

Committee	Dated:
Port Health and Environmental Services	15 th January 2019
Streets and Walkways Sub Committee	22 nd January 2019
Subject: Moor Lane: ultra-low emission vehicle access restriction	Public
Report of: Director of Markets and Consumer Protection	For Decision
Report author: Ruth Calderwood, Air Quality Manager	

Summary

In July 2016 the Mayor of London awarded the City of London Corporation £990,000 over three years to implement a Low Emission Neighbourhood (LEN). The funding was designed to support a range of pilot measures to improve air quality locally. One of the pilot schemes in the LEN area is to introduce an ultra-low emission vehicle (ULEV) access only restriction at the southern section of Moor Lane in April 2019.

682 people replied to an online consultation survey about the proposal. Additional responses were received via email, letter, telephone and consultation meetings with taxi representatives, Barbican residents and businesses.

Most people who responded to the consultation were against the pilot scheme. The main issues cited were:

- Increased congestion on surrounding roads
- Increased air pollution on surrounding roads
- Confusion with the Ultra-Low Emission Zone (ULEZ) also starting in April 2019. The schemes have different emission criteria.
- Lack of electric vehicle charging on-street (taxis), in residential blocks (residents) discouraging vehicle changeover
- Insufficient funds and support to purchase ULEVs
- Lack of electric freight vehicles
- Increased difficulty and cost for people with mobility issues
- Increase in journey times
- Moor Lane considered to be too small an area to pilot the proposed scheme
- Perception that the scheme is discriminatory against the taxi trade and other drivers in the area

Recommendation

It is recommended that introduction of the scheme is postponed for up to 6 months to avoid confusion with the Mayor of London Ultra-Low Emission Zone and provide additional time for drivers to upgrade vehicles.

Approval is sought:

1. from PHES Committee to purchase and install equipment before April 2019, and
2. from the S&W Sub Committee to make the experimental Traffic Management Order restricting access to ULEV only in 6 months' time

Main Report

Background

1. Air quality does not meet health-based standards in the City of London. Several measures are being implemented to improve air quality both locally and across the capital. This includes the Ultra-Low Emission Zone (ULEZ) being introduced by the Mayor of London from April 2019.
2. Despite this, it is anticipated that air quality will continue to remain an issue in the City until 2025 at the earliest. Further measures are therefore required to improve air quality in the Square Mile.
3. In July 2016 the Mayor of London awarded the City of London Corporation £990,000 over three years to implement a Low Emission Neighbourhood (LEN). The funding was designed to support a range of pilot measures to improve air quality locally. The most cost-effective measures could then be rolled out more widely.
4. One of the pilot schemes in the LEN area is to introduce an ultra-low emission vehicle (ULEV) access only restriction at the southern section of Moor Lane in April 2019.
5. A Gateway 1 and 2 project proposal was presented to Corporate Projects Board and Projects Sub (Policy and Resources) Committee in May /June 2018. This was for approval to undertake a feasibility study, consultation and awareness raising campaign. The intention was for the work to follow a light approval route, with the next report being Gateway 5 for officer approval only. Following this, work would commence to purchase and install cameras and implement the scheme by April 2019.
6. Given comments received during the consultation, and other relevant issues, it is considered prudent to agree a way forward with members of the Port Health and Environmental Services Committee and the Streets and Walkways Sub Committee.

The scheme

7. The proposed pilot scheme would restrict access to ultra-low emission vehicles only at the southern section of Moor Lane. A ULEV is a motor vehicle that emits

less than 75g of CO₂/km from the tailpipe and can operate in zero tailpipe emission mode. ULEVs range from pure electric vehicles, to some plug-in hybrids and 'range extended' electric vehicles, such as the new taxi for London. They are significantly cleaner than vehicles that meet the emission standards of the Mayor of London Ultra Low Emission Zone. The traffic controls would be managed by Automatic Number Plate Recognition (ANPR) cameras.

8. The benefits of the pilot are:

- to assess the cost of enforcement
- understand how to deliver effective signage that is widely understood
- understand the effectiveness of a ULEV only street in delivering local air quality improvements
- ascertain if the scheme would be suitable to roll out to other areas of the City in support of the City's forthcoming Transport Strategy
- assess the potential of a ULEV street to act as an incentive for the uptake of zero emission capable vehicles

The consultation

9. A consultation was held from 1st Nov to 30th November. 682 people replied to an online survey. Additional responses were provided via email, letter, telephone conversations and consultation meetings with Taxi representatives, Barbican residents and businesses. A detailed summary of responses received during the consultation is provided in Appendix 1.

10. Most people who replied are against the scheme. Key issues cited:

- Increased congestion on surrounding roads
- Increased air pollution on surrounding roads
- Confusion with the Ultra-Low Emission Zone, also starting in April 2019. The schemes have different emission criteria.
- Lack of EV charging on-street (taxis), in residential blocks (residents) discouraging vehicle changeover
- Insufficient funds and support to purchase ULEVs
- Lack of EV freight-compatible technology
- Increased difficulty for people with mobility issues
- Increase in journey times
- Moor Lane is too small an area to pilot the proposed scheme
- Perception that the scheme is discriminatory against the taxi trade and other drivers in the area

11. TfL has been consulted over the modelled impact on congestion on Strategic Road Network (Aldersgate Street and Moorgate) and consider the impact to be minimal

