



Ultra Low Emission Zone Integrated Impact Assessment

Transport for London

Addendum to the Integrated Impact Assessment of ULEZ Further Proposals (December 2017)

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1 Introduction

1.1 Overview

- 1.1.1 London currently operates a London-wide Low Emission Zone (LEZ) which affects heavy vehicles. Currently the LEZ requires all heavy vehicles to meet a Euro 4 Particulate Matter (PM) standard or pay a daily charge of £200.
- 1.1.2 The Mayor has now confirmed the introduction of an Ultra Low Emission Zone (ULEZ) in central London from 8 April 2019. The ULEZ will apply 24 hours a day, every day of the year. All vehicles that do not meet emissions standards will be liable to pay a daily charge to drive within the zone. The ULEZ will replace the current T-Charge.
- 1.1.3 The Mayor set out further proposals as part of the Mayor's Clean Air Action Plan announced in July 2016,. They are:
- (i).1 Stronger LEZ – the introduction of a Euro VI requirement London-wide for heavy vehicles (HGVs, buses, coaches and other specialist vehicles) from 26 October 2020 through changes to the current London-wide LEZ; and**
 - (i).2 Expanded ULEZ – the extension of the ULEZ emission requirements from central London up to, but not including, the North and South Circular Roads for light vehicles (cars, vans, minibuses and other light vehicles), from 25 October 2021 so that all vehicles entering inner London are subject to emissions controls from this date.**
- 1.1.4 The ULEZ Further Proposals underwent consultation between 30 November 2017 and 28 February 2018 (the ULEZ (as consulted)).

1.2 Integrated Impact Assessment

- 1.2.1 Transport for London (TfL) has commissioned Jacobs to undertake an Integrated Impact Assessment (IIA) of these further proposals. The IIA identifies the potential impacts of the proposals on the environment, health, equalities, and the economy and business.
- 1.2.2 TfL considered that the potential implications of the further proposals would be best understood through detailed impact assessments in relation to environment, health, equality, and economy and business, including how adverse impacts could be avoided or mitigated where possible, and how beneficial impacts could be enhanced.
- 1.2.3 The IIA report brings together the findings of each of these assessments into one integrated document, where they are reported under three themes to be consistent with the structure of the recent IIA undertaken for the Mayor's Transport Strategy. These are:
- London's environment (incorporating the Environmental Assessment)
 - London's people (incorporating the Health Impact Assessment and Equality Impact Assessment)
 - London's economy (incorporating the Economics and Business Impact Assessment)

- 1.2.4 The IIA was completed in December 2017 and is available online through TfL's ULEZ consultation: <https://consultations.tfl.gov.uk/environment/ultra-low-emission-zone>
- 1.2.5 The IIA report made a number of recommendations for TfL to use the consultation period to explore potential mitigation of likely adverse impacts arising from the Further Proposals. Following consultation on the ULEZ, and taking into account additional analysis and stakeholder engagement, TfL is proposing three changes to the ULEZ Further Proposals (as consulted).
- 1.2.6 Jacobs has undertaken an assessment of the three proposed changes and the findings of the assessment are presented in this report. This report will be appended to TfL's Consultation Report to the Mayor and should be read in conjunction with the IIA (December 2017)¹.

1.3 Structure of this report

- 1.3.1 Section 2 provides background information on the ULEZ Further Proposals (as consulted) and the proposed changes.
- 1.3.2 Sections 3, 4 and 5 provide information on the potential changes and an assessment of these changes.
- 1.3.3 Section 6 provides a summary of the assessment.
- 1.3.4 Section 7 lists the acronyms used throughout this report.

¹ Ultra Low Emission Zone – Further Proposals: Integrated Impact Assessment (December 2017) https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-3b/user_uploads/integrated-impact-assessment.pdf

2 The Ultra Low Emission Zone (ULEZ)

2.1 The ULEZ (as consulted)

2.1.1 The ULEZ Further Proposals (as consulted) comprises two proposals as set out below:

Stronger ULEZ

2.1.2 TfL is proposing to introduce a London-wide Euro VI standard for heavy vehicles (lorries, coaches, buses and other heavy specialist vehicles) from 26 October 2020. This will be introduced through a change to the emissions standards for the existing London-wide Low



