Unlimited, UK Health Alliance on Climate Change, London Tourist Coach Operators Association, Imperial College London, Team London Bridge, European Rescue & Recovery Initiative, London First, John Lewis Partnership, Waitrose, Autogas, Calor Gas, The Original London Sightseeing Tour, Brewery Logistics Group, Baroness Jenny Jones
<b>Opposed expanding the ULEZ Londonwide for HGVs (13)</b>	Alliance of British Drivers, FirstGroup, National Express, Freight Transport Association, Federation of Small Businesses, Motorcycle Action Group, National Association of Road Transport Museums, Confederation of Passenger Transport UK, CBI, Association of Vehicle Recovery Operators, Road Haulage Association, Ford Motor Company, National Franchised Dealers Association
<b>Neutral or no comment (29)</b>	RAC, Ealing Transition Initiative, Ealing Community Transport Charity, Musicians Union', London Borough of Haringey, Motorcycle Industry Association, National Association of Wedding Car Professionals, Jim Fitzpatrick MP, London Borough of Lambeth, London Borough of Redbridge, London Borough of Richmond upon Thames, Community Transport Association, London Bus Museum, Doosan Babcock, UKLPG, Uber, Clean Air in London, Volvo, Climate Change Centre Reading, West End Community Network, Age UK London, DAF Trucks, Heathrow Airport Ltd, CEMEX, Royal Mail Group, London TravelWatch, SMMT, Federation of British Historic Vehicle Clubs, London City Airport, Direct Line, BVRLA and London Assembly Conservative Group.

**Table 41: Stakeholder support and opposition to widening the ULEZ to the North and South Circular Roads for all vehicles**

<b>Response</b>	<b>Stakeholders</b>
<b>Supported expanding the ULEZ to the North and South Circular Roads for all vehicles (58)</b>	Merton Conservatives Council Group, Cross River Partnership, BYD UK, UCL, Environmental Protection UK, Royal Borough of Kensington and Chelsea, Seb Dance MEP, London Borough of Croydon, London Borough of Tower Hamlets, Westminster City Council, Kingston and Sutton Shared Environment Service, London Bus Museum, Sustrans, Stephen Knight (Former AM), The London Taxi Company, Institute of Air Quality Management, Private Hire Board, London Cycling Campaign, National Association of Road Transport Museums, Uber, UPS, DHL, The Crown Estate, West End Community Network, Heathrow Airport Ltd, London Fire Brigade, GMB, Urban Partners, Greenpeace, Environmental Industries Commission, Global Action Plan, Brixton BID, UK Health

	<p>Forum, HCT Group, Campaign for Better Transport (London), Licensed Taxi Drivers' Association, The Air We Breathe, Friends of Capital Transport Campaign, Living Streets, Friends of the Earth, Better Bankside, New West End Company, Camden Town Unlimited, UK Health Alliance on Climate Change, London Tourist Coach Operators Association, Imperial College London, Team London Bridge, European Rescue &amp; Recovery Initiative, London First, Land Securities, Direct Line, John Lewis Partnership, Waitrose, Calor Gas, The Original London Sightseeing Tour, Brewery Logistics Group, National Franchised Dealers Association</p>
<p><b>Supported the expansion but believes the scheme should go further (28)</b></p>	<p>The Clapham Society, The London Forum of Amenity and Civic Societies, London Councils, Caroline Russell AM, British Lung Foundation, London Borough of Haringey, London Sustainability Exchange, London Borough of Waltham Forest, Royal Borough of Greenwich, Rt Hon Joan Ryan MP, Leonie Cooper AM, London Borough of Lewisham, London Borough of Barking and Dagenham, London Borough of Hammersmith &amp; Fulham, London Borough of Islington, London Borough of Brent, London Borough of Camden, London Borough of Ealing, London Borough of Enfield, London Borough of Hackney, London Borough of Hounslow, London Borough of Southwark, Hertfordshire County Council, London Assembly Labour Group, London Assembly Environment Committee, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), ClientEarth, Unite the union, Baroness Jenny Jones</p>
<p><b>Opposed expanding the ULEZ to the North and South Circular Roads for all vehicles (11)</b></p>	<p>Alliance of British Drivers, RAC, Ealing Community Transport Charity, FirstGroup, Motorcycle Industry Association, Federation of Small Businesses, Motorcycle Action Group, Confederation of Passenger Transport UK, Association of Vehicle Recovery Operators, Road Haulage Association and London Assembly Conservative Group.</p>
<p><b>Neutral or no comment (34)</b></p>	<p>Ealing Transition Initiative, Musicians Union', National Express, National Association of Wedding Car Professionals, Jim Fitzpatrick MP, Justine Greening MP, Freight Transport Association, London Borough of Lambeth, London Borough of Havering, London Borough of Redbridge, London Borough of Richmond upon Thames, London Borough of Wandsworth, City of London Corporation, Community Transport Association, Doosan Babcock, UKLPG, Clean Air in London, Volvo, Climate Change Centre Reading, Age UK London, DAF Trucks, Licensed Private Hire Car Association, CEMEX, Royal Mail Group, CBI, London TravelWatch, SMMT, British Motorcyclists Federation, Federation of British Historic Vehicle Clubs, London City Airport, Ford Motor Company, BVRLA</p>

## 9. Emissions Surcharge issues raised

### 9.1 Introduction

- 9.1.1 This chapter sets out our analysis of the responses received to the ES aspect of the consultation by theme, and our reaction to the comments, issues and recommendations contained in those responses. Comments from stakeholders and free text responses from the public and business respondents have been attributed to the most pertinent aspect of the proposal. Within each theme, the 'issues raised' during the consultation that go to make up that theme have been identified and are listed at the start of each section, followed by our response and any recommendation. Where issues are similar, these have been grouped together for a single TfL response.
- 9.1.2 The chapter brings together comments from stakeholders, the public and businesses, including data from the questionnaire (as set out in full in Chapter 5).
- 9.1.3 The themes addressed are as follows:
- ***Theme A: Principle of the Emissions Surcharge***
  - ***Theme B: Vehicle emissions standards***
  - ***Theme C: Charge level***
  - ***Theme D: Timetable***
  - ***Theme E: Charging hours***
  - ***Theme F: Discounts and exemptions***
  - ***Theme G: Impacts***

### 9.2 Theme A: Principle of the Emissions Surcharge

- 9.2.1 The following 89 stakeholders commented on this theme: Alliance of British Drivers, Association of Vehicle Recovery Operators, Autogas, Baroness Jenny Jones, Better Bankside, Brewery Logistics Group, British Lung Foundation, British Motorcyclists Federation, Brixton BID, BYD UK, Calor Gas, Camden Town Unlimited, Campaign for Better Transport (London), CEMEX, City of London Corporation, Clean Air in London, ClientEarth, Confederation of Passenger Transport UK, Cross River Partnership, DAF Trucks, Direct Line, Ealing Community Transport Charity, Environmental Protection UK, European Rescue & Recovery Initiative, Federation of British Historic Vehicle Clubs, Federation of Small Businesses, Ford Motor Company, Freight Transport Association, Friends of Capital Transport Campaign, Friends of the Earth, Global Action Plan, GMB, Greenpeace, HCT Group, Imperial College London, Institute of Air Quality Management, John Lewis Partnership, Kingston and Sutton Shared Environment Service, Land Securities, Leonie Cooper AM, Licensed Private Hire Car Association, Licensed Taxi Drivers' Association, Living Streets, London Assembly Environment Committee, London Assembly Green Party Group, Association

of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Barking and Dagenham, London Borough of Brent, 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 Havering, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Redbridge, London Borough of Southwark, London Bus Museum, London Councils, London Cycling Campaign, London First, London Sustainability Exchange, The London Taxi Company, London Tourist Coach Operators Association, Merton Conservatives Council Group, Motorcycle Action Group, National Association of Road Transport Museums, New West End Company, Private Hire Board, Road Haulage Association, Royal Borough of Greenwich, Royal Borough of Kensington and Chelsea, Stephen Knight (Former AM), Team London Bridge, The Clapham Society, The Crown Estate, The Original London Sightseeing Tour, UK Health Alliance on Climate Change, Uber, UK Health Forum, UKLPG, Unite the Union, Waitrose, West End Community Network, and Westminster City Council.

***Issues raised in relation to this theme***

- ***Support and opposition to the principle of the ES***
- ***Supports the ES, but believes it should go further***
- ***Awareness raising of the ES***

***Support and opposition to the principle of the ES***

- 9.2.2 Overall support and opposition to the ES proposals by stakeholders is set out in Chapter 8 and by the public and business in Chapter 6.

***TfL response***

- 9.2.3 We welcome the support for the ES proposal. As several stakeholders have acknowledged, it is an important stepping stone to the ULEZ. Although there is a majority in support of the ES, there was some opposition. This opposition is drawn out through the analysis of the specific comments addressed in this chapter.

***Supports the ES, but believes it should go further***

- 9.2.4 A list of stakeholders who stated that the ES should go further is set out in Chapter 8.
- 9.2.5 Of the public and business responses, 348 comments were made supporting measures stronger than those proposed in the consultation, which constitutes two per cent of all respondents.

### ***TfL response***

- 9.2.6 The ES strikes a balance between the need to take action as soon as possible to improve air quality and the impacts on individuals and business, as well as our ability to deliver the scheme.
- 9.2.7 Specific suggestions for changes to the scheme (eg changes to standards or hours of operation) are considered under the relevant headings in the rest of this chapter).

### ***Awareness raising***

- 9.2.8 The Freight Transport Association (FTA) supports the ES but stated a campaign to make operators aware of the new ES standards was essential.

### ***TfL response***

- 9.2.9 Should the Mayor decide to proceed with the ES, there would be a wide scale publicity campaign to ensure that those affected are aware of the changes.

## **9.3 Theme B: Vehicle emissions standards**

- 9.3.1 The following 11 stakeholders commented on this theme: Institute of Air Quality Management, London Assembly Environment Committee, London Borough of Camden, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Haringey, London Councils, RAC, Royal Borough of Kensington and Chelsea, Stephen Knight (Former AM), and Westminster City Council.
- 9.3.2 Of the public and business responses, 468 comments were made on emissions standards. Of these, there were 297 comments suggesting that the ES should be determined on emissions rather than age.

### ***Issues raised in relation to this theme***

- ***Comments on petrol standards compared with diesel***

### ***Comments on petrol standards compared with diesel***

- 9.3.3 All 11 stakeholders listed above stated that the ES should have different emissions standards for petrol and diesel vehicles.
- 9.3.4 The London Borough of Camden, London Borough of Hackney, London Borough of Hammersmith & Fulham and London Councils stated that there should be a Euro 5/V standard for diesel vehicles, with the London Borough of Hammersmith & Fulham stating that this should apply to petrol vehicles as well.

9.3.5 The London Borough of Islington and Stephen Knight suggested a Euro 6/VI standard for diesel and ClientEarth stated that all diesel vehicles should be included within the charge.

9.3.6 The RAC suggested a Euro 3 standard for petrol and Westminster City Council suggested all petrol vehicles should be exempt.

### ***TfL response***

9.3.7 The Euro 6/VI standard was introduced in 2014 for heavy vehicles, 2015 for passenger cars and 2016 for light goods vehicles. It would be too soon to expect high levels of compliance when the ES is introduced if the emissions standards of the scheme included a requirement for Euro 6/VI.

9.3.8 A Euro 5/V standard for diesel vehicles would present similar issues to setting a Euro 6/VI standard and would create the additional complexity of introducing a third emissions standard that does not align to the ULEZ standards. Additionally, there is evidence that across some vehicle types the Euro 5/V standard emits more NO<sub>x</sub> than the Euro 4/IV standard, although PM levels are lower.

9.3.9 The fact that diesel vehicles on a like-for-like basis tend to be more polluting than petrol equivalents is acknowledged within the ULEZ standards, which set a more stringent Euro 6/VI standard for diesel vehicles and a Euro 4 standard for petrol. We will ensure that, when advising customers of action to take to upgrade their vehicle, they are made aware of the forthcoming ULEZ, to avoid a situation where non-compliant vehicles are upgraded to a diesel Euro 4/IV standard when the owner intends to keep that vehicle past the ULEZ start date. In that situation, the owner might be better off upgrading to a Euro 6/VI diesel vehicle.

9.3.10 Progressive emissions standards have proved effective in reducing emissions from petrol vehicles under real world driving conditions. However, whilst petrol vehicles emit less NO<sub>x</sub> than their diesel equivalents, they are still a contributor to air pollution. Amongst pre-Euro 4 vehicles in central London, petrol cars are responsible for 14 per cent of NO<sub>x</sub> emissions, whilst diesel cars are responsible for 19 per cent. This is because, although pre-Euro 4 petrol cars emit much less NO<sub>x</sub> than pre-Euro 4 diesel cars, there are more of them.

9.3.11 The ULEZ will set a minimum Euro 4 standard for petrol vehicles and the ES has been designed to align with this standard as far as possible.

## **9.4 Theme C: Charge level**

9.4.1 Two stakeholders commented on this theme: London Borough of Islington and Stephen Knight (Former AM).

9.4.2 Of the public and business responses, 125 comments were received suggesting a higher charge for diesel vehicles.

### ***Issues raised in relation to this theme***

- ***The charge should be higher for all vehicle types***
- ***The charge should be lower***
- ***The charge should be increased over time***

### ***The charge should be higher for all vehicle types***

- 9.4.3 The London Borough of Islington stated that the charge should be £12.50 for light duty vehicles and £100 for heavy vehicles.

### ***TfL response***

- 9.4.4 The ES is designed as a supplement to the Congestion Charge, and as such, a uniform charge level has been set for simplicity of operation. The charge level is designed to deter regular trips made by the most polluting vehicles, but enable occasional trips to be made.
- 9.4.5 Setting the charge levels as those for the ULEZ is likely to increase the potential for confusion with the ULEZ.

### ***The charge should be lower***

- 9.4.6 Stephen Knight (Former AM) suggested that an ES which applied the same standards as the ULEZ should be introduced at an initial £2– £3 level.

### ***TfL response***

- 9.4.7 As stated in the Consultation and information document, a lower level charge, with a stricter emissions standard, was considered as an option for the ES.
- 9.4.8 A higher charge would encourage more drivers to adopt cleaner vehicles and would therefore be more beneficial in terms of air quality. A lower level charge would result in vehicle owners paying the charge, rather than upgrading to a less polluting vehicle. The priority for the Mayor and TfL was to remove the oldest, most polluting vehicles from central London, therefore a charge of £10 was chosen, rather than a lower charge of £2 to £3, for example.

### ***The charge should be increased over time***

- 9.4.9 Stephen Knight (Former AM) suggested that the ES should increase over time, from his proposed lower amount, and initial charge, culminating in the £12.50 ULEZ charge.
- 9.4.10 The London Borough of Islington suggested that the charge level should rise one per cent per year in line with inflation.

### ***TfL response***

- 9.4.11 The GLA Act requires the road user charge Scheme Order to specify the level of charges for road use. The legislation does not permit the Scheme Order to make provision for the automatic increase in the level of the ES or the Congestion Charge in line with inflation or any other formula. Any change to the charge level requires a Variation Order and full statutory consultation. Given the relatively short timeframe in which the ES will operate, we do not believe it would be cost effective to undertake a further consultation to increase the charge level.

### **9.5 Theme D: Timetable**

- 9.5.1 The following 36 stakeholders commented on this theme: British Lung Foundation, British Motorcyclists Federation, Brixton BID, ClientEarth, Confederation of Passenger Transport UK, Ealing Community Transport Charity, Environmental Industries Commission, European Rescue & Recovery Initiative, Federation of Small Businesses, FirstGroup, Friends of the Earth, Global Action Plan, Greenpeace, Justine Greening MP, Leonie Cooper AM, Licensed Private Hire Car Association, London Assembly Environment Committee, London Assembly Green Party Group, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Barking and Dagenham, London Borough of Islington, London Borough of Lambeth, London Borough of Redbridge, London Borough of Waltham Forest, London Borough of Wandsworth, London Councils, London Cycling Campaign, London Sustainability Exchange, National Express, Private Hire Board, RAC, SMMT, Sustrans, The Clapham Society, University College London and Urban Partners.
- 9.5.2 The public and business responses in relation to this theme are set out in Chapter 6 of this report.