12. The London Borough of Hackney introduced an ULEV scheme in September 2018. This is subject to a legal challenge. Non-ULEV taxis and Private Hire Vehicles have been allowed access as a result. The legal challenge is for:

- the impact on access to a hotel
- failure to carry out meaningful consultation
- aspects from consultation responses not being considered, including disabled access and crime
- impacts on air quality
- negative impacts on the reputation of a hotel

13. The Moor Lane ULEV differs from the London Borough of Hackney scheme:

- it does not prevent access to any point in Moor Lane by non ULEVs
- it is a pilot, with an experimental Traffic Management Order (TMO), which lasts a maximum 18 months. The first six month enables formal responses to be made.
- the only requirement for an experimental TMO is to provide notice of the experiment

Options

14. It is proposed that the ULEV pilot operates 7am-11pm on weekdays and that the current barrier closure is maintained overnight and at weekends. This was the favoured option in the response to the consultation.

15. Given other issues raised during the consultation, the following options have been considered

- a. **Go ahead with ULEV scheme in April 2019, as originally planned.**

As the Mayor of London ultra-low emission vehicle scheme is being introduced in April 2019 this is not recommended due to the potential confusion. The two schemes have different emissions criteria.

- b. **Go ahead in April 2019, but provide a whitelist of vehicles that would be exempt from any penalty charge e.g. residents vehicles**

The main advantage is that the pilot would go ahead as planned, whilst reflecting comments received during consultation. The proportion of residential vehicles using Moor Lane is low. A whitelist of residents' vehicles could lead to residential support with ongoing air quality initiatives and further traffic management measures. The main disadvantages are that there could still be confusion with the ULEZ and the provision of a whitelist of vehicles would lead to a substantial increase in the time and cost of enforcement.

- c. **Postpone for defined time e.g. 6 months.**

The main advantage would be to avoid confusion with the Ultra-Low Emission Zone being introduced in April 2019. It would also allow for longer time period to publicise the scheme and additional time for drivers to move over to ULEVs. The main disadvantage is that the pilot scheme would be delayed.

d. Postpone for a longer period to assess the market for ULEV availability

The advantage of this would be to avoid confusion with the ULEZ and allow additional time for drivers to source vehicles that meet the ULEV criteria. This would be particularly beneficial for businesses that lease vehicles and are tied into a contract. It would also increase the likelihood of a high compliance rate with increased provision of electric charge points to support ULEVs in London. The main disadvantage is that the funding from the Low Emission Neighbourhood project would not be available to purchase and install enforcement cameras. The funding would have to be found elsewhere.

Corporate & Strategic Implications

16. This work supports the following outcomes from the new Corporate Plan 2018 to 2023. Outcome 11 'We have clean air, land and water and a thriving and sustainable natural environment'; Outcome 2 'People enjoy good health and wellbeing'.

Conclusion

17. The City Corporation has been piloting a range of measures to improve local air quality as part of the Low Emission Neighbourhood. This includes a proposal to implement an ultra-low emission vehicle access only restriction in the southern section of Moor Lane.

18. Overall, most people who responded to the consultation were against the scheme.

19. It is recommended that the introduction of the scheme is postponed for up to 6 months to reflect some of the comments received, and approval be granted from PHES Committee to purchase and install equipment before April 2019, and from the S&W Sub Committee to make the Experimental Traffic Order restricting access to ULEV only in 6 months' time

Appendices

Appendix 1: Summary of consultation responses

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Air Quality Manager

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Appendix 1: Summary of consultation responses

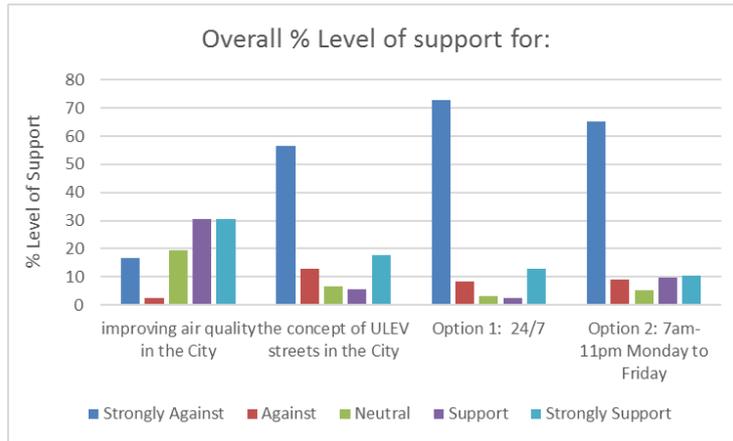
Held 1st Nov to 30th November. 682 responses were received to the online survey, with additional responses given via email, letter, telephone conversations and consultation meetings with Taxi representatives, Barbican Residents and Businesses.

