

## Campaign for Better Transport

### Response to consultation on an Ultra Low Emission Zone for London

<https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone>

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#### Introduction and background

We welcome the fact that an Ultra Low Emission Zone (ULEZ) is being planned to help reduce the exceptionally high levels of air pollution in London.

The need for strong and concerted action on air pollution has recently been made more urgent by the findings last year of the European Court of Justice, which ruled that governments in the UK must take action to achieve levels of pollution within nitrogen dioxide limits “as soon as possible”.<sup>1</sup>

The recent report of the House of Commons Environmental Audit Committee also recommended much more action on pollution, saying in its recent report Action on Air Quality that “meeting EU standards should be the minimum requirement” and that “Low Emission Zones are one of the most powerful tools that local authorities have for controlling vehicle emissions”.<sup>2</sup>

It is very important that the Mayor of London and Transport for London are at the forefront of bringing in measures to reduce air pollution and comply with legal obligations to protect the health of Londoners from the effects of this problem.

However, we consider the plans to be nowhere near ambitious enough in seeking to reduce air pollution in London. We believe the zone should be larger to cover much more of the area of inner London affected by legal breaches of air pollution limits, that the scheme should start earlier than 2020, and that the penalties for infringement should be higher.

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<sup>1</sup> <http://www.clientearth.org/news/press-releases/eu-court-rules-uk-government-must-act-to-clean-up-deadly-air-pollution-2699>

<sup>2</sup> <http://www.publications.parliament.uk/pa/cm201415/cmselect/cmenvaud/212/21206.htm>

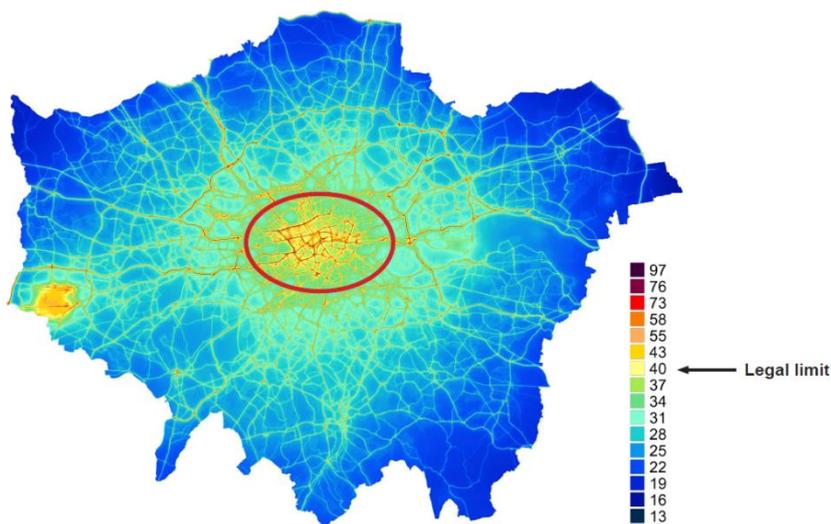
# 1. The need for a larger zone

The ULEZ needs to be extended beyond the current boundaries of the Congestion Charge zone. Several inner London boroughs have made appeals to be included and we support these calls, but would ideally want to see the new zone extend over the same area as the existing Low Emission Zone (LEZ) which covers most of Greater London.

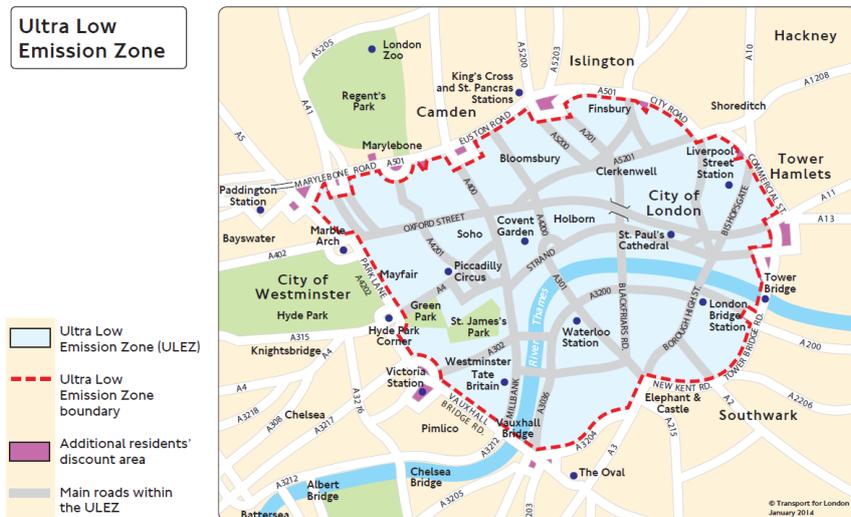
The planned area only covers 7% of the main roads that are set to be over the nitrogen dioxide (NO<sub>2</sub>) legal limit in 2020. Outside the Congestion Charge zone, it has been shown that the people most affected by pollution are likely to be those from lower income groups living close to these busy roads and the policy of only effectively protecting the centre of the city from the health effects of pollution is therefore likely to lead to greater health inequalities in the future.