#### ***Issues raised in relation to this theme***

- ***Implement the ES as soon as possible***
- ***Implement the ES later***

#### ***Implement the ES as soon as possible***

- 9.5.3 The following 22 stakeholders stated their support for implementing the ES as soon as possible: British Lung Foundation, ClientEarth, Friends of the Earth, Global Action Plan, Greenpeace, Leonie Cooper AM, London Assembly Environment Committee, London Assembly Green Party Group, Association of Directors of Public Health for London Environment Directors' Network (joint response), London Borough of Barking and Dagenham, London Borough of Islington, London Borough of Lambeth, London Borough of Redbridge, London Borough of Waltham Forest, London Borough of Wandsworth, London Councils, London Cycling Campaign,

London Sustainability Exchange, Sustrans, The Clapham Society, University College London and Urban Partners.

- 9.5.4 Additionally, 1,056 comments from public and business respondents were received, stating that the proposals should be implemented as soon as possible.

***TfL response***

- 9.5.5 We welcome the support to implement the ES as soon as possible.
- 9.5.6 Implementing the ES requires alterations to the payment and enforcement systems for the Congestion Charge. In addition, we are developing a compliance checker for us and vehicle owners to identify which vehicles will be liable for the charge. It is not possible to do this before October 2017.

***Implement the ES later***

- 9.5.7 The following 11 stakeholders stated that more time was needed to comply with the ES standards: British Motorcyclists Federation, Brixton BID, Confederation of Passenger Transport UK, European Rescue & Recovery Initiative, Federation of Small Businesses, Justine Greening MP, Licensed Private Hire Car Association, National Express, Private Hire Board, RAC and SMMT.

***TfL response***

- 9.5.8 The surcharge is designed to affect the oldest most polluting vehicles. Euro 4/IV vehicles have been available for purchase since at least 2005. There are a wide range of compliant vehicles available. There is also the opportunity for drivers of affected vehicles to change their mode of travel, retime their journeys outside Congestion Charge hours or pay a daily charge.
- 9.5.9 Should the Mayor decide to proceed, we will undertake an extensive publicity campaign to inform affected customers about the ES.
- 9.5.10 In view of the availability of alternative options and the relatively small number of affected vehicles, our view is that the eight months between the Mayor's decision and the start of the scheme would provide sufficient notice for most vehicle types.

**9.6 Theme E: Charging hours**

- 9.6.1 The following 10 stakeholders stated that the ES should apply 24 hours a day, seven days a week: John Lewis Partnership, London Borough of Brent, London Borough of Camden, London Borough of Enfield, London Borough of Hackney, London Borough of Haringey, London Borough of Islington, London Borough of Lambeth, London Councils, and Waitrose.

### ***Issues raised in relation to this theme***

- ***The ES should operate 24 hours a day, seven days a week***

### ***The ES should operate 24 hours a day, seven days a week***

- 9.6.2 All stakeholders above stated that the ES should operate 24 hours a day, seven days a week.

### ***TfL response***

- 9.6.3 The ES is designed as a supplement to the Congestion Charge and to send a strong signal that the most polluting vehicles need to upgrade or pay more to drive in the zone during charging hours. Aligning the ES hours of operation with the Congestion Charge hours of operation enables the scheme to make use of the existing Congestion Charging infrastructure and operations, thus facilitating its quick introduction. It would take much longer to implement the scheme if it were to operate 24 hours a day, seven days a week. The scheme is intended to act as a stepping stone ahead of the full introduction of the ULEZ, when tighter vehicles emissions standards will come into force. For this reason, and the need to take urgent action on air quality, early implementation of the ES is desirable.

## **9.7 Theme F: Discounts and exemptions**

- 9.7.1 The following 66 stakeholders made comments on this theme: Association of Vehicle Recovery Operators, Better Bankside, Brewery Logistics Group, British Lung Foundation, British Motorcyclists Federation, Brixton BID, Calor Gas, Camden Town Unlimited, Campaign for Better Transport (London), City of London Corporation, Direct Line, Ealing Community Transport Charity, Federation of British Historic Vehicle Clubs, FirstGroup, Ford Motor Company, Friends of Capital Transport Campaign, Friends of the Earth, Global Action Plan, GMB, HCT Group, Imperial College London, John Lewis Partnership, Kingston and Sutton Shared Environment Service, Land Securities, Licensed Private Hire Car Association, Licensed Taxi Drivers' Association, Living Streets, London Borough of Ealing, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Haringey, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Southwark, London Borough of Waltham Forest, London Bus Museum, London City Airport, London Councils, London Sustainability Exchange, , London Tourist Coach Operators Association, London TravelWatch, Merton Conservatives Council Group, Musicians' Union, National Association of Road Transport Museums, National Association of Wedding Car Professionals, National Franchised Dealers Association, New West End Company, Private Hire Board, RAC, Road Haulage Association, Royal Borough of Greenwich, Seb Dance MEP, Stephen Knight (Former AM), Team London Bridge, The Air We Breathe, The Crown Estate, The London Taxi Company, The Original London Sightseeing Tour, UK Health Alliance on Climate Change, Uber, UK

Health Forum, Volvo, Waitrose, West End Community Network and Westminster City Council.

- 9.7.2 Of the public and business respondents, 2,107 commented on discounts and exemptions, although this will have included comments on the ULEZ.

***Issues raised in relation to this theme***

- ***Support and opposition to the proposed residents' discount***
- ***Support and opposition to the proposed taxi and PHV exemptions***
- ***Support and opposition to the proposed historic vehicles exemption***
- ***Support and opposition to the proposed Showman's vehicles exemption***
- ***Support and opposition to the inclusion of 9+ seater vehicles***
- ***Other discount and exemption issues***

***Support and opposition to the proposed residents' discount***

- 9.7.3 The following 14 stakeholders commented on the proposed residents' discount: Brewery Logistics Group, City of London Corporation, John Lewis Partnership, London Borough of Hackney, London Borough of Haringey, London Borough of Hounslow, London Borough of Islington, London Borough of Waltham Forest, London City Airport, London Councils, London Sustainability Exchange, Seb Dance MEP, UK Health Forum and Waitrose.
- 9.7.4 Amongst the public and business respondents, 117 stated they opposed the residents' discount; this equates to around one per cent of the total responses from the public.
- 9.7.5 London City Airport and Westminster City Council supported the 90 per cent residents' discount.
- 9.7.6 The following five stakeholders said that residents should not receive a discount on the ES: Brewery Logistics Group, John Lewis Partnership, London Borough of Islington, London Borough of Haringey and Waitrose.
- 9.7.7 The following five stakeholders suggested that the residents' discount should be reduced over time to encourage compliance: City of London Corporation, London Borough of Hackney, London Borough of Hounslow, London Borough of Islington and London Borough of Waltham Forest.
- 9.7.8 London Sustainability Exchange stated that the residents' discount should be lower.

***TfL response***

- 9.7.9 In recognition of the relatively short timescales available to upgrade vehicles, and the fact that residents that drive do not have the option to

avoid the charge by avoiding the zone, we are proposing that they will receive a discount on the charge. This was set at 90 per cent to align with the existing Congestion Charge discount.

- 9.7.10 The GLA Act requires the road user charging Scheme Order to specify the level of charges. Within the Scheme Order, the charge level for residents is fixed at £1. The legislation does not permit the Scheme Order to make provision for the automatic increase in the level of the ES for residents. Any change to the charge level requires a variation order and full statutory consultation. We do not believe it would be cost effective to undertake a further consultation to increase the charge level.

### ***Support and opposition to the proposed taxi and PHV exemptions***

- 9.7.11 The following 16 stakeholders commented on the taxi and PHV exemptions for the ES: City of London Corporation, Friends of the Earth, Living Streets, London Borough of Ealing, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Islington, London Borough of Waltham Forest, London Councils, Licensed Private Hire Car Association (LPHCA), London Taxi Drivers' Association, The London Taxi Company, London TravelWatch, Private Hire Board, Seb Dance MEP, Stephen Knight (Former AM) and Westminster City Council.
- 9.7.12 The following 13 stakeholders stated that PHVs should be subject to the ES: City of London Corporation, Friends of the Earth, Living Streets, London Borough of Hackney, London Borough of Ealing, London Borough of Hammersmith & Fulham, London Borough of Islington, London Borough of Waltham Forest, London Councils, The London Taxi Company, London Taxi Drivers' Association, Stephen Knight (Former AM) and Westminster City Council.
- 9.7.13 The LPHCA and the Private Hire board supported the exemption for PHVs.
- 9.7.14 The following seven stakeholders stated that taxis should be subject to the ES: City of London Corporation, London Borough of Camden, London Borough of Hammersmith & Fulham, London Borough of Islington, London Borough of Waltham Forest, Seb Dance MEP and Westminster City Council.
- 9.7.15 The London Borough of Islington argued that, as some authorities outside of London do not set age limits, all taxis and PHVs should be subject to the ES, with reimbursement for taxi drivers if necessary.
- 9.7.16 Of the public and business responses, 153 respondents specified an opposition to taxi and PHV exemptions, which constitutes approximately one per cent of responses.

### ***TfL response***

- 9.7.17 The ES is designed to closely mirror the exemptions and discounts for the Congestion Charge to ensure the scheme can be implemented quickly and

is easy to communicate. London licensed Taxis and PHVs are currently exempt from the Congestion Charge.

- 9.7.18 TfL's PHV licensing requirements impose a 10-year age limit on the majority of vehicles. There are limited five-year extensions for wheelchair accessible vehicles and other specialist PHV types, decided on a case by case basis. As a result of these age limits, nearly all PHVs are compliant with the ES standard.
- 9.7.19 Data from January 2017 indicated that only 115 PHVs licensed in all of Greater London do not meet the ES standard. We do not hold information on how often these specific vehicles enter the Congestion Charge zone during charging hours. As all new licensed PHVs need to meet standards stricter than the ES standard, this number is likely to reduce further by the implementation date. There would be an administrative cost in including these vehicles within the scheme but a negligible benefit.
- 9.7.20 As set out on page 30 of the Consultation and information document, there are additional licensing requirements to reduce emissions from PHVs that will have much greater benefits compared to including them in the ES.
- 9.7.21 The taxi and PHV exemptions to the Congestion Charge only apply to vehicles licensed by TfL and the exemption for PHVs only applies to private hire bookings. Vehicles from neighbouring authorities not licensed by TfL do not qualify for the Congestion Charge exemption. Drivers of vehicles not licensed by TfL would therefore be liable for the ES on top of the Congestion Charge if they drive within the Congestion Charging zone during charging hours in a vehicle that does not meet the ES standard.
- 9.7.22 We will be reviewing the Congestion Charge exemption for PHVs during 2017. Any proposals on this would be put forward for a public consultation. Removing the exemption from the ES or otherwise will be considered as part of this.
- 9.7.23 Taxis are already subject to a 15-year age limit. We require taxis to be purpose-designed for London's unique street network and to be fully accessible to wheelchair users. This means it is a specialist vehicle, which has resulted in limited choice for black cab drivers. Given the requirement for taxis to accept any fare up to 12 miles within Greater London there is no option for taxis to avoid the ES by not driving into the zone. From 2018, we will no longer license new diesel taxis and vehicles new to licensing will need to meet zero emission capable requirements instead. It is our opinion that this is the best approach to reducing emissions from the taxi fleet whilst supporting the industry.

#### ***Support and opposition to the proposed historic vehicles exemption***

- 9.7.24 The following 20 stakeholders stated their support for the historic vehicles exemption: Association of Vehicle Recovery Operators, British Motorcyclists Federation, Calor Gas, City of London Corporation, European Rescue & Recovery Initiative, Federation of British Historic Vehicle Clubs, Friends of

Capital Transport Campaign, Licensed Private Hire Car Association, London Borough of Lambeth, London Bus Museum, London Tourist Coach Operators Association, Merton Conservatives Council Group, National Association of Road Transport Museums, National Franchised Dealers Association, Private Hire Board, RAC, Seb Dance MEP, The Original London Sightseeing Tour, Volvo and West End Community Network.

- 9.7.25 The National Association of Road Transport Museums provided additional information on the numbers of historic vehicles in London.
- 9.7.26 The following 13 stakeholders stated their opposition to the historic vehicles exemption: Brixton BID, Global Action Plan, Imperial College London, Living Streets, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Islington, London Borough of Southwark, London Borough of Waltham Forest, London Councils, New West End Company, UK Health Alliance on Climate Change and The Air We Breathe. Some stakeholders suggested that exemptions should be made on a case by case basis for special events.
- 9.7.27 The public and business views on the historic vehicles exemption to the surcharge are set out in section 6.5.

#### ***TfL response***

- 9.7.28 The ULEZ currently exempts historic tax class vehicles on the basis that there are limited numbers and it is not practical or possible to upgrade or retrofit them without alterations that would result in a significant loss of historic character (eg replacing the engine with a modern one).
- 9.7.29 The ES is designed as a precursor to the ULEZ. Therefore, the intention is that vehicles that are subject to the ES, would then be subject to the ULEZ when it comes into operation, but with stricter emissions standards.
- 9.7.30 Data indicates that, on average, approximately 33 vehicles per day that would potentially qualify for a historic vehicle exemption enter the Congestion Charging zone during charging hours. The benefit of including these vehicles in the scope of the charge would be negligible.
- 9.7.31 An option where historic vehicles are not generally exempt from the ES, but can apply for an exemption for special events, was considered, but it is not considered cost effective due to the increased costs and administrative burden to both TfL and the event organisers, and the emissions benefit would be limited.

#### ***Support and opposition to the proposed Showman's vehicles exemption***

- 9.7.32 The following 13 stakeholders stated their opposition to the Showman's vehicles exemption: Brixton BID, Calor Gas, Camden Town Unlimited, GMB, Imperial College London, Licensed Private Hire Car Association, Living Streets, London Borough of Ealing, London Borough of

Hammersmith & Fulham, London Borough of Islington, London Councils, UK Health Alliance on Climate Change and The Air We Breathe. Some of these stakeholders suggested that exemptions for Showman's vehicles should be made on a case by case basis for special events.

- 9.7.33 The public and business views on the Showman's vehicles exemption are set out in Chapter 6 of this report.

***TfL response***

- 9.7.34 The ES is designed as a precursor to the ULEZ. Therefore, the intention is that vehicles that are subject to the ES, would then be subject to the ULEZ when it comes into operation, but with stricter emissions standards.
- 9.7.35 The LEZ and the ULEZ currently exempt Showman's vehicles on the basis that there are limited numbers, and it is not practical to upgrade or retrofit these vehicles.
- 9.7.36 An option where Showman's vehicles are not generally exempt from the ES, but can apply for an exemption for special events, was considered, but it is not considered cost effective due to the increased costs and administrative burden to both TfL and the event organisers, and the emissions benefit would be limited.
- 9.7.37 There are strict criteria as to what can be designated as a Showman's vehicle, one of which is that it is used solely by that person for the purposes of his or her business and no other purpose. By definition, these vehicles are used solely for the purpose of events.
- 9.7.38 Our most recent data indicates that during October and November 2016, 131 different Showman's vehicles were observed entering the Congestion Charge zone during charging hours, approximately three vehicles per day.

***Support and opposition to the inclusion of 9+ seater vehicles***

- 9.7.39 The following 33 stakeholders commented on the inclusion of 9+ seater vehicles in the charge: Better Bankside, Brewery Logistics Group, British Lung Foundation, Calor Gas, Camden Town Unlimited, Campaign for Better Transport (London), City of London Corporation, Ford Motor Company, Global Action Plan, Imperial College London, John Lewis Partnership, Kingston and Sutton Shared Environment Service, Land Securities, Licensed Taxi Drivers' Association, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Lambeth, London Borough of Southwark, London Sustainability Exchange, London Tourist Coach Operators Association, National Franchised Dealers Association, New West End Company, Road Haulage Association, Royal Borough of Greenwich, Seb Dance MEP, Team London Bridge, The Crown Estate, The Original London Sightseeing Tour, UK Health Alliance on Climate Change, UK Health Forum, Waitrose, West End Community Network and The Air We Breathe.

