



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

Our ref: CR-0405
28 February 2018

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

cc. Shirley Rodriguez, Deputy Mayor for Environment and Energy.

Dear Sadiq

ULEZ 3b proposals, consultation response:

- **London wide Ultra Low Emission Zone (ULEZ) for heavy vehicles – this would apply to buses, coaches and HGVs from 2020;**
- **Inner London Ultra Low Emission Zone (ULEZ) for light vehicles from central London to inner London up to, but not including the North and South Circular roads. This would apply to cars, vans and motorcycles from 2021.**

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

My detailed views on the current (Stage 3bⁱ) consultation are set out overleaf. These should be considered along with my comments on your earlier ULEZ consultations (stage 1ⁱⁱ, 2ⁱⁱⁱ and 3a^{iv}).

In summary, Londoners need you to:

- Aim for all Londoners to breathe safe air within EU limits for nitrogen dioxide (NO₂) 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
- Improve public transport, pedestrian and cycling provision, especially in outer London
- Bring in a London-wide smart road pricing scheme to reduce traffic, where charges can vary by time of day, distance travelled and the level of emissions from the vehicle being driven. This allows fairness issues to be addressed with exceptions for essential workers eg midwives and care workers who carry heavy equipment.



City Hall **Green** — Caroline Russell AM

caroline.russell@london.gov.uk 020 7983 4388 @carolinerussell

Finally, I am pleased to see that you have used the World Health Organisation guidelines for setting a particulate matter target for London in your draft Environment Strategy^v as I suggested in my 'Left Out Londoners' report last June^{vi}.

Yours sincerely,

A handwritten signature in black ink that reads "Caroline Russell". The signature is written in a cursive style with a large initial 'C' and 'R'.

Caroline Russell AM



City Hall Green — Caroline Russell AM

caroline.russell@london.gov.uk 020 7983 4388 @carolinerussell

Caroline Russell's response to the current [stage 3b] consultation:

PART 1: Proposals for a stronger Low Emission Zone (LEZ)

1. Do you support tougher vehicle emissions standards in the London-wide Low Emission Zone so that heavy vehicles must meet the Euro VI emissions standards London-wide?

I strongly support a London-wide Euro VI emissions standard for heavy vehicles (coaches, lorries and buses). However, this London-wide ULEZ should also be applied to light vehicles (vans, cars and motorbikes)

2. Do you support the proposed implementation date of 26 October 2020 for the introduction of tougher Euro VI standards for heavy vehicles driving in the London-wide Low Emission Zone?

I oppose (should be sooner) this proposal. All phases of the ULEZ should be implemented within this mayoral term (by May 2020).

3. Do you support the proposed daily charges to be paid by owners of heavy vehicles that do not meet the required emissions standards at:

- **£300 for those that do not meet Euro IV PM standards and;**
- **£100 for those that do not meet Euro VI NOx and PM standards?**

I support the charges, however I would prefer to see a smart road charging scheme as an integral part of the ULEZ, with charges based on the time of day, distance travelled and level of vehicle emissions.

PART 2: Proposals for an expanded Ultra Low Emission Zone (ULEZ)

4. Do you support the principle of expanding the area where ULEZ emissions standards apply to light vehicles beyond central London?

I strongly support the principle of expanding the central London ULEZ for light vehicles beyond central London.

5. We are proposing that the ULEZ emissions standards would apply to the inner London area, roughly up to but not including the North and South Circulars roads. Do you support this proposed boundary?

I support an expansion but the area should be larger and extend beyond the North and South Circulars to cover the whole of London.



6. Do you support the proposed implementation date of 25 October 2021 for the expansion of ULEZ to include light vehicles in inner London?

I oppose (should be sooner) and all phases of the ULEZ should be implemented within this mayoral term (by May 2020).

7. Do you support the proposed ULEZ daily charge to be paid by non-compliant owners of light vehicles of £12.50?

I support the charges. I would prefer to see a smart road charging scheme as an integral part of the ULEZ, with charges based on the time of day, distance travelled and level of vehicle emissions.

PART 3: Proposals for residents

8. Do you support bringing forward the end of the sunset period for residents in the Central London Congestion Charging zone from 7 April 2022 to 24 October 2021 so that all residents of inner London, including the Congestion Charging zone, pay the daily charge for non-compliant vehicles from 25 October 2021?

I strongly support charging all residents in inner and central London from the date of implementation. I would prefer implementation in this Mayoral term by May 2020.

In principle, I do not support a residents' sunset period, because this will not discourage short car journeys. Any sunset period charge must have a car-use deterrent effect.

PART 4: Proposals for penalty charges

9. Do you support increasing the penalty charge (PCN) level for non-payment of the ULEZ daily charge by owners of non-compliant light vehicles from £130 to £160?

I support the increase in the penalty charge. However, I would prefer a smart road charging scheme so that penalty fares would not be necessary. Road pricing is fairer and more transparent than a cordon based fees system.

PART 5: Other comments

I would like to see all of London covered by the ULEZ so that no Londoner is left out. The health effects of bad air are so serious that it would be wrong to leave out any part of London.

ⁱ <https://consultations.tfl.gov.uk/environment/air-quality-consultation-phase-3b/?cid=airquality-consultation>

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

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

^{iv} https://www.london.gov.uk/sites/default/files/caroline_russells_response_to_ulez_consultation.pdf

^v <https://www.airqualitynews.com/2017/08/11/london-targets-air-quality-limits-2030/>

^{vi} Left out Londoners – why we need a fairer ULEZ, Caroline Russell AM, June 2017

https://www.london.gov.uk/sites/default/files/left_out_londoners_june_2017.pdf