We believe that extending the area, and adding the new infrastructure required to provide automated Congestion Charge-style monitoring of vehicles is entirely practicable and that its introduction would be compatible even with an earlier start date for the scheme.

## Areas with high air pollution levels in 2020 vs the planned ULEZ area:



NO<sub>2</sub> annual mean concentrations in 2020 (µg/m<sup>3</sup>)



## **2. An earlier start date**

We believe that the proposed start date for the ULEZ in 2020 is later than needed, and far too late to be considered to be 'as soon as possible', as the ECJ ruling and EU Directive states. The original deadline to achieve the legal limits set by the Directive was 2010.

The implementation of the ULEZ should be brought forward, if necessary with the addition of suitable scrappage scheme for private car drivers and/or preferential leasing scheme for taxi drivers to obtain compliant vehicles in time.

## **3. More stringent penalties, not simply a charge to bring the most polluting vehicles into the city**

The proposed charging regime does not go far enough in deterring the most polluting vehicles from entering London.

The suggested charge of just £12.50 on diesel cars and vans entering the ULEZ from 2020 onwards is likely to be seen more as a levy than as a penalty for breaching an exclusion zone, and will reduce the number of highly polluting vehicles prevented from entering the city, compared with what a higher charge could achieve.

This conclusion is backed up by the consultation documents themselves, which say of the technical analysis of the options: "In most instances, a high daily charge levied on non-compliant vehicles demonstrated a larger uptake of compliant vehicles but also a much higher proportion of journeys being deterred (ie not being made)," and calculate that under the proposed regime around 36% of non-compliant vehicle drivers would elect to 'stay and pay'.<sup>3</sup>

We therefore ask for the ULEZ charge for non-compliant vehicles to be much higher. It should be set at the level of a penalty charge in order to provide a clear incentive for vehicle owners to switch away from diesel to petrol and to low-emission electric and hybrid cars. In the technical analysis of options, this kind of regime was found to virtually eliminate 'stay and pay' drivers of non-compliant vehicles entering the zone.<sup>4</sup>

At £100, the charge level for HGVs and other large vehicles is already proposed to be higher. However, these vehicles pose not only risks to air quality but also safety issues, and so we propose raising this charge as well.

## **4. Anticipate problems with the Euro 6/VI standards**

Over a quarter of cars are now diesel, due to their lower CO<sub>2</sub> and tax rates, and they are responsible for six times more NO<sub>2</sub> emissions in London than petrol cars.<sup>5</sup> Euro standards are intended to progressively improve the emissions performance of diesel engines. However, experience with previous rounds of the Euro test shows that real-world emissions in city driving conditions do not match test-track measurements.

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<sup>3</sup> ULEZ consultation, supplementary information, pages 70 and 76 [https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user\\_uploads/ulez-supplementary-information---final-291014.pdf](https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone/user_uploads/ulez-supplementary-information---final-291014.pdf)

<sup>4</sup> Supplementary information (see ref 3), page 76

<sup>5</sup> Diesel cars are responsible for 18% of NO<sub>2</sub> emissions vs 3% for petrol cars. Supplementary information (see ref 3) page 33

It is too early to say whether changes made for Euro 6 (the proposed threshold for the ULEZ) may have overcome some of these problems and deliver the intended emissions reductions, but we believe that the Mayor and TfL should insure against their failure by rigorous testing in real-world conditions before the final introduction of the ULEZ, and that the ULEZ regime should be ready to put in higher standards, or even a full diesel engine vehicle ban, if problems are revealed.

## **5. Add traffic reduction to the policy aims, and integrate plans with the expansion of Congestion Charging**

In section 1 above, we propose extending the ULEZ zone, and one reason that we believe that the borders of the Congestion Charge Zone have been chosen is to reduce confusion amongst drivers if a number of different areas with different regulations existed.

One way around this would be to extend the boundaries of the Congestion Charge zone to match those of an expanded ULEZ. As well as being simpler to manage, the expanded zone would benefit from lower traffic, lower emissions from transport across the board, and new opportunities would be opened up for giving road space to walking and cycling, creating a virtuous cycle of policies that would be highly beneficial for the health of people in London in many ways.

While we believe that air pollution needs the most effective action possible, there is little logic in separating out mutually supportive policy measures such as traffic reduction and cutting air pollution.

The statement in the ULEZ supplementary information documents that "reducing vehicle use is not the purpose of the scheme"<sup>6</sup> is an example of this kind of 'silo thinking', and we suggest that a future review of traffic policies seeks to bring together the zones and bring in an integrated, multi-aspect charging system for vehicles entering London, aimed at reducing or eliminating all of the following:

- Air pollution
- Carbon emissions
- Road danger
- Traffic levels.

**January, 2015**

Sian Berry  
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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<sup>6</sup> Supplementary information (see ref 3), page 75