

TfL consultation on changes to the London Ultra Low Emission Zone and Low Emission Zone (phase 3b) ~ Response from Campaign for Better Transport

February 2018

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to respond to the Mayor's latest Ultra Low Emission Zone (ULEZ) consultation as part of a wider set of proposals for cleaning up London's air pollution.

Part 1. Proposals for a stronger Low Emission Zone (LEZ)

1. We strongly support the proposal to introduce tougher emissions standards for heavy vehicles in the Low Emission Zone, requiring HGVs to meet the Euro VI emissions standards London-wide.

Encouraging fewer HGV movements will bring multiple benefits to Londoners. Rail is 20 times safer than HGVs according to the Office on Road and Rail; HGVs are over 6 times more likely to be involved in fatal collisions than cars on minor roads and city streets. Larger HGVs are 160,000 times more damaging to road surfaces than the average car.

We support the vision in the Mayor's draft Transport Strategy to prioritise space-efficient modes of transport in particular the aspiration to make greater use of the rail network for freight. Rail freight produces 76 per cent less carbon dioxide and up to fifteen times less nitrogen oxide emissions and 90 per cent less small particulate matter than the equivalent road journey.

2. We would like to see the standards introduced at the earliest opportunity. London's air pollution crisis requires action on the fastest possible timescale. We therefore oppose the proposed implementation date of 26 October 2020 and believe this should be sooner.

Earlier implementation can be supported by the provision of rail freight interchanges, such as those approved recently at Howbury Park (Bexley) and Cricklewood, and local consolidation centres. Such centres can provide a boost to the local economy while cutting the number of HGVs on London's roads.

3. We support the proposed charges for vehicles that do not meet the required standards.

We support the "polluter pays" principle. We believe the charges should be set at a level to incentivise compliance and should be kept under review accordingly.

Part 2. Proposals for an expanded Ultra Low Emission Zone (ULEZ)

4. We strongly support the principle of expanding the area where ULEZ emissions standards apply to light vehicles beyond central London.

Londoners in every part of the city deserve clean air. Some of the areas where the highest pollution levels have been recorded, for example A4206 Harrow Road, A1261 Aspen Way, Putney High Street or Brixton Road, lie outside the central zone. Restricting polluting vehicles from a wider area will also have knock-on benefits to areas outside the zone, as it will encourage use of alternative, cleaner modes for whole journeys.

5. We would prefer to see the whole of London included in the ULEZ.

We are prepared to support the proposal that the ULEZ emissions standards would initially apply to the inner London area (up to the North and South Circular roads) as a practical staging post to a London-wide ULEZ.

6. We would like to see the standards introduced at the earliest opportunity. London's air pollution crisis requires action on the fastest possible timescale. We therefore oppose the proposed implementation date of the expanded ULEZ of 25 October 2021 and believe this should be sooner.

National requirements for clean air compliance by 2020 (and London by 2025) are wholly inadequate to address this public health crisis, and would mean that children born today would have started school before they have air that is fit to breathe.

Research by IPPR & Kings College has shown that London must dramatically reduce, or ideally eliminate, diesel vehicles from the capital's streets in order to achieve legally compliant air quality.¹ Implementing the ULEZ as soon as feasible is a vital step.

Earlier implementation can be supported by the continued rollout of high quality green buses using bus priority lanes, dedicated cycle routes and accessible tube and rail services. We support the vision in the Mayor's draft Transport Strategy of creating liveable places with healthy streets and proposals to address car dependency, with the goal of having 80 per cent of Londoners' trips made on foot, by cycle or using public transport. Early implementation of an expanded ULEZ will help move London in the right direction.

7. We support the proposed charges for vehicles that do not meet the required standards.

We support the "polluter pays" principle. We believe the charges should be set at a level to incentivise compliance and should be kept under review accordingly.

Part 3. Proposals for residents

8. We support bringing forward the end of the sunset period for residents in the Central London Congestion Charging zone.

We believe that all Londoners are part of a shared community: we each have the same rights to breathe clean air and the shared responsibility to play our part in delivering clean air. Polluting vehicles are no less polluting if driven by residents as opposed to visitors, and delivering cleaner air requires action on all diesel vehicles.

The Central London Congestion Charging Zone has now been in place for years, and we support ending the sunset period at the earliest opportunity.

However, we recognise that to make earlier implementation of the expanded ULEZ feasible, a longer sunset period for residents newly included in the expanded area may be necessary.

We would like to see the Mayor and TfL to use this period to maximise information to the motorists affected on the many alternative options available, such as enhanced active travel and public transport options, or car club membership, rather than simply purchasing a newer vehicle.

Part 4. Proposals for penalty charges

9. We support the proposed increase in charges for vehicles that do not meet the required standards.

¹ "Lethal & illegal: London's air pollution crisis" IPPR 2016

We support the “polluter pays” principle. We believe the charges should be set at a level to incentivise compliance and should be kept under review accordingly.

Part 5: Other comments

10. We have the following additional comments:

We welcome the aspiration in the Mayor’s Transport Strategy that London’s entire transport system should be zero emission, but feel the timescales are unambitious (all taxis and private hire vehicles to be zero emissions capable by 2033, all buses to be zero emission by 2037, all new road vehicles driven in London to be zero emission by 2040, and for London’s entire transport system to be zero emission by 2050). London’s air pollution crisis requires action on much faster timescale.

We strongly welcome the recent announcement that all TfL buses will comply with the ULEZ, and that all new double deck buses delivered from 2018 will be hybrid or zero emission. The announcement of a bus retrofit programme is particularly welcome, with the aim of having a Euro VI standard fleet by 2020; recent research from Greener Journeys showed that Euro VI diesel buses produce 95 per cent fewer emissions than previous models and that bus retrofitting is excellent value for money with an approximate cost of £12 per kg NOx saved.²

We support measures to extend pedestrianisation to London’s high streets, including Oxford Street, and local centres, along with improved networks of walking and cycling routes between local centres and across central London. This must be co-ordinated with bus route planning and design to deliver an integrated public transport system that complements active travel options and provides Londoners will real alternatives to car dependency.

We strongly welcome the policies outlined in the Mayor’s Transport Strategy that reflect this positive agenda. However we are disappointed that the plans for the Silvertown Road Tunnel are still included: by increasing traffic volumes through neighbourhoods already suffering poor air quality, this will only make a bad problem worse, and undermine the positive impact of the ULEZ. We urge the Mayor to reconsider this damaging new road scheme.

We want to see surplus ULEZ revenue reinvested in better public transport, walking and cycling routes, to give people a real alternative to using their car, and to offset the negative trend (with loss of TfL’s external revenue support from April 2018) of London public transport users subsidising the capital’s roads. We support moves to ‘pay as you drive’ road user charging, in which the ULEZ could play an important part. It would enable London to tackle both pollution and congestion in a smart and transparent way, while generating vital revenue for greener transport alternatives.

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Campaign for Better Transport

Campaign for Better Transport’s vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

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² “Improving Air Quality in Towns and Cities” Greener Journeys, 2017