



**Caroline Russell AM**  
**City Hall**  
**The Queen's Walk**  
**LONDON SE1 2AA**

Our ref: CR-0237  
22 June 2017

Sadiq Khan  
Mayor of London  
City Hall  
The Queen's Walk  
London SE1 2AA

Dear Sadiq

**Consultation response: proposals for central London 2019 Ultra Low Emission Zone (ULEZ) and emissions standard for particulate matter.**

I am responding in my capacity as a Green Party Member of the London Assembly.

My detailed views on the current (Stage 3a<sup>i</sup>) consultation are set out overleaf. These should be considered along with my comments on your earlier ULEZ consultations (stage 1<sup>ii</sup> and 2<sup>iii</sup>).

In summary, Londoners need you to:

- Aim for all Londoners to breathe safe air within EU limits for nitrogen dioxide (NO<sub>2</sub>) by 2020 or sooner
- Consult on a London-wide Ultra Low Emission Zone (ULEZ) for all vehicles
- Base the diesel ULEZ standard on independent 'real world driving' emission tests
- Use World Health Organisation guidelines for the diesel ULEZ particulate matter standard
- Improve public transport, pedestrian and cycling provision, especially in outer London

Yours sincerely,

Caroline Russell AM



City Hall **Green** — Caroline Russell AM

[caroline.russell@london.gov.uk](mailto:caroline.russell@london.gov.uk) 020 7983 4388 @carolinerussell

**Caroline Russell's response to the current [stage 3a] consultation on changes to the central London Ultra Low Emission Zone:**

**1. Do you support the principle of the Ultra Low Emission Zone to improve air quality in London?**

I strongly support the principle of the ULEZ so that the Mayor is taking all action possible to reduce the exposure of Londoners to polluted air in the shortest time possible.

**2. To what extent do you support bringing forward the implementation of the ULEZ in central London from 7 September 2020 to 8 April 2019?**

I strongly support bringing the ULEZ implementation forward to April 2018 so that the Mayor is taking all action possible to reduce the exposure of Londoners to polluted air.

**3. Do you support keeping a three year resident's sunset period so it is from 8 April 2019 to 11 April 2022?**

No, I do not support a resident's sunset period, because this will not discourage short car journeys. Any sunset period charge must have a car-use deterrent effect.

**4. Do you support keeping the present end date of the sunset period for disabled tax class vehicles so it is from 8 April 2019 to 11 September 2023?**

Yes, I support keeping the sunset period for disabled tax class vehicles. However, the Mayor should consider financial assistance to help individual disabled drivers and organisations providing transport for disabled people to transition to vehicles that meet ULEZ emission standards. These vehicles often require substantial and expensive modification.

On a broader point, Transport for London (TfL) needs to make the public transport network far more accessible for disabled people. Giving more priority to step-free access, fixing broken down lifts quickly, and making sure the right number of suitably trained staff are available to offer assistance at stations.

**5. To what extent do you support introducing a particulate matter (PM) standard for diesel vehicles within the ULEZ standard?**

I strongly support an emission standard for diesel particulate matter 2.5 (PM). These smaller particles have a significant health impact as they penetrate deep in to people's lungs and can cross into their bloodstream. The ULEZ limits should be based on World Health Organisation guidelines<sup>iv</sup> of 10 µg/m<sup>3</sup> annual mean/ 25 µg/m<sup>3</sup> 24-hour mean<sup>v</sup>.



**6. If you have any further comments about the proposals, please write these in the box below:**

### **6.1 A London-wide Ultra Low Emission Zone (ULEZ) applying to all vehicles**

- Londoners need full compliance with air pollution limits for the whole of London, achieved as soon as possible, and by 2020 at the latest.
- All phases of the ULEZ should be implemented within this mayoral term of office. It is disappointing to see the inner London ULEZ (to north and south circular) planned for 2021.
- Londoners' health should be protected with a London-wide ULEZ applying to all vehicles across the city not stopping short at the north and south circular. No Londoners should be left out.
- The Mayor should consult Londoners on the option of a London-wide Ultra Low Emission Zone (ULEZ) for all vehicles.
- This should be integrated with a road-pricing scheme, where charges are based on the time of day, distance travelled and level of vehicle emissions to reduce car use.

### **6.2 ULEZ standards to be based on real world driving emissions tests**

- The Mayor's 'cleaner vehicles check'<sup>vi</sup> scheme will verify 'real-world driving emissions' for new vehicles. It should be the basis for setting ULEZ standards.
- If diesel manufacturers fail to reduce real world driving emissions to legal limits, the Mayor should remove exemptions for these Euro 6 diesels. This will send a clear signal to the motor trade and their customers that non-compliant vehicles will no longer be tolerated.

### **6.3 Display 'cigarette packet' style warnings of exposure to nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>2.5</sub>)**

- Consumers should have adequate information on the potential harm from more polluting vehicles before purchase. A 'cigarette packet' style warning should accompany the real world driving emissions test results for all new diesel vehicles when you publish them through your 'cleaner vehicle check' scheme.

### **6.4 Traffic reduction to be a priority**

- The best way to clean up the air is to have less traffic in the first place. Measures are needed to reduce car use and enable a rapid transition for more journeys being made on foot, by bike and by public transport especially in outer London.

---

<sup>i</sup> <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-2/>

<sup>ii</sup> <https://www.london.gov.uk/about-us/london-assembly/assembly-members/publications-caroline-russell/publication-caroline-russe-0>

<sup>iii</sup> <https://www.london.gov.uk/about-us/london-assembly/assembly-members/publications-caroline-russell/publication-caroline-russe-2>

<sup>iv</sup> World Health Organisation, Ambient (outdoor) air quality and health factsheet, updated Sept 2016 <http://www.who.int/mediacentre/factsheets/fs313/en/>

<sup>v</sup> [http://apps.who.int/iris/bitstream/10665/69477/1/WHO\\_SDE\\_PHE\\_OEH\\_06.02\\_eng.pdf](http://apps.who.int/iris/bitstream/10665/69477/1/WHO_SDE_PHE_OEH_06.02_eng.pdf)

<sup>vi</sup> <https://www.london.gov.uk/city-hall-blog/mayor-unveils-new-cleaner-vehicle-checker-scheme>

