

# ULTRA LOW EMISSION ZONE CONSULTATION

## Heart of London response

28 February 2018

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Heart of London Business Alliance serves as the voice for 500 businesses and 100 property owners in the Piccadilly & St James's and Leicester Square areas. Our purpose is to support the commercial wellbeing of the businesses and organisations we represent, and ensure our areas remain integral to London's West End offer as a place for people to visit, live, trade and work.

### EXECUTIVE SUMMARY

We consider air quality and congestion to be the most significant transport challenges currently facing central London. Heart of London, alongside all the Westminster BIDs, have led on establishing freight and waste consolidation schemes which seeks to tackle these issues in their respective areas.

Overall, Heart of London is supportive of the extension of the Ultra Low Emission Zone (ULEZ) and the introduction of tougher emissions standards in central London. This is a positive step toward tackling poor air quality in the Capital. We understand the rationale for bringing forward of the 'sunset' period for residents living within the Congestion Charging Zone (CCZ) to adapt to the ULEZ, which will encourage more people to comply with the tougher emission standards sooner.

However, we remain extremely concerned that taxis are exempt from the ULEZ, significantly reducing the effectiveness of the policy. The number of taxis and private hire vehicles (PHVs) is growing at an unsustainable rate, and black cabs have a disproportionate impact on air quality. While TfL have a long-term plan to improve the environmental impact of black cabs, requiring them to comply with the ULEZ far sooner would be a welcome short-term solution to the problem of taxi emissions. There needs to be much more urgency on this matter from TfL, given the high level of regulatory control it has.

As the ULEZ will use existing congestion charge infrastructure to ensure that vehicles are compliant, it is currently unclear how an expansion of the zone outside of the CCZ would be enforced. This information should be made available as part of the consultation process.

### ULTRA LOW EMISSION ZONE

The ULEZ will launch in central London in April 2019. The original implementation date was to be September 2020, but was brought forward following a public consultation last year. Cars, motorcycles, vans, minibuses, buses, coaches and HGVs will need to meet ULEZ exhaust standards, or pay a daily charge. The ULEZ will initially cover exactly the same area as the existing congestion charge zone. As congestion charge cameras read vehicle license plates as they drive within the zone, each vehicle will be checked against a DVLA database to check if they meet standards.

Currently, residents within the ULEZ will have a three year exemption from all charges, starting from the implementation date.

This consultation by TfL is on the proposed expansion of the ULEZ beyond Central London which would mean:

- Tougher emissions standards for the existing LEZ from 2020, affecting heavy vehicles London wide.
- Expanding the ULEZ in 2021, so that emissions standards apply to the inner London area, up to, but not including, the North and South circulars.

## OUR RESPONSE

### 1. Do you support tougher vehicle emissions standards in the London-wide Low Emission Zone so that heavy vehicles must meet the Euro VI emissions standards London-wide?

Strongly support

Support

Neither support or oppose

Oppose

Strongly oppose

No Opinion

### 2. Do you support the proposed implementation date of 26 October 2020 for the introduction of tougher Euro VI standards for heavy vehicles driving in the London-wide Low Emission Zone?

Support

Oppose (should be sooner)

Oppose (should be later)

Neither

Don't know

### 3. Do you support the proposed daily charges to be paid by owners of heavy vehicles that do not meet the required emissions standards at:

- **£300 for those that do not meet Euro IV PM standards and;**
- **£100 for those that do not meet Euro VI NOx and PM standards?**

Support

Oppose (charges too high)

Oppose (charges too low)

Neither

Don't know

### 4. Do you support the principle of expanding the area where ULEZ emissions standards apply to light vehicles beyond central London?

Strongly support

Support

Neither support or oppose

Oppose

Strongly oppose

No Opinion

**5. We are proposing that the ULEZ emissions standards would apply to the inner London area, roughly up to but not including the North and South Circulars roads. Do you support this proposed boundary?**

Support

Support an expansion but area should be larger

Support an expansion but area should be smaller

Oppose expansion

Neither

Don't know

If you wish to expand on any of the answers or suggest alternative boundaries please refer to the comments section in Section 5 - Other Comments.