Summary of online survey response:

- Breakdown of responses
 - 26% residents
 - 22% Taxi / PHV drivers
 - 15% Businesses
 - 7.5% Other drivers
 - The remaining 29% identified themselves in a variety of categories, including commuters, visitors, City workers and cyclists

- Understanding of the term 'Ultra Low Emission Vehicle'
 - 42% correctly defined ULEV as 'Vehicles which emit less than 75g of CO₂ per kilometre travelled'
 - 29% defined ULEV as 'electric vehicles only'
 - 22% incorrectly defined ULEV as inclusive of 'Euro 6 petrol/diesel vehicles'
 - 7% responders gave a range of answers, the most prominent being 2.5% who thought ULEV definition should include all taxis

- Additional information:
 - 64% own of fully petrol/diesel vehicle
 - 5% own a ULEV compliant vehicle, with a further 5% not sure if their vehicle is ULEV compliant
 - 26% don't own/drive a vehicle in London
 - 59% drive through the southern end of Moor Lane in both directions
 - 9% generally only drive north through the police checkpoint, while 3% generally only drive south through the police checkpoint
 - 5% of drivers on Moor Lane don't use the southern end at all
 - 24% don't drive through Moor Lane at all
 - Residents most strongly support the ULEV pilot



377 out of 682 survey responders also commented on the proposal. Comments received are detailed below

Comments provided online
<p>Regarding vehicle type:</p> <ul style="list-style-type: none"> - Be selective in banning certain vehicles (e.g. limit / restrict timings of delivery trucks and lorries for evenings) - Only close road closure at off peak time - average commuters (i.e. drivers) to be able to pass through from 7-9am & 5-7pm to allow passage to work - Clarify that a PHEV must be in zero emissions mode to enter the zone. A penalty equal to that received by a non-compliant vehicle should be given if the PHEV is found to be operating on its internal combustion engine (ICE) or strengthen to scheme to become a pure zero emissions zone

Regarding pilot management:

- Make it clear how the pilot will be monitored & evaluated
- Make clear the success criteria of the project
- Have precise monitoring of air pollution to determine effectiveness of the scheme
- Obtain evidence of displaced emission (and congestion, noise pollution etc) to other routes as a result of the displaced journeys
- Trial morning and evening ULEV only before going to full time
- Should only be a northbound closure
- A system of sending warning notices for first offences should be in place with penalty charge notices for repeat offenders

Other common comments

Arguments for Option 2 (keep current closures) – Preferred

- Moor Lane being open 24/7 would have a negative impact on residents. Road closure at night helps reduce noise and air pollution which impact to resident's sleep
- Option 2 (keep current road closures) reduces traffic more than option 1 (ULEV 24/7), as there is a demand for PHV/taxis at night and these will soon switch to ULEV
- Need to retain current closure to provide comparison for results

Arguments for Option 1 (24/7)

- 24/7 would provide more incentive for drivers to switch to ULEV (considering majority of traffic in Moor Lane is taxi/PHV)

There must be good communication around 'ULEV'

- Confusion with the TfL Ultra-Low Emission Zone starting in April 2019
- Confusion for visitors / irregular drivers in the area about what is allowed in a 'ULEV' only area
- Must have adequate signage on approach roads to discourage vehicles inadvertently entering Wood and Fore Streets, only to have to exit via the same route to avoid the ULEV restrictions. Very short distance to 'catch' vehicles who are not expecting the closure (this behaviour already common as drivers discover the overnight barrier on Moor Lane)
- Current proposed signage is not clear

Scheme is too small and not ambitious enough

- Commonly considered that this proposal will have no (observable) impact on AQ in Moor Lane and it is too small an area to have a wider positive impact on AQ,

especially as the road is open from the North end. Therefore another larger location or a higher area of traffic (Beech Street) should be considered

- Moor Lane is too small an area to act as a reasonable test bed for a ULEV zone
- It's a token scheme to use up money and be seen to be doing something

Traffic displacement concerns

- This scheme will create worse congestion and pollution in surrounding roads
- Will cause an increase in journey times and therefore cost (to businesses for loss of working time / to customers if taking taxi /to resident's fuel costs)
- Will increase traffic on other residential roads causing a detrimental impact to their quality of life (increase in noise and air pollution)
- Extra congestion / pollution will be caused by delivery vehicles when all of them are coming via N of Moor Lane
- Should focus on reducing no. of vehicles not changing type of vehicle or restricting access. Many roads in the City are already shut /reduced access as a result of cycle lanes/gas works etc leading to high congestion. Roads need to be flowing to reduce AQ.
- Proposal will not aid reduction in congestion efforts in the long term, and there are concerns over traffic increase as people switch to ULEV
- Negative impact on emergency service response times by closing roads

Affordability/availability of ULEV vehicles

- Most people cannot afford to replace their cars at current ULEV prices and it is unfair to expect them to
- Unreasonable to force change to ULEV now when it will happen naturally over the next few years as they become cost effective - have a gradual ULEV roll out approach
- LA / Government should subsidise cost of ULEVs
- Not enough EV's on market to cover current demand
- No EV option for HGVs - provision needs to be made if this scheme is rolled out on a wider basis
- Not a comprehensive choice of EV vehicles for taxis, the electric taxi only became available in January 2018.
- Not enough cost effective EV choice for disabled drivers/passengers

Availability of ULEV charging infrastructure

- Currently no proper infrastructure in the City
- Need charging infrastructure before start limiting vehicles to ULEV only

ULEV technology concerns

- Long term worries about EV technology and the science behind it (given Diesel gate), especially for those who purchased Diesel vehicles on Government advice
- Lack of noise made by EV's is a safety risk
- Concerns that EV's are not actually capable of their purported range

Risk to the City

- Businesses will go elsewhere if congestion continues to get worse - People/goods need the ability to move around the City in order to remain productive and most vehicles on Moor Lane are commercial/taxis and therefore needed to keep the City successful
- Perception this is just a money-making opportunity
- Could result in taxi protest demos

Thoroughness of consultation

- Not considered a proper consultation as there was no 'do nothing' option

Scheme considered discriminatory to:

