

Response ID ANON-K85H-GTWT-6

Submitted to **New proposals to improve Air Quality - Have your say on the introduction of a new Emissions Surcharge and ideas for improving Ultra Low Emission Zone**

Submitted on 2016-12-18 18:17:31

Part 1 - Emissions Surcharge

1 To what extent do you support or oppose the introduction of a new £10 Emissions Surcharge on the Congestion Charge to discourage the use of older, more polluting vehicles in central London to improve air quality and health?

Not Answered

2 We are proposing that the Emissions Surcharge will start on 23 October 2017 as the earliest possible operational date for implementing the scheme. Do you agree with this implementation date?

Not Answered

3 Following the start of ULEZ in central London, to what extent do you support or oppose residents continuing to be liable for the Emission Surcharge, at the discounted rate of £1, during the ULEZ sunset period (for the first 3 years, while residents do not pay the ULEZ charge)?

Not Answered

4 To what extent do you support or oppose the exemption of historic tax class vehicles?

Not Answered

5 To what extent do you support or oppose the exemption of Showmans vehicles?

Not Answered

6 Do you support or oppose including L-Category vehicles (e.g. three wheeled vehicles and quadricycles) that currently pay the congestion charge?

Not Answered

7 Do you support or oppose including 9+ seater vehicles, such as coaches, buses and minibuses?

Not Answered

Part 2 - Bringing ULEZ forward to 2019

8 Do you support or oppose the idea of bringing forward the introduction of the central London ULEZ to 2019 to improve air quality and health?

Not Answered

Part 3 - Expanding ULEZ to inner London

9 Do you support the overall principle of expanding ULEZ (up to but not including) the North and South Circular roads for all vehicles?

Not Answered

10 When do you think the expansion of ULEZ (up to but not including) the North and South Circular roads for all vehicles should be introduced? Please choose the year you think would be most appropriate.

Not Answered

11 An expanded ULEZ will affect many more cars, vans and motorcycles. Do you think the daily charge for the ULEZ in inner London (between the Congestion Charge zone and the North and South Circular roads) should be the same or different to the current charge for the ULEZ in central London?

Not Answered

Part 4 - Expanding ULEZ Londonwide

12 To what extent do you support or oppose the overall principle of expanding ULEZ London-wide for heavy vehicles?

Not Answered

13 When do you think the expansion of ULEZ London-wide for heavy vehicles should be introduced? Please choose the year that you think would be the most appropriate.

Not Answered

Part 5 - Further comments

14 If you have any further comments about any of the proposals to improve air quality in London, please write these in the box below.

Comments:

The London Living Streets groups has a number of more nuanced comments that it would like to make about this consultation and apologises for not including them in the original response - ANON-K85H-GTSA-F

Apologies that these are so detailed but these are extremely important issues that go beyond the summary comments that we made in 14 in the above referenced response. We would like, therefore to include the following additional comments in our views of this consultation.

1. General Comments

London Living Streets notes that

- The GLA has published an assessment of health impacts of Particulate Matter (PM) and NO₂ as one of the most significant challenges facing the capital with the equivalent of 9,400 deaths a year attributable to air quality related illnesses, along with reduced life expectancy, reduced lung capacity and birth defects, with impacts seen disproportionately in the most vulnerable and deprived communities.
- Inner and central London have greater concentrations of NO₂ than outer London. There are 254 primary schools, 57 hospital and 84 care homes in areas exceeding NO_x limits.
- Large sections of London continue to exceed both the annual mean and legal limits for NO₂. While PM₁₀ concentrations are considered below formal legal limits in London, there are no safe limits for PM₁₀ or PM_{2.5} (smaller particulate matter) as even low concentrations have a detrimental impact on health.
- Road transport is a major source of air pollution in London. In 50 % of PM₁₀s and of NO_x emissions in London were from road transport with diesel vehicles forming a significant proportion (24%) of this. This is projected to fall to 38% by 2020 as a result of ULEZ, but only for NO_x emissions. PM₁₀ emissions will continue to rise from brake and tyre wear.
- Climate change (towards which CO₂ emissions from road transport is major contributor) is one of the biggest challenges facing UK and the world, posing environmental risks including heightened flood risk in London.
- HGVs contribute 35% of road transport NO_x and PM emissions across London. The current London Low Emission Zone (LLEZ) introduced in 2008 across most of Greater London for large commercial vehicles operates 24 hours a day every day of the year including weekends and public holidays (compared to proposed considerable reduction to Congestion Charging times only for the new ULEZ). The charge is £100-200 compared to a max of £100 proposed for the new ULEZ and only applies to PM emissions. However, as many as 99% of HGVs and 98% of large vans apparently already meet this standard, and do not pay any LEZ charges.
- Current taxis are heavy diesel vehicles and a significant contributor to poor air quality particularly in central London accounting for 15% of road transport NO_x in central London. Taxis account for 36% of emissions from pre-Euro 4 cars, diesel cars 19%.
- TfL estimates 250,000 vehicles entering inner and central London in 2019 are polluting and would not meet ULEZ standards, including 140,000 diesel cars.
- Earlier consultations showed strong support in favour of Emissions Charge and bringing ULEZ forward from the proposed 2020 rollout. In the larger Talk London poll 75% agreed London has a pollution problem, 81% agreed with the ES charge, and 79% agreed the ULEZ should be brought forward.
- Monetised health outcomes of the ES are anticipated to be £2m to £5m over 3 years. For the ULEZ this is estimated to be £7m to £30m.

