

Consultation on London Ultra Low Emission Zone (stage 3a) ~ Response from Campaign for Better Transport

June 2017

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 ULEZ consultation stage 3a as part of a wider set of proposals for cleaning up London's air pollution.

Air pollution is a public health emergency that demands urgent action. Lethal and illegal levels of air pollution are causing a health crisis in London and across the UK, causing thousands of premature deaths as well as life-limiting conditions, particularly for children exposed to pollution with homes and schools near fume-filled roads.

London is the dirty diesel capital of Europe. Its main roads break EU legal standards on pollution every year. Action is long overdue. The legal cases brought by Client Earth have added further pressure to national and local government to act. We welcome the Mayor making this vital issue an early priority.

Proposal to introduce ULEZ earlier

We strongly support the proposal to bring forward the introduction of the central London ULEZ to April 2019 from September 2020.

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.

Residents' sunset period

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.

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

Polluting vehicles are no less polluting if driven by residents as opposed to visitors, and delivering cleaner air requires action on all diesel vehicles.

However, we recognise that to make earlier implementation of the ULEZ feasible, a longer sunset period for residents 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.

Disabled Tax Class Vehicles & Blue Badge Holders

Action on air pollution will improve the quality of life for many people living with life-limiting respiratory conditions who are unable to travel with ease on high pollution days: and it will reduce the chances for many more of developing such health problems in the future.

However, we recognise the particular challenges for people with mobility problems who may be dependent on adapted vehicles, and therefore support the longer sunset period for disabled tax class vehicles.

We also support TfL's position that those Blue Badge Holders who are not already covered by the residents' sunset period, should not be exempted from the ULEZ.

However we strongly encourage TfL to work with Transport for All and other disability groups ahead of the ULEZ implementation, and to contact individual Blue Badge holders via their issuing local authorities, to advise on the range of alternative options available, including accessible public transport, low emission car clubs, and, where appropriate, dial-a-ride services.

A standard for Particulate Matter for diesel vehicles

We strongly support including a PM standard in monitoring diesel vehicle performance, as part of wider work by the Mayor of London to evaluate the real world emissions from vehicles. We strongly support stronger national and EU/international action to strengthen independent vehicle emissions testing, and support the Mayor's initiative in taking action at London level.

The growing awareness of the health effects of NOx has risked downplaying the severe impact of PMs. Yet particulate matter from engine emissions and from tyre & brake wear has been linked to a range of respiratory and cardiovascular diseases including lung cancer.

It is not only diesel vehicles that produce PMs. Braking systems from all vehicles, even those with zero emissions, are still a source: but tackling PMs from diesel vehicles is an important first step.

Other points

In the earlier ULEZ consultation, we called for a range of measures including making every bus in central London zero emission capable by 2018. 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% 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 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.

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

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 with 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 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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Bridget Fox

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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