- 9.7.40 Of these stakeholders, the Confederation of Passenger Transport UK, Ford Motor Company, London Borough of Southwark and the National Franchised Dealers Association were opposed to the inclusion of 9+ seater vehicles. The London Borough of Lambeth and GMB supported a discount, if vehicles are used by charity organisations or are modified to support disabled access. HCT Group opposed the inclusion of minibuses in the charge. The remaining stakeholders supported the inclusion of all 9+ seater vehicles.
- 9.7.41 The public and business responses to the 9+ seater exemption are set out in section 6.8

***TfL response***

- 9.7.42 On an individual vehicle basis, non-compliant 9+ seater vehicles are the largest polluters, and compliant vehicles have been available for purchase since 2005.
- 9.7.43 It is not considered appropriate to have exemption for charity minibuses; such an exemption does not apply in the LEZ or ULEZ and defining what qualified for such an exemption would in practice be difficult. It would also give rise to calls for other exemptions. However as outlined above, Vehicles adapted for the carriage of disabled people receive disabled tax class status and are exempt from the ES. Minibuses which do not comply with the Emissions surcharge standards (ie are older than 13 years if petrol and 4 years if diesel) would be subject to a charge of £10 per day, meaning that occasional trips are still affordable.
- 9.7.44 There are less than 500 non-compliant vehicles currently registered for the 9+ seater discount for the Congestion Charge. Of these, data from the first half of 2016 indicates that over half did not enter the Congestion Charging Zone at all during charging hours and a further 31 per cent entered the Congestion Charging Zone less than 10 times during charging hours. The number of vehicles affected by the charge is expected to be small and the level of the charge is set so that it will not cause undue burden on smaller organisations.

***Other discount and exemption issues***

- 9.7.45 The London Borough of Islington requested clarification as to the exemption for Ministry of Defence vehicles.
- 9.7.46 The London Borough of Islington and London Councils stated that non-road going vehicles (eg tractors) should be subject to the ES.
- 9.7.47 The London Borough of Islington and London Councils stated that motorcycles and mopeds should be subject to the ES. Of the public and business respondents, 479 supported an exemption for motorcycles.

- 9.7.48 London Councils and the London Borough of Islington stated that breakdown vehicles and roadside recovery vehicles should be subject to the ES.
- 9.7.49 GMB opposed a discount for private ambulances and 'other commercial vehicles', although they were not specific about what they meant by 'other commercial vehicles'.
- 9.7.50 The John Lewis Partnership and Waitrose stated that there should be no exemptions to the ES.
- 9.7.51 The Brewery Logistics Group stated that there should be an exemption for HGVs.
- 9.7.52 The Musicians' Union proposed a discount or exemption for essential workers who have no choice but to travel by car.
- 9.7.53 The Federation of Small Businesses stated that there should be a similar 'sunset period' discount or exemption for small and micro businesses as per those enjoyed by residents.
- 9.7.54 Of the public and business respondents, 116 supported an exemption for private cars.

***TfL response***

- 9.7.55 Presently, one per cent of NO<sub>x</sub> emissions in central London come from motorcycles and mopeds. We recognise that these vehicles do contribute to pollution, which is why they will be included in the ULEZ. The ES is intended to act as a stepping stone ahead of the full introduction of the ULEZ, when tighter vehicle emissions standards will come into force.
- 9.7.56 The discounts and exemptions to the ES have been chosen to align, where possible, with the Congestion Charge in order to enable implementation of the ES as soon as possible, whilst also aligning with the ULEZ where possible. The inclusion of motorcycles and mopeds would create additional complications in implementing and administering the ES, which would mean it could not be delivered by October 2017. For this reason, and the need to take urgent action on air quality, it is not proposed that motorcycles and mopeds be subject to the ES.
- 9.7.57 Similarly, accredited breakdown and recovery vehicles will be exempt from the ES as including them would create additional complications in administering and implementing the ES. There are 3,300 breakdown vehicles registered for the Congestion Charge exemption, of which we estimate around 180 would not comply with the ES standards. Data from June 2016 indicates that 147 of these vehicles did not enter the Congestion Charging zone at all during charging hours in this month. This indicates that there would be negligible benefit in charging these vehicles.
- 9.7.58 There are 650 recovery vehicles registered for the Congestion Charge discount, of which we estimate around 174 would not comply with the ES

standards. Data from June 2016 indicates that 135 of these vehicles did not enter the Congestion Charging zone at all during charging hours in this month. This indicates that there would be negligible benefit in charging these vehicles.

- 9.7.59 Both breakdown and recovery vehicle types will be included in the ULEZ when this is introduced.
- 9.7.60 Exemptions to the ES would apply to Ministry of Defence (MoD) vehicles that are exempt from the Vehicle Excise and Registration Act 1994 and used for military purposes, known as the 'Green Fleet' (as they are khaki coloured vehicles). This is because they enjoy a statutory exemption and so it is not legally permissible to charge them. Discussions with the MoD during the development of the ULEZ in 2014 indicated that the MoD would endeavour to comply with the Euro 6/VI emissions standard where possible. Civilian registered vehicles operated by the MoD would be subject to the ES.
- 9.7.61 Off-road machinery (eg tractors and mobile cranes) typically uses engines certified to different standards than those for road-going vehicles. When these machines are converted to run on the roads they are exempt due to their unsuitability for conversion to an alternate fuel or engine replacement. The Non-Road Mobile Machinery (NRMM) LEZ was introduced in 2015, with tighter standards coming in from 2020, and is designed to tackle emissions from this source through planning conditions.
- 9.7.62 We are not proposing any exemption for private ambulances.
- 9.7.63 HGVs are a significant contributor to NO<sub>x</sub> and PM emissions in central London and so will not be exempt from the ES.
- 9.7.64 In practical terms, it would be extremely difficult to define and implement an exemption for 'key workers' and those that 'have' to travel by car. For these groups of people there is an option to change to a compliant vehicle to avoid paying the charge.
- 9.7.65 There are similar difficulties in defining and implementing a special dispensation for small or micro businesses.
- 9.7.66 Emissions from private cars make up a significant proportion of NO<sub>x</sub> emissions in central London, particularly amongst pre-Euro 4 vehicles, so exempting them would significantly reduce the emissions benefits of the scheme.

## **9.8 Theme G: Impacts**

- 9.8.1 The following 23 stakeholders commented on this theme: Association of Vehicle Recovery Operators, British Motorcyclists Federation, BVRLA, CBI, DHL, Ealing Community Transport Charity, European Rescue & Recovery Initiative, Federation of Small Businesses, GMB, Justine Greening MP, Leonie Cooper AM, Licensed Private Hire Car Association, London

Borough of Enfield, London Borough of Lewisham, London Borough of Tower Hamlets, London Borough of Wandsworth, London First, Motorcycle Action Group, Musicians' Union, RAC, Rt Hon Joan Ryan MP, SMMT and Volvo.

- 9.8.2 Of the public and business responses, 1,823 comments were received in relation to impacts, however, due to the fact that it was not always clear whether the comments were in relation to the ES or the ULEZ, some would have been under the ULEZ proposals.

***Issues raised in relation to this theme***

- ***The scheme will disproportionately affect poorer Londoners***
- ***Concern around the impact on small businesses***
- ***Concern around the impact on older and disabled people***

***The scheme will disproportionately affect poorer Londoners***

- 9.8.3 The following eight stakeholders expressed concern that the ES would disproportionately affect poorer Londoners: GMB, Justine Greening MP, Leonie Cooper AM, Licensed Private Hire Car Association, London Borough of Enfield, Motorcycle Action Group, Musicians' Union and RAC.

- 9.8.4 Of the public and business responses, 1,010 comments were received in relation to this issue.

***TfL response***

- 9.8.5 Generally only vehicles that currently pay the Congestion Charge will be liable for the ES. Lower income Londoners tend not to drive in the Congestion Charge zone during charging hours. There are alternative transport options available within the Congestion Charge zone for lower income drivers. Residents who may be on lower incomes will benefit from a 90 per cent discount on the charge.
- 9.8.6 Analysis carried out on behalf of the GLA and published in 2016, highlighted that the health impacts of air pollution disproportionately affect the most vulnerable and deprived communities. Among the top 10 per cent of London's most deprived areas, half have NO<sub>2</sub> levels exceeding legal limits. For the top 10 per cent of least deprived areas, only one per cent experience NO<sub>2</sub> concentrations that exceed legal limits.
- 9.8.7 The IIA indicated that there would be a negligible negative impact on people in lower socio-economic groups.
- 9.8.8 TfL and the Mayor have a duty to take early action on London's air quality and improve the health of Londoners.

### ***Concern around the impact on small businesses***

- 9.8.9 The following 14 stakeholders expressed concern about the impact of the ES on small businesses: Association of Vehicle Recovery Operators, CBI, DHL, European Rescue & Recovery Initiative, Federation of Small Businesses, Justine Greening MP, London Borough of Lewisham, London Borough of Tower Hamlets, London Borough of Wandsworth, London First, Musicians' Union, RAC, SMMT and Volvo.
- 9.8.10 Of the public and business responses, 331 comments were made in relation to this issue.

### ***TfL response***

- 9.8.11 The standard will affect around four per cent of vans and HGVs entering the Congestion Charging zone. For non-compliant vehicles, there are options to pay the charge or upgrade to a compliant vehicle. The charge level has been set to enable occasional trips within the Congestion Charge zone to be made. There is also an option for some to retime journeys to a time outside the ES hours of operation.
- 9.8.12 It is not practical to create a discount or exemption for small businesses, given the cost of and difficulty of administering such a scheme.
- 9.8.13 The IIA did note that the ES would have a minor negative impact on some small businesses at a micro-economic level. TfL and the Mayor have a duty to take early action on London's air quality and improve the health of Londoners. The cost of compliance associated with the ES should be balanced against the air quality and health benefits of the scheme.
- 9.8.14 It is not recommended that an exemption or discount be included for small businesses. However, the Mayor recognises that more can be done by government to help reduce the financial burden of removing old polluting vehicles from London's roads. Therefore, he has called for a diesel scrappage scheme to reduce the cost to affected vehicle owners.

## **9.9 TFL recommendation**

- 9.9.1 TfL recommend that the Mayor confirms the VO as originally consulted with no modifications

## 10. ULEZ issues raised

### 10.1 Introduction

- 10.1.1 This chapter sets out our analysis of the responses received to the ULEZ aspect of the consultation by theme and our reaction to the comments, issues and recommendations contained in those responses. Comments from stakeholders and free text responses from the public and business respondents have been attributed to the most pertinent aspect of the proposal. Within each theme, the 'issues raised' during the consultation that go to make up that theme have been identified and are listed at the start of each section, followed by our response and any recommendations. Where issues are similar, these have been grouped together for a single TfL response.
- 10.1.2 As no formal proposals were put forward for consultation and no final decision is to be taken on the ULEZ proposals, we will consider the feedback received in this non-statutory consultation further when developing the proposals for alterations to the ULEZ.
- 10.1.3 This chapter brings together comments from stakeholders, the public and businesses, including data from the questionnaire, as set out in full in Chapter 5.
- 10.1.4 The themes addressed are as follows:
- ***Theme A: Principle of a ULEZ***
  - ***Theme B: Vehicle emissions standards***
  - ***Theme C: Boundary***
  - ***Theme D: Charge level***
  - ***Theme E: Timetable***
  - ***Theme F: Discounts and exemptions***
  - ***Theme G: Impacts***

### 10.2 Theme A: Principle of a ULEZ

- 10.2.1 The following 46 stakeholders made comments on this theme: Alliance of British Drivers, British Lung Foundation, BVRLA, BYD UK, CEMEX, ClientEarth, Cross River Partnership, Environmental Protection UK, Friends of the Earth, Global Action Plan, Greenpeace, Heathrow Airport Ltd, Institute of Air Quality Management, Licensed Private Hire Car Association, Living Streets, London Assembly Conservative Group, London Assembly Environment Committee, London Assembly Green Party Group, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Barking and Dagenham, London Borough of Brent, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Hammersmith & Fulham, London Borough of Havering, London Borough

of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Bus Museum, London Cycling Campaign, London Sustainability Exchange, Merton Conservatives Council Group, Motorcycle Action Group, National Express, Seb Dance MEP, SMMT, Stephen Knight (Former AM), The Clapham Society, Uber, UK Health Forum, University College London, Volvo, West End Community Network and The Air We Breathe.

***The issues raised in relation to this theme***

- ***Support and opposition to the ULEZ principle***
- ***Comments on the naming of the ULEZ***

***Support and opposition to the ULEZ principle***

- 10.2.2 The following 42 stakeholders stated their support for the principle of a ULEZ: British Lung Foundation, BVRLA, BYD UK, CEMEX, ClientEarth, Cross River Partnership, Environmental Protection UK, Friends of the Earth, Global Action Plan, Greenpeace, Heathrow Airport Ltd, Institute of Air Quality Management, Licensed Private Hire Car Association, Living Streets, London Assembly Environment Committee, London Assembly Green Party Group, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Barking and Dagenham, London Borough of Brent, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Hammersmith & Fulham, London Borough of Havering, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Bus Museum, London Cycling Campaign, London Sustainability Exchange, Merton Conservatives Council Group, National Express, Seb Dance MEP, SMMT, Stephen Knight (Former AM), The Clapham Society, Uber, UK Health Forum, University College London, West End Community Network and The Air We Breathe.
- 10.2.3 The following two stakeholders stated their opposition to the principle of a ULEZ: Alliance of British Drivers and the Motorcycle Action Group.
- 10.2.4 The London Assembly Conservative Group supports the introduction of the ULEZ within the existing Congestion Charging zone, but opposed the extension of the ULEZ up to the North and South Circular Roads.
- 10.2.5 Of the public and business respondents, 1,114 commented in support of the ULEZ, which is equivalent to around seven per cent of respondents. There were 128 respondents who commented in opposition of the ULEZ on the basis that emissions from the manufacture of vehicles outweigh the emissions savings of the ULEZ.

***TfL response***

- 10.2.6 We welcome the support for the principle of a ULEZ and note the opposition. The ULEZ was agreed in March 2015 and will be implemented

on 7 September 2020 in central London unless there is a statutory consultation to remove or modify it.

- 10.2.7 As stated in the Consultation and information document, no formal proposals for modification were put forward during the consultation, although the Mayor and TfL are seeking views on ideas for introducing it sooner and making it larger. If these ideas are progressed, they would be subject to statutory consultation later this year.

### ***Comments on the naming of the ULEZ***

- 10.2.8 Environmental Protection UK (EPUK), the Institute of Air Quality Management (IAQM), the Royal Borough of Greenwich and Volvo commented on the naming of the ULEZ.
- 10.2.9 The IAQM and Volvo commented on the potential for confusion with Defra Clean Air Zones, with IAQM stating that 'ultra low' should be reserved for ultra low emission vehicles as defined by OLEV. The Royal Borough of Greenwich and EPUK commented on the potential confusion of a ULEZ referring to multiple zones.

### ***TfL response***

- 10.2.10 We recognise that there is potential for confusion and ambiguity around the terminology 'ultra low,' particularly if it refers to multiple zones and differs in terminology with the government definition of an ultra low emission vehicle. We will consider this whilst developing formal proposals for the future of the ULEZ, but this will need to be balanced against the existing name recognition of the ULEZ.

## **10.3 Theme B: Vehicle emissions standards**

- 10.3.1 The following 15 stakeholders made comments on this theme: British Lung Foundation, ClientEarth, Environmental Protection UK, FirstGroup, Friends of the Earth, Greenpeace, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Ealing, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Islington, London Councils, Stephen Knight (Former AM), UKLPG and Volvo.
- 10.3.2 Of the public and business respondents, 468 comments were made on emissions standards.

### ***Issues raised in relation to this theme***

- ***Opposition to the Euro 6 diesel standard***
- ***General comments on Euro standards***
- ***Other comments on emissions standards***

### ***Opposition to the Euro 6 diesel standard***

- 10.3.3 The following eight stakeholders argued that the Euro 6 diesel standard should not be allowed in the ULEZ without charge: ClientEarth, Environmental Protection UK, Friends of the Earth, Greenpeace, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Hackney, London Borough of Islington and Stephen Knight (Former AM).
- 10.3.4 Greenpeace suggested that Euro 6 diesel vehicles bought after the announcement of the ULEZ should not be allowed to enter the ULEZ without charge.