Emission Zone (

2.1.3 Figure 2-1 below).

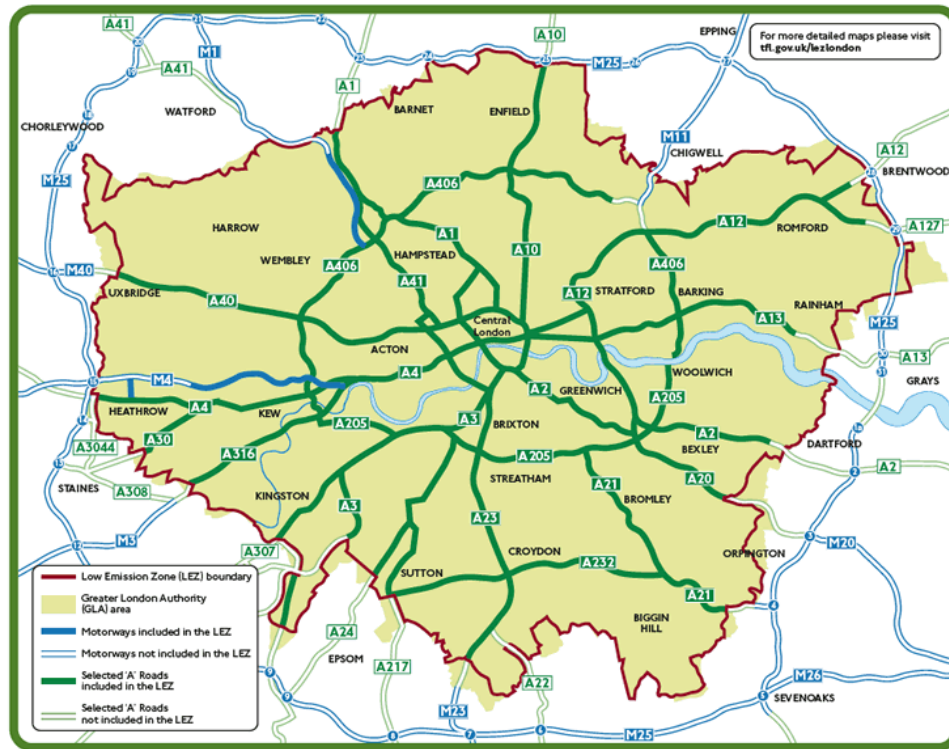


Figure 2-1: London-wide Low Emissions zone for heavy vehicles

- 2.1.4 Currently, the LEZ requires all heavy vehicles to meet a Euro 4 Particulate Matter (PM) standard or pay a daily charge of £200. TfL is proposing that all heavy vehicles driving in the London-wide LEZ will also need to meet an additional Euro 6 standard for Nitrogen Oxides (NOx) and PM or pay a daily charge of £100. Vehicles that do not meet the Euro 4 PM standard would pay a total £300 daily charge.
- 2.1.5 From 26 October 2020, there would be no additional emissions charge for heavy vehicles to drive in the central London ULEZ area.
- 2.1.6 The current LEZ requires vans, minibuses and similar vehicles to meet a Euro 3 PM standard or pay a daily charge of £100.

Expanding the ULEZ

- 2.1.7 The central London ULEZ scheme will come into operation in April 2019 and TfL is proposing that from 25 October 2021 this will cover an expanded area roughly up to, but not including, the North and South Circular roads as indicated on the map below (Figure 2-2). The emissions standards for light vehicles will be:
- Diesel cars, vans, minibuses and similar vehicles – Euro 6 NOx and PM
 - Petrol cars, vans and similar vehicles – Euro 4 NOx
 - Motorcycles, scooters, mopeds and similar vehicles – Euro 3 NOx

2.1.8 Light vehicles which do not meet these standards would need to pay a daily charge of £12.50 in order to drive in the ULEZ. This would be in addition to any applicable daily Congestion Charge in central London.