- the taxi trade - it restricts making a living as a taxi driver and is a 'restraint of trade' for those whose work is dependent on travelling through Moor Lane
- Disability groups

Exemptions requested for:

- **Taxis** - Licensed taxis are 100% wheelchair accessible and are a service to the public. They are part of public transport network and can act as an emergency service. As there is already a strategy for replacing older Taxis to ULEV set by TFL, all London taxis will be electric hybrid within 15 years (discounting natural wastage which will see a faster changeover). Some responses specifically state that they will support this scheme if taxis are exempt.
- **Delivery vehicles** – there is currently no EV option for HGVs and therefore provision needs to be made for their continued movement in the area if this scheme is rolled out. Trial also needs to make provision for servicing and deliveries to Barbican Estate and local businesses.
- **Residents** - Residential access is already frequently impeded by roadworks on Fore St/Wood St, and as resident vehicle movements make up an insignificant amount of the traffic movement on Moor Lane, they should not be penalised too. This proposal also conflicts with TfL's policy of allowing residents in the Congestion Charging area to continue to receive the residents discount until 2021.

- **Emergency trade vehicles** - e.g. emergency plumbers called out by residents or local businesses

Specific response from organisations replying to the online survey:

Deutsche Bank

We own the 21 Moorfields development site, which will become the new headquarters for Deutsche Bank. We support the move towards a cleaner and healthier City and are working with our supply chain and tenants to increase the use of electric vehicles and the increased use of consolidated deliveries. The construction logistics and the long term delivery strategy for the 21 Moorfields development requires access to the site from Ropemaker Street to the North so this closure of the southern access point will not impact our site. However, a future move towards a ULEV only Moor Lane could impact our ability to service our development if the transport and logistics industry has not moved far enough towards 100% ULEV. We, as Landsec, would like to be part of the debate.

Citypoint

Implementing this scheme on Moor Lane will severely impact deliveries to Citypoint as the Loading Bay is accessed via this route only. We have already been in contact with our service supply partners regarding electric vehicles and the technology for electric trucks/lorries/delivery vans/waste trucks is not feasible at present.

Bike Taxi Ltd (Pedal Me)

Response on behalf of Bike Taxi Limited - trading as Pedal Me Moor Lane is a useful route for cycling as part of Q11. Having quieter streets is beneficial for our company as it improves the speed at which we can deliver to other businesses in the City. It also provides a safer environment for our bike taxi service. However, our concern is that a modal filter that still allows ULEV through will become less and less useful over time as more vehicles become compliant with ULEV rules. Our preference would be a modal filter that removes all motor vehicles from Moor Lane.

RAC

I am responding on behalf of RAC Motoring Services, which provides roadside assistance to members in the City of London. We have 2 points we wish to raise in relation to this proposal and the principle of an ultra-low emission street: - Access for roadside assistance vehicles operated by organisations that qualify for a congestion charge 100% discount should have access from either end of Moor Lane. Broken down vehicles cause congestion and therefore attendance times should be minimised for the safety of our members and to prevent congestion. In this instance, it does not make sense to require such vehicles to take a circuitous route to access Moor Lane from the Ropemaker Street end. - We would encourage the City of London to enforce the new ULES with a warning letter for first time offenders. City of London are unlikely to be able to afford a sufficiently high profile communications programme to ensure that all drivers are aware of the restriction and complex messages are difficult and dangerous to communicate via signage in an area as busy as the City of London. It will also be the case that the definition of an ultra-low emission vehicle may well cause confusion for drivers. We would recommend that ANPR be installed to facilitate this.

- Other methods of engagement in the consultation resulted in a further 28 emailed responses from residents and interested parties, which contained a mixture of support for and railing against the proposed ULEV scheme. The following responses from groups/organisations:

- Two consultation sessions held at the Barbican Estate resulted in the attendance of 9 people (8 residents and a representative from Land Securities). The key comments:
 - Overwhelming concern over the long-term vision for Moor Lane behind this experimental scheme e.g. will the entire Lane go ULEV only at the conclusion of the 12-18 month trial?
 - Consider the long-term visions' impacts on residents and inform each resident with a vehicle (via the carparking lists)
 - Consider the uptake issues regarding residents' financial ability to afford new ULEV vehicles
 - Proposal for resident's exemption or an 'allowed number of passes through the checkpoint'
 - Scheme may be considered discriminatory against disabled persons
 - Road signs are too loaded with information to be clear
 - Changes/roadworks etc on the wider road network will cause problems in re-routing to avoid the Southern end of Moor Lane
 - Proposal that new resident rental agreements for car parking spaces are available only for ULEV vehicles
 - One-month bedding in period is not enough to reduce confusion, especially given the elderly population on the Barbican Estate

Response to the City's Ultra Low Emission Vehicle Only Street consultation from the Barbican Association

The Barbican Association represents the 4000 or so residents of the Barbican Estate.

The BA supports the trial of a ULEV-only Street as proposed in Moor Lane. Some residents will clearly be inconvenienced by the restriction at the south end of Moor Lane to ultra low emissions vehicles only, but residents in general strongly support the move to have cleaner air and less air pollution. So we welcome this trial.

We also have a very strong preference for option 2. We understand the advantages in terms of simplicity of signage of Option 1, but it has a major disadvantage for the residents who live on Moor Lane or close to the south junction with Moor Lane. Add that to the disadvantage that the pilot will have for residents with non-compliant cars in Moor Lane and Fore Street, and Option 2 would result in severe detriment to residents.