We therefore welcome

- The introduction of an Emissions Surcharge (ES) from 23 October 2017 targeting older and more polluting vehicles within central London

We support the three additional proposals and urge the Mayor to go further

- Bringing forward the introduction of the Ultra Low Emission Zone (ULEZ) to 2019 rather than 2020.
- Extending ULEZ up to the North and South Circular for all vehicles by 2019.
- Extending ULEZ London-wide for heavy vehicles by 2019.

We are encouraged by the complementary measures proposed to the ES and ULEZ schemes, noting, however, that they do not go far enough.

- Low Emission Neighbourhoods Five 'Low Emission Neighbourhoods' are being set up across London with an £11 million fund from 2019. We note measures include better management of taxi ranks, an electric vehicle delivery scheme, and consolidated freight delivery, tree planting, reserving parking places for 'clean'

vehicles, no-idling zones, access restricted in some streets for 'clean cars', some car-free days in town centres, incentive schemes to encourage walking and cycling, providing green barriers between the road and pavement to reduce exposure to fumes.

We note complementarity with positive measures to introduce Liveable Neighbourhoods across London and are strongly supportive of these proposals.

- Measures to improve emission standards of TfL buses: TfL buses account for a significant 20% of all road transport NOx emissions (and 35% in central London) even though they meet and exceed Euro IV standards for NOx and PM10. New buses will be hybrid electric or full electric or hydrogen models meeting highest European standards, and will account for only 13% of road transport emissions in central London by 2020. Ambition will be to have a Euro VI retrofitting programme to buses.

We support these measures

- Investigation into a diesel scrappage scheme for all diesel cars

While we support tax exemptions for disposal of diesel cars, we do not support direct payment for replacement of diesel cars by petrol or other private motor vehicles.

- Taxis (black cabs) and Private Hire Action Plan: TfL recognises that taxis are heavy diesel vehicles that are a significant contributor to poor air quality in London, accounting for 15% of road transport NOx in central London.

New taxi and private hire vehicle licencing conditions from Jan 2018 require new taxis to be Zero Emission Capable (ZEC) from 2018 to 2023.

£27 million will be allocated as grants for buying 9,000 ZEC taxis with additional plug-in grants making a total of £67 million in grants.

In addition, there will be a scrappage scheme of £5,000 per diesel taxi from 2017, and incentives offered to current diesel taxis to convert them to LPG.

We note Private Hire Vehicles will need to meet higher Euro 6 diesel or Euro 4 petrol standards from 2018 and be ZEC from 2020.

While supportive of some level of support in the form of tax exemptions for conversion of diesel cars, we feel the level of this support is unjustifiable and hugely weighted towards private taxis which are in addition exempted from the congestion charge and future ES and ULEZ charges. We ask why equivalent financial incentives cannot be given to deliveries by non-motorised vehicles such as cargo cycles? Given the significant level of these grants why do taxis then need to be exempt from the Congestion, the Emissions Surcharge as well as the ULEZ?

- Investment of £13 million to support uptake of electric vehicles in commercial fleets and car clubs through provision of charging infrastructure. Ambition to have 10,000 vehicles by 2025 with half of these to be ULEVs by 2025.

We are disappointed by this inordinate emphasis on electric cars for private use when pollution at source and carbon di oxide emissions are not considered and congestion due to use of electric cars is not considered.