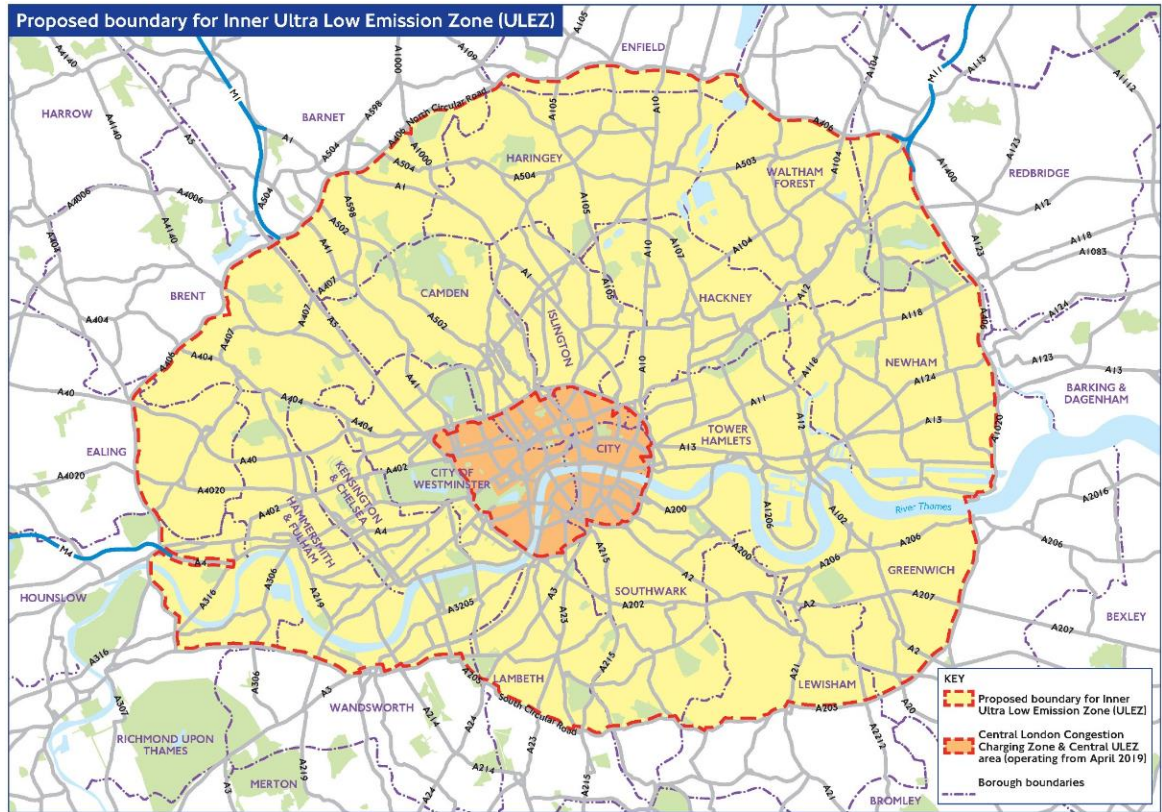


Figure 2-2: Proposed Boundary for Expanded Ultra Low Emission Zone

- 2.1.9 All vehicles will be required to meet emissions standards or pay a daily charge to drive in the zone. Heavy vehicles like buses, coaches and lorries will be covered by the changes to the LEZ set out in the section above.
- 2.1.10 TfL is not proposing any sunset period (time limited 100 percent discount) for residents living the expanded ULEZ area. TfL is proposing the sunset period which forms part of the Central London ULEZ scheme ends 25 October 2021 instead of April 2022 (the currently confirmed end date) i.e. it would end on the start date for the expanded ULEZ (up to the North and South Circular roads). This means all residents within the expanded ULEZ (including in Central London) would need to meet the ULEZ emissions standards or pay the daily charge at the same time.
- 2.1.11 The ULEZ emissions standards for all types of vehicles are set out in Table 2-1 and would operate for 24 hours a day, seven days a week. The geographical scope of the ULEZ would be enforced within the limits of the current Congestion Charge Zone (CCZ), which covers the City of London in its entirety (aside from a small area near to Tower Hill), and covers to varying extents, the City of Westminster and the London boroughs of Camden, Hackney, Islington, Lambeth, Southwark and Tower Hamlets. This area also experiences the highest levels and concentrations of pollution within London, to which the greatest number of people are exposed.

| Vehicle name | Description | Proposed emission standard | Date when manufacturers must sell new vehicles meeting the emission standards |
|------------------------|--|----------------------------|---|
| Motorcycle, moped etc. | Any motorcycle or moped (tricycle or quadricycle) | Euro 3 | From July 2007 |
| Car and small van | A passenger vehicle with no more than 8 seats in addition to the driver's seat. A goods vehicle with weight when empty less than 1,205kg | Euro 4 (petrol) | From 1 January 2008 |
| | | Euro 6 (diesel) | From 1 September 2015 |
| Large van and minibus | Goods vehicle with a gross weight of 3.5 tonnes or less. Passenger vehicle with more than 8 passenger seats and gross vehicle weight of 5 tonnes or less | Euro 4 (petrol) | From 1 January 2007 |
| | | Euro 6 (diesel) | From 1 September 2016 |
| HGV | Lorries and specialist vehicles of more than 3.5 tonnes gross vehicle weight | Euro VI | From 1 January 2014 |
| Bus / coach | Passenger vehicles with more than 8 passenger seats of more than 5 tonnes gross vehicle weight | Euro VI | From 1 January 2014 |

Table 2-1 The ULEZ standards

2.2 The ULEZ Further Proposals (with proposed changes)

2.2.1 TfL is proposing three changes to the ULEZ (as consulted) which relate to:

- Vehicles registered as ‘Disabled’ or ‘Disabled Passenger Vehicle’ tax class (Change 1)
- Wheelchair Adapted Private Hire Vehicles (Change 2); and
- Minibuses used by not for profit organisations (Change 3).

2.2.2 Details on the requirements of the ULEZ (as consulted), together with details on the requirements of the ULEZ (with proposed changes), are set out in Table 2-2. The proposed changes are highlighted in bold.

| Vehicle | ULEZ requirement (as consulted) | The ULEZ requirement (with proposed changes) | Change being assessed in this report |
|--|--|--|--|
| Vehicles with ‘disabled’ or ‘disabled passenger vehicle’ tax class | <ul style="list-style-type: none"> • Eligible for 4.5 year sunset period from introduction of ULEZ in April 2019 until September 2023. | <ul style="list-style-type: none"> • Eligible for 6.5 year sunset period from introduction of Central London ULEZ in April 2019 until September 2025. | <p>Whether the extension in the period over which vehicles with disabled tax class will be exempt from the ULEZ requirements and standards would reduce or remove any impacts identified in the IIA (December 2017)</p> <p>Referred to as Change 1</p> |
| Wheelchair Accessible Private Hire | <ul style="list-style-type: none"> • No concession for PHVs adapted for disability which are not disabled or disabled passenger vehicle tax class | <ul style="list-style-type: none"> • Would be eligible for 6.5 year sunset period from introduction of Central London ULEZ in April 2019 to September 2025 | <p>Whether the provision of a 6.5 year sunset period during which PHVs adapted for wheelchair use will be exempt from the ULEZ charge would reduce or remove any impacts identified in the IIA (December 2017)</p> <p>Referred to as Change 2</p> |
| Minibuses owned by not for profit organisations | <ul style="list-style-type: none"> • No concession for minibuses owned by not for profit organisations | <ul style="list-style-type: none"> • No concession for Central London ULEZ from introduction in April 2019. • Eligible for a 2 year sunset period from introduction of an expanded LEZ in October 2021 to September 2023 | <p>Whether the provision of a 2 year sunset period (commencing with the introduction of an expanded ULEZ) during which minibuses used by not for profit organisations are exempt from the ULEZ charge would reduce or remove any impacts identified in the IIA (December 2017)</p> <p>Referred to as Change 3</p> |

Table 2-2 Proposed changes to the ULEZ Further Proposals

2.3 Scope of the Assessment

- 2.3.1 All three of the changes proposed specifically address impacts identified against the People theme of the IIA (December 2017); specifically, the IIA objective 'To enhance equality and social inclusion' and associated sub-objective 'To maximise accessibility for all and maintain connectivity in and around London and enable sustainable transport choices'. The Addendum Report therefore is focused on the assessment of these changes against this objective, to determine whether the implementation of each change would remove or reduce the adverse impacts identified in the IIA (December 2017).
- 2.3.2 None of the changes proposed are envisaged to have any significant impacts upon the Environment or Economy objectives against which the ULEZ further proposals were assessed, and so these objectives have been scoped out of this Addendum Report.
- 2.3.3 An assessment of the impact of these three changes is provided in Sections 3, 4 and 5.

