

London Forum of Amenity and Civic Societies

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Transport for London Consultation on changes to the Ultra-Low Emission Zone and Low Emission Zone

This is a response from the London Forum of Amenity and Civic Societies to TfL's consultation on this subject dated 30 November 2017. The London Forum represents about 130 amenity and civic societies across London.

For the most part, we strongly welcome the proposals for changes to both the Ultra Low Emission Zone (ULEZ) and the Low Emission Zone (LEZ).

However we have two significant reservations, as outlined below, both of which we have reflected in responses to previous consultations.

- 1) We think it is wrong that the ULEZ should cover only the area inside the North and South Circular Roads. This would mean that substantial parts of London where there is significant air pollution would be outside the ULEZ. This particularly applies to South London, since the South Circular Road is mostly closer to central London than is the North Circular Road. In addition it means that the area around Heathrow, where pollution is particularly bad, would not be included.
- 2) We also think it wrong that no distinction is made between different categories of cars and other light vehicles built to the Euro 6 standard. The EU Commission reiterated its position in August 2017 that the Euro 6 limit would be tightened further in two stages, so as better to reflect real world driving conditions, rather than, as now, merely laboratory conditions. The first stage of tightening will come into force by September 2019 for all new vehicles; the second stage, with further tightening, by January 2021. So by the time the ULEZ would be extended, under TfL's proposals, beyond central London (October 2021), the first stage of tightening for new vehicles would have already been in force for over two years, and the second stage would have just come into force. Yet the proposals as they stand do not provide any incentive for drivers to switch away from diesel vehicles which were built to a standard which does not reflect real world driving conditions. A commitment made now by the Mayor that the real world driving Euro 6 standards will apply to the ULEZ as soon as possible will provide a valuable advance incentive for drivers to buy lower emission vehicles in future.

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In our view the Mayor should make a commitment now:

- a) to extend the coverage of the ULEZ beyond the North and South Circular Roads, so as to cover the whole of London, within the shortest possible time after the proposed extension up to those roads;
- b) to require light diesel vehicles built to the existing (non-real world) Euro 6 standard to pay a ULEZ charge within the shortest possible time after the introduction of the ULEZ; and that, as soon as possible after that date, the only diesel light vehicles which would be exempt from the ULEZ charge would be those which conform with the second, and more stringent, phase of tightening that will apply to new vehicles from September 2021.

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