The reason that the barrier was installed, with its closure overnight and at weekends, was to protect residential amenity and in particular residents' night time sleep. Moor Lane is overlooked by 100s of bedrooms, and against a generally quiet night-time environment, vehicle noise in the night can be very disruptive and disturbing of sleep.

The barrier provides an important protection to night-time quiet for these residents, and we do not want to see that protection diminished.

We acknowledge that the intention is that non-compliant vehicles would still not be able to come through the junction at night or at weekends. But instead of a physical barrier, option 1 would offer only the prospect of a fine to stop such vehicles. So the vehicle owner may get a fine, but that is small consolation to a resident who has been woken up in the small hours by a careless vehicle screeching round the corner.

Moreover, compliant low emission vehicles would be allowed through at any time, but their engines may not be quiet, and nor might their passengers. Disturbance can come from noise inside the car, banging doors etc.

On behalf of Barbican Residents, we hope that you will opt for Option 2 and keep the barrier closed at night.

Chair, Barbican Association

I write on behalf of the Barbican Association and the residents.

The members of the BA discussed the Moor Lane ULEV proposition at the November meeting and we understand the need for the project and are supportive of the Pilot Scheme. However, we strongly object to Option 1 in which the gate would in effect be removed at the corner of Fore Street and Moor Lane.

We are also aware of some residents who need to use their cars because of mobility issues and who will find their journeys more difficult with long detours. (Willoughby House car park to drive south for instance) They will write to you I am sure but as a group we do wonder if there is a more suitable road junction in the City that is not affecting so many residential properties.

We choose Option 2 that retains the overnight and weekend road closure, something that was hard won and does not need to be lost just because the signage may be more difficult. The gated road was debated after much consultation. The reasons for the restriction to the traffic at weekends and after 11pm were very good and road users in the area are used to it.

There are some 300 bedrooms facing Fore Street and Moor Lane, both are narrow roads and there are the 6 servicing and delivery areas - Moor Place, Moor House, London Wall Place, City Point with 21 Moorfields and Tenter House soon to be added. There are also bars and restaurants on Moor Lane and within the City Point area. Option 1 that introduces a through route will cause an increase in traffic with resulting road noise and disturbance.

I would be grateful for a confirmation from you that this comment is added to the list of responses to your consultation.

Chair BA Planning Sub-committee
Deputy Chair BA

Consultation meeting with Taxi trade representatives

- Impact of displaced traffic in the surrounding areas
- Possible increase costs of travel particularly to wheelchair users
- Impact on drivers – extra pressure from passengers
- Increased journey times
- Concerns over measurement criteria for the Pilot – there must be broader measurement of the pilots success or not then the increase in ULEV vehicles
- Favour Option 1 (scheme operates 24/7) as it is clearer and would be easier to communicate to drivers



The Licensed Taxi Drivers' Association
Taxi House
Woodfield Road
London
W9 2BA
November 2018

To whom it may concern,

LTDA Moor Lane ULEV Scheme Consultation Response

We are writing to you in response to the public consultation on the Moor Lane Ultra Low Emission Vehicle Pilot Scheme. The Licensed Taxi Drivers' Association is the professional and authoritative voice of London taxi drivers, representing over 10,500 members. We are committed to ensuring that our member's voices are heard and to maintaining the high professional standards that have become synonymous with London taxi drivers.

We fully commend in principle the City of London's commitment to improving air quality in London, by encouraging the uptake of fully electric and compliant hybrid vehicles, which will reduce CO₂ and NO_x levels. Taxi drivers are some of the worst impacted by poor air quality, as they are exposed to dangerous levels of air pollution every day whilst driving across our city. London's taxi trade is already leading the way in efforts to clean up London's air and transition to zero emission vehicles and from January 2018 all new taxis licensed in London have been Zero Emission Capable.

However, in the interim, it remains imperative that taxis are allowed maximum possible access to all roads. Mayor Sadiq Khan's planned London-wide Ultra Low Emission Zone exempts taxis in recognition of the action the trade is already taking to combat poor air. Local policies, such as the Moor Lane pilot scheme, should mirror this approach. Taxis are also relied upon by thousands of passengers of limited mobility. All black cabs are wheelchair accessible, with a subsidised 'taxicard' ride scheme operating for disabled passengers. For those who struggle with walking or cycling, accessing the area Moor Lane will be more difficult without the option of a taxi.

Most importantly, whilst we welcome clean air measures, it is more vital that the City of London focuses on delivering the electric vehicle charging infrastructure that is greatly required to encourage more to transition to ZEC vehicles, instead of restricting taxi access to

roads. Our members need to be assured that widespread accessible, affordable and dependable rapid electric charging points are in place. Currently, the nearest fast-charging point to Moor Lane is on Banner Street, EC1Y 8QE, and with only one port. This is 0.8 miles away. If similar ULEV-only schemes are to be piloted across the City of London, there needs to be the infrastructure in place to support a greater number of electric vehicles on London's roads.

To conclude, we would support the measures if they were to include an exemption to allow taxis continued access to Moor Lane.

Please do let me know if you would like to discuss the concerns we raise in any further detail, or if you have any questions. You can get in touch at your earliest convenience by contacting Toby North by e-mail (tobynorth@newingtoncomms.co.uk) or by telephone (020 7234 3338).