3 Change 1 – Disabled Tax Class Vehicles

Extend sunset period for disabled tax class vehicles from 4.5 years to 6.5 years.

3.1 Background

- 3.1.1 The DVLA currently provide a vehicle tax exemption for two categories of disabled tax class vehicles:
- *vehicles used by a disabled person; and*
 - *disabled passenger vehicles.*
- 3.1.2 The ULEZ Further Proposals (as consulted in December 2017) provided for a sunset period during which disabled tax class vehicles will be exempt from the ULEZ standards and charges. This sunset period commences with the introduction of the Central London ULEZ in April 2019 and runs until September 2023.
- 3.1.3 Compared with the London average of non-compliance levels for petrol cars and diesel cars, the IIA of the ULEZ Further Proposals identified a disproportionate adverse impact on disabled people who own ‘disabled’ tax class diesel cars and regularly drive into the proposed expanded ULEZ area.
- 3.1.4 The IIA of the ULEZ Further Proposals also identified a disproportionate impact on the owners of diesel powered Wheelchair Adapted Vehicles (WAVs) that would be older than seven years when ULEZ is extended to Inner London in 2021. The cost of adaptations to these vehicles can be very expensive; the average additional cost for a Drive from Wheelchair WAV is £30,000². Consequently, these types of adapted vehicles tend to be kept or leased by their owners for longer than non-adapted vehicles.

| Impact | Duration | Scale |
|---|--------------|----------------|
| Disproportionate negative impact on disabled owners of noncompliant disability tax-registered private vehicles. | Short/Medium | Major/Moderate |
| Differential negative impact on disabled people who own a WAV or lease one through the Motability scheme due to the higher cost of vehicle replacement. | Short/Medium | Moderate/Major |

Table 3.1 Relevant impacts identified in the IIA (December 2017)

² There are two types of Wheelchair Accessible Vehicles (WAVs): Passenger WAVs and Drive from Wheelchair WAVs.

3.2 Baseline for assessment of change

- 3.2.1 Disabled passenger vehicles include those vehicles used by organisations providing transport for disabled people (apart from ambulances). For the purposes of this assessment, they include those Private Hire Vehicles (PHVs), minibuses and coaches that are adapted and provide services to disabled people.
- 3.2.2 The London Travel Demand Survey (2013/14)³ indicates that over half of disabled people use the bus at least once a week, and that the proportion of weekly users of taxi/minicab is higher among disabled people than all other groups surveyed. In contrast their use of the tube (16%) and national rail (8%) are significantly below that of other user groups. This reflects the full accessibility of the London bus and taxi fleets.
- 3.2.3 The density and frequency of bus services, and the number of taxis available in Central London is higher in central London than inner London. As a consequence, it would be expected that the extension of the ULEZ to inner London would have a disproportionate effect on disabled people, as they will have a greater reliance on access to a private car, due to the comparatively lower availability of accessible public transport.
- 3.2.4 As stated in the ULEZ IIA, taxis (which are all wheelchair accessible) and the Dial-a-Ride fleet are excluded from the assessment for the following reasons:
- the ULEZ charge does not apply to taxis; and
 - TfL will ensure the Dial-a-Ride fleet complies with the ULEZ requirements within the required timeframes.
- 3.2.5 A high proportion of disabled passenger vehicles are local authority or community transport vehicles providing accessible transport for disabled clients, children and older people.
- 3.2.6 A large proportion of vehicles (cars) used by disabled people are leased under the Motability scheme, typically for a three year period. However, the lease period for WAVs can be extended up to a maximum of ten years, due to the significant additional cost associated with the adaptation of these vehicles. On the basis of information received from Motability, it is assumed that all vehicles with leases extended up to seven years (typically WAVs) would be ULEZ compliant in 2023.
- 3.2.7 If the age profiles of all diesel and petrol cars registered in Greater London with the DVLA in 2016 are assumed to be the same in 2021, approximately 11% percent of disabled tax class petrol cars and 65% percent of all disabled tax class diesel cars are likely to be non-compliant in 2021. This compares with 12% for all petrol cars, and 51% for all diesel cars.

³ As reported in 'Understanding the Travel Needs of London's Diverse Communities' (TfL 2015) <http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities.pdf>

3.3 Assessment of change

Assessment:

Whether the extension in the period over which vehicles with disabled tax class will be exempt from the ULEZ requirements and standards would reduce or remove any impacts identified in the IIA (December 2017)

3.3.1 Figures 3.1 and 3.2 show the number of non-compliant petrol and diesel disabled tax class cars that would be non-compliant in September 2023 (the end of the sunset period consulted upon the ULEZ Further Proposals) with the equivalent number at the end of the proposed extended sunset period in September 2025 (Change 1). It can be see that the extension of the sunset period for a further 2 years would mean that there would be a significant reduction in non-compliant petrol and diesel cars.

