

Ultra Low Emissions Zone Consultation

Contact: Jennifer Sibley  
Direct line: 020 7934 9829  
Email: [jennifer.sibley@londoncouncils.gov.uk](mailto:jennifer.sibley@londoncouncils.gov.uk)  
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Dear Sir/Madam,

**ULTRA LOW EMISSIONS ZONE CONSULTATION – LONDON COUNCILS’ RESPONSE**

London Councils is committed to fighting for resources for London and getting the best possible deal for London’s 33 councils. Part think-tank, part lobbying organisation, and part service provider, London Councils formulates policies, organises campaigns and runs a range of services all designed to make life better for Londoners.

Our response to the ULEZ consultation sets out the Transport and Environment Committee position and the views of boroughs directly affected. Some TEC members will be making their own submissions. Our response covers the proposals for the charge, boundary, and the specific requirements for buses, private hire vehicles and taxis. London boroughs are committed to improving air quality and want to work with the Mayor to achieve this.

Yours faithfully,



Cllr Julian Bell

**Chair of the London Councils Transport and Environment Committee**

## Ultra Low Emission Zone – London Councils' Response

### Introduction

1. London Councils and the London boroughs welcome the Mayor's focus on tackling poor air quality in central London. We believe tackling air pollution is very important for the health of Londoners, and long-term economic vitality.

### The ULEZ Standards

#### *The Charge*

2. London Councils and the London boroughs support a daily charge for all non-compliant vehicles. The concept of the Congestion Charge and Low Emission Zone are already well understood by drivers in London and we are pleased that there are proposals to link the payment of these charges by individuals where appropriate.
3. We support the proposed charges, considering them to be at an appropriate level to encourage behaviour change and the replacement of non-compliant vehicles. At the same time the charge is reasonable for individuals making ad hoc trips into London and for whom replacing their vehicle is not a reasonable option. The charges are also in line with those for the Congestion Charge and Low Emission Zone.
4. We note that the charge for a large van or minibus is the same as that for a small van, car and motorcycle. Whilst noting the potential implications on small businesses, we consider there could be scope for a slight increase for this class of vehicle.
5. We want to see a longer exemption for residents living within the ULEZ, given they have no option to avoid the ULEZ. Instead of three years, we propose a five-year period.
6. We strongly support the proposal for the ULEZ to be operational 24 hours a day, all year round. We believe it is not appropriate to try to shift more polluting journeys to different times of the day, as the intention of the scheme is to reduce and limit these journeys overall.
7. We encourage TfL to introduce a scrappage scheme for owners of cars that will not meet the ULEZ standards. This will boost efforts to remove the most polluting vehicles from London's roads, whilst at the same time ensuring that owners can get a good price for their vehicles if they choose to upgrade to a less polluting vehicle.

#### *The proposed boundary*

8. We acknowledge that air quality in central London is poor; but it is not a problem exclusive to central London, and parts of inner London outside the proposed ULEZ boundaries exceed the legal limit for NO<sub>2</sub> concentrations. Some inner London boroughs would like to see the proposed ULEZ boundaries drawn wider to include parts of their borough. Whilst we acknowledge that the current infrastructure

associated with the Congestion Charge makes it relatively straightforward to implement the ULEZ in this inner London zone, we encourage TfL and the Mayor to work with those inner London boroughs that want to see the ULEZ expanded to their area.

9. We are particularly concerned about the impact of the areas immediately outside the boundaries of the ULEZ, including the Inner Ring Road. Boroughs foresee a situation where drivers seek to park their cars in these areas to avoid paying the ULEZ charge. This could see an increase in congestion, pressure on parking, and increased poor air quality in these areas as drivers search for parking spaces. The benefits of the ULEZ could be displaced by worsening air quality outside the zone.
10. In addition, we would have welcomed cost modelling from TfL to demonstrate the costs of installing charging infrastructure for a ULEZ on a wider scale than the current Congestion Charge zone. This would have provided a better basis for dismissing a wider area as a possibility. It is also worth stating that establishing and extending the Low Emission Zone and Congestion Charge were bold projects that have been able to demonstrate their worth. We are therefore unclear about why TfL now lacks the ambition to make the ULEZ equally valuable to London.

