

**Town Clerk & Chief Executive**  
John Barradell OBE FRGS FRSA



Date 16 December 2016

Dear Mayor

### **Consultation Response: New Proposals to Improve Air Quality**

Thank you for the opportunity to comment on the new proposals to improve air quality outlined in the consultation document dated October 2016. The response to the consultation questions are detailed below

- 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?**

The City Corporation supports the principle of an Emission Surcharge, but this particular proposal appears to lead to very little improvement in air quality. The consultation document itself forecasts that this policy will have a 'minor positive' improvement in air quality in the Congestion Charge Zone, delivering a 3% reduction in NOx emissions from road transport. This is likely to lead to a very small reduction in actual annual average nitrogen dioxide concentrations, perhaps less than  $1\mu\text{g}/\text{m}^3$ .

Given the minor impact on air quality, the City Corporation would like taxis and PHVs to be included in the scheme, and not be exempt from the Emissions Surcharge. In addition, the residents discount does not provide sufficient incentive for residents to replace their vehicles for a cleaner one or to use alternative transport. Consideration should be given to a sliding scale of charges over the course of the 'sunset' period.

The scheme has the potential to lead to a marginal reduction in traffic, which the City Corporation would support. However, as the documentation states this is difficult to determine. The City Corporation does appreciate that the Emission Surcharge would largely be a transitional scheme, ahead of the ultra-low emission zone, which will have a much greater impact on air quality. The Emission Surcharge could also lead to a positive impact on the way London is perceived as a 'clean city'.

The consultation document states that, at a macro level, the financial burden of the emission surcharge isn't expected to cause any material negative impact on London's

business. However some SMEs and also individuals that need to drive into the zone for work may be affected. The document states that retrofit may be an option for these vehicles. Further details should be made available on this as soon as possible.

- 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?**

The 23 October 2017 would seem reasonable for an appropriate Emission Surcharge scheme, providing sufficient time is given to drivers to retrofit vehicles if they wish. We are confident that Transport for London will have the necessary certification system in place by the implementation date.

- 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)?**

The residents discount does not provide sufficient incentive for residents to replace their vehicles for a cleaner one, or to use alternative forms of transport. Consideration should be given to a sliding scale of charges over the course of the 'sunset' period.

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

The City Corporation supports the exemption of historic tax class vehicles, as they are not considered to be a key contributor to local levels of air pollution.

- 5. To what extent do you support or oppose the exemption of Showman's vehicles?**

The City Corporation supports the exemption of Showman's vehicles, as they are not considered to be a key contributor to local levels of air pollution.

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

The City Corporation supports the exemption of L-Category vehicles as they are not considered to be a key contributor to local levels of air pollution.

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

The City Corporation considers that 9+ seater vehicles should be required to meet an emission limit, or pay a charge, as it is an 'Emission Surcharge' and not a 'Congestion Charge'.

- 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?**

The City Corporation understands that no formal proposals for alterations to the planned ultra-low emission zone (ULEZ) are being put forward in this consultation document. Further detail about the proposals will follow in 2017, subject to additional feasibility work. The consultation document does state that if the ULEZ was introduced in 2019, it is anticipated that there would be a 40% reduction in NOx emissions from transport, on top of that which would be achieved by introducing the ULEZ in 2020. Consequently, the City Corporation supports the proposal to bring the date forward in principle, and would like to see further details in the next consultation phase on the actual impact on air quality and the corresponding impact on health. The City Corporation would also welcome details in the next phase of the consultation of any financial support to assist people and small organisations to comply with the ULEZ requirements, together with details of options to retrofit.

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

The City Corporation understands that no formal proposals for alterations to the boundary of the planned ultra-low emission zone are being put forward in this consultation. Further details will follow in 2017, subject to additional feasibility work. Consequently, the City Corporation would like to reserve judgment on the proposed boundary until further information becomes available.

In the next phase of the consultation, the City Corporation would like details of the anticipated impact on actual levels of air pollution in central London from an expanded ULEZ. The City Corporation would also like to see details of any financial support to assist people and small organisations to comply with the ULEZ requirements, together with vehicle retrofit options.

**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.**

The City Corporation feels unable to comment on this until further details are provided in the next stage of the consultation.

**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?**

The City Corporation feels unable to comment on this until further details are provided in the next stage of the consultation.

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

Given the emission profile of Euro IV HGVs, the City Corporation supports the expansion of the ULEZ for HGVs, or the upgrade of the existing London Low Emission Zone. Due to the cost of new HGV vehicles, an appropriate certified retrofit system should be in place in advance of implementation. In light of the large reduction in NOx achieved by fitting selective catalytic reduction to London buses, it is likely that a similar system could be very effective for reducing emissions of NOx from HGVs.

**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.**

The City Corporation feels unable to support any specific date until further details are provided in the next stage of the consultation.

#### **Additional comments**

The City Corporation would welcome further incentives for the transition of diesel taxis to zero emission capable taxis from 2018. There would be large air quality benefits in central London if all taxis were zero emission capable by 2025.

The City Corporation would also like to see additional measures to remove diesel private hire vehicles from the PHV fleet in the shortest possible time. The City Corporation considers that no new diesel PHVs should be licenced from 2017 and existing licences for diesel PHVs should be phased out by 2020. Again, these are some of the vehicles that travel the most distance in central London and alternatives to diesel are readily available. Consequently, there are large benefits to be gained by targeting these for emission reduction. The City Corporation would also like to see a cap on the total number of PHV licences issued from 2017.

The City Corporation welcomes proposals for bringing forward the requirement for all double decker buses to be ULEZ compliant in central London from 2020 to 2019. The retrofit of 5000 buses across London to meet Euro VI standard by 2021 is also welcome.

*Yasmin*