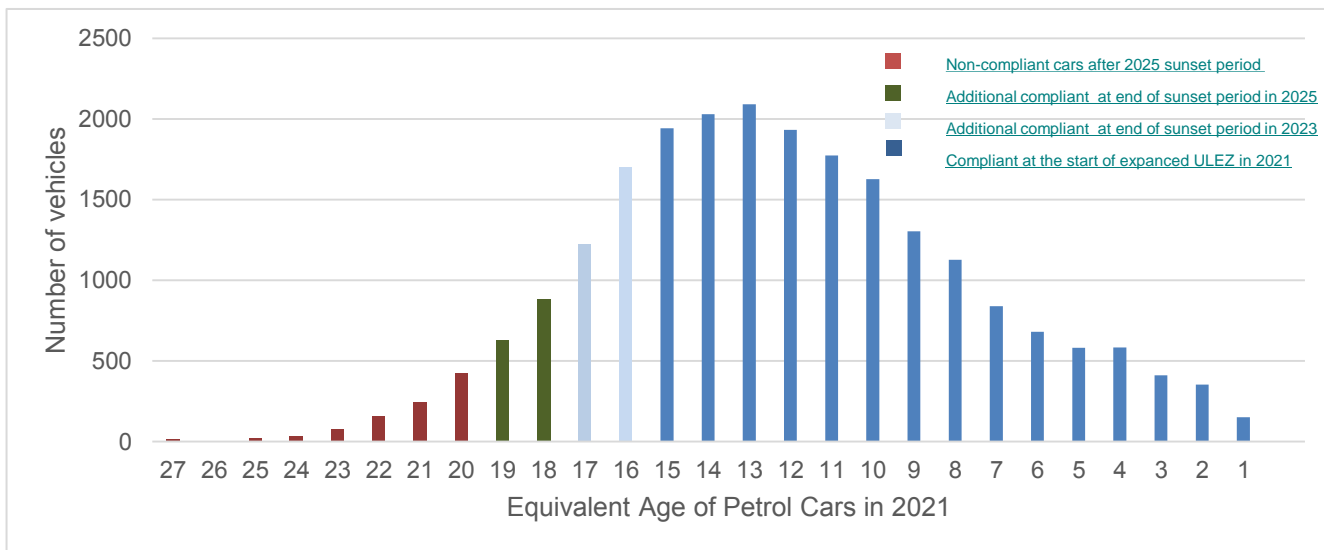


Figure 3-1 ULEZ compliance of disabled tax class petrol cars in 2021, 2023 and 2025 using 2016 age profile.

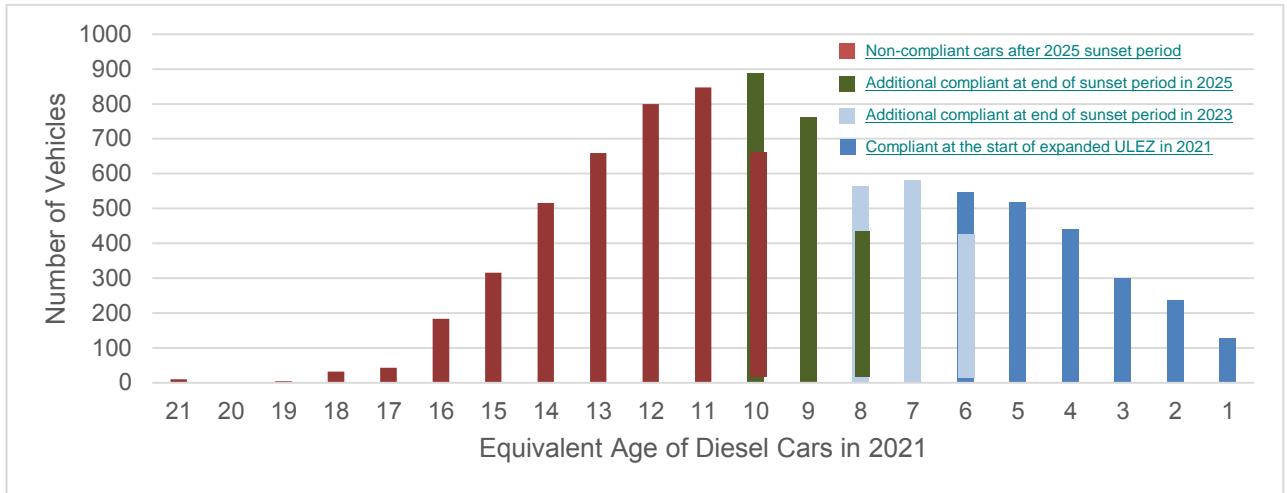


Figure 3-2 ULEZ compliance of disabled tax class diesel cars in 2021, 2023 and 2025 based on 2016 age profile.

3.3.2 Table 3-1 compares the numbers and percentages of disabled tax class cars (petrol and diesel) that would be non-compliant with the ULEZ standards in September 2023 and September 2025.

| Category | non compliant petrol cars (disabled tax class) in 2023 | non-compliant diesel cars (disabled tax class) in 2025 |
|--|--|--|
| ULEZ Further Proposals (as consulted) – Sunset to 2023 | 2,484 (11%) | 5,488 (65%) |
| ULEZ Further Proposals – Change 1 – Sunset to 2025 | 976 (4%) | 4,080 (49%) |

Table 3-1 The ULEZ Further Proposals (as consulted) compared to ULEZ Further Proposals with Change 1

3.3.3 It can be seen that as a result of Change 1 the level of non-compliance for disabled tax class cars when they would be required to meet ULEZ standards would fall considerably. For petrol cars the number of non-compliant vehicles required to pay the charge would reduce from approximately 2,500 to 1,000 (or 11% to 4%). For diesel cars the reduction would be from 5,500 to 4,100 (65% to 50%). This would bring the rates of non-compliance of disabled tax class cars much closer to those of all petrol (12%) and diesel (51%) cars registered in London when the expanded ULEZ is introduced in 2021 (as reported in the ULEZ Further Proposals IIA). This is considered to remove the disproportionate negative impact on disabled owners of (non-adapted) non-compliant disability tax-registered private vehicles reported in the ULEZ IIA of Proposed Changes (2017).

