

## **TfL consultation on Ultra Low Emission Zone**

### **Response to consultation by London Forum of Amenity and Civic Societies**

1. This response is on behalf of the London Forum of Amenity and Civic Societies, which is the coordinating body for approximately 100 local civic and amenity societies, which together have around 50,000 individual members. Some individual local societies are also likely to be commenting separately.

### **Summary of comments**

2. Overall, while we welcome the proposal, we do not believe that it goes far enough. This is mainly for the following reasons:
  - a. While the proposal will have an impact on NO<sub>2</sub> concentrations especially in central London, it will still leave many Londoners exposed to unacceptably high levels of air pollution, for both NO<sub>2</sub> and particulates, with continuing significant adverse impacts in their health and quality of life;
  - b. EU legal limits for NO<sub>2</sub> will continue to be exceeded in several parts of London even with these proposals. Consequently, given current legal action being initiated by the EU Commission and others, these proposals are unlikely to be sufficient to comply with the law.

### **More detailed comments**

3. The main cause of NO<sub>2</sub> and particulate pollution in London is diesel vehicles. Based on the analysis by Jacobs consultants provided by TfL with these proposals, these proposals will reduce pollution from NO<sub>2</sub> further than the reductions already allowed for in the baseline scenario.
4. But:
  - a) The additional impacts are not so significant outside the central area, with inner London in particular left with significant levels of pollution. Some of the most polluted roads in London will not be covered by the proposals, including the Inner Ring Road, inner suburban centres such as Putney High Street and Brixton High Road, and the area round Heathrow.
  - b) The reductions shown for pollution from particulates is shown as small. While London is just compliant with EU particulate legal limits, pollution from this source continues to have a significant adverse health impact.
  - c) The proposals as set out would not have a significant impact for about another 10 years. While the consultation does not rule out further measures going beyond what is currently proposals, these are not currently elaborated and, given the time lags already assumed, would not have an impact for appreciatively longer still.
  - d) The most recent sets of EU emission standards for diesel vehicles have failed to deliver the reductions in NO<sub>x</sub> emissions (and hence NO<sub>2</sub> concentrations) that were expected. And there is currently no evidence that more recent or suggested EU standards for even newer diesel vehicles will perform significantly better. Consequently, relying on a set of measures, as in this document, which considerably depend on diesel cars, vans and lorries moving to newer vehicles set at higher EU standards for diesel vehicles will

greatly limit the pollution reductions compared with an alternative approach of reducing the proportion of diesel vehicles on London's roads.

5. The London Forum therefore believes that additional action should be taken urgently, and within the same timescale as the current proposals, on the following lines:
  - a) The current set of proposals should apply to all inner London boroughs, as well as to areas in outer London (especially around Heathrow) that are currently subject to high levels of air pollution from vehicles; the arrangements for such extension should be based on a partnership of TfL and the individual boroughs concerned. If any individual borough wishes to introduce comparable arrangements to those currently proposed for central London, then there should be a presumption that TfL would work with the boroughs concerned to introduce comparable arrangements.
  - b) The proposals should be extended to provide for more explicit incentives for vehicle users to switch out of diesel vehicles to petrol or ultra low emission vehicles; currently this is being proposed only in relation to buses and taxis, with the emphasis there, but not elsewhere, on encouraging low emission capable vehicles. The current proposals should be therefore modified to include a significant differential charge between petrol and diesel vehicles, with petrol vehicles paying a relatively low charge and diesel vehicles a relatively high charge; boroughs should also be encouraged to introduce much more widely than at present other forms of differential charging between petrol and diesel vehicles, especially in parking charges. (To prevent business hardship, transitional arrangements may be needed to prevent the penalisation of vehicles used for deliveries where business livelihood is at stake.)