Yours sincerely,

Chairman of the Licensed Taxi Drivers' Association

City of London Moor Lane Ultra Low Emission Vehicle (ULEV) Pilot Consultation

November 2018

Summary of FTA View

- FTA is opposed to an Ultra-Low Emission Vehicle zone which includes HGVs and vans.
- The Association has concerns about access for commercial vehicles making deliveries to customers in the area.
- The introduction of the scheme only weeks prior to the Ultra-Low Emission Zone in Central London, and operating to different emission standards, is unhelpful for industry.
- There are no diesel vans with emissions lower than 75g CO₂/km currently available on the market, and HGVs are not measured in the same way as cars and vans for CO₂. Therefore, this is effectively an HGV ban.

Background

The Freight Transport Association (FTA) is one of Britain's largest trade associations, and uniquely provides a voice for the entirety of the UK's logistics sector. Its role, on behalf of over 17,000 members, is to enhance the safety, efficiency and sustainability of freight movement across the supply chain, regardless of transport mode. FTA members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight.

FTA's mission is to make logistics safer, cleaner and more efficient. We seek to ensure that our members can supply our towns and cities with the goods they require every day, whilst reducing any social impacts – including air pollution. As information about the health impacts of some atmospheric pollutants has grown, the issue of lowering local air quality emissions has risen in its importance. The logistics industry accepts that emissions need to reduce compared to their historic levels.

FTA response:

FTA has concerns about access for commercial vehicles making deliveries to customers in the area and therefore is opposed to an Ultra-Low Emission Vehicle zone which includes HGVs and vans.

The logistics industry recognises the importance of tackling poor air quality and has been working hard to upgrade its fleet. In London, operators are already working towards the introduction of the Ultra-Low Emission Zone in April 2019, making significant investments to upgrade their fleets to Euro VI/6 standards.

The Moor Lane Ultra Low Emission Vehicle Zone works to different emission standards and is being introduced a matter of weeks before the launch of the ULEZ, which is unhelpful for industry and does not allow sufficient time for them to make the necessary adjustments to their fleets and operations.

Whilst there is a wide range of electric cars currently on the market, the same cannot be said for commercial vehicles. Indeed, electric van supply is severely limited, as is model choice and there are currently no electric trucks on sale, neither are we expecting there to be in the short-medium term. It is far too soon to be introducing restrictive schemes such as this on commercial vehicles. Instead, operators need support such as refuelling and recharging infrastructure and financial incentives to enable them to start to switch their fleet to zero and ultra-low emission technology.

There are no diesel vans with emissions lower than 75g CO₂/km currently available on the market, and HGVs are not measured in the same way as cars and vans for CO₂ – the main measurement cited for compliance for the pilot scheme. It is also unclear what the position is for zero-emission capable vehicles.

Non-compliant vehicles will need to make longer journeys to access the area from other roads, which is likely to add to congestion in surrounding roads and increase emissions. For truck operators, this will be their only option as there are no Ultra-Low Emission Trucks (ULETs) currently on the market. The Department of Transport in their Road to Zero strategy has committed to creating a definition of a ULET and work will be shortly underway on this. FTA would urge the City to follow progress on this and to postpone the inclusion of commercial vehicles until there is a clear definition and sufficient vehicle supply.

If commercial vehicles were to be included in the scheme, it would effectively be a lorry ban or a tax on commercial vehicles wishing to supply goods and services to their customers based in the zone.

Neither of the two options offered in the consultation (24 hours a day, seven days a week, or 7am to 11pm on weekdays) are helpful to operators, given the restrictions across London that apply regarding night time deliveries.

30 November 2018

Policy Manager – Vans and Urban
Freight Transport Association

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Air Quality Team
City of London Corporation
Port Health and Public Protection
Department of Markets and Consumer Protection
Guildhall, Gresham Street
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16 November 2018

Dear Sirs,

Re: Moor Lane – ULEV Strategy Consultation Feedback on behalf of the Barbican Centre

Overall, the Barbican is extremely pleased with and supportive of the improvement strategies proposed for the 'Ultra Low Emissions Vehicle' only restrictions for Moor Lane. We believe this will make for a cleaner and safer environment for our visitors, our staff and local residents. We do however seek clarification on the wider scheme and an understanding of the alignment with other schemes that are in progress or are being considered by the City of London Corporation.

Re: Vehicular Access to the Barbican for Deliveries & Impact on Other Proposed Strategies

Whilst this current strategy is concentrating in Moor Lane access, Barbican event activities are serviced via Silk Street and Beech Street. Please can we be reassured that this will not impact further on these key highway arteries that provide access to our loading bays. Any restrictions to access these roads will impact on our ability to maintain adequate vehicular access to the Barbican, which is paramount for both our arts and commercial programmes. Without this provision the Barbican would not be able to deliver its core activities. It would impact the quality and artistic integrity of the programming at the Barbican and there would also be a negative impact in terms of revenue.

Can we also be assured that this will not adversely affect the amount of vehicle traffic that uses Silk Street, therefore increasing the risk for pedestrians using the different crossing points on Silk Street and Beech Street, which are already very busy junctions, particularly at peak times.