3.3.4 Furthermore, as a result of the proposed extension to the sunset period for a further two years, adapted vehicles up to nine years old would be ULEZ compliant. The small proportion of non-compliant (adapted) vehicles would only be required to pay the ULEZ charge for up to 12 months.

3.3.5 This would reduce the scale and duration of the differential impact on owners of Wheelchair Adapted Vehicles, which are likely to be subject to extended lease arrangements up to a maximum ten years.

3.4 Summary and conclusion

- 3.4.1 Change 1 would mean that, there would be a large reduction in the number of disabled tax class cars (including WAVs) that would be non-compliant with ULEZ, when they become required to meet the ULEZ standards. This would remove the disproportionate impact identified in the ULEZ Further Proposals IIA, and reduce the differential impacts on owners of WAVs.

4 Change 2 – Wheelchair Adapted PHVs

Introduce a 6.5 year sunset period for private hire vehicles adapted for wheelchair users.

4.1 Background

- 4.1.1 The ULEZ Further Proposals (as consulted) do not provide any concession for owners or operators of wheelchair adapted PHVs, except for those which have a disabled tax class.
- 4.1.2 The IIA (December 2017) found that the lack of provision of a concession for owners of WAV PHVs would have a differential impact on disabled people reliant on these vehicles for commuting and accessing local services including education and healthcare, as this group is less likely to be able to use other modes of transport.
- 4.1.3 The purpose of this assessment for Change 2 is to identify whether the provision of a sunset period for WAV PHVs that aligns with the proposed extended sunset period for vehicles with disabled tax status would reduce these impacts.

| Impact | Duration | Scale |
|--|---------------|----------------|
| Differential impact on disabled users of wheelchair accessible PHVs due to the anticipated higher levels of non-compliance among these vehicles. | Short//Medium | Major/Moderate |

Table 4-1 Impacts from the IIA (December 2017) for equality groups relevant to Change 2

4.2 Baseline for assessment of change

- 4.2.1 Data provided by TfL indicates there are currently about 500 designated wheelchair accessible PHVs of which 96 percent have diesel engines.
- 4.2.2 Based on a maximum age limit for PHV WAVs of 15 years, the ULEZ IIA identified that potentially up to 283 vehicles (almost 60%) within the current fleet would not meet the expanded ULEZ requirements in 2021. When the IIA was undertaken the number of these vehicles which are ‘disabled passenger vehicles’ for tax purposes was not known.
- 4.2.3 . To qualify as a ‘disabled passenger vehicle’ for tax purposes:
 - the organisation must care for people who have mental or physical disabilities; and
 - the vehicle must only be used for transporting those people.

- 4.2.4 The anticipated differential impact on disabled users would arise from a reduction in the number of accessible PHVs in service or, alternatively, a significant increase in the hire charge for these vehicles as a result of the costs of compliance with the expanded ULEZ.
- 4.2.5 Since the publication of the IIA (December 2017) TfL has obtained data which indicates that 51% of the current PHV WAV fleet are registered as a 'Disabled Passenger Vehicle'.

4.3 Assessment of change

Assessment:

Whether the provision of a 6.5 year sunset period from the ULEZ charge for PHVs adapted for wheelchair use (WAVs) would reduce or remove the impacts on the disabled people who rely on them.