### **TfL Buses in the ULEZ**

11. We are disappointed that TfL does not propose a more ambitious target for its buses. We support the proposal that all buses operating within the ULEZ will either meet Euro VI and be hybrid (double decker) or zero emission (single decker), as these are in line with the standards required of other bus and coach operators in the ULEZ. However we would like to see greater commitment from TfL to increase the numbers of its buses meeting these requirements not only operating within the ULEZ but across London, to spread the benefits of better air quality on a voluntary basis beyond the ULEZ. We believe this should be built into TfL's bus procurement programme now, for all buses. This will also enable TfL to respond more quickly to any strengthening of the ULEZ proposals in 2025 (see further comments on this at paragraph 20).
12. We are concerned that the 300 New Routemaster buses will continue to operate in the ULEZ without modification from 2020, without paying the ULEZ charge. It is preferable for the buses to be modified, but accepting the reasoning from TfL about this cost-effectiveness, if the buses do not meet the ULEZ requirements they must pay the daily charge. Failure to do so creates double-standards for other bus and coach operators across London.

### **Taxis and private hire vehicle requirements**

#### *Taxis*

13. We support the proposals for all newly licensed taxis to be zero emissions capable and have a maximum age limit of 15 years. We believe this use of the licensing

regime will be an effective way to encourage the switch to less polluting vehicles. However, we expect to see an increase in the numbers of vehicles submitted for licensing in the period before the new requirements in 2018. TfL should plan for this, and how it can dissuade operators from this behaviour. More information about future, stronger requirements may help here.

14. We support the proposals for existing taxis to have to meet the age limit of a maximum age of 10 years from 7 September 2020. We believe this is a welcome move to improve the emission quality of the taxi fleet in London. However, we would support further measures to incentivise further low emissions taxi vehicles, such as requirements to conform to Euro 6 standards, like private cars, or pay the ULEZ daily charge.
15. We support the requirements for taxis to apply Londonwide, as this will bring public health benefits to communities in a wider area than central London.
16. We support TfL's proposal to create a fund to support taxi owners to switch to less polluting vehicles. We encourage TfL to also introduce a scrappage scheme. To avoid the need to do so again on the same scale in 2025 when TfL is proposing to strengthen the scheme, London Councils believes it would be helpful to establish now what the stronger requirements might be, so that the new vehicles purchased remain compliant.
17. We would support TfL considering other ways to incentivise the use and purchase of green vehicles, using the experience of other European cities, such as priority placement or access to taxi ranks for lower emission vehicles.

#### *Private hire vehicles (PHVs)*

18. We support the proposal that newly licensed PHVs must be zero emissions capable from 1 January 2018, or if they are second-hand, that they meet same standards for private cars (Euro 4 petrol, Euro 6/VI diesel). We believe this is equitable with the owners of private cars.
19. We are disappointed that TfL is not proposing that the requirements for PHVs apply Londonwide. Given TfL's cross-London licensing role we feel this would be relatively straightforward to implement and would spread the benefits of the ULEZ on a wider scale, without the costs of the Automatic Number Plate Recognition charging infrastructure.

#### **The future of the scheme**

20. London Councils would support the strengthening of the requirements in future to require zero emission capability for vehicles. This must be an achievable standard for vehicles in whatever timescales are proposed. If this is likely to be TfL's stronger requirement, it would be helpful to promote this now, as owners seeking to purchase

new vehicles to meet the ULEZ standards can therefore avoid purchasing new vehicles twice. This will serve to further improve air quality even sooner.

21. In light of this, we are particularly concerned that TfL includes in its timescales the possibility of strengthening the ULEZ scheme in 2025, just five years after it will become operational. If this is to happen, we believe TfL needs to consider now what its stronger requirements will be, and communicate these to the public, taxi operators and commercial vehicle operators. Given much of TfL Supplementary Information paper discusses the challenges of introducing a ULEZ without disproportionately affecting taxi drivers, bus procurement, and small businesses, we believe that changing the parameters of acceptable vehicles just five years into the scheme is unhelpful, especially for people and companies that have just purchased new vehicles. Communicating the future stronger requirements now will enable purchasers to make informed decisions and potentially purchase a vehicle that will meet the strengthened 2025 standards, as well as the 2020 standards. This will also boost the low emission vehicle industry and accelerate the design and production of compliant vehicles.
22. We also want to see TfL build in a review and evaluation stage into the ULEZ proposals. Rigorous evaluation of the scheme after three years should be considered, together with on-going evaluation from the scheme's commencement. This should include the costs of the scheme, compliance and enforcement, and whether the scheme is having the desired impact on NO<sub>x</sub> emissions.

#### **Additional comments**

23. We seek assurances from TfL that any surplus from the ULEZ charges will be ring fenced and used for measures that improve air quality standards in London, for example investment in electric buses, electric charging points or sustainable surface transport.
24. The ULEZ alone will not solve London's air quality problems, not least for the areas outside the zone. Whilst acknowledging the Transport Emissions Road Map and funding schemes for boroughs to deliver local air quality improvements, we strongly encourage the Mayor to continue to prioritise air quality improvements, establish ways to reduce air pollution levels to below the legal limit, and work with boroughs to ensure the benefits of the ULEZ are felt across London.