### ***TfL response***

- 10.3.5 We have studied available evidence on the performance of Euro 6/VI vehicles and conducted our own testing to assess the 'real-world' performance of this standard in typical London driving conditions<sup>17</sup>. While Euro 6/VI produces higher emissions than specified in the Euro standard, these vehicles are nevertheless performing much better than previous Euro standards. We continue to lobby government in the UK and Europe to ensure that Euro 6 is implemented in the most effective way to control emissions.
- 10.3.6 For heavy vehicles, in particular, there is no alternative to diesel. Charging all Euro VI vehicles would therefore result in more people paying the charge, rather than upgrading to a cleaner vehicle. Furthermore, there would be no incentive to upgrade from a Euro V diesel vehicle to a cleaner Euro VI diesel vehicle, resulting in higher emissions.
- 10.3.7 Nonetheless, as with the London LEZ, the ULEZ standards will be kept under review to ensure that they remain appropriate.
- 10.3.8 We do not hold data on the date of purchase for vehicles and so would be unable to enforce a system on the basis suggested by Greenpeace.

### ***General comments on Euro standards***

- 10.3.9 The following four stakeholders commented on the use of Euro standards: FirstGroup, London Borough of Ealing, London Borough of Islington and London Councils.

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<sup>17</sup> [content.tfl.gov.uk/in-service-emissions-performance-of-euro-6vi-vehicles.pdf](https://content.tfl.gov.uk/in-service-emissions-performance-of-euro-6vi-vehicles.pdf)

- 10.3.10 FirstGroup requested publication of confirmation that the standard imposed by the ULEZ will be one which can be met using commercially available retrofit technology.
- 10.3.11 London Councils, London Borough of Ealing and London Borough of Islington raised issues with the validity of the Euro standard emissions tests, particularly as the vehicles do not perform as well in real-world conditions. The London Borough of Islington suggested that a standard based on real-world emissions could be introduced.

***TfL response***

- 10.3.12 The Euro standards set out clear standards for emissions control, which are enshrined in European legislation and recognised across the world. As such, it is a mechanism that is recognised by motor manufacturers, fleet operators and drivers alike. Vehicles have been manufactured to these standards since the early 1990s, the system is well-established and vehicles are very widely available. This means that it is an appropriate way to identify those vehicles that are built to the most up-to-date standards.
- 10.3.13 Robust and complete data for the real-world driving emissions of all vehicle models is not readily available. It is not practical or cost effective for us to undertake bespoke testing of all vehicle types that may enter London. Although some vehicle types, particularly diesel cars, emit more emissions under real-world driving conditions compared to the Euro standard testing conditions, the emissions of Euro 6 vehicles are still lower in the real world compared to the previous Euro standards. Furthermore, real-world driving emissions of new Euro 6 vehicles are also expected to improve over time as the testing regime is improved, in particular, to include an element of on-road verification (known as Euro 6c and Euro 6d).
- 10.3.14 TfL and the GLA continue to lobby for a faster and more stringent introduction of real-world emissions testing for light duty vehicles. We feel this is a more practical approach than introducing a London-specific standard based on real-world testing as a repeatable, standardised approved test for all vehicles does not yet exist.
- 10.3.15 The Government is intending to introduce a national retrofit certification standard. We will be using this standard to identify any pre-Euro VI vehicles retrofitted to meet the Euro VI standard.

***Other comments on emissions standards***

- 10.3.16 The following six stakeholders raised additional comments on emissions standards: British Lung Foundation, London Borough of Ealing, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Islington and Volvo.
- 10.3.17 The London Borough of Islington raised concerns about emissions from hybrid buses and requested independent real-world emissions data.

- 10.3.18 The London Borough of Islington and London Borough of Ealing stated that the emissions standard for motorcycles and other L-Category vehicles should be set at Euro 4 in line with other petrol vehicles.
- 10.3.19 The London Borough of Hackney suggested the inclusion of cars in the LEZ, initially at an equivalent Euro 4 standard and potentially rising to Euro 6 for diesel cars, at a later date.
- 10.3.20 The London Borough of Hammersmith & Fulham stated there should be a stricter standard for the ULEZ in 2019.
- 10.3.21 Volvo suggested a Euro V emissions standard Londonwide from 2019, increasing to Euro VI in 2022.

***TfL response***

- 10.3.22 We have undertaken extensive testing of our bus fleet using a chassis dynamometer test, which replicated real-life driving conditions on the central and suburban roads found on route 159. It found that Euro VI hybrid buses produced around 95 per cent less NO<sub>x</sub> than a Euro V equivalent. We are satisfied that the hybrid Euro VI buses are performing to the expected emissions standards.
- 10.3.23 The Euro standards for motorcycles are less well developed than for other vehicle types, and Euro 4 is being introduced in phases between 2015 and 2017, meaning there would be higher costs of compliance and a limited second-hand market. We do not feel it is equitable or necessary to require motorcycles, mopeds and other L-Category vehicles to meet a more stringent standard than other petrol vehicles.
- 10.3.24 No firm proposals on the expansion of the ULEZ have been put forward as part of this consultation. However, a Londonwide Euro 4 standard in 2019 or 2020 is unlikely to bring significant emissions benefits in relation to the costs of the infrastructure and systems required to enforce such a measure. This is because we estimate that 88 per cent of cars in outer London would already comply with this standard in 2019. In addition, the camera network required to enforce a ULEZ that includes cars in outer London would be extensive, compared to the existing camera network for the LEZ, which focuses on strategic routes used by heavy vehicles.
- 10.3.25 During the development of the original ULEZ, a standard stricter than Euro 4 for petrol was considered. However, both Euro 4 petrol and Euro 6 diesel vehicles have the same NO<sub>x</sub> limit of 0.08g CO<sub>2</sub>/km so it was felt that petrol and diesel vehicles were being treated equally. In addition, including Euro 4 petrol vehicles, without any detriment in terms of NO<sub>x</sub> emissions helps reduce the cost of compliance of the scheme by enabling the option to use an up to 14-year-old petrol car when the scheme is introduced in 2020.
- 10.3.26 There is no Euro standard beyond Euro 6 (eg Euro 7), therefore a standard stricter than Euro 6 would have to consider a 'near zero' or zero emission standard (for example less than 75g CO<sub>2</sub>/km). However, there will not be

sufficient vehicles being used or commercially available by 2019 to make this standard achievable over a wide area.

- 10.3.27 Euro V heavy duty vehicles, whilst showing minor improvements in PM, emit significant amounts of NO<sub>x</sub>, with minimal improvement over Euro IV vehicles. In some circumstances, Euro V vehicles emit more NO<sub>x</sub> than Euro IV vehicles. There would be limited benefits in introducing a Euro V standard, whereas testing of Euro VI vehicles indicates an on-road reduction in NO<sub>x</sub> emissions of over 80 per cent on average.

## **10.4 Theme C: Boundary**

- 10.4.1 The following 91 stakeholders made comments on this theme: Alliance of British Drivers, Autogas, Baroness Jenny Jones, Better Bankside, Brewery Logistics Group, British Lung Foundation, British Motorcyclists Federation, Brixton BID, BYD UK, Calor Gas, Camden Town Unlimited, Campaign for Better Transport (London), City of London Corporation, Client Earth, Cross River Partnership, Direct Line, Environmental Industries Commission, Environmental Protection UK, European Rescue & Recovery Initiative, First Group, Ford Motor Company, Friends of Capital Transport Campaign, Friends of the Earth, Global Action Plan, GMB, Greenpeace, HCT Group, Heathrow Airport Ltd, Herefordshire County Council, Imperial College London, John Lewis Partnership, Justine Greening MP, Kingston and Sutton Shared Environment Service, Land securities, Leonie Cooper AM, Licensed Taxi Drivers Association, London Assembly Environment Committee, London Assembly Green Party Group, London Association of Directors of Public Health and the London Environment Directors Network (joint response), London Borough of Barking and Dagenham, London Borough of Brent, London Borough of Camden, London Borough of Croydon, London Borough of Ealing, London Borough of Enfield, London Borough of Hackney, London Borough of Haringey, London Borough of Havering, London Borough of Hounslow, London Borough of Islington, London Borough of Lewisham, London Borough of Redbridge, London Borough of Richmond-upon-Thames, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Waltham Forest, London Borough of Wandsworth, London Councils, London Cycling Campaign, London Fire Brigade, London Sustainability Exchange, London Taxi Company, London Tourist Coach Operators Association, Merton Conservatives Council Group, National Association of Road Transport Museums, National Franchise Dealers Association, New West End Company, Private Hire Board, RAC, Road Haulage Association, Royal Borough of Greenwich, Royal Borough of Kensington and Chelsea, Rt Hon Joan Ryan MP, Seb Dance MEP, SMMT, Stephen Knight (Former Assembly Member), Sustrans, Team London Bridge, The Clapham Society, The Crown Estate, The Original London Sightseeing Tour, The UK Health Alliance on Climate Change, Uber, UK Health Forum, Unite the Union, University College London, UPS, Urban Partners, Waitrose, West End Community Network and [www.theairwebreathe.uk](http://www.theairwebreathe.uk)

10.4.2 Of the public and business responses, 963 comments were made on this theme.

10.4.3 Issues raised in relation to this theme:

- ***Support and opposition to the North and South Circular boundary for all vehicles***
- ***Support and opposition to the Londonwide expansion for heavy vehicles***
- ***More detail requested on the impacts of the boundary***

***Support and opposition to the North and South Circular boundary for all vehicles***

10.4.4 Details of general support and opposition are set out in section 0

10.4.5 The following 22 stakeholders support the expansion of the ULEZ but believe the scheme should be expanded Londonwide for all vehicles: Association of Directors of Public Health for London Environment Directors' Network (joint response), Baroness Jenny Jones, BYD UK, Caroline Russell AM, ClientEarth, Leonie Cooper AM, London Borough of Barking and Dagenham, London Borough of Camden, London Borough of Ealing, London Borough of Enfield, Royal Borough of Greenwich, London Borough of Hackney, London Borough of Islington, London Borough of Lewisham, London Borough of Redbridge, London Borough of Southwark, London Borough of Tower Hamlets, London Borough of Waltham Forest, London Councils, London Sustainability Exchange, Rt Hon Joan Ryan MP and Unite the Union.

10.4.6 This was supported by 307 public respondents.

10.4.7 Sustrans also proposed the expansion of the ULEZ Londonwide for all vehicles, but by 2025.

10.4.8 A number of stakeholders proposed expanding the ULEZ for all vehicles beyond the North and South Circular Roads to cover other pollution hotspots in London. The Clapham Society thought it should include the area around Heathrow Airport. The London Borough of Brent suggests it should include town centres in outer London with high levels of pollution.

10.4.9 The London Borough of Hounslow suggests that a number of different charging zones or 'cordons' could be created which even extend outside the boundary of the M25. It also expressed a concern that the proposed ULEZ boundary of the North and South Circular Roads creates a potential obstacle to residents making intra-borough journeys into Chiswick, if their vehicles are non-compliant with the proposed emissions standards.

10.4.10 The British Lung Foundation suggests that the boundary for an expanded ULEZ should be set based on modelling of pollution hotspots.

- 10.4.11 The City of London Corporation states that it will wait for detailed emissions modelling before supporting the expanded ULEZ. SMMT stated that further analysis needed to be undertaken.
- 10.4.12 The London Borough of Haringey supports the expansion of the ULEZ up to the North and South Circular Roads in principle, but would also want measures such as extensions of the Mayor's 'clean bus corridors' (Low Emission Bus Zones) to routes in the borough.
- 10.4.13 National Express states that expanding the ULEZ up to the North and South Circular Roads would be preferable to a Londonwide expansion.
- 10.4.14 Justine Greening MP is concerned that the ULEZ boundary based on the North and South Circular Roads could create confusion for some residents and businesses. She also believes that the boundary may only encourage people to use different local traffic routes, bringing further pollution to residential streets immediately outside the ULEZ.
- 10.4.15 The London Borough of Lambeth is concerned about the boundary bisecting its borough, and its support for the scheme is dependent on detailed modelling of its emissions impacts.
- 10.4.16 The London Borough of Lambeth suggests it may be more cost effective and less confusing to expand the ULEZ Londonwide.

***Support and opposition to the Londonwide expansion for heavy vehicles***

- 10.4.17 Details of support and opposition are set out in section 0.
- 10.4.18 FirstGroup believes the introduction of a Londonwide ULEZ for heavy vehicles in 2019 would result in the need for businesses to undertake expensive retrofitting of Euro V vehicles which are not due for replacement. National Express also states that 2019 would be too early for a Londonwide expansion, and calls for clarity on the retrofit of older vehicles.
- 10.4.19 The Road Haulage Association states that further regulation around Euro VI heavy vehicles will not be required as the industry will move to adopt these vehicles naturally.

***TfL response***

- 10.4.20 No formal proposals for the ULEZ boundary were put forward in the consultation. We will consider this feedback further if the Mayor instructs us to put forward detailed proposals for statutory consultation. Full details, including costs, benefits and impacts will be provided as part of this.

***More detail requested on the impacts of the boundary***

- 10.4.21 The following 13 stakeholders requested further information on the impacts of the changes to the ULEZ boundary before they could make a decision:

City of London Corporation, London Borough of Brent, London Borough of Camden, London Borough of Ealing, London Borough of Haringey, London Borough of Havering, London Borough of Lambeth, London Borough of Lewisham, London Borough of Richmond upon Thames, London Borough of Tower Hamlets, London Borough of Wandsworth, London Councils and Hertfordshire County Council.

***TfL response***

- 10.4.22 We will be providing full information on the impacts of changes to the ULEZ as and when detailed statutory proposals are developed and consulted on.

**10.5 Theme D: Charge level**

- 10.5.1 The following 43 stakeholders commented on this theme: Autogas, Better Bankside, Brewery Logistics Group, British Lung Foundation, British Motorcyclists Federation, Brixton BID, Calor Gas, Camden Town Unlimited, Caroline Russell AM, CEMEX, ClientEarth, Direct Line, European Rescue & Recovery Initiative, Federation of Small Businesses, Friends of the Earth, GMB, Greenpeace, Hertfordshire County Council, John Lewis Partnership, Land Securities, Living Streets, London Borough of Brent, London Borough of Camden, London Borough of Ealing, London Borough of Islington, London Borough of Tower Hamlets, London Borough of Waltham Forest, London City Airport, London Fire Brigade, London Tourist Coach Operators Association (LTCOA), Motorcycle Industry Association, National Franchised Dealers Association, New West End Company, Private Hire Board, Royal Borough of Greenwich, Seb Dance MEP, Sustrans, The Air We Breathe, The Crown Estate, The Original London Sightseeing Tour, Waitrose and West End Community Network.

***Issues raised in relation to this theme***

- ***Support and opposition to a lower level charge for inner London***
- ***Other comments on ULEZ charging levels***

***Support and opposition to a lower level charge for inner London***

- 10.5.2 The following 26 stakeholders supported having the same charge level in inner London as in central London: Better Bankside, Brewery Logistics Group, British Lung Foundation, Camden Town Unlimited, Caroline Russell AM, ClientEarth, Direct Line, Friends of the Earth, GMB, Greenpeace, Hertfordshire County Council, John Lewis Partnership, Land Securities, Living Streets, London Borough of Camden, London Borough of Ealing, London Borough of Islington, London Borough of Tower Hamlets, London Borough of Waltham Forest, LTCOA, Royal Borough of Greenwich, Seb Dance MEP, Sustrans, The Crown Estate, The Original London Sightseeing Tour and Waitrose

- 10.5.3 The following 16 stakeholders supported a lower charge level in inner London than in central London: Autogas, British Motorcyclists Federation, Brixton BID, Calor Gas, CEMEX, European Rescue & Recovery Initiative, Federation of Small Businesses, London Borough of Brent, London City Airport, London Fire Brigade, Motorcycle Industry Association, National Franchised Dealers Association, New West End Company, Private Hire Board, The Air We Breathe and West End Community Network,
- 10.5.4 The public and business comments on charge levels are set out in Chapter 6 of this report.