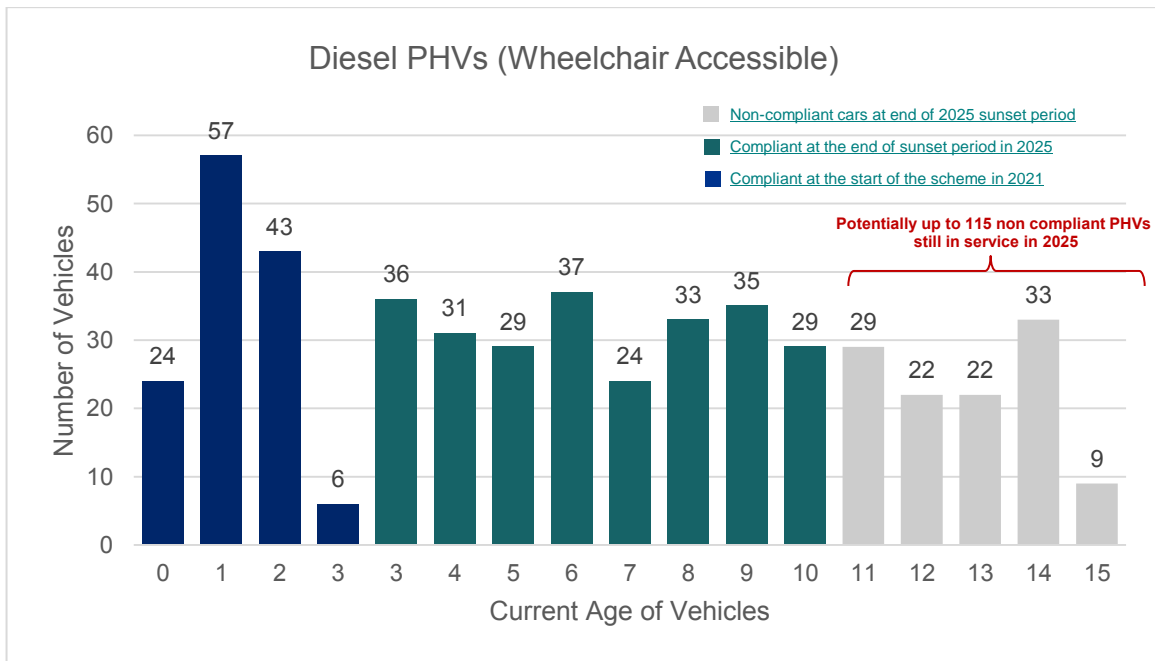


Figure 4-1: ULEZ compliance of diesel WAVs with sunset period from 2019-2025.

- 4.3.1 Based on data provided by TfL, 160 (51%) of the fleet of 311 WAV PHVs are registered Disabled Passenger Vehicles and would therefore benefit from the extension to the sunset period as set out above under Change 1. Change 2 would ensure a level playing field between these vehicles and the WAV PHVs which do not benefit from having disabled passenger vehicle tax status.
- 4.3.2 Data has not been made available on the tax status of individual WAV PHVs and so the assessment is undertaken for the entire fleet, on the assumption that there is no significant difference between the age profile of the disabled tax registered vehicles and the other WAV PHVs. If the 2016 age profile of WAV PHVs is assumed to be unchanged in 2021 and 2025 the number of non-compliant WAV PHVs would reduce from 283 (60%) to 190 (38%). This compares with a rate of non-compliance among the entire PHV fleet of 33%. As a result, the previously identified differential effect on disabled users of WAV PHVs would be reduced from major/moderate to a moderate differential effect.

4.4 Summary and conclusion

- 4.4.1 Change 2 would result in the reduction of the differential impact on disabled users of PHV WAVs identified in the in the ULEZ Further Proposals IIA (December 2017).
- 4.4.2 No other impacts identified in the IIA (October 2014) would be removed as a result of Change 2.

5 Change 3 – Minibuses owned by Not-for-Profit organisations

Introduce a 2 year sunset period for minibuses owned by not-for-profit organisations.

5.1 Background

- 5.1.1 The ULEZ Further Proposals (as consulted) do not provide any concession for owners of minibuses, except for those vehicles registered as disabled passenger vehicles, in which case they would benefit from the disabled vehicle sunset period and Change 1 as set out in this Addendum Report.
- 5.1.2 This change would introduce a 2 year sunset period for not for profit organisations using minibuses in the ULEZ from the introduction of the Extended ULEZ in October 2021.
- 5.1.3 The ULEZ Further Proposals IIA (December 2017) found that there was the potential for differential impacts on groups reliant on charitable or voluntary services, arising from the increased costs of provision or consequential reduction in minibus services provided by community transport operators to and within inner London.
- 5.1.4 The ULEZ Further Proposals IIA also identified a potential adverse differential effect on school children from low income families if the ULEZ costs of compliance for minibuses were passed onto parents or carers.
- 5.1.5 The purpose of this assessment for Change 3 is to identify whether the provision of a 2-year sunset period from 2019 to 2021 for not for profit operators of minibuses would help to reduce these impacts, as set out in Table 5-1.

| Impact | Duration | Scale |
|---|---------------|-------|
| Potential negative differential impact on those groups reliant on charitable or voluntary services (e.g. the disabled, young children and older people) due to increased costs and any consequential reduction in the provision of minibus services to and within inner London provided by community transport operators. | Short//Medium | Major |
| Potential negative differential effect on those school children from low income families if the increase cost of compliance or charge associated with school trips within or to the inner zone is passed onto parents/carers. | Short | Minor |

Table 5-1 Impacts from the IIA (December 2017) for equality groups relevant to Change 3

5.2 Baseline for assessment of change

- 5.2.1 Change 3 would apply to organisations that hold ‘standard permits’ issued under section 19 of the Transport Act 1985. These may be granted to organisations (including education providers, such as schools) that operate vehicles, without a view to profit, to transport their members or people whom the organisation exists to help. (Section 19 permit vehicles cannot be used to carry members of the general public). There are two types: ‘standard permits’ for vehicles which are adapted to carry no more than 16 passengers (excluding the driver); and, ‘large bus permits’ for vehicles which are adapted to carry 17 or more passengers.
- 5.2.2 It has not been possible to obtain data on the number of organisations with section 19 permits. However, all 9+ seater vehicles are eligible for the Congestion Charge discount. Currently, 2,944 vehicles have registered for the Congestion Charge discount. These will include a wide range of vehicles used for profitable and non-profitable purposes. Of these 46% would be compliant if the current age profile were the same in April 2019. It is likely that those used by non-profitable organisations may have an older age profile and therefore lower rates of compliance with ULEZ standards.
- 5.2.3 Furthermore, as the date (September 2016) from which minibuses registered as new with DVLA must meet Euro VI emissions standards is nearly three years later than the equivalent date for Buses/Coaches (January 2014), it should be assumed that level of compliance of minibuses is likely to be lower than the combined average of 46%. For example, the ULEZ Further Proposals IIA reported that there was only 23% compliance with ULEZ standards among 15 Community Transport Companies (CTCs) surveyed by Jacobs in 2017⁴. Over three-quarters of the fleet operated by the CTC’s surveyed were non-compliant minibuses.

