

Consultation on the Ultra Low Emission Zone

The City of London Corporation (City Corporation) strongly supports the principle of an Ultra Low Emission Zone (ULEZ) for Central London and feels that it is a vital step towards improving air quality in the capital. However, the impact on air pollution in the Square Mile is not sufficiently clear from the consultation documents to enable us to determine whether we support the scheme outlined.

Air pollution can have a real impact on public health. It has been estimated that over 4,000 Londoners have their lives cut short each year due to exposure to London's air. Diesel exhaust has been classified as a carcinogen by the World Health Organisation. The proposed ULEZ will go some way towards addressing this problem but the City Corporation feels that:

- The proposals are focused on NO_x reduction and do not pay sufficient regard to PM₁₀/ PM_{2.5}, which is more of a health concern.
- The proposal does not do enough to encourage alternatives to diesel vehicles, particularly cars and small vans, which the City Corporation considers to be a missed opportunity.
- The Euro VI NO_x emission limit for diesel vehicles is unlikely to meet the required emission reduction and this may mean that the scheme is not sufficiently robust to address air pollution in central London.

The City Corporation strongly supports the proposal for a 10 year age limit for taxis and for newly licenced taxis to be zero emission capable from 2018. We also support the proposed standards for petrol vehicles, the residents' discount, the hours of operation and area to be covered.

The proposed area

The City Corporation supports the proposals for the zone to cover the existing Congestion Charge Zone. Consideration should be given to extending the geographic area if the scheme is proved to be effective in reducing concentrations of nitrogen dioxide sufficiently.

Hours of operation

The City Corporation strongly supports the proposal for the zone to be in operation 24 hours a day, 365 days of the year in order to be effective.

Daily Charge

The daily charge for non-compliant vehicles is set at a reasonable level for most vehicle types; however it should increase annually in line with inflation. The charge will enable drivers that make very infrequent trips into the zone to continue to do so without having to change their vehicle, or travel around the zone thus potentially creating more pollution.

Consideration should be given for increasing the daily charge for commercial vans from £12.50 to encourage compliance rather than payment which could be absorbed by the business in a similar way to the existing Congestion Charge.

Residents' discount

It is appropriate to allow residents within the zone an additional 3 years beyond 2020 to comply with the requirements of the zone. At the end of the 3 year period, if the scheme has not been as effective as anticipated, TfL should reassess the scope of the ULEZ, rather than requiring residents to upgrade automatically. It is important that proper analysis is undertaken on monitoring results as soon as possible following the implementation of the scheme to assess the effectiveness of the ULEZ.

Vehicle standards

Given the relatively low levels of NOx and PM10 emitted by petrol vehicles, the City Corporation considers Euro 4 to be an appropriate standard for these vehicles. Similarly Euro 3 for motorcycles appears to be appropriate.

Regarding the standards for diesel vehicles, there are still concerns relating to real world emissions of Euro 6 / VI. A 2013 report by Dutch consultancy TNO 'Investigations and real world emission performance of Euro 6 light duty vehicles' reveals that NOx emissions for Euro 6 vehicles are on average 500mg/km during real world driving conditions rather than the required 80mg/km . This is over six times greater. Similarly, a 2014 study by the International Council on Clean Transportation on Real World Exhaust Emissions from Modern Diesel Cars, revealed that the average, on-road emission levels of NOx from Euro 6 vehicles was 7 times that required. **Consequently, the City Corporation questions the principle of requiring Euro VI / 6 diesel vehicles when it appears that Euro VI / 6 technology does not deliver the required emission reduction.** It would be useful to know the emission factors that were used for diesel vehicles for calculating the anticipated reduction in concentrations of nitrogen dioxide. As Paris is considering a ban on diesel cars from 2020, this should also be considered for the central zone of London. Overall, the consultation documents do not appear to give sufficient consideration to alternatives to diesel vehicles.

It is noted that there will be a high rate of vehicle compliance by 2020 (i.e. Euro 6 / VI vehicles) without the implementation of the ULEZ, for example 77% of HGVs, 67% of coaches. The City Corporation questions whether this high rate of pre-compliance makes the scheme cost-beneficial.

London buses

Whilst it is acknowledged that Transport for London has an ongoing programme to make London buses cleaner, the City Corporation considers that TfL should do more to pursue options for non-diesel double decker buses in the central zone. This is due to the large proportion of NOx emitted by TfL buses and the miles travelled by these

vehicles. The proposal details that some Euro V hybrid buses will continue to operate in the zone beyond 2020; the City Corporation would question the fairness of this proposal given that coach and HGV companies will be expected to use Euro VI vehicles from 2020 in the zone.

Taxis

The City Corporation strongly supports the 10 year age limit from 2020 for taxis as they are responsible for a relatively large proportion of emissions of air pollutants in the central zone. This is due to the age of the vehicles and number of miles travelled. The City Corporation also supports the proposals for newly licenced taxis to be zero emission capable from 2018 and we are pleased to see that these are likely to be petrol based hybrids. It is essential that a taxi scrappage scheme is introduced along-side the requirement to have a zero emission capable vehicle to enable taxi drivers to upgrade. Taxi drivers will also need to be confident that the new zero emission capable vehicles are reliable.

Private Hire Vehicles (PHVs)

The City Corporation considers that it should be mandatory for all newly manufactured PHVs that are presented for licensing from 2018 to be petrol based zero emission capable, rather than diesel, as this will have extra benefits for air quality. Given the availability of these vehicles this could be introduced before 2018 and would be a very visible demonstration of the Mayor and the GLA's determination to deal with air pollution.

Impact of the ULEZ on air quality

The impact of the proposed scheme on air quality in the Square Mile is unclear. The data has been represented as a receptor weighted change in annual average concentrations of NO₂. Table 7-E of the Environmental Assessment states that the receptor weighted change in annual average NO₂ for the City Corporation will be 5.9µg/m³. Given that some residents in the Square Mile live on a road with an annual average nitrogen dioxide level of approximately 120 µg/m³, this change in concentrations appears to be small. The City Corporation notes that figure 7-J of the same Environmental Assessment suggests that the reduction in concentrations is expected to be 42µg/m³.

Unfortunately the data does not enable us to see how far the proposed ULEZ is expected to take us towards compliance with the annual average and hourly average NO₂ limit values. This information would have been useful to assess the likely cost effectiveness of the scheme.