***TfL response***

- 10.5.5 We note the comments on the potential charge levels. No formal proposals for the ULEZ charge level were put forward in the consultation. We will consider this feedback further if the Mayor instructs us to put forward detailed proposals for statutory consultation. Full details, including costs, benefits and impacts will be provided as part of this.

***Other comments on ULEZ charging levels***

- 10.5.6 The following six stakeholders commented on this issue: London Borough of Hackney, London Borough of Islington, National Express, Caroline Russell AM, London Borough of Barking and Dagenham and GMB.
- 10.5.7 The London Borough of Hackney stated there could be a lower level charge that increases over time.
- 10.5.8 The London Borough of Islington stated that the charge should be £1,000 for heavy vehicles.
- 10.5.9 National Express stated the importance of the charge for passenger transport vehicles being proportionate to that for private cars.
- 10.5.10 Caroline Russell AM queried whether there would be an additional charge for travelling into central London on top of any inner zone charge.
- 10.5.11 The London Borough of Barking and Dagenham and GMB stated that the differential between light and heavy duty vehicles should be re-examined.

***TfL response***

- 10.5.12 No formal proposals for the ULEZ charge level were put forward in the consultation. We will consider this feedback further if the Mayor instructs us to put forward detailed proposals for statutory consultation. Full details, including costs, benefits and impacts will be provided as part of this.

**10.6 Theme E: Timetable**

- 10.6.1 The 33 following stakeholders commented on this theme: Brewery Logistics Group, British Lung Foundation, CBI, City of London Corporation,

Confederation of Passenger Transport UK, Environmental Industries Commission, Environmental Protection UK, European Rescue & Recovery Initiative, Freight Transport Association, Heathrow Airport Ltd, John Lewis Partnership, Kingston and Sutton Shared Environment Service, Licensed Private Hire Car Association, Licensed Taxi Drivers' Association, Living Streets, London Assembly Environment Committee, London Borough of Brent, London Borough of Camden, London Borough of Hackney, London Borough of Haringey, London Borough of Havering, London Borough of Hounslow, London Borough of Islington, London Borough of Redbridge, The London Taxi Company, The Royal Borough of Kingston, London Tourist Coach Operators Association, National Express, Royal Borough of Greenwich, Royal Borough of Kensington and Chelsea, Stephen Knight (Former AM), The Original London Sightseeing Tour, Volvo and Waitrose.

***Issues raised in relation to this theme***

- ***Support and opposition to the implementation of the ULEZ in central London in 2019***
- ***Date of a Londonwide expansion of the ULEZ for heavy vehicles***
- ***Date of an expansion of the ULEZ for all vehicles up to the North and South Circular Roads***

***Support and opposition to the implementation of the ULEZ in central London in 2019***

- 10.6.2 Stakeholder support and opposition to the introduction of the central zone is set out in section 0
- 10.6.3 Stakeholders opposing the 2019 implementation generally cited concerns around the lack of time and the cost for businesses already preparing for an implementation of the ULEZ in central London in 2020.
- 10.6.4 CEMEX stated that if the implementation date were to be brought forward to 2019, it should be at the end of 2019.

***Date of a Londonwide expansion of the ULEZ for heavy vehicles***

- 10.6.5 Stakeholder support and opposition to the introduction of the Londonwide expansion for heavy vehicles in general is set out in section 0.
- 10.6.6 Generally speaking, stakeholders who supported the expansion Londonwide supported its introduction in 2019.
- 10.6.7 However, Justine Greening MP, Rt Hon Joan Ryan MP, London Borough of Brent, London Borough of Havering, London Borough of Wandsworth, City of London Corporation, DHL and London First indicated no preference on the implementation date.

- 10.6.8 The Kingston and Sutton Shared Environment Service, UPS, London Fire Brigade, Environmental Industries Commission, HCT Group, Camden Town Unlimited and Calor Gas indicated their preference for a 2020 implementation.
- 10.6.9 The John Lewis Partnership, Waitrose and Brewery Logistics Group indicated their preference for a 2021 implementation date.
- 10.6.10 Whilst Volvo were generally opposed to a Londonwide expansion, they suggested a 2022 implementation would be more acceptable
- 10.6.11 The LTCOA, European Rescue & Recovery Initiative, The Original London Sightseeing Tour and Private Hire Board indicated their preference for a later date, with Private Hire Board specifying 2024.

***Date of an expansion of the ULEZ for all vehicles up to the North and South Circular Roads***

- 10.6.12 Stakeholder support and opposition to the expansion of the ULEZ up to the North and South Circular Roads for all vehicles, in general, is set out in section 0
- 10.6.13 Stakeholders who supported the expansion of the ULEZ up to the North and South Circular Roads or beyond, support its introduction in 2019.
- 10.6.14 However, DHL, London Bus Museum and Westminster City Council made no specific comments on the implementation date.
- 10.6.15 The Royal Borough of Kingston, National Association of Road Transport Museums, Uber, UPS, West End Community Network, London Fire Brigade, GMB, Environmental Industries Commission, HCT Group, London First and Calor Gas indicated a preference for a 2020 implementation date.
- 10.6.16 Waitrose, John Lewis Partnership, New West End Company, Camden Town Unlimited, Brewery Logistics Group and National Franchised Dealers Association indicated a preference for a 2021 date.
- 10.6.17 Whilst Volvo was generally opposed to the expansion of the ULEZ up to the North and South Circular Roads for all vehicles, it suggested a 2022 implementation would be more acceptable.
- 10.6.18 The LTCOA, European Rescue & Recovery Initiative, The Original London Sightseeing Tour and Private Hire Board indicated their preference for a later date, with the Private Hire Board specifying 2024.

***TfL response***

- 10.6.19 No formal proposals for the ULEZ implementation date were put forward in the consultation. We will consider this feedback further if the Mayor instructs us to put forward detailed proposals for statutory consultation. Full details, including costs, benefits and impacts will be provided as part of this.

## **10.7 Theme F: Discounts and exemptions**

10.7.1 The following 66 stakeholders commented on this theme: Association of Vehicle Recovery Operators, Better Bankside, Brewery Logistics Group, British Lung Foundation, British Motorcyclists Federation, Brixton BID, Calor Gas, Camden Town Unlimited, Campaign for Better Transport (London), City of London Corporation, Direct Line, Ealing Community Transport Charity, Federation of British Historic Vehicle Clubs, FirstGroup, Ford Motor Company, Friends of Capital Transport Campaign, Friends of the Earth, Global Action Plan, GMB, HCT Group, Imperial College London, John Lewis Partnership, Kingston and Sutton Shared Environment Service, Land Securities, Licensed Private Hire Car Association, Licensed Taxi Drivers' Association, Living Streets, London Borough of Ealing, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Haringey, London Borough of Hounslow, London Borough of Islington, London Borough of Lambeth, London Borough of Southwark, London Borough of Waltham Forest, London Bus Museum, London City Airport, London Councils, London Sustainability Exchange, The London Taxi Company, London Tourist Coach Operators Association, London TravelWatch, Merton Conservatives Council Group, Musicians' Union, National Association of Road Transport Museums, National Association of Wedding Car Professionals, National Franchised Dealers Association, New West End Company, Private Hire Board, RAC, Road Haulage Association, Royal Borough of Greenwich, Seb Dance MEP, Stephen Knight (Former AM), The Community Transport Association, Team London Bridge, The Crown Estate, The Original London Sightseeing Tour, UK Health Alliance on Climate Change, Uber, UK Health Forum, Volvo, Waitrose, West End Community Network, Westminster City Council and The Air We Breathe.

### ***Issues raised in relation to this theme:***

- ***Support and opposition to the residents' 'sunset period'***
- ***Support and opposition to the exemption for motorcycles***
- ***Support and opposition to the exemption for PHVs***
- ***Support and opposition to the exemption for historic vehicles***
- ***Comments on the 'sunset period' for disabled tax class vehicles***
- ***Support and opposition to other exemptions***

### ***Support and opposition to the residents' 'sunset period'***

10.7.2 The following seven stakeholders commented on the residents' 'sunset period': Greenpeace, Living Streets, London Borough of Barking and Dagenham, London Borough of Lambeth, London Borough of Islington, London Borough of Lewisham and London Borough of Tower Hamlets.

10.7.3 Greenpeace supported residents being liable for the ULEZ after three years.

- 10.7.4 Living Streets and the London Borough of Barking and Dagenham raised concerns with the residents' 'sunset period' undermining the scheme and the London Borough of Lambeth and London Borough of Islington stated that the residents' 'sunset period' should be reconsidered.
- 10.7.5 The London Borough of Lewisham and London Borough of Tower Hamlets requested that a residents' discount be considered for an expanded zone and details of this should be provided in the next consultation.

***Support and opposition to the exemption for motorcycles***

- 10.7.6 The British Motorcyclists Federation, Motorcycle Industry Association and Motorcycle Action Group proposed that motorcycles should be exempt from the ULEZ.

***Support and opposition to the exemption for PHVs***

- 10.7.7 GMB suggested that the standard should be Euro 5 for PHVs.
- 10.7.8 Uber suggested that the 'sunset period' for disabled tax class vehicles should also apply to wheelchair accessible PHVs.

***Support and opposition to the exemption for historic vehicles***

- 10.7.9 The Federation of British Historic Vehicle Clubs, London Borough of Southwark, and National Association of Road Transport Museums commented on the historic vehicle exemption to the ULEZ.
- 10.7.10 The National Association of Road Transport Museums provided additional detail on historic vehicle usage in London and raised concerns that the pollution from these vehicles was overstated.
- 10.7.11 The Federation of British Historic Vehicle Clubs queried the distinction between historic vehicles and commercial vehicles constructed before 1973.
- 10.7.12 The London Borough of Southwark raised concerns that the exemption for historic vehicles was unfair.

***Comments on the 'sunset period' for disabled tax class vehicles***

- 10.7.13 The Community Transport Association raised concerns that even with the 'sunset period' for disabled tax class vehicles to 2023, there would be a negative impact on community transport providers.
- 10.7.14 The Ealing Community Transport Charity requested a longer transition period for wheelchair accessible minibuses.

### ***Support and opposition to other exemptions***

- 10.7.15 The following ten stakeholders provided additional comments on ULEZ discounts and exemptions not listed above: Association of Vehicle Recovery Operators, BVRLA, Community Transport Association, European Rescue & Recovery Initiative, Federation of Small Businesses, Freight Transport Association, GMB, Hounslow Community Transport, London Borough of Islington and Volvo.
- 10.7.16 The Association of Vehicle Recovery Operators, Direct Line, European Rescue & Recovery Initiative and RAC requested a discount or exemption for licensed recovery vehicles.
- 10.7.17 The BVRLA supported a discount or 'sunset period' for SMEs and commercial vehicles that can demonstrate they are on the path to adapting to the ULEZ standards.
- 10.7.18 GMB stated that private ambulances should not be exempt from the ULEZ.
- 10.7.19 The Freight Transport Association and Greenpeace suggested there should be an additional 'sunset period' for vans of up to one year due to the later implementation of standards.
- 10.7.20 The Federation of Small Businesses requested that consideration be given to discounts, exemptions and 'sunset periods' for SMEs.
- 10.7.21 The Community Transport Association and HCT Group requested an exemption or financial assistance for community transport organisations.
- 10.7.22 The London Borough of Islington stated that it opposed the current list of exemptions from the ULEZ, but that emergency service vehicles such as fire engines and ambulances should be exempt.
- 10.7.23 Volvo requested that consideration should be given to extending the residents' 'sunset period' to businesses with vehicles 'resident' in the proposed ULEZ.

### ***TfL response***

- 10.7.24 No formal proposals for ULEZ discounts and exemptions were put forward in the consultation. We will consider this feedback further if the Mayor instructs us to put forward detailed proposals for statutory consultation. Full details, including costs, benefits and impacts will be provided as part of this.
- 10.7.25 There is currently no proposal to exempt ambulances of any kind from the ULEZ. Private ambulances will need to meet the emissions standard or pay a daily charge.
- 10.7.26 PHVs will not be exempt from the ULEZ as agreed in 2014. There are currently no plans to change this.

## **10.8 Theme G: Impacts**

10.8.1 The following 19 stakeholders commented on this theme: Association of Vehicle Recovery Operators, British Lung Foundation, Camden Town Unlimited, CBI, CEMEX, Community Transport Association, Confederation of Passenger Transport UK, DAF Trucks, DHL, Environmental Industries Commission, FirstGroup, Freight Transport Association, London Borough of Brent, London Borough of Enfield, London Borough of Havering, Motorcycle Industry Association, Musicians' Union, Road Haulage Association and SMMT.

10.8.2 Issues raised in relation to this theme:

- ***Concerns regarding the impact on small businesses***
- ***Concerns around costs to drivers and operators***
- ***Concerns regarding the impact on elderly and disabled people***
- ***Negative impact on the second-hand car market***
- ***Concerns regarding the impact on commercial bus services***
- ***Concerns around the limited impact in outer London***

### ***Concerns regarding the impact on small businesses***

10.8.3 The following 11 stakeholders commented on the potential impact on small businesses: Association of Vehicle Recovery Operators, Camden Town Unlimited, Confederation of Passenger Transport UK, DHL, Environmental Industries Commission, Freight Transport Association, London Borough of Brent, London Borough of Enfield, London Borough of Havering, Motorcycle Industry Association and Road Haulage Association.

### ***Concerns around costs to drivers and operators***

10.8.4 The following eight stakeholders raised concerns around the potential costs to drivers and operators: CEMEX, Community Transport Association, Confederation of Passenger Transport UK, DAF Trucks, DHL, FirstGroup, Musicians' Union, and SMMT.

### ***Concerns regarding the impact on elderly and disabled people***

10.8.5 The British Lung Foundation raised concerns about the potential impact on people with lung conditions who are reliant on cars for travel.

10.8.6 The Community Transport Association, Hounslow Community Transport and Ealing Community Transport Charity raised concerns that the ULEZ could reduce elderly and disabled people's access to travel.

### ***Negative impact on the second-hand car market***

10.8.7 The CBI raised concerns around the possible negative impact of the proposals on the second-hand car market.

### ***Concerns regarding the impact on commercial bus services***

- 10.8.8 FirstGroup raised concerns that a Londonwide Euro VI standard would impact on commercially operated bus services.

### ***Concerns around the limited impact in outer London***

- 10.8.9 The London Borough of Enfield and London Borough of Hackney stated that the impact of a North and South Circular Road boundary would only result in a six per cent reduction in NO<sub>x</sub> emissions in outer London.

### ***TfL response***

- 10.8.10 No formal proposals for the ULEZ were put forward in the consultation. We will consider this feedback further if the Mayor instructs us to put forward detailed proposals for statutory consultation. Full details, including costs, benefits and impacts will be provided as part of this.
- 10.8.11 The reduction quoted by the London Borough of Enfield and the London Borough of Hackney is an incorrect interpretation of the data provided to the Borough Engagement Group in July 2016. In addition, these estimates have been refined and the most recent and accurate estimates of the reductions in emissions resulting from expanding the ULEZ are presented in the Consultation and information document.
- 10.8.12 If the proposals to expand the ULEZ are progressed, we will provide full information on the impacts as part of a detailed statutory consultation.

## **10.9 TfL recommendation**

- 10.9.1 We make no specific recommendations regarding the three consultation suggestions concerning introducing the ULEZ sooner and making it larger.
- 10.9.2 We recommend to the Mayor that, in consideration of the responses to the three suggestions above concerning the future of the ULEZ, the importance of taking effective action to urgently address London's poor air quality, and the current breach of NO<sub>2</sub> limit values, TfL undertake further development work on these matters and develop statutory proposals to be consulted on later in the year.

# 11. Other issues raised

## 11.1 Introduction

11.1.1 The following section captures issues raised that did not specifically relate to either the ES or the ULEZ. It also incorporates comments made on the consultation process itself and on wider transport and environment policy.