⁴ Results of survey can be found in Appendix F of the ULEZ Further Proposals Integrated Impact Assessment (December 2017)

5.3 Assessment of change

Assessment:

Whether the provision of a 2 year sunset period from October 2021 to September 2023 from the ULEZ charge for minibuses operated by not for profit organisations will remove or reduce the impacts on the users groups who rely on them.

- 5.3.1 This change would be introduced at the same time as the expanded ULEZ in October 2021. The rationale for this delayed introduction is based on the greater accessibility and availability of alternative modes of transport (notably buses and taxis) available in central London, compared with Inner London.
- 5.3.2 Based on the assumptions stated above, in terms of the age profile of the fleet, the provision of a two year sunset period would increase the compliance rate of 9+seater vehicles (registered for the CCZ discount) from 46% (in 2021) to 59% (in 2023) when they would be required to meet ULEZ emissions standards. Although the proportion that is compliant is likely to be lower for minibuses operated by not-for-profit organisations, for the reasons given above.
- 5.3.3 By 2025 it is estimated that 72% of 9+ seater vehicles would be compliant, which would ensure there will be no disproportionate impact in terms of the level of compliance of these vehicles compared with other types of vehicle (e.g. diesel cars) by this date.
- 5.3.4 It is considered that the major/moderate differential impacts identified on people reliant on not for profit minibus services (including children, disabled people and older persons) in the ULEZ Further Proposals IIA would reduce to moderate, and would be experienced for a shorter period of time (i.e. up to two years between 2023 and 2025).
- 5.3.5 Although the extended sunset period will enable some schools sufficient time to renew their fleet or develop sharing arrangements with other schools or parent organisations to provide services without incurring the ULEZ charge, this may not be the case for all schools given other pressures on their finances. It is therefore considered that the previously reported potential short term minor impact on children from low income families would remain.

5.4 Summary and conclusion

- 5.4.1 Change 3 would result in the reduction of the differential impact on users of minibuses operated by not for profit organisations identified in the in the ULEZ Further Proposals IIA (December 2017).
- 5.4.2 No other impacts identified in the IIA (October 2014) would be removed or reduced as a result of Change 3.

6 Summary and Conclusions

6.1 Summary of proposed changes

6.1.1 TfL is proposing two changes to the ULEZ (as consulted) as summarised in Table 5-1.

| Change no. | Description |
|------------|---|
| 1 | Extend sunset period for disabled tax class vehicles from 4.5 years (April 2019 to September 2023) to 6.5 years (April 2019 to September 2025) |
| 2 | Introduce a sunset period for private hire vehicles adapted for wheelchair users from the introduction of ULEZ in April 2019 to September 2025. |
| 3 | Introduce a 2 year sunset period for minibuses owned by not-for-profit organisations (from October 2021 to September 2023). |

Table 6-1 Summary of proposed changes to the ULEZ Further Proposals

6.1.2 The impacts reported in the ULEZ Further Proposals IIA (December 2017) are summarised in Table 6-2. This shows that Proposed Changes would result in the removal of one identified impact and the reduction of a further three impacts previously identified. All changes relate to a reduction in the impacts identified against the IIA objective: to enhance equality and social inclusion. One impact would be removed, two would be reduced in scale and duration, and one in scale.

| Relevant impacts identified in the IIA (December 2017) | Scale and duration of original impact | Relevant change assessed (no.) | Revised scale and duration of impact |
|---|--|--------------------------------|--------------------------------------|
| Disproportionate negative impact on disabled owners of noncompliant disability tax-registered private vehicles. | Major over short term Moderate over medium term | 1 | No impacts |
| Differential negative impact on disabled people who own a WAV or lease one through the Motability scheme due to the higher cost of vehicle replacement. | Major over short term Moderate over medium term | 1 | Short term Minor impact |
| Differential impact on disabled users of wheelchair accessible PHVs due to the anticipated higher levels of non-compliance among these vehicles. | Major over short term Moderate over medium term | 2 | Short term Moderate impact |
| Potential negative differential impact on those groups reliant on charitable or voluntary services (e.g. the disabled, young children and older people) due to increased costs and any consequential reduction in the provision of minibus services to and within inner London provided by community transport operators. | Major/ Moderate over short term | 3 | Short term Moderate |
| Potential negative differential effect on those school children from low income families if the increase cost of compliance or charge associated with school trips within or to the inner zone is passed onto parents/carers. | Minor over short term | 3 | No change |

Table 6-2 Summary of changes to the impacts identified in the IIA (December 2017) for the ULEZ Further Proposals (with proposed changes)

7 Acronyms

| | |
|-----------------|-------------------------------------|
| BAME | Black, Asian, Minority Ethnic |
| CCZ | Congestion Charging Zone |
| CO ₂ | Carbon Dioxide |
| DVLA | Driver and Vehicle Licensing Agency |
| EU | European Union |
| HGV | Heavy Goods Vehicle |
| IIA | Integrated Impact Assessment |
| LGV | Light Goods Vehicle |
| NO ₂ | Nitrogen Dioxide |
| NO _x | Nitrogen Oxide |
| PHV | Private Hire Vehicle |
| PM | Particulate Matter |
| TfL | Transport for London |
| ULEZ | Ultra Low Emission Zone |
| WAV | Wheelchair Adapted Vehicle |