Yours faithfully,


Director of Buildings and Operations
Barbican Centre and Guildhall School of Music & Drama

barbican



NOBLE & ASSOCIATES

RECEIVED
15 NOV 2018

1 Fore Street
London
EC2Y 9DT
UK

9th November 2018

Mr David A H McG Smith, CBE
Director of Markets and Consumer Protection
City of London
PO Box 270
Gulldhall
London EC2P 2EJ

Dear Mr Smith,

Re: Consultation on Moor Lane Ultra Low Emission Vehicle only access proposal

Thank you for your letter of 7th November and the information leaflet giving notification of this 'pilot'. Before being able to give an informed response to the consultation (both as a Barbican resident and working nearby), I would be grateful if you could provide answers to the following questions I have:

1. You state that the aim of the pilot scheme is, "... to encourage the uptake of fully electric and compliant hybrid vehicles ...". What is the data or evidence on which this assumption has been based?
2. Given the above stated 'aim' of the trial, how will you measure the extent to which it has been achieved as you have not enquired whether or not my ULEV compliant vehicle which will be driven through the Moor Lane barrier was acquired before the trial or as a result of the trial? Do you intend to question all ULEV compliant vehicles that pass through the barrier, 'when and why' they purchased their vehicle?
3. If you DO NOT have a valid means of measuring the success of the pilot on whether or not the 'aim' has been achieved, what is the point of the pilot? Virtue signalling? PR? distraction from the substantial reduction of road space over many years which has slowed traffic and contributed to pollution?
4. If you DO have a valid means of measuring success on this basis how many people will have to have exchange their non-compliant ULEV vehicle for one that is compliant, in order for the Corporation to conclude that the aim of the pilot has been achieved? 1, 2, 50...?
5. Although 'reducing pollution' is not stated as being a specific goal of the trial (simply that it is being undertaken as 'part of the Low Emission Neighbourhood project'), I assume that it will be a failure if, rather than reducing pollution, it results in adding to pollution in and around the area of the Barbican? Please confirm whether or not this assumption is correct.
6. If it is, then please identify the location of the test equipment that you will be installing in London Wall, Fore Street, Wood Street, Silk Street, Aldersgate Street, Beech Street or other adjacent roads, that will accurately measure whether or not there is an increase in pollution during the period of the trial caused by non ULEV vehicles re-rerouting to avoid the barrier?
7. When will this equipment be installed, so that you can be sure of having valid 'before and after' data?
8. You state that '...Moor Lane has been identified as a suitable location' for this pilot scheme. Who was responsible for making this determination and what were the criteria used?

Thank you for your attention and once I have received your reply, I will be able to offer you my view on the trial.

Yours sincerely

Director

cc The Editor, City Matters

BREWERY LOGISTICS GROUP RESPONSE TO CoL MOOR LANE
PILOT

Background to Brewery Logistics Group (BLG)

The BLG is a trade assc representing the key logistics firms servicing pubs, restaurants and bars in London . We sit on a number of groups and forums in the Capital and are core members of the CLFQP

The BLG currently represents 12 members who cover over 1200 vehicle days per week in London accounting for approx. 75% of all beer deliveries within the M25

Response to the proposals outlined in the information and consultation document

The cost and availability to logistics companies has to be taken into account when reviewing anything that is involved with the vehicles being used

The Mayor has already set his aims to reduce air pollution in his Transport Strategy as follows

Clearly stating that freight must adhere to Euro 6 wef April 2019 (this has been brought forward from September 2020 when most operators were planning their new fleets)

Why has the City of London decided to use a different standard for ULEVs which are not available in any quantity?

You are using the following to set the standard for your ULEV

“The vehicle must emit less than 75g of CO₂ per kilometre travelled”

This is even harder to understand when the EU is aiming at” 95g of CO₂ per kilometre travelled”

Shouldn't the City of London take a step back and make sure it is setting standard that the Mayor wants and that the vehicle manufacturers are being guided to

Boroughs going off on their own and setting different areas of “clean air” is certainly not conducive to achieving the bottom line, as most one of schemes might have benefits in the close area involved and then it all goes pear shaped in surrounding areas leading to increased emission , more congestion ,less productivity and therefore the need for more vehicles not less

Points of concern from your document

- How is the pilot scheme going to help inform whether it is suitable for the City of London?
- By closing one end and offering alternative access don't you think that this will cause more congestion and emissions than before you put in this scheme
- Who are the advantages and disadvantages aimed at?

conclusion

This scheme should be shelved until the basis of use is cleared by TfL and a standard for all boroughs is agreed across London

Regards

Chairman BLG

The John Lewis Partnership

Response to: The City Of London Moor Lane (ULEV) Pilot

Dated 6th December 2018

The John Lewis Partnership welcomes the opportunity to respond to the proposals outlined in the City of London Ultra Low Emission Vehicle pilot.

The Partnership operate a number of stores within London for both John Lewis and Waitrose, and these require a number of both scheduled and un scheduled daily deliveries, from both the Partnership and third party vehicle fleets.

Home delivery also plays an important part in supporting these stores, with hundreds of on line orders being fulfilled through van deliveries within London on a daily basis and around the proposed area of change.

About the John Lewis Partnership

The John Lewis Partnership is the UK's largest employee-owned business, where all 84,000 Partners are co-owners. The Partnership is one of the UK's largest retailers, forming both John Lewis and Waitrose stores located throughout the UK.

The principles of the Partnership model and our written Constitution underpin how we do business and define our role in society and in the community. This includes commitments to:

- Contribute to the wellbeing of the communities where we operate
- Deal honestly with our customers and secure their loyalty and trust by providing outstanding choice, value and service
- Conduct all of our business relationships with integrity and courtesy

As a business, we work hard to reduce our overall environmental impact and in transport, are committed to distributing our goods in the most resourceful way, encouraging innovation as we do this. For example, last year, Waitrose became the first company in Europe to use lorries which are run entirely on biomethane gas generated from food waste.