11.1.2 The themes addressed are as follows:

- ***Theme A: Air quality***
- ***Theme B: Vehicle bans***
- ***Theme C: Financial support and revenue***
- ***Theme D: Alternative and supporting policy suggestions***
- ***Theme E: Consultation***

## 11.2 Theme A: Air quality

11.2.1 The following 65 stakeholders commented generally on air quality: Age UK London, British Lung Foundation, British Motorcyclists Federation, Brixton BID, BYD UK, CBI, Clean Air in London, ClientEarth, Community Transport Association, Confederation of Passenger Transport UK, DAF Trucks, DHL, Doosan Babcock, Ealing Community Transport Charity, Environmental Industries Commission, Federation of Small Businesses, Freight Transport Association, Friends of the Earth, Global Action Plan, GMB, Greenpeace, HCT Group, Heathrow Airport Ltd, Hertfordshire County Council, Justine Greening MP, Leonie Cooper AM, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Havering, London Borough of Hounslow, London Borough of Lambeth, London Borough of Richmond upon Thames, London Borough of Tower Hamlets, London Borough of Waltham Forest, London Borough of Wandsworth, London Bus Museum, London City Airport, London Councils, London Cycling Campaign, London Fire Brigade, London First, London Sustainability Exchange, The London Taxi Company, London TravelWatch, Motorcycle Action Group, Musicians' Union, National Association of Road Transport Museums, National Express, Private Hire Board, RAC, Royal Borough of Greenwich, Royal Borough of Kensington and Chelsea, Rt Hon Joan Ryan MP, SMMT, Sustrans, Team London Bridge, The Clapham Society, UKLPG, University College London, UPS, Urban Partners, West End Community Network, Westminster City Council, and The Air We Breathe.

### ***Issues raised in relation to this theme***

- ***Support for measures to improve air quality***
- ***Other comments on air quality***

### ***Support for measures to improve air quality***

- 11.2.2 All stakeholders listed above stated their support for measures to improve air quality.

### ***TfL response***

- 11.2.3 We welcome the general support for measures to improve air quality. As stated throughout this report and the Consultation and information document, action to reduce air pollution is essential to improving the health of people living and working in London.

### ***Other comments on air quality***

- 11.2.4 The Motorcycle Action Group disputed the figure of early deaths attributable to air pollution and stated that the consultation had exaggerated the problem of air quality.

### ***TfL response***

- 11.2.5 The figures for equivalent deaths caused by air pollution related illnesses are based on research undertaken by King's College London on behalf of the GLA and TfL. The full report explaining the figure and how it was derived is available on the GLA website.<sup>18</sup>

## **11.3 Theme B: Vehicle bans**

- 11.3.1 The following 10 stakeholders raised this issue: Baroness Jenny Jones, Clean Air in London, Ealing Transition Initiative, Friends of the Earth, Living Streets, London Assembly Green Party Group, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Hackney, Sustrans and The Air We Breathe. [www.theairwebreathe.uk](http://www.theairwebreathe.uk).
- 11.3.2 Amongst public and business respondents, 1,217 comments relating to vehicle bans were received

### ***Issues raised in relation to this theme***

- ***Mayor should implement a ban on diesel vehicles***

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<sup>18</sup> <https://www.london.gov.uk/WHAT-WE-DO/environment/environment-publications/understanding-health-impacts-air-pollution-london>

### ***Mayor should implement a ban on diesel vehicles***

- 11.3.3 The stakeholders above stated that the Mayor should ban or consider a ban on diesel in line with Paris, Madrid, Athens and Mexico City.
- 11.3.4 Amongst public and business responses, 294 provided comments on a diesel ban.
- 11.3.5 Clean Air in London stated that the ban should be punishable by the impounding of vehicles, a £1,000 fine or a jail sentence.

### ***TfL response***

- 11.3.6 The Mayor has not been given the necessary legal powers to impose a ban on diesel vehicles in London.
- 11.3.7 It is unclear how the bans in the pledged cities will operate and be enforced or how effective they will be. Our understanding of the Paris scheme is that it currently only applies to diesel vehicles registered before 1997 and that it may be strengthened to set a Euro 3/III standard in 2017.
- 11.3.8 By contrast the Mayor's air quality proposals currently set more stringent standards, have allocated funding within the TfL business plan and will be delivered in stages well before 2025.
- 11.3.9 Were the Mayor to be given the necessary legal powers by government to ban vehicles, it is unlikely these powers would extend to enabling the seizure of vehicles or the imprisonment of drivers.

## **11.4 Theme C: Financial support and revenue**

- 11.4.1 The following 26 stakeholders raised issues related to this theme: BVRLA, CEMEX, Confederation of Passenger Transport UK, Cross River Partnership, DAF Trucks, DHL, Federation of Small Businesses, Freight Transport Association, Justine Greening MP, Leonie Cooper AM, London Assembly Environment Committee, London Borough of Camden, London Borough of Enfield, London Borough of Hackney, London Borough of Haringey, London Borough of Lambeth, London Borough of Lewisham, London Borough of Redbridge, London Councils, The London Taxi Company, New West End Company, Private Hire Board, Royal Borough of Greenwich, Royal Mail Group, Seb Dance MEP and UKLPG.

### ***Issues raised in relation to this theme***

- ***Support for a diesel scrappage scheme***
- ***Support for a vehicle retrofit fund***
- ***Financial support for upgrading to compliant vehicles***
- ***Revenue generated by the ES and the ULEZ***
- ***Vehicle Excise Duty***

### ***Support for a diesel scrappage scheme***

- 11.4.2 The following 22 stakeholders stated that they supported a diesel scrappage scheme: BVRLA, Federation of Small Businesses, Freight Transport Association, Leonie Cooper AM, London Assembly Conservative Group, London Assembly Environment Committee, London Borough of Camden, London Borough of Enfield, London Borough of Haringey, London Borough of Lambeth, London Borough of Lewisham, London Borough of Redbridge, London Borough of Wandsworth, London Councils, The London Taxi Company, New West End Company, Private Hire Board, Royal Borough of Greenwich, Royal Mail Group, Seb Dance MEP and UKLPG.
- 11.4.3 218 comments from public and business responses supported a car scrappage scheme.
- 11.4.4 BVRLA suggested that a scrappage scheme could include incentives such as car rental journeys or car club membership.
- 11.4.5 The London Borough of Hackney, The Clapham Society and SMMT expressed concerns around the value for money of a diesel scrappage scheme, with the London Borough of Hackney suggesting the money would be better spent on walking and cycling alternatives.
- 11.4.6 The following seven stakeholders requested support for upgrading to compliant vehicles: CEMEX, DAF Trucks, DHL, London Borough of Lambeth, London Borough of Redbridge, Private Hire Board and Royal Mail Group.

### ***TfL response***

- 11.4.7 We are currently developing proposals for a national government-funded scrappage scheme to reduce the financial burden of complying with emissions standards. This may include options for alternatives to private car use. We welcome stakeholder support on this.

### ***Support for a vehicle retrofit fund***

- 11.4.8 The following three stakeholders suggested that there should be a vehicle retrofit fund: BVRLA, Confederation of Passenger Transport UK and Seb Dance MEP.
- 11.4.9 Sixty-two public and business responses commented on providing a vehicle retrofit fund.

### ***TfL response***

- 11.4.10 We are working with the government to develop a national retrofit certification standard. London will not be the only city introducing a Euro VI standard for heavy vehicles, therefore we believe that it would be most appropriate for central government to decide upon whether a retrofit fund would be right.

### ***Revenue generated by the ES and the ULEZ***

- 11.4.11 The Alliance of British Drivers stated that the ES was solely a revenue generating scheme.
- 11.4.12 The Cross River Partnership, Justine Greening MP, London Borough of Lewisham, London Borough of Waltham Forest, London Councils, Seb Dance MEP and Westminster City Council stated that revenue from the ES and the ULEZ should be spent on measures to improve air quality or to help vehicle owners to comply with the standards.
- 11.4.13 Amongst public and business respondents 184 comments were received with 165 stating that revenue should be spent on measures to improve air quality.

### ***TfL response***

- 11.4.14 It is not an objective of the ES to generate surplus. Its aim is to incentivise behavioural change to encourage drivers of non-compliant vehicles to upgrade to less polluting vehicles or where possible use more sustainable modes, such as public transport, walking and cycling.
- 11.4.15 The ES forms part of the Congestion Charge scheme and any revenues specifically attributable to the ES will be applied towards covering the operation of that overall scheme. However, if any surplus revenues are generated by the Congestion Charging scheme, they must be spent on relevant transport purposes, as defined in the Mayor's Transport Strategy. This would include measures to improve air quality.
- 11.4.16 Whilst the ULEZ is expected to make a small surplus initially, it is not intended as a scheme to raise revenue and the surplus is expected to decline over time as more vehicles become compliant with the standard and do not have to pay the charge. As with the Congestion Charge scheme, all surplus revenue must be spent on relevant transport purposes.

### ***Vehicle Excise Duty (VED)***

- 11.4.17 The Clapham Society, London Borough of Hackney, London Borough of Waltham Forest, London Borough of Wandsworth, London Assembly Environment Committee and UKLPG support the Mayor in his calls to have more control of VED, with SMMT reiterating their position that it should be at the national level.
- 11.4.18 Thirty comments were received from public and business respondents.

### ***TfL response***

- 11.4.19 We welcome stakeholder support for the devolution of VED to the Mayor. The Mayor continues to call on the Government to devolve VED to tackle the particular challenges faced in London, including air quality.

## 11.5 Theme D: Alternative and supporting policy suggestions

- 11.5.1 The following 68 stakeholders suggested alternative and supporting policy measures to those outlined in the consultation: Baroness Jenny Jones, Better Bankside, British Lung Foundation, BVRLA, BYD UK, Camden Town Unlimited, Campaign for Better Transport (London), CBI, CEMEX, Clean Air in London, ClientEarth, Climate Change Centre Reading, DAF Trucks, DHL, Doosan Babcock, Ealing Transition Initiative, Federation of Small Businesses, Friends of the Earth, Global Action Plan, GMB, Greenpeace, Jim Fitzpatrick MP, Licensed Private Hire Car Association, Licensed Taxi Drivers' Association, Living Streets, London Assembly Conservative Group, London Assembly Environment Committee, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Barking and Dagenham, 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 Havering, London Borough of Hounslow, London Borough of Lewisham, London Borough of Redbridge, London Borough of Richmond upon Thames, London Borough of Tower Hamlets, London Borough of Waltham Forest, London Borough of Wandsworth, London Bus Museum, London Cycling Campaign, London First, London Sustainability Exchange, The London Taxi Company, London TravelWatch, Merton Conservatives Council Group, Motorcycle Action Group, National Express, Private Hire Board, Royal Borough of Greenwich, Seb Dance MEP, SMMT, Stephen Knight (Former AM), Sustrans, Team London Bridge, The Clapham Society, Uber, UKLPG, Unite the Union, UPS, Urban Partners, Volvo, Westminster City Council and The Air We Breathe. [www.theairwebreathe.uk](http://www.theairwebreathe.uk).
- 11.5.2 Amongst public and business respondents 5,926 comments on supporting and alternative policies were received

### ***Issues raised in relation to this theme***

- ***Support and opposition to cycling***
- ***More public transport***
- ***Ultra Low Emission vehicles***
- ***Pedestrians***
- ***Idling***
- ***Freight***
- ***Buses***
- ***Taxis and PHVs***
- ***Traffic reduction***
- ***Monitoring***
- ***Other emissions sources***
- ***Other policy suggestions***

## ***Cycling***

- 11.5.3 The following 16 stakeholders commented on alternative and supporting policy suggestions related to cycling: Baroness Jenny Jones, Ealing Transition Initiative, Friends of the Earth, Living Streets, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Barking and Dagenham, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Haringey, London Borough of Waltham Forest, London Cycling Campaign, London First, London Sustainability Exchange, London TravelWatch, Sustrans and Team London Bridge.
- 11.5.4 Of the public and business respondents, 618 made comments in support of improving provision for cyclists, including more cycle lanes, cycle parking, and an extension of the Santander Cycles scheme. This represents approximately four per cent of all respondents.
- 11.5.5 The following 15 stakeholders stated that investing in and improving cycling infrastructure would encourage modal shift and improve overall air quality: Baroness Jenny Jones, Ealing Transport Initiative, Friends of the Earth, Living Streets, London Borough of Barking and Dagenham, London Borough of Hackney, London Borough of Hammersmith & Fulham, London Borough of Haringey, London Borough of Waltham Forest, London Cycling Campaign, London First, London Sustainability Exchange, London Travelwatch, Sustrans and Team London Bridge.

## ***TFL response***

- 11.5.6 We recognise the need for complementary measures to reduce traffic demand and promote alternative modes of travel. We are investing a record £154m per year in cycling over the next five years to make cycling safer and easier and to help deliver the Healthy Streets approach across London. This investment includes continued funding for the completion of initiatives such as the Mini-Holland programme, which is currently transforming the environment for pedestrians and cyclists in three outer London boroughs, and the ongoing delivery of more Quietway routes across London, with more than 20 Quietway routes to be planned or rolled-out during this Mayoral term.
- 11.5.7 We will complete the extensions of the North-South and East-West Cycle Superhighways, and work to deliver Cycle Superhighway 11 from Swiss Cottage to the West End. Consultations will begin next year on Cycle Superhighway 4 from Tower Bridge to Greenwich and Cycle Superhighway 9 from Olympia towards Hounslow, with each route tackling a number of traffic-dominated junctions.
- 11.5.8 Through increasing investment, we will also provide funding to London's boroughs through a new Liveable Neighbourhoods programme to make town centres and neighbourhoods attractive places in which to walk, cycle and spend time.

### ***More public transport***

- 11.5.9 The following eight stakeholders commented on alternative and supporting policies relating to more public transport: Baroness Jenny Jones, Friends of the Earth, Living Streets, London Borough of Croydon, London Borough of Havering, London Bus Museum, London First and National Express.
- 11.5.10 Of the public and business respondents, 648 made comments in support of improving public transport, which represents approximately four per cent of all respondents.
- 11.5.11 National Express, London Borough of Havering, London Bus Museum, Living Streets, Friends of the Earth, London First and Baroness Jenny Jones all stated that encouraging a shift to public transport and improving public transport links are fundamental to meet air quality targets.
- 11.5.12 The London Borough of Croydon requested further work on the extension of the tram network.

### ***TfL response***

- 11.5.13 We are committed to reducing emissions across London by encouraging a shift towards public transport. This will be explored as part of the development of the Mayor's new transport and environment strategies, which are intended to be taken forward for consultation this spring.
- 11.5.14 London Borough of Croydon is currently exploring potential extensions of the tram network from Croydon town centre. We are assisting London Borough of Croydon with this work. If the current study recommends further consideration of tram extensions, we will review the findings and consider whether the extensions are likely to be affordable, deliverable, value for money and acceptable to local residents and other road users. This will inform whether any extensions should be considered further.

### ***Ultra Low Emission vehicles***

- 11.5.15 The following 22 stakeholders commented on alternative and supporting policies relating to Ultra Low Emission vehicles: Better Bankside, BVRLA, Camden Town Unlimited, CBI, CEMEX, ClientEarth, DAF Trucks, Ealing Transition Initiative, Global Action Plan, London Borough of Hackney, London Borough of Havering, London Borough of Waltham Forest, London First, London Sustainability Exchange, The London Taxi Company (LTC), Motorcycle Action Group, Private Hire Board, SMMT, Stephen Knight (Former AM), Uber, UPS and Volvo.
- 11.5.16 The following 12 stakeholders support the shift to electric: Better Bankside, Ealing Transition Initiative, Global Action Plan, London Borough of Hackney, London First, London Sustainability Exchange, LTC, Private Hire Board, SMMT, Uber, UPS and Volvo. and

- 11.5.17 Of public and business respondents, 246 called for more infrastructure for Electric vehicles.
- 11.5.18 The London Sustainability Exchange, London Borough of Waltham Forest, LTC, Private Hire Board, Uber, UPS, and CBI call for TfL to improve London's electric charging infrastructure to encourage the uptake of electric vehicles.
- 11.5.19 Stephen Knight (Former AM) recommends increasing the number of parking spaces for electric vehicles in new developments as part of the London Plan.
- 11.5.20 The CBI also stated that more hydrogen refuelling stations are required to increase the uptake of low emission vehicles.