**6. Do you support the proposed implementation date of 25 October 2021 for the expansion of ULEZ to include light vehicles in inner London?**

Support

Oppose (should be sooner)

Oppose (should be later)

Neither

Don't know

**7. Do you support the proposed ULEZ daily charge to be paid by non-compliant owners of light vehicles of £12.50?**

Support

Oppose (the charges should be higher)

Oppose (the charges should be lower)

Neither

Don't know

**8. Do you support bringing forward the end of the sunset period for residents in the Central London Congestion Charging zone from 7 April 2022 to 24 October 2021 so that all residents of inner London, including the Congestion Charging zone, pay the daily charge for non-compliant vehicles from 25 October 2021?**

Strongly support

Support

Neither support or oppose

Oppose

Strongly oppose

No Opinion

**9. Do you support increasing the penalty charge (PCN) level for non-payment of the ULEZ daily charge by owners of non-compliant light vehicles from £130 to £160?**

Strongly support

Support

Neither support or oppose

Oppose

Strongly oppose

No Opinion

**10. If you have any further comments about the proposals, please write these in the box below.**

Overall, Heart of London is supportive of the proposals to expand the ULEZ beyond central London and introduce tougher restrictions on heavy vehicles within the existing Low Emission Zone.

**Charges**

We feel the proposed daily charges for non-compliant vehicles are acceptable and do not oppose the increase in the PCN level for non-payment of the ULEZ charge from £130 to £160. It is important that both the daily and penalty charges are periodically reviewed to ensure that they continue to act as a sufficient deterrent.

**Sunset period**

It is proposed that residents living within the expanded ULEZ will have three years from the proposed 2021 start date to ensure their vehicles are compliant.

Residents of the Congestion Charge Zone (CCZ) are currently entitled to a three-year sunset period for the ULEZ, expiring on 10 April 2022. In the interests of fairness and effective administration, it is proposed that the expiry date for the sunset period for residents living within the CCZ be bought forward by six months to align with the start date of the expanded ULEZ. This will mean that all inner London residents will have to pay a daily charge for non-compliant vehicles from October 2021.

We understand the rationale for this change, as it will eliminate any confusion and ensure that the environmental benefits of the ULEZ take effect sooner. Given the relatively short reduction in the sunset period we do not feel it will have a major adverse impact.

However, we would advocate funding for residents to retrofit their vehicles, to support and incentivise compliance with the ULEZ. Small businesses are likely to be disproportionately affected by the changes, as they may not have sufficient funds to upgrade business vehicles. We support the Mayor's call for the Government to introduce a diesel scrappage scheme.

**Taxis**

The vast majority of licensed taxis are relatively old, polluting diesel vehicles and are a significant contributor to poor air quality in London. We strongly welcome that TfL has introduced a new licensing requirement, which will mean that from 2018 all newly licensed taxis are zero emission capable. However, taxis have a 15 year age limit, meaning that it will take until 2033 for all black cabs to be capable of meeting any newly-introduced emission

requirements. There also remains a serious concern about the capacity of charging infrastructure and the financial cost of upgrading vehicles for drivers. With only 90 fast charging points dedicated to Taxis proposed to be installed this year, only a tiny proportion of cabs will be able to take advantage.

Their complete exemption from the ULEZ undermines the impact of the policy, and we would support them being subject to the charge at a far earlier date than 2033 to encourage more taxi drivers to upgrade their vehicles ahead of them reaching their 15-year limit.

TfL should do far more to encourage the development of zero emission Black Cabs, roll out charging infrastructure and provide financial incentives. We appreciate that schemes exist though greater investment and speed is necessary and we would support the Mayor in his call for greater support from central Government. The urgency at which private car drivers, freight and PHV have been asked to act to improve our city's air quality has been supported and welcomed by Heart of London. BIDs have been at the forefront of establishing freight and waste consolidation schemes and encouraging their members to make a real difference on reducing pollution.

The same urgency is now needed for matters over which the Mayor has far more direct control, such as emission from licensed taxis and buses.

### **Freight**

Heart of London, alongside all the Westminster BIDs, have led on establishing freight and waste consolidation schemes which seeks to tackle air quality issues and transport challenges.

While we welcome the ambitions of the ULEZ, freight vehicles also make a significant contribution to pollution and poor air quality. There is a need to introduce a Londonwide consolidation framework and we would welcome support for the Mayor on bringing forward the necessary infrastructure and micro-consolidation hubs to support the wider take up of these air quality positive schemes.

### **Enforcement**

As the central London ULEZ will be enforced using existing congestion charge infrastructure, it is unclear how an expansion outside central London will be enforced. We would welcome some more detail on how the expansion will work in practice.