- Promotion of car clubs as alternative to private car ownership, with 1000 new charge points.

We are supportive of this initiative

- Vehicles that meet Euro 5 emission standard will have a 100% discount on Congestion Charge.

We note our reservations regarding the Euro standards later in our response.

- Investment in walking and cycling and increasing rail capacity

We are strongly in favour of these

- Devolution of VED to incentivise low emission vehicles, and to halt its ring-fencing for trunk roads outside London.

We are strongly in favour of this

3. London Living Streets Response to specific questions asked in the survey

Part 1 - Emissions Surcharge

Overall we support

- the introduction of the Emissions Surcharge
- The imposition of the ES for 9+ seat vehicles that are currently exempt for the Congestion Charge

We oppose

- Exemptions for residents
- Exemptions for taxis and private hire vehicles
- Exemptions for historic vehicles and showmans vehicles if they exceed pollution limits. There is no reason why they cannot offset pollution charges against business expenses.

However, note that we are concerned about the following:

- We note the £10 supplement to Congestion Charge will only cover older vehicles that do not meet standards, driving during limited congestion charging hours only and not during weekends and evenings when Londoners are more likely to be out on the streets socialising and shopping.
- The ES will only cover central congestion charge zone, not residential areas in inner and outer London where children live and go to school
- TfL's estimate is that the Emissions Surcharge will only apply to a small proportion of the 14,000 most polluting vehicles entering the Congestion Charging zone
 - o 26% of petrol cars and 15% of diesel cars (7,000 total)
 - o 10% of vans (2,000)
 - o 6% of HGVs and 3% non-TfL buses & coaches (1000 total)
 - o 4,000 of these polluting vehicles will qualify for discounts & exemptions and an additional 1,000 will qualify for residents' discount.
- So only 9,000 vehicles will pay the ES out of 116,700 estimated vehicles entering the congestion charging zone. This is a disappointing 8%, a small proportion of current road traffic.
- Highly polluting diesel taxis and private hire vehicles will be exempt from the ES
- We are concerned that residents in the charging area who are exempt from Congestion Charging will pay a 90% discounted Emissions Surcharge and 100% discounted ULEZ up to 2023.
- The Standard is Euro 4/IV for all vehicles, which has been widely discredited in recent road testing of vehicles.
- There is a Euro 3 standard for motorbikes but they will still be fully exempt from charges.
- £10 charge applies irrespective of size of vehicle – small petrol car or large HGVs pay the same charge
- TfL estimates the Emissions Surcharge will result in a mid-range estimate of 2% reduction in NOx from cars and 1% for PM10. For total road transport there would be a 0.5% reduction in NOx and 0.3% for PM10 across one year. TfL itself refers to this as a 'minor positive improvement in air quality, particularly in central London'.

While a step in the right direction, we feel this is not going to be a very effective measure to reduce pollution in London and far more drastic action needs to be taken at the earliest.

Part 2 - Bringing ULEZ forward to 2019

We support

- o the higher standard. It remains Euro 4 for petrol cars, but rises to Euro 6 for diesel cars, and Euro VI for vans and HGVs.
- o proposals to bring forward the ULEZ from 2020 to 2019
- o proposals to extend the ULEZ from Central London to London-wide for HGVs, buses and coaches (Euro VI) from 2019 or later
- o ULEZ coverage of more vehicles. The ULEZ would apply to 26% of current petrol cars, 86% of diesel cars, 82% of vans, 51% of HGVs and 67% of non-TfL buses or coaches – which is a significant improvement.
- o ULEZ raises the Emissions Surcharge albeit by the small amount of £2.50 to £12.50 in 2020 for cars, and a higher amount of £100 for HGVs, buses and coaches. Charges may be lower for Inner London and London-wide ULEZ.

We are concerned to note that the original ULEZ provisions which were to commence in September 2020 have been considerably watered down in the new ULEZ proposals as follows:

- A £12.50 charge for older vehicles, compared to lower £10 charge proposed now.
- Applied to motorcycles and mopeds which will now be exempted
- The original ULEZ would have operated 24 hours a day every day of the year including weekends and public holidays (compared to considerable reduction to Congestion Charging times only for the current ULEZ)
- Was predicted to halve NOx emissions in central London

We cannot see why the ULEZ needs to be watered down with operating hours and proposed levels of charges reduced, and increased exemptions introduced, given the original ULEZ has already been approved. We would ask for the original ULEZ coverage and charging to be retained.