***TfL response***

- 11.5.21 We support the uptake of electric vehicles and other ultra low emission vehicles (ULEVs). A shift to electric vehicles is necessary to reduce the impact of road transport on air pollution and climate change.
- 11.5.22 We want to encourage and enable a switch to ULEVs wherever a journey has to be taken by a motorised vehicle. In July 2015, we published An Ultra Low Emission Vehicle Delivery Plan for London<sup>19</sup> which sets out 15 actions needed to overcome London's specific barriers to ULEV uptake. We are working with the boroughs, the GLA and other stakeholders to implement this plan, including on a number of actions to improve London's electric vehicle charging infrastructure to enable more drivers to switch from fossil fuels to electric vehicles.
- 11.5.23 TfL, GLA and the boroughs are working together to invest in new charging infrastructure to support a major expansion in electric vehicles. Using £13m of government funding from the Go Ultra Low Cities scheme, we will deliver much-needed new charge points for residents, commercial users and car clubs by 2020. This scheme will also create new Neighbourhoods of the Future, which will promote innovative charging infrastructures, and policies and initiatives to support the switch to electric vehicles across different fleets.
- 11.5.24 Working with the private sector, we will also deliver 150 rapid charge points by the end of 2018 to support high mileage users, such as the freight, taxi and private hire industries, to switch to electric vehicles. The first rapid charge points will be available in summer 2017.

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<sup>19</sup> <https://tfl.gov.uk/corporate/about-tfl/improving-air-quality>

- 11.5.25 We are working with the GLA to develop new policies for the Mayor's London Plan to ensure that, where appropriate, new developments provide suitable EV charging infrastructure to support the future uptake of these vehicles.

### ***Pedestrians***

- 11.5.26 The following 12 stakeholders commented on alternative and supporting policies relating to pedestrians: Greenpeace, Living Streets, London Borough of Barking and Dagenham, London Borough of Hackney, London Borough of Haringey, London Borough of Waltham Forest, London Cycling Campaign, London First, London TravelWatch, Sustrans, Team London Bridge and Urban Partners.
- 11.5.27 Of the public and business respondents, 327 made comments in support of improving pedestrian environments, including pedestrianisation and wider pavements. This represents approximately two per cent of all respondents.
- 11.5.28 The following 10 stakeholders believe that improving pedestrian infrastructure would help to promote active travel, and improve overall air quality: Greenpeace, Living Streets, London Borough of Hackney, London Borough of Waltham Forest, London Cycling Campaign, London First, London TravelWatch, Sustrans, Team London Bridge and Urban Partners.
- 11.5.29 Urban Partners would like us to promote healthier walking routes which avoid unhealthy, more polluted streets.

### ***TfL response***

- 11.5.30 Our Healthy Streets initiative will make London a more attractive place to walk by delivering improvements to the TfL Road Network (TLRN) and providing funding for borough-led improvements on local streets. We also promote walking through Legible London, the Walk London Network, and engagement with schools and businesses.
- 11.5.31 We provide funding to boroughs to deliver improvements to local streets as part of their Local Implementation Plans. The Healthy Routes initiative will encourage investment in walking routes to schools and other local destinations, making streets safer, more accessible and more attractive places to walk.

### ***Idling***

- 11.5.32 The following three stakeholders commented on alternative and supporting policies relating to idling: Climate Change Centre Reading, Merton Conservatives Council Group and The Air We Breathe.
- 11.5.33 Of the public and business respondents, 251 made comments in support of a ban on idling, which represents approximately two per cent of all respondents.

- 11.5.34 The Merton Conservatives Council Group stated that action should be taken on idling.
- 11.5.35 The Climate Change Centre Reading suggested using traffic regulations to prohibit unnecessary idling.
- 11.5.36 The Air We Breathe called for fines for idling vehicles.

***TfL response***

- 11.5.37 Engine idling is currently a traffic offence under the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002. We have made representations to the Government that the penalty for idling should be higher and brought in line with that of other traffic offences.
- 11.5.38 We promote action on idling through bus driver training, taxi marshals and anti-idling toolkits produced through the Fleet Operator Recognition Scheme.
- 11.5.39 During periods of high pollution, we utilise roadside variable messaging signs to advise drivers to switch off engines when stationary.
- 11.5.40 Through the Mayors Air Quality Fund, we support Vehicle Idling Action, which is a London-wide behaviour change campaign across 11 boroughs and the City of London.

***Freight***

- 11.5.41 The following eight stakeholders commented on alternative and supporting policies relating to freight: BYD UK, Camden Town Unlimited, CBI, Friends of the Earth, GMB, London Assembly Conservative Group, London Bus Museum) and Team London Bridge.
- 11.5.42 Fifty-two comments on freight consolidation were received from public and business respondents.
- 11.5.43 BYD UK suggested imposing penalties on commercial vehicles with combustion engines.
- 11.5.44 The Camden Town Unlimited, CBI, London Bus Museum, Friends of the Earth and Team London Bridge stated that TfL and the government should work together to reduce vehicle movements, including freight consolidation and the retiming and shared delivery of goods. The London Assembly Conservative Group recommended introducing local freight consolidation plans.
- 11.5.45 The GMB suggested a ban on HGV movements during peak hours.
- 11.5.46 CEMEX have also called for TfL to work with manufacturers on vehicle specifications so that policies are aligned with vehicle availability.

### ***TfL response***

- 11.5.47 We recognise there could be significant benefits from a reduction in daytime goods vehicle activity, particularly in the morning peak period. Reducing freight in this period could lead to a significant reduction in congestion, safety risk and air pollution. However, this must be balanced against the operational and regulatory constraints, such as the London Lorry Control scheme and planning conditions, facing freight operators and their customers that may restrict their ability to undertake servicing and deliveries in London during quieter times of the day.
- 11.5.48 As part of the current freight programme, we are working with a range of partners in industry and a number of London boroughs through an 'out-of-hours consortium' to better understand how deliveries can be retimed to quieter periods of the day. This has included a series of research trials to investigate noise-reducing technology and working practices, how local timing restrictions imposed by local authority planning conditions can be overcome and whether changes to delivery practices can be sustained in the longer term.
- 11.5.49 We are currently working with stakeholders to develop a new freight strategy for London. This will consider the evidence currently available and the work needed to implement policy around retimed deliveries, as well as the costs and benefits of doing so. Additional regulatory measures could possibly form part of the recommendations, if other measures do not achieve the required benefits. These measures could help to reduce freight emissions and congestion.
- 11.5.50 There are a number of different consolidation techniques that can be utilised to reduce deliveries. We are undertaking research into the citywide consolidation operating models that could be feasible for London. At the same time, we are delivering a number of small scale practical projects to test different consolidation techniques. This work will enable us to make recommendations regarding the most effective techniques that could be implemented in London and help us to identify barriers to the adoption of consolidation.
- 11.5.51 Three years ago, we began engagement with the freight industry and its clients on the principles of using direct vision to improve HGV safety. This engagement is particularly important as the Mayor has also signalled he wants to examine expanding and speeding up the introduction of the ULEZ for HGVs. With both of these proposed changes, some freight operators are likely to need to modernise their fleet to address safety and emissions. TfL and the Mayor will work to ensure the implications of both schemes are communicated to freight operators, to ensure they only upgrade once to minimise the overall cost.
- 11.5.52 We are dedicated to encouraging the uptake of low emission freight vehicles through improving vehicle choice, availability and servicing by working with manufacturers and operators, and through the LoCITY programme.

## **Buses**

- 11.5.53 The following 17 stakeholders commented on alternative and supporting policies relating to buses: BYD UK, GMB, London Borough of Barking and Dagenham, London Borough of Croydon, London Borough of Ealing, London Borough of Haringey, London Borough of Havering, London Borough of Hounslow, London Borough of Lewisham, London Borough of Redbridge, London Borough of Richmond upon Thames, London Bus Museum, London TravelWatch, Merton Conservatives Council Group, Royal Borough of Greenwich, The Clapham Society and Volvo.
- 11.5.54 Of the public and business respondents, 425 made comments relating to the support of low emission buses which represents approximately three per cent of all respondents.
- 11.5.55 The following 10 stakeholders supported the uptake of low emission buses and the introduction of Low Emission Bus Zones: BYD UK, London Borough of Croydon, London Borough of Ealing, London Borough of Haringey, London Borough of Havering, London Borough of Hounslow, London Bus Museum, London TravelWatch, Merton Conservatives Council Group and The Clapham Society.
- 11.5.56 The Merton Conservatives Council Group would like a faster uptake of hybrid, electric and hydrogen buses.
- 11.5.57 The London Borough of Redbridge would like Low Emission Bus Zones to be implemented a year earlier.
- 11.5.58 BYD UK believes that TfL emissions standards for buses do not go far enough and that all single and double-decker buses entering London should be zero emission.
- 11.5.59 The London Borough of Haringey, London Borough of Croydon and London Borough of Ealing believe that Low Emission Bus Zones should be extended to some of the boroughs' busiest roads.

## **TfL response**

- 11.5.60 To support the ULEZ, all double-decker buses operating in the Congestion Charging zone will be hybrid electric vehicles and all single-decker buses in the zone will emit nothing from their engine exhaust (ie they will be full electric or hydrogen models). This means our fleet will account for only 13 per cent of road transport emissions in central London by 2020, compared with 35 per cent in 2013.
- 11.5.61 We will ensure all of our buses in central London are compliant with the ULEZ Euro VI emissions standard in 2019, ahead of its currently planned introduction (ie 2020), and that our double-decker buses operating in the area will be hybrid. We are also expanding an innovative Euro VI bus retrofit programme to over 4,000 vehicles by 2020 (up from 800) and to

5,200 by 2021. Our ambition is to purchase only hybrid or zero emission double-decker buses from 2018.

- 11.5.62 On 6 January 2017, the Mayor announced plans for 10 more Low Emission Bus Zones, deploying the cleanest buses on the Capital's most polluted routes to cut harmful NO<sub>x</sub> emissions. This is in addition to the two zones already announced at Putney High Street and between Brixton and Streatham that will be implemented in March and October 2017 respectively. All the zones will be delivered by 2020.
- 11.5.63 The zones, which are all outside the ULEZ, are expected to reduce NO<sub>x</sub> emissions from buses along the routes by around 80 per cent. Air quality hotspots have been targeted where people are exposed to some of the highest levels of NO<sub>2</sub> pollution and where older buses contribute significantly to road transport emissions. The benefits of operating the cleanest buses will be felt across the whole city as they travel on to other areas along the full length of their routes.
- 11.5.64 The Low Emission Bus Zones will use a combination of hybrid and clean buses that meet Euro VI standards. These buses are part of an improvement programme for 3,000 buses outside central London. They will also utilise a number of bus priority schemes that ensure buses are able to keep moving, cutting idling emissions and speeding up journey times for passengers.

### ***Taxis and PHVs***

- 11.5.65 The following 12 stakeholders commented on alternative and supporting policies relating to taxis and PHVs: BYD UK, GMB, Greenpeace, London Assembly Conservative Group, Licensed Taxi Drivers' Association (LTDA), London Borough of Barking and Dagenham, The London Taxi Company (LTC), Merton Conservatives Council Group, Seb Dance MEP, The Clapham Society, UKLPG and Unite the Union.
- 11.5.66 Of the public and business respondents, 366 made comments relating to the support of low emission taxis and PHVs, which represents two per cent of all respondents.
- 11.5.67 The Merton Conservatives Council Group, The Clapham Society, BYD UK, London Borough of Barking and Dagenham, UKLPG, LTC and Unite the Union supported the uptake of low emission taxis and PHVs.
- 11.5.68 The Merton Conservatives Council Group and Seb Dance MEP believe that action should be taken to reduce taxi and PHV emissions in outer London.
- 11.5.69 BYD UK, LTC and LTDA called for TfL to provide dedicated charging facilities for taxis. They also want PHV drivers to have the same emissions standard as taxis in 2018.
- 11.5.70 GMB, Greenpeace and LTDA also called for TfL to restrict the number of PHVs entering London.

11.5.71 Calor Gas, Autogas, London Assembly Conservative Group and UKLPG also called for further support to convert London taxis to use liquefied petroleum gas (LPG). However, LTC were concerned this policy would be short-sighted, leading to higher costs and emissions in the medium term as well as safety risks.

***TfL response***

11.5.72 The Mayor published his Taxi and Private Hire Action Plan in September 2016. This outlined a number of actions to ensure the markets for licensed taxi drivers and private hire drivers are fair, including steps to reinforce the two-tier system between taxi and private hire services. These measures are currently being taken forward by the Mayor and TfL in cooperation with trade and industry representatives.

11.5.73 The plan recognises the current significant contribution to air pollution from taxis and includes a number of steps to establish the Capital's fleet as the greenest in the world. Most importantly, it includes a number of initiatives to support the requirement that all new taxis licensed from 1 January 2018 will need to be zero emission capable<sup>20</sup>.

11.5.74 We confirmed similar emissions requirements for newly licensed PHVs as part of an extensive consultation undertaken by the previous mayor in 2015. A Euro 6 requirement will be introduced from 1 January 2018, leading to the phased introduction of a zero emission capable (ZEC) requirement from 2020 for newly manufactured vehicles and 2023 for all newly licensed vehicles<sup>21</sup>. Taking into account the difference in maximum vehicle age limits, this will mean all taxis and PHVs will be ZEC by 2033 at the latest.

11.5.75 The timescale for these licensing requirements was decided following an extensive consultation with both trades, taking into account the characteristics of each fleet with regard to vehicle availability and cost, contribution to emissions and how vehicles are used in London. Further information on the consultation and decision-making process can be found online at <https://consultations.tfl.gov.uk/environment/ulez-2/>.

11.5.76 As the law currently stands, we are legally obliged to issue a licence to any driver who meets the criteria for licensing and are unable to cap the number of PHVs in London. The power to cap PHV numbers will be of limited value unless we, along with a significant number of other concerned licensing

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<sup>20</sup> A ZEC taxi must emit up to 50g/km CO<sub>2</sub> with a minimum 30 mile zero emission range and be petrol if an internal combustion engine is used.

<sup>21</sup> A ZEC PHV can emit up to 50g/km of CO<sub>2</sub> with a minimum zero emission range of 10 miles, or up to 75g/km of CO<sub>2</sub> with a minimum 20 mile zero emission range.

authorities and trade bodies, succeed in lobbying the Government to take control of the issue of cross-border hiring. As the law currently stands, cross-border hiring means that PHVs can carry out bookings anywhere in England and Wales, provided the vehicle, driver and operator are licensed by their local licensing authority. This means that a private hire driver licensed by an authority outside of London can undertake a booking within the Capital. Instances of cross-border hiring are growing rapidly across the country, making this a national problem that needs a national solution. It therefore needs to be looked at in tandem with TfL having the ability to cap the number of licences, both of which are matters for government legislation. TfL and the Mayor continue to lobby the Government to pursue a cap on the number of PHVs and take control of cross-border hiring

- 11.5.77 We are also currently looking into the impact and feasibility of removing the Congestion Charge exemption for PHVs. The analysis of the potential impacts will be completed in early 2017 with any potential consultation launching later in 2017.

### ***Traffic reduction***

- 11.5.78 The following seven stakeholders commented on alternative and supporting policies relating to general traffic reduction: BVRLA, GMB, Licensed Private Hire Car Association, London Assembly Environment Committee, London Borough of Enfield, London Borough of Havering, London TravelWatch and Motorcycle Action Group.
- 11.5.79 Of the public and business respondents, 930 made comments on improving traffic flow, of which 257 opposed investment in cycle facilities. Fifty-nine made comments relating to reducing traffic levels in London.
- 11.5.80 The London Borough of Enfield and London Borough of Havering would like to have a better understanding of the impact that expanding the ULEZ and introducing the ES would have on traffic, especially at key interchanges and junctions. They feel it is important to enable efficient vehicle movements.
- 11.5.81 The Motorcycle Action Group, Licensed Private Hire Car Association and the BVRLA stated that improving traffic flow, such as through the retiming of traffic lights and improving road space, would help improve overall air quality. They also state that ‘improvement’ schemes that radically cut road space for vehicle movement to enhance conditions for cyclists have a highly significant adverse impact on air quality.
- 11.5.82 TfL response London Assembly Environment Committee stated that reduction of overall traffic should be a priority.

### ***TfL Response***

- 11.5.83 Our approach to the road network is informed by the need to develop the transport capacity that sustains growth while also ensuring that we have attractive streets and places, and manage the environmental and safety implications of road traffic effectively.