Response to the proposals:

The Partnership welcomes any initiatives to improve the air quality in and around London and the uptake and use of cleaner, quieter vehicles.

Option number two: ULEV incorporating the existing road closure is considered a more acceptable proposal however there are concerns with both options 1&2, and the further proposal of a fine being levied for failure to comply.

This road closure appears to offer a limited solution, as access can be gained via other routes, does this proposal add value?

The Mayor of London in his strategy has set the Ultra Low Emission Zone using the Euro standards for both petrol and Diesel vehicles (this incorporates low emission vehicles), therefore why is the City of London proposing to set a standard at a lower level than this, (75g CO₂ per kilometre travelled , electric vehicles and some hybrids) as this standard is not yet attainable for many delivery vehicles due to manufacturing and availability restrictions.

It is very important for successful delivery and serving in London that street access is maintained, and vehicle speeds/journey times are not reduced and congestion is kept to a minimum to assist journey times whilst contributing to reducing pollution.

Conclusions:

The John Lewis Partnership fully supports the requirement to ensure the Capitals streets are safer and that vehicle emissions are reduced to acceptable levels.

Concern is expressed to the fact that the Capital has already been given a transport strategy as produced by the Mayors Office, which vehicle operators and others, are prepared to work with to help improve safety and emissions, to introduce a smaller scheme as proposed will cause confusion, and further concern is given to how effective this will be ?

The Partnership, and no doubt other fleet operators would be happy to engage with the City of London, to discuss the proposed changes within their transport strategy.

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 20,000 supporters of whom over 11,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

This response was developed with input from LCC's borough groups.

General comments on this scheme:

The scheme to restrict motor traffic to only "Ultra Low Emission Vehicles" (ULEVs) on the southern end of Moor Lane is opposed.

The small size of trial site is unlikely to yield meaningful results about traffic redistribution and/or evaporation, or the use of ULEVs in the City (that can't be gathered by other means) etc.

On top of that, given the high-end nature of many private hire and private motor vehicles, as well as the trajectory for new taxis and emissions, it is unlikely that even in the short to medium term excluding higher emissions cars on streets in the City will have much impact on motorised traffic levels. Other methods of restricting and reducing motor traffic, such as physical modal filters, are likely to yield far better results than this proposal.

Specific points on this scheme:

- The current proposal does not cover a significant area or even a street with significant problems.
- ULEVs do not reduce emissions or pollutions to zero – such vehicles simply shift emissions from the highway to the point of power generation, and the evidence is that use of braking systems, tyres and other moving motor vehicle systems are a significant source of dangerous particulate pollution even when there are no fuel-derived emissions. ULEVs also do not reduce congestion, or increase activity levels in themselves. As such, while schemes such as this could encourage shift from heavily-polluting vehicles to cleaner ones, they are not likely to encourage or enable mode shift to healthier and more sustainable forms of transport, such as walking, cycling and public transport. In other words, a street used heavily by ULEVs will be no better for cycling and little better for walking than a street used heavily by motor vehicles with higher emissions.
- This is particularly likely to be true in the City where private car use is low, and where many private cars are at the higher end of the market, including those used by private hire vehicles. Given this, introducing ULEV-only streets and zones in the City is very unlikely to significantly reduce motor vehicle traffic.
- For these reasons, enabling more sustainable modes, including for deliveries, servicing, construction etc., is more important than cutting out higher emission motor vehicles from individual streets or areas. And providing and enabling genuine alternatives to driving for as many journeys as possible will be increasingly vital to keep the City moving. It is important then to ensure the overall transport strategy does not end up favouring and/or incentivising ULEVs above more sustainable and active forms of travel.

- For the many reasons listed in the above points, a pilot of a full-time, permanent modal filter here, instead of a ULEV section of street, would be of greater use than this proposal.
- Given the physical filtering of Moor Lane at certain hours at present offers a far more useful facility for those cycling (and walking) by restricting all motor traffic, retaining the existing “road closure” in Option 2 is a preferred option. In either case, concerns about signage being “complex and less easy to understand” in Option 2 seem unrealistic, as outside of ULEV pilot operational hours, there will be a physical barrier stopping motor vehicles accessing the space.

General points about infrastructure schemes:

- LCC requires infrastructure schemes to be designed to accommodate growth in cycling. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use, walking, cycling, then public transport are key.
- As demonstrated by the success of recent Cycle Superhighways and mini-Holland projects etc., people cycle when they feel safe. For cycling to become mainstream, a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic is required to/from all key destinations and residential areas in an area. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset.
- Spending money on cycling infrastructure has been shown to dramatically boost health outcomes in an area. Spending on cycling schemes outranks all other transport modes for return on investment according to a DfT study. Schemes which promote cycling meet TfL’s “Healthy Streets” checklist. A healthy street is one where people choose to cycle.
- All schemes should be designed to enable people of all ages and abilities to cycle, including disabled people.
- LCC wants, as a condition of funding, all highway development designed to London Cycling Design Standards (LCDS), with a Cycling Level of Service (CLOS) rating of 70 or above, with all “critical issues” eliminated.

London Cycling Campaign

www.lcc.org.uk