We note

- o TfL estimates the ULEZ will lead to
 - Road transport NOx reduced by 49% in central London by 2020.
 - Proportion of people living in central London areas that exceed air quality limits will fall by 70% with ULEZ
 - London-wide ULEZ for HGVs will lead to 30% reduction in NOx emissions from road transport
 - Inner London ULEZ will lead to additional 10% reduction in NOx emissions from road transport (total of 40%)

We have reservations about the use of ULEZ to control pollution and congestion, as currently

- o only 26% of petrol cars would need to pay the ULEZ charge, so that many diesel car users could switch to petrol cars
- o Only 51% of HGVs would need to pay ULEZ
- o Over 80% of diesel cars and vans would need to pay the ULEZ so would definitely have an impact there with a strong incentive to switch to petrol driven vehicles rather than reducing driving altogether.

We therefore ask for a complete ban on diesel vehicles in London within a fixed time-frame.

We would also ask TfL to consider additional complementary and essential measures to the ES and ULEZ:

- Any revenue raised from scheme should be invested in improving the walking and cycling environment and public transport
- Further action is needed to tackle engine idling
- Reduction in motorised road traffic is essential
- Incentives for consolidated freight delivery, and deliveries by non-motorised vehicles, and centralised delivery collection points

Concern about emissions standards to be used

We note TfL's stated concerns over the performance of the Euro IV emissions standard for some diesel vehicles. These have failed to reduce NOx emissions from light duty diesel cars and vans. Even the higher Euro VI standard for heavy vehicles is not bringing as much reduction as it should.

The roll out of the new emissions standard for vehicles (Euro 6/VI) is anticipated to be more successful at reducing pollutants in urban driving conditions. However, we believe this is too optimistic a prediction.

We note that a recent analysis of diesel cars commissioned by UK, France and German governments has revealed new 'defeat systems' by motor manufacturers that help vehicles emitting high levels of toxins to pass official anti-pollution tests. These systems include:

- Volkswagen's software based device which detected when a test was under way and started suppressing emissions
- Vauxhall's 'thermal window' which only controls emissions when outside temperature exceeds 17C which is not often in UK
- 'Hot start' approach in Renault, Mercedes, Ford and Vauxhall models that results in pollution suppression systems failing to activate if engine is already warm when started.

This has resulted in 80% of cars of Euro 5 standard (London's proposed ES standard is only Euro 4) sold in 2010-14 producing three times the NOx standard when driven on the road.

The research shows the new Euro 6 standard (London's proposed ULEZ standard) diesel cars produce five times more NO2 on the road than they did in the laboratory.

This explains why cities across Europe remain polluted by NO2 even though all new vehicle models must pass emission tests that are meant to have solved the problem.

This calls into question the projected decline in NO2 emissions via the ES and ULEZ and makes it more urgent and imperative to introduce complementary measures to radically reduce private car use and completely ban diesel vehicles. This would appear to be the only way to reduce toxic levels of NOx and Particulate Matter emissions that are poisoning London's population.

Part 3 - Expanding ULEZ to inner London - No further comments

Part 4 - Expanding ULEZ Londonwide

We strongly support

o proposals to extend the ULEZ to inner London from 2019 or later. We believe charges for inner London should be less than charges for central London.

o proposals to extend the ULEZ from Central London to London-wide for HGVs, buses and coaches (Euro VI) from 2019 or later

Part 6 - About you

15 What is your name?

Name:

Jeremy Leach

16 What is your email address?

Email:

jeremyleach@posteo.net

17 Please provide us with your postcode?

Postcode:

SE17 3EQ

18 In what capacity are you responding to this consultation?

As a representative of a campaign group

Other (please specify):

19 If responding on behalf of an organisation, business or campaign group, please provide us with the name:

Organisation:

London Living Streets

20 If you have selected 'taxi or PHV' in the question above, please indicate which of the following best describes you

Not Answered

21 How did you find out about this consultation?

Not Answered

Other:

22 What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

Not Answered

Do you have any further comments?:

Part 7 - Travelling in London

23 What types of transport do you use in central London? (please tick all that apply)

Other (please specify):

24 Do you drive in the Congestion Charge Zone, if so, how often?

Not Answered

25 Do you drive within the area inside the North and South circular roads?

Not Answered