- 11.5.84 Around 75 per cent of traffic congestion in London can be attributed to more demand, particularly at peak times, than the road network is capable of accommodating. The remaining 25 per cent is generally due to a specific incident or event. Our approach to reducing congestion and improving air quality, therefore, not only includes measures to improve the operation of the road network, but also to change the way people, and goods, travel.
- 11.5.85 To target the immediate congestion problems facing London, the Mayor outlined a series of measures to improve reliability for all road users, and include improved communication with road users, better coordination of roadworks and the use of tools to manage congestion away from vital parts of the road network.
- 11.5.86 In the longer term, our aim is to reduce car dependency and enable more trips to be made by walking, cycling and public transport. Our Business Plan, published in December 2016, has a new Healthy Streets approach at its heart and includes investment in new bus priority measures, cycle routes and schemes to improve the public realm and pedestrian facilities, such as the Rotherhithe to Canary Wharf pedestrian and cycle bridge, and the transformation of Oxford Street. We will also invest in the most modern transport technology to ensure the efficient use of the road network.
- 11.5.87 We manage London's traffic signals – around 6,000 in total. In our role operating the TLRN, one of the outcomes we seek through the use of signals is to improve journey time reliability by keeping traffic flowing as smoothly as possible from day to day, so that customers who use the roads experience predictable journey times. Of course, we need to balance this against the wider outcomes that we are seeking both pan-London and on a location by location basis, for example by supporting walking and cycling. Smoother vehicular traffic, with less stopping, starting and idling also improves air quality by reducing emissions.

### ***Monitoring***

- 11.5.88 The following three stakeholders commented on alternative and supporting policies relating to monitoring: British Lung Foundation, Team London Bridge and Living Streets.
- 11.5.89 Of the public and business respondents, 50 public and business respondents made comments related to introducing local monitoring and displays of pollution levels.

11.5.90 Stakeholders call for continued monitoring in public areas, such as schools, to inform the assessment of air quality measures and enable additional actions such as public health alerts and health advice.

***TfL response***

11.5.91 London has one of the most comprehensive air quality monitoring networks in the world. Data from monitoring stations is available online.<sup>22</sup> It is used to corroborate the modelling results of the London Atmospheric Emissions Inventory (LAEI)<sup>23</sup> and inform Londoners of days of poor air pollution, including the new air quality alert system<sup>24</sup>.

11.5.92 The Mayor and TfL have introduced air quality alerts at bus stops, tube stations and roadsides across the Capital to notify Londoners during the worst incidents of air pollution.

11.5.93 Since 4 August 2016, air quality alerts have been displayed on: 2,500 bus countdown signs and river pier signs across London; 140 roadside dot matrix message signs on the busiest main roads into London, with instructions to switch engines off when stationary to reduce emissions; and on electronic update signs in the entrances of all 270 London Underground stations.

11.5.94 Depending on the alert level and communication channel, different information and guidance will be provided including: advising people to walk, cycle or use public transport if possible to help improve air quality; to reduce strenuous activity if experiencing symptoms of air pollution health impacts; or advising asthma sufferers and other vulnerable groups that they may need to use their reliever inhaler more often.

11.5.95 This is the first step towards London putting in place a comprehensive air pollution incident plan, which will also provide critical information to the emergency and support services, similar to the existing heatwave plan for England and the London Adverse Weather Framework. This will ensure improved coordination during the very worst air pollution incidents and that the most vulnerable Londoners are better prepared.

11.5.96 The GLA has recently established an audit programme that will identify measures to protect pupils from poor air pollution at some of London's worst polluted schools. Fifty primary schools, identified to be in areas that exceed the legal limits for NO<sub>2</sub> will be audited in order to review site-specific

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<sup>22</sup> <https://www.londonair.org.uk/LondonAir/Default.aspx>

<sup>23</sup> <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013>

<sup>24</sup> <https://www.london.gov.uk/press-releases/mayoral/air-quality-alerts-warn-londoners-about-pollution>

measures to reduce emissions and exposure to pollution at each school. There is an allocation of £250,000 to undertake the audits, with funding then available from the £1bn fund the Mayor has provided to boroughs to support local improvements as part of the Healthy Streets vision.

- 11.5.97 TfL and the GLA work continually with boroughs to ensure that the air quality monitors are appropriately maintained and located. We will consider suggestions for more monitoring outside schools and other sensitive locations as part of a general review of air quality monitoring.

### ***Other emissions sources***

- 11.5.98 The following 10 stakeholders raised a number of issues related to other emissions sources, including aviation, energy use, rail electrification and river vessels: Baroness Jenny Jones, Campaign for Better Transport (London), CBI, Doosan Babcock, Ealing Transition Initiative, Jim Fitzpatrick MP, London Assembly Environment Committee, Association of Directors of Public Health for London and the London Environment Directors' Network (joint response), London Borough of Haringey, London Borough of Richmond upon Thames and London Travelwatch.
- 11.5.99 Of public and business respondents, 507 commented on other emissions sources, of which 143 commented on non-transport emissions and 118 stated their opposition to the expansion of Heathrow.

### ***TfL response***

- 11.5.100 The Mayor and TfL are committed to reducing emissions across London. Further detail on policies and proposals to reduce emissions (from both road transport and other emission sources) will be explored as part of the development of the Mayor's new transport and environment strategies, which are intended to be taken forward for consultation this spring.
- 11.5.101 The Mayor remains opposed to the Heathrow Airport expansion, given its environmental impacts, including air pollution. At the request of the Mayor, we are currently providing advice and assistance to affected borough councils as they prepare for a joint legal challenge against the Government's decision.

### ***Other policy suggestions***

- 11.5.102 The following 40 stakeholders commented on alternative and supporting policy suggestions not stated above: BVRLA, BYD UK, CEMEX, Clean Air in London, Climate Change Centre Reading, DHL, Ealing Transition Initiative, Federation of Small Businesses, GMB, Greenpeace, , Living Streets, London Assembly Conservative Group, London Assembly Environment Committee, London Borough of Barking and Dagenham, London Borough of Ealing, London Borough of Hackney, London Borough of Havering, London Borough of Waltham Forest, London Borough of

Wandsworth, London Bus Museum, London Sustainability Exchange, Motorcycle Action Group, SMMT, Stephen Knight (Former Assembly Member), The Clapham Society, and Uber

- 11.5.103 Friends of the Earth and Baroness Jenny Jones expressed concerns over building river crossings, such as the Silvertown Tunnel. Baroness Jenny Jones stated that building the Silvertown Tunnel would increase pollution levels and believes that the scheme should be delayed until air quality monitoring can be completed on less optimistic assumptions. Twenty four public and business respondents commented on their opposition to Silvertown Tunnel, with 16 calling for more river crossings
- 11.5.104 The BVRLA, Ealing Transition Initiative, Uber and Greenpeace have suggested reducing car ownership through ride sharing and car pooling. 107 comments from public and business respondents were received on this topic
- 11.5.105 The London Borough of Hackney calls for a clear roadmap to set out the types of vehicles that are affected with a clear commitment to progressively strengthening emissions standards within a reasonable timescale.
- 11.5.106 ClientEarth and BYD ask for TfL and the Mayor to look at the feasibility of introducing a zero emission zone in the Congestion Charge zone.
- 11.5.107 The London Assembly Conservative Group recommended an extension of the London Boiler Cashback Scheme.
- 11.5.108 TfL response London Borough of Havering raised issues related to specific air pollution hotspots in their borough.
- 11.5.109 Clean Air in London requested that London should review the congestion charge discounts and exemptions and sign up to the UN sustainable development goals.
- 11.5.110 DHL suggested that access to bus lanes for freight vehicles should be considered.
- 11.5.111 GMB pro drivers union offered a range of suggestions including mandating the use of synthetic fuels, and smaller buses in the off peak.
- 11.5.112 London Borough of Wandsworth requested further action to reduce the traffic and air pollution impact of roadworks.
- 11.5.113 London Borough of Barking and Dagenham requested additional Low Emission Neighbourhoods. Two public and business respondents commented on this.
- 11.5.114 London Borough of Waltham Forest requested more action to reduce air pollution exposure around schools. Thirty public and business respondents requested stricter controls around schools and hospitals.

- 11.5.115 London Sustainability Exchange suggested more consideration should be given to planning and design of developments and additional behaviour change programmes around air quality.
- 11.5.116 Climate Change Centre Reading suggested a monthly car free work day.
- 11.5.117 FSB called for a new demand management system to replace existing and proposed charging.
- 11.5.118 Motorcycle Action Group stated that use of motorcycles should be encouraged to cut pollution and congestion, with 159 public and business respondents commenting on this.

### ***TFL Response***

- 11.5.119 We are committed to reducing emissions across London. Further detail on these alternative measures, as well as detail on policies and proposals to reduce emissions (from both road transport and other emission sources) will be explored as part of the development of the Mayor's new transport and environment strategies, which are intended to be taken forward for consultation this spring.
- 11.5.120 As set out in the Environmental Statement and the updates to the Air Quality assessment submitted by TfL throughout the current Development Consent Order (DCO) Examination into the Scheme, the Silvertown Tunnel results in an overall improvement in air quality at locations which are predicted to exceed the air quality strategy (AQS) Objectives in the opening year.
- 11.5.121 TfL have responded to the DCO Examining Authority on the matter of the recent high court decision requiring Defra to produce a revised air quality action plan.
- 11.5.122 The air quality assessment for the Silvertown Tunnel carried out against the AQS Objectives and reported in Chapter 6 of the Environmental Statement, already accounts for the optimism in the published emission factors.

## **11.6 Theme E: Consultation**

- 11.6.1 The following five stakeholders raised comments about the consultation itself: Alliance of British Drivers, Licensed Private Hire Car Association (LPHCA), London Borough of Islington, Motorcycle Action Group and Team London Bridge.
- 11.6.2 Of the public and business respondents, 241 commented about the consultation, including that it was confusingly worded or criticised the data used.
- 11.6.3 The Alliance of British Drivers stated that the consultation was fraudulent as not enough data on the ULEZ had been provided.

- 11.6.4 The LPHCA stated that the framing of the questions and answers on the survey are not going to achieve the necessary answers or obtain the best solutions for the ULEZ.
- 11.6.5 The London Borough of Islington raised concerns about the clarity of the document, requesting further information behind the discounts and exemptions and noting that Appendix B of the Stage 2 Consultation and information document stated that the ES will apply 24 hours a day, seven days a week.
- 11.6.6 Team London Bridge stated that questions relate to very specific policies, and there is no information about those policies.

***TfL response***

- 11.6.7 Detailed information about the proposals was made available online on the TfL consultation portal ([www.tfl.gov.uk/airquality-consultation](http://www.tfl.gov.uk/airquality-consultation)). The extensive Consultation and information document could also be downloaded there.
- 11.6.8 We also responded to stakeholder requests for further information or clarification by emails, meetings and briefing sessions. This was to help stakeholders to formulate their responses to the consultation.
- 11.6.9 Although there were many closed questions on the proposals, the final question in the questionnaire was a comments box in which respondents could write any comments of their own on the proposals. Alternatively, respondents, including stakeholders, could email or write to us and, as set out in Chapter 8, more than half of stakeholders emailed us rather than used the consultation portal. There was therefore sufficient opportunity to comment outside (or in addition to) the questions in the questionnaire and to ask for further clarification.
- 11.6.10 The reference to the ES applying 24 hours a day, seven days a week in Appendix B of the Stage 2 Consultation and information document is an error. Throughout the rest of the document and in all other material published regarding the ES, it has been stated that it will only operate during Congestion Charging zone hours.
- 11.6.11 Should the Mayor wish to proceed with the changes to the ULEZ, further statutory consultation will be held on the detailed proposals, including the impacts of the proposals.

## 12. Conclusions and recommendations

### 12.1 Emissions Surcharge

- 12.1.1 We recommend that the Mayor should consider the whole of this report and other relevant information available to him, including advice from GLA officers, the contents of the Integrated Impact Assessment, the responses to the consultation, together with our considerations, particularly with relation to Chapters 6 and 9 of this report, and then consider whether further consultation, further information or the holding of some form of inquiry is necessary or appropriate prior to his decision to confirm or not confirm the VO. If the Mayor considers that no further consultation or the holding of a public inquiry is necessary or appropriate, the VO would be confirmed with the modification as described below.
- 12.1.2 The consultation indicated that there is strong support for the ES with 64 per cent of the 15,480 respondents either supporting or strongly supporting the proposals and 53 per cent supporting the proposed start date of 23 October 2017. There was slightly more opposition than support for exempting historic vehicles and stronger opposition against exempting Showman's vehicles from the ES. There was strong support for including all 9+ seater vehicles in the ES.
- 12.1.3 We have considered and responded to the issues raised in relation to the ES as outlined in Chapter 9. TfL does not consider that any of the representations received during the consultation warrant a change to the proposed ES Scheme as reflected in the ES Variation Order published at the start of the Stage 2 Consultation to commence on Monday 23 October 2017 at a level of £10 on top of the Congestion Charge for those vehicles affected by it.
- 12.1.4 We consider that our published proposals strike the correct balance in terms of reducing NO<sub>x</sub> emissions and sending a strong signal that early action on air pollution ahead of the ULEZ is needed, without placing undue burden on Londoners.
- 12.1.5 Therefore, we recommend that the Mayor confirms the VO without modification.
- 12.1.6 If the Mayor decides to confirm the VO (with the proposed modification), the changes would come into effect as follows:
- From 23 October 2017, all eligible vehicles in central London would be required to meet the ES standards in order to drive in the CCZ during charging hours without paying an additional £10 daily surcharge
  - Upon commencement of the ULEZ (currently 7 September 2020, but this date might be brought forward to 2019, subject to further statutory consultation) the ES would end for all except residents, who would continue to be subject to the ES at the 90 per cent discount

rate for the entirety of the ULEZ 'sunset period' (currently three years after the start of the ULEZ in 2020)

- Upon the expiry of the ULEZ 'sunset period' for residents, the ES would end for residents

12.1.7 We recommend that the Mayor confirms the ES VO without modification proposed above. However, the Mayor is at liberty to decide not to confirm the VO at all or to consider doing so with or without modifications if he judges that appropriate.

## **12.2 Future ULEZ consultation suggestions**

12.2.1 The consultation asked questions about suggestions for the future of the ULEZ. There was strong support for the suggestions to bring forward and expand the ULEZ, with 63 per cent 'supporting' or 'strongly supporting' the principle of introducing the ULEZ in central London in 2019 instead of 2020.

12.2.2 The suggestion to expand the ULEZ Londonwide for coaches, buses and HGVs was 'supported' or 'strongly supported' by 73 per cent of respondents with 60 per cent supporting its implementation in 2019.

12.2.3 The suggestion to expand the ULEZ up to the North and South Circular Roads for all vehicles was supported by 59 per cent of respondents, with 51 per cent supporting its implementation in 2019. With regard to the charge level for this extended area (between the Congestion Charging zone and the North and South Circular Roads), 40 per cent supported a £12.50 charge for light duty vehicles, with 23 per cent supporting a lower charge level.

12.2.4 We make no specific recommendations regarding the three consultation suggestions concerning introducing the ULEZ sooner and making it larger, other than to note that initial analysis suggests this would have the air quality benefits for London described in Chapter 3 of this report.

12.2.5 We recommend to the Mayor that, in consideration of the responses to the three suggestions above concerning the future of the ULEZ, the importance of taking effective action to urgently address London's poor air quality, and the current breach of NO<sub>2</sub> limit values, TfL undertake further development work on these matters and develop statutory proposals to be consulted on later in the year.

12.2.6 If the Mayor wishes to pursue these proposals further, we will undertake additional work to develop them into detailed statutory proposals, paying due regard to the issues raised in this consultation and set out in Chapters 6 and 10.

12.2.7 Such alterations to the ULEZ will require a number of changes to the Low Emission Zone Scheme Order, implemented by way of one or more variation orders. As noted, the public and stakeholders will therefore have a further full opportunity to be consulted on detailed proposals in due course.

This will be the Stage 3 consultation referred to in Figure 1 of this report. We will prepare consultation materials providing information about the proposals, including a full Integrated Impact Assessment, and we will analyse responses, and report to the Mayor. The Mayor will then decide whether or not to confirm the proposals, with or without modifications.